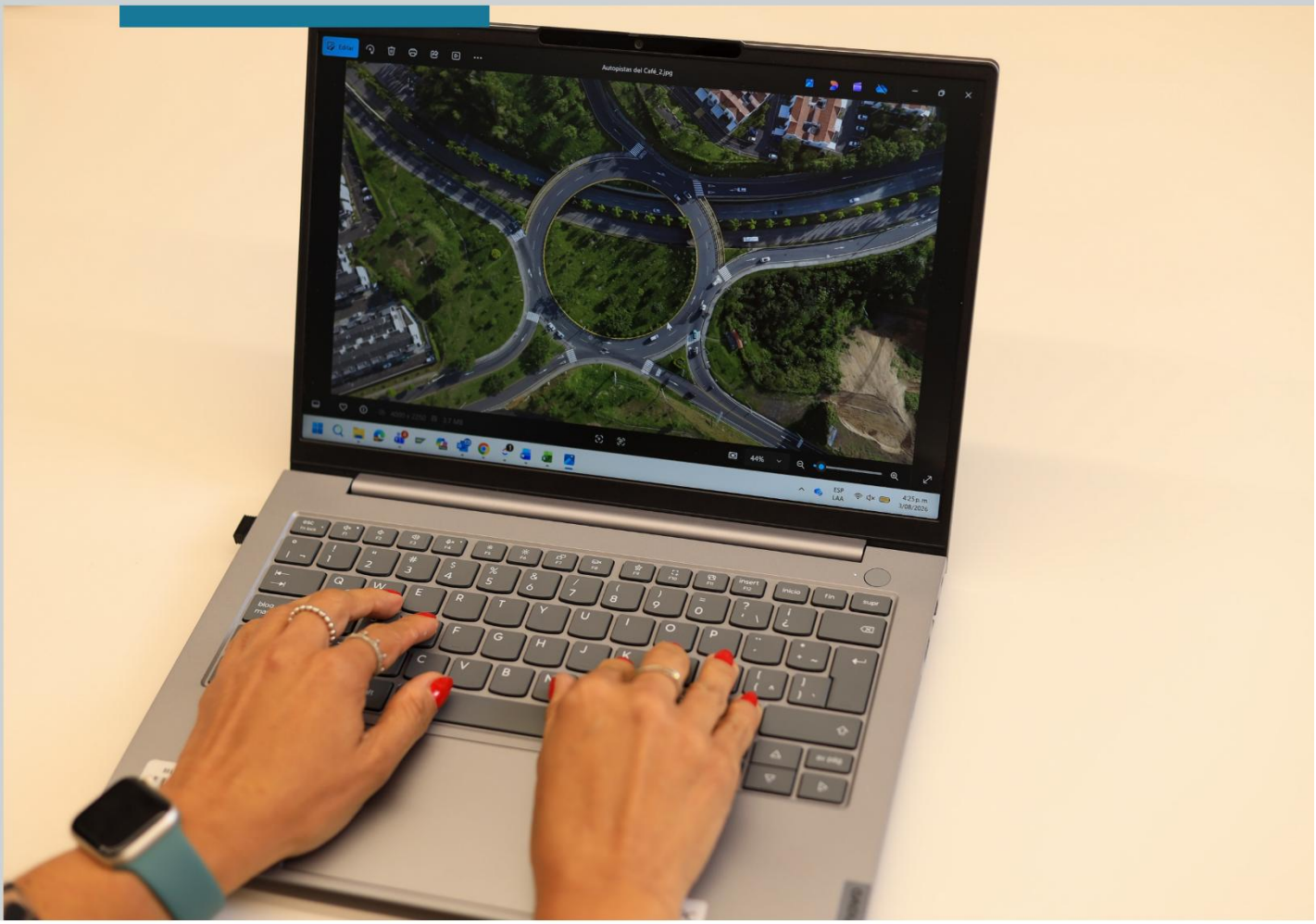

ARTIFICIAL INTELLIGENCE POLICY

ODINSA | Empresa de concesiones del GRUPO ARGOS

CHAPTER I. INTRODUCTION

Odinsa recognizes the transformative potential of Artificial Intelligence (AI) to drive efficiency, innovation, and growth in its operations. At the same time, the company understands the importance of using this technology in an ethical and responsible manner, ensuring that its implementation respects the fundamental values and principles of Odinsa, as well as the confidentiality of the information the company handles.

CHAPTER II. OBJECTIVE

Establish frameworks and guidelines for the ethical, responsible, and secure development, implementation, and use of Artificial Intelligence (AI) across Odinsa. This policy will guide the behavior of collaborators and third parties in relation to AI systems, ensuring compliance with laws and regulations, transparency, risk and bias mitigation, the protection of personal and confidential information of the company, and respect for fundamental human rights. This policy will further provide clear guidelines for the adoption of technical and organizational measures to ensure the cybersecurity and integrity of AI-driven processes, together with the responsibilities of each collaborator in their appropriate use, promoting an environment in which AI is used in a safe, transparent, and socially positive manner.

CHAPTER III. SCOPE

This artificial intelligence policy applies to all geographies in which Odinsa, its linked companies, contractors, and third parties operate. Its compliance is mandatory for all collaborators and any persons or entities with whom they interact, and includes the development of new AI systems or applications, the implementation of existing AI systems, the updating or modification of AI systems in use, and any other process involving the use, application, integration, or supervision of AI technologies.

This policy is aligned with, and complements, the Artificial Intelligence Policy of Grupo Argos S.A. (v2026), which establishes the corporate framework for the responsible use of AI across the business group. Where the specific provisions of this Odinsa policy are more detailed or more restrictive — reflecting the particular context of infrastructure concessions and their regulatory environment — the provisions of Odinsa shall apply to the operations of Odinsa.

CHAPTER IV. GUIDING PRINCIPLES

- Transparency and Explainability: All AI systems used within the company must be transparent in their operation and decisions. Collaborators must be able to explain how the results and decisions derived from the use of AI are obtained.
- Fairness and Impartiality: AI must be used in a manner that does not perpetuate biases, discrimination, or inequities. All systems must be periodically evaluated to ensure they operate in a fair and equitable manner.
- Privacy and Security: Personal and sensitive information used by AI systems must be handled with the highest level of confidentiality and protection. Data must be collected, stored, and processed in accordance with applicable data protection laws.
- Accountability and Oversight: Each collaborator is responsible for ensuring the correct and ethical use of AI in their daily functions. Periodic oversight of AI systems is required to prevent misuse or unintended consequences.
- Social and Environmental Impact: The social and environmental impact of any AI application must be considered prior to its implementation, ensuring that its effects are positive and aligned with the values of Odinsa.

CHAPTER V. POLICY

Odinsa, its linked companies, contractors, and third parties, in compliance with applicable laws and regulations, undertake to use Artificial Intelligence in a responsible and ethical manner, seeking to obtain operational and business benefits, while protecting the rights and safety of its collaborators, clients, and other stakeholders.

By implementing AI governance and risk management practices, Odinsa will identify, assess, and mitigate potential adverse impacts in areas such as privacy, equity, transparency, and accountability. The company will further ensure that the development and use of AI systems is aligned with the ethical and human rights principles established within its corporate governance framework.

With respect to the use of Artificial Intelligence, Odinsa, its linked companies, and third parties undertake to:

- Adopt the guidelines that accompany this policy in order to promote the trustworthy and beneficial use of AI, providing training and resources to its collaborators.
- Conduct impact assessments of AI systems in order to identify and mitigate potential cybersecurity risks. In those cases in which a tool represents a risk that could expose the company, its use shall be prohibited.
- Collaborators and third parties shall use AI in accordance with the ethical principles established herein.
- Each collaborator is responsible for validating and appropriately using the data and critical business information generated or processed through AI tools, in order to mitigate harm and biases in the data and to prevent adverse effects on people, processes, or the information of the organization.
- All collaborators, process leaders, technical areas, legal areas, and any unit that promotes, adopts, or manages AI tools within the organization must follow the guidelines established in the Cybersecurity Policies and in this policy. Accordingly, the use of AI is authorized exclusively for solutions that have completed the technical accompaniment of the Technology team in their development and/or implementation.
- Incorporate the governance framework established for the development, implementation, acquisition, and use of AI systems, which shall consider best practices in the field and be periodically updated in accordance with the evolution of technologies, related risks, and applicable regulations.
- Collaborate with relevant authorities and stakeholders in order to advance the establishment of best practices and regulatory frameworks concerning Artificial Intelligence.

- Ensure that solutions incorporating AI, from the initial stages through to production deployment (whether developed or acquired), comply with the Personal Data Protection Policy, respecting the right to privacy of individuals, including strict measures to prevent information leakage in applications and to ensure that sensitive and confidential data are not exposed or improperly used.
- Odinsa promotes the exploration of AI solutions that generate value. To this end, secure testing environments (Sandboxes) are made available in which collaborators may experiment with synthetic or anonymized data without operational risk, subject to prior coordination with the Technology team.
- Establish institutional accountability for AI systems deployed in production: each AI system shall have an identified business owner (accountable for outcomes and use cases) and a technical owner (accountable for performance, drift, and maintenance). Accountability shall not rest solely on individual users but on the organizational entity that authorizes and deploys the system.

CHAPTER VI. HUMAN OVERSIGHT IN CRITICAL DECISIONS

Artificial intelligence is a tool to support human work. It does not replace professional judgment or the formal decision-making processes of the organization. Specifically:

- All AI-generated content, analyses, or recommendations that inform significant business, financial, legal, or operational decisions must be reviewed and validated by a qualified human being before being adopted as a final output.
- In high-risk AI applications — including road incident management, airport security decisions, critical infrastructure maintenance prioritization, emergency resource allocation, hiring, performance evaluation, and legal compliance — human intervention must be formally embedded in the process. No automated decision in these domains may be executed without human review and explicit approval, given the potential impact on public safety and infrastructure availability.
- Collaborators retain the right to escalate any AI-generated output that they consider to be inaccurate, biased, or inconsistent with the values of the organization, using the reporting channels established by the organization.
- The deployment of AI as an autonomous agent capable of executing consequential actions without human approval shall be subject to explicit authorization by the multidisciplinary approval body defined in the AI governance chapter of this policy, with documented safeguards in place. This shall apply with particular rigor to any AI system operating in contexts of public safety or critical infrastructure.

CHAPTER VII. PROHIBITED USES OF AI

Beyond the ethical and security guidelines established in this policy and its annexes, Odinsa expressly prohibits the use or deployment of AI systems that:

- Generate discriminatory, biased, offensive, or reputationally harmful content against individuals, communities, or the organization.
- Simulate communications as if originating from another person (identity impersonation), including deepfakes and other forms of digital misrepresentation.
- Bypass internal controls, audit trails, or compliance mechanisms of the organization.
- Process classified sensitive business information through unauthorized or non-enterprise AI tools.
- Employ subliminal techniques, manipulative strategies, or the exploitation of cognitive vulnerabilities to influence individuals' behavior in ways that could cause them harm, in alignment with the prohibited categories defined in the European Union Artificial Intelligence Act (Regulation 2024/1689).
- Classify or score individuals based on their social behavior or personal characteristics in ways that result in detrimental or unjustified treatment (social scoring systems).
- Perform surveillance or monitoring of road users, airport passengers, or collaborators without explicit legal basis, regulatory authorization, and appropriate disclosure — recognizing that Odinsa operates infrastructure with public access.

CHAPTER VIII. ENVIRONMENTAL RESPONSIBILITY AND ECOLOGICAL FOOTPRINT

Odinsa recognizes that the operation of AI systems requires significant computational resources with associated environmental impacts. The organization undertakes to:

- Prioritize AI infrastructure hosted on cloud platforms with verified public commitments on environmental sustainability. The organization operates its AI workloads primarily on Microsoft Azure, whose parent company has publicly committed to becoming carbon negative by 2030 and maintains an Environmental Management System certified under ISO 14001 for its key facilities.
- Incorporate environmental efficiency as a criterion in the evaluation and selection of AI platforms, models, and third-party AI service providers.
- Track and report, to the extent feasible, the energy consumption and associated carbon footprint of material AI workloads, using data made available by cloud infrastructure providers such as the Microsoft Azure Emissions Impact Dashboard.
- Leverage AI as a tool to reduce the environmental footprint of concession operations — including traffic flow optimization to reduce vehicle emissions, energy management systems in airport facilities, and infrastructure lifecycle optimization to reduce material use and waste.

CHAPTER IX. AI GOVERNANCE

Odinsa and its linked companies define the following organizational structure with instances, roles, and responsibilities to ensure proper compliance with the Artificial Intelligence Policy.

1. Technology Team

- Review, approve, and monitor the use of AI.
- Define the responsibilities and roles of the different teams involved in the development, implementation, acquisition, and use of AI systems.
- Define a periodic review and update process for this policy, considering regulatory, technological, and best-practice changes in the field of AI.
- Implement technical measures to protect the integrity and security of data used by AI systems.
- The team shall meet as required whenever a request to evaluate a new AI tool is received.

2. Technology Team and Odinsa Cross-Functional Areas

- Establish how and when models may be applied and who has the authority to approve their use.
- Depending on the scope of the tool incorporating the AI element, convene the business areas that may be impacted, as well as the process and change management cross-functional areas to ensure the integrity of the business process.
- The approval of high-impact models shall be collegial, carried out by a multidisciplinary team (Technology, Legal, Risk, Human Management, and the impacted business area). Technology validates security, and the multidisciplinary team validates the use case and its ethical impact, ensuring that efficiency does not compromise corporate values or legality.

3. Users

- Any collaborator, supplier, contractor, or other authorized third party who uses the information of Odinsa and its linked companies in the execution of their daily work activities and who must adhere to what is stipulated in this policy.

4. Collaborators

- Use AI in accordance with the established ethical principles.
- Report any incident, misuse, or ethical issue related to AI to their immediate supervisor.
- Participate in training and remain informed about best practices for the ethical use of AI.

- It is strictly prohibited to enter, upload, or share in AI systems (internal or external, free or commercial) confidential, strategic, or sensitive information, or personal data of collaborators, clients, suppliers, or of the company itself.
- Collaborators must ensure that any information used in AI applications has been previously anonymized or authorized by the area that owns the information.
- The confidentiality obligations existing between the collaborators and the company shall apply to the use of AI. Failure to comply with confidentiality clauses through the use of AI shall be considered a serious offense, subject to disciplinary sanction and possible legal action.
- Collaborators in supervisory positions must oversee the use of AI within their teams and ensure adherence to this policy, as well as facilitate continuous training on the ethical use of AI and periodically review and update procedures to adapt them to new regulations.

5. Contractors

- Contracts with suppliers must include AI use responsibility clauses to ensure that AI use is performed in accordance with the ethical principles established at Odinsa.

6. Human Talent

- Build periodic training plans and reinforce the socialization of policies and procedures for the appropriate use of AI.
- Detail the measures to be taken in case of non-compliance with the guidelines established in this policy.
- Establish the consequences and disciplinary sanctions applicable to serious violations.
- Foster a culture of accountability around AI.

CHAPTER X. REFERENCES

- European Union Artificial Intelligence Act — Regulation 2024/1689
- Draft AI Bill of Rights — United States
- Cybersecurity Policy — Odinsa
- Personal Data Protection Policy — applicable in the countries where Odinsa operates
- National Policy for Digital Transformation and Artificial Intelligence (CONPES 3975) — Colombia
- External Circular 02 of 2024 — Superintendency of Industry and Commerce, Colombia
- Code of Conduct — Odinsa S.A.
- Artificial Intelligence Policy — Grupo Argos v2026 (corporate framework)

- NIST AI Risk Management Framework (referenced in Annex A2 as an applicable framework for AI risk management)
- ISO/IEC 42001 — AI Management Systems (referenced in Annex A2 as an applicable standard; Odinsa's technical guidelines are aligned with this framework)
- Concession agreements between Odinsa and granting authorities (Agencia Nacional de Infraestructura in Colombia and equivalents in other jurisdictions) — sector-specific requirements applicable to AI deployments
- Civil aviation regulatory framework applicable to airport operations — Aeronáutica Civil (Colombia), ICAO, and IATA guidelines

CHAPTER XI. ANNEXES

- OD-TI-004 (A1) — Guidelines for the Responsible and Secure Use of Artificial Intelligence
- OD-TI-004 (A2) — Guidelines for the Secure Development and Implementation of Artificial Intelligence

CHAPTER XII. VERSION AND APPROVAL

Approval instance: Executive Management — Vice Presidency of Human Management and Administration.

Review frequency: Annually or whenever required.

Version 1 (September 1, 2025) — Approved by Carlos Mario Alzate, VP Human Management and Administration. Initial version. Document developed using SUMMA's AI Use Policy as a reference.

Version 2 (June 2026) — Approved by Executive Management. Update aligned with the S&P Global CSA 2026 assessment criteria. Chapters VI (Human Oversight in Critical Decisions), VII (Prohibited Uses of AI), and VIII (Environmental Responsibility) were incorporated. The institutional accountability framework was strengthened. Explicit references to ISO/IEC 42001, the NIST AI Risk Management Framework, the EU AI Act, and the concession and civil aviation regulatory frameworks applicable to Odinsa's operations were added.