

OHLA Group is committed to innovation and digital transformation. Through this policy, the group follows the values defined in the Code of Ethics. The policy is made available to employees on the intranet and corporate website for mandatory compliance.

This policy promotes the efficient and responsible use of Artificial Intelligence (AI) within the OHLA Group, including the investee companies under the Group's effective control. By leveraging AI, we aim to improve productivity, optimize internal processes, and enhance competitiveness in an increasingly digitized business world.

This policy is mandatory for all OHLA Group staff, including directors and members of the Board of Directors, and any other third parties that may be affected.

The current policy seeks to set out the general principles for the design, development, and application of AI tools within the OHLA Group. These principles are:

- **Guidance for users and processes:** OHLA Group will help identify value-added AI and opportunities that add value to the company and will make available to its employees the technology, tools, and training necessary for efficient, responsible, ethical, and legally compliant use of AI.
- **Efficient technological strategy:** The resources dedicated to enabling AI in the OHLA Group, through the licensing of commercial tools and/or through in-house developments, will be governed by principles of optimization, adaptability, and orientation to assess cases of use. For this purpose, the need to implement or develop AI systems in OHLA Group must be analyzed in advance, justifying their purpose and benefit and avoiding the assumption of risks at all times. In no case shall OHLA Group staff implement or develop AI systems that are prohibited in accordance with the applicable regulations in the different geographies in which OHLA Group operates.
- **Ethical and responsible use:** This policy requires acting in accordance with the provisions set out in the current legislation on AI and refraining from any action that may affect fundamental rights or any other infringement or breach of the obligations under the applicable regulations. The Information Systems Management will ensure that IA systems are developed and implemented in a transparent manner with respect to non-discrimination, data privacy, and other rights that may be affected in this area. To this end, staff must always be informed of the planned deployment of high-risk AI systems in the workplace. The implementation of AI will also be managed considering its social and environmental impact, balancing technological innovation with environmental care responsibility. Staff will be responsible for using AI tools in accordance with these principles.
- **Traceability and transparency:** Full documentation of the algorithms, data processes, and methodologies used will be maintained (Documentation and Accountability). All stakeholders shall be informed clearly and accessibly about how AI is used and how it affects operations and decisions (Clear Communication).
- **Security, privacy, and data protection:** Compliance with the legislation on privacy and protection of personal data is guaranteed, informing data owners of the processing of their data, the purpose for their collection and processing, and the safeguarding of their data privacy rights. Furthermore, cybersecurity measures will be implemented with the explicit goal of guaranteeing the integrity, confidentiality, and availability of the information in AI systems to prevent attacks, detect possible vulnerabilities, and respond effectively to security incidents.

The Information Systems Management is responsible for supervising compliance with the provisions set out in this Policy by conducting internal and external audits and periodically reporting to the Artificial

Intelligence Committee or any other internal body designated to regulate the adoption of AI within OHLA Group.

This Policy shall be subject to **revision, continuous improvement, and further regulation**, taking into account the advances, innovations, and risks identified in relation to the matter and, especially when regulatory, social, business or any other circumstances so require.

OHLA Group's staff is under the obligation **to report any fact, act, conduct, and/or behavior contrary to this Policy**. The following reporting channels have been made available for this purpose:

Web: <https://ohla-group.com/en/ethical-channel/>

Intranet: OHLA-Link.com/Ethics complaints

Post: Care of: The Compliance Directorate - Paseo de la Castellana No. 259D, 28046 Madrid.

In-person: Upon request, with the OHLA Group Corporate Director of Compliance.

If you have questions, suggestions, or recommendations regarding this Policy, please get in touch with OHLA Group Information Systems Management.

Tomas Ruiz

Chief Executive Officer of OHLA Group