

## CODE OF ETHICS

Rev.1 of 10/09/2025

### INTRODUCTION

Indra srl (hereinafter also the "Company") has always paid great attention to the ethical aspects of the business and considers legality and fairness as essential conditions for carrying out its business activities.

In carrying out its activities, in fact, the Company intends to comply not only with the laws and provisions in force in all the countries that it operates in, but also with the high ethical standards and inspiring

principles that are set out in this code of ethics. This Code constitutes an integral part of the Organisation, Management and Control Model adopted by the Company and contains the ethical principles that the Company considers fundamental in the performance of its activities and the rules of conduct that all those acting in the name of the Company must observe.

Consequently, all those who work for the Company or collaborate with it or, for any reason, have relations with it, must comply with the principles and provisions contained in

this Code, as well as in any other policies of a behavioural nature adopted by the Company.

The Company will monitor the actual observance of the Code, providing adequate means of information, prevention and control and will ensure the transparency of the conduct implemented, intervening, where necessary, to sanction any actions not in line with the principles and rules of conduct of the Code.

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## **PREMISE**

### **The vision of Indra s.r.l.**

Indra srl is aware that the authority of a company is recognised not only by the competence of its employees and the high quality of the service provided to customers, but also by the attention paid to the needs of the entire community.

The principles that have always inspired the work of this company are formally collected in a Code of Ethics of Conduct in the conviction that reliability is built on a daily basis by respecting standards and valuing people.

This Code of Ethics is, therefore, a distinctive and identifying element towards the market and internal and external stakeholders, the knowledge and sharing of which, required of all those who work in the Company or collaborate with it, constitute the foundation of our business and the first step towards the pursuit of our vision.

Indra srl's objective is therefore to pursue excellence in the market in which it operates, through Sustainable Development, safeguarding the Environment and the Safety of the people involved through the coherence of a behaviour respectful of Social Ethics, guaranteeing the use of the best available and economically sustainable technologies, obtaining satisfaction and ensuring added value for the Employee, for the Customer and, in general, for the Community.

## **PURPOSE AND RECIPIENTS**

This Code of Ethics (hereinafter referred to as the 'Code') illustrates the set of ethical and moral principles underlying Indra srl's (hereinafter referred to as the 'Company') activities, as well as the lines of conduct adopted by the Company both within its own business (in relations between employees) and externally (in relations with institutions, suppliers, customers, business partners, political and trade union organisations and information bodies (hereinafter referred to as the 'Stakeholders')).

Respect for these principles is of fundamental importance to achieve Indra srl's corporate mission and to guarantee its reputation and that of its staff in the socio-economic context that it operates in.

First of all, we would like to point out that Indra srl firmly believes that every activity must be

carried out ethically, recognising itself in the principle enshrined in Article 41 of the Constitution, according to which private economic initiative 'may not be carried out in conflict with public interest or in such a way as to damage security, freedom, and human dignity.

This Code is binding without any limit of time and/or belonging to Indra srl for the directors and employees who are signatories of this code also, as well as for all those who work and collaborate, permanently or on a temporary basis, on behalf of the Company (hereinafter, the "Recipients") for whom Indra srl at its total discretion, in order to protect them, may take legal action against individuals and/or legal entities whose objectively verifiable actions may damage the image, good name and reputation of the persons involved.

The Code will be widely disseminated within the internal structure and communicated externally through its website.

Indra srl also undertakes to adopt any further provisions so that the principles and prescriptions of the Code can be promptly disseminated and applied.

## **1 GENERAL PRINCIPLES**

The conduct of the Recipients, at all levels of the company, is marked by the principles of legality, fairness, non-discrimination, confidentiality, diligence and loyalty.

### **1.1 Legality**

Indra srl operates in absolute compliance with the law and this Code.

All Recipients are therefore obliged to comply with all applicable regulations and to constantly stay abreast of legislative developments, also by taking advantage of the training opportunities offered by Indra srl.

The Company considers transparency in financial statements and accounting a fundamental principle for the conduct of its business and for the protection of its reputation.

### **1.2 Fairness**

Fairness and moral integrity are an unfailing duty for all Recipients.

The Recipients are required not to establish any privileged relationship with third parties that is the result of external solicitations aimed at obtaining improper advantages.

In the performance of their activities, the Recipients are required not to accept donations, favours or benefits of any kind (except for objects of modest value) and, in general, not to accept any consideration for the purpose of granting advantages to third parties in an improper manner.

In turn, the Recipients must not make donations of money or goods to third parties or in any case offer unlawful benefits or favours of any kind (except for objects of modest value or commercial courtesy gifts authorised by the Company) in connection with the task they perform for the benefit of Indra srl.

The intrinsic conviction of acting in the interest of the Company does not exonerate the Recipients from the obligation to punctually observe the rules and principles of this Code

### **1.3 Non Discrimination**

In relations with Stakeholders and in particular in the selection and management of personnel, in the work organisation, in the choice, selection and management of suppliers, as well as in

relations with Bodies and Institutions, Indra srl avoids and repudiates any discrimination concerning the age, sex, race, sexual orientation, state of health, political and trade union opinions, religion, culture and nationality of anyone it interacts with.

At the same time, Indra srl fosters integration, promoting intercultural dialogue, protection of the rights of minorities and the vulnerable.

#### **1.4 Gender Equality**

Indra srl is committed to actively promoting gender equality in all aspects of corporate life. The aim is to ensure that men and women have the same opportunities for professional, career development and remuneration, eliminating any form of inequality or discrimination based on gender. The Company strives to create an inclusive work environment, where each person's skills and merit are the sole criteria for evaluation, ensuring a balance in gender representation at all levels and in positions of responsibility.

#### **1.5 Confidentiality**

Indra srl is committed to ensuring the protection and confidentiality of the personal data of Recipients and Stakeholders, in compliance with the applicable data protection regulations, in accordance with national and international law.

The Recipients are required not to use confidential information, acquired in the course of their work, for purposes unrelated to the performance of that task, and in any case to always act in compliance with the obligations of confidentiality assumed by and for Indra srl towards all Stakeholders.

In particular, the Recipients are bound by the utmost confidentiality on documents disclosing know-how, transport information, business information and corporate transactions.

In addition to respecting the confidentiality of information and data acquired in the course of their work, the Recipients are required to strictly and unconditionally comply with all confidentiality agreements and contractual obligations (such as, for example, Non-Disclosure Agreements) stipulated between Indra srl and its customers, suppliers and partners.

Such agreements are a pillar of trust and commercial fairness, and their violation seriously

undermines the relationship of trust and corporate reputation.

### **1.6 Diligence**

The relationship between Indra srl and its employees is based on mutual trust: employees are therefore required to work to further the interests of the company, in compliance with the values set out in this Code.

Recipients must refrain from any activity that may conflict with Indra srl's interests by renouncing the pursuit of personal interests that conflict with the legitimate interests of the Company.

In cases where the possibility of the existence of a conflict of interest may arise, Recipients are required to refer, without delay, to their hierarchical superior so that the company may assess, and possibly authorise, the potentially conflicting activity.

In cases of violation, the Company will take all appropriate measures to put an end to the conflict of interest, reserving the right to act for its own protection.

### **1.7 Loyalty**

Indra srl and the Recipients are committed to fair competition, in compliance with national, EU and international regulations, in the knowledge that virtuous competition is a healthy incentive for innovation and development processes, and also protects the interests of consumers and the community.

## **2 RELATIONS WITH EMPLOYEES AND COLLABORATORS**

### **2.1 Recruitment**

The evaluation and selection of personnel is carried out in a fair and transparent manner, respecting equal opportunities in order to match the needs of Indra srl with the professional profiles, ambitions and expectations of the candidates.

Indra srl undertakes to adopt all useful measures to avoid any form of favouritism in the personnel selection process by using objective and meritocratic criteria, respecting the dignity of the candidates as well as in the interest of the good performance of the company.

The personnel recruited, also through the implementation of this Code, receive clear and correct information about their roles, responsibilities, rights and duties.

Indra srl repudiates and in no way tolerates the use of forced or child labour, either directly or indirectly, through its suppliers and business partners. The Company undertakes not to employ persons below the minimum age required by national and international labour laws and to conduct, with due diligence, regular checks to ensure that its supply chain also unconditionally respects this fundamental principle of human rights protection.

### **2.2 Personnel management**

Indra srl protects and enhances its human resources, committing to upholding the conditions necessary for the professional growth, knowledge and skills of each person, carrying out the appropriate training for professional updating and any initiative aimed at pursuing this goal. Indra srl promotes workers' participation in the life of the company, providing participatory tools capable of gathering workers' opinions and suggestions, guaranteeing their broadest participation.

Without prejudice to the utmost helpfulness towards the Company, no worker may be obliged to perform tasks, services or favours that are not due according to his or her contract of employment and role within the company.

The Company is firmly committed to combating episodes of mobbing, stalking, psychological



abuse and any behaviour that is discriminatory or damaging to the good name and dignity of persons of any rank or position, inside and outside company premises.

Relations between persons must be conducted with loyalty, fairness and mutual respect, in observance of the values of civil coexistence and the freedom of persons.

### **3 WORK ENVIRONMENT**

Indra srl is committed to providing its staff with a healthy, safe and dignified working environment.

Safety in the workplace is ensured both by strictly implementing the provisions of the law in force and by actively promoting a safety culture through specific training programmes. Staff training is a central element of the management system adopted. Indra srl protects the health of its workers and also ensures compliance with hygiene and preventive health regulations.

In line with Indra srl's firm commitment to the protection of workers' health, safety and dignity, the use, possession, distribution or altered state due to alcohol and/or illicit or non-prescribed drugs is strictly forbidden on company premises, during working hours or in the performance of any activity related to the company. Recipients are required to refrain from such conduct, which, in addition to constituting a serious breach of the principles of diligence and loyalty, may jeopardise their own and others' safety, productivity and corporate reputation.

Any violations will be subject to disciplinary sanctions in accordance with the law and internal regulations.

## **4 BUSINESS MANAGEMENT**

### **4.1 *Observance of internal procedures***

Indra srl believes that management efficiency and a control culture are indispensable elements for the achievement of its objectives.

Recipients are required to strictly observe the company's internal procedures and instructions laid down in the Quality UNI EN ISO 9001, Environment UNI EN ISO 14001 Management Systems and the Health and Safety Management System UNI EN ISO 45001.

Recipients must act in accordance with their authorisation profiles and must keep all appropriate documentation to keep track of actions taken on behalf of the company.

### **4.2 Accounting management**

In their accounting management activities, the Recipients are required to act in compliance with the principles of truthfulness, accuracy and transparency, so that Indra srl's reputation is protected both internally and externally.

Compliance with these principles also allows the company to plan its operational strategies according to its real economic and asset situation.

All entries in the accounts must therefore be supported by complete, clear and valid documentation, avoiding any form of omission, falsification and/or irregularity.

In the case of balance sheet or profit and loss items based on valuations and estimates, the recording thereof must be guided by criteria of reasonableness and prudence.

### **4.3 Asset protection**

Recipients are expected to respect the intellectual property, including patents, trademarks and copyrights of third parties, in accordance with national and international laws. The use of copyrighted software, documents, materials, data or other resources must be strictly in accordance with the applicable user licences and regulations. The Company undertakes to protect its own intellectual property rights and not to infringe those of others in any way, recognising that such conduct is essential to legality, fairness and the protection of its business reputation."

#### **4.4 Communication**

Indra srl provides Stakeholders with appropriate communication tools through which they can interact with the company to forward requests, ask for clarifications or make complaints.

Indra srl promotes effective corporate communication capable of putting the company in contact with civil society, in order to take on board the demands, needs and requirements of the community and to disseminate its values and mission.

Information disseminated to Stakeholders shall be complete and accurate in order to enable recipients to make correct and informed decisions.

Indra srl's advertising respects ethical values, protecting minors and repudiating vulgar or offensive messages.

## **5 EXTERNAL RELATIONS**

### **5.1 *Relations with Authorities and Public Administrations***

Relations with the Authorities and the Public Administration must be characterised by the utmost clarity, transparency and cooperation, in full compliance with the law and according to the highest moral and professional standards.

The Recipients, unless expressly authorised, may not act in the name and on behalf of Indra srl with the Authorities and the Public Administration.

In relations with Public Officials, Persons in Charge of a Public Service, and the Public Administration in general, the authorised Recipients shall abide by the highest standards of fairness and integrity, refraining from any form of pressure, explicit or veiled, aimed at obtaining any undue advantage for themselves or for Indra srl.

In this regard, authorised Recipients will be required to strictly comply with the provisions of this Code, as well as, more generally, with the directives issued by Indra srl management.

### **5.2 *Relationships with political and trade union organisations***

Indra srl does not favour or discriminate against any political organisation or trade union.

The Company refrains from making any undue contribution in any form whatsoever to parties, trade unions or other social formations, except for specific derogations and in any case always within the limits of what is permitted by the laws in force.

The Recipients are required to refrain from any direct, indirect or purported pressure on political or trade union representatives.

### **5.3 *Relationship with customers and suppliers***

Recipients shall deal with third parties with courtesy, competence and professionalism, in the conviction that the protection of the company's image and reputation, and consequently the achievement of the company's objectives, depends on their conduct.

In particular, the Recipients must refrain from any form of unfair or deceptive behaviour that

could induce customers or suppliers to rely on unfounded facts or circumstances.

Recipients are expected to make constant efforts to offer punctual and high-quality services to customers, seeking to limit any form of disservice or delay in order to maximise customer satisfaction.

Relations with suppliers are characterised by loyalty, fairness and transparency.

Suppliers are chosen on the basis of objective criteria of cost-effectiveness, opportunity and efficiency.

The choice of suppliers on purely subjective and personal grounds or, in any case, on the basis of conflicting interests is precluded.

The Recipients must put in place every possible control so that suppliers and customers are also able to comply with the fundamental ethical principles set out in this Code.

## **6 INTERNAL CONTROL SYSTEM**

Compliance with the prescriptions of this Code is entrusted to the prudent, reasonable and careful supervision of each of the Recipients, within their respective roles and functions inside and outside the company.

All Recipients are invited to report to their direct superiors facts and circumstances potentially in conflict with the principles and prescriptions of this Code.

The management of Indra srl and the bodies appointed for this purpose shall take all necessary measures to put an end to violations, and may resort to any disciplinary measures in compliance with the law and workers' rights, including trade union rights.

## **7 PENALTY SYSTEM GUIDELINES**

The internal control system is geared towards the adoption of tools and methodologies to counter potential business risks, in order to ensure compliance not only with the law, but also with internal provisions and procedures.

In fact, the violation of the principles laid down in the Code and in the procedures indicated in the internal controls compromises the relationship of trust between the Company and its directors, employees, consultants, collaborators in various capacities, customers, suppliers, commercial and financial partners.

Such violations will be prosecuted in accordance with the current legal provisions in force and the relevant national collective labour agreements, in proportion to the seriousness of the facts.