

Code of Ethics and Legal Compliance

This Code of Ethics and Legal Compliance is intended to serve as an inviolable framework of reference by setting forth Conduct Standards that are binding on all Professionals and Partners of Indra.

Board of Directors of Indra on 23 July 2025

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Institutional Message

The **Board of Directors of Indra Group**, through the **Code of Ethics and Legal Compliance**, shares with all its stakeholders a message of **determined commitment** to the **compliance with the current legislation applicable** to all local and international markets where the Company operates, as well as a strong opposition to any illegal act or conduct that, in any way, challenges this Code of Ethics, its implementing regulations or any relevant law in force.

This Code of Ethics is the upmost regulation within the Company, that gathers these **general principles: integrity, compliance with the law, responsibility, and transparency** that must lead to any **professional activity** performed by any natural person or entity that acts on behalf of Indra.

The active involvement and supervision of the Board of Directors and the senior management is an essential part of the Indra management system. For this reason, the Board of Directors has implemented a **Compliance Model** that includes as main element this Code of Ethics. Under the Audit and Compliance Committee's ('ACC') supervision, the Compliance Unit ('CU') enforces this Compliance Model in all the Company, as a corporate function responsible for ensuring compliance with the applicable regulations, including the Model, acting independently from the business and under the direct supervision of the ACC.

The Model, the Guides that are included within it (Criminal Risk Prevention Guides and Antitrust Risk Prevention Guides) and the Code of Ethics and its implementing regulations have been designed in line with the best practices and highest international standards of good corporate governance, and are the grounds for the determined commitment of the Board of Directors of Indra with the active and effective prevention and mitigation of, among others, risks of carrying out crimes, antitrust practices, and the most relevant impacts regarding sustainability, and aligned with ESG criteria defined in the Sustainability Policy and, finally, with the integrity and responsibility that must guide the performance of all Professionals to develop and keep a **strong Compliance culture**.

This Code of Ethics was approved by the Board of Directors of Indra dated December 22nd, 2015; subsequently, it has been updated by the Board of Directors on October 27th, 2017, December 18th, 2020, April 26th, 2023, July 29th, 2024 and July 23rd, 2025.

1. Purpose

This Code of Ethics and Legal Compliance (Code of Ethics') was drawn up to provide an insurmountable reference framework by establishing Standards of Conduct for all Indra Professionals and Partners. The absolute responsibility of each Professional and Partner is to 'do the right thing' and, for this reason, Indra provides them, and other third parties with a legitimate interest according to the circumstances of the case, a channel to report and consult ('Direct Channel'), which is the preferential confidential line to (1) communicate to the Company any doubts regarding the interpretation and application of this Code of Ethics and its internal implementing regulations¹, and (2) to which they must report any infringement related to the aforementioned Code of Ethics and internal implementing regulations, as well as other infringements or unlawful acts.

2. Scope

This Code of Ethics is applicable and mandatory for Indra Professionals and Partners. Indra shall be construed as Indra Sistemas S.A. and any of the companies in which Indra Sistemas S.A. has a direct or indirect interest, in accordance with the existing corporate structure at any time.

This edition 5.1 voids and supersedes the previous edition 5.

3. Definitions and acronyms

¹ The internal regulations referred to in this Code of Ethics are published on the Company's internal website and, if applicable, in the external website; and they also form part, as appropriate, of the various contractual instruments that bind Indra Group to its Professionals and Partners; additionally, they will be provided to them, where appropriate, upon reasoned request to the Direct Channel (<https://canaldirecto.indracompany.com/>).

These definitions are set to provide a uniform and coherent understanding of this Code of Ethics and its internal implementing regulations. The following definitions shall have the same meaning regardless of whether they appear in the singular or plural throughout the document:

- **General Purchasing Conditions:** establishes the terms and conditions governing the purchase orders that Indra issues to the supplier, in all matters that are not in contradiction with the specific conditions that may have been agreed with the supplier.
- **Misconduct or unethical conduct:** any improper act or omission or exercise of influence on others to act improperly or omit to act properly in the exercise of their professional duties in a manner contrary to the expectation of good faith, impartiality or the duty of confidence arising from the performance of their professional duties.
- **Conflict of Interest:** a factual situation that arises when the personal, professional, financial or other relationships that concur in a person interested in a Professional or Partner of the Indra, or in any Person or entity linked to it, interfere or may interfere with the objectivity and impartiality that should govern the performance of their professional duties.
- **Corporate Courtesy:** any gift, gratuity, favour, benefit, loan, commission, discount, indulgence or other tangible or intangible item of monetary value given or received in the context of a business/institutional relationship between Professionals and Partners and third parties.
- **Mainly state-owned enterprises:** an entity or body that is owned or controlled (more than 50%) by a government or body of a public nature because its regulatory rule on aspects such as the formation of its will, its legal nature, the election of its members is of a public nature.
- **Public Official:** any person who, either individually or as a member of a corporation or collegiate body, **national or foreign**, has command, exercises jurisdiction or participates in the exercise of public function on a permanent temporary basis, whether or not for remuneration for his services and whether or not he has acceded to such office by immediate provision of law, election or appointment by a competent authority.

In any case, as a guideline and not limited to, they will be considered as Public Officials for the purposes of Indra internal regulations:

- non-elected candidates of political parties or who have a relationship with foundations or other non-profit entities linked to political parties,
 - those carrying out or participating in the exercise of electoral functions,
 - Heads of State, members of governments, administrations or legislative bodies at state, autonomous, local or supranational level,
 - members of the judiciary (attached to ordinary or special courts) and of the Public Prosecutor's Office, members of constitutional bodies (Constitutional Court, Court of Auditors, Ombudsman or other bodies that may exist in other jurisdictions),
 - senior management positions in trade union organisations,
 - directors, deputy directors and members of the board of directors or equivalent function of international organisations,
 - professionals of mainly state-owned enterprises.
- **Related Person or entity of an Indra Professional or Partner** (hereinafter referred to as, 'Related Person'):
 - the spouse or person in a similar relationship to the Professional or Partner
 - the siblings, ascendants and descendants of the Professional or Partner, as well as their spouses or persons linked by an analogous relationship of affectivity to them
 - siblings, ascendants and descendants of the spouse or person with analogous relationship of affectivity of the Professional or Partner
 - uncles, aunts, cousins, nephews and nieces of the Professional or Partner, as well as their spouses or persons in an analogous relationship of affectivity to them
 - persons acting on behalf (legal or voluntary) of the Professional or Partner, whether acting on behalf of such Professional or Partner or in their own name

- legal entities or organisations without legal personality in which the Professional or Partner, or any of the natural persons referred to in the preceding numbers, holds directly or indirectly, including through an intermediary, a participation which gives him/her significant influence or holds a position in the administrative body or in senior management in them or in their parent company

For these purposes, significant influence is presumed to be conferred by any holding equal to or exceeding 10% of the share capital or of the voting rights or by virtue of which it has been possible to obtain, de jure or de facto, representation on the company's management body.

- **Professional (s) and Partners(s)** : the directors, managers, employees, representatives, suppliers and other third parties, such as agents, intermediaries or subcontracted companies that provides services on that, in any way, act on behalf of Indra regardless of the position they hold, their responsibilities, the nature of the link that binds them to Indra and the type of activity they carry out: the **entities mainly controlled by Indra** and all persons forming part thereof, without prejudice to the specific rules applicable according to the legislation of each country; the directors, professionals and suppliers of the **joint ventures or other equivalents groupings**, when Indra assumes their management.

4. Flowchart and responsibility diagram

Not applicable.

5. Description

5.1. Compliance with the law

Indra is committed to carrying out all of its activities in compliance with current and applicable legislation in all of its areas of activity and in all of the countries in which it operates. Consequently, the conduct of **Professionals and Partners** will be governed by their firm commitment with the law and the **10 Standards of Conduct** that are stipulated and explained in this Code of Ethics and its internal **implementing regulations**, rejecting corruption and any illegal practice., anticompetitive practices and the disclosure of information from Indra (unauthorized disclosure, whether accidental or intentional) and any unlawful practice.

Likewise, Professionals and Partners will fully abide by the obligations and commitments assumed by Indra in its contractual relations with third parties, as well as international best practices. It is forbidden for Professionals and Partners to collaborate with third parties in the violation of any law or in actions that, although legal, could compromise respect for the principle of legality, damage Indra reputation or harm the perception of Indra by institutions or other interested parties.

5.2. Relations with Public Administrations, governments and authorities

The business relations of all Indra Professionals and Partners with the Public Administration, governments and authorities, or regulatory bodies, both national and foreign, must always be governed by the principles of integrity, **respect for legality, responsibility and transparency**, which requires that these interactions always be precise as to the reason and the institutional or commercial purpose of the interaction. Under no circumstances will Indra finance, directly or indirectly, either in Spain or abroad, political parties or their representatives or candidates. Indra Professionals and Partners who interact with personnel in the service of any Government, Public Authority or Administration or Regulatory Body shall use clear, simple and objective language, reducing any type of interpretation that differs from what is intended to be conveyed.

Without prejudice to the foregoing, if a Professional or Partner receives requests for non-routine meetings or documentation from any Public Administration, they must immediately inform the Indra Legal Department, which is responsible for their management, or communicate the matter through the Direct Channel (<https://canaldirecto.indracompany.com/>).

5.3. Standards of Conduct

5.3.1. Zero Tolerance for corruption, bribery and fraud

No Indra Professional or Partner is allowed to participate, directly or indirectly, in bribes to authorities and/or Public Officials, directors, Professionals or partners of entities unrelated to Indra Group. Similarly, no Indra Professionals or Partners may accept, request or receive payments, gifts or other services or corporate courtesies from persons or entities outside Indra that are beyond the lawful market practices.

Indra decisively rejects corruption and bribery in compliance with this Code of Ethics and the **Anti-Corruption Policy**, which is mandatory for all its Professionals and Partners. This Policy, as a development to this Standard of Conduct, defines certain prohibited conducts similar or related to corruption, such as bribery, obstruction of justice, influence peddling, illegal financing of political parties and collusion or defrauding the State; and also compiles the set of internal anti-corruption procedures, thus ordering the regulations in this area and facilitating its knowledge and consultation.

In addition, Indra forbids any fraudulent act from any of its Professional or Partner, deeming as fraud any conduct that, by action or omission, concealment or breach of trust, has the objective of obtaining an improper advantage for the individual that commits fraud or for the Company, as it is established on the **Fraud Prevention Protocol**.

What is bribery?

Mainly, there is an active form of bribery and a passive one. Generally speaking, **bribe (active)** involves **promising, offering, giving or facilitating** to a person, directly or indirectly, **any unjustified benefit**, monetary or otherwise, in order for that person to act improperly. **A bribe (passive)** also is committed when a **person requests, accepts or receives** from other person, directly or indirectly, such a **benefit** from another person in return for an – also improper – earlier, simultaneous or later action. Bribery is usually intended to obtain a commercial or economic benefit or advantage for the person who commits it, although the purpose or motive for the action is irrelevant to the existence of the bribe, this means that the promise, offer, deliver, facilitation, request, acceptance or reception of any unjustified benefit are, by themselves, necessary and enough to be deemed as a bribery. It also makes no difference whether the intended action is within the scope of the bribed person's competence or not.

When it comes to bribery, we have to keep in mind that:

- A simple promise or offer of a benefit suffices for bribery to exist, with no need for the material delivery effective granting of the benefit.
- Anyone can be bribed; while bribery is generally associated with Public Officials, bribery also occurs between private individuals.
- The beneficiary of the bribe can be a natural or legal person.
- In passive bribery, inappropriate actions by Indra Professionals or Partners could benefit the briber or a third party.
- Individuals can also be bribed, including directors, managers, Professionals or partners of a company or a corporation, association, foundation or any other type of organization.
- Bribery can be committed indirectly, i.e. via intermediaries or third parties such as commercial/business/sales consultants, advisers, commission agents, agents or nominee companies.
- The benefit offered with the bribe need not necessarily involve money; it could be any kind of consideration in kind, such as gifts, travel or entertainment.
- Passive bribery exists, regardless of whether the benefit is obtained by someone other than the person (for example, a family member or friend) of the Professional or Partner of Indra who accepts it.
- Bribery also includes so-called 'facilitation payments', i.e. payments of amounts of delivery things, even if the amount or value of such payments is small, made to public officials to expedite or facilitate administrative procedure.

We cannot make a definitive list of situations of **corruption or bribery** because there are countless ways in which they could occur. However, some of them are listed below, yet are not limited to:

- A consultant or provider seeking a high fee in connection with the service provided. It is not proportional in economic and commercial terms.
- A third-party request that part of its fees be paid into a bank account other than the one contemplated in the contract that Indra signed with it.
- A third-party request that its fees (or part thereof) be paid in cash.
- A commercial/business/sales consultant or supplier unjustifiably requests additional amounts to the contractually agreed fees.
- During the course of a tender or request for proposals in which Indra is participating, even the contact has not been awarded yet, a Public Official of the organization that called the tender or a third party on behalf thereof, requests that a donation be made to a specific non-profit association, or that a firm commitment be made to carry out a specific subcontract for the project.
- A supplier frequently invites an Indra Professional or Partner to lunch, dinner or any other leisure activity.
- A customer is invited to visit Indra's facilities for one week, paying for the entire stay and all expenses for the customer and accompanying family members, including various leisure activities.

Commercial consultants, Strategic advisors and similar service suppliers

Bribery can be committed indirectly, i.e. via intermediaries such as commercial/business/sales consultants, commission agents, agents or other advisers. These third parties commit bribery on behalf of Indra, even though the company is not directly involved in the bribery, yet the legal consequences are the same as if the bribery had been directly committed by an Indra Professional or Partner.

Commercial consultants, agents, representatives and similar advisors must be conceived as Partners of Indra in opening up markets, garnering new business and promoting the Indra brand and, as such, must apply the same principles and ethical values that Indra advocates, since they act as Professionals or Partners of Indra in short, they must reject and completely abstain from carrying out, in the same way that Indra does, any actions that constitute corruption or bribery.

Therefore, Indra has a procedure that regulates the Company's contacts, relations and contracts with these kinds of suppliers, which are, the **Procedure for hiring commercial consultants**, the **Procedure for hiring strategic advisors** and the **Procedure for hiring market consultants** that provide for certain control measures in addition to the general ones stipulated in the procedures for engaging 'politically exposed persons'².

These procedures are included in Indra internal regulations and must be known and observed by all Professionals and Partners who maintain relations with these suppliers.

Corporate Courtesy

Under no circumstances may Indra Professionals and Partners make business courtesy, also commonly known as 'hospitality' or 'corporate gift', for any illegal purpose.

² PEP – 'Politically Exposed Persons' – are considered those individuals who are or have been entrusted with prominent public functions by election, appointment or investiture, in Spain or any other country. This category comprises, among others: heads of states and governments; ministers and other government members; secretaries/sub-secretaries of state; Members of parliament; judges of high judicial bodies and courts; board members of central banks; senior-ranking personnel of the armed forces (For Spain, generals and admirals or the equivalent rank in the case of other countries); the heads of the entities of the state public sector or dependent on the general state administration. This definition includes the family members and close associates of the aforementioned individual. The classification as Politically Exposed Person also includes companies or entities for-profit or non-profit among whose partners or shareholders with an ownership of over 50%, including administrators or executives of any of the individuals included in the preceding sections and. Likewise, State-Owned Enterprises (S.O.E.) will be regarded in this way. When the individuals referred to in the preceding sections have ceased to perform their functions, they will continue to be considered politically exposed for two years following the termination of office. For members of the board of directors, directors or holders of equivalent functions of international organizations, the period will be five years. Former heads of state or government and ministers will always be considered to be politically exposed persons.

However, it is socially permitted in many countries as part of a company's own business and/or institutional activity, the Corporate Courtesy could constitute a corruption or bribery practice in some local legislations, especially if it is construed as an action that could influence in the decision of the person that receives such Corporate Courtesy

Therefore, it is important to clearly define the criteria to bid or accept Corporate Courtesies, depending on the circumstances.

By **Corporate Courtesy** one can consider- with illustrative purpose, not as a definitive list - any gift, hospitality, favour, benefit, loan, fee, discount, indulgence or any other tangible or intangible item that has a monetary value done or received in the context of a commercial/institutional relation between Indra Professional and Partner and third parties.

As examples, Corporate Courtesies can be considered:

- Presents or gifts (e.g., objects of symbolic and no significant economic value, promotional items or those from the corporate gift catalogue).
- Invitations to meals.
- Invitations to events of a commercial or institutional nature and the expenses related to attending them (e.g., accommodation, transport and meals).
- Invitations to entertainment activities (e.g., sporting, leisure or cultural events).

The recipient of a Corporate Courtesy may be a natural person or an entity. On this matter, the Corporate Courtesy can be **active** or **passive** depending on whether it is given to or received from a third party in the said commercial/institutional relation context.

General criteria on Corporate Courtesy

To prevent Corporate Courtesy from constituting or being interpreted as corruption or bribery, any manifestation of Corporate Courtesy must comply with the following general principles, in other words, it must be:

- **occasional**, this is, it must be a one-off situation for the receiver/giver of the Corporate Courtesy and, in any case, it must only be performed once for each commercial/institutional relation,
- **reasonable**, this is, it must be socially accepted, and not specifically prohibited by current local legislation, and
- **prudent**, this is, its economic value must be symbolic and not significant, and shall not be objectively understood, by itself and considering the circumstance of the person receiving it, with enough value to influence his or her decision-making capacity.

The economic value of the specific Corporate Courtesy is not the only factor that influences whether or not it qualifies as acceptable Corporate Courtesy, but it is one of the factors that, in the absence of other evidence, can be decisive. The relative value that it has for the recipient, according to his or her personal economic circumstances, will also be decisive in this regard.

Therefore, every time an Indra Professional or Partner plans to give a Corporate Courtesy to any third party, they must consider whether said Corporate Courtesy complies with the principles set forth above. If any of them fail to be fulfilled, the Corporate Courtesy shouldn't be done.

The same approach should be taken by any Indra Professional or Partner when accepting a Corporate Courtesy from any third party. If the Corporate Courtesy offered fails to comply with any of the principles set forth above, the Indra Professional or Partner must reject or return the Corporate Courtesy offered or received.

Specific criteria on Corporate Courtesy

In addition to the general criteria mentioned above, it is also necessary to meet and comply with the following specific criteria regarding Corporate Courtesy:

i) Corporate Courtesy from Indra Professionals or Partners

- **The active or passive Corporate Courtesy related to Public Officials shall be assessed with special attention** due to the particular circumstance in which Public Officials are, for their power

to make decisions over the public activities and resources and may in such cases result in the materialisation of risks like bribery or other similar ones or related prohibited conduct. Nevertheless, and regardless of what is later set for tickets to entertainment events, presents and other kind of gifts to Public Officials or any other Corporate Courtesy, listed on this Code of Ethics or that in any way are socially permitted [1] must not be in any case non-compliant with the pertinent **legislation currently in force**, [2] shall comply with aforementioned general principles of **occasionality, reasonableness and prudence**, and [3] must not exceed the **maximum amount of €100 (or its equivalent in local currency)**.

- Indra Professionals, when placing a Corporate Courtesy, will always opt for **items catalogued** as such by Indra Purchasing area, through which they will process the corresponding order. For other gifts, the written authorization of your immediate supervisor's superior is required.
- It is **absolutely forbidden** to **give gifts of cash equivalents**, nor any form of Corporate Courtesy to family, friends or other persons or entities related to customers or potential customers of Indra or other third parties.
- The economic value shall in all cases be in accordance with the **Travel Policy and Employee Expense Liquidation Procedure**. This Policy establishes a maximum amount of representation expenses for gifts and meals **in each geography**.
- Neither is allowed any Corporate Courtesy which compensation is not economic (e.g., contracting promises, undue favours in a supplier selection process, disclosure of confidential information, promises to refrain from participating in a particular tender, etc).
- The use of tickets to entertainment events as a Corporate Courtesy will always be exceptional and must follow the rules established below.

The following are absolutely forbidden:

- so-called 'facilitation payments',
- Corporate Courtesies of any sort and amount whenever local law does not permit a Public Official to accept any type of gift, and
- gifts and hospitality, or any type and amount, to any person that, in any way, is involved in an ongoing public or private bidding process in which Indra, directly or indirectly is participating or plans to participate. Similarly, even when the tender or request for proposals is not formally called, yet is well known or very likely to be called, we will act in the same way.

The use of tickets to entertainment events as a Corporate Courtesy must have the approval of the person in charge, in writing and prior to the acquisition (internal or external) of the tickets. Those responsible for approving such acquisitions must submit to the Institutional Relations department each of the approvals they make, as soon as they occur and including the same information specified below for the Institutional Relations record.

The Institutional Relations department will keep a record of all purchases from these locations, identifying: type and number of seats acquired, date of acquisition, area and applicant thereof, individuals who will use the tickets, their organization and position held therein. This record will be always at the disposal of the Compliance Unit.

The following guidelines should be observed when Indra organizes acts or events of a commercial nature aimed at promoting its solutions and services:

- The event or act must have a clear and concrete commercial purpose or objective related to the promotion of Indra services or products.
- If a gift is given during the event or in conjunction with the event itself, the guidelines for such gifts set out above must also be observed.
- If guests from different companies or organizations attend the event, they should all be treated equally (accommodation, transport, meals, etc).
- Any invitation to an event organized by Indra must be made officially and formally, and also communicated to the line manager of the event organizer or, in the case of the Partners, whomever serves as the organizer.

- Given that Corporate Courtesies are forbidden for family members and other people associated with customers, potential customers or other third parties of Indra, it is absolutely prohibited to incur any expense in regard to family members or other companions of the people invited to the event.
- When Public Officials attend the event, it is essential to check that local legislation does not prohibit Public Officials from accepting invitations.
- When Public Officials attend the event, it is essential that the organizer obtains written authorization from his or her line manager or from the person acting in the case of Partners.
- It is forbidden to bear any sort of expenses regarding Public Officials who, in any way, are involved, in an ongoing tender process (including requests for proposals) in which Indra, directly or indirectly, is participating or plans to participate. Equally, even when the tender or request for proposals is not formally called yet is well known or very likely to be called, we will act in the same way.

ii) Corporate courtesy received by Indra Professionals or Partners

- It is absolutely forbidden to accept gifts of cash or cash equivalents.
- It is forbidden for Indra Professionals or Partners to accept Corporate Courtesy in any of its forms for the benefit of their families, friends or other persons related to them.
- The amounts of gifts and hospitality received by the Indra Professional or Partner, as well as the authorizations in the event that these amounts are exceeded, shall be governed **by Employee Travel and Expense Guidelines**.
- When Indra Professionals or Partners attend acts or events of a commercial nature aimed at promoting the products and services of suppliers or other third parties, the following guidelines should be observed:
 - The event or act must have a clear and concrete commercial purpose or objective related to the promotion of the services or products of a provider, supplier or third party.
 - If a gift is given during the event or in conjunction with the event itself, the guidelines for such gifts set out above must be observed.
 - If guests from different companies or organizations attend the event, the Indra Professional or Partner must refuse treatment or higher quality care than that received by the rest of the participants (accommodation, transportation, meals, etc).
 - If the event organizer has not issued a formal invitation, a written request must be made and the invitation must be communicated to the line manager or, in the case of Partners, to the person who will act in his or her place.
 - Attendance at the event shall be of a professional nature, so that the spouse or family member may not be accompanied, unless expressly organized, complying with the principles of occasionality, reasonableness and prudence and obtaining the prior written authorization of the hierarchical superior or whoever is acting in his or her stead (Partners).

Donations and Sponsorships

Likewise, it is strictly forbidden for Indra Professionals and Partners to make Donations or Sponsorships that are unjustified or for illicit purposes, and they must therefore comply, in all cases, with the procedures established internally for this purpose.

Any Donations and Sponsorships involving Indra must contribute to creating a strong, cohesive brand that is aligned with the organization's strategy and objectives. This must be its ultimate goal. However, similar to Corporate Courtesy, Donations and Sponsorships must satisfy criteria of reasonableness, proportionality and prudence in the circumstances in which they are made; otherwise, they could become forms of bribery.

In this regard, all the Company's actions regarding Donations and Sponsorships must be analyzed within the framework of this Code of Ethics and, likewise, comply with the specific procedure for their authorization, this means, the **Donations and Sponsorships Regulations. Membership and**

Contributions to Foundations, Associations or other similar entities, included in the Company's internal regulations and aimed at its Professionals.

General criteria on Donations and Sponsorships

The essential general principle that should be borne in mind for any Indra's Donation or Sponsorship initiative is its contribution to the creation of a strong and cohesive brand aligned with the organization's strategy and objectives and corporate image.

Innovation and talent constitute the cornerstone of Indra's strategy, business model and sustainability as a company. Accordingly, it is essential for Indra that the organization's Donation and Sponsorship initiatives are aimed at reinforcing that image and brand so that Indra is perceived as an innovative company brimming with talent.

However, with a view to prevent Donations and/or Sponsorships from constituting or being understood as a means or practice of corruption or bribery, all company Professionals requesting any Donation or Sponsorship initiative must strictly comply with the provisions of Indra's internal regulations, which govern and set the quantitative and qualitative limits of such Donations and Sponsorships and the corresponding authorizations.

Specific criteria on Donations and Sponsorships

In addition to the foregoing general principles, the following specific criteria must be addressed and met regarding Donations and Sponsorships.

Donations

At Indra, we want to be an active agent in the universal access to technology, with special attention to the sectors and geographies with the greatest difficulties in such access, precisely because our solutions and services are developed in the field of new technologies, with respect to which it is important to highlight their social value. Therefore, one of our objectives consists in promoting greater equality in relation to the use of new technologies so that they result in a better quality of life for all.

Accordingly, Indra's Donations must serve as a reflection of this commitment to society. However, Indra's social commitment and responsibility in relation to the communities in which it operates also includes the provision of aid in the event of natural disasters and, in general, relief aid. Consequently, Indra will endeavor to ensure that these Donations are as close as possible to the criteria set out above: to facilitate universal access to technology. Donations will thus be made in accordance with these guidelines:

- Initiatives to support technological development for disadvantaged groups.
- Initiatives to provide aid for disadvantaged groups.
- Initiatives to support innovation and the implementation of the Information Society.
- Donations of IT equipment to foundations and associations.

Sponsorships

The Sponsorship initiatives of Indra should seek to reinforce Indra's activities and business in terms of promotion and/or to reinforce the brand image with the company's stakeholders. In this regard, sponsorship initiatives may materialize in contributions in cash or in kind for the organization of events or activities related to:

- our solutions and services,
- our markets and areas of activity,
- external relations forums and
- corporate image improvement.

Other Sponsorship initiatives related to technology, innovation, talent attraction and development, knowledge generation and dissemination, reduction of the digital divide, environmental preservation and sustainability are also valued.

5.3.2. Conflicts of interest

All Indra Professionals and Partners must maintain and ensure impartiality in the performance of our duties, responsibilities and professional decisions, especially in any situation that may involve a Conflict of Interest, understood as any situation in which the Professional or Partner could, directly or indirectly, obtain a personal benefit, regardless of whether or not Indra also obtained any benefit, or there could be a clash between their interests and those of Indra.

The Conflict of interest may affect our judgment and objectivity. There is also a Conflict of Interest when personal interest refers to a Related Person of the Indra Professional or Partner.

By its very nature, a Conflict of Interest can take many forms, and it is therefore impossible to anticipate a fixed list of situations. However, some of them are listed below as examples:

- The Indra Professional or Partner has knowledge of or participates in any way in negotiating any commercial agreement between Indra and a Related Person or that Professional or Partner.
- The Indra Professional or Partner, or a Related Person, thereof is shareholder, administrator or manager of a company that is or seeks to become a customer, supplier, competitor or partner of Indra.
- The Indra Professional or Partner or a Related Person thereof is a partner, administrator, director or manager of non-profit association or organization with which Indra maintains or plans to maintain some type of relationship.
- The Indra Professional or Partner participates in any way in selection process for a job at Indra for which a Related Person has applied.
- The Indra Professional or Partner has, or may have, powers of supervision or hierarchical control over another Professional or Partner who is a Related Person.

What should be done in a Conflict of Interest situation ?

Should a Conflict of Interest arise, the Professional or Partner affected by it must inform the Company for its resolution through the Direct Channel and via the Statement included in **Annex 1**.

This communication should be made as soon as the Conflict of Interest situation becomes known. It should also be carried out when, even though a conflict situation is not yet underway, there is a chance that it could occur.

Indra Professionals or Partners affected by a Conflict of Interest situation will abstain from participating in the process or decision in which it has taken place in any way.

In any resolution or decision regarding a Conflict-of-Interest situation, priority will always be given to Indra's interests, avoiding in any case that the conflict situation remains or persists.

5.3.3. Defence of free and fair competition

Indra is committed to **complying with the rules and principles of free and fair competition** in all markets where it operates, competing on equal terms and avoiding any distortion that could hamper effective market competition. Consequently, Indra Professionals and Partners must refrain from any practice or conduct that, in any way, aims to restrict or distort free competition.

Thus, Indra prohibits any conduct that implies restrictions or limitations to free competition, and in particular, but not limited to, the following:

Collusive Conduct

Indra Professionals and Partners shall avoid any agreement, decision, collective recommendation or concerted or consciously parallel practice that has the purpose, actually or theoretically having an effect of preventing, restricting or distorting competition, among others:

- setting prices or other commercial conditions or services conditions,
- limitation or control of production, distribution, technical development or investments,
- sharing of the market / public or private tenders/ projects / customers / geographic areas or sources of supply. For example, through the solicitation or acceptance of cover bids (so that the

award of the contract goes to the pre-agreed company), bid rotation (agreement to take turns in awarding contracts) or no bidding (after agreement with the competitor),

- exchanges of confidential information between competitors that could influence their commercial strategies (including prices, sales, discounts, salaries and incentives or customers),
- agreements with other companies on employee wages or any other aspect of their compensation policies or working conditions, or
- non-aggression pacts between companies for the recruitment of certain employees or giving notice before attempting to recruit employees.

Abuse of dominant position

Indra Professionals and Partners will avoid the abusive exploitation of any potential dominant position in the market that it operates. Abusive practices can comprehend, but are not limited to, the following:

- the application of dissimilar conditions for equivalent performances, putting some competitors at a disadvantage compared to others,
- unjustified refusal to meet demands for the purchase of products or the provision of services,
- subject the sign of contracts to the acceptance of supplementary performances which, by their nature or according to commercial usage, have no connection with the subject matter of such contracts,
- the reduction of prices below costs with the aim of eliminating competitors or preventing their entry, or
- limiting production, distribution or technical development to the unjustified detriment of undertakings or consumers.

Unfair acts or distorted competition that affect the public interest

Indra Professionals and Partners will avoid any action that could constitute unfair competition. Therefore, it is absolutely forbidden to carry out misleading advertising, transmit or omit information that does not conform to the reality of our goods or services and/or that could be misleading, and make statements about the activity, products or services of a competitor to undermine its reputation in the marketplace.

Additionally, when the Company's Professionals or Partners have access to third party information, including competitor information, they must comply with the legally established requirements, as well as the Standards of Conduct on Information Security established in this Code of Ethics.

5.3.4. Information Security, Data privacy and intellectual and industrial property

Indra ensures the security of its information, customers and suppliers. Indra's **Information Security Policy** establishes principles that are essential for achieving this objective which, in turn, are developed in Indra's **Information Security Regulatory Framework**, which establishes the minimum standards of action in this area and are mandatory for its Professionals and Partners.

- **Duty of responsible use of information resources and systems**

Indra owns and holds **the rights to use all the IT and communication media and tools** that it makes available to its Professionals and Partners for performing their duties.

Indra Professionals and Partners must use corporate resources and information systems only for the Company's own professional purposes, in strict compliance with the applicable legal regulations and the rules of use established by Indra as set forth in **the Information Security Manual for Users and the Information Security Manual for Suppliers**.

Each Indra Professional or Partner is responsible for the use they make of the corporate resources and information systems, both those that Indra makes available to them for the performance of their professional work, as well as those of third parties related to Indra, such as customers and suppliers, and must protect them from any damage, deterioration or alteration.

If we carry out our work in networks other than Indra's, we must also comply with the security regulations of the owner or manager of the network.

Indra's information resources and systems are continuously monitored and supervised in order to ensure compliance with **Indra's Information Security Regulatory Framework** and the prompt detection of security incidents. In the event that a breach or incorrect, improper or unauthorized use of the information resources and systems is identified, Indra may take the legal, technical or contractual actions necessary to protect its rights.

- **Duty of notification of Information Security risks and incidents**

Any Professional or Partner who has knowledge or indications of any situation that affects or may affect Indra's Information Security, including weaknesses or threats to the systems that support it, is obliged to report it immediately so that the appropriate measures can be established. The communication may be made through any of the following channels: CSIRT of the Information Security Division csirt@indra.es, to the User Service Center (USC) or to the Direct Channel (<https://canaldirecto.indracompany.com/>)

- **Obligation to protect information and to comply with data protection regulations**

Indra defends the effective application of the Privacy by design and Privacy by default principles, with the aim of guaranteeing the right to privacy and the protection of personal data of the groups and interested parties on which Indra develops its projects and services, this effective application is always carried out in strict compliance with current legislation. To this end, it ensures that all Professionals and Collaborators carry out the processing of personal data in accordance with the guidelines established in the internal regulations that develop the Indra's Privacy Policy.

It is the obligation and responsibility of each of Indra's Professionals and Collaborators to protect and respect the information we handle and, among all this information, of particular relevance is all that which may affect the most intimate sphere of the individual. To this end, and in accordance with the highest market standards, Indra establishes the appropriate security measures to protect it in all those places where it is stored, processed or transmitted, in order to guarantee its **confidentiality, integrity, availability and permanent resilience**.

All Indra Professionals and Partners must comply with the security measures defined according to the classification of the information handled in our work as established in **the Information Classification and Processing Manual**.

- **Obligation to protect intellectual and industrial property**

It is strictly forbidden to reproduce, copy, plagiarize, distribute, modify, transfer or communicate, in whole or in part, products owned by Indra (software and any IT solutions or products, methodologies, industrial designs, trademarks, trade names, patents and other similar products) without the prior written authorization of the Company as set forth in the **Intellectual Property Policy**.

Similarly, it is also strictly forbidden to reproduce, copy, plagiarize, disseminate, modify, assign or disclose, in whole or in part, the aforementioned products that are the property of third parties without the proper prior written consent thereof. These third parties are not only Indra's customers and suppliers, but any individual or entity outside Indra, even if they have no relationship with the Company.

Likewise, the installation or execution of programs or files with the purpose of suppressing or violating the protections and security systems of the resources and information systems of Indra or its customers is prohibited.

5.3.5. Sustainability

Indra's sustainability strategy aims to respond to present and future social and environmental challenges by creating value for stakeholders and generating a positive impact on the environment. The sustainability strategy is structured around four axes of action: Governance and business integrity, Planet and Climate Change, Responsible products and services and Professionals, clients and other stakeholders.

As part of its ongoing commitment to ethics and sustainable development, as well as to the different requirements of its stakeholders, Indra has a **Sustainability Policy**, inspired by the UN Sustainable Development Goals, which aims to respond to the expectations of its stakeholders, using the main

international standards. Indra's **Sustainability Policy** is (i) the reference framework for the effective integration of environmental, social and good governance (ESG) issues in the Company's decision-making process, in the development of its products and services and in the relationship with Indra's main stakeholders and (ii) applicable and mandatory for Indra at a global level, extending to all its suppliers through the **Sustainability Policy for Suppliers**.

Indra is committed to contributing to sustainable development through innovative technology that respects the environment and has a positive impact on the planet. We also recognise the impact of the company's activities on the environment and are therefore committed to developing a business model that respects the environment.

These commitments are described in the Indra's **Environmental Policy**, which is applicable and mandatory for all Indra Group companies on a global scale. Indra Professionals and Partners must support this commitment and carry out their activities with total respect and guarantee for the environment.

For this purpose, it is an indispensable condition for all Professionals and Partners:

- Comply with environmental legislation in all territories where Indra is present and operates.
- Ensure that relevant environmental commitments are incorporated into the company's management and decision making and extended to the supply chain and other stakeholders.
- Carrying out the company's activities in such a way as to prevent and minimise its impact on the environment, adopting the necessary measures for the rational and efficient use of resources and water; the appropriate management of waste; the prevention of pollution.
- Encourages the development of technologies and products with a positive impact on the environment and incorporates sustainability criteria in the design and development of the offer from the beginning.
- Assume a commitment to the fight against Climate Change and decarbonisation in the company's operations and facilities, in line with the agreements established in the United Nations Framework Convention on Climate Change, the European Union and/or the governments of the countries in which Indra operates.

Likewise, Indra is committed to act with leadership in the protection and promotion of **Human Rights** that could be directly or indirectly impacted by its operations. The basic principles that Indra assumes and promotes are described in the Indra's **Human Rights Policy**. Thus, Indra is committed to respecting the Human Rights recognised in the framework of the Guiding Principles on Business and Human Rights of the United Nations Organisation, in the International Bill of Human Rights and the principles relating to rights established in the Declaration of the International Labour Organisation.

The Human Rights Policy is applicable and must be complied with by all Indra companies on a global scale and all Indra Professionals and Partners must support this commitment and carry out their activities with full respect and guarantee of human rights and civil liberties. To this end, it is an essential condition for all Professionals and Partners to:

- Keep a zero tolerance approach to child and forced labour and is fully committed to preventing slavery and human trafficking in operations and in the supply chain.
- Respect and promote the rights of all professionals in accordance with the ILO Declaration on Fundamental Principles and Rights at Work regardless of the field of operation.
- Develop technologies and products responsibly and provide secure infrastructure and services ensuring the human rights of individuals and customers in terms of security, equality and privacy.

Finally, Indra is committed to promoting and maintaining mechanisms that guarantee the identification, analysis and adoption of best practices, principles and recommendations in the area of **corporate governance**, both national and international.

5.3.6. Equality and Non-Discrimination. Occupational health and safety

5.3.6.1. Equality and Non-Discrimination

All Indra Professionals and Partners must apply and promote the principles of equal opportunities, diversity, personal respect and equal treatment and non-discrimination (by race, sex, age, language,

religion, disability, sexual orientation, opinion, origin, economic position, birth, union membership or any other personal or social condition or circumstance) with the aim of ensuring safe and diverse labour environments.

Indra categorically rejects any behaviour or attitude of a Professional or Partner that could constitute moral, sexual or gender-based harassment, or that in any way violates the dignity of individuals, in accordance with international, European and national principles and regulations, as well as the Company's internal regulations.

This Standard of Conduct is complemented and developed in **the Moral Harassment Protocol and Unacceptable behaviour** and in the **Sexual and gender-based Harassment Protocol**, which establish the specific procedures to prevent and manage them and the consequences specifically applicable in this area, in any way that may occur. Any communication regarding conduct that may constitute harassment must be immediately reported to the Company through the Direct Channel (<https://canaldirecto.indracompany.com/>) to then transfer it to the Labor Relations area, which is responsible for its processing and resolution in accordance with the provisions of the corresponding Protocols, guaranteeing, in any case, the confidentiality, objectivity and effectiveness of the actions carried out.

The only valid criteria used by Indra to evaluate its Professionals and Partners are those that exclusively measure their performance, effort and talent, with absolute independence from any personal condition or circumstance.

5.3.6.2. Occupational health and safety

Indra has properly assessed the risks inherent to the different activities that its Professionals carry out, establishing the appropriate **preventive measures** for the correct performance of work duties by its Professionals and Partners, who are responsible for rigorously complying with health and safety regulations in the workplace and for ensuring their own safety and that of the people affected by their activities. Preventive measures in the form of actions, techniques, adaptation of spaces, procedures, training, etc. are mandatory for all Indra Professionals and Partners.

5.3.7. Economic-financial responsible and transparent management

5.3.7.1. Best accounting practices

Integrity as a guiding principle of Indra's activity is based on the need for information to be transparent, a basic feature that should govern the actions of Professionals and Partners.

Indra's economic and financial information, especially financial statements, will faithfully reflect its economic, financial and equity reality in accordance with generally accepted accounting principles and international financial reporting standards, wherever applicable. Accordingly, no Professional or Partner shall conceal or distort the information in Indra's accounting records and reports, which shall be complete, accurate and truthful.

In accordance with their functions and corresponding tasks, Professionals and Partners must ensure that the facts relating to the management of the Company's operations are correctly and truthfully reflected at the accounting level. Each operation must be based on adequate and verifiable documentation. The useful principles for accounting and management activities are correctness, integrity and transparency, in full compliance with the pertinent legislation currently in force.

It is therefore prohibited to provide incorrect or misleadingly organized information.

5.3.7.2. Best tax practices

Indra activity entails the adoption of a set of decisions that have an impact on taxation. Indra, in line with the Tax policy approved by the Board of Directors that observe the international best practice on tax matters, is therefore committed to complying with its tax obligations in all territories and jurisdictions where it carries out its activities, always opting for a prudent tax policy based on a reasonable interpretation of the applicable regulations and linked to the company's activity.

Aiming to guarantee greater control and legal certainty in the decision-making process that could have tax-related consequences, Professionals and Partners whose activity or decision-making process involves significant tax related consequences must adapt their actions to the law, also complying with the internal procedures established in relation to tax decision-making and tax risk control procedures,

informing, if necessary, their line manager or whoever is acting on behalf of the Partners, in order to prevent tax-related risks derived from the Company's ordinary and extraordinary activities.

Indra also undertakes to avoid the use of opaque structures for tax purposes and not to operate in territories considered to be tax havens for reasons that are not duly justified for commercial or business reasons.

Indra undertakes to cooperate with the Tax Authorities and establish relationships based on respect for the law, trust, professionalism, reciprocity and good faith, all of these principles are based on the Code of Good Tax Practices of the State Tax Administration Agency, to which Indra adhered by approval of the Board of Directors in April 2023.

5.3.7.3. Responsible management of public funds

Indra Professionals and Partners must proceed with absolute truthfulness in all phases of the public aid and subsidy management process (RD&I: Research, Development and innovation).

All the countries where Indra operates prohibit and sanction subsidy and public aid fraud, which is why it is essential that the information provided by Indra to obtain external funding for innovation be complete, true and faithful.

Subsidies and public aid are granted subject to compliance with a certain related purpose and specific conditions, which must be properly accredited to the body granting them, both in the application/granting phase and in the execution phase of the project that constitutes their object.

Each participant or actor in an innovation process must bear in mind that the following actions are strictly forbidden at Indra:

- The falsification, alteration or omission of any data or information required in the process of applying for, obtaining, executing and justifying the subsidy or public aid.
- Failure to comply with or alteration in any way of any of the conditions stipulated or manner of execution of the project for which the subsidy or aid was granted.
- The falsification, alteration or omission of any data or information on the project under execution in the corresponding monitoring reports and/or justification reports to the corresponding public agency or to the auditing entity designated by said agency.

Conditions, requirements or information that are concealed or misrepresented may also relate to a variety of elements or factors of the public subsidy or aid: not only must the information provided be true and complete with respect to the administrative conditions of the subsidy or aid, but also with respect to the project to be subsidized, the business plans associated with it, the material or human resources to be used and any other elements relating to the project for which the grant or aid is requested.

The amount of the subsidy or aid must be used or allocated in full and exclusively to the project for which it was granted, i.e. it may not be used, in full or in part, for other projects, nor may the subsidized project be altered or modified. The project must be executed and complied with in full as presented to the body granting the subsidy or aid.

5.3.8. Foreign trade of defense materials and dual-use goods

Indra's activity frequently entails **exporting and importing** Defense Material and Dual Use Goods, so it is absolutely necessary to ensure compliance with the regulations governing this matter, so that all exports and imports of such materials and/or technology are carried out with the proper authorizations and in strict compliance with the law.

Defense Material is defined as weapons and all products and technologies specifically designed or modified for military use, in addition to those intended for the production, testing or use thereof. Dual-Use Goods are defined as products and technologies, including software, commonly used in the civilian field but which may have military applications.

Transactions related to Defense Materials and Dual-Use Goods include definitive exports and imports, and even temporary exports and imports (repairs, revisions, free replacement of defective material, returns to origin, tests, fairs or exhibitions), rectifications (within the validity period of the licenses or authorizations granted), production agreements under license, intermediation or brokerage activities and exports and imports under outward and inward processing.

All Indra Professionals or Partners who are aware of the need or probability of exporting or importing Defense Materials and Dual-Use Goods as part of a proposal or commercial operation must immediately inform the Company's Export Control area by sending an e-mail to the following address: exportcontrol@indra.es and for any incident in this matter, must immediately inform the Direct Channel (<https://canaldirecto.indracompany.com/>) and scrupulously comply with the internal regulations, as well as with the sanction programs applied by the Governments in this matter.

5.3.9. Money laundering and terrorist financing prevention

Indra is firmly committed to not engaging in practices that could be considered irregular in the course of its relations with customers, suppliers, competitors or authorities, including any related to the laundering of money derived from illegal or criminal activities.

Indra also undertakes to comply with all statutory and applicable norms and provisions, both national and international, in the fight to mitigate money laundering and terrorism financing. In case of any doubt that may arise in the day to day activity on this matter, the people involved should immediately refer to the Direct Channel (<https://canaldirecto.indracompany.com/>).

5.3.10. Ethical, transparent and responsible use of artificial intelligence (AI)

As a multisectorial technology company, Indra considers Artificial Intelligence (AI) to be a key emerging technology due to its potential to optimize processes, automate decision-making, enhance customer experience, and broaden its value proposition. Despite its benefits, the use of AI entails a series of significant risks (legal, ethical, operational and reputational) that must be properly managed, as their materialization could impact both the Company and its stakeholders.

The **Responsible Artificial Intelligence Policy** of Indra (hereinafter, 'AI Policy') sets forth the general principles governing the ethical, transparent and responsible use of AI at Indra are intended to ensure that all AI-based technological solutions integrated into its operations, products, and services are developed, acquired, marketed or implemented in a responsible, transparent and secure, in strict compliance with the applicable legal framework in force at any given time, including both national and international regulations on privacy and data protection, as well as the commitments and principles of conduct established in Indra's Sustainability Policy.

The general principles enshrined and articulated in the AI Policy, aimed at fostering innovation and competitiveness while ensuring legal certainty, respect for human rights, and contribution to social well-being, are as follows: ethical use of AI, transparency and explainability, information security, privacy protection, technical robustness, fairness, non-discrimination and inclusiveness, promotion of market competition and competitiveness, human oversight and intervention, sustainability, accountability and responsibility and responsible innovation.

5.4. Ethical commitments of Indra suppliers

Indra considers compliance with its Code of Ethics of utmost relevance, which is expressly accepted by suppliers when they sign the General Purchase Conditions at the beginning of their contractual relationship.

The provisions of this Code of Ethics are understood without prejudice to the additional obligations that may be established in current legislation applicable in the different markets and geographies where Indra carries out its activities and in the different contracts with each supplier, which will always be applicable.

Indra suppliers will ensure that their own suppliers are subject to principles of action equivalent to those contemplated in the Indra p Code of Ethics, extending it to their respective supply chains.

Suppliers will develop their commercial relationships based on principles of business ethics, competitiveness and quality, and must comply with the standards of conduct contained in this Code of Ethics as well as with international agreements and laws in force and applicable in each of the markets in which they operate.

5.5. Direct Channel

Indra provides all its Professionals and Partners, and other third parties with a legitimate interest according to the circumstances of the case, the Direct Channel, that is part of the Internal Whistleblower Information System ('System') of Indra, being the **confidential and preferential channel** available at the Company's internal and external websites, together with its own website <https://canaldirecto.indracompany.com/>.

The **Direct Channel Policy** comprises the essentials for its regulation.

The purpose of the Direct Channel is to:

- Let the Professionals and Partners to comply with their **duty to communicate** any detected **illicit behavior, irregularity or infringement** against the Code of Conduct and its internal implementing regulations, aligned with the Direct Channel Policy.
- **Submit questions** regarding the interpretation and application of the Code of Ethics and its internal implementing regulations.

Indra's **CU** is the body that manages the communications received through the Direct Channel and the **Responsible of the System** is the ultimate responsible, coordinating the UC's members appointed by it in each moment; all of them responsible of its management, in compliance with the law and the internal implementing regulations.

The procedure to be followed by the CU in the processing, investigation and resolution of complaints or reports is detailed in the **Direct Channel Management Protocol**, which comes from the Direct Channel Policy, developing it and it is part of the internal regulation of Indra, available to all the target population of this document.

The CU's actions, in all cases, are carried out under the principles of **impartiality, confidentiality and independence**, answering in the period outlined based on the Direct Channel Management Protocol and the legislation in force.

The availability of the Direct Channel shall be understood notwithstanding the existence of other **external information channels** that may be enabled for this purpose by the public bodies thus established in accordance with the legislation in force in each country and, as the case may be, by the institutions, bodies or agencies of the European Union.

The prohibition of any form of retaliation against professionals and/or partners who, in good faith, (i) report to Indra any type of violation or unlawful act (including any form of bribery or suspicion thereof), or (ii) cooperate in its investigation or assist in its resolution, is firmly enshrined in the Direct Channel Policy (POL-1011) and the Direct Channel Management Protocol (MAN-1111). Notwithstanding the above, appropriate disciplinary or legal measures may be pursued against individuals acting in bad faith, including those who submit false, misleading, or unlawfully obtained information.

5.6. Consequences of non-compliance with the Code of Ethics

Indra will adopt appropriate and proportionated disciplinary measures, always complying with the law in force at the time, (1) against the Professionals directly or indirectly involved in any infringement of the Code of Ethics and internal implementing regulations, this is, against those people involved with the Company by a labour relationship; (2) against the Partners, with whom Indra can terminate the existing professional relationships on the grounds of the infraction .

5.7. Dissemination, communication, training and continuous improvement

This Code of Ethics is **communicated and disseminated** to all Professionals and Partners, who will be adequately informed of its content and mandatory compliance and will be part of the professional relationship between them and the Company through the corresponding labor contracts, commercial contracts, hiring processes and approval of suppliers or other forms of express adhesion.

The internal regulations implementing this Code of Ethics are published on the Indra's internal website and, as appropriate, on the external website.

Indra conducts a **training plan on Ethics and Compliance**, and on **Competition Law**, which is being managed by the Compliance Unit in coordination with the Human Resources area. This training is **mandatory** for all Professionals and Partners.

In order to maintain a suitable, effective, and robust control environment, Indra undertakes to perform ongoing activities aimed at ensuring the continuous improvement of its Compliance Model.

ANNEX 1: Conflict of Interest Statement

MR/MS:

ROLE:

AREA:

HEREBY DECLARES:

To be familiar with the content of the guidelines for conduct regarding Conflicts of Interest included in Indra’s Code of Ethics and Legal Compliance.

To be presently unaware of the existence of any personal, economic or professional situation that may affect the independence and impartiality of the performance as a Professional or Partner³ and that may give rise to a conflict of interest, except for the following circumstances:

Data on the conflict of interest situation:

To undertake to immediately report any changes in the aforementioned circumstances regarding the conflict of interest.

Date:

Signature:

³ A **Professional** or **Partner** means any director, manager, employee, representative, supplier or any other third party who provides services for Indra Group or who, in any way, acts on behalf of Indra Group, such as agents, intermediaries or subcontracted companies, that render services or that, in any way, acts on behalf of Indra Group regardless of the role that they hold, their responsibilities, the nature of the relationship with Indra Group and the activity that they may perform; the **entities mainly controlled by Indra Group** and all the people that are part of them, without prejudice to the specific legislation that may be applicable in each country; the administrators, professionals and suppliers of **JVs or other similar associations/organizations**, when Indra Group take on its management.

Tech for the future

Avda. de Bruselas, 35
28108 Alcobendas
Madrid, Spain
T +34 91 480 50 00

indracompany.com

