Policy on the Responsible Development and Use of Artificial Intelligence Tools

25 March 2025

The Board of Directors of IBERDROLA, S.A. (the "**Company**") has the power to design, assess and continuously revise the Company's Governance and Sustainability System, and specifically to approve and update policies, which contain the guidelines governing the conduct of the Company, and furthermore, to the extent applicable, inform the policies that the companies belonging to the group of which the Company is the controlling entity, within the meaning established by law (the "**Group**"), decide to approve in the exercise of their autonomy.

In exercising these powers and within the framework of legal regulations, the By-Laws and the Purpose and Values of the Iberdrola Group, the Board of Directors hereby approves this Policy on the Responsible Development and Use of Artificial Intelligence Tools (the "**Policy**"), which respects, further develops and adapts the Ethical and Basic Principles of Governance and Sustainability of the Iberdrola Group with respect to the Company.

The development and implementation of artificial intelligence tools is an essential element for the sustainable creation of value, as well as for the Group's innovation and digital transformation strategy. The Company therefore recognises the importance of promoting the responsible use thereof, in line with its corporate philosophy and the principles that inform its corporate culture, based on ethics and the commitment to sustainability.

This Policy is aligned with the Recommendation of the Organisation for Economic Co-operation and Development (OECD) Council on Artificial Intelligence.

1. Scope of Application

This Policy applies to the Company. Without prejudice to the foregoing, this Policy includes basic principles that, in the area of the use and development of artificial intelligence tools, complement those contained in the Ethical and Basic Principles of Governance and Sustainability of the Iberdrola Group and, to this extent, must inform the conduct and standards-setting implemented by the other companies of the Group in this area in the exercise of their powers and in accordance with their autonomy.

To the extent that listed country subholding companies form part of the Group, they and their subsidiaries, under their own special framework of enhanced autonomy, may establish principles and rules that must have content consistent with the principles of this Policy.

To the extent applicable, these principles must also inform the conduct of the foundations linked to the Group.

For companies that do not form part of the Group but in which the Company holds an interest, as well as for *joint ventures*, temporary *joint ventures* (*uniones temporales de empresa*) and other entities in which it assumes management, the Company shall also promote the alignment of its regulations with the basic principles regarding the use and development of artificial intelligence tools contained in this *Policy*.

2. Purpose

The purpose of this Policy is to establish the main principles of conduct that are to govern the design, development and application of artificial intelligence tools, defined as any automated system designed to function with different levels of autonomy and which may, with explicit or implicit aims, generate results such as predictions, recommendations or decisions, which in turn influence physical or virtual environments.

It also has the purpose of regulating the responsible use of these tools, ensuring compliance with applicable law, the Purpose and Values of the Iberdrola Group, the Ethical and Basic Principles of Governance and Sustainability of the Iberdrola Group and the other rules that form part of the Company's Governance and Sustainability System.

3. Main Principles of Conduct

The Company will use artificial intelligence systems in a responsible, transparent, secure and reliable manner. To this end, it adopts and promotes the following main principles of conduct that must govern its activities regarding the design, development, application and use of artificial intelligence tools:

a. Principle of respect for human beings and social wellbeing

Artificial intelligence systems will be developed and used as tools in the service of people, fully respecting human dignity and the environment, in accordance with the technological state of the art at any time and so that they benefit all human beings.

The Company shall endeavour to use artificial intelligence tools responsibly within the framework of compliance with its commitment to respect for human rights, to the Purpose and Values of the Iberdrola Group and to the Ethical and Basic Principles of Governance and Sustainability of the Iberdrola Group, facilitating the possibility of people controlling and supervising their design and use.

In any event, the Company shall pay special attention to ensuring that artificial intelligence systems do not harm health or safety or have a negative impact on fundamental human rights.

b. Principle of equal opportunity and non-discrimination

The Company shall endeavour to develop and use artificial intelligence systems so that they foster equality of access, equal opportunity and diversity, at the same time as avoiding biases with discriminatory effects (based on any condition or characteristic, like race, ethnic origin, religion, or sexual or political orientation and unfair prejudice).

c. Principle of culture of innovation

The Company shall endeavour to ensure that the design, development and application of artificial intelligence tools are aligned with the innovation strategy, which seeks to keep the Company at the forefront of new technologies and disruptive business models, by encouraging a "culture of innovation" that pervades the entire organisation and promotes motivating work environments that favour and reward the generation of ideas and innovative practices.

d. Principle of privacy

The Company shall endeavour to ensure that artificial intelligence systems are developed and used in accordance with privacy and data protection laws, as well as with the Governance and Sustainability System, and process data that comply with established standards of quality and integrity.

e. Principle of transparency

The Company shall promote artificial intelligence systems being developed and used so that they permit adequate tracking and transparency, endeavouring to ensure that users are aware they are communicating or interacting with an artificial intelligence system, for which purpose it shall duly inform affected persons of such system's capacities and limitations, as well as of the rights that protect them.

f. Principle of security and resilience

The Company shall endeavour to ensure that artificial intelligence systems are developed and used so that they minimise involuntary and unexpected harm and are resilient against unauthorised attempts to access them or alter their use or performance, and against unlawful and malicious third-party use, ensuring continuity of service provision at all times.

The Company shall have hardware, technical and software security mechanisms to protect and foster the proper functioning of their artificial intelligence systems against any alteration, misuse or unauthorised access (physical or cyber), as well as endeavour to ensure the integrity of data that are stored or transmitted via those systems.

Without prejudice to the exceptions that may be established for well-founded reasons by the IT Division (or by such division as assumes the duties thereof at any time), they shall generally not develop or use artificial intelligence systems that are classified as high-risk pursuant to the standards established at any time.

g. Principle of training and awareness-raising

The Company shall endeavour to ensure that the developers of artificial intelligence tools receive training on all aspects required to understand the risks implicit in the use of those systems, such as legal and ethical considerations, behavioural aspects and best security practices, so as to ensure that the end users of artificial intelligence tools can use them safely.

4. Group-level Coordination

The IT Division (or such division as assumes the duties thereof at any time) shall act in coordination with the corresponding divisions of the country subholding companies and shall prepare the procedures required to ensure the proper use of artificial intelligence and the management of the potential risks arising from the use thereof.

5. Implementation and Development

For the implementation and monitoring of the provisions of this Policy, the Board of Directors is assisted by the IT Division (or such division as assumes the powers thereof at any time), which shall further develop the procedures required for such purpose and shall regularly report to the Audit and Risk Supervision Committee.

The IT Division (or such division as assumes the powers thereof at any time) shall review this Policy at least once per year to ensure that the content thereof conforms to the ongoing progress, innovations, risks and regulatory changes that are occurring in the area.

* * *

This Policy was initially approved by the Board of Directors on 10 May 2022 and was last amended on 25 March 2025.