



General Policy

POL-1011

# Direct Channel Policy

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**Approved by:**

Indra Sistemas Board of Directors on 29 July 2024

# Direct Channel Policy

Indra Group<sup>1</sup> queries and communications channel ('**Direct Channel**'), which is part of the Internal Information System ("**System**")<sup>2</sup>, available at <https://canaldirecto.indracompany.com/> and on its internal and external website, is the preferred confidential communication channel that Indra Group makes available to all administrators, executives, employees, representatives, suppliers and other third parties who, in any capacity, act on behalf of Indra Group, including agents, intermediaries or subcontracted companies ('**Professionals and Partners**') regardless of the territory in which they operate, as well as other third parties with a legitimate interest, for reporting:

- any question about the interpretation or application of Indra Group's Code of Ethics and Legal Compliance ('**Code of Ethics**') and its implementing regulations,
- any illegal behavior, irregularity or infringement detected in relation to the Code of Ethics and its implementing regulations,
- at European Union level:
  - infringements of European Union law, in particular those related to public procurement, services, financial products and markets, anti-money laundering, counter terrorist-financing, product safety, transport safety, environment, radiation protection and nuclear safety, public health, consumer protection, protection of privacy and personal data, and security of network and information systems,
  - those infringements affecting the financial interests of the European Union or
  - those infringements affecting the internal market of the European Union (such as antitrust, State aid or corporate taxation),
- any serious or very serious criminal or administrative infringements or offences, including those involving economic loss for the Treasury or for Social Security (or equivalent organization) and
- any other infringements or irregularities that are able to be reported through the company's internal channels in accordance with the legislation in force in each country.

**All Indra Group Professionals and Partners must report any alleged irregularity or action that is against the law or internal regulations** that they suspect or become aware of. This will make it possible to detect and, where applicable, verify any irregularities or non-compliances and, where applicable, adopt the necessary measures to mitigate the risk of them occurring again in the future. These communications can be made anonymously.

Indra Group's Compliance Unit ('**CU**') is the body that, with functions delegated by the Audit and Compliance Committee ('**ACC**'), manages the communications received through the Direct Channel. In particular, the **Responsible for the System (RS)** responsible for the management of the Direct Channel. The access to the Direct Channel is restricted to the RS and members of the CU designated by him.

**The RS will take as many actions as he/she considers necessary and among them, in line with the applicable internal implementing regulations, in any case, to better clarify the**

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<sup>1</sup> Indra Group includes both Indra Sistemas, S.A., and any investee company, in which the former has a direct or indirect interest, pursuant to the existing corporate structure at all times.

<sup>2</sup> Pursuant to Directive 2019/1937 of the European Parliament and of the Council, of 23 October 2019, on the protection of persons who report breaches of Union law and the national laws that transpose it, including but not limited to Spanish Law 2/2023 regulating the protection of the people who report breaches of regulations and the fight against corruption.

**facts or conducts reported he/she will be able to**; among others, take statements from other Indra Group's Professionals or Partners involved in or affected by the investigation, including the person who reports the fact or conduct (**'Reporter'**), as well as guarantee confidentiality and the absence of conflicts of interest in the resolution of the communications. Indra Group's Professionals and Partners, as well as any other third parties with a legitimate interest, must collaborate in a loyal, active and effective manner with the CU in the course of its investigations.

The **procedure** to be followed by the CU in the processing, investigation and resolution of consults and communications is detailed in the **'Direct Channel Management Protocol'** which is part of Indra Group's internal regulations and which will be provided to those affected by a complaint or communication. The CU's actions, in all cases, **are carried out under the principles of impartiality, confidentiality and independence** responding thereof within the deadlines established in accordance with the legislation in force.

Through the management of the Direct Channel, compliance of the applicable legal regulations on **personal data protection shall be ensured**. Personal data will be processed for the time necessary to fulfil this purpose.

It is strictly **forbidden to retaliate** against those who in good faith (i) inform Indra Group of any of the aforementioned infringements or offences or (ii) collaborate in their investigation or help to resolve them. However, appropriate measures may be taken against those who act in bad faith, such as sending false, distorted or illegally obtained information.

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

The content of this Policy is communicated and disseminated to all Professionals and Partners, who will be suitably informed of its existence and mandatory compliance. Indra Group conducts a training plan on Ethics and Compliance matters, and also on Competition Law, including the Direct Channel, which is being managed by the Compliance Unit in coordination with the Human Resources area. This training is mandatory for all Professionals and Partners.