

# INDITEX



Policy on

## Public Policy

Approved by the Board of Directors on 10 December 2024

## About this Policy

Reference	-
Name	Policy on Public Policy
Overview	This Policy governs the action lines for the Inditex Group, its staff members and collaborators regarding their Public Policy activities.
Theme	Public Policy
Scope	Global
Type	Policy
Owner	Corporate Development – Public Policy area
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## 1. Purpose. Laws and construction

### Purpose

The Policy on Public Policy (the “**Policy**”) addresses the Inditex Group’s commitment to a transparent and responsible development of the preparation of public policies that affect its business activity, its Stakeholders and the society at large. The Policy builds up on the principles of action covered in the Codes of Conduct and the Integrity Policies of the Group and is aligned with its remaining Internal Regulations.

As a multinational company operating in the textile and fashion industry, the Inditex Group acknowledges that its business activity has an economic, social and environmental impact on the society and that it is liable to contribute to the economic, social and environmental progress of the communities where it operates.

The private sector is a legitimate and necessary actor in the preparation of the different types of public regulations. It represents common interests and adds value in terms of technical experience, the ability to supplement the regulatory activity with industry initiatives and implementation recommendations, and including effective governance systems. The Inditex Group acknowledges its responsibility in participating in the preparation processes of different sets of public regulations that affect its industry, its legitimate interests and its stakeholders, as well as the implementation thereof.

### Laws and construction

The enforcement of this Policy should not entail a violation of any applicable laws in the markets where the Group operates.

Where necessary, local Internal 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 the local policy and this Policy, the former shall prevail provided that it is better aligned with statutory requirements. Where local policies do not make provisions for a particular matter, this Policy shall apply on a supplementary basis.

Inditex may implement aspects of this Policy in other Internal Regulations.

## 2. Definitions

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

### *Public Policy activities (also “Activities”)*

Any form or communication or interaction with Public Authorities, Decision-makers and all relevant actors within the political environment, that seeks to contribute to the design, adoption or implementation of public policies, rules or regulations, or their interpreting guidelines, that affect the legitimate interests of the Inditex Group.

Activities may be:

- / **Direct:** by means of contacts, meetings, calls, letters, emails or other direct channels with the Influential parties.
- / **Indirect:** by participating or supporting business associations, civil society organizations, expert groups, media or other indirect means that may impact the Public Opinion or Influential parties.

### *Codes of Conduct of the Inditex Group (also “Codes of Conduct”)*

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

***Political donation (also “Donations to political parties”)***

Any contribution in cash or in kind made to political parties, candidates, election campaigns or other entities pursuing political objectives.

***Inditex Group (also, the “Group”)***

Group made up of Inditex and the companies where Inditex holds, directly or indirectly, at least 50% of the share capital or the voting rights.

***Stakeholders (also, “Inditex Group’s Stakeholders”)***

Anyone at the Inditex Group, customers, suppliers and other business partners, shareholders, investors and the community at large.

***Inditex (also, the “Company”)***

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

***Internal regulations (also, “Internal rules”)***

Set of regulations binding for the Inditex Group or any company that it comprises.

***Organisation for Economic Co-operation and Development (“OECD”)***

Intergovernmental international organization whose member countries work together to meet the economic, social and environmental challenges resulting from interdependence and globalization.

***United Nations Sustainable Development Goals (also, “SDG” or “Global goals”)***

Goals adopted by the United Nations in 2015 as a universal call to solve poverty, protect the planet and ensure that everyone will live in peace and prosperity by 2030.

***Public Opinion***

Set of attitudes, views, beliefs and values expressed or represented by citizens about a public policy, legislation, regulation or any other public interest affair, via different communication, information and participation channels

***Public Authorities***

Any entity or individual who performs public duties or participates in the preparation process of public policies, rules or regulations, whether at a national, regional, local or international level, including the legislative and the executive powers, public administrations, regulators and international organizations.

***Inditex Group’s Anti-corruption and Integrity Policies (also, the “Integrity Policies”)***

The (i) Policy on Dealings with Public Officials; (ii) Policy on Gifts and invitations, (iii) Anti-money Laundering and Terrorist Financing Policy; (iv) Conflicts of Interest Policy; (v) Due Diligence Policy, and (vi) Policy on Donations and Sponsorship of the Inditex Group. They reflect the Group’s engagement with abiding by applicable laws in the field of anti-corruption and anti-bribery in any form or shape on any market where the Group operates. The Integrity Policies further develop the actions lines set out in the Codes of Conduct and other Internal Rules of the Group.

### *Transparency Register*

A mandatory public register where the information about the Activity carried out by Public Policy Representatives before Action Officers is recorded.

### *Public Policy Representative*

Anyone who, having been previously authorised by the Inditex Group, conveys the Group's stance on a public policy or regulatory issue, whether as an employee, or a supplier or external consultant hired by the Group to that end.

### *Decision-makers*

Special category of Public Authorities and/or public officials who not only take part in the drafting of public policies, but who also have the capacity or authority to approve a public policy, rule or regulation or any other public interest issue.

### *Influential parties*

Any entity or individual with the ability or authority to influence or determine the outcome of a public policy, rule or regulation, or any other public interest affair, including elected representatives, public officials, political advisors, experts and/or the media.

## **3. Scope of application**

The Policy applies to every Group company and is binding on anyone at the Inditex irrespective of their job title, position, department or geographic whereabouts.

The Policy also applies to anyone rendering services or collaborating with the Inditex Group, such as board members or directors in any company of the Inditex Group, interns and anyone engaged or about to be engaged in a professional relationship with the Inditex Group.

The Policy covers any Public Policy Activity seeking to present, discuss or disclose to the Public Authorities, Decision-makers or Influential parties, Inditex Group's stance or interests in any future public policy, legislation or regulation at its debate stage, prior to its approval and entry into force.

## **4. Overarching principles and engagements**

The Inditex Group undertakes to exercise its Public Policy Activities in a responsible, transparent, honest and constructive manner, in full respect of democratic principles, the general interest and diversity of opinion.

The Group is aligned with: (i) the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, and (ii) United Nations SDG.

Moreover, OECD Principles on Public Policies and the Role of Government in Promoting Responsible Business Conduct, currently in development, have been considered while drafting the Policy.

The Policy is informed by the following overarching principles and engagements:

### / **Principle of Responsibility**

The Group undertakes to abide by the law in the markets where it carries out its Activities, respect and promote human and environment rights, and observe the principles of conduct and the ethical standards of its Codes of Conduct and implementing Internal Regulations.

Whenever possible regarding Public Policy Activities, the Inditex Group undertakes to:

- / Align its interests with the general interest and sustainable development, assuming the consequences of its actions and/or omissions.
- / Contribute its experience, knowledge and vision and to seek solutions that contribute to the economic, social and environmental progress of the communities where it operates.

### / **Principles of Integrity and Honesty**

The Group will act in a trustworthy, honest and proportional manner in all its interactions with Public Authorities, Decision-makers, Influential parties, Stakeholders and the Public Opinion, avoiding any form of improper, deceptive or undue influence.

Inditex undertakes to comply with applicable anti-corruption, anti-bribery and influence-peddling laws, and to prevent conflicts of interest in accordance with the Integrity Policies and the remaining Internal Regulations of the Group.

### / **Principle of Transparency**

The Group will be transparent and open regarding its Activities. Information about its most relevant stances and interests will be made available.

### / **Principle of Respect**

Inditex will respect and safeguard the possibility and rights of other Stakeholders to express and uphold their views and interests in the public debate.

## **5. Guidelines regarding Public Policy Activities**

The following guidelines will govern the exercise and conduct of Public Policy Activities:

- / They will be carried out by the Public Policy area, Public Policy Representatives or by anyone expressly appointed to do so, as the case may be, through the authorized channels.
- / Only authorised persons in accordance with the Policy and Procedure for Representatives and Attorneys of companies within the Inditex Group are allowed to represent the Group or any of its companies.
- / Anyone at Inditex shall report to the Public Policy area beforehand any contact with Public Authorities, Decision-makers and/or Influential Parties or the participation in sector-specific or industry work groups, provided that, however such contacts or meetings are or are likely to be related to Public Policy Activities. .
- / In these meetings or contacts, anyone at Inditex shall convey the Group's stance regarding the specific issue they have been delegated and follow the directions of the Public Policy area on how to act pursuant to this Policy. Following such meetings, such individuals shall convey the information gathered in the course of such debates and meetings to the Public Policy area.
- / Those at Inditex who identify any public or regulatory initiative that may affect the interests of the Inditex Group

shall report it to the Public Policy area.

## 6. Prevention, control and transparency measures

To ensure observance of the overarching principles set out above, the Group will implement a set of measures including:

- / **Integrity protection:** The Inditex Group has in place a set of mandatory Integrity Policies that seek to prevent risks related to gifts and invitations, donations, sponsorship and conflicts of interest.
- / **Banning Political Donations:** In accordance with its Code of Conduct and related Internal Regulations, the Group does not engage in any type of donations to political parties, whether direct or indirect.
- / **Engaging individuals having previously held public positions:** Upon engaging individuals having previously held public positions, the provisions of applicable laws in the jurisdictions where the Group operates, the Integrity Policies and the Internal Regulations shall apply.
- / **Internal Public Policy Register:** The Inditex Group shall set up and keep updated an Internal Register of any in-person or remote meetings where Public Policy Activities with Decision makers are carried out. Such Internal Register will be available to the relevant internal and/or external monitoring bodies.
- / **Official transparency registers:** Inditex will register with any mandatory official Transparency Registers in any jurisdiction where it carries out its Activities and will regularly update the information therein recorded.
- / **Registers of official consultations from institutions:** Inditex publishes its most relevant regulatory contributions in official consultation channels made available by the relevant institutions.

## 7. Roles and responsibilities

### / **Anyone at the Inditex Group**

Everyone at Inditex must observe this Policy and take the mandatory training in the field when being called.

### / **Board of Directors and Audit and Compliance Committee**

The Board of Directors is charged with approving and amending the Policy, following a report from the Audit and Compliance Committee.

### / **Public Policy area**

#### Reporting line

Inditex Group's Chief Policy Officer reports to the Corporate Development Department, who reports operationally to the CEO.

#### Responsibilities

The Public Policy area shall be responsible for:



- / Effectively implementing this Policy, in particular the preventive, transparency and monitoring measures herein set out and additional ones that may be deemed appropriate.
- / Detecting relevant issues relating to public or regulatory initiatives, whether future or underway, that may affect the Group's business or operations.
- / Coordinating the preparation of the Group's positioning on such public policies or regulations, whether future or in process.
- / Ensuring that such positioning is aligned with the Group's strategic goals.
- / Developing the Public Policy Activities of the Group and providing the necessary directions to the Public Policy Representatives, as the case may be.
- / Keeping the internal Public Policy Register updated, registering with the mandatory public transparency Registers, and keeping the information therein recorded updated.
- / Reporting on relevant issues relating to public policy or regulatory initiatives, whether future or underway, to every area and department of the Group with responsibilities or interest in the field and liaising with them regarding their participation in preparing Group's positioning.
- / Managing the operations of the Group's Public Policy function.
- / Regularly reporting to the CEO, together with the Corporate Development Department, on the priorities and risks in the field and the effectiveness of the Public Policy function, and to the Board of Directors, the Audit and Compliance Committee or the Management Committee, upon request.

#### **/ Compliance Department**

The duties of the Compliance Department within the General Counsel's Office include, without limitation:

- / Advising on any issues within its purview.
- / Collaborating with the Public Policy area in preparing the Group's positioning on public regulations or policies, whether future or underway.
- / Assisting the Ethics Committee where necessary with the handling and management of the concerns relating to this Policy received via the Ethics Line.
- / Managing the operations of the Group's Global Compliance Model.
- / Identifying and coordinating the evaluation of the Group's compliance risks.
- / Coordinating the application of due diligence processes pursuant to the provisions of the Due Diligence Policy.

#### **/ Legal Department**

The Legal Department shall be responsible for:

- / Advising on any issues within its purview.
- / Collaborating with the Public Policy area in preparing the Group's positioning on public regulations or policies, whether future or underway.
- / Supporting the Public Policy area in the interpretation of laws and regulatory projects.

## **/ Consulting and technical areas in the field**

Based on the issue in question, consulting and expert technical areas in the field shall be tasked, based on the issue in question, with:

- / Advising the Group on any issues within their respective purview, providing their expertise and technical background.
- / Collaborating with the Public Policy area in preparing the Group's positioning on public regulations or policies, whether future or underway.

## **8. Queries. Ethics Line**

### Queries

Anyone at the Inditex Group may contact the Public Policy area to solve any doubts about:

- / The interpretation and enforcement of the Policy and the Transparency Registers used in each jurisdiction.
- / The stances, proceedings and assets of the Public Policy Activities of the Group, as well as about best practices and international standards in the field.
- / The alignment of Activities positions, proceedings and assets with sustainability engagements, respect for human rights and support for SDGs.

### Ethics Line

Anyone at Inditex and Inditex Group's Stakeholders can raise questions and submit concerns relating to this Policy via the Ethics Line.

The Ethics Line is the preferred and confidential channel to receive, investigate and settle concerns relating to any potential breach of the Policy and to implement the appropriate remediation measures, if any. Where a local or specific ethics line exists concerns shall be submitted via such local line.

Inditex will attend every communication or concern received via the Ethics Line within the scope of application of the Policy.

You can access the Ethics Line on the corporate intranet (INET), on the corporate 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 local or specific ethics lines procedures.

### Ethics Line management. Procedure

This Ethics Line is managed by the Ethics Committee, responsible for handling and following through to completion concerns that fall within the scope of application of the Policy, except where pursuant to the applicable local laws, a local body has been appointed to handle them.

Concerns shall be handled in accordance with the internal regulations of the Group, in particular, the Global Policy on Internal Reporting Channels and the Ethics Line Procedure, both of which are available on INET and on [www.inditex.com](http://www.inditex.com).

## **9. Violation of the Policy**

Violation of this Policy may result in a number of different risks to the Group and, consequently, corrective or disciplinary measures can apply in such cases.

## **10. Circulation and training**

The Policy will be available on the corporate website ([www.inditex.com](http://www.inditex.com)) to the Stakeholders and on INET to anyone at the Inditex Group.

The Public Policy area will provide specific training on the Policy to anyone directly or indirectly involved in the Public Policy Activities to ensure that it is known, understood and complied with.

## **11. Oversight and monitoring. Audit**

The Group undertakes to set appropriate management and follow-up systems to ensure that the Policy is effectively complied with, as are the principles that guide it. The Group will be subject to periodic reviews and controls which may, include audits developed by the Internal Audit Department in accordance with the Internal Audit Charter and its annual plan, to assess compliance with the Policy and the effectiveness of its preventive measures.

## **12. Update and review**

This Policy shall be reviewed and updated, where necessary, at the behest of the Public Policy area, with the collaboration of the Compliance and Legal Departments, in order to encompass regulatory changes or best practices as may be required at any time.

## INDITEX