



# **DIRECT CHANNEL**

[indracompany.com](http://indracompany.com)

# DIRECT CHANNEL

- > To be informed about the Code of Ethics and Professional Conduct
- > To communicate irregularities about its application
- > In a completely confidential way, but not anonymous

The Direct Channel (Canal Directo) is available to professionals as a **confidential method of communicating** with the Tracking Committee for the Code of Ethics and Professional Conduct on any **questions that may arise regarding how to interpret or apply this code**. This channel is also available for professionals to report on any actions they observe that do not comply with this code.

An email address ([canaldirecto@indra.es](mailto:canaldirecto@indra.es)) and a phone number (+34 91 480 70 79) have been set up to make it easier for you to communicate with this committee whenever you need to.

Using the Direct Channel, the Tracking Committee will endeavour to quickly resolve any doubts or questions that professionals may have regarding the Code of Ethics and Professional Conduct, so that employees will always know how to discern between proper conduct and unacceptable conduct.

With respect to notifying on improper conduct, the following rules are applicable when using the Direct Channel, to ensure rigour and confidentiality when processing these notifications:

1. Both the person who notifies the Direct Channel of improper conduct and the person or persons whose alleged improper conduct is being reported through this notification, must be people who work for Indra.

2. The Direct Channel is only to be used to communicate improper conduct with regard to Indra's Code of Ethics and Professional Conduct and it must never be used in reference to different spheres or with regard to anyone's personal life.

3. All communications with the Direct Channel will be dealt with in the strictest confidentiality. Anonymous communications, however, will be not accepted. The identity of the people who use Direct Channel will always remain confidential and they will not be able to be deciphered by the different members of the Tracking Committee or by the support personnel designated to this Committee.

Notwithstanding the above, and as a consequence of the investigation or inquiries undertaken in relation with a communication that is received through the Direct Channel, if the Committee reaches the conclusion that this conduct could be considered to be either an illegal criminal, labour or administrative act, Indra reserves the right to provide the authorities with all the information they require, including the identity of the persons involved.

4. The personal details that are provided through Direct Channel will be incorporated into a personal data file. This file will have high-security protection as set forth in the Spanish regulations on personal data protection.

5. The Tracking Committee will inform those persons whose conduct has been reported as improper as soon as the procedure for the situation allows this. Whatever the case, these persons will be informed within a period of 3 months from the date the initial communication is made through the Direct Channel.

These persons will be able to ask any questions they might have at this time, and present any arguments in their defence that they consider appropriate. Likewise, they will be informed on the departments or bodies within Indra that will have access to the information on the file. Notwithstanding the foregoing, the informer's identity will not be revealed at any time.

6. Both the person who notified of the conduct and the person or persons affected by it will be informed when the procedure for the situation allows this, and whatever the case, within 3 months, as to how they can exercise their rights to access, rectify or cancel their personal data, as applicable, as set forth in the regulations on personal data protection.

7. The personal data will be cancelled when it is no longer necessary or relevant and, whatever the case, within a maximum period of 2 months from the completion of the record, if the circumstances that were reported were not proven. In the event that administrative and/or judicial actions are undertaken as a result of the actions reported, the data will be cancelled once all proceedings have been definitively concluded.

Once the alleged improper conduct has been reported through the Direct Channel, the Tracking Committee will issue a report that will declare whether it has detected that improper conduct violating the principles and conduct set forth in the Code of Ethics and Professional Conduct has indeed taken place. In this case, HR management will be notified, and it will determine whether disciplinary proceedings shall be taken or sanctions issued in accordance with the labour regulations in force. This is notwithstanding the administrative, judicial or other types of responsibilities that may apply.

The creation and contents of the Direct Channel were approved by the Board of Directors in its meeting held in October 2009, subject to the prior Report presented by the Audit and Compliance Commission. This Commission also agreed to set up the Direct Channel once the all the professionals at Indra are made aware of the Code of Ethics and Professional Conduct. This Commission will supervise the Direct Channel operations.