

DNE-POLI-01

POLICY ON THE RESPONSIBLE USE OF ARTIFICIAL INTELLIGENCE

Policy Holder: General Direction of Development and Business Support

Approved by / Date: July 24th 2025
Board of Directors ALEATICA SAU

Scope: It shall apply to all companies in which ALEATICA SAU has control.

Classification of the document: Public

Related and applicable documentation

Code	Name of the document
	Code of Ethics and Conduct
DCR-POLI-02	Anti-Corruption Policy
DPM-POLI-01	Regulatory and Quality Policy

Review	Brief description of the change

POLICY ON THE RESPONSIBLE USE OF ARTIFICIAL INTELLIGENCE

Artificial Intelligence (AI) is the integrated set of technologies, processes and structures - both hardware and software - that mimic human cognitive abilities to learn, reason and make decisions. Based on the analysis of large volumes of data, it adapts and intervenes with different levels of autonomy, generating results such as predictions, recommendations, content or decisions.

The implementation of AI has a significant impact on the improvement of processes, products and services. To meet the challenges presented by its use, a normative and governance framework for its implementation is essential.

The purpose of this Policy is to set out general principles, commitments and guidelines for action on the evaluation, acquisition, use, implementation, design, development, monitoring and decommissioning of AI systems.

The Policy sets out the principles to ensure ethical, responsible and transparent use, aligned with the values and objectives of ALEATICA and in compliance with applicable legislation. The use of AI must comply with the law (legal and regulatory provisions), and to the Norms established internally by ALEATICA or recognized as applicable by third parties.. It must be responsible, guaranteeing human rights, fundamental freedoms and human dignity, as well as diversity and inclusion.

From a technical and social perspective, AI systems developed or used in ALEATICA must be useful and robust and must comply with the standards set by ALEATICA in terms of cybersecurity, information security, as well as personal data protection when using personal information.

The principles and commitments that govern ALEATICA are:

- **Principle of respect for human beings and social welfare:** AI systems shall be acquired, developed and used as tools at the service of people, with full respect for human dignity and the environment. ALEATICA shall ensure the responsible use of AI tools, in compliance with ALEATICA's commitment to human rights, by facilitating that their design and use can be controlled and monitored by human beings. In any case, particular attention will be paid to ensure that AI systems do not harm health and safety or may have a negative impact (e.g. 'bias') on the fundamental rights of individuals.
- **Principle of diversity, non-discrimination and equity:** Efforts shall be made to ensure that AI systems are developed and used in ways that promote equal access, gender equality and cultural diversity, while avoiding bias with discriminatory effects (on the basis of race, ethnicity, religion, gender, sexual orientation, disability or any other status of persons) and unfair prejudice.
- **Innovative culture principle:** The design, development and implementation of systems using AI must be aligned with ALEATICA's innovation strategy, which aims to keep ALEATICA at the forefront of new technologies and disruptive business models, fostering a "culture of innovation" and continuous improvement that permeates the entire organisation and promotes motivating work environments that encourage and reward the generation of ideas.

- **Privacy and data protection principle:** It shall be ensured that AI systems are developed and used in accordance with privacy and data protection legislation across ALEATICA's applicable jurisdictions.
- **Principle of transparency:** AI systems shall be developed and operated in a way that allows for adequate traceability and transparency, ensuring that users are aware that they are communicating or interacting with an AI system, and to this end shall duly inform the persons concerned about the capabilities and limitations of the AI system, as well as their rights.
- **Principle of security and resilience:** AI systems shall be developed and operated in such a way as to minimise unintended and unexpected damage and to be resilient to unauthorised attempts at access, disruption of use or performance, and unlawful use by malicious third parties, while ensuring continuity of service provision.

Physical, technical and logical security systems and mechanisms shall be in place to protect and ensure the proper functioning of AI systems against any alteration, misuse or unauthorised access (whether physical or cybernetic), as well as to guarantee the integrity of the data stored or transmitted through them. ALEATICA may not develop or operate AI systems that are prohibited by applicable regulations or that are classified as such in this Policy.

- **Training and awareness-raising principle:** Training and education shall be provided to all employees so that legal, ethical, and behavioural considerations that apply to ensure the safe use of data and associated technology are taken into account in any process of ideation, pre-selection, and potential use of AI systems.

In addition, it will be ensured that designers and developers of AI systems are trained in all aspects necessary to understand the risks involved in the use of these systems, such as legal and ethical considerations, behavioural aspects and best practices in computer security, so as to ensure that the end-user of AI systems can make appropriate and safe use of them.

PROHIBITED PRACTICES

The use of AI systems that do not comply with the mentioned principles, as well as those that violate current regulations, is prohibited. This also includes the introduction onto the market, commissioning, or use of an AI system that uses subliminal or manipulative and deceptive techniques to take advantage of people's vulnerabilities or that evaluates their behaviour (emotions, etc.), producing a harmful effect, or that use biometric techniques for classification purposes based on race, politics, religion, sexual orientation, etc., and where it cannot be guaranteed that the data used is securely stored in accordance with ALEATICA's normative documents.

SUPERVISION

The IT and Systems Executive Direction will develop the necessary processes to ensure the correct use of AI and the management of potential risks arising from its use.

To achieve the objectives set out in this Policy, ALEATICA has an Artificial Intelligence Committee led by the IT and Systems Executive Direction. This Committee will periodically report to the Audit and Risk Committee regarding the status of the AI systems inventory in compliance with applicable normative and legislation, identified risks, and support required to resolve deviations from the provisions of this Policy.