

# INDITEX



## Sustainability Stakeholder Relations

Policy

Approved on 4 February 2025

## About this Policy

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Reference	-
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Name	Sustainability Stakeholder Relations Policy
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Overview	The Policy seeks to formalize the Group's positioning and governance as regards its system to manage Stakeholders in sustainability-related issues and the potential action-oriented strategies and management and relations model to be considered
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Theme	Sustainability
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Scope	Global
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Type	Policy
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Owner	Inditex Group's Sustainability Department
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Approved on	4 February 2025
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Version	1.0
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Remarks	This Policy has been approved by the Board of Directors following a report from the Sustainability Committee, with the participation of the Social Advisory Board.
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## 1. Purpose. Laws and construction

### Purpose

The Sustainability Stakeholder Relations Policy (the “**Policy**”) seeks to establish the foundations that allow the Group to manage in an orderly and systematic manner relations with Stakeholders with regard to relevant Sustainability themes and topics. Its purpose is to establish a general framework of action that enables Inditex Group to consider the expectations, opinions, inputs and innovations of Stakeholders in the Group’s decision-making process and, consequently, in its business model, own operations, and Value Chain. This approach allows for the integration of practices aligned with the Planetary Boundaries and respect for human rights and the rights of other living beings. In particular, the Policy sets out:

- / The general principles and engagements that shall inspire and guide Stakeholder relations.
- / The core elements of such relations’ management.
- / Governance, to ensure that they are duly understood and followed up, the effective alignment with Inditex Group’s strategy, the achievement of Sustainability goals set by the Group and, to the extent possible, meeting the expectations of the different Stakeholders.
- / The assignment of roles and responsibilities to ensure compliance with the Policy and the enhancement of Stakeholder relations.

### 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 Regulations may be approved to ensure that the Policy is aligned with local requirements. In such case, the local Internal Rule 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 Internal Rule and this Policy, the former shall prevail. Where local Internal Rules do not make provisions for a particular matter, this Policy shall apply on a supplementary basis.

## 2. Definitions

For the purposes hereof, the terms herein defined shall have the following meaning:

### *Supply Chain<sup>i</sup>*

The full range of activities or processes carried out by entities upstream from the Inditex Group which provide it with materials, products or services.

### *Value Chain<sup>ii</sup>*

The full range of activities, resources and relationships related to the Inditex Group’s business model and the external environment in which it operates.

### *Channels for listening, communication, dialogue, and participation (“Channels”):*

Different mechanisms that allow the Inditex Group and its Stakeholders to interact and engage on Sustainability topics. They seek to enable and formalize the exchange of information and knowledge via a fluent communication

between both parties, for the purposes of understanding their opinions, needs, expectations, and suggestions, and to respond to them appropriately. These Channels can be formal or informal, in-person, virtual or hybrid, individual or collective, one-way, two-ways or multi-ways, and may vary depending on the type and objective of the relationship to be established.

### ***Code of Conduct***

Internal rule that covers every ethical commitment undertaken by the Inditex Group and the principles that shall guide the conduct of everyone at Inditex with the Group's stakeholders, including its customers, suppliers, shareholders and the communities where the Group operates.

### ***Codes of Conduct of the Inditex Group***

The Code of Conduct and the Code of Conduct for Manufacturers and Suppliers of the Inditex Group

### ***Sustainability-related Stakeholders (also, "Stakeholders")***

Organisations or individuals (or groups thereof) who, due to their activity, interest, knowledge and/or experience, or their capacity to create an impact, relations and to give an opinion, may influence or be influenced by the Group and its operations -or vice versa-, with regard to relevant Sustainability themes or topics. Stakeholders include, but are not limited to: customers, employees, manufacturers and suppliers, shareholders, public bodies and authorities, academia (understood as public or private promoters of science, knowledge, innovation or its dissemination), as well as the environment itself). Stakeholders will be identified, assessed and classified to guide the Group's actions pursuant to the provisions of the Stakeholder Relations Procedure.

### ***Inditex Group or Group***

Group of companies in which Inditex holds directly or indirectly at least 50% of the share capital or of the voting rights.

### ***Inditex (also, the "Company")***

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

### ***Planetary boundaries<sup>iii</sup>***

Set of 9 planetary boundaries within which humanity can continue to develop and thrive for generations to come. Together they mark a critical threshold for increasing risks to people and the ecosystems we are part of.

### ***Internal Rule ("Internal Regulations")***

Binding rule for the Inditex Group or any company that it comprises, covering the Group's commitments and the expected behaviour from anyone at the Inditex Group. Internal Rules as a whole are known as Internal Regulations.

### ***Sustainability***

Principle allowing to meet the needs of the present without compromising the ability of future generations to meet their own needs.

### ***Themes, topics or trends ("Sustainability themes, topics or trends")***

Contents, aspects, or concepts of any kind related to Sustainability which arise the interest or expectations of

Stakeholders and the Inditex Group itself and in respect of which potential ways of collaboration, cooperation, understanding, influence, exchange of information or knowledge could be created, developed under different forms of contact and/or connection.

### 3. Scope

The Policy is mandatory and binding on every Group company and on everyone at Inditex irrespective of their job title, position, department or geographic whereabouts.

The Policy also applies to anyone rendering services or collaborating with the Inditex Group on any terms other than an employment relationship, such as board members or directors in any company of the Group, interns and anyone engaged or about to be engaged in a professional relationship with the Group, when this is possible due to the nature of the relationship and is convenient for the fulfilment of the purpose of the Policy

### 4. General principles and engagements

Inditex Group's Stakeholder relations is informed by the guidelines for action covered in the Code of Conduct (respect, integrity and honesty, transparency and responsibility) and by permanent dialogue. Under the Policy, the Group will drive consideration for Stakeholders' concerns and expectations upon its decision-making in the field of Sustainability, through active listening, respectful dialogue and the participation and promotion of collaboration spaces, based on any manner of exchanges of knowledge and information.

This principle of collaboration will allow us to focus on issues and opportunities of different scopes, seeking consensus and/or spaces of understanding that, in an ethical, useful, and constructive as well as, diverse, open, and intercultural manner, enable the Group to face global Sustainability challenges, especially those of the fashion industry.

Inditex has considered the position of expert organizations and of national and international standards of reference in the field upon undertaking the following minimum engagements:

- / Identifying on a regular basis the Themes, topics and trends relevant to the Group's strategy as well as the key actors relating thereto (Inditex Group's Stakeholders),
- / Engaging in active listening and dialogue, driving a two-way effective communication between the Inditex Group and its Stakeholders.
- / Making available channels for listening, communication, dialogue, and participation with Stakeholders and ensuring their effectiveness.
- / Acting responsibly and building relations with Stakeholders based on ethics and transparency that seek sustainable development and building shared value.
- / Apprising the relevant governing bodies (Board of Directors or its committees) or the Group's management, where appropriate, of the interests, concerns and expectations of the Stakeholders in the field of Sustainability.

### 5. Stakeholder relations elements

Stakeholder relations model is based on the following core elements:

- / **Identification:** Inditex Group regularly identifies the Themes, topics and trends relevant to the Group and the Stakeholders relating to the same.

- / **Assessment:** following such identification, as set out above, the outcome obtained are assessed and prioritized in a way that allows the Group to appropriately assign efforts, assets and strategies' approach.
- / **Relation models:** the different relations models with the different Stakeholders will be created or established based on objective criteria and the outcome of the assessment above, which takes into account, without limitation, the ability to collaborate with the Inditex Group and the level of mutual commitment. Such models may vary in depth, intensity, and flow of interaction.
- / **Channels:** the Group has in place different mechanisms allowing it to interact with and contact its Stakeholders for the purposes of facilitating an exchange of information and insights based on a fluent communication between both parties.

These elements are developed in the Procedure that implements the Policy.

## 6. Roles and responsibilities

### ***Anyone at Inditex.***

Everyone at Inditex must observe this Policy and take the mandatory training in the field they are called to attend.

### ***Board of Directors and its committees.***

- / The Board of Directors is responsible for approving and/or amending the Group's general policies and strategies, in particular those relating to Sustainability, following a report from the relevant board committee.
- / The Sustainability Committee is responsible for overseeing compliance with the Policy.

### **Social Advisory Board**

The Social Advisory Board, the permanent external advisory and consultative body of the Group in the field of social and environmental Sustainability, may raise proposals and give feedback regarding the identification of key topics and trends and of Stakeholders. The Social Advisory Board will be consulted and apprised of the strategies and plans to be considered. It may also be tasked with formalising and channelling the dialogue with key spokespersons of the civil society where the Group develops its business model.

### ***Sustainability Department***

The Sustainability Department and the Chief Sustainability Officer (CSO) will be ultimately responsible for implementing and managing the Policy. Their duties include:

- / Liaising with the different responsible Departments and teams within Inditex to ensure and oversee compliance with the Policy.
- / Effectively implementing the Policy by taking the appropriate action, including developing a monitoring system, with regular reviews and follow-up, using monitoring mechanisms allowing to assess and monitor the achievement of the aspirations and commitments hereunder set out.
- / Planning and managing training and awareness-raising about the Policy.
- / Establishing and obtaining expert teams and the appropriate resources to globally manage every activity relating to Sustainability Stakeholders.

- / Proposing and/or assigning the appropriate level of Sustainability Stakeholders relations and monitoring.
- / Reporting on the proceedings relating to Sustainability Stakeholders relations to the relevant governing bodies or the Group's management, where appropriate, and on relevant issues raised by the different Stakeholders for such information to be considered in the decision-making process and in the design of the Sustainability strategy.

### ***Compliance Department***

The Compliance Department within the General Counsel's Office will coordinate the reviews and updates of the Policy and any implementing Internal Regulations, at the request of the Sustainability Department.

### ***Other areas with responsibility in the field***

This Policy shall be enforced on every area with responsibilities in managing Sustainability topics and/or Sustainability Stakeholders relations, in the performance of their duties.

## **7. Queries**

Anyone at Inditex can contact the Sustainability Department for advice or to solve any doubts regarding the Policy.

## **8. Violation**

Violation of this Policy may result in several different risks to the Group and, in such cases, corrective or disciplinary measures may be taken in accordance with labour laws. Likewise, the termination of business relations with third parties may also be considered.

## **9. Circulation and training**

The Policy will be available on the Group's intranet (INET) and on the corporate website ([www.inditex.com](http://www.inditex.com)) to every Stakeholder.

Likewise, the Group shall implement the appropriate training and awareness-raising action to ensure that the Policy is understood and implemented.

## **10. Oversight and control. Audit**

The Group will be subject to periodic reviews and controls, including audits developed by the Internal Audit Department, to assess compliance with the Policy.

## **11. Update and review**

This Policy shall be reviewed and updated, where necessary, at the behest of the Sustainability Department, with the collaboration of the Compliance Department, to encompass regulatory changes or best practices as may be required at any time.

Stakeholders' interests and expectations related with this Policy shall also be considered upon carrying out such reviews.



## Appendix

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<sup>i</sup> As defined in Commission Delegated Regulation (EU) 2023/2772.

<sup>ii</sup> As defined in Commission Delegated Regulation (EU) 2023/2772.

<sup>iii</sup> <https://www.stockholmresilience.org/research/planetary-boundaries/the-nine-planetary-boundaries.html>

## INDITEX