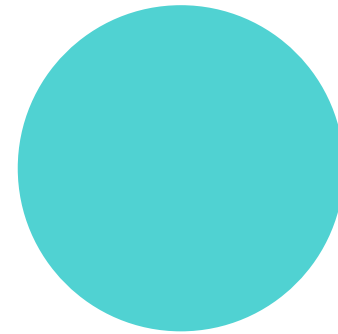
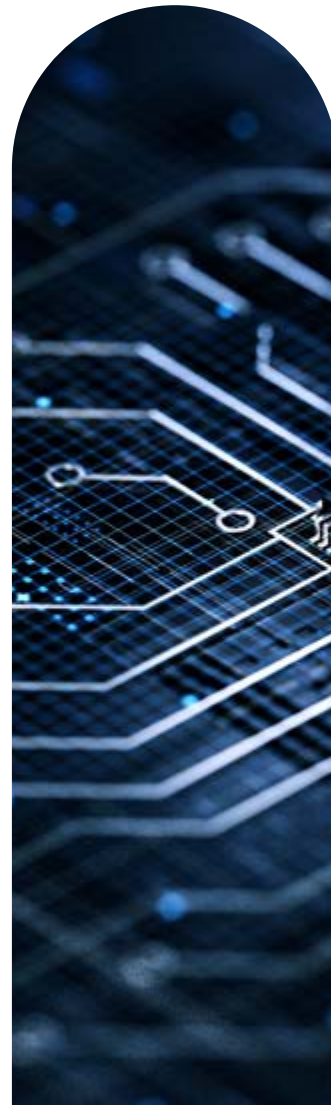


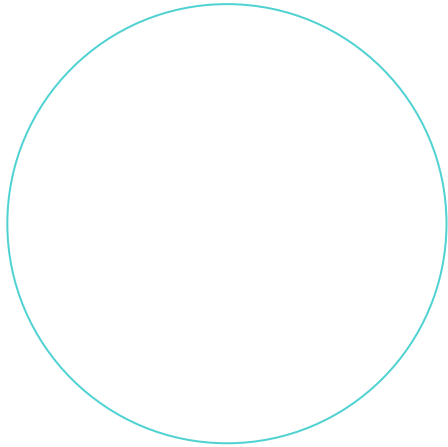
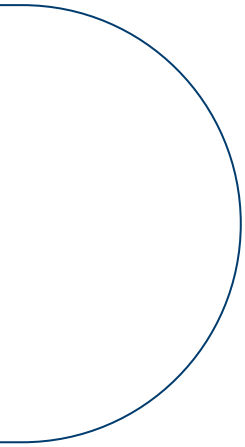
redeia

El valor de lo esencial

2026

Responsible Artificial
Intelligence Model





Responsible Artificial Intelligence Model

1 Introduction

At Redeia, we believe that artificial intelligence (hereinafter, “AI”) is a unique opportunity to advance towards a more efficient, sustainable, equitable, inclusive, and connected future, in which technology is developed with full respect for people and their dignity. Its capacity to transform the way we operate, make decisions, and interact with our environment makes it a key lever for the development of our activities and the generation of shared value for society as a whole.

With this in mind, in 2024, Redeia approved its Artificial Intelligence Strategy. This framework aims to leverage the full potential of this technology in a safe, reliable, equitable, responsible, and sustainable manner, integrating it across the organisation and aligning it with our ethical, social, and sustainability commitments.

This strategy is based on seven key lines of action (business value, compliance and responsible use, data, people, governance, security, and technology and innovation) that help manage AI in a complete way, balancing new ideas with responsibility, respect for people, and a positive impact on society.

In this context, Redeia’s responsible AI model constitutes the framework that ensures the development and use of AI within the company are carried out in accordance with our values and ethical principles, guaranteeing that:

- AI is used at the service of people and under human oversight, ensuring its benefits reach all groups without leaving anyone behind.
- Fundamental rights, privacy, diversity, and security are respected.
- Potential adverse impacts that AI systems may have on fundamental rights, human dignity, and the legitimate interests of stakeholders are prevented, mitigated, and, where appropriate, remedied.
- Transparency, equity, inclusion, and trust are promoted, avoiding biases and any form of discrimination.
- Sustainable, ethical, and socially responsible technological development is fostered.

“Our AI strategy seeks not only to transform the business, but to do so in a responsible, equitable, and inclusive manner, generating trust and value for society as a whole.”



2 Business valued

At Redeia, we use AI as a driver of transformation that allows us to improve our operations, anticipate challenges, and generate a positive and lasting impact on society. To achieve this, we work methodically, iteratively, systematically, and collaboratively with the different business areas to identify needs and opportunities in order to understand demand, identify the value each initiative can bring, and align it with the company's strategic objectives and the ESG¹ criteria that guide our actions.

In this process, we focus on solutions based on generative AI, which is changing quickly and needs a clear understanding of its scope, its potential effects in the future, and the reasons for its implementation. Furthermore, we encourage these initiatives to be accompanied by a rigorous cost-benefit analysis that facilitates informed, balanced decision-making aimed at creating sustainable value, guaranteeing that:

- AI systems are used as tools to support decision-making, always maintaining human control and oversight.
- The impact of AI solutions is systematically evaluated in economic, social, and environmental terms.
- Use cases with a positive impact are prioritised, avoiding disproportionate risks.

1) ESG (Environmental, Social, and Governance): a set of criteria used to assess the performance, ethics, and sustainability of organisations.

“Innovating with AI is moving forward, but doing so with purpose is transforming.”



What best practices have we adopted?

- Integration of AI into the improvement of operational processes and business decision-making, reinforcing efficiency, reliability, and service quality.
- Development of internal methodologies to assess the impact of AI initiatives on corporate results and sustainability.
- Identification and prioritisation of AI use cases aligned with the business strategy and ESG criteria, using multi-criteria scoring mechanisms that balance expected value, technical feasibility, risks, and technological maturity.
- Definition of a structured business case for each relevant initiative, including objectives, success indicators, expected return, and timeframe.
- Establishment of evaluation and prioritisation committees with representation from business, technology, risk, and compliance areas, ensuring a cross-functional and balanced view of the AI portfolio.
- Periodic review of the portfolio of AI initiatives, with criteria for continuity, scaling, or divestment based on evidence and measurable results.
- Capture and dissemination of learnings through internal knowledge management mechanisms, enabling the replication of best practices and preventing the recurrence of errors across projects.
- Incorporation of key metrics and indicators to measure AI's contribution to operational efficiency, corporate performance, and the achievement of sustainability goals.



3

Compliance and responsible use

At Redeia, the development, implementation, and use of AI systems is based on a firm commitment to compliance with applicable regulations and the adoption of the best national and international practices in this field. We understand that trust in technology is built on a foundation of responsibility, transparency, and accountability.

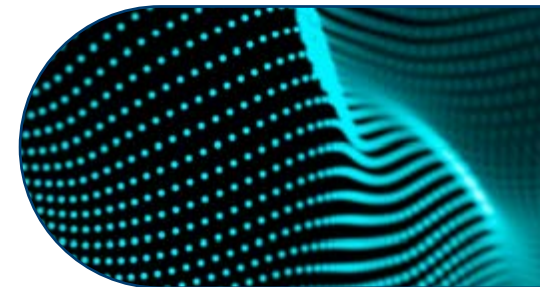
To this end, the company works proactively to identify, analyse, and apply current regulatory requirements, including the European Artificial Intelligence Act (AI Act), while also aligning with international reference frameworks such as the ISO/IEC 42001 standard on AI management systems and the NIST AI Risk Management Framework. This approach allows us to define and implement measures that ensure proper integration into business processes and the corporate governance model.

To complement this commitment, we promote the ethical, secure, and responsible use of AI. This way, we ensure continuous respect for fundamental rights, privacy protection, information security, and data quality, as well as human oversight of deployed systems.

We are committed to an AI that is fair, transparent, and respectful of people. This implies ensuring that systems do not generate discrimination, that their results are understandable, and that relevant decisions always involve human oversight. Furthermore, we work so that people can understand when they are interacting with AI and, where appropriate, question its results. This includes:

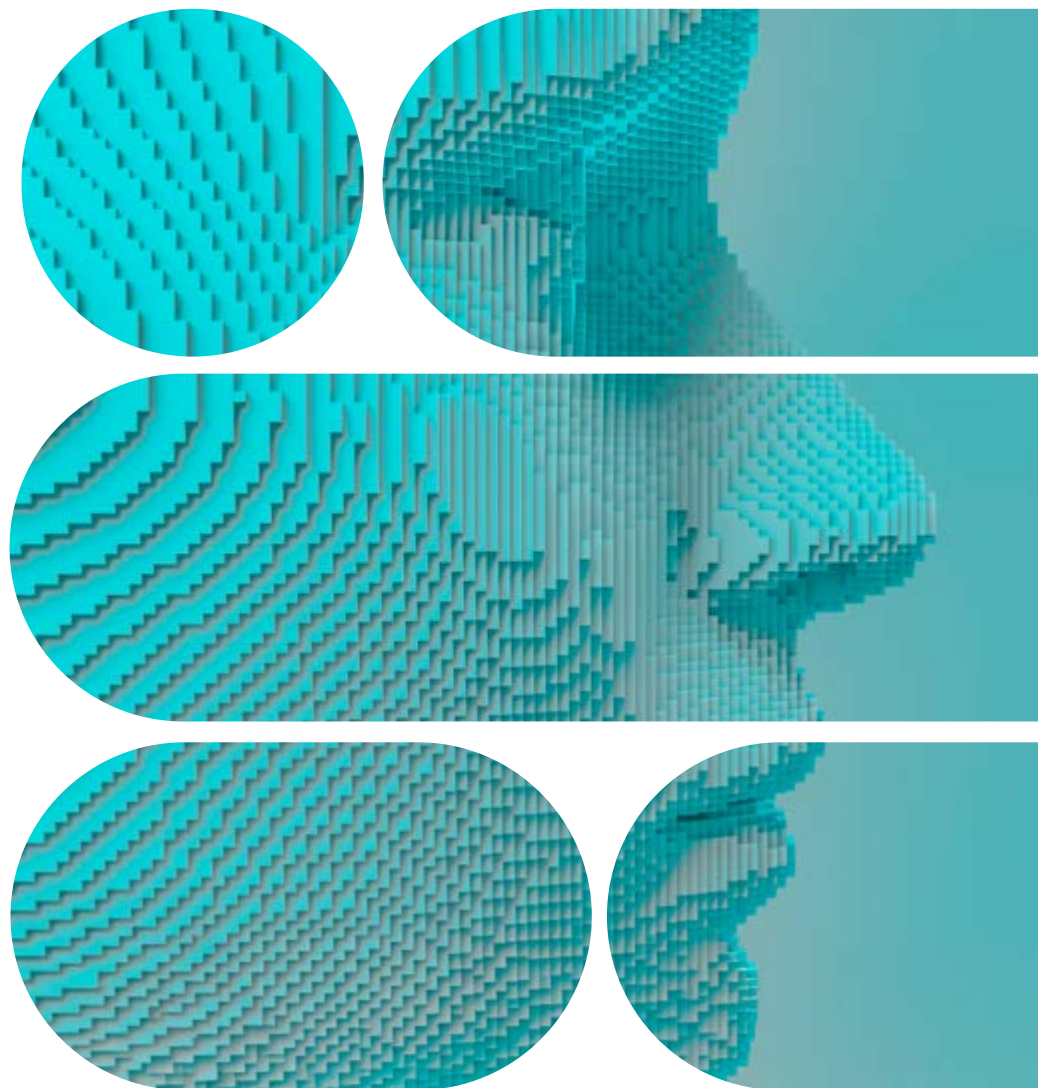
- The application of equity, non-discrimination, and equal opportunity criteria, through bias assessments in data and models throughout the entire lifecycle, including the analysis of third-party data and potential impacts on particularly sensitive or protected categories.
- When detected, the recording and proportionate communication to affected users or responsible parties of known biases that cannot be completely eliminated, as well as their control through additional measures.
- The implementation of transparency and explainability mechanisms, including the labelling of AI-based results and traceable documentation of the models used.
- The existence of human review and oversight processes proportionate to the risk level of each system, including the effective capacity to review, restrict, suspend, or override recommendations or results generated by AI when necessary.
- The limitation and control of the use of high-risk AI systems or those with sensitive capabilities, in accordance with the criteria established by the European Artificial Intelligence Act (AI Act) and applicable international standards.
- Conducting impact assessments prior to production deployment, especially for systems that may affect people, rights, working conditions, access to services, security, or relevant decisions.
- Continuous traceability and monitoring of the behaviour of models in production in order to detect deviations, degradation of results, or unforeseen impacts.

“Responsible AI is that which generates trust because it can be understood, evaluated, and, if necessary, questioned.”



What best practices have we adopted?

- Definition of basic responsible AI principles, approved by Redeia's Executive Committee, which guide all of the company's initiatives in this field.
- Development of a risk and compliance control map for AI, which is periodically verified to ensure the design and effectiveness of the defined controls.
- Definition of an internal procedure for the responsible use of AI by design and by default, which includes the risk classification of AI systems used at Redeia, in line with the methodology set out in the European Artificial Intelligence Act (AI Act).
- Implementation of criteria for labelling AI-generated content and outcomes of AI-driven decisions, ensuring transparency and the transmission of clear information to users.
- Establishment of an appeals process so that affected individuals can challenge AI-based decisions by incorporating features into AI systems that allow users to provide feedback and rate the results obtained. Additionally, Redeia's Ethics and Compliance Channel is established as an available mechanism to report any issues related to decisions made by AI systems, in line with Redeia's commitment to the responsible use of technology set out in our Code of Ethics and Conduct.
- Integration of high-risk AI system requirements into the corporate project development and management methodology, incorporating impact assessments prior to their deployment.
- Conducting an internal audit of compliance with legal requirements regarding Artificial Intelligence, carried out in collaboration with an external auditing firm specialised in this field, with periodic reviews that guarantee the continuous adequacy of the model.
- Development of training and awareness programmes aimed at the people who design, develop, or use AI systems, fostering a corporate culture of responsible use.
- Continuous assessment of third-party suppliers and solutions, ensuring that external AI tools meet the same standards of responsibility, security, privacy, transparency, equity, and oversight required internally, without diluting Redeia's responsibility for their use and the results produced.



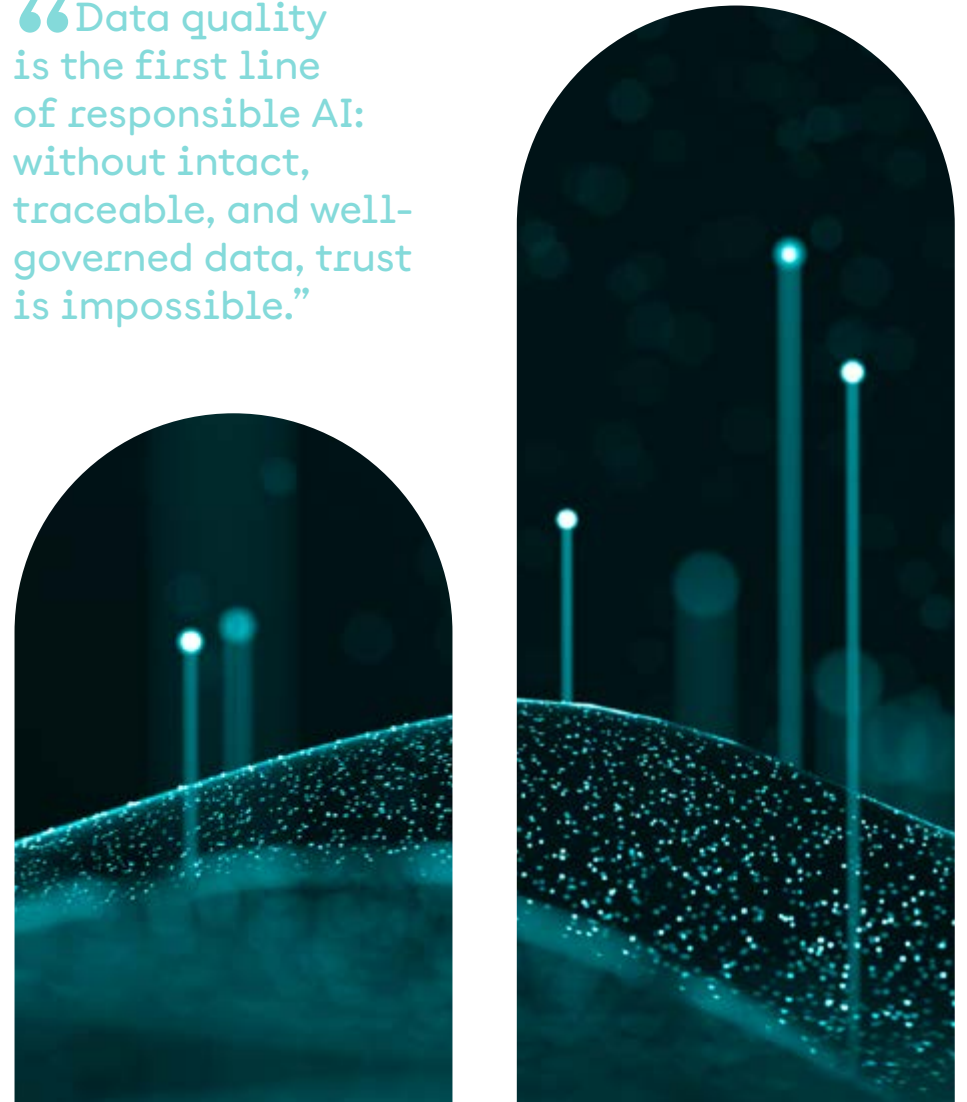
4 Data

Data is the foundation of any AI system. At Redeia, we understand that its quality, protection, traceability, and responsible use are essential to guarantee reliable, robust results aligned with our ethical principles.

Therefore, we work with a comprehensive view of data that combines quality, security, privacy, and governance, ensuring that AI systems generate accurate, up-to-date, representative, and useful information throughout their entire lifecycle. To this end:

- The quality, integrity, representativeness, and traceability of the data used in the training, validation, and operation of the models are ensured.
- The assumptions used in the system's design, the selection of variables, the definition of objectives, and the optimisation criteria are also reviewed, given that biases can arise not only from the data but also from hypotheses and design decisions.
- Confidential, personal, or sensitive information is protected, in accordance with current regulations and cybersecurity standards.
- When the use of personal data so requires, the existence of a suitable lawful basis and, where appropriate, clear, documented, and traceable consent mechanisms are guaranteed, especially in AI systems that may affect individuals or groups.
- Technical and organisational controls are established that guarantee reliable, accurate, reproducible, and auditable results.
- The behaviour of the models over time is monitored, detecting potential deviations, biases, or performance degradation.
- A company-wide data culture is promoted, based on shared responsibility between the business, technology, and governance areas.

“Data quality is the first line of responsible AI: without intact, traceable, and well-governed data, trust is impossible.”



What best practices have we adopted?

- Implementation of corporate data quality standards applied to AI models, aligned with reference frameworks such as the ISO/IEC 42001 standard (AI management systems).
- Development of continuous monitoring mechanisms to detect model drift or degradation.
- Reinforcement of personal and confidential data protection controls in AI projects, in compliance with the General Data Protection Regulation and applying privacy by design and by default principles.
- Integration of data governance practices throughout the complete lifecycle of AI systems, from capture and preparation to deployment, oversight, and retirement.
- Conducting regular audits on the quality and traceability of the data used, guaranteeing the reproducibility of results.



5 People

People are at the centre of our AI strategy. Our goal is not merely to integrate technology, but to leverage it to boost talent, enhance knowledge, and builds trust, placing the human factor at the very core of every initiative.

We believe that responsible AI requires informed, capable, and diverse people who are aware of its impact. In this way:

- AI literacy is fostered among all people in the organisation, ensuring an adequate level of understanding tailored to each role and responsibility.
- Awareness of the risks and opportunities this technology represents for our sector and our activity is promoted.
- An ethical and responsible culture in its use is promoted.
- Diversity in the teams that design, develop, and supervise AI solutions is guaranteed as an essential condition for building fair technology, free of biases, and representative of society.
- Technological transformation is accompanied by a firm commitment to employment and professional development.

“The best AI is the one that empowers people, not the one that replaces them.”



What best practices have we adopted?

- Development of a company-wide AI literacy and training plan, tailored to professional roles and maturity levels, covering ethical, compliance, and security standards for all members of the organisation.
- Execution of continuous awareness actions on the main risks associated with the use of AI, such as biases, misinformation, hallucinations, information leaks, technological dependence, or misuse, among others.
- Incorporation of content on responsible AI in internal training programmes, with special emphasis on the safe use of generative AI tools.
- Promotion of initiatives to develop advanced digital capabilities, including differentiated training paths for technical, managerial, and business profiles.
- Integration of AI into corporate culture and digital transformation programmes, ensuring its adoption is consistent with the organisation's values.
- Creation of multidisciplinary and diverse teams for the design, development, and evaluation of AI solutions, incorporating technical, business, ethical, legal, and user experience profiles, as well as criteria for gender, generational, and cultural diversity.
- Provision of internal consultation and participation channels so that employees can raise questions, propose use cases, report incidents, or suggest improvements related to the use of AI.



6 Governance

To guarantee the responsible, ethical, and safe use of AI, Redeia has developed a robust governance model that ensures adequate oversight in all phases of its lifecycle, from the conception of the initiative to its deployment, monitoring, and eventual retirement.

This model defines how AI systems are designed, developed, deployed, and used. It incorporates control mechanisms to anticipate risks, guarantee the traceability of decisions, and drive continuous improvement.

The fundamental pillars of our model are:

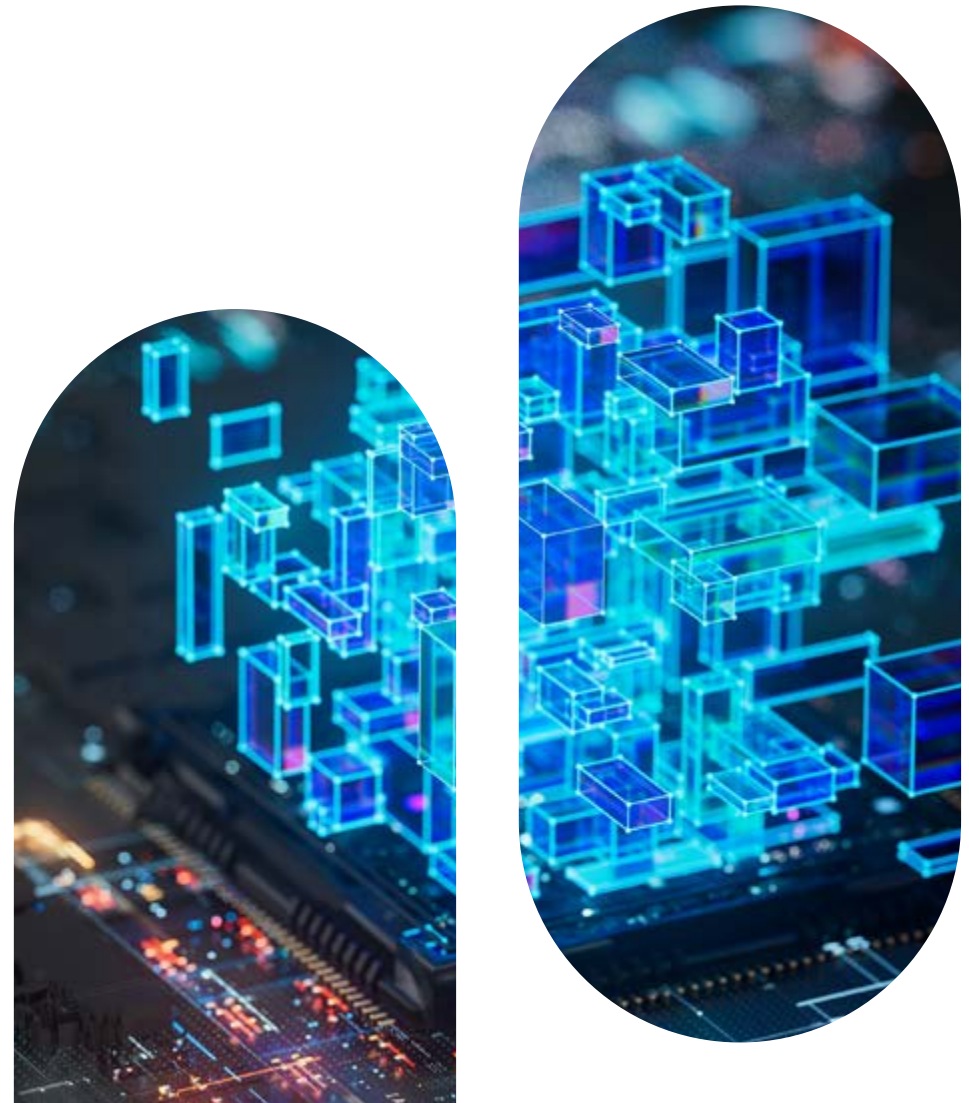
- Clear roles and responsibilities are defined throughout the entire organisation.
- The entire lifecycle of AI systems is comprehensively supervised.
- Specific risk management criteria for AI are integrated.
- Regular assessments of models in terms of performance, bias, and equity are carried out.

“Trust in AI is built with clear rules, oversight, and accountability.”



What best practices have we adopted?

- Creation of a corporate AI governance model, with functions assigned to the areas involved.
- Establishment of a multidisciplinary Artificial Intelligence Committee, responsible for overseeing the proper implementation of the AI strategy and compliance model, as well as its evolution based on environmental changes, results achieved, and best practices.
- Implementation of periodic model assessment processes, including bias and equity analysis.
- Integration of AI into the global risk management and compliance framework, aligned with international standards.
- Development of review and audit methodologies for AI systems.
- Corporate inventory of AI systems, which guarantees traceability and control over all ongoing initiatives.
- Provision of reporting and escalation channels to detect and manage system incidents or unexpected behaviour, supported by clear severity criteria, reporting timeframes, and assigned responsibilities. Where appropriate, these channels ensure the involvement of internal functions – such as security, privacy, and compliance – or the notification of regulatory authorities.
- Inventorying and classification of AI systems and models according to their risk level, with the assignment of roles and responsibilities in accordance with the European Artificial Intelligence Act (AI Act).



7 Security

Like any technology, AI opens up development opportunities and presents challenges in the area of security. For Redeia, security is a key element in the development and use of AI. Therefore, we work to ensure that our systems are robust, resilient, and secure against potential risks.

From initial design to operation, security is present throughout the AI lifecycle through the following elements:

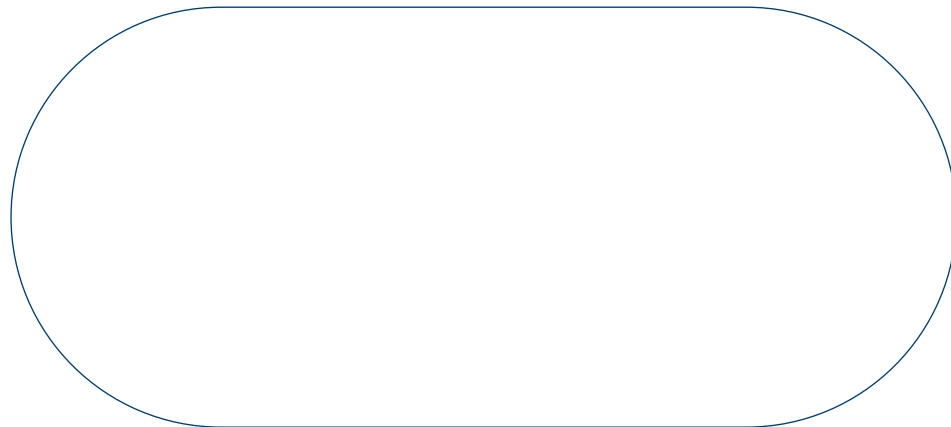
- Security by design principles are applied.
- Systems are protected against threats of any nature.
- The robustness and resilience of the models are guaranteed.
- Access to critical or sensitive systems is controlled.
- Human oversight of their operation is carried out.
- Alignment with the applicable regulatory and corporate framework is ensured.

“Secure AI is that which is designed to withstand, protect, and generate trust from the outset.”



What best practices have we adopted?

- Integration of security by design criteria into AI projects.
- Development of specific cybersecurity controls for AI systems.
- Implementation of access control mechanisms for sensitive tools and capabilities (e.g., biometrics or surveillance, among others).
- Execution of robustness and resilience tests on models.
- Coordination with corporate information security and cybersecurity functions.



8 Technology and innovation

At Redeia, we are committed to responsible innovation, combining technological development with respect for the environment and people. We understand artificial intelligence as a lever for transformation at the service of the common good, capable of generating sustainable value for society, our stakeholders, and the planet.

Our commitment is to drive AI solutions that, in addition to being effective, actively contribute to sustainability, the energy transition, and societal progress.

This commitment is also supported by collaboration with trusted third parties, including technology providers, universities, research centres, sector associations, and independent experts to reinforce the quality, security, sustainability, and responsibility of the adopted technological solutions. It takes shape through the following initiatives:

- Efficient, scalable, and sustainable technological solutions are developed.
- A culture of responsible innovation is fostered, placing people and the environment at the centre of technological decisions.
- The environmental, social, and ethical impact of the AI models we design, deploy, or acquire is systematically evaluated.

“Innovation
is only complete
when it is also
sustainable.”



What best practices have we adopted?

- Development of initiatives to reduce the ecological footprint of AI models and systems (both proprietary and third-party) through computational optimisation initiatives, algorithmic efficiency, and the proportionate selection of models before committing intensive training or deployment resources.
- Quantification of the environmental impact of AI-based technological solutions (both proprietary and third-party) on sustainability outcomes.
- Collaboration with suppliers to guarantee sustainable and responsible AI practices.
- Incorporation of sustainability criteria in the procurement of infrastructure, platforms, cloud services, and AI solutions, considering the energy consumption, computational efficiency, carbon footprint, and environmental commitments of suppliers.
- Promotion of innovation projects aligned with corporate responsible AI principles.
- Incorporation of energy efficiency criteria in the development and deployment of solutions, prioritising infrastructure powered by renewable energy.



9 Commitment to continuous improvement

Redeia's Responsible AI Model is a dynamic framework in continuous evolution, continuously adapting to regulatory, technological, and social changes, integrating them into the corporate culture. Therefore, the Model will be updated periodically to incorporate technological advancements, regulatory changes, internal learnings, and social expectations.

We continue learning, adapting, and incorporating new best practices to ensure that the use of artificial intelligence at Redeia remains an example of ethical, safe, and responsible innovation.



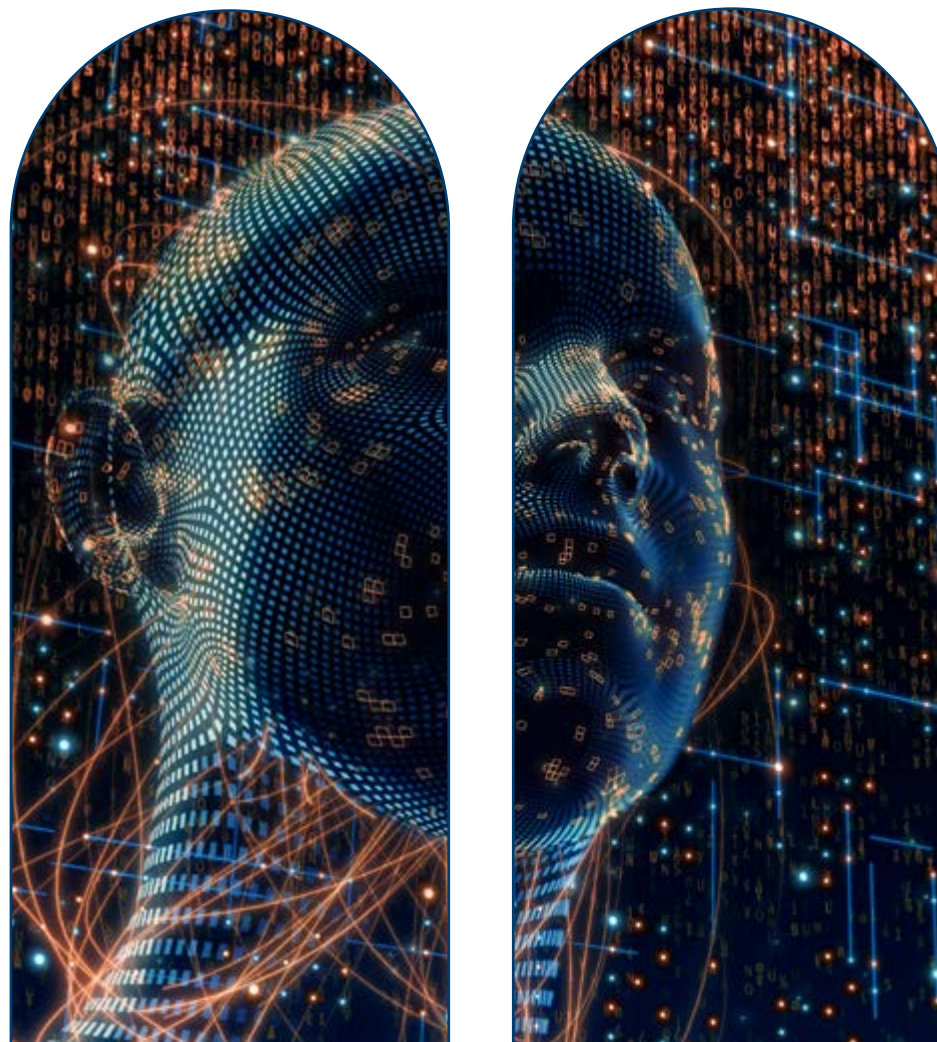
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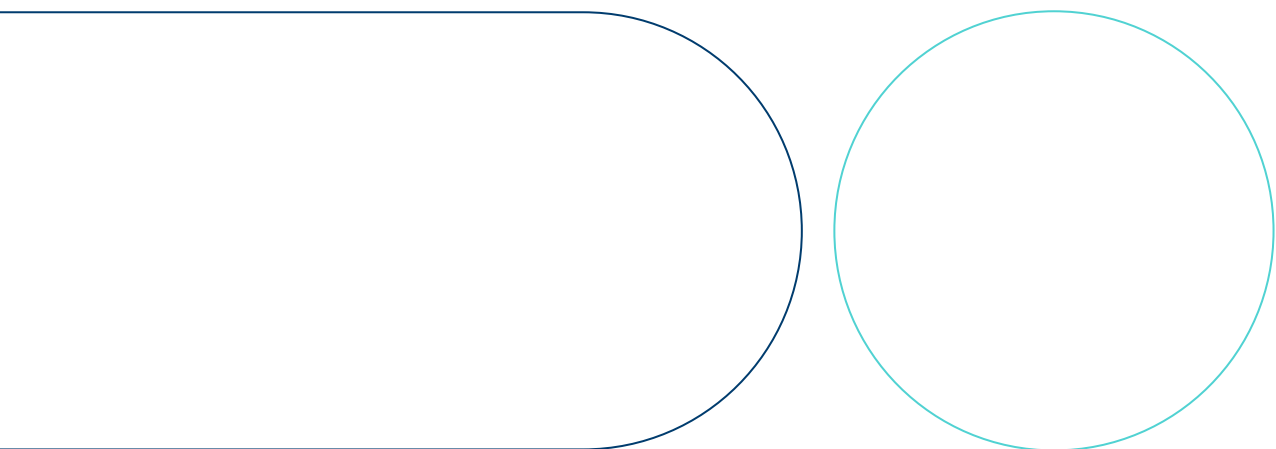
Conclusion

At Redeia, we understand AI as a tool at the service of progress. Our commitment is clear: to leverage its potential to generate value, always guaranteeing respect for people, security, and sustainability.

This Model reinforces Redeia's commitment to the use of AI that generates sustainable value, guarantees the protection of people, and contributes to safe, ethical, and inclusive technological development.

Because only then does innovation inspire trust. And only with trust is it possible to build the future.





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