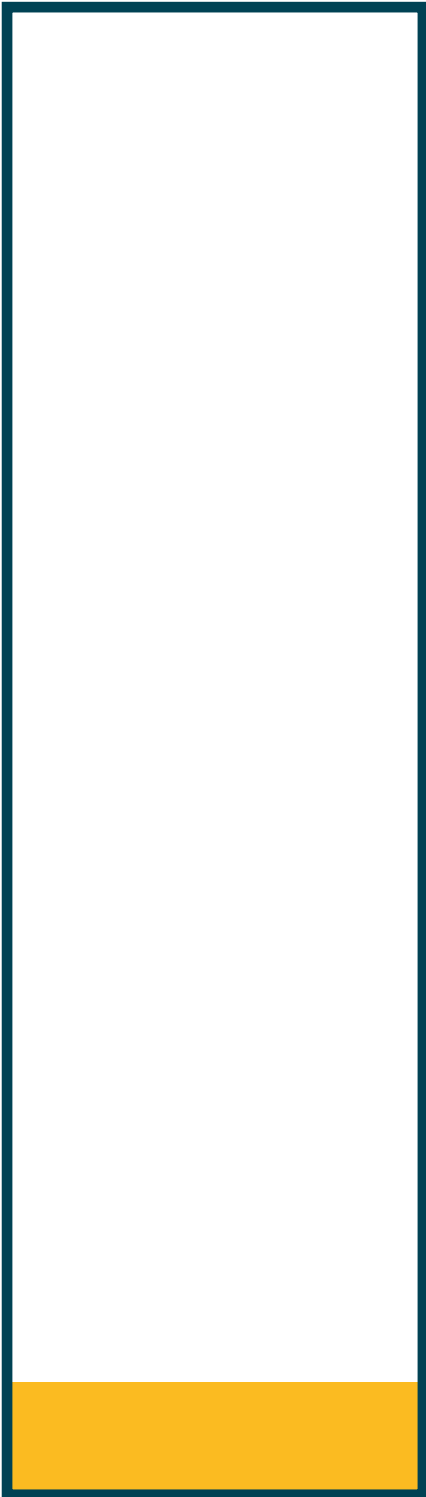


indra



Sustainability

Sustainability Policy

Date	Edit/Rev.	Reason for change
February 2024	4	Update
March 2022	3	Update
March 2020	2	Update
December 2015	1	First version

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Introduction

As part of its ongoing commitment to ethics and sustainable development, as well as to the different requirements of its stakeholders, Indra's Board of Directors has approved the following Sustainability Policy on 23 March 2020, which has been updated by the Board of Directors on 27 February 2024.

This Policy establishes the basic principles and the general framework of action for management of sustainability practices assumed by Indra and serves as the basis for the integration of it into Indra's business model and strategy.

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

1. Our commitment

As a technology company, our gaze is permanently fixed on the future so we may anticipate the needs of the communities where we are present.

At this moment in history, one of humanity's greatest challenges is to make development sustainable, fair, and inclusive, working toward the achievement of the UN Sustainable Development Goals, which inspire this Policy. Now, more than ever, improving the world means making it more sustainable.

Technology is a fundamental tool to transform the world: our commitment is to contribute to sustainable development through technology.

At Indra, we have taken on the challenge of designing and implementing of technologies that help solve our societies' social and environmental challenges.

These include the fight against climate change, improvement of people's security, health and well-being, reduction of inequalities, development of sustainable cities and communities, and promotion of global peace and justice, among others.

To achieve this, we are committed to the development of technologies that place people at the center, respect their rights and the environment.

At Indra we firmly believe that the development of innovative technology rooted in sustainability creates long-term value for our shareholders, customers, employees and, in a broader sense, for all of society and for the communities where we operate.

2. Scope of Application

This Policy is applicable and mandatory for all companies in the Indra group on a global scale and is extended to suppliers and business partners through the Sustainability Policy for Suppliers.

3. Principles of Action

The Sustainability Policy is the guide for effective integration of environmental, social, and good governance (ESG) priorities into the company's decision-making process, development of products and services, and in its relationships with the company's main stakeholders.

To this end, the Policy includes the following principles of action:

1. Governance Model for a Responsible Business

- Promote and maintain mechanisms to ensure identification, analysis and adoption of best practices, principles, and recommendations in the field of corporate governance, both national and international.
- Maintain appropriate balance, distribution of power and diversity in the structure and composition of the Board of Directors by adopting the means necessary to allow it to act with unity of purpose and independent judgment, pursuing corporate and shareholder interests as well as sustainability for the group.
- Comply with applicable law at all times in all the territories in which Indra is present, as well as comply with foreign and domestic commitments signed by the company in the environmental, societal, and corporate governance fields. These include commitments under the Code of Ethics and Legal Compliance and under the Principles of the United Nations Global Compact.
- Respect the Human Rights recognized in the United Nations International Charter of Human Rights and the Universal Declaration of Human Rights, as well as in the ILO Declaration on Fundamental Principles and Rights at Work, in their Conventions, and in the Guiding Principles on Business and Human Rights.
- Ensure the application of good tax practices in the communities where the company is present.
- Ensure that trade and export of technology is conducted in accordance with the company's ethical standards of conduct and in compliance with applicable law.

2. Enhancing Technology while Impacting Sustainable Development

- Promote innovation and investment in the products and services which Indra offers that support sustainable development, with solutions that allow our clients to contribute to the well-being of people and society in general, to better manage our natural resources and fight against climate change.
- Incorporate sustainability criteria into the design and development of our products and services from the outset.
- Measure the company's social and environmental impact, as well as its contribution to social progress.

3. Combating Climate Change and Protecting the Environment

- Assume a commitment to the fight against climate change and to the reduction of the carbon footprint in the company's operations and premises in line with the agreements established in the United Nations Framework Convention on Climate Change, the European Union, and/or the governments of those countries in which Indra operates.
- Minimize the environmental impact of the company's operations and premises as well as of the solutions and services it offers to its customers.
- Incorporate circular economy principles by promoting a rational use of resources and responsible management of waste and end-of-life products.

4. Relationships with Stakeholders

- Maintain responsible, fluid, and two-way communication with the company's stakeholders: shareholders, investors, clients, employees, authorities, regulators, union representatives, suppliers, partners, knowledge institutions, entrepreneurship ecosystem, foundations, local communities, and Society as a whole.
- Publish relevant financial and non-financial information in a manner consistent with our commitment to transparency, integrity, and completeness so that stakeholders can make informed decisions about Indra, as specified in the Code of Ethics and Legal Compliance.
- Publish the commitments Indra has made to sustainability, its monitoring and evaluation through reports in commonly accepted methodologies and submit this information for independent external verification.
- Promote the integration of social and environmental criteria in commercial, labour, or other relations with our main stakeholders.
- Promote the awareness and sensitisation of stakeholders in sustainability matters, so that they become allies of the company in order to jointly contribute to the sustainable development of communities.

Through this Policy, Indra is committed to applying an approach of continuous improvement in its sustainability management which, through the periodic review and establishment of objectives in each of the company's areas of activity, allows to progressively and constantly mitigate the most relevant risks and impacts in terms of sustainability, as well as take advantage of the opportunities offered by the environment, making a positive contribution to sustainable development.

4. Commitments to our Stakeholders

1. Commitment to Employees

- Facilitate a work environment that promotes integration and development of all employees, respect, resistance against all discrimination, promotion of diversity, and equal opportunity through measures that promote work/life balance and integration of groups at risk of exclusion.
- Create open, dynamic, and flexible work environments that foster creativity and innovation as one of the pillars of the company's business model and strategy.
- Promote employee job stability by contributing to their financial well-being.
- Promote the safety, health, and well-being of all company employees and in particular in those aspects that may have a high impact in the sector.
- Promote and expand channels of communication between the company and its employees.
- Ensure employees' rights to social dialogue and collective bargaining.
- Ensure that, through dissemination and training actions, employees have the necessary skills and knowledge to apply the company's sustainability policies and management systems, and thus contribute to the achievement of Indra's ESG objectives.

2. Commitment to Clients

- Develop products and services that help our customers become more sustainable in their actions.
- Ensure safety, compliance with applicable regulations, and highest quality standards for Indra products and services.
- Conduct responsible project management aimed at improving customer satisfaction and identifying, evaluating, and responding to their needs with sustainability criteria.
- Promote and expand communication channels, allowing customers to communicate with the company regarding possible incidents or any aspect related to Indra products or services.

- Ensure the confidentiality of client data in accordance with the provisions of the Indra Code of Ethics and Legal Compliance.

3. Commitment to Shareholders and Investors

- Ensure the rights of shareholders through transparency of information, raising of proposals, access and voting at Annual Shareholders' Meetings, among others.
- Maintain governing bodies in a way that ensures their independence and professionalism and represents the interests of all shareholders.
- Have governing bodies with the diversity needed to eliminate possible biases in decision-making.

4. Commitment to Suppliers and Partners

- Integrate the principles of responsibility and sustainability in supply chain management, extending the commitments contained in this Policy and the principles and values embodied in the Code of Ethics and Legal Compliance to company suppliers.
- Maintain the highest standards of respect for Human Rights as regards to material sourcing for its products and, in particular, conflict materials.
- Ensure fair and impartial treatment of suppliers and seek, where possible, promotion of economic development in the communities where Indra is present through the hiring of local suppliers.
- Apply due diligence processes in establishing third party relationships to ensure that they are aligned with the commitments contained in this Policy and in the Sustainability Policy for Suppliers.

5. Commitment to Governments and public decision-makers

- Ensure the strictest legal compliance in all company activities and in the relationship with third parties.
- Maintain a transparency policy in the relationship with governments and public decision-makers.
- Provide expert vision in those areas of technical regulation in which governments and public decision-makers may require support, either directly or indirectly through sectoral or business associations.
- Not supporting proposals that may go against the general interest of society or local communities.

6. Commitment to Universities, Research Centers, and the entrepreneurship ecosystem

- Offer opportunities to exchange and develop knowledge for the benefit not only of the company itself, but also of society in general.
- Be allies in improving the skills of young people in local communities and offering fair employability alternatives.
- Promote technological vocations (STEM¹) and digital skills in collaboration with knowledge institutions and other organizations.

7. Commitment to foundations and Society in general and contribution to the sustainable development of local communities

- Promote social action initiatives that support the development of a more inclusive and sustainable society through technology and innovation, with a particular focus on people with disabilities and the social, environmental and climate change challenges faced by local communities.
- Promoting employee participation in volunteer initiatives in these areas.
- Create employment and local economic activity in the communities in which the company operates.

5. Relationship with other Policies

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

In this way, this Sustainability Policy is complemented by other internal regulations of Indra, in particular:

- Code of Ethics and Legal Compliance
- Criminal Risk Prevention Manual
- Antitrust Law Risk Prevention Manual
- Policy on Control and Management of Risk
- Risk Management Manual and Procedures
- Indra Project Management Method and Project Risk Management Method
- Policies and Procedures for Business Continuity and Information Security
- Rules on Donations and Sponsorships
- Membership and Contributions to Foundations, Associations, or other similar entities
- Human Rights Policy and Modern Slavery Statement
- Human Resources Policies
- Diversity Policy

¹ STEM: Science, Technology, Engineering and Mathematics.

- Occupational Risk Management System Prevention Program
- Compensation Policy for Directors
- Communication Policy for Shareholders, Institutional Investors, and Proxy Advisors
- Environmental Policy
- Position on Climate Change
- Energy Policy
- Statement on Conflict Minerals
- Procurement Policies and Procedures
- Sustainability Policy for Suppliers
- Tax Policy
- Payment Instruments Policy

It is expected that entities within the group use this Policy as a basis for developing their own rules, without prejudice to any adaptations arising from, among other reasons, compliance with local regulations and recommendations or requirements made by the agencies that regulate them.

6. Communication with Stakeholders

Indra keeps various channels of communication, participation, and dialogue, which are continuously reviewed and updated, available to its stakeholders.

Main external channels	Main internal channels
<ul style="list-style-type: none"> ▪ Corporate websites: www.indracompany.com and www.minsait.com ▪ Corporate employment website www.indraempleo.com ▪ Corporate Reports ▪ Sustainability Report (Non-Financial Statement) ▪ Quarterly reports ▪ Shareholder's Office ▪ Direct Channel ▪ Supplier Portal ▪ Press releases ▪ Social and professional networks ▪ Business microsites ▪ Satisfaction surveys ▪ Meetings and conferences ▪ Online newsletters and engagement platforms ▪ Phones and mailboxes 	<ul style="list-style-type: none"> ▪ Corporate intranet ▪ Communications with employees ▪ Professional networks ▪ Meetings and conferences ▪ Opinion polls ▪ Training activities

7. Governance and Oversight Model

In accordance with current law, the Board of Directors has the non-delegable power to approve the Sustainability Policy, relying upon the Sustainability Committee for its review, updating and oversight.

The Sustainability Policy serves as a framework for action for other set of policies related to the company's social and environmental management, which are therefore subject to the same monitoring process described in this document. These policies include the Human Rights Policy, the Modern Slavery Statement, the Sustainability Policy for Suppliers, the Environmental Policy, and the Energy Policy.

For Indra, the development of a sustainable business model and the principles of action that comprise it implies that they are part of the processes and objectives of the different business areas and inform the decision-making of the company's governing and management bodies.

The Strategy Department is responsible of implementing the company's sustainability strategy, executing the Sustainability Master Plan, and establishing oversight, control, and reporting mechanisms in these areas, reporting to the Sustainability Committee.

The Sustainability Master Plan is updated periodically and reflects the specific sustainability objectives and initiatives that the company puts forth to meet the commitments set out in this Policy. The design of the Sustainability Master Plan is based on the company's Materiality Analysis, and considers the company's risk map, the evolving stakeholder expectations, the company's strategy, and applicable law.

Indra monitors compliance with the Sustainability Master Plan annually, with the results reported through the Sustainability Report (Non-Financial Report). This report is drafted by the Board of Directors, is part of the Management Report, and is submitted for approval at the Annual Shareholders' Meeting as a separate item on the agenda.

Indra's Global Risk Management Department performs its risk management and control function under the direct supervision of the Audit and Compliance Committee.

Regarding the identification and management of non-financial risks, the Audit and Compliance Committee is supported by the Sustainability Committee.

Both committees report regularly to the Board of Directors, which is ultimately responsible for determining risk control and management policy and overseeing internal information and control systems.

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At the core