

Responsible Artificial Intelligence Principles

Aier Eye Hospital Group Co., Ltd.

I. Data Privacy Protection

The Group commits to complying with the principles of data minimization and purpose limitation throughout the entire lifecycle of AI systems, and processes data in accordance with applicable regulations including the *Personal Information Protection Law of the People's Republic of China*, the *Data Security Law of the People's Republic of China*, and the *Measures for the Administration of Data Security and Personal Information Protection in Medical and Health Institutions (for Trial Implementation)*. Important patient data generated within the territory of China shall be stored domestically; a security assessment shall be conducted in accordance with regulations if cross-border transfer is truly necessary. Patients shall enjoy the rights to know, access, correct, and refuse automated decision-making in accordance with the law. Model training may only use desensitized and anonymized data. It is strictly prohibited to use non-desensitized patient data for commercial AI training.

II. Algorithm and Cybersecurity Protection

The Group requires all AI systems to follow secure design principles, and shall not be launched online until a joint review by technology, legal, and operation teams organized by the Algorithm Security Management Committee has been completed and a *Self-Assessment Report on Algorithm Security* has been formulated. After launch, dynamic security monitoring shall be carried out throughout the service of the launched AI systems in accordance with the *Algorithm Security Monitoring System* to timely identify and address security risks. Meanwhile, encrypted transmission and storage protection measures shall be adopted for data, regular cybersecurity classified protection shall be implemented, and relevant systems shall pass annual assessments to continuously comply with the *Cybersecurity Law* and other laws and regulations.

III. Algorithm Fairness and Bias Prevention

The Group commits to conducting fairness testing on AI systems and regular hierarchical performance monitoring of online models. Bias audits shall be performed on AI systems for clinical

scenarios to prevent algorithmic discrimination, ensure fairness in diagnosis and treatment, and comply with the relevant regulatory requirements of the *Implementation Opinions on Promoting and Regulating the Application and Development of "AI + Healthcare"*.

IV. Human-in-the-Loop (HITL)

The Group ensures that licensed physicians have the final decision-making authority in all AI applications affecting patient diagnosis and treatment decisions. Clinical scenarios (such as surgical plan recommendations) must be reviewed and confirmed by qualified licensed physicians, and AI conclusions shall not be directly used as diagnosis and treatment conclusions. All AI systems shall be equipped with functions allowing authorized medical staff to intervene, revise, and override at any time. Full-process records shall be traceable and tamper-proof, with a retention period not shorter than the statutory retention period of medical records, adhering to the bottom line of medical quality and safety.

V. Transparency and Explainability

The Group commits to fulfilling the obligation of informed consent. For all diagnosis and treatment services utilizing AI systems, patients shall be clearly informed of such use in an understandable manner. The deployment of completely unexplainable black-box systems in high-risk medical scenarios is prohibited. Meanwhile, the Group shall disclose AI governance status in accordance with regulations, including the categories of deployed systems, statistics of security incidents, and fairness monitoring results, and take the initiative to accept internal and external supervision.

VI. Primary Responsibility for Algorithm Security

The Group has established an Algorithm Security Management Committee to formulate a security management system covering the entire algorithm lifecycle based on actual business operations. A person-in-charge shall be designated for each launched AI system, who shall bear full responsibility for the compliance, security, and performance of the system throughout its lifecycle, and conduct at least one formal compliance review annually. The Group shall clarify the responsibility boundaries and legal obligations of suppliers in terms of data security, model quality, and bias control through contracts to ensure traceability of responsibilities across the entire chain.

VII. Clear Definition of AI Capability Boundaries

The Group strictly defines red lines for the use of AI systems: AI diagnosis is prohibited from directly replacing physicians in signing diagnosis certificates; AI is prohibited from replacing physicians in issuing prescriptions; use of non-anonymized patient data for commercial AI training is prohibited. AI is allowed to be applied in compliance scenarios such as auxiliary ophthalmic image analysis, medical record structuring, operation optimization, and medical scientific research and teaching.

VIII. Low Ecological Footprint Commitment

The Group practices green and low-carbon development. In AI model selection, efficient and lightweight models shall be prioritized, and model compression and quantization technologies shall be encouraged to reduce computing power consumption and carbon emissions.

IX. Prohibition of Ethically High-Risk AI Systems

The Group commits that all launched AI systems have passed the review process required by the Group's *Science and Technology Ethics Review System*, and re-review shall be conducted in case of major changes. AI systems shall comply with the principles of science and technology ethics in their design and application, respecting human rights, dignity, and public interests. The Group shall not develop, procure, or deploy ethically high-risk AI systems.

X. Board Oversight and Governance

These Responsible AI Principles are reviewed and approved by the Board of Directors of Aier Eye Hospital Group Co., Ltd., implemented by relevant competent business departments, and subject to daily supervision and regular evaluation by the Group's Audit and Risk Control Center. The Principles shall be revised in a timely manner in the event of major adjustments to applicable laws, regulations, industry policies, and requirements, and major revisions shall be resubmitted to the Board of Directors for review and approval.