

**POLICY ON DONATIONS AND
SPONSORSHIPS**

INDUSTRIA DE DISEÑO TEXTIL, S.A.

(INDITEX, S.A.)

APPROVED BY THE BOARD OF DIRECTORS

ON 19 SEPTEMBER 2017

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1. Purpose

This Policy on Donations and Sponsorships (hereinafter, the “**Policy**”), approved by Inditex’s Board of Directors, implements certain aspects of the Policy on Criminal Risk Prevention, and intertwines with the ethical values of the Inditex Group (hereinafter, “**Inditex**” or the “**Company**”) defined in its Codes of Conduct and Responsible Practices and for Manufacturers and Suppliers. Likewise, this Policy implements the provisions of the Corporate Citizenship Policy and the Corporate Social Responsibility Policy.

This Policy, together with the Policy on Gifts and Business Courtesies, and the Policy on Dealings with Public Servants comprise the so-called Integrity Policies.

This Policy takes into account not only the interests of the Company, but also the requirements and expectations of its employees, customers, shareholders, manufacturers and suppliers, business partners, NGOs, local communities, and those of the society at large, (hereinafter, the “**Stakeholders**”).

Inditex actively fights and condemns any corrupt practices, which, in addition to violating any applicable statutory provisions, where appropriate, would also be contrary to its ethical principles and values, covered in the abovementioned internal regulations.

2. Scope of application

This Policy is mandatory and applies directly and globally to all the companies belonging to Inditex, regardless of the geographical area where they are based. It binds its entire workforce, regardless of their position and the duties they perform.

This Policy is also mandatory for all natural and/or legal persons associated with Inditex, to the extent applicable. Such persons shall express, where appropriate, in writing their commitment to enforce it.

This Policy shall be available on the INET for all the employees, and it will be provided to all Stakeholders upon request. Likewise, notice thereof will be given to all directors, senior executives, and any representative of the Company – where so required considering the type of relation – who shall express in writing their commitment to enforce it.

3. Contents of the Policy

3.1. General Principles

Through this Policy, Inditex seeks to ensure that all its employees, as well as such third parties with which it conducts business, comply with the main anti-bribery regulations applicable in the markets where it is present. For such reason, this Policy endorses the standards set in international standard ISO 37001, on Anti-Bribery Management Systems.

Pursuant to the provisions of Inditex's internal regulations, namely the Compliance Policy and the Compliance Management Procedure, it shall be incumbent on the General Counsel's Office-Code Compliance Office to ensure the appropriate implementation of this Policy. Any violations of this Policy shall be managed pursuant to the terms of section 3.6 below.

3.2. Meaning of donation and sponsorship

For the purposes of this Policy **donation** shall mean any valuable freely given to someone else, who accepts it.

Sponsorship shall mean, for the purposes of this Policy, supporting or funding any activity, usually for advertising purposes, or in consideration for a benefit of similar purpose.

Donations or sponsorships shall always be provided pursuant to the terms of the applicable laws, and they shall never be associated, either directly or indirectly, with any unlawful act, or undue advantage for Inditex.

3.3. Donations to charities or non-profit organizations, and benefits to the community

At Inditex, sustainability, understood as its social and environmental commitment in the conduct of its business in the interest of all its Stakeholders, is part and parcel of its business model.

Inditex's commitment to society is embodied by sponsorship and social action proceedings, including donations to charities and non-profit organizations, as well as other benefits to the community.

Inditex also favours contributions in kind, encouraging its employees to carry out volunteer work to promote the Company's social commitment. At any rate, any donation purported, or which may be construed as purported, to make an impact on tendering procedures, or any other benefit in the interest of Inditex, is forbidden. Likewise, all the entities receiving donations from Inditex shall be subject to a relevant due diligence process for the purposes of ensuring that they are reputed.

Donations made by Inditex shall be recorded in writing.

3.4. Donations to political parties

It is forbidden to make donations to political parties, whether directly or indirectly.

3.5. Sponsorships

All sponsorship proceedings by Inditex shall be recorded in writing. Sponsorship shall be carried out directly dealing with the end entity or event, without any intermediaries.

Inditex gives priority to sponsorship projects requiring continuity over one-off ones, and implements them at corporate level.

3.6. Approval of donations and sponsorships and notice of violations

Inditex's Sponsorship and Patronage Committee shall be responsible for approving and documenting any contribution made to sponsorship, patronage or social investment programs. However, any social action initiative shall be managed by the Sustainability department of the Company, which shall consider it first before submitting it to the Sponsorship and Patronage Committee.

Notice of any violation of the Policy, as well as of any doubt that may arise regarding its enforcement or construction, shall be given to Inditex's Committee of Ethics through its Whistle Blowing Channel by any of the following means:

- By ordinary post addressed to: *Avenida de la Diputación, Edificio Inditex, 15142 Arteixo, A Coruña (Spain)*, for the attention of the Committee of Ethics
- By e-mail addressed to: comitedeetica@inditex.com
- By fax sent to: +34 981 18 62 11

The Committee of Ethics may act of its own motion or at the request of any employee, manufacturer, supplier, or third party with a direct relationship and a lawful business or professional interest, further to a report made in good faith. At any rate, the information conveyed by this channel to the Committee of Ethics is confidential, as is the identity of the whistleblowers who act in good faith. Inditex will not retaliate against them.

3.7. Monitoring of the Policy

The General Counsel's Office - Code Compliance Office shall be charged with ensuring the regular review of the implementation and enforcement of this Policy.

Monitoring of the Policy shall include: (i) its implementation; (ii) the reporting procedures of irregular activities, (iii) the periodic reviews of the effectiveness of training provided to employees on these issues, (iv) the certificates, reports and records of attempted bribery, and, (v) the review of conformity of Inditex's Integrity Policies to prevailing laws in force.

In this respect, the General Counsel's Office - Code Compliance Office shall investigate the allegations or reports received regarding corruption proceedings involving Inditex or which are, somehow, connected with the Company, leaving documentary evidence thereof.

As a result of such investigations, Inditex shall determine the course of action to take, including any eventual disciplinary measure against employees, the termination of trade relations with third parties, and/or the report thereof to the relevant authorities.

The General Counsel's Office - Code Compliance Office shall disclose to the Committee of Ethics the results of such investigations and the implementation and continuous improvement of this Policy.

Regulatory compliance and compliance with ethical standards binds the entire Company and represents one of its strategic goals. Therefore, Inditex's entire workforce shall be familiar with this Policy and respect its contents. Likewise, with regard to third parties with whom Inditex is engaged in any business relationship, they are expected to behave in line with this Policy.

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