

Responsible Artificial Intelligence Policy

POL-1012

Policy

Edition: 1.0

Indra Group's Responsible Artificial Intelligence Policy establishes the general principles for the ethical, transparent and responsible use of Artificial Intelligence at Indra in order to ensure that all AI-based technological solutions that are integrated into our operations, products and services, are developed, acquired, marketed or implemented in a responsible manner transparent and secure, just as with compliance system and the current regulations applicable at all times, the applicable national and international regulations on privacy and data protection, as well as with the commitments and principles of action established in Indra's Sustainability Policy.

Scope: Global

Approved by:

The Board of Directors of Indra on 26 June 2025

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1. Purpose

Indra Group's Responsible Artificial Intelligence Policy ('Policy', 'AI Policy' and 'Indra' or 'the Company' interchangeably) establishes the general principles for the ethical, transparent and responsible use of Artificial Intelligence ('Artificial Intelligence' or 'AI' interchangeably) at Indra in order to ensure that all AI-based technological solutions that are integrated into our operations, products and services, are developed, acquired, marketed or implemented in a responsible, transparent, secure manner and in accordance with the regulations in force applicable at all times, including, but not limited to, the European Union Artificial Intelligence Regulation ('AI Act' or 'RIA'), the applicable national and international regulations on privacy and data protection, as well as with the commitments and principles established in Indra's Sustainability Policy.

This Policy is also established to:

- Prevent legal, ethical, operational and reputational risks associated with the use of AI
- Encourage a responsible culture of technology, algorithmic fairness, transparency and accountability of AI-related automated systems.
- Ensure that the use of AI at Indra is aligned with the values of integrity, respect for the law, responsibility and transparency enshrined in Indra's Code of Ethics and Legal Compliance ('CECL' or 'Code of Ethics' indistinctly), and with the values of excellence and sustainable innovation, enshrined in Indra's Sustainability Policy
- Inform and inspire correct professional conduct in the different areas and Professionals and Partners involved in the life cycle of AI systems and models, promoting collaborative governance, auditability and orientation towards operational excellence and continuous improvement in the exercise of their roles and responsibilities

'Indra' is understood to be both Indra Sistemas, S.A. and any of the subsidiaries directly or indirectly owned by Indra, in accordance with the corporate structure existing at any given time.

2. Scope

This Policy is mandatory for all Indra Professionals and Partners¹, and applies to all AI systems and models, own or third-party, that are developed, integrated or used in Indra's processes, solutions, products or services, in any of its geographies and markets.

In accordance with Regulation [EU] 2024/1689, this Policy shall not apply to AI systems which are put into service or used, with or without modifications, exclusively for military, defense, or national security purposes.

'AI systems and models' are understood to be those based on machines designed to operate with different levels of autonomy and that can show the ability to adapt after deployment, and that, for explicit or implicit objectives, infer from the input information they receive the way to generate output results, such as predictions, content, recommendations or decisions, which can influence physical or virtual environments.

The AI legislation of each country in which Indra operates may impose specific requirements not included in this Policy. As a general rule, in case there is any discrepancy between the Policy and the local rules of the country, the strictest standard should be applied. In the event that there are particularizations of this Policy in said local regulations, it will be mandatory to comply with the scope indicated therein.

Likewise, these regulations are dynamic and evolving, so this Policy will be reviewed in accordance with external or internal changes (new developments or regulatory modifications) that may occur and have an impact on it, incorporating the aspects that are considered appropriate.

¹ Professionals and Partners are understood to be administrators, managers, employees, representatives, suppliers and other third parties, such as agents, intermediaries or subcontracted companies that provide services or that, in any way, act on behalf of Indra Group regardless of the position they hold, their responsibilities, the nature of the relationship that unites them to Indra Group and the type of activity they carry out; the entities majority-controlled by Indra Group and all the persons who are part of them, without prejudice to the specific rules that may be applicable according to the legislation of each country; the administrators, professionals and suppliers of the joint ventures or other equivalent groups, when Indra Group assumes their management.

3. Introduction

As a multi-sector technology company, the development of new products, services and business models based on emerging technologies, the digitalization of processes, the recruitment and retention of talent and the development of an efficient technological infrastructure are fundamental pillars of growth for Indra Group.

The choice of appropriate technologies for project development is a crucial decision that significantly impacts both the success of such projects and the growth and sustainability of the Company.

Among the emerging technologies that may be of interest to innovative environments, Indra identifies AI as a valuable tool for project development. The most prominent benefits of using these technologies include, among others, streamlining processes, automating decisions, improving customer experience, and expanding value proposition capabilities to markets.

However, the use of AI also entails several potential risks related to Human Rights that emanate from the inherent dignity of every human being, and ensure the protection, among others, of freedom, equality and non-discrimination, safety, and health and social welfare. These risks must be identified and managed due to their great impact both on the Company and on the third parties with which it relates (customers, suppliers, business partners, institutions, etc.) and, especially, on the individuals affected, directly or indirectly, by the output results of AI systems and models.

The misuse of AI can lead not only to unintended impacts on the environment and society, but also to non-compliance with current regulations, which could result in significant financial, operational and reputational damage for Indra.

4. General principles of responsible use of AI

The Responsible Artificial Intelligence Policy constitutes the reference framework for the implementation of Indra's AI governance model, which must promote its ethical and responsible use by all its Professionals and Collaborators, and which in any case must be aligned with the national and international regulatory framework in force on the matter. As well as with Indra's Code of Ethics, Sustainability and Information Security Policy.

To this end, this Policy includes the following general **principles** for **innovation and competitiveness** in the field of AI, based on **legal certainty**, **respect for Human Rights** and **applicable current legislation**, as well as the **promotion of social welfare**.

1. The ethics of AI

Indra is committed to the universal principle '*ethics by design*' in all its AI uses. This principle informs that AI must be developed and used in all cases and in all phases of its life cycle in an ethical manner, respecting Human Rights, complying with applicable national and international laws and regulations in force, and aimed at promoting social well-being and improving the quality of life, considering social and environmental impacts.

Indra is also committed to the universal principle '*technology for good*' and declares that technological development must contribute to the common good, being inclusive, non-discriminatory and accessible to all human beings.

Therefore, AI systems and models must be developed, integrated and used in strict compliance with applicable national and international legislation, especially in matters of Human Rights and fundamental rights, ensuring the protection of personal integrity, equity in access, respect for diversity and non-discrimination, as well as the promotion of the common good in all the communities and markets in which Indra operates.

2. Transparency and explainability

Transparency is essential to encourage Indra's trust in its markets and in society. AI systems and models should operate in a transparent manner, making it easier for all users, auditors, official supervisors and other stakeholders to understand their logic, operation and decision criteria.

Explainability demands that AI processes and logic be traceable and known. Transparency, that AI processes and results are clear and understandable in their operation and decisions for all users, auditors, official supervisory entities and other stakeholders, explaining how they are taken and what data is used, what capabilities and limitations of AI systems and models are, as well as the rights that protect them.

Indra will promote the explainability and transparency, and with it, the traceability, of AI systems and models, particularly in those use cases that may affect fundamental rights or generate significant impacts, avoiding algorithmic opacity and ensuring knowledge of when interacting with an AI. To this end, it will undertake to carry out the technical documentation required by regulations, as well as to make the corresponding transparency notices to users.

Transparency is essential to demonstrate compliance and oversight of AI systems and models, and this rests on explainability, which is also essential to facilitate monitoring and preventive or remedial interventions on AI systems and models.

All this, to reinforce confidence in Indra's AI systems and models, on all markets and society.

3. Information Security

AI systems and models will comply with the principles established in Indra's Information Security Policy, which, in turn, are developed in the Information Security Regulatory Framework where the minimum action in this area is established, with the aim of guaranteeing the confidentiality, integrity and availability of the information they store, process or transmit.

Therefore, technical solutions aimed at guaranteeing the Information Security of AI systems and models appropriate to the relevant circumstances and risks will be applied, thus ensuring protection throughout their life cycle.

4. Privacy

It is critical to protect personal information and manage data securely, confidentially, and ethically throughout the AI lifecycle. This includes implementing robust security measures and strict privacy policies to prevent unauthorized access and misuse of data. AI tools will be resilient against unauthorized access attempts, alteration of their use or performance, and against illicit use by malicious third parties, always ensuring continuity in the provision of services.

The processing of personal data in AI systems and models shall strictly comply with the European General Data Protection Regulation ('GDPR') and any other regulations applicable in the jurisdictions where the Company operates.

Indra will ensure responsible governance of data (personal and non-personal) throughout the AI lifecycle, ensuring the minimization, accuracy, ownership and representativeness of the data, the lawfulness of the processing, including the non-infringement of the intellectual property rights of third parties, the integrity and confidentiality of the information, as well as the implementation of impact assessments on the rights and freedoms of natural people where appropriate.

5. Technical robustness

The AI systems and models deployed by Indra must be technically sound, accurate, resilient, secure and reliable, minimizing the risks of failures and vulnerabilities to adverse conditions, avoiding unpredictable behavior, manipulation or damage. In addition, contingency plans must be in place to promote the rapid recovery of the normal functioning of the system in the event of an incident.

To this end, design, rigorous testing and validation methodologies will be applied to ensure the reliability of its behavior under normal and extreme conditions, reducing the possibility of failures, undetected biases or technical vulnerabilities and attempts to alter its use or operation.

Continuous maintenance and post-deployment monitoring will be essential conditions for continuous improvement and risk prevention.

6. Equity, Non-Discrimination and Inclusivity

AI must not reproduce or amplify historical, social or statistical discrimination that negatively affects individuals or groups based on the processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical convictions, or trade union membership, based on genetic data or biometric data aimed at uniquely identifying a natural person, or by virtue of data relating to the health or data relating to the sex life or sexual orientation of a natural person.

Indra is committed to preventing any form of discrimination, exclusion or unequal treatment, which violates the right to equality, derived from the use of AI systems and models.

AI must be developed and used in a fair and inclusive way, respecting diversity and plurality effectively.

Universal accessibility to AI systems and models will be promoted, in accordance with the principles of inclusive design, allowing their equitable use by people with different abilities. In addition, the design of these AI systems and models must avoid perpetuating stereotypes, paying attention from their design to the data sources and neutrality of the samples used, supported by data governance practices.

7. Promotion of Competition and Competitiveness in Markets

AI should be developed and used in a way that fosters fair, open, transparent and competitive markets, avoiding being facilitators, directly or indirectly, of anti-competitive practices in markets, contrary to applicable competition law.

In this Policy, Indra states the prohibition of the development of AI models and systems for the purpose of collusion, which allows the coordination of prices, strategies or any commercially sensitive information between competing companies.

8. Human Intervention and Supervision

It is essential that there is human oversight in the use of AI systems and models, especially in decisions that significantly affect the health, safety or fundamental rights of natural person. People will need to be aware of and be able to intervene and correct automated decisions, when necessary, while maintaining human autonomy and protecting individuals affected by AI from potential errors or abuses.

Indra will promote that automated decision-making will have significant human supervision, especially in those cases that may affect natural person, their rights or their legitimate interests. People should be able to understand, question and, where appropriate, request a review of decisions taken by AI systems and models, for which they will receive training ('literacy') appropriate to the role played and their degree of interaction with AI.

Human intervention will not be symbolic, but structural in key processes, in accordance with the requirements of the AI Act and the principles of ethical control and responsibility. It must also comply with the principle of competence, ensuring the functional and technical criteria of supervisors, and the availability of experts from certain fields, when necessary, due to the context of functional use of the system: doctors, sociologists, pedagogues, etc.

9. Sustainability

The development, use and maintenance of AI must incorporate criteria of environmental sustainability, energy efficiency and reduction of carbon footprint, in line with Indra's Sustainability Policy. To this end, the measurement of the social and environmental impact of AI will be promoted, as well as its contribution to the development of society.

Indra will promote the design of AI systems and models with the lowest computational consumption and the highest possible reuse, as well as the regular evaluation of their environmental impact. Whenever possible, *Green AI* practices shall be applied to ensure efficient infrastructures and alignment with general sustainable use and reduction to light algorithms policies.

The energy consumption of AI, as well as the associated GHG emissions, will be reduced as far as possible by using renewable energy, embedded low-emission hardware or software and hardware services that already ensure the minimization or neutrality of GHG emissions so that it is aligned with Indra's Net Zero strategy.

AI must contribute to the Sustainable Development Goals (SDGs) and to the fair and inclusive progress of the societies where Indra operates.

10. Responsibility and Accountability

Accountability for the decisions and outcomes of AI systems and models involves monitoring and correcting errors or unwanted behaviors and ensuring that there is a human touchpoint to address any issues or misuse of the technology.

Indra is committed to establishing clear mechanisms of responsibility for the design, use, development, marketing, supervision and results of AI systems and models, such as rigorous control of users and actors and versioning control.

Each phase of the AI life cycle will be assigned supervisory functions, allowing any misconduct, error or deviation from the ethical and legal framework to be detected, reported, corrected and documented.

Accountability will be enforceable, verifiable and traceable, and adequate records will be maintained to allow effective internal and external audits.

11. Responsible Innovation

Indra will promote technological innovation based on AI as a driver of transformation and competitiveness, always framed in respect for Human Rights and in the corporate ethical values of integrity, respect for legality, responsibility and transparency enshrined in Indra's Code of Ethics and Legal Compliance, as well as in the values of excellence and sustainable innovation, enshrined in Indra's Sustainability Policy.

This involves considering the social and ethical impact of new technologies before they are implemented, ensuring that advances pursue the common good and are beneficial to society.

Priority will be given to developments that provide positive social, economic and environmental value. AI will not be used for purposes contrary to the law or business ethics.

In addition, AI systems and models and their components shall be developed and deployed considering ethics and rights of use (intellectual property) and shall be appropriate to the context of use (principle of suitability).

5. Approval

The Indra Group Board of Directors, within the framework of its continuous commitment to business integrity, strict regulatory compliance and sustainable development, as well as to the different requirements of its stakeholders, expresses its determination and commitment to establish a reference framework for the implementation of Indra's governance model for the responsible use of AI.

Tech for the future

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