

ETHICS LINE PROCEDURE

INDUSTRIA DE DISEÑO TEXTIL, S.A.
(INDITEX, S.A.)

APPROVED BY THE BOARD OF DIRECTORS
ON 10 DECEMBER 2019

Reference	
Name of the Standard	Ethics Line Procedure
Scope	Global
Type	Procedure
Supervisor	General Counsel's Office – Office of the Chief Compliance Officer
Date of approval	17/07/2012 (approved) 10/12/2019 (amended)
Version	2.0

TABLE OF CONTENTS

1. Purpose	4
2. Scope of application	4
3. How to report Concerns	5
4. Contents of Concerns	6
5. Guarantees and protective measures	6
5.1. Confidentiality.....	6
5.2. Non-retaliation and presumption of innocence	7
5.3. Right to be heard	7
5.4. Transparency relating to the use of personal data	7
6. Handling and investigation of concerns	7
6.1. Reception and acceptance of Concerns	7
6.2. Launching of proceedings	8
6.3 Internal investigation regarding the Concern	8
6.4 Information and right to hear the parties	8
6.5. Findings and completion of the investigation	9
7. Maintenance, custody and filing information.....	9
8. Disclosure of the Procedure	10
9. Update and Review of the Procedure	10
ANNEX I – INFORMATION ABOUT USE OF PERSONAL DATA OF PARTIES CONCERNED AND REPORTED PARTIES	12
ANNEX II – STANDARD FORM OF CONCERN	15

1. Purpose

This Ethics Line Procedure (the “**Procedure**”), approved by the Board of Directors, following a favourable report of the Audit and Compliance Committee, implements certain aspects of the Code of Conduct and Responsible Practices and the Code of Conduct for Manufacturers and Suppliers (collectively, the “**Codes of Conduct**”) relating to the Regulations of the Committee of Ethics, in accordance with the provisions of internal and external compliance regulations, and intertwines with the ethical values of the Inditex Group (“**Inditex**” or the “**Company**”).

Inditex forms a business organisation which values its international prestige, resulting from the good work of its people, as an important asset.

However, this prestige, garnered over time, may be jeopardized or damaged by an inappropriate or irregular deed by a single employee, officer, director, manufacturer, supplier or third party with whom Inditex is engaged in a direct employment, commercial or professional relationship. To prevent these behaviors, Inditex requires from anyone with whom it may have a direct employment, commercial or professional relationship, that they carry out their business pursuant to the prevailing rules and regulations in force and its internal regulations, namely, the Codes of Conduct and the Policy on Human Rights. Likewise, the collaboration of said persons, whether natural or legal in detecting and preventing irregular or unlawful conducts which may jeopardize Inditex’s reputation or entail a violation of applicable statutory provisions or of the Group’s internal regulations and the Company’s commitment to protecting Human Rights, is essential.

Additionally, further to the successive amendments of *Ley Orgánica* 10/1995, of 23 November, on the Spanish Criminal Code, in 2010 and 2015, according to which legal persons may become criminally liable for such crimes incurred by their employees, officers and directors in the performance of their duties, it is recommended to set a number of measures to prevent, as much as possible, the commission of the above referred offences, including setting up communication and ethics lines. Likewise, pursuant to the most exacting international standards in the field of Compliance and Human Rights, Ethic lines constitute a key element to detect and manage potential risks of non-compliance, and thus support the Company’s commitment to promoting and respecting the corporate ethics culture.

For such purposes, Inditex relies on an Ethics Line, which proceedings are hereunder described. Upon implementing such Ethics Line, Inditex has taken into account the Spanish and European Union regulations on data protection, which are at the basis of the principles and commitments covered in its internal regulations on personal data and privacy.

At any rate, Inditex will respect and comply with any other applicable regulations or provisions, whether of a criminal or employment-related nature, or any other applicable regulations in the markets where it operates.

2. Scope of application

Inditex makes available the Ethics Line to all its employees, manufacturers, suppliers or third parties with whom it has a direct relationship and a lawful business or professional interest (the “**Parties concerned**”), at all levels and in all geographies. The Ethics Line is a confidential channel to:

- i) raise **queries and/or doubts** about the **construction or enforcement** of the **Codes of Conduct** of the Inditex Group, as well as of any other **internal conduct regulations** within the remit of the Committee of Ethics;
- ii) **give notice of any breach** of the **Codes of Conduct** of the Inditex Group as well as of any other **internal conduct regulations** within the remit of the Committee of Ethics they may learn of, affecting Inditex, by employees, manufacturers, suppliers or third parties, with whom Inditex is engaged in a direct employment, commercial or professional relationship (the, “**Reported parties**”).

Queries and notices (jointly referred to as “**Concerns**”) reported through the Ethics Line shall exclusively refer to any behaviour which may reasonably affect the continuance or development of the employment, commercial or professional relationship between Inditex and its employees, suppliers or third parties with whom it has a direct or indirect relationship, as the case may be, never relating to any sphere other than those referred to above, or to the privacy of individuals.

The Parties concerned shall only provide such specific and objective information that is required to determine whether the object of their Concern falls within the scope described. They must also refrain, unless this is essential to understand the scope of the Concern, from providing personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning the sex life or sexual orientation of the Parties concerned, the Reported party or any other natural person.

The Ethics Line is a supplementary tool that does not replace any of the usual communication channels between Inditex and its employees, manufacturers, suppliers and other third parties with whom it has a direct employment, commercial or professional relationship. In this regard, the Parties concerned shall attempt, and Inditex shall encourage, to the extent possible, use of such internal channels prior to resorting to the Ethics Line. Likewise, the Ethics Line shall not detract access by the Parties concerned to any other court or out-of-court grievance mechanisms.

Labour and human resources management issues of the Company fall outside the scope of the Ethics Line. Such issues shall be reported through the ordinary channels of the Company, such as the Human Resources Department.

At any rate, Inditex shall observe and comply with any other applicable regulations or provisions, whether criminal or employment-related, or any other applicable regulations in the markets where it operates. Meanwhile, this Procedure shall be applicable, by extension, in respect of any internal regulations which may have been approved in any of the markets where Inditex operates, for the purposes of encompassing local statutory requirements or best practices in the field of ethics lines.

This Procedure shall be available to all Group employees on the corporate intranet (INET), and on www.inditex.com website to all stakeholders of the Company. Likewise, this Procedure shall be subject to the appropriate circulation, training and awareness-raising proceedings, to ensure its understanding and enforcement.

3. How to report Concerns

The Ethics Line may be contacted through any of the following means:

- **E-mail** sent to: canaletico@inditex.com or ethicsline@inditex.com
- **Ordinary post** addressed to: *Avenida de la Diputación, Edificio Inditex, 15142 Arteixo, A Coruña* (Spain), for the attention of the Committee of Ethics.

Only those individuals specifically appointed by the **Committee of Ethics** for the regular management of the Ethics Line, as part of their internal control and compliance duties, shall have direct access to such addresses and to the contents of the Concerns, exclusively.

The Committee of Ethics is an internal collegial body reporting to the Board of Directors through the Audit and Compliance Committee, charged with overseeing the Ethics Line, and is responsible for promoting the necessary investigations, and proposing, as the case may be, the relevant remediation, prevention and awareness-raising measures. The Committee of Ethics is composed of:

- The General Counsel and Chief Compliance Officer.
- The Chief Audit Officer.
- The Chief Sustainability Officer.
- The Chief Human Resources Officer.

The Committee of Ethics shall act independently, making reasonable efforts to respect the confidentiality of the Concerns received, the Parties concerned and the documentation created, as the case may be.

4. Contents of Concerns

For the purposes of ensuring that investigations are accurate and that Concerns are processed in a confidential manner, they shall include at least, and as the case may be, the following details:

- Identification details of the person who reports the Concerns, such as, name and surname, contact details and, as the case may be, details of the employee (job position or employee number).

Notwithstanding the foregoing, to ensure that the Ethics Line is properly run, and that the privacy of the Parties concerned is protected, Inditex may manage ex-officio such Concerns where the identification of the Parties concerned is not provided, as they are anonymously reported.

- Association of the Party concerned with Inditex and, as the case may be, with the affected company of Inditex or of a third party.
- Identification details of the person or persons to whom the alleged non-compliance is attributed.
- Fact or facts of the breach, specifying as far as possible, the violation of the regulations observed.
- Supporting documentation of the breach, where possible.

5. Guarantees and protective measures

5.1. Confidentiality

Inditex guarantees the absolute confidentiality of the Concerns received through the Ethics Line,

and of the identity of the Party concerned, which will not be revealed to the Reported party or to the rest of the Organisation, without the consent of the Party concerned.

All the individuals who are apprised of the Concern, where this is strictly necessary to handle it, shall be compelled to keep the Concerns strictly confidential, in all their terms, including the data of the parties.

This confidentiality obligation shall not apply where the Committee of Ethics is compelled to reveal and/or make available information and/or documentation relating to its proceedings, including the identity of the parties involved, at the request of a competent court or administrative authority.

5.2. Non-retaliation and presumption of innocence

Acts or retaliation against anyone who reports through the Ethics Line in good faith an actual or suspected breach of Codes of Conduct or the internal conduct regulations of the Group, are strictly forbidden, as are acts of retaliation against anyone who may collaborate with the investigation or help resolve it. Should the Committee of Ethics confirm that any Party concerned acting in good faith has been subject to any punitive measure or retaliation, those responsible for such measures shall be subject to investigation and, as the case may be, to the relevant disciplinary action.

Inditex shall ensure the appropriate protection of privacy, honour and personal data, the presumption of innocence and the right of defence of the Reported parties, especially in case of unfounded, false Concerns, or Concerns reported in bad faith, against which the relevant action shall be taken.

5.3. Right to be heard

Pursuant to the provisions of section 6.4. below, Inditex shall guarantee that in the course of the investigation of the Concern, the Party concerned and the Reported Party shall enjoy the right to be heard, being entitled to defend themselves and to put forward arguments, plead, and submit evidence, as appropriate.

5.4. Transparency relating to the use of personal data

The Company guarantees observance of the principle of transparency relating to the use of personal data in the Ethics Line, through the information provided to the Parties concerned and the Reported parties in *Annex I – Information about use of personal data of Parties concerned and Reported parties*.

6. Handling and investigation of concerns

6.1. Reception and acceptance of Concerns

Concerns reported through the Ethics Line shall be received by the Committee of Ethics who will contact the Party concerned acknowledging receipt, within 7 days of reception thereof.

Upon receipt of the Concern, the Committee of Ethics shall verify first whether it falls under the remit of the Ethics Line; if such was the case, the Committee of Ethics will launch proceedings and refer the matter to the relevant department or area to take the actions described in the paragraphs below. Otherwise, if the Concern falls outside of the Ethics Line's remit, and/or it is not duly grounded, or fails generally to fulfil the requirements of accuracy and clarity, the

Committee will order the immediate closing of proceedings. At any rate, the Committee of Ethics will apprise the Party concerned of the decision made regarding the Concern (whether it has been admitted or closed) as well as the grounds thereof, no later than 3 months of acknowledgment of receipt, or failing such acknowledgement, the Committee of Ethics will have 3 months to inform the Party concerned of its decision upon expiry of seven days of reception of the Concern.

6.2. Launching of proceedings

Where, further to the review of the facts disclosed in the Concern, the Committee of Ethics considers that there are reasonable signs of a breach, as described in section 2 hereof, it will resolve to launch proceedings and the relevant internal investigation, referring the matter to such department(s) or area(s) which will be charged with the investigation, in accordance with the type of affair.

In parallel to the launching of the proceedings and of the investigation by the relevant area or department, the Committee of Ethics may take additional urgent measures to prevent jeopardizing the investigation, or which may be required to protect the Party concerned, with the support of the relevant departments or areas.

6.3 Internal investigation regarding the Concern

Upon conducting the internal investigation, the Committee of Ethics and the relevant department or area, and such third parties specifically appointed to take part or collaborate in the investigation, may gather the information and documentation they deem appropriate from any department, area or company of the Inditex Group, or from third parties, considering in each case the relevance and the nature of the facts reported. Likewise, as many investigations as are deemed necessary in light of each specific case, can be launched, for the purposes of determining the certainty or plausibility of the facts or signs reported. The Committee of Ethics will answer the Concerns reported, meeting at any rate, the applicable specific deadlines of the investigation, under local regulations of each market where the Company operates.

Where the Concern is associated with really serious breaches, or where the circumstances of the case so require, the Committee of Ethics may take the relevant measures to ensure at all times the objectivity of the investigation.

Likewise, should any member of the Committee of Ethics, and/or anyone appointed to collaborate with the investigation be directly or indirectly subject to any Concern, they shall refrain from taking part in the investigation and resolution thereof.

Notwithstanding the foregoing, the Committee of Ethics may entrust an external facilitator with the investigation, in such cases where given the nature, seriousness, complexity or the identity of the parties involved in the facts, this is recommended to properly resolve the Concern.

The Committee of Ethics expressly reserves the right to take the necessary monitoring and control measures on the software tools and equipment that the Company makes available to its employees, including the contents of communications and devices, always in compliance with the applicable laws in the field and guaranteeing the principle of proportionality and dignity of employees.

6.4 Information and right to hear the parties

The natural or legal person(s), whose behaviour is suspected of allegedly being irregular in the Concern, shall be apprised by the Committee of Ethics of such circumstance and of the data processing and its purposes, where this is permitted considering the status of the proceedings, and at any rate, within one (1) month of the date when the Concern was received, provided that the investigation of the facts reported is not hindered, in which case the information may be postponed.

Additionally, through the exercise of the right to hear the parties, the Committee of Ethics shall guarantee the right of the Party concerned and the Reported party to raise in writing arguments, plead and provide evidence, as appropriate.

6.5. Findings and completion of the investigation

Based upon the conclusions drawn further to the internal investigation, the relevant department or area in charge will send a report to the Committee of Ethics.

The Committee of Ethics will consider the terms of such report and prepare a resolution which shall at least address:

- A brief description of the investigation
- The facts proven in the course of the investigation
- The findings, which may consist, as the case may be:
 - In declaring that a breach exists, in which case, the Committee of Ethics may resolve:
 - The immediate cure of such breach and the adoption of the measures to repair the damage caused and to prevent any future breach, if appropriate.
 - Disciplinary measures, ranging from a mere admonishment or warning to dismissal.
 - Referring the resolution to the relevant department which will be charged with taking and at any rate applying the remediation measures which may be necessary. Such remediation measures shall be reported to the Committee of Ethics
 - Closing of proceedings, where further to the internal investigation, the Committee of Ethics finds that no breach whatsoever has occurred.

As a guarantee, Inditex shall only disclose the terms of the resolution and the type of measures taken, if any, to the head of the relevant department or area, to the Parties concerned and the Reported parties, and, where disciplinary measures are required, to the Human Resources department, for the purposes of scheduling and implementing the same.

7. Maintenance, custody and filing information

The Committee of Ethics shall keep an updated registry of all Concerns received and, where appropriate, of the internal investigations carried out and of the measures taken, for the periods permitted by law, under applicable regulations.

Such registry, and the processing made by those involved in handling the Concerns received through the Ethics Line, shall fulfil the appropriate technical and organisational measures to ensure an appropriate level of security of personal data considering the risk and, as the case may

be, those provided in applicable data protection regulations.

With regard to the information that shall be kept recorded, it shall be updated at all times and shall include the following data:

- Date when the Concern was received.
- Means used to send such Concern.
- Details of the Reported party and of the Party concerned.
- A summary description of the type of Concern and of the facts regarding which a breach is observed.
- Dates of information to the Reported party and the Party concerned.
- Documentation used upon investigating the Concern.
- Status of the investigation.

Personal data gathered within the scope of the internal investigation shall be erased when they are no longer necessary and relevant and at any rate, within three (3) months of the date when the Concern is registered, unless the investigation remains in progress.

Personal data regarding any Concern which fall outside the scope of the Ethics Line, are not necessary to conduct the investigation and/or are not subject to any investigation, shall be erased without any delay, except for the transfer thereof to any Public Administration and/or Law Courts, where this is necessary to attend to any potential liability during the relevant forfeiture terms. Such data shall be subsequently physically destroyed.

8. Disclosure of the Procedure

This Procedure will be available on INET to all the employees, and it will be available to all the stakeholders of the Company on the corporate website. Likewise, the Procedure shall be subject to the relevant disclosure, training and awareness-raising proceedings for the appropriate understanding and implementation thereof.

9. Update and Review of the Procedure

This Procedure shall be reviewed and updated, where applicable, for the purposes of encompassing any changes which may arise in the business model or in the context where the Group operates, ensuring at all times the effective implementation thereof.

* * *

ANNEX I – INFORMATION ABOUT USE OF PERSONAL DATA OF PARTIES CONCERNED AND REPORTED PARTIES

1. Joint controllers and contact of the Data Protection Officer

Pursuant to the regulations on data protection, the following shall be deemed to be joint controllers:

- (i) the company within the Inditex Group involved in an employment, business or professional relationship with the Party concerned or the Reported party;
- (ii) Industria de Diseño Textil, S.A. (Inditex, S.A.) being the parent company of the Group (wherein the Committee of Ethics is included). The Committee of Ethics is an internal corporate body that assists the Audit and Compliance Committee with overseeing compliance with the conduct standards and policies set forth in the internal regulations of the Group, for the purposes of handling the internal investigation described in section 6 above.

Parties concerned may contact the Data Protection Officer of the Inditex Group worldwide, at dataprotection@inditex.com.

2. Categories of personal data

The following categories of data can be gathered in the framework of a Concern:

- Identification data, such as name and surname, contact details, and the details of the Reported Party and the party concerned relating to their status as employee, such as position or employee number.
- Relationship with Inditex, Inditex company or other affected third parties.
- Reported breaches.
- Documentation in support of reported breaches.

3. Purposes and legal basis of processing

Data shall be processed for the purposes of detecting, investigating and legally assessing any suspected breach of employment, business or professional obligations, under their respective agreement, including any breach of the Codes of Conduct and the internal conduct policy of the Inditex Group from time to time in force.

Facts or processing reported need to be effectively associated with the employment, business or professional relationship directly linking the Reported party with Inditex.

Likewise, processing of personal data provided in the Concern takes place in the framework of the employment¹, business or professional relationship with the entity of the Inditex Group with which the relevant employment, commercial or professional agreement, has been executed.

¹ Further information about processing of employees' personal data can be found in the Privacy Policy for Employees, available on the corporate intranet (INET) through the tab "Our People" "Data Protection and Privacy" section.

Therefore, the lawful basis for personal data processing shall be, in some cases, the existence of public interest to prevent and act in the event of violation of applicable laws and in others, Inditex's contractual relationship or legitimate interest in pursuing and preventing any proceedings contrary to the above referred internal policies.

4. Data of Reported parties

Likewise, under applicable regulations, the Reported parties shall be apprised of the violation they have been accused of, of the departments and third parties with whom such information can be shared, and of how to exercise their rights regarding their personal data, in accordance with data protection regulations. At any rate, the Reported party's right of access shall be limited to his/her own personal data exclusively, without the exercise of such right extending to the personal data of the Party concerned.

At any rate, the period allowed to inform the Reported party shall not exceed one (1) month from receipt of the Concern, provided that the appropriate investigation of the facts reported is not hindered, or the circumstances of the Concern would not otherwise permit it; in such case, the information can be postponed until disappearance of the risk.

5. Storage period

Personal data gathered through the Ethics Line shall be stored in accordance with the provisions of applicable laws, as described in section 7 above. Namely, data will be stored for as long as it is necessary to decide on whether or not the facts reported should be investigated. Such period may extend for three (3) months at most, from the registration of the Concern. However, should personal data need to be processed for a longer period, in order to continue the investigation, or because a decision has been made to take legal action, data will be stored in a different environment outside the Ethics Line, should this be necessary to complete the investigation or for Inditex to bring the relevant court proceedings.

6. Recipients of personal data

To fulfil the processing purposes above referred, Inditex will give access to personal data (i) to service providers, such as external advisors and collaborators who provide support with the handling or, as the case may be, the investigation of the Concerns received through the Ethics Line, and (ii) potentially, where action needs to be taken as a result of the investigation, the relevant areas/departments/entities of the Inditex Group which will be involved in the investigation and the potential action to be taken regarding the reported behaviour in question.

Likewise, data may also be transferred to judges, law courts, the Office of the Public Prosecutor or competent public administrations, as a result of the investigation which may be launched.

7. International transfers

In this regard, some entities both of the Inditex Group and outside, above referred, may be found outside the European Economic Area and therefore, not be subject to a level of protection equivalent to the one provided in the European Union. In such case, we will

transfer personal data with appropriate guarantees, always ensuring their security:

- Some entities are Privacy Shield certified. (For further information, visit: <https://www.privacyshield.gov/welcome>).
- With other entities, Model Contracts for Transfer of Personal data, approved by the European Commission, have been executed. (For further information, visit: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en).

8. Rights

On the other hand, the Party concerned is apprised of the fact that he/she can exercise the following rights, pursuant to the provisions of the applicable regulations:

- **Right of access:** the Party concerned is entitled to obtain from Inditex confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, to request access to personal data. Access data include, without limitation, the purposes of the processing, the categories of personal data concerned, the recipients or categories of recipient to whom the personal data have been or will be disclosed. They can obtain a copy of the personal data undergoing processing.
- **Right to rectification:** Right to obtain from Inditex the rectification of inaccurate or incomplete personal data concerning him or her.
- **Right to erasure (right to be forgotten):** Right to obtain from Inditex the erasure of personal data concerning him or her.
- **Right to restriction of processing:** Right to obtain from Inditex restriction of processing of his/her personal data; however, Inditex will carry out a review on a case-by-case basis, to determine whether or not the exercise of such right shall apply.
- **Right to object:** where certain circumstances are met, right to object to Inditex's processing of his/her personal data.

Joint controllers have agreed that the Parties concerned and the Reported parties will be entitled to exercise their rights by sending to the Committee of Ethics, a letter to the registered office, or an email to the following email addresses: canaletico@inditex.com or ethicsline@inditex.com, identifying the right they wish to exercise.

They are also entitled to **lodge a complaint** with the competent supervisory authority in each case.

ANNEX II – STANDARD FORM OF CONCERN

ETHIC LINE PROCEDURE – INDITEX GROUP

STANDARD FORM OF CONCERN

[NOTE: all data are mandatory unless otherwise stated herein]

IDENTITY OF THE PARTY CONCERNED		
Name		
Surname		
Email		
Telephone No.		
Association with Inditex (check the appropriate box)	Director	
	Employee <i>(please state your position, department or employee number)</i>	
	Manufacturer	
	Supplier (please state the type of services provided to Inditex)	
	Customer	
	Others	

IDENTITY OF THE REPORTED PARTY		
Name		
Surname		
Email		
Telephone No.		
Company / Organisation		
Association with Inditex <i>(check the appropriate box)</i>	Director	
	Employee <i>(please state your position, department or employee number)</i>	
	Manufacturer	
	Supplier <i>(please state the type of services provided to Inditex)</i>	
	Customer	
	Others	

PURPOSE OF CONCERN	
<i>(please briefly state the purpose of your query or report)</i>	
Query	
Report	

INFORMATION ABOUT THE CONCERN	
<i>NOTE: Unless it is essential to understand the scope of the Concern, you should refrain from providing personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning the sex life or sexual orientation of a natural person</i>	
Objective description of the query or facts regarding which a breach is observed	
Approximate date when facts occurred	
Inditex company(es) affected	
Supporting documentation/ evidence in support of the facts and additional evidence	
Additional remarks	

- I represent that I report this Concern in good faith and that all details reported are true, except for any unintentional mistake or omission.
- I am aware of the processing that personal data herein included may undergo and which is summarised below.

Basic information on data protection	
Joint controllers	Inditex, S.A. (wherein the Committee of Ethics (*) is included) and the company within the Inditex Group involved in an employment, business or professional relationship with the Party concerned or the Reported party.
Purposes and legal basis of processing	We will process the data for the purposes of detecting, investigating and assessing any potential violation of both the agreement, and of the Codes of Conduct and internal conduct policy of the Inditex Group. We are entitled to process the data as we have a public and legitimate interest in doing so.
Recipients	We share data with service providers and collaborators within and outside the European Economic Area, and with the relevant authorities.
Rights	You have the right of access, right to rectification or erasure, and, occasionally, the right to object to processing, as explained in the additional information.
Additional information	For further information please refer to Annex I of the Ethics Line Procedure of the Inditex Group, available on www.inditex.com and on the intranet (INET) of the Inditex Group.

() The Committee of Ethics is comprised of the General Counsel and Chief Compliance Officer, the Chief Audit Officer, the Chief Sustainability Officer, and the Chief Human Resources Officer. Should any of them be the Reported party, he/she will not take part in the investigation as member of the Committee of Ethics.*