

# INDITEX

A photograph showing a group of diverse employees in an office environment. In the foreground, a woman with blonde hair and a striped shirt is looking towards the camera. Behind her, several other individuals are visible, including men with beards and women with short hair, all smiling and engaged in conversation. The background shows office interiors with desks and plants.

Code of Conduct

# Message from the Chairperson



We are a company with a powerful corporate culture, whereby we each have a strong sense of belonging - this sets us apart and places Inditex in a unique position.

One of the key reasons for this is undoubtedly that each of us at Inditex cares not only about what we do, but also how we do it:

We are passionate about the smallest details, recognising that it is the combination of these details that makes the difference.

We are always striving for improvement.

We are guided by respect, and we continuously listen to all our stakeholders.

We are fully aware of our great responsibility, both towards the teams we are part of and towards society and the planet.

We constantly focus on sustainability, and we integrate it throughout the business.

We act ethically through our commitment to honesty, integrity, and transparency in the decisions we make and the actions we take in our daily work.

This is our way of understanding what we do and our relationship with the world around us. These are the values we share. Values strongly marked by the high standards we set for ourselves. And these shared values unite and guide us in how we do things

These guidelines are outlined in our Code of Conduct, which I have the honour of introducing here. I sincerely believe that these principles are fundamental in explaining how the "magic" of Inditex has enabled us to transform from a small clothing workshop into a global reference in fashion retail.

With all that we have learned so far and our passion for questioning everything, we have once again reflected on these values and the principles that underline them. We have gone on to renew them, expand them, and align them even more to reflect how international, multicultural, and diverse Inditex is today.

The result of this reflection is this Code of Conduct. All of us who are part of Inditex have the obligation to be guided by the principles outlined in this Code in our daily work. It is good news: the continuity and evolution of the code are the only way forward and the best guarantee of the success of this great project that we share in and offer to society.

**Marta Ortega Pérez**

Chairperson, Inditex

# Message from the CEO



The strength of Inditex lies in its people. More specifically, in their way of working and acting, guided by a strong ethical commitment and a deep sense of self-imposed high standards and responsibility. This is the foundation on which millions of people place their trust in our company each day.

This Code of Conduct encompasses the principles that guide how we interact within Inditex and with our stakeholders. It has a practical approach: it provides guidelines for day-to-day work, both in decision-making and in our actions, and it sets out the correct channels to follow should there be any concerns about breaches of this code.

These guidelines govern how we should relate to our people and how we advance our commitment to sustainable development. They also establish how to ensure that we maintain our integrity and protect our assets and information. These are essential matters for Inditex, where ethics and actions are bound. Therefore, this Code of Conduct is mandatory for all of us who are part of this group.

These principles and guidelines lead and define us today. Moreover, they are essential to our endeavour: the “how” in our way of doing things is what makes the difference. Excelling in adhering to the provisions of this Code of Conduct should set us apart as a company in the future. By following this Code, we will give our best and rise to the challenges that await us.

**Óscar García Maceiras**

Chief Executive Officer, Inditex



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# Our code as a benchmark for action

## What is the Code of Conduct?

The Code of Conduct of the Inditex Group (the “**Code**”) is the document that sets out our ethical commitments as a Company as well as the principles of action that guide the way in which we must act as part of the Inditex team and with external stakeholders such as customers, suppliers, shareholders, and the communities in which we operate.

## Why is it important?

The Code is an essential and basic guide that helps us maintain an ethical and responsible behaviour when we make decisions in our professional life in the Group and the development of our daily work. It helps us distinguish what is right and be aware of our obligations, as well as the implications or consequences that may result from our actions.

The Code is based on the principles set out below which must guide the actions we carry out in our professional life:

- / **RESPECT:** for the rest of the workforce and for our customers, suppliers, and business partners, for the communities in which we operate and for the environment.
- / **HONESTY AND INTEGRITY:** in all the decisions, actions, and operations we carry out in our day to day.
- / **TRANSPARENCY:** Fostering open communication and dialogue with our stakeholders.
- / **RESPONSIBILITY:** complying with the laws, this Code, and the rest of our internal regulations, as well as respecting and promoting Human Rights and the commitments voluntarily made by the Company.

## Who does it apply to?

The Code establishes the framework for action of the Inditex Group, including all its subsidiaries and jointly controlled companies (In this Code, referred as “**Inditex**”, the “**Group**” or the “**Company**”). Consequently, compliance with the Code is mandatory for every employee, including Senior Managers, and for the members of the governing bodies of every Group company. The Company will ensure that every staff member who joins any Company of the Group has access to the Code and accepts its terms.

Likewise, all third parties with whom we interact are encouraged to align with our commitments to ethical and responsible conduct. Therefore, if it is necessary and possible, depending on the nature of the relationship, application of the Code may be extended to other stakeholders. Manufacturers of the goods sold by the Group and other suppliers must comply not only with the Code of Conduct for Manufacturers and Suppliers but also with this Code, to the extent applicable to them.

The Code may need to be adapted in some of the markets where the Group operates through complementary or development local annexes. All Code adaptations must be authorised in advance by the Ethics Committee and must respond to one of the reasons listed in the Group’s internal regulations.

## How should we use it? And where is it available?

All of us working at the Inditex Group have an obligation to understand the provisions of the Code and apply them in our day-to-day operations. In addition, we must complete any training on the Code provided by the Company.

Throughout the Code reference is made to various regulations and policies that elaborate and/or supplement the guidelines of action expected of our teams. Our obligation as employees extends to complying with all the rules and procedures of the Company that apply to us based on the nature of our job at Inditex. The Code and the Group's internal regulations are available on the intranet ("INET").

### **Team leaders**

Those entrusted with team management have a fundamental role in the application of the Code and the promotion of the Company's ethical culture. Therefore, they are required to:

- / Lead by example, always respecting the Code and the rest of the Group's internal regulations.
- / Promote the knowledge of and compliance with the Code and other internal regulations of the Group with their teams
- / Encourage the creation of a culture of dialogue and respect in the management of their teams.
- / Contribute to the creation of an environment in which reporting any breach is encouraged and the absence of retaliation is ensured.

## Abiding by the law

Ethical behaviour requires, first and foremost, a firm commitment to compliance with applicable laws and regulations on the markets where we operate.

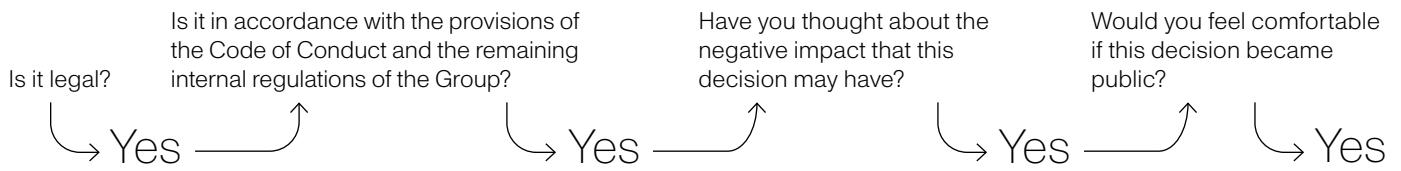
The enforcement of the Code cannot entail the violation of applicable laws<sup>1</sup>. If there are local laws or regulations that establish a higher level of requirement than the Code or the rest of our internal regulations, we must always act in accordance with the law. Conversely, if the Code or internal regulations set a higher level of requirement, the internal regulations must be complied with, unless this compliance contravenes local laws and/or regulations.



<sup>1</sup> The provisions of this Code or the Group's internal regulations are not intended to limit or interfere with the rights of workers recognized by the applicable regulations. Therefore, the obligations contained in the Code will only be binding to the extent that they are compatible with them.

## Making the right decision

Not every decision we have to make while doing our job has a specific answer in the Code. Therefore, the Code seeks to set out basic action lines that we must follow. If we still have doubts about whether we are acting correctly in accordance with the Code, we must ask ourselves the following questions before making any decision:



If we cannot answer yes to all these questions, it is time to stop and raise our doubts. It is important that we know that we have support in decision-making and that we can always seek advice and help.

## How should we report issues or raise questions about the Code?

If you need help, guidance or have any questions, or concerns about the Code or any other internal rules of conduct of the Group, remember that you can communicate them through:

- / Your line manager
- / The Human Resources Department

If you think that the use of these channels may lead to a conflict situation or if you are aware of or suspect a breach of the Code or applicable regulations, you can always report it via the **Ethics Line**. In some sections of the Code, you will find specific contact channels to communicate issues relating to certain topics. If indicated, use these channels as a priority.



## What is the Ethics Line?

It is a confidential communication channel available to you to raise any query or doubt about the Code and the rest of the Group's internal rules of conduct. You can also use it to report, even anonymously, breaches or actions that are contrary to such regulations or to any applicable law.

The Ethics Line is overseen by the Ethics Committee, an internal body that reports to the board of directors via the Audit and Compliance Committee. However, please be aware that, depending on the territory where you are based, there may be additional or supplementary channels to the Ethics Line managed by local bodies similar to the Ethics Committee.

You can access the Ethics Line through the corporate website ([www.inditex.com](http://www.inditex.com)) or through INET.

## Zero-tolerance Policy against retaliation

The Company prohibits any kind of retaliation or threat of retaliation against persons who report any matter in good faith, as well as against persons who cooperate in an investigation. Furthermore, the prohibition of retaliation will be applied in accordance with the provisions of the applicable regulations. If you believe that you have suffered retaliation for these reasons, report it immediately to the Ethics Line.

"Good faith" communication means providing information in an honest, objective, complete, and accurate manner, even if it is later proven to be unsubstantiated or erroneous.

## What are the consequences of violating the Code?

Any action contrary to the provisions established in the Code and the Group's internal regulations may result, in addition to significantly harming the Company, in disciplinary actions that could lead, if appropriate, to the termination of employment, commercial relationship or to another type of action, as the case may be. In any case, such violations will be sanctioned according to applicable labour agreements and laws.

## Review and update of the Code

The Group will periodically review the Code to determine whether it needs to be updated due to legislative changes, modification of internal regulations, identification of new risks, changes in the business or business environment or other circumstances that require it.

Investing in people's  
development



# Good working conditions

Regarding the relations with our people, at Inditex we are committed to:

- / Respecting the minimum age of employment, with the commitment not to hire anyone who does not meet the minimum age to work established by the applicable regulations. No one under the age of 16 will be hired, unless not doing so would constitute a violation of the applicable local regulations.
- / Paying adequate remuneration for the functions performed and time worked, always in compliance with applicable legislation and agreements, and that promotes the development of the teams.
- / Complying with applicable regulations and agreements to the maximum duration of the workday, as well as with the provisions of the International Labour Organization's Convention<sup>2</sup> on working hours. Overtime hours must always be voluntary and compensated in accordance with applicable regulations.
- / Ensuring the right of all workers - regardless of the area where they carry out their activity and always in accordance and where permitted by local regulations - to join, associate and/or create the union of their choice, as well as to, where allowed by applicable law, collective bargaining for the determination of their working conditions, without their status as a member of the union affecting their hiring, their continued employment or their career development at the Group.
- / Respecting the right of trade unions and staff representatives to represent them and to bargain collectively on working conditions affecting them, always in accordance with local regulations, ensuring trade union access to workplaces - without interfering with the workers' appropriate provision of their services- to carry out their representative functions effectively.
- / Rejecting any form of forced or compulsory labour.
- / Promoting measures to help balance family and work life.

## The how matters:

- / Keep in mind and incorporate in your day-to-day decision-making the commitments acquired by the Company to ensure the existence of good working conditions.
- / If you become aware of a breach that affect these commitments, you can report it directly to your line manager, the Human Resources Department, or the Ethics Line or, as the case may be, via any other channel made available by the Company for this purpose.

## Learn more in:

- / Human Rights Policy

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<sup>2</sup> Convention 1 regarding Hours of Work.

# Occupational Health and Safety

At Inditex, we are committed to creating and maintaining safe and healthy working environments that promote the well-being of our teams and other third parties.

We understand health and safety as a prerequisite to attain our corporate goals, and we are committed to complying with applicable regulations in the markets where we operate.

To facilitate the achievement of this goal, Inditex is committed to providing its staff with training and promoting awareness on health and safety.

## The how matters:

- / Know your responsibilities regarding compliance with internal regulations on health and safety and participate in all training actions and/or other initiatives promoted by the Occupational Health and Safety Department.
- / Comply with the health and safety obligations required of you, for your own safety and health, and for that of other people who may be affected by your activities.
- / Ensure the safe use of machines, appliances, tools, substances, transport equipment and, in general, any other means by which you conduct your professional activity.
- / Correctly use personal protective equipment provided to you and any safety devices in place that relate to your job or installed in the workplaces where you do your job.
- / If you become aware of any issue or suspicion of non-compliance regarding health and safety, you can report it to your line manager, the Human Resources Department, the Occupational Health and Safety Department or through the Ethics Line.

## Learn more in:

- / Occupational Health & Safety Policy



# Career development

As a Group, we are convinced that people are key and that it is essential to offer them opportunities for learning and growth so that they continue to be the engine of our progress. This commitment consists of:

- / Promoting development and training opportunities that contribute to the growth of our teams.
- / Encouraging internal talent, prioritising the development of our teams and, as far as possible, internal promotion.
- / Creating high quality, stable, stimulating, and safe work environments.
- / Encouraging open and ongoing communication, as well as working in collaborative environments.

## The how matters:

- / Remember that, in addition to being able to discuss it with the Human Resources' Department, you have all the information about training and development at your disposal in the Talent area on INET.
- / Keep in mind that you must complete all the mandatory training courses assigned to you.



# Diversity, Inclusion, Equal Opportunities and Non-Discrimination

At Inditex we design opportunities for all people, creating diverse and inclusive environments as a key to being a more competitive, creative, and innovative Company. We advocate for a company culture that fosters respect and equality, and that allows each team member to bring their unique perspectives and experiences.

That is why we promote equal opportunities and maintain a zero-tolerance policy towards any form of discrimination, particularly those based on sex, gender identity or expression, sexual orientation, race, ethnicity, religion, age, nationality, civil status, and disability, among other characteristics.

These principles guide and are present in all action areas of our business, particularly in matters related to people management: employees, customers, suppliers, candidates, and workers within our supply chain.

## The how matters:

- / Treat everyone with respect, dignity and in a fair manner while performing your job, irrespective of their role or position within or outside the Company.
- / Promote the creation of professional environments that foster equal opportunities, so that every person has the opportunity to develop and achieve their goals.
- / Play an active part in the collaborative culture and teamwork promoted by Inditex.
- / Keep in mind that we work with diverse teams, made up of people whose sensitivity and needs may differ from yours. Be empathic and communicate openly and respectfully with other people to consider ideas and perspectives different from your own.
- / If you become aware of any situation of discrimination or disregard for the principles of equality, diversity, and inclusion, you can report it to your line manager, the Human Resources Department or the Ethics Line.

## Learn more in:

- / Diversity and Inclusion Policy

# Harassment prevention

We have zero tolerance for any form of violence, harassment and/or abuse, whether physical, sexual, psychological, or verbal. These behaviours are contrary to our values and have no place in the way we work.

## The how matters:

- / Remember that any form of harassment, abuse and violence, as well as any other conduct that could generate intimidating, offensive or hostile situations towards any person or stakeholder with which we relate is prohibited.
- / If you have any doubts about which behaviours may constitute harassment or if you witness, suffer, or become aware of this type of behaviour you can contact your manager, the Human Resources Department, the Ethics Line, or any other similar channel made available by the Company for this purpose.

## Learn more in:

- / Global Anti-Harassment Policy



# Maintaining our integrity



# Anti-corruption and antibribery

Bribery and corruption are completely incompatible with the way we act. At Inditex, we have a zero-tolerance policy towards corruption and bribery in any form, whether directed towards public officials or private individuals, and we are committed to complying with anti-corruption laws in all the markets where we operate.

## The how matters:

- / Be familiar with and comply with the Company's internal regulations on anti-corruption and report via the Ethics Line any activity that may be a breach.
- / Act ethically, and with objectivity, transparency, and independence of judgement in the decisions you make in the performance of your duties and in your relationships with third parties.
- / Never offer, carry out, promise, solicit or accept, directly or indirectly, commissions, favours, benefits, advantages, compensations, or anything else of value, irrespective of their economic value or nature, that may influence your decision-making or that of third parties (whether customers, suppliers, other private persons or public officials) and/or that seek to get undue advantages.
- / Follow the Group's internal third-party registration and due diligence procedures to ensure they are aligned with our commitment to zero tolerance for corruption.
- / Record all payments and expenses, including the settlement of travel expenses, fully and accurately and in accordance with internal procedures.



**In your interactions with public officials:**

- / Ensure that your actions are aligned with applicable laws, are transparent, are lawful and are properly documented and recorded.
- / Remember that, although "facilitation payments" may be a common practice in some markets, they are prohibited by the Company. Facilitation payments are those payments or submission of anything of value, irrespective of their economic value, to public officials as an incentive to complete a routine action more quickly, including, without limitation, obtaining permits or licenses or releasing goods held in customs.
- / Keep in mind that the definition of public official is broad and may vary depending on the market where you are based. Please refer to the Policy on Dealings with Public Officials. In case of doubt, raise your questions via the Ethics Line.
- / If you receive requests for undue payments or threats from public officials to make such payments, please report them via the Ethics Line.

**Donations and sponsorship**

Remember that in accordance with the provisions of the Donations and Sponsorship Policy:

- / Inditex does not make in type of donations to political parties directly or indirectly.
- / All the entities that receive donations from Inditex or collaborate with the Company in community investment initiatives must be previously analysed through a due diligence process.
- / Donations made by Inditex must be documented in writing.
- / The Sponsorship and Patronage Commission is the corporate body responsible for overseeing, approving, and documenting sponsorships, donations, or any other investment initiatives in the community.

**Remember!**

The terms corruption and bribery may have different definitions and/or interpretations depending on the market in which we operate and may affect both public officials and private individuals. You can find more information in the Policy on Dealings with Public Officials.

In any case, keep in mind that an attempted bribe can come in different forms and that a benefit or object of value may include, without limitation: an invitation to an event or dinner, a job offer for someone in your family, the payment of a certain commission or the delivery of a gift. Be prudent and if in doubt: **Ask before acting!**

**Learn more in:**

- / Policy on Dealings with Public Officials
- / Due Diligence Policy
- / Policy on Donations and Sponsorships

# Gifts and invitations

Accepting or offering of gifts or invitations may give rise to situations of conflicts of interest, or their appearance, as well as situations in which the necessary objectivity is put at risk and may influence decision-making in the development of our functions.

As a general rule, at Inditex we do not encourage the acceptance or delivery of gifts or invitations. Therefore, only gifts or invitations that comply with our Policy on Gifts and Invitations and which are lawful, reasonable, occasional and do not seek or are likely to influence the decision-making process can be accepted.

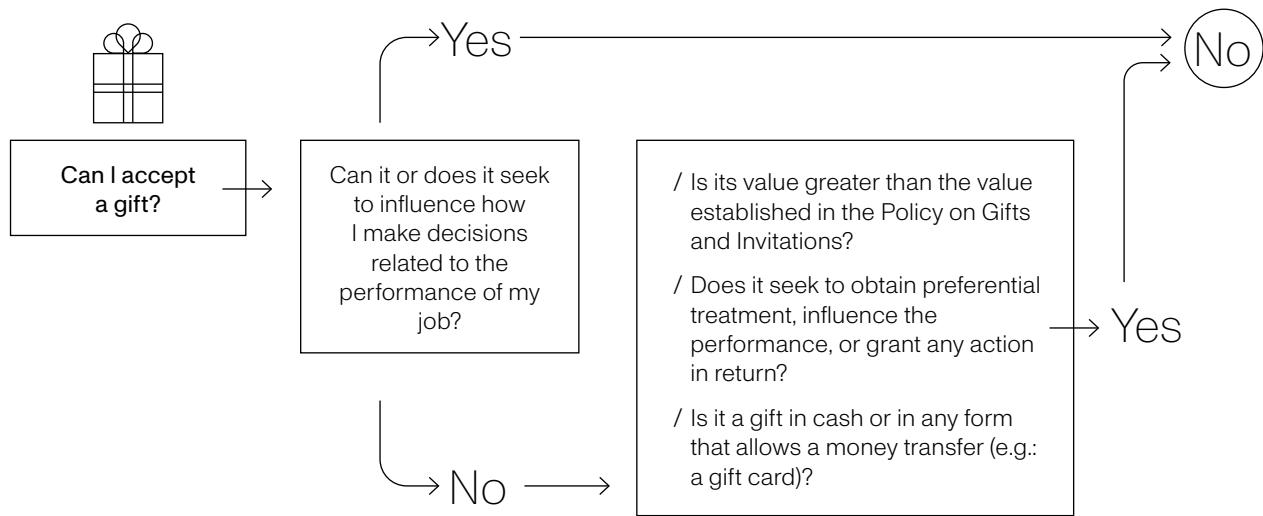
## The how matters:

- / Before accepting or offering any gift or invitation, make sure that they comply with the provisions of the Policy on Gifts and Invitations to the extent applicable. If you have any doubt, ask before acting.
- / Remember that it is expressly forbidden to accept or offer cash gifts, gift cards and gifts in any form that allows the transmission of money, regardless of the amount.
- / Decline or return any gift or invitation received in breach of internal regulations. If you cannot decline or return it, find out how to proceed by consulting your line manager, the Human Resources Department or through the Ethics Line.

### What does reasonable and occasional gifts or invitations mean?

These terms mean that in no case can the economic value of a gift or invitation exceed, either alone or jointly between several gifts or invitations offered/received throughout a year, the amount of 100 euros or its equivalent in local currency, or the value established in the Gifts and Invitations Policy that may be applicable to you.

Remember, however, that the fact that the economic value of the gift or invitation is below the above referred amount does not automatically mean that there is no risk or that you should accept it. Before acting ask yourself the following questions:



**Remember!**

As a general rule, Inditex employees are not allowed to offer, grant, solicit or accept, whether directly or indirectly, gifts or invitations, irrespective of their nature, to or from any authority or public official. If you receive any such request, please contact the General Counsel's Office - Compliance Office or report it via the Ethics Line.

Learn more in:

/ Gifts and Invitations Policy



# Conflicts of interest

At Inditex we respect the personal interests of our staff in their lives outside the Company. However, situations may arise in which such personal interests conflict with the interests of the Company, jeopardising the necessary objectivity in decision-making. This must be reviewed on a case-by-case basis considering existing circumstances. An inappropriate management of conflicts of interest can lead to repercussions for the parties concerned and the Company itself.

## The how matters:

- / Avoid, as far as possible, situations that may involve a conflict between your personal interests or those of your relatives and the interests of the Company.
  - / If personal conflicts of interest or conflicts within your family arise that may compromise your objectivity or professionalism as an employee, report this circumstance in writing and in an honest, transparent and complete manner through your line manager, the Human Resources Department or the Ethics Line.
- Regarding activities that constitute the same or complementary activity as that carried out by Inditex, or which generate an exchange of goods and/or services with Inditex, such as, for example, the supply of goods or the provision of services to any Group company, you should report them via the Ethics Line.
- / In any case, you should refrain from representing the Company or unduly influencing the decision - making on behalf of Inditex regarding decisions in which you have a direct or indirect personal interest.

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### What is a conflict of interest?

A conflict of interest is a situation in which our personal interest conflicts or may conflict with the interest of the Company, compromising our necessary objectivity or professionalism in carrying out our functions within the Group.

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## Exercise of other activities

We respect the possibility that our employees engage in professional activities other than those carried out in Inditex provided that they do not involve a conflict of interest or interfere with the proper development of their professional activity in the Group. So, remember:

- / Any job or business activity outside the Group that affect your working hours at Inditex or impact your expected performance must be previously approved by your line manager and the Human Resources Department.
- / No employee of the Group is allowed to provide services as a consultant, director, officer, employee or advisor at any competing company without the Ethics Committee's authorisation.
- / You may not use your position at the Company to obtain from Inditex or from third parties financial or personal benefits for yourself or for your related persons.
- / Do not use Company assets (including the name of Inditex and your position in the Company), resources, or information for the development of an activity outside your professional activity in the Group.
- / If you participate in political activities, make sure that they do not interfere with your job at the company and that they take place outside your working hours at the Group and outside its facilities, so that they cannot be attributed to the Company.

## Learn more in:

- / Conflicts of interest Policy



# Anti-money laundering and terrorist financing prevention

Inditex is committed to preventing Group companies from being used to disguise the origin of illicitly obtained profits or being involved, whether directly or indirectly, in terrorist financing activities. Therefore, we implement internal controls aimed at preventing this type of behaviour.

Achieving this goal requires that our business partners share this responsibility. For this reason, we are committed to carrying out proportionate and reasonable due diligence actions regarding the companies with which we work.

## The how matters:

- / Be familiar with the internal anti-money laundering and terrorist financing regulations and use the internal controls set by the Company in these fields.
  - / Follow the applicable internal regulations and procedures regarding payment management.
  - / Follow internal due diligence procedures and report to your line manager or through the Ethics Line any suspicious or unusual transactions you may identify.
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### **What is money laundering?**

Money laundering is the illegal process of making the profits generated by a criminal activity appear to have come from a legitimate source.

For further information about the activities that this type of behaviour may cover refer to the Anti-Money Laundering and Terrorist Financing Prevention Policy.

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## Learn more in:

- / Anti-Money Laundering and Terrorist Financing Prevention Policy. / Due Diligence Policy

# Use of Inside information

Inditex is committed to the responsible use of the Group's inside information. This is information relating to any of the Group's companies (which may include, but is not limited to, facts or decisions relating to the financial situation or prospects for development and/or strategy) that has not yet been publicly disclosed and whose publication could affect the price of Inditex's shares or other securities.

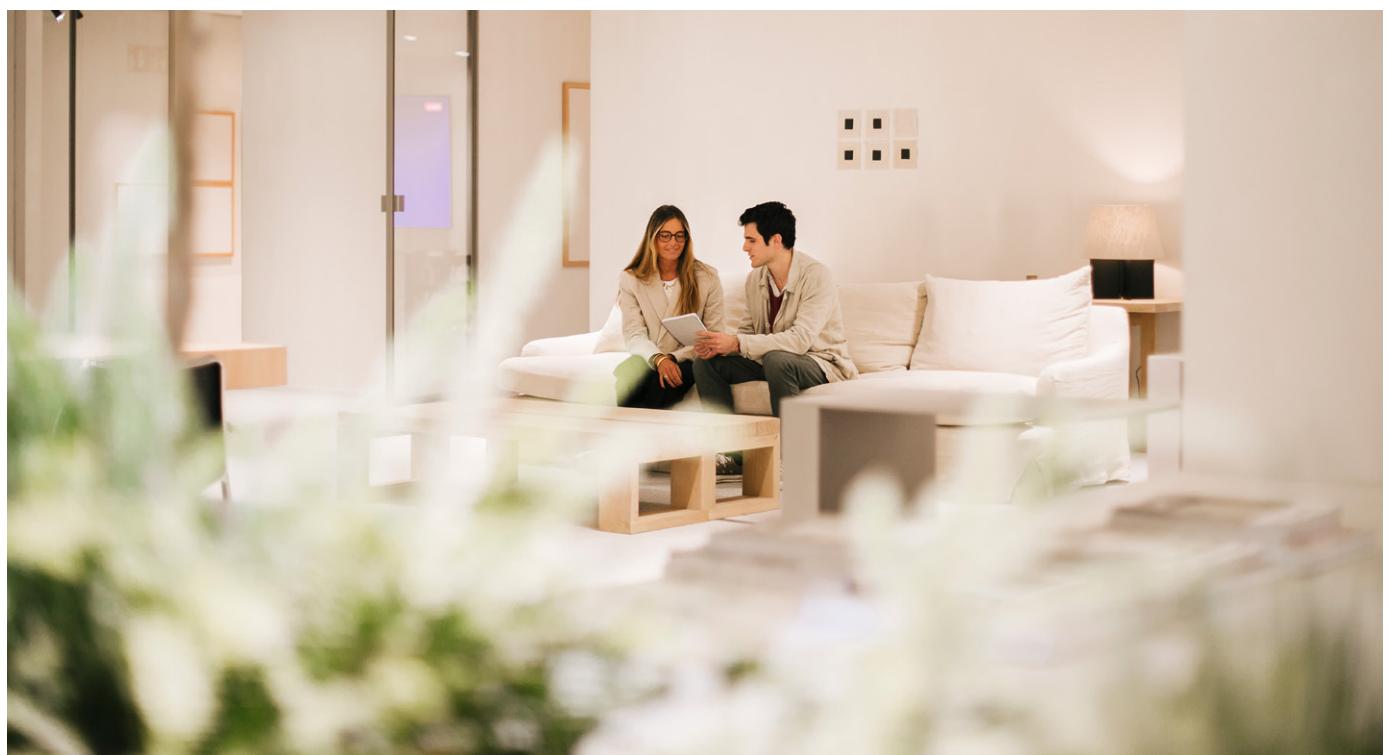
Using this type of information to trade Inditex shares on the market or disclosing it to third parties, whether by accident or design, is illegal. Such conduct may result in significant legal consequences - even criminal ones - both for the person who uses it and the Company itself, in addition to a very high reputational impact for the Company.

## The how matters:

- / Never trade, directly or indirectly, in shares or other financial instruments of Inditex if you have information that could be considered inside information.
- / Do not share any inside information of the Company with third parties including, without limitation, family members or other persons close to you and/or other people working for Inditex who do not need access to such information to do their job at the Company.
- / Do not advise, recommend, or influence the decisions of third parties, including family members and persons close to you, or other people working at Inditex, on the purchase or sale of shares or other financial instruments of Inditex or any other listed company based on the inside information made available to you.

## Learn more in:

- / Internal Regulations of Conduct in the Securities Markets



# Trade

Inditex is committed to ensuring exemplary behaviour in the field of trade, so that the companies of our Group can always be considered as "trusted operators" by the relevant authorities.

All our foreign trade operations must comply with the laws and other applicable regulations, as well as with those obligations voluntarily taken on by the company through the international certifications and standards that we have adopted.

## The how matters:

- / Keep complete and detailed information on each commercial transaction, especially on those elements determining the correct calculation of taxes, as well as those which can be monitored by the authorities of each market: information which could affect the tariff classification, value and origin of our goods, the presence of certain sensitive materials or components in goods, traceability of supply chain, etc.
- / Know in advance the restrictions that affect the acquisition of products, services, or technology, in the markets where we carry out our activity.
- / Obtain all necessary licenses and permits before exporting, re-exporting, or importing such products, services, or technology.
- / Only work with companies and in markets that comply with the requirements established by the Company in terms of embargoes, restrictions, or trade sanctions.



# Antitrust

We are committed to complying with applicable antitrust laws and regulations and refraining from participating in any type of conduct contrary to them.

We implement compliance programs with the aim of making the people of the Inditex Group aware of the risks, both corporate and personal, of violating the antitrust regulations.

## The how matters:

- / Refrain from engaging in antitrust practices, reach agreements or enter into contracts that may be in violation of applicable antitrust and unfair competition regulations.
- / Do not engage in any practice, strategy, or tactic contrary to good faith or that may unjustifiably disrupt the functioning of the market or competition.
- / Follow the guidelines set out in the Antitrust Policy while carrying out your role at the Group.
- / If you have any doubt or identify any breach of antitrust laws and regulations, contact the Legal Department or report it through the Ethics Line.



## Learn more in:

- / Antitrust Policy

# Driving sustainable development



# Our relationship with the environment

We aspire that our activity contributes to the development of a fair society in balance with the limits of the planet. Thus, we are committed to:

- / Respecting Human Rights and protecting, respecting, and improving the environment, making sustainability a part of our business and our value chain.
- / Minimising, to the extent possible, our potential negative impact on the environment by establishing and regularly reviewing objectives and promoting actions aimed at preserving the environment, its restoration, the reduction of greenhouse gas emissions and of the consumption of natural resources and the control of the discharge of potentially hazardous substances.
- / Encouraging the use of raw materials and textile fibres in line with our sustainability commitments, which is key to the responsible design of our garments.
- / Promoting the sustainable development of the communities and environments in which we carry out our activity through, among others, the promotion of voluntary initiatives and projects.
- / Collaborating with groups and institutions with whom Inditex interacts, including suppliers, customers, shareholders and business partners.

In order to fulfil these commitments, we develop the necessary mechanisms so that they are known, internalised and implemented by our staff, informing and training them so that they can identify the potential impacts of their actions and decisions.

## The how matters:

- / Participate in training and awareness actions regarding the initiatives, objectives, and sustainability commitments of the company and incorporate sustainability criteria into your daily decision-making and, to the extent possible, promote awareness among teams, suppliers, customers, and other stakeholders.
- / Make efficient use of the resources you have at your disposal in your workplace, reducing waste generation as much as possible.
- / If you carry out purchasing and design activities, know the characteristics of the raw materials you use and the environmental commitments of the suppliers with which you work, and prioritise the selection of preferred raw materials aligned to our sustainability commitments.

## Learn more in:

- / Sustainability Policy
- / Human Rights Policy
- / Community Investment Policy

# Relations with suppliers and manufacturers

Maintaining ethical relationships based on respect and equal treatment with our suppliers is essential to achieve our objectives. We also have a responsibility to ensure that the third parties with whom we collaborate are aligned with those commitments.

Through a relationship based on dialogue, respect for human and labour rights and the protection of the planet, we promote sustainability throughout our value chain in collaboration with our suppliers. Thus, we are committed to:

- / Establishing and verifying mandatory policies, standards and procedures aimed at the responsible management of the value chain and working towards continuous improvement.
- / Driving and contributing to the improvement of the living conditions of our supplier's and manufacturers workers and the development of the communities in which they live.

## The how matters:

- / Remember that every supplying company of both products and services, is key to our business and we are bound to treat them in an ethical manner.
- / If you become aware that a supplier or manufacturer carries out practices contrary to the regulations that apply to them, such as the Code of Conduct for Manufacturers and Suppliers, the Green to Wear standard or others, report such circumstance via the Ethics Line.
- / Act with objectivity, transparency, and independence of judgement in the selection and decision-making regarding the Group's suppliers, considering at all times the Company's interest and commitments.

## Learn more in:

- / Code of Conduct for Manufacturers and Suppliers
- / Green to Wear Standard
- / Indirect procurement Policy
- / Due Diligence Policy

## Purchasing activity

Objectivity, transparency, and independence of judgement play a significant role in the Group's procurement activities. You must ensure that they are carried out in an ethical manner, in the Company's interest and in accordance with applicable internal procedures and regulations.

Remember that your activities must be justifiable, ascertainable, and verifiable. You must enter clear, complete, accurate and detailed information about your activities in the Company's records.

In addition, you must maintain ethical behaviour based on responsible purchasing practices in the furtherance of your relationships with our suppliers.



# Commitments to our customers

## Product Health and Safety

At Inditex we are committed to making available to our customers products that meet their needs and expectations and that guarantee high standards of health and safety and quality.

In line with this commitment, we ensure the observance of applicable health and safety laws and standards by establishing and implementing our own standards based on international regulations.

### The how matters:

- / Observe and implement our mandatory product health and safety standards, as well as the different procedures established on the labelling, quality, and characteristics of our products.
- / Report any product that is unsafe or of substandard quality to the Sustainability Department (*Product Health and Safety Complaints*).

### Learn more in:

- / Product Health and Safety standards: Clear to Wear, Safe to Wear and IPLUS.

## Marketing and Responsible Communication

We assume the responsibility of maintaining an ethical, objective, transparent relationship, and dialogue with our customers and the rest of our stakeholders, and therefore we should:

- / Provide truthful, clear and complete information about our products and their characteristics, both in their presentation formats and in promotional activities.
- / Ensure that statements, explicit or implicit, made about the social and environmental impacts of our products and our activity are duly justified.
- / Not make any communications about the products of other competitors.
- / Encourage that the goods that we place on the market and the contents published are not offensive, discriminatory, or present an unhealthy image.

### The how matters:

- / Before making communications aimed at customers, make sure they comply with the above commitments.
- / Follow the internal procedures for validating claims, images, tagging and description of attributes.

Protecting our assets  
and information



# Confidential information

The information we generate and use, both our own and that of third parties, is an essential element for the Company, so we have an obligation to use and manage it responsibly.

## The how matters:

- / As a general rule, the non-public information to which you have access to develop your professional activity in the Company is confidential and you must use it only in the performance of this activity. Remember that you may not make inappropriate use of it for your personal benefit or that of third parties.
- / Unless you have been expressly authorised to do so, never share with third parties confidential information about Inditex or about other third parties with whom we work made available to you while doing your job.
- / Always follow internal information security guidelines when using, sharing, classifying, and storing sensitive information, paying particular attention to prevent access to this information by unauthorised persons, both in your usual physical work environment and outside of it.
- / Remember that the confidentiality obligations that apply to you remain in force after termination of the employment, which includes the obligation to refrain from circulating and using and to return every piece of confidential information made available to you while doing your job at Inditex.
- / If you have questions about what kind of uses are authorised in relation to confidential information, please contact the owner of the confidential information.
- / If you detect or suspect a leak or theft of information, improper access or any other related incident, report it to the Information Security Department.

## Learn more in:

- / Information Security Policy
- / Regulations governing use of IT systems
- / Procedure on Information Classification

### **Remember!**

Confidential information may include any financial or commercial information, plans, operations, strategies, processes, sales, prices, personal data and any documentation or non-public information about the business of the Company or third parties, whether it is marked as confidential or not.

# Privacy and personal data protection

At Inditex, we respect and protect the personal data of both our teams and third parties available to us in the performance of our professional activity. Thus, we are committed to treating personal data in accordance with applicable regulations, developing internal policies and procedures and providing the necessary training to bring such obligations closer to all staff members.

We also take responsibility for applying the measures that ensure the confidentiality of personal data, for acting with transparency in the management thereof, and for providing clear information regarding the purpose of their use. Additionally, we commit to establishing controls that demonstrate compliance with applicable regulations and diligent management of any incidents that may affect personal data.

## The how matters:

- / Comply with all the laws, regulations, and standards applicable to personal data processing, and with the applicable internal regulations. If you have any doubts, refer to the Personal Data and Privacy Department.
- / Collect only the personal data required for the purpose for which you need it and use it exclusively for that purpose.
- / Keep the personal data to which you have access in the course of your activity at Inditex confidential.
- / Apply the guidelines, cooperate in the implementation of the measures, and provide the information and documentation requested to prove compliance with the protection of personal data and privacy in your professional life in the Company.
- / Report any breach or incident regarding the protection of personal data to your line manager or to the Data Protection and Privacy Department.

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### What is personal data?

Any information about a natural person allowing to identify them, whether directly or indirectly, including, their name, email, telephone number, personal identification number such as passport or the like, credit or debit cards data, IP address, image, geolocation or biometric data, among others.

Keep in mind that this definition may vary slightly in each market according to local regulations.

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## Learn more in:

- / Compliance Policy regarding Personal Data Protection and Privacy

# Information integrity and transactions record

We are committed to ensuring compliance with our financial, tax, regulatory, and information disclosure obligations. Therefore, the rigorous management of internal information records and their control mechanisms is essential to guarantee compliance with these obligations, as well as to ensure the accuracy, objectivity, and integrity of the information we provide to our stakeholders.

## The how matters:

- / Enter the information and transactions in the Company's records and systems in a transparent, objective, updated, truthful and complete manner, as well as in accordance with applicable regulations and internal processes.
- / Cooperate with internal and/or external audits duly attending to their requests for information.
- / Act in accordance with the Company's guidelines on internal control regarding financial and non-financial reporting

## Learn more in:

- / Policy on Internal Control over Financial Reporting System

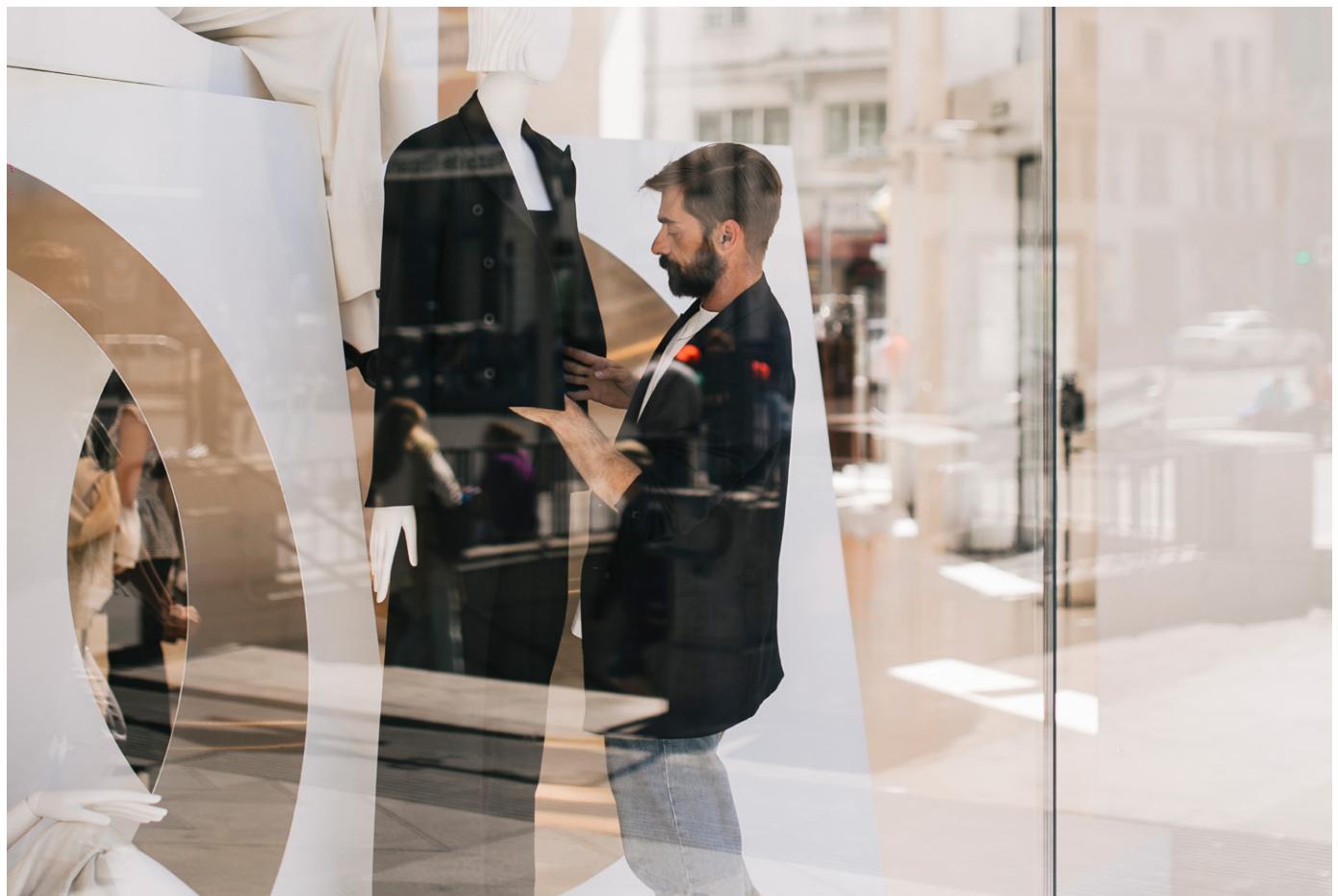


# Intellectual property

The Company is committed to respecting and protecting its own and others' intellectual property, including patents, trademarks, domain names, industrial designs, copyrights and other related rights, database extraction rights, geographical indications and rights over specialised technical knowledge. The Company is also committed to respecting and valuing the cultural creations of all the markets in which we operate.

## The how matters:

- / Do not reproduce the products or creations of third parties and require that our suppliers guarantee the originality of the designs that they make available to the Company.
- / Do not use any material/element belonging to third parties, without the proof that the Company has the necessary rights or authorizations.
- / Do not use the rights of the Company beyond necessary to do your job and such scenarios where their use is expressly authorised.
- / We can only use for marketing and advertising purposes our own trademarks, images, and texts or those that have been duly approved.
- / Remember that the intellectual property resulting from the development of our work in the Company belongs to the Company.



# Public communications

All public communications from the Company must be ethical, legal and duly reflect the positions of the Inditex Group. Therefore, only certain previously authorised persons can act as spokespersons for the Group or any of its brands and create and/or manage the Company's official accounts and profiles on social networks and the internet.

## The how matters:

- / Remember that only duly authorised persons may publicly transmit opinions, information or statements on behalf of the Company.
- / If, as an employee, you receive requests for information from the media or investment companies, institutions or organizations about the Company or its activities, please notify the relevant departments.
- / In all professional activities that you carry out on behalf of the Company, be respectful of the law and people's dignity.

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### USE OF SOCIAL MEDIA

At Inditex we respect the freedom of expression of our people as an essential element for their full personal and professional development and, consequently, the use made of social media as a means to interact with others, share ideas, opinions, tastes or preferences. However, our status as employees of the Group may result in unforeseen and unwanted consequences as a result of our activity on social media. Therefore, when you make use of social media remember:

- / If you identify yourself as a Group employee:
  - / Act according to criteria of respect, dignity and justice, refraining from making comments or carrying out actions that incite or encourage, directly or indirectly, any type of violence, harassment and / or discrimination.
  - / Make it clear that the statements you make are exclusively personal and do not reflect the official position of the Company.
  - / Describe your job in a truthful, clear, complete and appropriate way in line with the functions and responsibilities assigned to you in the Company.
- / Never publish on social media confidential Information related to the Company or third parties, including personal data to which you have had access in Inditex.

Additionally, remember that to help you make responsible decisions about the use of social media, Inditex has established recommendations for their use in the **Guidelines for the Use of social media**.

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## Learn more in:

- / Policy on Official Internet and Social Media Accounts and Profiles

# Use and protection of corporate assets and systems

Inditex provides the tools, goods, devices, systems, and resources necessary for its teams to carry out their work safely, efficiently, lawfully, and responsibly. This involves access to and use of the Company's systems and networks including, email, communication and collaboration tools, databases and files, computer equipment, mobile devices and software applications.

The Company may use tools and software to monitor the use of resources – including email or communication and collaboration tools – and technological devices provided by the Inditex Group, for legally permitted purposes only. The Company ensures that monitoring activities will be carried out in accordance with applicable regulations, following privacy and data protection guidelines, and respecting the principles of prior information, proportionality, justification, necessity, and suitability.

## The how matters:

- / Use of the Company's assets responsibly and ensure that they are not lost, damaged, or wasted
- / Remember that the resources that the Company makes available to you must only be used for lawful purposes related to the professional tasks you carry out in your work and must not be used for personal purposes.
- / Know and respect the legal or similar terms of the products you install or download. Never use, install or download any software, program, application or content whose use is illegal, offensive, or violates the Group's information security and/or personal data protection and privacy policies/procedures.
- / Use the Group's systems and devices in accordance with internal regulations on information security and prevent unauthorised access or incidents. In case of loss or theft of corporate equipment, or if you detect or suspect improper access or an incident related to the Company's systems, notify the Information Security Department.

## Learn more in:

- / Information Security Policy
- / Regulations governing use of IT systems



# Digital ethics

As a Company, we understand the importance of technology in achieving our objectives. That is why, we take responsibility for ensuring that the technological products or services we use, including artificial intelligence environments, are aligned with respect for and compliance with the law and the main ethical recommendations on technology use that exist globally.

This implies, among other things, implementing the principles of equality and non-discrimination, transparency, privacy and security in the design, development, implementation and/or maintenance phases of technological developments, in such a way that they help our teams to make decisions respecting the principles of conduct outlined in this Code.

## The how matters:

- / If you use or are involved in the processes of design, development, implementation or maintenance of technological solutions, services or products, including those AI environments, make sure that you act in accordance with our ethical commitments.
- / Use the artificial intelligence environments certified by the Company in accordance with the permitted use, and avoid any use identified by the Company as high risk.
- / Report according to the Company's internal procedures any breach you may detect regarding the use of technological services or products.

## Learn more in:

- / Information Security Policy
- / Compliance Policy regarding Personal Data Protection and Privacy



**INDITEX**