2026 Responsible AI Program

I. Purpose

To implement the Winbond Responsible AI Policy, the Company has established a Responsible AI Program to ensure that Artificial Intelligence (AI) is governed throughout its entire lifecycle—including adoption, development, procurement, usage, operation, and retirement—in a manner that is secure, transparent, fair, explainable, sustainable, and compliant with applicable laws and regulations. This program incorporates governance frameworks, risk management practices, training and awareness initiatives, technical controls, and continuous improvement mechanisms.

The objectives of this program are to:

- Implement Responsible AI governance principles.
- Reduce AI-related cybersecurity, privacy, compliance, and operational risks.
- Establish a trustworthy and reliable AI environment.
- Enhance employees' awareness and capabilities in AI ethics and security.
- Support the Company's ESG and sustainability objectives.

II. Scope

This Program applies to all AI systems and services that are used, developed, procured, or managed by **Winbond Electronics Corporation and its global subsidiaries**, including:

- Internally developed AI systems
- Third-party AI services
- Generative AI
- Agentic AI
- Low-Code/No-Code AI applications

The Program covers the entire AI lifecycle, including:

- Data collection and processing
- Model development
- System testing
- Deployment and implementation
- Operations and maintenance
- Retirement and decommissioning

III. Responsible AI Implementation Plan

1. Clearly Identify AI-Generated Content and AI Decision Outputs

Program Description

The Company shall promote the practice that AI-generated content, analytical results, or decision recommendations are subject to appropriate disclosure measures based on their risk level [DY1.1].

Implementation Measures

- Clearly indicate AI involvement in AI-generated outputs.
- Label documents that have been generated or assisted by AI.

- Provide appropriate explanations for AI-generated analyses and recommendations.
- Establish review and validation procedures for AI-generated outputs.
- Maintain human oversight and review mechanisms for significant decisions.

2. Monitoring and Remediating AI Model Drift and Degradation

Program Description

Establish a model performance monitoring and continuous improvement mechanism to ensure the accuracy, reliability, and effectiveness of AI models throughout their lifecycle.

Implementation Measures

- Establish model performance baselines.
- Regularly monitor model accuracy and reliability.
- Define alert thresholds for model drift.
- Establish model retraining procedures.
- Implement model version control and tracking mechanisms.

3. Periodic Assessment of AI Model Fairness and Bias

Program Description

Reduce the risk of bias and unfair outcomes arising from training data, algorithms, or model design.

Implementation Measures

- Implement fairness assessment mechanisms.
- Evaluate data representativeness and potential bias risks.
- Conduct bias testing for high-risk AI systems.
- Establish bias remediation and improvement processes for traditional machine learning models [DY1.1].
- Periodically review the reasonableness of outputs generated by traditional machine learning models [DY2.1].

4. Reducing the Environmental Footprint of AI Data Centers and Models

Program Description

Incorporate sustainability considerations into the planning, development, and deployment of AI systems.

Implementation Measures

- Assess the energy consumption of AI models.
- Prioritize the adoption of energy-efficient AI models.
- Leverage shared cloud services to reduce redundant infrastructure.
- Evaluate the ESG performance of AI solutions.
- Include sustainability criteria in supplier evaluation and management processes.

5. Establishing a User and Stakeholder Complaint Mechanism

Program Description

Establish a transparent and traceable mechanism for AI-related complaints, feedback, and continuous improvement.

Implementation Measures

- Integrate AI-related complaints into the Company's Help Desk service process.
- Establish investigation and response procedures.
- Subject high-risk cases to cross-functional review.
- Implement corrective and preventive action (CAPA) tracking mechanisms.

6. Measuring the Impact of AI on Sustainability Outcomes

Program Description

Establish an AI value measurement framework to evaluate the impact of AI on Environmental, Social, and Governance (ESG) objectives.

Implementation Measures

Environmental (E)

- Improved energy efficiency
- Reduced carbon emissions
- Optimized resource utilization

Social (S)

- Enhanced operational efficiency
- Reduced manual workload and labor hours
- Improved employee AI capabilities

Governance (G)

- AI risk management maturity
- Percentage of AI projects under governance oversight
- Responsible AI compliance level

7. AI Ethics and Security Awareness Training Program

Program Description

The Company shall establish an **AI Ethics and Security Awareness Training Program** to foster Responsible AI awareness and AI governance capabilities among all employees. As a key component of the Company's AI governance framework, the program will utilize structured training courses, awareness campaigns, and periodic assessments to enhance employees' understanding of AI ethics, cybersecurity, privacy protection, intellectual property rights, and regulatory compliance.

The program will also strengthen employees' ability to identify and respond to emerging AI-related risks, including Generative AI, Agentic AI, AI hallucinations, Prompt Injection attacks, Shadow AI, and the protection of sensitive information. This will help ensure that AI applications comply with the Company's Responsible AI Policy, information security requirements, and evolving international regulatory expectations, thereby fostering a trustworthy, secure, and sustainable AI ecosystem.

Implementation Measures

- Establish a company-wide Responsible AI awareness and capability development program.

- Deliver training and awareness initiatives covering:
    - Responsible AI Policy
    - AI Ethics
    - AI Bias and Fairness
    - Personal Data Protection and Privacy
    - Intellectual Property Rights
    - Risks Associated with Generative AI Usage [DW3.1]
    - Agentic AI Risks
    - AI Cybersecurity Risks and Protection Measures
    - Prompt Injection and Prompt Security
    - AI Hallucination Risks
    - Sensitive Data Protection and Data Classification Requirements
    - Human Review Principles for AI Outputs
    - Third-Party AI Service Usage Requirements
    - Shadow AI Risk Management
    - AI Incident Reporting and Response Procedures
    - AI Regulations and Corporate Governance Requirements

8. AI Governance Validation and Continuous Improvement

Program Description

The Company will continuously assess and enhance its AI governance maturity to align with international best practices and applicable regulatory requirements.

Implementation Measures

Status: Completed

- Established the **Winbond Responsible AI Policy**.
- Established the Group Responsible AI Governance Framework.
- Established AI governance roles and responsibilities [DW4.1].
- Established AI usage guidelines and awareness mechanisms.

Status: In Progress

- AI risk assessment and classification framework.
- AI incident management and tracking mechanism.
- AI governance metrics and performance management framework.

Status: Continuous Improvement

- Conduct annual reviews of policy effectiveness and regulatory compliance.
- Conduct periodic AI education and awareness training.
- Continuously improve AI governance maturity.
- Monitor and evaluate the effectiveness of corrective and improvement actions.