

INDITEX



Integrity Policies of the Inditex Group:

Gifts & Invitations Policy

Amended by the Board of Directors on 6 February 2024

About this Policy

Reference	-
Name	Inditex Group's Integrity Policies: Gifts & Invitations Policy
Overview	<p>The Gifts & Invitations Policy together with the Policy on Dealings with Public Officials and the Donations & Sponsorship Policy comprise the "Inditex Group's Integrity Policies".</p> <p>The Integrity Policies showcase the Group's commitment to complying with applicable laws on anti-corruption and anti-bribery in any form or shape.</p> <p>In particular, the Gifts & Invitations Policy cover the practices relating to gifts and invitations, both from anyone at Group to third parties and from third parties to anyone at the Group.</p>
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Scope	Global
Type	Policy
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1. Purpose. Laws and construction.

Purpose

Integrity Policies

The Gifts & Invitations Policy (the “**Policy**”), together with the Policy on Dealings with Public Officials and the Donations & and Sponsorship Policy comprise the “**Inditex Group’s Integrity Policies**”.

The Inditex Group’s Integrity Policies showcase the Group’s commitment to complying with applicable laws on anti-corruption and anti-bribery in any form or shape, in every market where the Group operates, and build on the principles outlined in the Code of Conduct and in other internal rules of conduct.

Gifts & Invitations Policy

This Policy supplements and implements the provisions of the Codes of Conduct, outlining the commitments of the Group in the field of corruption: zero tolerance towards corruption and bribery, and the engagement to actively pursue and condemn any corruption practice, defining the actions to prevent and, if appropriate, detect Gifts & Invitations-related practices that could compromise the Group’s integrity.

The Policy has been drafted considering the interests of the Inditex Group as well as the expectations and requirements of its Stakeholders.

Laws and construction

The enforcement of this Policy should not entail a violation of any applicable laws in the markets where the Group operates.

Where necessary, local internal rules may be approved to ensure that the Policy is aligned with local requirements. In such case, local Policies should adjust as much as possible to the structure and provisions hereunder laid down, only adjusting or supplementing what is strictly necessary to meet statutory and/or local requirements. In the event of any discrepancy between the provisions of the local policy and this Policy, the former shall prevail. Where local policies do not make provisions for a particular matter, this Policy shall apply on the supplementary basis.

2. Definitions

For the purposes of this Policy, the following terms are defined below:

Inditex Group’s Codes of Conduct

The Code of Conduct and the Code of Conduct for Manufacturers and Suppliers.

Inditex Group’s Stakeholders

Anyone at the Inditex Group, its customers, shareholders, manufacturers and suppliers, business partners, NGOs, local communities and the society at large.

Inditex Group

Group made up of Inditex and the companies where Inditex holds, directly or indirectly, at least 50% of the share capital or the voting rights.

Inditex

Industria de Diseño Textil, S.A. (Inditex, S.A.), parent company of the Inditex Group.

Gift (also "Gift and Invitation" or "Invitation")

Gifts include any valuable or invitation extended by anyone at the Group to a third party or received by anyone at the Group from a third party as a token of appreciation within the scope of business and professional relations.

Team Leader

The leader of a group or team within the Group.

3. Scope of application

The Policy applies to every Group company and is binding for anyone at the Inditex Group, irrespective of their job title, position, department or geographic whereabouts.

The Policy also applies to anyone rendering services or collaborating with Inditex on any terms other than an employment relationship, such as board members or directors in any company of the Inditex Group, unpaid interns and anyone engaged or about to be engaged in a professional relationship with the Inditex Group.

4. Overarching principles and engagements

The Policy implements the provisions of the Inditex Group's Code of Conduct and sets out a framework for action built on the following overarching principles and engagements:

/ Abiding by the law and fulfilment of ethical commitments:

- Abiding by the applicable laws in the markets where the Group operates.
- Observing the ethical standards set out in the Inditex Group's Codes of Conduct and the voluntary engagements undertaken by the Inditex Group.

/ Integrity. Zero tolerance towards corruption, bribery or fraud in any form:

- Acting in an objective and professional manner with independence of judgement in the performance of any duties at the Inditex Group, in particular, as regards our dealings with third parties.
- Avoiding any situation that may entail any form of corruption or bribery.
- Avoiding any situation that may entail a conflict of interest in accordance with the Code of Conduct and the Conflicts of Interest Policy.

/ Protection and confidentiality. Ethics Line Warranties:

- Warranties and confidentiality regarding the handling of queries and cases by the Ethics Committee in accordance with the Policy on Internal Reporting Channels and the Ethics Line Procedure.
- No one at Inditex should suffer from retaliation or be threatened with retaliation for declining to give or receive a Gift in violation of the provisions of the Code of Conduct, this Policy or applicable laws, even though doing so might be detrimental to the Company.

5. Anti-corruption action lines

To help anyone at the Inditex Group understand which is their expected behaviour while doing their job, the Policy defines such Gifts and Invitations which are acceptable and sets out the action lines regarding the delivery and reception of Gifts and Invitations.

5.1. Acceptable Gifts

Only the Gifts and Invitations that meet the requirements below shall be accepted or offered by anyone at Inditex:

- / They conform to applicable laws.
- / They do not violate in any way whatsoever the provisions of the Inditex Group's Codes of Conduct.
- / They are offered or received in an open and transparent manner.
- / They are not intended to exert influence over any third parties or obtain from them any undue advantage.
- / They are not intended to obtain or keep a given venture or business advantage.
- / They are not intended to receive or extend a preferential treatment.
- / They would not give rise to any conflict of interest, pursuant to the Conflicts of Interest Policy.
- / Their economic value is not in excess of €100, or the equivalent thereof in local currency (either separately or jointly adding up different gifts offered / received within one year). This capped amount may be adjusted in any given market in view of the existing circumstances and environment. Such adjustment will be carried out pursuant to an internal regulation implementing the Policy.
- / They are not cash, gift cards or any other form allowing any money transfer, which is strictly prohibited.
- / They are not offered to any public official (pursuant to the definition of such term in the Policy on Dealings with Public Officials), except for those presents and courtesies of scarce value which are proportionate and reasonable, according to local practice, occasionally given on the basis of lawful and socially accepted interests. This type of gifts shall be reported as provided in section 5.3 below.

5.2. Forbidden or unacceptable gifts

No Gifts and/or Invitations that violate the provisions of section 5.1 above shall be accepted or offered by anyone at Inditex.

Any Gift or Invitation received in violation of the provisions of section 5.1 above shall be immediately declined or returned. Where gifts and/or invitations cannot be returned, you should refer to your Line Manager, the HR Department or eventually, the Ethics Line, for instructions on how to proceed.

5.3. Practices regarding Gifts and Invitations that need to be reported

The following practices shall be reported by anyone at the Inditex Group, via the General Counsel's Office-Compliance or the Ethics Line:

- / The delivery of or request for Gifts & Invitations to be delivered to public officials; and
- / The receipt from or request for Gifts & Invitations to be received from public officials.

6. Concerns about Gifts or Invitations. Addressing doubts and/or questions

Anyone at Inditex can address their doubts or questions about Gifts and/or Invitations to their Line Manager, the HR Department or the Ethics Line.

The Ethics Line is the preferred confidential channel to receive, investigate and handle through to completion any concerns on topics that fall within the scope of the Policy. As an exception where a local or specific line exists, concerns should be sent via this latter.

The Company will go through every concern or report received within the scope of the Policy.

You can access the Ethics Line on INET or on the company's website (www.inditex.com), as well as via the communication channels that may be set out in the Ethics Line Procedure or, as the case may be, in the procedures of local or specific ethics lines or via any other communication channel set out in the Ethics Line procedure, or, as the case may be, in the procedures for local or specific lines.

In addition, anyone can send a report or concern that falls within the scope of this Policy to their Line Manager or the HR Department.

Ethics Line management. Procedure

The Ethics Line is managed by the Ethics Committee, responsible for handling through to completion the concerns that fall within the scope of this Policy, except where, pursuant to applicable law, a local committee has been appointed to handle them.

Concerns shall be handled in accordance with the Group's internal regulations, in particular, the Global Policy on the Internal Reporting Channels of the Inditex Group and the Ethics Line Procedure, both of which are available on INET and on www.inditex.com.

7. Roles and responsibilities

7.1. Anyone at the Inditex Group

Anyone at Inditex must observe this Policy and its action lines and take the training on Gifts and/or Invitations they are called to attend.

7.2. Board of Directors and Audit and Compliance Committee

The Board of Directors shall be responsible for approving and/or amending the Policy, following a report from the Audit and Compliance Committee.

The Ethics Committee submits reports to the Audit and Compliance Committee on a regular basis.

7.3. Ethics Committee

The duties of the Ethics Committee include, without limitation:

- / Driving and ensuring the implementation of this Policy;
- / Regularly apprising the Audit and Compliance Committee of the enforcement and compliance with the Policy, in particular, of any serious violation thereof.
- / Handling through to completion the cases concerning the violation of the Policy.

7.4. Team leaders

Team leaders will clear up any doubts and answer any question on Gifts and/or Invitations that may be raised, collaborating, where necessary, with the HR Department or the Ethics Committee to clear them.

7.5. Human Resources Department

The HR Department will clear up any doubts and answer any question on Gifts and/or Invitations that may be raised, collaborating, where necessary, with the Ethics Committee to clear them.

7.6. General Counsel's Office – Compliance

The General Counsel's Office – Compliance will be responsible for implementing and managing the Policy.

Its duties include, without limitation:

- / Effectively implementing the Policy taking the relevant measures.
- / Handling concerns on Gifts & Invitations.
- / Planning and managing training and awareness-raising about the Policy.
- / Regularly reviewing the Policy to ensure its alignment with the applicable laws.
- / Assisting the Ethics Committee in the handling of concerns about Gifts and Invitations received via the Ethics Line; in the investigation of allegations or reports of breach of the Policy and to issue the reports from the relevant investigations and to implement the action to be taken including, as the case may be, disciplinary measures against anyone at the Inditex Group, the termination of trade relations with third parties and/or the reporting to the relevant authorities.
- / Monitoring compliance with the Policy.

7.7. Internal Audit

Its duties include, without limitation:

- / Supporting where necessary, together with the General Counsel's Office – Compliance, the Ethics Committee in the investigation of Policy-related allegations or reports.
- / Pursuant to the Internal Audit Charter and its Annual Activities Plan, carrying out audits to establish compliance with the Policy.

8. Violation of the Policy

Violation of this Policy may result in serious consequences for the Group or anyone at the Group, including disciplinary measures under labour laws or the termination of business relations with third parties.

9. Disclosure and circulation

This Policy is available on the Group's intranet (INET) and on the corporate website (www.inditex.com).

The General Counsel's Office - Compliance will liaise with the relevant Departments and local teams at the subsidiaries to implement the appropriate communication and awareness-raising actions to ensure that the Policy is duly understood

and implemented.

10. Oversight and monitoring. Audit

The Inditex Group shall be subject to regular reviews and monitoring, including audits carried out by the Internal Audit Department to assess compliance with the Policy.

11. Update and review

The Policy shall be reviewed and updated, where necessary, at the behest of the General Counsel's Office - Compliance, in order to encompass regulatory changes or best practices as may be required at any time, for the purposes of fulfilling the Group's integrity, anti-corruption and anti-bribery goals.

INDITEX