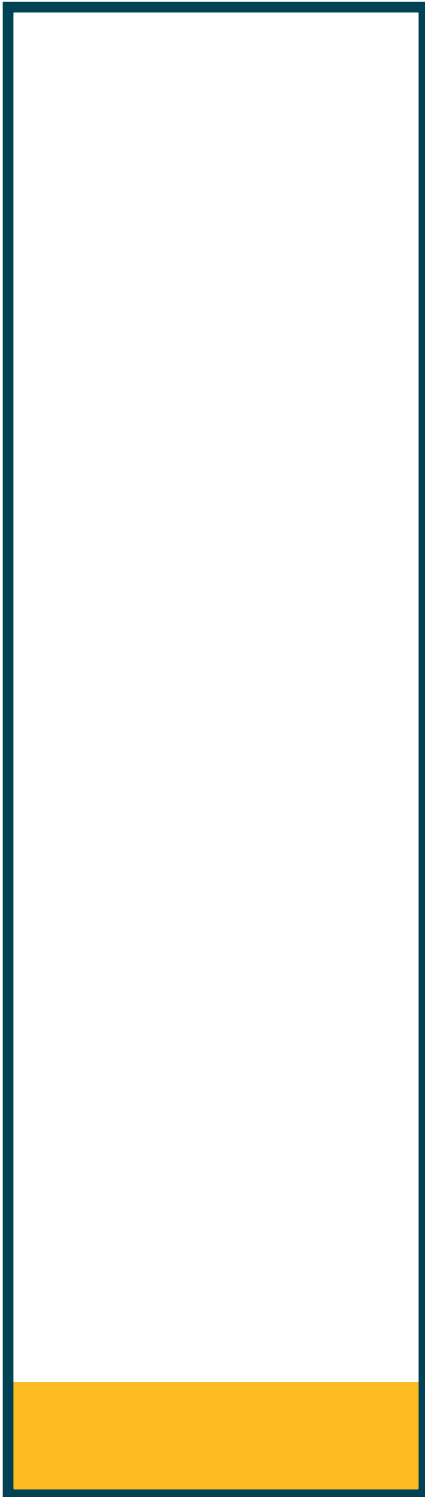


indra



Sustainability

Human Rights Policy

30th of June 2023

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1. Introduction

As a technology company seeking to promote sustainable, fair and inclusive development, Indra is firmly resolved to lead the way in protecting and promoting human rights.

Indra is aware of the impact it has on people as an employer and through the development and commercialisation of technology. It has therefore developed this Human Rights Policy to help identify and promote positive impacts throughout its value chain and minimise negative impacts on people.

This Human Rights Policy (hereinafter referred to as “the Policy”) is based on the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the following international human rights conventions and commitments:

- United Nations Universal Declaration of Human Rights
- United Nations International Covenant on Economic, Social and Cultural Rights
- United Nations International Covenant on Civil and Political Rights
- United Nations Global Compact
- Organisation for Economic Cooperation and Development’s Guidelines for Multinational Enterprises
- International Labour Organisation’s (ILO) Fundamental Conventions
- United Nations Convention on the Rights of the Child
- United Nations Convention on the Rights of Persons with Disabilities

This Policy is part of Indra’s commitment to ethical conduct, which is already set out in the Code of Ethics and Legal Compliance and other Corporate Policies¹ that directly or indirectly safeguard people’s fundamental rights.

2. Objective and scope

The objectives of the Policy are summarised as follows:

- Define the **specific commitments** that Indra assumes at a global level concerning the observance and promotion of Human Rights directly or indirectly affected by the company’s operations in the communities where it is present.
- Establish the necessary **general principles** to ensure that these commitments are integrated into the company’s business model and operations.

Scope

This Policy is applicable to and must be complied with by all Indra Group companies on a global scale. This Policy is also applicable, where appropriate, to joint ventures, temporary joint ventures and other equivalent associations when the company assumes their management.

¹ See list of related policies in section 7.

Indra's international presence means that the company coexists with a great diversity of legal systems, labour and socio-cultural environments. For this reason, this Policy and its implementation will abide by the legal frameworks in force in all countries where the company has a presence and serve as an inspiration to act beyond the legal requirements in countries with less demanding regulatory frameworks.

In those affiliated companies in which this Policy does not apply, Indra will promote, through its representatives on its governing bodies, the alignment of its own policies with those of the Company.

All professionals are obliged to know, understand and comply with the provisions contained in this Policy, especially those professionals who, due to their position of responsibility, manage teams or have decision-making, execution or influence powers.

These commitments are extended to representatives, suppliers and other third parties who provide services for Indra or who, in any way, act on behalf of Indra, such as agents, intermediaries or subcontracted companies, regardless of the territory in which they carry out their activity (hereinafter "collaborator(s)").

3. Principles of action

Indra assumes and promotes the following basic principles that should govern its actions following the United Nations Guiding Principles on Business and Human Rights:

- Establish specific commitments in terms of Human Rights and put them into practice by integrating them into the company's business model and operations.
- Apply human rights due diligence criteria to identify potential impacts on people's rights that the operations and activities carried out by the company may generate directly or through a third party.
- Develop mechanisms to prevent and mitigate human rights risks, and remedy negative impacts if they should arise.
- Promote a culture of respect for Human Rights, encouraging the training and awareness of professionals, suppliers and stakeholders.
- Ensure that employees, and in particular suppliers, share in the commitment to guarantee that Indra and its technology respect and promote human rights.
- Proactively collaborate with stakeholders to identify the most relevant issues in this area.
- Incorporate relevant human rights risks into the risk map, control systems and internal audit.

- Establish an internal control mechanism for human rights commitments².
- Communicate human rights commitments and performance in the annual reporting available to the public on Indra's website and in its Sustainability Report.

4. Our commitments

Indra is committed to **respect and promote human rights** that could be directly or indirectly impacted by its operations.

To effectively transfer this commitment throughout its **value chain**, as recommended by the **United Nations' Guiding Principles**, Indra assumes and promotes **specific commitments** associated with the areas in which it can have the greatest influence.

4.1 Commitment to professionals

Indra is committed to offering fair and decent working conditions and remuneration, and to respecting and promoting the rights of all professionals in accordance with the ILO Declaration on Fundamental Principles and Rights at Work, regardless of the area in which the company operates.

Indra has internal policies and processes to foster compliance with labour rights, preclude discriminatory practices and promote a respectful and rewarding work environment.

These commitments are primarily embodied in:

- **Promote diversity, inclusion and equal opportunities**, contributing to the wellbeing of professionals and their families by fostering a **safe, diverse and inclusive working environment**. Equal opportunities, diversity, respect for people and non-discrimination (race, sex, age, language, religion, disability, sexual orientation, opinion, origin, economic position, birth, trade union membership or any other personal/social condition or circumstance) are established as a basic principle of action in the company. Special attention will be paid to ensuring equality between men and women in access to work, working conditions and salaries. Indra rejects any form of harassment, threat or intimidation, whether verbal, physical, sexual or psychological, in the workplace.

² The duty of control is set out in the European Parliament's draft Due Diligence Directive: Human Rights Due Diligence Legislation - Options for the EU.
[https://www.europarl.europa.eu/RegData/etudes/BRIE/2020/603495/EXPO_BRI\(2020\)603495_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE/2020/603495/EXPO_BRI(2020)603495_EN.pdf)

- **Guaranteeing the freedom of association, right to strike and right to collective bargaining.** It also promotes respect for the rights of **freedom of expression** of all the company professionals.
- Establishing the appropriate measures to ensure the proper processing of the personal data of professionals to observe the **right to privacy** and protection of their data in accordance with the pertinent legislation in force.
- Providing a **safe and healthy workplace** in all facilities, through the adoption of occupational health and safety procedures and regulations.
- Boosting **local job creation** by providing young people with first job opportunities in the communities where it is present and, where applicable, consider the integration of the communities of origin.
- **Prohibition and rejection** of any form of **forced or slave labour, child labour or human trafficking** within its operations, with special attention to the rights of migrant workers.

4.2 Commitment to customers

Indra aims to develop technology with a positive impact on people and society.

Advances in technology, especially those based on advanced technologies (e.g. Artificial Intelligence, biometric identification and/ or mass use of data³) pose **new human rights challenges** in terms of security, equality, privacy or freedom of expression.

Accordingly, Indra, following the recommendations of Due Diligence proposed by the United Nations' Guiding Principles, is committed to:

- Progressing towards **measuring the impact** (direct or indirect) that Indra's technology could have on people's rights.
- Developing and providing a **secure infrastructure and services** for ensuring the confidentiality, integrity and availability of information, safeguarding it against possible attacks or unauthorised use.
- Using the **information and data of customers and end users** exclusively for the **agreed purpose** and storing them with due diligence and security, according to the applicable legislation.
- **Training and raising the awareness** of professionals continuously in the area of **privacy and information security**, applying these principles in their professional relations and ensuring that they know and apply the necessary measures to protect information in all places where it is stored, processed or transmitted.

³ The duty to identify and assess actual and potential adverse impacts associated with the enterprise' operations, products or services is set out in the OECD's Due Diligence Guide (p.29) and the European Parliament's draft Due Diligence Directive: Human Rights Due Diligence Legislation - Options for the EU.

4.3 Commitment to society

Indra is committed to promoting human rights in the communities where it operates. This commitment is embodied as:

- Maintaining **transparent and ethical relations** with regulatory bodies and public administrations in accordance with the principles and policies contained in Indra's Code of Ethics and Legal Compliance.
- Participating in public policy debates related to the **responsible and safe use of technology** and being an active agent in promoting the ethical and safe use of technologies in society.
- Practicing **responsible taxation** that brings wealth to the communities in which the company operates and in accordance with the tax legislation applicable in each case.
- Promoting **innovation** and **development of products** and **services** in Indra's offering that contribute to promoting the **fundamental rights** of individuals and society in general.
- Encourage an **open and transparent dialogue** that integrates different **cultural frameworks**.

4.4 Commitment to suppliers and collaborators

Indra respects and promotes fundamental rights in its **supply chain** and therefore undertakes to:

- Carry out a system of approval and control with the aim of ensuring that suppliers and collaborators show strict respect for the human rights recognised in national and international legislation in the development of their activity. In particular, suppliers and their employees shall: (i) adopt the necessary measures to eliminate all forms and modalities of **forced or compulsory labour** and any form of **modern slavery**; (ii) expressly reject the use of **child labour** in their organisation; (iii) respect the **freedom of association** of their employees and (iv) set the wages of their employees in accordance with applicable laws, respecting **minimum wages** and working hours.
- Promote the contracting of approved **local suppliers** and who have therefore assumed the company's ethical commitments contained in this Policy and in the Sustainability Policy for Suppliers.
- Refrain from using "**conflict minerals**" whose extraction involves the violation of human rights and/or whose revenues finance armed conflicts.

5. Query and complaint channels

The Direct Channel (<https://canaldirecto.indracompany.com> also available on the company's internal and external website and which allows anonymous communications) is the mechanism made available to Indra's professionals and collaborators, as well as other third parties with a legitimate interest, to communicate to Indra any doubts regarding the interpretation and application of this Human Rights Policy and its implementing regulations and through which any irregularity or infringement detected in relation to this Policy and related regulations or any behaviour that affects people's rights must be communicated.

All communications received through this channel are handled in accordance with the principles of confidentiality, respect, completeness, privacy and security, with full respect for the rights and guarantees in the process, both in the analysis and verification of the communications received and in the resolution and, where appropriate, adoption of corrective measures when necessary.

For more information on the operation of the Direct Channel, see Appendix 4 of the group's Code of Ethics and Legal Compliance.

6. Roll-out and tracking

The tracking and monitoring 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 unit manages human rights due diligence, with the participation of the involved corporate areas. It is also responsible for promoting, coordinating, measuring and reporting, both globally and locally, on the development and implementation of this Policy.

Indra undertakes to maintain a transparent management model for the Human Rights Policy and render both the model and the performance of its management public in the annual Sustainability Report.

7. Relationship with other policies

Indra has a set of standards that seek not only to comply with applicable regulations, but also to incorporate the best national and international practices and recommendations in terms of sustainability.

Thus, this Human Rights Policy is supplemented with the rest of Indra's internal regulations and, in particular:

- Code of Ethics and Legal Compliance.
- Sustainability Policy and related documents (e.g. Environmental Policy, Climate Change Position, Conflict Minerals Statement).
- Criminal Risk Prevention Manual.
- Anti-Corruption Policy.
- Risk Management and Control Policy, Risk Management manual, procedures and criteria.
- Indra Project Management Method and Project Risk Management.
- Privacy Policy.
- Information Security Policy.
- Human Resources Policies: Equality Plans, Diversity Policy or Moral Harassment and Unacceptable Behaviour Protocol, among others.
- Health and Safety Policy and Prevention Programme of the Occupational Risk Management System.
- Sustainability Policy for Suppliers.
- Tax Policy.