INDITEX

Integrity and Anti-Corruption Policy

Approved on 8 September 2026

About this Policy

Name	Integrity and Anti-Corruption Policy
Overview	This Policy builds on the principles of honesty and integrity enshrined in the Codes of Conduct as well as on the Inditex Group's commitment to a zero-tolerance approach to Corruption and Bribery in any of its operations.
Theme	Ethics and Conduct
Scope	Global
Type	Policy
Owner	Compliance department
Approved by	Board of Directors
Approved on	8 September 2026
Version	1.0
Remarks	Approved by the Board of Directors following a report from the Audit and Compliance Committee with the participation of the Ethics Committee. This new Policy replaces and supersedes the former Gifts & Invitations Policy, the Policy on Dealings with Public Officials, the Policy on Donations and Sponsorhips and the Conflicts of Interest Policy, all four of which have become Procedures that implement it. This Policy reinforces the Inditex Group's Global Compliance Model in terms of Anti-Corruption and Anti-Bribery.
Taxonomy	Anti-corruption and anti-bribery

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1. Purpose. Laws and construction

Purpose

The Integrity and Anti-Corruption Policy (the "Policy") builds on the principle of honesty and integrity enshrined in the Codes of Conduct, and on Inditex Group's commitment to zero-tolerance approach towards Corruption and Bribery in all their forms.

Inditex Group is firmly committed to complying with the applicable anti-corruption laws in the markets where it operates and forbids any form of Corruption and/or Bribery.

Laws and construction

In preparing this Policy, consideration has been given to the legislation applicable in the markets in which the Group operates, international standards and best practices in this area, as well as the needs and expectations of the Inditex Group and its Stakeholders.

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 adapt or supplement the Policy. In such cases, such Internal Rules should adjust as much as possible to the structure and provisions hereunder laid down, adjusting or supplementing only what is strictly necessary to meet statutory and/or local requirements. In the event of any discrepancy between the provisions of the local Internal Rule and this Policy, the former shall prevail. Where local Internal Rules fail to make provisions for a particular matter, this Policy shall apply on a supplementary basis.

This Policy shall be construed in accordance with the Inditex Group's Codes of Conduct and the Internal Regulations implementing its provisions.

2. Definitions

For the purposes of this Policy, the following terms are defined below:

Inditex Group's Codes of Conduct ("Codes of Conduct")

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

Conflict of Interest ("Conflict")

Any actual or potential situation where the personal interest of anyone at Inditex or of any Related Party to them conflicts or may conflict with the interests of the Group, compromising or potentially compromising the necessary objectivity or professionalism of anyone at the Group in the performance of their duties.

Corruption and Bribery ("Corruption")

The act of paying, promising, giving, accepting or requesting an unjustified benefit of any kind, to or from: (i) a Public Official or (ii) an employee/representative of a company, directly or indirectly, as an incentive or reward for acting or refraining from acting in relation to the proper performance of their duties in accordance with applicable laws and regulations and existing standards.

This term also includes the possibility of being subject to extortion by a Public Authority or by a person with the capacity to carry out such an act through the threat of an impact negative to the Group.

The terms "Corruption" and "Bribery" may have different meanings and/or interpretations depending on the market in which the Group operates and may affect relations with both Public Officials and private individuals.

Compliance Function ("Function")

The Compliance Function is a corporate function entrusted with promoting the ethical corporate culture and managing Compliance risks within the scope of the Global Compliance Model. It forms part of the Inditex Group's corporate governance framework, and comprises both (i) the Ethics Committee, as decision-making body, and (ii) the Compliance department, responsible for its management. The Compliance Function acts independently in the performance of its duties and reports to the Board of Directors through the Audit and Compliance Committee.

Public Official ("Public Authority" or "Public Official")

Any public official, government employee, local government official or other official, or similar person, who performs administrative, legislative or judicial functions by appointment, election or succession, as well as any candidate for political office. This also includes persons employed by public companies or organisations, or by companies or organisations directly or indirectly controlled by a Public Authority. A detailed list of functions or positions falling under the category of Public Official is set out in the Procedure on Dealings with Public Officials.

Inditex Group ("Group")

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

Inditex

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

Compliance Function's Transparency Report

Internal Regulations" ("Internal Rules" or "Rules")

Set of regulations binding on the Inditex Group or on some of the companies it comprises.

Facilitation Payments

The provision of anything of value to a Public Official or a person entrusted with equivalent processing or certification functions, to secure or expedite a routine non-discretionary action.

Anyone at the Inditex Group

Any employee of the Group, irrespective of their role or position within the same.

Related Party

With respect to anyone at the Inditex Group, Related Parties shall mean any individual who is:

/ The spouse of anyone at Inditex, or anyone deemed to be equivalent to a spouse.

/ An ascendant, descendant or sibling of anyone at Inditex.

/ An ascendant, descendant or sibling of the employee's spouse or the person deemed to be equivalent to a spouse.

/ A company or other organisation in which any of the foregoing holds a position as director or senior executive, or in which any of the foregoing holds, individually or jointly with the employee and the employee's other Related Parties, a significant interest. For listed companies, this shall mean the interests referred to in the applicable legislation; for unlisted companies, it shall mean any direct or indirect interest exceeding 20% of the company's issued share capital.

Gift or Invitation ("Gift")

Any valuable given by anyone at the Inditex Group to a third party or received by anyone at the Group from a third party as a token of appreciation within the scope of business and professional relations.

Team Leaders

Anyone responsible for managing teams of Inditex Group's employees who plays a key role in implementing the Group's ethical culture.

3. Scope

This Policy is mandatory for all Group companies and anyone at Inditex.

The Policy also applies to anyone rendering services or collaborating with Inditex on any terms other than an employment relationship, such as board members or directors in any company of the Inditex Group, interns and anyone engaged or about to be engaged in a professional relationship with the Inditex Group, where this is possible and convenient to fulfil its mission.

In addition, the Inditex Group shall extend to third parties with whom it has contractual relationships the general principles of the Code of Conduct relating to Integrity and Anti-Corruption, as developed in this Policy.

4. Overarching principles and engagements

The overarching principles and engagements on which the Policy is based are as follows:

/ Abiding by the law and the Internal regulations:

The Group is committed to abiding by the law and observing the Internal Regulations and the ethical commitments willingly undertaken by the Group.

/ Honesty and Integrity. Zero-tolerance approach to Corruption:

The Group rejects Corruption in any form and in all its operations. The Group's commitment to honesty and integrity prevails over obtaining any kind of economic benefit or undue competitive advantage for the Group.

/ Corporate ethical culture:

Anyone at the Group shall act in an ethical, objective and transparent manner, with independent judgement regarding the decisions they make in the performance of their duties and in their relations with third parties. This ethical culture extends to every transaction of the Group and is fostered by means of ongoing training and awareness-raising.

/ Ethics Line and protecting the reporter:

The Group ensures that the concerns received via the Ethics Line are duly handled, ensuring confidentiality, reporter's protection and non-retaliation, in accordance with the guarantees set out in the Global Policy on Internal Reporting Channels and in the Ethics Line Procedure.

/ Independence of the Compliance Function:

The Compliance Function operates independently in the performance of its duties and has the adequate resources required to carry out the activities and responsibilities it has been assigned under this Policy.

/ Transparency and accountability:

The Group is committed to maintaining open and transparent communication with its stakeholders and to reporting on the proceedings and effectiveness of its Compliance Function in the field of Anti-Corruption.

This commitment has materialised, among other things, in the publication of the Compliance Function's Transparency Report, as well as in the periodic reports and updates submitted by such Function to the Group's governing and oversight bodies.

5. Guidance on Anti-Corruption

5.1 Dealings with Public Officials

Dealings of anyone within the Inditex Group with Public Officials shall be guided by the principles of conduct set out in the Codes of Conduct and in this Policy. Specifically: offering, promising, requesting, giving or accepting any Gift, favour or services, irrespective of their value, in exchange for obtaining an undue benefit, shall be prohibited. This prohibition expressly extends to Facilitation Payments.

All dealings between the Group and public authorities shall be conducted in compliance with the laws in force in each market and in accordance with the general principles and guidelines set out in this Policy.

Dealings with Public Officials are further detailed in the Dealings with Public Officials Procedure

5.2 Donations and Sponsorships

The Group's community investment initiatives, donations, sponsorships and philanthropy activities must pursue a legitimate purpose. Specifically, they must not be directly or indirectly connected with unlawful acts or improper benefits for the Inditex Group.

The approval of donations, sponsorships and philanthropy activities shall be the responsibility of the Inditex Group Sponsorship and Philanthropy Committee. The implementation of the resolutions passed by this Committee shall be the responsibility of any of its members, the CEO or any other attorney-in-fact who has been granted specific and sufficient powers for this purpose.

The approval, processing and management of donations, sponsorships and philanthropy transactions and initiatives are governed by the Donations and Sponsorship Procedure.

5.3 Gifts and Invitations

Accepting or offering Gifts and Invitations may give rise to Conflicts of Interest situations, or their appearance, as well as situations in which the necessary objectivity and independent judgement is put at risk, and they may influence decision-making.

As a rule, Inditex Group does not encourage the acceptance or giving of Gifts. Only those Gifts that meet the requirements below can be accepted or offered by anyone at the Group:

- they conform to applicable laws,
- they do not violate in any way whatsoever the provisions of the Codes of Conduct or of the Policy,
- they are offered or received in an open and transparent manner,
- they are not intended to influence the decisions of third parties or to obtain any improper benefit from them,
- they are not intended to obtain or keep a given venture or business advantage,
- they would not give rise to any Conflict of Interest, pursuant to the terms hereunder,
- their economic value is not more than €100, or the equivalent thereof in local currency (either separately or jointly adding up different gifts offered / received within one year). This capped amount may be adjusted in any given market in view of the existing circumstances and environment. Such adjustment will be carried out pursuant to an Internal Regulation intended to adapt the Policy at local level,
- they are not cash, gift cards or any other form allowing any money transfer, which is strictly prohibited,
- they are not offered to or by any Public Official, except for those presents and courtesies of scarce value which are legal, proportionate and reasonable, according to local practice, occasionally given on the basis of lawful and socially accepted interests. Such Gifts shall be disclosed in accordance with this Policy.

Where, for reasons of institutional courtesy or in exceptional circumstances, a prohibited Gift cannot be refused or returned, it must be allocated to community investment purposes in accordance with the criteria and procedure established by the Inditex Group in the applicable Internal Rules.

Conduct guidelines regarding handling of Gifts & Invitations are set out in the Gifts & Invitations Procedure.

5.4 Conflicts of Interest

The Group respects the interests of anyone forming part of the same outside their duties in the Group. However, situations may arise in which such personal interests, or those of their Related Parties, may conflict with the interests of the Inditex Group.

Conflicts of Interest are classified as follows:

- Direct: when anyone at Inditex is involved in the Conflict of Interest.
- Indirect: when a Related Party to anyone at Inditex is involved in the Conflict of Interest.
- Apparent: where the private interests of anyone at Inditex, or a Related Party, do not necessarily conflict with the interests of the Group, but could lead third parties to perceive otherwise.
- Potential: where anyone at Inditex, or a Related Party to them, has an interest that could in the future compromise or interfere with their ability to act impartially in the performance of their duties in the best interests of the Group. Although no actual Conflict of Interest currently exists, the situation could develop into one if not properly managed.
- Actual: where anyone at Inditex has an interest that compromises or may interfere with their ability to act impartially in the performance of their duties in the best interests of the Inditex Group. This Conflict may be current and ongoing or may have occurred in the past.

Actual or potential Conflicts of Interest will arise in the following situations, without limitation:

- Acting on behalf of the Inditex Group or taking part in the deliberations or affecting any decision-making on behalf of the Inditex Group, where themselves or any Related Party to them might have a personal interest,
- availing oneself of one's position at the Inditex Group to obtain from Inditex or from third parties any economic or personal benefit, for themselves or for their Related Parties, in violation of the Codes of Conduct or the remaining applicable Internal Regulations,
- availing oneself of any business opportunity for the Inditex Group, either for oneself or for one's Related Parties.
- using the Inditex Group's name to unduly influence one's private transactions or those of one's Related Parties,
- using the Group's assets, including confidential information, for private purposes,

- / where anyone at the Inditex Group or their Related Parties directly or indirectly engages in activities that are the same as, similar or complementary to those carried out by the Inditex Group,
- / where anyone at the Inditex Group or their Related Parties directly or indirectly engages in activities that give rise to an exchange of goods and/or services with the Inditex Group, irrespective of the remuneration system agreed,
- / where anyone at the Inditex Group renders services to a competitor as director, official, employee, consultant, advisor or collaborator to promote the goods or services of the latter,
- / direct reporting line between anyone at the Inditex Group and a Related Party.

These situations shall be reported via the Team Leader, the Human Resources Department or the Ethics Line, and reviewed on a case-by-case basis considering existing circumstances.

Specifically, pursuant to the terms of the Code of Conduct, anyone at Inditex shall disclose via the Ethics Line, any activities carried out by themselves or their Related Parties which:

- / are of the same or similar nature to those carried out by the Group, or are complementary thereto; or,
- / involve an exchange of goods and/or services with the Group.

Conflicts of Interest situations, the obligations to report them and the process for handling them are governed by the Conflicts of Interest Procedure.

5.5 Travel expenses and entertainment allowance

Travel expenses or entertainment allowance ("Travel Expenses") shall be incurred for strictly work-related reasons, in accordance with the specific circumstances of each situation and, in all cases paid by the Inditex Group.

Anyone at Inditex must at all times adhere to the principles of honesty and integrity, proportionality, transparency and reasonableness set out in the Codes of Conduct, ensuring that Travel Expenses are properly documented and recorded, and are not used to unduly influence third-party decisions or give rise to an actual or potential situation of Corruption.

The Inditex Group shall cover the business travel expenses of group employees incurred in connection with their work, including necessary visits to suppliers and third parties that have, or may have, business dealings with the Group.

The management of Travel Expenses is governed by the applicable Internal Regulations.

5.6 Relations with third parties

Dealings with third parties shall be guided by the principles of conduct laid down in the Codes of Conduct and in this Policy.

No benefit or advantage may ever be received, offered, promised, requested or accepted in exchange for improperly favouring another party in the context of business dealings, including the purchase or sale of goods or the procurement of services.

5.7 Financial and Sustainability Information records

The transparency and accuracy of financial and sustainability information are essential to the Group's strategy. Such information must provide a true and fair view of all transactions carried out in the name and on behalf of the Inditex Group. An appropriate internal control system must be maintained to ensure its reliability.

5.8 Money Laundering and Terrorist Financing Prevention

The Inditex Group takes the necessary measures to prevent Group companies and their business partners from being used to conceal the origin of illicit proceeds or from becoming directly or indirectly involved in terrorist financing activities. To this end, it has implemented appropriate internal controls and reasonable and proportionate due diligence measures designed to prevent this type of behaviour.

Anti-money Laundering and Terrorist Financing Prevention are governed by the provisions of the Anti-money Laundering and Terrorist Financing Prevention Policy and the Due Diligence Policy.

5.9 Due Diligence

The Inditex Group has in place a third-party due diligence system intended to identify, assess, prevent and mitigate Compliance risks associated with anti-corruption.

Such due diligence systems is governed by the provisions of the Due Diligence Policy.

6. Global Compliance Model and anti-corruption

The Inditex Group has in place a risk-based Global Compliance Model (the "Model") aimed at identifying, assessing, preventing, detecting and handling Compliance risks associated with its business and operations, in particular, risks associated with Anti-Corruption.

This Model covers mechanisms and internal controls designed to ensure compliance with the law, this Policy and the Internal Regulations implementing it, as well as to prevent, manage and respond to potential breaches.

The Model is governed by the Compliance Policy and the Internal Rules that implement it.

7. Roles and Responsibilities

7.1 Anyone at the Inditex Group

Compliance with this Policy and the applicable Internal Regulations is mandatory to anyone at the Group. They shall also attend the mandatory training in this field they may be called to attend.

7.2 Board of Directors

The duties of Inditex's Board of Directors in the field of integrity and anti-corruption include:

- defining and promoting the Group's ethical culture and its ethical commitments, as well as its zero-tolerance approach towards any form of Corruption,
- overseeing risk management, including management of Compliance risks associated with anti-corruption,
- overseeing, with the support of the Audit and Compliance Committee, that the Global Compliance Model is adequate, including every anti-corruption related aspect,
- approving or amending this Policy, following a report from the Audit and Compliance Committee.

7.3 Audit and Compliance Committee

The duties of the Audit and Compliance Committee in the field include, without limitation:

- assisting the Board of Directors in overseeing Compliance matters,
- overseeing that Compliance risks management and the management of the Global Compliance Model are adequate, including every Anti-Corruption related aspect,
- overseeing the proceedings of the Ethics Line, as a reporting mechanism associated with this Policy, including Conflicts of Interest,
- overseeing the Compliance Function, ensuring that it is independent and focused on the principal Compliance risks of the Group, including Corruption; approving both the

allocation of assets adequate for the effective discharge of its duties, ensuring its independence, and the Annual Work Plan of the Compliance Function and overseeing its implementation,

- overseeing the Internal Audit Function, ensuring that it is independent and focused on the Group's principal risks, including Anti-Corruption risks, and that the necessary assets for the effective discharge of its duties re available; being apprised of the results and significant exposures identified, ensuring that the Executive Management properly addresses the conclusions and recommendations made,
- receiving from the Ethics Committee the reports on compliance with Internal Regulations on integrity and Anti-Corruption,
- drawing conclusions and issuing recommendations in this field.

7.4 Ethics Committee

The duties of the Ethics Committee in the field of Integrity and Anti-Corruption include, without limitation:

- overseeing the implementation and compliance with the Policy and its implementing Internal Regulations,
- overseeing the effective circulation of this Policy and its implementing Internal Regulations, and the provision of the required training to the staff of the Group and to any third-party, where applicable,
- regularly reviewing the Policy and proposing any necessary amendment to keep it updated,
- acting as Supervisor of the Internal Reporting System and managing the Ethics Line,
- handling and following through to completion the cases relating to any breach of the Policy; and
- regularly apprising the Audit and Compliance Committee of the enforcement and compliance with the Policy, in particular, of any serious violation thereof and, of the action taken, where applicable.

7.5 Compliance department

A part of the General Counsel's Office, the duties of the Compliance department include:

- effectively implementing and managing the Policy by taking the appropriate action,

- planning and managing training and awareness-raising about the Policy and its Implementing Regulations,
- regularly reviewing the Policy to ensure its alignment with applicable laws.
- coordinating the process to identify, review and assess the risks covered by the Model, including Anti-Corruption risks,
- identifying and monitoring the measures to prevent and monitor Corruption and driving continuous improvement,
- where appropriate, driving and coordinating action and remediation plans to reach appropriate prevention and control levels,
- assisting and supporting the Ethics Committee where necessary in handling and managing concerns in this field received via the Ethics Line, and
- monitoring compliance with this Policy and regularly apprising the Ethics Committee and, where appropriate, the Audit and Compliance Committee, of the outcome of risk oversight in the field of integrity and Corruption and of the Policy and its implementing regulations.

7.6 Team Leaders

Team Leaders play a key role in promoting an ethical culture within the Inditex Group. In particular, they shall:

- act as role models for ethical conduct in the performance of their duties,
- ensure that the members of their teams are aware of and comply with the Code of Conduct, this Policy and the Internal Regulations implementing it,
- foster an environment of trust that facilitates the raising of queries or reporting of breaches,
- ensure that no retaliation is taken against anyone who raises a query or reports a potential irregularity in good faith; and,
- assist the Ethics Committee in handling queries, where necessary.

7.7 Internal Audit

The duties of the Internal Audit Function include, without limitation:

- pursuant to the Internal Audit Charter and the Annual Audit Plan, assessing independently the suitability and effectiveness of governance and Enterprise risk

management processes relating to Integrity, Anti-Corruption and fraud risks, as set out in this Policy and its implementing Internal Regulations,

/ enquiring about potential violations of the Code of Conduct, this Policy or its implementing Internal Regulations, where such investigation is required by the Ethics Committee, or on its own initiative where signs of Corruption or fraud have been detected.

8. Queries. Ethics Line

Any question about this Policy shall be addressed to the Team Leader, the Human Resources department, the Compliance department or the Ethics Line.

Ethics Line

The Ethics Line is the preferred confidential channel to receive, investigate and resolve the concerns relating to the violation of this Policy. As an exception, where a local or specific line exists, concerns shall be submitted via such line.

Any concerns relating to this Policy received shall be reviewed and, where applicable, where signs of potential breaches exist, the relevant investigation shall be carried out.

The Ethics Line can be accessed on the intranet (INET) and/or on the company's website (www.inditex.com), or via any other communication channel set out in the Ethics Line Procedure, or in the procedures for local or specific lines.

Ethics Line management. Procedure

Concerns shall be handled in accordance with the Internal Regulations, in particular, the Global Policy on the Internal Reporting Channels and the Ethics Line Procedure, both of which are available on INET and on (www.inditex.com).

The Ethics Committee may act on its own motion or at the behest of anyone at Inditex, any manufacturer, supplier or third party engaged in a direct relation or with a lawful business or professional interest, by submitting a concern in good faith. The information exchanged via the Ethics Line is confidential, as is the identity of the reporters acting in good faith. The Group will not retaliate against them.

9. Violation of the Policy

Violation of this Policy may result in serious consequences for the Group or anyone at the Group, including without limitation, disciplinary measures under labour laws or the termination of contractual relations with third parties.

10. Circulation, training and awareness-raising

The Policy is available on the intranet (INET) and on the corporate website (www.inditex.com).

The Compliance department will liaise with the relevant departments and local teams at the subsidiaries to implement the appropriate communication and awareness-raising actions to ensure that the Policy is duly understood and implemented.

Training and awareness-raising shall be tailored to the level of risk associated with the various profiles of group employees and may, where appropriate, be extended to third parties.

The content of the training and awareness-raising materials shall be reviewed periodically to ensure their continued effectiveness.

11. Oversight and monitoring

The Company shall be subject to regular reviews and monitoring, including, where applicable, audits carried out by the Internal Audit department pursuant to its annual work plan, to assess compliance with the Policy.

12. Update and Review

The Policy shall be reviewed and updated on the proposal of the Compliance department where necessary, to embrace statutory or organisational changes within the Group or best practices in the field.

INDITEX