



TECNICAS REUNIDAS

**INTANGIBLE ASSET PROTECTION AND CONFIDENTIALITY
POLICY**

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1. INTRODUCTION

The Board of Directors of Técnicas Reunidas, S.A. ("**Técnicas Reunidas**" or the "**Company**"), as a listed company, is legally attributed the non-delegable power to determine the general policies and strategies of the Company and of the Group of which it is the parent company ("**TR Group**" or "**Group**"), a power that is also included in the Board of Directors Regulations.

Intangible assets represent a strategic value for Técnicas Reunidas, providing an essential competitive factor that drives its leadership in innovation and efficiency. Their proper management and protection are essential to maintain and strengthen the TR Group's competitive position in the global market. Within this framework, the TR Group is committed to guaranteeing an ethical, transparent and secure use of intangible assets, aligning its management with the applicable regulations in force and the highest standards of protection,

In accordance with the foregoing, the Board of Directors of Técnicas Reunidas has approved this *Intangible Asset Protection and Confidentiality Policy* (the "**Policy**"), which applies to the TR Group and is integrated into the Company's 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 rights (IP). 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 for the business, since they represent the intellectual and creative value of the TR Group, and their protection is governed by the legal provisions of intellectual and industrial property, Business Secrets and other applicable laws.
- **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 its structure, to which the Royal Legislative Decree 1/1996, of April 12, approving the revised text of the Intellectual Property Law, regularizing, clarifying and harmonizing the legal provisions in force on the subject (the "Intellectual Property Law") from which derives a sui generis right that protects the investment in its creation and maintenance.
- **Proprietary Technology Development Committee:** committee responsible for supervising and regulating the appropriate measures to preserve the ownership and other rights of the TR Group with respect to all inventions,

discoveries, improvements, creative works or any other development carried out within the framework of its functions, or using TR Group resources and means, by TR Group personnel, as well as its collaborators and suppliers.

- **Copyright:** the term "copyright" and related terms is used to describe the rights of authors over their works, being considered "works" all original creations not only literary or artistic but also of scientific value expressed by any means or support, tangible or intangible, currently known or to be invented in the future.
- **Director of Proprietary Technology Development:** member of the Proprietary Technology Development Committee, in his capacity as Director of Proprietary Technology Development, he is responsible for the protection of Intangible Assets and the confidentiality related to them.
- **Know-how:** know-how is understood as technical knowledge, skills and experience applied in key processes of the company, protected by confidentiality agreements due to its strategic relevance.
- **Trademarks:** distinctive signs that identify products or services of the TR Group and imply exclusive rights over the use and exploitation of such 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 object of the protection granted to its owner.
- **Domain Names:** unique identifiers on the Internet that represent the digital presence of Grupo TR. The main purpose of Internet domain names and the Domain Name System (DNS) is to translate the IP addresses of every asset on the network into memorable and easy-to-find terms.
- **Patents:** protection on new and industrially applicable inventions, with a term of twenty years, which grants the holder the right to prevent unauthorized use.
- **Business Secrets:** confidential information with commercial value, such as algorithms, know-how, organizational models and strategies, whose protection depends on adequate security measures to maintain its confidential nature. Algorithms are calculation and analysis processes used in technological solutions and internal processes, protected as Business 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 TR Group, subject to copyright and other applicable protection rights. The protection granted by the Intellectual Property Law extends to: (i) the computer program itself (code) provided it is an intellectual creation of its author, (ii) preparatory documentation, (iii) technical documentation, (iv) user manuals, (v) any form of expression of a computer program, and (vi) any successive versions of the

program as well as derivative programs, except those created with the purpose of causing harmful effects to a computer system.

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

3. PURPOSE AND SCOPE

The purpose of the Policy is to establish guidelines to ensure the proper identification, protection and responsible and ethical management of the TR Group's Intangible Assets, especially intellectual and industrial property rights, to avoid risks of misuse, unauthorized disclosure or infringement of rights, all in accordance with the corporate values of the TR Group and applicable regulations.

This Policy is applicable to all divisions and functional areas, as well as to suppliers, partners and collaborators of the Company and the TR Group that access or use Intangible Assets.

In those investee companies in which this Policy is not applicable, Técnicas Reunidas will promote as far as possible, through its representatives on its administrative bodies, the alignment of its own policies with those of Técnicas Reunidas, within the framework in all cases of respect for the decision-making autonomy of the investee companies.

Likewise, this Policy shall also be applicable, as appropriate, to temporal consortia, to *joint ventures* and other equivalent associations, whether domestic or foreign, when any of the companies that make up the TR Group have control of their management and always within the legally established limits.

4. ROLE OF THE TR GROUP

Under this Policy, the TR Group plays different roles in relation to the management and protection of Intangible Assets, depending on the activities it performs and the use it makes of such Assets. In order to efficiently incorporate the most advanced technologies and the latest scientific advances, the TR Group focuses on patents, publications and relevant technological trends, as well as on carrying out technological feasibility studies (VT) that allow the capture, storage and analysis of key information for its R&D&I projects.

In this sense, and according to the activities of the TR Group, the following constitute the Role of the TR Group:

1. **Intangible Assets User:** The TR Group will be considered as such when, in the course of its normal business, it uses Intangible Assets, whether its own or those of third parties, for the provision of its services or the achievement of its business objectives or the optimization of its internal organization. This includes, among others, the use of technological tools, methodologies,

operational processes and know-how that contribute to the efficient functioning of its operations. In addition, the TR Group remains at the forefront of technology by constantly monitoring patents and scientific advances relevant to its sector, the results of which are themselves confidential information, and are therefore protected in accordance with the TR Group's security policies and are only disclosed under the terms and conditions strictly necessary for their exploitation and development.

- 2. Responsible for the provision:** TR Group companies will assume this role when they make Intangible Assets developed by third parties available to their clients or users, in the context of their service offerings. In such cases, the TR Group shall ensure that such provision is made in compliance with the terms of use, the relevant licenses and the applicable legal obligations.
- 3. Supplier or developer of Intangible Assets:** The TR Group will be considered a supplier or developer of Intangible Assets in the following cases:
 - (i)** When it introduces Intangible Assets in the market under its name or trademark.
 - (ii)** If it makes substantial authorized modifications on Intangible Assets of third parties.
 - (iii)** In case of developing and commercializing its own Intangible Assets, including technologies, methodologies or organizational models.

The TR Group is committed to ensuring that any of these roles are performed in a manner aligned with its corporate values, ethical requirements and applicable legal provisions, thus contributing to the protection and sustainable valorization of Intangible Assets.

5. GENERAL PRINCIPLES OF ACTION

The TR Group establishes a series of general principles for the management, protection and appropriate use of its Intangible Assets, in order to preserve their strategic value, guarantee their exclusive use and comply with the applicable regulations, which are detailed below:

5.1 SECURITY

Técnicas Reunidas will implement a series of measures in different areas to guarantee the security of confidential information and Intangible Assets within the organization, in order to protect their integrity, availability and confidentiality. These measures fall into three key areas:

- **Physical Measurements:** Facilities where sensitive information is stored will be under strict access controls, including surveillance systems and authentication devices. Access to these facilities will be limited to authorized personnel who have received the necessary training to handle confidential information in a secure manner.

- **Technical and Digital Measurements:** Encryption and multifactor authentication technologies will be implemented to ensure the protection of information stored in databases and critical systems. These access control systems will ensure that only authorized personnel have access to confidential information, and periodic audits will be conducted to detect and correct potential vulnerabilities.
- **Organizational Measures:** Confidential information will be handled under strict access policies, limited to authorized personnel. In addition, confidentiality agreements will be established that will include penalties in case of improper disclosure of information. Personnel will be trained in good safety practices to prevent incidents and processes will be regularly reviewed to ensure that established standards are being met.

The implementation of these measures is aimed at minimizing the risks arising from unauthorized disclosure of sensitive information and maintaining the protection of Intangible Assets both during and after the employment relationship with employees and collaborators.

5.2. CONFIDENTIALITY

The TR Group recognizes the importance of confidentiality to protect its sensitive information and to further the development of its business. To safeguard the integrity of this information, clear principles are adopted and confidentiality agreements are formalized within the framework of labor relations, so as to ensure the effective protection of Intangible Assets both during the term of the contract and after its termination.

- **Signing of Addenda and Confidentiality Agreements:** At the beginning of the labor or commercial relationship of Técnicas Reunidas' employees, suppliers, collaborators and administrators, an addendum is signed as an integral part of the employment contract. This addendum regulates the confidentiality agreement and establishes that, due to the nature of the services rendered, the employee or the contracted entity will have access to confidential information of different types (technical, economic, commercial, legal, etc.), which must be adequately protected.
- **Definition of Confidential Information:** Any relevant data or documentation related to the technological, industrial, organizational, economic, financial, commercial, strategic or any other type of development that is the property of Técnicas Reunidas is regulated as confidential information. This information will be considered confidential even after the termination of the employment relationship, until expressly informed in writing that it has lost its confidential nature.
- **Obligations of the employee:** The employee undertakes to safeguard all confidential information with the highest level of security and not to disclose it to third parties. Likewise, you undertake to treat such information exclusively in the context of your relationship with Técnicas Reunidas and

to avoid reverse engineering, using it for commercial purposes or sharing it for unauthorized purposes.

- **Obligation of Restitution and Destruction of Information:** Upon termination of their relationship with Técnicas Reunidas, employees are obliged to return or destroy all confidential information, without this implying the termination of their confidentiality obligation.
- **Assignment of Rights:** In addition to the confidentiality agreement, Técnicas Reunidas establishes an agreement for the assignment of intellectual and industrial property rights on any creation or development carried out by the employee during the employment relationship, whether directly or indirectly related to his or her activity in the company. This assignment shall be exclusive, global in scope and for the total duration of the intellectual or industrial property rights generated.

Although the different companies that make up the TR Group operate through various divisions and areas of activity, the security and confidentiality measures set forth in this Policy apply to all of them. This ensures consistency and homogeneity in the protection of sensitive information and Intangible Assets at a global level. By clearly and specifically regulating the terms and conditions under which confidential information is handled, compliance with the **principle of transparency** is ensured, since the employee is fully aware at all times of what information is considered confidential. It also regulates the obligations and procedures to be followed for their treatment and protection, thus avoiding ambiguities and safeguarding the interests of the TR Group.

Técnicas Reunidas, in compliance with current regulations, will encourage all employees to receive adequate training in the protection of Intangible Assets, ensuring that they understand the legal, ethical and technical principles associated with their protection. This training should extend to an understanding of the importance of personal data privacy, respect for the intellectual property of third parties and the obligations associated with the use of any confidential information.

6. PROTECTION OF INNOVATION, RESEARCH AND DEVELOPMENTS

In order to promote innovation and the development of new products, services and processes that improve the competitiveness and efficiency of the TR Group, appropriate measures shall be promoted to preserve the ownership and other rights of the TR Group with respect to all inventions, discoveries, improvements, creative works or any other development carried out within the framework of its functions, or using resources and means of the TR Group, by TR Group personnel, as well as its collaborators and suppliers.

To this end, the sensitive departments or areas in the field of R&D and legal advice will ensure that all the knowledge and development generated within the TR Group is maintained as a strategic asset and strengthens its competitive position.

7. PROTECTION MEASURES

The TR Group applies a comprehensive system for the protection of its Intangible Assets, ensuring that they remain safeguarded and accessible only for authorized purposes.

To this end, the Company promotes a system that contemplates protection measures covering legal, organizational and physical and digital security aspects, establishing a robust defense against threats of loss, misuse or unauthorized appropriation, thus allowing the TR Group to maintain control and value of its Intangible Assets.

8. GOVERNANCE

8.1. THE BOARD OF DIRECTORS AND ITS COMMITTEES

The Board of Directors of Técnicas Reunidas is responsible for establishing the strategy and management guidelines of the TR Group in matters of development, responsible use and protection of confidential information and Intangible Assets, through this Policy and, where appropriate, other corporate rules in development of this Policy.

In turn, the Audit and Control Committee is responsible for overseeing the implementation and development of this Policy and the measures adopted in application thereof, as well as reviewing and, if necessary, proposing to the Board of Directors the updating of this Policy.

In order to exercise its supervisory functions, the Audit and Control Committee shall receive periodically from the Proprietary Technology Development Committee, through the Proprietary Technology Development Director, information on the management carried out by the same.

8.2. THE PROPRIETARY TECHNOLOGY DEVELOPMENT COMMITTEE

There shall be a Proprietary Technology Development Committee, which shall act as a support body for the Director of Proprietary Technology Development in the performance of his duties. The latter shall be responsible for appointing the members of the Proprietary Technology Development Committee.

Without prejudice to any other functions attributed to it, the Committee shall be responsible for the following specific functions relating to the governance of the protection and management of intangible assets:

1. **Define strategies for the development of proprietary technologies** that contribute to the improvement of the organization's Intangible Assets, establishing priorities and key areas of technological innovation.

2. **Oversee the protection and management of Intangible Assets** generated from internal developments, ensuring registration, legal protection and regulatory compliance regarding copyrights, patents and other technological assets.
3. **Evaluate and approve technological projects** based on their technical feasibility, economic impact and alignment with the strategic objectives of the organization, ensuring the generation of sustainable value.
4. **Guarantee the necessary resources** for the development of technological initiatives, including financing, tools and equipment, to promote innovation and the exploitation of intangible assets.
5. **Monitor and analyze technological and market trends** to identify opportunities and risks related to Intangible Assets and their competitiveness in the sector.
6. **Establish mechanisms for the transfer and application of knowledge** to facilitate the integration of proprietary technologies into organizational processes and train personnel in their use.
7. **Define key performance indicators (KPIs)** to measure the impact and efficiency of the technologies developed, ensuring that they contribute to the growth and protection of intangible assets.
8. **Promote internal and external collaboration** between departments, strategic partners and research centers, aimed at the creation and management of proprietary technological assets.
9. **Ensure compliance with the confidentiality measures** established in the Policy, ensuring that all sensitive information is handled in accordance with security and confidentiality protocols, minimizing the risk of unauthorized disclosure.

These functions will be developed in coordination with other areas responsible for the management of intangible assets, respecting the governance principles established by the organization.

9. MONITORING, INTERPRETATION AND REVIEW

9.1. MONITORING

Compliance with this Policy will be supervised by the Director of Proprietary Technology Development, who will be assisted in this regard by the Proprietary Technology Development Committee. Audit and periodic review mechanisms will be established to ensure that all TR Group divisions and companies comply with the established standards.

In the event of a problem or detection of an incident that may affect the operation or security of the information systems, the Technology Development Committee must be notified immediately, through the channels established for this purpose and which will be determined in the corresponding internal procedures.

9.2. INTERPRETATION

The contact body for any doubts and/or queries regarding the interpretation and execution of this Policy shall be the Proprietary Technology Development Committee, which may be contacted through the channels provided for this purpose.

9.3. REVIEW AND UPDATE

This Policy will be reviewed and updated periodically to adapt to technological advances and regulatory, organizational, technical and process changes of the TR Group, as well as to incorporate the best practices identified in the protection of Intangible Assets.

The modification and/or updating of this Policy will be approved by the Board of Directors of Técnicas Reunidas, following a report from the Audit and Control Committee, and will be disseminated to professionals and users through the usual channels.

10. POLICY DISSEMINATION

This Policy will be published on the Company's corporate website with the consequent knowledge and assumption of its full content by professionals and users. In addition, Técnicas Reunidas may require all employees and collaborators to sign a document, as an annex to their employment contract, in which they guarantee that they have read and understood this Policy, undertaking to implement it in their daily work.

Notwithstanding the above, Técnicas Reunidas will carry out communication, training and awareness-raising actions for the understanding and implementation of this Policy, as well as its updates.

In any case, it is recommended to periodically access the contents of this Policy through the available channels for a better understanding of the same, taking into account that ignorance of all or part of its contents does not exempt from its compliance.

11. CONSEQUENCES FOR NON-COMPLIANCE WITH THIS POLICY

Failure by the Professional to comply with the rules contained in this Policy shall be subject to sanctions in accordance with the applicable Collective Bargaining Agreement and current legislation, and the Professional may be sanctioned, including the termination of their employment relationship by fair disciplinary

dismissal, all without prejudice to the legal consequences that may arise from their actions in accordance with current legislation.

Likewise, and within the measures that the TR Group may adopt, it reserves the right to rectify, modify, suspend or terminate access to the Internet or e-mail service at any time, as well as to take any decision of an organizational nature to prevent the violation of these rules.

Any possible disciplinary sanctions will be imposed without prejudice to the TR Group's right to initiate the corresponding legal actions before any competent administrations and jurisdictions, regardless of whether the employment relationship is in force or has been terminated, including, but not limited to, claims for damages arising, directly or indirectly, from non-compliance with the regulations during or after the termination of the employment contract.

12. ENTRY INTO FORCE

This Policy was approved by the Board of Directors of Técnicas Reunidas at its meeting held on April 10, 2025, and will come into force as of its publication on the Company's corporate website on April 14, 2025.