



Responsible Artificial Intelligence Policy

E Ink Holdings Inc. ("the Company"), a leading global developer and supplier of ePaper display technology, actively adopts Artificial Intelligence (AI) technologies to enhance operational efficiency, product value, and user experience in advancing digital transformation and innovative applications. Management recognizes the potential impacts of AI applications on society, the environment, and corporate governance, and is committed to proactively establishing AI-related strategies, management objectives, and quantitative performance indicators. The Company actively implements and incorporates the seven core principles of Sustainable Development and Well-being, Human Autonomy, Privacy Protection and Data Governance, Cybersecurity and Safety, Transparency and Explainability, Fairness and Non-Discrimination, and Accountability into its daily operations and decision-making processes. The Company is committed to establishing a comprehensive AI governance framework to ensure that AI applications align with human rights protection, regulatory requirements, and international best practices, thereby promoting sustainable business operations.

I. Leadership and Governance

The Chairman Office serves as the highest governing body responsible for overseeing the management of AI-related risks and opportunities across the entire AI lifecycle. Management at all levels is responsible for ensuring regulatory compliance, implementing corporate requirements, and executing this policy. A cross-functional AI governance organization shall be established to coordinate and oversee the implementation of related management measures.

II. Stakeholder Communication and Employee Participation

Through training programs and internal and external communication mechanisms, the Company enhances the awareness of employees and other stakeholders regarding AI-related risks and responsibilities, promotes cross-functional collaboration, and supports continuous improvement.

III. Core Principles

1. Sustainable Development and Well-being

In the development and application of AI technologies, the Company seeks to balance social equity and environmental sustainability. The Company considers environmental sustainability and resource efficiency by continuously improving computing resource allocation and evaluating the adoption of low-carbon energy and energy-efficient technologies to reduce energy consumption and environmental impacts. In addition, appropriate education and training are provided to employees to help reduce potential digital divides and support adaptation to operational and workplace changes driven by AI.

2. Human Autonomy

The Company adopts a human-centered approach and respects the rule of law and democratic values. For AI applications involving significant or critical decisions, human oversight mechanisms and final decision-making authority shall be retained. Human-in-the-loop (HITL), human-on-the-loop (HOTL), and emergency override mechanisms shall be established to ensure that AI systems remain under meaningful human control and operate within reasonable and manageable boundaries.

3. Privacy Protection and Data Governance

The Company establishes comprehensive data governance mechanisms to ensure that data collection, processing, and use throughout the design, development, and operation of AI systems comply with applicable laws, privacy protection requirements, and the principle of data minimization. Personal data privacy shall be properly protected, and corporate trade secrets shall be respected to prevent data leakage.



4. Cybersecurity and Safety

The Company establishes stringent cybersecurity protection and access control mechanisms to prevent unauthorized access, malicious attacks, data tampering, and data breaches. Measures including secure software development, encryption technologies, penetration testing, and incident response are adopted to ensure the robustness and safety of AI systems. Enhanced oversight is applied to sensitive AI applications.

5. Transparency and Explainability

The Company enhances the transparency of AI systems through appropriate disclosure and labeling practices, enabling stakeholders to understand how AI systems operate, their use cases, limitations, and potential risks. Users shall be able to recognize when they are interacting with AI systems and identify AI-generated content or decision outcomes.

6. Fairness and Non-Discrimination

The Company seeks to avoid the risks of algorithmic bias and discrimination throughout the development and application of AI technologies. Through reviews of diverse data sources, bias testing, and regular evaluation mechanisms, the Company seeks to ensure that training and testing datasets are representative, balanced, and do not generate unfair or discriminatory outcomes toward specific groups.

7. Accountability

The Company establishes clear governance and accountability mechanisms. Responsibilities are clearly defined, responsible AI governance units and personnel are designated, and risk assessment, continuous monitoring, and incident reporting mechanisms are established. These measures ensure that AI system operations, decision-making logic, and outputs remain traceable, auditable, and manageable.

IV. Implementation and Continuous Improvement

1. Regulatory Compliance and International Standards

The Company closely monitors and complies with applicable AI-related regulations, personal data protection laws, and information security requirements in relevant jurisdictions. The latest regulatory developments and international standards are incorporated into the Company's governance framework and operational decision-making processes in a timely manner.

2. AI Usage Scope, Restrictions, and Risk Management

The Company clearly defines the scope and limitations of AI use and avoids using AI in high-risk or inappropriate scenarios. Risk assessments and corresponding control measures are implemented for specific AI applications.

3. Prohibited AI Practices

The Company strictly prohibits the development, deployment, or use of AI systems that may infringe upon fundamental human rights, violate ethical principles, or cause severe adverse impacts on individuals or society. This includes, but is not limited to, AI systems that manipulate or mislead human behavior, exploit vulnerabilities due to age or physical or mental disability, conduct social scoring, or engage in unauthorized biometric surveillance or other applications that infringe upon privacy and freedom.

4. Continuous Improvement

Through performance indicators and management mechanisms, the Company regularly reviews the effectiveness of AI governance, continuously improves related systems and processes, monitors model performance and drift, establishes grievance and response mechanisms, and progressively evaluates the environmental and social impacts of AI.

A handwritten signature in black ink, consisting of a series of loops and strokes, positioned above a horizontal line.

Chairman & CEO