

Primax Group Responsible Artificial Intelligence Policy

Article 1 Purpose

Primax Group (the “Group”) is committed to the reasonable, lawful, and responsible application of artificial intelligence (“AI”) technologies to enhance operational efficiency, innovation capabilities, and corporate competitiveness.

The Group recognizes that while AI technologies can create business value and social benefits, they may also give rise to risks relating to data privacy, information security, human rights, fairness, transparency, and environmental impact. The Group therefore commits to following responsible AI principles and establishing appropriate governance mechanisms to ensure that the use and integration of AI are consistent with corporate values, applicable laws and regulations, and stakeholder expectations.

Article 2 Scope

This Policy applies to:

- All employees of the Group.
- AI tools, services, and systems used in the Group’s operations.
- AI-related applications integrated, deployed, or introduced by the Group.

Article 3 Governance and Accountability

The Digital Transformation Office shall coordinate AI governance matters across the Group and shall be responsible for promoting, maintaining, and periodically reviewing this Policy.

Each business and functional unit shall comply with the principles of this Policy when using or introducing AI technologies and shall share responsibility for appropriate management.

Analyses, recommendations, predictions, or content generated by AI systems shall not replace professional human judgment. Ultimate accountability remains with the Group and the relevant responsible personnel.

Article 4 Responsible Artificial Intelligence Principles

1. Data Privacy Protection

The Group is committed to protecting personal data and sensitive information throughout the use and integration of AI and to complying with applicable laws, regulations, and relevant internal requirements.

The Group shall adopt appropriate management measures to ensure that the collection, use, retention, and processing of data are lawful, fair, and limited to what is necessary.

2. Information Security Protection

The Group is committed to implementing appropriate information security measures to protect AI systems, related models, and data assets.

The Group shall continue to strengthen information security management for AI applications to mitigate unauthorized access, data leakage, model misuse, and other cybersecurity risks.

3. Fairness and Bias Prevention

The Group is committed to preventing unreasonable bias, discrimination, or unfair treatment arising from data, models, or decision logic in the use and integration of AI.

The Group shall encourage AI to be used in a fair and inclusive manner that respects human rights.

4. Human Oversight and Final Decision-Making

AI may be used as a supporting tool for analysis, prediction, recommendations, and content generation.

For matters involving significant business decisions, legal or regulatory compliance, personnel management, customer interests, or other potentially material impacts, the Group shall retain human review, judgment, and intervention mechanisms to ensure necessary human oversight and decision-making authority.

5. Transparency and Explainability

The Group is committed to enhancing the transparency of AI applications within reasonable limits so that users can understand the role, purpose, and limitations of AI.

For significant decisions or outcomes, the Group shall endeavor to provide appropriate explanations and information to promote understanding and trust.

6. Accountability

The Group recognizes that AI systems are supporting tools. Their generated content, analytical results, or recommendations shall not be treated as decisions made by an independent decision-maker.

The Group shall establish clear accountability mechanisms to ensure that decisions and consequences related to AI applications are assigned to the appropriate responsible units and personnel.

7. Scope and Boundaries of Use

The Group's use and integration of AI shall be lawful, compliant, and consistent with authorized purposes.

The Group shall establish appropriate controls over the scope of AI applications to prevent AI from being used beyond its intended purpose or for improper purposes.

8. Environmental Sustainability

The Group recognizes the energy consumption and environmental impacts that may arise from the development and use of AI technologies.

Where feasible, the Group shall prioritize AI services, models, and data center resources with greater energy efficiency and lower environmental impact and shall continue to monitor the implications of AI technologies for environmental sustainability.

9. Prohibited and Restricted AI Applications

The Group shall not develop, deploy, or use the following types of AI applications:

- AI systems that manipulate, mislead, or improperly influence individual decision-making.
- AI systems that exploit the vulnerabilities of disadvantaged or vulnerable groups, including children, older persons, or persons with disabilities, or subject them to unfair treatment.
- Social scoring systems that evaluate individuals based on their behavior, characteristics, or social conduct and use such scores in ways that affect their rights or interests.

For applications involving facial recognition, voice recognition, fingerprint recognition, or other biometric identification technologies, the Group shall comply with applicable laws and regulations, respect individual

privacy and fundamental rights, and implement appropriate authorization, information security, and risk management measures.

Article 5 Policy Review

The Group shall periodically review and, where appropriate, revise this Policy in response to regulatory requirements, technological developments, operational needs, and stakeholder expectations in order to continuously enhance its AI governance capabilities and responsible AI practices.