

Indra Group Corporate Communications, Branding, and Sponsorship Policy¹

1. PURPOSE AND SCOPE

This Corporate Communications, Branding, and Sponsorship Policy (hereinafter, the “**Policy**”), approved by the Board of Directors of Indra Sistemas, S.A. (hereinafter “**Indra Group**” or the “**Company**”), aims to define the principles, objectives, and guidelines that will inform decisions regarding corporate communications, branding, and the granting of sponsorships (collectively, the “**Communication Functions**”) and to ensure the existence of robust procedures that guarantee compliance with applicable regulations in the various countries and territories where the companies comprising the Indra Group conduct their business activities.

This Policy is mandatory and applies globally and directly to all companies comprising the Indra Group, regardless of their geographic location, and is binding on all their employees, regardless of their position or role.

2. GUIDING PRINCIPLES

The following principles shall guide the Company’s actions in the performance of Communication Functions:

- **Integrity, truthfulness, and consistency.** Communication Functions must comply with the Indra Group Code of Ethics and Legal Compliance and its implementing guidelines, as well as with the applicable regulations in each of the territories where they are carried out. They must also be truthful and consistent with the other guiding principles set forth in this section.
- **Objectivity, diversity, and editorial independence.** The selection, contracting, and allocation of resources to media outlets and news agencies, as well as the implementation of sponsorships and brand-building initiatives, shall be carried out in accordance with objective, traceable, non-ideological, and non-discriminatory criteria, ensuring adequate diversity and preserving, in all cases, the editorial independence of the media outlets with which contracts are entered into.
- **Strategic alignment and business focus.** Every initiative must contribute to the Indra Group’s strategic objectives and to the Company’s business priorities and objectives, whether in the short, medium, or long term.
- **Efficiency.** Resources allocated to the Communications Functions must be managed based on criteria of utility, contribution to the business, and budgetary discipline. The mere availability of a budget will not justify an action or contract.
- **Innovation.** Whenever possible, formats, channels, and narratives consistent with the Indra Group’s technological positioning will be promoted.
- **Relevance.** The Company will prioritize actions capable of generating the greatest strategic impact on its stakeholders.
- **Institutional Responsibility.** All actions must preserve the institutional trust required by the nature of Indra Group’s critical activities and capabilities.
- **Value Creation for Stakeholders.** The Communications Functions must take into account the creation of value not only for the Company but also for its stakeholders.
- **Diversity.** The Communications Functions must incorporate the values of gender equality and respect for, and promotion of, social and cultural diversity.

¹ Any reference to the Indra Group and the Company shall be understood to refer both to Indra Sistemas, S.A. and to all legal entities comprising the Group of Companies of which Indra Sistemas, S.A. is the parent company.

- **Proportionate evaluation.** Actions will be evaluated in a straightforward manner and in proportion to their relevance, using the information necessary to assess their usefulness and draw lessons learned.

3. ACTION CRITERIA

3.1. Corporate Communication

3.1.1. Institutional Communication

Institutional communication must:

- explain the Indra Group's corporate strategy;
- strengthen its reputation;
- support its technological positioning; and
- consolidate institutional relationships.

Under no circumstances should it be used for purely promotional purposes unrelated to the strategy.

3.1.2. Digital Communication

Digital communication must ensure:

- narrative consistency;
- prompt responsiveness;
- technical quality;
- accessibility;
- protection of the Indra Group's reputation; and
- the responsible use of artificial intelligence.

3.1.3. Relations with the Media and News Agencies

Relations with the media and news agencies must be based on the following criteria:

- transparency;
- objectivity;
- technical rigor and accuracy;
- equal access; and
- respect for editorial independence.

Economic relationships with media outlets may not be used to influence their editorial line or to condition the publication, modification, withdrawal, or omission of information. Advertising, sponsored, or commercial content must be adequately distinguished from editorial content in accordance with applicable regulations and professional practices.

The selection of media outlets will be based on objective criteria of digital audience reach (maximizing the communication's reach among the population and using standardized measurement tools that are comparable across media outlets) and diversification (in the case of media outlets specializing in specific audience segments or professional audiences, where the digital audience criterion may be adjusted). Media outlets contracted with Indra must comply with the ethical obligations required of all Indra service providers and, in particular, respect the principles of integrity, truthfulness, and professionalism.

In this regard, the determination of the financial benchmarks applicable to media outlets must be based on previously defined criteria and parameters that are consistent, objective, traceable, and verifiable. To this end, prior to each fiscal year, eligibility thresholds, measurement sources and periods, allocation ratios or formulas, and—where applicable—specific criteria for economic, regional, or specialized media will be established.

The application of these parameters must ensure that comparable media outlets receive proportional financial treatment in accordance with a single methodology. Any material deviation from the general allocation criteria must be objectively justified and expressly documented.

The establishment of a financial benchmark shall not imply any obligation to enter into a contract or incur an expense, which shall be contingent upon the existence of a specific communication need, budgetary availability, and compliance with applicable internal procedures.

Likewise, news agencies will be selected based on the specific characteristics of their information distribution function; factors that may be considered include, among others, the accredited number of client or recipient media outlets, the dissemination of third-party content, territorial coverage, news production, specialization, national and international reach, and relevance to the Indra Group's stakeholders.

3.1.4. Internal Communication

Internal communication must promote:

- strategic alignment;
- pride in belonging to the Company;
- collaboration;
- corporate culture; and
- engagement.

Employees are the brand's primary ambassadors.

3.2. Brand Management

Any use of the brand must:

- preserve its integrity;
- maintain visual consistency;
- protect the brand's technological positioning; and
- avoid associations that are incompatible with the corporate reputation.

The brand architecture must be applied consistently across all Group companies.

3.3. Sponsorships and Corporate Events, Donations, and Memberships

For the purposes of this Policy, "Sponsorship" shall be understood to mean the act of supporting or financing an activity, typically for advertising purposes or to enhance the image of the company and its brands, or in exchange for a benefit serving a similar purpose.

Sponsorships and corporate events are tools for the Company's positioning, institutional relations, and communication and must align with clearly identified strategic objectives.

Only initiatives of sufficient relevance and prestige—whether national, international, regional, or local—may be promoted or supported, provided they are aligned with the Indra Group's strategy

and brand, are appropriate for its stakeholders, and offer specific, proportionate, and verifiable benefits, while respecting, in all cases, the principles of reasonableness, proportionality, and prudence set forth in the Indra Group Code of Ethics and Legal Compliance. Mere brand visibility shall not, in and of itself, constitute sufficient justification.

Sponsorship arrangements that do not provide sufficiently distinctive corporate value or that could compromise the proper separation between communication, sponsorship, and editorial independence will be excluded.

In particular, Indra may not sponsor prizes, awards, or recognitions promoted or organized by media outlets, publishing groups, or affiliated entities, regardless of their name or format, including the sponsorship of categories, galas, award ceremonies, or equivalent events. This exclusion stems from the need to focus investment on initiatives with a sufficiently distinct institutional, business, or sector-specific purpose and to maintain a clear separation between sponsorship and ordinary relations with the media.

This Policy also applies to donations that the Indra Group may make in accordance with its principles and objectives, as well as those that, in line with the Indra Group's social responsibility and commitment to the communities in which it operates, it may make to address specific aid needs, such as in the case of natural disasters or humanitarian assistance.

Any request for membership or affiliation, as well as the initial endowment or contribution to a foundation, public-benefit association, other associations, institution, forum, or any other similar entity, shall also be subject to this Policy.

4. GOVERNANCE

4.1. Governance Model

The management of Communication Functions is a responsibility shared by all Indra Group employees and will be carried out in accordance with the following institutional structure:

Board of Directors

The Board of Directors is responsible for:

- Approve, upon the recommendation of the Corporate Communications, Branding and Sponsorship Committee (the “**Committee**”), the annual corporate strategy for the Communication Functions and exercise ultimate oversight of its implementation by the Company.
- Approve the Policy and any subsequent amendments thereto upon the Committee's recommendation.
- Approve sponsorships, donations, and memberships whose total amount exceeds 500,000 euros.

Corporate Communications, Branding and Sponsorship Committee

The Committee is responsible for:

- To prepare the proposed annual corporate strategy regarding communications, branding, and sponsorship for approval by the Board of Directors.
- Approve relevant actions related to Communication Functions that, due to their strategic, reputational, or economic importance, must be submitted for its consideration and that do not fall within the express jurisdiction of the Board of Directors.

- Annually approve the criteria, parameters, and eligibility thresholds; sources and measurement periods; allocation ratios or formulas; and, where applicable, the specific criteria applicable to economic, regional, or specialized media.
- Approve sponsorships, donations, and memberships totaling less than 500,000 euros and refer those involving a higher amount to the Board of Directors.
- Approve contracts with media outlets, news agencies, and communications agencies and consulting firms, regardless of their value.
- Oversee the implementation and compliance with the Policy.
- Resolve any questions of interpretation that may arise regarding the Policy and verify and resolve cases of possible non-compliance with the principles of integrity, accuracy, and professionalism by media outlets in connection with the publication of false or speculative information that harms the Company.
- Propose, if appropriate, amendments to the Policy to the Board of Directors.
- Report periodically, and at least annually, to the Board of Directors on the implementation of the corporate communications strategy and on the measurements and assessments related to Communication Functions.
- Approve the standard contract template with media outlets and news agencies that the Company must use.

Corporate Communications, Marketing and Branding Area

The Corporate Communications, Marketing and Branding Area is responsible for:

- Develop the corporate communications strategy approved by the Board of Directors upon the Committee's recommendation.
- Coordinate institutional communications.
- Promote the necessary initiatives to safeguard the brand's identity and positioning;
- Coordinate actions to promote and protect the Indra Group's reputation.
- Select media outlets, news agencies, and communications agencies and consulting firms, and propose their engagement to the Committee.
- Define the model for measuring and evaluating activities related to communication functions for approval by the Committee.

Corporate Areas and Business Units

It is the responsibility of Corporate Areas and Business Units to:

- Incorporate Communication Functions as part of business management in accordance with the terms set forth in this Policy.
- Coordinate their activities with the Corporate Communications, Marketing, and Branding Area.
- Ensure compliance with and the proper implementation of this Policy.

4.2. Corporate Communications, Branding and Sponsorship Committee

Nature

The Committee is the collegial body responsible for directing, coordinating, and supervising the actions falling within the scope of this Policy.

The Committee's purpose is to ensure that decisions regarding communications, branding, and sponsorship are made in accordance with criteria of strategic alignment, value creation, reputation protection, efficient use of resources, risk management, and regulatory compliance, thereby ensuring consistent conduct across all Group companies.

Composition

The Committee shall consist of the following permanent members:

- The head of the **Communications, Marketing and Branding Area**, who will serve as Chair.
- The head of the **Legal Affairs Area**.
- The head of the **Management Control Area**.

The head of the **Compliance Area** shall serve as **Secretary of the Committee**, with voice but no vote, and shall be responsible for ensuring the proper functioning of the Committee from the perspective of regulatory compliance and corporate governance, preparing meeting notices, coordinating documentation, taking minutes of meetings, safeguarding documentation, and following up on adopted resolutions.

When the nature of the matters so requires, the Chair may invite, with the right to speak but not to vote, heads of other corporate areas, business units, or Group companies, as well as internal or external experts whose participation is deemed appropriate for the proper analysis of the matters under consideration.

Operating Procedures

The Committee shall meet regularly at least once per quarter and, on an extraordinary basis, when so decided by its Chair or upon the request of at least two of its members.

The Committee shall be validly constituted when the Chair, the Secretary, and at least a majority of its members with voting rights are present.

Decisions shall be adopted by consensus whenever possible. When this is not possible, they shall be adopted by a simple majority of the members present and entitled to vote.

Minutes shall be taken at each meeting, recording the attendees, the matters discussed, the resolutions adopted, the responsibilities assigned, and the deadlines established for their implementation. The minutes shall be kept by the Committee's Secretary.

The Secretary shall ensure that the Committee's deliberations and resolutions comply with this Policy, the Code of Ethics and Legal Compliance, the Compliance Model, the Company's internal regulations, and applicable law, and may record in the minutes any observations deemed relevant from the perspective of regulatory compliance and good corporate governance.

5. CONTRACTING WITH MEDIA OUTLETS AND NEWS AGENCIES

5.1. Contractual Arrangements

All contracts must comply with the Company's supplier contracting guidelines, with the involvement of Corporate Procurement and the Corporate Communications, Marketing and Branding Area, and must be executed using the standard contract approved by the Committee, subject to any justified modifications required by the nature of each service. The contract shall specifically and verifiably identify the contracted services, duration, price, formats, deliverables, and, where applicable, performance indicators.

5.2. Purpose of the Contract

The subject matter shall consist of the provision of communication, dissemination, and institutional or corporate presence services for the Company in the media outlet's platforms and channels,

through the expressly contracted activities. Advertising or sponsored content must be identified as such when required. The contract shall expressly recognize the media outlet's editorial independence and autonomy.

5.3 Editorial Independence

The contracting of services shall not confer upon the Company any right to interfere with the media outlet's independent editorial activity. No consideration may be conditioned on the publication of favorable information, the removal or modification of information, the absence of criticism, or any other action incompatible with journalistic independence.

5.4 Annual Record

The entity responsible for each contract with media outlets and agencies shall maintain and prepare an annual record that allows for the reconstruction of the allocation process and contains, at a minimum, the budget, the pool of media outlets considered, reach and audience, the criteria and parameters applied for financial allocation, measurement sources and periods, resulting financial benchmarks, and justification for material deviations, tools for evaluating the services received, formalized contracts, and evidence of services rendered. This record shall be communicated to the Corporate Communications, Marketing and Branding Area for its information and that of the Committee.

5.5. Conflicts of Interest

Individuals involved in the selection, evaluation, negotiation, or approval of media must comply with internal rules regarding conflicts of interest and recuse themselves whenever any circumstance arises that could compromise their impartiality.

6. ENGAGEMENT OF COMMUNICATIONS AGENCIES AND CONSULTING FIRMS

6.1 Purpose

Communications consulting is a fully recognized activity in the business world and adds value to the Company through specialized advice, the provision of human and material resources for project management, and the delivery of services based on technical or industry-specific expertise.

Communication agencies and consulting firms, which are legally established and equipped with adequate human and material resources, may provide specialized support to the Company in managing its communications, reputation, and relationships with its various stakeholders.

To this end, they may carry out, among other things, strategic advisory work, media relations, content creation and dissemination, reputation management, crisis communication, and support for communications directed at employees, investors, customers, suppliers, shareholders, and society at large.

Services related to public affairs, institutional relations, advocacy, or political and regulatory engagement fall outside the scope of this Policy; the contracting of such services must be carried out in accordance with the rules and procedures specifically applicable to those activities.

6.2 Selection of Agencies and Consulting Firms

The selection of suppliers will generally be carried out through competitive procedures that allow for the comparison of different alternatives and ensure competition, transparency, quality, and cost-effectiveness in the contracting process.

These processes will be conducted in accordance with the Company's supplier contracting rules, with the participation of Corporate Procurement and the Corporate Communications, Marketing and Branding Area, without prejudice to the involvement of other corporate functions when necessary due to the nature of the service.

The Corporate Communications, Marketing and Branding Area will serve as the lead unit and bear technical responsibility for contracts entered into under this Policy and must verify that their scope is effectively limited to communications services.

The fact that a firm offers other professional services in addition to communications services shall not preclude its engagement, provided that the proposal, the quote, the deliverables, and the contract clearly define the communications services that are the subject of the engagement.

Public affairs services may not be incorporated into contracts subject to this Policy through scope expansions, work orders, hour pools, or other contractual mechanisms.

Contracts with communications agencies and consulting firms must be approved by the Committee.

6.3 Contracting

All contracts must comply with the Company's supplier contracting policies and be executed using the standard contract approved by the Committee, subject to any justified modifications required by the nature of each service. The contract shall specifically and verifiably identify the contracted services, duration, price, formats, deliverables, and, where applicable, performance indicators.

6.4 Annual Record

The entity responsible for each contract with agencies and consulting firms shall maintain and prepare an annual record that allows for the reconstruction of the award process and contains, at a minimum, the budget, the pool of agencies or consulting firms considered, tools for evaluating the services received, formalized contracts, and evidence of the services rendered. This record shall be submitted to the Corporate Communications, Marketing and Branding Area for its information and that of the Committee.

6.5. Conflicts of Interest

Individuals involved in the selection, evaluation, negotiation, or approval of agencies and consultants must comply with internal rules regarding conflicts of interest and recuse themselves whenever any circumstance arises that could compromise their impartiality.

7. SPONSORSHIPS, DONATIONS, AND MEMBERSHIPS

7.1. Purpose

This Policy governs the procedures applicable to the request, approval, and recording of the Company's donations and sponsorships, as well as applications for and approval of membership in, or affiliation with, foundations, public-benefit associations, or any other similar entities, and the contributions made to them.

Sponsorships may pertain to institutional, business, sector-specific, technological, academic, or initiatives of economic and social interest—whether national, regional, or international—provided they comply with the principles of relevance, prestige, strategic alignment, proportionality, and consideration established in this Policy.

For these purposes, initiatives are considered suitable for potential participation or sponsorship if, due to their prestige, ability to attract participants, the quality of their participants, relevance to the Company's stakeholders, and alignment with its strategic priorities, they constitute institutional, business, technological, or sector-specific platforms of special interest.

The following are expressly excluded from the scope of this Policy:

- contributions made to entities in compliance with the legal obligation established in Royal Legislative Decree 1/2013, of November 29, approving the Consolidated Text of the General Law on the Rights of Persons with Disabilities and Their Social Inclusion, without prejudice to the obligation to register such contributions as regulated below in section 8.5; and
- membership applications relating to entities that do not involve a monetary contribution or the assumption of present and/or future obligations for the Indra Group.

Likewise, this Policy expressly includes requests for patronage as provided for in Law 49/2002, of December 23, on the tax regime for nonprofit organizations and tax incentives for patronage.

7.2. Requests for and Authorization of Donations and Sponsorships.

Any request for a donation or sponsorship to an entity must be made in writing by professionals holding at least the position of Director and submitted by the relevant General Manager to the Corporate Communications, Marketing and Branding Area for processing in accordance with the authorization process depending on the amount, as outlined below:

- Amount less than 500,000 euros: approval by the Committee.
- Amount equal to or greater than 500,000 euros: approval by the Board of Directors upon the Committee's proposal.

Amounts related to the same initiative, event, program, or set of substantially related activities shall be calculated in aggregate and may not be split to circumvent the above authorization thresholds. Once the threshold of 500,000 euros per beneficiary entity per calendar year has been reached for donations and sponsorships, if additional initiatives are requested in that calendar year in favor of that entity—regardless of their amount—the authorization process applicable to initiatives of 500,000 euros or more shall be followed.

If the donation or sponsorship requires the execution of any type of agreement or contract, it shall be forwarded, once authorized, to the Legal Affairs Area for review and analysis.

In any case, the authorizing body may consult with the Compliance Unit regarding the appropriateness of the proposed donation or sponsorship.

Based on the comprehensive analysis conducted, the authorizing body will make the final decision regarding the requested initiative, either approving or rejecting it and informing the applicant in writing of the decision. If the initiative is approved, the applicant will be responsible for forwarding the approved donation or sponsorship to the Tax Area for the appropriate purposes.

7.3. Application for and Authorization of Membership in Foundations, Public-Benefit Associations, or Other Similar Entities. Regular Dues or Contributions

Any request for membership or affiliation, as well as the initial endowment or contribution to a foundation, public-benefit association, other association, institution, forum, or any other similar entity, must be submitted with a justification by professionals holding at least the position of Director and forwarded by the competent General Manager to the Corporate Communications, Marketing and Branding Area for processing in accordance with the authorization process depending on the amount, as outlined below:

- Amount less than 500,000 euros: approval by the Committee.
- Amount equal to or greater than 500,000 euros: approval by the Board of Directors upon the Committee's recommendation.

With regard to these initiatives, the following considerations shall also be taken into account:

- Annual reviews of regular dues or contributions: if the annual fee to be paid by the Indra Group in its capacity as a trustee, associate, or member of any of the entities covered in this section increases compared to the annual fee paid in the previous fiscal year, the applicant must follow the aforementioned authorization process in accordance with the quantitative limits established based on the resulting fee.
- Otherwise, to renew a membership—up to a maximum of two renewals—the applicant must be a professional holding at least the position of Director. After this period has elapsed, if it is decided to maintain the membership, the applicant must follow the aforementioned authorization process in accordance with the quantitative limits indicated above.
- One-time contributions: If contributions other than ordinary contributions are requested in favor of the entities regulated in this section, the applicant must follow the aforementioned authorization process in accordance with the quantitative limits established therein.

In general, once the amount of €500,000 per beneficiary entity per calendar year has been reached for any purpose, if additional contributions are requested in that calendar year in favor of that entity—regardless of their amount—the authorization process applicable to contributions of €500,000 or more must be followed.

Annual Reviews: Membership in any of the entities mentioned in this section must be reviewed annually; to this end, the authorizing body will request from the applicant or the correspondent area or market seeking to maintain membership a written statement justifying the appropriateness and suitability of continuing membership in said entity. The authorizing body will forward the bylaws, membership agreements, or other relevant documentation to the Legal Affairs Area for review and analysis.

In any case, the authorizing body may consult with the Compliance Unit regarding the appropriateness of the proposed membership or contribution request.

Additionally, for initiatives proposed in high-risk countries (with a score of 36 points or lower according to the “Corruption Perceptions Index” published annually by Transparency International), the Compliance Area will conduct a reputational assessment of the entities referred to at the beginning of this section, using the report obtained from the Thomson Reuters/Refinitiv World Check tool or a similar service. The Compliance Unit will forward the results of this assessment to the authorizing body.

Furthermore, if the entity referred to at the beginning of this section operates in any of the Group’s relevant geographic regions (Spain, Italy, Brazil, Colombia, Mexico, Peru, and the Philippines) and is of particular relevance with regard to climate change (associations linked to activities in the transportation, energy, and industrial sectors, as well as associations focused on innovation and the environment), the authorizing body will request that the Sustainability Area verify that said entity does not contradict the Indra Group’s climate strategy. The Sustainability Area will report the results of this review to the authorizing body, indicating whether the entity is aligned, partially aligned, or not aligned with the Paris Agreement. If the entity is not aligned with the Agreement, it will be recommended that the request be rejected and that the applicant be informed in writing of the reasons. If the authorizing body decides to accept the request, the Sustainability Area will be informed, and it will publish a statement distancing the company from the climate position of that association.

Based on the comprehensive analysis conducted, the authorizing body will make the final decision regarding the requested initiative, its contributions, and revisions, either approving or rejecting them and informing the applicant in writing of the decision made. If the initiative or request is approved, the applicant will be responsible for forwarding the approved initiative to the Tax Area for the appropriate purposes.

7.4 Allocation of Resources, Allocation of Costs to Projects, and Authorization of Payments

As a general rule, the area requesting the donation, sponsorship, endowment, contribution, or membership fee must bear its cost. The cost will be allocated to a structural cost project within the relevant requesting area.

To ensure traceability, the cost of the donation, sponsorship, endowment, contribution, and/or fee must be linked to the specific accounting account titled “Donations and Foundations.”

In any case, the Corporate Communications, Marketing and Branding Area will provide support to the various areas to ensure that collaboration with these entities is carried out in a manner consistent with Indra Group’s corporate communications and brand.

In the case of in-kind donations through the free provision of services to an organization, costs will be allocated to the accounting systems in accordance with the “Dedications” system, which is integrated into the GEP tool.

Payment, in any case, will follow the authorization procedures set forth in the applicable internal regulations (AFE).

7.5. Recording

The Corporate Communications, Marketing and Branding Area will maintain a record for each of the following items:

- donations and sponsorships made in accordance with section 8.2;
- applications for membership or affiliation, endowments or initial contributions, and regular dues or contributions made to foundations, public-benefit associations, other associations, or any other similar entities in accordance with Section 8.3; and
- donations, sponsorships, and contributions made to entities in compliance with the legal obligation set forth in the Real Decreto Legislativo 1/2013, de 29 de noviembre, por el que se aprueba el Texto Refundido de la Ley General de Derechos de las Personas con Discapacidad y de su Inclusión Social (prior known as "LISMI").

In any case, once the donation, sponsorship, membership application, endowment, contribution, and/or dues have been formalized, the Corporate Communications, Marketing and Branding Area shall specify in said Registry, at a minimum and without limitation, the following details: nature of the collaboration (donation, sponsorship, endowments or initial contributions, dues or regular contributions, one-time contributions), beneficiary entity (including Tax ID number), purpose of the collaboration, Indra Group activities covered by it, and amount. Additionally, this registry must be supported by the relevant documentation.

8. ADAPTATION OF EXISTING AGREEMENTS, CONTRACTS, AND INITIATIVES

Agreements, contracts, memoranda of understanding, sponsorships, collaborations, commissions to news agencies or communication service agencies and providers, communication plans, and any other actions falling within the scope of this Policy that are in effect as of the date of its entry into force must be adapted to its principles, criteria, and requirements within a maximum period of three (3) months.

This adaptation will be carried out in accordance with the **“zero-based review” principle**, whereby all existing actions will be subject to a comprehensive reassessment; their existence, duration, recurrence, or history shall not, in and of themselves, constitute sufficient justification for their continuation, renewal, or extension.

Consequently, each initiative must once again demonstrate its alignment with the corporate strategy, its contribution to value creation, its consistency with the brand positioning, the expected return on investment, the adequate management of associated risks, and compliance with the criteria established in this Policy and, where applicable, in its Regulations and Parameters Annex.

During the transition period, the responsible units, in coordination with the Corporate Communications, Marketing and Brand Area, will review current initiatives and propose, as appropriate, their continuation, modification, integration, or termination, while respecting in all cases the contractual obligations previously assumed by the Company.

Once the aforementioned period has elapsed, no initiatives that have not been evaluated and adapted in accordance with the provisions of this Policy and, where applicable, its Regulations and Parameter Annexes, may be maintained, renewed, extended, or approved, unless expressly authorized with justification by the competent body in accordance with the established governance model.

9. ENTRY INTO FORCE

This Corporate Communications, Branding, and Sponsorship Policy was approved by the Board of Directors of Indra Group at its meeting held on 29 September 2026 and entered into force on that date.