

## Policy Commitments

Vulcan Energy is committed to the safe, ethical and responsible use of Artificial Intelligence (AI) across its business. This Policy sets out the high-level principles and responsibilities that guide the development, deployment and oversight of AI systems so that they are used in a manner that upholds Vulcan's values, protects people and data, and meets regulatory and stakeholder expectations.

AI governance is an important element of Vulcan's enterprise risk management approach and reflects the Company's conservative risk-based approach for emerging technologies. The management of AI risks is integrated into Vulcan's Risk Management Framework to support appropriate oversight, accountability, and alignment with best practice. AI systems may collect, process, generate or rely upon sensitive information. Vulcan applies robust data protection controls including encryption, access controls, classification, continuous monitoring and penetration testing to AI-related data and supporting infrastructure. These measures reflect the sensitivity of the underlying data and support the consistent management of AI-related risks in line with Vulcan's Cybersecurity Policy.

Vulcan Energy aims to achieve this by:

- Ensuring compliance with all applicable AI-related legislation and standards, including the EU AI Act, the EU Data Act, and the Australian Privacy Act 1988 (Cth).
- Aligning its AI governance with internationally recognised standards, including the OECD AI Principles, ISO/IEC 42001, and the Australian AI Ethics Principles, consistent with national guidance for responsible AI use.
- Conducting regular reviews of AI systems to support ongoing effectiveness, safety, and compliance.
- Maintaining documentation for AI systems to support audit, transparency, and regulatory requirements.
- Implementing AI specific risk management processes and clearly defining roles and responsibilities for AI governance.
- Providing training on ethical and responsible use of AI, and on privacy and data protection relevant to AI.
- Implementing AI bias detection and mitigation measures to promote fairness and non-discrimination.
- Protecting AI models from adversarial attacks and tampering.
- Restricting access to AI generated sensitive information in line with data governance requirements.
- Managing the use of data in AI tools, including restricting the upload of sensitive, proprietary or confidential information into external or non-approved AI systems, in line with Vulcan's data governance and cybersecurity requirements.
- Establishing monitoring and risk management protocols for AI systems, including post-deployment monitoring.
- Designing and overseeing AI systems that are transparent, explainable and auditable, consistent with regulatory expectations.
- Supporting appropriate human oversight of AI systems, proportionate to their risk.

## Responsibility and accountability

This policy will be reviewed annually and applies to all Vulcan Group directors, employees, contractors and consultants who use, develop or manage AI on behalf of Vulcan, as well as any third-party workers who supply, deploy or integrate AI systems within Vulcan's operations. The Vulcan Board retains ultimate accountability for the safe, ethical and responsible use of AI with the Audit, Risk & ESG Committee providing oversight of AI control effectiveness, and assurance activities. The Chief Information Officer is responsible for operational AI, monitoring, and control execution with employees and contractors sharing responsibility for compliance with this Policy.

The Chief Executive Officer of Vulcan Group is accountable to the Board for ensuring that this policy is implemented and adhered to.



### Cris Moreno

Managing Director and CEO

Reference	Approving Authority	Approved Date
PL-0775 V2	Vulcan Board	9 April 2026