

## Indra srl

ETHICAL CODE  
Rev.0 of 01/01/2018

### INTRODUCTION

Indra srl (hereinafter, also the "Company") has always paid great attention to the ethical aspects of the company and considers legality and correctness as essential conditions for the conduct of its business.

In carrying out its business, in fact, the Company intends to observe not only the laws and the laws provisions in force in all the countries in which it operates, but also the high ethical standards and principles inspirers who are collected in this code of ethics. This Code is an integral part of the Organization, Management and Control Model adopted by the Company and contains the ethical principles that the Company considers fundamental in carrying out its business and the behavioral standards that all those acting in the Company's name must respect.

Consequently, whoever works in the Company's departments or works with it or, in any way, maintains relations with the Company, must comply with the principles and provisions contained in the present Code, as well as in any other behavioral policies, however adopted from society.

The Company will oversee the effective observance of the Code, preparing suitable instruments for information, prevention and control and will guarantee the transparency of the conduct undertaken, intervening, where necessary, to sanction any actions not in line with the principles and rules behavioral codes of the Code.

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## *PREMISE*

*The vision of Indra srl*

*Indra srl is aware that the authority of a company is recognized not only by the expertise of its employees and the high quality of 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 Conduct Ethics in the belief that reliability is built every day by respecting the rules and valuing people.*

*This Code of Ethics represents, therefore, a distinctive and identifying element towards the market and the internal and external stakeholders, whose knowledge and sharing, required to all those who work in the Company or cooperate with it, constitute the foundation of our activity and the first step to contribute to the pursuit of our vision.*

*The goal of Indra srl is therefore to pursue excellence in the market in which it operates, through a Sustainable Development, safeguarding the Environment and Safety of the people involved through the consistency of a respectful behavior of Social Ethics, obtaining satisfaction and to ensure added value for the Employee, for the Client and, in general, for the Community.*

## **PURPOSE AND RECIPIENTS**

This Code of Ethics (hereinafter, the "Code") illustrates the ethical and moral principles that underlie the activity of Indra srl (hereinafter, "the Company") as well as the behavioral lines adopted by the Company 'internal activity (in relations between employees) and outside (in relations with institutions, suppliers, customers, business partners, political and trade union organizations and the media (hereinafter, the "Interest Bearers").

Compliance with these principles is of fundamental importance for reaching Indra srl' s corporate mission and for guaranteeing its reputation and personnel in the socio-economic context in which it operates.

Preliminarily it is emphasized that Indra srl firmly believes that every activity must be carried out ethically, recognizing itself in the principle enshrined in art. 41 of the Constitution, according to which the private economic initiative "cannot be carried out in contrast with the social utility or in such a way as to damage the security, freedom and human dignity".

This Code is binding without any time limit and / or belonging to Indra srl for the directors and employees subscribers of this code, as well as for all those who work and collaborate, on a permanent or fixed-term basis, on behalf of the Company (hereafter, the "Recipients") for which Indra srl in its total discretion, to protect them, may initiate legal actions against natural and / or legal persons whose actions objectively verifiable should damage the image, the good name and the reputation of the persons involved.

The Code will be widely distributed within the internal structure and external communication through its website.

Indra srl also undertakes to adopt any further provision so that the principles and provisions of the Code can be duly disclosed and applied.

## 1. GENERALPRINCIPLES

*The conduct of the Recipients, at all company levels, is based on the principles of legality, correctness, non-discrimination, confidentiality, diligence, and loyalty*

*1.1 Legality Indra srl operates in full compliance with the law and this Code. All Recipients are therefore required to comply with all applicable regulations and to constantly update on legislative developments, also making use of the training opportunities offered by Indra srl.*

*The Company considers the transparency of financial statements and accounting a fundamental principle for the exercise of its business and for the protection of its reputation. Correttezza*

*1.2 Correctness and moral integrity are an indefectible duty for all Recipients. The Recipients are required not to establish any special relationship with third parties, which is the result of external solicitations aimed at obtaining improper advantages. In carrying out their activities, the Recipients are required not to accept donations, favors or utilities of any kind (except for objects of modest value) and, in general, not to accept any consideration in order to grant advantages to third parties in an improper manner.*

*In turn, the Recipients must not make donations in cash or goods to third parties or otherwise offer illicit benefits or favors of any kind (except for objects of modest value or gifts of commercial courtesy authorized by the Company) in connection with the activity they lent for the benefit of Indra srl.*

*The intrinsic conviction of acting in the interests of the Company does not exonerate the Recipients from the obligation to comply promptly with the rules and principles of this Code*

*1.3 Non-discrimination In relations with Interest Holders and in particular in the selection and management of personnel, in the work organization, in the selection, selection and management of suppliers, as well as in relations with Institutions and Institutions, Indra srl avoids and rejects any discrimination concerning the age, sex, race, sexual orientation, state of health, political and trade union opinions, religion, culture and nationality of its interlocutors. Indra srl, at the same time, fosters integration, promoting intercultural dialogue, protecting the rights of minorities and vulnerable people.*

### 1.4 Confidentiality

*Indra srl undertakes to ensure the protection and confidentiality of the personal data of Recipients and Stakeholders, in compliance with all applicable regulations regarding the protection of personal data.*

*The Recipients are required not to use confidential information, learned by reason of their work, for purposes unrelated to the exercise of such activity, and in any case to act always in compliance with the confidentiality obligations assumed by and for Indra srl towards all Interest Holders.*

*In particular, the Recipients are bound by strict confidentiality on documents suitable for disclosing know-how, transport information, commercial information and corporate transactions.*

### *1.5 Diligence*

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

*The Recipients must refrain from any activity that could constitute a conflict with the interests of Indra srl, renouncing the pursuit of personal interests in conflict with the legitimate interests of the Company.*

*In cases in which the possibility of existence of a conflict of interests can be represented, the Recipients are required to contact, without delay, their hierarchical superior so that the company can evaluate, and possibly authorize, the potentially conflicting activity.*

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

### *1.6 Loyalty*

*Indra srl and the Recipients are committed to achieving 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 RELATIONSHIPS WITH EMPLOYEES AND COLLABORATORS

### *2.1 Selection of personnel*

*The evaluation and selection of personnel are carried out according to correctness and transparency, respecting equal opportunities in order to combine the needs of Indra srl, with the professional profiles, ambitions and expectations of the candidates.*

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

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

### 2.2 Personnel Management

Indra srl protects and enhances its human resources, committing itself to maintain constant the conditions necessary for professional growth, knowledge and skills of each person, making the appropriate training for professional updating and any initiative aimed at pursuing this goal.

Indra srl promotes the participation of workers in the life of the company, providing participatory tools able to collect the opinion and suggestions of workers, ensuring their broader participation.

Without prejudice to the maximum availability to the Company, no worker may be required to perform duties, services or favors not due according to their employment contract and their role within the company. The Company is firmly committed to combating incidents of mobbing, stalking, psychological violence and any conduct that discriminates or harms the good name and dignity of the person of any

grade and task, inside and outside the company premises.  
Relations between people must take place with loyalty, correctness and mutual respect, in observance of the values of civil coexistence and of the freedom of people

### 3 WORKENVIRONMENT

Indra srl is committed to offering its staff a healthy, safe and respectful working environment for workers' dignity. Safety in the workplace is ensured both by strictly implementing the provisions of the law in force and by actively promoting the culture of safety through specific training programs. Staff training is a central element of the management system adopted. Indra srl protects the health of its workers, also ensuring compliance with hygiene and health prevention regulations

### 4 MANAGEMENT OF THE COMPANY

*4.1 Compliance with internal procedures Indra srl believes that management efficiency and the culture of control are essential elements for achieving the objectives. The Recipients are required to strictly comply with the procedures and instructions within the company provided for in the Management Systems present in UNI EN ISO 9001 and 14001, and the 18001 health and safety management system.*

*Recipients must act on their respective authorization profiles and must retain all appropriate documentation to track actions taken on behalf of the company*

#### *4.2 Account management*

*In the accounting management activity, the Recipients are called to act in compliance with the principles of truthfulness, accuracy and transparency, in order to protect the reputation of Indra srl both internally and externally. Compliance with these principles also allows the company to plan its operating strategies based on its real economic and financial situation. All items reported 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 assets or economic elements based on valuations and estimates, the related registration must be based on criteria of reasonableness and prudence.*

#### *4.3 Protection of assets*

*Recipients exercise their functions trying to rationalize and contain the use of company resources.*

*The Recipients are required to correctly apply the security provisions to protect the hardware devices from unauthorized access, which could seriously damage the personal data protection rights of Indra srl' s staff and customers*

#### *4.4 Communication*

*Indra srl makes available to the Interest Bearers suitable communication tools through which they can interact with the company to forward requests, request clarifications or make complaints. Indra srl promotes an effective corporate communication able to put the company in touch with civil society, in order to incorporate the needs, needs and needs of the community and to spread its*

*values and its mission. The information disseminated to the Stakeholders is complete and accurate so that recipients are allowed to make correct and informed decisions. Indra srl advertising promotion respects ethical values, protecting minors and repudiating vulgar or offensive messages.*

## **5. EXTERNAL RELATIONSHIPS**

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

*Relations with the Authorities and with the Public Administration must be based on the utmost clarity, transparency and collaboration, in full compliance with the law and according to the highest moral and professional standards.*

*The recipients, unless expressly authorized, cannot relate in the name and on behalf of Indra srl with the Authorities and with the Public Administration.*

*In relations with the Public Officials, with the Public Service Officers, and with the Public Administration in general, the Authorized Recipients land at the highest levels of correctness and integrity, refraining from any form of pressure, explicit or veiled, aimed at obtaining any advantage undue for oneself or Indra srl.*

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

**5.2 Relations with political and trade union organizations** *Indra srl does not favor or discriminate against any political or trade union organization.*

*The Company abstains from providing any undue contribution in any form to parties, trade unions or other social groups, except for specific exceptions and in any case always within the limits of what is permitted by current regulations.*

*The Recipients are required to refrain from any direct, indirect or positive pressure against politicians or trade union representatives*

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

*Recipients relate to third parties with courtesy, competence and professionalism, in the belief that their conduct depends on the protection of the image and reputation of the company and consequently the achievement of corporate objectives.*

*In particular, Recipients must refrain from any form of unfair or deceptive behavior that may induce customers or suppliers to rely on unfounded facts or circumstances.*

*The Recipients are obliged to work consistently to provide timely and high quality services to customers, trying to limit any form of disruption or delay in order to maximize customer satisfaction.*

*Relations with suppliers are based on loyalty, correctness and transparency.*

*The selection of suppliers is made on the basis of objective criteria of economy, opportunity and efficiency.*

*The choice of suppliers on purely subjective and personal grounds or, in any case, by virtue of interests conflicting with those of companies, is precluded.*

*The Recipients must carry out every possible control so that even suppliers and customers are able to comply with the fundamental ethical principles set forth in this Code.*

## 6. INTERNAL CONTROL SYSTEM

Compliance with the provisions of this Code is entrusted to the prudent, reasonable and careful supervision of each of the Recipients, within their respective roles and functions both inside and outside the company. All Recipients are invited to report to their immediate superiors facts and circumstances potentially in contrast with the principles and provisions of this Code.

The management of Indra srl and the appropriate bodies take all necessary measures to put an end to the violations, being able to resort to any disciplinary measure in compliance with the law and the rights of workers, including trade union rights.

## 7. GUIDELINES OF THE SANCTION SYSTEM

The internal control system is oriented towards the adoption of tools and methodologies aimed at combating potential business risks, in order to ensure compliance not only with laws, but also with internal provisions and procedures.

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

These violations will be prosecuted according to the current legislative provisions in force and the CCNL of the category, in proportion to the seriousness of the facts.