



ARTIFICIAL INTELLIGENCE AND DATA SCIENCE POLICY

COLOMBINA GROUP

OBJECTIVE

To establish the principles, guidelines, and requirements for the responsible, ethical, transparent, and effective development, commercialization, and use of Artificial Intelligence (AI) and Data Science (DS) across the companies that comprise the Colombina Group. This Policy aims to support informed decision-making, enhance operational efficiency, foster innovation, and strengthen the trust of customers, employees, and other stakeholders.

SCOPE

This Policy applies to all individuals involved in the design, development, implementation, use, evaluation, or oversight of AI and Data Science systems within the companies of the Colombina Group, as well as to third parties that directly or indirectly participate in or support such activities.

DEFINITIONS

- **Artificial Intelligence (AI):** Artificial Intelligence refers to software developed using techniques such as machine learning, logical reasoning, and advanced statistical methods. AI systems are capable of generating outputs—including predictions, recommendations, or decisions—that influence the environments in which they operate.
- **Machine Learning (ML):** Machine Learning is a subset of Artificial Intelligence that enables systems to learn and improve from data without being explicitly programmed. ML algorithms identify patterns, make predictions, automate tasks, and support decision-making with minimal human intervention.
- **Model:** A model is a mathematical representation created through algorithms and trained using datasets to achieve specific objectives or perform designated tasks.



- **Data Governance:** Data Governance refers to the framework of principles, roles, responsibilities, and processes established to manage data throughout its lifecycle. It ensures that data are accurate, complete, reliable, up-to-date, secure, interoperable, privacy-preserving, and of sufficient quality for processing and use in Artificial Intelligence and Data Science applications.

ROLES AND RESPONSIBILITIES

Executive Management: Approve this policy. Allocate the necessary resources to ensure its effective implementation. Ensure alignment between this policy and the Company's business strategy.

Artificial Intelligence Committee: Evaluate and approve the implementation of AI projects across the company. Oversee ethical, legal, operational, and social risks associated with the use of Artificial Intelligence. Monitor compliance with and implementation of this policy. Periodically report to Executive Management (or the Board of Directors, where applicable) on the implementation of the AI strategy, relevant risks, significant incidents, key performance indicators, and continuous improvement initiatives.

Digital Transformation Vice Presidency and Information Technology Management: Lead the Company's Artificial Intelligence and Data Science strategy. Ensure compliance with this policy. Promote the secure, responsible, and effective adoption of AI technologies across the organization.

Business Process Owners: Define AI use cases. Validate AI-generated outputs and ensure their appropriate interpretation. Remain accountable for business decisions and outcomes supported by Artificial Intelligence.

Data Scientists: Design, develop, train, validate, and maintain AI models in accordance with ethical, technical, and regulatory standards.

Data Engineers: Prepare, transform, and manage data. Design and maintain data architectures and pipelines supporting AI and Data Science solutions.

Business Users: Use AI systems responsibly and in accordance with this policy. Report anomalies, incidents, or risks identified during the use of AI systems. Comply with all applicable internal requirements governing AI use.



Legal and Compliance Department: Ensure that AI developments comply with applicable laws, regulations, contractual obligations, and internal corporate policies.

Suppliers and Third Parties: Ensure that AI systems, products, or services provided to the Colombina Group comply with the requirements established in this policy. Fulfill all contractual obligations related to the responsible use and governance of Artificial Intelligence.

GUIDING PRINCIPLES

Confidentiality: AI systems shall protect personal, sensitive, and strategic information through security and cybersecurity controls that ensure its confidentiality and prevent unauthorized access, use, disclosure, modification, or destruction, in compliance with the Colombina Group's Information Security and Data Protection Policies.

Integrity: AI systems shall ensure the accuracy, consistency, and reliability of data, models, and results throughout their lifecycle through controls that preserve their proper functioning and risk management procedures that enable the timely identification, assessment, and mitigation of deviations, vulnerabilities, and potential impacts.

Availability: AI systems shall ensure the availability, continuity, and timely access to data, models, and results, ensuring their resilient operation throughout their lifecycle.

Ethics and Accountability: Artificial Intelligence systems shall respect human rights, privacy, and the principles of fairness, preventing discriminatory biases and other undue impacts. Each system shall have a clearly identified owner, who shall be responsible for its development, implementation, operation, and results, as well as for defining and implementing any necessary corrective and improvement actions.

Governance and Oversight: Every AI solution shall undergo technical, legal, and ethical validation prior to its implementation and shall be subject to oversight by the Artificial Intelligence Committee. Critical AI-assisted decisions shall ensure human oversight by informing users of AI involvement and allowing review, intervention, or validation by the responsible process owners whenever applicable.

Privacy and Data Protection: AI systems shall ensure the lawful, secure, and responsible processing of personal data, in compliance with the Colombina Group's Data Protection and Information Security Policies. The use of data to train, fine-tune, or



evaluate AI models shall be supported by the corresponding legal basis or authorizations and by the security measures necessary to protect such data.

Transparency: AI systems shall be transparent and explainable, especially when they influence decisions that affect individuals. They shall also have the necessary documentation to ensure the traceability of their design, development, and results, and shall clearly inform users whenever they interact with AI or with content, recommendations, or decisions generated or assisted by this technology. The Colombina Group shall establish mechanisms that allow potentially affected individuals to request clarification and, where appropriate, the review of decisions or results, ensuring their evaluation by the responsible process owner or the competent authority.

Data and Model Quality: AI systems shall be based on quality data managed in accordance with the Colombina Group's Data Protection Policy. Models shall be designed, validated, and continuously monitored to ensure their accuracy, reliability, traceability, and the timely detection of deviations or performance degradation, implementing the corresponding corrective actions. Likewise, critical AI-assisted decisions shall allow for review and, when necessary, modification or reversal by the process owner or the person responsible for the solution.

Responsible Innovation: The Colombina Group shall promote the responsible use of Artificial Intelligence and Data Science to generate value, foster innovation, and support digital transformation, in alignment with the corporate strategy, ethical principles, and risk management.

Sustainability and Ecological Footprint: The Colombina Group shall promote the responsible and sustainable use of Artificial Intelligence by prioritizing resource-efficient solutions, sustainable technological infrastructure, and suppliers committed to reducing their environmental impact. Likewise, whenever possible, the environmental impact associated with the use of AI systems shall be assessed and monitored, promoting optimization and continuous improvement actions.

LIMITS AND PROHIBITED USES OF ARTIFICIAL INTELLIGENCE

Use Limits: Artificial Intelligence shall be used as a tool to support decision-making and shall not replace human judgment in decisions with a significant impact on individuals or the business. Every AI system shall have a defined purpose, documented use limits, and human oversight mechanisms for critical decisions. Access to sensitive



AI functionalities or capabilities shall be restricted to authorized personnel, subject to prior approval by the Artificial Intelligence Committee and in compliance with applicable regulations and corporate policies.

Prohibited Uses: The development, acquisition, contracting, or implementation of AI systems that infringe fundamental rights, generate manipulation, exploit vulnerabilities, cause discrimination, perform social scoring, or enable unauthorized biometric surveillance is prohibited. Any exception shall be subject to prior evaluation and approval by the Artificial Intelligence (AI) Committee.

TRAINING ON THE USE AND APPLICATION OF ARTIFICIAL INTELLIGENCE

Training: Training and awareness programs shall be developed for employees involved in the design, development, implementation, or use of AI systems in order to strengthen their knowledge of the ethical, responsible, and secure use of these technologies, as well as the guidelines established in this Policy. Such training shall be updated periodically as technology, associated risks, and the applicable regulatory framework evolve.

POLICY REVIEW

This Policy shall enter into force upon its approval by Executive Management and shall be reviewed annually by the Artificial Intelligence (AI) Committee. It shall also be updated in accordance with national and international regulatory, technological, and strategic changes to ensure its alignment with the strategic needs of the Colombina Group.