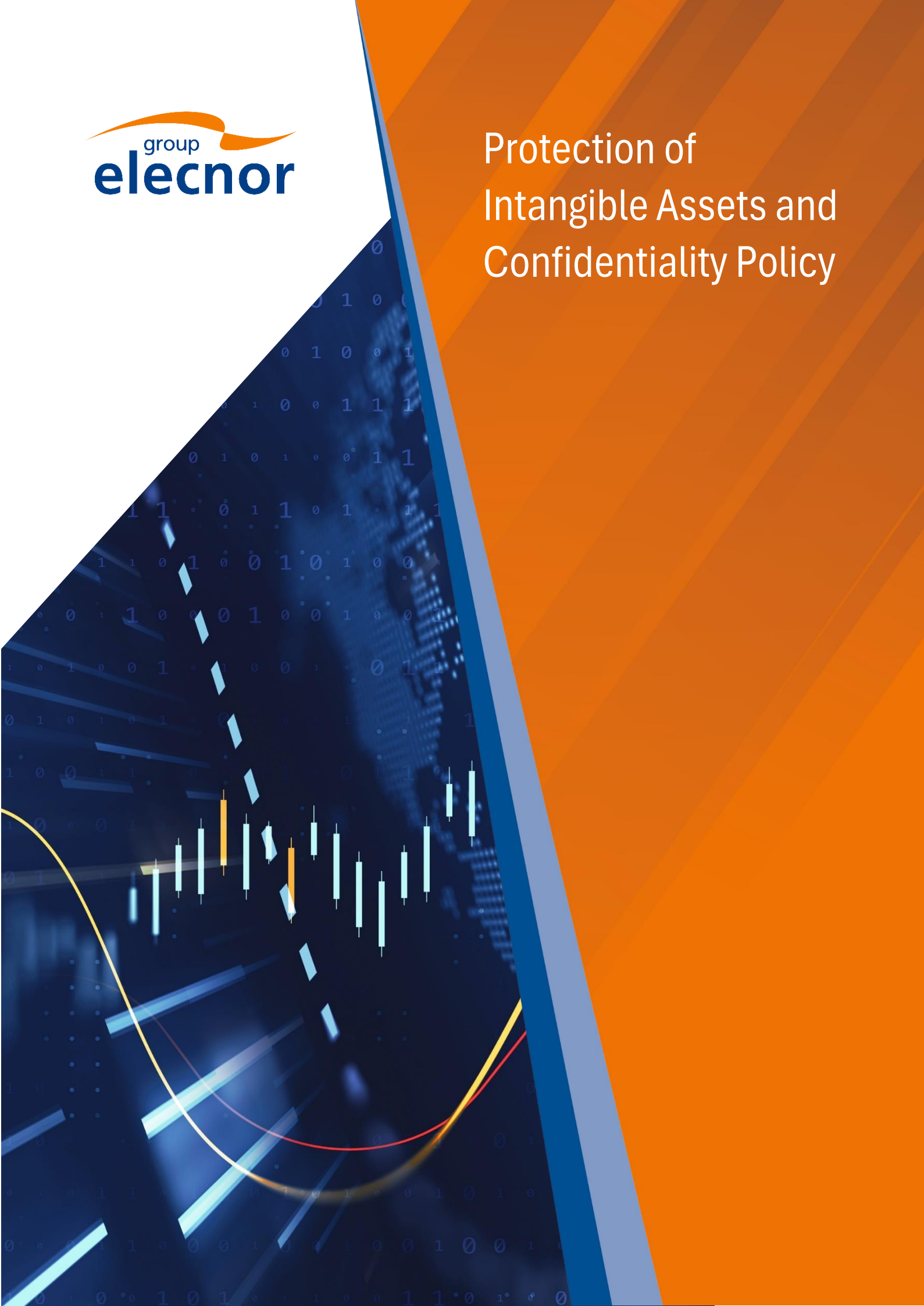


# Protection of Intangible Assets and Confidentiality Policy



## INDEX

1. INTRODUCTION	3
2. DEFINITIONS	3
3. OBJECT	4
4. SCOPE OF APPLICATION	4
5. GENERAL BUSINESS PRINCIPLES	4
5.1. Security	5
5.2. Confidentiality	5
6. PROTECTION OF INNOVATION, RESEARCH AND ITS DEVELOPMENTS	5
7. PROTECTION MEASURES	6
8. GOVERNANCE, INTERPRETATION, REVIEW AND UPDATING	6
8.1. Governance and interpretation	6
8.2. Review and updating	6
9. DISSEMINATION	6
10. ENTRY INTO FORCE	7

## 1. INTRODUCTION

As a listed company, the Board of Directors of Elecnor, S.A. (“**Elecnor Holding**” or the “**Company**”) is legally vested with the non-delegable power to determine the general policies and strategies of the Company and of the Group of which it is the controlling entity (“**Elecnor Group**” or “**Group**”), a power also set forth in the Corporate Governance Policy and in the Regulations of the Board of Directors.

Intangible Assets represent a strategic value for the Elecnor Group, providing an essential competitive factor to the Group. These assets comprise a wide range of elements, such as intellectual and industrial property rights (trademarks, patents, copyrights), trade secrets, know-how, as well as organisational models and internal development technologies, all of which are fundamental to maintaining the Group’s competitive position in terms of innovation and efficiency.

Pursuant to the foregoing, the Board of Directors of the Company approved this **Protection of Intangible Assets and Confidentiality Policy**, (the “**Policy**”) which applies to the Group and which forms part of the Company’s Corporate Governance System.

## 2. DEFINITIONS

For the purposes of this Policy, the following definitions shall be taken into consideration:

- **Intangible Assets:** those non-physical assets that have an economic value derived from their protection by intellectual property (IP) rights. This includes, but is not limited to, copyrights, trademarks, patents, databases, domain names, trade secrets, and any other rights that grant exclusivity over the creation, use, or exploitation of ideas, innovations, and distinctive signs. These assets are fundamental to the business, as they represent the intellectual and creative value of the Elecnor Group, and their protection is governed by the legal provisions on intellectual and industrial property, Trade Secrets and other applicable legislation.
- **Databases:** Collections of works, structured sets of data or other independent elements arranged in a systematic or methodical manner and individually accessible by electronic means or otherwise, protected by the originality of their structure, to which Royal Legislative Decree 1/1996, of 12 April, approving the revised text of the Intellectual Property Law, regularising, clarifying and harmonising the legal provisions in force on the subject (the “Intellectual Property Law”), from which a sui generis right is derived that protects the investment in their creation and maintenance.
- **Copyright:** The term “copyright” and related rights is used to describe the rights of authors over their works, “works” being considered to be all original creations not only literary or artistic but also of scientific value expressed by any means or medium, tangible or intangible, now known or to be invented in the future.
- **Know-how:** know-how is understood to be technical knowledge, skills and experience applied to key company processes, protected by confidentiality agreements due to their strategic relevance.
- **Trademarks:** distinctive signs that identify Elecnor Group products or services and imply exclusive rights over the use and exploitation of these signs in the market. They must be recorded in the Trademark Register in such a way as to enable the competent authorities and the general public to determine the clear and precise purpose of the protection granted to their owner.
- **Domain names:** unique identifiers on the Internet that represent the digital presence of the Elecnor Group. The main purpose of Internet domain names and the domain name system (DNS) is to translate the IP addresses of each network asset into memorable and easy-to-find terms.

- **Patents:** protection on new and industrially applicable inventions, with a duration of twenty years, giving the holder the right to prevent unauthorised use.
- **Trade Secrets:** confidential information with commercial value, such as algorithms, know-how, organisational models and strategies, the protection of which depends on appropriate security measures to maintain its secrecy. Algorithms are calculation and analysis processes used in technological solutions and internal processes, which are protected as Trade Secrets due to their strategic nature and value to the company.
- **Software:** programming codes and their versions, technical documentation and user manuals created or acquired by the Elecnor Group, subject to copyright and other applicable protection rights. The protection granted by the Intellectual Property Law extends to: (i) to the computer program itself (code) provided that it is the author's own intellectual creation, (ii) to the preparatory documentation, (ii) to the technical documentation, (iv) to the user manuals, (v) to any form of expression of a computer program, and (vi) to any successive versions of the program as well as to the derived programs, except those created for the purpose of causing harmful effects to a computer system.

Unless expressly provided otherwise in any section of this Policy, definitions in the singular include the plural and vice versa.

### 3. OBJECT

The purpose of this Policy is to establish the applicable principles and rules to ensure that the Elecnor Group's Intangible Assets, such as intellectual and industrial property rights, Trade Secrets, know-how, as well as organisational models and internal development technologies, are effectively preserved, managed and protected against unauthorised use, maximising their long-term value and guaranteeing their exclusive exploitation, and also promoting responsible use in line with applicable laws and regulations, as well as with the Group's values and principles.

### 4. SCOPE OF APPLICATION

This Policy is applicable to all companies that make up the Elecnor Group and, therefore, to their directors, managers and employees of all kinds, as well as, where applicable, to external collaborators, who have access to or participate in the development, use or management of the Elecnor Group's Intangible Assets.

For those investee companies in which this Policy does not apply, the Company shall promote as far as possible, through its representatives on their management bodies, the alignment of their own policies with those of the Company, within the framework of respect for the decision-making autonomy of the investee companies.

In addition, this Policy shall also be applicable, as applicable, to temporary joint ventures (UTES), joint ventures, and other equivalent associations, whether domestic or foreign, when any of the companies that make up the Elecnor Group have control over their management and always within the legally established limits.

### 5. GENERAL BUSINESS PRINCIPLES

The management and protection of the Elecnor Group's various Intangible Assets is carried out in accordance with their characteristics and strategic value for the Elecnor Group, in accordance with the applicable regulations, and under the following general principles of action.

### 5.1. Security

Elecnor Holding shall promote the implementation in the Group of the security measures that may be appropriate in each case, such as the following:

- **Physical measures:** Access control to facilities where sensitive information is stored, surveillance systems and use of authentication devices.
- **Technical and digital measures:** Encryption tools, multi-factor authentication systems and access control to databases.
- **Organisational measures:** Limiting authorised personnel access and signing confidentiality agreements that establish penalties for improper disclosure.

### 5.2. Confidentiality

Elecnor Holding shall promote the adoption of confidentiality measures to protect Intangible Assets relating to information and innovation, and in this regard shall promote, among others, the following actions:

- In all **relations with third parties** involving the exchange of sensitive information, Trade Secrets or strategic knowledge, Elecnor Holding shall ensure that **confidentiality agreements** are signed to ensure the protection of said information and innovation.
- In turn, **confidentiality agreements** shall also apply when necessary **within the organisation** with respect to professionals who have access to or participate in the creation, development or implementation of strategic assets and innovative projects, thus reinforcing the commitment to preserve the Elecnor Group's sensitive information. This is especially advisable in the initial phases of an innovation project or process, as it allows the confidentiality and novelty necessary to protect developments in the future through other industrial property rights, such as patents or industrial designs, to be maintained.
- **Regular audits** are also carried out to supervise compliance with these confidentiality commitments, and in the event of non-compliance, penalties are provided for on a case-by-case basis.

These confidentiality practices seek to mitigate the risks associated with the handling of strategic information and ensure that the value and control of Intangible Assets remain under the control of the Elecnor Group.

## 6. PROTECTION OF INNOVATION, RESEARCH AND ITS DEVELOPMENTS

- In order to promote Innovation and the Development of new products, services and processes that improve the Group's competitiveness and efficiency, Elecnor Holding shall promote appropriate measures to **preserve the ownership and other rights of the Elecnor Group** with respect to all inventions, discoveries, improvements, creative works or any other development carried out within the framework of its functions, or using Elecnor Group resources and means, by the Group's personnel, as well as its partners and suppliers.
- To this end, the sensitive R&D and legal departments or areas shall ensure that **all knowledge and development** generated within the Elecnor Group **is maintained as a strategic asset** and strengthens its competitive position.

## 7. PROTECTION MEASURES

The Elecnor Group applies a **comprehensive system to protect its Intangible Assets**, ensuring that they remain safeguarded and accessible only for authorised purposes.

To this end, Elecnor Holding promotes a system that includes protection measures covering legal, organisational and physical and digital security aspects, establishing a robust defence against threats of loss, misuse or unauthorised appropriation, thus enabling the Elecnor Group to maintain control and value of its Intangible Assets.

## 8. GOVERNANCE, INTERPRETATION, REVIEW AND UPDATING

### 8.1. Governance and interpretation

In terms of governance, the provisions of the Information Security and Cybersecurity Policy shall apply.

The contact body for any queries or questions regarding the interpretation and execution of this Policy shall be the Information Security and Artificial Intelligence Committee, which may be contacted through the channels provided for this purpose.

### 8.2. Review and updating

This Policy shall be reviewed and updated periodically to adapt to technological advances and regulatory, organisational, technical and process changes in the Elecnor Group, as well as to ensure that it is consistent and fit for its purpose.

The modification and updating of this Policy shall be approved by the Board of Directors of Elecnor Holding, following a report from the Appointments, Remunerations and Sustainability Committee, and shall be disseminated to employees and partners through the usual channels.

## 9. DISSEMINATION

This Policy and any amendments thereto shall be published on the Company's corporate website and shall be kept permanently updated, with the consequent knowledge and assumption of its full content by Elecnor Group employees and other parties bound by this Policy. In addition, the Elecnor Group may require all employees and partners to sign a document, as an appendix to their employment contract, in which they guarantee that they have read and understood this Policy, undertaking to implement it in their day-to-day work.

Notwithstanding the foregoing, Elecnor Holding shall carry out communication, training and awareness-raising actions for the understanding and implementation of this Policy, as well as its updates.

In any case, Professionals and Users are recommended to periodically access the content of this Policy through the available channels for a better understanding of the same, and it should be taken into account that their ignorance of all or part of its content does not exempt them from compliance.

## 10. ENTRY INTO FORCE

This Policy was approved by the Board of Directors of Elecnor Holding at its meeting held on 27 November 2024, coming into force on 1 January 2025.