Third-Party Sustainability Overview Report 2024

INDRA GROUP

Contents

Our 2024 performance in figures

Financial performance

Revenues (M€)	EBIT Margin	Free Cash-Flow (M€)	Net debt / EBITDA
4.843	9%	328	-0,2x

Governance, ethics and transparency

Employees trained in ethics, competence and anti-corruption	98%
Of suppliers accepted the Indra Group`s Code of Ethics	100%
Nº of cybersecurity incidents with critical impact	0

Technology with impact

R&D investment over revenue (fiscal approach)	8,9%
Professionals dedicated to R&D	+4k
Women on R&D activities	29%

Nº3 worldwide in sustainability for the IT Services sector according to S&P Global CSA in 2024, Nº1 in 2021, 2022 y 2023

S&P Dow Jones Indices
A Division of S&P Global

SCIENCE BASED TARGETS
DRIVING AMBITIOUS CORPORATE CLIMATE ACTION

BUSINESS AMBITION FOR 1.5°C

Planet

1.5°C emission reduction objectives validated by SBTi

13%	92%	2030	2040 ← 2050
Emission reduction vs. 2019	Green energy	-55% emissions by energy consumption	100% carbon neutral — Net zero target brought forward by a decade

People

60,907
Group staff

Diversity

32%	2,5%
Women on staff	Gender gap

Labor conditions

95%	92%
Full-time staff	Professionals with fixed contract

Clients

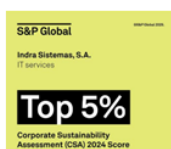| 38	83%
Net Promoter Score	Customer Satisfaction Score

Top Employer company in Spain 2024

Among the leaders in sustainability

Top 5%	Member	Top 1%	A list	Low ESG Risk
CSA S&P Global 87/100 points Top 5%	Ftse4Good 3,9/5 points Top 11%	EcoVadis 82/100 points	CDP Climate Change (F-A scales)	ESG Risk 11,8 in 0-100 scale

Main inputs

Human capital
- ✓ ~61.000 professionals
- ✓ 32% women, +100 nationalities
- ✓ Recognized as Top Employer

Technological capabilities
- ✓ 1st Spanish company and 2nd European in the H2020
- ✓ +4.100 professionals in R&D
- ✓ Technological benchmark in key sectors

Financial resources
- ✓ 427 M€ € in R&D (fiscal approach)
- ✓ 328 M€ Free Cash Flow
- ✓ ~1.700 M€ in purchases of products and services

Geographical scope
- ✓ Local presence in +50 countries
- ✓ Commercial activity in +140 countries
- ✓ 97% local professionals

Partners and alliance
- ✓ +7.000 suppliers
- ✓ +1000 collaborations with research centers and universities
- ✓ ~ 1 M€ investment in social action

Natural resources
- ✓ ~153 K GJ energy consumed
- ✓ 92% renewable energy at global level

Value creation

Value proposition

- Comprehensive offering of proprietary products with an end-to-end approach
- High degree of specialization and sectorial knowledge
- Offer with a high component of technological innovation
- Capabilities for the integration of the physical and digital world
- Sustainable technology for all sectors of the economy
- Development of projects all over the world

Business model: technology for the core operations of our clients all over the world

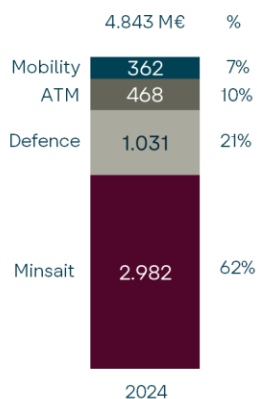World leader of proprietary solutions in specific segments of the **Transport and Defence markets**

- ✈ ATM
- 🚆 Mobility
- 🌐 Defence

	4.843 M€	%
Mobility	362	7%
ATM	468	10%
Defence	1.031	21%
Minsait	2.982	62%

2024

Digital Transformation and TI (Minsait)

Leading **digital transformation and IT consultancy in Spain** and **Latin America**

- Public Administration
- Industry & Consumption
- Energy
- Telco & Media
- Financial Services

Impact

Employees
- 94% professionals with permanent contract
- 2,5% gender gap
- ~14k k new hires, 31% women
- Training for all professionals

Planet And Climate Change
- Net-zero target validated by the SBTi
- 70% scope 1 and 2 emissions reduction and -42% scope 3 in 2024 vs 2019
- ~ 90% ISO 14001 centres (+500 seats)
- 94% hazardous waste recycled/recovered

Clients and partners
- ~50% of sales outside Spain
- 0 cybersecurity incidents with critical impact
- 90% suppliers evaluated with ESG criteria

Local communities
- Contribution to the UN SDGs and to the 2030 Agenda trough the offering
- 73% purchases from local providers
- +12k direct beneficiaries of initiatives with local communities

Shareholders and investors
- 278 M€ net benefit
- 5,3% revenues aligned with the EU Climate Taxonomy

SDG icons: 5 Gender Equality | 8 Decent Work and Economic Growth | 10 Reduced Inequalities | 7 Affordable and Clean Energy | 12 Responsible Consumption and Production | 13 Climate Action | 8 Decent Work and Economic Growth | 9 Industry, Innovation and Infrastructure | 16 Peace, Justice and Strong Institutions | 8 Decent Work and Economic Growth | 10 Reduced Inequalities | 13 Climate Action | 8 Decent Work and Economic Growth | 16 Peace, Justice and Strong Institutions | 17 Partnerships for the Goals

1 About this report

Indra Group has the commitment to publish relevant sustainability information in a manner consistent with our commitment to transparency, integrity, and completeness so that stakeholders can make informed decisions about Indra Group, as specified in the Group's **Sustainability Policy** and the **Code of Ethics and Legal Compliance**.

Therefore, the **Third-Party Sustainability Overview Report 2024** provides a visual overview of the Group's strategy and performance in certain sustainability matters in the 2024 financial year even though these matters are not considered material in the Indra Group's double materiality assessment.

In consequence, material sustainability matters included in this report are based on the **2024 Consolidated Non-Financial Information Statement and Sustainability Information for Indra Sistemas, S.A. and its subsidiaries** (henceforth the 2024 Sustainability Report). The 2024 Sustainability Report has been prepared in accordance with the Corporate Sustainability Reporting Directive or CSRD[1] and the European Sustainability Reporting Standards (ESRS)[2] and also complies with the requirements in matters of non-financial information[3]. The Sustainability Report has been verified by an independent entity, refer to the 2024 Sustainability Report chapter independent verification report for more information.

This Report encompasses additional sustainability matters that were not addressed in the 2024 Sustainability Report. These matters may be deemed non-material for the Indra Group or not fall under the purview of the regulations that inform the preparation of the Sustainability Report. The Group has consistently sought to reinforce this content by referring to public information, including policies and other Indra Group reports, which are available for consultation on the Group's website and Sustainability website.

For more information on the Indra Group's sustainability matters, refer to the 2024 Sustainability Report. Should any discrepancy be found between this report and the 2024 Sustainability Report in its Spanish version, please refer to the Spanish version.

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[1] Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU, as regards corporate sustainability reporting.
2 Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards sustainability reporting standards.
3 Act 11/2018, amending the Spanish Code of Commerce; the consolidated text of the Spanish Companies Act, approved by Royal Legislative Decree 1 of 2 July 2010 and the Act on Auditing Accounts in matters of non-financial information and diversity.

2 Business model and sustainability

Indra Group is a holding company that **drives technological progress**, operating in the fields of Defence, Air Traffic and Mobility (under the Indra brand) and Information Technology (under the Minsait brand), and is recognised throughout Spain and Latin America for its expertise in digital transformation and information technology. The Indra Group leverages groundbreaking solutions, long-term relationships and the finest talent to build towards a more secure, better-connected future. However, sustainability also forms a fundamental part of its corporate purpose, with the Group actively driving the sustainability of its customers through technology.

In line with this vision, the Indra Group's structure is divided into **four business divisions** that all share a technological base: Defence, Air Traffic, Mobility and Minsait. While technology lies at the heart of each area's business model, the areas themselves present very different business dynamics.

> Indra Group is one of the leading international technology and consultancy companies, accruing global sales of €4.838 million in 2024
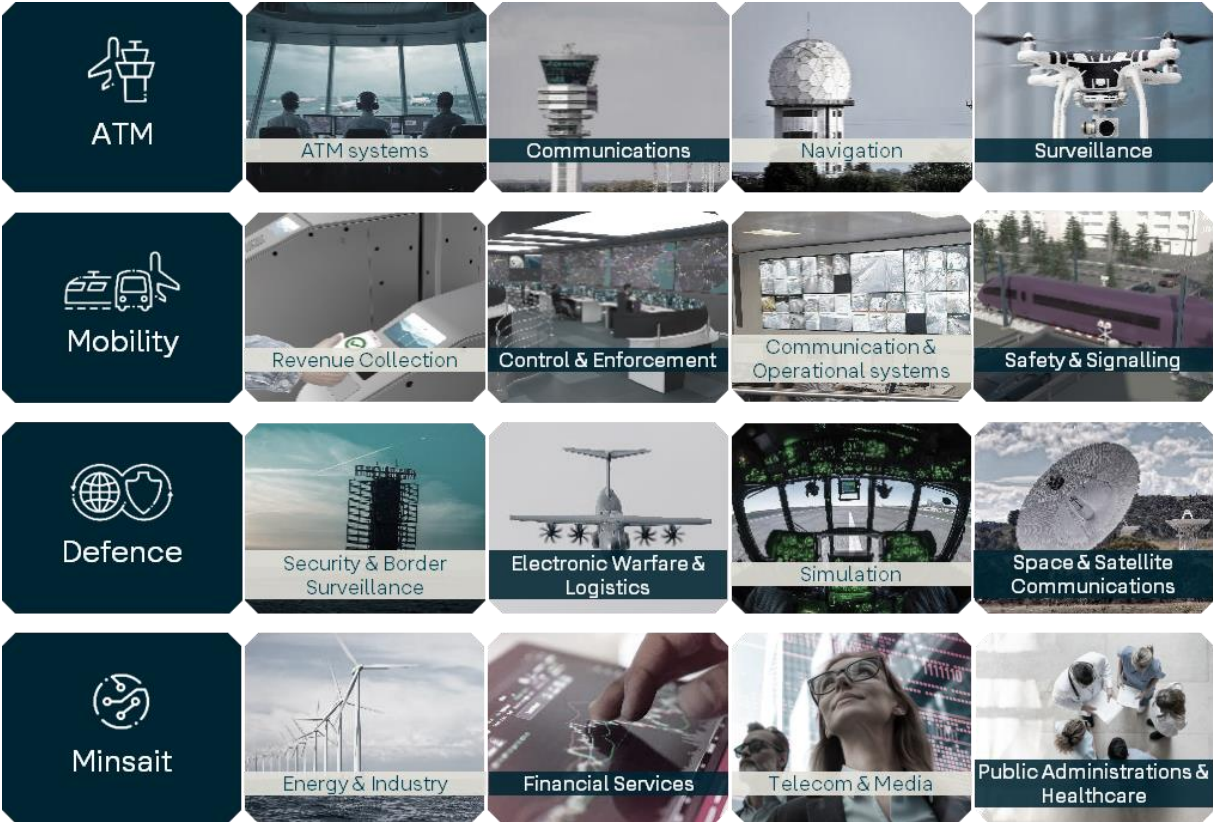
Refer to 2024 Sustainability Report chapter 1.8 SBM-1. Strategy, business model and value chain for comprehensive details on the Indra Group's business model.

Indra Group's international presence

Indra Group **operates locally in over 50 countries**, across which its more than **60,000 employees** are based. In addition, its business **activities spread across more than 140 countries**, meaning that the reach of Indra Group's commitment to sustainable development is virtually global.

The Indra Group is headquartered in Spain, although it also has a major presence in Latin America and Europe. The majority of the Indra Group's employees work in these three geographies.

Leading the Future Strategic Plan

In February 2024, the Board of Directors approved the 2024–2026 Leading the Future Strategic Plan. This Plan has two time horizons, a medium-term vision (up to 2026) and a long-term aspiration (up to 2030).

The Leading the Future Strategic Plan is aimed at positioning Indra Group as the leading Spanish multinational working in aerospace, defence and advanced digital technologies. The plan sets out the following guidelines:

- Fast-track the transition to becoming the **national multi-domain leader in defence**, with the aim of gaining greater prominence as an integrator of global systems and coordinator of the Spanish ecosystem in air and ground programmes, while developing the space domain. The Indra Group has created its new subsidiary Indra Space with this last goal in mind.

- Transform Indra Group into the **global leader in air traffic management** (ATM), upscaling its operations in North America and Asia Pacific.

- Transform the Indra Group into the coordinator of the **advanced technologies** and **digital services ecosystem** in Europe and Latin America, driving the development of the most advanced digital technologies in fields such as artificial intelligence, the cloud and cybersecurity.

- Strengthen Indra Group brands to secure its position as an employer of choice for high-value tech talent in the target regions.

For more information on the Indra Group's business model, the markets in which it operates and its strategy, we recommend reading the investor presentation available and regularly updated on the Indra Group's corporate website.

2.1 Sustainability model

As part of its ongoing commitment to sustainable development and ethics, as well as to the various requirements of its stakeholders, Indra Group has a Sustainability Policy in place that was last updated and approved by its Board of Directors in February 2024.

Indra Groups's Sustainability Policy was developed based on the Sustainable Development Goals of the UN 2030 Agenda and adopts leading international standards in order to respond to stakeholder expectations.

The Sustainability Policy is the reference framework for managing the sustainability practices undertaken by the Indra Group, serves as the basis for integrating them into its business model and strategy, and ensures the effective integration of environmental, social and governance (ESG) criteria in the Group's decision-making processes, in the development of its products and services, and in relation to the Group's main stakeholders.

Under its Sustainability Policy, the Indra Group undertakes to approach sustainability management in a spirit of ongoing improvement. By reviewing and periodically setting targets in each of the Group's spheres of activity, the most relevant sustainability-related risks and impacts can be mitigated gradually and continuously, while also pursuing any opportunities offered by the environment in terms of a positive contribution to sustainable development.

The Sustainability Policy is applicable to and binding on all Indra Group companies worldwide and it extends to the Group's suppliers and business partners under the terms of the Sustainability Policy with Suppliers.

Principles of action of the Sustainability Policy

Strength the governance model for responsible business
- ✓ Adopt best practices in corporate governance
- ✓ Pursue the social interest and sustainability of the group
- ✓ Comply with the Code of Ethics and respect Human Rights

Strength the governance model for responsible business
- ✓ Promote business offerings with impact on sustainability
- ✓ Include social criteria in the development of products and services
- ✓ Measure the impact of business offerings on people and the planet

Combat Climate Change and protect the environment
- ✓ Fight Climate Change
- ✓ Minimize the environmental impact of operations
- ✓ Rational use of resources

Reinforce relationship with stakeholders
- ✓ Fluency and transparency in Communications, sharing relevant information for decision making
- ✓ Dissemination, follow-up and evaluation of the commitments acquired

The **Sustainability Committee** is responsible for monitoring and supervising the objectives and principles of this policy and for reporting its conclusions to the Board of Directors.

By applying this policy, the Indra Group undertakes to comply with the UN's International Bill of Human Rights, the Universal Declaration of Human Rights, the Principles of the UN's Global Compact, the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, as well as its conventions and Guiding Principles on Business and Human Rights.

Indra Group's sustainability model is inspired by the **Sustainable Development Goals** (SDGs). For many years, the Group's business strategy has been deeply committed to contributing towards the objectives of the UN 2030 Agenda, a commitment that is evident from the initiatives launched as part of its 2024-26 ESG Plan approved by the Board of Directors in 2024, which is the successor plan of the 2020-2023 Sustainability Master Plan.
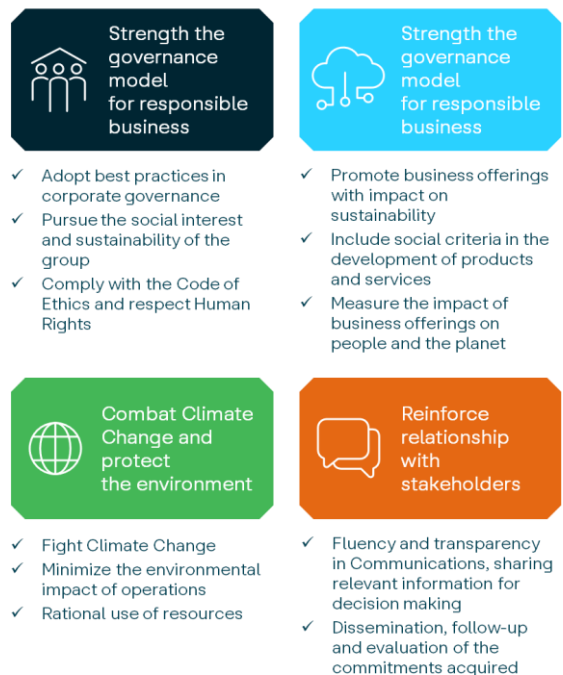
> Indra Group's suite of solutions and services helps towards achieving the UN's Sustainable Development Goals

Indra Group has taken on the task of designing and implementing technologies that will help to resolve the social and environmental challenges currently faced by our society. To do this, the Group is committed to developing people-centric technologies, which respect the rights of individuals and the environment. Indra Group's activity thus contributes to almost all the SDGs.

2024-2026 ESG Strategic Plan

The Indra Group keeps working to cement its position as a leader in the sustainability market in line with the guidelines of the new Sustainability Master Plan (the **2024–2026 ESG Plan**), integrated within the Strategic Plan, which sets out the following commitments:

- Accelerate the decarbonisation roadmap
- Set eco-design requirements for all new products.
- Enhance role of governing bodies in overseeing ESG risk.
- Incorporate best practices for the responsible use of artificial intelligence and data privacy in the Group's solutions.
- Increase the percentage of women holding management and middle management positions.
- Improve the sustainability of the Group's supply chain.

The 2024–2026 ESG Plan sets out the Indra Group's specific sustainability goals and the initiatives rolled out to meet the commitments outlined in its Sustainability Policy. The Plan was **based on the Indra Group's materiality assessment** and revolves around four courses of action, guiding the sustainable development material matters and setting in place a framework to foster a culture of sustainability at the Group.

Indra Group's 2024–2026 ESG Plan has a global approach and scope, and seeks to address all of its activities, value chain stages, geographical areas and stakeholders, with the exception of those targets for which a particular geography is specified. The ESG Plan has a three-year time horizon (2024 to 2026). Milestones have been established for the courses of action under the plan, most of which are expected to be reached in 2026.

Refer to 2024 Sustainability Report chapter 1.8 SBM-1. Strategy, business model and value chain and chapter 1.10. SBM-3. Material impacts, risks and opportunities and their interaction with the strategy and business model for comprehensive details on the Indra Group's sustainability model.

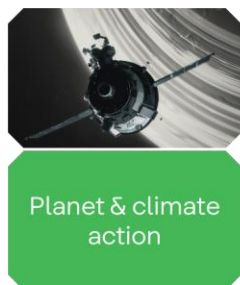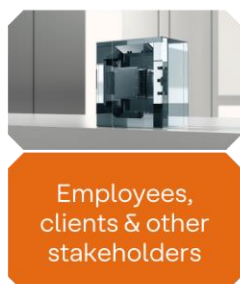| 2024-26 Strategic Plan pillars	Sustainability objectives	KPIs	Related SDGs
Governance & business integrity Acting with integrity and transparency	• Promote ethical behavior by professionals and ensure respect for human rights in all the Group's activities • Structure, agenda and functioning of governance bodies following best practices • Promote the selection of suppliers aligned with ESG priorities • Integrate ESG objectives at the highest level and improve traceability and transparency of information	• Sustainability Report successfully adapted to the CSRD Directive • 90% of professionals trained in ethics and anti-corruption • Human Rights Due Diligence adapted to the CSDDD Directive • 100% of critical suppliers with ESG assessment by 2026 • 20% of critical suppliers trained in Sustainability by 2026	8 DECENT WORK AND ECONOMIC GROWTH 10 REDUCED INEQUALITIES 16 PEACE, JUSTICE AND STRONG INSTITUTIONS
Planet & climate action Contributing positively to the planet	• To be carbon neutral in our own operations by 2030 and Net Zero throughout the value chain by 2040 • Reduce energy consumption at workplaces • Recycle electrical and electronic waste, promoting circular economy • Maximize efficiency in the Group's technological infrastructures with green IT strategies.	• Net Zero target approved by SBTi • Emissions reduction 2026 vs 2019: -75% scope 1+2 in absolute value (tonCO2) and -45% scope 3 purchases from suppliers (tonCO2/€ revenue) • 90% global green energy by 2026 • Recycling of electrical and electronic waste in Spain > 90%	7 AFFORDABLE AND CLEAN ENERGY 6 CLEAN WATER AND SANITATION 13 CLIMATE ACTION
Responsible products & services Pioneering responsible products and services	• Protect operations from the threats and risks of the digital world: cybersecurity and privacy • Adopt eco-design criteria for all new products • Ensure ethical and sustainable use of AI • Amplify the positive impact of Indra's products and services with a special focus on Defense.	• Implementation of the Information Security Plan '24-'26 • 100% of design and product development engineers trained in eco-design by 2025 • Adopt eco-design criteria in 100% of new HW products designed from 2026 onwards • Responsible Use of AI policy and supplier training	5 GENDER EQUALITY 8 DECENT WORK AND ECONOMIC GROWTH 17 PARTNERSHIPS FOR THE GOALS
Employees, clients & other stakeholders Attracting STEM talent and improving customer satisfaction	• Improve employee satisfaction and promote their physical and emotional well-being with a focus on mental health • Promote diversity as a value in the teams with a special focus on gender • Improve customer satisfaction and communication and feedback channels • Strengthen dialogue with stakeholders including analysts, shareholders and industry associations.	• Improve professional satisfaction levels by 2026 vs. 2023 • 23% women at senior management level and 30% at management level by 2026 • Wage gap in worst performing geographies, max. +3p.p. vs. global by 2026 • 80% of workforce in main geographies with ISO 45001 health and safety certification by 2026	9 INDUSTRY, INNOVATION AND INFRASTRUCTURE 11 SUSTAINABLE CITIES AND COMMUNITIES 12 RESPONSIBLE CONSUMPTION AND PRODUCTION

The main actions of the 2024–2026 ESG Plan taken in 2024

Governance & business integrity

- Sustainability Report has been prepared in line with the ESRS and verified by an external auditor
- ISO 37001 renewed in Italy, Spain, Brazil, Peru and Colombia
- Board approval of ESG targets for senior management remuneration, both in terms of the annual variable remuneration target (2024) and the medium-term target for 2024–2026
- 45% of critical suppliers with a complete ESG score in accordance with the CSRD
- 10% of critical suppliers trained in sustainability via the Global Compact

Planet & climate action

- Presented emission reduction plan to the SBTi
- -13% reduction in emissions vs. 2019
- 100% green energy in Italy
- 92% green energy at the global level
- 2 new sites certified under the ISO 50001 energy efficiency standard
- 51 SMEs trained in how to calculate their carbon footprint, with 115 successfully reporting it

Responsible products & services

- Roll-out of nine initiatives focused on the areas posing the greatest risk
- 77.6% of product design and development engineers trained in eco-design
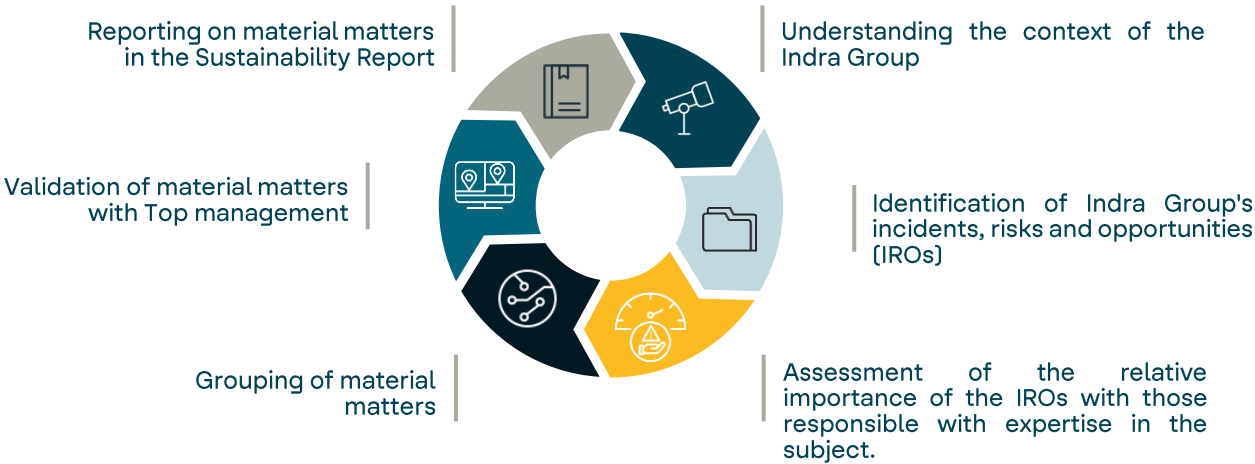
Employees, clients & other stakeholders

- Quarterly monitoring of employee turnover, with a benchmark figure of 8.9% for Minsait España.
- Broadening of the current scope of ISO 45001 with another two certified companies in Spain.
- The Indra Group has organized webinars, workshops and activities focusing on physical and emotional well-being and mental health, while sharing short information features and master classes on digital detox, nutrition and female health.
- Customer survey based on the new model.

2.2 Double materiality assessment

Indra Group updates its **double materiality assessment** every year to identify the material ESG-related matters and concerns of the organisation and its stakeholders.

"Double materiality" takes account of the way in which business activities can affect the environment and society, as well as how environmental, social and governance factors can impact the Group itself, its financial performance and its long-term strategy.

Indra Group has based its double materiality assessment process on the EFRAG guidance, observing the provisions set out in the ESRS.

Reporting on material matters in the Sustainability Report

Validation of material matters with Top management

Grouping of material matters

Understanding the context of the Indra Group

Identification of Indra Group's incidents, risks and opportunities (IROs)

Assessment of the relative importance of the IROs with those responsible with expertise in the subject.

As a result of its materiality assessment, Indra Group identified the following topics as important.

ESG Plan '24-'26	Impact materiality	Financial materiality
Responsible sourcing	X	X
Employee experience and well-being	X	X
Cybersecurity and privacy by design	X	X
Net Zero emissions	X	X
Responsible products & services (I+D)	X	X
Ethics, anti-corruption and Human Rights	X	X
Circular economy	X	
Diversity and inclusion	X	X
Eco-design	X	
Customer satisfaction	X	X
Stakeholder engagement	X	X
Accountability and transparency	X	X
Corporate governance	X	
Social impact	X	

Legend:
ESG Plan '24-'26 pillars

Governance & business integrity	Responsible products & services
Planet & climate action	Employees, clients & other stakeholders

Note: ESG Plan topics have been represented in the matrix based on the aggregate score of the material IROs in each category and adjusting the weight of Information Security and Ethics for their criticality.

Indra Group has established policies, action plans, objectives and metrics for each material issue, enabling integration into the overall management of the Indra Group. The report is divided into different sections, organized according to these material topics.

Topics Plan ESG	
Responsible sourcing	Promote the selection of suppliers aligned with ESG priorities.
Ethics, anti-corruption and Human Rights	Promote ethical behaviour by professionals and ensure respect for human rights in all the Group's activities.
Accountability and transparency	Integrate ESG objectives at the highest level and improve traceability and transparency of information.
Corporate governance	Structure, agenda and functioning of governance bodies following best practices.
Cybersecurity and privacy by design	Protect operations from the threats and risks of the digital world: cybersecurity and privacy.
Responsible products & services	Ensure ethical and sustainable use and contribute to progress and society challenges through innovative technological solutions.
Eco-design	Adopt eco-design criteria for all new products.
Social impact	Amplify the positive impact of Indra's products and services with a special focus on Defence.
Circular economy	Promoting circular economy by recycle electrical and electronic waste and adopt eco-design.
Net Zero emissions	To be carbon neutral in our own operations by 2030 and Net Zero throughout the value chain by 2040 and reduce energy consumption at workplaces.

Topics Plan ESG	
Employee experience and well-being	Improve employee satisfaction through employee experience, training and professional development and promote their physical and emotional well-being with a focus on mental health
Diversity and inclusion	Promote diversity as a value in the teams with a special focus on gender
Stakeholder engagement	Promote diversity as a value in the teams with a special focus on gender
Customer satisfaction	Improve customer satisfaction and communication and feedback channels

The results presented in this Report are a summary of the double materiality analysis, which has been aggregated on the basis of the Indra Group's ESG Plan 2024-2026.

Refer to 2024 Sustainability Report chapter 1.10. SBM-3. Material impacts, risks and opportunities and their interaction with the strategy and business model and chapter 1.11. IRO-1. Description of the process to identify and assess material impacts, risks and opportunities for comprehensive details on the full methodology and the results of the materiality analysis based on impacts, risks and opportunities.

3 Governance

3.1 Corporate Governance

Governance model

The existence of an effective, transparent and structured Corporate Governance system geared towards the management of Indra Group's operations is essential to guarantee its success via sustainable and orderly growth.

The **Governance Model** is solidly structured upon its principles, internal regulations, codes and corporate policies. Together, this constitutes an overall guide to ensure that all the aspects related to the business are properly addressed, in accordance with the national and international regulations, standards and best practices in matters of Corporate Governance. The internal regulations and the main corporate policies are available on the company website.

The principles of Indra Group's Corporate Governance Model are:

- **Efficiency:** to guarantee the most suitable composition of the administrative body and apply measures that allow it to act with purpose and independence in the interests of protecting social welfare, the shareholders and guaranteeing Indra Group's sustainability.

- **Fairness:** to encourage dialogue with shareholders, investors and other stakeholders and equal treatment of all parties.

- **Respect for shareholders' rights:** to implement measures to promote informed shareholder participation and the exercise of their rights.

- **Responsible compliance by management:** active supervision with specific and non-delegable responsibilities.

- **Transparency:** both in informative terms and regarding the commitment to dialogue with all stakeholders.

The **Sustainability Policy** reflects the Group's commitments to all its stakeholders and represents a reference framework to guarantee responsible behaviour in all of its activities and business relationships.

> Indra Group reviews its internal regulations in order to adopt the best practices and recommendations in terms of Corporate Governance, as well as the main international benchmark standards

Indra Group complies very closely with the recommendations of the Code of Good Governance of Listed Companies, as set out in section G of the Annual Corporate Governance Report.

The Annual Corporate Governance Report, as well as the operating reports of the Auditing and Compliance Committee, the Appointments, Remuneration and Corporate Governance Committee and the Sustainability Committee, which are published when the Ordinary General Shareholders' Meeting is called, contain extensive information regarding the activity of Indra Group's governing bodies during the year, along with information regarding the Group's level of compliance with the recommendations in force regarding Corporate Governance.

Composition of the Board

The Director Selection Policy sets out the principles, criteria and basic prerequisites for the selection of directors. It incorporates the mandate given to the Board and the Appointments and Governance Committee to particularly ensure that Directors are selected in accordance with a policy that aims to promote an appropriate Board composition, as well as diversity of knowledge, experience, age, gender and culture, and that also aims to avoid biases that may lead to discrimination.

Indra Group believes that an appropriate representation of independent members[4] on its Board and Committees allows it to guarantee the protection of both shareholder and stakeholder interests, to allow for a better decision-making process and, in general, improve the Group's performance.

> No. non-executive directors on the Board of Directors
>
> **81%**
>
> No. of women as a percentage of total no. of independent directors
>
> **71%**

As a result, and as outlined in Article 8 of the Regulations of the Board of Directors, Indra Group's aim is that the proprietary and independent members comprise an ample majority of the members of its governing bodies, and the number of executive directors is kept to the necessary minimum.

The professional profiles of the members of the Board and its Committees, as well as those of the Management Committee, are public and always kept updated on the company website. The Board's skills matrix is also regularly updated to reflect the experience and knowledge that the Board of Directors should have. It is a key tool that facilitates an overview of the diversity of the Board's composition as a whole and that is used when making decisions on the planning and renewal of the Board's membership.

With regards to the composition of the **Committees of the Board of Directors**, it is worth noting that the Strategy, the Auditing and Compliance, the Appointments and Corporate Governance, the Remuneration and the Sustainability Committees have a majority of independent directors. Additionally, the Auditing and Compliance, the Appointments and Corporate Governance and the Sustainability Committees are chaired by female independent directors.

Notwithstanding the distribution of duties between of the Chair of the Board of Directors and the CEO, the Indra Group believes it to be good practice to have a lead independent director who can perform key duties with regard to coordinating the non-executive directors and acting as a spokesperson for their concerns, as well as providing a channel through which shareholders who are not directly represented on the Board of Directors can submit their concerns, demands and requests to the Board of Directors on matters of Corporate Governance.

At present, the positions of deputy chair of the Board of Directors and lead independent director are held by Virginia Arce.

Refer to 2024 Sustainability Report chapter 1.3. GOV-1. The role of the administrative, supervisory and management bodies and chapter 1.4. GOV-2 Information provided to and sustainability matters addressed by the Indra Group's administrative, management and supervisory bodies for comprehensive details on Indra Group's corporate governance.

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[4] Definition of the concept of an independent director. As a listed Spanish company, Indra Group is subject to various regulations. As regards the independence of board members, the Spanish Companies Act establishes a definition of this category of member in Article 529 clause twelve, under which 44% of Indra Group's Board comprises independent members.

Composition of the Board of Directors and its Committees

(no. of directors | % of total Council / Commission)

Board of Directors

Executives: 3 | 19%
- Ángel Escribano Ruiz - Executive Chair
- José Vicente de los Mozos – Chief Executive Officer
- Luis Abril* - Executive Director

Independent: 7 | 44%
- Virginia Arce - Vice-Chair / Coordinating Director
- Belén Amatriain
- Coloma Armero
- Francisco Javier García*
- Olga San Jacinto
- Ángeles Santamaría

Proprietary: 6 | 37%
- Jokin Aperribay
- Antonio Cuevas
- Javier Escribano
- Pablo Jimenez de Parga
- Juan Moscoso del Prado
- Miguel Sebastián

By gender:
- Men 11 | 69%
- Women 5 | 31%

By age range:
- More than 50 14 | 87,5%
- Between 30 & 50 2 | 12,5%

Executive Committee

Executives: 2 | 25%
- Ángel Escribano - Chairperson
- José Vicente de los Mozos

Independent: 3 | 37,5%
- Francisco Javier García*
- Ángeles Santamaría
- Bernardo Villazán

Proprietary: 3 | 37,5%
- Jokin Aperribay
- Antonio Cuevas
- Pablo Jimenez de Parga

*Remain in office until June 25

Remuneration Committee

Executives: 0 | 0%

Independent: 3 | 60%
- Bernardo Villazán
- Virginia Arce
- Olga San Jacinto

Proprietary: 2 | 40%
- Javier Escribano
- Juan Moscoso del Prado

Audit and Compliance Committee

Executives: 0 | 0%

Independent: 4 | 57%
- Virginia Arce - Chairwoman
- Belén Amatriain
- Coloma Armero
- Ángeles Santamaría

Proprietary: 3 | 43%
- Javier Escribano
- Juan Moscoso del Prado
- Miguel Sebastián

Appointments and Governance Committee

Executives: 0 | 0%

Independent: 3 | 60%
- Olga San Jacinto - Chairwoman
- Belén Amatriain
- Bernardo Villazán

Proprietary: 2 | 40%
- Jokin Aperribay
- Antonio Cuevas

Sustainability Committee

Executives: 0 | 0%

Independent: 3 | 75%
- Belén Amatriain
- Elena García
- Olga San Jacinto
- Ángeles Santamaría

Proprietary: 1 | 25%
- Miguel Sebastián

Strategy Committee

Executives: 1 | 17%
- Ángel Escribano - Chairperson

Independent: 4 | 66%
- Belén Amatriain
- Coloma Armero
- Olga San Jacinto
- Bernardo Villazán

Proprietary: 1 | 17%
- Antonio Cuevas

3.2   Ethics and anti-corruption

Indra Group is committed to carry 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.

The Group has the firm commitment to establish a solid culture of compliance and integrity. The mentioned above culture is based on "do the right thing" and it is applicable to all the professionals and partners of Indra Group (representatives, suppliers and other third parts that provide services to Indra or that, at any rate, act on his name) who are responsible to comply with legislation in force and apply the principles of Indra Group.

Indra Group has a **Compliance Model** consisting of the Criminal Risk Prevention Model and the Antitrust Risk Prevention Model focused on promote a culture of compliance and to prevent any activity that violates the legality in the field of our business.

The **Audit and Compliance Committee** of the Board of Directors is the maximum body of control of the Model and the Compliance Unit is the responsible to implement and execute the Model.

The **Compliance Unit** establishes, coordinates and executes a series of measures and procedures to control, prevent and detect unethical conduct, ethical or criminal violations or irregularities and infringements or irregularities in terms of the Competition Law, at global level.

The Compliance Unit reports directly and exclusively to the Auditing and Compliance Committee and is an area which is completely independent from the rest of the Group. Within the international subsidiaries, their respective governing bodies are the chief supervisors of the models for the prevention of criminal and competition risks locally. The duties performed by directors are carried out in accordance with the general principles and criteria established by the Auditing and Compliance Committee to govern regulatory compliance at a global level.

The Compliance Unit is responsible for informing the Auditing and Compliance Committee on a monthly basis of any critical concerns (understood to mean the conclusions reached in proceedings that have revealed a hypothetical criminal or competition risk for the Group), which are then passed on to the Board of Directors where necessary.

Code of Ethics and Legal Compliance

To accomplish with the mentioned commitment and to keep a control environment and continuous improvement, Indra Group has a Code of Ethics and Legal Compliance.

Indra Group's Code of Ethics and Legal Compliance, provides an irrefutable reference framework and establishes the operational principles and the rules of conduct that must be observed by all the group's employees and partners.

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

In accordance with the established principles, the Group has formulated its Standards of Conduct such as the rejection of corruption, bribery and fraud, the protection of competition, conflicts of interest, information security, equality and non-discrimination, and sustainability, among other matters .

- Zero tolerance for corruption, bribery and fraud
- Conflicts of interest
- Defence of free and fair competition
- Information Security, Data privacy and intellectual and industrial property
- Sustainability
- Equality and Non-Discrimination
- Occupational health and safety
- Economic-financial responsible and transparent management
- Foreign trade of defence materials and dual-use goods
- Money laundering and terrorist financing prevention•
- Protection of Antitrust

The Code reflects the group's commitment to respect the UN's Guiding Principles on Business and Human Rights, its International Declaration of Human Rights, the principles relating to the rights established in the Declaration of the International Labour Organization and the ten principles of the United Nations Global Compact.

Indra Group's Compliance Models

The Code of Ethics, the Criminal Risk Prevention Model, the Antitrust Risk Prevention Model and the procedures and politics of Indra Group, establishes action guidelines and controls, which are executed periodically in the different areas of the Group to minimise the potential risks of unlawful conducts perpetrated by Professionals and Partners of Indra.

Criminal risk prevention model

The Criminal risk prevention model sets out the model for the organisation, prevention, management and control of criminal risks for Indra Group.

The primary aims of this manual are to ensure the effectiveness of certain rules and control procedures that will minimise the risk of criminal behaviour by Indra Group employees and service providers, and demonstrate that it exercises proper controls over its business activities, thus complying with the requirements of Criminal Codes.To this end, the Compliance Unit has established a procedure with the aim of regularly identifying and assessing any criminal risks that may hypothetically emerge at the Group as the result of the business activities in which it engages; and reviewing, updating and implementing controls to prevent these risks.

Anti-Corruption

Indra Groups has an Anti-Corruption Policy that was created as an extension of the Rule entitled "Rejection of corruption, bribery and fraud" in the Code of Ethics and Legal Compliance. The Policy is aimed, on the one hand, at defining certain kinds of prohibited conduct that are similar to or associated with corruption, thus further developing and supplementing this Rule. On the other hand, it aims to bring together all internal anti-corruption procedures and order the regulations governing this issue, facilitating their consultation and creating awareness as a result.

Indra Group's Criminal Risk Prevention Model also establishes certain controls that are regularly carried out within the different departments of the Group to mitigate these risks.

These controls are carried out via multiple internal policies and procedures related to, among others, the following departments:

- Procurement. Procedure for the Screening and Authorisation of Suppliers, chains of authorisation for the issuance of purchase orders and Management of PEP-related issues with suppliers.

- Corporate mergers and operations. Procedure for Corporate Mergers and Acquisitions.

- Markets. Procedures for Hiring Commercial Consultants and Strategic Advisors.

- Bids. Internal regulations of the Tendering and Procedural Committee for the control and monitoring of bids and Temporary Consortia (UTEs in their Spanish acronym).

- Strategy. Policy on the Authorisation of Donations and Sponsorships.

- Administration. Procedure for Employee Expenses and Corporate Hospitality.

Preventive mechanisms include, among others, training initiatives on issues of corruption and bribery and the publication and distribution of policies and procedures in this regard.

> The Anti-Bribery Management System is certified under the ISO 37001 standard in Spain, Italy, Brazil, Colombia, Mexico and Peru.

Indra Group has implemented an anti-bribery management system in its main geographic areas, certified under the ISO 37001 standard, with the aim of reinforcing management in this area. As part of the management system, the Group carries out risk assessments and specific anti-bribery training.

Competition Law Risk Prevention Model

Indra Group has a Model for the organisation, prevention, management and control of anti-competitive risks to which the Group is exposed and has introduced measures to avoid incurring these risks in practices which infringe the applicable legislation in terms of competition.

The implementation of a System of Compliance in matters relating to competition allows the Indra Group to promote free competition in all the countries where it operates and thus avoid engaging in practices that may distort the markets.

The ultimate aim of this manual is to ensure the effectiveness of certain rules and control procedures that will minimise the risk of anti-competitive practices by Indra Group employees and service providers, and demonstrate that it exercises proper controls over its business activities, thus complying with legal requirements.

Culture and training

Indra Group is continually working to raise awareness of the Models for the Prevention of Criminal and Competition Risks and the Code of Ethics and Legal Compliance, both among its own employees and among suppliers.

With the aim of fostering a culture of compliance, the Compliance Unit engaged in differnts initiatives as in-person and online training, monthly internal communications, annual reports or external communications in forums.

Ethics and compliance training
(nº professionals)

57,298

Training on issues of Ethics, Compliance and Competition is mandatory for all Indra Group employees and service providers. In its Code of Ethics, the Group provides for the Code's publication and distribution among its employees and service providers, all of whom will be properly informed of its scope and its mandatory nature. October 2024 saw the launch of the annual online course on Ethics and Competition aimed at all Indra Group employees at the international level.

In addition, over the course of the Compliance Unit engages in others training as awareness-raising campaign, specific training sessions to director, the management teams and project and onboarding training for the employees of the companies acquired over the course of the financial year.

Refer to 2024 Sustainability Report chapter 8.3. G1-1. Business conduct policies and corporate culture and chapter 8.5. G1-3. Prevention and detection of corruption and bribery for comprehensive details on Indra Group's all initiatives developed in 2024 on ethics, compliance, anti-corruption and competition culture and training.

Direct Channel

The **Direct Channel** is the Indra Group's preferred confidential communications channel for all the directors, managers, employees, representatives, suppliers and other third parties who provide their services to the Indra Group or who act on behalf of the Group in any other way, such as agents, intermediaries and subcontracted companies, regardless of the territory in which they operate, along with other third-party stakeholder groups with a legitimate interest.

The Direct Channel is made available to all of the above parties so that they may report anonymously any queries regarding the interpretation and application of the Group's Code of Ethics and Legal Compliance and the regulations by which it is implemented, along with any unlawful behaviour, irregularity or offence detected in relation to the Code and its regulations.

The procedure to be followed by the Compliance Unit when processing, investigating and resolving complaints is described in the Direct Channel Management Protocol, which forms part of the Indra Group's internal regulations and will be made available to all the people affected by the complaint. The actions of the Compliance Unit are in all cases performed in accordance with the principles of impartiality, confidentiality and independence, and complaints are responded to within the time periods set out in the legislation in force.

The Board of Directors appointed the Indra Group's **Chief Compliance Officer** as Head of the Information System, which the Group's whistleblower channel forms part of. In turn, the Head of the Information System appointed members of the Compliance Unit to manage the whistleblower channel, as required in order to ensure that it operates correctly.

The Compliance Unit includes information on the Direct Channel in the mandatory training initiatives that it provides. It also provides information for all employees in announcements and news items published on the 'Doing the right thing' blog on the Group's Intranet.

Type of irregularity	Irregularities No. of actual cases 2024
Corruption or bribery	0
Discrimination or Harassment	52
Customer Privacy Data	0
Conflicts of Interest	1
Money Laundering or Insider trading	0

Note: The table shows materialised irregularities in 2024 of cases reported through the Direct Channel. Materialised irregularities refer to those in which the Indra Group has taken some kind of action, either disciplinary or non-disciplinary.
With regard to irregularities of discrimination and harassment, the information set out in the 2024 Sustainability Report (142) pertains to notified cases (refer to 2024 Sustainability Report page 244). The cases reported in the above table refer to the cases that finally materialised (52).

Refer to 2024 Sustainability Report chapter 8.3. G1-1. Business conduct policies and corporate culture and chapter 8.5. G1-3. Prevention and detection of corruption and bribery for comprehensive details on Indra Group's ethics and anti-corruption model.

3.3 Financial and sustainability risk management

The risk factors which affect Indra Group depend on the countries where it carries out its activities and the nature of the sectors in which it operates. Indra Group aims to identify and evaluate the risks so that it can introduce measures far enough in advance in order to mitigate the impact and/or probability of these risks actually materialising and/or having a potential impact on its business objectives.

The main risks that affect Indra Group implementing its strategy including risk materialization are outlined in section 8 of the Management Report, which includes those risks related with ESG.

Indra Group's **Risk Control and Management System** is a process advocated by the Board of Directors and Senior Management, the responsibility of which falls upon each and every member of the Group. The purpose of the system is to provide reasonable certainty regarding the achievement of the established objectives.

Indra Group is also strongly committed to complying with the most demanding principles and processes of risk management, which is why since 2020 it has had its system certified to ISO 31000 standards by an external audit provider, which offers it three advantages, given that it ensures the key elements of risk management have been included and implemented, guarantees independent external verification and drives continuous improvement.

The certification process assesses the extent to which a risk management system's design aligns with the requirements on best practice described by ISO 31000.

> The Risk Management System, externally certified under the ISO 31000 standard, places a special focus on ESG risk assessment

Against this backdrop, in 2024 Indra Group renewed its Risk Management certification with AENOR under the ISO 31000 standard. This highlights that the Group's Risk Control and Management System is compliant with the principles, processes and best practices in terms of governance and accredits the effective integration of risk management across the Group's operations, with the special consideration of non-financial aspects related to its performance in matters of ESG and climate change in the internal and external risk factor management process. The results reveal good practices without any recommendations. The ISO 31000 certification demonstrates that Indra's Risk Control and Management System is fully aligned with the Group's new strategy, as set out in the Leading the Future Plan for its four business areas. This was recognised as a strength by AENOR during the audit.

This certification is valid for three years, with annual internal and external audits, ensuring that the key elements of the system are effectively in place, and that the Group continues to strive to make continual progress and improvements. This allows Indra Group to demonstrate its commitment to sustainability and further strengthen its resilience, as continually identifying and managing threats and opportunities places the Group in a privileged position regarding the challenges faced in an increasingly competitive and ever-changing global environment.

Indra Group is in the process of maturing an **Internal Control System over Sustainability Information** inspired by the existing system for financial information control.

Risk Management Process

Definition of effective risk information flows. The aim is to ensure key matters are reported, appropriate decision-making is made, and stakeholder expectations are met

Continuous monitoring of risks by means of tools to assess their evolution

Identification of internal and external events affecting the company's objectives

Identification of the potential causes and effects of risks in terms of the likelihood of their occurrence and impact.

Selection of possible responses by the company's management Definition of actions to align risks with the company's risk acceptance and risk tolerances
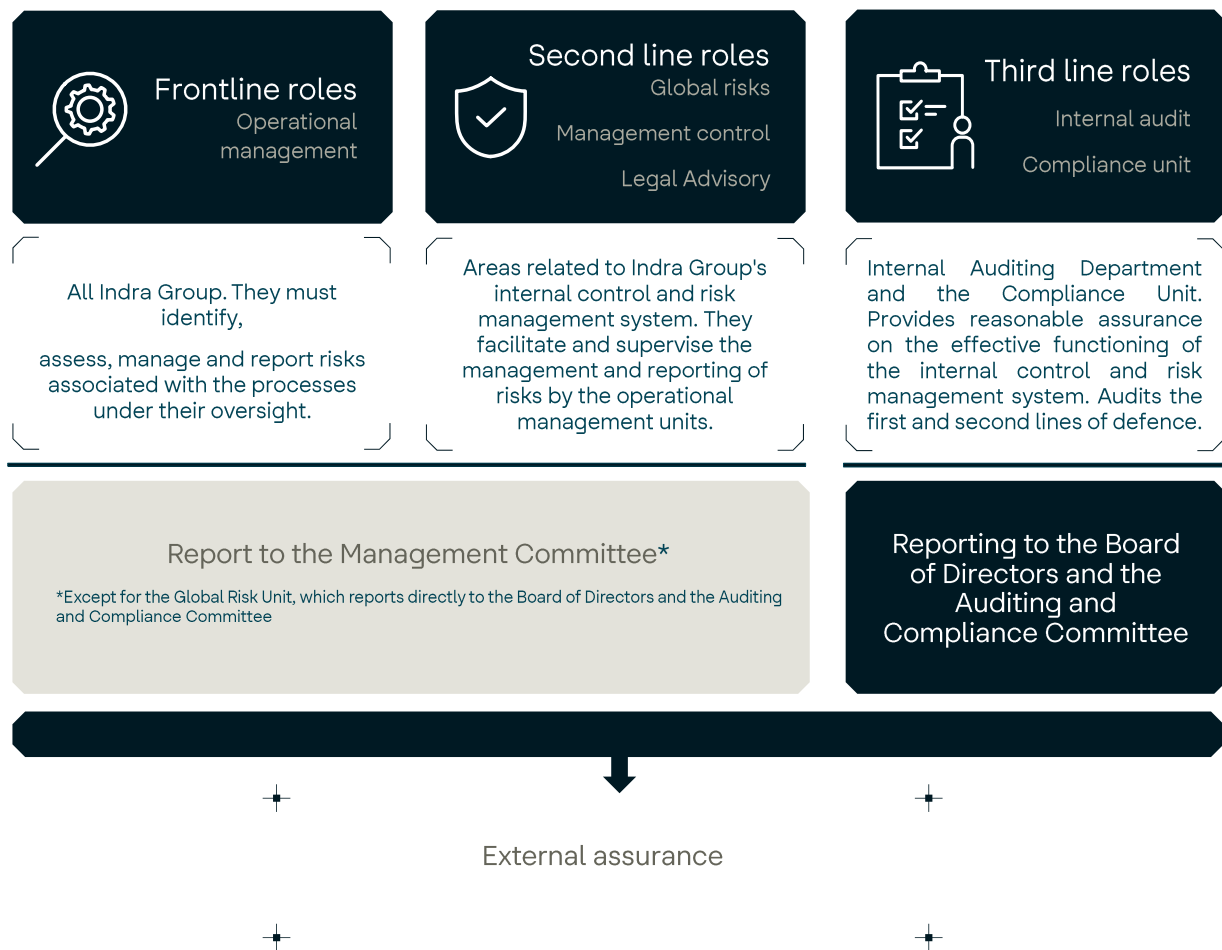
This system will consider within its scope all the information included in the disclosure perimeter established by Indra Group for the Sustainability Report. These internal controls maintain traceability with the material matters identified by the Group, as well as with the business risks that are relevant to sustainability topics and the processes executed around the exercise of disclosing sustainability information. Periodically, the Internal Audit area assess the framework to identify opportunities for improvement; considering expansions in the information perimeter, process automation, and regulatory changes in sustainability matters. The system is being reinforced on the basis of ideas suggested by the Committee of Sponsoring Organizations of the Treadway Commission (COSO) and covers its five key components.

In terms of adapting to an ever-changing world, Indra Group regularly updates its Risk Control and Management Policy, which was initially approved by the Board of Directors in 2016 yearly updated, the last review was conducted in February 2025.

In addition to the Policy, Indra Group has developed a set of manuals and procedures focused on risk management as the Risk Management Manual, which outlines the processes for the Group's risk identification and management, risk management procedures, risk management criteria or the Project Management and Project Risk Management Method. These are reviewed and regularly updated to ensure compliance with the legislation in force and the best risk management practices.

Furthermore, the risk management system is supported by internal regulations that cover the group's primary processes, including Code of Ethics and Legal Compliance, Policies and procedures for Business Continuity, Procurement Policies and Procedures, Sustainability Policy, Tendering Committee Regulations, Policy for communicating with shareholders, institutional investors, proxy advisors and other stakeholders, and criteria for reporting financial data, non-financial data and corporate information, among others.

For further information on the description of the risks and the Risk Control and Management System, please see section 8 of the Management Report and section E of the Annual Corporate Governance Report, both of which are available on the Group website.

Frontline roles
Operational management

All Indra Group. They must identify,

assess, manage and report risks associated with the processes under their oversight.

Second line roles
Global risks
Management control
Legal Advisory

Areas related to Indra Group's internal control and risk management system. They facilitate and supervise the management and reporting of risks by the operational management units.

Third line roles
Internal audit
Compliance unit

Internal Auditing Department and the Compliance Unit. Provides reasonable assurance on the effective functioning of the internal control and risk management system. Audits the first and second lines of defence.

Report to the Management Committee*

*Except for the Global Risk Unit, which reports directly to the Board of Directors and the Auditing and Compliance Committee

Reporting to the Board of Directors and the Auditing and Compliance Committee

External assurance

Integration of risk management culture

Based on the framework set out in the COSO Report entitled Enterprise Risk Management, Integrating with Strategy and Performance (ERM 2017)[5], which particularly stresses the importance of culture and the principled approach, Indra Group integrates risk management concepts within its culture based on the following principles:

- **Identifying, assessing, monitoring and reporting risks:** Indra Group's Global Risks Unit involves the Group's various operational and corporate units in the regular (at least once a year) review and update of the catalogue and map of the Group's risks. The catalogue of risks includes those related to human rights, climate change, among others. The Group identifies its global risks through specific analysis of recognised sources, emerging risks, internal documents and interviews with risk owners and key employees. The risk map is presented both to the audit and compliance committee and board of directors. It also regularly monitors risks and mitigation actions and, as with the risk map, reports its findings to the Auditing and Compliance Committee in the interests of its risk supervisory obligations. Additionally, Indra Group has formal committees for identifying risks. These allow employees to proactively identify and report potential risks as soon as a project enters the bidding stage. These risks are documented in the corporate tools. Indra Group has management tools that enable the Group to identify, quantify and propose measures to mitigate risks throughout the entire lifecycle of a project. Finally, monitoring committees are set up to identify and analyse risks related to the Group's operations.

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[5] COSO (Committee of Sponsoring Organizations of the Treadway) is a voluntary committee comprising representatives of five private-sector organisations in the US to give intellectual leadership to three interrelated themes: corporate risk management (ERM), internal control and the deterrence of fraud.

- **Disclosure and training:** the Group's key values (set out in the definition of its culture) are actively notified to all Indra Group employees via the various channels at the Group's disposal, including the onboarding courses for new recruits and the Group's intranet. As part of the annual process to update Indra Group's Training Plan, the Group identifies training requirements, including those that may be associated with risk management. In 2024, via its training plan Indra Group developed specific training to target important areas such as people management, occupational risk prevention, cybersecurity, project management and the management of tenders, tax management, ethics and compliance. Via these courses, the Group controls risk such as talent retention, health and safety, information security and privacy, compliance with project milestones, fiscal compliance, competition and corruption and bribery.

- **Screening and performance evaluations:** the professional profiles of the positions at Indra Group (particularly in the case of the management team) and annual performance evaluations are based on the Group's key values and incorporate the principles of risk management.

- **Remuneration and financial incentives:** the Group's remuneration system is aligned with risk management principles. At the highest level of the organisation, decisions on the remuneration of Indra Group's executive directors and senior management incorporate the necessary precautions to avoid assuming excessive risks and rewarding unfavourable management results, as reflected in the Remuneration Policy. The variable remuneration paid to the heads of departments that manage Group risk (e.g. the departments of compliance, prevention of occupational risk, information security, etc.) is dependent upon the proper management, disclosure and integration of risks throughout the whole Group.

Risk prioritisation

The Indra Group's risks are prioritised[6] based on the level of residual risk, which is calculated by combining the results of the impact and probability assessments for each risk. The main risks in each risk category and their level of priority are listed below:

- **Strategic Risk.** This risk arises from the Group's strategic position in the environment in which it engages in its business, and it relates to the difficulty of meeting the objectives set out in the Strategic Plan. The most significant (priority 2) are those related to changing technology and the variation in prices of materials, services and labor, followed by (priority 3) the socio-political, economic and labor situation, price competition and regulatory changes.

- **Operational Risk.** This arises from potential threats associated with products and services, both from the point of view of preparing bids and negotiating contracts, and from their execution and delivery, all of which may result in a significant loss of profitability and cash flow. Such situations could affect the Group's reputation and commercial solvency in the sectors and regions in which the Group operates. The most significant (priority 1) are those associated with talent management, followed by (priority 2) those associated with supplier management, integrated project management and information security.

- **Financial Risk.** This results from alterations in the financial and assets and services markets that may affect the cost of the Group's business activities, including risk relating to exchange rates, liquidity and interest rates, in addition to the credit risk associated with a counterparty that may result in an economic or financial loss for the Group. The most significant (priority 3) are those associated with working capital management, foreign exchange rate fluctuations, interest rate fluctuations and credit.

- **Compliance Risk.** These are risks associated with the failure to comply with current legislation, and the regulations, standards and codes of conduct that govern a given activity, in all the markets where the Group operates. They primarily have to do with the prevention of criminal activity and fraud, and the legal obligations that arise from the activities the Group engages in.

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[6] The level of residual risk is measured by combining a risk's probability with its impact on different areas. For the purposes of this report, a risk's impact in revenue terms was used: Priority 1 (over €100 million), Priority 2 (between €50 million and €100 million), Priority 3 (less than €50 million).

The most significant (priority 3) are those related to Tax, Corporate Governance, International Trade and Competence.

Refer to 2024 Sustainability Report chapter 1.7. GOV-5. Risk management and internal controls over sustainability reporting for comprehensive details on Indra Group's financial and sustainability risk management.

Emerging risks

As part of the risk-management cycle described above, Indra includes a timeline that allows it to identify, assess and manage any risks that may have an impact on the business over the medium or long term and that may require specific mitigation or response measures.

Examples of the emerging risks identified by the Group includes the international trade risks, and the uses and regulation of artificial intelligence.

International trade risks

Description

The new Administration in the U.S. Government is implementing significant changes in foreign and economic policy. Based on the goal of addressing persistent trade deficits with other countries or trading blocs, the U.S. Government announced on April 2nd the imposition of import tariffs to most of the goods from its trading partners. Although a 10% global tariff stayed in place, additional tariffs were temporarily suspended with the intention of negotiating new bilateral agreements.

So far, the announcement of tariffs is reigniting trade tensions with the U.S. While the potential impact on trade relations between the U.S. and the EU remains uncertain, the foreign and economic policy turn in the U.S. has made European governments rethink their trade, defence, and security strategy.

Indra operates in the U.S. through its subsidiary companies in the ATM, Mobility and IT Services markets. Consequently, the Group faces the risk of having its products directly affected by the tariffs imposed in this context, either by the U.S. or by other countries in response to them, or indirectly due to inflation and supply chain disruptions driven by this situation.

Impact on Indra

This situation is continuously being monitored by Indra Group. It is still early to determine the impact of U.S. tariffs, as they have not been clearly defined yet. Nevertheless, the Group expects any impact to be mainly limited to the Group's direct operations in the U.S and related to potential cost increases driven by inflation or supply chain disruptions. It therefore would not represent a significant impact to the Group's global business.

Mitigating measures

In order to be able to adapt to any changes as they occur, Indra Group is:

- Monitoring the evolution of trade tensions and negotiations between the U.S. and the EU to determine the real impact on Indra's business and its supply chain.
- Assessing Indra Group's supply chain to reduce dependencies on goods affected by tariff increases.
- Analysing the presence of legal provisions in existing contracts that could mitigate additional costs resulting from tariffs.

Uses and regulation of Artificial Intelligence

Description

In recent years, Artificial Intelligence has undergone significant advancements, leading to a growing number of applications across diverse business sectors. The increasing use of AI has raised concerns around ethics and information security that remain unresolved from a technological and regulatory standpoint, creating a situation of uncertainty for companies integrating these technologies into their products and processes.

The approval of the European Union's AI Act in June 2024 and the entry into force of some of its requirements in February 2025, introduce new regulatory obligations for companies developing or deploying AI systems, depending on their risk level.

Additionally, while AI adoption offers significant potential to improve operational efficiency and reduce costs, it may also lead to structural changes in business models, creation of new jobs, need for substantial reskilling efforts and a challenging environment for AI talent attraction and retention.

Impact on Indra

There are several potential impacts that these risks could have on Indra:

- Impact on competitiveness: Indra is exposed to the risk of falling behind its competitors in the AI race or failing to develop new products and services that integrate it.
- Reputational impact: Indra provides solutions in sensitive areas such as healthcare, education, financial services and electoral processes, where unethical uses of AI could undermine the rights of users. In such cases, Indra faces reputational risks that threaten its ability to build and maintain relationships with its key stakeholders (employees, clients and investors).
- Legal impact: Indra faces the risk of adapting its internal processes to the legal requirements contained in the EU AI Act and further regulations to be approved.
- Labour impact: the integration of AI technologies may result in increased pressure on Indra to reskill its employees and attract specialized talent. If Indra fails to adapt to these changes, it can affect its productivity and employee engagement.

Mitigating measures

Indra makes sure to stay on top of regulatory and technology trends, and through professional development programmes, ensures that its employees have the skills needed to help us adapt to the challenges of AI. For instance, the Group has planned AI trainings, including specific sessions for its Board of Directors and Management Committee.
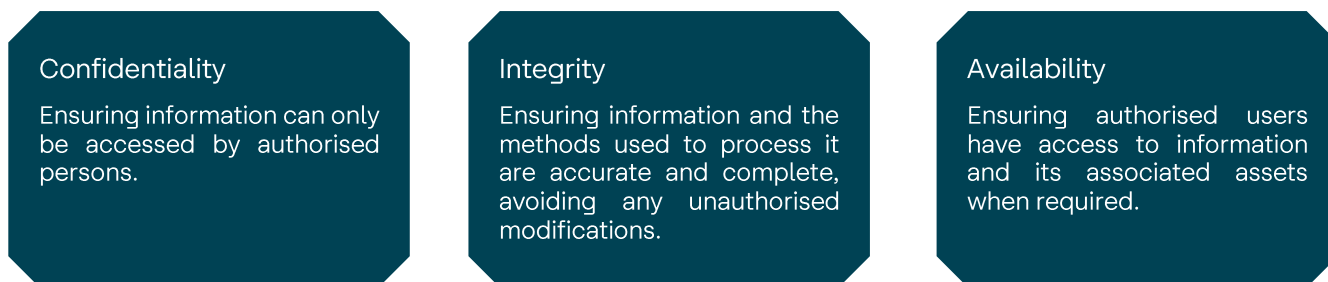
The Group also counts with experts in responsible AI, as well as lawyers specialising in data (e.g. GDPR) and AI legislation (e. g. the AI Act), ensuring compliance and the implementation of best practices in the development of AI solutions.

The Group is developing a specific governance model for AI which includes a corporate policy that reinforces its commitment to the responsible, transparent, safe and reliable use of AI systems and algorithms.

3.4 Information Security

Indra Group considers information to be one of its most critical assets, which it is why it has deemed it necessary to establish suitable measures in all locations where information can be stored or from which it can be transmitted.

To this end, Indra has established a comprehensive set of policies and procedures to govern information security within the Group. Information Security Policy has been established for the purposes of ensuring:

Confidentiality

Ensuring information can only be accessed by authorised persons.

Integrity

Ensuring information and the methods used to process it are accurate and complete, avoiding any unauthorised modifications.

Availability

Ensuring authorised users have access to information and its associated assets when required.

This policy defines the general guidelines for the protection of the Indra Group's information-related assets to define a framework for the Information Security Model and its management.

All the companies that belong to the Indra Group accept these principles, and it is the responsibility of all involved to put them into practice, both by complying with them themselves and by passing them on for application by the suppliers, subcontractors, associates and service providers that participate in the Group's operations.

Information security governance model

The Indra Group has defined an **Information Security Governance Model** that ensures the coordination and management of Information Security at Indra Group, providing a framework for responsibility and oversight that guarantees the proper management of risk at the Group and ensures that security strategy is aligned with business objectives and compliant with regulatory requirements.

The Information Security Department is responsible for overseeing the implementation and operation of the controls and procedures that help minimise the information security risk to which the Group is exposed.

On a regular basis, and at least once a month, the **Chief Information Security Officer** (CISO) reports to the Management Committee on the performance of the controls applied and any incidents that may have arisen over the period reported, along with monitoring of the Group's Information Security strategy, as defined and endorsed by the Security Committee.

In addition, on a regular basis, and at least once a year, the CISO reports to the **Auditing and Compliance Committee** on the current state of cybersecurity, advances in the levels of maturity and risk relating to information security, the evolution of threats, the resources allocated to ensure the security of the networks and information systems, the incidents that have been managed, the current state of security in supply chain operations that depend on third parties, provides a cyber-intelligence report that includes the main threats and agents, and reports on any other relevant decision taken in relation to security issues, as well as any obstacle that could affect the performance of its duties. The members of the Auditing and Compliance Committee have been appointed based on their experience in the management of financial and non-financial risk, with cybersecurity forming one of the areas in the Board's skills matrix.

Critical-impact incidents

0

Users training

97%

Information security model

The aim of the Indra Group's Information Security model is to define and implement the most effective controls and procedures to minimise and manage risks in the Group's internal processes, in its daily operations, in the development and execution of projects, programmes and services and in customer management. This model is based on:
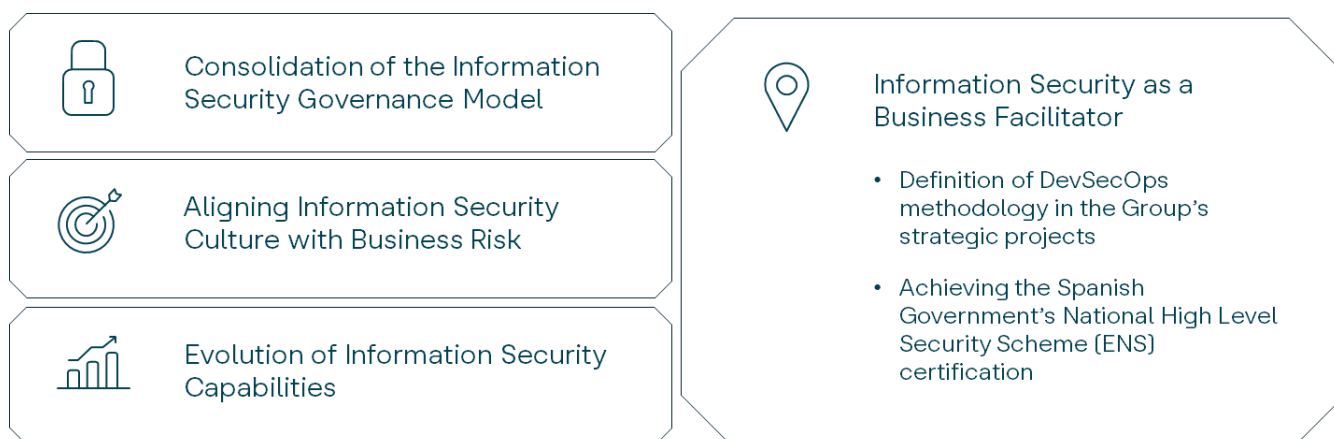
- **Information security governance**, which ensures correct coordination and organization of information security across all levels. At its helm is the CISO (Chief Information Security Officer), who reports directly to the Audit and Compliance Committee (ACC) and the Risk Coordination Unit (RCU) and is responsible for coordinating information in the Group. The CISO's main function is to develop Indra's information security strategy, objectives and plans. This area also includes the security and market LISOs (Local Information Security Officers), whose main function is to ensure information security in the markets and subsidiaries under their jurisdiction.

- **An information security regulatory framework**, applicable to all markets and areas of the Group, as well as to all Indra companies, offices and subsidiaries. Compliance with this regulatory framework is mandatory for the entire Indra group and at its core is the information security policy, which establishes the basic security principles underpinning the framework. The current version of the Information Security Policy was approved by the Board of Directors on March 27, 2023.

- **Awareness and continuous training in Information Security** during all phases of employment, which aims to raise understanding and learn all users of the Group, so that everyone in the Group is aware of their responsibility in the field of Information Security and the criticality of protecting the confidentiality, integrity and availability of the information handled, both ours and our customers.

- **Technology and security controls** as an end-to-end solution encompassing physical and environmental security controls to prevent unauthorized physical access, damage and interference in the organization's facilities and information, as well as logical security controls to preserve the confidentiality, integrity and availability of information and the resources for processing it.

- **The audit and compliance monitoring processes**, as verification and control mechanisms, internally through continuous supervision and monitoring processes, which are permanently active, such as security and network monitoring processes, audits of platform and application technical vulnerabilities and validation processes before the connection of platforms to the Indra Group network.

In order to integrate its model, Indra Group has developed an **Information Security Management System**, certified under the ISO 27001 standard. The system is responsible for defining, implementing and improving controls and procedures to minimise and manage the risks in the Group's internal processes, its daily operations, the development and execution of its projects, programmes and services, and its customer management.

> 90% of Indra Group's sales are via companies certified under the Information Security ISO 27001 standard

In addition, Indra has obtained certification in other specific areas, some of the most important of which are ISO 20000 on IT Service Management Systems, ISO 22301 on Business Continuity Management Systems, ISO 27018 on Requirements for the protection of personally identifiable information, and ISO 31030 on Travel Risk Management, along with certification from Cyber Essentials and PCI DSS.

Furthermore, the Group implemented the following information security action plans during the year:

Consolidation of the Information Security Governance Model

Aligning Information Security Culture with Business Risk

Evolution of Information Security Capabilities

Information Security as a Business Facilitator

- Definition of DevSecOps methodology in the Group's strategic projects

- Achieving the Spanish Government's National High Level Security Scheme (ENS) certification

Refer to 2024 Sustainability Report chapter 10. Entity Specific 2. Information security, privacy and data protection for comprehensive details on Indra Group's information security.

3.5   Privacy and personal data protection

Indra Group recognises the importance of guaranteeing the appropriate processing of personal data and considers its protection to be a fundamental aspect for the Group. For this reason, data protection is integrated as an indispensable part of the processes involving data processing and of the organisation's strategic planning.

Indra Group is a B2B company, so its treatment of the personal data of clients which represent the legal entities with which the Group holds a commercial relationship allows for no other treatment and it is therefore not necessary to use personal data for secondary purposes.

Also, in relation to the users who contact the Group via its website, the legal advice on privacy recognises that the supply of information regarding products and services is the main purpose of the information collected, and this information is not used in any other way that could be considered a secondary purpose. This principle is further supported by the principle of "data minimisation" via which Indra Group only gathers the minimum and purely essential information to contact other companies. With this sole purpose, Indra Group maintains a register of website users who have contacted the Group, storing only the minimum amount of information necessary (email and IP address and the contents of the consultation made) in accordance with applicable law. This information is not used for any other secondary purpose given that Indra's relationship with website users does not involve the provision of services, and therefore there are no cases where the transfer of this data to other service providers is requested.

The purpose of the Indra Group's **Privacy and Data Protection Policy** is to ensure effective and consistent personal data protection in all of the Group's activities, through the definition of certain universal privacy principles. The Group's privacy management objectives are set out in the Policy, which is available to the public. The policy helps to ensure the security of personal data and prevent its alteration, loss, processing or unauthorised access.

The Policy establishes that data of a personal nature collected has to be appropriate, pertinent and not excessive, and collected for explicit and legitimate ends; identifies the channels facilitated by the Group so that users can exercise their rights; describes the assumptions made by the Group when processing personal information; and defines what type of personal data are considered to be sensitive.

It is worth noting that Indra Group's undertakings in this area are also covered in the Group's Compliance Model and the Code of Ethics and Legal Compliance, the due diligence system and Human Rights Policy, and the financial and sustainability risk management model. In this way, Indra Group recognises that for every one of the stakeholders with whom it interacts, data security and privacy is a fundamental human right, and the Group therefore complies with its obligation to respect and defend these rights.

Privacy and personal data protection governance model

Indra Group has defined a global **Privacy and Data Protection Governance Model** that ensures the correct coordination and organisation in matters of Privacy.

Since 2010, Indra Group has had a **Privacy and Data Protection Office** which is charged with overseeing and supervising the measures required to ensure proper compliance with the legislation in force in the area of personal data protection. The Office oversees the implementation of controls and procedures that help minimise the privacy risk to which the Group is exposed.

The Office is led by the Group's **Data Protection Officer** (DPO). As required under Article 38 d) of the General Data Protection Regulation (GDPR), the DPO shall directly report to the highest management level of the controller or the processor. This requirement is met in the following way:

- Every year, the DPO reports to the Board of Directors' **Auditing and Compliance Committee** (ACC) on the internal compliance control model.
- Every six months, the DPO reports to the **Risk Coordination Unit**, informing them of the performance of the controls and any potential incidents that have occurred during the financial year.
- In order to strengthen the independence of privacy measures at the Group, the DPO and the Privacy Office currently also report to the **Chief Legal Officer** (CLO), who is the Deputy Secretary of the Board of Directors and a member of the Management Committee, clearly demonstrating the Group's commitment to Privacy.

Privacy and personal data protection model

Indra Group defines its **privacy and data protection strategy** in accordance with the following principles, which represent the Group's aims when it comes to privacy management:

- **Lawfulness, fairness, and transparency.** This is based on the premise that personal data must be processed legally, fairly and transparently with regard to the data subject.
- **Limitation of purpose.** This establishes that data must be processed for a specific purpose, and any secondary use that the data subject has not been previously informed of must be avoided.
- **Minimisation of data.** Only the minimum amount of data required for a particular purpose will be used.
- **Accuracy.** All the data processed must be precise, accurate and up to date.
- **Storage limitations.** All data must be retained only for the length of time necessary in order to achieve the purpose defined.
- **Integrity and confidentiality.** The duty of the data controller and data processor to adopt the appropriate security measures to prevent unauthorised access by third parties to the personal data they are handling, and to prevent this data from being accidentally or intentionally manipulated, destroyed or damaged.
- **Proactive responsibility.** This consists of the need for the data controller to apply the appropriate technical and organisational measures to ensure and demonstrate that data is processed in accordance with the Regulations.

This strategy is implemented in the Group through its **Information Privacy Management System (IPMS)** in accordance with **ISO/IEC 27701** Privacy Information Management. The IPMS is the framework within which the most effective controls and procedures are defined, implemented and continuously improved with a view to minimising and managing privacy and data protection risks. This management process, as well as the implementation and effectiveness of the Privacy and Data Protection Policy and procedures, is guaranteed through the performance of internal audits and third-party audits by AENOR.

> Indra Group has implemented an Information Privacy Management System (IPMS) in accordance with the ISO/IEC 27701

Furthermore, the Group implemented several action plans on privacy and responsible data protection throughout the year:

Development and Maintenance of Privacy Regulations	Advising corporate and business areas on privacy and data protection issues
Updating and maintaining a record of corporate processing activities	Advising on security impacts and incidents that could involve a data breach
Updating cookies policies on the websites owned by the Indra Group	Proactively reviewing projects that involve a high risk during the tendering
Maintenance of the Privacy Information Management System (PIMS)	Preparing an inventory of AI projects in which personal data is processed

The model is also applicable to possible requests for information from governments and/or administrations that depend on them. All requests for information from this type of body that affect the privacy of individuals will be dealt with in accordance with the principles established in the Indra Group's Privacy Policy and in strict compliance with the regulations in force.

Refer to 2024 Sustainability Report chapter 10. Entity Specific 2. Information security, privacy and data protection for comprehensive details on Indra Group's privacy and personal data protection.

4 Environment

4.1   Environmental management

As a technology company, the Indra Group is committed to sustainable development through innovative technology that is environmentally friendly and has a positive impact on the planet.

The Group's Sustainability Policy and Environmental and Energy Policy reflect Indra's commitment to the environment and to sustainable development. Both policies are aligned with the goals of the Paris Agreement and the United Nations 2030 Agenda for Sustainable Development.

The Environmental and Energy Policy establishes the basic principles and general framework for overseeing the environmental and energy management practices that the Indra Group commits to in its business model.

- Establishing a responsible environmental management model in the Group.
- Preventing, minimising and mitigating the Group's impact on the environment.
- Combatting climate change through actions aligned with the Paris Agreement by advancing the Group's transition to a low-carbon economy, effectively managing physical and transition risks and promoting adaptation and opportunities.
- Promoting responsible energy use by integrating efficiency in its operations and decision-making process and promoting energy saving and renewable energies.
- Promoting the development of technologies and products with a positive impact on the environment and applying circular economy and eco-design principles to its products.
- Improving environmental and energy performance in all areas of the Group and its value chain.

The Environmental and Energy Policy is approved by the Board of Directors. The **Sustainability Committee** is responsible for monitoring and supervising the objectives and principles of this policy and for reporting its conclusions to the Board of Directors.

The Sustainability and Environment Department is responsible for managing environmental due diligence, with the participation of the corporate areas involved and those responsible for promoting, coordinating, measuring and reporting, both globally and locally, the development and application of this policy.

Environmental Management System

The Environmental Policy is implemented through the Indra Group's **Environmental and Energy Management System** in accordance with ISO 14001 and ISO 50001 requirements and the EU's EMAS regulations.

The Group's management system provides a common, consistent and integrated framework and point of reference on environmental matters that can be used by all Indra Group organisations, allowing us to continuously assess our environmental performance.

The Environmental and Energy Management System is external audit by ANEOR in annual basis. The Group currently holds the following environmental certifications:

- **Eco-Management and Audit Scheme (EMAS).** The environmental management system at the Indra Group's corporate headquarters is certified under this scheme.

- **ISO 14001-2015 standard.** This standard covers the activities carried out by Indra at both its production sites and its offices. This certification requires high standards in a number of environmental areas such as carbon emissions, energy consumption, waste management, recycling, water use and employee awareness. In total, 69% of the Indra Group's employees work at locations with environmental certifications.

- **ISO 50001 standard.** Indra Group's corporate headquarters and two of the centres with the largest energy consumption in Spain, La Grela (Galicia) and Bembibre (Leon), are certified under this standard, designed to help assess new energy efficiency technologies and decide which should be prioritised, as well as improve energy efficiency, use and consumption.

> 93% of employees in Spain work at locations certified under the ISO 14001 environmental standard

In addition to the ISO 14001 and ISO 50001 certifications, Indra Groups conducts internal environmental audits in accordance with its environmental management procedures. The audits cover in a cycle of three years all the buildings certified ISO 14001.

Employees' environmental training and awareness

Indra Group is continually working to raise awareness of environmental matters .

In 2024, Indra Group took advantage of **World and International Days** celebrating the environment, water, recycling and biodiversity to raise awareness among its employees.

As a matter of policy established in 2021, the Group has been offering training on sustainability, including environmental management and climate change matters , as a component of the **on-boarding** process for new team members. As part of the training program, the Indra Group ensures that its employees are aware of the objectives of its ESG Plan and the Group's environmental action principles. Since 2021, 84% of employees have done the Sustainability training.

In line with the ESG Plan for 2024-2026, the Indra Group is committed to training all its product design and development engineers in eco-design. To this end, a training plan has been implemented, offering different levels of content and dedication to suit employees' needs and requirements. The objective of this training program is to **promote the principles of circular economy** to products. The training will cover a range of topics, including the environmental impacts of products (water and energy consumption, waste, hazardous substances), the life cycle of products and the principles of eco-design. In 2024, 77.6% of design and product development engineers received training in eco-design.

4.1.1 Energy

Improving **energy efficiency** and increasing the purchase of **green energy** are Indra's two key focus areas to comply with the Group's environmental and climate change objectives.

Therefore, in its **Environmental and Energy Policy**, Indra Group established an action principle of responsible energy use to promote the responsible use of energy as a fundamental pillar of its commitment to protecting the environment and fighting climate change by promoting efficiency in its operations and decision-making and promoting energy saving and renewable energy.

> Indra Group's has strengthened its commitment on energy management by extending the scope of the Energy Management System, to two of the largest consumption centres in Spain.

The use and consumption of energy at our sites is monitored to improve their energy efficiency through the Indra **Group's Environmental Management System**. The Management System allows the Group to maintain and improve the energy saving levels of the Group's, by means of the following:

- Applying mathematical models to real-time consumption data to produce forecasts for energy and power consumption in those centres where Energy Control Centre remotely controls and monitors the energy consumption.

- Establish quantitative energy usage and savings targets individually tailored to each of the Group's sites.

- Making daily adjustments to the energy consumption control systems located onsite based on such factors as occupancy level, peaks in activity, working hours and the weather, which maintains consumption curves at the optimum level in terms of savings, resulting in greater energy efficiency at the site.

- Monitoring the performance of each site's main production equipment, which, alongside energy audits carried out under the framework of Royal Decree 56/2016.

As part of this process, the group identifies improvement opportunities, energy efficiency measures, and other energy saving steps that could be taken to reduce energy consumption at our locations. Through the Energy Control Centre, the Indra Group programmes energy efficiency measures that are implemented directly in its plants by technicians specialising in energy efficiency like modified and renovated facilities; equipment; systems or on-site renewable energy production. In 2024, energy optimisation work (improvements in energy monitoring and control, optimisation of climate control and lighting, LED installation and expansion of energy self-generation facilities) was carried out at our locations in Spain, Italy and Brazil. In cooperation with Indra's energy supplier, energy saving measures were implemented in 8 sites with expected energy savings of 2,500 MWh.

All these energy efficiency measures have been key in optimising energy consumption. The results of these efforts can be seen in the Group's reduced energy consumption, which was down 40% in 2024 compared to 2019.

Another energy efficiency measure that Indra Group set out as a key objective in its ESG Plan is to increase the purchase of green energy to 90% in globally by 2026.

Since 2019, Indra has increased the percentage of renewable electricity used at the global level, taking it up to 92% in 2024. Spain (100%) and Portugal (100%) are the two leading geographies in terms of the Group's green energy consumption. In addition, in 2024 the Group used green energy in Italy (90%) and Australia (2%).

Reduction in energy consumption
2024 vs.2023

-8%

Renewable electricity consumed

92%

Indra Group's energy consumption is on a downward trend compared to previous years, thanks to energy efficiency measures and the Centre Optimisation Plan.

Consumption of natural gas and oil-based sources (diesel C) increased compared to previous years. A large part of the consumption of these sources comes from the simulation centre (Coslada, Spain), where a generator set is used to supply energy to the centre while waiting for the completion of the works for the commissioning of the transformation centre. Consumption at this site represents more than 95% of the Group's diesel C consumption.

In 2024, electricity consumption has been reduced as a result of the space optimisation plan and the switch to coworking centres, where Indra Group has no operational control over consumption. In Spain and Portugal, 100% of the consumed electricity is green, and 90% in Italy (100% of renewable electricity purchased since march 2024). As a result, the total consumption of energy from renewable sources increased to 83% in 2024.

Refer to 2024 Sustainability Report chapter 3.8. E1-5. Energy consumption and mix for comprehensive details on Indra Group's energy consumption.

4.1.2   Water

As part of its environmental management, Indra Group integrates **water consumption** and **wastewater discharge**. The efficient management of water consumption is particularly relevant given that climate change is expected to exacerbate water stress.

The principles of action set out in the Group's Environmental and Energy Policy include engage in rational water management, especially in water-stressed areas in our own operations and value chain, promoting sustainable water use based on long-term protection through water use efficiency and recycling, prevention and reduction of water pollution, and reduction of water withdrawals and discharges.

This is why the Group monitors, manages and sets targets for minimising the consumption of water at certain sites, within the framework of its Environmental Management System. Some of its initiatives aimed at minimising water consumption include the installation of water-saving mechanisms and water recirculating systems at the Group's facilities and actions carried out to raise awareness of responsible use of water among employees.

As far as wastewater is concerned, the Group's impact in terms of wastewater discharges and the quality of this wastewater is not judged to be significant, since water is primarily used for human consumption and for cleaning Group premises, and since our sites are mainly located in urban and industrial areas with municipal sewage systems.

At locations where a higher risk has been identified, water quality controls are carried out in accordance with local regulations as part of the controls performed under the Group's environmental management system. Additionally, measures are also taken to improve the quality of the water discharged, such as by installing separators and decanters or performing routine cleaning.

As part of its commitment to continuous improvement, the **Indra Group aims to strengthen its water management**. Therefore, as part of the ESG Plan 2024-2026, the Group intends to calculate the **Water Footprint** of the entire organisation in 2026. The Water Footprint is an environmental indicator that measures the water used throughout the value chain. The Group expects to have a better and more detailed understanding of the use and consumption of water in its centres and processes, to identify opportunities for water efficiency improvements so that more effective water saving, and efficiency targets and measures can be implemented.

4.1.3   Circular economy and ecodesing

Indra Group wants to be a fundamental player in its clients' climate and environmental transition. The Group therefore foster the development of technologies and products with a positive impact on the environment and apply the principles of circular economy and eco-design to our products. To achieve this goal, Indra Group is committed to:

- Encourage the development of innovative technology that contributes to responding to society's environmental challenges through solutions for sustainable mobility, energy transition or digitization, etc.

- Apply the circular economy and eco-design principles to products and services, taking into account, among others, energy consumption, the use of raw materials and materials, the increase in the use of secondary resources, recyclability and the life cycle of the product.

- Reduce the use of Substances of Very High Concern (SVHCs) to the absolute minimum wherever possible, guaranteeing material traceability, personal safety, and environmental protection.

As a high value-add tech company, the Indra Group offers a wide range of proprietary solutions. The solutions it provides are products composed principally of hardware and electronics.

Indra Group's solutions contribute to the circular economy by embodying the following principles:

|	
Durability	Products are designed for a long service life of 10 to 20 years and are highly reusable, upgradeable and repairable.
Recycling	Solutions are primarily made up of hardware and electronics that can be easily recovered at the end of service life.
Hazardous chemical	Use materials that reduce hazardous chemical substances as long as they meet the technical requirements.
Energy efficiency	Increasing energy efficiency and reducing the company's carbon footprint

Eco-design

The eco-design target is to minimise environmental impact throughout the useful life of products by incorporating environmental criteria at the design stage. Eco-design covers the circular design of the Group's products, with particular focus on durability and optimising higher rates of repair, reuse and recycling.

Indra Group has outlined a course of action in the 2024–2026 ESG Plan to **promote the circular economy** by setting eco-design requirements for all new products. The objective is to establish eco-design requirements for all new hardware products that are to be designed by the Group from 2026 onwards.

In order to achieve its goal, the Group has established three lines of action:

- Incrementally adapting group's engineering and development tools and procedures to the principles of eco-design.
- Training to engineering and development professionals in eco-design.
- Eco-design requirements will be incrementally incorporated for suppliers.

Before incorporating eco-design and circular economy principles into its products, the Group has to ensure that all of its workforce have the necessary knowledge to apply them. By 2024, 77.6% of design and product development engineers had been trained in eco-design.
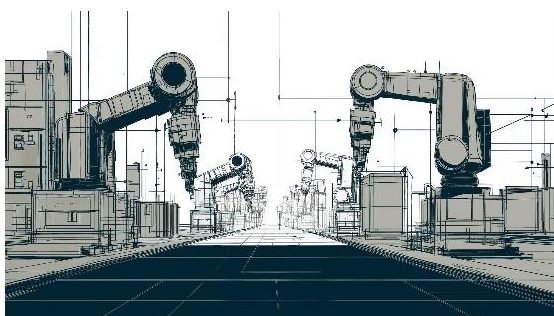
In 2023, a multidisciplinary Indra Group's team of experts successfully completed a pilot project to trial the use of eco-design principles, involving one of the primary surveillance radars used in air traffic management (PSR2D NEO).

Refer to 2024 Sustainability Report chapter 4. ESRS E5. Resource use and circular economy for comprehensive details on Indra Group's circular economy and eco-design strategy and performance.

4.1.4 Waste

Indra Group is committed to the circular economy and to recycling and/or reusing all waste generated by the group.

As part of its principles for action, the Sustainability Policy sets out a commitment to combat climate change and protect the environment by "incorporating circular economy principles through rational use of resources and responsible management of waste and products at the end of their useful life".

This commitment is reflected in the Environmental and Energy Policy, which develops the Group's specific principles for action related to resource use and the circular economy within the framework of the circular economy, eco-design and proper waste management.

Non-hazardous waste	
	97%
Hazardous waste	
	3%

In its principles for action, the Environmental and Energy Policy specifically addresses the following matters :

- Waste hierarchy: to apply the waste hierarchy, that prioritises actions to prevent waste and the environmental impact associated with waste management strategies, within the framework of responsible waste management by applying the waste hierarchy in waste management, prioritising prevention, the preparation for reuse, recycling and other forms of recovery over disposal or landfilling.

- Avoiding and minimising waste: minimising waste generation by prioritising the strategies of reduction and reuse over waste disposal.

Waste generation is monitored by the Environment Department using the Group's **Environmental Management System**, which tracks the hazardous and non-hazardous waste generated and the waste treatment type (recycling, incineration, landfill, etc.).

89% of the waste generated by Indra Group is recycled

As part of the Environmental Management System, the Group conducts internal and external audits of waste management at certified centres. Based on the results of audits and monitoring waste generation, the Indra Group establishes objectives for minimising, segregating, and recycling waste, in addition to implementing action plans to improve waste management and make investments in the centres.

All hazardous and non-hazardous waste is handled by authorised waste managers in compliance with the local environmental legislation applicable in each area. Indra Group aims to recover all its waste and, where possible, retrieve and recycle as much of it as possible. As such, the Group prioritises the hiring of local waste managers to maximise the proportion of waste recovered and recycled.

WEEE Recycling

Indra Group has outlined a course of action in the 2024–2026 ESG Plan to promote the circular economy by improving the recycling of waste from electrical and electronical equipment (WEEE).

As a technology company, WEEE accounts for 23%* of the hazardous waste generated by the Group. This waste has high levels of recovery and categorisation rates, so correct management significantly reduces its environmental impact.

The key actions are as follows:

- Establish minimum waste recovery percentages in contracts with managers of WEEE.
- Establish measures to segregate waste correctly at source and thus guarantee its correct treatment.
- Improve waste traceability in main geographic areas where this type of waste is generated to enable waste recovery.

Indra Group's target is to achieve a recycling rate of 90% for WEEE in Spain. The WEEE recycling rate in Spain was 89% in 2024.

[*] WEEE that was produced in 2024 as a percentage of the total hazardous waste that the Group produced in 2024.

Refer to 2024 Sustainability Report chapter 4. ESRS E5. Resource use and circular economy for comprehensive details on Indra Group's circular waste management and performance.

4.1.5   Pollution

Indra Group is committed to preventing, minimizing and mitigating its impact on the environment. To this end, the Group incorporates the necessary measures for pollution prevention with a view to guaranteeing environment and biodiversity protection. The Indra Group is committed to:

- Mitigate the negative effects related to air, water and soil pollution by applying the principles of precaution and prevention to both avoid and reduce pollution.

- Establish the necessary measures to avoid incidents and emergency situations that cause pollution and, in the event that they do occur, control and limit their impact on people and the environment.

Indra Group's impact on soil, water and groundwater contamination has not been judged to be material.

In order to identify potential environmental and pollution impacts and assess their significance, the Group has carried out an analysis of its sites and activities. Particular consideration was given to the location of the Indra Group's industrial sites, since these are the Group's only sites that may pose a risk of pollution, due to the type of activity pursued.

The conclusions of the analysis are detailed below:

- **Possible sources of atmospheric pollution from on-site combustion.** In terms of atmospheric pollution, most of the sites do not exceed the minimum thresholds triggering the application of specific pollution regulations. At the five sites that do, Indra Group has secured the relevant authorisations, and periodic inspections are carried out. Given the nature of the Group's work, it does not use any ozone-depleting substances (ODSs), nor does it produce any significant emissions of polluting gases, such as sulphur dioxide (SOx), nitrogen oxides (NOx), emissions of volatile organic compounds (VOC) or particulates.

- **Possible cases of soil contamination due to spillage or accidental leaks of stored materials and substances.** In terms of soil, only two sites have been singled out as potential contaminators. However, they have an environmental management system in place to prevent such contamination, are ISO 14001 certified and have emergency response procedures in place.

- **Analysis of the types of water discharged by the Group,** by type of consumption and discharge, as well as the location of the sites. Lastly, the Group also concluded that pollution from wastewater discharges is not material due to the Group's main use of water (human consumption) and given where its sites are mainly located (urban and industrial settings).

- **Analysis of the impact of direct pollution from primary microplastics and the use of products to prevent indirect microplastic pollution.** The Indra Group's activities do not cause direct pollution from primary microplastics, and the measures set in place on plastic recycling and the use of products prevent indirect microplastic pollution.

- **Analysis of the use of substances of concern and substances of very high concern** in Indra Group products, as well as compliance with the REACH Regulation[7]. In the Group's products, these substances are not intended to be released under normal conditions of use, nor are they to be found in such products in total volumes exceeding one tonne a year. The Group also informs its customers of any products containing substances of concern in a concentration of more than 0.1% in terms of weight.

- In terms **noise and light pollution,** Indra Group defines and carries out the relevant regular controls at all its facilities, in compliance with current regulations. Given the Group's activity, none of the sources defined have been significant, either by type or operational hours. The noise levels have also been measured by the Authorised Monitoring Bodies, which have determined that the noise levels outside the certified facilities are below the legal limits. Given the activity of the Group, the impact of light and noise pollution is not considered to be significant.

Indra Group is insured against the occurrence of environmental risks. The main corporate insurance policies with environmental coverage currently held by Indra are Environmental Liability Insurance. And Liability Coverage for Sudden and Accidental Pollution, included in the Group's general liability policy.

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[7] Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), establishing a European Chemicals Agency, amending Directive 1999/45/EC and repealing Council Regulation (EEC) No 793/93 and Commission Regulation (EC) No 1488/94 as well as Council Directive 76/769/EEC and Commission Directives 91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC.

4.1.6 Biodiversity

Biodiversity was not considered material for the Indra Group since its sites are located in urban and industrial areas equipped for such purpose, where they pose no threat to biodiversity. They are also located away from specially protected biodiversity areas such as Red Natura 2000.

Indra Group's land use is not intensive. and its contribution to land degradation is therefore limited. This is due to the fact that the Group operates primarily in the IT and hardware manufacturing sectors and most of its sites are located in urban and industrial areas. The reduction of workplaces as part of the space optimisation plan, which aims at adapting locations to the Group's current and future space requirements, also has a positive impact on land use.

Nevertheless. the Group commits in its Environmental and Energy Policy to:

- Protect biodiversity and natural spaces directly in their operations and by addressing factors that contribute to the loss of biodiversity that are relevant to the organization. such as climate change.

- Establish the necessary measures to minimize the impact on biodiversity and natural spaces in the locations or oppressions that are carried out in zones or areas close to zones of value for biodiversity or protected areas.

4.2 Climate Change

In line with the **Paris Agreement**, Indra Group has embraced a commitment to fighting climate change in its **Environmental and Energy Policy**. This commitment will drive the Group towards transitioning to a low-carbon economy by effectively managing physical and transition risks, and by promoting adaptation and opportunities.

In order to achieve its commitment, the Group is committed to:

- Extend this commitment to all areas of the Group's activity and third parties' agreements.

- Fostering the transition toward a low-carbon Group through an ambitious and realistic transition plan, thus mitigating the effects of climate change.

- Manage greenhouse gas (GHG) emissions and minimize emissions from the group's activity throughout the value chain to the closest level to zero technically possible, absorbing the remaining emissions through carbon removal and storage.

- Establish and review objectives for reducing emissions in the short, medium and long term based on science (SBT) and aligned with the objectives of the Paris Agreement to achieve carbon neutrality by the year 2040.

- Integrate climate change, physical and transition risks and opportunities of climate change into climate governance and into group's risks and opportunities management.

Climate Change governance

At Indra Group, the **Board of Directors** is the highest and most important body responsible for Climate Change governance and supervision of the group's sustainability management, including the climate strategy.

To this end, in December 2019 the Board of Directors approved the creation of a Sustainability Committee which reports to the Board of Directors. The **Sustainability Committee** aims to tackle the climate challenges that arise over the coming years and facilitates the inclusion of climate related criteria as part of the decision-making process of the Group. It centralizes and oversees the performance of key indicators, as well as the management of climate-related risks and opportunities. Its functions include tracking the ESG Plan progress, designing the ambitious emissions reduction roadmap for the Group, and supervising the objectives and principles of the Sustainability Policy.

The management of climate matters is under the direction of the **Chief Strategy Officer** who belongs to the Management Committee and regularly reports to the Sustainability Committee and the Board on the policies, the main risks and opportunities and the Group's performance and objectives in this area.

All aspects related to Climate Change are fully integrated into the Group's strategy through the initiatives defined within the framework of the **ESG Plan 2024-2026**, which has a specific pillar of Planet and climate action. The Group's new Strategic Plan 2024-2026 has integrated these aspects into the cross-cutting Sustainability pillar.

The **Corporate Sustainability Unit** contributes to set the emissions and renewable energy targets in collaboration with other corporate units and defines the actions needed to meet the targets set and coordinates the monitoring procedures. The Sustainability Unit oversees the implementation of the initiatives included in the ESG Plan and monitors the progress of the KPIs set, planning corrective actions if needed. Close cooperation is established with the corporate units that have more impact in the achievement of the emission reduction targets of the Grpup.

4.2.1   Decarbonization roadmap

Indra Group recognises the agreements reached at the Climate Summit in Paris in 2015 and intends to be an active agent in this collective effort to reduce the impact of climate change.

To fulfil this commitment, in 2020, the Sustainability Committee approved a roadmap for reducing emissions, setting targets based on the science for 2030 and 2040, with the intention of achieving carbon neutrality in 2050 as reflected in the 2020-2023 Sustainability Master Plan.

Considering the strong performance in terms of achieving its targets, Indra Group has decided to accelerate its decarbonisation pathway and set new and more ambitious targets. This new pathway was approved by the Sustainability Committee in January 2024 and the associated targets are validated of the Science Based Target initiative (SBTi) in March 2025.

The decarbonisation pathway – in line with the Paris Agreement goal of limiting global warming to 1.5ºC – aims to achieve **net-zero emissions** throughout the Group's value chain by 2040.

> Indra Group aims to be net-zero emissions throughout the Group's value chain by 2040

Based on this strategic ambition, the Indra Group has developed a **Transition Plan** which sets out the targets, levers and planned actions for the short, medium and long term for Scopes 1, 2 and 3, covering the Group's own operations and its value chain.

GHG emission reduction targets

The Group has set itself the target of achieving net-zero emissions throughout its value chain by 2040, establishing intermediate targets to be met by 2026 and 2030 for Scopes 1, 2 and 3, covering the Group's own operations and its value chain. These targets are as follows:
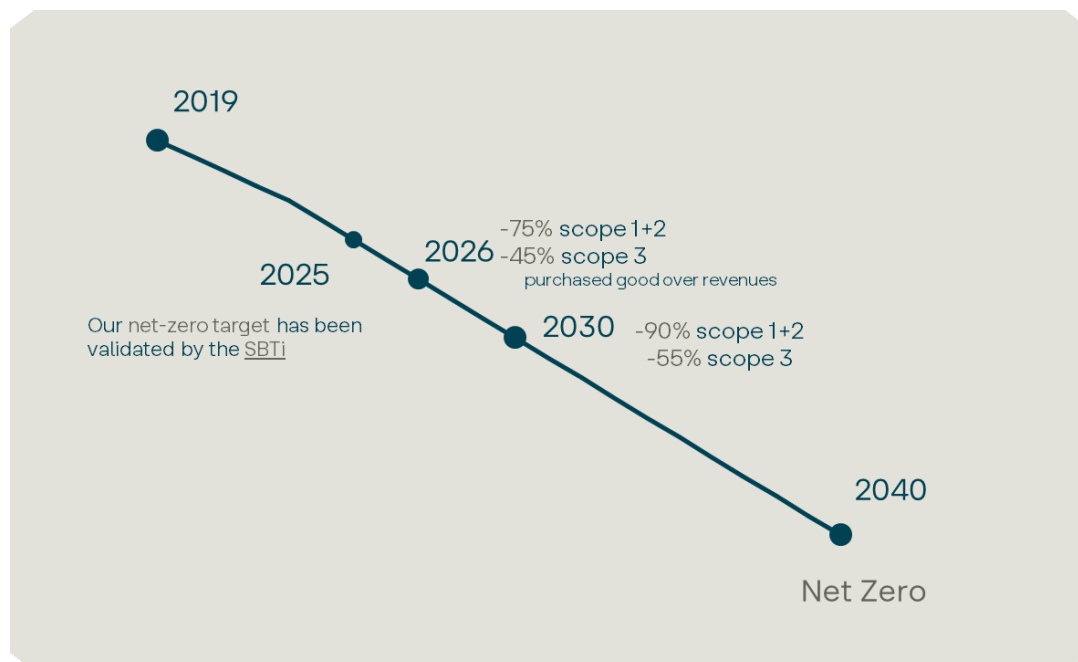
Indra Group's emission reduction targets were set using the Net-Zero Standard, developed by the Science Based Targets initiative (SBTi), in line with the 1.5ºC COP26 commitments. In March 2025, SBTi conducted a validation of the objectives, and these can be found on the SBTi website.

Levers and Action Plan for decarbonization

Indra Group's objective is to minimise the emissions derived from its activities throughout the value chain and to promote efficient energy use in its own operations.

In its Transition Plan, the Indra Group sets out the actions required to fulfil its pledge to fight climate change and to decarbonise its operations and value chain, in line with the Paris Agreement goal to limit global warming to 1.5ºC.

Scope 1 emissions reduction
2024 vs.2019

-33%

Scope 2 emissions reduction
2024 vs.2019

-87%

Five levers for key areas have been identified for addressing the Group's emissions sources:

Energy efficiency

Reduction of emissions through measures to reduce energy consumption at the Group's sites.

Renewable energy

Reduction of emissions through the use of renewable energy, selfgeneration and the gradual phasing out of fossil fuel energy sources.

Environmental requirements established for operations

Reducing emissions by incorporating environmental requirements when contracting suppliers, business partners and other partners and obtaining actual emissions data from these companies.

Ecodesign

Reduction of emissions from the Group's products by incorporating ecodesign requirements in the design of products and services..

Sustainable mobility

Reduction of emissions from employee mobility by promoting low-emission mobility.

Short-term actions are detailed in the 2024–2026 ESG Plan, which encompasses initiatives on material matters for the Group in terms of decarbonisation and climate change within the Planet and climate action, and the responsible products and services focus areas. Medium and long-term actions, as well as additional short-term actions necessary to achieve the emission reduction targets, are detailed in the Transition Plan.

GHG Emissions

To monitor its Transition Plan and decarbonisation targets, the Indra Group takes an inventory of its GHG emissions across the value chain encompassing Scope 1, 2 and 3. The results of the Group's GHG emissions calculation for 2024 are detailed below:

GHG Emissions (absolute emissions)	2019	2023	2024	2024 vs 2019	2024 vs 2023
Scope 1. Direct emissions	2,733	2,035	1,831	-33%	-10%
Scope 2. Indirect emissions (market-based)	6,198	1,182	832	-87%	-30%
Scope 1 +2	8931	3,217	2,663	-70%	-17%
Scope 3. Indirect emissions	507,063	430,129	446,357	-12%	4%
Total GHG Emissions (tCO2e)	515,994	433,346	449,019	-13%	4%

GHG Emissions (Intensity emissions)	2019	2023	2024	2024 vs 2019	2024 vs 2023
Scope 1. Direct emissions	1.30	0.71	0.58	-55%	-19%
Scope 2. Indirect emissions (market-based)	2.95	0.41	0.26	-91%	-36%
Scope 1 +2	4,25	1,12	0,84	-80%	-25%
Scope 3. Indirect emissions	241	151	141	-41%	-6%
Total GHG Emissions (tCO2e / M€)	245.25	152.08	141.22	-42%	-6%

Note: Emission intensity calculated as the CO2e equivalent emissions of the Group divided by million EUR Operating Profit.

Refer to 2024 Sustainability Report chapter 3. ESRS E1. Climate change for comprehensive details on Indra Group's climate change strategy and performance.

5 Social

5.1 Employees

Indra Group recognises that its own workforce constitutes a key group of stakeholders that has a significant bearing on its strategy and business model.

To ensure that their rights are respected and that their interests help inform the Group's activities, the following commitments have been set out in the Sustainability Policy as a reference framework for the effective integration of environmental, social and governance (ESG) matters within the Indra Group's decision-making process to:

- Provide a working environment conducive to the integration and development of all employees, respect, the combating of discrimination of all types, the promotion of diversity and equal opportunities in the form of initiatives to help strike a better work-life balance and the integration of groups at risk of exclusion.

- Create open, dynamic and flexible working environments that drive creativity and innovation as one of the cornerstones of the Group's strategy and business model.

- Promote stable employment for its own workforce, thus contributing to their financial well-being.

- Safeguard the health, safety and well-being of the Group's own workforce, especially in potentially high-impact areas within the sector.

- Advance and broaden the communication channels between the Group and its own workforce.

- Guarantee the rights of its own workforce to social dialogue and collective bargaining.

- Ensure, thanks to awareness-raising and training initiatives, that the Group's workforce is equipped with the skills and know-how it needs to apply its sustainability policies and management systems, helping to ensure that the ESG goals are met.

The Group's own workforce is a core feature of its 2024–2026 Leading the Future Strategic Plan, and lies behind one of its long-term strategic guidelines. As a technology company the Indra Group's workforce is renowned for its high level of professional expertise and STEM qualifications (Science, Technology, Engineering and Mathematics). The Indra Group therefore places great emphasis on managing culture and diversity to improve the commitment and retention of its own workforce.

Indra Group's talent management strategy is split into five core areas: diversity and inclusion, attracting talent, professional development, employee commitment, health and safety.
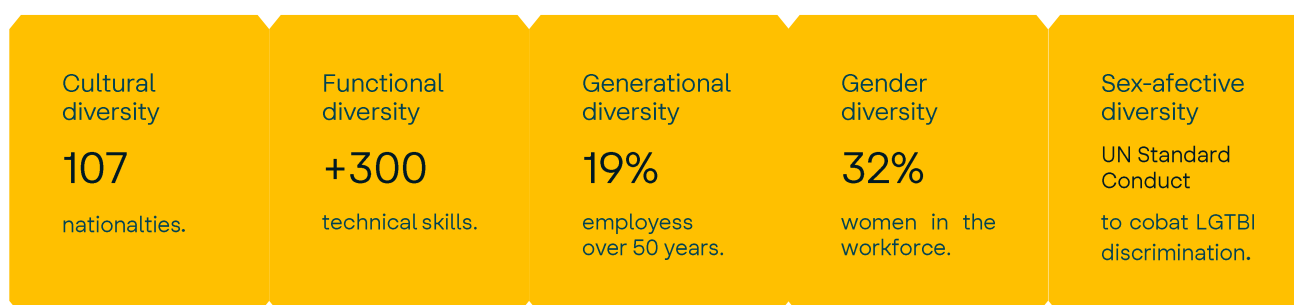
5.1.1 Diversity and inclusion

Diversity is key to Indra Group's culture, and an element that defines the Group's talent management framework. Equal opportunities, diversity, respect and non-discrimination are fundamental principles present throughout all aspects of the professional career of anyone who forms part of Indra: in attracting the best talent, in professional development, in acknowledging the effort of employees, in matters relating to well-being and in terms of how people relate with the world around them.

At Indra Group, people are at the heart of everything we do, and that's why we embrace teams made up of people with a diverse range of profiles, free from labels or limitations.

Diversity is a very broad concept, covering both the visible (age, gender, ethnicity, certain disabilities), and less tangible, or even invisible differences, such as those of personal skills, working styles, education, experience, religion, moral values, sexual orientation, and perspectives or beliefs. These differences have a profound impact on the way Indra Group works.
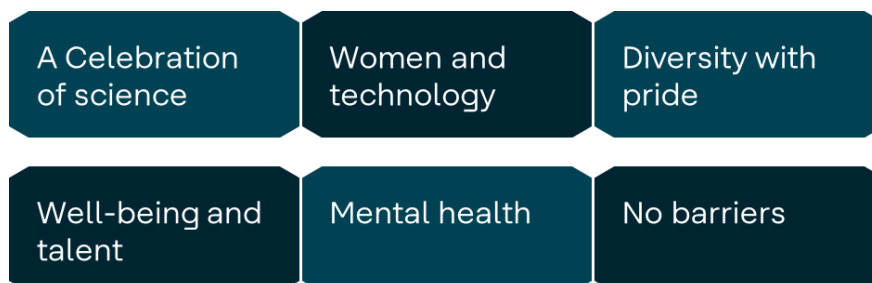
Cultural diversity	Functional diversity	Generational diversity	Gender diversity	Sex-afective diversity
107	**+300**	**19%**	**32%**	UN Standard Conduct
nationalties.	technical skills.	employess over 50 years.	women in the workforce.	to cobat LGTBI discrimination.

Indra Group's Diversity Policy seeks to prevent, mitigate and remediate impacts relating to discrimination on the grounds of gender, age, culture, sexual orientation, disability or other relevant forms of discrimination, as well as to address employment disputes deriving from unconscious biases or non-inclusive conduct.

The Diversity Policy comprises a set of guidelines and commitments established by the Indra Group to recognise and value individual differences, nurturing an environment of respect and empowerment for its own workforce through equal opportunities and collaboration among diverse talents.

To promote equal opportunities and inclusion across all levels of the organization.

To foster a respectful and non-discriminatory work environment.

To raise awareness and train the Indra Group's own workforce on the importance of diversity and inclusion.

To ensure a work-life balance of the Group's own workforce.

To champion internal mobility and continuing professional development.

To value and recognise individual contributions, enhancing the overall well-being of service providers.

To give effect to these commitments, the Group employs an integral approach based on the five key dimensions of diversity: gender, ethnic heritage, sexual orientation, age and disability. The strategy takes the form of bi-monthly campaigns, addressing six specific causes over the course of the year and taking a deep dive into each of these aspects:

A Celebration of science	Women and technology	Diversity with pride
Well-being and talent	Mental health	No barriers

Gender diversity

Indra Group is particularly committed to promoting gender equality. The Group encourage the presence of women at all levels, developing programs to ensure that there is an increasing female representation in our staff and also at management level.

Indra Group also works on policies that favor work-life balance, equal opportunities in the selection processes and that are free of gender bias. Our goal is to ensure the presence of female talent at all levels of the organization and to reach 30% of women in leadership and management by 2030.

Indra Group's Gender Diversity Program establishes procedures in all areas that ensure meritocracy to guarantee equal opportunities for all professionals, not only for access to management positions, but from recruitment to training, development and career progression.

01.
Inclusive culture

Foster a culture in which it is perceived as a value to have different sensitivities and abilities, overcoming prejudices and stereotypes.

02.
Meritocracy

To have procedures in place to ensure meritocracy.

03.
Empowerment

Support women to break down the social barriers that may exist, but also those that they may impose on themselves.

Commitments to eliminate discrimination

Indra Group has in place the following policies aimed at eliminating the grounds for discrimination in respect of racial origin and ethnicity, colour, gender, sexual orientation, gender identity, disability, age, religion, political views, nationality or social origin or any other form of discrimination envisaged in European or domestic legislation.

The various Indra Group policies that include commitments aimed at eliminating discrimination and promoting equal opportunities and other means of furthering diversity and inclusion are:

- Human Rights Policy
- Diversity Policy
- Code of Ethics and Legal Compliance
- Equality Plans
- Protocol on Harassment and Gender-Based Harassment
- Protocol on Moral Harassment

- Protocol on Unacceptable Behaviour

- Modern Slavery and Human Trafficking Statement

In addition to the policies referred to above, a letter of undertaking has been signed by the Indra Group's Global Director of Human Resources, setting out a **commitment to equality as one of the Group's cores, cross-cutting principles**. This letter testifies to a commitment to all aspects of work-life balance, setting in place measures that go beyond the statutory provisions, including measures on working hours and leave, in the firm conviction that work-life balance has a pivotal role to play in the well-being of all those who work at the Group.

These policies are enforced in the form of specific procedures to ensure that discrimination is prevented, mitigated and addressed once detected, as well as to promote diversity and inclusion in general.

Furthermore, all Indra Group companies are covered by the same **Code of Ethics and Legal Compliance**, which rejects all forms of harassment and discrimination. All of the Group's employee relations are governed by the **principles of equal opportunity, diversity and respect for others, and no form of discrimination** is tolerated, whether on the grounds of race, gender, religion, disability, sexual orientation, origin, economic position, birth, union membership, or any other personal or social condition or circumstance. The sexual and gender-based harassment protocols are intended to ensure working environments free of sexual and gender-based harassment and detail the procedures for reporting and filing complaints about such behaviour.

The mandatory annual Code of Ethics and Compliance training covers a range of topics, including anti-harassment and anti-discrimination training. Moreover, in 2024, specific training was provided on the **prevention of sexual and gender-based harassment**, covering topics such as awareness of inappropriate conduct and prevention processes, the definition of harassment and its various forms, response procedures, and the Group's protocols for dealing with these situations. This training is available to employees at all times via the online learning portal.

Refer to [2024 Sustainability Report](#) chapter 5. ESRS S1. Own workforce for comprehensive details on Indra Group's diversity performance.

5.1.2 Attracting talent

The complexity and highly specialised nature of the work Indra Group carries out requires multidisciplinary teams with a diverse range of talents and skills. As a result, Indra Group adopts different recruitment strategies depending on the profile of the individual required, with people from STEM backgrounds being most in demand.

Across all geographies, Indra Group seeks to improve its employer brand, as a tool to attract and deepen the commitment of its employees, with a focus on junior and high-value senior profiles.

One of Indra's priorities is to increase the flow of candidates, which it aims to do by making the Group more visible and attractive, defining its missions and values, and increasing the sense of pride belonging to the Group brings its employees.

To do this end, the Group has rolled out series of strategic initiatives to bolster the Group's position as an attractive workplace, ensuring all actions are aligned with its corporate values and the employee value proposition.

Communication and visibility	Launch of integrated communication campaigns on social networks, digital platforms and job portals, showcasing the organisational culture, benefits and professional development opportunities.
	Publication of actual stories from service providers, including testimonies and "a day in the life of" accounts detailing their achievements and experiences in the Group.
	Authentic multimedia content, including videos, photos and blogs, testifying to the Group's diversity, innovative projects and inclusive working environment.
Attracting talent and relationship building	The group has forged robust ties with universities, schools and other educational facilities through conventions, job fairs and mentoring programmes, enabling it to attract the finest young talent.
	The Group takes part in public corporate events, such as open days, hackathons and workshops, enabling potential candidates to get a first-hand insight into its culture.
Candidate feedback	Streamlined, transparent recruitment processes, with constant communication and feedback at every stage, projecting a confident, professional image.
	Systematic gathering of candidate feedback in the form of surveys, enabling recruitment processes to be continuously improved.
Diversity and inclusion	A commitment to diversity and inclusion is visible in everything that the Group does, from public campaigns spotlighting the progress made in equality to partnerships with communities and organisations that champion universal access to opportunities.
	Development of specific initiatives to attract diverse talent, positioning the Group as a model for inclusion and sustainable employment.
Innovation in recruiting	Deployment of inbound recruiting strategies, creating inspiring content to attract the best candidates even before they start actively looking for work.
	Tailored approach to each stage of the recruitment process, analysing data to ensure strategies can be continually optimised.
	Addition of gamified platforms to assessments, ensuring dynamic, attractive processes that reflect a culture of innovation.
Interdepartmental collaboration	Close collaboration with the company's various departments (Marketing and Communication, HR, Labour Relations, etc.) to ensure that the employer brand is fully aligned with the Group's global strategy.
	Spotlighting of progress made in sustainability, innovation and social responsibility, drawing a direct parallel with the values that attract and retain talent.

Refer to 2024 Sustainability Report chapter 5. ESRS S1. Own workforce for comprehensive details on Indra Group's attracting talent strategy.

5.1.3   Professional development

Indra Group's talent strategy is focused on three main processes: career models adapted to the needs of the businesses and corporate areas; the ongoing and multi-sourced assessment of employee career plans; and open and continuous learning programmes that incorporate new trends in methodologies and content.

Professional development

Talent Development and Career Planning

Talent is the key differentiating factor for Indra Group and the driving force behind its competitive advantages. Managing and developing talent is therefore essential to achieving group's innovation, growth and internationalization targets.

Therefore, Indra Group has developed a **professional development model** to maximize employees' potential, responding to the different talent needs in the business.

The management model for individuals is based on differentiation, with an individual approach taken for each employee based on their contributions, potential and interests, seeking the **optimal development of each individual working at the group.**

The Model establishes the different paths can be followed to develop professional career within the group: the career plans. Each Business Unit has different career plans which are tailored to the role and level of experience of the professionals.

The Talent Department draws up an annual monitoring plan to continuously track all processes. The talent development framework is available to all workers on the Indra Group Intranet.

Development and leadership programmes

Smart Start: a programme aimed at accelerating the development of young talent

The objective of Smart Start is to foster the development of young people within the Group. In order to achieve this, the programme offers new professionals in junior positions comprehensive support, which includes mentoring for the first 100 days; a welcome Talent Camp, covering Group culture, policies and processes; a two-year training programme to develop basic competencies and skills, such as teamwork and innovation; a professional development plan with half-yearly performance evaluations and performance-based financial incentives; and continuous feedback from surveys and focus groups provided throughout.

In 2024, 1,233 Minsait professionals took part in Smart Start.

- Contribution to professional development: Smart Start helps create a different employee experience, improves employee integration, and contributes to their professional development within the Group. It starts from the premise that when young people feel motivated at work, the learning curve is less steep, and they are able to more quickly acquire the competencies and skills that will help them in their professional development.
- Contribution to the Group: Smart Start aims to reduce unwanted turnover among junior employees, increase their level of commitment, reduce the generation gap between junior staff and management, and attract more people with qualifications in technological fields.

Since the programme's launch, junior staff commitment and productivity levels have improved significantly, and turnover is down. In 2024, turnover among Smart Start participants was 15%, which compares very favourably with overall turnover among those under 30 (37%). The programme has also helped increase efficiency and innovation and improve communication between departments.

STAR Programme: High Potential.

The Star programme was established with the objective of enhancing the Indra Group's key talent. The programme, designed to manage and promote individuals identified as high potential, aims to continue developing them in accordance with their expectations and needs.

The programme provides support for professionals in four major areas: Development, Learning, Engagement and Visibility. Initiatives include Self Awareness, Mentoring, leadership training, participation in events and inspirational and talent talks.

As of 2025, 815 professionals are participating in the programme.

- Contribution to professional development: The Star programme has been developed to support personal and professional growth by enhancing the skills and competencies of its participants. It allows participants to gain insight into their personal development and to receive guidance from key figures, thereby facilitating their growth. The programme is designed around the dimensions of the leadership model to promote learning and development. It creates unique spaces that give visibility and guide participants in enhancing their career by connecting them with relevant individuals within the Group. Additionally, it fosters interaction with other professionals, establishing a network of contacts.
- Contribution to the Group: the programme has been meticulously designed to equip professionals with the necessary skills to fulfil key roles within the Group and to facilitate their ongoing development, ensuring they reach optimal levels of excellence. The Group's objective is to enhance engagement and reduce turnover among high-potential professionals.

Lean Making: instilling a culture of efficiency and digital adaptation among employees

The objective of Lean Making is to increase Minsait's efficiency and productivity.

The programme, among others, aims to reshape employee culture and develop their skills, offering improvements in areas such as workflow and time management.

In 2024, Lean Making provided more than 10,000 Minsait professionals with training.

- Contribution to professional development: Employees who take part in the Lean Making programme build a more solid base on which to develop their skills, allowing them to take on new professional challenges. In particular, the programme aims to encourage professionals to make better use of transferable digital skills (Lean Making Belt) in order to improve time management and the quality and efficiency of their work. The programme also helps retrain employees specialising in obsolete or discontinued technologies, offering them courses to update their skills and redirect their career path. As a result, employees are able to make progress in their professional development and increase their employability.
- Contribution to the Group: Lean Making helps improve Minsait's operational efficiency, reducing costs and increasing profitability and the Group's competitiveness. Lean Making Belt training events have helped reduce Minsait's costs by almost €12 million since the programme's launch in 2017.

Mentoring and coaching programmes

Indra Group offers coaching and mentoring programmes as part of its professional development initiatives, providing a valuable resource to help its employees achieve excellence.

The Coaching Programme, in 2024 which 194 professionals participate, supports the achievement of professional objectives by providing a tool for personal and professional growth that is aligned with the Group's leadership model. Organised into three phases — Objectives, Development and Feedback — the programme helps participants to achieve their objectives with the support of a coach, who will guide them throughout the process using a proven methodology.

As part of the Star Programme, a mentoring programme has been developed to support the development of all participants under the guidance of a mentor. This process provides guidance and support to help High Potentials develop their skills and achieve their objectives.

<u>Assessment model</u>

At Indra Group, talent management is based on the Performance Experience assessment model which uses various tools and processes to evaluate performance, the achievement of objectives and professional development.

This assessment model allows employee performance to be tracked using a number of different sources of information in a personalised, comprehensive, continuous and responsive way that is tailored to each division, and which maximises employees' professional growth and development, by:

> Evaluation of employees' individual growth and development.
>
> Design of an ongoing monitoring and feedback policy with a view to improving employee performance.
>
> Establishment of individual action plans for employee growth, identifying the skills to be developed and the necessary training.
>
> Optimal management of employees by functional managers, building on their individual strengths and identifying areas for improvement.
>
> Identification of high-potential individuals in order to design programmes and tools to accompany and help them in their professional development.

Indra Group's continuous assessment model consists of the following:

Performance Talent	Regular review (annual or biannual) conducted by line managers of employee performance and progress as this relates to that individual's career development plan and position in order to identify the next steps needed for their professional growth.
Performance Project	Providing feedback on the performance of each professional in the projects in which they participate. It enables project managers to provide more frequent, immediate and detailed feedback on day-to-day performance.
Performance Goals	Measures to what extent employees receiving variable remuneration have met their targets, both individual and team or departmental objectives, used to incentivise them to achieve the desired economic, strategic and commercial results of each management unit[8].
360° Feedback	An employee's managers, co-workers and peers provide feedback on their professional development, evaluating their performance and skills displayed in their role. It is aimed at individuals who are at a point in their professional career where they are likely to gain the most from it, this being of particular relevance for the Management team.
Young Talent	Younger workers taking part in the Smart Start programme benefit from half-yearly evaluations from the moment they join the Group right through to when they complete the programme.

93% of employees have the opportunity to take part in multi-dimensional assessments, which offer an opportunity for various evaluators to provide an all-round, objective view of the employee's performance.

Refer to 2024 Sustainability Report chapter 5. ESRS S1. Own workforce for comprehensive details on Indra Group's professional development performance.

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[8] Performance Goal assessment model only applies to professionals with variable remuneration.

Learning Model

Indra Group has a **Learning Model** that aims to empower professionals so that they can play a leading role in their development, responding to the needs of each professional.

This model has been developed to guarantee a training offer that allows the acquisition of knowledge, competences and attitudes necessary for the adequate performance of professionals in their jobs, as well as the qualification to assume future responsibilities (changes in projects, responsibilities, technologies, clients, etc.).

The Learning Model developed by the Indra Group establishes the guidelines and strategies for developing the competencies and skills of its own professional, supporting professionals to respond to current and future needs and developing existing talent.

The overall Learning Model is global in nature, while catering for the particular features of their activity or segment or the geographic area in which they perform their functions. At a global level, Indra Group professionals have training proposals associated with project and career needs. These proposals form part of a learning environment in which the professional and his or her manager play a fundamental role and whose objective is to promote professional growth and align individual objectives with professional development within Indra Group.

Indra Group constantly tracks the levels of participation in the different training dimensions, enabling it to monitor how effective its training model (policy) and learning programmes are.

Thanks to the actions taken, the targets set in the 2024–2026 ESG Plan can be met, ensuring that all employees are trained in the key skills, tools and expertise they need to perform their functions safely and efficiently. By focusing on the individual, this approach encourages career development and the efficient use of essential technologies and tools for their work.

The Learning Model is structured around **four major dimensions**, each of which has different, carefully timed actions:

Business Learning

How we prepare for future challenges and respond to project needs.

Data Cloud programme (employee upskilling and certification in AWS, Google, Microsoft, RedHat, Oracle…).

Operational Excellence Programme (training operational managers in how to attain excellence).

Culture and values

Our shared ways of doing things.

Regulatory compliance

Information security

Eco-design

Prevention of harassment

Diversity

Growing Together

Programmes that accompany professionals as they hit career milestones.

Developed in collaboration with the most prestigious business schools. They are designed to support professionals at key points in their careers and to consolidate Indra Group's leadership model.

Junior programmes: Smart Start and HiCo.

New Manager and New Director Program.

Open Learning

Self-learning and high-value content on various "open-access".

Learning methods and content broken down by technology (Agile, PMP, IA, Python, .Net, Java, AWS, Google, Microsoft, Methodologies, etc.), skills (communication, leadership, mentoring, feedback, etc.), tools (Microsoft, etc.) and languages.

Each dimension helps towards achieving certain goals:

Business Learning	Culture and values	Growing Together	Open Learning
The projects in this training dimension seek to equip employees with the know-how they need to better understand the company's strategic objectives and project tactics	The content delivered in this training dimension aims to make the organisation more aware of critical and regulatory issues	These programmes seek to accompany professionals as they hit career milestones, such as promotion to a critical role or when they first join	A broad range of training tailored to individual needs (technical or methodological, languages, skills, etc.)

Refer to 2024 Sustainability Report chapter 5. ESRS S1. Own workforce for comprehensive details on Indra Group's Learning Model.

5.1.4   Employee commitment

Indra Group is committed to the development of our professionals, guaranteeing respect for labour rights and fostering a culture based on labour well-being.

This commitment is supported by the six universal principles on which the employee experience is founded: flexibility, work-life balance, diversity, health and well-being, responsiveness, and proactive action.

Remuneration adjusted to employee needs

Indra Group's objective is to offer competitive remuneration adapted to the diversity of its talent and to the markets and geographies where the Group operates.

Indra Group's compensation package includes a fixed salary determined in such a way as to ensure both internal and external equity taking into account the competitiveness of the market wherever its teams are based. Furthermore, professionals are offered a variety of social benefits, which can vary between the different Group companies; and a system of variable remuneration payable.

Social benefits

Indra Group offers employees a wide range of benefits, with different benefits provided to different groups depending on each country's policies and market practices.

Physical and mental well-being	Health insurance; life insurance in case of death or disability. Apps providing flexible access to gyms, fitness studios, classes and workouts, and wellness apps. Online counselling service; physiotherapist service. Canteens and vending machines offering healthy food.
Financial well-being	Flexible remuneration[9]. Products offered include health insurance, meal cards, transportation cards, childcare vouchers, training, retirement savings insurance, social provision schemes, purchase of group's shares and car leasing. Employee discount apps. Programmes that promote work-life balance and reconciliation between personal, family and working life. Legal assistance and domestic services; exclusive access to virtual banking.
Benefits for professional development	Career development plans involving international projects, internal mobility, and vertical and horizontal growth. Free or part-funded training; collaborative projects and creation of a pleasant working environment. Internal and international mobility (competitive expatriate policies).

All benefits typically vary depending on an individual's personal situation and what stage of the employee life cycle or point in their professional career they are in, and help manage employee compensation and build greater loyalty.

In Spain, the flexible remuneration plan (ReFlex Plan) allows all professionals to allocate part of their remuneration to the products and services mentioned above, benefiting from both special conditions and tax advantages. In 2024, 42% of the workforce in Spain took advantage of this plan. In other geographies, social benefits vary depending on the Group (e.g. insurance, restaurant vouchers and company cars).

Variable remuneration system

Indra Group' system of variable remuneration payable to 19% of employees. This system aims to encourage achievement of the objectives set out in the Performance Experience model.

In terms of medium-term remuneration, to ensure the sustainability of the business, 33% of managers have medium and long-term targets that are tied to the Group's strategic objectives being achieved. In the IT business, 40% of the total variable remuneration paid to managers is tied to qualitative objectives, while this percentage is 20% in Defence, ATM and Mobility.

10% of the medium-term variable remuneration paid to senior management is tied to ESG targets.

The yearly targets for executive directors, along with the percentage of these targets reached at the end of the financial year, are published in the Annual Report on Director Remuneration.

Refer to 2024 Sustainability Report chapter 1.5.GOV-3. Integration of sustainability-related performance in incentive schemes for comprehensive details on Indra Group's variable remuneration system.

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[9] Flexible remuneration in Spain and Portugal offered to those eligible in accordance with legislation.

Flexible working and work-life balance

The Group continually assesses and reviews the policies which determine the working conditions of its employees across all the geographies where it operates. Indra Group has had work-life balance measures in place since 2005, which differ in each of the countries where the Group operates. In line with its work-life balance and flexible working policies, Indra Group also respects its employees' right to disconnect from work outside working hours and makes it its goal to comply with the regulatory obligations in terms of internal policies in the various countries where it operates.

For instance, the Group has implemented **specific work-life balance and flexible working policies** in Spain, Italy, Brazil, Colombia, Mexico, Peru, Chile and the Philippines. These include remote working policies where possible, summer working hours, and flexible working hours with adjustable start, end and lunch times. The Group also offers the possibility of adjusting the working day in continuous or split mode.

In line with its work-life balance and flexible working policies, Indra Group also respects its employees' **right to disconnect** from work outside working hours and makes it its goal to comply with the obligations of the applicable legislation.

These **work-life balance measures** are intended to offer a response at different key moments in an employee's working life, such as when they become parents, have to care for family members, or in specific situations such as incidents involving gender-based violence, or when an employee wants to pursue personal goals relating to volunteering or training.

In Spain employees can take extended leave for volunteering work, and request days off to take exams or hours off to accompany a family member or person under their care to a medical appointment. In addition, the Group offers a flexible working arrangement for professionals with dependent family members. This includes the option of paid family care leave and a compressed working day from Monday to Thursday.

In the majority of Indra Group companies in Spain, all measures that apply are set out in its **Equality Plans** that go above and beyond the legal requirements, offering maternity and paternity leave that is longer than legally required, along with improvements in terms of the categories of paid leave.

The Group also offers additional measures relating to flexibility and occupational well-being.

Therefore, certain companies within the group are able to offer remote working arrangements to pregnant employees, in accordance with the provisions outlined in their Equality Plan. Additionally, designated parking spaces are available for pregnant women. The Group also offers childcare provisions as part of its flexible remuneration package, and has agreements in place with nearby childcare facilities.

In several of the work centres, such as in Spain and Colombia, breastfeeding rooms are available to the Group's employees. This measure is available to more than 60% of the Group's workforce.

In addition to Social Security maternity and paternity payments, the Group also offers payments of up to 100% of normal salary applicable as of the first day of leave; nursing leave until the baby is nine months, with parents able to choose who will take the leave and how it will be split and paid maternity or paternity leave, in addition to the legal minimum requirement.

Indra Groups also offers paid leave to anyone returning from maternity or paternity leave after the birth or adoption of a child. The beneficiary can take this leave in the way that best suits their needs: either by (i) extending their parental leave by 15 calendar days, or (ii) halving their working day while still on a full salary for the first 30 calendar days upon their return to work. For this reason, the majority of Group professionals are entitled to 18 weeks of paid parental leave, which is available for both parents.

Labor standards

Indra Group's commitment to its professionals is to promote their professional development, provide them with fair compensation and ensure respect for labour rights.

The Group recognizes the value of people and their work and of the social and natural environment in which we operate. Indra Group also undertakes to respect the principles related to the rights established in the International Labour Organisation Declaration.

Indra Group respects local law on working hours and overtime and fights precariousness of work and controls that there are no excesses in the workday among its employees. To this end since 2019 the Group has a Day Registration Tool in place following the requirements of the 8/2019 Spanish Law.

Furthermore, working calendars are drawn up on an annual basis, incorporating public and paid holidays. In order to ensure compliance with working hours regulations, these calendars are made available to professionals and their legal representatives.

The professionals maintain a record of the time spent on each project, ensuring that all working days, days off and holidays taken are documented. This enables the adjustment of working times to the work schedule and ensures employees are taking their days off and holidays.

Likewise, Indra Group applies the Collective Bargaining Agreements in force at all times in order to guarantee that all the rights set forth in them as a result of collective bargaining are complied with, including those relating to salary tables, which are the ones that set the minimum salaries for each category or professional group.

As reported in the Sustainability Report, the standard starting salary is always well above the local minimum wage for each country in which significant operations are carried out which guarantees a living wage for workers.

All of these commitments are guided by the principles outlined in the Code of Ethics and Legal Compliance and the Indra Group's Human Rights Policy.

Assessing levels of commitment

In order to establish the degree of employee satisfaction with these and other measures implemented in the Group, as well as their degree of commitment, the Indra Group has included the performance of climate surveys of all Group employees in its ESG Plan 2024-2026. The objective is to achieve a positive eNPS (Employee Net Promote Score) in 2026.

Overall, the 2024 independent surveys recorded a 26% participation rate among employees in multiple countries where the Group operates, with an average employee satisfaction rate of 84.5%. Although the participation rate is below par, it signifies valuable contributions from a substantial segment of the workforce and from Indra Group's primary markets and business units.

5.1.5   Health and safety

The health and safety of the Group's professionals is paramount for the Indra Group. For this reason, the Group fosters a culture of prevention in all its activities, with a particular emphasis on those aspects that have a high impact on the sector.

The Group is committed to observing the global principles promoting health, safety and well-being in the workplace. As a right and an obligation of all employees, health and safety in the workplace is a common goal. Employees must work together to identify and eliminate hazards and reduce any unavoidable risks (identification, detection and correction and control).

The **Policy for the Prevention of Work-Related Hazards** contains a set of principles, guidelines and actions established by the Indra Group with the aim of promoting health, safety and well-being in the workplace.

The purpose of the Policy is to reduce the risks that may affect the Group's own workforce, to improve working conditions and comply with the statutory occupational safety provisions. To this end, the Indra Group relies on its Occupational Risk Management System and on the establishment of Prevention Plans on the basis of which the results in terms of occupational health and safety are evaluated through indicators, taking into account the Group's objectives, and priorities and action plans are established to achieve higher levels of health and safety.

Occupational Health and Safety Management System

The Indra Group has an **Occupational Health and Safety Management System** based on and with the fundamental objectives defined in the Policy for the Prevention of Work-Related Hazards, as it ensures compliance with human and labour rights, the well-being and, above all, the health and safety of its own professionals.

The Indra Group holds **ISO 45001 certification** for the health and safety management systems in its main companies in Spain and in the Group's subsidiaries in Italy, Brazil, Colombia, Peru, the United Kingdom and Australia. A total **of 82%**[10] **of the Group's employees in Spain are covered by a certified health and safety management system.**

ISO 45001
(% professional covered by certified system)

65%

OHS Management System
(% professional covered by audited system)

85%

In order to meet the requirements of ISO 45001, the health and safety management system is supported by prevention plans, operating procedures and management standards. These clearly set out duties and responsibilities, relevant policies, targets and indicators, desired results and resources needed. This ensures compliance with local and international health and safety regulations covering all the Group's spheres of activity.

Beyond the strict compliance with its legal obligations in all the geographies where the Indra Group operates, the Group also promotes employee well-being and a culture of prevention across all its operations. Similarly, across all the regions where it operates, the Indra Group looks to offer training, raise awareness and inform its workers about the basic prerequisites in terms of workplace health and safety that are essential for promoting a culture of prevention. The Group is committed to fulfilling its obligations in this matter and achieving continual improvement.

Plan for the Prevention of Work-Related Hazards

The Occupational **Health and Safety Management System** ensures that risks are identified, preventative measures are prioritised and then implemented accordingly, and accidents are tracked and investigated.

By identifying risks, the Group is able to determine the preventative measures that need to be taken and training gaps that must be filled, such as in relation to the use of personal protective equipment or ensuring fitness for work. All prevention action taken is prioritised based on the level of risk.

Once a year, the Indra Group's Work-Related Hazard Prevention Service draws up an **annual plan of preventative measures and training plan.** This plan is then monitored in order to establish the progress made against the setting of goals for the year.

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[10] Note: 65% of the Group's own employees are covered by a Health and Safety Management System certified in accordance with the ISO 45001 standard. This proportion increases to 85% (data as of May 2025) if we consider the Indra Group's own workers are covered by the Group's Occupational Risk Prevention Management System, which is based on RD 39/1997 and audited by AUDELCO (an entity specialised in auditing and certification of management systems) by means of regulatory audits.

- Risk assessments of centres and activities such as psychosocial factors, physical agents, chemical agents, noise, environmental factors, lighting or ergonomics.

- Monitoring of preventative measures deriving from risk assessments.

- Health and Safety training.

- Monitoring of the work-related health of workers in the form of workplace health check-ups

- Conducting regulatory, legal or management system (ISO 45001) audits.

- Prepare for and respond to emergency situations plans and emergency drills.

- Safety inspections.

- Investigations of accidents or incidents.

- Unscheduled risk assessments as a result of an investigation into an accident or incident, changes in working conditions, equipment and/or machinery or specific safety plans.

All technical actions and audits lead to a series of remedies (known as preventative measures in work-related hazard prevention), which can be divided into three groups: organizational - coordination of health and safety related activities-, training - training on specific risks- and technical - safety inspections at industrial sites-.

Indra Group carried out 1,714 technical actions in 2024, leading to 689 preventative measures, of which 254 have been finalized and 430 are in progress. These actions are intended to:

- Reduce work-related accidents.
- Increase health and safety training.
- Ensure workers remain fit-for-work, or fit-for-work with limitations (adapting positions to avoid health check-ups resulting in "unfit-for-work").

Health and safety training and awareness-raising

Indra Group looks to offer training, raise awareness and inform its workers about the basic prerequisites in terms of workplace health and safety that are essential for promoting a culture of prevention and continual improvement.

In Spain, Italy, the United Kingdom, Brazil, Colombia, Peru and Australia, Indra Group has health and safety training programme that runs annually under the framework of the ISO 45001 management system. All group's employees must complete compulsory training on the prevention of work-related hazards, with the content varying slightly for different positions. Due to the nature of certain positions within the Indra Group, the training programme may include courses on specific matters such as risks at height or in confined spaces.

Training campaigns under the tutelage of the assigned Joint Prevention Service have been delivered with a view to enhancing work-related health and safety training, and a programme of field trips has been set up to observe examples of safe actions and unsafe behaviour, involving those in charge of the areas affected. Here, the total number of workers trained/courses delivered, and the progress made in terms of the total percentage of professionals trained is monitored, while the observation field trips are analysed to ascertain the main reasons triggering such observations, before planning actions to remedy the anomalies detected.

Indra Group organises awareness campaigns to promote the importance of protecting health, avoiding risks and developing healthy lifestyles. These campaigns are complemented by annual medical check-ups, including the option of a flu vaccination. Activities are also organised every year to raise awareness of the importance of health protection and risk avoidance.

Refer to 2024 Sustainability Report chapter 5. ESRS S1. Own workforce for comprehensive details on Indra Group's health and safety performance.

5.2 Human Rights

Indra Group is aware of the risks and impact it has on individuals, both as an employer and via the technological solutions it develops for its clients. That's why Indra Group is firmly committed to mitigating and managing these risks and negative impacts, leading the way on the protection and promotion of Human Rights.

In addition to Indra Group's efforts internally, the Group also aim to ensure that respect for human rights runs right through the value chain, and it encourage its suppliers, clients and business partners to work with us to achieve this. Indra Group develops initiatives with suppliers to make sure that they respect human rights, and work with clients and business partners to develop socially responsible products and services that use data responsibly.

The **Humans Rights Policy** forms part of the Indra Group's commitment to ethical conduct, set out in its Code of Ethics and Legal Compliance and other corporate policies which protect the fundamental rights of individuals, either directly or indirectly.

The policy defines the principles for action that the Indra Group assumes and promotes and that must govern the Group's actions in accordance with the United Nations Guiding Principles on Business and Human Rights. The Policy aims to:

- Define the specific commitments undertaken by the Indra Group at the global level in relation to the observance and promotion of the human rights directly or indirectly impacted by its operations in the communities where it is present.

- Establish the overall principles needed to ensure that such commitments are integrated within the Group's business model and the way it runs its operations.

Indra Group's Human Rights Policy is based on the **United Nations Guiding Principles on Business and Human Rights**, and on the following international conventions and commitments regarding Human Rights.

Universal Declaration of Human Rights of the United Nations

International Covenant on Economic, Social and Cultural Rights of the United Nations

International Covenant on Civil and Political Rights of the United Nations

United Nations Global Compact

The Organization for Economic Co-operation and Development's Guidelines for Multinational

The Fundamental Conventions of the International Labor Organization (ILO)

United Nations Convention on the Rights of the Child

United Nations Convention on the Rights of Persons with Disabilities

In addition to its Human Rights Policy, Indra Group also has a number of other policies and standards of conduct that deal with the respect for human rights. These policies and sets of standards demonstrate how the due diligence system operates across the board, covering the activity both of Indra and value chain activities:

- Code of Ethics and Legal Compliance
- Sustainability Policy
- Sustainability Policy for Suppliers
- Privacy Policy
- Information Security Policy
- Equality Plans and Diversity Policy

Governance of Human Rights

Corporate governance on human rights is determined at the highest level. **Indra Group's Board of Directors** sets out the Group's ESG strategy, plans, policies and goals, which include all matters relating to the protection of human rights.

The **Sustainability Committee** then monitors and evaluates the extent to which these sustainability policies and targeted action plans are complied with, particularly in as far as responsibilities on human rights are concerned, while the Auditing and Compliance Committee is tasked with overseeing the financial and non-financial reporting process and verifying the accuracy and completeness of the information (including information on human rights) disclosed, as well as ensuring that our financial and non-financial risk control and management systems are effective.

Finally, the Sustainability Department, guides how Indra Group's sustainability strategy, including its strategy on human rights, is put into practice by the Group's divisions and corporate functions.

Priority human rights issues

Human rights issues are identified based on **risk analyses**, grievance mechanisms and the feedback we receive from stakeholders. Issues identified as being a priority are added to the Group risk catalogue and evaluated annually as part of the Group-wide risk assessment process.

Indra Group has carried out a review of the main human rights risks across its entire value chain using independent external specialists. Risks inherent to each sector that the Group operates in (Defence, ATM, Mobility and information technologies) were taken into consideration, as were those connected with the value chain (including the supply chain, and operational and corporate processes) and the risks specific to the regions where Indra has a significant presence.

Using the method recommended by COSO and the WBCSD, the results of this human rights risk analysis were **aligned with Indra Group's corporate Risk Map.** This led to the definitions of risks in the Group Risk Map being updated to include human rights considerations.

The human rights issues identified are also incorporated into the Group's **Double Materiality assessment** for the Sustainability Report, conducted under the CSRD[11] framework. Human rights issues are assessed in terms of both risk and impact on people.

Therefore, all potential human rights issues are assessed on an annual basis through the group-wide risk assessment process and the double materiality assessment. The assessment is performed on the entire value chain, covering 100% of own operations, including business partners, tier-1 suppliers, customers and users, and society and communities.

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[11] COMMISSION DELEGATED REGULATION (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards sustainability reporting standards.

Human Rights potentials issues	Value chain rightsholders				
	Own workforce	Suppliers' workforce	Business partners	Clients and users	Society and communities
Labour conditions: Contractual conditions, freedom of association, safety and health, mental health, unacceptable behavior.	✓	✓	✓		
Discrimination: Discrimination, harassment	✓	✓	✓		
Privacy: Personal data, use of data, improper use	✓	✓	✓	✓	✓
Technology development and use: Inappropriate use, discrimination				✓	✓
Impact on environment	✓	✓	✓	✓	✓

Due diligence regarding human rights

As part of its principles for action, the Humans Rights Policy provides for the application of **human rights due diligence** in order to identify any potential impacts on the rights of individuals that the Indra Group's operations and activities may have, either directly or via third parties, and for the development of mechanisms to prevent and mitigate human rights risks and remediate any negative impacts should such risks materialise.

To this end, the Indra Group has devised a general human rights due diligence framework to allow it to take human rights considerations into account when looking both at its own operations and the value chain, including the monitoring of compliance with the United Nations Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises.

The human rights due diligence systems are detailed below.

Human rights due diligence system	
Human Rights Policy	Indra Group has defined a Humans Rights Policy that sets out the governance model, commitments and principles for action in terms of human rights.
Assessment of material topics	The Indra Group identifies and assesses human rights issues for the Group. The Group's list of material issues is reviewed periodically with external experts, with management and other stakeholders also actively involved in the process.
	The most material human rights issues are added to the Indra Group risk catalogue and evaluated annually.
	The Indra Group regularly analyses respect for human rights regarding labour rights of workers in the value chain at an aggregate level. By tracking supplier risk scores, the risk of non-compliance with human rights by each of the suppliers within the Group's value chain is constantly monitored.

Human rights due diligence system	
Integration in processes	The Indra Group has set in place internal policies and procedures to champion respect for employment rights, avoiding discriminatory practices and fostering a respectful and motivating working environment.
	It also delivers sustainability training with specific human rights-related content for all professionals within the Group.
	The Indra Group has established policies and procedures to respect and promote fundamental rights in its value chain. These policies are aligned with the principles reflected in the Indra Group's Human Rights Policy as described above.
	To ensure compliance with the UK's Modern Slavery Act, the Modern Slavery Statement is annually updated and approved by the Board of Directors.
	Human rights-related requirements affecting suppliers and found in the aforementioned Sustainability Policy for Suppliers have also been added.
	The human rights risk of critical, major and minor suppliers is assessed, looking at factors such as compliance with labour, health and safety, information security and data privacy standards, as well as with the prohibition of child and forced labour.
	Compulsory training on human rights for security subcontractor personnel is carried out.
	The Indra Group has established internal policies and processes to promote respect for human rights in its business operations, such as the Tendering Committee Regulations which includes ESG and human rights risks among those analysed. Assessment of the human rights risks resulting from the improper use of technology is also added to the risk assessment for commercial-stage tenders.
Assessment and reporting	The Group reports twice-yearly to the Sustainability Committee on the rollout of the specific human rights initiatives envisaged in the ESG Plan, and annually on its human rights performance through the Sustainability Report and the up-to-date information on the Indra Group website.
	The Group also uses its risks map to track any human rights risks and takes part in industry initiatives and specific work streams to set up channels for dialogue with its stakeholders.
	Indra Group also takes part in industry initiatives and specific work streams to set up channels for dialogue with its stakeholders.

Human rights risk mitigation and remediation

Indra Group's **Direct Channel** is the mechanism through which queries and communications relating to both the Group's Code of Ethics and Legal Compliance and its Human Rights Policy should be received. The Direct Channel allows stakeholders to complain or enquire about any aspect related to ethics and compliance (and also about anything explicitly Human Rights related).

Following a review of the communications received through the Direct Channel, Indra has determined that the human rights risks most likely to arise are those relating to harassment and unacceptable behaviour, discrimination, and information security.

Where there have been any cases of these risks occurring, the Group has taken remediation action, which has included both disciplinary and non-disciplinary measures being taken against the offending individuals.

Refer to 2024 Sustainability Report chapter 5. ESRS S1. Own workforce, chapter 6. ESRS S2. Workers in the value chain and chapter 7. ESRS S4. Consumers and end-users for comprehensive details on Indra Group's human rights performance.

6 ESG indexes and analysts

In 2024, Indra Group was ranked as the No. 3 company in the prestigious S&P Global CSA (Corporate Sustainability Assessment), which, with more than 16,500 data points, is also used to compile the Dow Jones Sustainability Index (DJSI) in which Indra has been listed for 19 years in a row. The Indra Group is among the top-ranked companies in environmental and social criteria and stands out as a top performer in the sector, achieving outstanding scores in innovation, climate strategy, emissions, circular economy, workplace practices, client management, and fiscal strategy.

The company excels as the only company in the IT Services sector to have remained in a leading position for five years in a row in the S&P Sustainability Yearbook. It is the ultimate recognition of Indra Group's commitment to improving its financial, social and environmental performance, using technology to make its contribution to the 2030 Agenda and increasing the positive impact that it has on people and on the planet. These results are testament to the continued effort made by the Group to place sustainability at the heart of its stated mission and strategy.

In 2024, Indra Group has solidified its leadership in climate action by reaching the prestigious **A List of the Carbon Disclosure Project (CDP)**, marking an improvement over last year's A- rating. This elite classification places the Group among the highest-rated firms globally and well above the sector average (C). It is a true recognition of Indra Group's environmental strategy, fully integrated into its management of climate change risks and opportunities. also obtained the highest rating for areas such as climate strategy and scenario analysis, emissions reduction initiatives, climate risks, emissions and emissions reduction targets.

Indra Group also stands out in other indices. The FTSE4Good has recognised Indra Group's practices in matters of sustainability as far superior to the sector average. In an assessment carried out by EcoVadis, Indra Group obtained a sustainability rating of 82/100, earning a platinum medal for being in the top 1% of companies able to demonstrate that they have a robust management system in place to address sustainability criteria in accordance with the method recommended by EcoVadis, a world leader in corporate sustainability ratings.

Meanwhile, in 2024, Sustainalytics did not change Indra Group's ESG risk rating, with the Group remaining in a low-risk category (11,8), a level that places it in percentile 2 for the Software and Services sector and percentile 3 for the IT Consulting sub-sector.

Indra Group has earned an A rating from the MSCI-ESG rating agency, reflecting its strong commitment to sustainability, corporate responsibility, and effective ESG risk management. This recognition positions the Group among the industry's leading performers in environmental, social, and governance criteria, reinforcing its dedication to sustainable business growth and ethical decision-making.

In 2024, Indra Group has been recognized as the Best Women Talent Company, ranking among Spain's Top 30 Companies for Best Practices in Visibility and Promotion of Women in Business. This distinction underscores the Group's commitment to gender equality and talent development. Additionally, Indra Group has been awarded the Top Employer certification for the seventh consecutive year, reaffirming its dedication to excellence in workplace culture and employee well-being.

Eventually/Finally, Indra Group has also been recognized as one of the "World's Best Companies in Sustainable Growth 2025", compiled by the American magazine Time and the market research firm Statista and identifying companies around the world demonstrating both outstanding financial and environmental performance.

Nº3 industry leader S&P Global CSA Score in 2024. Nº1 in 2021, 2022 & 2023.

87/100 points overall rating

In 2024 Indra Group maintains a leading position for the fourth consecutive year in the IT Services sector, achieving the highest score (100/100) in the criteria of Fiscal Strategy, Transparency and Reporting, Business Ethics, Energy and Privacy.

Advanced level of reporting to the Global Compact

Indra Group has been a member since 2004 of the Global Compact and reports annually on its progress in implementing the Compact's Ten Principles and Sustainable Development Goals.

Leadership level (A) for climate performance

The company has received the highest rating, leadership rating (A) for its Climate Change strategy in 2024, only 2% of the more than 22,400 companies assessed in the climate change category have made it onto the A List, including Indra Group.

Our Net Zero target with 1.5ºC ambition approved by SBTi

Indra Group's emission reduction targets are set according to the Science Based Target Initiative methodology with ambition 1.5ºC and have been validated in 2024.

Top 31% in Technology sector

3,9/5 points overall rating

Indra Group has the highest possible rating (100/100) in the categories of Human Rights, Labor Standards, Anti-corruption and Corporate Governance.

Top 1% in EcoVadis

82/100 points overall rating

Indra Group stands out for its performance in environment (100/100) and in labour practices and human rights, and ethic (80/100).

A sector rating on MSCI-ESG

A Rating

Indra Group has the third best score in this index, with an Industry-leading performance in corporate governance, emissions and Clean Technology opportunities.

Low ESG risk and best sector performance

Indra Group has a low ESG risk rating (11,8/100) according to Sustainalytics, demonstrating solid management of the most relevant ESG issues for the company. Outstanding performance in Corporate Governance.

Best Women Talent Company in 2024

Indra Group is one of the 30 companies in Spain with best practices in visibility and promotion of women in business group

Top Employer company

Top Employer Institute has recognized Indra Group as the best companies to work for in Spain for the seventh consecutive year.

Certifications

Indra Group considers it a core responsibility —and one of the pillars of its sustainability— to provide clients with innovative solutions and services that meet high quality standards. As evidence of this commitment to reliability and trust, regularly undergoes audits conducted by independent bodies to certify its management and production systems in accordance with leading international standards, including:

UNE 166002	UNE EN ISO 50001	ISO 22301	Pecal 2110
UNE 16555-1	UNE-ISO/IEC 27001	ISO 45001	Pecal 2210
UNE 19601	UNE-ISO/IEC 20000-1	ISO 14064	Pecal 2310
UNE-EN-ISO 9001	UNE-ISO/IEC 27018	ISO 37001	CMMi (Capability Maturity Model Integration)
UNE-EN 9100 Aerospace Series	ISO 14001	ENS-2019/0057	TMMi (Test Maturity Model Integrated)
UNE-EN 9110	ISO 22163	ENS-2021/0046	EMAS Certificate of Registrations
UNE-EN 9120	ISO 44001	CERT-ENS-25373	Certification Nadcap AC7120

These standards are adapted and implemented using systems and methodologies developed in accordance with the Group's particularities to provide solutions for the specific needs of our clients, such as:

- Indra Methodology for Project Management: proprietary methodology for project management to ensure quality and efficiency, based on the PMbok project management Standard of the Project Management Institute
- Indra MIDAS methodology: proprietary methodology for project execution and production used together with and as a complement of the Indra Method for Project Management (MIGP). It includes the requirements of standards and methodologies applicable in each type of project or service (ISO 9001, PECAL 2110, PECAL 2210, PECAL 2310, UNE-EN 9100, UNE EN 9100, CMMi, TMMi, ITIL).
- Operational risks system: Corporate system for monitoring the risks of its operations
- Information Systems Management: model to manage IT services based on the ITIL methodology, the ISO/IEC 20000-1, UNE-ISO/IEC 27001 and UNE-ISO/IEC 22301 standards and the recommended good practices

The comprehensive application of these systems and methodologies allows for ensuring the Group's capacity to supply products that satisfy client requirements, comply with applicable legislation and regulations as well as continuously improve our work processes.

7 Annex

7.1 Double materiality

The following tables illustrate the relationship between the disclosure requirements established in the cross-cutting and thematic standards of the NEIS, as set out in RD (EU) 2023/2772, and fulfilled by the Indra Group when preparing the 2024 Sustainability Report and the results of the materiality analysis, grouped by themes of the ESG Plan 2024-2026, as reported in section 1.1 of this report, 'Double materiality assessment'.

Environment	Material impacts	Material Risks & Opportunities	Results	ESG Plan '24- '26
ESRS E1 – Climate change	**11**	**1**	**Material**	
Climate change adaptation	2	-	Material	Net zero emissions
Climate change mitigation	6	1	Material	Net zero emissions Eco-design Responsible sourcing
Energy	3	-	Material	Net zero emissions
ESRS E2 – Pollution	-	-	No Material	
Pollution of air	-	-	No Material	
Pollution of water	-	-	No Material	
Pollution of soil	-	-	No Material	
Pollution of living organisms and food resources	-	-	No Material	
Substances of concern and Substances of very high concern	-	-	No Material	
Microplastics	-	-	No Material	
ESRS E3 – Water and marine resources			No Material	
Water	-	-	No Material	
ESRS E4 – Biodiversity and ecosystems			No Material	
Direct impact drivers of biodiversity loss	-	-	No Material	
Impacts on the state of species	-	-	No Material	
Impacts on the extent and condition of ecosystems	-	-	No Material	
Impacts and dependencies on ecosystem services	-	-	No Material	
ESRS E5 – Circular economy	**15**	**-**	**Material**	
Resources inflows, including resource use	1	-	Material	Circular economy Eco-design
Resource outflows related to products and services	2	-	Material	Circular economy Eco-design
Waste	12	-	Material	Circular economy

Social	Material impacts	Material Risks & Opportunities	Results	ESG Plan '24- '26
ESRS S1 – Own workforce	**26**	**6**	**Material**	
Working conditions	16	2	Material	Employee experience and well-being / Diversity and inclusion / Stakeholder engagement / Ethics, anti-corruption and Human Rights
Equal treatment and opportunities for all	9	4	Material	
Other work-related rights	1	-	Material	Cybersecurity and privacy by design
ESRS S2 – Workers in the value chain	**14**	**1**	**Material**	
Working conditions	7	1	Material	Responsible sourcing
Equal treatment and opportunities for all	6	-	Material	Responsible sourcing
Other work-related rights	1	-	Material	Responsible sourcing / Cybersecurity and privacy by design
ESRS S3 – Affected communities	-	-	No Material	
Communities' economic, social and cultural rights	-	-	No Material	
Communities' civil and political rights	-	-	No Material	
Rights of Indigenous peoples	-	-	No Mate-rial	
ESRS S4 – Consumers and end- users	**4**	**1**	**Material**	
Information-related impacts for consumers and/or end-users	2	1	Material	Customer satisfaction / Cybersecurity and privacy by design
Personal safety of consumers and/or end-users	2	-	Material	Customer satisfaction
Social inclusion of consumers and/or end-users	-	-	No Material	

Governance	Material impacts	Material Risks & Opportunities	Results	ESG Plan '24- '26
ESRS G1 – Business conduct	**10**	**2**	**Material**	
Corporate culture	2	1	Material	Governance & business integrity
Protection of whistle-blowers	1	-	Material	Cybersecurity and privacy by design
Animal welfare	-	-	No Material	
Political engagement and lobbying activities	1	1	Material	Stakeholder engagement
Management of relationships with suppliers including payment practices	3	-	Material	Responsible sourcing
Corruption and bribery	3	-	Material	Ethics, anti-corruption and Human Rights
Entity Specific				
Innovation	3	3	Material	Responsible products & services
Information security	4	1	Material	Cybersecurity and privacy by design
Responsible taxation	1	1	Material	Accountability and transparency

7.2 Sustainability indicators

7.2.1 Governance

Ethics and anti-corruption

Ethics, competition and anti-corruption	2021	2022	2023	2024
Employees who have received training in ethics, compliance and anticorruption (nº)	50,965	55,270	55,687	57,298
Suppliers under the scope of application of the Code of Ethics (%)	100%	100%	100%	100%

Information Security

Information Securityr	Objetive	2024
Critical-impact incidents for the Indra Group	0 critical-impact incidents	0 critical-impact incidents
Number of alerts managed by the Information Security Department.	-	1,200 alerts managed
Indra Group's users training in Information Security and Privacy	100%	97%

Privacy

Information Securityr	Objetive	2024
Number of complaints related to breaches of customer privacy and loss of customer data	0 complaints	0 complaints
Number of requests not managed in relation to unsubscribing from newsletters or the forwarding of commercial information	0 not managed requests	0 not managed requests
Client information requests received from governments (no. | %)	-	0 | 0%
Use of personal data for secondary purposes (no. | %)	-	0 | 0%

7.2.2   Environment

Energy

Energy consumption and mix	2021	2022	2023	2024
Energy consumption from non-renewable sources				
Fuel consumption from coal and coal products (MWh)	0	0	0	0
Fuel consumption from crude oil and petroleum products (MWh)	393	1,122	2,896	2,565
Fuel consumption from natural gas (MWh)	2,857	2,967	2,538	2,708
Fuel consumption from other fossil sources (MWh)	0	0	0	0
Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources (MWh)	9,856	6,095	5,481	1,683
Total fossil energy consumption (MWh)	13,106	10,184	10,915	6,956
Share of fossil sources (%)	24%	21%	24%	16%
Energy consumption from nuclear source				
Consumption from nuclear sources (MWh)	0	0	0	161
Share of consumption from nuclear sources (%)	0%	0%	0%	0%
Energy consumption from non-renewable sources				
Fuel consumption for renewable sources (MWh)	0	0	0	0
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	40,909	38,764	35,437	34,767
Consumption of self-generated non-fuel renewable energy (MWh)	0	0	0	539
Total renewable energy consumption (MWh)	40,909	38,764	35,437	35,305
Share of renewable sources (%)	76%	79%	76%	83%
Total energy consumption (MWh)	54,015	48,948	46,352	42,423

Note: Energy consumption has been calculated in accordance with standard E1-5 of the Corporate Sustainability Reporting Directive. This standard requires consumption of purchased or acquired electricity, heat, steam, and cooling to be reported by source of generation (fossil fuel, nuclear or renewable), so the table above does not show the Group's total consumption of purchased or acquired energy. The total consumption of purchased electricity is 36,611 MWH.

Water

Water Consumption	2021	2022	2023	2024
Water withdrawal (m^3)	98,915	118,373	122,698	124,336
Water discharge (m^3)	0	0	0	0
Total net fresh water consumption (m3)	98,915	118,373	122,698	124,336

Note: 100% of the water withdrawal by Indra Group is fresh water; no other sources of water extraction have been identified (surface water, sea water or produced water). Indra Group carries out a non-water-consuming activity. The main uses of water are human consumption, cleaning of centres and irrigation of garden areas. For this reason, it is considered that 100% of the water extracted is discharged back into the municipal sanitation system and that therefore the water consumed by Indra without returning to the network is 0.

Waste

Waste generated	2021	2022	2023	2024
Non-hazardous waste generated (kg)	559,000	735,000	734,098	1,725,297
Hazardous waste generated (kg)	57,000	68,000	57,727	58,533
Total amount of waste generated (kg)	618,000	806,000	791,826	1,783,830

Waste treatment operations	2021	2022	2023	2024
Waste treatment operations – recovery				
Preparing for reuse (kg)	-	-	-	20
Recycled (kg)	324,246	709,710	723,316	740,016
Other recovery operations (kg)	-	-	-	838,978
Total waste recovered	324,246	709,710	723,316	1,579,014
Waste treatment operations – disposa				
Incineration (kg)	0	313	109	621
Landfill (kg)	426	59,884	7,624	203,255
Other disposal operations (kg)	229,990	37,254	61,370	941
Total waste disposal	230,416	97,451	69,103	204,817
Total amount of waste generated (kg)	618,000	806,000	791,826	1,783,830

Pollution

Waste generated	2021	2022	2023	2024
NOx emissions (t)	0.578	0.888	1.433	1.412
SOx emissions (t)	0.201	0.569	1.462	1.462
Emissions of other volatile organic compounds (VOC) (t)	0.011	0.024	0.055	0.055
Direct dust emissions (t)	-	-	-	0.738

Note: Emissions from the consumption of fuel at our sites (diesel and natural gas) and by Group vehicles, calculated using the European Environment Agency emission factors30 and EC Regulation no. 715/200731. The increase in these emissions in 2023 is due to increased diesel consumption, particularly at our site in Coslada (Madrid). For more information, see section 5.3 (Climate Change and Reducing Emissions) on direct and indirect emissions under Scope 1 and 2 of the GHG Protocol.

GHG Emissions

	Base year (2019)	2023	2024	2024 vs. 2023 (% variation)
Scope 1 GHG emissions (tCO$_2$e)				
Gross scope 1 GHG emissions	**2,733**	**2,035**	**1,831**	**-10%**
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	0.0%	0.0%	0.0%	-
Scope 2 GHG emissions (tCO$_2$e)				
Gross location-based Scope 2 GHG emissions	19,075	6,583	6,665	1%
Gross market-based Scope 2 GHG emissions	**6,198**	**1,182**	**829**	**-30%**
Significant Scope 3 GHG emissions (tCO$_2$e)				
Total gross indirect (Scope 3) GHG emissions	**507,063**	**430,127**	**446,361**	**4%**
Purchased goods and services (Category 1)	299,163	236,025	258,468	10%
Capital goods (Category 2)	17,010	6,919	5,937	-14%
Fuel and energy-related activities not included in Scope 1 or Scope 2 (Category 3)	1,824	80	346	332%
Upstream transportation and distribution (Category 4)	9,996	14,861	16,694	12%
Waste generated in operations (Category 5)	212	168	333	98%
Business travel (Category 6)	77,251	33,120	30,103	-9%
Employee commuting (Category 7)	35,522	28,418	30,134	6%
Upstream leased assets (Category 8)	10,908	6,472	8,392	30%
Use of sold products (Category 11)	41,787	72,214	74,359	3%
End-of-life treatment of sold products (Category 12)	398	257	21	-92%
Investments (Category 15)	12,991	31,593	21,574	-32%

7.2.3 Social

Professionals

Professionals	2021	2022	2023	2024
Total Indra workforce (nº)	52,083	56,735	57,755	60,907
Subcontracted workers (nº)	4,903	2,259	3,115	3,053
Indra average staff (nº)	50,538	54,816	56,866	58,771

Workforce Breakdown	Number of professionals	Share in total workforce
Indra	60,907	-
per gender		
Male	41,300	68%
Female	19,607	32%
per category		
Top Management	13	0%
Middle Management	608	1%
Management	621	1%
First-line management	5,209	9%
All management	5,830	10%
Technical staff	42,183	69%
Support staff	11,863	19%
Other categories	1,044	2%
per range age		
More than 50 years	11,592	19%
Between 30 and 50 years	33,731	55%
Less than 30 years	15,584	26%
per geographic area		
Spain	34,836	57%
Europe	3,802	6%
America	20,161	33%
Asia. Middle East and Africa	2,108	3%
per nationality (*)		
Local nationality	58,918	97%
Other nationalities	1,989	3%
per contract modalities		
permanent contract	55,966	92%
temporary contracts	4,941	8%
per type of workday		
Full-time	57,764	95%
Part-time	3,143	5%

(*) Note: Nationality breakdown is divided into local and other nationalities. 'Local nationality' refers to professionals whose country of origin or nationality is the same as the country in which they work. 'Other nationalities' refers to all professionals whose country of origin or nationality is different from the country in which they work.

Diversity metrics

Professionals	2021	2022	2023	2024
Male	34,237	37,780	38,911	41,300
Female	17,846	18,955	18,844	19,607
Other	-	-	-	0
Not reported	-	-	-	0
Total Indra workforce (nº)	52,083	56,735	57,755	60,907

Workforce Breakdown: Gender	2024
Share of female in total workforce	32%
Share of female in all management positions. including junior. middle and top management	26%
Share of female in junior management positions	27%
Share of female in middle management positions	18%
Share of female in top management positions	8%
Share of female in management positions	18%
Share of female in management positions in revenue-generating functions	25%
Share of female in STEM-related positions	32%

Professionals	2021	2022	2023	2024
Nationalities (nº)	105	121	113	107

Workforce Breakdown: Nationality	Share in total workforce	Share in all management positions
Spanish	55%	79%
Brazilian	12%	4%
Colombian	7%	1%
Peruvian	6%	1%
Mexican	5%	4%
Italian	4%	3%
Filipin	3%	0%
Chilean	2%	1%
Portuguesa	1%	2%
Argentinian	1%	1%
Other nationalities	5%	3%

Hiring and promotion

	Total new additions (nº)	Vacancies that are filled by internal candidates
Indra	**14,790**	**3,935**
per gender		
Men	10,167	2,834
Women	4,623	1,101
per category		
Management	34	7
First-line management	429	142
Technical staff	9,165	3,178
Support staff	4,805	326
Other categories	357	282
per range age		
More than 50 years	970	256
Between 30 and 50 years	6,599	2,187
Less than 30 years	7,221	1,492
per geographic area		
Spain	6,102	635
Europe	554	154
America	7,712	3,069
Asia. Middle East and Africa	422	77
per nationality		
Local nationality	14,112	3,823
Other nationalities	678	112

Percentage of open positions filled by internal candidates (internal hires)	21%
Promoted employees (%)	21%
Promoted women (over the total number of promoted women in the Group) (%)	27%

Average hiring cost (€)	1, 044

Employee Turnover Rate

	Total employee turnover rate	Voluntary employee turnover rate
Indra	**23.0%**	**9.7%**
by gender		
Men	22.8%	10.6%
Women	23.4%	8.0%
per category		
Management	13.4%	3.5%
First-line management	12.0%	4.5%
Technical staff	20.6%	10.4%
Support staff	36.4%	9.6%
Other categories	31.3%	12.8%
per range age		
More than 50 years	11.9%	2.7%
Between 30 and 50 years	21.0%	8.8%
Less than 30 years	36.8%	17.5%
per geographic area		
Spain	14.5%	8.8%
Europe	12.4%	6.8%
America	39.6%	12.7%
Asia. Middle East and Africa	24.8%	1.8%
per nationality		
Local nationality	22.9%	9.5%
Other nationalities	26.1%	14.3%

Remuneration metric and Gender Pay Indicators

Average Salary	Male		Female	
	Base salary	Total salary	Base salary	Total salary
Management	128,137	196,830	104,046	145,647
First-line management	63,726	73,202	58,238	66,702
Technical staff	31,916	32,318	29,005	29,443
Support staff	16,269	16,291	12,269	12,314
Other categories	33,860	34,395	20,934	21,473
Indra	**33,684**	**35,767**	**27,173**	**28,352**

Note: Average remunerations in 2024 were calculated taking into account the fixed salary and variable amount accrued. In all cases. additional concepts such as cash grants. bonuses. long-term incentives. share-based remuneration etc. were not included.
The professional categories correspond to those established by Indra Group internally. The aggregated average salaries (basic salary | total salary) are as follows: Male top management (349,263 | 755,284), management (65,149 | 79,955), and non-management (29,763 and 35,767); Female top management (315,000 | 629,777), management (58,947 | 69,471), and non-management (24,393 and 24,742)

Professionals subjected to a variable remuneration system (%)	19%
Managers subjected to a variable remuneration system (%)	98%
Managers subjected to medium and long-term incentive targets (%)	33%

Adjusted gender pay gap by employee category (%)	Adjusted gender pay gap
Management	12%
First-line management	4%
Technical staff	3%
Support staff	1%
Other categories	n/a
Indra	2%

Note: The adjusted gender pay gap is defined as the difference in salaries between groups of employees at the same level. The wage gap is calculated by comparing the remuneration between segments of equivalent employees (same category. same business unit. same country). In other words. the figure obtained represents the percentage that women earn less than men. considering similar positions and responsibilities. The calculation does not include professional segments that do not contain at least one female and one male employee. meaning that it actually extends to 90% of the workforce.

Gender pay gap by employee category (%)	Base salary	Total salary
Management	18.8%	26.0%
First-line management	8.6%	8.9%
Technical staff	9.1%	8.9%
Support staff	24.6%	24.4%
Other categories	38.2%	37.6%
Indra	19.3%	20.7%

Note: Gender pay gap in 2024 were calculated taking into account the fixed salary and variable amount accrued. In all cases. additional concepts such as cash grants. bonuses. long-term incentives. share-based remuneration etc. were not included.
The Gender pay gap is calculated as the difference in salary (average male employees – average female salary) / (average male salary). without taking into consideration any other factor that could have an influence on a person's remuneration. such as geographical location or the department where they work

Freedom of Association

Freedom of Association	2021	2022	2023	2024
Employees covered by a collective agreement	77%	75%	77%	75%
Employees with access to instruments to safeguard their rights collectively	97%	99%	99%	99.7%

Training & Development Inputs

Training & Development	Number of professionals	Average hours of training and development	Average amount spent per on training and development
Indra	**63,053**	**22.4**	**141.6**
by training type			
Mandatory training	59,548	4.3	0.6
Non-compulsory training	45,132	25.5	196.3
by gender			
Men	42,872	23.5	160.3
Women	20,181	20.0	101.9
per category			
Management	595	11.5	91.9
First-line management	5,278	19.6	156.8
Technical staff	44,059	24.2	150.5
Support staff	12,418	17.0	84.7
Other categories	703	34.3	520.4
per range age			
More than 50 years	11,596	20.8	116.1
Between 30 and 50 years	34,707	20.2	101.9
Less than 30 years	16,739	28.1	241.7
per geographic area			
Spain	35,365	27.7	241.7
Europe	3,617	24.0	69.8
America	21,891	14.7	5.8
Asia. Middle East and Africa	2,180	10.5	0.2
by country (more than 1.000 employees)			
Spain	34,390	27.8	241.1
Italy	2,136	36.1	108.8
Brazil	7,929	18.5	0.2
Chile	1,142	8.0	8.2
Colombia	4,447	13.1	4.2
Mexico	3,687	11.6	21.1
Peru	3,749	11.4	1.4
Philippines	1,697	12.4	0.1
Other countries	3,876	15.3	76.1

Performance Appraisal	2021	2022	2023	2024
Employees who have participated in the performance evaluation	81%	77%	89%	87%
Employees in a multidimensional evaluation system	39%	90%	94%	93%
Employees in a benchmarking system	98%	98%	96%	93%

Health and safety

Health and safety performance metrics	2024
Fatalities (no.)	0
Frequency rate (nº of accidents per million hours worked)	1.73
Incidence rate (nº of accidents per million workers)	3.09
Severity rate (nº of day lost per million hours worked)	0.04
Absenteeism rate (%)	4%

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