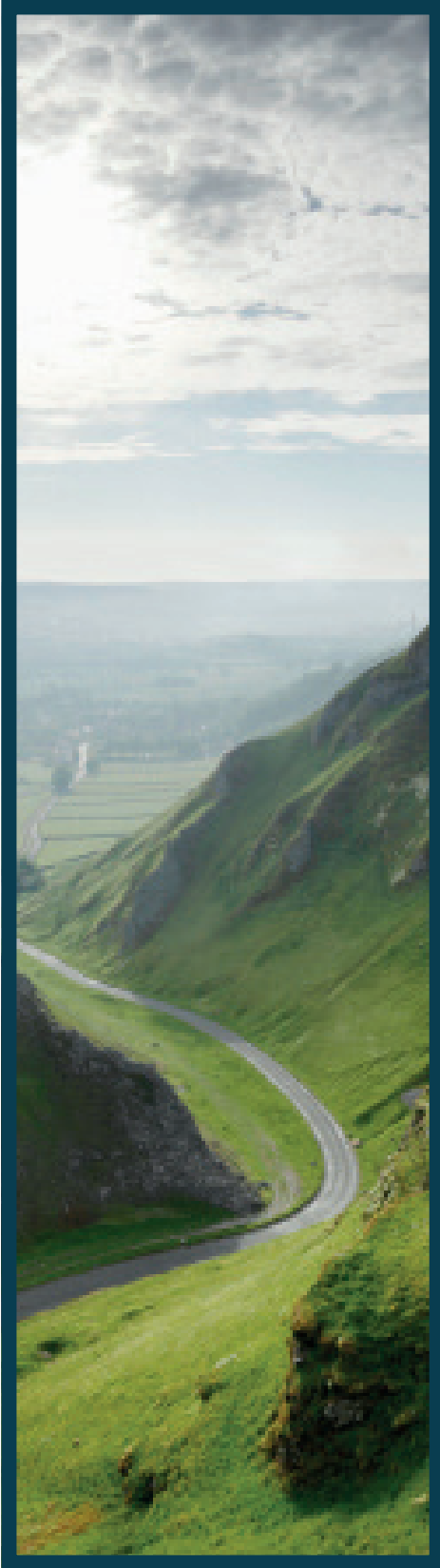


Sustainability

Sustainability Policy for Suppliers

October 2021



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Reason for change

Initial version DRAFT

1. Introduction

Indra has made a commitment to contribute to sustainable development by using technology. To this effect, Indra is aware of the importance of its supply chain for the fulfilment of its objectives, given its international operations and the impact on its turnover and volume. This document therefore establishes the basic operational principles related to ethical, social and environmental conduct that Indra expects from all its suppliers, in alignment with the ten principles of the UN Global Compact.

This Policy originates and stems from Indra's Sustainability Policy, which sets out the basic principles and general framework of action for the company's relationship with its different stakeholders and, more specifically, the commitment it has made to integrate the principles of responsibility and sustainability into the management of its supply chain.

Indra's Sustainability Policy for Suppliers (hereinafter, "the Policy") is based on the following international agreements and commitments:

- The United Nations Universal Declaration of Human Rights
- The United Nations Guiding Principles on Business and Human Rights
- The Fundamental Conventions of the International Labour Organisation (ILO)
- The United Nations Convention on the Rights of the Child
- The OECD (Organisation for Economic Co-operation and Development) Guidelines for Multinational Enterprises



2. Objective and scope

This Policy forms part of Indra's commitment to ethical conduct, as set out in the Code of Ethics and Legal Compliance and other Corporate Policies . It abides by a strategic vision for the effective integration of environmental, social and governance (ESG) issues into the company's decision-making process, the development of its products and services and its relationship with its main stakeholders.

This Policy is applicable to all Indra Group companies in global terms and must be complied with.

Indra reserves the right to request the supplier's policies, procedures and any other supporting documents that ensure compliance with these principles and undertakes to adjust such

reporting and documentation requirements to the supplier's relative size and importance with regard to the fulfilment of the company's ESG objectives. The company may also require an audit to be conducted if it deems it appropriate to do so or if one is requested by its end customers.

Any person, company or organisation wishing to be considered as an Indra supplier is expected to undertake to abide by its basic principles of action and to pass them on to its own subcontractors.

Indra will regularly review the basic principles of action and perform revisions on an ad hoc basis whenever necessary.



3. Basic principles of action for suppliers and partners

In order to fulfil its commitment to sustainable management throughout the value chain, Indra expects its suppliers and partners to comply with the following basic principles of action:

3.1 The principle of respect for legislation, ethics and compliance

Indra requires all its suppliers to comply at all times with the applicable international, domestic and local legislation.

Whenever Indra's minimum standard (included in this Policy or its internal regulations) is stricter than the applicable legislation, said minimum standard must be applied.

Indra's Code of Ethics and Legal Compliance is the reference framework that establishes the Standards of Conduct for all the company's professionals and employees. Suppliers that provide services to Indra must apply and comply with the Standards of Conduct outlined in said Code. To this effect, suppliers must duly implement and manage adequate and effective internal control and compliance systems.

3.2 Principles of respect for people

Human Rights

Indra expects its suppliers to strive to support and respect the protection of Human Rights in accordance with the United Nations Universal Declaration of Human Rights, the Fundamental Conventions of the International Labour Organisation (ILO) and the United Nations Guiding Principles on Business and Human Rights. This means that suppliers must:

- Prohibit forced labour and/or any mistreatment of their employees. This includes a total prohibition on any trafficking of human beings
- Ensure the absence of child labour
- Assign a living wage sufficient to meet the basic needs of their employees and ensure compliance with the current regulations in the countries in which they operate
- Ensure that the working hours are not excessive and that the maximum working day complies with the domestic legislation
- Respect the freedom of association of their employees

Indra expects its suppliers to have defined a policy and process to ensure that work involving slave labour and human trafficking does not occur in their supply chains or in their own businesses. At Indra's request, its suppliers shall inform it of the measures they



have taken to ensure that their operations and supply chain are free of slavery and human trafficking and the state of progress of such measures.

Health and safety

Suppliers must provide a working environment that ensures respect for the health, safety and well-being of their employees while bearing in mind the local, domestic and international standards, in accordance with the specific hazards/risks of each activity.

The appropriate measures must be taken to prevent injuries and accidents related to or occurring in the course of their work, minimising the causes of the hazards inherent in the working practice and environment.

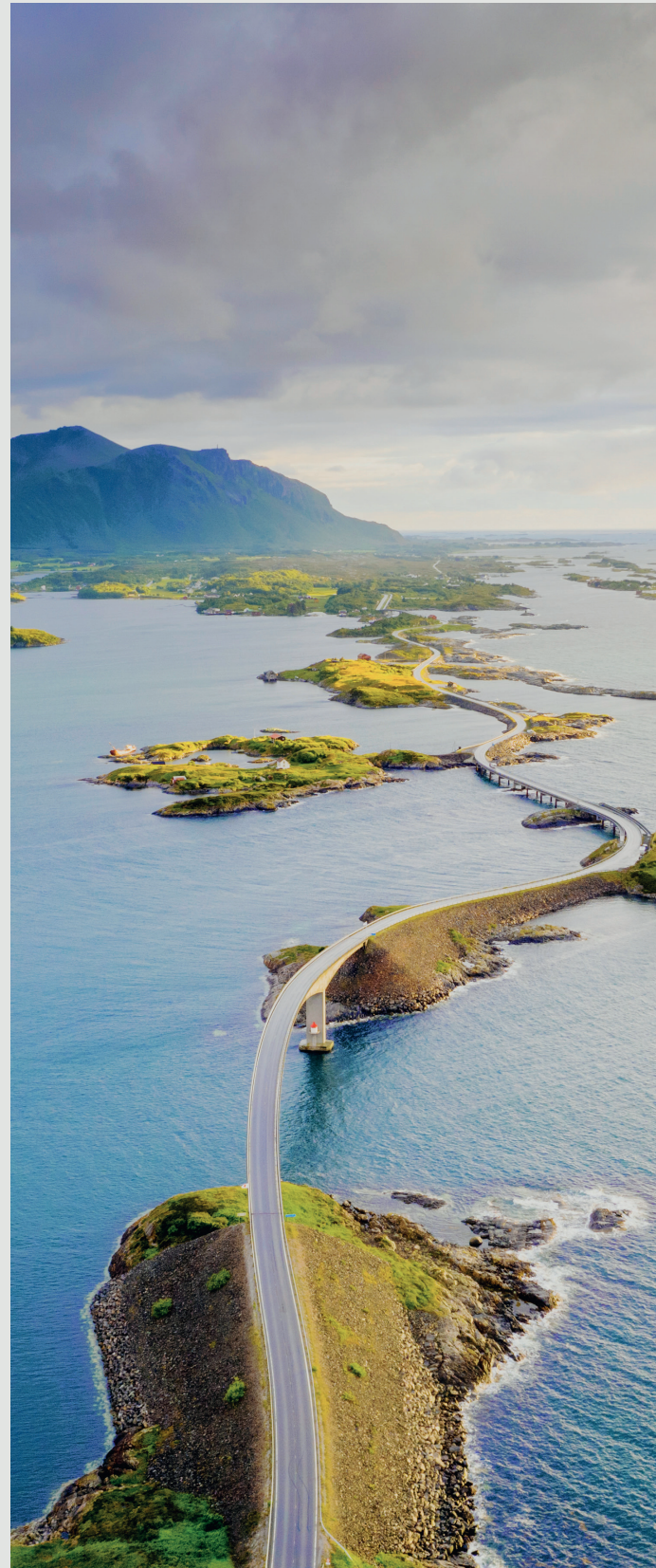
Diversity, inclusion and non-discrimination

Suppliers must undertake to treat all their employees fairly and to ensure that there is no discrimination on the basis of race, sex, age, language, religion, disability, sexual orientation, opinions, origin, economic position, birth, trade union membership or any other personal/social condition or circumstance.

Suppliers shall promote diversity and equal opportunities by means of measures that foster a work-life balance and the integration of collectives at risk of exclusion, guaranteeing the same opportunities for all their employees.

Conflict minerals

Suppliers undertake to identify whether the products, components, parts or materials provided contain minerals (tin, tantalum, gold and tungsten) from conflict regions with the appropriate measures and due diligence.



3.3 Principles of respect for the environment

Environmental legislation

Indra maintains a firm commitment to environmental protection and the transition to a low-carbon economy and actively strives to minimise the environmental impact of its value chain. To this effect, suppliers must operate in compliance with the international, domestic and local environmental legislation at all times, particularly with regard to emissions, energy, waste, resource consumption and hazardous substances.

Environmental policy and management

Suppliers, if so required by Indra, must have a documented and updated environmental policy that includes a commitment to environmental protection, biodiversity, compliance with the applicable laws and continuous improvement.

Suppliers shall ensure that they implement or are in the process of implementing a documented environmental management system to guarantee the effective planning and control of the most significant environmental aspects of their activity.

Climate change

Suppliers, if so required by Indra, shall take measures to minimise the impact of their activity on climate change, including the entire value chain (scopes 1, 2 and 3 of its greenhouse gas emissions) in this analysis. As far as possible, they shall strive to reduce their greenhouse gas emissions, defining reduction targets for the above that are preferably based on science. They shall also respond to Indra's requests for information on their greenhouse gas emissions and energy consumption corresponding to the products and services they provide to the latter.

Eco-design

Suppliers shall endeavour to apply the precautionary principle so as to minimise the potential environmental impact of their activity. In doing so they shall take into account the whole life cycle while preventing environmental pollution at all times.

As far as possible and within the context of their business relationship with Indra, suppliers shall offer products and services based on eco-design practices that take into account, among other factors, energy consumption and the incorporation of less polluting materials.



Waste

Suppliers must implement systematic waste management processes in accordance with the applicable legislation, particularly those stemming from their activity with Indra, prioritising reuse and recycling treatments whenever possible in order to contribute to the circular economy.

Single-use plastics

Whenever possible, suppliers shall endeavour to reduce the use of single-use plastics in their supplies to Indra and in their internal operations.

Hazardous substances and products

Suppliers shall comply with all the laws, regulations and requirements regarding bans and restrictions on specific substances. Hazardous chemicals and other materials included in the products, especially those listed as Substances of Very High Concern under the REACH Regulation, must be identified and handled to ensure their safe use, recycling or reuse and disposal. Their use should be prevented or, if this is not possible, minimised, in

compliance with the provisions of the above Regulation. Suppliers are obliged to provide electrical and electronic equipment in keeping with all the relevant EU standards, such as, but not limited to, RoHS and REACH, regardless of the country of use, including non-European countries. In any specific cases in which Indra so requires, suppliers must sign the environmental declaration on electrical and electronic equipment, expressly stating compliance with said regulations or, should they exist, the equivalent regulations applicable in the territory in question.



4. Consultation and complaint channels

Indra's Direct Channel (canaldirecto@indra.es and <http://canaldirecto.indracompany.com/uc/index.jsp> for anonymous communication) is available to Indra's professionals and partners (including suppliers and their employees) as a confidential way to communicate any concerns regarding the interpretation or application of the Code of Ethics and Legal Compliance and its implementing regulations, as well as for the mandatory reporting of any illicit behaviour or any irregularity or infringement detected in relation to said Code and regulations.

All the correspondence received via this channel is handled in accordance with the principles of impartiality, confidentiality and independence, with full respect for rights and guarantees in the process, both in the analysis and verification of the correspondence received and in the resolution and, as applicable, adoption of corrective measures whenever appropriate.

Suppliers must inform Indra as soon as possible if they become aware of any non-compliance with the obligations imposed by this Policy on their own part, during their own operations or in their supply chain (including their subcontractors).

5. Deployment and monitoring

The monitoring and supervision of the objectives and principles contained in this Policy are the responsibility of the Sustainability Committee, whose conclusions will be reported to the Board of Directors.

The Sustainability and Purchasing departments are responsible for managing the sustainability-related due diligence with suppliers with the participation of the corporate areas involved, and they are responsible for promoting, coordinating, measuring and reporting on the development and implementation of this Policy in global and local terms.

Indra is committed to maintaining a transparent model for the management of the Sustainability Policy for Suppliers and to disclosing both the model and the performance of its management in the annual Sustainability Report.



6. Relationship with other policies



Indra applies a set of standards that seek not only to comply with the applicable regulations, but also to incorporate the best domestic and international practices and recommendations on sustainability.

This Policy thus complements Indra's other internal regulations, particularly:

- Code of Ethics and Legal Compliance
- Sustainability Policy and related documents (e.g. Environmental Policy, Position on Climate Change and Declaration on Conflict Minerals)
- Human Rights Policy
- Criminal Risk Prevention Manual
- Risk Management and Control Policy and Risk Management manual, procedures and criteria
- Indra Project Management Method and Project Risk Management Method
- Privacy Policy
- Information Security Policy for Suppliers
- Human Resources Policies: Equality Plan, Diversity Policy, Protocol on Moral Harassment and Unacceptable Behaviour, etc
- Diversity Policy
- Occupational Risk Management System Prevention Programme
- Procurement Policies and Procedures

At the core