

# INDITEX



## Human Rights

Policy

Amended by the Board of Directors on February 2024

## About this Policy

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| Reference        | -   |
| Name             | Human Rights Policy   |
| Overview         | This Policy addresses the engagement of the Inditex Group with respecting the internationally recognized Human Rights and outlines the values and principles that guide its business activities in all its spheres of action. |
| Theme            | Sustainability, Human Rights  |
| Scope            | Global  |
| Type             | Policy  |
| Owner            | Sustainability  |
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## 1. Purpose. Laws and construction

### Purpose

The Human Rights Policy (the “**Policy**”), approved in 2016 by the Board of Directors, following a favourable report from the Audit and Compliance Committee and the Social Advisory Board, builds on the Codes of Conduct of the Inditex Group addresses its engagement with respecting the internationally recognized Human Rights and outlines the values and principles that guide its business activities in all its spheres of action.

This Policy considers both the interests of the Inditex Group and the expectations and needs of its Stakeholders.

### Laws and construction

The enforcement of this Policy should not entail a violation of any applicable laws in the market 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 any 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 a 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, suppliers, business partners, non-governmental organizations, local communities and the society at large.

### *Inditex Group or Grupo*

Group made up of Industria de Diseño Textil, S.A. (Inditex, S.A.) and the companies where Inditex holds, directly or indirectly, at least 50% of the share capital or the voting rights.

### *Inditex (also the “Company”)*

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

### *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. Engagements

To meet the Agenda for Sustainable Development set by the United Nations, the Inditex Group has assumed as its own the Sustainable Development Goals (SDGs). Moreover, the Group acknowledges that respect for Human Rights, in the framework of the United Nations Guiding Principles on Business and Human Rights, is key to sustainable development.

In this context, the Inditex Group undertakes to play an active role in the promotion of Human Rights, and to work proactively to respect them. This engagement entails preventing or, if appropriate, reducing the negative consequences of its own proceedings on Human Rights. Likewise, it shall do its utmost to prevent or reduce the negative consequences on Human Rights directly related to the proceedings of third parties with whom the Group is engaged in a business relationship.

This commitment, which is expressed in the Codes of Conduct and in the entire set of internal regulations, is based on a corporate culture firmly rooted on the sustainability of its business model, and it covers all the transactions across the Group's entire value chain.

In particular, this Policy builds upon the ethical values of the Group, outlined in the Code of Conduct and the Code of Conduct for Manufacturers and Suppliers of the Inditex Group. The Policy is also related to the following internal regulations:

- / Sustainability Policy
- / Community Investment Policy
- / Enterprise Risk Management Policy
- / Criminal Risk Prevention Policy
- / Compliance Policy
- / Integrity Policies (Policy on Dealings with Public Officials, Policy on Gifts & Invitations and the Policy on Donations & Sponsorship)
- / Conflicts of Interest Policy
- / Due Diligence Policy
- / D&I Policy
- / Compliance Policy regarding Personal Data Protection and Privacy
- / Health & Safety Policy
- / Anti-harassment Policy

- / Policy on the Internal Reporting Channels
- / The Ethics Line Procedure

## 5. Principles of engagement regarding respect for Human Rights

Under this Policy, the Inditex Group builds on its commitment to respecting and promoting Human Rights as set forth in the United Nations Guiding Principles on Business and Human Rights and fostering them in the communities where it operates.

This Policy is inspired by the following international declarations:

- / The Universal Declaration of Human Rights, that includes:
  - a) The Universal Declaration of Human Rights.
  - b) The International Covenant on Civil and Political Rights.
  - c) The International Covenant on Economic, Social and Cultural Rights.
- / The International Labour Organization (“ILO”) Fundamental Conventions numbers: 29, 87, 98, 100, 105, 111, 138, 155 and 182 as well as the ILO Declaration on Fundamental Principles and Rights at Work.
- / The Ten Principles of the UN Global Compact.
- / The United Nations Guiding Principles on Business and Human Rights.
- / The Guidelines of the Organization for Economic Cooperation and Development (OECD) for Multinational Enterprises.

Additionally, the Inditex Group reinforces its responsibility to sustainability and protection of Human Rights, contributing to the United Nations’ 17 Goals for Sustainable Development, in the framework of the 2030 Agenda for Sustainable Development.

Based upon a review of its business model and the expectations of its stakeholders, the Inditex Group has identified such Human Rights, both non-labour and labour, more directly related to its value chain.

Notwithstanding the foregoing, the Inditex Group represents its commitment towards respecting and promoting all internationally recognized Human Rights.

### *Non-labour Human Rights*

#### *Respect for minorities and communities’ rights*

The Inditex Group undertakes to respect the rights of local communities in such areas where it conducts its business activity, and to respect the local laws, culture and uses, undertaking to maintain an open dialogue with its stakeholders and paying special attention to the more vulnerable groups.

#### *Right to intimacy, data protection and privacy*

The Inditex Group respects the rights of all the persons with whom it interacts, to their intimacy, data protection and privacy, and it shall make an appropriate use of the personal data and information gathered in all the countries where it operates, paying special attention to the data of its employees and customers.

### ***Right to health***

The Inditex Group undertakes to take the required courses of action to ensure that its products do not represent a hazard to the health and safety of its customers.

### ***Right to freedom of opinion, information and expression***

The Inditex Group undertakes to respect and promote, within its scope of application, the right to freedom of opinion, information and expression, respecting diversity of opinion and fostering two-way communication with its stakeholders.

### ***Right to the security of the person***

The Inditex Group undertakes to ensure the security of all the persons with whom it interacts in all its scopes.

Private law enforcements agencies with which it is related shall act in accordance with the applicable laws and regulations and respecting Human Rights.

### ***Contribution to the fight against corruption***

The Inditex Group undertakes to fight corruption in all its forms, both directly and indirectly, including extortion and bribery, pursuant to Principle 10 of UN Global Compact.

The Group relies on a Global Model of Compliance which comprises a criminal risk prevention model, to prevent incurring in any wrongful or unlawful conduct related to corruption in any form or shape.

### ***Right to the environment and to water***

The Inditex Group undertakes to incorporate environmental yardsticks, namely those related to the consequences of climate change and water management, upon planning and implementing its activities and those of its business partners, promoting responsible environmental conducts among its staff, its suppliers and the society at large.

The Group relies on a Sustainability Policy and a global, sound and efficient environmental management standard.

The Inditex Group shall comply with the environmental laws and regulations that apply to its activities, as well as with any other future obligations, and shall make special efforts to prevent pollution and reduce, as much as possible, the potential environmental impact created across its supply chain, both at environmental level and in terms of people. Likewise, the Group shall contribute to preserve the environment, by implementing continuous improvement actions towards reducing direct and indirect greenhouse gas emissions. It shall also strive to reduce resources, control and improve the quality of spills, minimize the use of potentially hazardous components to both the environment and the people, and generally, in the whole system of environmental management of the Group.

In this respect, the Inditex Group acknowledges the relevance of the First Global Legally Binding Climate Agreement signed by 195 countries in December 2015, in the framework of the Paris Climate Change Conference (COP21). The Company also acknowledges the principles covered in the CEO Water Mandate initiative, established by UN Global Compact, as the roadmap for an appropriate and sustainable management of water.

## Labour Human Rights

### ***Forced or compulsory<sup>1</sup> labour is rejected***

The Inditex Group rejects any form of forced or compulsory labour, as defined in ILO Convention 29. This extends both to its own employees and its entire supply chain, as well as to any natural and/or legal person related to the Group.

Inditex joined UN Global Compact in 2001, and adhered to its principle 4, according to which, businesses should uphold the elimination of all forms of forced and compulsory work or work done under coercion.

### ***Child<sup>2</sup> labour is rejected***

The Inditex Group respects children's rights and rejects child labour, pursuant to the provisions of ILO Convention 138 and in accordance with the minimum working age under the relevant regulations of each country. No one under the age of 16 will be hired by the Group, unless not doing so would constitute a violation of the applicable local regulations. Likewise, pursuant to its Code of Conduct for Manufacturers and Suppliers, the Group forbids its suppliers and/or manufacturers to hire anyone under the age of 16.

Moreover, Inditex advocates the children's right to education, in line with the Children's Rights and Business Principles of the United Nations Children's Fund (UNICEF).

### ***Discrimination is rejected and diversity<sup>3</sup> is promoted***

The Inditex Group rejects any form of discrimination, respecting its employees' diversity and offering equal opportunities for employment and professional promotion. No one employed at the Group will be subject to discrimination on grounds of race, ethnicity, disability, illness, religion, marital status, sexual orientation, political opinion, age, citizenship, gender, or on any other grounds whatsoever.

Moreover, manufacturers and suppliers shall refrain from engaging in any discriminatory practice with regards to the recruitment, remuneration, access to training, promotion, termination of employment or retirement of their workers.

### ***Respect for freedom of association and collective bargaining<sup>4</sup>***

The Inditex Group acknowledges the right of its employees to set up, be involved or join trade unions and/or organization that defend and promote their interests, irrespective of the environment where they work. It also ensures its workers respect for collective bargaining, freedom of opinion and protection for the workers' representatives.

In turn, the Code of Conduct for Manufacturers and Suppliers provides that the company's manufacturers and suppliers shall ensure that their employees have, without distinction, the right of association, union membership and to collective bargaining. No retaliation may arise from the exercise of such rights and no remuneration or payment whatsoever may be offered to the employees to hinder the exercise of such rights. Likewise, they shall adopt an open attitude of collaboration towards the activities of trade unions. Workers' representatives shall be protected from any form of discrimination and shall be free to carry out their representative functions at their

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<sup>1</sup> Issues relating to forced labour will be implemented pursuant to ILO Conventions 29 & 105

<sup>2</sup> Issues relating to prohibition of child labour are governed by ILO Conventions 138 & 182

<sup>3</sup> Issues relating to prohibition of discrimination are governed by ILO Convention 111

<sup>4</sup> Issues relating to freedom of association and collective bargaining practices are governed by ILO Conventions 87, 98 & 135



workplace.

### ***Protecting workers<sup>5</sup> health and safety***

Every employee of the Inditex Group works in a healthy and safe pace. The Company ensures that a healthy and safe work environment is provide to its employees through different procedures and regulations in the field of occupational health and safety, meeting all the requirements in this aera laid down in the applicable laws of the countries where it operates.

The Group's manufacturers and suppliers shall also provide their employees with a safe and healthy workplace.

### ***Just, fair and favourable<sup>6</sup> working conditions***

The Inditex Group treats its employees with respect in a just and fair manner and pays their remuneration in accordance with the applicable statutory provisions, including minimum wages, overtime and benefits. The weekly working hours and overtime shall not exceed the statutory limit set forth in the laws and regulations of each country. Overtime shall always be voluntary and paid according to law.

The Inditex Group shall establish all required conditions to ensure that its employees enjoy such rights, pursuant to ILO Conventions or the applicable laws and regulations. Inditex shall strive for its employees to enjoy a work environment free from any form of harassment, intimidation or violation. Thus, any form of harassment or abuse to its employees is prohibited, whether sexual, psychological or verbal, as well as any other behaviour which might lead to an intimidating, offensive or hostile work environment.

The Group's manufacturers and suppliers shall meet the provisions of the Code of Conduct for Manufactures and Suppliers to ensure just, fair and favourable working conditions to all their employees.

## **6. Principles on Human Rights applicable to Stakeholders**

To fulfill the engagements set out above, the following principles shall apply to the relations between the Inditex Group and its Stakeholders:

### ***Employees***

The Inditex Group undertakes to respect all its employees' Human and Labour Rights, in particular those set forth as fundamental, as defined in ILO Conventions. In turn, Inditex demands from all the employees of the Group strict respect for Human Rights and boosts the promotion thereof.

The Inditex Group's engagements to its employees are outlined in the Code of Conduct and implemented in internal regulations and procedures. Additionally, Inditex has a Global Framework Agreement with UNI Global Union to respect and promote fair work and labour rights; such Framework Agreement fosters the implementation of best practices in industrial relations.

### ***Suppliers***

All manufacturers and suppliers that work with Inditex shall undertake to respect their employees' Human and Labour Rights, and to involve their business partners and convey to them such principles.

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<sup>5</sup> Issues relating to working conditions in the occupational safety and health ara are governed by ILO Convention 155

<sup>6</sup> Issues relating to working conditions are governed by ILO Conventions 1, 14, 26, 111 & 131

The Codes of Conduct and in particular, the Code of Conduct for Manufacturers and Suppliers lay down the minimum standards for an ethical and responsible behaviour that must be respected by all its manufacturers and suppliers. These latter are bound to comply with labour laws and regulations of such countries where the Group operates, as well as with ILO Conventions and other international standards, especially underscoring respect for Human Rights in the framework of the United Nations Guiding Principles on Business and Human Rights.

These Codes are implemented by means of internal regulations and a permanent dialogue with the stakeholders, which materialize, among others, in the Global Framework between Inditex and IndustriALL Global Union regarding compliance with international labour regulations across Inditex's production and distribution lines.

### ***Business partners***

The Inditex Group's business partners shall respect and promote the internationally recognized Human Rights in the performance of their activities. In this regard, Inditex shall do its utmost to promote the observance of this obligation. For such purposes, business partners shall be deemed to be any company engaged in business with Inditex by means of any manner of joint venture or franchise.

### ***Customers***

The Inditex Group respects the Human Rights of its customers and undertakes to communicate with them in a clear and transparent manner and to provide safe products and services. Inditex undertakes to offer its customers products that meet high standards for excellence, quality and health & safety, and that are manufactured in an ethical and responsible manner pursuant to the Group's health & safety standards: Clear to Wear, Safe to Wear and IPLUS.

The Group rejects any form of discrimination against its customers, and it will respect at all times their right to privacy, protecting and making an appropriate use of their persona data.

### ***Community***

The Inditex Group promotes and boosts the promotion of Human Rights in any local, national or international community where it operates. As a supplement to the impact of its own business activities, Inditex implements its model of social investments driven by its commitment towards global welfare and the reinforcement of the communities with which it is related. This way of understanding investing in social and environmental programmes entails that Inditex takes part, in a voluntary manner, in practices which build value in the community and in the company, as provided in the Policy on Community Investment.

## **7. Operational-level grievance mechanisms: Ethics Committee and Ethics Line**

The Inditex Group has a permanent dialogue with its stakeholders, allowing these latter to raise their concerns and expectations about respect and promotion of Human Rights by the Group.

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](http://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](http://www.inditex.com).

## **8. Roles and responsibilities**

### **8.1. Anyone at the Inditex Group**

Anyone at Inditex must observe this Policy and take the training they are called to attend.

Anyone at Inditex shall take the required action to ensure that the Policy is implemented, in accordance with their position and responsibilities.

### **8.2. Board of Directors and board Committees**

The Board of Directors is responsible for approving or amending this Policy, following a report from the pertaining board committee.

### **8.3. Ethics Committee**

The duties of the Ethics Committee include, without limitation:

- / Regularly apprising the Audit and Compliance Committee of the enforcement and compliance with this Policy in particular, of any serious breach thereof reported via the Ethics Line.
- / Handling through to completion the cases concerning a breach of this Policy reported via the Ethics Line.

### **8.4. Sustainability Committee**

The duties of the Sustainability Committee include, without limitation:

- / Effectively implementing the Policy by taking the appropriate action.
- / Planning and managing training and awareness-raising regarding the Policy.
- / Training the different areas in the Company and assist them in implementing the Policy.
- / Assisting the Ethics Committee, together with the General Counsel's Office - Compliance, 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.

- / Regularly reviewing the Policy to ensure its alignment with applicable laws.

#### **8.5. General Counsel's Office-Compliance Office**

The General Counsel's Office – Compliance will, together with the Sustainability Department, coordinate the reviews and updates of the Policy.

Likewise, in collaboration with in-house areas or with external assets, the General Counsel's Office – Compliance Office will provide the Ethics Committee with the technical assistance required to handle through to completion any concerns, queries or reports about the Policy.

#### **8.6. Internal Audit**

Pursuant to the Internal Audit Charter and its Annual Activities Plan, Internal Audit may carry out audits to establish compliance with the Policy.

### **9. Oversight and monitoring**

The Inditex Group undertakes to allocate specific assets to ensure the effective implementation of the Human Rights Policy. The Inditex Group shall carry out appropriate due diligence processes, regularly identifying actual and potential impacts in the field of Human Rights and taking the appropriate action to prevent and mitigate any potential negative consequences that may result, promoting positive impacts across its entire value chain.

The Inditex Group will collaborate with its relevant Stakeholders to implement the Policy and will respect and promote the work of those who advocate for Human Rights.

### **10. Disclosure and circulation**

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

The Sustainability Department will liaise with the Communication and Institutional Relations Department, the General Counsel's Office – Compliance 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.

### **11. Update and review**

The Policy will be reviewed and updated on the proposal of the Sustainability Department where this is deemed necessary to encompass any statutory or organisational changes or to embrace best practices.

**INDITEX**