

indra

**CORPORATE
TAX POLICY**

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CORPORATE TAX POLICY

The Spanish Companies Act establishes certain powers that may not be delegated by the Board of Directors of a listed company. These powers are set out in Article 529 *ter* of the Act, and they include, among others:

- Defining the company's tax strategy.
- Defining policy for the control and management of risk, including tax risk, and overseeing internal reporting and control systems.
- Approving investments and operations of any kind which, given their high value or particular characteristics, are strategic in nature or involve particular tax risk, unless responsibility for approving such investments or operations falls to the General Shareholders' Meeting.
- Approving the creation or acquisition of shares in special purpose entities or organisations domiciled in countries or territories that are classified as tax havens, as well as approving any other transactions or operations of a similar nature which, given their complexity, could harm the transparency of the company and its corporate group.

In the performance of these duties, and within the framework of the law, the Board of Directors has approved this Corporate Tax Policy (the Policy”).

1. PURPOSE

The aim of this Policy is to ensure compliance with the tax regulations and best practices that apply in the various countries and territories in which Indra engages in its corporate activities, and to achieve proper coordination of the tax practices applied by the different companies in its corporate group, with a view to preventing tax inefficiency and risk.

The Policy also encourages forming relationships with the authorities in respect of tax matters, based on respect for the law, reliability, trust, professionalism, collaboration, reciprocity and good faith, notwithstanding the legitimate disputes that could arise when defending the corporate interest before these authorities with regard to a reasonable interpretation of the applicable regulations. It also encourages participation in the initiatives promoted by the Tax Administration aimed at increasing legal certainty and reducing the volume of litigation.

2. SCOPE AND CIRCULATION

This Policy applies to all the companies that make up the Indra Group (the “Group”) worldwide, this being understood to mean all the organisations, both with and without their own corporate identity, that are directly or indirectly controlled by Indra. This Policy is of particular relevance to the Company’s Governing Bodies, the General Department of Administration and Finance, the Tax Department and any other corporate and business divisions that are involved in processes that may have tax-related consequences.

At companies in which Indra has a holding and in which this Policy does not apply, the Company will act through its representatives on their administrative bodies to encourage the alignment of that company’s policies with its own.

3 PRINCIPLES

3.1 General overview

This Policy has been developed with the aim of supporting the Company’s business strategy, and it is aligned both with its corporate mission of ensuring responsible management of the business, in order to maximise social impact and contribute positively to the Company’s sustainability, and with the following internal regulations:

The **Code of Ethics and Legal Compliance**, which in this regard sets out Indra’s commitment: i) to comply with its tax obligations in all the territories and jurisdictions in which it engages in its business, opting always for a prudent tax policy based on a reasonable interpretation of the regulations that apply in relation to the Company’s business activities; ii) to promote control and legal certainty when taking decisions that could have consequences of a tax-related nature; iii) to avoid the use of opaque structures for tax purposes and not to operate in territories classified as tax havens for any reason that is not based on duly justifiable commercial or business grounds; iv) to work together with the Tax Authorities and establish relationships based on respect for the law, trust, professionalism, reciprocity and good faith.

These undertakings are underpinned by the Criminal Risk Prevention Model that has been fully implemented throughout the Group and is aimed at preventing any business activities that might be in breach of the law.

- The **Sustainability Policy**, which establishes the basic principles and general action framework for managing the sustainability practices applied by Indra, which particularly include complying with the legislation in force at all times in all the territories in which Indra operates, ensuring the application of best tax practices in the communities in which the Company maintains a presence, and maintaining responsible, fluid and bidirectional communications with all of Indra’s stakeholders.

To this end, the Group will encourage alignment with the Global Reporting Initiative reporting standard 207: Tax, in relation to external tax reporting, and with the **Sustainable Development Goals (SDGs)** promoted by the United Nations, with particular commitment to Goals Ten (reducing inequalities) and Sixteen (peace, justice and effective institutions). In addition, in line with the Company’s commitment to maintaining a cooperative relationship with the Tax

Authorities, on 26 April 2023 Indra's Board of Directors approved signing up to the Code of Good Tax Practices, a code that has the support of the Spanish Tax Authority.

3.2 Principles for action in tax matters

The Group's compliance with its tax obligations will be governed, along with its relationship with the Tax Authorities, by the following principles:

1. Complying with tax regulations in the various countries and territories in which the Group operates, paying any taxes that are due in accordance with their respective legal requirements.
2. Promoting practices that are aimed at preventing and reducing significant tax-related risk, ensuring that tax payments properly reflect the structure and location of the Group's business activities, its human and material resources and its levels of risk.
3. Applying transfer pricing in accordance with the principle of open competition.
4. Not transferring created value to jurisdictions with a lower tax burden, not using opaque or artificial tax structures or structures for which there are no commercial grounds, and not using the secrecy of certain tax jurisdictions (so-called "tax havens") in order to avoid paying tax.
5. Adopting tax-related decisions on the basis of a reasonable interpretation of the regulations in force in respect of the Company's activities.
6. Complying with the internal procedures established in relation to the taking of tax-related decisions and the procedures implemented to monitor tax risk.
7. Informing the Board of Directors about the principal tax implications of the operations or matters submitted for its approval, such as operations that do not fall within the ordinary course of the company's business, corporate restructuring processes, investments, or the opening of new businesses.

4 BEST TAX PRACTICES

In application of the above principles, the Group has implemented the following tax practices:

1. Promoting practices that are aimed at preventing and reducing significant tax-related risk.
2. Minimising the conflicts that arise from interpretation of the regulations in force, favouring the use of instruments that have been established to this end by the Tax Courts (prior consultation with the relevant Tax Authorities, Preliminary Assessment Agreements, etc.).
3. Prohibiting the unlawful commission of tax offences and minimising the culpable or negligent commission of such offences.
4. Avoiding the use of opaque structures for tax purposes, this being understood to mean structures which, through the interposition of vehicle companies in tax havens or territories that

do not cooperate with the tax authorities, are designed with the specific aim of preventing the Tax Authorities from learning the identity of the party that is ultimately responsible for a business activity or the beneficial owner of the assets or rights involved.

5. The operations carried out by the Group and the structures that it employs may seek lawfully to mitigate taxes, but they may not result in deceptive activities aimed at modifying or altering the nature of the different tax bases without a valid corporate reason to justify this behaviour.
6. Where the criteria for interpreting tax are confusing or contradictory or some aspect of tax is especially complex, the Company will seek assistance from independent tax advisers and, where necessary, confirm the applicable tax treatment with the competent tax authorities.
7. Working together with the relevant Tax Authorities on the basis of respect for the law, trust, professionalism, reciprocity, good faith, and collaboration in the identification and search for solutions in respect of the tax practices that are established in the markets in which the Group operates, notwithstanding the legitimate disputes that may arise with the authorities in relation to interpretation of the applicable regulations, respect for the foregoing principles and defence of the corporate interest.
8. Providing any important tax information and documentation requested by the competent Tax Authorities, as quickly and completely as possible.

5 GOVERNANCE

The following guidelines have been established to manage tax governance at Indra Group:

- Indra's Board of Directors is responsible for defining tax strategy, a duty that cannot be delegated under the Spanish Companies Act.
- Indra's Auditing and Compliance Committee is the body responsible for reviewing current policy. It makes an annual assessment of the efficacy of this policy and adopts any measures required to ensure its proper implementation, proposing appropriate changes to the Board of Directors when these are deemed necessary.
- Senior management must comply and ensure compliance with this tax policy, both internally and externally.
- The Tax Department is responsible for monitoring and following up the proper application of the Group's tax policy through the establishment of the necessary internal control mechanisms and rules, reporting these in turn to both Senior Management and the Auditing and Compliance Committee.
- The Tax Department also plays an active role in the entire business value chain, offering advice on tax matters and ensuring that when business decisions are taken they take account of aspects relating to tax risk.

All the remaining corporate and business divisions that are involved in tax-related processes must ensure compliance with this policy in the areas for which they are responsible, where these may have implications in respect of tax, and they must report and consult on any actions or operations that may be significant in terms of tax.

6 MONITORING AND CONTROL

The Group has established a Tax Compliance Management System to ensure that, as part of their corporate management processes, all the companies belonging to the Group comply with the tax regulations and the foregoing principles, as well as meeting the Group's targets for tax compliance.

This Tax Compliance Management System establishes procedures for detecting tax-related risk along with the related controls for mitigating this risk, including specific controls relating to the management of tax risk under the System for Internal Control over Financial Reporting (ICFR). Monitoring also focuses on the detection of any new tax-related matters that could affect the Group.

Indra is firmly committed to promoting the continuous improvement of its Tax Compliance Management System.

7 DISTRIBUTION AND COMMUNICATION

Indra's Board of Directors is responsible for promoting the effective distribution of this Policy and ensuring that all of its employees, shareholders and any other interested parties are aware of both the Policy itself and any changes that might be made to it. This Policy is available for consultation on the corporate website (www.indracompany.com), and it can be accessed by all stakeholders.

This Policy was initially approved by the Board of Directors on 28 June 2018, and it was last modified on 26 April 2023.