



新奥天然气股份有限公司

ENN Natural Gas Co., Ltd.

(Stock Code: 600803)

Responsible Artificial Intelligence Policy

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1. General Provisions

1.1. Purpose

Artificial Intelligence (AI) technology is rapidly becoming integrated into the energy industry and is an important force for advancing digital and intelligent transformation, improving operational efficiency and enhancing customer service experience. As a listed clean energy company with a presence across the natural gas value chain, ENN Natural Gas Co., Ltd. (hereinafter referred to as "the Company" or "ENN Natural Gas") has consistently upheld the value principle of "originating from customers, treating partners as equals and co-creating a thriving ecosystem". While actively promoting the integration of AI technology into smart gas networks, intelligent operations, customer service and other business scenarios, the Company always regards safety, compliance, trustworthiness and sustainability as the fundamental prerequisites for AI applications.

This Policy is formulated to regulate the application of AI technology in the Company's operations and management, promote the safe, compliant, prudent, transparent and green use of AI, prevent related risks, and establish and improve a responsible artificial intelligence governance system aligned with the Company's digital and intelligent transformation strategy, in accordance with applicable laws, regulations and international principles and taking into account the Company's business practices.

1.2. Basic Principles

The Company adheres to the following six basic principles to coordinate the advancement of AI applications and risk prevention, so that AI technology can better serve customer value creation and the Company's high-quality development:

- (1) Customer-centricity: AI applications shall be driven by customer needs, serve customer value creation and social well-being, and always place the protection of customer rights and interests first;
- (2) Safety and compliance: The Company shall observe safety bottom lines and compliance red lines, ensure that AI systems are safe, reliable and controllable, and ensure that risks can be identified, prevented and addressed;
- (3) Fairness and impartiality: The Company shall prevent algorithmic bias and discrimination and treat employees, customers, business partners and all stakeholders fairly;
- (4) Transparency and trustworthiness: The Company shall improve the transparency and explainability of AI applications so that the use of AI and its decision-making processes are understandable, subject to oversight and traceable;
- (5) Clear accountability: The Company shall define the responsible parties and boundaries of responsibility for AI applications to ensure that AI use is manageable and accountable;
- (6) Green and low-carbon development: The Company shall reduce the ecological footprint of AI applications and support the Company's green and low-carbon transition and sustainable development objectives.

1.3. Scope of Application

This Policy applies to the Company and its controlled subsidiaries. The Company also requires business partners, suppliers and contractors to observe the principles embodied in this Policy when engaging in activities related to the Company's business.

2. Data Privacy and Personal Information Protection

The Company respects and protects data privacy, personal information and trade secrets involved in the use and development of AI. Throughout the lifecycle of AI development and application, the Company gives priority to data privacy protection.

- (1) Strictly comply with the Cybersecurity Law of the People's Republic of China, the Data Security Law of the People's Republic of China, the Personal Information Protection Law of the People's Republic of China and other applicable data protection laws and regulations;
- (2) Ensure that data used for AI training and applications is obtained from lawful sources, has clear ownership and has sufficient authorization;

- (3) Continuously strengthen data security protection through technical measures such as access controls, data encryption, desensitization and anonymization, prevent data leakage, misuse or unauthorized access, and effectively protect the data rights and interests of users and business partners;
- (4) Without authorization, do not input personal information, sensitive information, trade secrets, undisclosed business information or other legally protected data into external AI tools or third-party models.
- (5) For scenarios involving cross-border data transfer or the provision of data to overseas recipients, strictly comply with applicable requirements for data export security management, lawfully conduct data export security assessments or personal information protection certification, or enter into standard contracts, to ensure the legality and compliance of data export;
- (6) For business data that must be exported, implement data export security assessment and registration management. Without approval through the legally required procedures, do not provide important data, core data or personal information to overseas recipients.

3. AI Systems and Cybersecurity

The Company implements strict cybersecurity and system security management measures throughout the research and development, deployment and operation of AI systems to ensure a secure and reliable operating environment for AI systems.

- (1) Incorporate AI systems, models, tools, interfaces and related services into the Company's cybersecurity and information security management system, and strengthen content filtering, access management, identity authentication, access controls, log auditing, security monitoring and emergency response;
- (2) Continuously strengthen AI system security testing and risk assessment, prevent risks such as model hallucinations, prompt injection attacks, data leakage and system misuse, and ensure that AI applications are stable, safe and controllable;
- (3) For third-party AI platforms, models and services purchased or used through cooperation, pay attention to their cybersecurity, data security and system stability, and prevent information security risks arising from AI applications.

4. Algorithmic Fairness and Bias Prevention

In the training and application of AI models, the Company pays close attention to algorithmic bias and strives to prevent AI systems from producing unreasonable discrimination or bias in services, decisions or recommendations.

- (1) Identify and reduce bias in training data, strive to build more diverse and representative datasets, and continuously improve algorithmic fairness;
- (2) For AI application scenarios that may affect the rights and interests of employees, customers, suppliers, business partners and other stakeholders, conduct prudent assessments and use AI appropriately;
- (3) Conduct regular assessments of deployed AI models, identify and mitigate bias that may affect their decisions or results, and take measures such as human review and correction when necessary to ensure that AI models treat all groups fairly;
- (4) Establish mechanisms for detecting and correcting AI model drift or degradation. Through continuous monitoring of model performance, promptly identify declines in accuracy and take corrective measures such as retraining and parameter adjustment to ensure that AI systems remain reliable and relevant over the long term.

5. Human Oversight and Human Intervention

For AI application scenarios involving key business decisions, public safety or potentially significant impacts, the Company adheres to the principle of Human-in-the-loop.

- (1) Maintain human participation at critical decision-making stages and establish necessary human intervention mechanisms to ensure that AI serves as an auxiliary tool in the decision-making process and does not replace human final judgment in important areas;
- (2) For major business decisions, financial disclosures, compliance determinations, quality and safety, legal matters and other important sensitive matters, AI-generated results may only be used as auxiliary references and may not replace professional human judgment or final decisions;
- (3) Depending on the specific scenario, the Company may conduct human review, verification and correction of AI system operations, outputs and application processes, or suspend or discontinue their use;

- (4) In the absence of human oversight and mechanisms for human review or veto, AI systems shall not make irreversible or high-risk decisions.

6. Transparency and Explainability

The Company is committed to improving the transparency and explainability of AI applications.

- (1) Clearly explain the use cases, capability boundaries, data sources and potential risks of AI systems;
- (2) Where necessary, provide understandable explanatory grounds for AI-generated results or decisions;
- (3) Depending on the circumstances, adopt appropriate labeling, explanatory or record-keeping measures for AI-generated content, AI-assisted analysis results and important outputs produced with AI participation;
- (4) Ensure that users clearly understand when they are interacting with an AI system;
- (5) Use AI outputs that lack a reasonable basis, contain logical anomalies or cannot be effectively explained with caution, and do not directly use them as the final basis for decisions.

7. AI Accountability and Risk Governance

The Company establishes a clear AI accountability and governance system and defines the responsible parties throughout AI research and development, deployment, operation and decision-making.

- (1) Define the boundaries of responsibility among business departments, technical support departments and relevant management departments to ensure that AI use is traceable, manageable and accountable;
- (2) The business department using AI is responsible for the compliance, appropriateness and application of results in its business scenario. Relevant functional departments shall, according to their respective responsibilities, perform technical management, security assurance, compliance review and supervision and inspection;
- (3) Establish procedures to investigate and handle errors or adverse impacts that may be caused by AI systems, ensuring that risks and legal liabilities related to AI decisions can be effectively identified and managed;

- (4) Hold accountable those who use AI in violation of applicable requirements or cause adverse impacts due to inadequate management, in accordance with the Company's relevant rules and systems.

8. AI Capability Boundaries and Application Management

The Company clearly defines the application scope and capability boundaries of AI systems, including the tasks that AI may perform and scenarios in which AI is unsuitable or prohibited, to prevent technology misuse or use beyond the authorized scope.

- (1) Use AI reasonably, proportionately and prudently, and clearly define the boundaries of what AI may and may not do;
- (2) AI shall not exceed its authorized scope by intervening in key matters that should be judged independently by humans, nor be used in high-risk or sensitive scenarios without effective control measures;
- (3) Define the applicable scope, usage restrictions and management requirements for AI tools according to different business scenarios;
- (4) Implement strict access controls for sensitive AI functions, such as facial recognition and surveillance applications, to ensure that they are used only by authorized personnel under specific conditions and appropriate supervision, thereby reducing the risk of misuse or abuse.

9. Green and Low-Carbon Development and Sustainability

While developing AI technology, the Company pays attention to the environmental impacts of its own and third-party AI infrastructure and promotes the deep integration of AI technology with green and low-carbon development.

- (1) Encourage the use of low-carbon and environmentally friendly, energy- and water-efficient data centers, green computing power and renewable energy;
- (2) Give priority to AI models, platforms, service providers and data center solutions with higher energy efficiency, lower resource consumption and lower environmental impacts, and encourage the reduction of the ecological footprint of AI applications through appropriate selection, proportionate use and optimization;
- (3) Actively promote the application of AI technology in energy conservation and emissions reduction, smart gas network optimization, green energy management and sustainable development to reduce the ecological footprint of AI technology;

- (4) Explore quantifying the impact of AI initiatives and tools on sustainability outcomes, such as carbon emissions and resource efficiency, and support sustainable decision-making through data-driven methods.

10. Prohibited Uses

The Company shall not develop, deploy or use AI systems or applications engaged in the following high-risk or improper uses:

- (1) Systems that influence the independent judgment or behavior of others through manipulation, inducement, deception or similar means;
- (2) Systems that exploit, mislead or improperly influence the vulnerabilities of specific groups, such as vulnerabilities related to age, disability or particular socioeconomic circumstances;
- (3) Systems used for social scoring, social ranking or differential treatment based on improper criteria;
- (4) Systems that conduct biometric identification, facial-recognition surveillance or other biometric monitoring activities without lawful authorization;
- (5) Other AI systems and applications that violate laws and regulations, regulatory requirements, ethical standards or the Company's rules and systems.

The Company continuously monitors international developments in AI governance, including high-risk AI applications prohibited under the European Union Artificial Intelligence Act.

11. Objection and Appeal Mechanisms

Where AI-generated results or AI-assisted decisions have a significant impact on relevant personnel, users or other affected third parties, the Company supports relevant parties in submitting objections or requests for review in accordance with applicable rules.

- (1) Establish transparent, accessible and timely appeal procedures to provide individuals or entities affected by AI-driven decisions with a clear channel for challenging results;
- (2) Conduct human review in light of specific circumstances and, where necessary, take measures such as providing explanations, correcting results, suspending application or taking other necessary actions;

- (3) Strengthen the accountability of AI systems through appeal mechanisms and maintain stakeholders' trust in AI technology.

12. Training and Capacity Building

The Company will continue to conduct training on AI ethics and security to improve employees' awareness and ability to use AI in a compliant manner.

- (1) Training shall cover topics such as bias awareness, data privacy, the ethical implications of AI decisions and AI system security protection;
- (2) Training shall cover all employees and personnel in key positions, fostering a culture of responsible AI use within the organization;
- (3) Continuously update training content in line with business development, technological progress and regulatory changes.

13. Continuous Improvement and Oversight

This Policy shall be issued and implemented after being reviewed and approved by the Company's management and shall be subject to the supervision of the Board of Directors. It shall serve as the basis for the Company's formulation of relevant AI management systems, operating guidelines and business rules. The Company will continue to improve its AI governance mechanisms, strengthen risk assessment and compliance review, and proactively accept supervision by regulatory authorities and the public.

- (1) In principle, this Policy shall be reviewed at least once a year and amended in a timely manner according to changes in laws and regulations, regulatory requirements, industry practices and the Company's business development;
- (2) Actively explore independent external validation of the AI management system, such as ISO 42001 certification for an artificial intelligence management system, to ensure the professionalism and international compliance of the governance system;
- (3) Incorporate AI governance into the Company's ESG management system and disclose AI governance practices and progress in the ESG Report or on the Company's website;
- (4) Actively participate in exchanges on industry standards and best practices and work with relevant parties to promote responsible AI development aimed at serving human well-being.