OCCUPATIONAL HEALTH & SAFETY POLICY

INDUSTRIA DE DISEÑO TEXTIL, S.A.

(INDITEX, S.A.)

APPROVED BY THE BOARD OF DIRECTORS

ON 10 SEPTEMBER 2019
<table>
<thead>
<tr>
<th>Reference</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Name of the Standard</td>
<td>Occupational Health &amp; Safety Policy</td>
</tr>
<tr>
<td>Scope</td>
<td>Global</td>
</tr>
<tr>
<td>Type</td>
<td>Policy</td>
</tr>
<tr>
<td>Supervisor</td>
<td>Occupational Health and Safety</td>
</tr>
<tr>
<td>Date of approval</td>
<td>10/09/2019</td>
</tr>
<tr>
<td>Version</td>
<td>3.0</td>
</tr>
</tbody>
</table>

1 Date format: DD/MM/YYYY
TABLE OF CONTENTS

1. Purpose 4
2. Scope of application 4
3. Contents 5
  3.1. Commitment: 5
  3.2. Values: 5
  3.3. Approach 5
4. Disclosure of the policy 6
5. Implementation of the policy 6
6. Update and review of the policy 6
7. Grievance mechanisms 6
1. Purpose

The Occupational Health & Safety Policy (the “Policy”) was approved by the Board of Directors on 10 September 2019, following a favourable report of the Audit and Compliance Committee. It represents and expresses the unbreakable commitment of the Inditex Group (“Inditex”, the “Company” or the “Group”) to occupational health and safety of its employees.

Inditex strongly believes that occupational health and safety is at the basis of its ethical culture and its corporate principles and values. For such reason, the Company is committed to continuously improving health, safety and welfare conditions at the work place of all Group employees.

The Company considers that appropriate health and safety conditions are a pre-requisite for the smooth running of its business activities. The Group will not allow any activities that put other interests above health and safety of its employees.

2. Scope of application

This Policy shall apply to the Company and its Group. It shall be binding for the entire staff, regardless of their job and position.

For such purposes, Inditex Group shall mean any company in which Inditex owns, whether directly or indirectly, at least a 50% stake of the share capital or 50% of the voting rights.

The enforcement of this Policy, in full or in part, may extend to any natural and/or legal person associated with Inditex on any terms other than an employment relationship, where this is practicable on account of the nature of the relationship and may be appropriate to meet its purpose.

Under this Policy, Inditex may develop a number of procedures and instructions to implement and enforce the obligations undertaken, and to bring it into line with the different local laws and regulations applicable to the Group.

Inditex expects from all the employees and external suppliers to whom this Policy has been disclosed to undertake to keep and safeguard appropriate health and safety conditions at their work environments.
3. Contents

Inditex’s commitment, values and approach regarding occupational health and safety are addressed below.

3.1. COMMITMENT:

- Inditex is committed to promoting health and safety at the workplace, and acknowledges it to be a cornerstone of its activities. Consequently, it approves the Occupational Health & Safety Policy.
- Inditex believes that constant improvement of occupational health and safety is a common goal that extends to all Group’s levels.
- Inditex is committed to preventing injuries and diseases of its employees, and including consultation and participation of its employees or their representatives in the decision-making process relating to health and safety initiatives.
- Inditex will at any rate comply with: (i) the different local legislations applicable in the markets where it operates; and, (ii) any commitments which it voluntarily subscribes in the field of occupational health and safety.

3.2. VALUES:

- Inditex’s corporate culture is based on teamwork, open communication and high occupational health and safety standards.
- People are Inditex’s most important asset. As such, the Company is committed to offering the best health, safety and welfare conditions to all its employees.
- Inditex strongly believes that health and safety at work enables and increases productivity and guides the way the company operates its business activities. Therefore, the Group will not allow any activities that put other interests above health and safety of its employees and suppliers.
- Inditex acknowledges that training and communication of the Health and Safety program to its employees and their participation in health and safety initiatives are key to achieving the commitments set out in this Policy.
- At Inditex, all employees, officers and stakeholders are part of the commitment to health and safety. The Group expects all of its employees and suppliers to be aware of such commitment, and assume responsibility for maintaining and safeguarding health and safety conditions in their work environments.
- Inditex has set as a permanent objective to reduce work-related accidents and to reduce and minimize health and safety hazards in respect of its employees.

3.3. APPROACH
At Inditex, management of health and safety is based on constant improvement of its conditions.

The Group and its subsidiaries work together in order to ensure that all activities are planned, coordinated and executed in compliance with the Policy, all applicable legislations across the world and voluntary commitments undertaken by the Group.

4. Disclosure of the policy

This Policy will be available to all employees on INET, and shall be made available to all stakeholders of the Company. Likewise, the Policy shall be subject to the appropriate disclosure, training and awareness-raising action, aimed at its full understanding and enforcement.

5. Implementation of the policy

Inditex undertakes to assign specific resources to ensure the effective implementation of the Policy. The Group shall carry out appropriate due diligence processes for the regular identification of current and potential impacts in the field of health and safety, and take the relevant measures to prevent and mitigate any potential negative consequences thereof.

The corporate Health and Safety Department shall be responsible for implementing and monitoring the Policy as a control system, and the Internal Audit Department shall be responsible for overseeing it.

6. Update and review of the policy

The Policy will be reviewed and updated, where applicable, to bring it into line with any changes that the business model may undergo, or that may occur in the context where the Group operates, ensuring at all times the effective implementation thereof.

7. Grievance mechanisms

Inditex maintains a permanent dialogue with its employees or their representatives allowing them to raise their concerns and expectations about health and safety issues which affect the Group.

In addition, Inditex relies on the Health and Safety Department, the Committee of Ethics and the Whistle Blowing Channel to ensure compliance with this Policy and receive and attend to any comments, doubts or complaints regarding its construction, enforcement or compliance.