

## **ITALGAS GROUP POLICY FOR THE RESPONSIBLE USE OF ARTIFICIAL INTELLIGENCE-BASED TOOLS**

Through this Policy, applicable to all Group companies, Italgas recognises the importance of artificial intelligence-based tools as a key driver of digital transformation, essential for enhancing efficiency and innovation in managed processes, quality of service, and sustainability, as well as improving the quality of work by providing advanced support tools.

Italgas is committed to ensuring that their use takes place in full respect of the rights of individuals and the community, with human beings at the centre, in complete transparency and in compliance with applicable national and international laws, regulations, and standards.

To pursue this commitment, all Group companies are called upon to ensure the dissemination and observance of this Policy within their own organisations.

This Policy is guided by the following principles:

- The development and use of artificial intelligence systems must take place in full respect of the rights of individuals and the community, as well as applicable regulations on privacy, security by design, cybersecurity, information confidentiality, and other applicable national and international rules.
- A balance must be maintained between the creation of efficiency and innovation and the need to protect people, including workers, from discrimination, bias, and invasive surveillance.
- The Group is committed to ensuring the cybersecurity of artificial intelligence systems, identifying and mitigating vulnerabilities to safeguard their integrity throughout their entire life cycle.
- The entire life cycle of artificial intelligence systems must be conducted in accordance with GDPR principles: the protection of personal data must be embedded from the design phase, ensuring data minimisation, pseudonymisation and anonymisation where possible; the right not to be subject to decisions based solely on automated processing without human intervention must be guaranteed.
- The use of artificial intelligence systems must be consistent with the information security principles adopted by the Group, based on the protection of confidentiality, integrity, and availability of data, ensuring that information is accessible exclusively to authorised persons in order to safeguard the company's information assets.
- Italgas Group adopts a risk-based approach, ensuring that the development and use of artificial intelligence systems is preceded and accompanied by a risk analysis proportionate to the complexity and impact of the systems. User verification of outputs must always be ensured, as artificial intelligence systems may reflect biases present in training data, thereby producing discriminatory or unfair content.
- Human centrality: a constant human oversight is required, whereby individuals with specific training and critical thinking skills supervise the outputs of artificial intelligence systems. In addition, research and testing activities are conducted to reduce potential biases in the outputs of artificial intelligence systems.
- Transparency: the use of artificial intelligence systems must be conducted in a transparent manner; users must be informed when they interact with artificial intelligence systems, and content generated by such systems must

be identifiable as such. Those using the systems must be aware of the algorithm's operating rules, the associated risks, and the safeguards to be observed.

- Accountability: Italgas defines clear roles and responsibilities for the governance of artificial intelligence systems.
- The use and placing on the market of so-called unacceptable-risk artificial intelligence systems is prohibited.
- Italgas favours energy-efficient artificial intelligence solutions and data centres with a low ecological footprint and data localisation within the EU.
- Improper use of artificial intelligence systems, or use in violation of applicable rules concerning individual rights, data and information security, and the protection of the integrity of business processes, is not permitted.

### **Dissemination and Update**

Italgas undertakes to assess annually the need for any updates to this Policy following significant changes related to the Group's strategy.

This Policy is brought to the attention of Italgas Group's people and all Stakeholders in a spirit of transparency and collaboration, and is publicly available to anyone who requests it through the Group's internal and external communication channels.

Milan, June 4, 2026

**Chief Executive Officer**  
**Paolo Gallo**