

POLICIES FOR THE USE OF ARTIFICIAL INTELLIGENCE

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1. Subject matter

The purpose of this policy is to establish the principles and commitments of AMPER S.A. and the companies of its Group for the responsible, transparent, safe and ethical use of artificial intelligence tools (hereinafter referred to as “IA”) in accordance with Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 laying down harmonized rules on artificial intelligence and applicable data protection legislation.

2. Scope and applicability

This Policy is of global application and binds all employees of the Amper Group, regardless of their position and function, as well as third parties who have access to generation AI technologies, or who participate in the use of generation AI tools or platforms of the Amper Group.

For this purpose, “Amper Group” means all companies in which AMPER S.A. is in a dominant or control position in relation to another undertaking which is in one of the following situations: (i) owns directly or indirectly a majority of voting rights; (ii) has the power to appoint or remove a majority of the members of the administrative body; (iii) has the power, under agreements concluded with third parties, to have a majority of voting rights; and (iv) has appointed a majority of the members of the administrative body with their votes.

3. Guiding Principles

The Amper Group has established an AI governance model, led by a AI and based on the following principles:

1. **Principle of legality and respect for fundamental rights:** ensuring that development and use of AI respects existing legislation and human rights;
2. **Principle of equity, inclusion and non-discrimination:** AI tools will promote compliance with the principles of equal opportunities, diversity, promotion of inclusion and sustainability, producing fair results and seeking to avoid unfairly discriminatory biases and impacts (on the basis of race, ethnic origin, religion, sex, sexual orientation, disability or any other status of persons) in their design, development or application. They should also take into account all human capacities, competencies and needs, and ensure accessibility, privacy, non-discrimination and equity;
3. **Principle of respect for Intellectual Property:** The use and development of AI will ensure that intellectual or industrial property rights are not violated. The use of elements generated or edited with AI, whether text, image, audio, or video, must be identified. Language Models (Large Language Model – LLM) should be trained only with data on which you have rights for this purpose;

4. **Principle of privacy and confidentiality:** The use of AI should ensure the confidentiality of Amper Group information, it is not permitted to enter confidential information, sensitive Amper Group information or personal data into external AI systems;
5. **Principle of Transparency:** Ensure that AI systems are understandable to human users and supervisors;
6. **Principle of Human Supervision:** Establish mechanisms to enable individuals intervene, monitor and reverse automated decisions where necessary;
7. **Data quality and traceability:** Use relevant, representative and unbiased data, maintaining detailed records throughout the system lifecycle.
8. **Safety and technical robustness:** Design AI systems to be fault resistant, manipulations and misuses;
9. **Principle of accountability and accountability:** Defining roles and responsibilities clear within the organization to ensure compliance with legislation and facilitate internal or external audits.

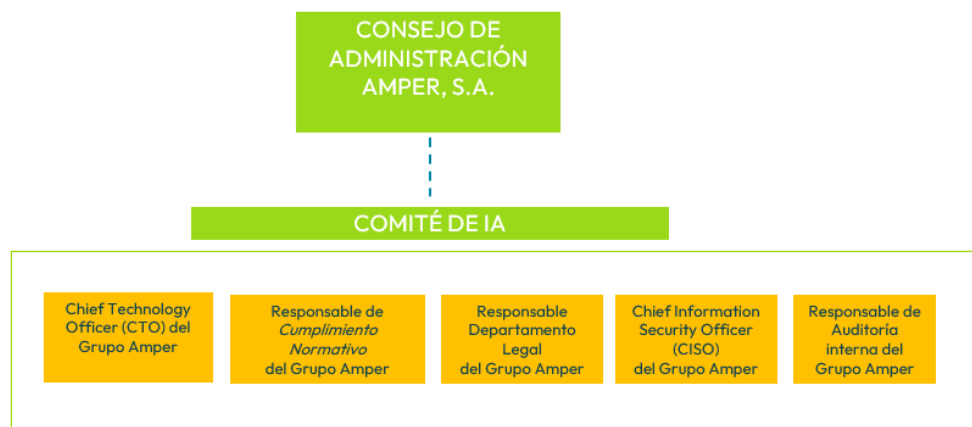
4. AI Tools

The Amper Group allows the use of any AI tools in accordance with the principles rectors, although the use of external AI tools is permitted, it is not permitted to enter confidential information, sensitive Amper Group information or personal data. Employees of the Amper Group will be able to use, for professional purposes and without restriction, the Corporate AI tool ("AMPER IA"), a generational artificial intelligence platform specifically designed to enhance efficiency, creativity and innovation throughout our organization.

5. Governance

The governance model is unique for all Amper Group companies in accordance with the following organizational chart:

Organisation chart of AI governance in Amper Group



The AI Committee is responsible for:

- Establish responsibilities, procedures, controls and measures to ensure correct configuration, administration and operation of Amper Group AI systems;
- Establish the necessary organisational, administrative and technical means for notification; recording, management, monitoring and resolution of management incidents in accordance with the AI Regulation;
- Have adequate resources to comply with the requirements of the legislation and regulation in force;
- Receive proposals for the use of Artificial Intelligence by business units and Corporate areas of the Amper Group;
- Assess the suitability of its use by the Amper Group in accordance with this Policy, and conduct risk assessments if necessary;
- Give consent to the incorporation of new AI solutions to be used in Group Amper or marketed;
- Manage records in European Union databases, if applicable;
- Communication with designated authorities such as the European AI Office, the Agency Spanish Supervision of Artificial Intelligence (AESIA) and other countries, if applicable;
- To consent to R & D activities containing AI;
- Report to the Board of Directors through the AMPER Audit and Control Committee S.A. on the main agreements it makes with regard to AI;
- Promote AI training.

The Amper AI Committee shall consist of:

- Chief Technology Officer (CTO) of the Amper Group, who takes the lead of the AI Committee;
- Responsible for the Legal Department of the Amper Group;
- Amper Group Regulatory Compliance Officer;
- Chief Information Security Officer (CISO) of the Amper Group
- The Amper Group's Internal Audit and Risk Management Officer participates with a role of advice from the AI Committee, providing recommendations, without intervening in decision-making.

In no case can decisions be made for the development, integration, sale, or use of AI systems without first consulting the AI Committee and obtaining their express consent.

It is mandatory to contact the AI Committee always in the following cases:

- When you start designing AI technology development or integration plans, either for placing on the market or for internal use;
- By completing the development of AI technology, before installing, taking off or marketing;
- At the time when there is an intention to acquire products or services from third parties that incorporate AI;
- At the start of the study of a bidding process containing AI requirements;
- During the merger and acquisition processes of companies that develop, market or use AI technology;
- When it is decided to use corporate systems (ERP, HR, CRM, marketing, etc.) that have AI functionalities, regardless of whether they are licensed or free of charge. Includes AI functionalities on social networks;
- Any doubts about the legitimate and responsible use of AI in the Amper Group.

Contact with the AI Committee will be via email at committee.ia@groupamper.com

6. Monitoring and Advertising

The Head of the Compliance Function of the Amper Group shall be responsible for: implementation and compliance with this Policy.

Likewise, timely communication of dissemination and internal communication will be carried out through existing tools, for their knowledge.

7. Entry into force

This Policy is approved by the Board of Directors of AMPER S.A. at its meeting held on 28 April 2026, entering into force at the same time as its adoption.

CHANGE CONTROL

Version	Summary of changes	Date
1.0	Initial Version	28/04/2026