



Artificial Intelligence Policy

Enagás, S.A. ("Enagás" or the "Company") recognises the importance of artificial intelligence and data-based algorithms (hereinafter, "AI") within the company's Digital Transformation Plan and as a facilitator for the fulfilment of the Strategic Plan, highlighting the benefits that this technology can bring, such as improvements in efficiency and process automation, among other aspects. Enagás is also aware of the importance of promoting the good, socially responsible and ethically acceptable use of artificial intelligence, minimising the risks and abuses that these technologies can cause. In this regard, Enagás is committed to using AI ethically, safely and responsibly at all stages of its value chain. Likewise, it undertakes to identify and analyse the possible associated risks, guaranteeing that, in each addition and/or development, it will request all relevant information necessary for decision-making and mitigation of the risk that the use of AI may entail.

This policy establishes the principles of action that must govern the design, development and use of AI by the Company, ensuring compliance at all times with the European Regulation on Artificial Intelligence, as well as with the Code of Good Practice for General Purpose Artificial Intelligence Models drawn up by the European Commission and the Council of Europe Convention on Artificial Intelligence, Human Rights and Democracy, the general principles established by AESIA (the Spanish Artificial Intelligence Supervisory Agency) and the National AI Strategy, current law, as well as with Enagás' strategy, values and governance culture based on the ethical commitments of its Code of Ethics. This policy aims to ensure safe, transparent, ethical and reliable use of AI tools by the Company.

This policy is applicable and communicated to all professionals and directors of the companies that make up the Enagás Group, including investee companies over which it has effective control, within the limits set out in the applicable regulations. In those investee companies in which the Enagás Group does not have effective control, the Board of Directors will propose the promotion of principles and guidelines consistent with those established in this Policy.

The company will also promote the application of the principles of this Policy as far as possible in respect of temporary joint corporate ventures, joint ventures and other equivalent associations or entities. In the case of contractors, suppliers and those collaborating with Enagás or acting on its behalf, Enagás will promote principles and commitments consistent with this policy, with particular emphasis on the supply chain.

Commitments

Enagás establishes the following commitments and principles of action in relation to the design, development, application and use of AI tools by the Company.

The incorporation and/or development of AI systems in the Company should be analysed beforehand, ensuring that their necessity is duly justified for the intended purposes or objectives, thus avoiding the assumption of unjustified risks of damage. The development and use of AI systems prohibited under the European Artificial Intelligence Regulation shall be categorically rejected.

- Principle of sustainability and efficiency: AI systems should be geared towards serving professionals and society, driving inclusive growth, sustainable development and general welfare. It will work in line with the achievement of the Sustainable Development Goals (SDGs) set by the United Nations (UN) and do no harm to the environment. The environmental impact of infrastructure and AI use must be considered, and efficient models must be used in design and implementation.
- Principle of diversity, non-discrimination and fairness: Artificial Intelligence systems must treat all professionals fairly and equally. Particular attention will be paid to avoiding biases in both data collection and data handling, as well as in the training of AI algorithms and tools, taking special care not to increase or replicate existing biases and social inequalities.
- Principles of traceability, transparency and comprehensibility: AI systems shall be developed and used in such a way as to ensure transparency at all stages of data management, from data collection, storage, processing and use of the data used by AI. The results and performance of AI will also be objectively verified through audit procedures. In this regard, AI systems must be governed by responsible disclosure, allowing professionals to know when they are interacting with them, the rights they are entitled to, and the opportunity to object to the results of such interaction.

In view of the fact that AI systems are complex technologies with a potential impact on people's fundamental rights, they must be explicable. This means that the understanding and interpretability of AI systems shall be facilitated: the understanding of how they work, their decision process and the results provided by the system through simple, accessible and understandable information.

A record shall be kept of the algorithms that use AI and that are used in Enagás, explicitly indicating their purpose or purposes. These records will be made available in a transparent and accessible manner at the request of the competent authority.

- Principle of security, privacy and data protection: Personal data will be protected, data leakage will be prevented and transparency in data collection will be assured. Appropriate cybersecurity measures shall be implemented to ensure that AI systems operate in a robust and reliable manner throughout their lifetime,

with the aim of protecting data integrity, availability and confidentiality. These measures shall have the additional objective of preventing the alteration, malicious exploitation and/or unauthorised access to the data, ensuring that the data are relevant, representative, correct and complete. Privacy and data protection legislation will be complied with when collecting and using personal information. Data subjects shall be informed of the nature of the data collected, the purposes for which it will be used and the information necessary for them to exercise their rights within the applicable legal framework.

- Principle of supervision and autonomy: AI systems shall allow their operation to be monitored by natural persons, ensuring that the system has built-in operational limitations that the system itself cannot disable, that it responds to the commands of the human operator. In addition, it shall be ensured that the natural persons entrusted with the task of human supervision have the necessary competence, training and authority to perform that function.

In this regard, the professionals and groups that declare or are found to have been affected by the results of AI system algorithms must always be able to challenge such results in a swift and easily accessible manner. AI systems must provide functionality to achieve this purpose.

AI systems must prioritise the well-being of professionals and protect their right to retain the power to decide what decisions to make and to exercise freedom of choice when necessary. Humans must retain the power to ultimately decide which decisions to make and which to delegate to AI systems.

- Principle of collaboration: Collaboration shall be encouraged between different actors, such as governments, business, academia and civil society, which is essential to address the ethical challenges of AI effectively. Cooperation between public and private entities is key to establishing ethical standards and regulations.
- Principle of training and awareness-raising: we will ensure that the Company's professionals are aware of the potential of AI to generate economic and social value, fostering technological empowerment and a culture of innovation responsible for promoting motivating work environments, encouraging the generation of innovative ideas and safeguarding ethical principles. In addition, it shall be aligned with the strategy and business objectives in a manner consistent with the context in which the Company's activities are carried out.

Furthermore, in accordance with the Code of Best Practices for General Purpose Artificial Intelligence Models, approved by the European Commission on 10 July 2025, as a reflection of the Company's commitment to adopting best practices in this sphere, Enagás has undertaken the following commitments:

- In terms of transparency obligations, the Company undertakes to consult the documentation provided by the AI provider, to use the AI model within the limitations and intended uses, and to keep a record of the integration and application of the model in its processes.

- In relation to copyright obligations, Enagás undertakes to strictly comply with the conditions of use of the model, not to use outputs that may infringe intellectual property rights and to report any incidents to the corresponding supplier.
- In terms of safety and security-related obligations, the Company undertakes to follow the mitigation and safety instructions provided by the supplier, to report any incident detected during the use of the model and to implement the indicated corrective measures.
- In terms of cooperation in the supply chain and with third parties, the Company is committed to actively engage with upstream suppliers of the AI model and downstream integrators, ensuring that technical documentation, risk assessments and safety reports required to comply with applicable regulations are shared and received in an appropriate manner.

Likewise, in relation to the Council of Europe Convention on Artificial Intelligence, Human Rights and Democracy, approved on 17 May 2024, Enagás undertakes to conduct a risk analysis of Artificial Intelligence systems in terms of human rights.

Management Model

Enagás has established a single data management and AI use model for the entire company, aimed at complying with the principles described in this policy, which can be summarised in the following elements:

- The adoption of measures that allow for self-regulation of the use of AI tools by establishing an ethical impact assessment model, so that any project involving the use of data through AI algorithms must carry out a prior analysis on:
 - The quality of data sources: representativeness, accuracy, specificity and relevance (to avoid bias).
 - Secure and ethical algorithmic processing of data (to avoid discrimination and exclusion).
 - Personal data protection, in strict compliance with current law.
 - The absolute ruling out of the development of prohibited applications.
- Human oversight mechanisms that allow a professional or professionals with authority and responsibility in the Company to take control of the decisions produced by an algorithm at any stage of the decision-making process, including the ability to reverse decisions taken automatically.
- A process of continuous review and updating of the AI management model to adapt it at all times to the Company's context, as well as to the law and recommendations and best practices.

- Mechanisms to react to any incidents that occur during the management of the system and the operational procedures that depend on it.
- The development of internal regulations on the use of Artificial Intelligence tools to regulate the commitments and actions summarised in this Policy.

The Board of Directors, through the Audit and Compliance Committee, is the body responsible for the design, orientation and control of the AI strategy and policy, as well as for proposing those internally responsible for the management model in the company's operations.

The Cybersecurity and AI Committee is the body responsible for overseeing, coordinating and validating the company's cybersecurity and AI strategy, policies and risk management

In addition, the Ethical Compliance Committee will supervise compliance with regulations and ethical principles in this area.

The existence of a whistle-blowing channel (ethics channel), accessible both to professionals and to third parties with whom Enagás has professional relations (suppliers, contractors, customers, partners, local communities, associations, etc.) and the establishment of a procedure for managing notifications and queries regarding irregularities or breaches of the Code of Ethics and the rules and policies that inspire or implement it, the operating principles of which are described in the Enagás Code of Ethics and in the Internal Reporting System Policy.

This policy was approved by the Board of Directors of Enagás on 20/10/2025.