

## Responsible Use of Artificial Intelligence at the Elecnor Group

The Elecnor Group understands Artificial Intelligence (AI) as a technology with great potential to improve the efficiency, safety, quality of service and sustainability of its activities. Its implementation is always carried out in a responsible, secure and transparent manner, in line with the Group's corporate values, applicable regulations and the expectations of its stakeholders.

The organisation believes that AI must serve people, safety, efficiency, sustainability and the creation of responsible value. It therefore promotes the responsible use of these technologies, encouraging the training of its professionals, the continuous assessment of associated risks and benefits, and the adoption of best practices that enable the potential of AI to be harnessed in an ethical, safe and sustainable manner.

The Elecnor Group bases its actions regarding AI on the following core principles:

### 1. Governance, control and responsible use of AI

The Elecnor Group applies governance and control criteria to the use of AI-based solutions, particularly those capabilities with the greatest impact on people, privacy, security or decision-making.

The use of advanced analytics, recognition, surveillance, automated decision-making or intensive data processing tools is restricted exclusively to authorised personnel. Their application must serve legitimate, proportionate and pre-assessed purposes.

This control helps to reduce the risks of misuse, protect confidential information and ensure compliance with the Group's ethical and legal principles.

### 2. Transparency and human oversight

Transparency is the foundation for building trust in the use of AI. The Elecnor Group ensures that content generated or results derived from automated processes are identifiable by users, recipients or affected individuals, thereby avoiding confusion and facilitating their interpretation. Consequently, clear notification is provided when a person interacts with an automated system or when content, a recommendation, an analysis or a decision has been produced with the support of AI.

Furthermore, key decisions do not rely exclusively on automated systems without adequate human oversight. In cases such as incident prioritisation, document classification or the provision of technical recommendations, the result is reviewed by qualified professionals before decisions with a significant impact are taken. The Elecnor Group also has channels in place for requesting clarifications or reviews of results.

### 3. Quality, reliability and continuous improvement of models

AI systems can lose accuracy over time due to changes in data, business processes or the operational context. For this reason, the Elecnor Group implements mechanisms for monitoring and continuous improvement, which include regular performance monitoring, reviewing anomalies, detecting deviations, and updating or retraining models. The aim is to ensure that AI tools remain reliable, useful and fit for the purpose for which they were implemented.

### 4. Fairness, absence of bias and protection of individuals

The Elecnor Group recognises the risk that AI systems may reproduce existing biases in the data if they are not properly designed, used and supervised. Consequently, the evaluation of AI models and tools is promoted from a perspective of fairness, proportionality and non-discrimination, identifying potential biases and differential impacts that may affect individuals or groups.

These reviews are intensified in key areas such as people, security, compliance, recruitment, training, assessment, customer service and service provision, ensuring that no unjustified exclusions or differences are introduced.

### 5. Security, privacy and ethical use by employees

The responsible use of AI requires Elecnor Group staff to be aware of its capabilities, limitations and risks. The Group promotes awareness and training among its professionals in the ethical, safe and appropriate use of these technologies, covering the protection of personal data, information confidentiality, cybersecurity, intellectual property, critical review of results, prevention of bias, and the proportionate use of generative or analytical AI tools.

This approach enables employees to make informed decisions to avoid entering sensitive information into unauthorised platforms, to understand the limitations of AI-generated results, and to always maintain professional responsibility for the work carried out.

### 6. Sustainability and the environmental impact of AI

AI is a key ally for sustainability (by reducing travel, optimising processes and improving energy efficiency), but its storage and processing also generate energy consumption that must be rationalised.

The Elecnor Group promotes the efficient and proportionate use of AI, ensuring that the solutions implemented deliver real value and that their design, deployment and operation take into account criteria of efficiency, sustainability and the rationalisation of technological resource consumption.

This includes assessing, where appropriate, the efficiency of the infrastructure used, the use of technology services based on sustainability criteria, the optimisation of models and processes, and the measurement of the impact that AI initiatives may have on environmental or social objectives.

### 7. Measuring impact and contribution to sustainability objectives

The Elecnor Group promotes the evaluation of technological initiatives, including those based on AI, in terms of their impact, efficiency and contribution to the company's sustainability objectives.

When an AI solution is aimed at improving environmental, social or operational processes, indicators can be established to measure its results. These indicators may relate to reduced consumption, lower emissions, improved safety, process efficiency, fewer incidents, resource savings or improved service quality.

### 8. Review, verification and alignment with best practice

The Elecnor Group maintains a focus on continuous improvement in the areas of technology governance, cybersecurity, compliance and sustainability. In the field of AI, this approach includes the periodic review of internal practices, the identification of emerging risks and progressive alignment with recognised frameworks, standards and best practices regarding the responsible management of AI.

The company takes regulatory developments and applicable international standards as its reference, including the principles of transparency, security, accountability, human oversight, privacy, technical robustness and sustainability.

Where appropriate, the Elecnor Group may evaluate mechanisms for independent review, audit or external verification of its AI management systems, in line with recognised standards such as ISO/IEC 42001 or other equivalent frameworks.

This approach builds stakeholder confidence and helps to ensure that AI is implemented in a responsible and controlled manner, in line with the Elecnor Group's mission.