

# INDITEX



Global

## Anti-Harassment Policy

Amended by the Board of Directors on 7 November 2023

## About this Policy

Reference	-
Name	Global Anti-Harassment Policy
Overview	This Policy covers the engagement of the Inditex Group to prevent any form of harassment
Theme	Anti-Harassment, People, Diversity, Human Rights, Ethics Line
Scope	Global
Type	Policy
Supervisor	Human Resources Department
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Version	2.0: Global Anti-Harassment Policy, amended on 7 November 2023  1.0: Global Sexual Harassment and Sex or Gender identity-based Harassment at the Workplace Prevention Policy of the Inditex Group, approved on 15 March 2022

## Table of contents

1. Purpose.....	4
2. Definitions .....	4
3. Scope of application .....	6
4. Overarching principles.....	6
5. Minimum requirements of local policies .....	7
6. Concerns or reports. Procedures and warranties.....	7
7. Roles and responsibilities.....	8
8. Disclosure and training.....	9
9. Oversight and monitoring. Audit.....	10
10. Update and review .....	10

## 1. Purpose

The Global Anti-Harassment Policy (the “**Policy**”) sets out the engagement of the Inditex Group to preventing Harassment within the Group in any form or shape. The Policy builds on the ethical values of the Company and implements certain aspects set forth in the Code of Conduct and Responsible Practices, in the Code of Conduct for Manufacturers and Suppliers and in the internal regulations of the Inditex Group.

Namely, this Policy implements the Code of Conduct of the Group according to which any manner of physical, sexual, psychological or verbal Harassment or abuse to anyone at Inditex is prohibited, as is any other behaviour which may create an intimidating, offensive or hostile work environment.

It further implements the Policy on Human Rights which sets out “*fair, just and favourable working conditions*” among the Group’s operating principles and ensures that anyone at Inditex can work in a working environment free from Harassment, intimidation or violence in any form or shape.

This Policy is based on ILO Convention 190 on the elimination of violence and harassment from the workplace and ILO Recommendation 206 issued in June 2019 on violence and harassment.

This Policy covers the overarching principles in the field of Anti-Harassment that will serve as a framework of reference for the whole Group, pursuant to section 5 hereof. Notwithstanding the foregoing, the enforcement of the Policy should not entail a violation of any applicable law in the markets where the Inditex Group operates.

## 2. Definitions

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

### ***Harassment***

Any unwanted and potentially damaging behaviour which by repetition and systematization is detrimental to a person and creates an intimidating, hostile, humiliating or offensive environment. For the sake of clarity, the affront to the dignity of the victim of any manner of Harassment does not preclude the existence of a potential violation of other fundamental rights of the Victim, such as the right to not being discriminated against, an attack to their mental and physical health etc.,

### ***Virtual harassment (or Cyberbullying)***

Conducts that constitute any form of Harassment carried out using electronic communication systems, by recording, sharing or releasing messages or images that affect the Victim’s privacy or freedom at their work environment, in particular, by using personal data. Use of personal data to create fake identities, circulate untrue narrative and similar proceedings may also qualify as Virtual harassment or Cyberbullying.

### ***Discriminatory harassment***

Any Harassment motivated by any forbidden grounds for discrimination, including without limitation, discrimination based on sex, sexual orientation or identity, gender identity or expression, sexual features, race, ethnicity, creed, age, nationality, disability, or any other feature.

### ***Mobbing***

Any form of Harassment against anyone (one or more individuals) at the Inditex Group, whether at the workplace

or work-related, pursuant to the terms defined below. Horizontal Mobbing takes place when the Victim and the abuser are peers in the company, whereas Vertical Mobbing occurs when the abuser is a superior and the Victim a subordinate, or vice-versa.

### ***Moral Harassment***

Any harassing behaviour aimed at undermining the dignity or integrity of the Person being Harassed.

### ***Harassment based on sex, sexual orientation or identity, gender identity or expression and/or sexual features***

Any form of Harassment based on sex, sexual orientation or identity, gender identity or expression and/or sexual features of the Person being Harassed.

### ***Sexual Harassment***

Any harassing behaviour aimed at undermining the sexual freedom of the Person being Harassed.

Anyone can be a Victim of Sexual Harassment, regardless of their sex, sexual orientation or identity, gender identity or expression and/or sexual features. Although a behaviour pattern is generally involved, sexual harassment may be in the form of a one-time event. By way of an example, the conducts described below might qualify as sexual harassment. They must be reviewed on a case-by-case basis:

- / **Conducts of a verbal nature:** sexual innuendos, sexual propositions or pressure for sex; offensive flirting; lewd or degrading remarks, indirect or obscene remarks; unwelcome phone calls, video-calls, social media contacts, contacts by email or by any other means, whether using corporate or non-corporate assets; offensive messages sexual in nature included in letters or emails or sent via other corporate or non-corporate communication channels or social media; or jokes or remarks on looks and physical appearance.
- / **Conducts of a non-verbal nature:** display of sexually suggestive or pornographic photos, objects or written material; or other actions aimed at other persons, including, without limitation: leering, staring, catcalling, obscene gestures.
- / **Physical behaviours:** unwanted deliberate physical contact, including hugging, kissing, excessive and unnecessary invasion of personal space, or physical violence, including sexual abuse.

### ***Inditex Group or 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.

### ***Inditex (also, the "Company")***

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

### ***Abuser***

Any person associated with the Inditex Group who harasses another person associated with the Inditex Group.

### ***Team leader***

Person in charge of a working group.

### ***Victim or Person being Harassed***

Any person associated with the Inditex Group who suffers physical or moral damage as a result of Harassment.

### 3. Scope of application

The Policy applies to every company within the Group and is binding for anyone at the Inditex Group including members of management, irrespective of their function, title, position, form and place of service provision or type of employment agreement.

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

The Policy extends to anyone at Inditex, at any facility and work centre, who must observe it in the performance of their duties, in their relations with anyone at Inditex and with its customers, suppliers and other stakeholders.

The Policy shall apply to any situation of harassment occurred at the workplace, i.e., in public and private spaces where the work is done at the Inditex Group, as well as during the time spent at work. By way of an example, this includes, without limitation, restrooms, canteens, sanitary facilities, toilets or changing rooms used by employees; during business trips, events or while carrying out work-related social or training activities; in the framework of work-related communications, including those sent using IT systems, liable to be considered as virtual harassment or cyberbullying; in accommodations provided by the Inditex Group; and/or while commuting to and from work ("**Harassment within the scope of application of the Policy**").

### 4. Overarching principles

The Policy builds on the ethical values of the Group and establishes a framework for action for the prevention and elimination of any conduct that constitutes Harassment, based on the following commitments and principles:

#### */ Zero tolerance towards Harassment*

- / Any form of Harassment, abuse or violence against anyone at Inditex, its customers, suppliers or any other stakeholders is prohibited.
- / Harassment in any form or shape is a form of violence and violates a number of fundamental rights. It also entails a breach of the principle of equal treatment and has a negative impact on the working environment of the company where it takes place.
- / The Inditex Group is committed to creating, maintaining and protecting a working environment where the fundamental rights, the dignity, the moral integrity and the sexual freedom of all its members are respected.

#### */ Promoting a culture of prevention*

- / The Inditex Group is committed to raising awareness and training its teams and members in the field of Anti-Harassment, to help prevent any situation, behaviour or practice that might be considered as harassment.
- / The Inditex Group is strongly committed to personal data protection and respect for the right to privacy, to personal portrayal and honour. Consequently, it abides by the principles that govern data protection and privacy at work. Thus, processing of employees' data which might trigger an increased risk of Harassment behaviour is limited to a strict minimum.
- / The Inditex Group will circulate this Policy which is mandatory and undertakes to take awareness-raising and training action to ensure that it is fully understood and implemented.

/ *Protecting victims*

- / Everyone has a right to be treated fairly and with respect and to not being subject to any Harassment situation, irrespective of who is the Victim or the Abuser in the reported situation.
- / The Inditex Group undertakes to prevent, not tolerate, fight and persecute any form of Harassment and to attend to any concerns or reports of Harassment, so that:
  - / Anyone at the Group suffering from any form of Harassment or witnessing any such situation can report the facts with the warranties and following the procedure set out in section 6 below; and,
  - / The non-existence of any form of retaliation against anyone who is the victim of Harassment, has reported a situation of Harassment in good faith or has taken part in the investigation of any such situations is fully ensured.

## 5. Minimum requirements of local policies

Any local policies which may be implemented in line with this Policy in the markets where the Inditex Group operates shall observe as much as possible the structure, overarching principles and provisions of the Policy, adapting or supplementing them where strictly necessary to meet local requirements and/or needs.

In line with the foregoing, any local policies implemented if appropriate, shall include the following minimum requirements:

- / Zero tolerance to any situation of Harassment that may be noted at any level within the Inditex Group should be stated.
- / An Anti-Harassment culture should be encouraged at all levels within the Group, to better prevent any situation, conduct and/or practices that might constitute Harassment in any of its forms.
- / The obligation to conduct prompt, swift and confidential internal investigations of any report of Harassment will be established for the purposes of verifying whether a situation or Harassment behaviour has actually occurred.
- / The need to give support to any victim of Harassment should be stated, to prevent their secondary victimization or re-victimization and provide them with access to any psychological and social support they may require, healing to the extent possible, the harm caused.
- / The absence of retaliation, intimidation or persecution as a consequence of having been a victim of Harassment, having reported it in good faith or having assisted in the investigation, must be ensured.
- / The fact that any retaliation or action in this regard shall be subject to appropriate disciplinary measures should be stated.

## 6. Concerns or reports. Procedures and warranties

The Inditex Group encourages any Victim of Harassment, or anyone who may be aware of a situation of Harassment, to report it via the Ethics Line. Any concerns or reports of Harassment received within the scope of application of this Policy will be investigated by the Company.

The Ethics Line is the preferred confidential line to receive, investigate and resolve concerns about Harassment. As an exception, where there is a local or specific line relating to Harassment, reports shall be sent via this latter.

The Ethics Line may be contacted by email at: [canaletico@inditex.com](mailto:canaletico@inditex.com) or [ethicsline@inditex.com](mailto:ethicsline@inditex.com); by regular post addressed to: Avenida de la Diputación, Edificio Inditex, 15143 Arteixo, A Coruña (Spain), for the attention of the Ethics Committee; or via any other communication channels which may set out in the Ethics Line Procedure or, if appropriate, in the local or specific channels' procedures.

In addition, anyone can send a report or concern about Harassment via their Line Manager or the HR Department.

#### Ethics Line management. Procedure

This Ethics Line is managed by the Ethics Committee, responsible for handling and following through to completion reports of Harassment, except where pursuant to the applicable local laws, a local body has been appointed to handle them.

Reports of Harassment 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).

#### Warranties

Reports of Harassment received shall be handled and investigated fully observing the following principles:

- / Easily accessible procedures, which must have been duly disclosed.
- / Confidentiality and respect for the privacy and dignity of the affected persons.
- / Prohibition of Victim blaming, of concealing a claim or report, or of talking any Victim of Harassment out of reporting it.
- / Respect for the principle of presumption of innocence of the alleged Abuser.
- / Non-retaliation against the Victim or the individuals who support the report, take part in the investigation or report Harassment in good faith.
- / Diligence, promptitude, security, coordination and collaboration in the proceedings.
- / Guaranteeing the Victim's labour and social protection rights.
- / Thorough investigation of the facts, hearing anyone involved and guaranteeing unbiased actions in accordance with the Ethics Line Procedure.
- / Guaranteed action, taking all necessary measures, including if appropriate, disciplinary action, against the person or persons found guilty of Harassment.
- / Compensation for the Victim and protection for their mental and physical health.
- / Gender and human rights approach throughout the proceedings.

## **7. Roles and responsibilities**

#### People within the Inditex Group

Everyone at Inditex must observe this Policy and take the training imparted in the field.

Any Victim of Harassment, or anyone aware of a situation of Harassment can report it via the Ethics Line, with the warranties set out in the foregoing section. In addition, anyone can send a report or concern about Harassment via their Line Manager or the HR Department.



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

The board of directors is charged with approving and/or amending the Policy, following a report from the Audit and Compliance Committee.

The Ethics Committee submits reports to the Audit and Compliance Committee on a regular basis.

#### Ethics Committee

The Ethics Committee reports on the approval and amendment of the Policy and is tasked with overseeing its enforcement. Likewise, the Ethics Committee is tasked with overseeing the Ethics Line and handling and following through to completion the concerns or reports of Harassment or the questions about the Policy, following the opening of the relevant proceedings.

#### HR Department

The HR Department is responsible for implementing, executing and managing the Policy. It is charged, inter alia, with:

- / effectively implementing the Policy by taking the appropriate action.
- / Planning and managing training and awareness-raising about the Policy, namely among team leaders at Inditex.
- / In the event of any Harassment situation, acting in accordance with the principles hereunder set out.
- / Regularly reviewing the Policy, together with the legal Labour team, to ensure that is aligned with applicable laws.

#### General Counsel's Office - Compliance Office

With the collaboration of the HR Department, the General Counsel's Office - Compliance Office will coordinate any review and/or update of the Policy and of any internal regulation that implements it and assess the compliance risks associated with the same. Likewise, with the support of internal areas or the relevant external resources, the General Counsel's Office - Compliance Office will assist the Ethics Committee where necessary to handle and resolve concerns or reports about Harassment and any questions about the Policy.

#### Internal Audit

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

### **8. Disclosure and training**

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

The HR Department will, together with the local teams at the subsidiaries, implement the relevant communication and awareness-raising actions to ensure the appropriate understanding and implementation of the Policy.

In this regard, Inditex will continue advancing training on equality, Anti-Harassment, non-discrimination and respect for human rights to all its members, in particular, to Team Leaders.

Ultimately, all Team Leaders and teams of the HR Department must work towards preventing Harassment by promoting a culture of mutual respect and trust and advancing it to all teams. Where a situation of Harassment arises, a prompt response from the teams of the HR Department is required, acting together with the Ethics Committee.

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

The Company shall be subject to regular reviews and monitoring, including audits carried out by the Internal Audit Department to assess compliance with the Policy.

## **10. Update and review**

The Policy shall be reviewed and updated, where necessary, at the behest of the HR Department, with the collaboration of the General Counsel's Office - Compliance Office, in order to encompass regulatory changes or best practices as may be required at any time for the purposes of fulfilling its goals of preventing and taking action against Harassment in any form or shape.

To review the Policy, a prior report from the Ethics Committee will be required.

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