CONSOLIDATED STATEMENT OF NON-FINANCIAL INFORMATION AND SUSTAINABILITY INFORMATION **2024**



INDITEX

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1. Message from the Chairperson

The solidity of the growth figures detailed in our financial statements for 2024 allow us to continue to look to the future with optimism. We have demonstrated once again that the talent and hard work of our team, our ability to innovate and the ambition with which we approach any new project are key to remaining on the trajectory of growth and profitability that sets Inditex apart.

We remained steadfast in focusing our intention on people. First and foremost, our customers, putting our creativity to work for them, through our collections but also through their experience in our stores, whether in person or online, offering them cutting-edge technology.

Naturally, we continued to go out of our way to provide our employees with a stimulating work environment in which career development is driven by the company's trust in their abilities and commitment. We are proud of our people and their achievements and that translates into a strong sense of belonging and shared pride in making a difference in this venture.

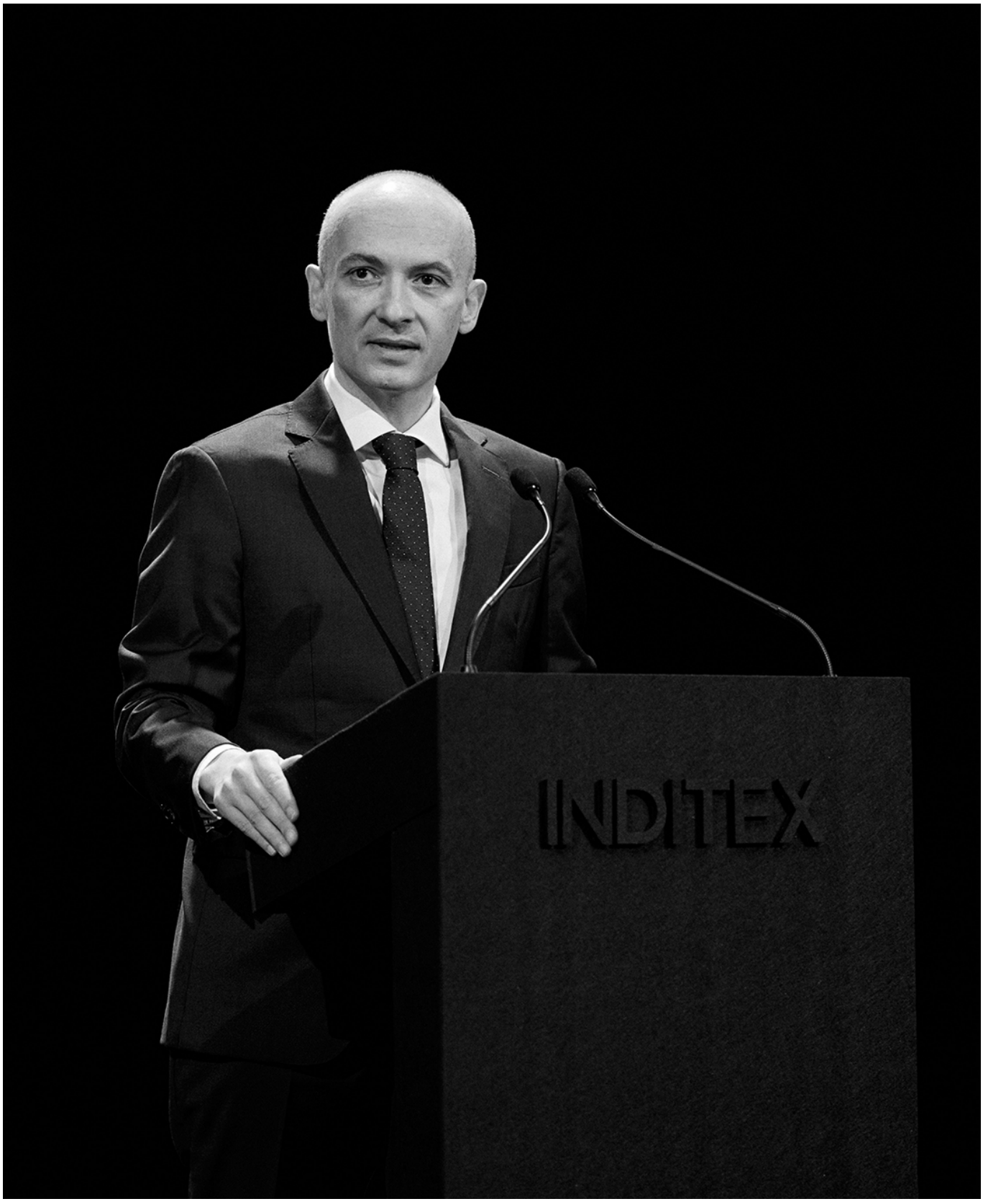
In parallel, we worked hard to consider all of the people who collaborate with us along our supply chain. We work actively to instil our ambition to constantly do better in their workplaces, putting workers at the centre.

We never forget, not even for a minute, that our creative, manufacturing and retailing activities are carried out in communities on which we want to have a positive social and environmental impact. We feel responsible and we act accordingly.

We are working alongside the industry to make our business more sustainable and in 2024 we made some very important progress, which we talk about in this report. We are also looking out for the most vulnerable, once again increasing our contribution through our community investment programmes in 2024.

Far from being satisfied with our achievements, we remain convinced that we can continue to innovate and improve the quality of our work. We are confident that this effort will translate into new accomplishments and the conquest of new challenges, while staying true to our desire to consistently bring excitement, creativity and a dash of the magic that makes Inditex a very unique project.




INDITEX

2. CEO's statement

Inditex is a company with a powerful corporate culture and solid roots. The Group's strong performance in 2024, detailed throughout this Annual Report, is the result of these qualities, our refusal to settle and our innovative drive, which guide everything we do and allow us to navigate any environment, no matter how uncertain or complex, with confidence.

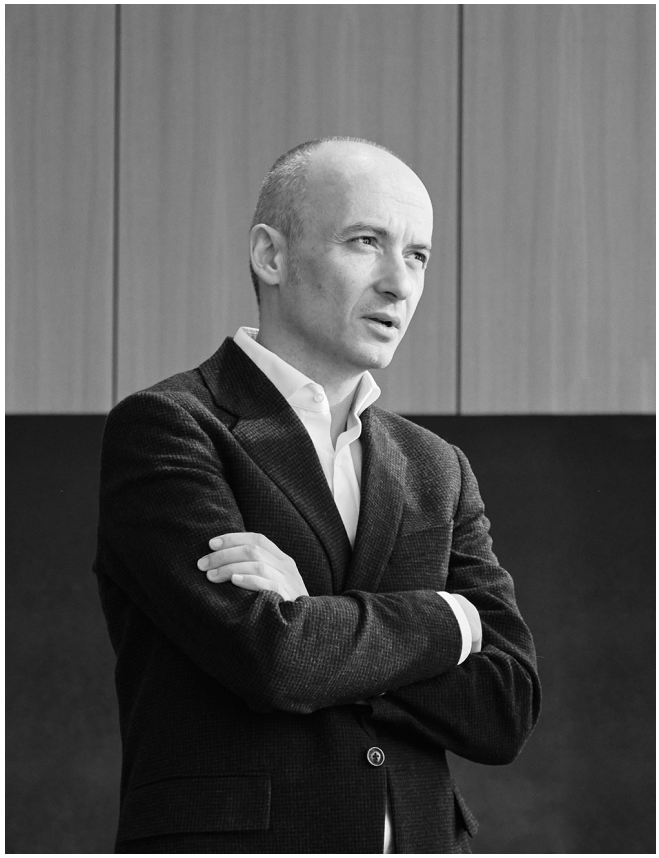
The directions the fashion world will take are difficult to predict. Fashion is, by definition, constant change and innovation. That gives us an advantage: our very business forces us to read and listen to our surroundings constantly in order to respond nimbly, adapt and provide our customers with what they want at any moment of time, always living up to the expectations of society. Our results for 2024, which are very positive, reflect our teams' dedication and success tackling these challenges.

In the last few months, specifically between 1 February 2024 and 31 January 2025, we delivered on the commitments we made to our stakeholders, as detailed throughout the various chapters of this report. Our collections were once again warmly welcomed by our customers: Group revenue increased by 7.5% year-on-year, underpinned by growth across all our retail formats.

These achievements can only be explained by the talent of our designers and creative professionals and the performance of our sales, logistics and corporate teams. The mutual and complementary support provided by our physical stores and online platforms is another key differentiating factor, while all of our brands, without exception, launched innovative projects in 2024. Some aim to reach new customers, while others seek to get closer to their followers in new ways, offering them new experiences, each stamped with their own style and identity. We once again demonstrated that ambition and audacity, not being afraid to launch innovative proposals (some in partnership with prestigious designers and artists), form part of Inditex's identity.

Our brands' physical stores continue to enter new markets (reaching 97 in 2024), accompanied by more visits to our online platforms (over 8,000), more active app accounts (218 million) and more social media followers (257 million across all our brands). By the end of this year, we were selling our fashion proposals to customers in 214 markets thanks to our online reach.

Our execution was framed by efficiency, marked by a record gross margin and stringent control over operating expenses. Net profit was 9% higher than in 2023, while our net cash position topped €11.4 billion.



Getting ready for the future

2024 was also marked by intense work to get ready to take advantage of growth opportunities going forward. We are executing our 2024-2025 logistics expansion plan, increasing our capacity through projects for several of our retail formats in Zaragoza, Lelystad (Netherlands) and Valencia. These are strategic investments that uphold stringent sustainability standards and incorporate cutting edge technology.

In our model, the product and customer experience go hand in hand. That is something we are very much keeping in mind as we look to the future. That is why our brands are driving continuous improvements in the design and image of their retail spaces. All of our formats continue to assess new formulas for using their surface area by tapping into new ways of displaying our products and providing new customer experiences. The combination of technology and our teams' know-how when it comes to looking after each type of customer are the drivers underpinning these advances. Visiting any of our brands' stores will remain a special experience.

Continuous improvement and innovation also guided our progress on the sustainability front in 2024. We made important strides in the use of lower impact and recycled fibres, with the latter already accounting for more than one-third of the textile materials we use.

In this same vein, in 2024, we tightened our ties with promising startups specialised in next-generation fibres under different forms of partnership. We continue to offer them our knowledge of textile processes and fashion and access to our network of partners and suppliers so that they can scale up their activity and align their research and lines of initiative with market demands. In short, so that they can effect change.

Partnership is also the backbone of our Supply Chain Transformation Plan, launched last year. We are leveraging that plan to support and advise our suppliers and manufacturers so that they can meet more ambitious requirements around water management, chemical substances, waste and emissions. As a result of this and other initiatives, we made further progress towards a low-carbon economy: between 2018 and 2024, while our sales registered growth of 47%, our emissions came down by 5%. As for emissions generated by our own operations only, the reduction over that same timeframe increases to 88%.

Looking after our professionals

Facilitating our professionals' career development was a priority once again. Inditex's unwavering effort to do better is underpinned by our teams' commitment, dedication and passion for learning and innovating. In 2024, we provided our people with 3.3 million hours of training and filled 70% of our vacancies through internal promotions.

We remained committed to diversity and inclusion, achieving our goal of doubling the number of employees with disabilities over a two-year period and bringing our For&From platform to new markets. We made these inroads in a year in which Inditex signed the European Union's Diversity Charter, a commitment to fostering the principles of equality, diversity and inclusion in the workplace.

Committed to our surroundings

In 2024, we continued to work to have a positive impact on our business communities beyond the strict sphere of our organic influence as a fashion company. Our people devoted more than 353,600 hours to community initiatives. We supported 953 social and environmental programmes in partnership with 485 community organisations and initiatives.

The corresponding sections of this report outline the most important work done in our communities. I would like to use these lines to specifically recall the tragic floods that engulfed Valencia last October, which affected members of our team and had an extremely hard impact on one of our closest communities.

How Inditex sees the future

The various chapters of this report give a very detailed account of our Group's activities and performance throughout 2024. They also provide a snapshot of how Inditex sees a future filled with major opportunities:

- With a family of well-differentiated retail formats empowered to act autonomously both creatively and commercially;
- With a broad web of partners and suppliers located in dozens of areas;
- With a powerful sales reach so that we can bring our responsibly-made, sophisticated fashion propositions all over the world.
- And with a shareholder and financial structure that locks in the stability and strength needed to continue to invest, changing and innovating as needed.

That is how the creative, international and varied adventure that is Inditex welcomes in 2025, the year in which we will celebrate the 50th anniversary of the first Zara store. We are ready to continue to create quality fashion that helps make people's lives that little bit better.



Óscar García Maceiras
Chief Executive Officer

3. Inditex at a glance

Key data in 2024

2024 milestones



Key data in 2024

214
markets

+8,000 M
visitors to the Group's online stores



Key indicators

38,632M€
net sales

5,866 M€
profit

11,495 M€
net financial position

4,797 M€
dividends

9,341 M€
total tax contribution



A unique team

162,083
employees

170
nationalities

73%
women

70%
of vacancies covered by internal promotion

+3,000
Changemakers
or in-house sustainability ambassadors



Corporate Community Investment

+134 M€
investment

+4.6 M
beneficiaries

7.2 M
donated items from our collections

+353,600
hours contributed by our people to social or environmental initiatives



Supply Chain

6,615
factories

1,817,233
reached by Workers at the Centre during the year

Headquarters effect

6,594
product and general services suppliers in Spain

7,632 M€
invoicing to suppliers in Spain

2024 milestones

Continuous improvement in commercial presence
We continue to improve our commercial presence in all commercial formats with such notable examples as the Zara Rossio store in Lisbon. Massimo Dutti Miami Aventura Mall, Bershka London Oxford Street, Pull&Bear and Oysho on Milan's Via Torino, Stradivarius Bogotá Calle 82, Zara Home Dubai Mall; along with the arrival of Oysho and Stradivarius in Peru, with stores in Lima Jockey Plaza.



Outstanding collaborations
Our brands feature innovative and trend-setting proposals by prominent designers and artists, such as Massimo Dutti's collaboration with renowned artist Marina Abramović for Miami Art Week 2024 to mark the brand's arrival in the US market, Zara's collections with designer Stefano Pilati and with model Kate Moss, Stradivarius' initiatives with Iranian designer Safu Seghatoleslami or Danish designer Jane Kønig, Bershka's venture with British creative director Jamie Reid, or that of Zara Home with Lucinda Chambers, co-founder and creative director of Collagerie.



Store image in constant renovation
The new store design created by Zara's Architecture Studio is reflected in openings, extensions and relocations such as Madrid Hermosilla, Valladolid Constitución, Liverpool One, Dublin South King, Birmingham Bullring, Istanbul Istinye, Thessaloniki Tsimiski, Los Angeles Topanga and Bangalore Mall of Asia. Pull&Bear, meanwhile, has cemented its renewed store image at the flagship store in Rotterdam (the Netherlands), with a large surface area, and in Beaugrenelle shopping mall in Paris (France), with its multi-dynamic space. Oysho has brought its new brand image to the renovation of its flagship store in Plaza de Lugo, A Coruña.

Recognition as an employer
Inditex obtained 'Top Employers' certification in 12 of our most important markets, a distinction granted to companies that place their people at the centre of what they do, creating working environments that generate a sense of belonging, in which they feel accepted, are free to express their ideas and are listened to.



Innovation in sustainability
Inditex has announced a capital investment in Galy, a US startup that has developed innovative technology for lab-growing cotton from cotton stem cells. In August 2024 we launched our second CIRCxZara collection, designed by Zara Studio and made from textile waste. It was also agreed to make an investment in Epoch Biodesign, a startup that uses artificial intelligence to design enzymes that allow the recycling of plastic and textile materials, and in Infinited Fiber, a startup specialised in the recycling of cellulosic materials and creator of Infinna™. Both are alternative to transform waste into new materials, promoting textile-to-textile circularity.

Logistics Expansion Plan
In light of the significant opportunities for future growth, Inditex is implementing a Logistics Expansion Plan in 2024 and 2025. This extraordinary two-year investment programme focused on business expansion allocates 900 million euros to boost our logistics capacity in each of the financial years 2024 and 2025. The main projects will be: a new Zara distribution centre in Zaragoza and an extension to the one in Lelystad (the Netherlands); a new Bershka distribution centre in the region of Valencia and a new Tempe distribution centre in Sagunto (Alicante). These investments meet the strictest sustainability standards and include cutting-edge technology.

Support to those affected by the floods in Valencia
Inditex donated four million euros to the Red Cross and Caritas to support persons hit by the humanitarian emergency. Likewise, more than 350,000 items (clothing, footwear and household kits) were delivered to the Red Cross, Caritas and Fundación Entreculturas to be distributed in the affected area.

Inclusion of people with disabilities
We met our goal set in 2023 of doubling the number of people with disabilities in our workforce. Thus, at the end of 2024, at Inditex we directly employ 3,142 people with disabilities. We promote sustainable hiring with a long-term strategy, ensuring inclusive selection processes for people with different types of disabilities.

Commitment to diversity
We participated in the European Diversity Month, organised by the Diversity Foundation and the Representation of the European Commission in Spain. At this event, Inditex signs the European Diversity Charter in Spain, a commitment based on the promotion of the principles of equality, diversity and inclusion in the workplace.



Renewal of the collaboration with Médicins Sans Frontières (MSF)
The Group contributed a further 2.5 million euros to this organisation's emergency relief, humanitarian and refugee and migrant care programmes. Since 2008 we have earmarked more than 37 million euros for this cooperation, supporting numerous medical-humanitarian response projects in various parts of the world.

Biodiversity protection through The Great People's Forest
Inditex contributed three million euros to The Great People's Forest, one of the largest nature restoration initiatives in southern Asia. This project focuses on conservation in the Eastern Himalayas region, in which more than a billion people reside and which provides one-twelfth of all the Earth's biodiversity. It is important to highlight the mobilizing capacity of this initial contribution.

Nurturing creative talent
By launching the Creatives initiative we identify and foster a talented new generation of designers in our creative teams.

In tandem with the world's top fashion schools, we seek out new talent to whom we offer a unique training and professional development experience, furnishing them with the key tools to overcome the challenges of a constantly evolving industry.

We updated our Code of Conduct
The Group updated and added new commitments to the Code of Conduct that governs our activity, always grounded upon five essential principles: Respect, Honesty, Integrity, Transparency and Responsibility.



Expansion of the for&from project
The for&from project for the inclusion of people with disabilities continues its expansion with the opening of stores in Lisbon (Portugal) and Mexico City (Mexico). The store located in Lisbon, with Zara Home products, is a favourable environment for the social and labour integration of the 17 people on the staff and is carried out in conjunction with the community organisation Asociación VilacomVida. The for&from store in Mexico City, which offers shoes and accessories from several of our brands in collaboration with Tempe, is managed by CONFE.



Continuous improvement in labour practices in partnership with UNI Global
Inditex and the trade union federation UNI Global Union -which represents 20 million workers in more than 150 countries- renewed their Global Agreement to implement best labour practices. The new framework addresses challenges such as the inclusion of workers with disabilities, as well as combating sexual harassment and gender-based violence.

4. General disclosures

[ESRS 2]

BP. Basis for preparation

GOV. Governance

SBM. Strategy

IRO/MDR. Impact, risk and opportunity management



BP. Basis for preparation

BP-1. General basis for preparation of the Report

BP-1_01

In the **2024 Consolidated Statement of Non-Financial Information and Sustainability Information**, we present information concerning the sustainability performance of the Inditex Group (hereinafter also the 'Group', the 'Inditex Group' or the 'Company') —which includes the individual companies consolidated under the Group parent company, Industria de Diseño Textil, S.A. (Inditex, S.A.)— in the financial year 2024 (from 1 February 2024 to 31 January 2025).

Accordingly, we present our Annual Report 2024, including the Inditex Group's Consolidated Annual Accounts, followed by the Consolidated Directors' Report, also comprising the Consolidated Statement of Non-Financial Information and Sustainability Information (hereinafter, the 'Report').

BP-1_02

With regard to the scope of information reported in the Report, it includes all the companies over which the Inditex Group has control or joint control, listed in *Annex I* of the Consolidated Annual Accounts. Any changes therein with respect to 2023 are specified in *Note 3* to the Consolidated Annual Accounts. The jointly controlled entities, which are the entities that make up the Tempe Group (see *Note 28* to the Consolidated Annual Accounts), they are included in this Report at 100% in all reported metrics, unlike in the individual annual accounts, where they are booked using the equity method.

BP-1_03

Considering that this Report contains consolidated information for all the Group companies, all the individual companies that consolidate under the parent company of the Group, Industria de Diseño Textil, S.A. (Inditex, S.A.) are exempt from publishing an independent report under the framework of Spanish Act 11/2018 and under the European Corporate Sustainability Reporting Directive (CSRD).

BP-1_04

The Consolidated Statement of Non-Financial Information and Sustainability Information includes important information about the Company, from the operations themselves (such as the design of our garments and the physical and online sales), to the various stages of the value chain (including both upstream and downstream activities).

The report includes additional information regarding the scope of the indicators referring to the value chain. The breakdown of the relevant metrics is provided in the *Methodological Annex.*

BP-2. Disclosures in relation to specific circumstances

Reporting framework

BP-2_16;
BP-2_17

Through this Report we fulfil the legislative requirements of the Spanish legislation in force, Act 11/2018, on non-financial information and diversity, and we also meet, voluntarily and in advance, the requirements of the CSRD Directive as well as the European Sustainability Reporting Standards (ESRS), which are applicable to us based on our materiality assessment.

Accordingly, this report follows ESRS structure and takes as a reference the 'IG 3: List of ESRS Datapoints' guidance issued by the European Financial Reporting Advisory Group (EFRAG). The correlation with applicable material datapoints is shown in the left-hand margin of the report.

ⓘ More information on the correlation of requirements reported can be found in the *Contents Indexes* section of this Report.

We also comply with the EU Taxonomy Regulation (Regulation (EU) 2020/852 of the European Parliament and of the Council on the establishment of a framework to facilitate sustainable investment).

In addition to responding to legal requirements that apply to Inditex, we also follow the guidelines of the main reporting initiatives and entities, such as:

/ Principles of the Sustainability Accounting Standards Board (SASB) framework

/ Global Reporting Initiative (GRI) Standards or GRI Standards

/ Recommendations of the Task Force on Climate-related Financial Disclosures (TCFD)

/ The principles of the International Integrated Reporting Framework

How we report

Time horizons

BP-2_01;
BP-2_02

Time horizons referred to in this Report correspond to those established in ESRS 1, section 6.4. This means:

/ **Short-term:** the reporting period in the financial statements, 12 months from the end of the financial year.
/ **Medium term:** from the end of the reporting period up to five years later.
/ **Long term:** more than five years.

For the specific case of the presentation of information relating to chapter *E1. Climate Change*, the time horizons shown differ from these since their definition, which was prior to the entry into force of the CSRD Directive, is in keeping with best practices in disclosure —such as the Task Force on Climate-related Financial Disclosures (TCFD) framework— based on the consideration that the definitions provided best reflect the potential occurrence of climatic events.

The following time horizons are specifically used in this case:

/ Short-term: up to five years.
/ Medium term: between five and ten years.
/ Long term: more than ten years.

However, for the purposes of the materiality assessment, the time horizons of the climate-related impacts, risks and opportunities have been reconciled with those provided in ESRS 1.

Calculation methodology

BP-2_03;
BP-2_04;
BP-2_05

The information on the reported sustainability indicators corresponds to primary, secondary or modelled data[2], expert opinion or a combination of those. When source data are not available, estimates or assumptions based on trends in actual data, as well as information from external sources, are used, provided that there is a reliable source of information and its use is supported by industry or subject experts and that the estimated information meets the qualitative information requirements as defined in ESRS 1.

These estimates are used mainly to disclose emissions and consumption throughout the value chain, as well as to report information relating to raw materials source data, the direct measurement of which is hard to access, given its geographical and operating diversity.

The *Methodological Annex* includes the calculation methodology and scope of the information reported on the metrics and targets and —specifically for the value chain indicators— details on the use of indirect information sources used in their preparation along with the degree of estimation.

BP-2_06

Consequently, it should be noted that the methodologies currently used in the reporting and calculation of sustainability indicators will continue to evolve going forward. Hence, as we move towards globally harmonised reporting, it may be necessary to restate historical data as well as future pathways in the next few years. In particular, for indicators on the value chain, there are currently difficulties in obtaining rigorous and comprehensive information. Nevertheless, in the next few years an improvement in the availability of information is planned, along with the future development of new data sources.

BP-2_07;
BP-2_08;
BP-2_09

On the other hand, throughout this Report, for those metrics that are subject to a high degree of uncertainty, the reasons for said uncertainty have been specified, along with the measurement methodology if applicable (including assumptions and approximations made).

It is also important to highlight that in preparing the Report various future projections were made which, by nature, involve a high degree of uncertainty and inherent risk.

[2] Primary data is defined as data obtained directly from the original source, secondary data as data obtained from bibliographic sources, and modelled data as data obtained from mathematical models in which both primary and secondary data may be used.

Modifications with respect to previous years

BP-2_10; BP-2_12; BP-2_13; BP-2_14

The historical values reported may be subject to changes from those reported in previous years. These modifications may be due to methodological updates, changes in data sources, correction of inaccuracies or other issues. In such cases, and where practicable, we have restated the information from previous years to make it comparable.

ⓘ More information on the indicators subject to modifications can be found in the *Methodological Annex* of this Report.

References to other documents

BP-2_20

It should be noted that in the Consolidated Statement of Non-Financial Information and Sustainability Information no content required by ESRS has been incorporated by reference. However, throughout the document, cross references are included between the different sections of the Report where related information can be found.

In addition, at Inditex we also have public contents where some of the issues dealt with in this Report are expanded. In these specific cases, references have been included to the additional communication materials that are available on our corporate website, remaining outside the scope of the external verification.

External assurance

BP-2_18; BP-2_19

The information included in the Consolidated Statement of Non-Financial Information and Sustainability Information has been verified by an independent third-party, Ernst & Young. The scope and results of this independent verification are described in the Verification Report attached hereto.

This Report has been reviewed in accordance with generally accepted professional standards applicable in Spain and specifically with the guidelines contained in Guidelines 47 Revised and 56, issued by the Instituto de Censores Jurados de Cuentas (ICJCE) of Spain on non-financial information verification assignments and considering the content of the note published by the Instituto de Contabilidad y Auditoría de Cuentas (ICAC) on December 18, 2024, based on ISSA 5000 and the non-binding guidelines of COESA.

ⓘ More information in section *9. Independent Verification Report* included in this Report.

GOV. Governance

GOV-1. The role of the governing bodies

Group's Corporate Governance System

Inditex has a Corporate Governance System comprising a series of bodies, rules, procedures and mechanisms to guarantee that the directors and the management team, who are responsible for the governance of the Company, carry out their duties in a diligent, ethical and transparent manner, and are accountable for their activity, which is subject to verification and control, both internal and external. At the same time, it ensures that no individual or small group of individuals holds decision-making power within the Company that is not subject to checks and balances, and that no shareholder receives privileged treatment over other shareholders.

At present, Inditex's Corporate Governance System fully complies with the regulatory requirements set forth in the applicable legislation, and fully adheres to the recommendations outlined in the Good Governance Code (GGC) of Listed Companies of the Spanish National Securities Market Commission (CNMV).

In addition, in 2024, the Group obtained the highest score in the Good Corporate Governance Certification from AENOR, which verifies a high degree of compliance with the best practices applicable in this area.

Organisation of our Governing Bodies



General Meeting of Shareholders

The General Meeting of Shareholders duly convened and with a quorum present in accordance with all statutory requirements and those provided for in its own Regulations, is the supreme and sovereign body for the expression of the corporate will. .

Inditex's 2024 Annual General Meeting (hereinafter, also the '2024 AGM') was held on 9 July 2024 in hybrid format, with in-person and remote attendance and participation. Agenda items included the approval of the Annual Accounts and the grant of discharge to the directors of the Company.

ⓘ More information on the regulation, organisational and operational rules and the details of the resolutions passed at the 2024 AGM in section *B. General Meeting of Shareholders* of the Annual Corporate Governance Report.

Board of Directors

Except for any matters reserved for the General Shareholders Meeting, the Board of Directors is the Company's highest decision-making, supervisory and monitoring body. It has been entrusted with corporate management, administration, operation and representation, generally delegating the management of Inditex's day-to-day business to the management team and the internal committees. Its activity concentrates on the general function of oversight, which includes guiding Inditex's strategy and approving its policies, monitoring the management bodies, assessing the performance of the directors, adopting the most important decisions for the Company and liaising with shareholders.

Organisation and operation of the governing bodies

GOV-1_01; GOV-1_02; GOV-1_07

The composition of the Board of Directors at the end of the financial year was as follows:

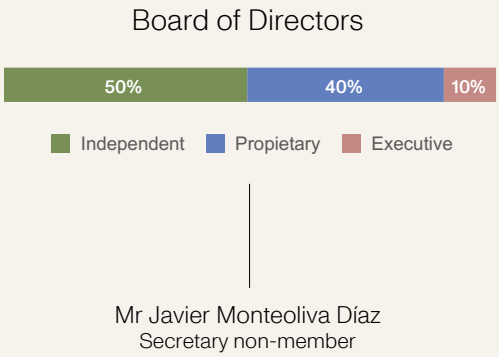
Ms Marta Ortega Pérez
Non-executive Chair

Mr José Arnau Sierra
Deputy Chair

Mr Óscar García Maceiras
Chief Executive Officer

Mr Amancio Ortega Gaona
Founder - Proprietary Director

Ms Flora Pérez Marcote
Proprietary Director



Mr Javier Monteoliva Díaz
Secretary non-member

Ms Pilar López Álvarez
Independent Director

Ms Belén Romana García
Independent Director

Mr José Luis Durán Schulz
Independent Director

Mr Rodrigo Echenique Gordillo
Lead Independent Director

Bns. Denise Patricia Kingsmill
Independent Director

Accordingly, the Board of Directors of Inditex comprises one executive director and nine non-executive directors, of whom four are proprietary and five are independent. Based on the foregoing, there is an ample majority of non-executive directors on the Board and the number of independent directors represents 50% of all members, all in accordance with the GGC recommendations and applicable best practices.

GOV-1_03

There is no direct worker representation on the Company's administrative, management and supervisory bodies, as this is not mandatory under Spanish law and applicable good governance recommendations, unlike in other jurisdictions, nor is it standard market practice among comparable Spanish companies. However, the Company pursues dialogue and relations with its employees through various channels and initiatives, which are described in this Report.

Board of Directors Committees

GOV-1_08; GOV-1_09

To carry out its supervisory duties, the Board of Directors has a series of committees (some of them statutory in nature for being mandatory), internal and permanent bodies, for informative and consultative purposes. They do not have executive functions, but powers of reporting, supervision, advice and proposal within the scope of the duties assigned to them.

These committees are comprised solely of non-executive directors, most of whom must be independent directors.

Sustainability Committee

This Committee, whose existence is not mandatory, was created in 2019 to foster the Group's sustainability strategy.

The main mission of the Sustainability Committee is to support the Board of Directors in aspects relating to the Group's sustainability practices, by supervising its strategy and overseeing proposals in this area, in the social, environmental areas and the area of health and safety of the products marketed by the Company, or by any Group company, as well as to foster the commitment to the Sustainable Development Goals. It is also the body responsible for overseeing effective liaisons with stakeholders in the field of sustainability.

The Committee is also vested with certain powers in connection with the supervision of the process of preparing the sustainability information that the Company discloses publicly (with the scope and limitations detailed below).

Pursuant to the Sustainability Committee's Regulations, its members are appointed in such a way as to ensure that they — and in particular its chair— have the knowledge, expertise and experience to match the functions they are called upon to perform, including, among others, in connection with sustainability, social action initiatives, sustainable management of resources and the design of stakeholder communication policies.

The composition of the Committee at the reporting date was as follows:

Member	Position	Directorship type
Bns. Denise Patricia Kingsmill	Chair	Independent
Mr José Arnau Sierra	Ordinary Member	Proprietary
Ms Pilar López Álvarez	Ordinary Member	Independent
Ms Belén Romana García	Ordinary Member	Independent

Audit and Compliance Committee

The main mission of the Audit and Compliance Committee is to oversee and monitor the independence of the statutory auditor and the effectiveness of the enterprise risk management system covering both financial and non-financial risks — without prejudice to the ultimate responsibility of the Board of Directors. It also has powers of oversight and assessment over the process of compiling and presenting the financial and non-financial (sustainability and corporate governance) information included in the mandatory annual reports, and of the independent verification of that information. These tasks are carried out in coordination with the Sustainability Committee in connection with the matters within its purview (as described below).

In accordance with the provisions of the Audit and Compliance Committee's Regulations, the members of the Committee as a whole —and in particular its chair— must be appointed in consideration of their knowledge and experience in accounting, auditing and risk management, both financial and non-financial, as well as their industry-specific knowledge.

The composition of the Committee at the reporting date was as follows:

Member	Position	Directorship type
Mr José Luis Durán Schulz	Chair	Independent
Mr José Arnau Sierra	Ordinary Member	Proprietary
Bns. Denise Patricia Kingsmill	Ordinary Member	Independent
Ms Pilar López Álvarez	Ordinary Member	Independent
Ms Belén Romana García	Ordinary Member	Independent
Mr Rodrigo Echenique Gordillo	Ordinary Member	Independent

Nomination Committee

The main purpose of the Nomination Committee is to help attract and retain talent in the Company, ensuring that the Company has the best professionals in its governing bodies and Senior Management and that the applicable selection policies are consistent with the Company's strategy.

The composition of the Committee at the reporting date was as follows:

Member	Position	Directorship type
Ms Belén Romana García	Chair	Independent
Mr José Arnau Sierra	Ordinary Member	Proprietary
Ms Pilar López Álvarez	Ordinary Member	Independent
Mr José Luis Durán Schulz	Ordinary Member	Independent
Mr Rodrigo Echenique Gordillo	Ordinary Member	Independent

Remuneration Committee
The Remuneration Committee's main mission is to help attract and retain talent in the Company through the remuneration policies applicable to directors and members of senior management.

The composition of the Committee at the reporting date was as follows:

Member	Position	Directorship type
Mr Rodrigo Echenique Gordillo	Chair	Independent
Mr José Arnau Sierra	Ordinary Member	Proprietary
Bns. Denise Patricia Kingsmill	Ordinary Member	Independent
Mr José Luis Durán Schulz	Ordinary Member	Independent

ⓘ More information on the rules governing the organisation and operation of the Board of Directors and of the Committees in section *C. Company management structure* of the Annual Corporate Governance Report.

Other relevant internal bodies

The Company has a series of permanent internal, consultative bodies, without executive functions, with powers to inform, advise and make proposals to the Company's governing and management bodies, as they discharge their duties.

These bodies are composed entirely by persons from outside the Company to provide strategic and independent advice to the Group's governing bodies on key issues for the Company.

Cybersecurity Advisory Committee
The Cybersecurity Advisory Committee is the independent expert advisory body on information security and, in particular, cybersecurity. This Committee supports and advises the Board —through the Audit and Compliance Committee— and the Chief Information Security Officer (CISO) on such matters so as to ensure an effective system for protecting the Group's information.

The composition of the Committee at the reporting date was as follows:

Member
Mr Christopher Cox Krebs
Ms Hazel Dolores Díez Castaño
Mr José Manuel González-Páramo Martínez-Murillo
Mr Herbert Hugh Thompson
Ms Maria Markstädter
Ms Marene Nyberg Allison
Mr Juan Alberto Yépez

Social Advisory Board
The Social Advisory Board is the expert advisory body on sustainability, both social and environmental, and provides support and advice to the Board —through the Sustainability Committee— and to the Management on these matters. The Social Advisory Board also arranges and institutionalises dialogue with those spokespersons considered key in the civil society in which we develop our business model and plays, in addition, an important role in our double materiality assessment.

The composition of the Social Advisory Board at the reporting date was as follows:

Member
Ms Paula Farias Huanqui
Ms Cecilia Plañiol Lacalle
Mr Ezequiel Reficco
Mr Jean Jacques Salaun
Mr Francisco Javier Sardina López
Mr Victor Viñuales Edó

Management Committee

Inditex's Management Committee is responsible for coordinating the company's management and supports the CEO in the exercise of his duties. Although it has no delegated executive functions, this Committee was set up to promote, in keeping with best practices, an environment of collegiate decision-making at the most senior level, as well as the exchange of opinions and considerations among directors.

The Management Committee has comprised those Group executives who are deemed able to provide a vision conducive to a comprehensive understanding of the Group's reality at all times, thus underpinning the management and implementation of the Group's strategy.

Its composition at the reporting date is as follows:

Member	Position
Mr Miguel Díaz Miranda	Chief Financial Officer & Chief Operating Officer, Zara
Mr Ignacio Fernández Fernández	Chief Financial Officer
Mr Antonio Flórez de la Fuente	Bershka Director
Mr Javier García Torralbo	Chief Digital Officer
Ms Begoña López-Cano Ibarreche	Chief People Officer
Mr Javier Losada Montero	Chief Sustainability Officer
Ms Beatriz Padín Santos	Zara Woman Director
Mr Jorge Pérez Marcote	Massimo Dutti Director
Mr Óscar Pérez Marcote	Zara Director
Mr Jordi Triquell Valls	Stradivarius Director

Diversity in our governing bodies

Diversity in the governing bodies ensures there are multiple perspectives, helping to identify risks and opportunities and, therefore, to achieve corporate objectives. It also encourages the promotion of equal opportunities across the organisation, nurturing a diverse and inclusive workplace.

In this regard, at Inditex, we have: (i) the Diversity and Inclusion Policy, which establishes the framework that promotes the values of diversity, multiculturalism, acceptance and integration in all the Group's entities and is driven by the most senior levels of the Company, and (ii) the Diversity of Board of Directors Membership and Director Selection Policy, which sets forth the criteria for the selection of directors to guide the activities of the relevant corporate bodies.

Furthermore, in accordance with applicable best practices, the Company has a Board Skills Matrix, which identifies the skills of the members of the Board of Directors at any given time, in terms of education and professional experience, among other aspects. The Skills Matrix is updated periodically and whenever there is a change in the composition of the Board. Therefore, the matrix is a useful tool for establishing the criteria for the possible assessment of new candidates.

The Nomination Committee is the Board specialised committee involved in the process of selection, nomination, ratification and re-election of our directors, ensuring an appropriate composition of the Board and its Committees. With regard to gender diversity, the Committee has consistently strived to achieve and retain high levels of female representation on the Board of Directors, as can be seen in the following table:

GOV-1_04;
GOV-1_05;
GOV-1_06

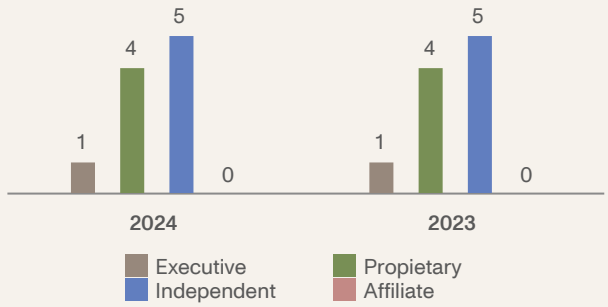
Percentage of women represented in the governing bodies

Governing Body	2024	2023
Board of Directors	50%	50%
Audit and Compliance Committee	50%	50%
Nomination Committee	40%	40%
Remuneration Committee	25%	25%
Sustainability Committee	75%	75%

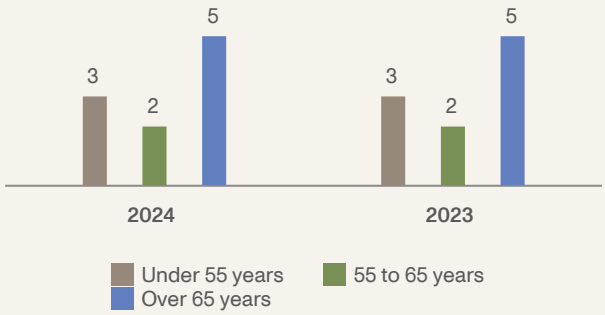
Therefore, the Company currently has an equal representation of men and women on Inditex's most senior governing body, which is above the target established for the least represented gender on the boards of directors of listed companies, as provided in Spanish Organic Law 2/2024, of 1 August, on the equal representation and balanced presence of women and men, which transposes Directive (EU) 2022/2381 of the European Parliament and of the Council of 23 November 2022 on improving the gender balance among directors of listed companies and related measures.

Main diversity indicators of the Board of Directors of Inditex for financial year 2024 and their performance

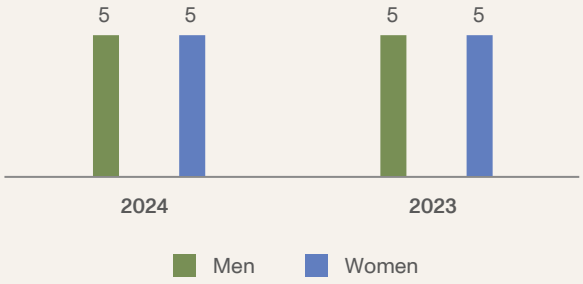
Directorship type



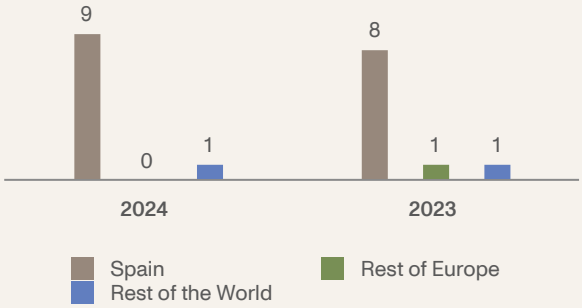
Age



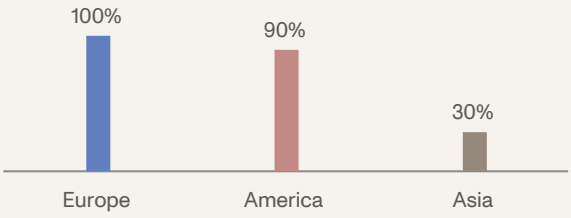
Gender



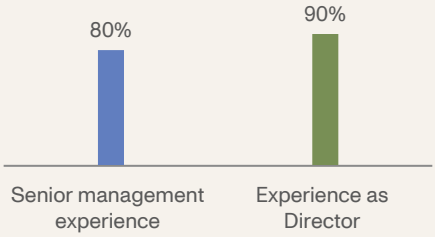
Geographic origin



International experience/ Education

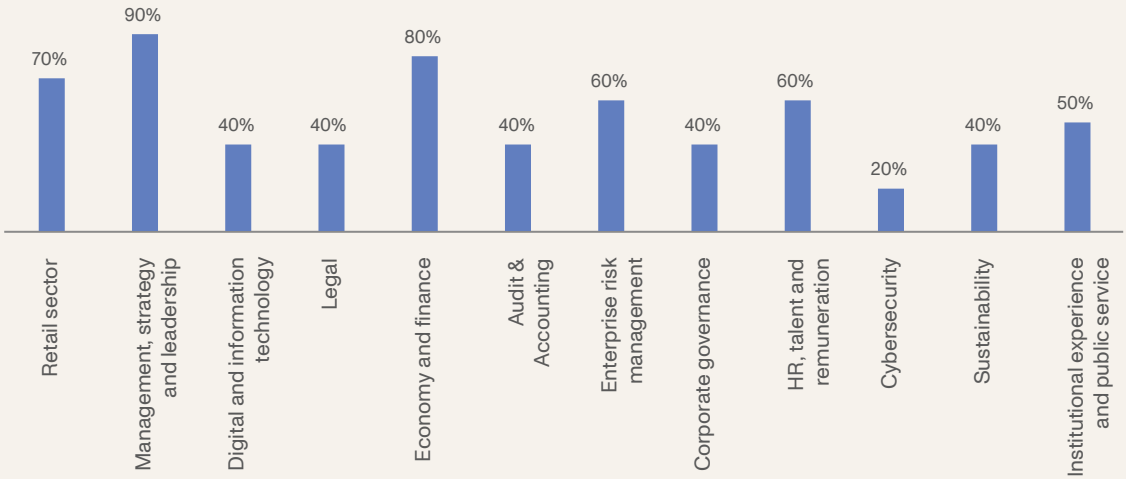


Previous experience



GOV-1_16

Board of Directors Skills Matrix



ⓘ The CV of the members of the Board of Directors is available in the 'Shareholders' section of 'Corporate Governance - Board of Directors' of our corporate website.

GOV-1_15;
GOV-1_17

Overall, in accordance with the updated Board Skills Matrix, the structure and current composition of the Board of Directors to this date is deemed to maintain a high level of balance, stability and diversity that is materialised in the form of an equal presence of men and women and an adequate balance of skills, knowledge and experience, appropriate to the interests of the Group.

In addition, the Company provides its directors with a continuous training programme, ITX Board Academy, to ensure that they are kept abreast and to supplement and reinforce their knowledge in connection with current topics (such as legal developments with an impact on the Group). In 2024, directors received training from prestigious external advisors in connection with the following key areas for the Company: (i) the new scenario-based Risk Management methodology; (ii) the Directors and Officers Civil Liability Insurance, better known as D&O insurance; and (iii) other aspects of sustainability related to climate change, due diligence and human rights, approached from a holistic point of view, including assessment of the risks and opportunities associated therewith.

Likewise, to ensure adequate oversight, the Board and the committees are empowered to seek advice from external advisors whenever deemed necessary.

ⓘ More information on the Company's diversity policies and the role of the Nomination Committee in this area in sections *C. Company management structure C1.5 to C.1.7* of the Annual Corporate Governance Report.

Main roles and responsibilities of governing bodies in relation to the oversight of strategy, risks and opportunities

Definition and oversight of targets and strategy based on risks and opportunities

GOV-1_10;
GOV-1_11;
GOV-1_12;
GOV-1_13;
GOV-1_14

Inditex's Board of Directors undertakes the general function of strategic guidance, with a particular focus on strategic impact issues affecting the business.

For this purpose, the Board of Directors examines the regular reports from the Chair and the CEO outlining a range of financial, operational, business and sales aspects of the Group. In particular, the CEO addresses, among other aspects, matters relating to: (i) snapshot of the current business situation and, in particular, the fulfilment of strategic objectives, (ii) the Management Committee's strategic thinking and main lines of action in this area, (iii) the foremost conclusions and viewpoints gleaned from the quarterly meetings held with investors and analysts, (iv) the evolution of the industry as a whole and of other comparable companies, and (v) the main projects of a more strategic and/or reputational kind (when these do not require express approval by the Board of Directors).

As a cornerstone, the directors and managers of the various brands and subsidiaries are encouraged to appear quarterly to monitor and analyse the performance and outlook of the business in relation to the various commercial concepts and the different markets where the Group operates. The same goes for corporate directors and managers who, together with the CEO, are responsible for establishing the general strategies and policies (for example, concerning Sustainability, People and Innovation) and their related objectives, periodically and whenever they require discussion and/or updating. This gives the Board of Directors a comprehensive and timely overview of business developments and expectations, major risks and related opportunities and targets.

Furthermore, the members of the Sustainability, Remuneration and Nomination committees, including their chairs, also serve on the Audit and Compliance Committee. The overlapping presence of directors on these committees and the report that each committee chair submits to the Board of Directors regarding the main issues discussed at their respective meetings ensure that the most relevant issues on these topics are taken into consideration in the deliberations of the Audit and Compliance Committee and of the Board, allowing for a better identification of the risks and opportunities associated with these matters.

Risk management

The Board of Directors is responsible for overseeing the development and outlook of the business, including the related risks, and is generally in charge of steering the strategy.

One of the main functions of the Audit and Compliance Committee is to support the Board in the oversight and assessment of financial and non-financial risks, such as those arising from the Group's actions pertaining to its social and environmental sustainability practices, or the use of new technologies, such as cybersecurity risks, etc., as well as in monitoring the effectiveness of enterprise risk management systems.

In any event, for an adequate risk control, the Audit and Compliance Committee's agenda is planned annually on the basis of overseeing the most salient risks for the Company, in accordance with the updated performance report, and as identified in the Group's Risk Map.

In this connection, the head of the Enterprise Risk Management department reports regularly to the Committee to outline the critical risks (i.e. those that may affect business performance, included in the Risk Map, and/or those that have undergone significant changes in the annual risk review and that have worsened), and to report on the control mechanisms established for their adequate management and control.

In addition, the head of the Enterprise Risk Management department reports to the Committee whenever there is exposure to a given critical risk, together with the managers and heads of of the Company and/or the relevant control areas.

Oversight functions

The Company also has a number of assurance functions which have their own risk prevention and control models, in connection with cybersecurity risk, compliance risk (including criminal risk), and personal data protection and privacy, as well as those associated with the process of compiling the Group's financial and non-financial information so as to reasonable ensure the accuracy thereof.

- **Compliance:** the Chief Compliance Officer reports periodically to the Audit and Compliance Committee regarding the enforcement of the Codes of Conduct and the findings of the supervision of the Inditex Group's Model of Criminal Risk Prevention and the actions for implementing the Global Compliance Model. More information on the scope of the Compliance function's report to the Committee can be found in section *G1-1. Corporate culture and business conduct*.

- **Cybersecurity:** the CISO reports on matters under their purview to the Audit and Compliance Committee on a half-yearly basis and, when so required, to the Board of Directors.

- **Data Protection and Privacy:** the head of the Data Protection and Privacy department and the Group's Data Protection Officer appear before the Committee to report on, among other aspects, the strategy, data protection and privacy risk management, the main projects and initiatives, the Annual Work Plan, the annual budget and the human and material resources of the function as well as the monitoring of its Privacy Framework.

- **Financial Information and Sustainability Information Control Systems:** within the framework of the supervision of the process of preparing and presenting the financial and sustainability information, the Audit and Compliance Committee periodically receives information concerning the efficacy of those systems from the area head.

Internal Audit function

The Internal Audit Function provides the Board of Directors, the Audit and Compliance Committee and senior management with assurance, advice, knowledge and prospective vision on the suitability and effectiveness of the governance, risk management and control processes for the Inditex Group.

It is part of the organizational structure through its functional dependence on the Audit and Compliance Committee and its hierarchical dependence on the non-executive President of the Board, which makes it possible to exercise its function independently and objectively. The scope of Internal Audit services covers the entire Group.

In the exercise of its functions, Internal Audit coordinates with other second-line functions of the Company, such as the Risk Management or Compliance Departments. It also assists the Audit and Compliance Committee in its work of supervising the external audit services of financial information and external verification of sustainability information, coordinating said services.

The Audit and Compliance Committee oversees the function, including, among others, its authority, its responsibilities, the scope of its services and the adequacy of its human and material resources, approving its budget. It also ensures independence and objectivity in the exercise of its powers. Approves the Annual Internal Audit Plan, ensuring that its activity is focused primarily on the relevant risks of the Group, including reputational risks, and that it is appropriate for the needs of the Company.

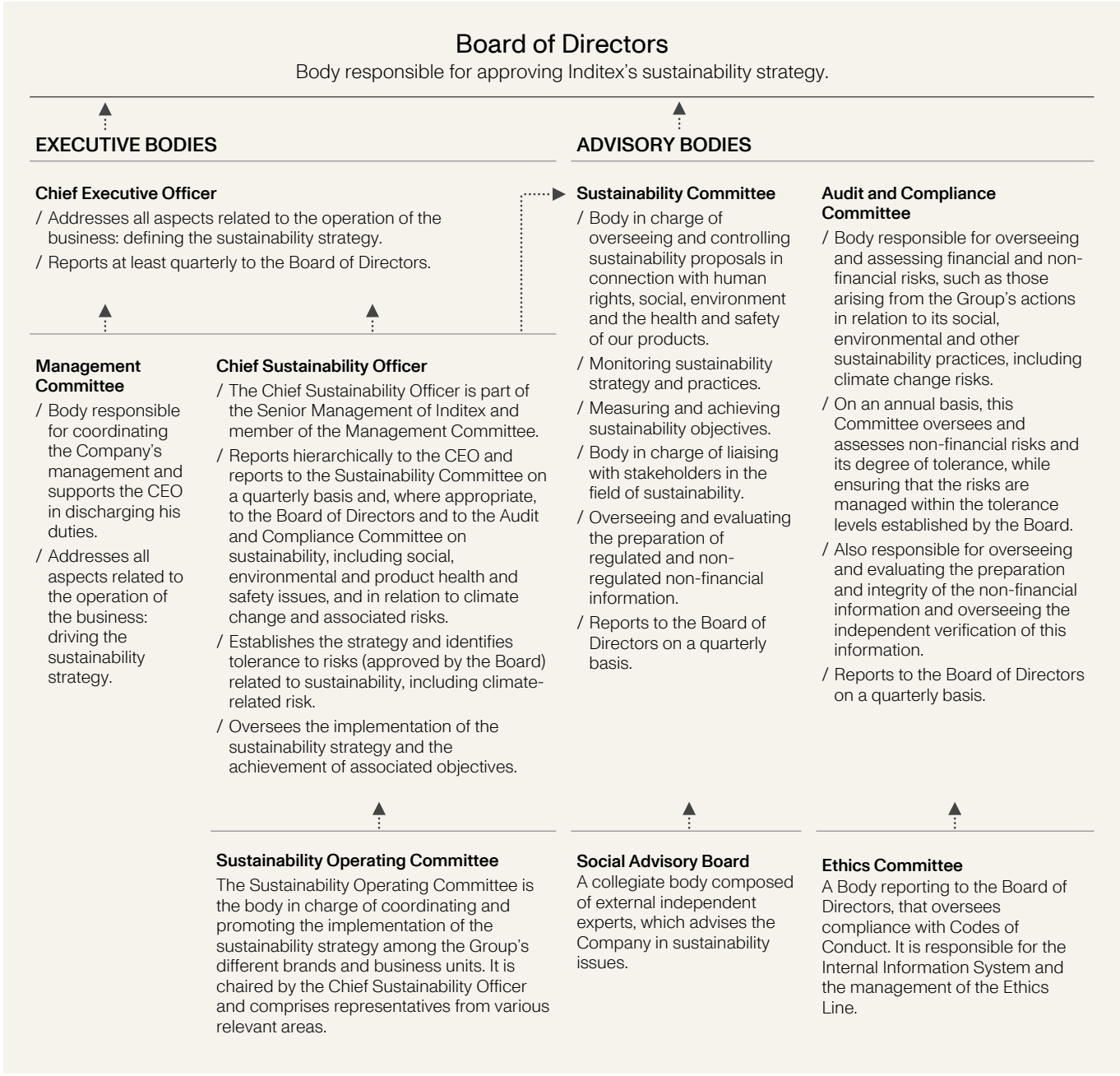
The Chief Internal Audit Officer reports quarterly to the Audit and Compliance Committee about the degree of compliance with the Annual Plan, including possible changes and deviations, incidents and limitations to the scope that may arise in its development, as well as about the work carried out in the different areas of the audit activity and the recommendations issued (with the corresponding action plans, which are monitored). The Audit Committee verifies that senior management takes into account the conclusions and recommendations derived from the reports issued by Internal Audit.

Finally, the Audit and Compliance Committee evaluates the operation of Internal Audit and the performance of its manager at the end of each year.

GOV-2. Information provided to governing bodies and sustainability matters addressed

Sustainability governance

GOV-2_01;
GOV-2_02;
GOV-2_03;
GOV-2_04



The Group's commitment to sustainability is reflected at the highest level of the Company, starting with the most senior governing bodies, with sustainability as a factor integrated in the decision-making process. In this regard, the Board is supported by a number of consultative and executive bodies, represented in the Group's management team, with the involvement, firstly, of the Chief Sustainability Office, who in turn is supported by the Social Advisory Board and the Sustainability Operating Committee.

As an informative and advisory Board committee, the Sustainability Committee is responsible for monitoring our social and environmental sustainability strategy and practices and verifying their compliance with the Sustainability Policy.

The Committee therefore regularly liaises with the CEO and Sustainability management, who define and establish the general sustainability strategy, its targets and the roadmap for achieving it. The Chief Sustainability Officer (CSO) reports, at least quarterly, on the degree of achievement of the strategic targets and the proposals and plans devised to achieve them, in the areas of human rights, social, environmental and product health and safety.

The CSO is also a member of the Inditex Management Committee —which reviews the strategy and business and investment plans in this area too— and chairs the Sustainability Operating Committee —the body in charge of coordinating and promoting the implementation of the sustainability strategy among the various brands and business units— at all times liaising directly with the different corporate and business areas responsible for its execution.

The Sustainability Committee is further tasked with the supervision of the process of preparing regulated and non-regulated sustainability information. With regard to the sustainability information included in the Directors' Report, this oversight is carried out in coordination with the Audit and Compliance Committee, which is responsible for the ultimate oversight and evaluation of the preparation process and the integrity of the sustainability information included in the Directors' Report, ensuring compliance with all legal requirements, and also dealing with the process of independent verification of this information.

Such coordinated action ensures a global view of the effective implementation of policies relative to their respective areas of competency, as well as enhancing transparency by improving the quality of sustainability information made available to the market.

In particular, the Sustainability Committee is responsible for evaluating whether the information included in the mandatory report is consistent with the Company's sustainability policies. As part of the sustainability reporting process, a double materiality assessment is carried out annually to identify the impacts, risks and opportunities that relate to our activity, strategy and business model. The findings of that assessment are reported to the Sustainability Committee, which must then ensure they are taken into account in the aforementioned sustainability reporting.

The result of this double materiality assessment is also taken into account by the Company's management when identifying sustainability risks and opportunities and defining its strategies and action plans. These issues, in turn, shape the agenda of matters addressed by Inditex's corporate bodies and, in particular, by the Board of Directors. In 2024 the Board has tackled the following matters in connection with sustainability, mainly through the reports submitted by the chair of the Sustainability Committee:

/ The approval of the different action plans and roadmap for the compliance with sustainability targets, such as:

- The Fibres Plan, concerning the goal of using lower-impact textile raw materials.
- The Cotton Strategy.
- The Climate Transition Plan, with respect to the net-zero target.

/ The analysis of the supply chain and its clusters

/ Monitoring of the new regulatory framework regarding sustainability reporting and due diligence.

/ The strategy in innovation and, in particular, in sustainability.

Moreover, in 2023 the Board of Directors approved the new sustainability targets presented by the management, which were subsequently announced by the CEO at the 2023 AGM, along with the Group's diversity and inclusion strategy, which is part of the Group's responsible action. These sustainability targets have gradually been added to the variable remuneration components of the Chief Executive Officer and other key positions in the Company.

The main activities carried out by the Board of Directors and the Sustainability and Audit and Compliance Committees in the performance of their respective duties in connection with sustainability and other material topics for the Group in accordance with the double materiality assessment are outlined below.

ⓘ More information on the activities of the Sustainability and Audit and Compliance Committees in section *C2.1* of the Annual Corporate Governance Report.

Activities of the Sustainability Committee:

Monitoring the social and environmental sustainability strategy and practices

- Approval of the Annual Activities Report of the Sustainability Department for 2023 and the annual work plan and budget of that department for 2024.
- Through the reports of the CSO and the CEO, quarterly monitoring of (i) the most relevant milestones and initiatives in these periods, and (ii) the degree of compliance with the sustainability targets in progress.

- Review and acknowledgement of the objectives and main lines of action of the various initiatives featured in the following plans promoted by the Sustainability Department: (i) Climate Transition Plan, (ii) Fibres Plan, and (iii) Cotton Strategy.

- Analysis of other matters, through the reports of the directors and heads of the different Sustainability areas: (i) the Group's supply chain, (ii) the analysis of the Clusters of the Group; (iii) analysis of the carbon footprint calculation methodology, (iv) sustainability innovation strategy and initiatives and (v) legislative updates in connection with due diligence and reporting, and the measures implemented to comply with them.

Oversight of the process of preparing and releasing regulated and non-regulated sustainability information

- Prior favourable report to the 2023 Statement on Non-Financial Information within the scope of its competency (as explained above). This Report was approved by the Board of Directors, also following a favourable report from the Audit and Compliance Committee, with regard to the oversight of the process for preparing this information and the findings of its verification by the external auditors.

- Monitoring of the status of preparedness of the Consolidated Statement of Non-Financial Information and Sustainability Information for 2024 under the new European reporting standards.

- Evaluation of the methodology and results of the double materiality assessment and verification that those results were taken into account in the Consolidated Statement of Non-Financial Information and Sustainability Information for 2024.

Activities of the Audit and Compliance Committee:

Activities in relation to risk oversight and assessment and effectiveness of control systems

- Report by the head of the Enterprise Risk Management department on the work and results of the Risk Map updating, in accordance with a new, scenario-based methodology. The Board of Directors approved the 2025 Risk Map update.

- Analysis on the working of the management systems in place and the conclusions reached, in relation to the risks identified in the Risk Map as critical or relevant. Thus, in 2024 the Audit and Compliance Committee has supervised and monitored the following risks: (i) work-related risks; (ii) risks arising from the geopolitical situation; (iii) third-party risks of the Group and its management model through the corresponding directors' reports; and (iv) risks related to the Group's logistics activity.

Besides, in relation to this risk supervision function, the Committee also carried out the following activities:

/ **Information Security:** approval of the Annual Work Plan and budget for 2024 for the function and, through the CISO reports, a half-yearly analysis of the level of cybersecurity maturity and monitoring of events of interest and incident management (previously analysed in the pertaining meetings of the Information Security Committee).

ⓘ More information on the Group's cybersecurity activity and on the main matters addressed by the Cybersecurity Advisory Committee in section *Additional information. Cybersecurity* of this Report.

/ **Supervision of the Compliance function and internal regulations reporting**: (i) acknowledgement of the periodic reports of the Chief Compliance Officer on the operation of the Global Compliance Model, compliance risk management and the main projects and initiatives (including training and awareness), (ii) approval of the Annual Work Plan for the year 2024, the annual budget and the human and material resources, as well as (iii) the favourable report on certain internal regulations, within its area of competence, prior to their approval by the Board of Directors.

/ **Oversight of the Model of Criminal Risk Prevention:** acknowledgement of the regular reports of the Ethics Committee about the supervision of the Model of Criminal Risk Prevention (i.e. the 2023 annual report and the report for the first half of 2024).

/ **Review of the Ethics Committee´s reports and proceedings:** review and acknowledgement of the Ethics Committee's regular reports on the main activities carried out by in relation to the Ethics Line (i.e. the 2023 annual report and the report for the first half of 2024) and quarterly follow-up of the evolution of the number of cases processed and concerns received through the Ethics Line.

/ **Data Protection and Privacy Report:** through the annual report of the Data Protection and Privacy department and the Group's Data Protection Officer, a monitoring and analysis was carried out on, among other aspects, the strategy, data protection and privacy risk management, the main projects and initiatives, the Annual Work Plan, the annual budget and the human and material resources of the function, as well as the operation of its Privacy Framework.

GOV-3. Integration of sustainability- related performance in incentive schemes

GOV-3_01;
GOV-3_02;
GOV-3_03;
GOV-3_04;
GOV-3_05

Inditex's Directors' Remuneration Policy for 2024, 2025 and 2026, currently in force, was approved at the Annual General Meeting held on 11 July 2023 ('Remuneration Policy') and is effective during the aforementioned years.

Directors' remuneration

The remuneration of directors in their capacity as such, in accordance with applicable best practices, is composed entirely of fixed components. Specifically, the Remuneration Policy establishes the items of annual fixed remuneration that directors may receive in their capacity as such, as well as the relevant amounts thereof, while this Policy is in effect.

Within this limit, which is set by the Annual General Meeting, the Board of Directors determines the manner and timing of payments, based on a proposal from the Remuneration Committee.

ⓘ More information on the principles, foundations and components of the Remuneration Policy, as well as on the remuneration of directors in their capacity as such in sections A and *B of* the Annual Report on Remuneration for 2024.

Remuneration of the Chief Executive Officer for his Senior Management duties

In addition to the remuneration received as a director of the Company, the CEO receives remuneration for the performance of his executive duties.

This remuneration package consists of a fixed component (the amount of which is determined by the Remuneration Policy), a short-term or annual variable remuneration component and a long-term or multi-year variable remuneration component, payable in cash and/or shares.

The Remuneration Policy establishes the possibility of linking both variable components to financial, operational and value creation metrics, and non-financial metrics, such as sustainability indicators. The CEO's variable remuneration, both annual and multi-year, is linked to the fulfilment of certain sustainability targets (environmental, social and corporate governance), consistent with the Group's sustainability strategy, which is a further incentive for the development of that strategy.

/ Short-term or annual variable remuneration

The Board of Directors resolved, at the proposal of the Remuneration Committee, that the CEO´s annual variable remuneration for 2024 would be determined on the basis of certain criteria and, in particular, in relation to progress made in the implementation of Inditex's global sustainability strategy —measured according to the indicators detailed below— in corporate governance and in the implementation of the diversity and compliance programmes, with a total weight of 15%.

The sustainability-related measurement criteria are detailed below:

Target
Progress in the implementation of the strategy towards global sustainability at Inditex:
Performance criteria
(i) Degree of progress in adoption of recycled fibres. (ii) Degree of progress in the supply chain transformation plan (water, energy, waste and chemicals). (iii) Degree of progress in the development of strategic partnerships aimed at the transformation of the industry. (iv) Degree of progress in improving traceability across of our supply chain. (v) Development of additionally mechanisms in the renewable energy infrastructure. (vi) Level of implementation of environmental projects related to the initiative to charge for paper bags and envelopes at stores. (vii) Development of innovation projects in fibres and production processes.

ⓘ More information in the Annual Report on Remuneration.

/ Multi-year or long-term variable remuneration

The Company has various long-term incentive plans in place, consisting of a combination of a multi-year cash bonus and a pledge to deliver shares. The incentive in question may be paid in cash and/or include the release of shares provided that the relevant targets are met. The period for measuring the targets is at least three years.

In line with the Remuneration Policy, the weight of sustainability metrics to which multi-year remuneration is linked in the long-term incentive plans currently in force is 25%, which is above the 20% market median.

The second cycle (2022-2025) of the **2021-2025 Long-Term Incentive Plan** ended on 31 January 2025. In 2024, both cycles of the **2023-2027 Long-Term Incentive Plan** approved by the Annual General Meeting on 11 July 2023 were also in force.

This Plan has a total duration of 4 years and is structured into 2 mutually independent time cycles: (i) the Plan's first cycle runs from 1 February 2023 to 31 January 2026, and (ii) the second cycle spans the period from 1 February 2024 to 31 January 2027.

The sustainability-related measurement criteria, which may account for up to 25% of the total long-term variable remuneration for each of the plans, are detailed below:

Target		
Sustainability index (comprising four indicators):		
Plan 2021-2025 Performance Criteria	**Plan 2023-2027 Performance Criteria**	
Cycle II (2022-2025)	**Cycle I (2023-2026)**	**Cycle II (2024-2027)**
Fibre consumption: measured as the reduction in percentage points of the weight of conventional fibres in total fibre consumption (in t), for the four fibres subject to a public commitment (cotton, polyester, man-made cellulosic fibres and linen).	Consumption of textile raw materials with lower impact (referred to as 'preferred'): measured as the percentage of preferred textile raw materials (organic, in-conversion, regenerative, recycled, certified as European linen, Green viscose in the Hot Button Report by Canopy and EU BAT compliant or 'Next Generation') in the FY2025 winter campaign on the total purchase of the main fibres (cotton, polyester, linen, viscose, modal and lyocell) in said campaign.	Consumption of textile raw materials with a lower impact (referred to as 'preferred'): measured as the percentage of preferred textile raw materials in the FY2026 winter campaign on the total purchase of the raw materials in that campaign.
Water consumption: measured as the percentage reduction of water consumption (litre/kg) in the supply chain.	Water consumption: measured as the percentage reduction in water consumption (litre/kg) in the supply chain between the cycle start date (1 February 2023) and the end date of the cycle (31 January 2026).	Biodiversity improvement: measured as the increase in the number of hectares that are protected, restored, regenerated or under other forms of biodiversity improvement management between the start date of the second cycle (1 February 2024) and the end date (31 January 2027).
Decarbonisation: measured as the percentage reduction in the volume of scope 3 Greenhouse Gas emissions, in the category 'purchased goods and services'.	Decarbonisation: measured in terms of percentage reduction of the volume of scope 3 Greenhouse Gas emissions, in the 'purchased goods and services' category, between the start date of the cycle (1 February 2023) and end date of the cycle (31 January 2026).	Decarbonisation: measured as the percentage reduction in the volume of Greenhouse Gas emissions (scope 3), in the category 'purchased goods and services', between the start date of the second cycle (1 February 2024) and the date of its completion (31 January 2027).
Social: measured as the percentage of suppliers of Inditex products that are classified with a social ranking A and B.	Social: total number of workers who are part of the programmes of the priority impact areas of social dialogue, living wages, health, respect and resilience of the Workers at the Centre Strategy in the period between 1 February 2023 to 31 January 2026 (cumulative data for the three financial years: FY2023, FY2024 and FY2025).	Implementation of the Environmental Improvement Programme for Supply Chain Transformation: measured as the percentage of facilities in which the plan has been implemented over the total facilities targeted by the plan (cumulative data for the three financial years: FY2024, FY2025 and FY2026).

Considering the degree of achievement of the various targets to which the 2024 variable remuneration of the Chief Executive Officer is linked, **the weight of sustainability targets over the Chief Executive Officer's total variable remuneration was approximately 20% and 72% over fixed remuneration.**

ⓘ More detailed information on the targets, measurement criteria and the scales of achievement for each of the sustainability objectives linked to the variable remuneration of the Chief Executive Officer in sections A and B of the *Annual Report on Remuneration.*

Compensation paid to other members of Senior Management

There is a clear alignment between the CEO's and the Senior Management's remuneration structures, coinciding both in their principles and remuneration components and in the design of the incentives, which are broadly consistent throughout the organisation, as well as in the mechanics of the pay review process.

Accordingly, **reaching sustainability targets is also a component of the Senior Management's variable remuneration, as well as a component of other key personnel variable remuneration**, which reinforces the commitment of the Company's people to sustainability.

GOV-3_06

Finally, below is a breakdown of the competencies of the various governing bodies in connection with the approval of the incentives system:

- **Annual General Meeting:** (i) approval of the Directors' Remuneration Policy at least every three years; (ii) determination of the maximum amount of annual remuneration to be paid to all directors in their capacity as such; and (iii) separate approval of incentive plans involving the delivery of shares or remuneration linked to the share price.
- **Board of Directors and Remuneration Committee:** the Remuneration Committee carries out an annual, global assessment of the following proposals: (i) the specific metrics and targets to which the variable annual remuneration of the CEO is linked at the start of every year and the review of their achievement at year end, and (ii) the specific metrics, targets and scales of achievement of each long-term variable remuneration cycle, and the review of their achievement and the associated incentives at the end of each cycle.

Furthermore, the Sustainability Committee previously assesses proposals on sustainability metrics and targets to which variable remuneration —both annual and multi-year— are subject, and their degree of achievement and related incentives, referring them to the Remuneration Committee.

This assessment of the sustainability targets and the degree of achievement thereof to which variable remuneration is linked, is carried out on the basis of the data and results provided by the Sustainability Department and reviewed by external and in-house auditors. In any event, the Sustainability Committee carries out quarterly monitoring of the targets and, at the end of the cycle, assesses their global achievement.

Based on this, the Remuneration Committee draws up a proposal for the variable remuneration, which is submitted to the Board of Directors for approval.

ⓘ More information in the *Annual Report on Remuneration.*

GOV-4. Statement on due diligence

GOV-4_01

Our due diligence process allows us to identify and prioritise the potential sustainability-related negative impacts (including human rights and environmental aspects) throughout the value chain, in order to incorporate the findings into our activities, designing tools to prevent and mitigate those impacts, enriching and continuously complement these tools. This process is based on the United Nations Guiding Principles on Business and Human Rights and on the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

In this regard, due diligence is the second cornerstone of Inditex's human rights strategy (the Human Rights Policy is the first and the grievance mechanisms the third).

Due to its importance, nature and scale, our supply chain is a priority area of the value chain in terms of sustainability. Thus, comprehensive and effective due diligence in a global supply chain entails robust policies, tools and practices designed to identify, prioritise and mitigate the impacts on people and the environment. Inditex has developed a sustainable management of its supply chain with a compliance programme that includes audits (both social and environmental), corrective action plans and training, among other measures. This is accompanied by a social strategy (Workers at the Centre) grounded on identifying and prioritising impacts on human rights.

Furthermore, grievance mechanisms are key elements to improving the due diligence process, as their information facilitates the identification of potential negative impacts, and allows the Company to react and mitigate the risk.

ⓘ More information in sections *G1-1. Corporate culture and business conduct* , *S2. Workers in the value chain* and *G1-2. Management of relationships with suppliers* of this Report.

CORE ELEMENTS OF DUE DILIGENCE	LOCATION IN THE REPORT
Embedding due diligence in governance, strategy and business model	ESRS 2. GOV-1
Identifying and assessing adverse impacts	ESRS 2. IROs
Engaging with affected stakeholders in all key steps of the due diligence	ESRS S1. S1-2
	ESRS S2. S2-2
	ESRS S3. S3-2
	ESRS S4. S4-2
Taking actions to address those adverse impacts; and Tracking the effectiveness of these efforts and communicating	ESRS S1. S1-3
	ESRS S2. S2-3
	ESRS S3. S3-3
	ESRS S4. S4-3
	ESRS E1. E1-3
	ESRS E2. E2-2
	ESRS E3. E3-2
	ESRS E4. E4-3
	ESRS E5. E5-2
	ESRS G1. G1-3

GOV-5. Risk management and internal controls over sustainability reporting

Internal control system on sustainability reporting

GOV-5_01;
GOV-5_02

The Group continues to evolve its Internal Control System on Sustainability Reporting (ICSR) to ensure the quality, accuracy and transparency of the information included in this Report, in compliance with the provisions of Act 11/2018 and considering the new CSRD regulatory framework.

This system was developed considering the synergies between the methodologies of our control models, such as the Internal Control over Financial Reporting System (ICFR). Both systems have been developed in line with the COSO (Committee of Sponsoring Organizations of the Treadway Commission) international standard for internal control. Furthermore, in an exercise of continuous improvement, the ICSR is equipped with more comprehensive controls, to match new regulatory frameworks.

The ICSR covers the control environment, the risk assessment related to the drafting of the report, the specific control activities implemented to mitigate these risks, the activities for supervising the main indicators included in the report and the information and communication to improve the management of the system.

Among the bodies responsible for the existence of the Internal Control System on Sustainability Reporting (ICSR), the Board of Directors is the highest decision-making, supervisory and control body of the Group, including the ultimate responsibility for the existence and maintenance of an adequate ICSR.

ⓘ More information in section *GOV-1. The role of the governing bodies* of this Report.

GOV-5_03;
GOV-5_04

We consider the risks related to the reporting of Sustainability Information to be those understood as the absence or insufficiency of stable and defined processes, which can lead to errors or incompleteness in the presentation of information, and therefore to the reporting of unreliable information.

To achieve this, we use tools and systems that allow us to automatically analyse compliance with the applicable regulations, also introducing a layer of governance and automated workflows. Furthermore, we have manuals for the creation of the indicators, which include the construction methodology, the measurement criteria and the information systems involved.

In this regard, a reporting model was developed for managing and reporting indicators (both qualitative and quantitative), defining different assessment attributes for each indicator that allow reports to be automatically generated, facilitating compliance control.

Likewise, consistency controls are in place to check for variations in the indicators with respect to previous years. Completeness checks have also been introduced as an additional control mechanism.

Parallel to this, for the capture, management and presentation of data from external sources, we have management systems that facilitate the compilation of this data, such as our supplier management systems. Lastly, the information systems involved in the process include mechanisms for controlled access, completeness, change management, continuity and information security.

GOV-5_05

Every year, the ICSR area carries out an assessment of the execution of the controls, identifying any areas for improvement, and, together with the heads of the areas concerned, carry out maintenance and updating of the model. Based on this assessment, the ICSR area compiles a report that is submitted to the management of the areas involved and to the Internal Audit department.

Likewise, the Internal Audit department may carry out, as part of its Annual Audit Plan, operational reviews of the governance, risk management and internal control processes linked to the preparation of the Sustainability Information. In addition, the Consolidated Statement of Non-Financial Information and Sustainability Information is subject to verification by the Company's external auditor.

SBM. Strategy

SBM-1. Strategy, business model and value chain

About Inditex

SBM-1_01

Industria de Diseño Textil, S.A., is the parent company of the Inditex Group, which is listed on all four Spanish stock exchanges. Details of the composition of the Inditex Group as of 31 January 2025 are provided in *Annex I* of the Consolidated Annual Accounts.

Our main activity —the distribution and sale of fashion and household products— is aimed at offering our customers an inspiring, quality and responsibly produced range of products. This activity is carried out through various brands or retail concepts: Zara, Pull&Bear, Massimo Dutti, Bershka, Stradivarius, Oysho and Zara Home. Each concept operates through an online and store model that is managed directly by companies over which Inditex exercises control through the ownership of all or the majority of the share capital and of the voting rights, except in certain markets where, for several reasons, the business is carried out through franchises.

On the other hand, the Group holds joint ownership interests in the entities making up the Tempe Group. The Group does not have any other significant non-controlling interests.

SBM-1_02

Inditex is focused on producing global fashion aimed at society as a whole, although each of our brands offers a different commercial range, thereby enabling us to address the various market trends and meet our customers' wide-ranging needs. The Group has a presence in 214 markets, with a relatively low market share in most of them and in a highly fragmented sector, meaning that it has strong growth opportunities.

Retail concepts

Zara



Zara is a driver of change in the fashion world, with trends and inspiration within everyone's reach. It's goal is to provide everyone with the fashion they deserve: always up to date, inspiring and responsibly made.

Based on continuous customer feedback, Zara's design team responds to their changing needs, catering for the latest trends and offering new proposals at the right place and time, while weaving sustainability into its processes.

Pull&Bear



Pull&Bear was launched in 1991 with the aim of dressing young people who are committed to their environment, who reject stereotypes and who are part of a community.

The brand takes the latest international trends, combines them with the influences that make up streetstyle and fashion clubs, and reinterprets them, transforming them into comfortable and easy-to-wear garments.

Pull&Bear evolves with its customers, and is always alert for new technologies and the latest trends in art and music,

Massimo Dutti



Massimo Dutti offers a refined vision of natural elegance in today's world, with a sophisticated fashion proposal that responds to the demands of an urban and independent individual for whom stylishness is the reflection of a quality life.

Combining graceful tailoring with the comfortable and timeless style of more informal and relaxed garments, Massimo Dutti embodies a modern, comfortable and yet sophisticated interpretation of natural distinction.

Bershka



Bershka is at home among music, technology and the social community. It offers a creative and immersive experience that connects the coolest city youth with emerging trends.

The brand has three lines —Bershka Women and Men, and BSK Teen— covering different styles and combining everyday garments with special, trendy proposals. The general collection is enhanced by customisation options, limited editions and collaborations with major partners.

Stradivarius



Stradivarius understands fashion as a constantly evolving form of expression, capable of inspiring and reinventing itself. Just like people do, its style changes and transforms. That's why collections are designed with versatility and authenticity in mind, so that, with its garments, each customer can find the freedom to be whoever they want to be, regardless of the occasion.

Stradivarius started out as a family-run women's fashion business and joined Inditex in 1999. Our design teams, made up of passionate professionals who are always open to change, render current trends into unique styles with the aim of inspiring and connecting with each customer.

Oysho



Oysho is a sports and leisure brand that combines innovation, performance and quality. It offers a broad range of technical collections designed to deliver maximum performance and comfort during sports activities.

Oysho's leisurewear collections offer outstanding functionality and versatility, adapting perfectly to every situation and need. With a focus on sport and an active lifestyle, the brand continues to evolve, driving innovation and honing its designs.

Zara Home



Zara Home's collections combine timeless ambiences with refinement. They include everything you need to decorate the various rooms in a house: bedroom, kitchen, dining room, living room and bathroom; as well as a special selection of children's products and a complete collection of home fragrances.

As the brand evolves, Zara Home aspires to continue accompanying customers through a quality offering, developing inspiring proposals for their lifestyle and being a part of all the moments of their life.

SBM-1_03

At the end of the financial year 2024, our Group comprises a team of 162,083 people employed in 56 markets and representing a total of 170 nationalities (161,281 people, 57 markets and 174 nationalities in 2023). The breakdown by geography of our people is as follows:

Distribution by geography

	2024	2023
	Number of employees	Number of employees
Americas	18,743	19,963
Asia and rest of the world	14,139	15,526
Spain	49,915	47,761
Europe (ex-Spain)	79,286	78,031
Total	**162,083**	**161,281**

ⓘ More information on how we calculated employee figures in the *Methodological Annex* of this Report.

SBM-1_05

At Inditex we undertake to market quality products that respect the environment and the health and safety of our customers. Our range of products is global and adapted to cultural criteria, demand and the legislation in force in each market. Accordingly, we do not market products that are prohibited in the markets where we operate.

SBM-1_06;
SBM-1_07;
SBM-1_24

Our main sphere of operation is the retail sale of Textiles, Accessories, Footwear and Jewellery[3]. In 2024 our activity generated revenue amounting to 38,632 million euros.

ⓘ More information in *Note 4. Net Sales* to the Consolidated Annual Accounts of this Report.

SBM-1_08;
SBM-1_09;
SBM-1_15;
SBM-1_17;
SBM-1_19

It is also important to note that the Group does not significantly operate in other ESRS sectors, in particular fossil fuel sectors (coal, oil and gas), chemical manufacturing, weapons manufacturing or tobacco production. In other words, it is not related to impacts (material or otherwise) or risks in other sectors significant for the Group.

Business model

SBM-1_25

Our business model covers all the stages, including the design of our products and their sale in our stores and online platforms. This business model is based on **four drivers,** with the aim of generating maximum value for our customers, investors and other stakeholders:

- A **fashion proposal** built on creativity, innovation, quality and, above all, on permanently listening to the needs and wishes of our customers.
- An **increasingly engaging shopping experience.**
- Our commitment to **sustainability and responsibility.**
- **Our people's** talent.

A model tailored to demand

Our retail concepts excel in their capacity to adapt and respond to any change in the market or the irruption of a new trend, thanks to our fine-tuned production processes, with short runs that are fully adapted to demand. This also allows us to maintain a tight inventory.

So as to guarantee an agile and effective response to this demand, a significant portion of our garments are manufactured in proximity markets near our headquarters, such as Spain, Portugal, Morocco and Türkiye. Furthermore, the integration of the inventory of our physical stores and online platforms allows our customers to access all our products regardless of where they shop, maximising the opportunity to sell the units produced.

[3] ESRS sector, according to the draft pending publication via Delegated Act European Sustainability Reporting Standards – SEC 1 Sector Classification and General Requirements – Exposure Draft.

This **flexible business model** helps us to meticulously manage clothing inventories to **avoid surpluses,** which in 2023[4] represented **0.67%** of total articles sold.

SBM-1_26

Main inputs of our business model

Our fashion proposal requires the commitment of all those involved throughout our value chain —which is described later in this chapter— from sourcing to distribution and sales.

/ **Our teams:** this is one of our most significant inputs. Our talent recruitment and retention strategy allows us to obtain the necessary human resources to carry out our activity, while at the same time taking care of our people's working conditions and creating diverse and inclusive work environments in which they can fulfil their potential.

/ **Raw materials:** this is the key input for manufacturing our products, and includes cotton, man-made cellulosic fibres, polyester and linen, among others. Our manufacturers and suppliers avail themselves of these raw materials in accordance with our instructions and with our Fibres Plan. The Inditex Group does not currently carry out direct raw materials purchases.

/ **Water and energy:** in addition to raw materials, they are the main resources used in the manufacturing processes. In particular, these consumptions are higher in the factories of our supply chain that use wet processes, i.e. dyeing, washing, finishing and printing, among others.

/ **Suppliers and factories of the supply chain:** they are also a fundamental part of the operation of our business. That is why we strive to maintain a relationship of mutual trust and support.

ⓘ More information in sections *S1. Own workforce*, *G1-2. Management of relationships with suppliers*, *S2. Workers in the value chain*, *E1. Climate change*, *E2. Pollution*, *E3. Water and marine resources* and *E5. Resource use and circular economy* of this Report.

SBM-1_27

Main outputs of our business model

Through our business model we want to generate the greatest possible positive impact for our stakeholders.

/ **Customers:** our flexible fashion proposal and our means of analysing their preferences allow us to quickly address their needs. We also aim to continuously improve the customer experience.

/ **Our teams:** we have a Code of Conduct that establishes the Group's commitments to creating work environments that promote their well-being and development.

/ **Suppliers and factories of the supply chain:** the ultimate aim of our Workers at the Centre 2023-2025 strategy is to ensure well-being of the workers in the supply chain and respect for their human rights.

/ **Society:** we work with various stakeholders to promote the sustainable development of the communities where we operate and of society as a whole.

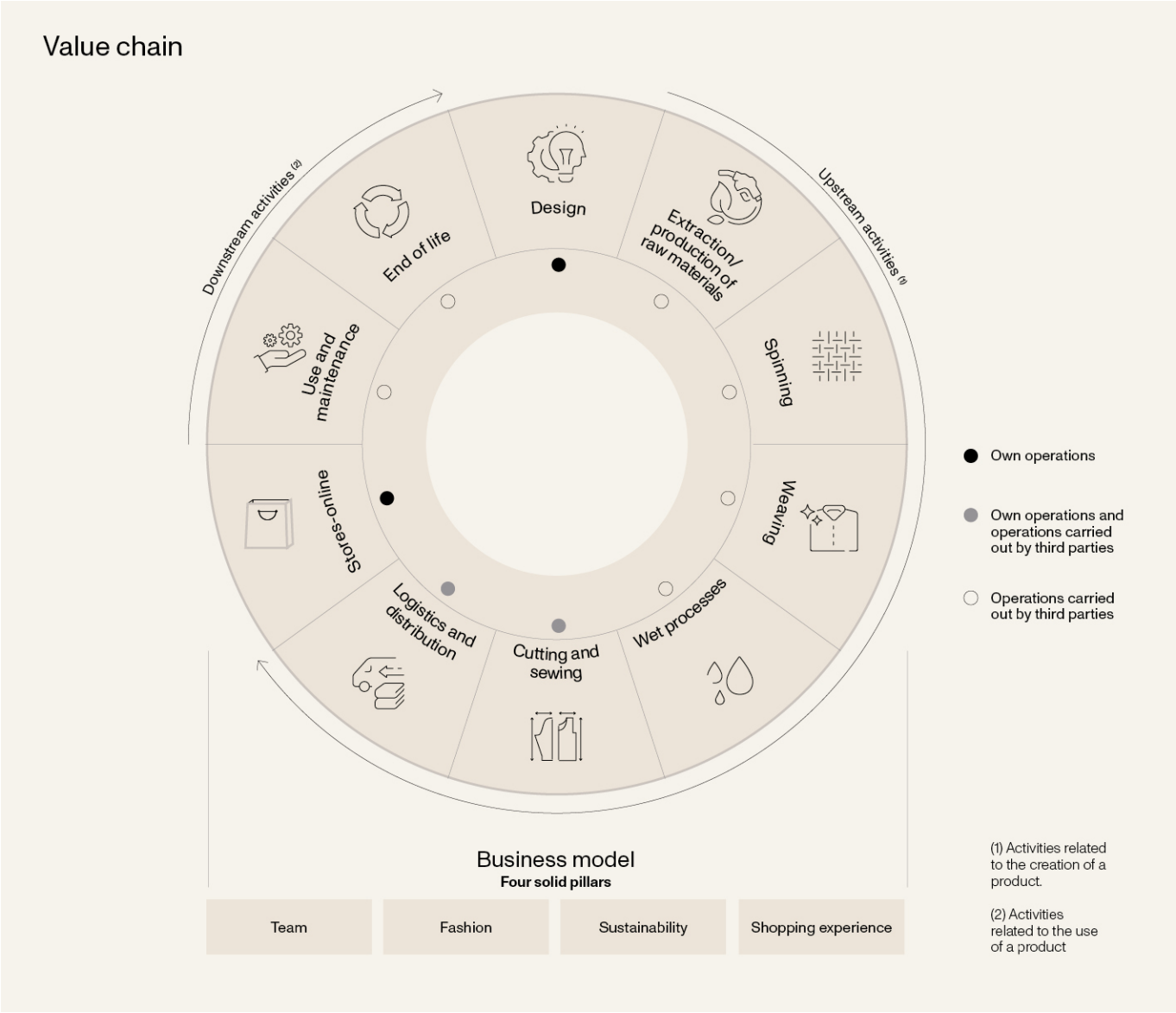
/ **Shareholders:** we implement a policy of transparent and fluid communication. Our shareholder remuneration policy aims to offer an attractive, predictable and sustainable dividend over time.

/ **Environment:** we are committed to carrying out our operations in a more efficient and circular way —for example, by consuming renewable energy, reducing water consumption or using lower-impact fibres in our garments— easing the pressure on resources.

ⓘ More information in sections *S1. Own workforce*, *S2. Workers in the value chain*, *S3. Affected communities*, *S4. Consumers and end-users*, *E1. Climate change*, *E2. Pollution*, *E3. Water and marine resources*, *E4. Biodiversity and ecosystems* and *E5. Resource use and circular economy* of this Report.

[4] Surplus figures are shown for 2023 as the 2024 winter campaign is ongoing in stores at the time of writing this Report, and therefore the surplus inventory has not yet been fully processed.

Our value chain



SBM-1_25; SBM-1_28

The key stages of our value chain are as follows:

/ **Upstream activities:** primarily the design, sourcing of raw materials, manufacturing of our products, logistics and distribution.

/ **Downstream activities:** sales in physical stores and online platforms; and the use and end of life of our products.

Furthermore, these are divided into:

/ **Own operations:** mainly comprising the design and sale phases —via physical and online stores, as well as other ancillary activities carried out in our stores, logistics centres, own factories and our headquarters (where in particular we carry out transversal support activities, such as those related to administration, sustainability, people management, etc.).

/ **Operations conducted by third parties:** raw materials sourcing and product manufacturing; logistics and transport; product use and end of life initiatives.

In the chapter on the materiality assessment, we identified and described those impacts, risks and opportunities that affect both our own operations and our value chain, specifically indicating where the impact is for each one.

Upstream activities

Design:	More than 700 designers; a key factor in the business model.	
	A focus on lower-impact materials and processes.	
	Innovation in alternative raw materials.	
Raw Materials Extraction/Production:	Main categories of fibres: natural (cotton, linen or wool, among others), man-made (cellulosic fibres like viscose or modal, among others) and synthetic (polyester, polyamide and acrylic, among others). The raw material most widely used by the Group is cotton.	
	Raw materials are extracted or produced by third parties independent of the Group.	
Manufacturing:	Non-exclusive suppliers and manufacturers not owned by the Grup[1] organised into 10 clusters in Spain, Portugal, Morocco, Türkiye, India, Pakistan, Bangladesh, China, Cambodia and Vietnam.	
	Process stages:	**Spinning:** production of threads and yarns from the raw materials obtained in the supply stage.
		Weaving: production of fabric from threads and yarns.
		Wet processes: dyeing, washing and printing, among others.
		Cutting and sewing: proximity to headquarters in Spain to boost flexibility and enhance control.
	All these facilities together make up what we call our supply chain. It comprises 6,615 factories that include all stages of our supply chain in 50 markets.	
Logistics and Distribution:	Logistical operations carried out directly by the Group or by third parties. Transport and distribution by independent third parties not owned by the Group.	
	Cutting-edge technologies: RFID and Integrated Stock Control System (SINT).	
	Focus on sustainability: efficiency in transportation, distribution and other logistical operations. Reverse logistics efficiency.	

[1] The only exception are the factories owned by the Group and located in the proximity of the Inditex corporate headquarters in Arteixo (A Coruña), which primarily carry out support duties in production completion processes for certain products.

Downstream *a*ctivities

Stores and Online:	Integration of our physical stores and online platforms into a single sales environment.
	Customer experience: avant-garde stores, advanced technology, innovative proposals.
Use and Maintenance:	Initiatives to extend product life cycles: Zara Pre-Owned: garment repair and care guide.
End of Life:	Circular economy: recycling and reuse of materials, collection programmes and second life for garments.
	Operations carried out by third parties.

Sustainability strategy

We have a sustainability strategy with which, in addition to contributing to the transformation of our business and of the textile industry, we aim to address the demands of civil society, our customers and our people, while meeting the requirements of our investors and the increasingly regulatory framework on sustainability.

Furthermore, we integrate sustainability —one of the drivers of our business model— into all processes and decisions throughout our value chain. To achieve this, we implement actions that foster a culture of sustainability. In 2024, more than 17,000 members of our staff received training in this connection. We also have our Changemakers programme, a community that collects proposals and ideas about sustainability from our people and customers in stores.

In 2024, Inditex's sustainability team comprises 287 people, along with 7,867 external partners dedicated to making progress on our sustainability goals and strategies.

SBM-1_23

The impact: focus of our sustainability strategy

To improve our impact, we continuously analyse the repercussions of our activity throughout the value chain. In this process we work with environmental specialists, academic institutions, international organisations, trade unions and NGOs.

What we want to help protect through our strategy



/ Air / Water / Ecosystems / Land / People

Pillars

/ Circular processes and services
/ Lower-impact fibres
/ Lower-impact production
/ People wellbeing
/ Reduction of emissions
/ Reduction of use of virgin resources
/ Reduction of waste
/ Contribution to biodiversity

ⓘ More information in section *IROs. Disclosures on the materiality assessment process* of this Report.

Levers of change for our strategy



Climate Transition Plan

It enshrines our commitment and action lines to tackle the climate challenge, nurturing the precepts of the circular economy and energy efficiency.

ⓘ More information in section *E1-1. Transition plan for climate change* of this Report.



Supply Chain Transformation Plan

It focuses on boosting our suppliers' and manufacturers' performance to achieve our sustainability targets.

Our Environmental Transformation Plan promotes the reduction of water and energy consumption while improving the management of chemicals, waste and discharge quality at our suppliers' and manufacturers' facilities.

ⓘ More information in section *E1-3. Actions in relation to climate change* of this Report.

On the social front, we have our Workers at the Centre strategy which has five Priority Impact Areas: Social dialogue, Living wages, Respect, Health and Resilience.

ⓘ More information in section *S2-4. Actions related to value chain workers* of this Report.



Fibres Plan

It aims to cement our commitment and ensure that 100% of our garments are made from lower-impact textile fibres by 2030.
We estimate that, by then, about 40% of the fibres we use will be recycled, about 25% will come from organic or regenerative farming, about another 25% will be innovative fibres, which do not yet exist on an industrial scale, and the remaining 10% will be other lower-impact fibres in keeping with benchmarking organisations' indicators.

ⓘ More information in section *E5-2. Actions related to resource use and the circular economy* of this Report.

SBM-1_21;
SBM-1_22

Our goals

Roadmap 2040

2025	2030	2040
/ Obtain 100% of our linen and polyester from preferred or lower-impact sources. ⓘ E5	/ Reduce our emissions a 53%, including our own operations and value chain. ⓘ E1	/ Achieve net-zero emissions, reducing at least 90% of our carbon footprint with respect to 2018. ⓘ E1
/ Reduce water consumption throughout the supply chain by 25%. ⓘ E3	/ Use only textile fibres that have a lower impact. ⓘ E5	
/ Help 10 million people through our corporate community investment programme. ⓘ S3	/ 5 million hectares protected, restores or regenerated, or under other forms of management for biodiversity improvement. ⓘ E4	
/ Reach 3 million people in the supply chain through the Workers at the Centre strategy (fostering progress in the areas of social dialogue, living wages, health, respect and resilience). ⓘ S2		
/ Provide circularity services such as Zara Pre-Owned in key markets. ⓘ E5		

Although our objectives are global and apply to all our product lines, the scopes and specifics of each of them are described in the relevant sections of the table above. It should be noted that our targets related to the consumption of fibres apply only to the fibres referred to in the target statement itself. Meanwhile, our circularity services target does not apply to all the markets where we operate, but only to those considered key.

Furthermore, we believe that the transformation of the sector must be based on a collaborative approach and a commitment to innovation. Hence the importance, for example, of our Sustainability Innovation Hub, through which we support innovation in sustainability, contributing expertise, capital and commitment to explore more responsible materials and processes.

Collaboration is another key to this transformation. Examples of our main collaborations are with entities such as the United Nations Global Compact, the International Labour Organization, UNI Global Union, IndustriALL Global Union, The Fashion Pact, International Apparel Federation, Ellen MacArthur Foundation and Zero Discharge of Hazardous Chemicals.

Human rights strategy

We approach respect for human rights from a **transversal** perspective, weaving it into our everyday processes, decisions and relationships. We have a human rights strategy aligned with the UN Guiding Principles on Business and Human Rights, which pervades all Group operations and articulates our alignment with best practices throughout the value chain.

Pillars of our human rights strategy

Human Rights Policy

Approved in December 2016 and modified by the Board of Directors in February 2024.

It applies to the entire Group.

Due diligence

/ Identifying potential impacts arising from operations and relationships with third parties.

/ Prioritising impacts.

/ Integration of the results in processes.

Grievance mechanisms

Underpin the identification of potential impacts and help strengthen aspects of the due diligence process.

SBM-2. Interests and views of stakeholders

SBM-2_01

Our stakeholders are entities or groups that are related to Inditex —both throughout our value chain and in the communities in which we carry out our activity— and which have the capacity to influence our Company with their decisions and opinions. As detailed in our Sustainability Policy, our relationship with them is based on **transparency**, which helps us to establish a bond of trust with them, and **permanent dialogue**, which allows us to respond to their demands and needs.

To make these principles a reality, we use strategies, goals and channels of communication and dialogue that are constantly being updated. Moreover, we have policies that define the principles of the relationship with each stakeholder group, such as our Code of Conduct, our Code of Conduct for Manufacturers and Suppliers or our Human Rights Policy, adjunct to our Sustainability Stakeholder Relations Policy.

ⓘ More information in section *MDR-P. Policies* of this Report.

SBM-2_05

Our work with stakeholders keeps us aware of the issues and trends that are most relevant to them so that we can respond to their needs more effectively, integrating their views into our strategies.

Furthermore, collaboration with all relevant actors is essential to effect the transformation of the textile sector that our sustainability targets pursue.

SBM-2_02;
SBM-2_03

We thus identify and group our stakeholders according to their link to our business model.

Inditex's main stakeholders	Related standard
Our teams Any person who works at Inditex, including our people and other staff. • *Staff at our stores, offices, logistics centres and our own factories and union representatives*	ⓘ S1
Customers Every person who purchases any product sold by the various brands of the Inditex Group. • *Customers and potential customers of physical and online stores*	ⓘ S4
Suppliers Companies that are part of Inditex supply chain and their respective workers. • *Direct suppliers, manufacturers and workers in the supply chain; trade unions; employers associations and international organisations*	ⓘ G1
Community All those persons or entities that form part of the environment in which Inditex carries out its activity. • *NGOs, governments and public authorities, academic institutions, civil society and the media*	ⓘ S3
Environment Set of natural elements present in the environment in which Inditex develops its business model. • *Environmental organisations, governments and public authorities*	ⓘ E1, E2, E3, E4, E5
Shareholders Any person or entity who owns shares in the Inditex Group. • *Institutional and private investors*	ⓘ Consolidated Directors' Report

SBM-2_04

Our relationship with these groups is organised in the following stages:

/ Identification of all the pertinent topics, issues and trends and all the stakeholders that may be related thereto, throughout the value chain and in the environment in which we operate.

/ Classification and prioritisation of stakeholders based on our business model and value chain.

/ Definition of a strategy for each group of stakeholders, establishing concrete objectives, commitments and dialogue tools.

Among these specific tools, which are detailed throughout the Report, are our **alliances and partnerships** with governments, trade unions, academic institutions, local and international organisations and representatives of civil society. In this regard, it is worth highlighting our agreements with trade union federations UNI Global Union and IndustriALL, with the aim of promoting participation, decent work and labour rights for our people and for supply chain workers, respectively. It is also relevant our framework agreement with the International Apparel Federation in order to promote a transformation in the clothing industry and supply chains, laying the foundations for the implementation of projects that seek to improve working conditions, protect the environment, move towards circularity and promote transparency and traceability in supply chains.

We also have transversal communication tools, such as the Sustainability Committee, the Social Advisory Board, our corporate website, this Report and the materiality assessment itself.

SBM-2_06
SBM-2_07

One of the keys to developing our strategy is to actively listen to and work with our stakeholders. This dialogue and constant engagement informs our decisions, allowing us to permanently update our strategy, which factors in the needs and expectations of our stakeholders.

In addition, every year we conduct a materiality assessment in which our stakeholders play a key role. The findings of this assessment, coupled with the continuous dialogue and collaboration between our teams and our stakeholders, tell us what they need and expect from our Company and the potential impacts, risks and opportunities (IROs) of our business model and value chain.

ⓘ More information in section *IROs. Disclosures on the materiality assessment process* of this Report.

This serves as a very valuable guide that helps us to define priorities and develop the policies and strategies that underpin the Company's principles of action and whose level of ambition is reflected in our targets. To achieve these targets, we have implemented a range of action plans, projects and initiatives that are detailed throughout this Report.

Interaction with our stakeholders is also pivotal to ensure the effectiveness and keep our due diligence processes up to date.

SBM-2_08;
SBM-2_09;
SBM-2_10;
SBM-2_11

With that in mind, there have been no significant changes in our strategy or business model over the course of this financial year.

Governance and stakeholder engagement

SBM-2_12

At Inditex we have been fostering dialogue with our stakeholders on sustainability for decades. For example, in 2002 we set up our **Social Advisory Board**, an advisory body composed of independent external individuals which, among other tasks, is responsible for establishing and institutionalising dialogue with key partners from civil society.

Another key tool that helps us nurture collaboration with and commitment to our stakeholders is our **Sustainability Committee**, set up in 2019. In particular, it is in charge of overseeing and evaluating, both the strategy of communication and relations with the various stakeholders, as well as the procedures and channels of communication in place at Inditex to guarantee proper and seamless communication with them.

The Committee liaises with the Social Advisory Board and is also apprised of the results of the annual materiality assessment, which identifies our sustainability impacts, risks and opportunities.

ⓘ More information in section *GOV-2. Information provided to governing bodies and sustainability matters addressed* in this Report.

Notably, in 2024 we approved our Sustainability Stakeholder Relations Policy, which purpose is to lay the groundwork for the Inditex Group to manage, in an orderly and systematic way, our relations with stakeholders on relevant issues and matters in the area of sustainability.

ⓘ More information in section *MDR-P. Policies* of this Report.

Partnerships

Partnerships with organisations and institutions are paramount for Inditex, as they enable us to deepen our understanding of our stakeholders and join forces with key players to move inexorably towards a positive transformation of our sector, industry, society and planet.

Indeed, these partnerships help us contribute to achieving the Sustainable Development Goals (SDGs) and create economic, social and environmental value both in our value chain and in the communities where we operate.

That is why we cultivate partnerships with a number of governments, trade unions, academic institutions, local and international organisations and representatives of civil society.

In 2024 we preserved essential partnerships, such as those with International Apparel Federation, IndustriALL Global Union or the International Labour Organization, and established new collaborations, such as with the American Apparel & Footwear Association, and we joined initiatives such as RE100, promoted by the Climate Group, and *Pack4good*, a Canopy project. In addition, Inditex's CEO has been appointed in June 2024 as co-chairman of the steering committee of The Fashion Pact, an initiative of which we are co-founding partners.

We also signed up to the Deforestation-Free Call to Action for Leather by Textile Exchange and Leather Working Group, and launched a partnership with Iberia and Repsol to reduce the emissions of cargo flights.

ⓘ For further information, refer to the document *Partnerships* on Inditex's corporate website.

SBM-3. Material impacts, risks and opportunities

Impacts, risks and opportunities

SBM-3_01;
SBM-3_02;
SBM-3_11

Through our materiality assessment, we identify our material impacts, risks and opportunities (IROs).

In this sense, the assessment allows us to know:

/ Through the **impacts**: how our own activity and that of our value chain may positively or negatively affect the environment and people, including human rights.

/ Through the **risks and opportunities:** the potential financial implications stemming from the impacts and/or dependencies on resources, affecting our financial position and performance in the short, medium and long term, from both a negative perspective (risks) and a positive one (opportunities).

In 2024 we continued the review of our IROs, in accordance with the ESRS framework methodology, already anticipated in 2023. We are thus providing greater detail than in previous years, when we reported by groups of material topics. With regard to opportunities, we will continue to work on further analysis and development in order to be able to provide more information in future reporting periods.

Specifically, this year we have identified **47 material impacts, risks and opportunities.** More information on these and on the various related topics can be found in the topical standards in this Report.

Each impact, risk and opportunity has its own identification code to help pinpoint the main actions to which they are linked within each thematic standard.

ⓘ More information in section *IROs. Disclosures on the materiality assessment process* of this Report.

Material Impacts, Risks and Opportunities in 2024

	Type (I/R/O)	Affectation on Human Rights
E1 - CLIMATE CHANGE		
Greenhouse gas emissions (GHG)	I	
Energy consumption	I	—
Physical and transition risks related to climate change	R	—
E2 - POLLUTION		
Impact from the use of chemical substances	I	
Possible emissions of other pollutants and microfibres	I	
Transition risks due to pollution	R	—
E3 - WATER RESOURCES		
Water withdrawal	I	
Water discharge	I	
Physical and transition risks due to water resources	R	—
E4 - BIODIVERSITY AND ECOSYSTEMS		
Impacts relating to the exploitation, degradation and disruption of ecosystems and natural resources	I	
Physical and transition risks due to biodiversity and ecosystems	R	—
E5 - RESOURCE USE AND CIRCULAR ECONOMY		
Possible impact from the use of conventional raw materials	I	
Circularity	I	
Waste generation	I	
Transition risks due to the use of resources and the circular economy	R	—
Opportunity for new business models (e.g. Zara Pre-Owned)	O	—
Opportunity to improve efficiency in the consumption of natural resources	O	—
S1 - OWN WORKFORCE		
Quality employment	I	
Payment of adequate wages	I	
Efficient mechanisms for social dialogue and respect for the rights of freedom of association and collective bargaining	I	
Work-related accidents and occupational diseases	I	
Professional development	I	—
Possible impacts on vulnerable groups	I	
Possible loss of personal data	I	
Risks related to human capital	R	—
Business development opportunities by attracting and retaining talent	O	—

	Type (I/R/O)	Affectation on Human Rights
S2 - WORKERS IN THE VALUE CHAIN		
Working conditions	I	
Achievement of adequate wages	I	
Social dialogue and respect for the rights of freedom of association and collective bargaining	I	
Work-related accidents and occupational diseases	I	
Possible impacts on vulnerable groups	I	
Risks related to value chain workers	R	—
S3 - AFFECTED COMMUNITIES		
Value creation and community investment	I	
Possible violations of local communities' rights	I	
Risks related to local communities' rights	R	—
S4 - CONSUMERS AND END-USERS		
Possible loss of our customers' personal data	I	
Possible impacts related to the health and safety of our products	I	
Possibility of consumer discrimination	I	
Responsible marketing practices and transparency	I	—
Risks related to consumers' rights	R	—
Opportunity to attract new customers through responsible practices	O	—
G1 - BUSINESS CONDUCT		
Possibility of ineffectiveness of the grievance mechanisms	I	
Promotion of regulatory development and industry improvement	I	—
Possibility of corruption, fraud, bribery and other unlawful acts	I	—
Supplier relations management and responsible purchasing practices	I	
Risks arising from the relationship with key suppliers	R	—
Cybersecurity risk	R	—

SBM-3_04;
SBM-3_05;
SBM-3_07

Impact characteristics

Our global and integrated business model places us in direct connection with a globalised environment that implies the existence of impact points where our Company might influence our surroundings, whether positively or negatively. Equally, for us this might translate into negative effects (risks), or positive ones (opportunities), which we endeavour to identify and manage in the best possible way.

Accordingly, in our analysis we consider both our own operations and our entire value chain, from product design right through until their use and end of life. In doing so we take a broad approach that allows us to also consider all those impacts that, while not necessarily linked to our activity, might be related to the communities where we are present (our extended value chain).

Based on this assessment, we observe the relationship between our strategy and business model and the existence of possible environmental, social and/or governance-related impacts:

/ **Environmental:** our production requires the sourcing of raw materials that involve the use of water, land and energy and that may have impact on biodiversity and ecosystems, such as cotton crops. In distribution, we move goods between various markets to reach our costumers, with an impact in terms of the emissions linked to climate change, which we are striving to reduce and mitigate through the initiatives detailed in our Climate Transition Plan. Furthermore, due to the nature of our product, we consider the possible impact linked to the shedding of fibres and microplastics, both during the manufacturing process of our articles and in their life cycle, including their end of life.

/ **Social:** we pay particular attention to those impacts that may affect people, from our own workforce to our consumers, including workers in our value chain and the community. Consequently, we identify the possible impacts on human rights, fair working conditions, diversity and inclusion and the health and safety of our teams in order to promote working environments in which well-being is a priority and to ensure that we have the best talent. We replicate this same approach, where the respect for human rights is paramount, throughout our value chain. With regard to the communities, our approach is based on the respect and protection of their rights, and we also aim to create value by implementing investment projects. Lastly, customer relations and the continuous improvement of their experience are among the drivers of our business model.

/ **Governance:** in line with our principles, we keep unwavering control of our business conduct, identifying the potential impacts linked to our own grievance mechanisms (Ethics Line), to the potential materialisation of unlawful actions, or to our supplier relations and responsible purchasing practices. This information regarding how our business model may impact on the environment and society also allows us to analyse our strategy, helping us to minimise the possibility of negative impacts and risks materialising, while seeking to maximise our positive impacts and opportunities.

In this regard, our efforts are aimed at preventing, mitigating and remedying those impacts that may generate an adverse effect, and promoting positive impacts, both on the environment and on people.

ⓘ More information on stakeholder engagement and our materiality assessment in section *IROs. Disclosures on the materiality assessment process* of this Report.

SBM-3_12

Our assessment also covers specific topics for our Company, beyond those provided by the ESRS. An example of one of these topics is cybersecurity.

Time horizons

SBM-3_06

We assess our IROs in the short, medium and long term. For **risks and opportunitie**s, we have identified a greater tendency towards possible materialisation in the medium and long term, especially notable in the case of environmental categories, associated with the increase in uncertainty factors over time. The materiality of social and governance matters remains constant in the different time horizons, as they are less dependent on external factors.

In terms of the **impacts**, the trend towards the medium term for environmental topics continues. However, we observe more short-term patterns in relation to impacts associated with social and governance matters, linked mainly to the importance of certain topics in the current context, and our actions this year.

SBM-3_10

Resilience

By identifying our impacts, risks and opportunities, we can validate that our strategy includes the most relevant sustainability topics, allowing us to be in a position to prevent and mitigate negative impacts or risks, as well as to harness and enhance our positive impacts and opportunities.

This, in turn, helps us to increase the resilience of our business model and boosts our capacity to tackle the challenges stemming from our activity.

Likewise, the Group is in the process of implementing a scenarios methodology for risk assessment, regardless of their nature, which, due to their criticality, could compromise the continuity of the business model. Based on their idiosyncrasies, risks are assessed in the short, medium and long term. The Group periodically updates its business continuity plan, which aims to ensure that essential operations are not halted in the event of potential disruptions.

Along these lines, we implement specific policies that tackle the various environmental, social and governance themes identified; we set monitoring targets for the key metrics; and we introduce actions aimed at addressing the main aspect detected, thereby helping us to prevent, mitigate and remedy possible effects from our impacts and risks, and to maximise the value of our opportunities.

SBM-3_03

Current and anticipated financial effects of risks and opportunities

With regard to the anticipated financial effects of risks and opportunities, only information relating to environmental standards for climate change (E1) is included.

We are currently in the process of developing a methodology to evaluate the anticipated financial effects relating to: pollution (E2), water (E3), biodiversity and ecosystems (E4) and resource use and circular economy (E5). This methodology will be extended to the rest of the topics covered in the ESRS.

The purpose is to report the information required by the ESRS standards in forthcoming years in accordance with the transitional provision set forth in the CSRD, in ESRS 1, section 10.4.

ⓘ More information in section *E1-9 Anticipated financial effects related to climate change* of this Report.

SBM-3_08

This year, no risks and opportunities were identified for which there is a significant risk that could trigger a material change in the valuation of the assets and liabilities booked in the financial statements for the following financial year.

IRO/MDR. Impact, risk and opportunity management

IROs. Disclosures on the materiality assessment process

IRO-1/IRO-2. Material impacts, risks and opportunities

Materiality assessment

IRO-2_01; IRO-2_02; IRO-2_13

In 2024, for the fourteenth consecutive year, we conducted our materiality assessment, which enabled us to identify the impacts, risks and opportunities to outline in this Report.

In this connection, we include a table of contents in the Annex presenting the disclosure requirements included in this Report and their location in the Report. Furthermore, in keeping with CSRD disclosure requirements, we have identified those paragraphs of the directive, included in *ESRS 2 - General Information, Appendix B* that are material according to our assessment, along with their location in the Report.

ⓘ More information in annexes *Table of contents required by Directive 2013/34/EU* and *Table of contents of information deriving from other EU legislation* of this Report.

IRO-1_01

In our assessment we applied a methodology based on the **European Sustainability Reporting Standards (ESRS**), **IG1: Materiality Assessment Implementation Guidance**, and the guidelines provided in the various supporting documents and recommendations provided by the European Financial Reporting Advisory Group (EFRAG). We also follow the recommendations outlined by the Global Reporting Initiative in its GRI 3: Material Topics 202 standard.

The assessment is based on a **double materiality** focus, examining both our potential impacts on the surrounding (impact materiality) and risks and opportunities for our Company (financial materiality).

IRO-1_05

Our stakeholders —both internal and external— play a very important role during the process:

/ We conducted interviews with organisations representing our different stakeholders, establishing a Materiality Advisory Network, which includes universities, trade unions, business organisations and organisations specialising in environmental and social issues such as: the University of Leeds, the University of Oxford, Zero Discharge of Hazardous Chemicals (ZDHC), Conservation International (CI), the Pacific Institute, ECODES, the Climate Group, the United Nations Global Compact, the International Organisation of Employers (IOE), the Ethical Trading Initiative (ETI) and UNI Global Union.

/ Various workshops were held with relevant areas of the Company.

/ We collaborated and consulted with external specialist teams, such as the sustainability intelligence company Risilience and its academic partner, the Centre for Risk Studies at the University of Cambridge, and Shift, a leading organisation in the United Nations Guiding Principles on Business and Human Rights.

IRO-1_02; IRO-1_07

The double materiality process, detailed throughout this section, comprises **the following main phases.** They are preceded by a continuous process of assessment and understanding of our context, as well as a review and updating of our methodology, which allows us to stay abreast of the latest trends in the field.

1) Identification of impacts, risks and opportunities (IROs).

2) Assessment of impact materiality and financial materiality.

3) Validation of results and approval.

IRO-1_03;
IRO-1_04;
IRO-1_08;
IRO-1_14

1) Identification of impacts, risks and opportunities

To identify the impacts, risks and opportunities, we drew on the analysis of our activity and the relationship with our environment, including both our own operations and our business relationships and value chain. Furthermore, since 2023 we have been using as our preferred source for determining our impacts the list of recommended topics in the European Sustainability Reporting Standards (ESRS), specifically in ESRS 1 - Application Requirement 16.

This identification is fuelled by the results of our due diligence processes in the case of impacts, and by our risk map in the case of risks and opportunities. Other relevant sources include the matters addressed by stakeholders in our ongoing dialogue throughout the year, analysis of industry trends and social and online media, and the issues addressed in our Ethics Line.

In the specific case of environmental matters, we have taken the LEAP approach (Locate, Evaluate, Assess and Prepare) as a reference, and we used a range of science-based databases and indices, such as Exploring Natural Capital Opportunities, Risks and Exposure (ENCORE), Integrated Biodiversity Assessment Tool (IBAT), Critical Habitat – developed by the UN Environment Programme World Conservation Monitoring Centre (UNEP-WCMC)- and the Common International Classification of Ecosystem Services (CICES), among others.

Furthermore, in order to identify risks and opportunities, we examine our impacts to detect their connections with possible negative or positive financial effects and we analyse our dependencies on natural and/or social resources. In addition, to analyse those related to the climate, we used the framework of Task Force on Climate Related Financial Disclosures (TCFD), which has been used in recent years.

With regard to opportunities, this is an area where we will continue to work on further analysis and development in order to be able to provide more information in future reporting periods.

IRO-1_06

2) Materiality assessment

Impact materiality
The impacts identified in the previous phase are assessed based on the following parameters, which are determined based on the information compiled in workshops with our internal specialised areas, interviews with our stakeholders and the advice provided by Resilience.

/ Scale: how grave or beneficial the impact is or would be for people or the environment.

/ Scope: how widespread the impact is, based on the geographic extent of the effects and the stakeholders affected.

/ Remediability: degree of difficulty involved in counteracting or remedying the damage, applying only to negative impacts.

/ Likelihood: chance of a potential impact happening.

In addition, the possible affectation of impacts on **human rights** is also analysed; in such cases, even if the impact is only potential, the probability is assumed to be 100%.

In parallel, we qualitatively evaluate the **time horizon**[5] in which the impact would occur.

Thresholds (defined in accordance with the EFRAG materiality guidelines) are applied to these results to determine the materiality of the impacts.

IRO-1_09;
IRO-1_10;
IRO-1_12;
IRO-1_13

Financial materiality
To gauge the financial materiality of the risks and opportunities, we assess the following parameters, which are determined through workshops with internal expert areas:

/ Magnitude of the financial effect: actual or potential deviation of free cash flows estimated by the Group in the various time horizons discounted on the assessment date.

/ Probability: possibility of a potential risk or opportunity taking place in a specific time horizon.

These parameters are used not only for prioritising sustainability-related risks, but also for those belonging to any other risk category of the Group, since the methodology used in financial materiality is aligned with that used for the Risk Map, a fundamental part of the Group's Integrated Risk Management System (IRMS).

[5] The time horizons defined for this assessment are the same for both financial materiality and impact materiality: short term up to one year, medium term up to five years, and long term from five years onwards.

For the calculation, we enter estimates for the financial variables of the Company's income statement, such as those related to revenues and routine costs. This way, we obtain the stressed cash flow for the different time horizons, which we use to calculate the magnitude of the financial effect. This magnitude, adjusted by the estimated probability of occurrence, gives the resulting financial materiality.

The thresholds applied to determine financial materiality are consistent with those used in the identification and assessment process followed in drawing up the Risk Map. Once the result has been obtained, we consider that a time horizon is material if in at least one of its years the risk or opportunity is material. Likewise, if at least one of the time horizons is material, the risk or opportunity is considered material.

ⓘ More information in section *Additional information. Responsible risk management* of this Report.

3) Validation of results and approval

IRO-1_11

The results of the materiality assessment are validated internally, in the first instance by the Company's management and subsequently by the Sustainability Committee.

At the external level, the Social Advisory Board also takes part in the validation, contributing to the integration of the perspective of different stakeholders in our materiality assessment.

Lastly, it is worth noting that the result of the materiality assessment forms the basis of this Report, which was prepared by the Board of Directors of Inditex, following the favourable report by the Audit and Compliance Committee and the Sustainability Committee, both responsible for verifying and overseeing the information included in it, each in accordance with their respective areas of competence.

Updates to the materiality assessment in 2024

IRO-1_15

In 2024 we continued our methodological update, which commenced in 2023, with a view to full accommodation to EFRAG guidance. Primarily, we have updated our process for determining risks and opportunities to gauge their connections with both impacts and dependencies.

We also changed the way we engage our stakeholders in the materiality analysis, transitioning from a survey-based model to one focused on interviews, which enables us to personalise our interaction with them and glean more valuable information.

Furthermore, we incorporate the latest EFRAG guidance on impact and financial materiality, as well as the industry trends.

MDR-P. Policies

Inditex is committed to creating economic, social and environmental value for all its stakeholders, in order to generate the greatest possible positive impact and contribute to sustainable development.

Our engagement with stakeholders is founded upon constant dialogue and transparency. This same approach is applied to the construction and updating of the Group's Codes of Conduct and policies.

To adapt our policies to legal or organisational changes, and to incorporate best practices, we implement updates whenever this is deemed necessary. In 2024, we can highlight the approval of the **new version of the Code of Conduct** and the execution, during the year, of an ambitious global campaign on the same with the aim of strengthening the corporate ethical culture.

As a result of the update of the Code, legal requirements, good practices or the Group's operations, a major review of internal regulations has also been carried out. Specifically, nine corporate policies have been approved or modified: the Gifts and Invitations Policy, the Conflicts of Interest Policy, the Human Rights Policy, the Criminal Risk Prevention Policy, the Policy on Public Policy, the Enterprise Risk Management Policy, the Internal Regulations Policy, the Policy for Representatives and Attorneys of Companies within the Inditex Group and the Ecosystems and Biodiversity Policy. Along the same lines, in February 2025, four policies were approved or modified: the Sustainability Policy, the Sustainability Stakeholder Relations Policy, the Energy Policy and the Water Policy.

In order to facilitate access to and knowledge of all these Policies, communication and awareness-raising actions have been carried out among the Group by publishing and sending newsletters on them, as indicated in section *G1-3. Prevention and detection of corruption and bribery* of this Report.

The main sustainability policies are listed below. These are available on the corporate intranet (INET) and the corporate website, www.inditex.com.

Transversal action principles	/ Code of Conduct ⓘESRS 2 / Code of Conduct for Manufacturers and Suppliers ⓘESRS 2 / Human Rights Policy ⓘESRS 2 / Sustainability Policy ⓘESRS 2 / Sustainability Stakeholder Relations Policy ⓘESRS 2
Action principles related to environmental standards	/ Energy Policy ⓘ E1 / Water Policy ⓘ E3 / Ecosystems and Biodiversity Policy ⓘ E4
Action principles related to social standards	/ Diversity and Inclusion Policy ⓘ S1 / Global Anti-Harassment Policy ⓘ S1 / Occupational Health and Safety Policy ⓘ S1 / Community Investment Policy ⓘ S3 / Information Security Policy ⓘ S4 / Compliance Policy regarding Personal Data Protection and Privacy ⓘ S4
Action principles linked to governance standards	/ Compliance Policy ⓘ G1 / Due Diligence Policy ⓘ G1 / Policy on Public Policy ⓘ G1 / Criminal Risk Prevention Policy ⓘ G1 / Integrity Policies ⓘ G1 / Anti-Money Laundering and Terrorist Financing Policy ⓘ G1 / Conflicts of Interest Policy ⓘ G1 / Global Policy on Internal Reporting Channels ⓘ G1 / Ethics Line Procedure ⓘ G1

ⓘ More information on Inditex's action principles in the '*Ethical Commitment*' section of our corporate website.

MDR-P_01;
MDR-P_02;
MDR-P_03;
MDR-P_04;
MDR-P_05

This section contains fundamental information on our transversal Policies and Codes of Conduct, that apply across all the standards. The Policies that address specific issues are located in the most representative standard throughout the Report.

Code of Conduct

Approved by the Board of Directors on 17 July 2012 and amended on 6 February 2024

Key contents	/ Ethical commitments as a Company / The principles that guide our conduct as a part of the Inditex team and with respect to external stakeholders (respect, honesty and integrity, transparency and responsibility) / Grievance mechanisms / Four thematic blocks: investing in people's development, maintaining our integrity, driving sustainable development, and protecting our assets and information
Scope	/ The entire Group (companies and individuals) / People who provide services or collaborate with the Group (including the Board of Directors) / It promotes the alignment of suppliers, factories along the supply chain and third parties engaged with the Group with the Code
Accountable for the implementation	/ Ethics Committee
Third-party standards	/ The UN International Bill of Human Rights / Main ILO Conventions / Principles of the United Nations Global Compact
Consideration given to stakeholders	/ Collaboration in the review process of a representative group of employees and with the Social Advisory Board of Inditex / The European Works Council was informed

Code of Conduct for Manufacturers and Suppliers

Published in 2001 and last updated by the Board of Directors on 17 July 2012

Key contents	/ Minimum standards for an ethical and responsible behaviour that must be observed by all of the Group's manufacturers and suppliers / Pre-requisite to be a part of our supply chain
Scope	/ All manufacturers and suppliers involved in purchasing, manufacturing and finishing of the products sold by the Group
Accountable for the implementation	/ Ethics Committee
Third-party standards	/ Principles of the Organisation for Economic Cooperation and Development (hereinafter, the 'OECD') / Base Code of the Ethical Trading Initiative / Principles of the United Nations Global Compact / ILO Conventions numbers 1, 14, 26, 29, 79, 87, 98, 100, 105, 111, 131, 135, 138, 142, 155, 164 and 182, among others.
Consideration given to stakeholders	/ Consideration of the interests of supply chain factory workers

Human Rights Policy

Approved on 12 December 2016 by the Board of Directors and last updated on 6 February 2024

Key contents	/ Commitment to respect internationally recognised human rights, both labour and non-labour / Identification of the rights most directly linked to the Group's activities and stakeholders
Scope	/ The entire Group (companies and individuals) / People who provide services or collaborate with the Group (including the Board of Directors)
Accountable for the implementation	/ Sustainability Department and its chief officer
Third-party standards	/ The UN International Bill of Human Rights / ILO Fundamental Conventions numbers 29, 87, 98, 100, 105, 111, 138, 155 and 182 / The ILO Declaration on Fundamental Principles and Rights at Work / The Ten Principles of the UN Global Compact / The United Nations Guiding Principles on Business and Human Rights / OECD Guidelines for Multinational Enterprises / 17 UN Sustainable Development Goals
Consideration given to stakeholders	/ Consideration of stakeholders' expectations and involvement of the Social Advisory Board

Sustainability Policy

Approved by the Board of Directors on 9 December 2015 and amended on 4 February 2025

Key contents	/ The Group's commitment to Sustainability / General principles and action lines for integrating sustainable practices throughout the business model and stakeholder engagement / Commitment to driving a transformation that contributes to the development of a fair and resilient society and a clean, healthy and sustainable environment
Scope	/ The entire Group (companies and individuals) / People who provide services or collaborate with the Group (including the Board of Directors) / It promotes the alignment of suppliers, factories along the supply chain and third parties engaged with the Group with the Policy
Accountable for the implementation	/ Sustainability Department and its chief officer

Third-party standards	/ The UN International Bill of Human Rights / ILO Fundamental Conventions and Declaration on Fundamental Principles and Rights at Work / ILO Convention 169 concerning Indigenous and Tribal Peoples / The United Nations Declaration on the Rights of Indigenous Peoples / The Ten Principles of the United Nations Global Compact / The United Nations Guiding Principles on Business and Human Rights / OECD Guidelines for Multinational Enterprises / Global Assessment Report on Biodiversity and Ecosystem Services, published by IPBES / The Kunming-Montreal Global Biodiversity Framework / Paris Agreement - United Nations Framework Convention on Climate Change / Intergovernmental Panel on Climate Change (IPCC) / Strategic framework of the United Nations Convention to Combat Desertification (UNCCD) / Principles covered by the CEO Water Mandate initiative
Consideration given to stakeholders	/ Information on the sustainability strategy, the programmes on which it is structured, its goals and progress is shared with stakeholders. In addition, their perspective is factored into the Group's sustainability actions / Participation of the Social Advisory Board

Sustainability Stakeholder Relations Policy

Approved by the Board of Directors on 4 February 2025

Key contents	/ Grounds for managing stakeholder engagement in connection with sustainability
Scope	/ The entire Group (companies and individuals) / People who provide services or collaborate with the Group (including the Board of Directors)
Accountable for the implementation	/ Sustainability Department and its chief officer
Consideration given to stakeholders	/ Participation of the Social Advisory Board

5. Environmental information
[ESRS E]

E1. Climate change

E2. Pollution

E3. Water resources

E4. Biodiversity and ecosystems

E5. Resource use and circular economy

Disclosure pursuant to article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)



E1. Climate change

A. Governance

Our climate governance is aimed at ensuring that the impacts, risks and opportunities linked to climate are adequately tackled to meet the challenges posed by climate change.

In this regard, our sustainability strategy and our climate change policies are approved by the Board of Directors and integrated into our Company's business model and decision-making processes.

Our Climate Transition Plan establishes our targets for advancing towards a low-carbon economy. To ensure that our sustainability actions are aligned with these targets, the Board of Directors —through the Sustainability Committee— carries out quarterly reviews.

Climate governance follows the same processes and is carried out through the same bodies as are the rest of sustainability-related matters.

ⓘ More information in section *GOV. Governance* of this Report.

GOV-3. Integration of sustainability-related performance in incentive schemes

E1.GOV-3_01; E1.GOV-3_02; E1.GOV-3_03

At Inditex we promote mechanisms to advance in achieving our decarbonisation targets, such as our variable remuneration system.

This system links our workforce remuneration to the attainment of the Company's objectives, including our sustainability commitments. For example, both the Chief Executive Officer and Senior Management have specific, annual and multi-year incentives associated with climate change mitigation.

ⓘ More information in the *Annual Report on Remuneration.*

ⓘ More information in sections *GOV-3. Integration of sustainability-related performance in incentive schemes* and *S1-10/ S1-16. Compensation metrics* of this Report.

B. Strategy

E1-1. Transition plan for climate change

Our sustainability commitments

E1-1_02

Since the adoption of our science-based targets (SBTs) in 2020, scientific knowledge on climate change and its effects has evolved, and so has our ambition and that of our stakeholders.

That is why, in July 2023 we unveiled our new **sustainability commitments**, that included more exacting decarbonisation targets, which we submitted to the Science Based Target Initiative (SBTi) for approval.

In 2024, our new SBTs were approved by SBTi in accordance with the Paris Agreement emissions reduction pathway —limiting the average temperature increase of the Earth's surface to 1.5ºC above pre-industrial levels— . Our goal is to reduce our scope 1, 2 and 3 emissions[6] by 53% by 2030 with respect to 2018. To achieve this we will pare our absolute scope 1 and 2 emissions by 95% and our scope 3 emissions by 51% by 2030. As an intermediate milestone to keep up with our progress, we have set ourselves the goal of reducing scope 1, 2 and 3 emissions by 20% by 2027, as compared to 2018.

SBTi also approved our global net-zero emissions target by 2040, thereby slashing our scope 1, 2 and 3 emissions by 90% as compared to 2018. The remaining 10% will be neutralised by eliminating greenhouse gas emissions, as established in the SBTi guidelines.

ⓘ More information in sections *E1-4. Targets related to climate change* and *E1-3. Actions related to climate change* of this Report.

Climate Transition Plan

E1-1_01

Pursuant to our targets, in 2023 we published our new **Climate Transition Plan**, which evidences Inditex's commitment to a more efficient and circular fashion industry, more capable of tackling the climate challenge.

The Plan includes our action lines and intermediate milestones, as well as the resources we estimate will be needed to attain our targets on the pathway to net-zero emissions by 2040.

Our Transition Plan is consistent with our SBTs, pursuing a GHG emissions reduction pathway aligned with the Paris Agreement ambition of limiting global warming to 1.5ºC over pre-industrial levels.

In drawing up the Plan we used the 'announced policies' emissions scenario, given the current level of climate policy ambition around the world. This pathway envisages the global economy decarbonising at a slower rate than Inditex's reduction commitments, outlined in our Climate Transition Plan, which aim to reach net zero by 2040.

In accordance with this commitment, Inditex's future emissions pathways factor in the effect of our own emissions reduction initiatives, as specified in the Transition Plan, and the effect of the announced industry decarbonisation in relation to scope 2 and 3 emissions.

ⓘ More information in the Climate Transition Plan available on Inditex's corporate website.

[6] Our 2030 and 2040 SBTs include the following categories of scope 3 emissions: purchased goods and services (category 1), fuel- and energy-related activities (category 3), upstream transportation and distribution (category 4), waste generated in operations (category 5), business travel (category 6), employee commuting (category 7), end-of-life treatment of sold products (category 12), downstream leased assets (category 13) and franchises (category 14). The base year was chosen in accordance with SBTi's criteria for the completeness, verification, representativeness and ambition of the emissions inventory.

E1-1_03

The decarbonisation levers included in our Climate Transition Plan encompass a series of actions in our operations and value chain, focusing on:

Main decarbonisation levers		Key actions	More information in
Reduction	Use of improved energy sources	/ Own operations: self-consumption, power purchase agreements, sustainable building / Supply Chain Environmental Transformation Plan	*E1-3; E2-2; E3-2; E3-3*
	Optimisation of energy management		
	Promoting circularity and the use of lower-impact materials	/ Sustainability Innovation Hub / Fibres Plan / Pre-Owned	*E5-2; E5-3*
Neutralisation	Promoting and fostering regenerative practices	/ Fibres Plan / Cotton Strategy / Revitalisation of soils and ecosystems to sustain communities and biodiversity / Conservation, protection and restoration of ecosystems and biodiversity	*E4-3; E4-4; E5-2; E5-3*
	Application of other nature-based solutions		
	Application of technological solutions		
Mitigation beyond the value chain	Fostering biodiversity and balanced ecosystems as well as community well-being		

E1-1_04;
E1-1_05;
E1-1_06;
E1-1_13

ⓘ More information on the economic resources allocated to the Climate Transition Plan in sections *E1-3. Actions related to climate change*, *E4-3. Actions related to biodiversity and ecosystems* and *E5-2. Actions related to resource use and circular economy* of this Report.

E1-1_14

Approval of the Transition Plan

As mentioned in our sustainability governance model, our Chief Executive Officer is responsible for defining and approving the sustainability strategy approved by the Board of Directors. In this regard, in particular the Climate Transition Plan was also presented to the Social Advisory Board and the Sustainability Committee, and announced to our shareholders in the General Meeting, thereby ensuring the involvement of our governing bodies in its review and approval.

E1-1_08

Relationship with the taxonomy

As indicated in the section *Disclosure pursuant to article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)*, we report information in relation to the Taxonomy since 2021 in accordance with the Commission Delegated Regulation (EU) 2021/2139 (Climate Delegated Act).

Although our main activity is not yet included in the Taxonomy Regulation, we endeavour to implement measures to align our current and future actions with the Taxonomy's technical screening criteria in the activities to which it applies, such as in store refurbishments and openings, construction and refurbishment of corporate headquarters, Group logistics centres and other own facilities, and electricity generation from wind and photovoltaic power. We also have investment plans to align ongoing projects that are scheduled for completion in future years.

ⓘ More information in section *Disclosure pursuant to article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)* of this Report.

E1-1_15

Progress to date

Throughout 2024, we have continued to strengthen our commitment to responsible resource management —in particular of energy— and to reducing GHG emissions, through initiatives like:

/ Fostering self-consumption and power purchase agreements.

/ Using renewable energy in our own operations and in the supply chain.

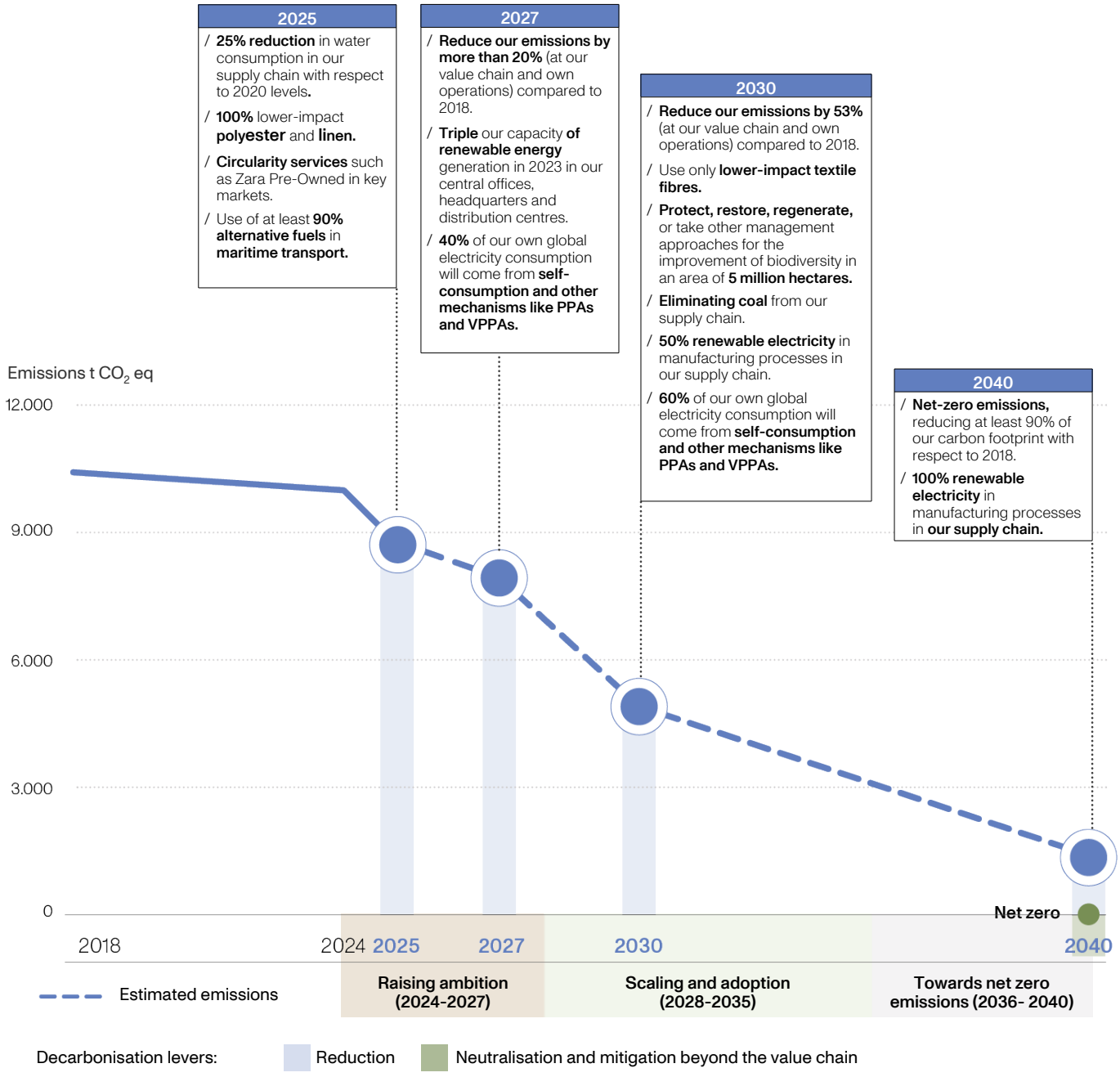
/ Launching the Supply Chain Environmental Transformation Plan 2024-2027.

/ Further headway in our 2030 Fibres Plan.

/ Using alternative fuels rather than fossil fuels in maritime transport.

ⓘ More information in sections *E1-3. Actions related to climate change*, *E1-4. Targets related to climate change* , *E1-5. Energy consumption and mix* and *E5-2. Actions related to resource use and circular economy* of this Report.

Towards net-zero emissions



E1-1_12

In addition, it is worth noting that the Group has not been excluded from the EU Paris-aligned benchmarks, given that the requirements pursuant to Article 12 of Delegated Regulation (EU) 2020/1818 are not applicable.

IRO-1/SBM-3. Material climate-related impacts, risks and opportunities

Identification of Impacts, Risks and Opportunities

E1.IRO-1_01; E1.SBM-3_07

The Group's commitment to mitigating the effects of climate change are most notably reflected in our Climate Transition Plan. This understanding of the effects of climate change is also related to our **annual materiality assessment**, in which we identify a list of climate-related impacts, risks and opportunities, by actively listening to our stakeholders.

We also carry out an **analysis of climate scenarios**, through which we studied five emissions pathways and determined the potential impact of the physical and transition risks in our activity and our own facilities and those of our value chain in the short, medium and long term.

In particular, one of our main impacts are atmospheric greenhouse gas (GHG) emissions in our value chain. In this regard, we identified Inditex's current and possible future sources of GHG emissions, in both our own operations and the value chain, in accordance with the guidelines of the Intergovernmental Panel on Climate Change (IPCC – Guidelines for National Greenhouse Gas Inventories, 2006) and the World Resources Institute's GHG Protocol (2015). Furthermore, in calculating and reporting Inditex's current and estimated future GHG emissions (according to our Climate Transition Plan), we follow the same international guidelines.

ⓘ More information in section *E1-6. GHG emissions* and in the *Methodological Annex* of this Report.

Material Impacts, Risks and Opportunities related to climate

		TYPE (I/R/O)	PHASE OF THE VALUE CHAIN [1]	RELATED POLICIES
E1.I1	**Greenhouse gas emissions** (GHG)	I	/ Own operations / Value chain	**Transversal policies:** / Sustainability Policy / Sustainability Stakeholder Relations Policy **Specific policies:** / Energy Policy / Ecosystems and Biodiversity Policy / Water Policy
E1.I2	**Energy consumption**	I	/ Own operations / Value chain	
E1.R1	**Climate-related physical and transition risks**	R	/ Own operations / Extended value chain	

[1] The extended value chain comprises the environment and the communities in which we are present even if they are not directly linked to our activity.

ⓘ More information on stakeholder engagement and our materiality analysis can be found in sections *SBM-3. Material impacts, risks and opportunities* and *IROs. Disclosures on the materiality assessment process* of this Report.

With regard to opportunities, this is an area where we will continue to work on further analysis and development. Given that climate-related opportunities also affect other environmental aspects and dimensions, we will include them in the following environmental chapters of this Report. Such is the case of the efficient consumption of natural resources, new business models, the transformation of the sector and innovation, among others.

As for more complex opportunities like the strategic transformation of the Company and its resilience, we will continue to analyse them with a view to providing more information in future reporting exercises.

ⓘ More information in section *E5-2. Actions related to resource use and circular economy* of this Report.

Based on our identification and assessment of climate-related impacts, risks and opportunities, we adapt our sustainability strategy in the short, medium and long term, which applies to all our business areas. For instance, in 2023 we developed our new **Climate Transition Plan**, which evidences our commitment to a more efficient and circular fashion industry capable of tackling the climate challenge. To make headway in these targets, in 2024, we rely on the Fibres Plan and the Supply Chain Environmental Transformation Plan.

Moreover, at Inditex we are convinced that fostering a culture of sustainability in all areas of our company is key to making constant progress towards our sustainability targets. **The Sustainable Fashion School** and **Changemakers** are the product of this vision.

ⓘ More information in sections *E1-1. Transition plan for climate change*, *E1-3. Actions related to climate change*, *E5-3. Targets related to resource use and circular economy* and *S1-4. Actions related to own workforce* of this Report.

Analysis of climate-related risks

E1.IRO-1_02; E1.IRO-1_09; E1.IRO-1_05; E1.IRO-1_17; E1.IRO-1_18; E1.IRO-1_19; E1.IRO-1_20; E1.SBM-3_02

At Inditex we take an integrated approach to risks. By analysing climate scenarios we identify and assess risks and opportunities to ensure the resilience of our strategy in the short, medium and long term. This analysis includes both high emissions pathways and those in line with the 1.5ºC emissions pathways.

To quantify the potential climate-related physical and transition risks, we use a representation of the Group. It is known as a 'digital twin' and is updated annually with information on financial estimates, facilities of our own and our value chain, raw materials used in our products, a geographic breakdown of the business and the Group's scope 1, 2 and 3 greenhouse gas emissions.

The result of the scenario methodology represents the potential losses in estimated cash flows in terms of Earning Value at Risk.

Due to the nature and long-term horizon of climate-related risks, especially in the physical dimension, the Group needs to estimate impacts over time horizons longer than five years. For this purpose, once the Group's expected cash flows for the short-term horizon (0-5 years) have been established, these financial estimates are used to assess the impacts on the different climatic conditions in the medium term (5-10 years) and the long term (more than 10 years)[7]. These time horizons take into account the useful life of our assets[8] and the Group's planning and business cycles.

[7] For the purposes of the materiality assessment, the time horizons of the climate-related impacts, risks and opportunities have been reconciled with those provided in ESRS 1.
[8] The time horizons were established on the basis of the useful life of the assets on the balance sheet. *Note 3.2.* Accounting Policies, b) Property, plant and equipment, which is reviewed annually. The useful life of the Group's assets is currently established in the medium to long term.

E1.IRO-1_03;
E1.IRO-1_10;
E1.SBM-3_01

Below are the short-, medium- and long-term physical and transition risks identified and taken into account for our analysis:

Climate-related risks for our Group

Physical risks

Acute

Caused by natural events, including more severe extreme weather events, like cyclones, hurricanes and floods, among others.

Chronic

Long-term changes in weather patterns that may cause an increase in sea level, chronic heat waves or changes to seasons, among other events.

These physical risks may cause damage to material goods and disrupt the supply chain in the following scenarios:

/ Changes in the availability and quality of water resources.

/ Vulnerability in respect of other specific resources or raw materials on which Inditex depends, such as cotton, viscose, etc.

/ Potential disruption in shipping routes.

/ Workers health and safety.

Transition risks

Market

The markets where we operate may be affected by climate change in different ways, but one of the main ones is through changes in the supply and demand of certain raw materials we use in our operating processes, and the products we sell to our customers.

Regulatory and legal

Government policy actions on climate change continue to evolve towards a low-carbon economy. Generally speaking, their objectives fall into two categories: initiatives aimed at reducing greenhouse gas emissions or policies designed to promote climate change adaptation. In this scenario, the Group's carbon footprint throughout its value chain (scope 1, 2 and 3 emissions) could be subject to the price of carbon.

Another risk to consider in the context of transition comes from the eventual legal liability of companies, depending on the evolution of the socioeconomic context, social perception and the scientific development of climate attribution.

Technology

In today's fast-evolving technological landscape, the Group may be exposed to the possibility of having to undertake sizeable investments in operations and infrastructure to adapt to climate change. It will also have to manage the depreciation and/or obsolescence of existing assets in its own operations that are not suited to a low-carbon economy. The members of our value chain face the same risk, which could eventually be passed on to the Group through higher sales and operating costs.

Reputation

As the pace of society's transition to a low-carbon economy picks up and public opinion changes, the Group's individual contribution may come under increasing scrutiny, especially if the Group's transition, or that of our industry, towards a low-carbon economy fails to meet the market's expectations.

ⓘ More information in section *E1-9. Anticipated financial effects related to climate change* of this Report.

E1.IRO-1_07;
E1.IRO-1_08;
E1.IRO-1_15;
E1.IRO-1_13;
E1.SBM-3_03;
E1.SBM-3_04;
E1.SBM-3_05;
E1.SBM-3_06

Scenario analysis

Through scenario analysis, we can learn about the potential impacts of climate change on our company. This knowledge can be applied to strategic planning, risk management and the evaluation of our resilience.

In 2024, we made further headway in the analysis of the resilience of our value chain so we could include in our analysis the mitigation measures that result from implementing our programmes to reduce our carbon footprint.

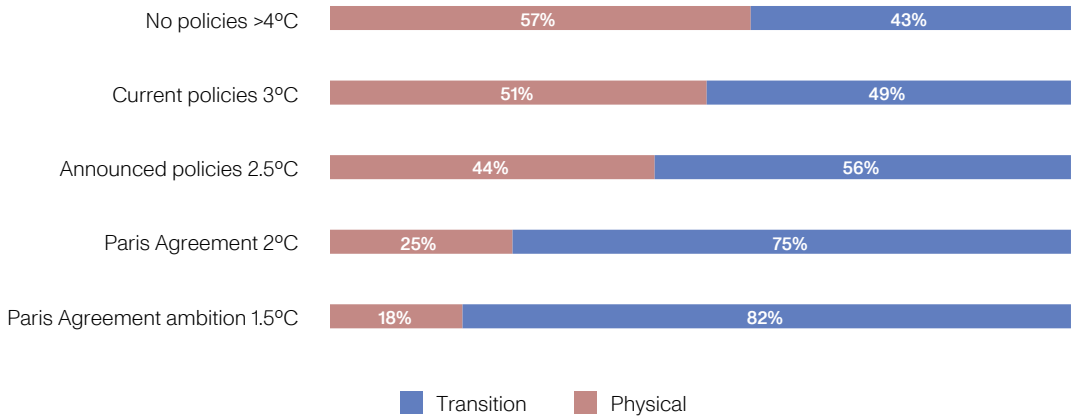
The emissions pathways used in our analysis of scenarios correspond to the latest data published in the Sixth Assessment Report from the Intergovernmental Panel on Climate Change (IPCC).

To assess the potential impacts on the Company stemming from physical and transition risks, we used five scenarios with five different emissions pathways:

/ No policies (>4ºC by 2100)
/ Current policies (3ºC by 2100)
/ Announced policies (2.5ºC by 2100)
/ Paris Agreement (2ºC by 2070)
/ Paris Agreement ambition (1.5ºC by 2050)

Each pathway develops a socio-economic narrative towards regulatory changes, energy outlooks or technological advances on the basis of existing data, probability of occurrence and severity.

With respect to total estimated risk, the table below shows the result of the physical and transition dimensions in each of the pathways[9] in the short term:



ⓘ More information in section *E1-9. Anticipated financial effects related to climate change* of this Report.

E1.IRO-1_16

Furthermore, as stated in *Note 2* to the Consolidated Annual Accounts, in the estimates used to measure certain assets, liabilities, income, expenses and obligations reported therein, climate change related-risks were considered, in particular those associated with the scenarios for those assessments.

E1.IRO-1_04;
E1.IRO-1_06;
E1.SBM-3_06

Physical risks

There are three possible types (dimensions) of physical risks from climate change:

/ Acute risks: caused by extreme weather events.
/ Chronic risks: the result of gradual changes in long-term weather patterns.
/ In some cases, there may be **a combination of both** acute and chronic.

In 2024, the analysis of physical risks was conducted on over 15,700 own and third-party facilities in our value chain. The facilities analysed are of different types: factories, logistics centres, offices, airports, ports, logistics hubs, stores, etc. In the case of our own facilities, we estimate the physical damage associated with extreme weather phenomena and the resulting financial losses, as well as operating losses due to reduced operating capacity and efficiency.

These climate phenomena are considered in the long-, medium- and short-term analysis: heatwave, freeze, water stress, river flooding, coastal flooding, 'extratropical' storm, tropical storm and flash flooding. The choice of these physical phenomena is based on Cambridge University's Centre for Risk Studies relevance criteria for our business.

[9] Climate modelling is a complex discipline that is exposed to three uncertainties: natural climate variability, how accurate the climate model turns out to be, and how accurate the emissions scenario proves to be. Climate scenarios are not forecasts, predictions or sensitivity analyses, but hypothetical constructions of plausible future situations based on science, aimed at assessing the resilience of a company's assets, business model and strategy to such scenarios.

In order to weigh the financial impacts of extreme weather events caused by climate change, the changing probability and severity of each event is used to quantify the increase or reduction of the physical impacts expected at facility level. The base-case scenario also makes it possible to assess existing risks, especially water stress in the catchment areas where the Group's own or third-party facilities are located, particularly in Spain, where the Group's main assets are concentrated.

Over the course of this year we have experienced nine natural disasters in our stores due to extreme weather phenomena (four in Spain, one in Italy, one in Mexico, two in the United States and one in Austria), mainly due to torrential rain, heavy snow or hail, hurricanes or tornadoes. Although they caused damage to our stores, their impact on the Group was immaterial.

Financial impact of physical climate-related risks[(1)]

Physical dimension: Acute 

Scenario

This scenario envisages the possibility that extreme or catastrophic weather events may reduce the productivity of the Group's activities, disrupt its normal performance and/or increase the costs of operations and processes. The vulnerability of facilities to the various climate threats depends on their type and/or their importance for the value chain. According to these attributes, the scenario translates into different impacts and speeds at which the facilities can recover normal operating conditions.

Impact on business model

The disruption may trigger a decrease in expected cash flows due to a decline in Group sales depending on the operations' level of dependence on the affected facility or facilities, possible impairment of property, plant and equipment and loss of inventories.

Main mitigations

/ Most of the facilities are related to the supply chain and our commercial network so there are technical contingency systems in place that would mitigate the consequences of a disruption or shutdown.

/ Continuous review systems, along with the insurance policies, would cover loss of profit and resulting expenses.

/ In the specific case of logistics centres, they have been configured so as to be able to take on storage and distribution capacity for other centres in the event of a contingency caused by extreme weather events.

ⓘ More information in section *Responsible risk management* of this Report.

Physical dimension: Acute and Chronic 

Scenario

This scenario envisages the possibility that unexpected extreme weather events may cause disruptions in estimated revenue in the short term due to changes in consumer demand.

Impact on business model

Extreme weather events can impact short-term normal earnings flows. Sales may be affected by changes to demand if consumers change their behaviour due to the weather, reduced retail traffic or if the value chain experiences local disruptions.

Main mitigations

/ All areas of the Group are geared towards satisfying customer needs and guaranteeing the best shopping experience, which is why our activity begins by actively listening to our customers and identifying their demands and expectations.

/ Flexible, integrated and innovative business model that affords a competitive advantage when it comes to analysis and response in the short, medium and long terms.

ⓘ More information in section *SBM-1. Strategy, business model and value chain* of this Report.

Physical dimension: Chronic 

Scenario

This scenario envisages changes in long-term weather patterns affecting the agricultural productivity of the crops from which the various textile fibres used by the Group are derived (cotton, linen, wool, leather and man-made cellulosic fibres, among others). The effect of such phenomena would be a potential change in the supply and availability of raw materials.

Impact on business model

Losing the supply of these raw materials would disrupt business, potentially resulting in a decrease in sales if the shortage caused by the event cannot be recovered and/or selling costs rise due to a reduced or absent supply of the raw materials.

Main mitigations

/ We have put a Climate Transition Plan in place to drive industry transformation and make progress in the fight against climate change.

/ Our Fibres Plan contains stringent commitments for the use of lower-impact materials.

/ The Group's efforts and work to foster the development of technologies to improve the sustainability of the raw materials and their subsequent recycling, with particular attention to innovation in recycled fibres of textile origin that allow reducing dependence on virgin raw materials.

/ The Group's collaboration with other organisations and institutions to increase the range of materials with better environmental performance, which make more efficient use of natural resources, and with recycled content.

(1) The risk trend reflected here corresponds with the short term.

Transition risks

E1.IRO-1_11; E1.IRO-1_12; E1.SBM-3_06

Transition risks vary significantly depending on the level of ambition of each pathway analysed and affect all areas of our business.

To calculate their financial impact, we have examined five dimensions of transition risks in the short, medium and long term:

/ Regulatory
/ Legal liability
/ Technology
/ Market
/ Reputation

We have found that the largest potential short-term impact on our operations and business model derives from regulatory risk, due to potential policy action by governments to tackle climate change in the transition to a low-carbon economy.

Financial impact of transition risks (1)

Transition dimension: Regulatory

Scenario

Establishing an explicit carbon price is a key mechanism to incentivise the transition to a low-carbon economy. Carbon prices used in our models vary from country to country with the aim of covering all global emissions by 2025.

Impact on business model

In this scenario, the Group would pay a price for the emissions generated throughout its value chain. The Group's carbon footprint in each of the markets in which it operates is considered and the carbon price in each jurisdiction is applied. The Group's financial impact stems from the increase in production and distribution costs, and the cost of raw material procurements.

Main mitigations

/ We have put a Climate Transition Plan in place to drive industry transformation and make progress in the fight against climate change.

/ We have therefore launched two key strategic plans: the Supply Chain Environmental Transformation Plan and the Fibres Plan to advance towards a low-carbon economy model and meet our sustainability targets.

ⓘ More information in sections *E1-1. Transition plan for climate change*, *E1-3. Actions related to climate change*, *E2-2. Actions related to pollution*, *E3-2. Actions related to water resources* and *E5-2. Actions related to resource use and circular economy* of this Report.

Transition dimension:
Legal liability

Scenario

This scenario considers developments in climate-related litigation, a consequence of scientific advances that allow climate change to be linked to specific events, paving the way for potential attributions of liability.

Impact on business model

The intensity of lawsuits related to GHG emissions and climate change that the Group may experience will vary depending on the different emissions pathways. Their probability of occurrence and potential impact will also vary depending on the estimated impact (settlement, legal costs, severance pay, etc.).

Main mitigations

/ Inditex's Climate Transition Plan, Supply Chain Environmental Transformation Plan and Fibres Plan.

/ Inditex's Sustainability Policy, which defines the principles for integrating sustainable practices, in keeping with the Planetary Boundaries and with respect for human rights and those of other living beings, throughout our business model, activities and stakeholder relations.

ⓘ More information in section *MDR-P. Policies* of this Report.

/ Solid Compliance Model in place and a robust corporate governance structure that ensures compliance with regulations, guidelines and best practices in this connection.

ⓘ More information in section *G1. Business conduct* of this Report.

Transition dimension Technology

Scenario

This scenario analyses how the Group's competitiveness might be affected by the development and use of new technologies that are less GHG-emissions intensive, considering their operating costs and the demand for our products.

Impact on business model

Stemming from the depreciation and liquidation value of assets, additional CapEx and increased raw materials costs.

Main mitigations

/ Innovation is an inherent and transversal value throughout the Inditex business model, which is why we collaborate with our suppliers and other organisations to find innovative solutions that may be applied throughout the value chain and life cycle of our products. The Inditex's Sustainability Innovation Hub is a clear evidence seeking to foster the circular economy, contribute to decarbonisation and maximise environmentally-friendly development.

ⓘ More information in section *E5-2. Actions related to resource use and circular economy* of this Report.

Transition dimension: Market

Scenario

This scenario envisages an increasing market interest in sustainable products and services. Potential changes in supply and demand patterns jeopardise the Group's market share and cost of capital.

Impact on business model

The demand impacts are expressed as the loss of earnings and/or failure to comply with growth targets. Investor sentiment translates into an increase in the cost of capital and in the cost of financing. The various emissions pathways determine the scale of these impacts.

Main mitigations

/ The Group's commitment to customers also implies anticipating their demands in diversity, sustainability or transparency matters, among others, while seeking to involve them in the efforts and progress that the Group makes around these issues.

/ Sustainability strategy with a focus on reducing the environmental impact through the Fibres Plan and Supply Chain Environmental Transformation Plan.

Transition dimension: Reputation

Scenario

This scenario considers a context with no progress towards a low-carbon economy, valuing the effects of public opinion, climate activism and investors' perceptions.

Impact on business model

The impacts on demand are materialised through the loss of earnings and/or failure to comply with growth targets. Market sentiment translates into impacts on the capital and financing costs.

Main mitigations

/ Inditex's Sustainability roadmap includes ambitious targets and actions aimed at achieving the long-term goal as a lever of transformation. The Group collaborates with all the actors in the value chain and with stakeholders to tackle global challenges from a holistic standpoint.

ⓘ More information in section *SBM-1. Strategy, business model and value chain* of this Report.

(1) The risk trend reflected here corresponds with the short term.

E1.IRO-1_14

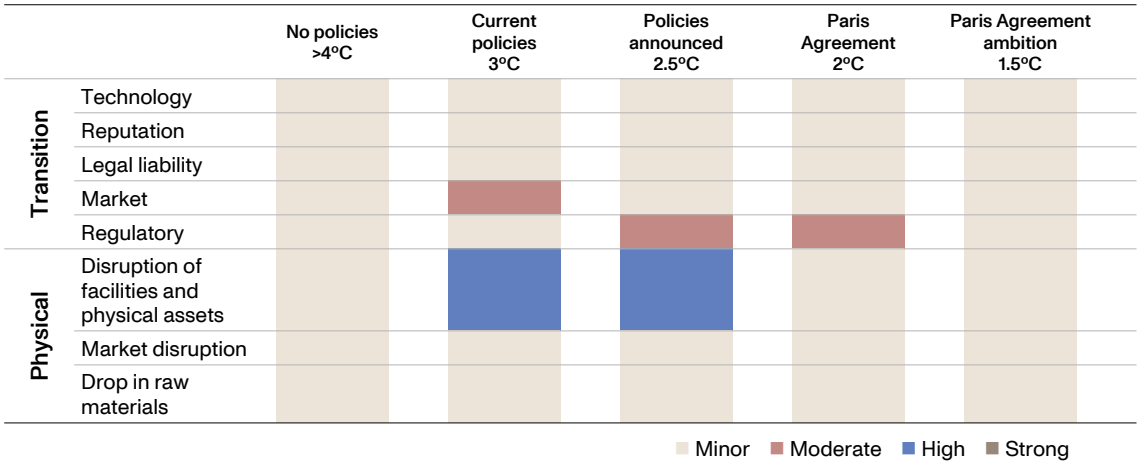
This analysis shows that none of the Company's activities or assets were found to be incompatible with the climate transition, or require significant efforts to guarantee that compatibility.

E1-9. Anticipated financial effects related to climate change

E1-9_08; E1-9_09; E1-9_29;

Based on our analysis of future climate scenarios, we obtained an estimate of the short- (0-5 years), medium- (5-10 years) and long- (more than 10 years) term physical and transitional climate-related risks[10]. The impact of each scenario represents a cash flow at risk deriving from each of the possible emissions pathways, adjusted by the scenario's probability of occurrence and without yet including mitigation measures.

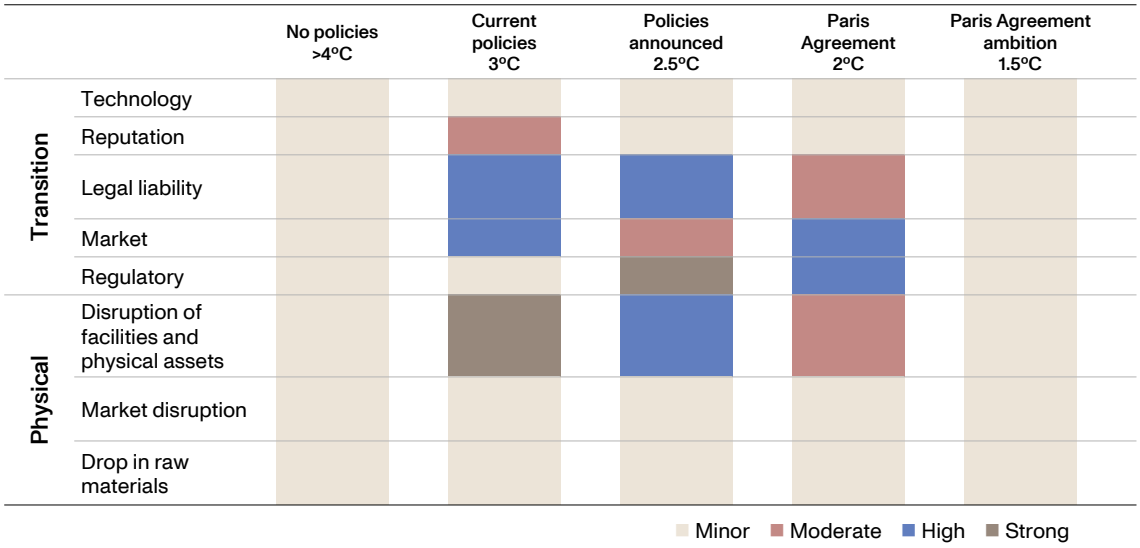
Short-term climate-related risk assessment (0-5 years)



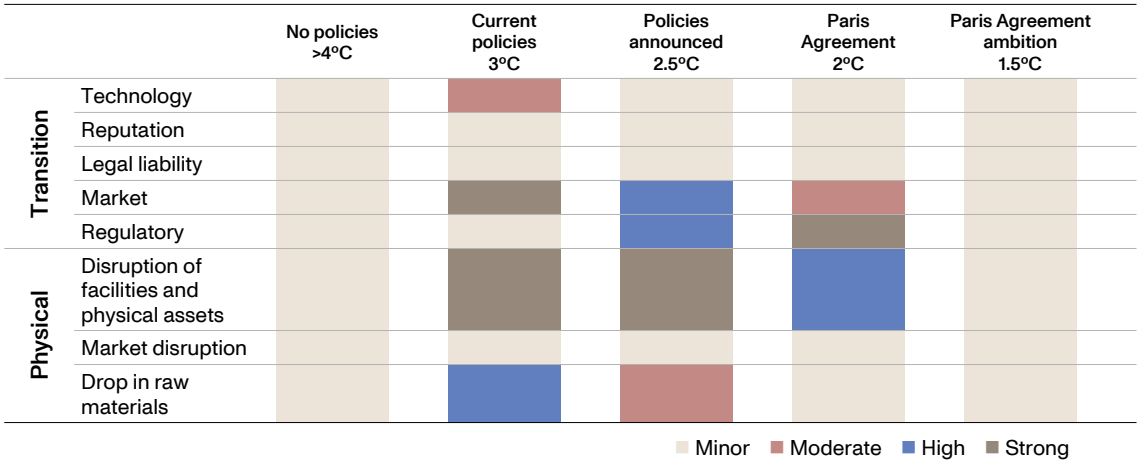
In the next five years, the financial impacts of physical risk are relatively limited to disruptions at key facilities, mainly throughout our value chain, in current policy pathways and announced policies. The probability that acute events could cause significant losses —'catastrophic physical tail risks'— remains low at present. The most impactful weather events for the Group are primarily heatwaves and drought or water stress, followed by coastal flooding.

[10] For the purposes of the materiality assessment, the time horizons of the climate-related impacts, risks and opportunities have been reconciled with those provided in ESRS 1.

Medium-term climate-related risk assessment (5-10 years)



Long-term climate-related risk assessment (+10 years)



E1-9_10;
E1-9_11;
E1-9_18;
E1-9_19

Our climate-related risk assessment methodology is based on that of the University of Cambridge's Centre for Risk Studies. Detailed information on this methodology, including the choice of time frames, climate scenarios and emissions pathways used and the model assumptions, among others, is provided in other sections of this Report:

ⓘ More information in sections *IRO-1/SBM-3. Material climate-related impacts, risks and opportunities* and *in the Methodological Annex* of this Report.

The identification and assessment of physical and transition climate-related risks are subject to numerous uncertainties, arising, among other things, from the complexity of anticipating how the climate may evolve. These uncertainties mean that the data contained in this report may be inaccurate in the future, depending on how the climate and the scientific consensus regarding the process of climate change evolve. Such data therefore represent the best estimate that can be made using existing climate information and models.

C. Impact, risk and opportunity management

E1-2. Policies related to climate change

E1.MDR-P_01-06; MDR-P_01; MDR-P_02; MDR-P_03; MDR-P_04; MDR-P_05

We have recently broadened our ambition by updating our Sustainability Policy and publishing our new Energy Policy -both approved in February 2025-, the latter being key to the development of responsible energy management and a greater capacity for climate change adaptation and mitigation.

We have also approved the new policies Water Policy and Ecosystems and Biodiversity Policy, which strengthen our transversal approach to climate change, acknowledging the need to protect and restore nature and all its resources to contribute to its mitigation.

Policies related to climate change

/ Energy Policy ⓘ
/ Sustainability Policy ⓘ
/ Ecosystems and Biodiversity Policy ⓘ
/ Water Policy ⓘ
/ Sustainability Stakeholder Relations Policy ⓘ

ⓘ More information on our policies and their updates in section *MDR-P – Policies* of this Report.

Energy Policy

Approved by the Board of Directors on 4 February 2025

Key contents	/ Commitment to promote responsible energy sourcing and management that contribute to reduce greenhouse gas emissions in our own operations and in the value chain / Complementary and additional measures to contribute to improve the integrity and resilience of energy infrastructure, as well as actions aimed at transformation
Scope	/ The entire Group (companies and individuals) / People who provide services or collaborate with the Group (including the Board of Directors) / It promotes the alignment of suppliers, factories along the supply chain and third parties engaged with the Group with the Policy
Accountable for the implementation	/ Sustainability department and its chief officer
Third-party standards	/ Paris Climate Agreement / Task Force on Climate-Related Financial Disclosures (TCFD)
Consideration given to stakeholders	/ Stakeholders' interests and concerns relating to energy were taken into account in developing the policy / Participation of the Social Advisory Board

E1-2_01

Our Sustainability Policy develops the Group's commitment to continuous improvement in **climate change adaptation and mitigation**, as well as our commitment to a fair transition.

This commitment is broadened and updated through our Energy Policy, which reinforces our initiatives to reduce GHG emissions, responsibly manage natural resources and work to transform the industry.

The Energy Policy underscores the role of promoting **energy efficiency** in our operations and value chain, allowing us to reduce our environmental footprint through operating efficiency. Accordingly, we propose strategies for monitoring energy consumption, increasing electrical and thermal efficiency to minimise energy losses and reduce the associated environmental impact by adopting innovative technologies and processes that optimise consumption, the application of best practices for design and construction and the adaptation of infrastructures.

Our Policy also emphasises the importance of **choosing the best energy sources**. This applies both to our operations and our value chain, structured through the supply of lower-impact electricity, and the transition towards alternative energy sources (such as renewable energy sources) and the gradual elimination of fossil fuels.

Moreover, we are also committed to contributing to **sector transformation**, through innovation and collaboration, thereby helping to effect systemic change. In this regard, we include benchmark standards in our analyses, such as the TCFD framework for climate-related risk assessment.

E1-3. Actions related to climate change

E1.MDR-A_01-12; E1-3_01

We continually strive to find solutions that reduce GHG emissions throughout our value chain, with the aim of reaching net-zero emissions by 2040. These efforts centre primarily on our Supply Chain Environmental Transformation Plan, our Fibres Plan, the launch of circularity and efficiency programmes, and the protection and conservation of ecosystems.

Our main measures this year, which we present below, evidence our efforts to mitigate the effects of climate change both at our own operations and in the rest of the value chain, in line with the goals established in our Climate Transition Plan.

ⓘ More information in sections *E1-1. Transition plan for climate change* and *E5-3. Targets related to resource use and circular economy* of this Report.

Initiatives in own operations

Lower-impact consumption

MDR-A_01; MDR-A_02; MDR-A_03; MDR-A_04; MDR-A_05; E1-3_03; E1-3_04

At our Company we are committed to generating and procuring energy from renewable sources to help us reduce our GHG emissions. In this section we present the most noteworthy actions of the year, in which we will continue to work going forward, in keeping with our commitments and targets provided in the Group's Climate Transition Plan. In 2024, we reduced more than 434,000 tonnes of GHG in our scopes 1 and 2 with respect to 2018, highlighting the importance of these initiatives in our own operations. We estimate that their implementation by 2030, together with other actions, will allow us to reduce 36,000 tonnes of GHG with respect to 2018.

Moreover, since 2022 we have fulfilled our goal of obtaining 100% of the electricity at our own facilities from renewable sources.

Self-consumption

Related IROs: [E1.I1; E1.I2; E1.R1]

Self-consumption means renewable energy produced on our premises or in nearby locations to meet our energy needs. To achieve this we use photovoltaic and wind power systems to generate renewable energy that helps reduce the environmental impact and GHG emissions associated with this electricity consumption.

In 2024 we have various active photovoltaic generation plants and a wind turbine generator that have a combined installed capacity of more than 5 MW and that produced 9,962 MWh of electricity.

Another notable self-consumption initiative is the development of the Outer Port Wind Facility in A Coruña in collaboration with the city's Port Authority, which will consist of the installation of various wind turbine generators with an installed capacity of 5.5-6 MW. Through this initiative, we aim to generate the renewable energy necessary to cover the annual electricity required by our headquarters in Arteixo, and, in addition, supply clean electricity to the port's own infrastructures. In 2024, the process of administrative and technical approvals necessary to obtain the required licences continued.

Fostering self-consumption —through the different projects included in this section— is aligned with the objectives of our Sustainability Policy and Energy Policy pertaining to the promotion of the efficient management of natural resources, especially energy, and to reducing their consumption and the associated impacts.

These actions will help us meet our target of tripling our current self-consumption capacity of renewable electricity at our headquarters, offices and own distribution centres by 2027, date when we estimate that around one-fourth of the electricity used by these facilities will be generated by self-consumption sources.

Power purchase agreements

Related IROs: [E1.I1; E1.I2; E1.R1]

MDR-A_01; MDR-A_02; MDR-A_03; MDR-A_05

In addition to implementing self-consumption initiatives, we promote the implementation of new renewable energy sources in our own operations through **power purchase agreements** (PPA), which are long-term agreements between energy consumers and producers.

These agreements enable producers to finance the construction of new renewable energy generation infrastructure, even when there are no incentives or subsidies. They are a way to facilitate the sustainable and long-term implementation of new projects.

At 2024, year-end, we have virtual power purchase agreements (VPPA) in place for periods of 10 and 12 years, with a total installed capacity of 136 MW. The related projects are in development phase, in some cases pending final approval, and will come on stream in 2025.

In 2024 we further developed our energy supply strategies, in particular boosting their alignment with solid criteria of respect for human rights. Consequently, we have established a set of aspects around three fundamental pillars: environmental impact, social implications and support for grid capacity and resilience. In total we have identified 15 criteria for contracting renewable energy projects, distributed in these three key categories, based on best practices, trends and current legislative requirements.

This action, continuously over time, is aligned with our target that, by 2027, 40% of our global electricity should be consumed through mechanisms that help develop additional capabilities, such as self-consumption, or signing new PPAs and VPPAs. By 2030 our goal is to reach 60%.

In line with the objectives of our Sustainability Policy and our Energy Policy, these agreements help promote new infrastructure to generate renewable energy that will allow to reduce the GHG emissions associated with their energy consumption.

MDR-A_04

These agreements allow us to consume renewable energy regardless of the location of our operations, while contributing clean energy to the grid. We aim to continue working in this sphere to generate new renewable energy capacity.

Energy attribute certificates

Related IROs: [E1.I1; E1.I2; E1.R1]

MDR-A_01; MDR-A_02; MDR-A_03; MDR-A_04; MDR-A_05

When we encounter limitations in the implementation of other mechanisms, we turn to alternatives such as green tariffs and energy attribute certificates.

These third-party-issued certificates evidence that a specified amount of electricity in our own operations was generated from renewable sources, reducing the volume of GHG emissions from our consumption with respect to the consumption of energy from conventional sources. With few exceptions, the renewable energy in the certificates we use is generated in the same electricity market where the electricity is consumed and the certificates are issued and redeemed as close as possible to the energy consumption period in which the instrument is applied.

With regard to the acquisition of certificates, we follow the guidelines established by benchmark organisations, such as CDP and RE100. In 2024, consistent with the previous year, more than 90% of the energy attribute certificates we acquired met these requirements.

This action is aligned with the objectives of our Sustainability Policy and Energy Policy in connection with promoting measures to reduce the environmental impact linked to GHG emissions generated by the production and consumption of energy.

ⓘ More information in section *E1-4. Targets related to climate change* of this Report.

Efficiency and optimisation initiatives

Efficiency on facilities: headquarters, own logistics centres, own factories and stores

Related IROs: [E1.I1; E1.I2; E1.R1]

Headquarters, own logistics centres and own factories

MDR-A_01; MDR-A_02; MDR-A_03; MDR-A_04

Energy efficiency is an ongoing action that helps us to control the consumption of resources with the aim of reducing and mitigating our impact on the environment. Hence, we make the necessary investments in our headquarters and platforms, and we promote best practices in our teams and processes.

Among these best practices is the application of bioclimatic and sustainable architectural criteria in the design and construction of our headquarters, as compared to conventional design and construction practices. In fact, since 2009 we have been certifying our flagship spaces in accordance with the most widely recognised sustainable construction standards, such as the LEED certifications developed by the US Green Building Council.

These initiatives allow us to promote energy savings —with the consequent reduction in GHG emissions—, optimise water use and responsibly manage construction materials and waste, among other criteria, in line with the main environmental objectives of our Sustainability Policy and our Energy Policy.

In 2024 we had two LEED Platinum, 11 LEED Gold, two LEED Silver, one LEED CI Certified and one BREEAM certification.

MDR-A_05

We also continue to certify our facilities in Spain to the ISO 50001 international standard, which distinguishes efficient and sustainable energy management processes. In 2024, our Central Services, CPD and the logistics platform in Arteixo, the logistics platform and CPD in A Laracha, Indipunt, the Europa logistics platform, the León logistics platform and the Meco logistics platform have all either renewed or obtained this certification.

Own stores

MDR-A_01; MDR-A_02; MDR-A_03

Energy Efficiency —consistent with the objectives of our Sustainability Policy and Energy Policy— and the implementation of best practices are also priorities in our physical and online stores.

Accordingly, we periodically review our standards to align them with best practices and implement new programmes for continuous improvement in the sustainability of our stores.

MDR-A_05

At present, seven stores have LEED Platinum certification, 28 have LEED Gold certification and one has BREEAM certification.

Also notable is that by the end of 2024, 83% of our own stores were connected to the central Inergy platform, which allows us to monitor and optimise energy consumption in order to boost energy efficiency.

MDR-A_04

By applying sustainable construction practices in our stores, we are able to optimise their energy consumption as compared with conventional design and construction practices.

Initiatives in supply chain

Supply Chain Environmental Transformation Plan 2024-2027

Related IROs: [E1.I1; E1.I2; E1.R1; E2.I1; E2.I2; E2.R1; E3.I1; E3.I2; E3.R1; E5.I1; E5.I2; E5.I3; E5.R1; E5.O1; E5.O2]

MDR-A_01; MDR-A_03; E1-3_03; E1-3_04

In accordance with Inditex's roadmap to sustainability and in line with our Sustainability Policy, in 2024 we have launched our Supply Chain Environmental Transformation Plan 2024-2027. This Plan is aimed at fostering the inclusion of environmental best practices and continuous collaboration with our suppliers.

The Plan outlines a series of measures to be phased in over the period, to help transform the textile industry through three lines of action:

/ Gradual increase in the minimum environmental requirements and standards.

/ Extension of the scope of application, adding environmental requirements also for dry processing facilities (spinning, weaving and sewing). Until now, its application was mainly for wet processing facilities.

/ Accompaniment through support and evaluation tools and technical support through specialist consulting.

This Transformation Plan is structured around **five priority environmental impacts**: water consumption, wastewater treatment, chemical products, waste management and carbon footprint. In this chapter we will concentrate on energy and reducing the carbon footprint.

The information on the remaining impacts is provided in the actions sections of the different disclosure requirements: wastewater treatment and chemicals (E2. Pollution), water consumption (E3. Water resources) and waste management (E5. Resource use and circular economy).

The Transformation Plan has been launched at all of the Group's suppliers and manufacturers. This year we also commenced the programmes to accompany our key suppliers and manufacturers. This accompaniment through support tools and technical backing will be gradually provided to our supply chain over the course of the Plan's period.

In 2024 we managed to reduce more than 560,000 tonnes of GHG in the goods and services category of our scope 3, with respect to 2018, thereby underscoring the importance of collaboration with our supply chain. We estimate that the consolidation of this initiative through 2030, along with other measures in our value chain, will allow us to reduce 4.9 million tonnes of GHG with respect to our 2018 emissions, in keeping with our SBTs.

MDR-A_02

Environmental requirements: more ambition for a lower impact

In order to promote not only the reduction of the environmental impact of our production, but also transform the textile industry, we will progressively increase the minimum environmental requirements that our suppliers and manufacturers must meet to be a part of our supply chain.

As these new requirements enter into force, they will be incorporated in our Green to Wear (GtW) standard. We have established a calendar for minimum requirements for the 2024-2027 period to enable our suppliers and manufacturers to plan and execute any necessary improvements.

The scope of the Transformation Plan increases the environmental requirements for mainly wet processing facilities — already included under the GtW standard— and gradually incorporates, from 2025 onwards, environmental requirements for dry processing facilities (spinning, weaving and sewing).

/ Carbon footprint

MDR-A_01;
MDR-A_02;
MDR-A_03;
MDR-A_04

The introduction of cleaner energy sources, along with the improvements in energy efficiency, are key to minimising GHG emissions associated with textile manufacturing processes. These measures are aligned with our Sustainability Policy and Energy Policy and help us comply with out targets of reducing our GHG emissions by 53% by 2030 as compared with 2018, and reaching net-zero emissions by 2040.

Accordingly, we have included in our GtW standard a new minimum requirement for manufacturers in our supply chain, who must design a **decarbonisation plan** that must be in the process of implementation in 2025. This plan should:

/ Meet a specific annual average carbon footprint reduction of at least 4.2%, considering scope 1 and 2 emissions as defined in the GHG Protocol.

/ Be updated in 2026 and 2027, in accordance with future benchmark values, specific to each type of facility, in which we are currently working.

/ Have a duration of at least one year; being recommended that it should entail longer-term actions with a more ambitious decarbonisation time frame.

/ Be ratified and signed by the management of each facility.

Furthermore, we continue to maintain the existing environmental requirements of our GtW standard, such as that no new coal-fired facility may join our supply chain, in line with our commitment to eliminate coal as an energy source.

MDR-A_04

Accompaniment: the key to transformation

At Inditex we implement a range of tools and initiatives to move forward in fostering environmental best practices and accompanying all the suppliers and manufacturers who show commitment to improvement.

Thus, we have four types of tools:

/ Monitoring and assessment tools

These tools focus on monitoring the supply chain and verifying that our mandatory standards are met. We highlight the role of environmental audits, which allow us to verify compliance with the GtW standard requirements across wet and dry processing facilities, and to introduce specific actions to continuously improve the environmental impact. They will be applied to dry processes over the course of 2025.

We have also launched a quarterly data collection portal to compile relevant information on production, such as water and energy consumption. Its purpose is to help these facilities to monitor the reduction of environmental impact reduction periodically.

ⓘ More information in section *G1-2. Management of relationships with suppliers* of this Report.

/ Diagnostic tools

We provide our suppliers and manufacturers with the tools to diagnose and monitor the environmental impact of the facilities in their supply chain.

These tools allow them to see their own performance diagnosis, showing their level of compliance with environmental requirements additional to minimum requirements through Inditex's suppliers portal

/ Supporting programmes

At Inditex we believe that responsible management of our supply chain implies accompanying our suppliers in improving their environmental performance. For this purpose, we have technical assistance and monitoring programmes, notably including:

- **Corrective Action Plans (CAPs):** for those instances in which breaches of the minimum requirements of our GtW standard are found. This programme accompanies and helps facilities to meet the minimum requirements so as to remain part of our supply chain.
- **Environmental Improvement Plans:** these are offered progressively to the facilities in our supply chain so that they can devise medium-term improvement plans for priority impacts. To devise these plans, we make available to key suppliers a technical support service through our teams and specialist consultants, to analyse the current status of their facilities and identify the action plans needed to meet the more stringent requirements defined.

ⓘ More information in section *G1-2. Management of relationships with suppliers* of this Report.

/ Best Available Techniques or BATs

Lastly, we have created a tool focused on supporting suppliers and manufacturers in our supply chain in implementing the best available techniques aimed at industrial manufacturing processes. This tool, made in collaboration with a network of experts and specialists, covers the best technologies and measures to reduce the impact in the various impact areas of the Transformation Plan. This is freely accessible and available for anyone interested via our corporate website.

In addition, facilities can access, among other issues, information on the investment needed, the expected effect of consumption reductions and even potential constraints in the implementation of the measures. The platform also provides information on the benefits of the proposed new technologies over conventional ones.

In connection with energy, it addresses and assesses topics like the regionally self-generation of renewable electricity, the signature of power purchase agreements (PPAs), the purchase of certified renewable energy from the grid, the monitoring of the consumption and energy optimisation of equipment and processes or the installation of heat recovery units, among others.

ⓘ More information on Best Available Techniques (BAT) on Inditex's corporate website.

MDR-A_06;
MDR-A_07;
MDR-A_09;
MDR-A_10;
MDR-A_11;
MDR-A_12;
E1-3_05;
E1-3_06

The financial resources allocated to the development of the actions carried out both in our own operations and in the supply chain do not represent a material amount in isolation and are accounted for as OpEx or CapEx depending on their nature (*Note 6.* Operating Expenses or *Note 14.* Property, plant and equipment of the Consolidated Annual Accounts), except for the existing vPPAs that are included in the Other Financial Assets item (*Note 26.* of the Consolidated Annual Accounts). Regarding self-consumption, as reflected in our EU Taxonomy section, throughout this year we have made an investment 2.3 million euros in the Outer Port Wind Facility in A Coruña, and another 1.4 million in photovoltaic installations at our centres in Laracha and Zaragoza (Spain). Both investments are accounted for as CapEx in Property, plant and equipment of the Consolidated Balance Sheet (see *Note 14.* of the Consolidated Annual Accounts). The Outer Port Wind Facility in A Coruña, is planned for launch in 2027 with an estimated investments of 34 million euros, which will be recorded under Tangible Fixed Assets on the Consolidated Balance Sheet as the project is executed.

In addition to these actions, we carry out other initiatives that contribute to our climate change targets, focused on both our own operations and the supply chain. These notably include:

- In 2023 we signed a multi-year collaboration agreement with Naturgy and EDAR Bens, the public company in charge of water treatment in the metropolitan area of A Coruña (Spain), to promote R&D work on biomethane (a renewable gas) production processes in the urban WWTP and food industry sectors as an alternative way of generating renewable energy. In 2024, 1,892 MWh of biomethane were generated, which were included in the commercial supply agreement for Inditex's facilities in Arteixo and A Laracha[11].
- This collaboration agreement has opened up avenues of research into the production of green hydrogen from the biogas generated by the plant and its possible injection into the existing natural gas network.

E1-3_05; E1-3_06; E1-3_07; E1-3_08

- Furthermore, in 2024 the Group has conducted an analysis of its accounting information in order to determine which activities are associated with those described in the Taxonomy in relation to each of the six targets. Hence, we ensure the transparency and accuracy of the data reported as per the requirements of Delegated Regulation (EU) 2021/2178 of the European Taxonomy Regulation. During the year, we have recorded CapEx of 411 million euros in environmentally sustainable activities, and 4,867 million euros in Taxonomy non-eligible activities.

It is important to note, as indicated in the section on the EU Taxonomy, that the Company's main activity —the distribution and sale of fashion items— is not included in the current regulatory framework.

ⓘ More information in section *Taxonomy* of this Report.

Agreements and collaborations

Beyond the framework of these actions, we collaborate with numerous organisations to address both the causes and the consequences of climate change.

In this regard, we have signed up to initiatives like the Fashion Industry Charter for Climate Action (FICCA), led by the United Nations Framework Convention on Climate Change (UNFCCC), the United Nations Business Ambition for 1.5º , and the Fashion Pact.

We have also established partnerships with small organisations and initiatives like Smart Freight Centre and Cargo Owners for Zero Emission Vessels (COZEV). With regard to the shipping and distribution of our products, we reached an agreement with Iberia and Repsol to pursue the supply of sustainable aviation fuel (SAF), setting ourselves the goal of using 5% of this fuel in Inditex's cargo flights from Madrid.

In 2024 we joined RE100, led by the Climate Group. Also, ahead of COP29, we signed the World Economic Forum and the Alliance of CEO Climate Leaders open letter calling on policy-makers and businesses to commit strategically and financially to net zero, recognising the need to work together for a just and equitable transition.

In addition, under our framework agreement with the International Apparel Federation, we collaborate with business organisations, brands and other players to drive the decarbonisation of global apparel and textile supply chains, including this year the launch of pilot programmes in Türkiye and Bangladesh.

D. Metrics and targets

E1-4. Targets related to climate change

E1.MDR-T_01-13

Our **Climate Transition Plan**, available on the Inditex corporate website, includes a series of targets for furthering our climate commitment, in line with the Paris Agreement ambition, which aims to cap the increase in global temperature at 1.5ºC above pre-industrial levels.

ⓘ More information in section *E1-1. Transition plan for climate change* of this Report.

[11] The biomethane is injected into the local network by our natural gas supplier, who delivers us the relevant certificates for its renewable origin. Since GHG Protocol does not presently recognise the use of these market mechanisms for scopes 1 and 3, we do not compute it in Inditex's corporate footprint, but we mention it as a project driven by the Group.

In addition, we have set targets for water consumption in the supply chain, use of lower-environmental-impact raw materials and circularity services that help us progress towards our goals of reducing emissions and fighting climate change.

ⓘ More information on our sustainability targets in section *SBM-1. Strategy, business model and value chain* of this Report.

Our climate targets in depth

• Science-based targets (SBTs)

MDR-T_01

Our emissions reduction targets are aligned with the Paris Agreement ambition. In this regard, we want to achieve net-zero GHG emissions in our entire value chain by 2040. Furthermore, by 2030 we aim to reduce our total emissions by at least 53%, including our own operations and the value chain.

Both targets are directly aligned with four of our main policies: the Sustainability Policy, the Energy Policy, the Water Policy and the Ecosystems and Biodiversity Policy. Specifically, with the commitments to preserve the environment, to consider the consequences of climate change and to implement continuous improvement measures to reduce greenhouse gas emissions.

MDR-T_02;
MDR-T_03;
MDR-T_05;
MDR-T_06;
MDR-T_07;
MDR-T_08;
MDR-T_13;
E1-4_01;
E1-4_02;
E1-4_03;
E1-4_04;
E1-4_15;
E1-4_16

Target: reach net-zero GHG emissions by 2040

Breakdown by scope

/ Reduce scope 1 and 2 GHG emissions by 95% by 2040

/ Reduce scope 3 GHG emissions by 90% by 2040

Target: reduce our total emissions by at least 53% by 2030

Breakdown by scope

/ Reduce absolute scope 1 and 2 emissions by 95% by 2030

/ Reduce absolute scope 3 emissions by 51% by 2030

	Base year	Current year	Target year	
	2018	2024	2030	2040
Total emissions (t CO_2eq)	10,528,872	9,962,965	4,941,090	1,028,108
Scope 1 and 2 (t CO_2eq)	495,584	60,912	24,779	24,779
Scope 3 (t CO_2eq)	10,033,288	9,902,054	4,916,311	1,003,329

MDR-T_10;
MDR-T_11;
E1-4_01;
E1-4_21;
E1-4_22

Our 2040 net zero emissions target and 2030 emissions reduction target have been approved by the SBTi, in accordance with this organisation's criteria and considerations for the 1.5ºC emissions pathway. This ensures that they are consistent with climate science consensus and the Paris Agreement ambition.

E1-4_01;
MDR-T_04

These targets affect both our own operations (scope 1 and 2) and our value chain (scope 3), regardless of their location. With regard to scope 2 emissions, these targets apply to market-based scope 2 emissions. For its part, scope 3 includes the following categories: purchased goods and services (category 1), fuel- and energy-related activities (category 3), upstream transportation and distribution (category 4), waste generated in our own operations (category 5), business travel (category 6), employee commuting (category 7), end-of-life treatment of sold products (category 12), downstream leased assets (category 13) and franchises (category 14).

MDR-T_08;
MDR-T_13

Thanks to our efforts within the framework of our Climate Transition Plan, in 2024 we reduced scope 1, 2 and 3 emissions by 5% of our SBT, as compared to 2018. In 2024, we launched our Supply Chain Environmental Transformation Plan 2024-2027, which will allow us to continue advancing towards our intermediate milestone of achieving a 20% reduction of emissions in all three scopes by 2027.

To achieve these targets, we have focused on the following commitments in key action lines with the ultimate aim of attaining net-zero emissions by 2040:

/ Use at least 90% of alternative fuels in maritime transport by 2025.

In the last few years we have worked with our logistics suppliers to promote this target. In this connection, we highlight the recent agreement with Maersk for the shipping company to use alternative fuels on its vessels, such as green methanol or second-generation biofuels.

/ Triple our current installed capacity of renewable energy generation in our central offices, headquarters and distribution centres by 2027.

We are committed to the generation and purchase of energy from renewable sources as one of the key mechanisms for reducing our GHG emissions. We therefore invest in generating renewable energy at our facilities. Specifically, we have facilities for the generation of photovoltaic and wind energy, as well as geothermal and solar thermal energy.

/ Ensure that 40% of our own global electricity consumption comes from self-consumption and other mechanisms such as power purchase agreements (PPAs) or virtual power purchase agreements (VPPAs) by 2027. And that at least 60% of that consumption comes from this kind of mechanism by 2030.

In addition to implementing self-consumption initiatives, we promote the implementation of new renewable energy sources through PPAs, which are long-term agreements between consumers and energy producers. Our energy sourcing strategy factors in considerations around improvements in environmental impact, along with respect for human rights and support for the capacity and resilience of the grid.

/ Eliminate the use of coal in our supply chain by 2030.

In line with our commitment to the UN Fashion Industry Charter for Climate Action, since July 2023 we do not accept new factories to our supply chain that use coal as an energy source, and we continue to work with our suppliers and manufacturers to reduce coal consumption in those facilities where it was already being used.

/ Use 50% renewable electricity in manufacturing processes in our supply chain by 2030, reaching 100% by 2040.

We want to promote the use of renewable energy in our supply chain, and to do this we work both individually with factories and suppliers through our Supply Chain Environmental Transformation Plan, and collaboratively with our stakeholders through industry partnerships.

MDR-T_03; MDR-T_09; MDR-T_12; E1-4_01; E1-4_18; E1-4_20; E1-4_21; E1-4_25

ⓘ More information in the *Methodological Annex* of this Report.

How we work towards our targets

Under our Transition Plan, we launch various initiatives, in accordance with various decarbonisation levers, to reduce our GHG emissions and thereby move towards attaining our targets.

E1-4_23

ⓘ More information in section *E1-1. Transition plan for climate change* of this Report.

E1-4_24

At Inditex, we take a comprehensive approach to climate change, analysing future climate scenarios and identifying the physical and transition risks, as well as associated opportunities to ensure a resilient short-, medium- and long-term strategy.

Based on our identification and assessment of climate-related impacts, risks and opportunities, we adapt our sustainability strategy, which is integrated into all our business areas.

ⓘ More information on the scenario analysis methodology in sections *IRO-1/SBM-3. Material climate-related impacts, risks and opportunities* of this Report.

E1-5. Energy consumption and mix

E1-5_01; E1-5_02; E1-5_03; E1-5_04; E1-5_05; E1-5_06; E1-5_07; E1-5_08; E1-5_09; E1-5_10; E1-5_11; E1-5_12; E1-5_13; E1-5_14; E1-5_15; E1-5_17; E1-5_18

Our Energy Policy aims to promote the sourcing and the responsible management of the energy consumed by Inditex's activities throughout our value chain, to improve control over resources and reduce the environmental impact.

Our global energy consumption includes energy consumed in:

/ Corporate headquarters and international offices.
/ Own logistics centres.
/ Own factories.
/ Own stores.

In 2024 our global energy consumption amounted to 1,670,262 MWh (6,012,942 GJ), of which 1,543,884 MWh came from renewable sources. This implies 27% reduction in relative energy consumption per square metre as compared with 2018 (in 2024, 636 MJ/m^2).

We also undertake to optimise our energy consumption and to use lower-impact energy sources, in line with our Climate Transition Plan.

ⓘ More information in section *E1-1. Transition plan for climate change* of this Report.

Energy consumption	2024	2023	2018 (base year)
Fuel consumption from coal and coal products (MWh)	0	0	0
Fuel consumption from crude oil and petroleum products (MWh)	21,633	12,621	18,267
Fuel consumption from natural gas (MWh)	97,288	96,130	131,011
Fuel consumption from other fossil sources (MWh)	0	0	0
Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources (MWh)	7,457	6,416	1,032,288
Total fossil energy consumption (MWh)	**126,377**	**115,166**	**1,181,566**
Share of fossil sources in total energy consumption (%)	**8%**	**7%**	**58%**
Consumption from nuclear sources (MWh)	**0**	**0**	**0**
Share of consumption from nuclear sources in total energy consumption (%)	**-%**	**-%**	**-%**
Fuel consumption for renewable sources including biomass (also comprising industrial and municipal waste of biologic origin, biofuels, biogas, renewable hydrogen, etc.) (MWh)	57	1,272	1,444
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	1,534,720	1,605,158	858,706
The consumption of self-generated non-fuel renewable energy (MWh)	9,107	11,015	2,542
Total renewable energy consumption (MWh)	**1,543,884**	**1,617,445**	**862,692**
Share of renewable sources in total energy consumption (%)	**92%**	**93%**	**42%**
Total energy consumption (MWh) [(1)]	**1,670,262**	**1,732,611**	**2,044,258**
Total relative energy consumption (kWh/m^2) [(1)]	**177**	**201**	**243**
Total relative energy consumption (Wh/€) [(1)]	**43**	**48**	**78**

[(1)] The values for the base year and the previous year were recalculated.

E1-5_20; E1-5_21

As defined by the statistical classification of economic activities of the European Union (NACE), our sector may be assigned to group '47.5 Retail sale of other household equipments in specialised stores', considered of high climate impact. Therefore, the total relative consumption provided is equivalent to consumption in sectors with a high climate impact.

To calculate total relative energy consumption (Wh/€) it has been used net sales obtained in 2024, as stated in *Note 4* to our Consolidated Annual Accounts.

E1-5_16

We have not generated any non-renewable energy over the course of the year.

E1-5_05; E1-5_16; E1-5_17

ⓘ More information in section *E1-3. Actions related to climate change* of this Report.

IE1-6. GHG emissions

E1-6_01; E1-6_03; E1-6_04; E1-6_07; E1-6_08; E1-6_09; E1-6_10; E1-6_11; E1-6_12; E1-6_13; E1-6_27

Below we present a breakdown of our absolute emissions by scope and category, in accordance with the GHG Protocol.

	Retrospective				Milestones and target years [1]			
	2024	**2023**	**2018 (base year)**	**Comparison (2024/2023 %)**	**2027**	**2030**	**2040**	**Target (2024/2018 %)**
Scope 1 GHG emissions								
Gross scope 1 GHG emissions (t CO_2eq)	59,572	49,686	76,136	20%	60,909	3,807	3,807	(22)%
Percentage of scope 1 GHG emissions from regulated emissions trading schemes (%)	-	-	-	-	-	-	-	-
Scope 2 GHG emissions								
Gross location-based scope 2 GHG emissions (t CO_2eq)	433,654	448,966	662,799	(3)%	NA	NA	NA	NA
Gross market-based scope 2 GHG emissions (t CO_2eq)	1,340	1,153	419,448	16%	335,558	20,972	20,972	(100)%
Scope 3 GHG emissions[2]								
C1. Purchased goods and services	6,696,995	7,102,152	7,264,232	(6)%	-	-	-	(8)%
C2. Capital goods	275,050	265,644	240,011	4%	NA	NA	NA	NA
C3. Fuel and energy-related Activities (not included in scopes 1 or 2)	42,536	36,576	140,189	16%	-	-	-	(70)%
C4. Upstream transportation and distribution	2,614,230	2,378,464	2,102,728	10%	-	-	-	24%
C5. Waste generated in operations	3,854	2,819	3,583	37%	-	-	-	8%
C6. Business travel	34,980	34,679	49,425	1%	-	-	-	(29)%
C7. Employee commuting	143,878	142,038	174,105	1%	-	-	-	(17)%
C11. Use of sold products	3,250,659	3,105,308	3,148,636	5%	NA	NA	NA	NA
C12. End-of-life treatment of sold products	236,398	225,882	180,123	5%	-	-	-	31%
C13. Downstream leased assets	0	256	0	(100)%	-	-	-	0%
C14. Franchises	129,183	125,012	118,903	3%	-	-	-	9%
Total gross indirect GHG emissions (scope 3) (t CO_2eq)	13,427,762	13,418,829	13,421,935	0%	8,026,630	4,916,311	1,003,329	0%
Total GHG emissions								
Total (location-based) GHG emissions (t CO_2eq)	13,920,988	13,917,482	14,160,871	0%	NA	NA	NA	NA
Total (market-based) GHG emissions (t CO_2eq)	13,488,674	13,469,668	13,917,519	0%	8,423,098	4,941,090	1,028,108	(5)%

[1] Emissions reported in the Milestones and Targets columns refer to the GHG emissions categories for which there are approved SBTs. More information in the targets section of this Chapter.

[2] Categories C8 (upstream leased assets), C9 (downstream transportation and distribution), C10 (processing of sold products) and C15 (investments), were analysed but not included in this inventory of GHG emissions. More information on the reasons for their exclusion can be found in the Methodological Annex of this Report.

In 2024, our GHG emissions were reduced by 5% compared to 2018, based on the emissions categories subject to our SBT targets. The scope 3 purchased goods and services category continues to have the greatest weight in respect of GHG emissions in our value chain. In this category, 38% of emissions correspond to the extraction of raw materials used in our products. In 2024, thanks to the progress of our Fibres Plan, we managed to reduce GHG emissions related to the extraction of raw materials by 21% compared to 2018. In addition, the gradual implementation of our Supply Chain Environmental Transformation Plan will allow us to continue making progress in reducing emissions associated with the production processes in this category.

Finally, during the year, we have managed to reduce our scope 1 and 2 emissions by 88% compared with 2018.

E1-6_18; E1-6_19; E1-6_21; E1-6_22; E1-6_23

As indicated in section **E1-3. Actions related to climate change**, in keeping with our ambition to optimise our energy management, we have entered into power purchase agreements (PPAs), whereby energy producers have access to financing to build new renewable energy generation infrastructure. In 2024, as these projects are yet underway, we have self-generated our electricity and used renewable energy certificates.

In 2024, more than 90% of these renewable energy certificates met the requirements of benchmark organisations such as the CDP. Of all the certificates used, 33% were bundled, and 67% were unbundled.

ⓘ More information in section *E1-3. Actions related to climate change* of this Report.

E1-6_30; E1-6_31

Our emissions intensity in 2024, and its evolution compared with the previous year and the base year, was as follows:

GHG emissions	2024	2023	2018 (base year)
Kg CO_2eq per m^2 (market-based scope 1+2)	6	6	59
Kg CO_2eq per m^2 (location-based scope 1+2)	52	58	88
g CO_2eq per € (market-based scope 1+2)	1.6	1.4	19
g CO_2eq per € (location-based scope 1+2)	13	14	28
g CO_2eq per € (market-based scope 1+2+3)	349	375	532
g CO_2eq per € (location-based scope 1+2+3)	360	387	542

E1-6_32; E1-6_33; E1-6_34; E1-6_35

To calculate the GHG emissions intensity in 2024, we used the total value of our net sales, as indicated in *Note 4* to our Consolidated Annual Accounts. No other revenues were considered that are excluded from the calculation of GHG emissions intensity.

ⓘ More information in *Note 4. Net Sales* of the Consolidated Annual Accounts.

E1-6_17; E1-6_28

Lastly, we have biogenic emissions from biomass combustion or biodegradation in scope 1 and 3. Specifically, in 2024, 20 and 445,969 tonnes of biogenic CO_2 in scope 1 and 3, respectively, were generated by the use of biofuels at some facilities.

How we calculate our emissions

E1-6_15; E1-6_25; E1-6_26

The Methodological Annex of this Report contains details about the methodology used to calculate the Inditex Group's GHG emissions, including the standards used, the scope, the gases considered and the nature of the data used, among other information.

ⓘ More information on the calculation methodology in the *Methodological Annex* of this Report.

The Inditex Group's scope 1, 2 and 3 GHG emissions have been verified independently, in addition to the verification of the information included in this Report by Ernst & Young in accordance with ISAE 3410 standard.

E1-6_02

As stated in our Consolidated Annual Accounts, and based on an analysis of the contractual arrangements that grant joint control, the Group classified its participation in the Tempe Group as a joint venture. Consequently, the Tempe Group's GHG emissions have been consolidated with the emissions of the parent company.

Therefore, the emissions of other participated companies non-consolidated in the Group's financial statements are not applicable, and therefore not disclosed in the table above.

ⓘ More information in *Note 1.* of the Consolidated Annual Accounts.

E2. Pollution

A. Impact, risk and opportunity management

IRO-1. Material pollution-related impacts, risks and opportunities

Identification of Impacts, Risks and Opportunities

E2.IRO-1_01

Based on the analysis of our activity, coupled with the materiality assessment and the views of our stakeholders, we compile a list of material pollution-related impacts, risks and opportunities[12].

In the process we have included the assessment of all our activities and those of our value chain, considering the various locations of the facilities, with the aim of identifying all the potential impact pathways.

The results of the assessment allow us to conclude that the pollution-related material impacts, risks and opportunities are linked to the activity of our value chain (mainly to those supply chain stages that involve wet processes, and the use and end of life of articles) and are immaterial in our own operations.

For the current year, in accordance with the transitional provision of the European Directive (CSRD), in the section 10.2 of ESRS 1, the information reported in this chapter in connection with the value chain is of qualitative nature only.

However, in order to broaden the information reported in future reporting periods, we are working to compile information on metrics related to pollution in our value chain.

Consultations with stakeholders

E2.IRO-1_02

Dialogue with stakeholders is a pivotal part of our materiality analysis, as previously detailed in this Report. Specifically, in 2024 we involved specialist organisations like Zero Discharge of Hazardous Chemicals (ZDHC) in our **double materiality assessment**.

Both in the materiality assessment as during the course of our activity, we work with specialist organisations that give us valuable insight into the possible impacts of our activity in terms of pollution. In this regard, we highlight our adherence to ZDHC.

This continuous engagement also allows us to develop new goals and actions linked to the proper management of our impacts, risks and opportunities.

[12] Pollution derived from greenhouse gas emissions is not included, as this is covered in standard E1 - Climate change.

E2.IRO-1_03

Material Impacts, Risks and Opportunities related to pollution

		TYPE (I/R/O)	PHASE OF THE VALUE CHAIN [1]	RELATED POLICIES
E2.I1	**Impact from the use of chemical substances**	I	/ Raw materials / Supply Chain [2] / Use and end of life	**Transversal policies:** / Sustainability Policy / Sustainability Stakeholder Relations Policy **Specific policies:** / Ecosystems and Biodiversity Policy / Energy Policy / Water Policy
E2.I2	**Possible emissions of other pollutants and microfibres**	I	/ Raw materials / Supply Chain / Use and end of life	
E2.R1	**Transition risks due to pollution**	R	/ Extended value chain	

[1] The extended value chain comprises the environment and the communities in which we are present even if they are not directly linked to our activity.

[2] Including the facilities mainly carrying out wet processes, as these are the ones that use chemical products, water and energy as the main inputs in their manufacturing processes.

ⓘ More information on our stakeholder engagement and our materiality assessment in sections *SBM-3. Material impacts, risks and opportunities* and *IROs. Disclosures on the materiality assessment process* of this Report.

E2-1. Policies related to pollution

E2.MDR-P_01-06

The principles enshrined in our policies are the foundation of initiatives to reduce the impact relating to pollution, and in particular to avoid the emission of substances of concern in the various stages of the value chain, most notably in manufacturing stages.

Policies related to pollution

/ Sustainability Policy ⓘ
/ Ecosystems and Biodiversity Policy ⓘ
/ Energy Policy ⓘ
/ Water Policy ⓘ
/ Sustainability Stakeholder Relations Policy ⓘ

ⓘ More information on our policies and their updates in section *MDR-P. Policies* of this Report.

Mitigation of negative impacts related to pollution

E2-1_01

In keeping with our **Sustainability Policy**, we are working to minimise the potential environmental impact generated in our value chain, affecting ecosystems, biodiversity and its environment, as well as people, ensuring compliance with applicable legislation.

ⓘ More information on the measures implemented to avoid pollution and mitigate its effects in section *E2-2. Actions related to pollution* of this Report.

In accordance with our **Water Policy,** we promote adequate wastewater management by improving treatment processes and minimising the water footprint in the value chain. Similarly, we foster measures to reduce potential emissions to soil and freshwater by substances such as nitrogen and phosphorous, from the supply chain and from consumers' domestic laundry. We also take into account possible microfibre shedding in manufacturing and domestic laundry, so we consider aspects relating to water when we design our products and processes.

Pollution derived from the manufacturing and processing of products represents a significant impact on biodiversity and, accordingly, on natural resources, the environment and people. That is why, in line with our **Ecosystems and Biodiversity Policy**, we are committed to:

/ Protection and improvement of fertile soil health.

/ Water quality and access.

/ Protection of biodiversity and promotion on regenerative practices, among other actions.

Furthermore, our **Energy Policy** also covers impacts on climate, air quality and the integrity of the ozone layer, due to their essential role in regulating the Earth's biogeochemical cycles and maintaining temperatures and radiation levels compatible with life.

Minimising the use of substances of concern[13]

E2-1_02

At Inditex we are fully committed to the safety of our articles. Consequently, in accordance with our **Sustainability Policy**, we work to prevent, reduce and eliminate discharges, with a particular focus on potentially hazardous chemicals that might be harmful either to the environment or to people, such as our customers and the supply chain workers.

In line with our **Water Policy,** we are also committed to reducing the impact of emissions and discharges of pollutants into water, including chemical substances. Accordingly, our Green to Wear standard includes requirements relating to the chemical management system (CMS) and production process control.

We also require our suppliers and manufacturers to adhere to the Manufacturing Restricted Substances List, of the Zero Discharge of Hazardous Chemicals (ZDHC) foundation prior to entering into a commercial relationship with us.

In addition, we have made available to the industry the programme The List, by Inditex through ZDHC's Gateway platform. This is a programme carried out in partnership with the chemical industry that includes a classification of chemical products to ensure the safety of the final garments and improve the discharge quality.

ⓘ More information on *The List, by Inditex* on Inditex's corporate website.

Prevention and limitation of the impact on people and the environment

E2-1_03

In line with our Sustainability Policy and in order to avoid pollution-related incidents and emergencies, we identify the main risks in both our own operations and those of the supply chain.

/ **Own operations**: our Environmental Management System, which is certified to ISO 14001 standard, identifies the potential risks in connection with pollution emergencies in terms of logistics facilities and headquarters. This system establishes environmental incident logs, procedural reviews and the deadlines for remediation and improvement, among others, so as to avoid incidents and preserve the environment.

/ **Supply chain**: we carry out environmental audits to verify compliance with our Green to Wear standard and we determine the suitable Corrective Action Plans (CAPs), helping our suppliers to remedy the non-compliances detected.

ⓘ More information on the initiatives carried out in the supply chain in section *G1-2. Management of relationships with suppliers* of this Report

Own standards and certifications

We continuously strive to ensure that the products we sell are safe for our customers, the people who make them, the local communities, our workforce and the planet. To achieve this, we have our **own specific** product and process **standards** that are of general and mandatory application to our entire supply chain, for all the articles we sell[14]. These standards go beyond the requirements of current international legislation and cover processes from design to manufacturing.

[13] The term 'substances of concern', used throughout this Report, also refers to those substances classified by the CSRD as 'substances of very high concern'.
[14] Articles that are outside the scope of Inditex's health and safety standards are subject to minimum requirement reports specifically compiled in accordance with the statutory requirements which apply to the type of product and the markets where they are sold.

In this regard, we have a number of standards focusing on managing chemical products in processes and articles, which we break down in detail below.

Standards linked to chemical safety

	Scope
Green to Wear	Manufacturing processes of textile and leather goods.
The List, by Inditex	Chemical products used in the production of garments, fabrics, footwear, accessories and home textiles.
Clear to Wear	Garments, fabrics, footwear, accessories and home textiles.
i+Cosmetics	Cosmetics.
i+Food Contact Materials	Products in contact with food.
i+Home Fragrances and candles	Home fragrances, candles and their accessories.

With regard to pollution, we highlight our Green to Wear standard, whose chemical management system (CMS) module for the management of chemical products requires suppliers to choose the most adequate chemical products to ensure safety from the outset of the production process. Associated with this programme, we also have The List, by Inditex, to guarantee the use of safe chemical products; and, lastly, our Clear to Wear standard, which focuses on the health and chemical safety of finished products in textile and leather articles, as well as other Inditex health standards that apply to other product types.

We also have other health and safety standards linked to the characteristics of each product type, outlined in section S4. Consumers and end-users.

ⓘ More information in section *S4-4. Actions related to consumers* of this Report.

/ Green to Wear (GtW) standard: environmental impact in manufacturing processes

In order to promote the reduction of the environmental impact of our supply chain, since 2014 at Inditex we have been implementing our Green to Wear standard. This is a key tool to apply best practice in those processes with the highest environmental impact, most notably in wet processes, and thereby to gradually reduce the environmental impact of our garments, by applying a principle of continuous improvement through evaluation, support and monitoring.

ⓘ More information in section *G1-2. Management of relationships with suppliers* of this Report.

/ Clear to Wear (CtW) standard: product health and chemical safety

Our Clear to Wear (CtW) standard incorporates the strictest global regulations on chemical substances in textile and leather articles. Likewise, it includes the European Union REACH law, which regulates the Registration, Evaluation, Authorisation and Restriction of Chemicals), as a mandatory EU regulation for all our suppliers.

In 2024 we launched a new version of the CtW standard to update it with the latest regulatory developments and to further our alignment with the Restricted Substances List (RSL) of the Apparel and Footwear International RSL Management (AFIRM) Group.

This standard is of general application and mandatory for all garments, footwear, home textiles, fabrics and leather supplied to Inditex, as well as for certain accessories, such as: handbags, belts, scarves, fashion jewellery and similar products.

/ i+Cosmetics and i+Food Contact Materials standards

In order to ensure an adequate response to the specific properties of the various product families —those in contact with food or cosmetics— at Inditex we have developed specific i+ standards. They include both the applicable health and safety parameters, and the documentary and best manufacturing practice requirements, as well the analysis protocols for establishing compliance with the provisions contained in the standards.

In the case of products that come into contact with food, our standard also restricts the transfer of their constituent chemical substances to the food they come into contact with.

/ Certified chemical products

Our environmental improvement strategy promotes the use of certified chemical products and makes this mandatory from 2026 onwards, allowing us to ensure the proper selection of products that do not contain or are low in substances of concern (SOCs), with a particular focus on substances of very high concern included in the formulation of chemical products used by the textile and leather industry.

These certifications include the most stringent level of ZDHC compliance —level 3— along with our **The List, by Inditex** programme, which is a part of the ZDHC —Chemical to Zero— strategy for more sustainable chemical products and is included in the Gateway platform as level 3 certification.

This programme consists of a procedure for classifying chemical products that improves production processes and the health and safety of garments, officially categorised by the ZDHC as Progressive level, in its fifth edition. We therefore provide our manufacturers and suppliers with a list of commercially available chemical products used in the manufacturing processes of textile and leather goods. This gives our manufacturers and suppliers key information with which to determine whether a chemical product meets the requirements of ZDHC's Manufacturing Restricted Substances List (MSRL), the Restricted Substances List (RSL) by AFIRM, and our own Clear to Wear standard.

In this programme, which was updated in 2023, chemical products are classified into a positive or negative list, with two categories ('A' and 'C') to distinguish products that are allowed in Inditex production processes, and those that are banned.

E2-2. Actions related to pollution

E2.MDR-A_01-12; E2-2_01

At Inditex, we implement a range of initiatives to prevent and reduce pollution throughout our own operations and in our value chain, both directly —by establishing restrictions on the use of chemical substances, or minimising microfibre shedding from our garments— and indirectly —by reducing energy and water consumption primarily in the production processes of our supply chain, among others—.

ⓘ More information in sections *E1-3. Actions related to climate change* and *E3-2. Actions related to water resources* of this Report.

Avoid pollution

MDR-A_01; MDR-A_02; MDR-A_03; MDR-A_04; E2-2_02

/ Supply Chain Environmental Transformation Plan 2024-2027

Related IROs: [E1.I1; E1.I2; E1.R1; E2.I1; E2.I2; E2.R1; E3.I1; E3.I2; E3.R1; E5.I1; E5.I2; E5.I3; E5.R1; E5.O1; E5.O2]

The Supply Chain Environmental Transformation Plan, due to its transversal nature, is detailed in standard E1. Climate change. The specific information on priority impacts can be found in the associated standards.

ⓘ More information on other related actions in sections *E1-3. Actions related to climate change*, *E3-2. Actions related to water resources* and *E5-2. Actions related to resource use and circular economy* of this Report.

Within the framework of the Plan, we have implemented the following initiatives linked to pollution-related priority impacts:

- **Wastewater treatment**

At Inditex we work to ensure the application of minimum requirements on discharge quality for all wet process facilities with direct discharge to the environment, in keeping with the water impact reduction goals of our Sustainability and Water Policy. To achieve this, we use the Zero Discharge of Hazardous Chemicals (ZDHC) Wastewater Guidelines, focused on improving the application of minimum discharge quality requirements in all manufacturing countries.

This allows us to progress in gradually reducing the values of the conventional parameters, heavy metals and the presence of chemical substances listed in both ZDHC Wastewater Guidelines and Manufacturing Restricted Substances List (MRSL).

In this regard, we have increased our minimum requirements so that all the wet processing facilities in our supply chain with direct discharge into the environment must reach the foundational level by July 2025, and progressive level by July 2026, in accordance with the provisions of the ZDHC Wastewater Guidelines. In addition, they must comply with applicable national and local discharge legislation.

In addition, within the framework of improvement tools, some of the main actions we recommend for improving wastewater management at a facility are the optimisation of their purification processes and the training of purification plant operators/ technicians, among others.

ⓘ More information on *Best Available Techniques (BAT)* on Inditex's corporate website.

- **Chemical products**

At Inditex we set up the ZDHC Roadmap to Zero programme as a tool for leading the improvement in managing chemical inputs. This initiative allows us to advance in the protection of workers in the supply chain, guarantee the safety of each article and protect the environment from substances of concern, in accordance with our Sustainability Policy.

This initiative applies to wet processing facilities. Furthermore, the scope of control is extended to cover the entire inventory of chemicals for manufacturing (dyes, pigments and ancillary chemicals used in textile manufacturing), except for commodities, cleaning products and products used to purify water.

The initiative involves including new minimum requirements for the management of chemical products in the **Green to Wear** standard. This includes a gradual increase in the minimum percentage of ZDHC level 3 certified product inventory in our facilities to 95% by 2026. Currently, all the products in the positive list (those classified as A) of The List, by Inditex programme are already ranked as level 3.

In addition, all inventoried chemical products that are not certified by ZDHC must be checked using the Group's chemical control methodology during their transition to achieving the 2026 goal.

With regard to the improvement tools, the main initiatives we advise for increasing the use of ZDHC certified level 3 chemical products at a facility are requiring from the chemical product manufacturers certification of their chemical portfolio, and the use of alternative certified chemical products. Likewise, we recommend using support tools such as the repository with the range of certified products, The List, by Inditex report, and the ZDHC gateway chemicals module.

In addition to the transversal implementation of the Environmental Transformation Plan, we have other actions, categorised according to their level in the mitigation hierarchy, mainly focused on **avoiding** and **reducing** pollution.

/ Compliance verification programmes: Picking, APPLABs, Minilabs and continuous improvement programmes: Root Cause Analysis (RCA)

Related IROs: [E2.I1; E2.R1]

MDR-A_01; MDR-A_02; MDR-A_03; MDR-A_04; MDR-A_05; E2-2_02

To verify compliance with the product chemical safety standards mentioned in the previous section, we continuously work with technology companies, research centres and laboratories of international reference to test that the standards are being properly applied. We also conduct our own programmes to analyse our articles, as well as inspections at manufacturing centres.

Moreover, we focus our efforts on ensuring compliance with our standards at every stage of the product: design, raw material selection, manufacturing processes, storage and distribution.

In this way, we contribute to our Sustainability Policy commitment of complying with the most stringent health and safety standards in developing new products, as well as reducing and eliminating substances of concern and other pollutants generated throughout the value chain.

Additionally, to advance compliance with our standards in these early stages of the product's life cycle, we have a network of in-house control laboratories to carry out preliminary tests in accordance with the most demanding international standards. This makes them a very effective tool for preventing non-conformities with our Clear to Wear and Safe to Wear standards at very early stages of manufacture, thereby minimising the risk of non-conformities, and their consequences, in finished garments.

- ***Picking***

This programme verifies that our products comply with the Group's health and safety standards, Clear to Wear (CtW) , and other Inditex product health standards that apply to other product types.

ⓘ More information in section *S4. Consumers and end-users* of this Report.

The programme identifies potential non-conformities, mainly by taking representative samples of production at supply chain facilities and an analysis conducted by external laboratories approved by our APPLABs programme. All our articles are technically assessed in terms of chemical and physical safety (risk assessment) and 100% of articles with risk-assessment are analysed to verify the product's compliance with our standards.

In 2024, a total of 67,562 Picking inspections were performed and 831,896 analyses and tests[15] were carried out (60,685 inspections and 821,934 analyses and tests in 2023) evidencing a high degree of initial compliance with our standards, of 98.4% (98.2% in 2023), with compliance reaching 99.4% in the case of chemical safety compliance. For those productions that were initially non-compliant, we apply recovery protocols that allow these products to be properly corrected, eliminating the presence of restricted substances and improving parameters such as colour fastness to achieve compliance.

- **APPLABs**

We have our **APPLABs** external laboratory approval programme for the analytical support network of the programmes of The List, by Inditex, Green to Wear (chemical products control) and the Picking programme in the CtW verification. This initiative ensures that the analysis process and the results provided by these external laboratories on our articles are accurate and consistent with the particularities of our model. This confidence is crucial because this information determines whether a production meets our standards.

In 2024, a total of 63 on-site audits were carried out at external laboratories and 62 comparison exercises, which involved analysing 7,823 samples (57 on-site audits, 47 comparison exercises and 6,821 samples in 2023).

- ***Minilabs***

In addition to these inspections, since 2017 we have been deploying **Minilabs** a portable laboratory that allows our external inspectors to conduct, at the supplier's own facilities and at any stage of the production process, up to six screening tests for substances and parameters regulated in the Clear to Wear standard and Physical Testing Requirements.

In 2024, we performed 3,283 Picking inspections with Minilabs and 28,933 analyses and screening tests (3,656 inspections and 31,268 analyses and tests were executed in 2023).

- **Root Cause Analysis (RCA)**

We also strive to improve the supply chain through our **Root Cause Analysis** (RCA), which enables us to conduct technical audits when we identify a non-compliance in the Picking programme. These audits, carried out by specialists, are aimed at finding the root cause of the non-compliance in wet process facilities —dyeing, washing, tannery and printing, primarily— and proposing corrective actions and recommendations to remedy the incident and prevent it from recurring.

In 2024 we carried out 31 RCA audits (36 audits in 2023). The results show that one of the main causes of non-compliance is cross-contamination with other productions. This programme allows us to generate and strengthen our expertise so as to be able to tackle and correct the causes of non-conformities and continue to improve our supply chain.

[15] This includes tests and inspections carried out in 2024 as part of the Picking programme for all the Group's brands. The calculation methodology includes primary data obtained through statements from the service provider and checked against the amounts invoiced by the laboratories in the monitoring controls of the allocated budget.

MDR-A_06;
MDR-A_07

The financial resources linked to the development of these actions are associated with operating expenses, which in isolation do not represent a material amount in terms of CapEx or OpEx. This amount is included under Operating Expenses in the Consolidated Income Statement (see *Note 6* to the Consolidated Annual Accounts).

Reduce pollution

As a complement to our actions, we also implement Research, Development and Innovation (R&D+i) initiatives, which allow us to move forward in our sustainability strategy and work to prevent and reduce pollution. In 2024, we highlight our initiatives linked to chemical products, along with the new ambition of our research programmes and adoption of new measures and technologies stemming from innovation.

Research, Development and Innovation (R&D+i) initiatives related to chemical products

/ R&D+I in analysis methodology:

We have developed different procedures to detect substances that might be potentially hazardous for users, reducing their impact and the associated emissions. These notably include:

- Study of formaldehyde emissions in wood materials.
- Development of a method of analysis to verify the presence of synthetic lipid antioxidants in leather.
- Comparison between methods to detect total fluoride in textile samples and chemical products.
- Study of the application of a hydrolysis-based method to detect the nature of PFAS and to help discriminate between intentional application and cross-contamination.

/ R&D+I in studies and projects:

- Study to find alternatives to sulphones and syntans in leather tanning.
- Study of the impact of finishing treatment on the pH of leather and its link to the tendency to form hexavalent chromium.

/ R&D+I in guides:

- Update of the best manufacturing practices guidelines for the use of safe chemical alternatives to PFAS and minimisation of cross-contamination.

ⓘ More information in the document *Innovation, Collaboration and Continuous Improvement for Chemical Safety* available on Inditex's corporate website.

/ Collaboration initiatives to implement measures and technologies derived from innovation

Related IROs: [E2.I1; E2.I2; E2.R1]

MDR-A_01;
MDR-A_02;
MDR-A_03;
MDR-A_04;
MDR-A_05;
E2-2_02

We take part in collaboration initiatives to implement different innovative measures and technologies, co-developed by the Group through industrial research partnerships with notable organisations such as BASF, CHT, Pulcra, EPSON, Jeanologia and DyStar, among others, that allow us to progress towards our goals, in keeping with our strategy and policies.

The aim of this innovation and development network is to demonstrate that new measures and technologies work on an industrial scale. At the same time, information is provided to carry out case studies to verify the improvements made, facilitating their implementation in other facilities.

Among the foremost research initiatives, in 2024 we highlight the following programmes: The Colouring by Inditex, linked to the wet processing impact; The Materials by Inditex, focusing on fibres and materials; and The Microfibers by Inditex, addressing the emerging challenge of microfibres.

We also have The Mill by Inditex, an initiative to accelerate the adoption of innovative technologies in dyeing processes that reduce our environmental impact, especially in connection with water and energy consumption and the chemical products used in these processes. This initiative, a pioneer in the industry and aimed at the transfer of disruptive technologies, looks forward to demonstrate the technological and economic viability of a net zero facility in terms of emissions, water, waste and microfibres. To achieve this, in 2024, we devised a theoretical model based on three core areas –chemicals, circularity and renewable electrification–. This year, in the pilot demonstrations we have included supplier installations in Morocco, which add to those already carried out in 2023 in Portugal and Türkiye.

Research programmes

/ The Colouring by Inditex

This is our strategic innovation programme linked to reducing the potential impact of wet processes, carried out in collaboration with renowned industrial organisations. Some of its most notable initiatives are:

- PIGMENTURA by CHT, an innovative dyeing solution that not only slashes water consumption by up to 96%, but also prevents microfibre shedding. This novel development, which is the result of our research partnership with CHT that commenced in 2020 and that has been awarded with German Ecodesing Award in the product category this year, is based on a pigment dye that does not require washing and drying processes, thereby reducing the energy needed to heat the water used in conventional production processes. This can save up to 60% of energy compared to other, continuous dyeing technologies.
- SUSTINERI COLORING by PULCRA, another innovative dyeing solution, in this case exhaustion dyeing, that reduces water consumption by up to 58%, prevents the release of microfibres and significantly reduces production times. This development arises through the research alliance with PULCRA and is based on the use of high-performance wetting and dispersing agents, designed to combine pretreatment and colouring operations in a single process.
- Circular Dyeing, focused on the circularity of dyeing systems, through the reuse of water, energy and chemicals in a closed-loop to improve the use of resources and reduce pollution.
- Another solution we have developed is SOKALAN by BASF for the implementation and optimization of the first industrial cold-wash system. This system enables a reduction in both temperature and the number of washing cycles, thereby decreasing water and energy consumption as well as the time required in the conventional production process.

/ The Microfibers by Inditex

We continued to work on a number of measures to prevent both synthetic and natural microfibre shedding, especially in stages of the value chain where this shedding and subsequent release into wastewater is particularly relevant, such as in wet processing. Among the main initiatives of the year was the implementation at suppliers of the first units of the AirFiberWasher, developed in partnership with the Spanish company Jeanología, which aims to help prevent the release of microfibres in domestic washing. Using an innovative, air-based technology makes it possible to remove, prior to selling textile articles, a large part of the microfibres that would otherwise be released later in domestic washing. Furthermore, this is achieved without increasing water and energy consumption or compromising the quality of the treated fabrics.

/ The Materials by Inditex

Our programme for the development of circular fibres and materials, with a lower environmental impact. More information in section *E5. Resource use and circular economy of this Report*.

MDR-A_06; MDR-A_07; E2-2_02

The financial resources linked to implementing these actions, which on their own do not imply a material amount, are included under Operating Expenses in the Consolidated Income Statement (see *Note 6* of the Consolidated Annual Accounts).

In addition to these actions, we develop other initiatives, such as compiling the **Clothes Caring Guide**. This guide offers our consumers tips for clothing care to help extend the life of the garments and reduce the environmental impact of garment care processes. This reduces wear and tear on clothing and the amount of water and energy consumed in washing and drying garments.

We also carry out projects to use organic or in transition raw materials, which avoid the use of pesticides and fertilisers that may pollute and degrade the soil. Furthermore, we invest in innovative agricultural projects that apply regenerative practices to preserve soil quality.

ⓘ More information in section *E4-3. Actions related to biodiversity and ecosystems* of this Report.

We also work to minimise the environmental impact from the use of our products and to lengthen their useful life. In this regard, it is worth highlighting our **The Laundry by Zara Home** detergent, designed to reduce microfibre shedding in washing and also reducing energy consumption. We therefore include innovation from our supply chain right through to

our customers, in line with our commitment to mitigate the Group's impact on the environment, especially to reduce the consumption of natural resources and pollution.

ⓘ More information in section *E5-2. Actions related to resource use and circular economy* of this Report.

Agreements and collaborations

As in previous years, we continue the collaboration with Zero Discharge of Hazardous Chemicals (ZDHC). This year we have taken an active part in the Technical Experts Team Chemical to Zero Progressive (CtZ-P) working group to define the Progressive certification framework and system for the Chemical to Zero roadmap, sharing our expertise and experience in the control of chemical products with The List, by Inditex programme. We are also involved in the AFIRM Group to reduce the use and impact of substances of concern for health and the environment through the creation of an industry RSL standard. We are members of the Board of ZDHC and the Management Committee of AFIRM.

Additionally, we design best manufacturing practice guidelines and provide regular training to our suppliers, especially those involved in wet processes. Thus, we continue to move forward in the proper selection, acquisition, handling, storage and use of chemical products.

B. Metrics and targets

E2-3. Targets related to pollution

E2.MDR-T_14-19; MDR-T_20; MDR-T_21; E2-3_01; E2-3_02; E2-3_03; E2-3_04; E2-3_09

As previously indicated, the impacts related to pollution have been identified in our supply chain and the end of life of our products. That is why at Inditex we do not have direct contribution targets.

However, we have launched a series of collaboration initiatives with our supply chain that are materialised through the establishment of targets related to climate, water consumption, wastewater treatment, chemicals, waste management and raw materials.

On the one hand, management of the air pollution generated in our supply chain is closely linked to climate change. In this regard, we have developed various commitments at Company level in relation to the climate, which are set out in the **Climate Transition Plan**.

In turn, through the **Supply Chain Environmental Transformation Plan**, we aim to reduce the environmental impact associated with textile manufacturing, and accordingly any air, water or soil pollution deriving from the production processes of our articles.

Lastly, the **Fibres Plan** contains goals linked to the use of lower-impact raw materials[16], which are also related to pollution management. Thus, the use of these fibres reduces the impact generated during the cultivation and sourcing stage, thereby easing the pressure on the soil and water, and also in the use and end-of-life phases.

ⓘ More information in the Supply Chain Environmental Transformation Plan (*E2-2. Actions related to pollution*), Climate Transition Plan (*E1-1. Transition plan for climate change*) and Fibres Plan (*E5-3. Targets related to resource use and circular economy*) of this Report.

E2-4. Pollution of air, water and soil

Emission of pollutants

E2-4_01

As previously stated, the impacts derived from pollutant emissions are located in different stages of our value chain, mainly in the manufacturing processes of our supply chain, but not in our own operations. However, it is not currently possible to quantify these significant emissions to air (not greenhouse gases), water and soil. The lack of robust information and estimation methodologies with firm and contrasted criteria in the textile industry also precludes making estimates based on scientific or proxy data.

[16] See the *Methodological Annex* for more information on the criteria that fibres and materials must fulfil to be classified as lower-impact.

We are working to compile this data and be able to disclose information in upcoming reporting periods.

Microplastics

E2-4_05

With regard to the potential generation and/or use of microplastics, it has been determined that the impacts identified in the double materiality analysis are located primarily in our value chain during the manufacturing processes and the use of our articles.

In this sense, we consider the applicable legal restrictions in connection with microplastics and we continue to seek alternatives in our articles.

At present, reporting information on microplastics and/or microfibres presents challenges such as the lack of a robust methodology in the industry to calculate these emissions, or the difficulty in obtaining the data from our value chain. Consequently, and considering the degree of uncertainty, no related metrics have been included.

In qualitative terms, we have estimated the Group's impacts derived from microfibre emissions at various stages of the value chain, also addressing their possible mitigation. In this regard, we aim to introduce possible improvements in the production processes of our articles, and during its use.

ⓘ More information in section *E2-2. Actions related to pollution* of this Report.

E2-4_08;
E2-4_09;
E2-4_10

Given how challenging it is to estimate the air, water and soil emissions derived from our supply chain, in the next few years we will work with reference organizations on defining the appropriate measurement criteria which, along with developments in the sector, we hope will enable us to report the related metrics and their evolution.

E2-5. Substances of concern and substances of very high concern

E2-5_01;
E2-5_02;
E2-5_03;
E2-5_04;
E2-5_05;
E2-5_06;
E2-5_07;
E2-5_08;
E2-5_09;
E2-5_10;
E2-5_11;
E2-5_12;
E2-5_13

Substances of concern can be harmful to the environment and people. These substances could be contained in the formulation of different chemical products that are used in certain processes, facilities and products in the supply chain. Accordingly, the safety data sheets (SDS) for chemical products indicates the presence of substances of concern generally above the concentration threshold of 0.1%.

Due to a limitation in the data provided by the manufacturers of chemical products on the formulated substances used in those products, it is not possible to confirm whether the absence of a substance is due to a concentration below these thresholds, or if it is not included in the formulation as an ingredient. Furthermore, there is a lack of homogeneous international requirements when it comes to the classification of substances and legal requirements on disclosure and SDS format, which affects traceability in the supply chain outside the European Union.

Consequently, we cannot quantify the volume of these substances generated and/or used to carry out our value chain activity. Neither is it viable to make science-based or proxy estimates due to the lack of truthful information and estimation methods with firm and contrasted criteria in the textile industry.

In this regard, we consider that the best way to avoid the presence of these substances in our products is by controlling the chemicals used in manufacturing processes. It is crucial that all the industries involved, including the chemical industry, work together to guarantee the availability of technically viable alternatives. Some of the **initiatives** we are currently carrying out, and which help minimise the use of these substances, are:

/ The List, by Inditex.

/ Manufacturing Restricted Substances List (MRSL) by ZDHC.

/ Green to Wear standard's chemical product management module.

/ Digitalisation of the chemical inventory.

/ Performance InCheck Report by ZDHC.

ⓘ More information on these initiatives in section *E2-1. Policies related to pollution* of this Report.

E3. Water resources

A. Impact, risk and opportunity management

IRO-1. Material water resources-related impacts, risks and opportunities

Identification of Impacts, Risks and Opportunities

E3.IRO-1_01

Based on the analysis of our activity, coupled with the materiality assessment and the views of our stakeholders, we identify a list of material water resources-related impacts, risks and opportunities.

In the process we have included the assessment of all our activities and those of our value chain, considering the various locations of the facilities, with the aim of analysing in detail the potential avenues of impact associated with the various river basins.

The results obtained allow us to conclude that the material water resources-related impacts, risks and opportunities are associated with our value chain, and are immaterial in respect of our own operations. Regarding value chain and in accordance with the transitional provision of the European Directive (CSRD), in section 10.2 of ESRS 1, the information reported in this chapter is subject to a progressive reporting timeline. However, mindful of our impacts and dependencies on water resources, for some years we have been reporting information on certain metrics relating to our supply chain (specifically, the relative consumption of wet process factories).

As a result of this materiality assessment, we have also found that our activities are not materially dependent on marine resources. With regard to the impacts on the marine environment, we have identified possible chemical substances and microfibre pollution, which we develop further in standard E2. Pollution; however, no other material impacts, risks or opportunities were identified. Consequently, we do not include details concerning marine resources in this standard.

ⓘ More information on identified impacts, risks and opportunities related to water pollution in section *E2. Pollution* of this Report.

Consultations with stakeholders

E3.IRO-1_02

Stakeholder dialogue is a key element of our materiality assessment, as detailed previously in this Report. Specifically, in 2024 we involved specialised organisations like Pacific Institute and ECODES in our **double materiality exercise.**

Both in the materiality assessment as during the course of our activity, we collaborate with specialised organisations that give us valuable knowledge regarding the impacts our activity might have on water resources. In this connection, we highlight our involvement in the United Nations' CEO Water Mandate initiative; and our membership of the Alliance for Water Stewardship (AWS).

This continuous engagement also allows us to develop new goals and actions linked to the proper management of our impacts, risks and opportunities.

Material Impacts, Risks and Opportunities related to water

		TYPE (I/R/O)	PHASE OF THE VALUE CHAIN [1]	RELATED POLICIES
E3.I1	**Water withdrawal**	I	/ Raw materials / Supply Chain [2] / Use and end of life	**Transversal policies:** / Sustainability Policy / Sustainability Stakeholder Relations Policy **Specific policies:** / Water Policy / Ecosystems and Biodiversity Policy
E3.I2	**Water discharge**	I	/ Raw materials / Supply Chain [2] / Use and end of life	
E3.R1	**Physical and transition risks related to water resources**	R	/ Extended value chain	

[1] The extended value chain comprises the environment and the communities in which we are present even if they are not directly linked to our activity.
[2] Including only facilities that carry out mainly wet processes, as these are the ones whose manufacturing processes use chemical products, water and energy as the main inputs.

ⓘ More information on our stakeholder engagement and our materiality assessment in sections *SBM-3. Material impacts, risks and opportunities* and *IROs. Disclosures on the materiality assessment process* of this Report.

E3-1. Policies related to water resources

E3.MDR-P_01-06; MDR-P_01; MDR-P_02; MDR-P_03; MDR-P_04; MDR-P_05

Our new **Water Policy** enshrines our commitment to water valuation, incorporating specific principles and lines of action for that purpose.

Similarly, we have broadened the vision through our Ecosystems and Biodiversity Policy in connection with water quality and health, and our Energy Policy due to its interrelation with energy consumption and wet processes.

Policies related to water

/ Water Policy ⓘ
/ Sustainability Policy ⓘ
/ Ecosystems and Biodiversity Policy ⓘ
/ Energy Policy ⓘ
/ Sustainability Stakeholder Relations Policy ⓘ

ⓘ More information on our policies and their updates in section *MDR-P. Policies* in this Report.

Water Policy

Approved by the Board of Directors on 4 February 2025

Key contents	/ Commitment to water valuation[1] across our own operations and the value chain / Minimising the water footprint impact; protecting, conserving and restoring ecosystems; promoting access to water, sanitation and hygiene; ensuring a good water governance and driving transformation at industry level
Scope	/ The entire Group (companies and individuals) / People who provide services or collaborate with the Group (including the Board of Directors) / It promotes the alignment of suppliers, factories along the supply chain and third parties engaged with the Group with the Policy
Accountable for the implementation	/ Sustainability Department and its chief officer
Third-party standards	/ Principles on valuing water of the UN High Level Panel on Water
Consideration given to stakeholders	/ The interests of and potential impacts on stakeholders relating to water resources were taken into account in developing the policy / Participation of the Social Advisory Board

[1] Information about its consideration and definition in the Group's Water Policy.

Water management

E3-1_01

Our Sustainability Policy features water as a key part of our environmental perspective, from both the standpoint of aquatic ecosystems and that of the use and pollution of natural resources.

This is further extended by our new Water Policy, which enshrines our commitment to water valuation. Its essential principles include minimising the water footprint impact through practices in our own operations and in the value chain — where the impacts identified in our materiality assessment are concentrated— introducing the implementation of responsible water management as one of the main action lines.

E3-1_02

/ Use and supply

We proactively collaborate to ensure sustainable water management in the regions where our supply chain operations take place, recognizing the importance of joint efforts in preserving the environmental quality of river and marine ecosystems.

Accordingly, our Water Policy includes lines of action associated with water use, such as the identification, assessment and management of material water-related impacts, risks and opportunities in the value chain, the prioritisation of using recycled water and alternative sources, and the reduction of water withdrawal and discharge by promoting technologies and practices for savings at every stage of the value chain. Likewise, we have introduced considerations linked to water supply, such as reducing its consumption in areas of high water stress.

Furthermore, in our Sustainability Policy and our Energy Policy, we underscore reducing water consumption in our industry as a means to reduce energy consumption, thereby acknowledging the direct link between managing water as a resource and climate change.

E3-1_03

/ Treatment

In line with the measures associated with water use and supply, in our Water Policy we undertake to explore innovative technologies in water treatment and reuse, which will allow us to prioritise the use of recycled water and the reuse of water in processes. This allows us to promote sustainable resource management, improving treatment processes and minimising our water footprint throughout the value chain.

E3-1_04

/ Pollution prevention

Through our policies we undertake to advance towards the prevention, reduction and elimination of discharges into water, with special attention to potentially hazardous chemicals and other pollutants or waste generated in the value chain. In this regard, we promote responsible practices for water withdrawal and discharge that positively impact water quality, and we undertake to consider potential pollution throughout the life cycle when designing products and processes, and to explore improvements in treatment technologies. This includes the deployment of action plans and targets for reducing the potential impact of the emission and discharge of polluting substances in the value chain.

E3-1_05

/ Lower-water-impact design

Within the framework of our strategy and progress towards a circular economy, we approach water management in a transversal way in every stage of the production chain, from design and selection of materials to manufacturing and distribution throughout the entire value chain.

In connection with water resources, this ambition is strengthened by our Water Policy, which establishes a commitment to consider water-related aspects in product design and production processes, including the assessment of water use and potential pollution throughout the life cycle, from the sourcing of raw materials and manufacturing, to use by consumers and end of life.

E3-1_06

/ Consumption in areas at water risk

Among the main lines of action included of our Water Policy, we specifically include reducing water consumption in areas of high water stress, for which purpose we establish a range of commitments associated with these areas. Notable among these are the ambition to establish contextualised water consumption reduction targets, based on geolocation and monitoring of the impact associated with the water footprint of the Group's suppliers and manufacturers operating in those locations. In addition, we support suppliers to implement regenerative practices, backing the value chain in the transition to more efficient water management systems that reduce water withdrawal and discharge, and to reduce consumption by implementing closed-loop water systems and regenerative practices, thus promoting long-term water availability in these regions.

We also align our commitment to the efforts of conservation, protection and restoration of freshwater and marine ecosystems through the CEO Water Mandate initiative, focused on preserving freshwater through collective action in highly water-stressed river basins.

E3-1_09

Initiatives linked to seas and oceans

Lastly, also within the framework of our commitment to the CEO Water Mandate initiative, we seek to carry out assessments to identify the critical areas in forested river basins, wetlands, oceanic areas and other relevant ecosystems, and to prioritize conservation and restoration actions to work towards the improvement and protection of the hydrosphere.

In this connection, at Inditex we support various projects linked to the protection of seas and oceans, that foster coordinated and collective action between key agents. These notably include the Fashion Pact, Alliance for Water Stewardship and Arctic Corporate Shipping Pledge (Ocean Conservancy).

E3-2. Actions related to water resources

E3.MDR-A_01-12

At Inditex we are aware of the critical importance of water for life and ecosystems and the challenges posed in terms of availability and quality. To address those challenges, we conduct out initiatives on our own and in partnership with our stakeholders to reduce our environmental impact, located primarily in our supply chain, and preserve ecosystems.

E3-2_03

Water withdrawal is one of our impacts in relation to this resource, especially important when it takes place in areas at high water risk. Consequently, we implement a water management strategy with two differentiated approaches: minimising our negative impacts —with an emphasis on our work relating to the framework of the Supply Chain Environmental Transformation Plan and the Green to Wear and Care for Water standards— and contributing to the positive impact, for example through our commitment to CEO Water Mandate.

/ Supply Chain Environmental Transformation Plan 2024-2027

Related IROs: [E1.I1; E1.I2; E1.R1; E2.I1; E2.I2; E2.R1; E3.I1; E3.I2; E3.R1; E5.I1; E5.I2; E5.I3; E5.R1; E5.O1; E5.O2]

To make progress in achieving of our sustainability targets, we have launched our Supply Chain Transformation Plan 2024-2027. It is structured around five priority environmental impacts: water consumption[17], wastewater treatment, chemicals, waste management and carbon footprint. In this chapter we will focus on water consumption. The information concerning the remaining priority impacts is provided in the various standards, and there is a more detailed description of the Transformation Plan in standard E1.

ⓘ More information in sections *E1-3. Actions related to climate change*, *E2-2. Actions related to pollution* and *E5-2. Actions related to resource use and circular economy* of this Report.

Water consumption

MDR-A_01; MDR-A_02; MDR-A_03; MDR-A_04

To foster reducing water consumption in the supply chain in keeping with our Water and Sustainability Policies and further our target, we have implemented the Care for Water (CFW) consumption standard. This standard provides benchmark values for water-intensive manufacturing facilities, which in turn are part of the Green to Wear (GtW) standard.

The CFW standard allows us to classify wet processing facilities by their water consumption levels and set minimum water management requirements for the 2024-2027 period.

From November 2024, wet processing facilities in our supply chain must have a water consumption level classified as '*good*' in accordance with the CFW standard. From July 2025 onwards, these facilities must attain a level of 'excellent' for optimal water consumption management. In this regard, the GtW Supporting Documents contain instructions for facilities to calculate their water consumption and their Care for Water target.

We also have support and accompaniment mechanisms that are a crucial part of the Transformation Plan. These include our Best Available Techniques (BAT) tool with detailed information on solutions for improving process optimisation and recipes for pre-treatment, dyeing and finishing; investment in new, more efficient machinery; and wastewater recycling for use in textile processes.

ⓘ More information on the *Best Available Techniques (BAT)* and *GtW Supporting Documents* on Inditex's corporate website.

[17] Throughout this Report, we use the term 'water consumption' to refer to all water withdrawal, including amounts returned to the aquatic environment, as this is the term most commonly used in the sector. For more details about the calculation methodology of the associated metrics, see the *Methodological Annex.*

In addition to this action, we also develop other environmental initiatives to address water-related impacts transversally. These include our initiatives aimed at preventing and mitigating pollution, associated with water quality.

ⓘ More information on collaboration initiatives in section *E2-2. Actions related to pollution* of this Report.

Commitment to valuing water in the value chain

In 2024 we have worked to foster water valuation in our value chain, from the supply of raw materials to the end product, introducing measures to minimise our water footprint and promote the responsible use of this essential resource.

Some examples of our collaborative initiatives for valuing water are:

- **Minimization of the water footprint:** collaboration with suppliers in the implementation of good practices in water usage, associated with our ⓘ Green to Wear standard. We also work on consumer awareness, with the creation of manuals that promote responsible water consumption among our clients (ⓘ Clothes Caring Guide).
- **Protection, conservation and restoration of ecosystems:** establishment of alliances for the restoration and conservation of hydrographic accounts (CEO Water Mandate, ⓘ WWF).
- **Promoting global and equitable access to water, sanitation and hygiene:** collaboration with stakeholders, civil society, manufacturers and suppliers to improve adequate hygiene conditions and access to drinking water (Water.org, ⓘ Workers at the Centre).
- **Drive for transformation and innovation:** improvement of production processes to reduce water consumption and minimise wastewater, such as the installation of closed circuit systems at dyeing plants (ⓘ Circular Dyeing).

Agreements and collaborations

We maintain various collaborations with organisations like the World Wildlife Fund (WWF), the CEO Water Mandate and the Alliance for Water Stewardship. We also work with Water.org to improve access to drinking water and sanitation for low income families in Bangladesh, Cambodia and India.

We also work with industrial partners to drive industry transformation through collaboration and science-based innovation. Our industrial research partners include industry leaders such as BASF, CHT, Pulcra, Jeanología, DyStar and others.

B. Metrics and targets

E3-3/E3-4. Water consumption and related target

Water consumption in our supply chain (entity specific information)

E3-4_01;
E3-4_11

The ESRS define water consumption as the amount of water withdrawn and not discharged back to the water environment: for example, evaporated water or water incorporated into articles. In our business, the amount of water consumed according to this definition is very low, since almost all the water withdrawn is discharged at the end of its use in our supply chain production processes, so it does not imply material consumption.

Therefore, relative to consumption, water withdrawal is the most representative metric of water-related impacts reported under the ESRS E3 standard in the textile sector. However, considering that the most commonly use term is water ‘consumption’, that is the term we use in this Chapter.

That said, it is worth noting that, as previously indicated, water consumption in our own operations is not material considering the nature of our activity. Water consumption is material at our value chain, specially at the production stage of our articles, in particular in wet processes —dyeing, washing, finishing and printing, among others—. Another relevant phase in this connection is raw material production, an area we are working on to provide more information in future reporting periods.

• Reduction in water consumption in the supply chain

E3.MDR-T_01-13; MDR-T_01

We work with our suppliers and the rest of the industry in adopting best available practices, particularly in connection with water management and improving discharge quality.

As part of our approach to water management, we have set ourselves the target of reducing relative water consumption in our supply chain by 25 % in 2025, as compared with 2020. The aim is also to reduce the emissions associated with managing, handling and heating water during manufacturing processes.

This target is related to our Sustainability Policy and our Water Policy. Specifically, with our commitment to taking into account the consequences of climate change, water management and biodiversity protection.

MDR-T_02; MDR-T_05; MDR-T_06; MDR-T_07; MDR-T_08; MDR-T_13; E3-4_01; E3-4_10

Target: 25% reduction of water consumption throughout the supply chain by 2025

	Base year	Current year	Target year
	2020	2024	2025
Water consumption (litres/kg garment)	101	78	76
Reduction percentage		22%	25%

E3-3_01; E3-3_03

This target allows us to directly address our progress in preventing, minimising and remedying impacts linked to our supply chain. This demonstrates our commitment to developing innovation-based initiatives, and in collaboration with our manufacturers, for a responsible water management.

ⓘ More information on these initiatives in section *E3-2. Actions related to water source* of this Report.

This target therefore helps us to transfer an effect to our supply chain that helps reduce the potential impact associated with water withdrawal, especially in water-stressed areas, by improving water management in the wet processes involved in making our products.

It also allows us to prevent associated risks, both physical —susceptibility to production disruptions associated with water scarcity— and in terms of transition —aligning ourselves with the regulatory changes linked to the topic—. This target applies to all geographies where our manufacturers' activities are carried out, being especially relevant in those locations deemed to be at water risk.

ⓘ More information on the scope, methodology and changes in the year in the *Methodological Annex* of this Report.

MDR-T_03; MDR-T_04; MDR-T_09; MDR-T_12; E3-3_08; E3-4_06; E3-4_07

Areas at water risk

To obtain the water necessary to carry out supply chain production processes, and given our global presence, our suppliers and manufacturers withdraw water from various river basins.

E3-4_02

We have located and assessed water-related impacts to which both our own operations and those of our supply chain are exposed. This allows us to identify potential risks linked to our operations, specifically whether our facilities or those of our supply chain are located in water stressed river basins.

Specifically, in our 2024 materiality assessment we analysed the location of our supply chain facilities in relation to water stressed areas. We thus found that Türkiye, Mainland China and Morocco are the main markets with wet processing facilities exposed to material water risk.

E4. Biodiversity and ecosystems

A. Strategy

IRO-1/SBM-3. Material biodiversity and ecosystem-related impacts, risks and opportunities

Identification of Impacts, Risks and Opportunities

E4.IRO-1_01; E4.IRO-1_02; E4.IRO-1_03

Based on the analysis of our activity, coupled with the materiality analysis and the views of our stakeholders, we compile a list of material biodiversity and ecosystem-related impacts, risks and opportunities.

In this process, we have taken the **LEAP approach** (Locate, Evaluate, Analyse and Prepare) as a reference, analysing the locations of our own facilities and those of our value chain and identifying the Company's connection to the natural resources needed to produce raw materials and other key value chain processes, as well as the impact and dependencies on nature.

In this regard, we acknowledge our dependency on nature's ecosystem services in order to be able to offer our products and services. The provision of ecosystem services depends on a healthy state of nature and, in some areas across our operational footprint and value chain, these services are sourced from areas where there is a loss of biodiversity and health of ecosystems as a result of various pressures.

The likely material dependencies on ecosystem services identified can be broadly grouped under water, soil and climate regulation in both upstream and downstream operations. However, no material dependencies on ecosystem services have been identified in relation to own operations, transportation and factories of our supply chain that do not perform wet processes.

E4.IRO-1_04

Our risk analysis also included the possible occurrence of systemic risks. In this regard, we have identified two potential risks associated with the collapse of ecosystems from an environmental point of view —unavailability of agricultural raw materials— and the disruption of the supply chain associated with the collapse of ecosystems —paralysis of manufacturing production— .

Consultations with stakeholders

E4.IRO-1_05; E4.IRO-1_06; E4.IRO-1_07

Stakeholder dialogue is a key element of our materiality analysis, as detailed previously in this Report. Specifically, in 2024 we involved specialist organisations like Conservation International in our double materiality assessment.

In addition to the materiality assessment, during the course of our activity we also work with specialist organisations that give us valuable insight into the possible impacts of our activity on ecosystems and biodiversity. We highlight our collaboration with leading organizations as the World Wildlife Fund (WWF), Conservation International and Canopy.

This continuous engagement also allows us to develop new goals and actions linked to the proper management of our impacts, risks and opportunities.

Material Impacts, Risks and Opportunities related to biodiversity and ecosystems

		TYPE (I/R/O)	PHASE OF THE VALUE CHAIN[1]	RELATED POLICIES
E4.I1	**Impacts related to the exploitation, degradation and disruption of ecosystems and natural resources**	I	/ Extended value chain	**Transversal policies:** / Sustainability Policy / Sustainability Stakeholder Relations Policy
E4.R1	**Physical and transition risks due to biodiversity and ecosystems**	R	/ Extended value chain	**Specific policies:** / Ecosystems and Biodiversity Policy / Water Policy

[1] The extended value chain comprises the environment and the communities in which we are present even if they are not directly linked to our activity.

ⓘ More information on our stakeholder engagement and our materiality assessment in sections *SBM-3. Material impacts, risks and opportunities* and *IROs. Disclosures on the materiality assessment process* of this Report.

Biodiversity-sensitive areas

E4.IRO-1_08; E4.IRO-1_14; E4.IRO-1_15; E4.SBM-3_01; E4.SBM-3_02 E4.SBM-3_03; E4.SBM-3_04

Our assessment identified certain of our own facilities located near biodiversity-sensitive areas, using indications provided in the IBAT tool. However, they correspond to stores, offices and distribution centres which do not have a material impact on biodiversity due to the profile of their operations.

This matches the results of our materiality analysis, which found that the main impact on biodiversity and ecosystems would be produced in our value chain, with no material impact being found in our own operations.

With regard to our value chain, we are in the process of compiling new information to supplement this report in subsequent years, in accordance with the transitional provision of the CSRD, in ESRS 1, section 10.2.

Occurrence and types of impacts

E4.SBM-3_06

The findings of our materiality assessment do not indicate the existence of impacts on endangered species by our own operations.

E4.SBM-3_05

However, we have identified a possible impact linked to the exploitation, degradation and disruption of ecosystems and natural resources in our value chain, the analysis of which we will develop further in future years.

E4.IRO-1_16

The results of our analysis affirmed the need to continue implementing mitigation measures, which we include in our Sustainability and our Ecosystems and Biodiversity policies, and enforce through the various actions we develop.

ⓘ More information in section *E4-3. Actions related to biodiversity and ecosystems* of this Report.

B. Impact, risk and opportunity management

E4-2. Policies related to biodiversity and ecosystems

E4.MDR-P_01-06

We have broadened our ambition when it comes to protecting biodiversity and ecosystems through the principles compiled in our new **Ecosystems and Biodiversity Policy**, which underpins our commitment in this respect, further supported by other core policies such as the Water Policy.

MDR-P_01;
MDR-P_02;
MDR-P_03;
MDR-P_04;
MDR-P_05;
E4-2_17;
E4-2_20

Policies related to biodiversity and ecosystems

/ Ecosystems and Biodiversity Policy ⓘ
/ Water Policy ⓘ
/ Sustainability Policy ⓘ
/ Sustainability Stakeholder Relations Policy ⓘ

ⓘ More information on our policies and their updates in section *MDR-P. Policies* in this Report.

Ecosystems and Biodiversity Policy

Approved by the Board of Directors on 10 September 2024

Key contents	/ Commitment to no deforestation, no degradation or no conversion of natural ecosystems, as well as to the betterment of biodiversity and the ecosystem health / Promotion of the balanced and sustainable management, preservation and recovery of ancient and endangered forests and other natural ecosystems
Scope	/ The entire Group (companies and individuals) / People who provide services or collaborate with the Group (including the Board of Directors) / Suppliers of product and non-product that supply materials, products or services that may pose a material risk, as well as their supply chain
Accountable for the implementation	/ Sustainability department and its chief officer
Third-party standards	/ Accountability framework / Conclusions of the Global Assessment Report on Biodiversity and Ecosystem Services issued by IPBES / The Kunming-Montreal Global Biodiversity Framework
Consideration given to stakeholders	/ Consultations throughout development with expert organisations such as the World Wildlife Fund (WWF), Conservation International and Canopy / Participation of the Social Advisory Board

E4-2_01;
E4-2_02;
E4-2_03

Through our Ecosystems and Biodiversity Policy, and the Sustainability and Water Policies, we establish the Company's principles and commitments in regard to the impacts relating to the exploitation, conversion and degradation of ecosystems and natural resources, and with dependencies on ecosystems and biodiversity, considering physical and transition risks deriving from them.

In this regard, we understand the relevance of comprehending the inter-relationship between the impacts, risks and dependencies, and the opportunities and best solutions to address them. This understanding is essential to tackle pressures leading to biodiversity loss and degradation of nature, such as climate change and pollution.

ⓘ More information in sections *E1. Climate change* and *E2. Pollution* of this Report.

With all this in mind, we design our roadmap and public targets.

E4-2_05;
E4-2_18

Furthermore, consistent with our policies, we endeavour to ensure the coexistence of productive uses and the protection of ecosystems and the environment. For example, by means of regenerative practices aimed at improving fertile soil health, water quality and supply, climate change mitigation, community welfare and biodiversity protection.

In this sense, we estimate that the most likely impact in terms of the conversion and degradation of natural ecosystems is connected to the processes of supply, production and transformation of raw materials and products. To address this, we advocate the following courses of action:

/ Refusal to use materials and products linked to deforestation, sourcing from primary and endangered forests and ecosystem conversion and degradation.

/ Sourcing of products, supplies and raw materials with lower overall impact.

ⓘ More information on regenerative agriculture in section *E5-2. Actions related to resource use and circular economy* and on lower-impact materials in section *E5-3. Targets related to resource use and circular economy* of this Report.

Accordingly, we have additional measures in place, such as collaboration and innovation initiatives in the fashion industry, in productive landscapes related to its procurement sources and other areas of the value chain and and the extended value chain. This is materialised in the following lines of action, among others:

/ Facilitate the transition to improved agricultural management systems.

/ Promote the development and implementation of technological innovations to reduce the environmental impact of products and activities in the value chain.

/ Participate in nature protection initiatives and promote regulation to protect and restore natural ecosystems.

ⓘ More information in the *Ecosystems and Biodiversity Policy*, available on Inditex's corporate website.

E4-2_19

Our policies also take into consideration the protection of oceans. Accordingly, we draw on our new Water Policy, in which we acknowledge the need to pay particular attention to impacts on the hydrosphere (which includes rivers, lakes, wetlands, aquifers and oceans), given its pivotal role as ecosystem services providers, such as the supply of water, the sustenance of biodiversity and their contribution towards mitigation and adaptation to climate change.

We therefore work with NGOs and local authorities in conservation and restoration projects that prevent further deterioration and improve the condition of bodies of water, identifying and prioritising critical areas, such as in initiatives like the Arctic Corporate Shipping Pledge and The Fashion Pact.

ⓘ More information in section *E4-3. Actions related to biodiversity and ecosystems* of this Report

E4-2_06

It is crucial to understand that the impacts on ecosystems and biodiversity also have a social dimension. That is why our policies acknowledge that progress in respect for **human rights** includes fostering the right to a clean, healthy and sustainable environment as a cornerstone of economic development, sustainability, social justice and well-being. We accordingly undertake to address these matters from a holistic perspective.

E4-2_04

Moreover, the Ecosystems and Biodiversity Policy, as part of its goal of reducing the pressures that endanger ecosystems and natural resources, proposes to advance in the **mapping and traceability** of the value chain. The aim is therefore to detect and monitor the evolution of impacts and better understand the local context to address them.

Evidence of our efforts is the improvement in the traceability of natural raw materials.

E4-3. Actions related to biodiversity and ecosystems

E4.MDR-A_01-12

At our Company we understand how important it is to preserve ecosystems to sustain society and life. That is why we are committed to protecting natural ecosystems in all areas of our value chain, but also wherever it is important for the well-being of communities and for biodiversity itself.

E4-3_01;
E4-3_13

Taking as a reference the AR3T framework (Avoid, Reduce, Restore & Regenerate, and Transform) proposed by the Science Based Targets Network (SBTN) and the Taskforce for Nature-related Financial Disclosure (TNFD), we implement a range of initiatives with a continuity perspective based on the principles of:



/ Avoid **/ Reduce** **/ Restore** **/ Regenerate** **/ Transform**

Avoid: thus preventing damage in the first place

We implement actions designed to avoid negative impacts on ecosystems of high biodiversity value, such as primary forests or the habitats of endangered species. In particular, we ensure that all forest raw materials we use —such as wood or pulp— come from certification programmes and initiatives that aim to ensure they are sourced from responsibly managed farming and not from primary and endangered forests. Thus, our paper or wood products and wooden furniture in our stores must be certified by the Forest Stewardship Council (FSC), Programme for the Endorsement of Forest Certification (PEFC) or FLEGT-licensed.

Moreover, we only work with suppliers of fibres derived from cellulose pulp that demonstrate their sourcing is free from primary and endangered forests, classified as 'green shirts' in the Hot Button Report by Canopy, an organisation we have been working with since 2014 to further primary and endangered forests protection.

We therefore undertake to avoid a possible effect on areas of High Conservation Value (HCV), the preservation of which is the basis of the certificates that we require.

This corporate responsibility is reinforced with the publication of our Ecosystems and Biodiversity Policy, which replaces the previous Forest Product Policy and broadens its scope.

ⓘ More information in our *Ecosystems and Biodiversity Policy*, and in the report *Ecosystems and Biodiversity Policy* Scope, available on Inditex's corporate website.

ⓘ More information in sections *E1-3. Actions related to climate change*, *E2-2. Actions related to pollution* , *E3-2. Actions related to water resources* and *E5-2. Actions related to resource use and circular economy* of this Report.

Reduce: how we minimise our impact on biodiversity

E4-3_14

After avoiding negative impacts from occurring, our next focus is to reduce the impacts in biodiversity that might arise as a result of our activity.

In this sense, we implement decarbonisation initiatives in our value chain, as well as reducing the impact of pollution and optimising water consumption in our supply chain. Notable among these is the **Supply Chain Environmental Transformation Plan 2024-2027.**

In addition, we work continuously on innovation in materials and processes to reduce their impact on the environment and people, within the framework of our **Fibres Plan**, and in particular in the Cotton Strategy. In this context, it is noteworthy the work developed by the Sustainability Innovation Hub.

ⓘ More information in sections *E1-3. Actions related to climate change*, *E2-2. Actions related to pollution* , *E3-2. Actions related to water resources* and *E5-2. Actions related to resource use and circular economy* of this Report.

Restore: we support the conservation, protection and restoration of ecosystems and biodiversity

E4-3_15;
MDR-A_01;
MDR-A_02;
MDR-A_03;
MDR-A_05

Related IROs: [E4.I1; E4.R1]

We continuously work with various organisations to foster restoration, protection and other forms of improvement through projects such as:

/ The restoration of the forest landscape in Mexico, improving forestry management in harmony with biodiversity in China, and promoting coexistence with wildlife in Brazil and Bolivia in partnership with WWF.

/ The contribution to the implementation of a cross-border collaboration initiative to protect and restore ecosystems and community resilience in India, Bhutan, Nepal and Bangladesh through the Mountains to Mangroves initiative led by Conservation International.

/ The promotion of sustainable forestry in Spain and Portugal in collaboration with the Galician Forestry Association and the Portuguese Forestry Association (Forestis).

/ Monitoring and restoration work with the Brazilian organisation SOS Mata Atlântica, to prevent the degradation of the Atlantic Forest.

/ Fostering coordination among global seed banks in partnership with Kew Gardens to resolve the issue of the lack of seeds for restoration efforts.

In 2024, we achieved the milestone of 622,878 hectares in the process of restoration or restored, 352,484 hectares more than in 2023, through various initiatives carried out globally in our supply chain and, mainly, in the areas and communities where we are present, even if they are not directly linked to our activity.

MDR-A_06; MDR-A_07; MDR-A_09; MDR-A_10; MDR-A_11; MDR-A_12

In 2024 we allocated 7.2 million euros to their implementation, included under Operating expenses in the Consolidated Income Statement (see *Note 6* to the Consolidated Annual Accounts) and part of the #BRINGYOUROWNBAG (#TRAETUBOLSA) initiative.

ⓘ More information on the initiative #BRINGYOUROWNBAG in section *S3-4. Actions related to communities* of this Report.

Regenerate: revitalising soils and ecosystems to sustain communities and biodiversity

Related IROs: [E4.I1; E4.R1]

MDR-A_01; MDR-A_02; MDR-A_03; MDR-A_04; MDR-A_05; E4-3_15

We also promote **regenerative agricultural and land management practices** aimed at fostering a balance between productive land use and healthy ecosystems. These initiatives, which we develop continuously, promote the preservation of nutrients in the soil and enhance its capacity to absorb carbon, positively addressing climate change, as well as improving water management and quality, the conservation of local biodiversity and the resilience of local communities. It is worth underscoring:

/ Fostering regenerative practices in cotton growing in India and Pakistan, in collaboration with Organic Cotton Accelerator (OCA).

/ Support for the transition to regenerative practices in India, fostering communities' resilience in collaboration with Action Social Advancement (ASA), the Laudes Foundation, IDH - the Sustainable Trade Initiative and WWF India.

/ Investment through the Regenerative Fund for Nature alongside Conservation International and the Kering Group to implement regenerative approaches in farming communities in Argentina and South Africa.

As a result, in 2024, we reached 135,656 hectares in the process of regeneration or regenerated, 10,942 hectares more than in 2023, through various initiatives carried out globally in our supply chain and other surrounding or related areas.

MDR-A_06; MDR-A_07; MDR-A_09; MDR-A_10; MDR-A_11; MDR-A_12

In 2024 we allocated 6.2 million euros to the implementation of this action, included under Operating Expenses in the Consolidated Income Statement (see *Note 6* to the Consolidated Annual Accounts) and part of the #BRINGYOUROWNBAG (#TRAETUBOLSA) initiative.

ⓘ More information on the initiative #BRINGYOUROWNBAG in section *S3-4. Actions related to communities* of this Report.

Transform: key to protecting biodiversity in the long term

E4-3_15

The transformation of production processes is essential to preserve ecosystems and biodiversity. This is why we support initiatives aimed at driving this transformation, in particular through coordinated and collective action between key agents.

ⓘ More information in the document *Partnerships* available on Inditex's corporate website.

E4-3_10

Our projects to protect biodiversity and ecosystems mainly involve the following stakeholders:

/ **Environment:** we involve organisations that represent it in the design of our strategies and implementation of our actions, especially those focused on having a positive impact on the environment and biodiversity.

/ **Suppliers:** given that our impacts on biodiversity and ecosystems concentrates in our value chain, the commitment of all actors involved is key to attaining our goals. In this regard, we work with our suppliers to incorporate best practices.

/ **Communities:** in keeping with our goal of contributing to the development of a fair and resilient society and a healthy environment underpinning it, our programmes are aimed at preserving and restoring nature while respecting the rights and well-being of local communities.

ⓘ More information in the *MDR-P. Policies* section of this Report.

E4-3_02

Furthermore, no biodiversity offsets have been used in relation to our actions.

Agreements and collaborations

With the aim of promoting the conservation of ecosystems and biodiversity, we work with a number of specialist organisations and coalitions such as Business for Nature, Open Planet Business for Biodiversity (OP2B), LEAF Coalition and The Fashion Pact, among others.

In this regard, it is worth underscoring our adherence to Deforestation-Free Call to Action for Leather, led by Textile Exchange and the Leather Working Group (LWG), which promotes supply chains that only use deforestation-free leather, and the Pack4Good initiative driven by Canopy to transform the procurement of packaging materials.

ⓘ More information in the document *Partnerships* on Inditex's corporate website.

C. Metrics and targets

E4-4. Targets related to biodiversity and ecosystems

E4.MDR-T_01-13

Our commitment to biodiversity and ecosystems is evidenced by our intention of acting to **protect, restore, regenerate or otherwise improve** biodiversity across five million hectares throughout our value chain and beyond.

Other related commitments, such as GHG emission reduction and climate neutrality targets, are also worth highlighting, given the impact of climate change on natural ecosystems. In addition, the responsible management of natural resources allows us to reduce our environmental impact. Consequently, in keeping with our Fibres Plan, we foster the use of lower-impact fibres and materials[18].

We have also set ourselves the target of a 25% reduction in water consumption in our supply chain by 2025, in line with our Water Policy, as we are mindful of how important water is for biodiversity and ecosystems.

ⓘ More information in sections *E1-4. Targets related to climate change*, *E3-3/E3-4. Water consumption and related target* and *E5-3. Targets related to resource use and circular economy* of this Report.

[18] See the *Methodological Annex* for more information on the criteria that fibres and materials must fulfil to be classified as lower-impact.

- **Protect, restore or regenerate five million hectares**

MDR-T_01

Our key commitment in connection with biodiversity and ecosystems is to protect, restore, regenerate, or take other management approaches for the improvement of biodiversity in an area of five million hectares.

This target is linked to our Sustainability Policy and, more specifically, to our Ecosystems and Biodiversity Policy. They both establish our commitment to the protection of ecosystems and biodiversity —in turn aligned with our pledge to contribute to the development of a fair and resilient society and a clean, healthy and sustainable environment that sustains it-.

MDR-T_02;
MDR-T_07;
MDR-T_08;
MDR-T_13

Target: protect, restore or regenerate 5 million hectares by 2030

	Current year	Target year
	2024	2030
Hectares	758,534	5 million

MDR-T_11

To achieve this target, we collaborate with expert organisations such as the World Wide Fund for Nature (WWF) or Conservation International in the various initiatives to regenerate and restore ecosystems detailed in this standard.

MDR-T_10;
E4-4_06;
E4-4_09

This target, along with the actions for achieving it, addresses the protection and improvement of biodiversity and ecosystems, both within and beyond our value chain, as part of the 'Restore & Regenerate' category of SBTN's action framework, adapting the mitigation hierarchy. We defined this target being aware of the impacts of our activity on the environment and our will to positively contribute to its recovery.

E4-4_05

Furthermore, it is in line with the goals of the European Union Biodiversity Strategy for 2030 and the Kunming-Montreal Global Biodiversity Framework.

MDR-T_03;
MDR-T_04;
MDR-T_05;
MDR-T_06;
MDR-T_09;
MDR-T_12;
E4-4_01;
E4-4_02;
E4-4_03;
E4-4_04;
E4-4_07;
E4-4_08

ⓘ More information on the scope, methodology and calculation changes in the year in the *Methodological Annex* of this Report.

E4-5. Metrics related to biodiversity and ecosystems change

E4-5_01;
E4-5_02

As previously mentioned, our materiality assessment identified certain of our own facilities located near biodiversity-sensitive areas. Nevertheless, we have not found any material negative impacts in those areas.

ⓘ More information in section *IRO-1/SBM-3. Material biodiversity and ecosystem-related impacts, risks and opportunities* of this chapter.

E4-5_04

However, we have identified potential impacts related to our value chain. Consequently, at Inditex we are in the process of compiling new information to supplement the measurement of this impact in our reporting for subsequent years, in accordance with the transitional provision in the CSRD, in ESRS 1, section 10.2.

E5. Resource use and circular economy

A. Impact, risk and opportunity management

IRO-1. Material resource use and circular economy-related impacts, risks and opportunities

Identification of Impacts, Risks and Opportunities

E5.IRO-1_01

The analysis of our activity, coupled with the materiality assessment and the views of our stakeholders, has allowed us to compile a list of material impacts, risks and opportunities related to resource use and circular economy.

In the process we have included the assessment of all our activities and those of our value chain, considering the various resource inflows and outflows at each stage, with the aim of identifying all the potential avenues of impact.

To understand the results of the exercise, it is important to take into account two considerations:

/ In general, purchases of raw materials and fabrics is not part of Inditex's own operations. However, we do take part in the selection of the raw materials used to manufacture our articles, as well as in the specifications of their characteristics. Accordingly, when it comes to the use of resources, the associated impacts, risks and opportunities are mainly concentrated on our value chain.

/ Waste management and outflow is generally focused within the scope of waste generated in our own operations.

Consultations with stakeholders

E5.IRO-1_02

Stakeholder dialogue is a key element of our materiality analysis, as detailed previously in this Report. Specifically, in 2024 we involved specialised organisations such as the University of Leeds in our **double materiality assessment.**

As well as in the materiality assessment, during the course of our activity, we also collaborate with specialised organisations that give us valuable knowledge regarding the impacts our activity might have on resource use and circular economy. Among these, we highlight our involvement with standard-bearing organisations in circularity, in terms of both lower-impact fibres and materials (Textile Exchange and Canopy, as well as many others) and packaging (Ellen MacArthur Foundation).

This continuous engagement also allows us to develop new targets and actions linked to the proper management of our impacts, risks and opportunities.

Material Impacts, Risks and Opportunities related to resource use and circular economy

		TYPE (I/R/O)	PHASE OF THE VALUE CHAIN[1]	RELATED POLICIES
E5.I1	**Possible impact from the use of conventional raw materials**	I	/ Raw materials	**Transversal policies:** / Sustainability Policy / Sustainability Stakeholder Relations Policy **Specific policies:** / Ecosystems and Biodiversity Policy
E5.I2	**Circularity**	I	/ Value chain	
E5.I3	**Waste generation**	I	/ Own operations / Value chain	
E5.R1	**Transition risks due to the use of resources and the circular economy**	R	/ Extended value chain	
E5.O1	**Opportunity for new business models** (e.g., Zara Pre-Owned)	O	/ Own operations	
E5.O2	**Opportunity to improve efficiency in the consumption of natural resources**	O	/ Own operations	

[1] The extended value chain comprises the environment and the communities in which we are present even if they are not directly linked to our activity.

ⓘ More information on stakeholder engagement and our materiality analysis can in sections *SBM-3. Material impacts, risks and opportunities* and *IROs. Disclosures on the materiality assessment process* of this Report.

E5-1. Policies related to resource use and circular economy

E5.MDR-P_01-06

Resource management is a key element for us. Consequently, our policies are interrelated to guide the adoption of a business model that focuses on the use of lower-impact raw materials as opposed to conventional ones[19], as well as recyclability, durability and repairability, and proper waste management, to reduce the impact on society and the environment.

Policies related to resource use and circular economy

/ Sustainability Policy ⓘ
/ Ecosystems and Biodiversity Policy ⓘ
/ Sustainability Stakeholder Relations Policy ⓘ

ⓘ More information on our policies and their updates in section *MDR-P. Policies* in this Report.

Towards lower-impact sourcing

E5-1_01;
E5-1_02

Our **Sustainability Policy** enshrines our unwavering commitment to **circularity**, from the design of the products marketed by the Group to considerations relating to their end of life, and improving resource and waste management throughout the value chain. To do this, we apply the waste hierarchy, we seek to ensure that waste is reconverted into a new resource and we move towards the creation of secondary raw materials as the essence of the circular economy to avoid the use of virgin raw materials.

Our **Ecosystems and Biodiversity Policy** further develops those principles, laying the groundwork to promote best practice in the sourcing and use of natural materials, prioritising the use of materials, inputs and products with a lower environmental impact.

This ambition is enshrined in our **Fibres Plan**, which envisages the use of lower-impact textile fibres, as compared to conventional ones, by 2030. To achieve this target, recycled and next-generation fibres play a key role.

[19] More information on the criteria that fibres and materials must fulfil to be classified as lower-impact in the *Methodological Annex* of this Report.

We are therefore committed to the responsible design of our garments and the careful selection of raw materials, which allows us to source materials and textile fibres through lower-impact production systems.

In addition, our Sustainability Policy also includes the obligation that animal products come from animals treated ethically and responsibly, in accordance with the internationally accepted 'Five Freedoms' of animal welfare.

ⓘ More information in section *E5-3. Targets related to resource use and circular economy* of this Report.

E5-2. Actions related to resource use and circular economy

E5.MDR-A_01-12

Our sustainability strategy covers our aim to progress towards a circular economy model that **transforms waste into resources and that promotes lengthening the life of our products**. Not only is circularity a transformative aspect in our Company and industry, but it represents an opportunity to improve our long-term resilience and efficiency. That is why we endeavour to integrate it at every level of our organisation, from design and production processes to managing our stores, logistics and offices.

To achieve this, we are committed to innovation in materials, production processes and the use and end of life of our products. We base this innovation on collaboration with universities, suppliers, startups, companies from different sectors and social organisations.

Indeed, implementing these innovative projects and providing the sector with fibres and processes that have a lower impact than traditional ones is one of the drivers of our circularity strategy.

Initiatives to progress towards a circular economy model

/ Sustainability Innovation Hub

Related IROs: [E5.I1; E5.I2; E5.R1; E5.O2]

MDR-A_01; MDR-A_02; MDR-A_03; MDR-A_04; MDR-A_05; E5-2_07

In 2024 we continued to work on our Sustainability Innovation Hub (SIH), a centre for innovation launched in 2020 with an action plan through 2030. This hub was designed to **support the adoption and scaling of innovative fibre, material, production process and traceability technologies in the textile and footwear sector**. The aim is to minimise the environmental impact associated with raw materials and production processes in the textile industry.

To achieve this, we join forces with startups, suppliers, academic institutions and technological centres in proposals that are assessed based on their impact on social aspects, circularity, biodiversity and animal welfare, as well as being subjected to a life-cycle environmental analysis. This assessment covers 16 impacts in areas such as emissions, water and land use.

This action is consistent with our Sustainability Policy, which fosters the use of lower-impact raw materials and processes, and with our Fibres Plan target making 25% of our fibre to be Next Gen by 2030. This is one of the milestone to ensure that 100% of our textile fibres are lower-impact[20] by that date.

In 2024 this platform encompass more than **300 emerging companies** working to incorporate new materials, improve production processes and make headway in connection with traceability, packaging and use and end of life. The Hub also conducted the environmental, technical and commercial analysis of more than 20 new startups and completed more than 40 life cycle analyses.

[20] More information on the criteria that fibres and materials must fulfil to be classified as lower-impact in the *Methodological Annex* of this Report.

Featured initiatives

/ Investments in capital:

- **INFINITED FIBER:** startup specialising in the recycling of cellulose materials and creator of Infinna™, a recycled fibre made from cotton-rich textile waste.
- **GALY:** startup that has developed an innovative and unique process to grow cotton in vitro using stem cell multiplication. We also have a Joint Development Agreement to optimise and perfect this technology, strengthening our commitment to innovation in the textile sector.
- **EPOCH:** startup that uses artificial intelligence to design enzymes that allow the recycling of plastic and textile materials. We have also signed a Joint Development Agreement.

This comes alongside the capital investment we already made in Circ, with a technology to enable the recycling of garments made of more than one material.

/ Catalyst for pilot projects and demonstrations:

In 2024, we carried out pilot projects for more than 30 innovations and we have launched a collection with CIRC x Zara, as the first milestone in our ongoing collaboration. Another striking milestone was the purchase of the first 2,000 tonnes of Circulose®, an innovative textile pulp produced from cotton waste recycled using a chemical process.

Lastly, we also have the research programme The Materials by Inditex, designed to put forward disruptive solutions for fibres and materials on an industrial scale, in partnership with the foremost industry leaders such as BASF, YKK, Velcro and Freudenberg, among others. Among the most noteworthy applications of this programme are Loopamid x Zara, an initiative aimed at proving the viability of the first circular jacket, and Haptex x Tempe, the first synthetic leather designed to be circular.

MDR-A_06; MDR-A_07

The financial resources earmarked for these actions are associated with Investment and Opex, which on their own do not imply a material amount. They are included in Financial Investments and Operating Expenses and (see *Note 18* and *Note 6* of the Consolidated Annual Accounts).

/ Cotton Strategy

Related IROs: [E5.I1; E5.R1; E5.O2]

MDR-A_01; MDR-A_02; MDR-A_03; MDR-A_04

One of the goals of our Fibre Plan is to ensure that, by 2030, 25% **of the fibres we use are fibres from organic or regenerative agriculture.**

To make headway in this goal, in 2024 we launched the Cotton Strategy to help establish a supply of cotton that ensures the well-being and resilience of farmers, communities and related ecosystems (financial, ecological and social), by fostering agricultural best practices in connection with regenerative organic cotton. These agricultural best practices affect air and soil health, biodiversity, water and people.

The **main outcomes** by 2030 we are pursuing with this strategy are:

/ Increase the visibility and transparency of cotton growing practices, through solid systems that ensure the integrity and traceability of the certifications.

/ Promote the reduction of environmental impacts, including GHG emissions and adverse effects on water resources and biodiversity, by improving agricultural soil health.

/ Promote the financial resilience of farmers and respect for decent work in the countryside and the community.

/ Improve the training provided to cotton suppliers, fostering more responsible cotton production.

/ Encourage the development of mechanically recycled cotton and its adoption in the supply chain.

MDR-A_05

ⓘ More information on progress in regenerative and organic cotton consumption in section *E5-4. Resource inflows* of this Report.

MDR-A_06;
MDR-A_07

This action was carried out primarily by our people. The financial resources linked to the implementation of these actions are associated with staff costs along with other external expenses deriving from the operations, which separately do not represent a material amount. Both are included in Operating Expenses in the Consolidated Income Statement (see *Note 6* of the Consolidated Annual Accounts).

Use, end of life and waste management

/ Zara Pre-Owned

MDR-A_01;
MDR-A_02;
MDR-A_03;
MDR-A_04;
MDR-A_05;
E5-2_05;
E5-2_08

Related IROs: [E5.I2; E5.I3; E5.R1; E5.O1]

At Inditex we want our products to accompany our customers for a long time. This is why we seek to help them extend the life of their garments and to make our products durable, thereby contributing to a circular economy in our value chain, in keeping with the commitment in our Sustainability Policy. With this goal in mind, we are working on actions that offer innovative options and alternatives to maximise the useful life of our products.

One such initiative is Zara Pre-Owned, a platform we launched in 2022 to provide repair services and facilitate customer-to-customer sales and donations. At present, in line with our aim of introducing circularity services in all the key markets by 2025, Zara Pre-Owned is available in Spain, Germany, Austria, Belgium, Croatia, Slovakia, Slovenia, the United States, Finland, France, Greece, Ireland, Italy, Luxembourg, the Netherlands, Portugal and the United Kingdom, offering the following services:

- **Repair** of any used Zara garment from any season. Our customers can request services such as button and zip replacements or seam repairs either online or in the Zara store of their choice. Our aim is to reach all stores in the markets where the service is available.
- **Customer-to-customer sales** so as anyone can buy and sell Zara garments from any season. The space is organised by product category and provides detailed information on each item, including Zara's original information on the garment and current images from the seller.
- **Donation:** customers can request the collection of clothes from their home to be donated to charitable entities. All collected items are delivered to local organisations that sort them for reuse where possible or to be recycled if they have reached the end of their life cycle, supporting the development of projects in local communities, as explained in the next section.

We have also adhered to the Refashion bonus scheme in France. This is an initiative under the French Anti-Waste for a Circular Economy law (*Loi AGEC*) launched through Refashion. Its mission is to encourage French consumers to repair their clothes and shoes, to promote the traceability of brands and to financially support organisations specialising in textile reuse and recycling.

The bonus allows our customers to reduce the repair costs of clothing, promoting sustainability and extending the lifespan of garments. It is financed by an Extended Producer Responsibility fund, which covers between 6 and 25 euros in certified workshops, and Zara is already certified.

MDR-A_06;
MDR-A_07

Zara Pre-Owned is a service hosted in Zara's own website, so the funds linked to its launch were not significant. The financial resources linked to implementing the associated actions are related to staff costs together with other external operational costs, which separately do not represent a material amount. Both are included in Operating Expenses in the Consolidated Income Statement (see *Note 6* of the Consolidated Annual Accounts).

MDR-A_01; MDR-A_02; MDR-A_03; MDR-A_04; E5-2_05; E5-2_08

/ Clothing collection programme

Related IROs: [E5.I2; E5.I3; E5.R1; E5.O2]

The clothing collection programme allows our customers to donate items they no longer use to **more than 91 local community organisations** in the markets where we operate.

This donation is made physically through containers located in our stores and, in certain markets such as Spain and the United Kingdom or cities such as New York and Paris, we have made Zara.com home collection services available to our customers. In Spain we also work with Caritas to enable the donation of garments by means of containers located in the streets of various Spanish cities.

These organisations receive the donated garments and footwear from our facilities. The purpose of this programme is to classify these articles in accordance with the waste hierarchy principle, in line with the commitment set out in our Sustainability Policy. The organisations that receive the donations sort the garments, and those that are in good condition are donated to vulnerable people or resold to fund their social projects. Products that cannot be reused are sent for recycling.

Therefore, the clothing collection programme **aims to mitigate the environmental impact of textile waste**, mainly by promoting reuse and recycling.

MDR-A_05

In 2024, our clothing collection programme recovered a total of 19,484 tonnes of garments and footwear (20,259 tonnes in 2023) that were donated to our partners in their entirety. To foster transparency in connection with these donations, our partners report to us regularly regarding how the articles received are used. In 2024, they informed us that:

/ 57% of all garments were reused via donations to people in vulnerable situations or by reselling to finance community projects.

/ The remaining 43%, which could not be reused due to their characteristics or condition, were sent to recycling projects (mainly downcycling), or, as a last resort, were sent to energy recovery.

MDR-A_06; MDR-A_07

The financial resources earmarked for these actions are associated with staff costs and other external operating expenses, which separately do not represent a material amount. Both are included in Operating Expenses in the Consolidated Income Statement (see *Note 6* of the Consolidated Annual Accounts).

/ Supply Chain Environmental Transformation Plan 2024-2027

Related IROs: [E1.I1; E1.I2; E1.R1; E2.I1; E2.I2; E2.R1; E3.I1; E3.I2; E3.R1; E5.I1; E5.I2; E5.I3; E5.R1; E5.O1; E5.O2]

Our Supply Chain Environmental Transformation Plan 2024-2027 also envisages actions linked to the use of resources and circular economy in our supply chain.

Due to its transversal nature, the detailed description of the Plan, as well as the Plan's energy consumption and emission reduction requirements are provided in chapter E1. Climate Change, information on wastewater treatment and chemicals is provided in chapter E2. Pollution and information on water consumption is provided in chapter E3. Water resources. This chapter includes information concerning waste management.

ⓘ More information on other related actions in sections *E1-3. Actions related to climate change*, *E2-2. Actions related to pollution* and *E3-2. Actions related to water resources* of this Report.

- **Waste management**

MDR-A_01; MDR-A_02; MDR-A_03; MDR-A_04

At Inditex we want to promote optimal waste management, reducing waste generation, and encouraging reuse and recycling, minimising the amount of waste sent to landfill, and fostering the circularity of textile waste.

Factories in our supply chain generate different types of waste, both hazardous and non-hazardous, which must be properly handled, labelled and stored. The proper handling, control and management of hazardous waste is especially important, to avoid leaks that spread hazardous substances to the environment.

Our **Green to Wear (GtW)** standard includes requirements on proper waste management. This means that the waste must be sorted, properly labelled and stored with adequate ventilation and leakage prevention, especially in the case of hazardous waste.

In order to achieve the goal of proper hazardous waste management, the facility must have a contract in force with an authorised waste manager, a properly covered and updated hazardous waste inventory, a record of deliveries to the authorised waste manager, and a separate storage area where waste can be properly managed.

ⓘ More information on other related actions in sections *E1-3. Actions related to climate change*, *E2-2. Actions related to pollution* and *E3-2. Actions related to water resources* of this Report.

Agreements and collaborations

E5-2_07

At Inditex we want to make headway in the use of recycled materials, which are not dependent on the extraction of virgin raw materials and help reduce waste generation. For this reason, we establish collaborations with organisations like Textile Exchange, OCA, Global Fashion Agenda and Fashion for Good in initiatives like the availability of lower-impact raw materials, design geared to recyclability, the assessment of infrastructure necessary to process waste or the development of new forms of textile recycling.

We are part of ReHubs Europe, a non-profit association of relevant companies and organisation in the European textile and footwear value chain. ReHubs works to expand the current capacities for collection, sorting, preparation for recycling and final recycling of textile waste in Europe to an industrial scale. We are also cofounders of the Association for the Management of Textile and Footwear Waste (AGRTC) and, in 2024, we worked, in line with the activities initiated in 2023, to form the voluntary Collective System of Extended Producer Responsibility (EPR) for the textile and footwear waste stream, Re-Viste, which was launched in October 2024. The AGRTC is awaiting a licence for Re-Viste to start operating as a EPR on a voluntary basis during 2025.

ⓘ More information in the document *Partnerships* on Inditex's corporate website.

C. Metrics and targets

E5-3. Targets related to resource use and circular economy

E5.MDR-T_01-13

So as to move towards a more circular business model that encompasses every phase of our activity, we have set ourselves various targets, ranging from the sourcing of raw materials (promoting the use of lower-impact raw materials, in line with our Fibre Plan) right through the use and end of life of our products, by providing circularity services.

These targets are closely related to our Sustainability Policy, in which we are committed to circularity, a core aspect in our progress towards the decarbonisation of our value chain.

- **Fibres Plan: use of lower-environmental-impact fibres**

MDR-T_01

One of the main commitments in terms of resource use is our Fibres Plan, which is aimed at 100% of the textile fibres used in our products by 2030 having a lower environmental impact as compared with conventional fibres.

This target is related to the commitment to prioritising sourcing raw materials, supplies and products that avoid and reduce negative impacts on ecosystems throughout their life cycle, as set out in our Sustainability Policy and Ecosystems and Biodiversity Policy.

MDR-T_02;
MDR-T_07;
MDR-T_08;
MDR-T_13

Target: use 100% lower-impact fibres (preferred fibres) by 2030

	Current year	Target year
	2024	2030
Total percentage of lower-impact fibres	73%	100%
How this is broken down by type of fibre		
/ Use 25% of next-generation fibres that do not yet exist on an industrial scale and that we are helping to develop	0%	25%
/ Use 40% of textile fibres from conventional recycling	39%	40%
/ Use 25% of textile fibres from organic or regenerative agriculture	23%	25%
/ Use 10% of textile fibres from other preferred options in line with the indicators specified by benchmark organisations	10%	10%
What are the short-term targets		
	2024	2025
/ 100% lower-impact polyester by 2025	89%	100%
/ 100% lower-impact linen by 2025	74%	100%

E5-3_01;
E5-3_02;
E5-3_03;
E5-3_04

We aim to encourage the design of products that last over time and can be recycled at the end of their useful life. With this in mind, we train our designers and sales teams in sustainability criteria and foster those materials with a lower-impact on biodiversity, land use, water consumption and greenhouse gas emissions.

Accordingly, our **Fibres Plan** is a cornerstone for improving our impact and advancing our sustainability strategy. Further details of the main lower-impact fibres used in the latest autumn/winter 2024 campaign are provided below, including the third-party standard to which they belong:

Type of fibre		% over total of the type of fibre
Cotton	Organic cotton (OCS/GOTS)	44%
	Cotton in conversion/transition (OCS/GOTS)	8%
	Recycled cotton (RCS/GRS)	17%
Man-made cellulosic fibres	Recycled (RCS/GRS)	0%
	Other third-party standards (Canopy and Changing Markets[(1)]; or FSC)	91%
	MMCF – innovative fibres	2%
	Other third-party standards (Canopy)	1%
Linen	European linen (European Flax certificate)	74%
	Organic linen (OCS/GOTS)	0%
	Recycled linen (RCS/GRS)	0%
Polyester	Recycled polyester (RCS/GRS/Repreve/Eucertplast/Recyclass/ISCC Plus)	89%
	Polyester – innovative fibres	0%

[(1)] Man-made cellulosic fibres that meet the requirements of the Changing Markets Foundation's Roadmap towards responsible viscose & modal fibre manufacturing.

MDR-T_03;
MDR-T_04;
MDR-T_05;
MDR-T_06;
MDR-T_09;
MDR-T_12;
E5-3_13

ⓘ More information on the criteria and the lower-impact fibres considered, along with the scope, methodology and calculation changes in the *Methodological Annex* of this Report.

MDR-T_01;
MDR-T_02;
MDR-T_03;
MDR-T_07;
MDR-T_08;
MDR-T_13

- **Provide circularity services such as Zara Pre-Owned in key markets**

At Inditex, we want to help our customers extend the useful life of their garments, so our target is to provide circularity services such as Zara Pre-Owned in key markets in 2025. With the addition of the United States in 2024, the programme is now under development in 17 markets.

This target is linked to the commitment enshrined in our Sustainability Policy to resource efficiency, in both the products we sell and our headquarters, stores and logistics centres.

MDR-T_04;
MDR-T_05;
MDR-T_06;
MDR-T_09;
MDR-T_12;
MDR-T_13;
E5-3_13

ⓘ More information on the scope and calculation methodology in the *Methodological Annex* of this Report.

E5-3_01;
E5-3_02;
E5-3_03;
E5-3_04;
E5-3_05;;
E5-3_06;
E5-3_07;
E5-3_08;
E5-3_09

By providing circularity services, we foster the reuse of products, extending their useful life through repair, resale between third parties or donation to community organisations. These organisations sort the garments by their condition and quality, allocating them to the best possible purpose, such as donation to people at risk of exclusion or sale in second-hand shops. These organisations also support the implementation of social projects in their markets.

In cases where a product is not reusable, it is recycled, aiming to limit the amount of waste generated and repurposing the raw materials obtained to make new garments. Considering the tiers of the waste hierarchy —Prevent, Reduce, Reuse, Recycle, Recover, Dispose— this target corresponds primarily to 'Reuse' and 'Recycle'.

At present, manufacturing new garments from recycled used clothing is one of the challenges facing the sector. That is why we endeavour to foster textile innovation and the development of used clothing recovery and management systems.

E5-4. Resource inflows

E5-4_01;
E5-4_02;
E5-4_03;
E5-4_04;
E5-4_05

The design of our products and selection of raw materials are factors that shape the impact of our products. Accordingly, a fundamental aspect of our sustainability strategy is the commitment to use lower-impact fibres, enshrined in our Fibres Plan.

ⓘ More information in section *E5-3. Targets related to resource use and circular economy* of this Report.

In 2024, we consumed 678,596 tonnes of raw materials used in our products (645,623 tonnes in 2023), which, by type, were broken down between 88% fibres and 12% non-fibres. With regard to the category of fibres, 53% were natural fibres[21], 37% synthetic[22] and 10% artificial[23].

	2024			2023
	% of total tonnes of raw material	**Raw material**	**% of total tonnes of raw material**	**% of total tonnes of raw material**
Biological raw materials	57%	Cotton	44%	43%
		Man-made cellulosic fibres	8%	8%
		Linen	2%	2%
		Others(1)	3%	– (3)
Technical raw materials	43%	Polyester	26%	26%
		Others(2)	17%	– (3)

(1) This category includes other raw materials like wool, leather, wood and paper, among others.
(2) This category includes other raw materials like polyamides, glass or certain metals, among others.
(3) The breakdown of raw materials into biological and technical materials has been adapted for the current reporting exercise, in accordance with the ESRS. In 2023, the 'other raw materials' category was reported on a consolidated basis and accounted for 21% of total raw materials.

[21] Natural fibres are filaments obtained from natural sources that can be threaded to obtain strands, threads or twine.
[22] Synthetic fibres are made of polymers that are not naturally produced, but fully created in a chemical plant or a laboratory, almost always using petroleum or natural gas by-products.
[23] Man-made fibres are made using a natural component as a raw material that undergoes a number of processes in a chemical plant or a laboratory.

With regard to the use of recycled materials, in 2024, 33% of all fibres and other raw materials used in our products are recycled, coming from both conventional and next-gen recycling of post-consumer waste (18% recycled materials in 2023). These materials are designed to ensure the technical and durability functions required in certain products, thereby contributing to sustainability and reducing the environmental impact in our supply chain.

In addition to the raw materials used directly to make our articles, we also use different materials in the packaging of our products. In 2024 we estimated that 521,448 tonnes materials were used for this purpose (84% organic packaging and 16% technical packaging). Furthermore, we continue to improve our corporate systems to report the recycled content of our packaging with the required detail.

Moreover, manufacturing processes also require other resources, such as chemicals and water, at certain facilities along the supply chain. At Inditex we have a series of policies and standards that determine our action principles on this topic, and that provide guidelines to prevent the emission of harmful substances in the various stages of the value chain and to promote a more efficient use of water.

ⓘ More information on water resources used in sections *E2-1. Policies related to pollution* and *E3-3/E3-4. Water consumption and related target* of this Report.

E5-4_06

The Methodological Annex of this Report contains a detailed description of the methodology employed to calculate the raw materials used in the manufacture and packaging of our products.

ⓘ More information in the *Methodological Annex* of this Report.

E5-5. Resource outflows

E5-5_01;
E5-5_04;
E5-5_06

At Inditex, our aim is to offer our customers an affordable, inspiring, high-quality and responsibly produced fashion proposal.

We also intend to advance towards a **circular economy model** that permeates every level of our business, from the design and production processes to managing our stores, logistics and offices.

As discussed throughout this chapter, we have numerous initiatives in place to promote the use of lower-impact raw materials and to encourage mechanical and next-generation recycling. In section E5-4. Resource inflows, we report the information concerning the raw materials used in our products, as well as the content of recycled materials used in 2024.

ⓘ *More information in sections E5-2. Actions related to resource use and circular economy, E5-4. Resource inflows and in the Methodological Annex of this Report.*

With regard to the percentage of our products that are recyclable, at present there is no standard methodology in the industry to calculate this information on a comparable way. Consequently, we are working with other important players to be able to report this information in the future.

E5-5_02;
E5-5_03

We are also working to address the lack of standardisation of potential methodological frameworks for measuring and defining the durability and repairability of products. We are currently involved, as members of the Technical Secretariat, with other major industry players, in developing the European Commission's ***Product Environmental Footprint*** **(PEF)** , a new, Europe-wide framework to gauge the environmental impact and provide comparable and harmonised information.

E5-5_05

In turn, our commitment to reducing our products impact also includes those items that accompany our items, such as packaging. Accordingly, at Inditex we have chosen to eliminate single-use plastics that reach customers in the packaging containing our products. Our commitment in this sphere implies a continuous effort in innovation to avoid using single-use plastics in new product lines, at our suppliers and in other Group operations.

We also have the **#BRINGYOUROWNBAG** (#TRAETUBOLSA) initiative, aimed at raising our customers' awareness regarding the importance of choosing reusable alternatives, reducing waste and minimising the consumption of raw materials, water and energy. This initiative, currently present in 79 markets, has reduced the number of bags and envelopes handed out in our stores by 48%. The proceeds from charging for bags and envelopes made from recycled paper in our stores and earmarked for environmental projects since 2021 amount to 120.5 million euros. At the end of the financial year, we allocated 67 million euros from those proceeds[24] to projects in 31 countries.

ⓘ More information on the projects to which the proceeds of #BRINGYOUROWNBAG have been donated in section *E4-3. Actions related to biodiversity and ecosystems* of this Report.

In addition, we promote the collection of packaging materials after use for reuse or recycling. With the aim of going one step further, we are rolling out a service allowing our Zara online customers to choose whether they wish to receive their orders in reused boxes. The service is active in various geographic areas in Spain and we are working to expand its scope into new markets forthwith. In this regard, we are working on improving our systems to report greater detail on these aspects, such as the proportion of recyclable items, in future years.

Waste management

E5-5_07;
E5-5_08;
E5-5_09;
E5-5_10;
E5-5_11;
E5-5_12;
E5-5_13;
E5-5_14;
E5-5_15;
E5-5_17

We work on the properly management and separation of the waste generated by our activity. We see this waste as useful resources that can be repurposed or recycled, maximising its value and improving our impact.

This approach is not confined to properly sorting materials for processing and recycling, but includes rethinking our processes to reduce waste generation at every stage: design, logistics, store and end of life.

In this regard, we have 15 TRUE certifications, processed by Green Business Certification Inc. for our headquarters, logistics centres and own factories —nine Platinum and six Gold certifications—. TRUE certification identifies 'environmentally responsible spaces that have achieved 90% or greater overall diversion from landfill or incineration'.

Waste generation at our headquarters, logistics centres and own factories is presented below[25]:

	2024	
Type of waste	**Tonnes**	**%**
Cardboard and paper	38,413	64%
Wood	6,334	11%
Other non-hazardous waste	5,800	10%
Plastic	8,352	14%
Textile waste	1,054	2%
Metal	261	0%
Hazardous waste	55	0%
Total	**60,269**	**100%**

[24] Due to the time lag between charging for the bags and the formulation of initiatives, the amount currently raised exceeds the contribution allocated to projects.

[25] Waste generated in the Group's own stores is not included, as this information is not yet available at the required level of detail in the Company's systems. An estimate of this waste generation is provided below the table. This year we have expanded the scope of waste reported to include waste generated at operationally controlled e-commerce centres. Waste generated in previous years is not reported as it is not comparable, given the impossibility of recalculating the historical data according to this new scope.

The destination of this waste was as follows, according to its treatment:

	2024				
	HAZARDOUS		NON-HAZARDOUS		
	Tonnes	%	Tonnes	%	Total
Diverted from disposal	**51**	**92%**	**54,910**	**91%**	**54,961**
Recycling	18	32%	54,651	91%	54,669
Other waste recovery operations	26	47%	0	0%	26
Preparation for reuse	7	13%	259	0%	266
Directed to disposal	**4**	**8%**	**5,303**	**9%**	**5,308**
Landfilling	3	6%	4,987	8%	4,990
Other disposal operations	0	1%	0	0%	0
Incineration (with energy recovery)	1	2%	316	1%	317
Incineration (without energy recovery)	0	0%	0	0%	0
Total	**55**	**100%**	**60,214**	**100%**	**60,269**

Thus, in 2024, 9% of the waste generated at our headquarters, logistics centres and own factories will have been diverted for operations other than recycling, representing 5,600 tonnes.

We continue to make every effort to ensure the traceability of waste in the most challenging cases, such as in our stores located in shopping centres that combine the management of all waste.

In this connection, we continue to work to integrate in our systems the available information on the volume of waste generated at our stores. Based on the data available at the reporting date, we have estimated that in 2024 around 116,965 tonnes of waste was generated through the Group's own stores.

E5-5_17

The Methodological Annex of this Report contains a detailed description of the methodology employed to calculate the waste generated at our facilities as a result of our activities.

ⓘ More information in the *Methodological Annex* of this Report.

Disclosure pursuant to article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)

Regulatory context

The Inditex Group is subject to Regulation (EU) 2020/852 on EU Taxonomy (hereinafter 'Taxonomy'), which stipulates a series of obligations with regard to the disclosure of information relating to 'environmentally sustainable' activities. Since 2021, we have been reporting information concerning the Taxonomy in accordance with the applicable regulations, the scope of which has increased since that date with the publication of Delegated Regulation (EU) 2021/2139 (the Climate Delegated Act), Delegated Regulation (EU) 2021/2178 (the Disclosures Delegated Act) and Delegated Regulation (EU) 2023/2486 (the Environmental Delegated Act).

Companies remain exposed to the need to adapt to new requirements and periodically review their internal activities and management systems, due to the continuous development of new legislation and guidelines in the context of the Taxonomy, in order to ensure that the information provided is comprehensive and adequately compliant with the regulation.

In this context, it is confirmed that for now the Group's main activity — the distribution and sale of fashion and household products—is not currently included in the applicable regulatory framework. Nevertheless, there are other activities linked to the Group's business model that are included, as outlined below.

Scope and assessment of Inditex's activities

The scope of the information on Taxonomy includes all the companies over which the Inditex Group has control or joint control (listed in *Annex I* of the Consolidated Annual Accounts). Within this scope, the Group has conducted an analysis of its accounting information in order to determine which activities are associated with those described in the Taxonomy in relation to each of the six targets.

Methodology and results

To assess the contribution to each of the objectives established by the Taxonomy, we applied the following methodology:

1) **Eligibility analysis by type of activity:** analysing the accounting items linked to the three key indicators and how they match the descriptions of the Taxonomy activities included in Annexes I and II of the Climate Delegated Act and I to IV of the Environmental Delegated Act.

2) **Analysis of alignment by activity type:** we assessed, for all the activities considered eligible, compliance with the established criteria:

   - Technical screening criteria for substantial contribution.
   - The criteria of 'Do No Significant Harm' (DNSH) to the rest of environmental objectives.
   - Compliance with minimum social guarantees.

3) **Calculating the indicators and results:** considering the eligible activities aligned with the Taxonomy in accordance with the conclusions drawn from points 1 and 2.

1. Eligibility analysis of the activities carried out by Inditex

As a result of the assessment of its accounting information, eligible activities were identified within the framework of the climate change mitigation (CCM), climate change adaptation (CCA) and circular economy (CE) objectives.

These activities may be encompassed in four main groups according to the activity type considered by Inditex**: store refurbishments and openings, construction and renovation of corporate headquarters, the Group's logistics centres and other own facilities, and generation of electricity from wind and photovoltaic energy.**

The main conclusions of this analysis in connection with the three key indicators (Turnover, CapEx and OpEx) are presented below.

Turnover: Inditex is mainly dedicated to the distribution and sale of fashion items, and this activity is its main source of revenue. Since this activity is not currently included in the Taxonomy, no turnover items have been identified that could be considered eligible.

OpEx: in keeping with the definition of this indicator provided in Taxonomy, the percentage of eligible OpEx of the Inditex Group for 2024 has been considered to be approximately 0%.

CapEx: a core portion of the Group's CapEx corresponds to investments undertaken in relation with store **refurbishments and openings.** However, in most cases these actions are linked to the design and refurbishment of retail spaces, mainly leased premises, which only exceptionally involve the building's envelope or insulation (which is what has the capacity to influence its energy efficiency). This means that only in these exceptional cases are the Group's activities considered to be eligible in accordance with the description of the 'renovation of existing buildings' activity corresponding to the activity codes 7.2. CCM/CCA, for the climate change mitigation and adaptation objective, and 3.2. CE, for the circular economy objective. In this regard, it is worth noting that both activities describe the activity of renovation of existing buildings identically.

Another significant part of CapEx refers to the **construction and refurbishment of the Group's corporate headquarters, logistics centres and other own facilities**. In this case, with regard to the eligibility of the 'acquisition and ownership of buildings' activity corresponding to activity code 7.7. CCM/CCA, for the climate change mitigation and adaptation objectives. Activities with the capacity to influence the energy efficiency of the buildings analysed have been considered to be eligible.

The Company also carries out investments to foster self-consumption through the **generation of electricity using photovoltaic and wind power** at its own facilities. These investments are considered to be eligible in the framework of activity 'electricity generation from wind power' 4.3. CCM/CCA, in connection with both climate change mitigation and adaptation and the 'installation, maintenance and repair of renewable energy technologies', 7.6. CCM/CCA, in connection with mitigation and adaptation.

Furthermore, the Inditex Group undertakes **other eligible investments**. They are related, among others, with the installation, maintenance and repair of energy efficiency equipment in stores, headquarters and logistics centres, software development and data processing, and the implementation and operation of systems that supervise and optimise energy consumption to boost efficiency, which could be considered to be eligible in the framework of activities 7.3. CCM/CCA (installation, maintenance and repair of energy efficiency equipment), 7.5. CCM/CCA (installation, maintenance and repair of instruments and devices used to measure, regulate and control energy efficiency in buildings) and 8.1. CCM/CCA (data processing, hosting and related activities), respectively. However, these activities, which represent a inmaterial proportion of approximately 0% of the Group's CapEx in 2024, would not meet the technical screening criteria and are not therefore Taxonomy-aligned.

Other taxonomic activities in which the Group is investing were also identified. These notably include: Activity 5.3. CE (preparation for re-use of end-of-life products and product components), activity 5.4. CE (sale of second-hand goods) for the circular economy objective. However, these activities, which also represent a inmaterial proportion of approximately 0% of the Group's CapEx in 2024, would not meet the technical screening criteria and are therefore not Taxonomy-aligned.

According to the analysis carried out, the Group considers the following activities to be eligible in 2024 (solely in terms of CapEx):

Type of activity	Taxonomy objectives	Description of the activity	Inditex Group activities
Renovation of existing buildings	Climate change mitigation (7.2. CCM) Climate change adaptation (7.2. CCA) Circular economy (3.2. CE)	Construction and civil engineering works or preparations for such works	Renovation of stores, headquarters and logistics centres when it is possible to upgrade the building envelope
Acquisition and ownership of buildings	Climate change mitigation (7.7. CCM) Climate change adaptation (7.7. CCA)	Buying real estate and exercising ownership of that real estate	Ownership of headquarters, logistics centres and adjacent buildings by the Group and other facilities owned by it, provided there is a possibility of influencing the energy efficiency of the buildings analysed
Electricity generation from wind power	Climate change mitigation (4.3. CCM) Climate change adaptation (4.3. CCA)	Construction or operation of wind-generated electricity facilities	Electricity generation activities in wind power plants
Installation, maintenance and repair of renewable energy technologies	Climate change mitigation (7.6. CCM) Climate change adaptation (7.6. CCA)	Installation, maintenance and repair of renewable energy technologies, on-site	Installation, maintenance and repair of renewable energy technologies at logistics centres provided they are carried out on-site as building technical installations

2. Analysis of the alignment of activities by type of activity

For each of the eligible activities previously described, an assessment was carried out of the technical criteria in the climate change mitigation and adaptation objectives, specifically for CapEx. As a result, it was observed that the Group's activities contribute solely to the mitigation objective. This is because the actions identified in relation to the taxonomic activities mentioned are not carried out with the purpose of being 'adaptation solutions' or 'transition towards a circular economy' in keeping with the requirements for these activities pursuant to the criterion of substantial contribution to these objectives.

Accordingly, below is a detailed breakdown of the analysis of compliance with the technical screening criteria for the specific activities relating to the **climate change mitigation objective (CCM):**

- **Renovation of existing buildings** (activity 7.2. CCM), which is reported as CapEx in accordance with point 1.1.2.2.a) of the Disclosures Delegated Act, explains the assessment of compliance with the technical criteria relating to substantial contribution and DNSH specific to this activity;
- **Acquisition and ownership of buildings** (activity 7.7. CCM), which is reported as CapEx and investment plan in accordance with points 1.1.2.2.a) and 1.1.2.2. b) of the Disclosures Delegated Act, respectively, as well as explaining the assessment of compliance with the technical criteria and DNSH applicable in the first case, and, for the second case, explaining the criteria considered in the investment plan;
- **Electricity generation from wind power** (activity 4.3. CCM), reported via the CapEx Plan, in line with the applicable criteria.
- **Installation, maintenance and repair of renewable energy technologies** (activity 7.6. CCM), which is reported in point 1.1.2.2.a) of the Disclosures Delegated Act, explains the assessment of compliance with the technical criteria relating to substantial contribution and DNSH specific to this activity;
- Analysis of compliance with **DNSH criteria for the climate change adaptation objective and for the minimum social safeguards**, assessed jointly for the various groups of activities.

/ Renovation of existing buildings (Activity 7.2. CCM)

In 2024, several actions related to the comprehensive refurbishment of three of the Group's stores were identified as being aligned with the Taxonomy under activity 7.2. CCM, as explained below:

i. Compliance with the technical screening criteria for substantial contribution
With respect to the substantial contribution to the climate change mitigation objective, through the review of the works technical projects, it was observed that the action identified in this context implies the intervention on the building's facade and, accordingly, on at least 25% of its envelope, in keeping with the Taxonomy's requirements.

ii. Compliance with the technical screening criteria of 'Do No Significant Harm' (DNSH) specific to the activity

- **Climate change adaptation:** no material physical climate-related risks were identified that might affect the performance of the reported activity pursuant to the provisions of Annex A of the Climate Delegated Act. The detailed breakdown of compliance with this technical criterion is provided in the transversal section 'Compliance with the technical screening criterion of Do No Significant Harm (DNSH) to the climate change adaptation objective'.

- **Sustainable use and protection of water and marine resources:** the buildings analysed have been refurbished entirely, including sanitary fittings such as taps, basins and toilets that meet the minimum requirements as regards maximum water flow and maximum flush volume established by the Taxonomy. It is compliant with the technical guidelines followed by the Inditex Group in connection with plumbing and sanitation in the works it undertakes, which include caps on water flows in the plumbing systems of sanitary facilities in line with the Taxonomy's requirements, promoting a more conscious use of water resources.

- **Transition towards a circular economy:** the actions identified are compliant with the requirements of the Taxonomy, including that at least 70% of non-hazardous construction and demolition waste generated in the work should be recovered. This compliance is reflected in the store's Construction and Demolition Waste Management Plan, which includes building practices that support circularity; in addition to the construction waste management certificates, which confirm that 100% of the waste generated is recovered.

- **Prevention and control of pollution:** the construction components and materials used are compliant with the Taxonomy's requirements as per the record of the relevant affidavits and emission test. This includes the requirements linked to substances in Appendix C of the Climate Delegated Act, formaldehyde and volatile organic components (VOCs). In addition, the building complies with the Group's technical guidelines on indoor air quality and noise, which meet the Taxonomy requirements.

/ Acquisition and ownership of buildings (Activity 7.7. CCM)

(a) Investments in corporate headquarters
With regard to investments in headquarters, we continued to invest in the construction of a new corporate building, which will be a part of the complex of buildings that make up the Group's Arteixo headquarters. This action is presented by means of an investment plan, approved by Inditex Management, which details all the measures in place to ensure that these investments match the Taxonomy requirements within the framework of the climate change mitigation objective through activity 7.7.

Compliance with the technical screening criteria by means of the investment plan
With regard to the new corporate building, in accordance with the provisions of the Disclosures Delegated Act, it is possible to present aligned activities by means of the investment plan that evidences that the investment is earmarked for an activity that will be Taxonomy-aligned within a maximum period of five years. Such a plan must meet a series of requirements as per the provisions of the Disclosures Delegated Act and the guidelines in the FAQ documents published in 2022 by the European Commission[26].

The plan concerning the corporate building includes a detailed set of measures —with their related expense, status of progress of implementation dates— that must be carried out to ensure that the action complies with the technical screening criteria of activity 7.7. CCM. More specifically, the document details the measures to be adopted for compliance with the requirements concerning energy efficiency[27], Life Cycle Analysis[28] and the Study of Air Tightness and Thermal Integrity of the Envelope[29] applicable to large non-residential buildings built from 2020 onwards. Meanwhile, the detailed breakdown of compliance with DNSH is provided in the section 'Compliance with the technical screening criterion of Do No Significant Harm (DNSH) to the climate change adaptation objective'.

[26] Commission Notice on the interpretation and implementation of certain legal provisions of the EU Taxonomy Regulation and links to the Sustainable Finance Disclosure Regulation of 19/12/2022, more specifically in the answer to question 26.
[27] Obtaining an Energy Efficiency Certificate showing that primary non-renewable energy consumption is at least 10% below the energy consumption thresholds established for Nearly Zero-Energy Buildings (NZEB); design and calculation of the climate control installation based on the requirements of the Regulation of Thermal Installations in Buildings (RITE); installation of a Building Management System (BMS) to allow the building to be efficiently managed through energy efficiency control and assessment.
[28] Calculation of the average yearly Global Warming Potential (GWP) for a reference study period of 50 years, resulting from the construction in each stage of the building's life cycle and in accordance with EN 15978 Standard.
[29] Performance of an air tightness and thermal integrity study of the building in accordance with EN 13187 and EN 13829 or equivalent standards.

Construction of this project is scheduled for completion in 2025. Once the execution has been completed, the Group undertakes to periodically assess compliance with the relevant technical criteria in this context and to conduct the related adjustments to its calculations and disclosures where necessary.

(b) Investments in logistics centres, Group-owned adjacent buildings and other Group-owned facilities

This year investments were undertaken at logistics centres, adjacent buildings and other Group-owned facilities (corresponding to a new Group-owned factory), that are considered to be aligned with the Taxonomy under activity 7.7. CCM, as explained below:

i. Compliance with the technical screening criteria for substantial contribution

The aforementioned buildings, built after 2020, present non-renewable primary energy consumption of at least 10% below the energy consumption thresholds established for non-residential buildings in accordance with the Basic Document HE, Energy Savings ('DB HE Ahorro de energía').

The centres cover a surface area of more than 5,000m^2 and during their construction were subject to robust and traceable quality control processes. They are efficiently operated through the continuous oversight and assessment of their energy performance as provided in the Taxonomy for this purpose. Moreover, the Life Cycle Analysis report of these buildings states that the Global Warming Potential (GWP) resulting from their construction was calculated at each stage of their life cycle in accordance with the relevant standards. Inditex formally undertakes to disclose this GWP to investors and/or customers who so request.

ii. Compliance with the technical screening criteria of 'Do No Significant Harm' (DNSH) specific to the activity

- **Climate change adaptation:** no material physical climate-related risks were identified that might affect the performance of the reported activity pursuant to the provisions of Annex A of the Climate Delegated Act. The detailed breakdown of compliance with this technical criterion is provided in the transversal section 'Compliance with the technical screening criterion of Do No Significant Harm (DNSH) to the climate change adaptation objective'.

/ Electricity generation from wind power (Activity 4.3. CCM)

With regard to activity 4.3. CCM, one wind-generated electricity project was identified: the Punta Langosteira Outer Port Wind Facility. This project is aimed at achieving self-consumption between the Inditex Arteixo headquarters and the A Coruña Port Authority, and it will enter into operation in early 2027, so it is reported by means of an investment plan.

Compliance with the technical screening criteria by means of the investment plan

As previously explained in connection with the requirements pertaining to the investment plan for the Punta Langosteira Outer Port Wind Facility, measures are envisaged to ensure that the infrastructure is compliant with the technical screening criteria applicable to activity 4.3. CCM. Specifically, the purpose of electricity generation from wind power is included in the Technical Construction Report, which shows that the purpose of this facility is to generate wind power for self-consumption. Furthermore, an Environmental Impact Study is planned as is the compilation of a document outlining the availability of highly durable, recyclable and easily dismantable equipment and parts for the installation, so as to comply with the applicable biodiversity and circular economy DNSHs, respectively. In turn, the detailed breakdown of compliance with DNSH is provided in the section 'Compliance with the technical screening criterion of Do No Significant Harm (DNSH) to the climate change adaptation objective'

Construction of this project is scheduled for completion in 2027. Once the execution has been completed, the Group undertakes to periodically assess compliance with the relevant technical criteria in this context and to conduct the related adjustments to its calculations and disclosures where necessary.

/ Installation, maintenance and repair of renewable energy technologies (Activity 7.6. CCM)

With regard to activity 7.6. CCM, three photovoltaic projects have been identified at our Laracha logistics centres (expansion of existing facility) and Zaragoza. These projects are intended for self-consumption and are expected to come on stream in 2025.

i. Compliance with the technical screening criteria for substantial contribution

With regard to the substantial contribution to the objective of climate change mitigation, by means of review of the facility's technical projects, it was found that the activity consists of the installation, maintenance and repair of solar photovoltaic systems and auxiliary technical equipment on site as technical installations pertaining to these logistics centres.

ii. Compliance with the technical screening criteria of 'Do No Significant Harm' (DNSH) specific to the activity

- **Climate change adaptation:** no material physical climate-related risks were identified that might affect the performance of the reported activity pursuant to the provisions of Annex A of the Climate Delegated Act. The detailed breakdown of compliance with this technical criterion is provided in the transversal section 'Compliance with the technical screening criterion of Do No Significant Harm (DNSH) to the climate change adaptation objective'.

/ Analysis of compliance with the climate change adaptation DNSH and minimum social safeguards

Compliance with the technical screening criteria of 'Do No Significant Harm' (DNSH) to the climate change adaptation objective

The Inditex Group has analysed the potential impacts in connection with climate change risks, both physical and transition risks, using five emissions pathways aligned with the socioeconomic forecasts of the Intergovernmental Panel on Climate Change (IPCC's Shared Socioeconomic Pathways - SSPs), and considering short (0-5 years), medium (5-10 years) and long (more than 10 years) time frames. For physical risks, the Group has considered seven sources of risk that are relevant to Inditex's business. After identifying and assessing the potential impacts deriving from the sources of climate-related risks (including the most significant ones associated with a disruption of operations at key facilities, damages to physical assets or disruptions to the supply of raw materials), no material risks were detected that affect the reported Taxonomy activities. Furthermore, the Group has defined adaptation measures aimed at reducing its exposure to risks, thereby adapting to the consequences of climate change.

ⓘ More information on the assessment of climate-related risks in section *SBM-3. Material impacts, risks and opportunities* of this Report.

Compliance with the criteria for minimum social safeguards

For any economic activity to be considered to be aligned, it must be carried out in accordance with the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights.

The Group applies to its operations and business decisions an approach based on the development of due diligence processes, which enables the Group to identify, prevent, mitigate and remedy, if applicable, the impacts on the economy, the environment and people (including those related to human rights). In this regard, the Group's Human Rights Strategy is consistent with the UN Guiding Principles on Business and Human Rights and based on three pillars for integrating the promotion of and respect for human rights throughout the value chain: the Group's Human Rights Policy, due diligence and grievance mechanisms. There are also policies and procedures in connection with competition, anti-corruption, responsible business, conflicts of interest and fiscal responsibility. It is worth highlighting the Code of Conduct, aimed at ensuring a professional, ethical and responsible commitment from the Group and everyone belonging to it in the course of their activities, as a basic element of the business culture.

ⓘ More information in sections *G1. Business conduct* and *GOV-4. Statement on due diligence* of this Report.

3. Calculation of indicators and results

Having assessed the eligibility and alignment of the activities identified, the corresponding indicators (Turnover, CapEx, and OpEx) were calculated for each of them. The process of calculating these key performance indicators involves analysing the Group's consolidated information, excluding intercompany transactions, bearing in mind the adjustments made in the consolidation process, using a single source of information to avoid considering the same item twice, and checking the traceability and accuracy of the information.

These indicators represent the proportion of the Group's turnover, investments in assets and operating expenditure, that adheres to, whether in the form of eligibility or alignment, the requirements outlined in the Taxonomy. To construct the numerators of the three key performance indicators, the corresponding items identified as eligible or aligned as per the Taxonomy are considered. With regard to the denominators:

- **Turnover:** the denominator includes the ordinary revenue in the year. Revenue from Group companies, grants or gifts, among others, are not taken into account. Specifically, the figure is taken from the information on sales turnover reported in Inditex's Consolidated Annual Accounts (*Note 4*).
- **CapEx:** the denominator includes additions to assets, including those derived from business combinations and rights of use. Therefore, the Group considers all additions to property, plant and equipment, intangible assets and rights of use in accordance with IFRS 16. Specifically, the figure is taken from the information on additions reported in Inditex's Consolidated Annual Accounts (*Notes 14, 15 and 16*).
- **OpEx:** the denominator includes the expenses associated with research and development, building renovation measures, short-term leases and maintenance or repairs that ensure the proper functioning of the assets. Specifically, the figure is taken from the information on operational expenses reported in Inditex's Consolidated Annual Accounts (*Note 6*).

The results obtained for each of these key performance indicators are shown below, alongside the respective conclusions.

Turnover

In keeping with the previous information and as in previous years, no items of turnover have been identified that could be considered eligible as per the current Taxonomy framework. This means that the eligible turnover results in 2024 are approximately 0%.

CapEx

The Inditex Group considers eligible items[30] linked to the following investment types within the framework of the mitigation and adaptation objectives:

- **Renovation of existing buildings** (Activity 7.2. CCM)
- **Acquisition and ownership of buildings** (Activity 7.7. CCM)
- **Electricity generation from wind power** (Activity 4.3. CCM)
- **Installation, maintenance and repair of renewable energy technologies** (Activity 7.6. CCM)

The percentage investment in environmentally sustainable activities in 2024 (7.8%) increased with respect to that reported in 2023 (3.4%). The difference between the two results lies mainly in the inclusion of the items linked to the construction of logistics centres.

There are no Taxonomy-eligible activities that are not environmentally sustainable thanks to the Group's efforts to put in place measures to ensure current and future alignment of actions related to the acquisition and ownership of buildings (activity 7.7. CCM) with the Taxonomy's technical criteria.

OpEx

Consistent with the foregoing, the criterion for calculating OpEx is unchanged with respect to the previous year. Consequently, eligible OpEx is observed to be approximately 0% of the Inditex Group's total OpEx in 2024.

[30] As explained, some of the items linked to activities CCM 7.7. and CCM 4.3. through the investment plan are included in the numerator.

Turnover

Economic activities	Code(s) (1)	2024 Turnover	2024 Proportion of Turnover, year 2024	Substantial Contribution Criteria: Climate Change Mitigation	Substantial Contribution Criteria: Climate Change Adaptation	Substantial Contribution Criteria: Water	Substantial Contribution Criteria: Pollution	Substantial Contribution Criteria: Circular Economy	Substantial Contribution Criteria: Biodiversity	DNSH criteria ('Does Not Significantly Harm'): Climate Change Mitigation	DNSH criteria ('Does Not Significantly Harm'): Climate Change Adaptation	DNSH criteria ('Does Not Significantly Harm'): Water	DNSH criteria ('Does Not Significantly Harm'): Pollution	DNSH criteria ('Does Not Significantly Harm'): Circular Economy	DNSH criteria ('Does Not Significantly Harm'): Biodiversity	Minimum safeguards	Proportion of Taxonomy-aligned (A.1.) or -eligible (A.2.) turnover, year 2023	Category enabling activity	Category transitional activity
		M€	%	Y; N; N/EL (2)	Y; N; N/EL (2)	Y; N; N/EL (2)	Y; N; N/EL (2)	Y; N; N/EL (2)	Y; N; N/EL (2)	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)		**0.0 M€**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**								**0.0%**		
Of which Enabling		0.0 M€	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%								0.0%	E	
Of which Transitional		0.0 M€	0.0%	0.0%													0.0%		T
A.2 Taxonomy-eligible, but not environmentally sustainable activitles (not Taxonomy-aligned activities)																			
		M€	%	EL; N/EL (3)	EL; N/EL (3)	EL; N/EL (3)	EL; N/EL (3)	EL; N/EL (3)	EL; N/EL (3)										
Turnover of Taxonomy-eligible but not environmentally sustainable activitles (not Taxonomy-aligned activities) (A.2)		**0.0 M€**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**								**0.0%**		
A. Turnover of Taxonomy-eligible activities (A.1+A.2)		**0.0 M€**	**0.0%**														**0.0%**		
B. TAXONOMY NON-ELIGIBLE ACTIVITIES																			
Turnover of Taxonomy-non-eligible activities		**38,632 M€**	**100%**																
TOTAL		**38,632 M€**	**100%**																

(1) The Code constitutes the abbreviation of the relevant objective to which the economic activity is eligible to make a substantial contribution, as well as the section number of the activity in the relevant Annex covering the objective, i.e.:

— Climate change mitigation: CCM.
— Climate change adaptation: CCA.
— Water and marine resources: WTR.
— Circular economy: CE.
— Pollution prevention and control: PPC.
— Biodiversity and ecosystems: BIO.

(2) Y: yes, Taxonomy-eligible and Taxonomy-aligned activity with the relevant environmental objective.
N: no, Taxonomy-eligible but not Taxonomy-aligned activity with the relevant environmental objective.
N/EL: not eligible, Taxonomy non-eligible activity for the relevant environmental objective.

(3) EL: Taxonomy eligible activity for the relevant objective.
N/EL: Taxonomy non-eligible activity for the relevant objective.

CapEx

Economic activities	Code(s) (1)	2024 CapEx	2024 Proportion of CapEx, year 2024	Substantial Contribution Criteria: Climate Change Mitigation	Substantial Contribution Criteria: Climate Change Adaptation	Substantial Contribution Criteria: Water	Substantial Contribution Criteria: Pollution	Substantial Contribution Criteria: Circular Economy	Substantial Contribution Criteria: Biodiversity	DNSH criteria ('Does Not Significantly Harm'): Climate Change Mitigation	DNSH criteria ('Does Not Significantly Harm'): Climate Change Adaptation	DNSH criteria ('Does Not Significantly Harm'): Water	DNSH criteria ('Does Not Significantly Harm'): Pollution	DNSH criteria ('Does Not Significantly Harm'): Circular Economy	DNSH criteria ('Does Not Significantly Harm'): Biodiversity	Minimum safeguards	Proportion of Taxonomy-aligned (A.1.) or eligible (A.2.) CapEx, year 2023	Category enabling activity	Category transitional activity
		M€	%	Y; N; N/EL (2)	Y; N; N/EL (2)	Y; N; N/EL (2)	Y; N; N/EL (2)	Y; N; N/EL (2)	Y; N; N/EL (2)	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
Electricity generation from wind power	CCM 4.3.	2.3 M€	0.04%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.1%		
Renovation of existing buildings	CCM 7.2.	11.6 M€	0.2%	Y	N	N/EL	N/EL	N	N/EL	Y	Y	Y	Y	Y	Y	Y	0.2%		T
Installation, maintenance and repair of renewable energy technologies	CCM 7.6.	1.4 M€	0.03%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%	E	
Acquisition and ownership of buildings	CCM 7.7.	395.9 M€	7.5%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	3.1%		
CAPEX of environmentally sustainable activities (Taxonomy-aligned) (A.1)		**411.2 M€**	**7.8%**	**7.8%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**Y**	**Y**	**Y**	**Y**	**Y**	**Y**	**Y**	**3.4%**		
Of which Enabling (4)		1.4 M€	0.03%	0.03%	0.0%	0.0%	0.0%	0.0%	0.0%	Y	Y	Y	Y	Y	Y	Y	0.0%	E	
Of which Transitional (4)		11.6 M€	0.2%	0.2%						Y	Y	Y	Y	Y	Y	Y	0.2%		T
A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
		M€	%	EL; N/EL (3)	EL; N/EL (3)	EL; N/EL (3)	EL; N/EL (3)	EL; N/EL (3)	EL; N/EL (3)										
CAPEX of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		**0.0 M€**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**								**0.0%**		
A. CapEx of Taxonomy-eligible activities (A.1+A.2)		**411.2 M€**	**7.8%**	**7.8%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**								**3.4%**		
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
CapEx of Taxonomy-non-eligible activities		**4,867 M€**	**92.2%**																
TOTAL		**5,278 M€**	**100%**																

(1) The Code constitutes the abbreviation of the relevant objective to which the economic activity is eligible to make a substantial contribution, as well as the section number of the activity in the relevant Annex covering the objective, i.e.:

— Climate change mitigation: CCM.

— Climate change adaptation: CCA.

— Water and marine resources: WTR.

— Circular economy: CE.

— Pollution prevention and control: PPC.

— Biodiversity and ecosystems: BIO.

(2) Y: yes, Taxonomy-eligible and Taxonomy-aligned activity with the relevant environmental objective.

N: no, Taxonomy-eligible but not Taxonomy-aligned activity with the relevant environmental objective.

N/EL: not eligible, Taxonomy non-eligible activity for the relevant environmental objective.

(3) EL: Taxonomy eligible activity for the relevant objective.

N/EL: Taxonomy non-eligible activity for the relevant objective.

(4) The criteria for expressing the percentage of enabling and transition activities has been modified. Thus, the denominator used to calculate the percentages corresponds to the total CapEx. The historical data has been recalculated to make the results comparable year on year.

	Proportion of CapEx/ Total CapEx	
Objectives	**Taxonomy-aligned per objective**	**Taxonomy-elegible per objective**
CCM	7.8%	7.8%
CCA	0%	7.8%
WTR	0%	0%
CE	0%	0.2%
PPC	0%	0%
BIO	0%	0%

OpEx

Economic activities	Code(s) (1)	2024 OpEx	2024 Proportion of OpEx, year 2024	Substantial Contribution Criteria: Climate Change Mitigation	Substantial Contribution Criteria: Climate Change Adaptation	Substantial Contribution Criteria: Water	Substantial Contribution Criteria: Pollution	Substantial Contribution Criteria: Circular Economy	Substantial Contribution Criteria: Biodiversity	DNSH criteria ('Does Not Significantly Harm'): Climate Change Mitigation	DNSH criteria ('Does Not Significantly Harm'): Climate Change Adaptation	DNSH criteria ('Does Not Significantly Harm'): Water	DNSH criteria ('Does Not Significantly Harm'): Pollution	DNSH criteria ('Does Not Significantly Harm'): Circular Economy	DNSH criteria ('Does Not Significantly Harm'): Biodiversity	Minimum safeguards	Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) OpEx, year 2023	Category enabling activity	Category transitional activity
		M€	%	Y; N; N/EL (2)	Y; N; N/EL (2)	Y; N; N/EL (2)	Y; N; N/EL (2)	Y; N; N/EL (2)	Y; N; N/EL (2)	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A. TAXONOMY ELIGIBLE ACTIVITIES																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		**0.0 M€**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**								**0.0%**		
Of which Enabling		0.0 M€	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%								0.0%	E	
Of which Transitional		0.0 M€	0.0%	0.0%													0.0%		T
A.2 Taxonomy-eligible, but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
		M€	%	EL; N/EL (3)	EL; N/EL (3)	EL; N/EL (3)	EL; N/EL (3)	EL; N/EL (3)	EL; N/EL (3)										
OpEx of Taxonomy-eligible, but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		**0.0 M€**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**								**0.0%**		
A. OpEx of Taxonomy eligible activities (A.1+A.2)		**0.0 M€**	**0.0%**														**0.0%**		
B. TAXONOMY NON-ELIGIBLE ACTIVITIES																			
OpEx of Taxonomy-non-eligible activities		**1,586 M€**	**100%**																
TOTAL		**1,586 M€**	**100%**																

(1) The Code constitutes the abbreviation of the relevant objective to which the economic activity is eligible to make a substantial contribution, as well as the section number of the activity in the relevant Annex covering the objective, i.e.:

— Climate change mitigation: CCM.

— Climate change adaptation: CCA.

— Water and marine resources: WTR.

— Circular economy: CE.

— Pollution prevention and control: PPC.

— Biodiversity and ecosystems: BIO.

(2) Y: yes, Taxonomy-eligible and Taxonomy-aligned activity with the relevant environmental objective.

N: no, Taxonomy-eligible but not Taxonomy-aligned activity with the relevant environmental objective.

N/EL: not eligible, Taxonomy non-eligible activity for the relevant environmental objective.

(3) EL: Taxonomy eligible activity for the relevant objective.

N/EL: Taxonomy non-eligible activity for the relevant objective.

Other information related to Taxonomy

Information on nuclear and fossil gas activities in Annex III of Delegated Regulation 2022/1214.

Nuclear energy related activities		
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	No
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	No
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	No
Fossil gas related activities		
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	No
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	No
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	No

6. Social information
[ESRS S]

S1. Own workforce

S2. Workers in the value chain

S3. Affected communities

S4. Consumers and end-users



S1. Own workforce

A. Strategy

SBM-3. Material impacts, risks and opportunities

Our people's talent and contribution are key to Inditex's success. Consequently, we strive to prevent, mitigate and remediate potential negative impacts and their associated risks for our workforce, as well as to drive positive impacts and opportunities.

Material Impacts, Risks and Opportunities related to our people

		TYPE (I/R/O)	PHASE OF THE VALUE CHAIN	RELATED POLICIES
S1.I1	**Quality employment**	I	/ Own operations	**Transversal policies:** / Code of Conduct / Human Rights Policy / Sustainability Policy **Specific policies:** / Diversity and Inclusion Policy / Global Anti-Harassment Policy / Occupational Health and Safety Policy / Global Policy on Internal Reporting Channels / Compliance Policy regarding Personal Data Protection and Privacy / Information Security Policy
S1.I2	**Payment of adequate wages**	I	/ Own operations	
S1.I3	**Efficient mechanisms for social dialogue and respect for the rights of freedom of association and collective bargaining**	I	/ Own operations	
S1.I4	**Work-related accidents and occupational diseases**	I	/ Own operations	
S1.I5	**Professional development**	I	/ Own operations	
S1.I6	**Possible impacts on vulnerable groups**	I	/ Own operations	
S1.I7	**Possible loss of personal data**	I	/ Own operations	
S1.R1	**Risks related to human capital**	R	/ Own operations	
S1.O1	**Business development opportunities by attracting and retaining talent**	O	/ Own operations	

ⓘ More information on stakeholder engagement and our materiality assessment in section *SBM-3. Material impacts, risks and opportunities* and *IROs. Disclosures on the materiality assessment process* of this Report.

Scope

S1.SBM-3_01; S1.SBM-3_02

We have analysed the possible positive and negative impacts for our own workforce. In the context of this Report, and pursuant to the ESRS definitions, 'our own workforce' includes both employees and non-employees, hereinafter: 'our teams'.

Employees: personnel who have a direct employment relationship with the Company. Hereinafter referred to as 'our people', 'workforce' or 'employees'. This category includes the following groups, according to their job classification:

/ **Management:** employees in management positions with responsibility for interdisciplinary working groups related to the areas of design, manufacturing, distribution, logistics, stores, technology, sustainability and other general services. It also includes store management.

/ **Supervisor:** employees who are part of interdepartmental and transversal working groups for design, logistics and stores, as well as sustainability, technology and other general services.

/ **Specialist:** employees with an impact through individual contribution related to one of the Group's activities in the areas of design, manufacturing, distribution, logistics, stores, sustainability, technology and other general services.

Non-employees: other professionals who are not our own employees but that carry out activities for the Company (either by providing labour or people provided by employment companies). Hereinafter, 'other professionals' or 'non-employees'

S1.SBM-3_11

Within this scope, we identify the groups at most risk of vulnerability at the workplace and we establish measures for their protection and support. These actions are materialised in policies and best practices to prevent discrimination or harassment of any kind.

Accordingly, we work to integrate people in our teams, comprised of people of different sexes, gender identities and expressions, sexual orientations, races, ethnicities, ages, education, socio-economic status, disabilities or religions.

ⓘ More information in sections *S1-4. Actions related to own workforce* and *S1-9. Diversity metrics* of this Report.

Occurrence and types of impacts

S1.SBM-3_03

The **potential negative impacts** related to our people tend to be systemic at the global and industry level. There are also individual impacts, such as those linked to occupational accidents, cases of harassment, or protection of personal data.

To prevent both kinds of impact and mitigate the possible negative effects deriving from them, we introduce measures like internal diversity and inclusion audits, occupational accident prevention programmes and training initiatives. We also have an active role in social dialogue thanks to our collaboration with **UNI Global Union** (UNI), with whom we have a global agreement that promotes decent work and protects the labour rights of all our workforce.

S1.SBM-3_04

We also aim to generate **positive impacts** on our people. To achieve this, we implement measures to improve their quality of life and well-being, by establishing favourable working conditions, work-life balance measures or adequate wages.

We also develop initiatives focused on quality employment through social dialogue, such as the creation of our Well-being Committees; on promoting equality and inclusion in our people, as in programmes such as Salta and the INCLUYE project; and on ensuring health, safety and well-being in our workplaces.

Lastly, we are concerned about the professional development of our people. We therefore provide practical training, which is mostly given by in-house employees or developed in collaboration with top-level external entities.

ⓘ More information on actions related to our people in section *S1-4. Actions related to own workforce* of this Report.

S1.SBM-3_06

In addition, we have not identified negative impacts linked to the transition plans, nor operations or geographical areas with a significant risk of incidents of forced, compulsory or child labour among our people.

S1.SBM-3_07; S1.SBM-3_08; S1.SBM-3_09; S1.SBM-3_10

ⓘ More information in the 'Just Transition' section of our Climate Transition Plan, available on Inditex's corporate website.

Risks and opportunities

S1.SBM-3_05

Based on the analysis of impacts and dependencies, in particular those linked to the dependence on qualified personnel, we also identify the risks and opportunities associated with our people.

This allows us to work on the prevention and mitigation of risks and their associated negative effects. Part of this effort consists of ensuring favourable working conditions and robust compliance with regulations to minimise the chance of labour disputes. We also establish recruitment and retention strategies to avoid losing talented professionals; we implement communication channels to resolve disputes early on; and we carry out initiatives for the dissemination, prevention and promotion of occupational health, safety and well-being.

Moreover, we see attracting and retaining talent as a key opportunity for our business. Hence, we implement specific talent programmes such as Zara Business Graduates and Zara Boost, as well as training initiatives such as LEAP.

ⓘ More information on our actions related to our people in section *S1-4. Actions related to own workforce* of this Report.

S1.SBM-3_12

These risks and opportunities apply across the board to all our operations and do not correspond more to a specific group of people.

B. Impact, risk and opportunity management

S1-1. Policies related to own workforce

S1.MDR-P_01-06;
S1-1_01;
S1-1_02

We undertake to safeguard the rights of the people who make up Inditex and to foster continuous dialogue so as to take into account their interests. This commitment is structured around different corporate policies, based on respect for human rights; diversity, inclusion and equal opportunities; equal treatment and opportunities with regard to recruitment and promotion; health, safety and well-being; as well as information security and data protection.

Policies related to our people

/ Code of Conduct ⓘ
/ Human Rights Policy ⓘ
/ Diversity and Inclusion Policy ⓘ
/ Global Anti-Harassment Policy ⓘ
/ Occupational Health and Safety Policy ⓘ
/ Compliance Policy regarding Personal Data Protection and Privacy ⓘ
/ Information Security Policy ⓘ
/ Ethics Line Procedure ⓘ
/ Global Policy on Internal Reporting Channels ⓘ
/ Sustainability Policy ⓘ

ⓘ More information on our policies and their updates in section *MDR-P. Policies* in this Report.

Our policies are the cornerstone that allow us to:

/ Respect **human and labour rights**, rejecting, among other things, any practice of child labour, forced or compulsory labour and modern slavery.

/ Implement practices to **prevent any form of discrimination** and to promote equal opportunities in access to employment and career advancement. This involves, for example, initiatives for inclusion and accessibility to decent work for people with disabilities, as well as actions to promote the equality of people, regardless of their gender, ethnicity, sexual orientation, or any other characteristic.

/ Work to **improve satisfaction** by providing quality employment, promoting job stability, with guarantees of fair working hours, work-life balance and flexible working, as well as the payment of an adequate wage.

/ Look after the **well-being** of our teams with health and safety measures.

/ Establish effective mechanisms for **social dialogue**, encouraging collective bargaining and freedom of association.

/ Develop tools to ensure the **protection and safeguarding** of information on personal data and the privacy of our teams.

S1-1_03; S1-1_04

Respect for and promotion of the human, labour and non-labour rights of our teams is included in our Sustainability Policy and further developed in the Human Rights Policy. Hence, the Human Rights Policy, which is binding on our employees and on all those who have a relationship with the Group, enshrines Inditex's commitment to the values that these frameworks represent. For prioritisation purposes, the Policy also identifies the rights most directly connected with our main activities and the stakeholders we interact with.

The Code of Conduct, along with other internal regulations, also reflects this projection, as we strive to ensure it is upheld and fostered among our teams, with an emphasis on collaboration and respectful communication among people, both internally and externally, in line with our Diversity and Inclusion Policy.

In addition, we complement our commitment to the Global Framework Agreement with UNI Global Union for the respect and promotion of decent work and labour rights, which encourages best practices in labour relations.

S1-1_08

Our Human Rights Policy, in line with all other corporate policies, including our Sustainability Policy, expressly prohibits forced and child labour. Furthermore, we do not tolerate any form of modern slavery or human trafficking in our organisation or in our supply chain.

This rejection of any form of forced or compulsory labour is also reflected in our Code of Conduct, which details the minimum age of employment, in line with the prohibition of child labour. In this way, we ensure that we do not employ anyone under the age of 16, unless not doing so would be in breach of applicable local regulations.

ⓘ More information on the Human Rights Policy in section *MDR-P. Policies* of this Report.

S1-1_07

The commitment to respect and promote human rights in both the Group's activities and in the communities in which we operate is aligned with international benchmark principles, such as the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

S1-1_05

To ensure that our policies are known and effective, we promote **continuous dialogue** with our teams, using tools such as the Agreement with UNI Global Union, communication with the trade unions, application of our Code of Conduct, implementation of training measures, and the provision of guaranteed communication and consultation channels such as the Ethics Line. This allows us to advance in our commitment to respect and promote decent work and the labour rights of our people.

MDR-P_01; MDR-P_02; MDR-P_03; MDR-P_04; MDR-P_05

Diversity inclusion and equal opportunities

As part of our commitment to respect human rights, our regulations also include policies related to the **promotion of diversity and inclusion**, and **zero tolerance of any kind of discrimination or harassment**. These policies also embody our principles regarding training, in order to guarantee **equal opportunities and professional growth** within the Company.

Diversity and Inclusion Policy

Approved by the Board of Directors on 12 December 2017 and partially amended on 14 December 2020

Key contents	/ Promotion of diverse teams and a culture of equality, inclusion and respect, based on multiculturalism and gender diversity, gender identity and expression, race, ethnicity, age, education, socio-economic class, disability, religion, sexual orientation, etc.
Scope	/ The entire Group (companies and individuals) / We promote its application to all related natural and legal person (workers in the supply chain, customers, suppliers, contractors and those who participate in selection processes)
Accountable for the implementation	/ People department and its chief officer
Third-party standards	/ GEEIS (Gender Equality European & International Standard) and GEEIS Diversity certifications / UN Standards of Conduct for Business against LGBTQI+ discrimination at a global level
Consideration given to stakeholders	/ Engagement with our people through affinity groups, worker representatives, or through the figure of Diversity Champions

Global Anti-Harassment Policy

Approved by the Board of Directors on 15 March 2022 and updated on 7 November 2023

Key contents	/ Commitment to the prevention of harassment of any type or form / Prohibition of any kind of physical, sexual, psychological or verbal harassment or abuse to any member of our workforce, as well as any conduct that might create an intimidating, offensive or hostile work
Scope	/ The entire Group (companies and individuals), both in their relationship with other members of the Group and with any other stakeholder / People who provide services or collaborate with the Group (including the Board of Directors)
Accountable for the implementation	/ People department and its chief officer
Third-party standards	/ Convention No. 190 and Recommendation No. 206 of the ILO on violence and harassment
Consideration given to stakeholders	/ We involve workers' representatives in the advancements made in both the Policy and the Code of Conduct / Involvement through social dialogue, in the implementation of protocols against sexual harassment in the Equality Plans with trade union representatives in Spain

S1-1_10; S1-1_11

Zero tolerance approach to discrimination

We are committed to a **zero-tolerance policy towards any kind of discrimination**, and we undertake to drive diversity through a culture of inclusion, equality and respect.

This commitment is established on the basis of our Human Rights Policy, and is made effective through the application of the **Anti-Harassment Policy** and the **Diversity and Inclusion** Policy, as well as the Code of Conduct, which must be complied with by all our people.

This prohibits discrimination at all levels of the Company on the grounds of race, ethnic origin, disability, illness, religion, marital status, sexual orientation, political opinion, age, nationality, sex, gender identity and expression or for any other reason.

S1-1_12

We also recognise that people are unique in our differences and similarities. In keeping with our slogan 'We Design Opportunities for All', our Diversity and Inclusion Policy is the foundation on which to build protection and equal opportunities initiatives for especially vulnerable groups in connection with human rights.

These notably include those focused on socio-ethnic inclusion, inclusion of LGBTQI+ people and disability inclusion. Programmes such as SALTA and INCLUYE, which promote the employability and socio-labour inclusion of people who face socio-economic or educational barriers or obstacles because of a disability, are examples of this commitment.

The Policy also fosters equal treatment and opportunities for women and men in the workplace.

ⓘ More information on the *SALTA* programme in section *S1-4. Actions related to own workforce* and on the diversity target in section *S1-5/S1-12. Persons with disabilities and related target* of this Report.

S1-1_18

Moreover, one of our priorities is to comply with the principles of universal accessibility, especially for our workforce and customers who may have any kind of disability. That is why we adapt our workplace for people with disabilities or mobility issues.

S1-1_13

To apply our Policy, we develop procedures and implement training initiatives and programmes, driven by the Diversity and Inclusion department. This department is part of the Culture and Values team and is led by the person designated as **Global Diversity & Inclusion Officer**, who coordinates an international team. Among other functions, this team supports the **Diversity Champions**, who are responsible for this area in their markets, retail concepts and workplaces. In addition, to ensure transparency and independence, we have our Ethics Line.

S1-1_16

Our commitment to **diversity and inclusion** is also driven by the Board of Directors. This body adopts measures aimed at promoting diversity and avoiding discrimination of any kind, particularly on grounds of gender, when appointing members of the Board or Senior Management. The People department management defines and implements the strategies and measures to comply with the general principles set out in the Diversity and Inclusion Policy.

Equal treatment and opportunities with regard to the recruitment, training and promotion of people

S1-1_15

The Diversity and Inclusion Policy is also applicable to recruitment and selection, pay and benefits, promotions, transfers, career development and training, demotions, dismissals and other disciplinary measures.

We therefore promote initiatives to optimise individual and collective performance and spaces for the integral development of people, in keeping with a practical and adapted training model. Most training actions are led by in-house professionals, occasionally supplemented by renowned external entities.

S1-1_20;
S1-1_22

The corporate learning platform **Tra!n** is the core of our educational offering, providing an extensive catalogue of customised digital content. This tool facilitates the management of and participation in in-person training, covering strategic topics such as 'Fashion and product', 'Sustainability', 'Customer experience', 'Operations', 'Skills' and 'Digital'.

Tra!n is available in all markets where we operate, with the exception of Mainland China, which instead uses Grow, a local platform that offers training aligned with Tra!n standards and targets. This multinational approach ensures homogeneous access to development opportunities, adapted to each geography. It also helps us to offer a wide range of customised digital content, facilitating the registration of online and in-person training courses.

In addition to advancing training, we foster internal promotion and mobility so that our people can evolve.

ⓘ More information on training in sections *S1-4. Actions related to own workforce* and *S1-13. Training and skills development metrics* of this Report.

Awareness

S1-1_17

Training our people in diversity and inclusion is essential to create an inclusive culture and make spaces free of any kind of discrimination. In 2024, 98,749 people from all over the world accessed training on diversity and inclusion in this connection.

In 2023 we launched the **Diversity and Inclusion Channel**, a specific training channel. It covers mandatory training on diversity, equity and inclusion, including the basics of our Diversity and Inclusion Policy. Furthermore, in 2024 we added training on disability inclusion at the global level and another on inclusive language in Spanish-speaking countries. In total, 74,064 people, including 7,120 team supervisors or management, that have taken at least one of these courses.

Our catalogue of mandatory training also includes training on the Global Anti-Harassment Policy and specific content on diversity and inclusion for people in leadership positions. For example, the company's senior management programme developed in collaboration with IE Business School, in which 113 executives attended training in 2024, includes a specific module on inclusive leadership and the promotion of inclusive and equitable work environments, led by the Global Diversity & Inclusion Officer.

Health, safety and well-being

As part of our unwavering commitment to people's health, safety and well-being, we apply international standards and focus on measures to identify and mitigate risks, foster a culture of safety, training and skill-building, along with health and well-being programmes, among other initiatives.

Occupational Health and Safety Policy

Approved by the Board of Directors on 10 September 2019 and updated on 13 December 2022

Key contents	/ Commitment to and continuous improvement of workplace well-being, health and safety / Effective management of workplace accidents and occupational illnesses / Foundation for our occupational health and safety management systems
Scope	/ The entire Group (companies and individuals)
Accountable for the implementation	/ People department and its chief officer
Third-party standards	/ ISO 45001
Consideration given to stakeholders	/ Involvement through occupational health and safety training and management plans, with the participation of stakeholders

S1-1_09

In addition to the Occupational Health and Safety Policy, we have an occupational health and safety management system, certified to ISO 45001 standard. This system optimises the monitoring of safety conditions in the workplace to reduce incidents and aims to increase workers' participation in health-promoting activities, including emergency and first aid training.

Information security and data protection

Data protection and privacy, in particular in respect of our people and customers, is of paramount importance for Inditex. Accordingly, the following policies reflect best practices in connection with information security:

/ **Compliance Policy regarding Personal Data Protection and Privacy:** in line with our Code of Conduct, it sets out our mission to respect privacy and protect personal data, in particular with respect to the risk of data loss as a result of cybersecurity vulnerabilities.

/ **Information Security Policy:** it ensures the protection of information, regardless of how it is communicated, shared, projected or stored. This protection covers both the information inside the Group and the information shared with third parties.

ⓘ More information in section *S4-1. Policies related to consumers* of this Report.

Grievance mechanisms

S1-1_06;
S1-1_21

Grievance mechanisms are key to help identify potential negative impacts and develop plans for their prevention, mitigation and remediation, while tackling any associated risks at the same time. The **Ethics Line** is available to our people as an effective and accessible **communication channel** to confidentially communicate their queries and/or doubts regarding the interpretation of our policies, or breaches and other non-compliances relating to the legal system, our Codes of Conduct or any other internal regulations.

ⓘ More information on how the Ethics Line works in section *G1-1. Corporate culture and business conduct* of this Report.

Communication of policies

S1-1_14

All our policies can be found on the Group's intranet and corporate website and are available in a wide range of languages to provide access to any stakeholder, whether internal or external.

Furthermore, to ensure that all our teams are aware of corporate policies and their updates, we make use of training and monitoring plans, as well as other internal communication initiatives.

ⓘ More information in section *G1-3. Prevention and detection of corruption and bribery* of this Report.

S1-2. Processes for engaging with own workforce

S1-2_01; S1-2_02

At Inditex we believe that it is essential **to listen to and involve** our people to correctly manage the actual and potential impacts on them. That is why we have relationship and dialogue mechanisms that help us to ensure that their perspectives are heard and incorporated into our decision making. These include:

/ Social dialogue mechanisms

Our commitment to the right of participation is regulated by the Code of Conduct. In its section on adequate working conditions, we guarantee the right of all workers to join, associate with and/or create the trade union of their choice, as well as the right to collective bargaining. The Code also encompasses respect for employees' right to have trade unions and workers' representatives represent them and negotiate their working conditions collectively.

In turn, we also have an active role in social dialogue through our relationship with UNI Global Union and the constitution of the Company's European Works Council (EWC), a body for assurance and effectiveness of information and consultation of workers on transnational issues. The section on 'Agreements with our people' contains more details on these mechanisms.

/ Internal communication with our people

INET, our main internal communication channel is a tool that allows us to connect with our people and enhance their engagement. We also have **internal communication spaces for each brand**, which connect all our stores, and we are making progress in the deployment of our internal social network **InStories.**

In addition, to ascertain our people's perception of their experience at the Company, we developed '**Your opinion matters to us**', an anonymous survey that we send to store employees when they leave Inditex. Launched in 2016 and available in all our markets with own stores, it allows us to learn their opinion on aspects such as the relationship with other members of their team or managers, their training, salary or how well their working hours suit their availability.

Over the course of 2024, we received around 22,000 responses. In addition, the question 'Would you recommend Inditex as a place to work?' is used to measure our people engagement. In 2024, this question obtained an average of 74% positive responses (71% in 2023), obtaining 97% positive responses in Spain (93% in 2023).

/ Ethics Committee

The Ethics Committee is the internal body in charge of managing the Ethics Line, our main internal grievance mechanism. Thanks to its work, we can gather all information related to possible breaches of our Code of Conduct, as well as any concerns or violations of our people's rights. This information is crucial to identify potential negative impacts on our people and other professionals.

ⓘ More information on the Ethics Committee and the Ethics Line in section *G1-1. Corporate culture and business conduct* of this Report.

/ People department

This team, present in each of the markets where we have own workforce, is the first contact point for our people, ensuring an ongoing and direct relationship with those who work in the Group.

S1-2_03; S1-2_14

Accordingly, our strategy for relationships with our people includes **constant communication** through tools such as the Agreement with UNI Global Union, the European Works Council (EWC), in-house training and promotion and internal communications. We also carry out one-off communications such as those linked to cases received via the Ethics Line.

Furthermore, we train the people responsible for these dialogue processes internally to ensure that we have functional mechanisms in place and that the relationship and dialogue processes with our people and/or the organisations representing their interests are conducted from a position of respect and protection of human rights.

By using these tools, we can involve our people in managing impacts, factoring their views into the development and evaluation phases of impact prevention and mitigation strategies.

S1-2_04

Responsibility for relationships with our people lies with the Inditex Group's Chief People Officer, except for the Ethics Line, which is outside the realm of responsibility of that role.

Agreements with our people

S1-2_05

Inditex plays an active part in the social dialogue through its relationship with **UNI Global Union** (UNI). In 2009, Inditex and UNI signed a Global Agreement for the respect and promotion of decent work and labour rights, which covers 100% of the Group's workforce and was renewed in 2024 to mark the 15th anniversary. UNI is a network of trade unions in the trade and retail sector which represents more than 20 million workers across 150 countries.

The Agreement, applicable to the entire Group workforce and whose principles will be applicable to franchises, subcontractors and suppliers of services, sets out the minimum rights and respect for statutory, contractual or collective agreement provisions that confer higher rights, in matters such as working hours or the protection of a safe, healthy and sustainable working environment, and promotion of best practices for occupational health and safety with the appropriate equipment and training.

This Agreement with UNI refers to a number of issues governed pursuant to the principles established by the ILO:

- **Freedom of association and the right to collective:** bargaining: specific mention is made to the application of ILO Conventions No. 87 and 98, stating that 'Inditex recognises the right of trade unions to represent workers and to regulate through collective bargaining the terms and conditions of their employment'.
- **Freedom to join any trade union:** in addition to guaranteeing this freedom, non-discrimination due to membership is also guaranteed.
- **Wage:** when setting the wages of the people working for the Inditex Group, in addition to the provisions of international labour standards and those arising from national legislation and collective bargaining agreements, Inditex shall also take into account the definition of the minimum living wage, as endorsed by the ILO Governing Body in session on 13 March 2024.
- **Working hours:** Inditex undertakes to comply with the requirements set by national law and national collective bargaining agreements (ILO Conventions No. 1 and 47 and Recommendation No. 116) on working hours.

Furthermore, since 2015 we have an agreement in place with UNI, the US trade union United Food and Commercial Workers International Union (UFCW) and Zara USA, which led to the approval of a collective agreement for the US stores.

In **Spain**, a significant agreement on working conditions for store staff was also reached: the State Collective Agreement for the Improvement and Standardisation of the Remuneration and Social Conditions of the Employees, signed in 2023 by the leading trade unions and the Group's brands.

In turn, on 10 July 2024, an agreement was reached with the Federation of Services of the trade union *Comisiones Obreras*, applicable to the store employees of the retail concepts, concerning the management of the experience of senior staff in matters relating to the guarantee of continuity and reduction of working hours due to age. Its most relevant aspects are: minimum guarantee of continuity after 8 years in the Company; loyalty bonus after 20 and 25 years; and reduction of working hours from 2025 onwards upon turning 55 for those with at least 10 years of seniority.

Moreover, since 2023, the Group has a **Equality Plan** in Spain. The key aspect of this Plan is that it encompasses all retail concepts and central services, thus unifying the provisions under previous plans. This Plan coexists with the equality plans already in place at all our logistics centres and factories and has the following aim:

- To guarantee the **principle of equal treatment**, applying the gender perspective in terms of access, job performance and professional development at all levels and at all stages of the professional career.
- To apply the **gender perspective** to all areas, consolidating an environment that fosters the co-responsible exercise of the rights to a personal, family and work-life balance and avoiding any type of discrimination or unfavourable treatment related to pregnancy, maternity and breastfeeding.
- To continue to guarantee **equal pay** for equal work.
- To promote an **equality culture** within the company through the dissemination of the values of gender equality and non-discrimination of any person.
- To consolidate an **inclusive, non-sexist and non-discriminatory** internal and external communication, disseminating an image of the company in which there is respect for women and men and for equal opportunities.
- To **prevent and penalise** sexual or gender-based harassment.

ⓘ More information on the measures established in terms of work-life balance after the signing of the Group's Equality Plan in Spain in section *S1-15. Work-life balance metrics* of this Report.

S1-2_06; S1-2_15

With regard to the assessment of the existing mechanisms for social relations and dialogue, proof of their effectiveness can be seen in the reaching of agreements with our workforce that are beneficial to both parties. Along these lines, in 2019 we set up the **Company's European Works Council (EWC)**, a body for assurance and effectiveness of information and consultation of workers on transnational issues.

To preserve the health of social dialogue at the local level at Inditex subsidiaries, training is provided to our People and store managers areas concerning trade union rights and cooperation with our workforce's legal representatives. Thus, the works councils and management of our subsidiaries meet periodically to inform, consult and listen to the union representatives and reach agreements to improve people's working conditions and quality of life.

For example, in 2024, the **Mexico** subsidiary reached an agreement to sign a collective work contract with the Justo Sierra trade union, which must be approved at each store, with the aim of regulating relations between the workforce and the Company. In the **United States**, the renegotiation of the agreements is yielding benefits such as guaranteed wage increase based on seniority; extended leave for illness or the death of a family member; union leave with reinstatement for New York and New Jersey trade unions; and the reimbursement of parking expenses for people who cannot access free parking facilities or public transport.

Moreover, to improve work-life balance, additional rest measures were approved for full-time and part-time employees in the United States. Additionally, in **France**, a new seniority bonus for 25 years with the Company has been agreed with the representative trade unions.

Communication with our people

S1-2_11; S1-2_12

We are mindful that, to achieve quality communication with our workforce, we must overcome barriers such as cultural differences or language. Consequently, among other measures, we have initiatives, including cultural actions with adapted content and initiatives, and we rely on our People team to maintain personal and direct dialogue.

Our people also have access to INET, our main internal communication channel. Available in website and app format and in as many as 23 languages. This tool allows us to communicate Group news in real time, simplify and digitalise the day-to-day processes of our people or strengthen connections between our employees.

Plus, **our brand-specific channels** —Dear Team for Zara, MD Journal for Massimo Dutti, Oysho News for Oysho, #tengoalgoquecontarte for Zara Home and Stradi People for Stradivarius— adapt commercial messages to the identity of each brand and the particularities of each market. This allows team managers to enrich their meetings with updated and relevant content. We have also customised one of our key internal channels —**Dear Team**— creating a space exclusively for sales reps. This approach responds to the need to provide job-specific content that facilitates access to information and decision-making.

In 2024 we continued to roll out **InStories**, our internal social network, in four new markets: Switzerland; Hong Kong SAR; Taiwan, China; and Macao SAR, reaching a total of 37 markets. This tool allows us to meet people in the Group from anywhere in the world through photos and videos, follow our *hashtags* and take part in challenges and campaigns.

Communication with our people: vulnerable groups

S1-2_07

At Inditex we work to ensure that people at risk or in vulnerable situations have **access to equal opportunities** and work in a **safe environment free from discrimination**. Accordingly, under our Diversity and Inclusion strategy, we see it as important to actively listen to our people, especially groups potentially vulnerable to impacts or at greater risk, such as migrants, groups at risk or in a situation of social exclusion, people with disabilities or members of the LGBTQI+ community.

In 2024, we have made a concerted effort to promote the participation of people from these groups in internal and external communication materials, where they have shared their testimonies in videos, articles, and posts on corporate social networks. Our **Voices of Pride** capaigns, which give a voice to four people from the LGBTQI+ community in Spain, Brazil, the Netherlands and Germany, and **Voices of Inclusion**, featuring five people with disabilities from our workforce in Portugal, the United Kingdom, Greece, South Korea and Brazil, are a reflection of this commitment to empowering and giving a voice to people who may face obstacles to professional development and full social inclusion.

Likewise, our socio-labour inclusion programmes such as SALTA and INCLUYE are designed to receive the perspective of our people, and incorporate monitoring and support tools, such as mentoring and tutoring, which are provided by both internal staff and external partners, as well as dialogue sessions.

S1-2_10

In this context, we work with expert organisations to accompany the participants in our initiatives. These organisations also share their views to help us to improve our programmes. Thus, we collaborate with global and regional organisations that focus on fighting against discrimination and promoting equality in all areas: racial, gender, sexual orientation, gender identity, disability, etc. Foundations such as the European Network Against Racism (ENAR) in Europe and The Legal Defense Fund (LDF) in the United States advocate for the development of campaigns and programmes to raise awareness about racism and discrimination

ⓘ More information on related actions in section *S1-4. Actions related to own workforce* of this Report.

S1-3. Processes to remediate negative impacts and channels for own workers to raise concerns

Processes to remediate negative impacts

S1-3_01

We identify our potential and actual negative impacts not only to prevent them, but also to mitigate and remedy their effects, should they occur. Our actions therefore seek to minimise the potential negative impact of our activities.

This is reflected in our relationship with our teams, to whom we apply special protection. We do this by developing human rights due diligence processes and activating grievance mechanisms that enable us to identify negative impacts affecting our workforce and act accordingly.

ⓘ More information in section *GOV-4. Statement on due diligence* of this Report.

Main communication and grievance mechanisms

S1-3_02;
S1-3_04;
S1-3_05;
S1-3_06;
S1-3_07;
S1-3_09

All our teams have access to the **Ethics Line**, as do all our stakeholders. The procedure for handling the concerns and reports received through the Ethics Line and ensuring the channel's efficacy is the same as for those received from other stakeholders and is outlined in the relevant chapter of this Report.

S1-3_03

They may also use third-party reporting channels that have been appointed by the relevant authorities, including the institutions, bodies and agencies of the European Union.

S1-3_08

In order to ensure that everyone in our workforce are aware of our Ethics Line, in addition to including information and facilitating access to it via INET and our website, we carry out training, awareness and communication activities that are key to building and strengthening our corporate ethical culture. This training, included in the Compliance Training Plan, is adapted to the risk profile of the different groups of employees that form part of the Inditex Group.

In 2024, we also carried out awareness and communication initiatives for those working in stores and subsidiary offices. An example of this is the use of specific signage announcing the existence of the Ethics Line in rest areas and common spaces.

ⓘ More information on how the Ethics Line works, including monitoring, control and assurance of its effectiveness, in section *G1-1. Corporate culture and business conduct* of this Report and on compliance training, awareness and sensitisation in section *G1-3. Prevention and detection of corruption and bribery* of this Report.

S1-4. Actions related to own workforce

S1-4_01;
S1-4_02;
S1-4_05;
S1-4_08;
S1-4_09;
S1-4_10

In terms of **prevention and mitigation** of our negative impacts, we focus our efforts on guaranteeing equal pay and preventing the gender gap in our people, minimising the risk of accidents and occupational diseases, ensuring protection against situations of harassment at work, the demotivation of our workforce due to a lack of training and the problems arising from the loss of data.

To influence these issues, we carry out various actions, including promoting internal audits focused on diversity and inclusion, developing our Equality Plan in Spain, implementing measures to prevent accidents and our many training initiatives.

We also protect human rights and prevent their infringement, and specifically we establish prevention measures to banish child or forced labour, among others.

Our actions are designed to manage our impacts, risks and opportunities, both potential and actual. Where the impact has already occurred, we apply actions from a dual perspective of remedying the negative effect and preventing its recurrence.

This is the case with health, safety and well-being initiatives for our workforce, which seek to act in occupational accidents and diseases, or with initiatives related to the management and prevention of workplace harassment.

S1-4_06

With regard to risk prevention and mitigation, we promote a favourable workplace and strictly comply with labour regulations, thereby reducing the risk of labour disputes. We also develop strategies to attract and retain talent, and implement effective communication channels to facilitate early resolution of potential discrepancies. We are also working on measures for outreach, prevention and promotion of occupational health, safety and well-being.

S1-4_03

In addition to preventing and mitigating any negative impacts deriving from our activity, at Inditex we are committed to **maximising the positive impact** that we can pass on to our teams.

In order to do so, we carry out initiatives that allow us to have a positive impact on our people. Among them, we would like to highlight our efforts to guarantee diversity, equality and inclusion in our Company, such as our Salta programme, for the employment of vulnerable groups; the INCLUYE project, for the inclusion of people with disabilities; and the Woman in Tech and Technovation Girls initiatives, focused on empowering women and girls and showcasing female talent in tech and entrepreneurship.

S1-4_07

As an opportunity, we identify the **attraction and retention of talent** as a key factor in driving the development of our business. We therefore carry out strategic actions, such as our specialised talent programmes Zara Business Graduates and Zara Boost, and training initiatives such as LEAP, etc.

S1-4_04;
S1-4_12

It is important to note that we follow up each of our actions and their outputs. This means that we can prolong initiatives that generate a real positive impact and eliminate or improve on those that do not obtain the expected performance.

Through this monitoring, we see continued progress in the relationship with our workforce, in the form of year-on-year growth in participation, as in the case of actions linked to health, safety and well-being or training initiatives. Our actions also allow us to contribute to our targets and commitments in relation to our people. A clear example is the effectiveness of our disability inclusion initiatives, which has enabled us to reach our recruitment target in 2024.

ⓘ More information in section *S1-5/S1-12. Persons with disabilities and related target* of this Report.

S1-4_18

We also design our actions in consideration of the UN Sustainable Development Goals (SDGs). Through our workforce-related initiatives, we contributed to the following SDGs in 2024:



Diversity and inclusion

Our people are at the heart of our commitment to diversity and inclusion, which is why we have developed a strategy based on the following four global pillars:



/ Gender equality **/ LGBTQI+ inclusion** **/ Socio-ethnic inclusion** **/ Disability inclusion**

S1.MDR-A_01-12

/ Key action for gender equality: promoting STEM talent

Related IROs: [S1.I1; S1.I2; S1.I3; S1.I5; S1.I6; S1.R1; S1.O1]

MDR-A_01; MDR-A_02; MDR-A_03, MDR-A_04; MDR-A_05

Mindful of the challenge posed by attracting and retaining female talent with technological profiles, since 2020 we have been actively working to boost the professional careers of women in technological areas so as to promote the value of diversity and inclusion and have an impact on the Company and society.

Thanks to the internal initiative **Women in Tech**, our work is grounded on two pillars: the need to influence society, supporting actions that encourage girls to take an interest in science and technology; and the impact on women in the field of technology through actions that empower them. Internally, we develop projects that showcase the importance of gender equality in this field, and our talent pool promotes fairness and diversity within the technology team. Accordingly, in this year's junior programmes, we recruited a 58% of women, addressing our internal ambition of increasing the proportion of women in technology and related positions.

Also in the STEM field, in 2024 we have supported the **Technovation Girls** project for the third consecutive year. This entrepreneurship and innovation programme invites girls aged between eight to 18 to learn and develop skills for using technology to solve problems, with the aim of reducing gender gap in tech. This collaboration was carried out through the sponsorship of Power to Code, an ambassador organisation for this initiative in Spain.

/ Key action for LGBTQI+ inclusion: I AM PROUD project

Related IROs: [S1.I1; S1.I3; S1.I6; S1.R1; S1.O1]

MDR-A_01; MDR-A_02; MDR-A_03; MDR-A_04; MDR-A_05

Through our corporate project I AM PROUD, we nurture **inclusive environments where everyone feels welcome** and where prejudice, gender stereotypes and discrimination based on gender identity and sexual orientation are addressed. In 2024, on the occasion of International LGBTQI+ Pride Day, many of our subsidiaries actively participated in various celebrations, talks and meetings to reflect on the importance of allies in creating more inclusive work environments.

In order to prevent all discrimination against members of the LGBTQI+ community, and in particular transgender and non-binary people, we continued to strengthen our internal inclusion policies. Therefore, we are adapting our systems so that our people can express their gender identity within a spectrum of options ranging from binary ('Male' and 'Female') to 'Non-Binary' and 'Other/Unspecified'. This option is already available in 10 markets. In 2024 the figures showed 0.02% people who identify as non-binary gender, and 0.50% as unspecified gender/other (0.02% and 0.01% respectively in 2023).

/ Key action for socio-ethnic inclusion: SALTA programme

Related IROs: [S1.I1; S1.I3; S1.I6; S1.R1; S1.O1]

MDR-A_01; MDR-A_02

To promote the integration of groups at risk or in a situation of social exclusion and to reduce inequalities, we have employability programmes, most notably the SALTA programme, focusing on the **socio-occupational inclusion of vulnerable groups**. The purpose of SALTA is to generate job opportunities in our stores, logistics centres and factories for these people, paving the way for their professional development, or at the Company or in any other opportunity that allows them to re-enter the labour market and continue advancing to make a qualitative leap ('salto') in their lives. At Inditex we know that migrants and refugees are one of the groups most vulnerable to discrimination and racism at work. For this reason, a large majority of editions in recent years have focused on this group.

In SALTA we work with various NGOs that support us in the process of selection, training and follow-up of the participants. Set up in France in 2008, this programme was present in 21 markets[31] in 2024.

MDR-A_03; MDR-A_04; MDR-A_05

As a result of this initiative, since 2008 **more than 1,900 people** have joined our teams in stores, logistics platforms and factories, and more than 4,000 people have taken part in this project as mentors, trainers or tutors.

With regard to the monitoring of socio-ethnic inclusion, it is worth mentioning that in most markets, and especially in Europe, the privacy and personal data protection regulations do not allow companies to compile data containing ethnic or racial criteria. However, in markets like the United States and South Africa, the legislation on equality and non-discrimination places the emphasis on knowing the individual's ethnic and racial identity so as to ensure equal opportunities and rights.

[31] France, Spain, Italy, Portugal, Poland, Brazil, the United States, the United Kingdom, Germany, Mexico, Greece, South Korea, Türkiye, Romania, India, Kazakhstan, Canada, Croatia, Australia, Czech Republic and Switzerland.

United States	**2024**	**2023**
Ethnic or racial group	**%**	**%**
Hispanic or Latino	48.8%	48.6%
Black or African American	21.0%	18.9%
White	14.7%	14.9%
Asian	9.8%	9.4%
Two or More Races	5.2%	4.8%
American Indian/Alaska Native	0.3%	0.2%
Native Hawaiian/Pacific Islander	0.3%	0.3%
Not Specified	0.0%	2.9%
Total	**100%**	**100%**

South Africa	**2024**	**2023**
Ethnic or racial group	**%**	**%**
Black South Africans	88.9%	89.0%
Coloured South Africans	7.3%	6.9%
Indian/Asian South Africans	1.2%	1.8%
White South Africans	1.0%	0.9%
Foreign Nationals	1.6%	1.4%
Total	**100%**	**100%**

/ Key actions for disability inclusion: The INCLUYE Programme and Impact Week

Related IROs: [S1.I1; S1.I3; S1.I6; S1.R1; S1.O1]

MDR-A_01; MDR-A_02; MDR-A_03

The **INCLUYE** programme, created in 2021, drives the socio-occupational integration of people with disabilities. Since 2022, all Inditex's direct employability projects worldwide were grouped together and consolidated under the umbrella of this programme, which is expanding to ensure the sustainable and lasting inclusion of people with disabilities, having a global impact. Based on supported employment methodology, the programme involves local organisations that work to achieve the occupational integration of people with disabilities, and accompany them in their integration as a key factor for successful employability.

Furthermore, with the aim of promoting the full inclusion of people with disabilities in our workforce, in October 2024, for the fifth consecutive year, we held the Impact Week worldwide, focusing on disability inclusion. The purpose of this initiative is to raise awareness and mobilise our workforce to continue to promote accessibility projects, customer experience and inclusion of people with disabilities, thereby helping to break down barriers and foster equal opportunities.

MDR-A_04; MDR-A_05

ⓘ More information on the related metrics and targets in sections *S1-5/S1-12. Persons with disabilities and related target* of this Report.

In addition to these initiatives, we develop other social and labour market integration projects such as **for&from**, which generates synergies with non-profit organisations by opening stores staffed by people with different types of disabilities, with the commercial support of our concepts.

This collaborative model allows us, on the one hand, to generate employment opportunities for people with disabilities, and, on the other, to ensure revenues for the organisations themselves to continue to fund new projects and strengthen this associative fabric. In 2024, we opened the first for&from store in Mexico, bringing the total to 16 stores in Spain, Italy, Mexico and Portugal.

ⓘ More information on the for&from initiative in section *S3-4. Actions related to communities* of this Report.

ⓘ More information on actions related to diversity and inclusion in the report *Diversity and Inclusion* published on the Inditex corporate website.

Talent, promotion and training

Talent recruitment programmes

Related IROs: [S1.I5; S1.O1]

MDR-A_01;
MDR-A_02;
MDR-A_03;
MDR-A_04;
MDR-A_05

/ Talent programmes

Collaboration with universities and schools is a key part of our strategy for attracting talent. We have different programmes that help incorporate talent to our creative, technological and business areas. These notably include:

- **Creatives programme:** this year we designed The House, an experience focused on giving participants a broader vision of the sector and sharing with them concepts that are fundamental in their day-to-day lives as creative people. In 2024 we reached out to more than 25 international fashion schools, complementing the selection process with talks and workshops involving our sustainability people to share our approach to this strategic aspect in the creation of our products.
- **Business talent programme:** our programme for final year students of bachelor's/master's degrees in management or engineering, offering them their first work experience in areas such as International sales, Purchasing, Distribution, Management control, Finance or Logistics. To connect more with them, this year we organised a live event in which more than 1,000 people participated, where we talked about our values and company culture, as well as the Zara Talent programme.
- **Technological talent programme: a**s part of Zara Boost, we highlight University Colab, an initiative that has allowed students to complete their final dissertation with Inditex, in areas such as software development, data and cybersecurity. We also aim to continue fostering and nurturing female STEM talent, which is why we have launched programmes such as Ambassador.

Training, promotion and talent development programmes

Related IROs: [S1.I5; S1.R1; S1.O1]

MDR-A_01;
MDR-A_02;
MDR-A_03

/ Promotion and talent development programmes

- **Boost the Change**

Since 2021, we have focused on developing communities and activities that foster the culture necessary to enact change, starting with the Group's stores and ending with the consolidation of these networks for change in all our offices.

Changemakers is the community leading the cultural transformation from the heart of our business, our stores. Changemakers are curious people committed to sustainability, diversity and inclusion, who dedicate part of their working day to keeping abreast of sustainability and fashion issues, training their store teams and rolling out initiatives that make sustainability a reality in their work environment.

We work to identify, analyse and materialise each of the initiatives proposed by Changemakers. To do so, we have developed the Boost the Change platform, which shows in real time and in all our Company's languages what is happening in matters of sustainability, diversity and inclusion, at each store. Thanks to this programme, in the last year we helped improve waste management in the stores, inclusion in our fitting rooms and internal procedures for garment care.

At the end of 2024, this project has been implemented at all the stores in the markets in which Zara and Stradivarius are present. We also extended its rollout to include Zara Home, Massimo Dutti, Bershka, Oysho and Pull&Bear. Inditex therefore now has more than 3,000 Changemakers and we plan to consolidate the Changemaker community across all the Group's stores and markets in future exercises.

- **InTalent**

InTalent, our Marketplace for in-house opportunities, is essential to structure the path of internal promotion for our workforce. This year we continued our efforts to get to know our people better through their InTalent profile. In 2024 we had more than 40,000 people with an updated profile and more than 7,500 internal opportunities were posted.

- **LEAP**.

This year, LEAP&Co, our in-store internal talent management tool, has been transformed into **LEAP**, in what was a complete overhaul of the internal development tool for more than 55,000 employees worldwide. This new version offers a more intuitive, clear and customisable experience, designed by the users themselves. This year LEAP has added two new modules: MISSION Module, for an immersion in the employee's future position before the end of their plan, and STORE VISIT Module, providing 360° training for future store managers. In addition to being used at Zara and Zara Home, LEAP has now also been introduced at Massimo Dutti. Through 51 markets in Europe, America and Asia, in 2024 LEAP generated more than 200,000 training hours.

- **Zara Campus**

Zara Campus is a project designed to respond to training and development needs among new promotions and people in management positions in stores. This training is conducted in our Campus stores, which are Zara stores used as a practical scenario for training our managers in three areas (management, sales and operations). Throughout the year, our store teams receive training, led by tutors trained by our Campus team, who are responsible for conveying this knowledge to their teams. Also included are group sessions on communication and leadership, designed specifically for positions of responsibility, promoting team work.

In addition to LEAP and Campus Zara, we have other projects focused on developing the talent of people working in stores, including Visual Commercial to the Spotlight, Opening Support and Move.

MDR-A_01;
MDR-A_02;
MDR-A_03

Training programmes

- **Sustainability training**

In 2024, as part of our space dedicated to sustainability training and innovation, **The Sustainable Fashion School (SFS)**, we started the third edition of the Foundations of Textile Manufacturing Master's programme, devised in collaboration with the University of Leeds. More than 450 people completed the course, adding to the 1,217 graduates of previous editions, making it the leading training programme for our product teams.

To supplement this theoretical training and as part of The Sustainable Fashion School (SFS), in 2024 we launched a new learning format, called SFS Bootcamp. These are immersions in our supply chain factories giving participants hands-on experience of the main processes that our products go through and enabling them to share technical and sustainability concerns with professionals from the sector. Over the course of 2024 we held 22 bootcamps, where more than 250 people had the chance to experience first-hand some of the content learned in the training.

- **School of Leadership**

The purpose of the School of Leadership is to identify and develop the leaders of the future, ensuring that they understand their key role in affirming our identity and creating opportunities for change. To this end, we have created an integrated learning space in which we combine various approaches and methodologies to design high-impact initiatives. All our programmes are structured around the Company's four pillars of leadership: SELF, TEAM, IMPACT and TRANSFORM. Thus, we cultivate leaders able to self-manage, drive their teams, influence their environment and promote strategic change in the organisation.

This year, more than 1,000 leaders were trained through the School of Leadership's various programmes, impacting on all groups at the Company, including employees at stores, central offices, and structural and logistics areas.

In addition to these actions, we carried out other initiatives through which we provide training to our employees on specific topics. These include the **training and education of our people to carry out tasks in a safe and healthy** manner, training in sustainability, diversity and inclusion o**r corporate training in compliance.**

MDR-A_04;
MDR-A_05

Some of these actions' outputs are:

- **Increase the number of training hours**: in 2024 we held 3,292,787 training hours (2,782,830 in 2023).

- **Increase the number of training hours per person:** in 2024, the number of training hours per person was 20.3 (17.2 in 2023).

- **Enhance internal promotion:** in 2024, 70% of the Group's vacancies were filled internally, which means that more than 9,300 employees were promoted over the course of the year. By gender, 73% of the promotions were for women, 27% for men, 0.02% for non-binary people and 0.04% for other-unspecified gender. These figures are consistent with the gender distribution of our workforce. This commitment to generating opportunities for internal development results, in our office people, in more than 680 promotions and more than 2,000 changes of functions, department, retail format or market.

ⓘ More information on other training initiatives in section *S1-13. Training and skills development metrics* of this Report.

Health, safety and well-being

We continue to advance in our firm commitment to the health, safety and well-being of our people, by implementing international regulations, guaranteeing compliance with the most exacting standards and putting in place continuous improvement indicators as part of the ISO 45001:2018 management system.

We endeavour to implement proactive measures to identify and mitigate potential risks, as well as to nurture a culture of safety, health and well-being that fosters individual and collective responsibility. After listening to our teams and conducting periodic risk assessments and incident analyses, we undertake to identify areas for improvement and to implement corrective measures in a timely and effective manner.

Some of the health, safety and well-being actions were:

MDR-A_01; MDR-A_02; MDR-A_03

/ Training and education of employees to perform tasks in a safe and healthy manner

Related IROs: [S1.I4; S1.R1]

Continuous health and safety training remains vital both for reducing accidents and empowering our teams. Accordingly, we provide training programmes tailored to a variety of tasks and positions, with objectives ranging from the initial training to the essential training needed to work safely. Occupational health and safety skills and qualifications form a specialised body of knowledge that ensures that our teams are properly equipped to understand and prevent risks in their working environment.

These programmes include, among others, first aid training, specific training for handling machinery and equipment, and periodic refresher sessions on safety and emergency procedures.

MDR-A_04; MDR-A_05

In 2024, a total of 190,589 employees took part, accumulating 155,784 training hours (179,881 participants and 148,152 training hours in 2023).

/ Promoting well-being

MDR-A_01; MDR-A_02; MDR-A_03; MDR-A_04; MDR-A_05

Related IROs: [S1.I3; S1.I4; S1.R1]

- **Inditex, Healthy Organisation**

As part of our ongoing commitment to promoting and caring for the safety, health and well-being of our community, Inditex has strengthened its position as a Healthy Organisation. This annual recognition underscores our comprehensive management approach, addressing both physical and psychosocial aspects, allocating significant resources to our teams' well-being and fostering their active engagement in the community.

In fact, the companies in Spain and the rest of markets that were certified in 2023 have renewed their certification[32] as a Healthy Organisation in 2024, with the ambition for 2025 to include certification in Austria, Brazil, the United States, France, Hungary, Kazakhstan, the Netherlands and North Macedonia.

- **Workplace well-being programmes**

With the aim of promoting health and healthy habits among our people, Inditex has the **InHealth** Portal, available in 28 markets. In 2024 it was rolled out in Serbia, Montenegro, New Zealand and Australia. Next year we plan to deploy it in another 17 new markets. This platform features news, actions and challenges adapted to the workplace, cultivating a balance between body, mind and emotions.

[32] Germany, Bulgaria, Canada, Chile, Mainland China, Croatia, Spain, Greece, India, Ireland, Italy, Japan, Luxembourg, Mexico, Poland, Portugal, United Kingdom, Romania and Türkiye.

Furthermore, as part of our commitment to caring for the health of our people, we continue to offer the **Open Salud** platform, which is available to people working in the stores of all the Group's brands in Spain. This tool provides medical consultations with specialists in general medicine, dermatology, traumatology, psychology and nutrition. The tool has 6,320 users and 11,676 consultations, improving growth compared to 2023.

We also focus our commitment to well-being through the creation of **Well-being Committees**, which are cross-disciplinary bodies that coordinate various initiatives related to diversity, equality, promoting health, inclusion, work-life balance, mental health, working hours, food, ergonomics, workspaces, sports, our people mobility and participation in social events and actions. During 2024, new Well-being Committees were established in markets such as France, Serbia, Switzerland and United States, bringing the total number of markets to 23. In 2025 we plan to set up these committees in additional markets.

MDR-A_01;
MDR-A_02;
MDR-A_03;
MDR-A_04;
MDR-A_05

/ Prevention initiatives

Related IROs: [S1.I4; S1.R1]

- **Initiatives for the prevention of musculoskeletal injuries**

In the prevention of musculoskeletal injuries, we continuously evaluate ergonomics in our workplaces, providing initial training on the subject to all employees and emphasising aspects such as ergonomically designed work spaces, appropriate load lifting techniques and the use of assistive equipment as well as safe working environments. In this regard, during 2024, work continued on improving spaces in distribution centres, implementing machinery that minimises physical effort, and 8,477 people were trained in work teams.

We also encourage task rotation, regular rest and active breaks and open communication on health and safety matters. For instance, the SmartPlanner technological solution has been implemented at our distribution centres, a system that plans the rotation of tasks in an automatic and agile manner, taking into account ergonomic criteria and internal equity, while meeting the operational needs of the centre.

Furthermore, in 2024 more than 7,983 workers took part in initiatives such as the Back School and Preventive and Recovery Plans, at both logistics centres and stores.

- **Implementation of Emergency and Evacuation Plans and Self-Protection Plans**

So as to **actively manage at all times the risks** that may arise in any workplace, and in keeping with our philosophy of following the precautionary principle, we have designed, prepared and implemented **Emergency and Evacuation Plans and Self-Protection Plans** that establish the organisational and functional criteria in the different facilities. The objective is to prevent, control and provide an adequate response, from the outset, to potential emergency situations that may cause harm to people and/or their property.

Through these Plans, we comply with the regulatory requirements applicable to occupational risk prevention and occupational health and safety, as well as with the internal requirements established by the Group for the workplaces. In 2024, 1,331 Emergency and Evacuation Plans were made.

ⓘ More information on other health and safety initiatives and metrics in section *S1-14. Health and safety metrics* of this Report.

General considerations on actions related to our people

MDR-A_06;
MDR-A_07

Actions related to our people are mainly carried out by our own workforce. The financial resources earmarked for these actions are associated with staff costs and other external operating expenses, which separately do not represent a material amount. Both are included in Operating Expenses in the Consolidated Income Statement (see *Note 6* of the Consolidated Annual Accounts).

Agreements and collaborations

We consolidate our commitment to diversity and inclusion by collaborating with various entities. These include Arborus, through the European and international label GEEIS (Gender Equality European and International Standard), and the European Network Against Racism (ENAR).

We also partner with the Business Network for LGBTI Diversity and Inclusion (REDI) in Spain, which aims to foster an inclusive and respectful environment in organisations, and Open for Business, an entity that brings together leading global companies that advocate for inclusion and LGBTQI+ rights to demonstrate that more inclusive societies are better for business and for companies because they are more innovative, productive and dynamic.

In the field of disability inclusion, Inditex is a member of the ILO Global Business and Disability Network, of which we have been part of the Steering Committee since January 2025, Moreover, we are members of Disability:In. These alliances, as well as those we have at the local level, are established with the objective of continuing to work on best practices to ensure real and sustainable inclusion over time.

ⓘ More information on actions related to diversity and inclusion in the report *Diversity and Inclusion*, published on the Inditex corporate website.

C. Metrics and targets

S1-5/S1-12. Persons with disabilities and related target

At Inditex, our goal is to help people with disabilities to overcome barriers, fostering an inclusive culture for everyone. With this in mind, the Group's disability inclusion strategy is based on three priority areas:

/ Employability, direct recruitment and professional development.

/ Disability awareness and training for our people.

/ Accessibility of workplaces, inclusive shopping experience and transversal projects.

One of our priorities is to comply with the principles of universal accessibility for persons with disabilities, whether in our workforce or customers. Our workplaces apply the functional and dimensional requirements that allow an independent use by people with disabilities or people with impaired mobility. Our commercial websites and apps incorporate functionalities adapted for people with various kinds of disability, as do our corporate sites, with a focus on technological advances in digital accessibility that allow us to continue improving in this regard.

Therefore, within the framework of our Shaping Today x Tomorrow initiative in 2024, a multidisciplinary working group was created with a focus on accessibility, involving people from different areas of the business (Commercial, Operations, Digital, Construction, Labelling, Design, People, etc.) to promote innovation linked to accessibility for all people, with targets set for the short-, medium- and long-term.

Employability and awareness are two pillars that we build together, as training and awareness are key to the success of the labour inclusion process. Our efforts in employability of people with disabilities are materialised in the following objective:

- **To double the number of people employed with disabilities**

S1.MDR-T_01-13

Our commitment to the inclusion of people with disabilities in the workplace is founded upon the basic principles of dignity and independence, availing them of the opportunities and resources to play an active and equal role in society.

MDR-T_01; S1-5_04

That is why we advocate for sustainable recruitment with a long-term strategy to attract and recruit people with disabilities, ensuring inclusive selection processes for people with different types of disabilities.

S1-5_06

This target is set in the framework of our membership of the ILO Global Business and Disability Network, that seeks to promote the inclusion of people with disabilities in the workplace.

MDR-T_02; MDR-T_05; MDR-T_06; MDR-T_07; MDR-T_08; MDR-T_13

Target: to double the number of people with disabilities in 2024

	Base year	Target value	Value reached
	2021	2024	2024
People employed	1,443	2,886	3,142

The actions carried out over the years have allowed us, not only to achieve the goal of doubling the number of people with disabilities we employed in 2021, but to exceed it.

S1-12_01; S1-12_02

Thus, at the end of 2024, we directly employed 3,142 people with disabilities (2,041 people with disabilities in 2023), representing 2% of the annual average workforce.

People with disabilities in our workforce

	2024	
	Number of employees	**%**
Women	1,923	61%
Men	1,207	38%
Non-binary	0	0%
Other/Unspecified	12	0.4%
Total	**3,142**	**100%**

MDR-T_11; S1-5_01; S1-5_02; S1-5_03

In order to establish the target, a prior diagnosis was made during 2022 of the employability status of people with disabilities in each market, as well as regarding the existence or lack of national or local legislation impacting on such employability. This diagnosis was made through the Diversity Champions in each market, who have since monitored the actions and follow-up of the targets at a local level. The Diversity and Inclusion team and the international People teams have been responsible for coordination with the Diversity Champions community across the different brands and markets.

Likewise, for the purpose of consolidating all the data, since 2022 all our direct employability projects for people with disabilities have been grouped under the umbrella of the **INCLUYE** programme, involving expert organisations in each market. In Spain, it is worth highlighting our work with Plena Inclusión, a confederation comprising more than 880 associated entities. At the international level, we develop our programmes under the global umbrella of the ILO Global Business and Disability Network and more than 70 national and international organisations. These expert organisations provide support services and programmes for the occupational integration of people with intellectual disabilities, as well as awareness and training initiatives to promote more inclusive work environments. Their feedback is therefore essential to improve our processes and the integration of people with different types of disabilities, enabling us to improve and learn from experience.

We also establish **specific plans at our subsidiaries**, to help them achieve their recruitment targets and improve their inclusion of people with disabilities through training and awareness. This is the case in Germany, where we collaborate closely with the Federal Employment Agency; in France, with the Accord Handicap company agreement on disability; in Italy, which has implemented the ALL IN project for the occupational integration of people with intellectual disabilities in Milan and Verona; in Portugal, with its Eu Incluo project; in Japan, which holds regular meetings with partner associations and staff with disabilities; or in Romania, which provides internal training to its teams and recruitment with the support of several NGOs and the Department for Social Assistance.

ⓘ More information on the initiatives carried out in section *S1-4. Actions related to own workforce* of this Report.

Further considerations

S1-12_03

It is important to note that the data linked to this target is particularly sensitive. In fact, there are countries where it is not permitted to ask or record information on disability status in company systems, as well as others where there are regulatory limitations in this regard.

The collection of disability information has certain limitations, such as those linked to confidentiality and/or the heterogeneous legislation in the markets where we operate, which do not always have regulations comparable to those in Spain. In addition, some countries have specific regulations that affect the accessibility of such information. Specifically, some of the difficulties we encounter when collecting this information, which in some cases mean we have no measured data available, are as follows:

/ Countries with legal restrictions on requesting information and/or registering information with regard to a person's disability.

/ Countries with discrepancies between the Company's calculation method (number of people with disabilities on 31/01 divided by the average number of people hired in the last 12 months) and the legal calculation methodology in the country for the number of people with disabilities.

/ Countries where people with disabilities are not allowed to be hired directly during the first year, even if they are employed within our workforce, and must be recruited by an expert entity during the first year.

As a result of these limitations, the actual number of people with disabilities in the Company may differ from the figure reported in some markets where certain idiosyncrasies have been taken into account in the calculation, such as: United Kingdom, Ireland, Nordic countries (Sweden, Norway, Finland, Denmark), Switzerland, Spain, United States, Canada, Australia and New Zealand.

MDR-T_03; MDR-T_04; MDR-T_09; MDR-T_12

ⓘ More information on the scope, methodology and calculation changes in the *Methodological Annex* of this Report.

S1-6. Characteristics of the employees

S1-6_01; S1-6_02

It is a priority for Inditex to create **motivating, stable and safe** working environments, with equal opportunities and development, ensuring the utmost care for the conditions of our people. We strive to adapt our responses to the local needs in the 56 markets in which our employees are present, and to guarantee quality workplaces.

S1-6_13; S1-6_14; S1-6_15; S1-6_16

The employee figures below are calculated on the basis of the average number of our workforce for the last quarter of the 2024 calendar year, which is the most representative calculation for our business.

ⓘ More information on how we calculated employee figures in the *Methodological Annex* of this Report.

S1-6_17

Note 6 to the Consolidated Annual Accounts includes information related to the number of employees, and the breakdowns by gender and category, as well as associated expenses.

ⓘ More information in *Note 6 - Operating expenses* to the Consolidated Annual Accounts.

Our people in 2024

162,083 people

170 nationalities

Distribution by activity

	2024		2023	
	Number of employees	%	Number of employees	%
Store	139,478	85%	138,977	86%
Central services	12,030	7%	11,612	7%
Logistics	9,981	6%	10,090	6%
Factories	594	1%	602	1%
Total	**162,083**	**100%**	**161,281**	**100%**

Distribution by geography

	2024		2023	
	Number of employees	%	Number of employees	%
Americas	18,743	12%	19,963	12%
Asia and rest of the world	14,139	9%	15,526	10%
Spain	49,915	31%	47,761	30%
Europe (ex-Spain)	79,286	49%	78,031	48%
Total	**162,083**	**100%**	**161,281**	**100%**

Distribution by age

	2024		2023	
	Number of employees	%	Number of employees	%
Under 30 years old	89,044	55%	89,690	56%
30 to 50 years old	66,560	41%	66,155	41%
Over 50 years old	6,479	4%	5,436	3%
Total	**162,083**	**100%**	**161,281**	**100%**

Distribution by gender

	2024		2023	
	Number of employees	%	Number of employees	%
Women	118,698	73%	118,925	74%
Men	42,554	26%	42,309	26%
Non-binary	28	0.02%	25	0.02%
Others/Unspecified	803	0.50%	22	0.01%
Total	**162,083**	**100%**	**161,281**	**100%**

S1-6_04;
S1-6_05

A breakdown of the workforce by market for all countries in which the Company has employees is included below:

Distribution by market

Country	Number of employees	
Europe (ex-Spain)	**2024**	**2023**
Albania	308	310
Germany	4,967	5,046
Austria	1,503	1,409
Belgium	3,112	2,955
Belarus	356	352
Bosnia-Herzegovina	401	427
Bulgaria	827	781
Croatia	1,241	1,184
Denmark	298	295
Slovakia	528	467
Slovenia	250	228
Finland	170	174
France	11,513	10,975
Greece	4,228	4,065
Hungary	1,224	1,109
Ireland	991	1,016
Italy	10,877	10,283
Luxembourg	325	304
North Macedonia	310	325
Monaco	38	40
Montenegro	178	165
Norway	315	343
Netherlands	2,715	3,089
Poland	4,233	4,594
Portugal	7,261	6,964
United Kingdom	6,483	6,739
Czech Republic	729	674
Romania	2,850	2,899
Serbia	1,512	1,422
Sweden	659	695
Switzerland	1,427	1,398
Türkiye	6,267	6,496
Ukraine	1,190	809
Total	**79,286**	**78,031**

Distribution by market

Country	Number of employees	
Asia and rest of the world	**2024**	**2023**
Australia	1,879	2,076
Bangladesh	81	76
Cambodia	6	4
South Korea	1,663	1,639
India	1,731	1,691
Japan	2,682	2,837
Kazakhstan	1,311	1,272
Morocco	44	42
New Zealand	121	138
Pakistan	12	11
Singapore	3	3
South Africa	502	556
Vietnam	21	18
Mainland China	3,036	3,887
Taiwan, China	486	531
Hong Kong SAR	521	702
Macao SAR	39	43
Total	**14,139**	**15,526**
Spain	**2024**	**2023**
Spain	49,915	47,761
Americas	**2024**	**2023**
Brazil	3,226	3,162
Canada	2,052	2,653
Chile	929	992
United States	5,952	6,170
Mexico	6,584	6,986
Total	**18,743**	**19,963**

Distribution of the workforce by type of contract and type of working hours

In 2024, 83% of our workforce is on a permanent contract (compared with 81% in 2023). In terms of working hours, 57% of Inditex's employees work part-time and 41% work full time in 2024 (57% part-time and 42% full-time in 2023).

This breakdown by type of working hours is typical of the retail *sector*, where there are especially busy periods during sales that require part-time reinforcements. We also often hire people who combine their work at Inditex with other activities, such as academic development.

S1-6_09

The Full-Time Equivalent (FTE) workforce, a meaningful indicator when it comes to analysing employment quality, shows the workforce after consolidating all working hours to full-time. In 2024, it represented 78% of total jobs (78% in 2023).

The tables below show the different types of contract and working hours for our people by gender and region:

S1-6_07;
S1-6_08;
S1-6_18;
S1-6_19;
S1-6_20

Breakdown by gender and type of contract/working hours

2024					2023				
Women	**Men**	**Non-binary**	**Other/ Unspecified**	**Total**	**Women**	**Men**	**Non-binary**	**Other/ Unspecified**	**Total**
Number of employees									
118,698	42,554	28	803	**162,083**	118,925	42,309	25	22	**161,281**
Number of permanent employees									
97,775	35,483	28	697	**133,983**	96,263	34,910	25	22	**131,221**
Number of temporary employees									
20,923	7,071	1	106	**28,100**	22,662	7,398	0	0	**30,060**
Number of non-guaranteed-hour employees									
1,337	549	0	0	**1,886**	1,744	635	0	0	**2,378**
Number of full-time employees									
45,848	21,239	10	98	**67,195**	46,305	21,169	11	6	**67,491**
Number of part-time employees									
71,513	20,767	18	705	**93,003**	70,876	20,505	14	16	**91,411**

Breakdown by region and type of contract/working hours

2024					2023				
Europe (ex-Spain)	**Spain**	**Asia and rest of the world**	**Americas**	**Total**	**Europe (ex-Spain)**	**Spain**	**Asia and rest of the world**	**Americas**	**Total**
Number of employees									
79,286	49,915	14,139	18,743	**162,083**	78,031	47,761	15,526	19,963	**161,281**
Number of permanent employees									
64,509	43,256	8,598	17,620	**133,983**	61,350	41,712	9,624	18,535	**131,221**
Number of temporary employees									
14,777	6,659	5,541	1,123	**28,100**	16,681	6,049	5,902	1,428	**30,060**
Number of non-guaranteed-hour employees									
0	0	1,886	0	**1,886**	0	0	2,378	0	**2,378**
Number of full-time employees									
28,242	25,230	7,408	6,314	**67,195**	27,798	24,838	8,146	6,710	**67,492**
Number of part-time employees									
51,044	24,685	4,845	12,428	**93,003**	50,233	22,923	5,002	13,253	**91,411**

Breakdown by age and type of contract/working hours

2024				2023			
Under 30 years old	30 to 50 years old	Over 50 years old	Total	Under 30 years old	30 to 50 years old	Over 50 years old	Total
Number of employees							
89,044	66,560	6,479	**162,083**	89,690	66,155	5,436	**161,281**
Number of permanent employees							
65,635	62,076	6,271	**13,983**	64,916	61,106	5,198	**131,221**
Number of temporary employees							
23,407	4,484	208	**28,100**	24,774	5,049	238	**30,060**
Number of non-guaranteed-hour employees							
1,579	297	10	**1,886**	2,059	307	12	**2,378**
Number of full-time employees							
23,108	39,432	4,655	**67,195**	23,744	39,743	4,004	**67,491**
Number of part-time employees							
64,357	26,831	1,815	**93,003**	63,887	26,105	1,419	**91,411**

Breakdown by job classification and type of contract/working hours

2024				2023			
Management	Supervisor	Specialist	Total	Management	Supervisor	Specialist	Total
Number of employees							
9,667	15,056	137,361	**162,083**	9,811	14,976	136,494	**161,281**
Number of permanent employees							
9,425	14,689	109,868	**133,983**	9,548	14,530	107,143	**131,221**
Number of temporary employees							
241	366	27,493	**28,100**	263	446	29,352	**30,060**
Number of non-guaranteed-hour employees							
0	0	1,886	**1,886**	0	0	2,378	**2,378**
Number of full-time employees							
9,312	13,553	44,329	**67,195**	9,410	13,431	44,651	**67,491**
Number of part-time employees							
354	1,503	91,146	**93,003**	401	1,544	89,466	**91,411**

Leaves and turnover rate

S1-6_11; S1-6_12

In 2024, 138,152 leaves were recorded (144,930 leaves in 2023), which represents a turnover ratio of 88% in 2024 (93% in 2023). The Group's voluntary turnover rate was 36% (43% in 2023), while non-voluntary turnover rate was 52% (50% in 2023). Turnover is influenced by the nature of the retail sector, with a marked seasonality. The existence of peaks in activity that require reinforcement of teams with temporary contracts especially impacts non-voluntary rotation, since it includes leaves due to the end of the contract of this collective.

S1-9. Diversity metrics

Of our achievements in diversity and inclusion best practices, we highlight the **GEEIS (Gender Equality European and International Standard)** certification at several of our subsidiaries. The GEEIS recognises those companies and workplaces that are actively engaged in building a fairer society, based on equality between men and women and on diversity and inclusion as the pivotal values of their policies. Between 2018 and 2024, the global corporate Group and nine of our subsidiaries worldwide (Belgium, France, Italy, the Nordic hub, Germany, Ukraine, Bulgaria, Romania and the United States) were awarded this certification. This is enabling us to consistently and continuously deploy our gender equality policies in the various markets.

S1-9_01;
S1-9_02

Distribution by gender

Ensuring equal treatment and opportunities at the workplace has always been a part of our core at Inditex. We nurture diverse and inclusive workplaces in which women, who represent 73% of our workforce, feel empowered in their professional development and free of any discriminatory practices. By empowering women and men alike, our aim is to strengthen our growth and the success of the Company and society as a whole.

Cultivating **women's talent** has enabled us to keep mantaining a solid commitment in regard to their leadership within the Group: in 2024, **77% of the Company's management positions were filled by women** (78% in 2023).

The distribution of our people by gender and job classification in 2024 is thus as follows:

Distribution by gender and job classification

2024									
	Women		**Men**		**Non-binary**		**Other / Unspecified**		**Total**
Management	7,457	77%	2,210	23%	0	0%	0	0%	9,667
Supervisor	10,435	69%	4,617	31%	2	0.01%	1	0.01%	15,056
Specialist	100,806	73%	35,727	26%	26	0.02%	802	0.58%	137,361
Total	**118,698**	**73%**	**42,554**	**26%**	**28**	**0.02%**	**803**	**0.50%**	**162,083**

2023									
	Women		**Men**		**Non-binary**		**Other / Unspecified**		**Total**
Management	7,691	78%	2,120	22%	0	0%	0	0%	9,811
Supervisor	10,381	69%	4,593	31%	2	0.01%	0	0%	14,976
Specialist	100,853	74%	35,596	26%	23	0.02%	22	0.02%	136,494
Total	**118,925**	**74%**	**42,309**	**26%**	**25**	**0.02%**	**22**	**0.01%**	**161,281**

S1-9_02;
S1-9_06

The Company has a total of seven women in its Senior Management[33], which represents a **33.33%** out of the total members. Thus, the percentage of female representation in Senior Management increases with respect to 2023 fiscal year (31.82%).

ⓘ More information on Senior Management in the *Annual Corporate Governance Report* of this Report.

S1-9_03;
S1-9_04;
S1-9_05

Distribution by age

In terms of age, our workforce is made up of people from different generations, the youngest groups being the largest, as evidenced by the average age of our workforce, which is **30.9** yearls old (30.6 years old in 2023). The following table shows the generational distribution of our people in greater detail.

Distribution by age

	2024		**2023**	
	Number of employees	**%**	**Number of employees**	**%**
Under 30 years old	89,044	55%	89,690	56%
30 to 50 years old	66,560	41%	66,155	41%
Over 50 years old	6,479	4%	5,436	3%
Total	**162,083**	**100%**	**161,281**	**100%**

ⓘ More information on the breakdown by gender and age in *S1-6. Characteristics of the employees* of this Report.

[33] As per the definition established for these purposes in Circular 3/2021, of 28 September, of Spain's National Securities Market Commission (CNMV), which approves the new model corporate governance and director remuneration reports, 'Senior Management' means those executives who report directly to the Board or to the Chief Executive Officer of the Company and, in any event, the internal auditor.

S1-8. Collective bargaining coverage and social dialogue

S1-8_01

Globally, the percentage of our workforce covered by local collective bargaining agreements is 61% (59% in 2023), while within the European Economic Area (EEA) the figure is 84% (82% in 2023). Just like in the previous year, in Spain, 100% of the workforce is covered by collective bargaining agreements.

S1-8_02; S1-8_03; S1-8_06; S1-8_08

For our workforce in EEA countries, we have various collective bargaining agreements, depending on the country in which the employees are located. The percentages of collective bargaining coverage and workplace representation for our workforce are included below.

	Collective Bargaining Coverage		Social dialogue
Coverage rate	**Employees (EEA)**	**Employees (Non-EEA)**	**Workplace representation (EEA)**
0-19 %	Bulgaria; Slovakia; Greece; Hungary; Ireland; Poland; Czech Republic; Romania	Rest of Europe; Asia and Rest of World	Bulgaria; Croatia; Slovenia; Greece; Ireland; Netherlands; Czech Republic; Romania
20-39 %	Denmark	Americas	Denmark
40-59 %			Germany; Hungary; Italy
60-79 %	Germany		
80-100 %	Austria; Belgium; Croatia; Slovenia; Spain; Finland; France; Italy; Luxembourg; Norway; the Netherlands; Portugal; Sweden		Austria; Belgium; Finland; France; Luxembourg; Norway; Poland; Portugal; Slovakia; Spain; Sweden

S1-8_04

We work to guarantee the right of participation of our workforce worldwide. That is why our people have minimum guarantees in their working conditions, regardless of whether or not they are covered by collective bargaining agreements.

Proof of this are the commitments reflected in the Code of Conduct and the renewal in October 2024 of our **Global Agreement** signed in 2009 for implementation of fundamental labour rights and decent work, with UNI Global Union.

ⓘ More information on the Global Agreement with UNI Global Union in *S1-2. Processes for engaging with own workforce* of this Report.

S1-8_05

Furthermore, our Human Rights Policy reflects the respect for freedom of association and collective bargaining not only of our own employees but of other professionals linked to Inditex. To achieve this, we require companies linked to non-employees to respect the rights of association, affiliation and collective bargaining of their workers, without retaliation, and without offering payments or remuneration to workers with the aim of hindering the exercise of these rights. We also take an open and collaborative approach with trade unions and workers' representatives. In this way, we contribute to favourable working conditions for non-employees, always in line with their right to collective bargaining.

S1-8_07

As explained above, in 2019, Inditex formally founded the Company's EWC, a key body for assurance and effectiveness of information and consultation of workers. In 2024, Inditex and the EWC published a joint statement against gender-based violence, which was disseminated internally and externally on 25 November, the International Day for the Elimination of Violence against Women.

ⓘ More information in section *S1-2. Processes for engaging with own workforce* of this Report.

S1-15. Work-life balance metrics

At the Inditex Group we promote work-life balance, advocating especially for **co-responsibility**, which we consider to be both a right and a duty. We work to implement work-life balance measures in all the markets.

In Spain, these measures are enshrined in our **Equality Plans**. These plans include, among other things, the possibility of splitting up leave periods for hospital stays or care of relatives up to second degree of kinship, flexible working hours for adaptation periods at nursery or infant schools, or the extension of leave with job guarantee for personal matters, studies, international adoption or care of dependent family members, in addition to various improvements with respect to ordinary legal requirements, such as the extension of breastfeeding leave.

Internationally, we strive to improve the rights guaranteed by the local legislation of each country, prioritising those markets in which the legislation is not especially protective.

/ In the **United States**, 16 weeks' paid leave for birth, fostering or adoption is available to all of our people who meet certain minimum requirements. The subsidiary also provides care services for children and adults with special needs, both in care centres and at home. We also have other benefits that help improve people's well-being and quality of life such as emotional support programmes, financial and health advice, transport subsidies, and tuition fee subsidies or reimbursement.

/ We promote measures to broaden the rights enshrined in local legislation, such as flexible working hours, efficient organisation of teams, extending leave for caring for children and/or dependants and even financial assistance to help cover the cost of childcare or other care. Markets where such measures are applied include **Greece, the United States, the United Kingdom, Italy, Germany, and France, among others.**

/ An increasing number of markets are extending family health coverage, either as a social benefit paid for by the subsidiary itself or by negotiating more favourable health insurance conditions. In addition to Spain, through its flexible remuneration plan, markets such as **Brazil** (with its Baby on Board programme), **Canada, Mexico, Greece, Romania and Mainland China** already offer this type of benefit.

The Inditex Group also promotes the **right to** digital **disconnection in the workplace**, pursuant to Spain's Data Protection Act (Organic Law 3/2018, of 5 December, on the Protection of Personal Data and Guarantee of Digital Rights). Notwithstanding the commitment acquired at the corporate level, negotiations with workers' representatives have resulted in other measures on this front, included both in the equality plans of the logistics companies, and in the Group's new Equality Plan, applicable in Spain.

Internationally, France has included the right to disconnect as a measure to improve work-life balance. In turn, in 2024, markets such as Australia and Slovenia introduced digital disconnection laws.

In other markets where there is no specific legislation in this regard, we implement information and awareness initiatives, along with technical measures applied to our corporate systems, such as e-mail, to encourage these healthy work habits.

S1-15_01; S1-15_02; S1-15_03

Inditex advocates for all our people to have the social protections regulated in the local legislation of each market. In 2024, 99% of our worldwide workforce was entitled to maternity, paternity or child fostering leave (99% of women and 99% of men). In this period, 6% of those people took such leave (7% of women and 3% of men).

Below is a breakdown of maternity and paternity leave worldwide:

	2024		2023	
Parental leave	**Number of employees**	**%**	**Number of employees**	**%**
Total	**9,322**	**100%**	**9,581**	**100%**
Women	8,252	89%	8,570	89%
Men	1,070	11%	1,011	11%

S1-13. Training and skills development metrics

We want working at Inditex to be more than just a job for our people, and we make it easier for them not only to secure professional goals and opportunities, but also to find inspiration, innovation and creativity. To achieve this, from the talent management standpoint we focus on:

/ **Attracting the best talent.**

/ Providing our people with **opportunities for professional development and growth**, primarily through internal promotion and mobility.

/ Providing our workforce with opportunities for **continuous learning.**

/ Creating a safe and motivating working environment that enable us to **retain talented professionals and strengthen their commitment.**

S1-13_04

Thus, from 1 February 2024 to 31 January 2025, more than 3.3 million training hours were imparted to more than 2.5 million participants (more than 2.7 million hours and more than 2.2 million participants in 2023)[34].

Accordingly, in 2024 the number of unique people trained[35] was 214,952 (214,187 in 2023), broken down by gender as 155,964 women, 55,418 men, 40 non-binary and 3,530 persons of other/unspecified gender (158,324; 55,183; 46 and 634 in 2023).

This training is part of our drive to develop our workforce and our ongoing work to nurture environments that encourage lifelong learning.

Our aim is to provide training experiences that help our people to respond optimally to the challenges they face daily. We are convinced that not only do these experiences build the wealth of skills of our workforce, but they are also a key pillar for the Company's sustainable success.

To this end, we offer learning experiences that respond to two needs: on the one hand, the business, offering initiatives aimed at improving individual or group performance and helping our staff to do their job better; and, on the other hand, promoting opportunities for our people to learn beyond their current role, to be inspired and encouraged to explore new perspectives.

Our model is based on in-house training and is eminently practical. Training is mostly delivered by in-house trainers or developed in collaboration with top external entities when the required knowledge or experience is not available in-house.

In addition, as mentioned above, our learning platform Tra!n offers a wide range of digital content tailored to each individual.

ⓘ More information on talent, promotion and training in *S1-1. Policies related to own workforce* and *S1-4. Actions related to own workforce* of this Report.

Details of the training indicators are as follows:

Distribution by job classification

S1-13_01;
S1-13_03

	2024			2023		
	Training hours	**Participants**	**Hours per person**	**Training hours**	**Participants**	**Hours per person**
Management	231,490	174,359	23.9	270,884	208,045	27.6
Supervisor	313,953	203,122	20.9	291,368	222,865	19.4
Specialist	2,747,344	2,165,970	20.0	2,220,578	1,834,077	16.2
Total	**3,292,787**	**2,543,451**	**20.3**	**2,782,830**	**2,264,987**	**17.2**

Distribution by gender

	2024			2023		
	Training hours	**Participants**	**Hours per person**	**Training hours**	**Participants**	**Hours per person**
Women	2,338,801	1,877,398	19.7	2,045,403	1,696,018	17.1
Men	914,974	626,523	21.5	735,802	566,206	17.4
Non-binary	699	541	24.7	776	637	30.9
Other/Unspecified	38,314	38,989	47.7	849	2,126	38.3
Total	**3,292,787**	**2,543,451**	**20.3**	**2,782,830**	**2,264,987**	**17.2**

[34] The year-on-year variation is partially linked to the implementation of the global training campaign on the update of the Code of Conduct carried out in 2024. More information in section *G1-3. Prevention and detection of corruption and bribery*.
[35] A person can attend more than one training course. In the indicator 'unique people trained', those people who have attended more than one course are counted only once.

Distribution by geographic area

	2024			2023		
	Training hours	Participants	Hours per person	Training hours	Participants	Hours per person
Spain	730,780	576,250	14.6	456,833	488,312	9.6
Europe (ex-Spain)	1,675,659	1,381,533	20.8	1,419,197	1,143,593	18.2
Americas	379,609	318,185	20.3	507,350	380,695	24.8
Asia & Rest of the world	506,739	267,483	39.5	399,450	252,387	25.7
Total	**3,292,787**	**2,543,451**	**20.3**	**2,782,830**	**2,264,987**	**17.2**

Distribution by content

	2024		2023	
	Training hours	Participants	Training hours	Participants
Corporate (About us)	2,311,959	1,414,532	1,360,243	1,009,867
Customers	52,103	154,838	87,305	123,719
Fashion and Product	141,649	365,461	153,927	428,895
Languages	37,900	20,603	26,487	23,640
Processes, Techniques and Tools	604,135	489,495	920,811	550,640
Skills	145,041	98,522	234,057	128,226
Total	**3,292,787**	**2,543,451**	**2,782,830**	**2,264,987**

S1-14. Health and safety metrics

S1-14_01

In connection with health and safety protection, since 2014 we have been implementing the **ISO 45001:2018 management system**, internationally recognised for its ability to control risks and improve occupational health and safety performance.

In 2024, this system, considered to be the highest standard in health and safety, is being implemented in a total of 29 markets and 336 workplaces, covering 86% of our own workforce. In 2024 we also obtained that certification in the markets of Kazakhstan, Australia and France, and we maintained certification of our refurbishment and construction works in Europe, carried out by GOA INVEST, S.A.

In health and safety, the main indicators on accident rates at our own logistics, store, office and manufacturing activities are shown below.

Accident rates of our workforce

S1-14_04;
S1-14_05

	Number of recordable accidents		Frequency rate		Severity rate	
	2024	2023	2024	2023	2024	2023
Women	43	13	0.29	0.09	0.01	0.00
Men	12	3	0.20	0.05	0.01	0.00
Total	**55**	**16**	**0.27**	**0.08**	**0.01**	**0.00**

Work-related health events

S1-14_06

	Occupational diseases		Other health events		Total	
	2024	2023	2024	2023	2024	2023
Women	14	16	268	253	282	269
Men	7	7	259	221	266	228
Total	**21**	**23**	**527**	**476**	**548**	**499**

S1-14_02;
S1-14_03

In 2024 and 2023, there were no fatalities resulting from recordable accidents or work-related health events in our workforce, or of other collaborators carrying out tasks in our own facilities, in any of our markets.

S1-14_07

The number of days lost due to recordable work-related accidents, health events or deaths was 16,695 days in 2024 (17,605 in 2023).

Non-employee accidents

At Inditex, we also look after the health and safety of people who are not part of our staff but who work at the Group's workplaces under its supervision. That is why we monitor the occupational accidents of non-employees.

In 2024, seven recordable accidents and health events of unpaid staff were recorded.

S1-10/S1-16. Compensation metrics

Adequate wages

S1-10_01

All of our workforce receive adequate wages, according to the analysis based on applicable agreements, legal benchmarks or recognised methodological sources, such as the Anker methodology.

ⓘ More information in the *Methodological Annex* of this Report.

Average remuneration and gender pay gap

At Inditex we are committed to **equal pay for women and men**. This commitment rests on a remuneration policy established in accordance with the value that each person contributes from their professional experience, dedication and responsibility, with no discrimination on the grounds of gender, age, culture, religion, race or any other characteristic.

Under the framework of the Equality Plan, and taking into account the workforce in Spain, in 2024 the remuneration audit was renewed in the presence of workers' representatives. The methodology and calculation of this audit was reviewed at the time of signing the agreement, through external suppliers. We obtained a verification based on the International Standard on Assurance Engagements (ISAE) 3000 Revised. This verification guarantees the integrity of the Remuneration Register and Wage Audit carried out by the Company, the findings of which establish that there is no gender-based pay discrimination in work of equal value.

S1-16_03

Inditex remunerates its team in accordance with the Group's values, guaranteeing non-discrimination for reasons of gender, age, culture, religion, race or any other circumstance. Our remuneration policy is therefore determined by the value that each person contributes through their professional experience, dedication and responsibility.

As a Group with a strong international presence, we strive to ensure that our remuneration policy is adapted to the specific circumstances of each of the 56 markets in which our teams are located, aligning the standard remuneration with the benchmark practices in each of these markets in their local currency.

Inditex's remuneration **comprises a fixed component and a variable component.**

/ Experience, dedication and responsibility within the Company are the factors that determine fixed remuneration.

/ The variable part depends on pre-established, quantifiable and measurable indicators, linked both to the Company's results and to the fulfilment of the sustainability objectives of the office employees, thus reinforcing the commitment of our people in this area.

Based on this criterion, variable remuneration depends solely on objective parameters, and not on a discretionary assessment of the person's individual performance. This aims to eliminate any room for discrimination. In this regard, **variable remuneration is one of the key components of Inditex's remuneration policy and applies to employees in all areas of the Company's activity.**

In our stores, the most widely used variable remuneration system is that of the monthly sales commission scheme. This is a way to reward the engagement of store employees in key issues as sales results, feedback on products and store coordination and organisation.

Global average remuneration

Average remuneration is defined as the average wages in the Group —considering the total salary: fixed plus variable, consisting of commission and bonus— translated into euros, using the average exchange rate in 2024. Based on this calculation, global average remuneration in this period at Inditex amounted to 30,850 euros gross annually (28,726 euros in 2023).

With regard to this figure, it should be highlighted that the number of employees in Spain, our home market, only represents 31% of the headcount, as a significant part of the remaining 69% staff are based in markets where wages translated into euros give rise to lower average remuneration (30% and 70% of workforce in 2023).

By gender, the average remuneration of women in 2024 amounted to an annual gross figure of 29,694 euros, and that of men came to 33,932 euros (women: 27,831 euros in 2023; men: 31,196 euros in 2023).

These two figures are not representative in terms of equal pay: the pay gap between men and women is due to a higher presence of women in a significant number of markets where average remuneration is lower on account of the exchange rate effect. As explained above, the indicator that provides the most transparency in terms of equal pay for men and women is the pay gap, which in 2024 was 0.7% in favour of women.

Based on these premises, the average remuneration by age and by job classification is provided below:

Aggregate remuneration in €	**2024**	**2023**
Job classification		
Management	85,586	70,567
Supervisor	47,467	43,336
Specialist	26,434	25,132
Age		
Under 30 years old	22,740	21,631
30 to 50 years old	39,141	36,460
Over 50 years old	66,132	58,535

S1-16_02

The ratio between the total annual remuneration of the highest paid individual and the median remuneration of all employees is 196.

ⓘ More information on the methodology for calculating the annual total compensation ratio in the *Methodological Annex* of this Report.

S1-16_01

Gender pay gap

Inditex is committed to equal pay. For quantification purposes, we use the gender pay gap, which is the indicator that most reliably represents the real difference in pay between women and men.

S1-16_03

The gap is calculated on the basis of the median salary in each market considering the total salary: fixed plus variable, consisting of commission and bonus.

ⓘ More information on the calculation methodology in the *Methodological Annex* of this Report.

The outcome of the analysis carried out in 2024 **shows wage parity between men and women in Inditex.** In total salary, women have been paid 0.7% more than men. The global gender pay gap has varied slightly with respect to previous years —in 2023, women were paid 0.5% more than men— which is explained by staff turnover in the period.

The pay gap by geographic area is detailed below:

S1-16_04

Gender pay gap	**2024**	**2023**	**2022**
Spain	1.1%	0.3%	-1.1%
Europe excluding Spain	0.9%	0.5%	1.1%
Americas	0.4%	0.7%	0.5%
Asia and rest of the world	-1.3%	0.8%	1.6%
Total	**0.7%**	**0.5%**	**0.4%**

If we break down the gap by job classification, in 2024 it was 1% for specialists (1% in 2023 and 1% in 2022), -3% for supervisor positions (-4% in 2023 and -3% in 2022) and -6% for management positions (-5% in 2023 and -8% in 2022), representing 85%, 9% and 6% of our people in 2024.

S1-17. Incidents, complaints and severe human rights impacts

S1-17_01; S1-17_02; S1-17_03; S1-17_07; S1-17_08; S1-17_09; S1-17_10

Our **Ethics Line** is in place for reporting any type of infringement or irregularity concerning human rights linked to our people, including potential inherently severe violations such as child labour or forced labour, in accordance with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and/or the OECD Guidelines for Business. Through this grievance mechanism we monitor all possible cases, handling the appropriate cases and adopting the corresponding decisions.

In 2024, the Ethics Line (which includes both the Global Ethics Line and the various Local Ethics Lines) recorded a total of 791 cases, of which 280 were related to our people. Of the total number of cases reported in 2024, four cases of discrimination have been confirmed. However, no inherently severe human rights-related incidents have been confirmed for our employees.

S1-17_04

As far as the National Contact Points for OECD Multinational Enterprises are concerned, no reports have been received, neither related to our people, nor of any other kind.

S1-17_05; S1-17_06; S1-17_11; S1-17_12

This year, no fines, penalties or damages were imposed for discrimination or human rights infringements materialising in 2024 in connection with our people.

ⓘ More information on the Ethics Line in section *G1-1. Corporate culture and business conduct* and on the reported indicators in section *G1-4. Communications received through the Ethics Line* and in the *Methodological Annex* of this Report.

S2. Workers in the value chain

A. Strategy

SBM-3. Material impacts, risks and opportunities

Combining dialogue and commitment to our stakeholders and the analysis of our value chain allows us to identify the material impacts, risks and opportunities (IROs) linked to the people who work in it.

As a result of this analysis, we identified that our IROs focus mainly on the **supply chain**.

Material Impacts, Risks and Opportunities related to value chain workers

		TYPE (I/R/O	PHASE OF THE VALUE CHAIN	RELATED POLICIES
S2.I1	**Working conditions**	I	/ Supply Chain	**Transversal policies:** / Code of Conduct / Code of Conduct for Manufacturers and Suppliers / Human Rights Policy / Sustainability Policy / Sustainability Stakeholder Relations Policy
S2.I2	**Achievement of adequate wages**	I	/ Supply Chain	
S2.I3	**Social dialogue and respect for the rights of freedom of association and collective bargaining**	I	/ Raw materials / Supply Chain	
S2.I4	**Work-related accidents and occupational diseases**	I	/ Raw materials / Supply Chain	
S2.I5	**Possible impacts on vulnerable groups**	I	/ Raw materials / Supply Chain	
S2.R1	**Risks related to value chain workers**	R	/ Supply Chain	

ⓘ More information on stakeholder engagement and our materiality analysis can be found in section *SBM-3. Material impacts, risks and opportunities* and *IROs. Disclosures on the materiality assessment process* of this Report.

Scope

S2.SBM-3_01; S2.SBM-3_02; S2.SBM-3_03; S2.SBM-3_08

We have assessed the possible impacts of our operations on supply chain workers, so as to take into account everyone who might be impacted, whether positively or negatively.

The findings of this assessment highlight that the IROs in connection with value chain workers focus primarily on our supply chain.

Furthermore, **our due diligence** in connection with human rights allows us to identify the groups in our supply chain that might be most affected, such as women, migrants and people with disabilities, or those who work in the production of raw materials. Our Workers at the Centre strategy focuses on these vulnerable groups, making their needs visible and including them in our actions to guarantee their protection.

ⓘ More information on the due diligence process in section *GOV-4. Statement on due diligence* of this Report.

Occurrence and types of impacts

S2.SBM-3_05; S2.SBM-3_06

Among the negative impacts related to supply chain workers, we have found various patterns of occurrence, linked, for example, to the realities of each region. That is why we believe it is crucial to understand the context of each one. This is a task in which we are supported by our supplier clusters, through which we are able to learn about the realities of those working in our supply chain on the ground. In these clusters we have local teams in direct contact with suppliers, workers, trade unions, NGOs, local and national authorities, international organisations and academic institutions, etc. In 2024, Inditex had 10 clusters in Spain, Portugal, Morocco, Türkiye, India, Bangladesh, Pakistan, Vietnam, China and Cambodia.

This work enables us to identify individual impacts, such as those linked to occupational accidents and serious occupational diseases or workplace harassment; as well as potential systemic impacts, linked to the existence of global and industry-wide characteristics.

This might be the case, for example, of inadequate work environments or situations of child or forced labour, the risk of which may increase in certain regions due to specific contextual factors. However, at Inditex we take a systemic approach to minimising the probability that this type of impact may occur. We therefore have mechanisms in place to prevent both systemic and individual impacts, implementing mitigation and remediation strategies to address the negative effects once they have occurred.

In this regard, our approach is based on the Code of Conduct for Manufacturers and Suppliers and its compliance programme, as well as our Workers at the Centre strategy and its five **Priority Impact Areas (PIA)**: Social dialogue, Living wages, Health, Respect and Resilience. Through these, we also endeavour to generate a positive impact, designing initiatives that allow us to enhance employee quality of life and well-being.

In this context, we underscore our **Global Framework Agreement with IndustriALL Global Union**, which promotes the participation of workers and respect for collective bargaining, and also provides key information for our strategy.

In addition, we have devised specific **Remediation Plans** to protect minors and refugees.

ⓘ More information on related actions in section *S2-4. Actions related to value chain workers* of this Report.

S2.SBM-3_04

As reflected in our Code of Conduct for Manufacturers and Suppliers and in our Human Rights Policy, we have **zero tolerance towards child labour and any form of forced or involuntary labour** and we are committed to eliminating them.

To ensure compliance with it, we conduct regular audits of our supply chain facilities.

ⓘ More information in section *G1-2. Management of relationships with suppliers* of this Report.

We also work actively to identify the stages of the supply chain that are most susceptible to **human rights violations**, so as to prevent them. In this regard, we identify greater vulnerability in areas associated with the cultivation of raw materials such as cotton. To achieve this, we work hand in hand with the ILO, within the framework of our Public-Private Partnership, for the promotion and respect of the Fundamental Principles and Rights at Work (FPRW) in cotton-growing communities in India, Pakistan and Uzbekistan.

Risks and opportunities

S2.SBM-3_07; S2.SBM-3_09

By assessing impacts and dependencies, we also determine the possible risks and opportunities for our Company. We classify as material those risks associated with workers in our supply chain, related to various types of incidents, such as labour disputes or non-compliance, which is not linked to any specific group of workers.

To address this, we have a number of tools that allow us to anticipate and mitigate the risk, such as our policies, compliance programmes or Ethics Line.

B. Impact, risk and opportunity management

S2-1. Policies related to value chain workers

S2.MDR-P_01-06, S2-1_10

At Inditex, we develop policies that set out the conditions we want our suppliers to pass on to the workers in the value chain, with the aim of:

/ Fostering **respect for human rights** in the supply chain.

/ Providing those who work in our supply chain with the tools for their **empowerment, participation and well-being.**

/ Creating **social value** in the community in a responsible way and driving industry transformation.

These policies also ensure that the third parties with whom we have dealings are aligned with our commitments. Therefore, the manufacturers of the products marketed by the Group, as well as the rest of the supplier companies, are obliged to comply not only with the **Code of Conduct for Manufacturers and Suppliers**, but also with the **Code of Conduct**, insofar as it applies to them.

Policies related to value chain workers

/ Code of Conduct for Manufacturers and Suppliers ⓘ
/ Human Rights Policy ⓘ
/ Code of Conduct ⓘ
/ Sustainability Policy ⓘ
/ Ethics Line Procedure ⓘ
/ Sustainability Stakeholder Relations Policy ⓘ

ⓘ More information on our policies and their updates in section *MDR-P. Policies* of this Report.

Code of Conduct for Manufacturers and Suppliers

S2-1_06

At Inditex we have a Code of Conduct for Manufacturers and Suppliers, which defines minimum standards of ethical and responsible behaviour that must be observed by all of the Group's manufacturers and suppliers across the supply chain, in accordance with our corporate ethical culture, firmly grounded in respect for human rights and sustainability.

Compliance with the Code of Conduct for Manufacturers and Suppliers is a pre-requisite for a supplier or manufacturer to form part of our supply chain.

ⓘ More information on the Code of Conduct for Manufacturers and Suppliers in section *MDR-P. Policies* of this Report.

Respect for human rights in the value chain

S2-1_01; S2-1_02

Our **Human Rights Policy** establishes the principles of respect and promotion of all universally recognised human rights, both labour and non-labour, in our own operations and the value chain.

This Policy is binding for all our workforce as well as for anyone related with the Group, including those who are part of our value chain. For prioritisation purposes, the Policy also identifies the rights connected with the activities of the Group and the stakeholders.

ⓘ More information on the Human Rights Policy in section *MDR-P. Policies* of this Report.

In addition, through this policy, underpinned by the **Sustainability Policy** and the **Code of Conduct for Manufacturers and Suppliers**, we promote fair working conditions in our value chain. Specifically:

/ We embrace the United Nations Sustainable Development Goals (SDGs).

/ We promote and respect human rights in our value chain, within the framework of the United Nations Guiding Principles on Business and Human Rights.

/ We develop measures to prevent, mitigate and remediate negative impacts related to our activity, as well as to the activities of our business partners.

/ We drive sustainability in our value chain alongside our suppliers, contributing to the improvement of supply chain workers' living conditions and to the development of their communities.

S2-1_05

Furthermore, our Code of Conduct for Manufacturers and Suppliers expressly prohibits forced or compulsory labour and child labour, underscoring:

/ Zero tolerance for any form of modern slavery or human trafficking in both its organisation and its supply chain.

/ The **establishment of a minimum age of 16** for recruitment in our value chain, even when local regulations allow for a lower age.

S2-1_03

To guarantee these commitments, we develop mechanisms for collaboration and dialogue with our stakeholders through the supplier clusters and sales and sustainability teams.

Thus, through the new **Sustainability Stakeholder Relations Policy** and the update of our Sustainability Policy, we are prioritising stakeholder engagement on sustainability issues, topics and trends. Accordingly, we undertake, among others, the commitment to listen and actively talk to our stakeholders, as well as to act responsibly, ethically and transparently in our relations with them.

We also have partnerships that allow us to complement this dialogue, such as our Framework Agreement with IndustriALL Global Union and alliances with Action, Collaboration, Transformation (ACT), Ethical Trading Initiative and International Apparel Federation (IAF).

ⓘ More information in section *S2-2.Processes for engaging with value chain workers about impacts* of this Report

S2-1_07;
S2-1_08

Accordingly, we guarantee the application of the principles of our policies, which are grounded on a commitment to respect and promote human rights, as outlined in the UN Guiding Principles on Business and Human Rights.

In this regard, as can be seen from reading them, we construct our policies and Codes of Conduct in line with international principles and benchmark standards.

ⓘ More information in sections *MDR-P. Policies* and *S1-1. Policies related to own workforce* of this Report

Policy-related mechanisms and instruments

S2-1_04

To ensure the proper protection of human rights and compliance with our standards, we use grievance mechanisms, such as our Ethics Line, available to our stakeholders.

ⓘ More information in section *G1-1. Corporate culture and business conduct* of this Report.

Additionally, through our Global Framework Agreement with IndustriALL Global Union, we foster social dialogue in our supply chain and work on dispute resolution mechanisms through the internal communication channel implemented for this purpose.

To address the impacts we have identified, we enact strategies and measures, such as the Workers at the Centre strategy or the initiatives of our Compliance Programme, which are aimed at support and remediation in the event of supplier non-compliance.

S2-1_09

Accordingly, to identify and manage potential non-compliances linked to the rights of supply chain workers, we conduct regular and periodic social audits. These ensure that our standards and the Code of Conduct for Manufacturers and Suppliers are upheld. In section G1-2 of this Report, we provide the ratio of compliance with the different parts of the Code by the factories in our supply chain.

ⓘ More information in section *G1-2. Management of relationships with suppliers* of this Report.

Our Ethics Line also allows us to monitor notifications regarding non-compliances, thus enabling us to identify any gaps in our Code of Conduct for Manufacturers and Suppliers and Human Rights Policy, and to activate the necessary mechanisms to manage them.

S2-2. Processes for engaging with value chain workers about impacts

S2-2_01; S2-2_02; S2-2_03; S2-2_05

We believe that the relationship with the people who are part of our value chain is fundamental to correctly manage the actual and potential impacts that may affect them.

To this end, we have different relationship and dialogue mechanisms to listen to their views and take them into account in our decision making, adapting our strategies to suit their needs.

Through our ten supplier clusters, we are able to generate local spaces for dialogue and collaboration on the ground, allowing us to learn the perspectives and needs of these groups and inform our strategies.

It is important to highlight the audit processes we regularly conduct at our manufacturers and suppliers. During the course of these audits, our teams are in direct contact with people working in our supply chain through interviews with them and their representatives.

ⓘ More information on our supplier clusters in section *G1-2. Management of relationships with suppliers* of this Report.

Another of our main tools in relation to our supply chain workers is our **Global Framework Agreement** with IndustriALL Global Union, which we signed in 2007 and renewed in 2019.

This Global Framework Agreement allows us to foster worker participation and respect for the rights of freedom of association and collective bargaining. It also gives us a crucial direct listening channel to inform our strategies, enabling us to:

/ Manage incident at any workplace in the supply chain by fostering social dialogue.

/ Facilitate the involvement of our supply chain workers' legitimate representatives.

We have also established mechanisms for joint access to workplaces as well as for managing disputes at our supply chain as part of the Global Framework Agreement with IndustriALL.

ⓘ More information on our Global Framework Agreement with IndustriALL Global Union in section *S2-4. Actions related to value chain workers* of this Report.

In addition to this tool, we also have our Ethics Line for reporting any potential non-compliance with our policies and codes.

ⓘ More information on the Ethics Committee in section *G1-1. Corporate culture and business conduct* of this Report

Lastly, our **double materiality assessment**, which we update every year, allows us to incorporate the perspectives of expert organisations. This means we can set up a channel for communications with our stakeholders regarding matters that are important to the people in our supply chain and the potential impacts that may affect them.

ⓘ More information on stakeholder engagement and our materiality assessment in sections *SBM-2. Interests and views of stakeholders, SBM-3. Material impacts, risks and opportunities* and *IROs. Disclosures on the materiality assessment process* of this Report.

S2-2_06

As a result of these collaborative efforts, we have agreements with various organisations such as our Public-Private Partnership with the International Labour Organization and the Global Framework Agreement with IndustriALL Global Union.

Additionally, our collaborations are embodied in various actions as part of the Workers at the Centre strategy, which we evaluate by monitoring each project using general and/or specific indicators, depending on the initiatives.

We also gauge the effectiveness of our efforts by conducting audits of our suppliers and manufacturers. Lastly, our clusters are a key tool in determining the effectiveness of our collaborations because of their ongoing communication with local Revstakeholders.

S2-2_04

The Chief Sustainability Officer oversees the implementation of the sustainability strategy, including stakeholder engagement, in particular with people working in our supply chain and suppliers.

ⓘ More information in section *GOV-2. Information provided to governing bodies and sustainability matters addressed* of this Report.

Focus on vulnerable groups

S2-2_07

Although we consider all people in the supply chain, we develop **a special focus on particularly vulnerable groups**.

We have therefore introduced in our Workers at the Centre strategy a specific focus for women, migrants and people with disabilities, or workers involved in the production of raw materials. In this way we aim to listen to those people who are least represented and who may be most affected.

S2-3. Processes to remediate negative impacts and channels for value chain workers to raise concerns

Processes to remediate negative impacts

S2-3_01

The identification of potential and actual negative impacts related to our activity allows us to increase our capacity to prevent, mitigate and remediate their effects. That is why we endeavour to assess the impacts linked to those working in our supply chain.

To achieve this we implement due diligence processes and we activate grievance mechanisms, which help us detect potential negative impacts and introduce the necessary measures to prevent, mitigate and remedy their effects.

ⓘ More information in section *GOV-4. Statement on due diligence* of this Report.

Our main **remediation tools** are:

/ The **projects covered by the Workers at the Centre strategy** —which focus on managing the impacts identified in our due diligence process in human rights— allowing us to implement initiatives aligned with our Priority Impact Areas.

ⓘ More information on the Workers at the Centre strategy in section *S2-4. Actions related to value chain workers* of this Report.

/ **Corrective Action Plans (CAPs)**, part of our compliance programme, through which we develop roadmaps to support suppliers to correct and prevent any non-compliance with our Code of Conduct for Manufacturers and Suppliers that is detected through social audits.

ⓘ More information on Corrective Action Plans (CAPs) in section *G1-2. Management of relationships with suppliers* of this Report.

/ **Specific Remediation Plans for protection against child labour and the safeguarding of refugees**, focused on the special protection of these vulnerable groups.

/ **Remediation measures carried** out in the framework of our collaboration with IndustriALL Global Union.

Main communication and grievance mechanisms

S2-3_02; S2-3_04; S2-3_06; S2-3_11; S2-3_12

Value chain workers have access to the **Ethics Line**, which is available to all our stakeholders. The procedure for managing communications received from value chain workers through the Ethics Line and ensuring the channel's efficacy is the same as for those received from other stakeholders and is outlined in the relevant chapter of this Report.

ⓘ More information on how the Ethics Line works, including monitoring, control and assurance of its effectiveness, in section *G1-1. Corporate culture and business conduct* of this Report.

S2-3_03; S2-3_05; S2-3_09; S2-1_11

To ensure that supply chain workers are aware of our Ethics Line, in addition to including information and facilitating their access via the corporate website, the Code of Conduct for Manufacturers and Suppliers explicitly designates this channel as a preferred and confidential channel available to them. This code, which must be accepted in order to be able to work with Inditex, requires manufacturers and suppliers to:

/ Post the Code of Conduct for Manufacturers and Suppliers, translated into the local language, on their premises.

/ Appoint a management representative who is responsible for the implementation of the Code of Conduct for Manufacturers and Suppliers.

Compliance with the requirements of the Code, including it is available to workers, is verified through social audits we carry out regularly at our manufacturers and suppliers.

S2-3_10

Furthermore, workers can also use external grievance channels designated by the competent authorities.

S2-3_02; S2-3_10

Our **Framework Agreement with IndustriALL Global Union** also constitutes a specific communication and contact mechanism, reinforcing the other available grievance mechanisms. Its functioning is articulated through the relationship with local affiliates, the legitimate workers' representatives, who channel their concerns via an escalation process developed between Inditex and IndustriALL with the aim of promoting social dialogue.

S2-3_05

For a better understanding of the main points of the Global Framework Agreement, we provided training for local affiliates in different countries. This strengthens the knowledge of the people working in our supply chain regarding this mechanism, so as to foster social dialogue in our supply chain as a way of solving any incident that may be reported to Inditex through our Global Framework Agreement with IndustriALL.

S2-4. Actions related to value chain workers

S2-4_10

We strive to implement practices and strategies that minimise any potential impacts related to our activity that could affect workers in our supply chain.

Consequently, we are committed to implementing responsible purchasing practices to avoid potential impacts on the working conditions, wages or benefits of workers.

In addition, we conduct thorough human rights due diligence, supported by an ongoing exercise to identify and prioritise potential human rights impacts.

ⓘ More information on our due diligence regarding human rights in section *GOV-4. Statement on due diligence* of this Report.

S2-4_01; S2-4_05 S2-4_06; S2-4_13; S2-4_16

Through this due diligence exercise, in addition to our materiality assessment, we identify the potential impacts that our activity may have on our value chain workers.

This assessment enables us to identify the actions needed to prevent, mitigate and remediate these impacts, as well as to set up strategies to transfer the positive effect to our supply chain.

To manage our supply chain impacts, we take a collaborative approach to global and local implementation, from a systemic perspective. To this end, we developed a number of tools, including:

/ **Workers at the Centre strategy**: it aims to strengthen the protection of human rights and incorporates an approach to transformation and impact into our relationship with the people working in the supply chain.

This strategy is structured into five PIAs (Social dialogue, Living wages, Respect, Health and Resilience) with specific targets and lines of action that are materialised through partnerships, solutions and initiatives on the ground, developed by our teams or along with partner organisations. In their design and development we apply the Theory of Change to launch transformative initiatives on the basis of the expected benefit for people.

/ **Programme for Compliance with the Code of Conduct for Manufacturers and Suppliers**: it ensures compliance with Inditex's regulations regarding our supply chain, enabling us to trigger action mechanisms in the event of non-compliances. Specifically, this programme is structured through audits, Corrective Action Plans (CAPs) and training, among other measures.

ⓘ More information on the Compliance Programme in section *G1-2. Management of relationships with suppliers* of this Report.

We also have specific **Remediation Plans for protection against child labour and the protection of refugees**, which include special measures for prevention, detection and remediation in cases of child, forced or irregular labour, by providing support and remediation for the affected person.

Workers at the Centre

The Workers at the Centre 2023-2025 strategy is based on **respect for the human rights** of the workers in the supply chain. Our **goal is to reach three million people by 2025.**

Priority Impact Areas



Social dialogue

Facilitating mature industrial relations as a vehicle for a more participative society.



Living wages

Setting the conditions for the achievement of Living Wages in the Inditex supply chain.



Respect

Promoting safe and respectful environments, free from discrimination, abuse or harassment.



Health

Protecting the health and safety of workers in the supply chain, and improving their well-being.



Resilience

Contributing to create preventive, adaptive and transformative capacities for development.

Elements of the strategy



/ Due Diligence

A continuous process, based on the UN Guiding Principles on Business and Human Rights, allowing us to identify five Priority Impact Areas. These areas are synergetic and interconnected.



/ Transformation

Transformation is a slow process and requires the commitment and collaboration of various parties. Our Workers at the Centre strategy connects us to the present and the challenges it poses, without losing sight of our ultimate goal, which is to transform the industry and communities.



/ Equal opportunities as our focus

We make more visible and integrate the needs of the most vulnerable groups, including women, migrants and refugees.



/ Solutions

Priority Impact Areas develop, support and combine different types of solutions and interventions to pursue their objectives: partnerships, collaborations with different stakeholders, direct interventions with suppliers or community outreach, among others.

All the approaches complement each other and, at different paces and scales, contribute to and are part of implementing the strategy.

Workers at the Centre 2024:

1,817,233
People
reached by the strategy

2,429
Suppliers and factories
involved in the strategy

35
Initiatives and solutions
developed in factories and/or communities

S2.MDR-A_01-12; S2-4_03; MDR-A_03

Our **Workers at the Centre** strategy, whose new cycle started in 2023 and will end in 2025, is based on the respect and promotion of human rights and the creation of social value.

For this reason, the actions carried out under our strategy go beyond mitigation and/or remediation of potential negative impacts, with initiatives aimed at generating positive change for our supply chain workers and their communities.

In this way, we aim to have a **diverse, inclusive and safe value chain** for workers, made up of committed suppliers and manufacturers, while ensuring decent conditions and adequate levels of well-being.

Collaboration and support

S2-4_14

To achieve this, at Inditex we believe in the culture of collaboration as a means to leverage our effect and achieve a lasting impact. On this regard, we implement measures aimed at our value chain workers in partnership with local and international expert organisations such as ACT (Action, Collaboration, Transformation), Ethical Trading Initiative (ETI), IndustriALL Global Union, International Accord, the International Labour Organization (ILO), Reimagining Industry to Support Equality (RISE) and many others.

Our local teams, who are present in our main supplier markets, play a key role in the management and implementation of our actions.

S2-4_13

Likewise, we believe in supporting **our suppliers** to address supply chain challenges as a shared responsibility. That is why we provide continuous and specialised training on issues such as gender equality, freedom of association, living wages, and health and safety.

One example of this is our EVOLVES initiative which, through direct collaboration with suppliers and manufacturers, is aimed at developing facility management systems to furnish them with efficient tools and operating practices that guarantee and reinforce respect for the rights of supply chain workers.

Likewise, the close relationship between our purchasing and sustainability teams and our suppliers is crucial. We have local teams in our main production markets, our clusters. This allows us to pay special attention to the context of these regions.

S2-4_15

This ongoing communication and collaboration is crucial in the design and implementation phases of our actions within the Workers at the Centre strategy.

We work with key players like **the international trade union federation IndustriALL**, with which we signed a Global Framework Agreement in 2007. An important tool for promoting worker participation and respect for the rights of freedom of association and collective bargaining.

Similarly, we work with **Shift,** a leading organisation in human rights and business, in the framework of the conceptualisation of the due diligence exercise. The analysis of this exercise, along with other information sources, allows us to develop the Priority Impact Areas of our strategy.

ⓘ More information on the strategy in the report *Workers at the Centre*, available on Inditex's corporate website.

Priority Impact Areas of the Workers at the Centre strategy

Social dialogue

Related IROs: [S2.I1; S2.I3; S2.R1; S3.I1; S3.I2; S3.R1]

MDR-A_01; MDR-A_02

We see social dialogue as a tool to help us foster more mature industrial relations as a vehicle for a more participatory society.

To achieve this, we have a range of partnerships and collaborations and we work on two main lines of action: the participation of workers and dialogue ecosystems.

Worker participation

We have endeavoured to promote communication and dispute resolution mechanisms like the internal communication channel of the Global Framework agreement; the Interim Dispute Resolution Mechanism in Bangladesh relating to freedom of association and the payment of wages and benefits for workers under the ACT initiative or the International ACCORD's Complaints Mechanism, among others.

Main initiatives in 2024:

/ Implementation of the Global Framework Agreement with IndustriALL Global Union (global).
/ Training on the Global Framework Agreement (Bangladesh).
/ Training for local affiliates of IndustriALL concerning the mechanisms of the Global Framework Agreement (Cambodia, Türkiye).

Ecosystems for dialogue

We also aim to empower the representatives of workers and employers through social dialogue platforms at the local or industry level. For this purpose we work actively on representation mechanisms and raising awareness regarding industrial relations and other spheres such as occupational health and safety or women's empowerment.

Main initiatives in 2024:

/ Collaboration through the ACT initiative (Bangladesh, Cambodia, Türkiye).
/ Better Work programme (Bangladesh, Cambodia, Egypt, Indonesia, Pakistan, Vietnam).
/ Programme for the promotion of social dialogue (India).
/ Improving operational grievance mechanisms (Türkiye).
/ Training on improving employee relations (Cambodia, China).

MDR-A_04; MDR-A_05

Results of the social dialogue PIA in 2024:

/ 670,281 people reached, which brings the figure to 741,076 people reached since the start of this strategy cycle in 2023.
/ 325 suppliers and factories involved.
/ Key markets: Bangladesh, Cambodia, China, Egypt, India, Indonesia, Pakistan, Türkiye, Vietnam.

S2-4_17

Contribution to the SDGs



Living wages

Related IROs: [S2.I1; S2.I2; S2.R1; S3.I1; S3.I2; S3.R1]

MDR-A_01; MDR-A_02

In our view, paying workers living wages can only be achieved by means of effective collaboration at industry level between workers' representatives and employers, complemented by responsible purchasing practices.

Necessary conditions for collective bargaining

We work to foster collective bargaining agreements at industry level, underpinned by improvements in responsible purchasing practices.

Main initiatives in 2024:

/ Collaboration through the ACT initiative (Bangladesh, Cambodia, Türkiye).
/ Implementation of the Global Framework Agreement with IndustriALL Global Union (global).

Responsible purchasing practices

Responsible purchasing practices can help create an environment that is conducive to improving working conditions, wages and benefits for workers in the supply chain.

That is why we are adhered to the ACT's five commitments in relation to purchasing practices and we train our sales teams to make responsible purchasing decisions, providing them with a management system that measures the sustainability performance of each supplier and factory.

Main initiatives in 2024:

/ Responsible purchasing practices with ACT.
/ Training buyers at the Inditex Sustainable Fashion School.

Management systems and favourable practices
We opt to take a holistic approach, including creating an ecosystem conducive to favourable conditions —skills enhancement, increased productivity, effective wage management systems, financial literacy, etc.— and lays a solid foundation for the payment of living wages to supply chain workers.

Main initiatives in 2024:

/ Wage management project (China).
/ Lean Project (Bangladesh, Cambodia, China, Morocco, Portugal, Vietnam).
/ Look Through Another Window project (Türkiye).
/ RISE Digital project (Pakistan).
/ RISE Financial Health project (Cambodia, Egypt, Vietnam).

MDR-A_04; MDR-A_05

Results of the living wages PIA in 2024:
/ 86,268 people reached, which brings the figure to 100,454 people reached since the start of this strategy cycle in 2023.
/ 67 suppliers and factories involved.
/ Key markets: Bangladesh, Cambodia, China, Egypt, Morocco, Pakistan, Portugal,Türkiye, Vietnam.

Contribution to the SDGs

S2-4_17



Respect

MDR-A_01; MDR-A_02

Related IROs: [S2.I5; S2.R1; S3.I1; S3.I2; S3.R1]

We aim to promote safe and respectful environments, free from discrimination, abuse or harassment.

To achieve this, we endeavour to create respectful work environments free from any kind of violence and harassment, along with a fair recruitment and employment culture.

Respectful work environments free from any kind of violence and harassment
ILO Convention No. 190 and Recommendation No. 206 are the first international labour standards that provide a common framework to prevent, remediate and eradicate violence and harassment in the world of work, including gender-based violence and harassment. We promote, support, collaborate and implement all necessary measures to foster engagement in these areas.

Main initiatives in 2024:

/ Training on respect and equality (Türkiye).
/ Training on the development of zero tolerance policies towards violence (Türkiye).
/ Working parent support programme (China).
/ EDUCARE project (Morocco).
/ Harmony project (Türkiye).
/ LGBTQI+ Awareness project (Portugal).
/ Parwaaz project - Disability management in the workplace (Pakistan).
/ RISE Respect project (Bangladesh, India).
/ Together Strong project (Türkiye).
/ Workplace Adaptation project (Türkiye).

Fair recruitment and employment culture
Having fair recruitment and employment practices is key to achieving decent working conditions. At Inditex, we take a zero tolerance policy towards child labour and any kind of forced labour, issues that are reflected in our Code of Conduct for Manufacturers and Suppliers.

We also have a supply chain management system in place that includes aspects such as audits, corrective plans, awareness-raising, etc. They allow us to identify and remediate potential violations, and to adopt the necessary action if any breaches are detected.

Main initiatives in 2024:

/ Remediation programme for migrant workers (Türkiye).

/ *Sowbhagyam* project (India).

MDR-A_04;
MDR-A_05

Results of the Respect PIA in 2024:

/ 174,917 people reached, which brings the figure to 222,240 people reached since the start of this strategy cycle in 2023.
/ 369 suppliers and factories involved.
/ Key markets: Bangladesh, China, India, Morocco, Pakistan, Portugal, Türkiye.

S2-4_17

Contribution to the SDGs



Health

MDR-A_01;
MDR-A_02

Related IROs: [S2.I4; S2.R1; S3.I1; S3.I2; S3.R1]

We aim to protect the health and safety of supply chain workers and improve their well-being, through three lines of action: physical health, workplace safety and well-being.

To achieve this, we work with various organisations such as International Accord for Health and Safety in the Textile and Garment Industry, Medicus Mundi Sur, RMG Sustainability Council (RSC), St. John's Medical College and the University of Oxford.

Physical health
We continue our commitments and initiatives aimed at reinforcing the evaluation, support and improvement of compliance with our Code of Conduct for Manufacturers and Suppliers.

Main initiatives in 2024:

/ OHS Corrective Action Plan (global).

/ Project in collaboration with Medicus Mundi (Morocco).

Workplace safety
We work to promote safe and adequate facilities and workplaces for workers, as well as to provide training for both employees and management to effectively manage workplace safety.

Main initiatives in 2024:

/ Accord-CAP Remediation project (Bangladesh, Pakistan).

/ SAFER project (China, Morocco, Vietnam).

/ Boiler safety project (Morocco).

/ Suraksha: fire & electrical system assessment + thermography project (India).

Well-being
We believe that general well-being should be addressed in the supply chain by taking care of mental, emotional and even social health, safeguarding a workplace culture of well-being and fostering the dissemination of knowledge. Accordingly, we encourage open communication on matters relating to health and safety issues and we promote safe and healthy behaviours.

Main initiatives in 2024:

/ SAKHI Menstrual Rights project (India).

/ Suraksha: Safety Management Systems (SMS) project (India).

Occupational Health and Safety Corrective Action Plans

In 2024, we have strengthened our commitment to this initiative, broadening the scope of suppliers and factories to be involved and stepping up efforts and resources to improve health and safety conditions in our supply chain, thereby ensuring greater compliance with our CCMS and the applicable legislation.

In this regard, we design our Corrective Action Plans in collaboration with suppliers or manufacturers, analysing the necessary improvements in each individual case. Subsequently, a specialised team carries out ongoing monitoring of their implementation, providing guidance to the supplier or manufacturer, overseeing progress, and verifying the improvements implemented.

MDR-A_04; MDR-A_05

Results of the Health PIA in 2024:

/ 1,313,217 people reached, which brings the figure to 1,694,407 people reached since the start of this strategy cycle in 2023.

/ 1,806 suppliers and factories involved.

/ Key markets: Bangladesh, China, India, Morocco, Pakistan, Vietnam.

S2-4_17

Contribution to the SDGs



Resilience

MDR-A_01; MDR-A_02

Related IROs: [S2.I1; S2.R1; S3.I1; S3.I2; S3.R1]

We want to contribute to generating preventive, adaptive and transformative capacities to ensure prosperous livelihoods and create more resilient suppliers and communities.

Social protection

We are engaged in ensuring adequate and sufficient social security access in the supply chain, by periodically assessing the compliance performance of factories and suppliers and, if necessary, implementing and monitoring corrective action plans.

Main initiatives in 2024:

/ Employment Injury Scheme (EIS) pilot programme in Bangladesh (Bangladesh).

/ Happiness for All (India).

Just transition and the future of work

We want to ensure that a human rights-based approach is systematically incorporated into our climate commitments. In this way, human rights experience and practice are combined with environmental plans and actions, thereby ensuring that the social impact is taken into account. We also strive to understand how jobs and skills are going to evolve.

Main initiatives in 2024:

/ Rise Foundations project (China, Vietnam).

Prosperous livelihoods

We focus primarily on the livelihoods of people involved in the production of raw materials, including those in the agricultural sector. To address these challenges, we apply a holistic approach that encompasses traceability, due diligence and a commitment to respect for and promotion of human and labour rights.

Main initiatives in 2024:

/ Public-private partnership with the International Labour Organization (India, Pakistan, Uzbekistan).

/ Child & Women Friendly Mobile Areas project (Türkiye).

/ Collaboration projects for promoting regenerative agricultural practices (India).

MDR-A_04; MDR-A_05

Results of the Resilience PIA in 2024:

/ 59,823 people reached, which brings the figure to 69,804 people reached since the start of this strategy cycle in 2023.

/ 58 suppliers and factories involved.

/ Key markets: Bangladesh, China, India, Pakistan, Türkiye, Uzbekistan, Vietnam.

S2-4_17

Contribution to the SDGs



Further considerations

S2-4_12; MDR-A_06; MDR-A_07

The financial resources linked to implementing these actions, do not imply a material amount on their own. They are included under Operating Expenses in the Consolidated Income Statement (see *Note 6* of the Consolidated Annual Accounts).

S2-4_18

In this regard, we highlight the role of our local teams, who are present in the main supplier markets, in the management and implementation of our actions.

S2-4_04

We monitor our actions in detail to examine and validate their effectiveness.

To this end, we have common indicators for all the actions, such as the number of people reached, and individual indicators applicable to each type of initiative depending on its nature, which we obtain through different methods such as surveys of the supply chain workers.

In addition, in some cases we also undertake monitoring visits to assess the correct implementation of the projects. In 2024, we conducted 776 of these monitoring visits (821 visits in 2023).

S2-4_02

In the process of analysing and monitoring our impacts, we pay special attention to the potential materialisation of their effects, in order to establish preventive measures and, should they occur, mitigation measures.

In those cases where we identify that the impact has occurred or is occurring, we activate specific action plans that allow us to:

/ Minimise the negative effect on people in the supply chain.

/ Endeavour to remediate it as much as possible.

/ Apply a dual perspective of prevention to minimise the chances of its recurring in the future.

An example of this is our **Remediation Plans**, which are activated if a potential incident of child, forced or irregular labour is detected.

Remediation Plans

/ **Child labour remediation plan**: we implement a mandatory process that is triggered if a worker under the age established in our Code of Conduct for Manufacturers and Suppliers is found. From the moment it is activated, suppliers and factories are responsible for developing and implementing a series of feasible corrective actions, as well as providing schooling opportunities for the child and paying the child a living allowance until the minimum working age is reached or, alternatively, employing an adult family member in place of the child, among other measures aimed at reducing the likelihood of the child returning to the world of work. In addition, to ensure compliance, our teams continuously monitor compliance, also in collaboration with external expert organisations.

/ **Refugee and migrant remediation plans:** they are carried out if our assessments identify migrant or refugee workers in any of the production facilities with whom we work. In these plans we assess the working and living conditions of these workers in order to provide support to them and their families if necessary, in collaboration with expert NGOs.

S2-4_07

In addition to the aforementioned support visits, within the framework of our Compliance Programme we conduct **social audits** regularly and without previous notice of the specific date of the audit to all suppliers and manufacturers in our supply chain, following both our own methodology and that of the Social & Labor Convergence Program (SLCP).

These audits allow us to verify compliance with our Code of Conduct for Manufacturers and Suppliers and consist of an unannounced site visit to verify wage rates, working hours, health and safety conditions, among other requirements. Depending on the degree of compliance, suppliers and manufacturers receive a social rating.

Accordingly, we use **Corrective Action Plans (CAPs)** to support suppliers in their improvement processes and help them to correct and prevent non-compliances. However, we maintain a zero tolerance policy with those who do not show a willingness to improve, and so if the final verification audit shows critical non-compliances at the end of the CAP, Inditex's business relationship with the factory or supplier will be terminated.

S2-4_11

These social audits and Corrective Action Plans allow us to monitor and control potential incidents regarding supply chain workers' rights. We report the results of these audits grouped by theme in this Report.

ⓘ More information in section *G1-2. Management of relationships with suppliers* of this Report.

We also work to identify those stages of our supply chain that are most susceptible to potential human rights violations, in order to multiply our prevention efforts on them. This has led us to identify greater vulnerability in the raw material cultivation phase. For this reason, we work hand in hand with the International Labour Organization (ILO), within the framework of our Public-Private Partnership, for the promotion and respect of the Fundamental Principles and Rights at Work (FPRW) in India, Pakistan and Uzbekistan.

Furthermore, value chain workers also have access to the Ethics Line for reporting any type of infringement or irregularity concerning human rights. In 2024, no inherently severe incidences human rights violations in our supply chain have been detected through this channel.

ⓘ More information in section *G1-1. Corporate culture and business conduct* of this Report.

S2-4_08

The implementation of these actions and our Compliance Programme also play an important role in minimising our **material risks**, by reducing our risks relating to supply chain workers.

S2-4_09

On the other hand, regarding opportunities, we continue to work to deepen our analysis in order to be able to provide more insight in future reporting exercises. In 2024 we have not identified any material opportunities in relation to our supply chain.

Agreements and collaborations

At Inditex we understand that our sustainability targets for the supply chain are shared by other stakeholders. Accordingly, we take and open and collaborative approach with a range of organisations and we actively participate in the industry's global initiatives as the driving force for transformation. In this regard, we carry out our actions aimed at our value chain workers in partnership with local and international expert organisations. These include ACT (Action, Collaboration, Transformation), Ethical Trading Initiative (ETI), IndustriALL Global Union, International Accord, the International Labour Organization (ILO), Reimagining Industry to Support Equality (RISE), Medicus Mundi and many others.

ⓘ More information in the report *Partnerships* on Inditex's corporate website.

C. Metrics and targets

S2-5. Targets related to value chain workers

S2.MDR-T_01-13

• Reaching three million people with the Workers at the Centre strategy

MDR-T_01

We have set ourselves the target of reaching three million people through our Workers at the Centre strategy between 2023 and 2025.

This target is linked to our Human Rights Policy and its commitment to play an active role in promoting human rights and to proactively work towards their respect, both in our own operations and in the value chain.

MDR-T_02; MDR-T_05; MDR-T_06; MDR-T_07; MDR-T_08; MDR-T_13

Target: reaching three million people with the Workers at the Centre strategy by 2025

	Current period	Target year
	2023-2024	2025
People reached since 2023	2.2 million	3 million

S2-5_04

For this purpose, as with our Workers at the Centre strategy of which it is a part, we aim to guarantee respect for the human and labour rights of our supply chain workers and to promote their well-being and that of their communities. To achieve this we design various projects based on the Theory of Change methodology in each of the PIAs with specific targets set.

ⓘ More information in the report *Workers at the Centre*, available on Inditex's corporate website.

MDR-T_11; S2-5_01; S2-5_02; S2-5_03

A key factor in designing our strategy, targets and actions is close continuous collaboration and dialogue with specialist organisations and leading players in our value chain.

Through constant communication with these organisations, we are also able to track how effective our actions are and define new areas for improvement to fulfil our strategies and goals.

Moreover, the Global Framework Agreement with IndustriALL provides a direct communication channel with workers in our supply chain through their representatives, giving us valuable insight into their needs and our performance.

MDR-T_03; MDR-T_04; MDR-T_05; MDR-T_06; MDR-T_09; MDR-T_12

ⓘ More information on the scope, methodology and calculation changes in the year in the *Methodological Annex* of this Report.

S3. Affected communities

A. Strategy

SBM-3. Material impacts, risks and opportunities

At Inditex we see the community as one of our stakeholders, and our relationship model encompasses those people or entities that are a part of the environment where we operate, represented by NGOs, governments and public authorities, academic institutions, media and civil society. Bearing this in mind, we have compiled the following list of material impacts, risks and opportunities related to communities.

Material Impacts, Risks and Opportunities related to communities

		TYPE (I/R/O)	PHASE OF THE VALUE CHAIN [1]	AFFECTED POLICIES
S3.I1	**Value generation and community investment**	I	/ Extended value chain	**Transversal policies:** / Code of Conduct / Code of Conduct for Manufacturers and Suppliers / Human Rights Policy / Sustainability Policy / Sustainability Stakeholder Relations Policy **Specific policies:** / Community Investment Policy / Ecosystems and Biodiversity Policy
S3.I2	**Possible violations of local communities' rights**	I	/ Extended value chain	
S3.R1	**Risks related to local communities' rights**	R	/ Extended value chain	

[1] The extended value chain comprises the environment and the communities in which we are present even if they are not directly linked to our activity.

ⓘ More information on stakeholder engagement and our materiality assessment in sections *SBM-3. Material impacts, risks and opportunities* and *IROs. Disclosures on the materiality assessment process* of this Report.

Scope

S3.SBM-3_01; S3.SBM-3_02; S3.SBM-3_03; S3.SBM-3_07

In our assessment, we take into consideration the community, bearing in mind the various ways in which it might be affected by our activity. Consequently, we identify those people who might be impacted by our activity, whether positively or negatively.

Accordingly, we take into consideration the communities linked to our own operations (near our offices, logistics centres, etc.), as well as to our value chain, including from the extraction of raw materials to the product's end-of-life management.

We also take into consideration those groups whose specific characteristics make them **more vulnerable to potential negative impacts**. This is the case, for example, of women, children, migrants and refugees, people with disabilities, people at risk of exclusion, indigenous communities and others.

We have also identified a potential vulnerability in connection with the processes of extraction of the raw materials used in our products. We therefore continue to work on improving traceability at the industry level of the materials used to make the products. The aim being to minimise and be able to remediate any negative impacts on communities' rights from our supply chain activities.

However, our community investment strategy is not only confined to those communities most closely linked to our activity, but also encompasses other communities, less directly affected by our operations or those of our value chain, but whom we also want to support through our programmes.

Occurrence and types of impacts

S3.SBM-3_04

Negative impacts related to the community may have a range of causes, linked to situations such as potential breaches of cultural rights or more systemic ones such as the potential adverse impact of our activities on the communities' right to a healthy environment.

As part of our commitment, we have implemented mechanisms to prevent both kinds of possible impacts and, should they occur, address them. In this regard, we respect the rights of communities when implementing our actions and we have expanded initiatives such as Workers at the Centre with the aim of transferring their effect not only to value chain workers but to their communities. This is especially significant in communities linked to the production of raw materials.

Furthermore, we implement measures to ensure **respect for human rights**, including the cultural rights of communities. We have an internal team that is responsible for ensuring that our products are developed in keeping with these rights.

Moreover, we consider our indirect impacts on communities, such as those relating to the environment. In this connection, we carry out initiatives to promote respect for people's right to live in a healthy environment.

S3.SBM-3_05

At Inditex we are committed to **generating a positive impact** on the community as a whole. To do so, we design initiatives that enable us to transfer and generate value for people by creating direct, indirect and induced employment as a result of our activity, fostering an improvement in living standards and improving communities' well-being.

In this regard, we have a **community investment strategy**, whereby we carry out numerous projects with different focuses. Through this programme we contribute to sustainable development beyond our value chain and industry.

In this sense, we highlight our support to initiatives aimed to safeguard the lives, health and well-being of forced migrants and refugees, as well as other vulnerable groups facing humanitarian emergency situations, such as natural disasters, armed conflicts or similar circumstances.

ⓘ More information on related actions in section *S3-4. Actions related to communities* of this Report.

Risks and opportunities

S3.SBM-3_06

By analysing our impacts and dependencies we can identify those material risks and opportunities for our Company arising from the community.

This in turn allows us to implement initiatives that help us prevent, mitigate and remediate potential negative effects before they occur. In this regard, we consider members of the community as legitimate users of the Ethics Line, so that they can report any infringement or irregularity related to their rights. Through this grievance mechanism we can monitor, manage cases,make appropriate decisions and take the necessary measures, thereby helping to prevent the potential risk of sanctions and compensation due to rights-related breaches or incidents.

S3.SBM-3_08

The risks and opportunities identified relate to the community as a whole; no specific dependence on any particular group has been identified.

B. Impact, risk and opportunity management

S3-1. Policies related to communities

S3.MDR-P_01-06; S3-1_08

Our policies concerning the management of community impacts, risks and opportunities, apply to all affected persons, regardless of their proximity to our own operations or value chain.

Policies related to the community

/ Community Investment Policy ⓘ
/ Human Rights Policy ⓘ
/ Ecosystems and Biodiversity Policy ⓘ
/ Code of Conduct ⓘ
/ Sustainability Policy ⓘ
/ Ethics Line Procedure ⓘ
/ Sustainability Stakeholder Relations Policy ⓘ

ⓘ More information on our policies and their updates in section *MDR-P. Policies* of this Report.

MDR-P_01; MDR-P_02; MDR-P_03; MDR-P_04; MDR-P_05

In particular, we highlight the role of our **Community Investment Policy**, which helps us to regulate our strategy's projects focused on creating a lasting impact in the community from strategic support for long-term projects.

Community Investment Policy

Approved by the Board of Directors in June 2014 and last updated on 3 May 2023

Key contents	/ Committed improvement of community wellbeing, maximisation of community value generation and construction of strategic alliances / Alignment across the community initiatives pursued within the Group and collaboration channel for participation in community initiatives / Framework of priority activity areas (education, emergency relief and environment)
Scope	/ The entire Group (companies and individuals) / Other natural or legal persons linked to Inditex, when possible due to the nature of the relationship and when conducive to compliance
Accountable for the implementation	/ Sustainability department and its chief officer
Third-party standards	/ 2030 Agenda and UN Sustainable Development Goals (SDGs) / Paris Agreement on Climate Change
Consideration given to stakeholders	/ Participation of the Social Advisory Board

S3-1_02

Respect for community human rights

At Inditex we are committed to **respecting community human rights**, a commitment enshrined in our Sustainability Policy, and, more extensively, in our Human Rights Policy. Likewise, we want our activity to contribute to the development of a fair society, in balance with the planetary boundaries.

Hence, in our Code of Conduct, pursuant to our relationship with our surrounding environment, we commit to:

/ Promoting the sustainable development of the communities and areas in which we operate, by fostering voluntary initiatives and projects.

/ Collaborating with communities and organisations related to our Group.

Along these lines, our **Human Rights Policy** advocates the special protection of communities. It establishes as a principle the fostering and promotion of human rights in the local, national or international communities in which the Group conducts its business. In particular, the policy underscores our explicit commitment to upholding the rights of local communities by respecting their laws, culture and customs; open dialogue with stakeholders and attention to the most vulnerable groups.

Likewise, our **Sustainability Policy** reflects our aim to nurture the well-being of people and communities, promoting multiculturalism and recognising the importance of the right to a clean, healthy and sustainable environment.

S3-1_06

Our policies are based on our commitment to respect and promote all internationally recognised human rights, as set out in the United Nations Guiding Principles on Business and Human Rights, and to promote human rights in the communities in which we operate. In this regard, as can be seen from their details, we construct our policies in line with international principles and benchmark standards.

S3-1_01;
S3-1_03

Importantly also, our commitment to respecting community human rights includes **indigenous communities**, in line with our Sustainability Policy. This is also explicitly stated in our Ecosystems and Biodiversity Policy, which sets out Inditex's commitment to responsible sourcing, production and other practices in the value chain that respect and protect the human rights of the community, with a particular emphasis on the rights of indigenous peoples.

S3-1_04

Moreover, the new **Sustainability Stakeholder Relations Policy** addresses the incorporation of stakeholders into the relevant topics and issues, committing to active listening and dialogue.

In order to implement these principles, as well as other commitments emanating from our policies with respect to the community, we engage in active dialogue with the individuals who make up the community through the direct relations with the various NGOs with which we work. These include our long-term partners Médecins Sans Frontières (MSF), the Red Cross, Water.org and others.

We also pursue this relationship through the work of our Social Advisory Board and the Sponsorships and Patronage Committee, which is directly linked to our community investment strategy.

S3-1_05

Policy-related mechanisms and instruments

We are supported by our grievance mechanisms to improve our due diligence process, helping us to identify potential negative impacts, and allowing us to respond to risks in advance. One such mechanism is our **Ethics Line**, available to people in the community for them to convey, among other things, instances of infringements of their rights.

ⓘ More information on the Ethics Line in section *G1-1. Corporate culture and business conduct* of this Report.

S3-1_07

We monitor cases handled by this channel as a means of tracking infringements of the community's human rights, should these arise.

In 2024 no cases of non-compliance with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, or the OECD Guidelines for Multinational Enterprises were identified through the Ethics Line, our main grievance mechanism.

ⓘ More information on the cases handled by the Ethics Line in section *G1-4. Communications received through the Ethics Line* of this Report.

S3-2. Processes for engaging with communities

S3-2_01;
S3-2_02;
S3-2_03;
S3-2_07

At Inditex, we believe that our relationship with and commitment to people in the community is key to properly manage the actual and potential impacts on them.

This allows us to tailor our strategies and more accurately design our community initiatives, in particular the actions pursuant to our community investment strategy, to ensure that our model is optimised to best serve the community's real needs.

Moreover, at Inditex we see respect for human rights as a whole, including indigenous communities in this paradigm. Our relationship with local and international organisations is crucial to our understanding of these communities and the possible impacts of our activity might have on them.

In this line, we highlight the following specific tools of engagement:

/ Commitments to community-based organizations

Given the complexity of establishing a direct relationship with an entire community, our model is based on **collaboration with community representatives**, such as NGOs and other local and international organisations.

By constantly exchanging information, community and stakeholder views are incorporated into the various initiatives. We therefore work with numerous specialist organisations and institutions, like the UNHCR, Red Cross, Médicins Sans Frontières, Water.org or WWF, to carry out these initiatives, from their design to their implementation and subsequent assessment.

In addition, the beneficiaries of the various community investment projects are involved in the assessment phase. Their assessment helps us to gauge the effectiveness of the actions and improve their implementation and scope. We also hold direct contacts with them as part of the specific implementation of projects in communities linked to cotton production.

ⓘ More information on our partnerships with NGOs in section *S3-4. Actions related to communities* of this Report.

/ Social Advisory Board

Our external advisory body on community investment is composed of external and independent persons and institutions, and its main mission is to institutionalise dialogue with key stakeholders from civil society.

/ Sponsorships and Patronage Committee

As the body responsible for the governance in our Community Investment Policy, it is empowered with approving all contributions made under the umbrella of the community investment strategy. Thus, it coordinates with the Community Investment department to assess and approve the necessary initiatives.

/ Projects linked to our Workers at the Centre and raw materials strategies

As part of our Workers at the Centre strategy, we also forge specific partnerships and engagements with organisations that focus on communities linked to our supply chain, and in particular with those communities related to the production of raw materials. One such example is our Public-Private Partnership with the **International Labour Organization**, in place since 2017, to improve respect for Fundamental Principles and Rights at Work in cotton communities, and another is our work with the Organic Cotton Accelerator.

We also harness our sustainability teams to carry out our community engagement actions.

ⓘ More information on stakeholder engagement in section *SBM-2. Interests and views of stakeholders* of this Report.

S3-2_05; S3-2_06

We gauge the effectiveness of our relationship with and commitment to the community by the detailed monitoring of the projects we develop.

When it comes to initiatives carried out within the framework of our community investment strategy, we rigorously measure the outputs and impacts achieved, using, among others, the Business for Societal Impact (B4SI) measurement methodology. In terms of the groups we target, we pay special attention to the **protection of the most vulnerable groups,** such as women, young people at risk of exclusion, LGBTQI+ people, migrants and refugees, among others. We also take into account those communities linked to the production of the raw materials needed for our products, such as cotton.

To learn these groups' views, and to ensure that our strategy is aligned with their needs, we rely on our partnerships with specialised community-based organizations.

S3-2_04

Lastly, operating responsibility regarding stakeholder engagement, in particular with the community, rests with the Chief Sustainability Officer.

S3-3. Processes to remediate negative impacts and channels for affected communities to raise concerns

Processes to remediate negative impacts

S3-3_10

By identifying our potential and/or actual negative impacts, we are able to prevent, mitigate and remedy the effects of their materialisation.

This approach extends to the community. We pay particular attention to developing our due diligence processes and make grievance mechanisms available to all legitimate third parties, so as to act in the best possible way should any negative impact affect them.

Main communication and grievance mechanisms

S3-3_11; S3-3_13; S3-3_15; S3-3_20; S3-3_21

Members of the community have access to our **Ethics Line**, which is available to all our stakeholders. The procedure for handling communications received from the community through this channel and ensuring its efficacy is the same as for those received from other stakeholders, which is outlined in the relevant chapter of this Report.

ⓘ More information on how the Ethics Line works, including monitoring, control and assurance of its effectiveness, in section *G1-1. Corporate culture and business conduct* of this Report.

S3-3_12; S3-3_14

To ensure that members of the community know, trust and can access our Ethics Line, in addition to including information and facilitating access to it via the corporate website, we have designated it as a preferred communication channel in all the policies that apply to it.

S3-3_19

Members of the community can also use the external grievance channels designated by the competent authorities in each case, including the official EU institutions, bodies or agencies.

Moreover, we analyse any other communications we may receive, for example through the organisations we work with in community matters, in order to monitor them and take any necessary action.

S3-4. Actions related to communities

S3.MDR-A_01-12

At Inditex we see **community investment as a chance to contribute to sustainable development** and have a positive impact on the community through voluntary activities that go beyond the boundaries of our value chain and of our industry.

Our approach to corporate community investment

S3-4_03

We aim to bring about a lasting impact in the community, which is why we focus our efforts on supporting long-term strategic projects, subject to an exhaustive monitoring and accountability process, instead of making sporadic contributions to social or environmental causes.

To achieve this, we invest monetary or in-kind resources or hours —such as our people's time spent volunteering— in an array **of non-profit initiatives.**

In this regard, in 2024 we supported 485 organisations (476 in 2023) in carrying out 953 social and environmental projects with an investment of over 134 million euros, a 20% increase on the investment made in 2023. These initiatives, **focusing on the UN Sustainable Development Goals (SDGs)**, that relate to our activity, have directly benefited more than 4.6 million people in 2024, i.e. 6% more than in the previous year.

S3-4_17

The different circumstances of those people are an aspect to which we pay particular attention when developing our actions.

Distribution of the people benefited in 2024 on the basis of their situation	
Living in developing countries	52%
Low income	36%
Refugees	5%
In situation of vulnerability	5%
Other profiles[1]	2%

(1) 'Other profiles' refers to people with a disability, people who are unemployed, victims of a natural disaster or catastrophe or who are homeless, among other circumstances.

Furthermore, we see gender equality as a transversal priority in our strategy. Accordingly, the initiatives we support promote respect for diversity and equality between men and women in all spheres (economic, social, cultural, labour, political, etc.). This approach addresses the root causes of the problem and helps to solve it.

S3-4_18

We also take into account the path outlined by the SDGs when it comes to designing our community partnership projects. We identify the main SDGs to which our initiatives contribute. In 2024, 91% of our contributions were in support of projects aimed mainly at SDGs 3, 4, 5, 8, 10, 12 and 15:

Distribution of Corporate Community Investment in 2024, by SDG	
SDG 3. Good health and well-being	7%
SDG 4. Quality education	5%
SDG 5. Gender equality	4%
SDG 8. Decent work and economic growth	9%
SDG 10. Reduced inequality	31%
SDG 12. Responsible consumption and production	27%
SDG 15. Life on land	8%
Others	9%

In line with our community investment strategy, our efforts in this regard focus mainly on three priority activity areas (education, emergency relief and the environment), which account for 75% of our community investment:

MDR-A_01;
MDR-A_02;
MDR-A_04;
MDR-A_05

/ Education action

Related IROs: [S3.I1; S3.I2; S3.R1]

We support projects focused on safeguarding the community's right to quality education throughout life and generating opportunities for decent work grounded on inclusion and equity in the community.

Key education initiatives in 2024:

- / Inditex Chair of Refugees and Forced Migrants in the Comillas Pontifical University.
- / TEMPE-APSA Chair of Disability and Employability at Miguel Hernández University in Elche.
- / Inditex Chair of Spanish Language and Culture at the University of Dhaka.
- / Inditex Chair of Artificial Intelligence in Green Algorithm at the University of A Coruña (UDC).
- / Inditex Chair of Sustainability at the University of A Coruña (UDC).
- / Inditex Chair of Family-Owned business at the Universities of A Coruña (UDC), Santiago de Compostela (USC) and Vigo (UV).
- / Inditex Chair of Inclusion of Persons with Intellectual Disabilities at the University of Barcelona (UB).
- / Programa CEMS: The Global Alliance in Management Education.
- / for&from: social/workplace integration programme for people with disabilities.
- / GO (Generating Opportunities: education and inclusion for a sustainable world) with Entreculturas.
- / Collaboration programme with Tsinghua University.
- / Collaboration programme with the Massachusetts Institute of Technology (MIT).
- / Collaboration programme with the University of A Coruña (UDC): InTalent, InMotion, Master's Degree in Digital Law and Artificial Intelligence (MUDDIA), Master's Degree in Financial Innovation and Digitisation.
- / Employment and Training Programme in Spain with Caritas.
- / FAD Juventud programme: programme to provide quality employment for women in technology professions in Spain.
- / SALTA: employment integration programme for people at risk or in a situation of social exclusion.

To implement this action, in 2024 we allocated 23 million euros —excluding management costs— which implies 17% of our contribution to community investment actions (17 million euros in 2023).

MDR-A_01;
MDR-A_02;
MDR-A_04;
MDR-A_05

/ Emergency relief action

Related IROs: [S3.I1; S3.I2; S3.R1]

We contribute with initiatives to safeguard the lives, health and well-being of forced migrants and refugees, as well as other vulnerable groups facing humanitarian emergencies such as natural disasters, armed conflicts, etc.

Key emergency relief initiatives in 2024:

- Médecins Sans Frontières (MSF) programme: medical-humanitarian response programme in various parts of the world.
- Relief programme for those affected by the floods in Brazil.
- Relief programme for those affected by the DANA in Spain.
- UNHCR (United Nations High Commissioner for Refugees) Programme.
- Assistance to displaced people in South America with Entreculturas.
- A Flote with the Emalcsa Foundation and the A Coruña City Council: social integration and social benefits programme in Spain.
- Every Mother Counts Programme: programme for the supply of prenatal and maternity care to pregnant women in Bangladesh and the United States.
- Medicus Mundi Programme: programme for the improvement in the well-being of garment workers in Morocco.

To implement this action, in 2024 we allocated 41 million euros —excluding management costs— which implies 31% of our contribution to community investment actions (46 million euros in 2023).

MDR-A_01, MDR-A_02; MDR-A_04; MDR-A_05

/ Environmental action

Related IROs: [S3.I1; S3.I2; S3.R1]

We contribute to activities aimed at conserving and restoring ecosystems, fostering regenerative practices, supporting the circular economy and using resources efficiently.

Key environmental initiatives in 2024:

- Moda Re- with Caritas: programme to generate employment for vulnerable people through the collection, recycling, and reuse of used garments in Spain.
- Water.org programme: programme to improve access to drinking water and sanitation for vulnerable families through microloans in countries such as Bangladesh, Cambodia or India.
- #BRINGYOUROWNBAG (#TRAETUBOLSA) initiative:
  - WWF Programme: restoration and protection projects in forest and freshwater ecosystems.
  - Water & Climate Fund by Water.org: projects to improve water and sanitation infrastructure.
  - Agreement on fire prevention with Galicia Regional Government.
  - Sustainable Forestry and Demonstration Forests with FORESTIS - Associação Florestal de Portugal- and the Galician Forestry Association.
  - Conservation International programme: Regenerative Fund for Nature and Mountains to Mangroves .
  - Regenerative agriculture programme in India in collaboration with ASA, Laudes Foundation, IDH The Sustainable Trade Initiative and WWF India.
  - Royal Botanic Gardens Kew programme.
  - SOS Atlantic Forest Programme.

To implement this action, in 2024 we allocated 35 million euros —excluding management costs— which implies 26% of our contribution to community investment actions (25 million euros in 2023).

ⓘ More information on some of these initiatives in section *E4-3. Actions related to biodiversity and ecosystems* of this Report.

/ Other issues addressed

Related IROs: [S3.I1; S3.I2; S3.R1]

In addition to our initiatives linked to education, emergency relief and environment, we also earmark part of our investment to initiatives linked to social welfare, social and economic development, healthcare, art and culture.

Key social welfare, social and economic development, healthcare, art and culture initiatives in 2024:

- Fundación ProCNIC: collaboration focused on cardiovascular health research.
- Real Instituto Elcano: collaboration focused on research.
- Fundación Carolina: collaboration focused on research.
- Royal Spanish Academy: collaboration focused on art and culture.
- Reina Sofía National Museum of Art: collaboration focused on art and culture.
- Royal Theatre opera house: collaboration focused on art and culture.

To implement this action, in 2024 we allocated 34 million euros —excluding management costs— which implies 25% of the contribution to community investment actions (23 million euros in 2023).

Contributions

MDR-A_06; MDR-A_07; MDR-A_09; MDR-A_10; MDR-A_11; MDR-A_12; S3-4_12

The total contributions allocated to the various community investment actions, including management costs, amounted to 135 million euros (113 in 2023), which were included under Operating Expenses in the Consolidated Income Statement (see *Note 6* to the Consolidated Annual Accounts).

This contribution can be made in various ways:

By form of contribution (€ M)[1]

	2024	2023
Cash (monetary amount)	61.2	62.0
Time (the proportional cost of our employees' paid time spent on social or environmental activities during working hours)	10.6	10.2
In-kind (donations of products, mainly garments)	60.9	38.5
Management costs (estimated expenses incurred for the general management of the programmes)	2.2	2.0

(1) Management costs included

In this regard, in 2024 we increased the value of our in-kind contributions by 58% compared to 2023, through the donation of 7.25 million articles from our collections. Furthermore, our employees have dedicated 353,618 hours of their working hours to social or environmental initiatives, 4% more than in the previous year.

We also classify these contributions into three categories:

By category (€ M)[1]

	2024	2023
Charitable gifts (one-off institutional donations to the general goals of charities)	3.0	2.4
Community investment (long-term strategic commitment to support specific social activities)	87.9	71.7
Commercial initiative in the community (initiatives of social interest directly related to the Company's commercial activity)	41.9	36.6

(1) Management costs excluded

MDR-A_03

It is worth noting that 98% of the total investment in 2024 was channelled to support initiatives that we consider strategic: community investment and commercial initiatives in the community. This is due to our commitment to ongoing initiatives that enable us to maximise the effectiveness of our inputs and broaden the impact of key projects.

MDR-A_02

With regard to the **geographic scope**, we prioritise regular investment in the areas in which we conduct our activity, in particular, in our clusters. Accordingly, our brands and subsidiaries operate locally and/or nationally when it comes to supporting community and environmental projects. This allows us to maximise the positive impact within our communities.

Geographical distribution of corporate community investment in 2024

Europe ex-Spain	17%
Spain	43%
Americas	18%
Asia and rest of the world	23%

Monitoring the positive outcomes of our actions

MDR-A_04; MDR-A_05; S3-4_04; S3-4_16

We carry out an exhaustive monitoring and accountability process in connection with our community investment projects, using B4SI methodology, highlighting the achievements and impacts:

/ IMPACTS

To gauge the effectiveness of the projects we support, we measure the impact of our investments on both the community (direct beneficiaries and community organisations) and the Company (our people and the business).

a) Community

Impact on people[36]

Depth of the impact: which degree of improvement have the people experienced?

*Mutually exclusive parameters.

	Connection [(1)]	Improvement [(2)]	Transformation [(3)]
2024	16%	66%	17%
2023	7%	82%	11%

[(1)] People who have reported some limited change as a result of their participation in the initiative.

[(2)] People who have reported some substantial improvement in their lives as a result of the project.

[(3)] People who have reported an enduring change in their circumstances as a result of the improvements made.

Impact type: what kind of changes have they experienced?

*Non-exclusive parameters. Beneficiaries may experience more than one kind of behaviour.

	Behaviour or attitude change[(1)]	Skills or personal effectiveness[(2)]	Quality-of-life or well-being[(3)]
2024	22%	3%	90%
2023	31%	1%	96%

[(1)] The initiative has helped people make behavioural changes that can improve the person's life. It can also mean that the programme has changed negative attitudes or preconceptions, enabling them to make better decisions.

[(2)] The initiative has helped people to develop new or improve existing abilities to develop academically, in the workplace and socially.

[(3)] The initiative has helped people to be healthier or happier, by improving their physical, emotional or social well-being.

Impact on community-based organisations[37]

		No difference	Low impact	Medium impact	High impact
Improved existing/ delivered new services	2024	0%	3%	32%	66%
	2023	6%	2%	42%	51%
Improved management processes	2024	8%	20%	55%	17%
	2023	12%	7%	63%	18%
Reached more people or spent more time with clients	2024	0%	13%	34%	53%
	2023	8%	16%	53%	23%
Taken on more staff or volunteers	2024	0%	20%	64%	16%
	2023	5%	44%	36%	15%
Increased their profile	2024	0%	0%	53%	47%
	2023	0%	0%	45%	55%

[36] En 2024, the assessment was carried out on 4,521,248 people who benefited from our community investment programme initiatives (4,059,696 in 2023).

[37] In 2024, the assessment was carried out on a total of 319 non-profit organisations benefiting from our community investment initiatives (275 in 2023).

b) Company

Impact on employees[38]

		No difference	Low impact	Medium impact	High impact
Job-related skills[(1)]	2024	1%	3%	26%	71%
	2023	1%	6%	22%	71%
Personal impact[(2)]	2024	1%	2%	14%	84%
	2023	1%	1%	12%	86%
Behaviour change[(3)]	2024	1%	3%	16%	80%
	2023	1%	2%	12%	85%

[(1)] Improvements in core, job-related competencies such as communications, teamwork, leadership skills, etc.
[(2)] Changes in areas like self-confidence, job satisfaction and pride in the company.
[(3)] Changes in behaviour such as increased volunteering or being more vocal advocate of the company.

Impact on our Company

		No difference	Low impact	Medium impact	High impact
Human resources benefits[(1)]	2024	65%	12%	9%	13%
	2023	64%	14%	10%	12%
Improved stakeholder relations/perceptions[(2)]	2024	0%	12%	31%	57%
	2023	0%	15%	28%	57%
Business generated[(3)]	2024	91%	6%	4%	0%
	2023	91%	7%	2%	0%
Other operational improvements[(4)]	2024	40%	14%	12%	34%
	2023	40%	17%	12%	32%
Uplift in brand awareness[(5)]	2024	6%	26%	24%	44%
	2023	7%	22%	21%	50%

[(1)] Improvements in the Company through increased commitment, recruitment or performance linked to the community initiative carried out.
[(2)] Improved perception by external stakeholders based on the community initiative carried out.
[(3)] Increased sales linked to cause-related marketing activities or new market opportunities.
[(4)] Increased resilience of suppliers and/or the distribution chain.
[(5)] Improved brand awareness as a result of increased media coverage, for example.

/ LEVERAGE

Furthermore, it is important to consider **the amount of additional investment leveraged:** the additional resources that our investment programmes have leveraged as a result of contributions by third parties—employees, customers, etc—.

In 2024, this leveraged investment amounted to 210.2 million euros, which represents a 95% increase compared to 2023. This amount was raised mainly through the collaboration with Water.org —through the additional capital released by microfinance institutions—, the Moda Re- project —through the collection of garments— and donations from our employees from their pay checks.

ⓘ More information in the *Methodological Annex* of this Report.

Other community actions

S3-4_01;
S3-4_06

Our community engagement strategy prioritises having a positive impact, as previously outlined, but we also take into account any potential negative impacts on the community from our activity. We do this using a dual approach of **prevention and remediation**, first minimising the possibility of the impact occurring, but also having the necessary mechanisms in place to remedy it if it does occur.

In this regard, we respect the rights of communities when implementing our actions and we extend the scope of programmes like Workers at the Centre with the aim of transferring their effect not only to supply chain workers but to their broader communities. This is especially significant in the communities linked to the production of our raw materials.

[38] In 2024, the assessment was carried out through surveys of 352 employees in 19 countries following their involvement in corporate volunteering initiatives (225 employees in 18 countries in 2023).

More information in section *S2. Workers in the value chain* of this Report.

We take into account impacts indirectly related to the community as well, such as environmental impacts. In this connection, we carry out a number of programmes and initiatives that contribute to respecting communities' right to a healthy environment.

Details of the environmental programmes are provided in chapters *E1. Climate change* , *E2. Pollution*, *E3. Water resources*, *E4. Biodiversity and ecosystems* and *E5. Resource use and circular economy* of this Report.

Further considerations

S3-4_13; S3-4_14

At Inditex, we are mindful that the challenges arising from our global presence are shared, so we **collaborate with all major stakeholders to leverage** our effect and achieve a real and lasting impact. That is why we join forces with NGOs, local and international organisations, companies and brands, and other stakeholders such as academic institutions, media, and civil society itself. And we also work with global industry bodies and initiatives with the aim transforming the sector and addressing shared challenges.

S3-4_05; S3-4_19

Managing impacts, as well as identifying the measures needed to address them, are tasked centralised in our sustainability teams, who are responsible for tackling the challenge of accompaniment and collaboration on the ground. They hold direct contacts with NGOs, local and national authorities, international organisations and academic institutions, among others, to seek common solutions that prevent and mitigate negative impacts and promote positive ones.

Furthermore, the **Ethics Line** allows us to track possible infringements of irregularities, including those linked to human rights, so that we can process the pertinent cases and put into practice the action required.

More information in section *G1-1. Corporate culture and business conduct* of this Report.

The Ethics Committee is tasked with identifying which action is needed to respond to each impact. In this regard, when a communication is received, the Ethics Committee acknowledges receipt and assesses whether it falls within the scope of the Ethics Line. If so, the Ethics Committee conducts an investigation, in collaboration with the relevant areas, and decides whether to close the case (if there is no breach), or to adopt disciplinary and/or additional action. These measures include mitigation measures, such as immediate correction of a breach, and measures to remedy and prevent future breaches.

The Ethics Committee is also tasked with analysing and identifying who best should carry out the relevant actions.

S3-4_02; S3-4_11

In 2024, no negative impacts linked to communities were brought to our attention through the Ethics Line and therefore no remediation measures were carried out. Likewise, no inherently severe incidences of community-related human rights violations have been detected through this channel.

S3-4_07

As for community-related cases received through the Ethics Line, the procedure for managing them and ensuring the effectiveness of the Line is common to that of cases received from other stakeholders, and is detailed in the corresponding chapter of this Report.

More information in section *G1-1. Corporate culture and business conduct* of this Report.

S3-4_10

Furthermore, at Inditex we include communities in our human rights due diligence processes. In addition, we carry out an annual materiality assessment that allows us to identify our points of impact, both positive and negative, and inform our strategy. Thus, we seek to prevent our activity from generating any associated negative effects, especially with regard to the community.

More information on the materiality assessment in sections *SBM-3. Material impacts, risks and opportunities* and *IROs. Disclosures on the materiality assessment process* of this Report.

S3-4_08

The prevention and mitigation actions detailed above help us to prevent fines or penalties being exacted for human rights breaches against communities.

S3-4_09

In turn, no material opportunities have been identified in relation to communities.

Agreements and collaborations

Our agreements and collaborations play a fundamental role in the relationships with the communities around our activities. That is why at Inditex we work closely with the various organisations to mitigate potential negative impacts and have a positive impact on our surroundings. To achieve this we have estable collaboration agreements with a number of organisations, such as Médecins Sans Frontières (MSF), Entreculturas and UNHCR, as well as academic institutions like Tsinghua University and the University of Santiago de Compostela.

ⓘ More information in the report Partnerships, on Inditex's corporate website.

C. Metrics and targets

S3-5. Targets related to communities

S3.MDR-T_01-13

- **To help ten million people through our corporate community investment programme between 2022 and 2025**

In 2022 we committed to help ten million people through our corporate community investment programme between 2022 and 2025. En 2024, we have achieved this target, helping more than 12.3 million people over the last three years.

MDR-T_01

This target is linked to our Sustainability Policy, and more specifically to our Community Investment Policy, which is committed to improving community well-being, maximising the value we generate in the community, and building strategic partnerships to promote sustainable development together.

MDR-T_02;
MDR-T_07;
MDR-T_08;
MDR-T_13

Target: to help ten million people through our Corporate Community Investment programme between 2022 and 2025

	Current year	Target year
	2024	2025
People	12.3 million	10 million

S3-5_04;
S3-5_06

Through this target, we have worked to have a positive and lasting impact on the community by means of our community investment projects, aligned with the Paris Agreement and the Sustainable Development Goals (SDGs) established in the United Nations 2030 Agenda.

MDR-T_11;
S3-5_01

In establishing them, we involve the Social Advisory Board, an external advisory body institutionalising dialogue with key partners from civil society, and our strategic partners in our community investment initiatives, with whom we work to implement our actions.

We have also relied on the continuous dialogue we maintain with all the organisations we work with that routinely inform our decisions and roadmaps.

S3-5_02;
S3-5_03

To gauge the achievement of this target and identify possible improvements, we have involved the various actors in our projects, especially the non-profit organisations with whom we collaborate and the beneficiaries of our actions themselves.

MDR-T_03;
MDR-T_04;
MDR-T_05;
MDR-T_06;
MDR-T_09;
MDR-T_12;
S3-5_05

ⓘ More information on the scope, methodology and calculation changes in the year in the *Methodological Annex* of this Report.

S4. Consumers and end-users

A. Strategy

SBM-3. Material impacts, risks and opportunities

To ensure customer protection and constant improvement in customer satisfaction, it is crucial to understand their needs and concerns. We have therefore identified the material impacts, risks and opportunities linked to our consumers and end-users (hereinafter, consumers or customers).

Material Impacts, Risks and Opportunities related to our consumers

		TYPE (I/R/O)	PHASE OF THE VALUE CHAIN	RELATED POLICIES
S4.I1	**Possible loss of our customers' personal data**	I	/ Customers	**Transversal policies:** / Code of Conduct / Human Rights Policy / Sustainability Policy **Specific policies:** / Compliance Policy regarding Personal Data Protection and Privacy / Information Security Policy
S4.I2	**Possible impacts related to the health and safety of our products**	I	/ Customers	
S4.I3	**Possibility of consumer discrimination**	I	/ Customers	
S4.I4	**Responsible marketing practices and transparency**	I	/ Customers	
S4.R1	**Risks related to consumers' rights**	R	/ Own operations	
S4.O1	**Opportunity to attract new customers through responsible practices**	O	/ Own operations	

ⓘ More information in sections *SBM-3. Material impacts, risks and opportunities* and *IROs. Disclosures on the materiality assessment process* of this Report.

Scope

S4.SBM-3_01; S4.SBM-3_02; S4.SBM-3_03; S4.SBM-3_07

Our materiality assessment takes into account any person acquiring any product sold by the Inditex Group brands, either in physical stores or online, as well as potential customers. We pay special attention to those consumers who require accurate and accessible information on our products and their components, as well as more vulnerable users or those who may be at a greater risk of being hurt, such as children.

We therefore pay special attention to the design of all the products aimed at those users, guaranteeing that they are designed in keeping with their age and needs, so as to protect their well-being.

Occurrence and types of impacts

S4.SBM-3_04

In line with this commitment to our customers, we have mechanisms in place to **prevent** specific negative impacts, such as the loss of personal data, damage related to product health and safety, cases of discrimination or effects on decision making due to a lack of transparency regarding the product. We also have measures to **control** the potential emergence of systemic impacts that might arise due to the various circumstances in the geographies where we operate. These mechanisms also incorporate mitigation and remediation strategies for negative effects once they have occurred, in order to minimise their impact on customers.

Additionally, we are fully committed to the respect and promotion of human rights, rejecting any kind of discrimination. Our Code of Conduct lays down our commitment to responsible marketing and communication, including the obligation to provide clear, truthful and comprehensive information about our products, as well as to ensuring that our items for sale and published content are neither offensive, discriminatory or promote an unhealthy image.

S4.SBM-3_05

Furthermore, we seek to have a **positive impact** on our customers through an accessible and inclusive range of products. For example, we apply universal accessibility principles for our customers with disabilities, in both physical and online stores, with the aim of offering inclusive shopping experiences. In the same way, thanks to our project in conjunction with EqualWeb, our home pages feature digital accessibility menus with voice, browsing, colour and content settings to ensure that these users can properly access all the information. In addition, our customer services are available to all our consumers to resolve any issues that may arise.

ⓘ More information on actions related to consumers in section *S4-4. Actions related to consumers* of this Report.

Risks and opportunities

S4.SBM-3_06;
S4.SBM-3_08

The impacts and dependencies analysis allows us to identify the main risks and opportunities linked to our consumers, verifying that our strategy includes prevention and mitigation actions. For this purpose, we have specialised Customer Services teams who provide customer support, helping to avoid and act on any quality or health and safety issues (among others). In turn, our health and safety efforts, through our teams and the development of associated standards, contributes to ensure that the products we offer to consumers are safe, especially those products aimed at particularly vulnerable consumers, such as children. As a result, not only do we reduce the possible negative impacts on our customers, but we also minimise the risks related to consumer rights.

We have also identified a key opportunity to attract new customers through the implementation of responsible practices. In this connection, we have initiatives such as Zara Pre-Owned through which we foster circularity and attract customers who share these values.

B. Impact, risk and opportunity management

S4-1. Policies related to consumers

S4.MDR-P_01-06;
S4-1_01;
S4-1_08

Our customers are the cornerstone of our business. That is why we establish firm principles through our policies, forming a framework to govern our relationship with people, in a bid to have a positive effect on our surroundings, while mitigating any potential negative impacts.

Policies related to consumers

/ Human Rights Policy ⓘ
/ Sustainability Policy ⓘ
/ Code of Conduct ⓘ
/ Information Security Policy ⓘ
/ Compliance Policy regarding Personal Data Protection and Privacy ⓘ
/ Ethics Line Procedure ⓘ

ⓘ More information on our policies and their updates in section *MDR-P. Policies* of this Report.

Our commitment to our customers is comprehensive and our aim is to offer them products that meet their needs and expectations, guaranteeing high standards of quality, health and safety.

The Sustainability Policy covers customers' concerns and expectations in relation to sustainability, applied to all the products we sell. In this way, we commit ourselves to:

/ **Responsible design** of products, promoting the use of lower-impact raw materials and textile fibres[39].

/ **Ethical and responsible manufacture** of our products, especially regarding the relationship with our manufacturers and suppliers.

/ Complying with the most stringent **health and safety** standards.

Furthermore, our Code of Conduct lays down our commitment to responsible marketing and communication, including the obligation to provide accurate, clear and comprehensive information about our products and their characteristics, and to ensure that the products we sell and our published content are not offensive, discriminatory or promote an unhealthy image.

MDR-P_01; MDR-P_02; MDR-P_03; MDR-P_04

We also consider it paramount to guarantee information security, particularly in connection with our customers' data and privacy. We are, therefore, aware of the potential cybersecurity risks that may emerge as we conduct our operations, and we work accordingly to involve our entire workforce in preventing and mitigating them, thereby protecting all our stakeholders.

Our Information Security Policy and Compliance Policy regarding Personal Data Protection and Privacy establish our action principles in this sphere.

Information Security Policy

Approved by the Board of Directors on 10 December 2019

Key contents	/ Principles and guidelines whereby the Group protects its information and the information shared with third parties, regardless of how it is communicated, shared, projected or stored / To ensure the necessary confidentiality, maintaining the integrity and ensuring the availability of the information handled by the Group
Scope	/ The entire Group (companies and individuals) / Other natural or legal persons linked to Inditex, when possible due to the nature of the relationship and when conducive to compliance
Accountable for the implementation	/ Information Security department and its chief officer
Third-party standards	/ Payment Card Industry-Data Security Standard 4.0 (PCI-DSS) / ISO/IEC 27001:2022 / Korean Information Security Management System (K-ISMS) / Multi-Layer Protection Scheme (MLPS)

Compliance Policy regarding Personal Data Protection and Privacy

Approved by the Board of Directors on 11 June 2019

Key contents	/ Establishment and standardisation of the degree of compliance by Inditex companies with the standards and best practices that most strongly guarantee personal data protection and privacy / Principles and commitments in the processing of personal data under the Group's control
Scope	/ The entire Group (companies and individuals) / Other natural or legal persons linked to Inditex, when possible due to the nature of the relationship and when conducive to compliance
Accountable for the implementation	/ Personal Data Protection and Privacy department and its officer
Third-party standards	/ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data

S4-1_03

Commitment to respect our customers' human rights

At Inditex we endeavour to guarantee that the human rights of everyone around us, including our customers, are upheld. We therefore reject any form of discrimination, always respecting our customers' right to privacy, which we duly protect, and making a properly use of their personal data.

[39] More information on the criteria that fibres or materials must meet to be classified as having a lower impact in the *Methodological Annex* of this Report

The health and safety of our customers are also paramount for the Group, which is why we undertake to make products in an ethical and responsible way, in keeping with our health and safety standards.

S4-1_02; S4-1_06

In this regard, our Sustainability Policy, and in more detail in our Human Rights Policy, inspired by the leading international declarations on human rights, enshrine our commitment to our consumers' rights.

ⓘ More information in section *MDR-P. Policies* in this Report.

S4-1_04; S4-1_05

One of our foremost tools for customer engagement and dialogue are our **customer service mechanisms**, which establish a direct avenue of communication for any issue or query that may arise, allowing us to detect and act to address potential breaches. Our customers can also access the official grievance mechanisms in place in each market.

This set of mechanisms, described in more detail in the following sections of this Report, offers a range of methods to address any query or complaint in connection with their rights or other matters of interest to them.

S4-1_07

Accordingly, in 2024 no breaches of the United Nations Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, or the OECD Guidelines for Multinational Enterprises have been identified through the Ethics Line, our main complaint mechanism.

ⓘ More information on the Ethics Line in section *G1-1. Corporate culture and business conduct* of this Report.

S4-2. Processes for engaging with consumers about impacts

S4-2_01; S4-2_02

We have various mechanisms of relationship and dialogue with our customers, allowing us to listen to their perspectives and take them into account in making decisions to properly manage the actual and potential impacts on them. In this connection, we highlight:

/ Specialised customer service teams
Our brands' specialised customer service teams are among the main channels for engaging with consumers, primarily at the operating level. These areas handle customer contacts —calls, e-mails, *WhatsApp* messages or messages on social media profiles— concerning questions on products, the purchasing process, shipments, incidents or any current issues affecting the brands, among others.

/ Store teams
Inditex implements a flexible business model based on multi-concept omni-channelling and the integration of retail space: stores and online. This allows us to generate a differentiated shopping experience, tailored to our customers' needs at the right time and place.

To fulfil this commitment to our customers' experience, the work of our physical and online store teams is crucial, as they form the first line of direct contact with consumers. In particular, our physical store teams communicate daily with the people who visit our establishments, directly handling their queries or informing them about the other available customer care and complaints mechanisms as and when they require them.

In this regard, we promote initiatives such as **Customer Experience (CX)**, in which store managers lead the change, analyse the feedback they receive from customers and develop their teams' skills to offer the best possible customer care. At the same time, the continuous improvement of our customer relations from an innovation standpoint led us to launch **Big Store**, a project in which our store teams carry out digital tasks relating to the business.

/ Communication channels: websites, *app* and social media
Our digital channels enable us to interact with our customers in more than 200 markets. Not only do these channels showcase our collections, but they allow us to convey our principles in the content we generate on our platforms, fulfilling our commitment to responsible marketing practices.

We are mindful of the impact of our products and the image they transmit. That is why we want our campaigns, and the image of the models who appear on them to convey a diverse, multicultural and positive reality that celebrates the product by presenting it in a detailed way that is faithful to its properties and qualities.

/ Ethics Line

The Ethics Line, as the main grievance mechanism available to our stakeholders, is one of the communication channels for our customers to convey their concerns and raise questions about the Code of Conduct and other Group internal regulations, as well as to report to us, including anonymously, any breaches or actions contrary to the regulations or to any applicable law.

ⓘ More information on the Ethics Line in section *G1-1. Corporate culture and business conduct* of this Report.

S4-2_03

Our ongoing relationship with our customers takes place before, during and after the purchase process, through the various channels mentioned above. This interaction is initiated both at the customer's behest, when they need to raise a query or file a complaint, and by the Company, as it provides regular information on its product range and services.

Through these actions, we seek to understand their perspectives and concerns, which we take into account as we design our strategy. This applies not only in terms of our products, but also when it comes to preventing and mitigating impacts, and evaluating the effectiveness of the measures and their subsequent renewal or updating.

S4-2_06

Throughout the entire process, it should be noted that special consideration is given to the views and impacts of consumers who may be particularly vulnerable. For instance, continuous dialogue with different partner organisations allows us to exchange views and integrate their perspective into the Company's day-to-day operations.

ⓘ More information on some of the organisations we work with in the *Diversity and Inclusion report*, published on Inditex corporate website.

S4-2_05

Moreover, at Inditex we measure the effectiveness of our customer services by following up on our interactions in detail. This allows us to gauge whether the communication is efficient, and determine whether our customer services are aligned with their needs.

In this effectiveness analysis, we highlight the work of our teams, who implement their own contact monitoring plans for each of the brands. These plans allow us to examine a range of valuable metrics to assess the efficacy of the service, such as first call resolution or the number of repeat contacts.

S4-2_04

The Customer Experience manager of each of our retail concepts is ultimately responsible for overseeing these services.

ⓘ More information on how our customer service resources work in section *S4-3. Processes to remediate negative impacts and channels for consumers to raise concerns* of this Report.

S4-3. Processes to remediate negative impacts and channels for consumers to raise concerns

S4-3_01;
S4-3_02

We identify our potential and actual impacts in order to prevent, mitigate and remediate their effects. This understanding applies to all our stakeholders, including our customers.

Depending on the nature of the impact, we have three preferred channels to manage issues or concerns raised by our customers: customer service teams and channels, official grievance mechanisms and the Ethics Line.

S4-3_04;
S4-3_05;
S4-3_06;
S4-3_13

Through these three preferred contact avenues, detailed in section S4-2 of this Report, we receive communications from our customers and identify and implement remediation and mitigation plans that minimise negative effects arising from impacts. At the same time, we work to prevent them and to avoid their recurrence in the future. Thus, we guarantee the protection of our customers' rights.

Response to our customers

With regard to the communications received through the **customer service channels**, at the operating level, our aim is to ensure the quality and efficacy of the service offered. Consequently, our customer service agents have access to a specific training platform that contains all the procedures and manuals. To guarantee the effectiveness of the channel and with the aim of effecting continuous improvement of the service, we conduct monthly controls of customer interactions with our brands, to monitor the quality of the customer care provided.

In 2024 the customer service areas of the Group's brands fielded a total of 45,913,444 customer contacts (calls, e-mails, *WhatsApp* conversations and messages via social media profiles), concerning questions on products, the purchasing process, shipments, incidents or current issues affecting the brands, among other matters (46,446,384 contacts in 2023).

In this regard, the progression of online sales has shifted the weight of customer contacts according to the purchase channel, so that enquiries about order status, delivery times or the *online* operation itself make up a very significant part of the total.

Regarding the service level, understood as the percentage of contacts resolved over the total, in 2024 it was 97% (98% in 2023).

In 2024, the quality of customer services at five Inditex brands —Pull&Bear, Massimo Dutti, Bershka, Oysho and Zara Home — renewed its certification under the ISO 18295:2 international standard. This certification underpins the customer service strategy throughout their shopping experience and interaction with each brand, the operations and protocols for looking after customers through the various contact channels, as well as the standards of service quality and satisfaction of our customers.

Types of cases handled

In the relationship with the customer, our teams field a range of queries related to our products and the purchase process. Each brand independently sorts the reasons for customer contacts, according to their specific needs, although these reasons can be grouped into four broad areas:

/ **Pre-purchase:** issues prior to the purchase.

/ **Post-purchase:** related to an order or purchase at a store.

/ **Customer service:** relating to the contact channels, website and app.

/ **Complaints and claims.**

In 2024, our brands handled 44.5 million cases through Customer Services in all the markets where we have a commercial presence (45.4 million in 2023). Of these, the categorised cases are classified as follows:

Type of cases handled	2024	2023
Pre-purchase (product availability, special collections, customisation, purchasing process, checkout and sustainability, among others)	26%	20%
Post-purchase (order status, shipments, delivery times, changes and returns, gift cards, among others)	70%	76%
Customer Service (customer account, web/app, channels, social media, among others)	5%	4%
Complaints (includes any customer feedback, as well as formal complaints)	0.02%	0.02%

The complaints figure includes complaint forms and claim procedures in Spain processed through official consumer complaint and response mechanisms, which in 2024 totalled 6,924 (5,840 cases processed in Spain in 2023). The main reason for these complaint forms is related to product returns and exchanges, and store and online sales.

With regard to cases received from customers through the Ethics Line, the procedure for handling them and ensuring the channel's efficacy is the same as for those received from other stakeholders, and is outlined in the relevant chapter of this Report.

S4-3_03;
S4-3_09;
S4-3_10

Our customer service channels can be accessed via all our online store websites and apps. Likewise, the physical store teams pass on information about customer service and other formal complaints mechanisms as and when necessary.

Likewise, everyone, including consumers, can access the Ethics Line continuously via our corporate website. In addition, external reporting channels designated by the competent authorities may also be used, including the institutions, bodies or agencies of the European Union.

ⓘ More information in section *S4-2. Processes for engaging with consumers about impacts* of this Report.

S4-3_11;
S4-3_12

In handling customer complaints and concerns, we maintain the utmost respect for **confidentiality, privacy and data protection**. In the specific case of our customer service channels, customers only need to provide contact information when their query is related to an order or when it requires subsequent follow-up or action by our customer service team. Other communications may be made anonymously.

To facilitate the implementation of our privacy programme, we carry out various transversal projects, such as removing or blocking any sensitive information provided by customers as a security measure, and other measures aimed at improving their shopping experience.

Furthermore, concerns about compliance received via the Ethics Line may be made anonymously.

ⓘ More information on the workings of the Ethics Line, including follow-up, control and ensuring its efficacy in section *G1-1. Corporate culture and business conduct* of this Report.

S4-4. Actions related to consumers

S4.MDR-A_01-12;
S4-4_01;
S4-4_02;
S4-4_04;
S4-4_07;
S4-4_08;
S4-4_10;
S4-4_12

The actions we carry out were designed to manage our impacts, risks and opportunities, whether actual or potential. For this purpose we continuously carry out initiatives to ensure the protection and care of our consumers and aim to prevent the occurrence of negative impacts, and, should these arise, remediate their effects. We therefore do everything we can, and allocate the necessary resources, to properly manage these impacts. We also carry out the necessary follow up through related metrics.

S4-4_05;
S4-4_06

Against this backdrop, we take a dual approach of **prevention and mitigation**, responding to the negative impact and at the same time minimising the chances of its occurring in the future. We underscore our efforts to ensure the protection of our consumers' data, the accessibility and inclusion of all our customers, regardless of their specific characteristics, and our special health and safety protection measures, both in our stores and relating to our products.

Accordingly, we have standards, training plans and prevention and control programmes focused on preventing, mitigating and remedying any impact on our customers' health and safety. Likewise, our product health and safety teams are coordinated with all areas of the Company to ensure an adapted response to any notification of an incident from customers, community organisations or supervisory bodies, carrying out technical assessments and following up. If we find indications that a product might not be safe, it is withdrawn and our internal procedure is activated to communicate the situation and recall any units sold.

Our communication channels are the main source of key information to guide our strategies and actions relating to customers. In particular, we highlight the work of our store and customer service teams who, through their direct and constant relationship with consumers, pinpoint their priority needs. This ensures that our strategy is adapted to our broader reality.

S4-4_11

Furthermore, the Ethics Line allows us to track possible human rights infringements or irregularities, so that we can process the pertinent cases and promote the action required. Among the cases reported through the Ethics Line in 2024, no inherently severe incidents linked to customers' human rights have been revealed.

ⓘ More information in section *G1-1. Corporate culture and business conduct* of this Report.

In addition to responding to negative impacts, at Inditex we endeavour to have a **positive impact** on our customers. Our Customer Experience initiative takes a customer-centric approach, aiming for a constant improvement of their experience with Inditex.

S4-4_03; S4-4_16

In this vein, we offer our consumers quality and safe products, which they can access in an inclusive way, with a personal and careful service experience, and having privacy guaranteed.

S4-4_17

Hence, when designing our customer actions, we consider the path outlined by the UN Sustainable Development Goals (SDGs), with a focus on contributing to achieving the goals defined. In 2024 our initiatives have contributed mainly to SDG 12, focusing on sustainable consumption and production patterns.

S4-4_13

At Inditex, we are mindful that the challenges posed by having global operations are shared, so we **collaborate** to leverage our effect and achieve a real and lasting impact. That is why we share our goals with suppliers, manufacturers, companies and brands, and other stakeholders such as NGOs, trade unions and local and international organisations. And we also work with global industry bodies and initiatives with the aim of achieving widespread adoption of sustainable practices across the sector.

S4-4_09

The possibility of attracting new customers by implementing responsible practices that are aligned with their interests and concerns is one of the **opportunities** we have identified. However, our actions that contribute to this opportunity are not designed to attract new customers, but are aligned with our understanding of sustainability as a responsibility and driver of our Company's strategy. These actions are detailed throughout the other chapters of this Report, mainly in standards E1, E2, E3, E4, E5, S2 and G1.

Health and safety actions

Related IROs: [S4.I2; S4.I4; S4.R1; S4.O1]

/ Health and safety initiative

MDR-A_01; MDR-A_02; MDR-A_03

The health and safety of our products is paramount to Inditex. Accordingly, we have standards, training plans and prevention and control programmes devised to ensure that our products comply with the strictest requirements and guidelines in all the markets where we operate.

We have product-specific generally applicable and mandatory standards for all the articles we sell[40], covering processes from design to manufacturing. We currently have eight product standards, each with a different scope:

Product standards

	Scope
Safe to Wear	Garments, children's footwear, accessories, including trimmings and fabrics used in their manufacture
Clear to Wear	Garments, fabrics, footwear, accessories and home textiles
Physical Testing Requirements	Garments, footwear, accessories and home textiles
Active to Wear	Garments and fabrics
i+Cosmetics	Cosmetics
i+Food Contact Materials	Products in contact with food
i+Home Fragrance and Candles	Home fragrances, candles and their accessories.
i+Child Care Furniture	Childcare furniture

[40] Articles that are outside the scope of Inditex's health and safety standards are subject to minimum requirement reports specifically compiled in accordance with the legal requirements that apply to the type of product and the markets where they are sold.

As indicated in the chapter on pollution, we work with technology companies, research centres and laboratories of international reference, as well as implementing our own programmes, to ensure that our products meet the Company's own standards.

ⓘ More information in sections *E2-1. Policies related to pollution* and *E2-2. Actions related to pollution* of this Report.

In particular, to strengthen compliance with our **Safe to Wear** safety standard, we provide our suppliers with manufacturing guidelines that include measurement tables with specific safety requirements, such as the position of appliqués and cords or maximum lengths of free ends.

Additionally, in line with our commitment to offer safe products, our product health and safety teams are fully coordinated with customer service teams on stores and any other area of the Company where information about incidents and/or complaints may be received.

At the same time, any notification from our customers, from community organisations or supervisory bodies is forwarded to our technical experts for evaluation and follow-up. If there are signs that a product may be unsafe for consumers, it is withdrawn from the market, customers are notified through the relevant channels and all units sold are recalled, according to our internal procedure.

MDR-A_04; MDR-A_05

To verify compliance with our health and safety standards, we use our **Picking** inspections programme. This programme allows us to verify that our products comply, among others, with our Safe to Wear (StW) and Physical Testing Requirements (PTR). Specifically, the programme's results in 2024 show an initial degree of compliance by our textile articles of 99.7% for StW and 99.3% for PTR (99.6% and 99.3%, respectively, in 2023).

ⓘ More information on the Picking programme can be found in section *E2-2. Actions related to pollution* of this Report.

Data protection and privacy actions

Related IROs: [S4.I1; S4.R1]

In 2024, we have worked in advocating the value of respect for privacy and ensuring an appropriate level of compliance with data protection and privacy regulations. Our compliance model in connection with data protection and privacy is based on:

/ Accompanying the business areas and providing risk-based advice.

/ Continuous improvement of the privacy programme and implementation of tools that strengthen the accountability system, accrediting compliance with the model.

/ Monitoring by the Group's global Data Protection Officer (DPO) through our privacy control system.

/ Annual report to the Board of Directors through the Audit and Compliance Committee and to the Company's Management through the participation in the Information Security Committee, when necessary.

Throughout this year, the Personal Data Protection and Privacy department has continued **advising the business and technology areas** in the projects they launched over the course of the year to ensure they are compliant with privacy requirements from the outset (privacy by design). Specifically, 65 projects involving the processing of customers' data were analysed.

In addition, in 2024 we carried out a work to **monitor regulations and adaptation projects in subsidiaries**, keeping track of new data protection regulations and modifications thereto so as to ensure an adequate level of compliance. We conducted an exercise to adapt to data protection and privacy regulations in markets such as Canada, Japan and Türkiye with the aim, not only of guaranteeing compliance, but adapting our corporate compliance model to local specificities.

MDR-A_01; MDR-A_02; MDR-A_03

With regard to training in connection with data protection and privacy, we continue to work on the promotion of the privacy culture at the Company through the **'privacy' course**, which is mandatory for all office teams who process personal data of different stakeholders. Since its launch in February 2024, 97% of the staff required to take this course have completed it.

Likewise, based on their greater exposure to privacy risks, we have carried out the following actions focused on other priority groups:

/ We have collaborated with the Compliance department in specific training for the People department on the privacy aspects of the Code of Conduct.

/ We have continued to train our **Privacy Delegates**, our liaisons who help coordinate and manage data protection and privacy issues in each of the subsidiaries. In this regard, in 2024 we trained Privacy Delegates for 18 markets.

ⓘ More information can be found in the section *G1-3. Prevention and detection of corruption and bribery* of this Report

In order to guarantee the data protection of the groups whose personal data we process (customers, employees, candidates, etc.), we conduct an analysis of all the trends with an impact on privacy across our sector, as well as the obligations entailed by the new regulations and the interpretations of the supervisory authorities, judges and courts. This guarantees seamless compliance with the principles deriving from the data protection and privacy regulations.

MDR-A_04; MDR-A_05

In turn, we have worked on cases that could potentially affect customers' personal data in order to determine whether a security breach had occurred and, if so, whether it was necessary to notify the data protection authorities and/or the affected persons. Over the course of the year, four cases affecting personal data security occurred where the Company deemed it necessary to notify the data protection authorities, and one case in which the affected persons were also informed of their situation. All these were minor incidents and, to date, no additional information has been requested by the authorities. In any event, the necessary action plans have been put in place internally to avoid a recurrence in the future.

MDR-A_06; MDR-A_07

The actions carried out in relation to our costumers are carried out primarily by our people. The financial resources earmarked for these actions are associated with staff costs and other external operating expenses, which separately do not represent a material amount. Both are included in Operating Expenses in the Consolidated Income Statement (see *Note 6* of the Consolidated Annual Accounts).

Other initiatives

In addition to these actions, we carry out other initiatives linked to accessibility measures for customers with disabilities. Hence, stores meet architectural accessibility standards to enable people with disabilities to access and move around the stores and to ensure they have a satisfactory shopping experience.

With regard to digital accessibility, and thus our brands' websites and apps, as well as our recruitment and professional development platforms, Inditex Careers and InTalent, include specific functionalities to improve access for users with disabilities. Our websites are compliant with the General Accessible Design Principles established by the Web Accessibility Initiative (WAI), a part of the World Wide Web Consortium (W3C). In addition, thanks to the project in conjunction with EqualWeb, their home pages feature digital accessibility menus with voice, browsing, colour and content settings to ensure a more inclusive user experience.

Agreements and collaborations

Through collaborations and agreements with specialised organisations such as Open to All, ENAR and REDI, we work to raise awareness concerning the needs of vulnerable groups and take the necessary measures to ensure that our stores are spaces where everyone feels welcome. In the United States, in 2022 we also signed the Mitigate Racial Bias in Retail Charter, which advocates for actions to eliminate racial bias in shopping experiences. Furthermore, in the European Union, 13 of our subsidiaries have signed the Diversity Charter, a public commitment to create inclusive spaces that are free of discrimination, and to promote diversity and equal opportunities for their staff and customers.

This type of collaboration and partnerships are aimed at improving the customer experience by adopting inclusive policies that generate more respectful and inclusive environments for everyone entering our stores, regardless of their personal characteristics.

C. Metrics and targets

S4-5. Targets related to consumers

S4.MDR-T_14-19; MDR-T_20; MDR-T_21

At this stage we do not have specific targets linked to our customers. However, we are working on the global ambition of improving our consumers' experience, minimising negative impacts and maximising the positive ones. We do this through the commitments enshrined in our policies, as well as the initiatives we carry out during the year. An example of this is our target of including new circularity services in our markets, in keeping with our Sustainability Policy highlighting the development of our **Zara Pre-Owned** platform.

ⓘ More information in section *E5-3. Targets related to resource use and circular economy* of this Report.

7. Governance information

[ESRS G]

G1. Business conduct

Additional information. Cybersecurity

Additional information. Responsible risk management

Additional information. Tax responsibility and transparency


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G1. Business conduct

IRO-1. Material impacts, risks and opportunities

As a result of our analysis, we identified material impacts, risks and opportunities related to business conduct.

Material Impacts, Risks and Opportunities related to business conduct

		TYPE (I/R/O)	PHASE OF THE VALUE CHAIN [1]	RELATED POLICIES
G1.I1	**Possibility of ineffectiveness of the grievance mechanisms**	I	/ Own operations / Extended value chain	**Transversal Policies:** / Code of Conduct / Code of Conduct for Manufacturers and Suppliers / Human Rights Policy / Sustainability Policy / Sustainability Stakeholder Relations Policy **Specific Policies:** / Compliance Policy / Due Diligence Policy / Policy on Public Policy / Policy on Donations and Sponsorships / Gifts & Invitations Policy / Policy on Dealings with Public Servants / Anti-Money Laundering and Terrorist Financing Policy / Conflicts of Interest Policy / Criminal Risk Prevention Policy / Global Policy on Internal Reporting Channels / Ethics Line Procedure
G1.I2	**Promotion of regulatory development and industry improvement**	I	/ Own operations / Value chain	
G1.I3	**Possibility of corruption, fraud, bribery and other unlawful acts**	I	/ Own operations	
G1.I4	**Supplier relations management and responsible purchasing practices**	I	/ Value chain	
G1.R1	**Risks arising from the relationship with key suppliers**	R	/ Value chain	
G1.R2	**Cybersecurity risks**	R	/ Own operations	

[1] The extended value chain comprises the environment and the communities in which we are present even if they are not directly linked to our activity.

ⓘ More information in sections *SBM-3. Material impacts, risks and opportunities* and *IROs. Disclosures on the materiality assessment process* of this Report.

A. Corporate ethical culture and solid compliance architecture

GOV-1. The role of the governing bodies

G1.GOV-1_01

Strategy and governance

The Board of Directors defines and approves the ethical commitments reflected in the Codes of Conduct and ensures compliance with them.

The Audit and Compliance Committee is tasked with a series of competencies in connection with risk management and business conduct, which includes the supervision of the Compliance function. On a quarterly basis throughout the year, and whenever requested, the Compliance function provides the Audit and Compliance Committee with:

/ the annual and half-yearly reports by the Ethics Committee on its activity, the functioning of the **Ethics Line** and the overseeing of the **Model of Criminal Risk Prevention**;

/ the periodic reports from the Chief Compliance Officer on the functioning of the **Global Compliance Model**, compliance **risk management,** the status of the cases processed by the Ethics Committee and the main **compliance projects and initiatives** (including training and awareness-raising), the **Annual work plan**, the annual budget and the means and resources available to the Compliance function; and

/ the **internal rules** that are submitted to the Board of Directors for approval or amendment, subject to a report from the Board Committee with competence in this area.

In view of these reports, the Audit and Compliance Committee may raise questions, draw conclusions and make proposals for measures aimed at improving the functioning of the Global Compliance Model. The Committee in turn reports to the Board of Directors on these matters.

The Compliance function is corporate and coordinates all areas with compliance responsibilities within the Inditex Group. It is made up of:

/ The **Ethics Committee** is the internal body responsible for overseeing compliance with the Codes of Conduct and the Model of Criminal Risk Prevention. It is responsible for the Internal Reporting System and for managing the Ethics Line. It is made up of six members appointed by the Board of Directors on 15 March 2022 and 3 May 2023, following a report from the Audit and Compliance Committee. Its Regulations, approved by the Board of Directors, regulate its functioning and powers. This Committee submits regular reports to the Audit and Compliance Committee on matters within its competence.

/ The **General Counsel's Office - Compliance** (hereinafter, the **Compliance department**): it is tasked with the operating management of the Global Compliance Model and, in particular, the Model of Criminal Risk Prevention and other models for the prevention of corruption and other offences. The Chief Compliance Officer, who is also a member of the aforementioned Ethics Committee, reports periodically to the Audit and Compliance Committee on the activity of the Compliance function, the functioning of the Global Compliance Model, compliance risk management, annual work plans and the means necessary to carry them out. The Compliance department is made up of 12 professionals, has the support of more than 70 Compliance Delegates and an annual budget, at headquarters and subsidiaries.

The independence of the Compliance function is guaranteed by the appointment of the members of the Ethics Committee and the approval of its Regulations by the Board of Directors and by the direct liaising of the Chief Compliance Officer with the Audit and Compliance Committee, ensuring that the ultimate control of the Model's efficiency depends exclusively on the Board of Directors.

The governing, management and supervisory bodies of the Global Compliance Model are detailed below:

Governance, management and supervisory structure of the Global Compliance Model

Board of Directors

Audit and Compliance Committee

/ Assessment of the effectiveness of internal financial and non-financial risk management and control systems

/ Identification of the most significant financial and non-financial risks

/ Monitoring compliance and effectiveness of compliance policies and procedures

Ethics Committee

Decision-making body

Its composition, operation and competencies are provided for in its Regulations, as approved by the Board of Directors

Responsibilities:

/ Overseeing compliance with the Codes of Conduct

/ Overseeing the Model of Criminal Risk Prevention

/ Ethics Line management

/ Responsible for the Internal Reporting System

Comprised of:

/ General Counsel and Secretary of the Board of Directors

/ Chief Compliance Officer

/ Chief People Officer

/ Chief Audit Officer

/ Chief Sustainability Officer

/ Ethics Line Manager

General Counsel's Office - Compliance

Operational management

Responsibilities:

/ Organisation and coordination of internal regulation

/ Liaising with different departments entrusted with Compliance duties

/ Periodic reporting by departments with Compliance functions

/ Periodic reporting to the Ethics Committee and the Audit and Compliance Committee (on activity, work plans, budget and resources)

Comprised of:

/ General Counsel and Secretary of the Board of Directors

/ Chief Compliance Officer

/ Ethics Line Manager

/ Rest of the Compliance department

G1.GOV-1_02

To ensure that the Board of Directors and its respective Committees, which have competencies relating to business conduct, have a suitable composition that allows them to properly discharge their duties, the **Company has a Diversity of Board of Directors Membership and Director Selection Policy**, approved by the Board of Directors.

Likewise, the Audit and Compliance Committee Regulations establish that the members of the Committee must be appointed on the basis of their knowledge and experience in, among other areas, financial and non-financial risk management, as well as their relevant technical expertise in relation to the Company's sector of activity.

The Nomination Committee understands that, generally speaking, to properly carry out its oversight duties, members of the Board of Directors must, as a whole, be of recognised solvency, competence, experience and merit: (i) in the Company, Group and retail sector; (ii) in economics and finance, as well as in accounting, auditing and risk management; (iii) in regulatory compliance and corporate governance; (iv) in the digital and new technologies sector; (v) in sustainability; (vi) in different geographical markets; and (vii) in business management, leadership and strategy.

ⓘ More information in section *GOV-1. The role of the governing bodies* of this Report.

Currently, 40% Board members have prior experience in compliance and corporate governance matters and 60% have experience relating to enterprise risk management.

ⓘ More information on the Board Skills Matrix in the 'Investors' section of 'Corporate Governance - Board of Directors' of our corporate website.

G1-1. Corporate culture and business conduct

G1-1_01

The ethical culture of the Inditex Group is based on the premise that '**the how matters**'. We believe that value comes from how we do things and that the journey is more important than the destination. We do not understand success without the ethical commitments and action principles that drive us.

Our ethical commitments and the action principles that should guide our day-to-day activities are set out in our Codes of Conduct and developed upon further in other internal rules. To promote knowledge of and compliance with these rules, they are published internally and/or externally and awareness-raising or training initiatives are carried out and adapted to the profile of the people who should know them and apply them in their work.

Global Compliance Model

Our corporate ethical culture is integrated and implemented in all our operations through the Global Compliance Model. Its purpose is to ensure compliance with the law and the ethical commitments undertaken by the Inditex Group, and to protect the Company and the interests of our stakeholders, preventing or limiting any type of legal liability.

The Model is made up of fundamental corporate and high-level elements, that are developed upon in various internal rules, among which our Codes of Conduct, described in the section *MDR-P. Policies*, stand out.

The key elements of the **Global Compliance Model**:

/ Governance, management and supervisory structure of the Global Compliance Model

/ Codes of Conduct

/ Ethics Line

/ Disciplinary system

/ Compliance training plan

/ Due diligence

/ Compliance Policy

/ Policy for Representatives and Attorneys of Companies within the Inditex Group

/ Internal Audit function

ⓘ More information in section *MDR-P. Policies* of this Report, and in the 'Ethical Commitment' section of our corporate website.

In 2024, we also continued with the adaptation of the Ethics Line to the various transpositions of the Whistleblowing Directive, drew up a corporate taxonomy of compliance risks, reviewed the methodology for assessing these risks and continued with the integration of the Model of Criminal Risk Prevention and the existing local models into the Global Compliance Model.

ⓘ More information on the policies and their update in section *MDR-P. Policies* of this Report.

Model of Criminal Risk Prevention

As part of the Global Compliance Model, Inditex relies on a Model of Criminal Risk Prevention to prevent the commission of offences under Spain's Criminal Code, among them corruption, fraud and bribery. The Model was approved by the Board of Directors in 2012 and revised in depth on 19 July 2016. It is continuously updated, evaluated and improved to ensure it is in line with the Group's operations, legal requirements and recommendations and best practices in this area, as well as to ensure its implementation and effectiveness.

Composition of the **Model of Criminal Risk Prevention**

- **Policy:** it describes the Model and details criminal risks to which the Group is potentially exposed due to its operations, in accordance with Spanish law and the Internal Regulations containing guidelines for conduct to prevent these risks.
- **Procedure:** it establishes the organisational measures; the roles and responsibilities in the field of control, verification and reporting of the Model, and the Ethics Committee's functions in this field.
- **Risk and Control Matrix** (hereinafter, the Matrix): this is a catalogue of criminal risks to which the Group is inherently exposed, including corruption risks, and an inventory of controls defined for mitigating such risks, allocating the frequency and the department responsible for their execution. It is continuously reviewed and updated in accordance with applicable law and Group operations. The risks are assessed annually based on their impact and likelihood of occurrence. Controls are monitored on a regular basis, with the support of external auditors. With the information obtained in the process of assessing and of overseeing the controls, priority criminal risks are identified.

The Criminal Risk Prevention Policy and the Matrix were reviewed in 2024. A risk assessment and monitoring of the controls of the Matrix has been carried out, taking into account the prioritisation of the risks they mitigate, in accordance with the previous year's assessment.

Our overseeing of the Model of Criminal Risk Prevention carried out in 2024 had the support of external consultants in reviewing the evidence of the execution of the Matrix controls, which was provided by the responsible departments during the monitoring process. We also received external expert advice when reviewing the taxonomy of compliance risks and the methodology for assessing criminal risks. In both cases, professional services firms independent of the Company's auditors were hired.

Since its review in 2016, this Model has been audited by an independent third party on several occasions, with a reasonable assurance review scope, in order to confirm the effectiveness and proper functioning of the controls contained in the Risk and Control Matrix, as well as the Model's adequacy in terms of the requirements set out in sections 2 and 5 of article 31 bis of the Criminal Code, the UNE-ISO 19600 Compliance Management Systems standard, and in keeping with the guidelines of COSO in its report 'Internal Control – Integrated Framework' (2013). The audit report was unqualified in all cases. The last of these audits was carried out in the financial year 2021, the report of which was presented to the Audit and Compliance Committee at its meeting on 15 March 2022.

The main anti-corruption risks to which the Group is inherently exposed due to its activity, in accordance with the applicable legislation, are identified in the Matrix, and are as follows: prevention of corruption in business, prevention of corruption in international transactions, prevention of bribery and prevention of influence peddling.

In addition to the fundamental elements of the Global Compliance Model mentioned above, there are specific controls to mitigate corruption, fraud, money laundering and terrorist financing. These include the Integrity Policies (Donations and Sponsorships, Gifts & Invitations, and Dealings with Public Servants), the Conflicts of Interest Policy, the Policy on Public Policy, and the Anti-Money Laundering and Terrorist Financing Policy.

Due diligence processes in connection with compliance

Inditex is committed to controlling and preventing compliance risks of third parties with which it has dealings. For this purpose, there is a third-party control system, described in the **Due Diligence Policy** and the implementing internal regulations thereof, which includes the principles and action criteria that aim to align Inditex's relations with its business partners, suppliers and large customers with international standards and best practices in the field of anti-corruption and anti-bribery, the applicable anti-corruption regulations, and the prevention of money laundering and terrorist financing. It also aims to guarantee compliance with the sanctions and commercial restrictions approved by, at least, the European Union, the United States, the United Kingdom and the United Nations, as well as compliance with the regulations on the prevention of forced labour and on due diligence concerning the value and supply chains currently in place in the various jurisdictions where the Group operates.

This process consists of the **identification and analysis of all the suppliers, business partners and third parties** with which the Inditex Group does business, as well as, in certain cases, their main shareholders, directors and beneficial owners. This allows us to identify potential risks related to corruption, fraud, tax evasion, money laundering, international sanctions, forced labour, reputational risks, or similar risks that may be associated with these third parties. The process, for which the Compliance department is responsible, is separate from but aligned with any other analysis of a social, environmental, operational, financial, commercial or any other nature which the Inditex Group may be engaged in with suppliers or other third parties. This due diligence system is consistent with the human rights system, supervised by the Sustainability department.

ⓘ More information in sections *GOV-4. Statement on due diligence* and *G1-2. Management of relations with suppliers* of this Report.

Principles of the **due diligence process:**

/ **Mandatory** for all business partners, large customers, suppliers and third parties with whom we engage in business relations.

/ **Necessary prerequisite** in order to initiate business relations with third parties, which are also monitored.

/ **Prohibition of any business dealings** with third parties regarding which **compliance risks** have been detected, when no action plan to mitigate or remedy such risks is under way.

/ **Reasonableness and proportionality.** Different levels of analysis are applied based on objective criteria (business turnover, industry or market risk, etc.).

The process is carried out **from the outset of the commercial relationship.** All suppliers and other third parties that enter into commercial and/or professional relations with the Group are subject to the scheduled due diligence process, which is increasingly demanding in accordance with certain factors, including: (i) the third party's total estimated business with Inditex; (ii) the market in which the third party is based and carries out its main business; (iii) the sector to which it belongs; and (iv) its degree of interrelation with the authorities and public servants. All existing suppliers are also periodically assessed **during the commercial relationship**, submitting them to the flow that may be applicable to them, in accordance with the Group's internal regulations.

Risks identified as relevant will lead to the implementation of an action plan coordinated by the Compliance department, which may range from a remedial measure to the termination of the business relationship with the third party. The internal regulations describe the roles and responsibilities of the areas involved in the various procedural review flows, as well as in the design, execution and monitoring, where appropriate, of any action plans established.

Additionally, Inditex's internal regulations include restrictions on hiring third parties, only allowing those based in markets authorised by the Group to be hired (i.e., those who meet legal and business operation criteria), and on making and receiving payments to and from third parties which, having met the foregoing requirement, are made from a bank account opened in such markets.

The Group has minimum standards that must be accepted by all its product suppliers: the Inditex Minimum Requirements (IMRs). Among the IMRs are the Codes of Conduct, the Sustainability Policy, the Human Rights Policy, the Traceability Requirements and the Green to Wear standard. By implementing the IMRs, Inditex guarantees that all the product suppliers with whom it works agree to comply with certain social, environmental and product health and safety standards, among others. Furthermore, since 2022, non-product suppliers in Spain have to accept a Declaration of Compliance with Minimum Conditions prior to being registered as Group suppliers. The aforementioned requirements are applied continuously and are a prerequisite for contracting new suppliers and third parties.

G1.MDR-P_01-06

Key Internal Regulations

Our ethical commitments and the action principles that should guide our day-to-day activities and our dealings with all our teams and the supply chain are set out in our Codes of Conduct and developed upon further in other internal rules. To promote knowledge of and compliance with these rules, they are published internally and/or externally and training or awareness-raising initiatives are carried out and adapted to the profile of the people who should know them and apply them in their work.

Core regulations

/ Code of Conduct (approved in 2012 and amended in 2024) ⓘ ESRS 2
/ Code of Conduct for Manufacturers and Suppliers (approved in 2001 and amended in 2012) ⓘ ESRS 2
/ Compliance Policy (2016) ⓘ G1-1
/ Internal Regulations Policy (approved in 2016, as 'Zero Standard', and amended in 2024)

Integrity and transparency

/ Due Diligence Policy (2019) ⓘ G1-1
/ Integrity Policies:
- Gifts & Invitations Policy (approved in 2017, as 'Policy on Gifts and Business Courtesies', and amended in 2024) ⓘ G1-1
- Policy on Dealings with Public Servants (2017) ⓘ G1-1
- Policy on Donations and Sponsorships (2017) ⓘ G1-1

/ Anti-Money Laundering and Terrorist Financing Policy (2018) ⓘ G1-1
/ Conflicts of Interest Policy (approved in 2019 and amended in 2024) ⓘ G1-1
/ Criminal Risk Prevention Policy (approved in 2016 and amended in 2024) ⓘ G1-1
/ Policy on Public Policy (approved in 2024) ⓘ G1-5

Ethics Line

/ Global Policy on Internal Reporting Channels (2023) ⓘ G1-1
/ Ethics Line Procedure (approved in 2012 and amended in 2023) ⓘ G1-1
/ Regulations of the Ethics Committee (approved in 2012 and amended in 2023)

MDR-P_01; MDR-P_02; MDR-P_03; MDR-P_04; MDR-P_05

Below is a summary of the main internal rules related to our corporate ethical culture and business conduct, which are available on the intranet (INET), and on the corporate website (www.inditex.com).

Compliance Policy

Approved by the Board of Directors on 13 December 2016

Key contents	/ Compliance with applicable legislation, internal regulations and the ethical commitments undertaken voluntarily by Inditex
Scope	/ The entire Group (companies and individuals) / Other natural or legal persons linked to Inditex, when possible due to the nature of the relationship and when conducive to compliance
Accountable for the implementation	/ The Compliance department and its chief officer
Third-party standards	/ Spain's Criminal Code / France's Sapin II Law (Loi Sapin II) / UK Bribery Act / US Foreign Corrupt Practices Act (FCPA)

Due Diligence Policy

Approved by the Board of Directors on 10 September 2019

Key contents	/ Describing the process for the identification and analysis of business partners, suppliers and large customers, with whom the Group has dealings, in connection with corruption, fraud, international trade sanctions and similar risks / List of the means available to implement due diligence (Supplier's Master of the Group, Customer's Master of the Group, or the External Compliance Databases, etc.)
Scope	/ The entire Group (companies and individuals) / Other natural or legal persons linked to Inditex, when possible due to the nature of the relationship and when conducive to compliance
Accountable for the implementation	/ The Compliance department and its chief officer
Third-party standards	/ Spain's Criminal Code / France's Sapin II Law (Loi Sapin II) / UK Bribery Act / US Foreign Corrupt Practices Act (FCPA)

Gifts & Invitations Policy

Approved by the Board of Directors on 19 September 2017 and updated on 6 February 2024

Key contents	/ Forms part of the Group's Integrity Policies / Complements and develops the Codes of Conduct / Commitment to zero tolerance of corruption and bribery, and to actively combat and condemn any corrupt practices / Measures to prevent and detect practices relating to gifts and invitations that could compromise the integrity of the Group / Guidelines to prevent corruption and bribery / List of permitted gifts and invitations and guidelines to be followed in this regard
Scope	/ The entire Group (companies and individuals) / People who provide services or collaborate with the Group (including the Board of Directors)
Accountable for the implementation	/ The Compliance department and its chief officer
Third-party standards	/ Spain's Criminal Code / France's Sapin II Law (Loi Sapin II) / UK Bribery Act / US Foreign Corrupt Practices Act (FCPA)

Policy on Dealings with Public Servants

Approved by the Board of Directors on 19 September 2017

Key contents	/ Forms part of the Group's Integrity Policies / Development of the Code of Conduct / The main aim is to actively combat and strongly condemn any corrupt practices and any form of bribery of public servants, including facilitation payments / Guidelines to prevent corruption and bribery
Scope	/ The entire Group (companies and individuals) / Other natural or legal persons related to Inditex, if applicable
Accountable for the implementation	/ The Compliance department and its chief officer
Third-party standards	/ Spain's Criminal Code / France's Sapin II Law (Loi Sapin II) / UK Bribery Act / US Foreign Corrupt Practices Act (FCPA)

Policy on Donations and Sponsorships

Approved by the Board of Directors on 19 September 2017

Key contents	/ Forms part of the Group's Integrity Policies / Commitment to zero tolerance of corruption and bribery, and to actively combat and condemn any corrupt practices / *Compliance* with the main anti-corruption and anti-bribery regulations applicable in the markets in which the Group operates
Scope	/ The entire Group (companies and individuals) / Other natural or legal persons related to Inditex, if applicable
Accountable for the implementation	/ The Compliance department and its chief officer
Third-party standards	/ Spain's Criminal Code / France's Sapin II Law (Loi Sapin II) / UK Bribery Act / US Foreign Corrupt Practices Act (FCPA)

Anti-Money Laundering and Terrorist Financing Policy

Approved by the Board of Directors on 13 March 2018

Key contents	/ Determination of the criteria that will tend to prevent Inditex or Group companies from being used to carry out any kind of money laundering and/or terrorist financing operations / Definition of the due diligence processes implemented within the Company taking into account the different types of business activities we perform
Scope	/ The entire Group (companies and individuals) / Other natural or legal persons linked to Inditex, when possible due to the nature of the relationship and when conducive to compliance
Accountable for the implementation	/ The Compliance department and its chief officer
Consideration given to stakeholders	/ The interests, expectations and needs of stakeholders were taken into account when drawing up the Policy / The Policy also provides for the possibility of establishing collaboration with the most relevant stakeholders to implement it

Conflicts of Interest Policy

Approved by the Board of Directors on 16 July 2019 and last amended on 6 February 2024

Key contents	/ Development of the Group's action principles and guidelines for conduct in connection with conflicts of interest, as well as the implementation of aspects related to the Codes of Conduct / Measures to prevent and avoid and, where applicable, report and manage conflicts of interest arising in connection with any individual as they carry out their professional duties, as well as others raised with customers, suppliers or other stakeholders
Scope	/ The entire Group (companies and individuals) / People who provide services or collaborate with the Group
Accountable for the implementation	/ The Compliance department and its chief officer
Third party standards	/ Spain's Criminal Code / France's Sapin II Law (Loi Sapin II) / UK Bribery Act / US Foreign Corrupt Practices Act (FCPA)

Criminal Risk Prevention Policy

Approved by the Board of Directors on 19 July 2016 and updated on 12 March 2024

Key contents	/ Development of the Codes of Conduct / General principles governing Inditex's commitment to the prevention, detection and, in the event, management of criminal risks to which we are potentially exposed due to our activity, in accordance with applicable legislation in Spain / Guidance on the conduct persons in the Inditex Group should observe while carrying out their duties, including members of the Board of Directors, executives and representatives of the Group / Regulation of the Model of Criminal Risk Prevention, included within the Global Compliance Model
Scope	/ All Group companies and people in teams in Spain (including actions and operations carried out outside Spanish territory) / People who provide services or collaborate with the Group (including the Board of Directors)
Accountable for the implementation	/ The Compliance department and its chief officer
Third-party standards	/ Spain's Criminal Code
Consideration given to stakeholders	/ Analysis of stakeholder engagement to identify the criminal risks to which the Company is potentially exposed due to its activity, in accordance with applicable legislation in Spain

G1-1_02;
G1-1_13

Ethics Line

Grievance mechanism: the Ethics Line

The **Ethics Line** (including both the Global Ethics Line and the various Local Ethics Lines) is the preferred, strictly confidential, internal communication channel available to any employee, director and shareholder of any company of the Group, as well as anyone working under the supervision and management of manufacturers, suppliers, contractors and subcontractors of the Inditex Group may raise, including anonymously:

/ **Questions and/or doubts** about the interpretation or application of the Codes of Conduct or any other internal rules of conduct within the competence of the Ethics Committee.

/ **Infringements and other breaches** of the applicable legislation, the Codes of Conduct or of any other internal rule of conduct within the competence of the Ethics Committee, affecting Inditex and committed by employees, manufacturers, suppliers or third parties with whom the Group has a direct employment, commercial or professional relationship. Any breaches or irregularities related to corruption, fraud and bribery can also be reported via this channel.

The Ethics Line is therefore available to all our stakeholders, including in particular our teams, workers in the value chain, members of the community, and customers themselves.

How the Ethics Line works

1. Concerns: The person concerned reports an incident through the channels provided for this purpose on the intranet (INET) and on the corporate website (www.inditex.com).

2. Management: The Ethics Committee acknowledges receipt of the report and evaluates whether it falls within the scope of application of the Ethics Line.

3. Investigation: The Ethics Committee carries out the investigation process in collaboration, where applicable, with other areas.

4. Measures: Upon completion of the investigation and after granting the affected party the right to be heard, the Ethics Committee will issue its decision on:

/ The closing of proceedings, where no breach exists; or

/ The existence of a breach, its severity and whether it is appropriate to take disciplinary measures and/or complementary actions.

In the **event of a breach**, the measures to be taken will be determined in collaboration with the corresponding department depending on the breach's severity and other circumstances, and **may consist of:**

/ The immediate correction of the breach and the adoption of measures to remedy and prevent future breaches.

/ Disciplinary measures (ranging from warning or admonishment to dismissal).

The **Ethics Committee** is the internal, collegiate, and independent body responsible for the Group's Internal Reporting System and for managing the Ethics Line and must promote the necessary investigations to adequately resolve cases handled, in accordance with the **Policy on Internal Reporting Channels** and the **Ethics Line Procedure** (approved and reviewed, respectively, by the Board of Directors on 3 May 2023). Its composition, operation and competencies are regulated in the **Regulations of the Ethics Committee**, as amended by the Board of Directors on 3 May 2023. The decisions of the Ethics Committee are **binding upon** the Group and upon the person to whom they are addressed.

In addition to the Global Ethics Line, Inditex has **Local Ethics Lines** in 15 markets in order to comply with the requirements and/or best practices applicable in those markets[41].

[41] Belgium, Bulgaria, Canada, Croatia, Czech Republic, Finland, Greece, Hungary, Luxembourg, Netherlands, Slovakia, Slovenia, Sweden, Poland, United States and Puerto Rico.

G1-1_05;
G1-1_12

The Ethics Line is governed by the principles and guarantees established in the **Global Policy on Internal Reporting Channels** and by the **Ethics Line Procedure.** These internal regulations incorporate international best practices in connection with human rights and adapt the Ethics Line to the requirements of the markets in which the Group operates (in particular, to the requirements derived from the transposition into Member States' law of Directive (EU) 2019/1937 on the Whistleblower Protection Directive, which include, among others, personal data protection and the rights of persons using whistleblowing mechanisms).

These internal rules offer the following guarantees and protection measures to the parties involved in the process:

/ Utmost confidentiality.
/ Presumption of innocence and preservation of **the right to honour** of the persons affected by the report.
/ Non-retaliation against any reporter or any person helping the informant during the investigation.
/ Appropriate use of **personal data** processed.
/ The **parties' right** to be heard.

ⓘ All the information regarding the Ethics Committee and the Ethics Line is available on our **intranet** and on our **corporate website** (www.inditex.com), under the 'Ethics Line' tab.

When a concern is submitted via the Ethics Line, the Ethics Committee analyses its content and determines the appropriate measures, including opening an investigation where appropriate.

In keeping with best practices, the Group has a tool provided by an external supplier to receive and handle concerns from the Ethics Line. This tool is accessible **24 hours a day, 7 days a week** and is available in 22 languages.

Proof that stakeholders know and trust the Ethics Line is the fact that communications are received from the various groups, and that these communications have increased during the year, for example in the case of our teams and workers in the value chain. Furthermore, the monitoring and supervision of the cases via the Ethics Line allows us to work to ensure their effectiveness.

ⓘ More information in section *G1-4. Comunications received through the Ethics Line* of this Report.

G1-1_08

As stated in the Global Policy on Internal Reporting Channels, the Ethics Committee, as the body responsible for the Group's Internal Reporting System, must lead any investigations that may be necessary and propose, where needed, the appropriate remediation, prevention and awareness measures. It must carry out its duties independently, impartially and autonomously and respond for the system's management and diligent processing of concerns received via the Ethics Line and other Internal Reporting Channels within that System. In accordance with the Regulations of the Ethics Committee, members of the Ethics Committee must refrain from taking part in the examination, deliberation and/or voting stages on matters in which they incur a conflict of interest.

The Procedure regulates the deadlines for the processing and investigation of concerns received, to ensure that they are properly handled. Those deadlines are consistent with applicable regulations.

G1-1_14

Pursuant to our Code of Conduct and the Ethics Line Procedure, the Company strictly prohibits any form of retaliation or threat of retaliation against persons who report any matter in good faith, as well as against persons who cooperate in the investigation.

MDR-P_01;
MDR-P_02;
MDR-P_03;
MDR-P_04;
MDR-P_05

The main contents of our Global Policy on Internal Reporting Channels and the Ethics Line Procedure are set out below.

Global Policy on Internal Reporting Channels Approved by the Board of Directors on 3 May 2023	
Key contents	/ General principles applicable to the implementation of the Inditex Group's Internal Reporting System and to the different Internal Reporting Channels that comprise it / Protection guarantees for informants making use of the System as provided in the Policy
Scope	/ The entire Group (companies and individuals)
Accountable for the implementation	/ Ethics Committee
Third-party standards	/ Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union Law (the 'Whistleblower Protection Directive')
Consideration given to stakeholders	/ It was the subject of a report to the European Works Council (EWC), a body for assurance and effectiveness of information and consultation of employees on transnational issues

Ethics Line Procedure Approved by the Board of Directors on 17 July 2012 and last updated on 3 May 2023	
Key contents	/ Principles and guarantees applicable to the handling and processing of informants' concerns and enquiries through the Ethics Line / Means made available for the use of the Ethics Line and for submitting concerns / Regulation of the processes for the handling and investigation of concerns and enquiries, including the measures that may be taken
Scope	/ Communications processed through the Ethics Line / In a supplementary capacity, also for communications from all Internal Reporting Channels that do not have their own procedure, or for matters that are not covered therein
Accountable for the implementation	/ Ethics Committee
Third-party standards	/ Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law (the 'Whistleblower Protection Directive') / Similar regulations in those countries where they exist
Consideration given to stakeholders	/ It was the subject of a report to the European Works Council (EWC), a body for assurance and effectiveness of information and consultation of employees on transnational issues

G1-1_10;
G1-1_11

ⓘ More information on compliance training in section *G1-3. Prevention and detection of corruption and bribery* of this Report.

G1-3. Prevention and detection of corruption and bribery

G1-3_01

Corruption and bribery are totally at odds with the way we operate. At Inditex we have zero tolerance for corruption of any kind and are committed to complying with anti-corruption laws in all markets where we operate. We have Codes of Conduct and a number of policies that set out principles and guidelines to prevent corruption and bribery: Due Diligence Policy and Integrity Policies (Donations and Sponsorships, Gifts & Invitations, and Dealings with Public Servants), Conflicts of Interest Policy, and the Policy on Public Policy.

Furthermore, the Global Compliance Model and, in particular, the Model of Criminal Risk Prevention in Spain and other models for the prevention of corruption and other crimes in other markets, aim to prevent and manage risks related to the potential commission of crimes, including corruption, bribery and fraud.

G1-3_02

The Company's Ethics Line is a way to report, among other issues, any unlawful conduct relating to corruption or bribery.

ⓘ More information on the Ethics Line in section *G1-1. Corporate culture and business conduct* of this Report.

G1-3_03

The Audit and Compliance Committee is responsible for risk management and business conduct, including supervision of the Compliance function. At its meetings in February, March, June, September and December 2024, the Committee received from the Compliance function and the Chief Compliance Officer the reports indicated in section *GOV-2. Information provided to governing bodies and sustainability matters addressed*.

G1-3_05

Communication and awareness-raising

We provide everyone in the Inditex Group with knowledge of and access to the internal rules that apply to them. The General Counsel's Office is responsible for carrying out a series of communication and awareness-raising actions:

/ It informs and updates the members of Inditex's Board of Directors on a quarterly basis throughout the year, regarding the compliance matters listed in section *GOV-2. Information provided to governing bodies and sustainability matters addressed*. Prior to meetings of the Board of Directors, it makes the policies or other internal rules available to the directors, for their subsequent approval or amendment.

/ It makes the internal policies and rules applicable to employees available on INET, under the 'Internal Regulations' tab, and communicates them to employees with corporate email.

/ It makes the most significant policies available to all our stakeholders on the corporate website (www.inditex.com), under the tab 'Ethical Commitment'.

The following is a list of policy communications related to the prevention of corruption and bribery that were released in 2024, broken down by type of communication and job classification of the people who received them:

		Professional category			
	Communication type	**Management**	**Supervisor**	**Specialist**	**Total**
Code of Conduct	Newsletter - Update	4,085	3,729	5,900	13,714
Gifts and Invitations Policy	Newsletter - Update	6,377	6,644	12,237	25,258
	Newsletter - Annual Reminder	6,262	7,153	14,478	27,893
Conflict of Interest Policy	Newsletter - Update	6,377	6,663	12,262	25,302
Human Rights Policy	Newsletter - Update	6,371	6,687	12,135	25,193
Criminal Risk Prevention Policy	Newsletter - Update	1,799	2,763	9,077	13,639
Policy for Representatives and Attorneys of Companies within the Inditex Group	Newsletter - Update	6,225	7,126	14,472	27,823
Policy on Public Policy	Newsletter - New publication	5,842	6,914	14,175	26,931
Enterprise Risk Management Policy	Newsletter - Update	6,286	7,218	14,487	27,991

Moreover, the Group's product suppliers have access to the supplier extranet to consult the IMRs applicable to them. Notable among all these internal regulations are the Codes of Conduct, which set out the guidelines for preventing corruption.

Compliance training plan

G1-3_06;
G1.MDR-A_01-12

Training our people and suppliers is key to strengthening our corporate ethical culture and implementing our Global Compliance Model across all our operations.

Our Code of Conduct sets out the action principles that must guide all our actions (respect, integrity and honesty, transparency and accountability) and reminds all people in the Group that they are required to complete the mandatory training when called.

Likewise, our Code of Conduct emphasizes management's commitment 'Tone at the top' and includes the fundamental role of team leaders in the application of the Code and in the promotion of the corporate ethical culture. Therefore, they are asked to act by example; to promote knowledge of and compliance with the Code; to foster a culture of dialogue and respect in the management of their teams; and to encourage the communication of doubts or breaches, without fear of retaliation.

The promotion of the corporate ethical culture is supported by the communication and awareness-raising actions described above, and by a Compliance Training Plan (hereinafter, '**Training Plan**'), with training and awareness-raising measures adapted to the risk profile of the Group's employees.

G1-4_03;
MDR-A_01;
MDR-A_02;
MDR-A_03;
MDR-A_04;
MDR-A_05

Global campaign on the Code of Conduct

In 2024, the Training Plan included **a global campaign on the Code of Conduct** (updated in February 2024) in order to familiarise everyone in the Group with the culture of ethics and compliance. Corporate tools have been used to ensure regular monitoring and adequate traceability of communication, awareness-raising and training actions:

/ Communication and awareness-raising:

- The Code is available in 34 languages on INET to everyone in the Group.
- A global news article was launched on INET, which received the most likes during the year.
- An information page on the Code was published in the 'Ethical and responsible culture' section of INET, which received 61,043 visits, and the information space on INET dedicated to Compliance was updated, with 65,466 visits.
- A launch video on the Code was shown and informative posters on the Code and the Ethics Line were published in all stores and work centres.
- In the 'Ethical Commitment' section of our corporate website (www.inditex.com), the Code of Conduct was published for all our stakeholders and received 31,011 visits.

/ Acceptance:

- To obtain acceptance of the Code of Conduct by everyone in the Group, a pop-up message was activated on INET with access to the Code of Conduct, so that it could be read and accepted. Thanks to this campaign, the Code has been accepted by 97% of employees.

/ Training for all our people:

- A mandatory e-learning course on the Code of Conduct was published in Tra!n, with an accessible version for people with disabilities. This training covers the Ethics Line and its main protections, the prevention of corruption and bribery, and other topics, and has already been completed by 91% of employees.

/ Specific training for supervisors and teams in the People department:

- In addition, training was given to supervisors, the People department and Compliance delegates from headquarters, retail concepts and key subsidiaries, due to their fundamental role in promoting the corporate ethical culture and their greater exposure to certain compliance risks. The training was designed and adapted to the particularities of these groups, emphasising the sections of the Code of Conduct on our integrity, covering topics such as bribery and corruption prevention, managing gifts and invitations, handling conflicts of interest and the Ethics Line. Other departments were also invited to these training sessions to reinforce the messages on harassment prevention, privacy and our programme Respectful. A total of 2,690 people received this specific training (in-person and/or hybrid).

G1-3_08

As regards the governing bodies, during the process of drafting the Code of Conduct, a specific meeting of the Board of Directors was held to receive feedback and contributions from the directors to assist in drafting Code of Conduct.

In February 2024, the Board of Directors approved the final version of the Code of Conduct and received a presentation on its contents. The members of the Board of Directors received and accepted the Code of Conduct and undertook to comply with it.

/Compliance Training Framework Plan

This Compliance Training Framework Plan (hereinafter, **'Framework Plan**'), is coordinated by the Compliance department and organises the training provided by the main corporate areas exposed to compliance risks, providing support in the creation or adaptation of mandatory training content and in the review of the target groups for such training.

The goal is to ensure a homogeneous and robust oversight of the training provided to mitigate priority compliance risks and contribute to building a corporate ethical culture by targeting the courses at those employees most exposed to compliance risks.

To manage this Plan, we have an exclusive space for mandatory training in Tra!n. Each person has different courses, as this training has been specifically tailored to their risk profile, position and responsibility. Furthermore, throughout the year, the training courses completed were monitored, which consists of periodic reminders being sent to employees with mandatory training courses pending about the need to complete them before the end of the year. To this end, and to facilitate course completion, a specific monitoring tool was made available to the People department teams.

Lastly, and always with a risk-based approach, the Compliance department has created two new mandatory courses 'New Products' and 'Control Claims', aimed at a priority group of commercial, sustainability and other corporate areas affected by these procedures. The contents of 'New Products' deal with the viability of this type of articles (those that have not been marketed previously by the concept or those already marketed previously that have some differentiating element that implies the need to reassess whether they are viable for marketing) and to indicate the steps to follow to analyse the marketing requirements of a new product in the different markets in which it is to be launched. The 'Claims' course reviews the basic concepts of the Control Claims validation flow, indicating the steps to follow to analyse the viability of a claim (marketing claim) before using it.

In 2024, the following mandatory training courses were published for employees in corporate areas with higher exposure to compliance risks:

Labour Law	• Global Anti-Harassment Policy in the workplace
Industrial Property	• Responsible Creativity
Information Security	• Cybersecurity: Basic principles of Cybersecurity • Cybersecurity: Learn about the PCI-DSS standard • Cybersecurity: Secure Code V2 • Cybersecurity: phishing
Compliance	• Code of Conduct • Control Claims • New Products • Model 231

G1-4_03;
G1-3_07

Indicators on compliance training for the priority group

With regard to the Training Plan, it should be noted that, in the 2024 financial year, 86% of the priority group of our people has received training (in-person or online) on the subject of Compliance. This training has been aimed at employees who, either on account of their position and responsibilities or because of the type of activity they carry out, are exposed to a greater risk of compliance breaches and, in particular, the commission of offences relating to corruption between individuals. The compliance training metrics linked to the priority group of employees are presented below:

Priority group (employees) [1]

	2024		2023	
Job classification	**No. of unique people trained [2]**	**% of the priority group**	**No. of unique people trained [2]**	**% of the priority group**
Management[3]	4,765	84%	5,147	79%
Supervisors	3,101	92%	3,265	78%
Specialist	7,861	85%	14,742	80%
Total	**15,727**	**86%**	**23,154**	**79%**
Region				
Americas	1,111	95%	1,194	98%
Asia and rest of the world	1,401	90%	1,415	90%
Spain	9,001	85%	8,785	84%
Europe (ex-Spain)	4,214	85%	11,760	73%
Total	**15,727**	**86%**	**23,154**	**79%**

[1] Employees who, due to their position, responsibility or duties, are exposed to compliance risks.
[2] When a person has attended various training sessions in the year, they are counted only once.
[3] This category also includes members of the Management Committee and Senior Management.

With regard to the Board of Directors, 100% of its members have received compliance and/or corruption or bribery training.

ⓘ More information on the Board of Directors skills in section *GOV-1. The role of the governing bodies* of this Report.

In addition, 813 product suppliers and factories of the Group present in 30 markets received training in compliance matters through a specific e-learning course that has allowed them to learn the principles and patterns of behaviour that we expect from them within the framework of our commercial or professional relationship.

G1-4. Communications received through the Ethics Line

Communications to the Ethics Line (including both the Global Ethics Line and the various Local Ethics Lines) are recorded in a tool through which they can be tracked. Periodically, the Compliance department reports to the Audit and Compliance Committee on the activity of the Ethics Line and the development of the cases submitted through it. Thus, the concerns received through the Ethics Line are monitored and controlled and their effectiveness is guaranteed.

During 2024, the Ethics Line recorded a total of 791 concerns (515 concerns in 2023).

Breakdown of concerns by topic

	2024	2023
HR, diversity and workplace respect:	619	321
related to discrimination, workplace/sexual harassment or other potential breaches of fundamental rights; and	200	152
related to disputes over working conditions, grounds for dismissal or the implementation of personnel selection processes	419	169
Business integrity[(1)]	44	63
Environment, health and safety	14	10
Inappropriate use of Company assets	1	1
Financial, accounting or audit and/or control fraud	0	0
Queries	67	42
Others	46	78
Total number of concerns	**791**	**515**

(1) Including cases related to potential behaviours of taking advantage of the position in Inditex to obtain personal business opportunities or other benefits, fraud or non-compliance with procedures.

Breakdown of concerns and cases

G1-4_04; G1-4_06

	2024	2023
Received concerns	791	515
Closed cases	556	294
Concerns classified as beyond the authority of the Ethics Line	313	221
Confirmed cases of corruption	4	5
(i) Disciplinary measures or termination of employment due to confirmed cases of corruption	3	5
(ii) Total number of confirmed cases where contracts with business partners have been terminated or not renewed due to corruption-related offences	1	2
Confirmed cases of discrimination	4	3
Disciplinary measures or termination of employment due to confirmed cases of discrimination	4	3
Confirmed cases of harassment	9	3
Disciplinary measures or termination of employment due to confirmed cases of harassment	8	3

Of the total of 791 concerns received by the Ethics Committee 2024, 556 are closed. Of these, 313 were classified as being beyond the authority of the Ethics Committee and 63 as not requiring any further action or monitoring by the Ethics Committee. Of the remaining closed cases: (i) 64 were queries, (ii) 75 were cases which, after investigation, were found not to be non-compliances, and (iii) the remaining 41 were cases of non-compliance requiring appropriate action.

Of the latter, four cases were related to the prevention of corruption and bribery, 34 were linked to diversity and respect in the workplace and the remaining three were related to other violations of the Inditex Group's Codes of Conduct. In three cases, the non-compliances detected affected employees of suppliers of goods and services, and the necessary measures to remedy the situation were taken. In all cases where a breach is confirmed, appropriate remedial measures will be adopted depending on the nature of the breach detected and its severity. These measures consisted, depending on the case, of disciplinary measures (either termination of employment or warning), training and review of internal procedures.

G1-4_01;
G1-4_07;
G1-4_08

With regard to the confirmed reports of corruption, no relevant aspects affecting the Company have been observed in any of them. Disciplinary measures or termination of employment due to confirmed reports of corruption are detailed in the table above.

At the same time, during 2024 and 2023, the Group has not been aware, either through its Ethics Committee or through other means, of the processing of legal proceedings concerning corruption or bribery that affect the Company.

G1-4_02

Consequently, in 2024, the Inditex Group neither received through the channels available for this purpose any significant fines or non-monetary penalties for non-compliance with the legislation or regulations applicable to it in matters of corruption or bribery.

G1-5. Political influence

MDR-P_01;
MDR-P_02;
MDR-P_03;
G1-5_01;
MDR-P_04

In 2024 we developed and approved our Policy on Public Policy:

Policy on Public Policy

Approved by the Board of Directors on 10 December 2024

Key contents	/ Commitment to a transparent and responsible development of the preparation of public policies that affect our business activities, our stakeholders and society at large / Development of the principles of action set out in the Group's Codes of Conduct and the Integrity Policies / General principles: responsibility, integrity and honesty, transparency and respect
Scope	/ The entire Group (companies and individuals) / People who provide services or collaborate with the Group (including the Board of Directors)
Accountable for the implementation	/ Public Policy department and its chief officer
Third-party standards	/ OECD Guidelines for Multinational Enterprises on Responsible Business Conduct / United Nations Sustainable Development Goals (SDGs) / OECD Principles on Public Policy and Responsible Corporate Political Engagement (currently under development)

G1-5_02

Like our Policy on Public Policy, Inditex's Policy on Donations and Sponsorships expressly prohibits making donations to political parties, either directly or indirectly. This prohibition is included in the Company's Code of Conduct, which adds that, as a general rule, no person from Inditex can offer, grant, solicit or accept, either directly or indirectly, gifts or invitations, of any kind and from any authorities or public officials.

G1-5_03;
G1-5_06;
G1-5_07;
G1-5_08

In accordance with these policies, no contributions were made (in cash and/or in kind) to political parties during the year.

G1-5_11

With respect to our governing bodies, no members of the Board of Directors have held a comparable position in government administrations in the two years prior to their appointment. Furthermore, our Conflicts of Interest Policy states that if the recruitment of any person by the Group, especially persons coming from public authorities, may give rise to a conflict of interest, the Ethics Committee may propose that suitable measures be agreed to safeguard the Group's interests, in accordance with our Codes of Conduct and internal regulations.

G1-5_09

Public policy activities

Our public policy activities focus primarily on four main topics: **Sustainability, Trade, Digital and Finance.**

G1-5_10

To implement these activities, the Inditex Group is a member of the European Union Transparency Register, and its registration number is 518095443081-20.

B. Suppliers relations

G1-2. Management of relationships with suppliers

G1-2_02

Our business model is based on an agile and flexible supply chain. This enables us to meet demand and adapt to new social and environmental standards quickly and efficiently.

Proximity is one of the key criteria of our supply chain, allowing us to respond nimbly to the market. A very significant portion of the cutting, sewing, dyeing, washing, printing or finishing factories that manufactured our garments in 2024 are located in Spain or neighbouring countries like Portugal, Morocco and Türkiye.

Overall, as of 2024 we had 6,615 factories which include all tiers of our supply chain in 50 markets and employed more than three million people (6,710 factories, 49 markets and more than three million people in 2023).

The supply chain at Inditex in 2024

Distribution by geography

European Union: 1,012 factories

Europe outside the EU: 1,302 factories

Americas: 23 factories

Asia: 3,837 factories

Africa: 441 factories

Distribution by process

2,517 Spinning, weaving, and other raw material processes

81 Cutting

3,270 Sewing

105 Dyeing and washing

199 Printing

183 Finishing

260 Non-textile products

A fundamental tool for managing our supply chain are our supplier clusters, spaces to foster dialogue and cooperation with industry actors. In 2024 we worked with ten clusters in our main production markets: Spain, Portugal, Morocco, Türkiye, India, Bangladesh, Pakistan, Vietnam, China y Cambodia.

Main policies, standards and principles on which our supply chain management is based

Our Code of Conduct for Manufacturers and Suppliers (CCMS) is the foundation on which we build our relationships with suppliers and manufacturers in our supply chain. It includes all the standards they are obliged to meet with regard to labour rights, product health and safety and environmental issues.

ⓘ More information in section *MDR-P. Policies* of this Report.

ⓘ More information in the *Code of Conduct for Manufacturers and Suppliers* available on Inditex's corporate website.

In addition to our CCMS, at Inditex we implement **our own Green to Wear standard**, aimed at reducing the environmental impact of our supply chain, as well as improving the health and safety of our articles and fostering best practices.

ⓘ More information in section *Own standards and certifications* of this Report.

ⓘ More information in the document *Green to Wear* available on Inditex's corporate website.

Another important tool for supply chain management are our **Traceability Requirements for Manufacturers and Suppliers**, which increase the level of detail of the minimum requirements for our suppliers reflected in the CCMS.

In conclusion, any manufacturer or supplier wishing to form part of our supply chain must comply with the Code of Conduct for Manufacturers and Suppliers, with the Green to Wear standard, if applicable, and with our Traceability Requirements. To verify this compliance, we conduct regular and periodic controls to ensure that our standards are upheld. The breach of any of them may entail the termination of the business relationship.

In addition, internally we promote **responsible purchasing practices**, guiding the decisions of our buyers and product teams with the aim of improving working conditions in the supply chain and fostering sustainable development in the textile sector. In this connection, our involvement in the ACT initiative (Action, Collaboration, Transformation) is pivotal.

ⓘ More information in section *S2. Workers in the value chain* of this Report.

ⓘ More information in the report *Supply chain: management to transform the sector*, is available on Inditex's corporate website.

Traceability of the supply chain

We see traceability as **our ability to identify and trace the history, application, location and distribution of products, parts and materials. This definition** is consistent with Recommendation No. 46 **of the United Nations Economic Commission for Europe**, which advocates enhancing traceability and transparency of sustainable value chains in the garment and footwear sector.

Based on our Traceability Requirements, over the course of 2024 we have added new developments to monitoring, such as:

- Supporting the implementation of the fibres plan, with emphasis on the traceability of raw materials.
- Improvement of our tools to make it easier for suppliers to provide us with the necessary information.

Thus, our suppliers must know their supply chain and work only with manufacturers and intermediaries that comply with our sustainability standards and that have been previously assessed and approved by Inditex. They must therefore report which facilities and intermediaries are involved in each production process, from fibre or yarn to the final garment for each order. They must also prove the use of lower-impact raw materials[42], such as organic or recycled cotton, viscose from preferred sources or European linen.

To ensure that these requirements are met, our traceability ecosystem allows us to evaluate the traceability of our products. We also provide training to help our suppliers solve specific challenges regarding the use and understanding of traceability procedures.

[42] More information on the criteria that fibres or materials must meet to be classified as lower-impact in the *Methodological Annex* of this Report.

Traceability assessment
We use various control mechanisms operating in parallel to verify compliance with our traceability requirements:

/ **Designation control check**: to verify that our suppliers have provided information on their supply chain by the established deadline.

/ **Review of certificates:** we check the raw materials' certificates to approve them.

/ **Traceability audits:** we verify the information provided by our suppliers on site, through unannounced visits to the production facilities. This allows us to check the production processes, the productions in progress and the ones completed. The findings are then compared with the information entered by the supplier. In 2024, 10,387 traceability audits were carried out (12,100 audits in 2023).

Monitoring, assessment and continuous improvement

Our aim is to build strong, long-standing relationships with our suppliers. Consequently, in 2024, 10,923 supply chain manufacturer audits were carried out by our own teams and external auditors, specialised by sphere of audit and trained in accordance with the Inditex methodology. They conducted pre-assessments, environmental preliminary assessments, and social and environmental audits.

G1-2_03

/ Pre-assessment
These audits are carried out before the factory can receive any order from Inditex. These audits check that they comply with our Code of Conduct for Manufacturers and Suppliers (CCMS) and the IMR (Inditex Minimum Requirements) applicable to them. Without this first step, no facility can join our supply chain.

The IMR are requirements set out in several key documents, such as the Human Rights Policy and the Traceability Requirements for Suppliers and Manufacturers, which establish the social, environmental or product health and safety standards our manufacturers must meet to become eligible to receive orders.

In 2024, 2,175 pre-assessment audits were carried out (2,111 in 2023).

/ Environmental pre-assessment
Once the new factory passes the pre-assessment audit, a preliminary environmental assessment is conducted remotely by external auditors. This ensures that facilities subject to our Green to Wear standard comply with our most demanding environmental requirements. Facilities classified as not approved at this stage cannot receive orders from Inditex.

In 2024, 251 environmental pre-assessments were executed (301 in 2023).

/ Social audits
After the *pre-assessment* audit, **we conduct** social audits **on a regular basis** to all factories in our supply chain. These audits serve to verify compliance with our CCMS and consist of a site visit (including a document review, verification of facilities and interviews with workers and company management) to verify wages, working hours, health and safety conditions, among other requirements of our Code of Conduct for Manufacturers and Suppliers.

Social audits may be carried out by internal or external auditors in accordance with the Inditex methodology. To ensure their quality, we carry out control audits to verify that our methodology is being properly implemented. In 2024, 6,468 social audits were carried out at the factories in our supply chain (6,892 in 2023)[43].

In addition, social audits using our own methodology have also been carried out in more than 60 external logistics centres this year.

As a result of the social audits, the manufacturers are classified in a social ranking based on their degree of compliance with the Code of Conduct for Manufacturers and Suppliers (CCMS). In 2024, the social ranking of the active manufacturers in our supply chain was as follows:

[43] Includes social audits carried out using the Inditex methodology and those carried out using the Social & Labor Convergence Program (SLCP) methodology integrated in our systems.

Classification of factories in our supply chain by their social ranking

	2024		2023	
Classification	**Number of manufacturers**	**%**	**Number of manufacturers**	**%**
A	3,757	57%	3,594	54%
B	2,453	37%	2,669	40%
Subject to CAP - C	103	2%	163	2%
Subject to CAP - D	248	4%	251	4%
PR	54	1%	33	0%
Total	**6,615**	**100%**	**6,710**	**100%**

Social ranking	**Audit results**
A	Complies with the CCMS
B	Does not comply with some non-relevant aspect of the CCMS
Subject to CAP - C	It fails to comply with some sensitive but inconclusive aspect of the CCMS that triggers the immediate implementation of a Corrective Action Plan
Subject to CAP - D	Breaches of the CCMS triggering the immediate implementation of a Corrective Action Plan
PR	Undergoing an auditing process

In terms of compliance with the Code of Conduct for Manufacturers and Suppliers, the performance in active factories of our supply chain is shown in the following table:

Compliance with the Code of Conduct for Manufacturers and Suppliers in 2024

Percentages according to geographical zones and social compliance areas

	Africa	**Americas**	**Asia**	**Europe outside the EU**	**European Union**
No forced labour	Over 90%	Over 90%	Over 90%	Over 90%	Over 90%
No work by youths or child labour[1]	Over 90%	Over 90%	Over 90%	Over 90%	Over 90%
No discrimination	Over 90%	Over 90%	Over 90%	Over 90%	Over 90%
Respect for freedom of association and collective bargaining	Over 90%	Over 90%	Over 90%	Between 70% and 90%	Over 90%
No harsh or inhumane treatment	Over 90%	Over 90%	Over 90%	Over 90%	Over 90%
Hygiene at work	Between 50% and 70%	Between 70% and 90%	Between 50% and 70%	Between 50% and 70%	Between 50% and 70%
Wage compliance	Between 50% and 70%	Between 70% and 90%	Less than 50%	Between 50% and 70%	Between 70% and 90%
Working hours	Over 90%	Between 70% and 90%	Less than 50%	Less than 50%	Over 90%
Environmental awareness	Over 90%	Over 90%	Over 90%	Over 90%	Over 90%
Regular work	Between 70% and 90%	Over 90%	Over 90%	Between 50% and 70%	Over 90%
Implementation of the Code[2]	Less than 50%	Over 90%	Between 50% and 70%	Less than 50%	Between 50% and 70%

[1] Includes the lack of suitable systems for verifying the age of workers.

[2] Includes the lack of suitable systems for registering and communicating with workers.

Over 90% | Between 70% and 90% | Between 50% and 70% | Less than 50%

/ Environmental audits

Compliance with our Green to Wear standard, targeting facilities that mainly carry out wet processes, is regularly verified through environmental audits. In 2024, 2,029 environmental audits were carried out (1,868 in 2023).

These audits are conducted by external auditors in announced visits during which documentation is reviewed and, where applicable, waste water samples are analysed unannounced. The results are shared with the rest of the sector within the framework of our collaboration with Zero Discharge of Hazardous Chemicals (ZDHC).

As a result of these audits, 85% of the manufacturers required to comply with the Green to Wear standard (80% in 2023) are rated as A or B, the highest environmental performance ratings in our methodology.

/ Continuous improvement

We know that continuous improvement is key to sustainable supply chain management. Accordingly, we use **Corrective Action Plans (CAPs)**, which are roadmaps to support manufacturers in their improvement processes and help them to correct and prevent non-compliances. These plans may be carried out in collaboration with other organisations, such as NGOs and trade unions. In the most sensitive non-compliance cases —classified as being 'subject to CAP' according to social or environmental standards— the plan lasts approximately six months.

In 2024, the following CAPs were carried out:

- **Social CAP:** we carried out 306 CAPs, of which 223 at factories with a 'Subject to CAP - D' rating and 83 at production centres with other ratings (490 CAPs in 2023: 285 in factories with a 'Subject to CAP - D' rating, and 205 in sites with other ratings).
- **Environmental CAPs:** we launched 353 CAPs. 91 of these plans were carried out in factories with a 'Subject to CAP - D' rating, and 262 in sites with other ratings (327 CAPs in 2023: 99 in factories with a 'Subject to CAP - D' rating, and 228 in sites with other ratings).

Despite the importance for Inditex of accompanying the manufacturers of our supply chain in improving their social and environmental performance, our commitment to compliance with our standards entails a zero tolerance policy with those who do not show a willingness to improve. Consequently, if the verification audit still reveals critical non-compliance once the plan has been completed, the factory will not be able to continue working for with our Company.

/ Other continuous improvement tools

In addition to the CAPs, our Company implements various improvement and support projects for manufacturers, such as those developed as part of the Workers at the Centre strategy. In 2024 we also continued with our improvement plans, as part of our Supply Chain Environmental Transformation Plan, with a particular emphasis on water, discharges, management of chemical products and energy.

ⓘ More information in sections *S2. Workers in the value chain*. and *E1-3. Actions related to climate change* of this Report.

ⓘ More information in the report *Supply chain: management to transform the sector*, available on Inditex's corporate website.

G1-2_01

Mutual respect and trust are the basis for Inditex's relationships with its suppliers. The Group has devised payment procedures that indicate the importance of complying with legal payment deadlines for the proper functioning of the value chain, based on long-term relationships and responsible financial management.

These procedures are mandatory for all the Group's companies in connection with managing payments with all kinds of suppliers, including suppliers classified as SMEs. They define the payment periods, as well as the payment means.

ⓘ More information in section *G1-6. Payment practices* of this Report.

G1-6. Payment practices

G1-6_01;
G1-6_02;
G1-6_03

With regard to payment practices, the most common method of payment to our suppliers is by bank transfer, and among the measures that the Group offers its suppliers are various financing programmes.

In addition, specifically focusing on the suppliers across our supply chain, we belong to ACT (Action, Collaboration, Transformation), through which we undertake five specific commitments in connection with responsible purchasing practices, that include agreeing and respecting fair payment conditions and, therefore, respecting the established payment periods.

The responsible management of our suppliers is paramount for the Group. We have therefore developed a third-party payment procedure to underpin our commitment to meet legal and agreed payment deadlines, in order to ensure that our value chain activities function optimally.

ⓘ More information in section *G1-2. Management of relationships with suppliers* of this Report

The following table shows the Group's average payment period, along with the standard payment period and the percentage of payments within the standard payment period, arranged by type of supplier:

Type of supplier	Supplier's origin	Average payment period (days)	Standard payment term[1] (days)	% of payments within the standard period
Trade creditor's invoices[2]	EU	36	60	94%
	Other	32	60	95%
Procurements: Finished product[3]	EU	99	90	82%
	Other	98	90	95%
Procurements: Raw Material[3]	EU	60	60	98%
	Other	122	120	94%

[1] The Group concentrates its main payments twice a month.

[2] The Group pays its suppliers within 60 days in accordance with current EU regulations. However, 75% of the volume of payments made to these creditors has been paid within 30 days.

[3] Payments outside the standard period correspond to merchandise with validation retained in the warehouse or supplier blocks.

G1-6_05

ⓘ More information in the *Methodological Annex* of this Report.

G1-6_04

At present, no legal proceedings have been brought against the Group for delays in payment to its suppliers, manufacturers and/or third parties.

Additional information. Cybersecurity

During 2024, cyber threats have increased in number and complexity, due to technological advances and the exponential growth of data and connected devices, leading organisations to take more sophisticated and proactive measures to protect their assets.

Emerging technologies such as artificial intelligence and machine learning, along with cloud computing, have transformed both the landscape of cyberattacks and the defence strategies. On the one hand this allows malicious actors to find new ways to achieve their goals, and on the other it enables companies to more accurately anticipate risks and implement controls.

In this new context, cybersecurity is no longer seen as a simple protective measure, but as a central pillar for the resilience of a business and customer trust, and has become a key factor in the competitiveness of organisations.

Governance and strategy

In recognition of the risks inherent to our activity and the need to protect our stakeholders (customers, shareholders, employees, investors, suppliers, partners, etc.), we are committed to continuous improvement in security management within a framework designed to guarantee information confidentiality and integrity, as well as the availability of all the processes that underpin Inditex's retail and distribution channels.

Senior Management's firm backing in cybersecurity matters allows us to continue making the necessary investments to minimise the risks associated with cyberthreats. In 2024 we ramped up our investment in cybersecurity by 7% with respect to the previous year, implying a cumulative increase of 27% over the last three years. This investment has helped consolidate and strengthen our plan for the continuous improvement of our cybersecurity capabilities and promote new key initiatives to achieve our strategic goals.

In response to the current context and external threats, and for the purpose of continuing to drive continuous improvement with respect to unpredictable risks, we have developed our **Next-Gen** strategic cybersecurity plan, first devised in 2020. This plan is aimed at ensuring a comprehensive and proactive approach to protection in our Company for the next two years to enable us to anticipate potential threats, optimise the use of resources and guarantee business continuity in the event of an incident. At the same time, we have launched a project to review and update our cybersecurity risk management methodology, with a view to improving the identification, assessment and mitigation of risks that could affect Inditex, thereby strengthening our strategic decision making.

The **Information Security Policy,** available on Inditex corporate website, is a key document that, along with the accompanying regulations and procedures, establishes the core principles to ensure that our people act in keeping with the information security goals and standards. The Information Security department is the area in charge of achieving this and the Information Security Committee, comprising members of Senior Management, is the supervisory body that ensures that best practices in security management, applicable regulations and ethical values are applied throughout the Company, as provided in the Regulations of the Information Security Committee.

ⓘ More information on the Information Security Policy in section *S4-1. Policies related to consumers* of this Report.

Since 2022, our Chief Information Security Officer Charter has defined the framework of action and competencies of this function, regulating its place in the Company, levels of organisational autonomy and independence (reporting to the CEO), responsibilities and reporting lines:

/ The Chief Information Security Officer reports at least twice yearly to the Inditex Board of Directors' Audit and Compliance Committee, and, where necessary, the relevant governing bodies of Inditex. The Chief Information Security Officer also reports at least every quarter to the Information Security Committee regarding the main risks and aspects linked to cybersecurity at Inditex.

/ The Cybersecurity Advisory Committee, a consultative and advisory body made up of independent experts, advised us on a number of topics at the two meetings held in 2024. At these meetings, we analysed:

- the risks arising from the current geopolitical landscape, which pose a constant challenge to information security, requiring proactive vigilance and that may impact on the Company's information security,
- threats and opportunities related to the use of artificial intelligence, highlighting the importance of adopting this technology responsibly and being aware of the potential challenges it may present,
- the importance of not overlooking the basics of cybersecurity in favour of more common threats,
- the legal responsibility of the Chief Information Security Officer,
- emerging cybersecurity threats, including new intrusion techniques or vulnerabilities that require defences to be constantly evolved,
- effective training and awareness strategies to build a solid cybersecurity culture,
- cybersecurity reporting methods that strengthen incident management and improve decision making in cybersecurity,
- information classification and protection strategies, examining different models and the impact of each in terms of user experience,
- matching cybersecurity to the particular characteristics of each business sector, highlighting the unique challenges and specific solutions,
- the various standards and regulations in place and in the pipeline, and the importance of anticipating legal requirements so as to guarantee their compliance-

Members of the Board of Directors are informed about the discussions of meetings of the Cybersecurity Advisory Committee by the Audit and Compliance Committee, in accordance with the established procedures. The meeting held on 12 November 2024 was attended by two members of the Board of Directors. These meetings are vital to strengthening the decision-making process in connection with cybersecurity and to furthering the Company's strategy on this front.

Compliance

Our commitment to cybersecurity includes a robust strategy, Senior Management's backing and strict compliance with international best practices and regulations. We continue to closely track cybersecurity regulations, and in 2024 we conducted an impact analysis of the transposition of the new Directive (EU) 2022/2555 Network and Information Security (NIS2) by the EU member states that have already implemented it. This directive aims to improve the security of networks and information systems in European territory. We have also assessed the implications of DORA Regulations (the Digital Operational Resilience Act) for Inditex, which aims to strengthen operating resilience and cybersecurity in the financial sector.

In 2024, we proactively assessed our position with respect to the Good Governance Code on Cybersecurity, drawn up by the National Cybersecurity Forum in collaboration with the Spanish National Securities Market Commission (CNMV). During this process, we identified complete or partial alignment with the recommendations set out in the Code and devised an improvement plan to increase our adherence to its guidelines, evidencing our commitment to implementing best practices in the area of cybersecurity.

As in previous years, we conducted various external assessments, both mandatory and voluntary, to analyse our alignment with local and international cybersecurity best practices and standards. As a result, we have successfully renewed all major information security certifications.

/ **Payment Card Industry-Data Security Standard 4.0 (PCI-DSS)** on the protection of our customers' payment card data.

/ **ISO/IEC 27001:2022**, which evaluates our Information Security Management System.

/ **Korean Information Security Management System (K-ISMS**), which evidences our adherence to legal cybersecurity requirements in South Korea.

/ **Multi-Layer Protection Scheme (MLPS)**, which regulates cybersecurity issues in China.

We also continue to work with the Data Protection and Privacy department to comply with the legal obligations pursuant to the General Data Protection Regulation (GDPR).

In 2024, we also carried out numerous internal reviews, both by third parties and by the Oversight area, to ensure compliance and proper application of the policies and procedures. We periodically evaluate our level of cybersecurity maturity, comparing our results with those of companies in other sectors subject to exacting standards, such as firms in the banking or tech industries.

Furthermore, in 2024 we developed the initiative aimed at obtaining greater visibility, including prior to contracting, concerning the security standards of our relevant partners, to reduce the risks that might affect them. In addition, we continue to pay attention to security in our supply chain, having a team dedicated to carrying out reviews and implementing controls to verify the level of security and guarantees in the service provided by third parties.

Detection and response

The detection and response teams have focused their efforts on designing and implementing new initiatives, and evolving existing ones, with particular attention to vulnerability management and high-risk assets. In 2024 we improved our process of classifying vulnerabilities based on their risk level. As a result, we have managed to more efficiently prioritise their resolution, ensuring a more agile and effective response with respect to the most critical vulnerabilities.

Over the course of 2024, we have strengthened our defence capabilities through specific initiatives focused on optimising detection and response to the most prevalent threats in the external cyber environment such as Distributed Denial of Service (DDoS) attacks, Credential Stuffing and vulnerabilities in third-party products.

We have a **specialised cyberintelligence team** whose main function is the early detection of the risks and threats we face by means of continuous monitoring. In 2024 we carried out an analysis of the actors that might pose a threat to the Company and the techniques, tactics and procedures (TTPs) they might use in malicious activities. This analysis enabled us to identify the methods used by these actors, assess our degree of readiness in respect of these TTPs and propose improvements to optimise our detection and response capabilities.

Additionally, we are a member of CSIRT.es (Platform of Spanish Cybersecurity and Incident Management Teams) and TF-CSIRT (Working Group of Security Incident Response Teams). The purpose of these groups is to share information on major cybersecurity incidents and improve cooperation and coordination to respond swiftly to any situation that may affect large companies in Europe and neighbouring regions. Membership of these organisations also allows us to strengthen relationships with global entities and partners in other regions, addressing cybersecurity challenges on a broader scale.

We own a Security Operations Centre (SOC) available 24 hours a day, 7 days a week in charge of the detection, analysis, notification and resolution of potential security incidents that may affect the Company. In 2024, a total of 60 events of interest (123 in 2023) were recorded, the most relevant of which we reported to the Information Security Committee. None of these events had a material impact on our operations or financial statements.

We remain committed to the automation of security operations, improving the speed, scalability, accuracy and efficiency of detection and response to cyberthreats. Furthermore, recognising the increasing importance of artificial intelligence, we have worked with other areas of the Company in an AI governance initiative aimed at developing a framework to ensure that it is used responsibly and transparently, in line with ethical principles and regulations.

Intrusion prevention

The deployment of prevention measures is one of the most important tasks of our activity, and for this purpose with have **more than 700 external researchers participating** in our private vulnerability detection programme, the aim of which is to find weaknesses in our perimeter. Furthermore, we have a new public rewards programme for the online retail environment, in collaboration with a community of more than one million active researchers. We also continue to conduct crowdsourced pentesting which gives us a greater diversity of skills and a broader and more varied perspective regarding potential weaknesses in our systems.

Also in this field, we have had independent external staff carry out new *Red Team* activities, focusing on simulating attacks targeting the Company. We thus aim to try to identify our weaknesses and to improve the Company's security status.

In 2024 our main priorities are the prevention of leaks and theft of sensitive information, the availability of critical services (sales and distribution) and the control of information integrity, with an emphasis on financial information. This is complemented by the improvement of the capabilities of our cyber risk insurance programme, which provides various coverages and services, including own damage (including loss of profit), liabilities and regulatory procedures, as well as crisis management services.

In the area of corporate identity and access management, we continue working to improve oversight and internal processes with respect to management and granting of permissions, as well as privileged identity governance.

With regard to the availability of critical services, we have carried out various exercises to assess and ensure the recovery of critical systems so as to gauge and reduce the risks associated with the continuity of our systems. The infrastructure supporting these services is Tier IV certified, a standard distinguishing data centres that offer the highest level of performance and reliability, guaranteeing a high degree of availability of our infrastructure.

Training and awareness

We continue to roll out a range of projects aimed at evaluating and enhancing the level of security awareness and knowledge in the Company. We design specific actions in keeping with the level of risk associated with the various user groups, according to their profile and function. For example, we have provided cybersecurity training to the Company's international managers and the Communication department with regard to handling the communication of cybersecurity incidents. We have training programmes designed especially for the Board of Directors and we also provide specialised training for software development professionals in compliance with credit card data security requirements.

Furthermore, to address the ever-changing attack techniques, we have expanded our in-house training catalogue by introducing new training pills that tackle emerging deepfake and artificial intelligence threats. These courses explore how attackers are using AI to make their tactics more sophisticated, and therefore more convincing and harder to detect. In addition, special attention has been paid to educating particularly sensitive groups within the Company, furnishing them with the tools they need to identify and mitigate these new risks.

As in previous years, we have conducted targeted social engineering exercises, with a particular focus on *phishing* tactics, aimed at verifying and reinforcing our staff awareness of this type of attacks, which are becoming more and more frequent. In 2024 we implemented individual training programmes to more effectively boost the knowledge of our employees who have repeatedly lapsed into this kind of exercises. These programmes are designed to help individual employees enhance their ability to identify threats and improve their responses to future situations.

These initiatives have been crucial in addressing the specific training and awareness needs of the most at-risk groups. Thanks to these efforts, in 2024 we provided specialised training to nearly 5,000 users, who had the opportunity to hone their skills and knowledge in key areas, thus contributing to their personal and professional development.

We also promote security by partnering with public and private organisations:

/ We work with the NGO CyberPeace Institute, which helps vulnerable communities protect themselves and recover from cyberattacks.

/ We belong to specialised cybersecurity forums such as the Centre for Industrial Cybersecurity (CCI), the Spanish Association for the Advancement of Information Security (ISMS Forum) and the Executive Action Forum, promoted by the RSA Conference.

/ We take part in events hosted by the Retail & Hospitality Information Sharing and Analysis Center (RH-ISAC) for cybersecurity information sharing.

/ We attend renowned international cybersecurity events, such as the Security50 summits.

/ We harness professional research, guidance and advisory services from expert analysts who provide real-time support on long-term strategic needs and our short-term tactical requisites.

These collaborations enable us to keep up with the latest innovations and trends in cybersecurity, giving us an advanced perspective on developments in this area.

In summary, at Inditex we continue to devote resources to strengthening cybersecurity, as it is vital to protecting the Company's critical assets, complying with regulations, maintaining business continuity, not to mention preserving the reputation and maintaining the trust of our customers. All this fuels our ambition to stay competitive in an increasingly digital business environment. Nevertheless, we continue to strive tirelessly to improve our capabilities in this area, as we know there much remains to be done to tackle the upcoming challenges.

Additional information. Responsible risk management

Risk management and control framework

Integrated Risk Management System

Inditex's Integrated Risk Management System (IRMS) establishes the Group's risk management and control framework. The IRMS encompasses the entire Group, at both corporate level and in the various business units and subsidiaries, regardless of their geographic location. It is incorporated in our strategic planning process, in the definition of strategic goals, as well as in the Group's day-to-day operations. The IRMS entails both financial and non-financial risks (including tax, operational, technological, cybersecurity, legal/regulatory, social, environmental, climate change, political, reputational, corruption-related and other risks). We consider risk to be any potential event, regardless of its nature, that could adversely affect the achievement of business objectives.

The IRMS is based on the Enterprise Risk Management Policy and is developed and supplemented by internal regulations of different levels that govern the management of different risks and apply to different units or areas of the Group. This system coexists with other functions tasked with monitoring specific risk areas. Our IRMS is based on the COSO ERM, Enterprise Risk Management[44] methodological framework and the relevant ISO standards, adapted to our own needs and specific characteristics. The IRMS is based on scenario methodologies to assess and quantify the Group's critical risks.

Enterprise Risk Management Policy

Its purpose is to provide reasonable assurance in regard to the achievement of the strategic goals set by the Group in response to the various challenges it faces, providing all stakeholders with an adequate level of assurance to ensure the protection of the value generated. It was last modified on 10 December 2024.

ⓘ More information on our policies in section *MDR-P. Policies* of this Report or on Inditex's corporate website.

Bodies responsible for preparing and implementing the Risk Management System

In parallel, the IRMS ensures the proper segregation of duties between the various elements that comprise it. The responsibilities of the areas and bodies involved in the IRMS are based on the three-lines-of-defence model outlined below:

[44] COSO ERM Framework, Enterprise Risk Management – Integrating with Strategy and Performance, published in September 2017 by the Committee of Sponsoring Organizations of the Treadway Commission (COSO)..

Risk management

Board of Directors

Approval of the Enterprise Risk Management Policy, which establishes the basic principles, risk classes and the general framework of action for their management.

Audit and Compliance Committee

Supervision
of the risk control and management function, verifying their proper operation based on the policy approved by the Board.

Assessment
of the effectiveness of financial and non-financial risk internal control and management systems, as well as the measures planned to mitigate the impact of the risks identified.

Identification and re-assessment
at least annually, of the main financial and non-financial risks and their tolerance levels.

Risk Map
identifying the main risks by category and an assessment thereof in terms of their potential financial impact and their probability of occurrence, once the corresponding response measures have been applied.

Management

Awareness and dissemination
of the importance of the Integrated Risk Management System and its value for all the Company's stakeholders.

Definition and validation
of roles, attributions and responsibilities within the framework of the Integrated Risk Management System.

Validation of action plans
and work plans derived from the risk management process itself, and activity monitoring

Monitoring of activities
relating to risk management and the Integrated Risk Management System.

Three lines of defence

1. Business units *(continuous reporting)*

Responsibility for managing and reporting the risks to which the Group is exposed in its various areas, including those related to climate.

2. Risk management / Compliance function *(quarterly reporting)*

Tasked with: coordinating and updating the Integrated Risk Management System to maintain maximum quality standards; coordinating compliance risk management (detailed in section *G1-1. Corporate culture and business conduct*).

3. Internal Audit *(quarterly reporting)*

Independently and objectively supervising the Integrated Risk Management System.

Risk map

The risk map represents the inventory of critical risks for the Group, distributed by risk class and evaluated through a scenario methodology. There are also maps relating to specific risk categories with a higher level of granularity.

Critical risk map

	# Risks	Strong	High	Moderate	Minor
Social	4	25 %	50 %	25 %	0 %
Financial	8	50 %	0 %	50 %	0 %
Geopolitical	3	33 %	33 %	33 %	0 %
Governance	9	44 %	11 %	11 %	33 %
Environmental	4	50 %	0 %	25 %	25 %
Technology	5	20 %	60 %	20 %	0 %
Total	**33**	**39 %**	**28 %**	**28 %**	**7 %**

The main risk factors are described below, as well as their main mitigation measures and the trend with respect to the previous year.

SOCIAL RISKS
Risks arising from socio-economic trends, including evolving societal preferences, social norms and demographics, as well as the prevalence of diseases and the development of public healthcare systems.

Description and impact	Main mitigations
Human capital — Risk trend →	
Risks connected to talent and people management pertain to the necessity to adapt our organisational culture to the needs of employees in a new and complex environment, where the sustainability of human capital becomes more relevant and which seeks to ensure the quality of employment, the health and well-being of our teams, work-life balance, and diversity, among other factors. Today's labour market is becoming increasingly demanding in terms of corporate social responsibility, which determines a company's appeal as a preferred employment destination. Accordingly, the content and impact of human capital risks are evaluated every year. Furthermore, we are more exposed to the potential risk resulting from the shutdown of critical operational processes (logistics activity, transport, administrative services, among others) as a consequence of labour disputes, strike action, riots or protests that curb or disrupt corporate productivity.	/ Knowledge transfer and the involvement of all our people in our culture and way of operating. / Employees development, growth opportunities for the most talented people and retention of our key employees through career development, training and compensation policies. / Recruitment of new employees to ensure a continuous inflow of talent. / Measures to develop the Diversity and Inclusion Policy. / Development of equality plans, establishing measures to promote the commitment to and effective application of equality between men and women, preventing discrimination in the workplace, guaranteeing a healthy working environment and helping to maintain a work-life balance. / Implementation of community programmes and projects. / Fostering social dialogue at all levels. ⓘ More information in section *S1. Own workforce* of this Report.
Infectious and contagious diseases — Risk trend ↓	
This category includes the risks posed by infectious and contagious diseases. It corresponds to the potential disruption caused by a local, regional or global pandemic as a result of infectious diseases against which there is little or no pre-existing immunity in the human population. As Covid-19 has taught us, the impacts of a pandemic can be multiple, unpredictable and of varying intensity, both in time and scope. Due to their ramifications, pandemics can become a systemic risk.	/ Establishment of an information system to ensure better knowledge of the guidelines issued by public authorities and bodies. / Mechanisms aimed at guaranteeing the continuity of our operations. / Flexibility of the business model and strengthening of the online channel. / Maintenance and updating of measures established by the health authorities: creating emergency management committees, compiling data on the epidemiological situation, regular information to our teams, installing protective screens in workplaces, adapting capacity, etc. ⓘ More information in section *S1-4. Actions related to own workforce* of this Report.
Brand perception — Risk trend →	
Risks which have a direct influence on the perception of stakeholders (customers, employees, shareholders, and suppliers) and society in general regarding our Group.	/ Monitoring of the Group's image in all areas, carried out by various departments, including Communications and Institutional Relations. / Establishment of the necessary procedures and protocols by the Communications and Institutional Relations. / Management of the relationship with regulatory bodies by the General Counsel's Office – Compliance. Investor and Analyst Relations Management by the Shareholders Relations Department. / Code of Conduct. / Code of Conduct for Manufacturers and Suppliers. / Policy on Official Internet and Social Networks Accounts and Profiles. ⓘ More information in sections *SBM-2. Interests and views of stakeholders* and *A. Corporate ethical culture and solid compliance architecture* of this Report.

FINANCIAL RISKS

Threats originating in the macroeconomy, in global value chains and in industry- or company-specific events that may prevent the proposed objectives from being achieved.

Description and impact	Main mitigations
Competition	Risk trend →
The competitive environment may result in risks from difficulties in adapting to market conditions in which we operate, either in the procurement processes or in the distribution and sale of our products. These risks are inherent to the fashion retailing business and consist of our Group's potential inability to follow and respond to changes in the target market or to adapt to new situations in its sourcing or distribution countries. These risks derive from the possible difficulties involved in recognising and taking on board the ongoing changes in fashion trends, and in manufacturing, supplying and selling new articles that meet customer expectations.	/ Business model through management that seeks to improve the efficiency and effectiveness of markets, business lines and stores, rationalising and diversifying the commercial network. / Internationalisation and diversification strategy. / The Group's multi-brand format based on omni-channelling, through the full integration of channels and new technologies as alternatives for communication and sales. / Feasibility analysis of each new market, business line or store, plus subsequent follow-up. ⓘ More information in sections *3. Inditex at a glance* and *SBM-1. Strategy, business model and value chain* of this Report.
Competition may also emerge in the infringement of industrial and intellectual property.	/ Existence of an Industrial Property (IP) department to supervise the use of industrial and intellectual property rights and to protect the Group's IP assets, as well as of dedicated teams integrated in the commercial areas. / Industrial and intellectual property training. / Industrial and Intellectual Property Product Control Policy. / Code of Conduct.
Counterparty	Risk trend ↑
The Group is exposed to counterparty risk from our suppliers of goods and services, especially those that are more strategic for the continuity of our operations, as well as from our customers and business partners, which could impact the normal performance of some of our operations. The Group is also exposed to the risk that financial counterparties fail to comply with their obligations in relation to investing our liquidity, credit policies or other funding and guarantee vehicles, as well as the derivative instruments arranged to hedge financial risks.	/ Analysis and monitoring of the financial solvency of the most important third parties for the Group, including legal, technological, operational, reputational and regulatory compliance aspects, among others. Design, implementation and monitoring of the proper remediation measures arising from collaboration between the Third-party Risk Management Area and the responsible business units. / The Group Financial Investment Policy, whose aim is to ensure the safety, integrity and liquidity of the Company's financial assets. / Financial Risk Management Policy, which determines the caps on counterparty exposure. / Flexibility and diversification of the value chain ensure the resilience and continuity of our operations in the event of potential disruptions owing to the behaviour of third parties. / Creation of the Third-Party Risk Management area. ⓘ More information in section *G1-2. Management of relationships with suppliers* of this Report.

Market crisis	Risk trend →
The euro is the Group's functional currency. Our international transactions require the use of numerous currencies, giving rise to foreign currency exchange risk. Currency exposure manifests itself in terms of net investment, translation and transaction risks. We have investments overseas whose assets are exposed to the foreign currency exchange risk. Consolidating the annual accounts of our companies in euros, we are exposed to foreign exchange translation risk resulting from all our entities located outside the Eurozone. We are also exposed to the risk arising from the volatility in currencies other than the euro of payment and collection flows in relation to the acquisition and provision of goods and services in both Group and non-Group transactions.	/ Financial Risk Management Policy. ⓘ More information in *Note 26. Financial instruments and risk management policy* to the Consolidated Annual Accounts.
Supply and distribution shipping is critical to our business. There is a risk of paralysis or delay in the movement and customs clearance of goods as a result of changes in the political/social situation and stability in markets where goods are produced and sold, regulatory changes, trade frictions—whether tariff or non-tariff related, and saturation of logistics infrastructures, among others.	/ In-house teams specialised in market customs regulations, which are in permanent contact with customs agencies. / Diversification of shipping points and establishment of alternative routes. / Continuous tracking of the product until it arrives at the store. / Monitoring of relevant regulations and regulatory changes.
Economic outlook	Risk trend ↑
Our activity is subject to the risk of a potential downturn in sales as a result of economic contraction or other macroeconomic headwinds generated by external factors.	/ Flexible business model based on multi-brand omni-channelling. / Territorial diversification through an internationalisation strategy. ⓘ More information in sections *3. Inditex at a glance* and *SBM-1. Strategy, business model and value chain* of this Report.
Economic variables	Risk trend →
The Group is exposed to the risk of inflation affecting costs linked to the acquisition of the goods and services necessary to conduct our business. Notable is the impact of the increase in the price of the multiple raw materials, (textile and non-textile) consumed directly and indirectly in the Group's operations, and in the procurement of goods, primarily of our products and services, in particular in connection with the transportation of supplies and distribution. ⓘ More information in *Note 26. Financial instruments and risk management policy* and in section *E5-4. Resource inflows* of this Report.	/ Flexibility of the manufacturing and procurement model, allowing production to be adapted to market demand and to possible changes in the supply market environment. / Permanent contact with stores and online teams by our team of designers, through the Product Management department, helping them to learn about customer preferences. / Selective price adjustments to safeguard our margins. / Vertical integration of operations that enables to shorten production and delivery lead times and to reduce inventory volumes, while keeping sufficient manoeuvring room to introduce new products over the course of the season. / Monitoring of raw material markets and strategic promotion of circularity and recycling of raw materials. ⓘ More information in section *SBM-1. Strategy, business model and value chain* of this Report.

GEOPOLITICAL RISKS

Geopolitical risks arise from a deterioration in the political situation, a society's crime levels, changes in the ideology, leadership and regulation of its authorities, politically motivated conflicts at home or between nation states that threaten operations or expected prospects.

Description and impact	Main mitigations
Business environment and political instability	Risk trend ↑
Potential instability in the territories where our supply chain is located, as well as where products are marketed, poses a significant risk. Socio-political instability arising from social uprisings or other causes of political violence, as well as their potential spread to other countries, may affect our ability to operate in affected territories, with the ensuing impact on value chains, sales and expansion, or damage to our facilities. These circumstances may result in frictions that hinder the normal movement of goods due to political instability, infrastructure saturation, or constraints, especially on key routes, which generate bottlenecks due to supply-demand imbalances that limit access to transport and/or erode our margins.	/ Value chain with multiple geographic origins providing the flexibility and adaptation to demand, ensuring alternatives to the eventual need to switch between different manufacturing markets in case of severe and/or continuous disruptions. / Points of sale diversification. / Country risk monitoring and proximity to the local market. / Continuous analysis of the evolution of the conflict and its complex implications, implementing plans to mitigate its impact, especially in relation to its workforce in the affected markets. ⓘ More information in sections *3. Inditex at a glance*, *SBM-1. Strategy, business model and value chain* and *G1-2. Management of relationships with suppliers* of this Report.
Government and business policies and regulatory framework	Risk trend ↑
As a result of our extensive direct and indirect geographic presence, we are exposed to multiple and heterogeneous legislation in the countries where we operate. Regulatory changes, which are increasingly frequent and more intense, especially in our sector, as well as the possibility that local authorities might adopt different or even divergent interpretations in various jurisdictions, expose the Group to potential negative effects of a financial, compliance and/or reputational nature. This includes risks relating to labour, commercial and consumer law, industrial and intellectual property law, and personal data protection and privacy regulations, with a particular emphasis on tax and customs regulations, as well as risks pertaining to other legislation. Expectations of significant regulatory or policy changes that may create uncertainty for the normal conduct of the business model and require an effort in financial and operational planning to ensure proper adaptation.	/ Systematic tracking of the impacts and risks of the emerging regulations that affect the business model and the proposal of operable solutions. / Business model based on a firm commitment to good governance, transparency and respect, aimed at promoting social and environmental sustainability, and conveying a corporate ethical culture in the performance of all our activities. / Continuous Compliance training. / Existence of an independent body that supervises compliance with the internal standards of conduct (Ethics Committee) and a mechanism to report irregularities and non-compliances (Ethics Line). / Implementation of the model for the organisation, prevention, detection, control and management of legal and reputational risks, deriving from potential breaches. / Policy on Donations and Sponsorships, Policy on Gifts and Invitations, and Policy on Dealings with Public Servants. / Tax Policy. / Anti-Money Laundering and Terrorist Financing Policy. / Continuous assessment of the corporate governance system in order to verify its degree of compliance with and adaptation to new legislation, recommendations, standards and best practices in this respect, and to systematically reinforce good corporate governance practices. ⓘ More information in sections *Additional information. Tax responsibility and transparency* and *A. Corporate ethical culture and solid compliance architecture* of this Report.

GOVERNANCE RISK

Governance risk includes non-compliance by the Company and, in particular, by its Board of Directors and Senior Management, with the law in a formal and/or material sense, with good governance recommendations, with best practices, and with the commitments that we voluntarily undertake. It also includes risks arising from the tactical and strategic decisions of the Group's management that may result in the non-achievement of business, functional area or Group objectives, as well as risks of corruption or damage to the Company's reputation.

Description and impact	Main mitigations
Business model implementation	Risk trend ↑
Risks related to potential failures in the commercial offer by not anticipating trends, not being able to react and respond to changes in market trends, not providing sufficient supply to stores or not being able to continue to stand out from competitors.	/ Agility and flexibility of the business model. / Qualified teams focused on identifying the product demanded by the market and ensuring adequate supply management. / Availability of reliable data, with the necessary frequency and level of detail, providing information on how well supply matches demand in the market. / Linking up with customers through social media and having different touch points to capture customers' tastes and expectations (stores, online sales). / Sourcing in proximity allowing a quick response to customer demand. ⓘ More information in section *SBM-1. Strategy, business model and value chain* of this Report.
Risk of concentration of activity of logistics operations (procurement, storage and distribution) in a limited number of distribution centres, whether our own or operated by third parties, located across Spain.	/ Logistics Hub in the Netherlands. / Use of smaller logistics centres located in other countries and with third party logistics operators which carry out variable scale distribution operations. / Implementation of our WMS (Warehouse Management System) in all external logistics operators to ensure full operability and compatibility with our systems. / Our RFID and SINT (integrated stock management system) programmes have been implemented in all retail formats. / 2024-2025 Logistics Expansion Plan to meet demand. ⓘ More information in section *SBM-1. Strategy, business model and value chain* of this Report.
Non-Compliance	Risk trend →
The Group is exposed to the risk of non-compliance with its Human Rights Policy and other regulations we have established in this matter. In particular, non-compliance of our Code of Conduct for Manufacturers and Suppliers, defined as the minimum standards of ethical and responsible behaviour to be observed by the manufacturers and suppliers of the products we market. Furthermore, the demand for ESG (environmental, social and governance) behaviour in the fashion industry is increasing and is based on traceability and transparency.	/ Mandatory compliance with the Code of Conduct for Manufacturers and Suppliers by all those who wish to become part of the Group's supply chain. / Programme for compliance with the Code of Conduct for Manufacturers and Suppliers through different types of audits of the facilities required for production. / Ethics Line and Ethics Committee (also responsible for the application and interpretation of the Code of Conduct for Manufacturers and Suppliers). / Traceability strategy based on a management system whereby each supplier is required to know and share its supply chain data and report the facilities involved in the productions, and an audit process that confirms that production does in fact take place in declared and authorised factories. / The Group's commitment to transparency. We share information with our stakeholders concerning our sustainability strategy, the programmes on which is it structured, our targets and the progress achieved, among other matters. Among our main transparency drivers is our annual accountability through this Report, as well as the information we regularly publish on our corporate website. ⓘ More information in sections *GOV-4. Statement on due diligence*, *A. Corporate ethical culture and solid compliance architecture* and *G1-2. Management of relationships with suppliers* of this Report and in the section *F.1.2.* of the Annual Corporate Governance Report.

Our Group faces the risk of non-compliance with the law in a formal or material sense, or with good governance recommendations, best practices or voluntary commitments. In this regard, there is a risk of non-compliance with voluntary commitments that have been publicly undertaken, especially in the area of sustainability, which go beyond regulatory requirements. This includes risks relating to tax, customs, anti-corruption and bribery, labour law, commerce and consumption-related regulations, industrial and intellectual property regulations and risks relating to other types of legislation, in particular criminal regulatory risks, as well as other regulatory compliance risks.	/ Global Compliance Model. / Criminal Risk Prevention Model, comprising the Criminal Risk Prevention Policy, the Criminal Risk Prevention Procedure and the Criminal Risk and Control Matrix. / The main policies approved within the framework of the Criminal Risk Prevention Model are as follows: Policy on Donations and Sponsorships, Gifts and Invitations Policy, Policy on Dealings with Public Servants, Conflicts of Interest Policy, Anti-Money Laundering and Terrorist Financing Policy, Due Diligence Policy and the Procedure for Limiting Trade Relations with Suppliers in Restricted or Unauthorised Markets. / Ethics Line and Ethics Committee. ⓘ More information in section *A. Corporate ethical culture and solid compliance architecture* of this Report. / Data protection and privacy compliance model, the basic rule of which is the Compliance Policy regarding Personal Data Protection and Privacy. ⓘ More information in sections *S4-1. Policies related to consumers* and *S4-4. Actions related to consumers* of this Report. / Annual assessment of the Corporate Governance System in order to verify its degree of compliance with and adaptation to new legislation, recommendations, standards and best practices in this respect, and to systematically reinforce good corporate governance practices. / Periodic supervision by the Audit and Compliance Committee of the existence of possible conflicts of interest or transactions with/among related parties, contrary to the interests of the Company and/or its stakeholders. / Quarterly monitoring by the Sustainability Committee of the performance of commitments undertaken.
Products and services	Risk trend →
We are exposed to risks related to the quality, composition and other health and safety aspects of our products.	/ Performing controls and verifications of product health and safety standards Clear to Wear: Product Health and Safe to Wear: Product Safety. ⓘ More information in sections *E2-1. Policies related to pollution* and *S4-4. Actions related to consumers* of this Report.

ENVIRONMENTAL RISKS
Risks associated with natural disasters, climate change and the interactions resulting from human exploitation of the environment.

Description and impact	Main mitigations
Climate change	Risk trend →
Our performance is exposed to the potential impacts of climate change in its various manifestations of physical risk, whether chronic or strong, as well as to the risks resulting from the transition to a low-carbon economy. With regard to physical risks, eight climate phenomena are taken into consideration: heatwave, freeze, flash flooding, river flooding, coastal flooding, 'extratropical' and tropical storms and water stress in river basins where our own or third-party facilities are located.	/ Decarbonisation is one of the main axes of our Sustainability roadmap, in line with the goals of the Paris Agreement. We have set very ambitious decarbonisation targets for our business and for our industry as a whole. / Section *IRO-1/ SBM-3 Description of the processes to identify and assess material climate-related impacts, risks and opportunities* addresses this risk under the Task Force on Climate-related Financial Disclosures (TCFD) framework, which the Group joined in June 2020. ⓘ More information in sections *E1-6. GHG emissions* and *IRO-1/SBM-3. Material climate-related impacts, risks and opportunities* of this Report.
Environmental degradation and Scarcity of natural resources	Risk trend →
There is a risk of producing adverse effects on the environment through the release of undesirable or hazardous substances (whether biological or chemical) throughout our value chain. There is also a risk that our activities may result in negative externalities such as the loss of biodiversity, deforestation, soil degradation, or scarcity of raw materials, especially those that meet our sustainability requirements, among others. There is a need to ensure sufficient and reliable supply of lower-impact raw materials, known as preferred raw materials, to meet our sustainability commitments.	/ The Sustainability Policy sets out, among others, the environmental commitments, which are applied transversally across all its business areas and throughout the supply chain. / Environmental policies: Ecosystems and Biodiversity Policy, Water Policy and Energy Policy. / Commitment to clean energy, lower-impact raw materials and the implementation of circularity services such as Zara Pre-Owned in key markets. / Implementation of waste management systems with strict operating requirements to allow the repurposing of waste generated at our facilities through its reuse or recycling. / Forwarding for reuse and/or recycling of the packaging materials arriving at our facilities. / Research and development of new materials and production processes with a lower impact through the corporate platform Sustainability Innovation Hub. / Collaboration projects with third parties in the field of circularity and innovation (MIT Spain, Ellen MacArthur Foundation, Global Fashion Agenda, Euratex, etcetera). / Application of the Green to Wear standard in the supply chain. ⓘ More information in section *5. Environmental information* of this Report.
Extreme weather events	Risk trend →
As a result of natural disasters such as floods, fires, earthquakes, etc., key business operations and shipping processes could be halted. These events could potentially affect our critical infrastructure	/ Management of these risks, including mitigation measures and resilience plans, is discussed in the section on industrial accident risks. (Technological risks). / Section *IRO-1 / SBM-3. Material climate-related impacts, risks and opportunities* contains a sub-section concerning the physical climate impact on the Group's value chain.

TECHNOLOGY RISKS

This includes targeted cyberattacks, collapse of critical infrastructure, industrial accidents with direct or indirect impacts, as well as the inability to adapt to technological advances.

Description and impact	Main mitigations
Critical infrastructure Risk trend →	
We are more exposed to the risk arising from various contingencies (incidents, sabotage or accidents) that lead to a halt or operational inefficiency of IT services or processes needed to perform the business activity.	/ Ensuring the availability of the systems by deploying technical contingency plans which, together with associated technical recovery procedures and their relevant recovery testing, would reduce the consequences of an incident, breakdown or stoppage. / Tier IV certified main data centre, that guarantees maximum reliability and high availability. / Availability of certified data centres guaranteeing high availability as well as synchronous data storage in redundant locations or duplication of equipment and lines. / Information Security Procedure: Incident Response Plan, which includes the management of incidents involving personal data from the standpoint of compliance with personal data protection and privacy regulations. ⓘ More information in section *Additional information. Cybersecurity* of this Report.
Cybersecurity Risk trend →	
This refers to exposures that could compromise the confidentiality, integrity and/or availability of our information, regardless of whether it is located in our own systems or those of third parties; and third parties' information located in our systems. We are aware that cybersecurity risks evolve exponentially, unpredictably and, in some cases, in a very sophisticated way. Thus, although information security is a priority, there is the possibility of an undetectable attack which might affect operations or information managed by us.	/ Existence of a Chief Information Security Officer (CISO), reporting to the Chief Executive Officer and to an Information Security Committee. / Existence of a Cybersecurity Advisory Committee, an advisory and consultative body composed of independent experts tasked with strengthening the Group's decision-making in connection with cybersecurity. / Availability of a reference framework (Information Security Policy) that establishes the core principles to ensure that all employees conduct themselves in keeping with the information security goals and standards. / Update of the cybersecurity strategic plan aiming to strengthen the integral protection of our digital assets, reduce the risks associated with cyberthreats and ensure our operating resilience. / Permanent control of the Information Security Management System, ensuring the confidentiality and integrity of the information, and the availability of the systems and applications that support the sales channels. / Existence of a cyber risk insurance programme, which provides various coverages and services, including own damage (including loss of profit), liabilities and regulatory procedures, as well as crisis management services. / Updating the inventory and information technology and security risk map to establish the necessary mitigation measures and ensure continuous improvement by the responsible areas. / Renewal of certifications—both mandatory and voluntary—to analyse our alignment with best practices and standards in cybersecurity: Payment Card Industry-Data Security Standard 4.0 (PCI-DSS), ISO/IEC 27001:2022, Korean Information Security Management System (K-ISMS)[1] and Multi-Layer Protection Scheme (MLPS)[2]. / Continuous review mechanisms for the prevention, detection and response to cyberattacks. Along with the existence of the 'Information Security Incident Response Procedure' which devises the governance structure, oversight and guidelines for the detection, assessment, management and elimination of cybersecurity incidents. / Awareness and skill-building through employee cybersecurity training. ⓘ More information in section *Additional information. Cybersecurity* of this Report.

[1] K-ISMS is South Korea's information security management system. This standard is managed by the Korean Internet and Security Agency (KISA). It was prepared to evaluate whether enterprises and organisations operate and manage their information security system consistently and securely such that they protect key information assets from various threats..

[2] MLPS is the multi-layer protection scheme. It is a regulatory classification scheme intended to protect the security of information systems located in China. China's Cybersecurity Law requires the network and system components to be protected against disruptions, damage, unauthorised access using a graded scale to prevent data leakage, manipulation and espionage.

Industrial accident	Risk trend ↑
We face the risk of interruption of operations associated with the possible occurrence of extraordinary events beyond our control (fires, transport or key supplier strikes, interruptions in energy and fuel supplies, etc.), which could have a significant effect on the normal functioning of our operations. The main risks of these type are concentrated at logistics centres and at third party operators transporting goods.	/ Actions to reduce exposure to this type of risks, maintaining high levels of prevention and protection at all the distribution centres. Existence of insurance policies that cover both property damage and loss of profit resulting from the incident. / Optimisation of the scale and use of all logistics centres according to the volume of each retail format and the specific needs of the geographic area they serve. / Configuration of the various logistics centres to allow them to take over storage and delivery capacity from other centres in the event of a contingency caused by accidents or stoppages in distribution activities. / Logistics Expansion Plan. Phasing-in of Radio Frequency Identification (RFID) technology in the value chain and development of new mobile robotics technologies. / Search, validation and control of external logistics operators, at different strategic points, with full integration into the Company's logistics capacity. / Diversification of shipping suppliers. Analysis and monitoring of critical suppliers ⓘ More information in section *SBM-1. Strategy, business model and value chain* of this Report.
Disruptive technology	Risk trend →
We are aware that technological innovations and evolutions in a broad sense, both in customer interaction through the development of a satisfactory omni-channel experience, as well as the improvement of all operating and business processes, are essential to ensure fulfilment of our strategic objectives. The digital transformation process, which is paramount to ensure our competitiveness, is gaining pace due to the emergence and implementation of new technologies such as Artificial Intelligence and their application to the automation and optimisation of existing processes, or their transformative application in other spheres.	/ The digital transformation and the drive for digitalisation as a key transformation tool are evident throughout all our Group's operational and business processes. Digitalisation allows a more agile, efficient and accurate management of our operations, from logistics through to in-store operations. It also fosters sales growth by integrating channels. It ensures immediate availability and accessibility of business data, obtained thanks to our full integration, so as to continue to speed up decision-making processes, manage inventory more efficiently and improve the standard of customer services. / Digitalisation is key to the development of our sustainability strategy as, among other things, it makes it possible to manage supply chain traceability, allowing us to compile sustainability information. / Regarding people management, our digital vocation has enabled us to continue improving our operations, from recruitment processes to hiring. Digitalisation is critical when it comes to the communication and training across the world. ⓘ More information in section *SBM-1. Strategy, business model and value chain* of this Report.

The governance, availability, quality and value of the information generated in the course of our activities is increasingly becoming a competitive advantage and is essential for the normal function of the business. This information could be from different nature: transactional and operational, financial-accounting, management and budgeting and control information. We ensure the protection of information, regardless of how it is communicated, shared, projected or stored. This protection affects both the information inside the Group and the information shared with third parties. The emergence of disruptive technologies like Artificial Intelligence will be crucial in this risk area.	/ Periodic review of the management information distributed to the various managers, and investment, among other areas, in information transmission systems, data analysis and intelligence for decision-making and process optimisation, business monitoring and budgeting. / Different departments across the Group, especially the Planning and Management Control and the Administration departments, which report to the Financial Division, are directly responsible for producing and supervising the quality of this information. The Information Security Department is responsible for ensuring that this information is accessible and/or modified only by those authorised to do so, entering parameters into the systems to guarantee the reliability, confidentiality, integrity and availability of critical information. / Procedure on information Security Incident Response, which includes the management of incidents involving personal data from the standpoint of compliance with data protection and privacy regulations. ⓘ More information in sections *S4-4. Actions related to consumers* and *Additional information. Cybersecurity* of this Report. / Establishment of an Internal Risk Management and Control System in relation to the process of issuing financial information (ICFR), in order to continuously monitor and evaluate the main associated risks that allow to reasonably ensure the reliability of the Group's public financial information. ⓘ More information in the *Report on Internal Control System (ICFR)*. / Ensuring the reliability of the sustainability information supplied to the market through an internal control system (ICSR). / The Consolidated Annual Accounts and those of all the relevant companies, as well as the Consolidated Statement of Non-Financial Information and Sustainability Information, which forms part of the Management Report, are subject to verification by the external auditors. For the most significant companies, the external auditors are asked to make recommendations on internal controls. ⓘ More information in section *9. Independent Verification Report* of this Report.

Risks that materialised over the course of the year

In the year, the macroeconomic and geopolitical environment remained uncertain and complex. Operations in Ukraine, which had been suspended due to the war there since February 2022, resumed in April 2024.

Although instability in the Middle East continued, our operations were not significantly disrupted. Maritime transport between Asia and Europe continued to operate irregularly, having to avoid the Suez Canal. Consequently, transit times adapted to this new environment and its impact has not been significant. The events that suddenly shook the People's Republic of Bangladesh in August have not, so far, impacted our procurement of goods. As Bangladesh is one of the Group's procurement and manufacturing clusters, the monitoring of the evolution of conditions in the country and of third parties located there has been reinforced.

In general, inflation has continued to moderate during the year, although more slowly than initially expected by the monetary policy authorities, so the cycle of rate normalisation has also slowed. As a result, the pressure on the cost of the goods and services that we consume, as well as labour costs, eased during the year. However, spending has continued to be systematically and rigorously controlled. Economic expansion and consumption growth lived up to expectations, although some of our markets show signs of fragility mainly due to political and economic uncertainty.

The economic and geopolitical environment has generated instability and volatility in financial markets. Foreign currency risk was greatly influenced by the appreciation of the US dollar, which has affected the performance of emerging currencies. Thus the impact of exchange rates in the year was mainly concentrated on the US dollar, the Turkish lira, the Mexican peso and the Brazilian real. During 2024, fluctuations of non-euro currencies had a negative impact on the Company's sales growth and a slightly negative impact on the cost of goods sold. Foreign exchange rate risk continued to be pro-actively managed in accordance with Group guidelines based on centralising management, optimising foreign exchange exposures, maximising the benefit of diversifying the risk portfolio and monitoring risk continuously.

Although the Group has a strong cash position, we maintained our strategy aimed at guaranteeing and safeguarding the Company's liquidity. Furthermore, the Group has external sources of financing through credit facilities, mostly committed, totalling 8,446 million euros.

Once again during the course of the year our activities were impacted by different natural disasters, due this time to extreme weather phenomena in Europe and the Americas, affecting different points of sale. In particular, some of our stores remained closed due to the tragic flooding in Spain's Mediterranean coast in October. Fortunately, there were no personal injuries to our workforce. The impact of these events at the Group level was not material, either in terms of disruptions to our operations or considering the economic losses. In July there was also another sad incident in Spain affecting our workforce, when one of the buses carrying 48 employees from various Group's concepts from Barcelona to their work centres in Tordera (Barcelona province) suffered a serious accident. Although most suffered injuries of varying severity, we are happy to report that they have all made a positive recovery.

ⓘ More information in *Note 21. Net financial position* of the Consolidated Annual Accounts.

Additional information. Tax responsibility and transparency

For Inditex, **strict compliance with tax obligations in all the markets in which it operates** is a core principle of its Tax Policy. We see the application of good tax practices as an extension of our commitment to sustainability and corporate social responsibility.

Tax Policy

Approved by the Board of Directors on 9 December 2015, with the fundamental objective of the development and effective implementation of the guiding principles in tax matters included in the Tax Strategy of the Inditex Group.

It establishes our commitment to apply, in tax practices, the tax legislation of the markets in which we are present and, preferable, the interpretative criteria established by the authorities or courts of justice of those markets. Due to the heterogeneity of this regulatory framework, Inditex approaches tax management taking as a reference the standards of best practice in each territory as reference.

The management and implementation of this policy is the responsibility of the Tax department, integrated in the Group's Financial Division, and its application is mandatory for all the companies of the Group. The immediate addressees are the members of Senior Management and all employees directly or indirectly involved in the exercise of tax processes related to the tax function.

ⓘ For more information on our policies, see section *MDR-P. Policies* of this Report or the Inditex corporate website.

It is also consistent with our **philosophy of value creation** and our determination to bring about **positive social transformation** wherever we are present, as the payment of taxes, by companies and individuals, enables the economic and social development of a community. Moreover, it fosters the construction and consolidation of infrastructures and public services that benefit the well-being of citizens and society in general.

The Inditex Group is based upon a vertical organisation which takes part in all stages of the value chain of the textile industry (design, production, procurement, distribution and sale). Since all such activities are carried out in different territories, the part of profit created in the value chain attributed to each one needs to be determined. Profit attribution is done pursuant to the arm's length principle, in accordance with local regulations and OECD Transfer Pricing Guidelines.

The principles of **collaboration, mutual trust and good faith** govern Inditex's relationship with the tax authorities. Furthermore, we are part of *Foro de Grandes Empresas* ("Large Companies Forum") in Spain, whose primary objective is to promote greater collaboration among large companies and the State Taxation Administration. We also comply with the Code of Good Tax Practices promoted in this Forum, and have followed its recommendations and subsequent developments. Specifically, it is important to note that the Group has presented the Tax Transparency Report in accordance with the recommendation contained in section 2.4 of the Code.

Below is a breakdown of profit before taxes by market for 2024 (in million euros)[45] :

Markets	**2024**	**2023**
Americas	**1,176**	**1,286**
Brazil	142	167
Canada	68	80
United States	415	393
Mexico	498	541
Other	53	105
Asia & Rest of the world	**556**	**552**
Australia	22	27
China	252	241
South Korea	61	60
Japan	16	25
Kazakhstan	57	61
Other	148	138
Spain	**2,107**	**1,618**
Spain	2,107	1,618
Europe (ex-Spain)	**3,379**	**2,860**
Germany	166	130
Belgium	54	43
France	222	188
Greece	61	50
Italy	244	177
The Netherlands	700	824
Poland	98	68
Portugal	82	73
United Kingdom	179	167
Romania	103	92
Switzerland	672	525
Türkiye	526	374
Other	271	149
Profit/(loss) before taxes	**7,218**	**6,316**
Consolidation	360	554
Consolidated profit/(loss) before taxes	**7,577**	**6,870**

[45] Profit before tax results from the application of the International Financial Reporting Standards (IFRS), including the application of the accounting standard for leases IFRS16 and excludes the result of the dividend distribution of other subsidiaries of the Group, capital gains from the sale of intra-group holdings, as well as provisions for portfolio impairments in Group subsidiaries. Profit before tax is conditioned by the 'headquarters effect' and compliance with international regulations on transfer pricing (OECD Guidelines) whereby the result derived from design, supply, logistics and distribution functions is allocated to certain markets and, therefore, does not represent the Group's profitability in each market.

In 2024, the effective overall income tax rate was 22.4%, and the accrued income tax expense (in million euros) was as follows:

Markets	**2024**	**2023**
Americas	**346**	**396**
Brazil	67	76
Canada	17	21
United States	104	91
Mexico	143	164
Other	15	44
Asia & Rest of the world	**77**	**76**
Australia	9	9
China	13	11
South Korea	13	13
Japan	9	10
Kazakhstan	12	13
Other	21	20
Spain	**414**	**334**
Spain	414	334
Europe (ex-Spain)	**852**	**722**
Germany	55	35
Belgium	13	11
France	61	52
Greece	12	10
Italy	65	47
The Netherlands	239	247
Poland	17	15
Portugal	24	22
United Kingdom	27	29
Romania	17	13
Switzerland	140	107
Türkiye	135	97
Other	182	37
	1,689	**1,528**
Consolidation	(26)	(85)
Income tax[1]	**1,663**	**1,443**

(1) 2024 income tax corresponds to the obligation to pay corporate income tax, or any other, similar tax, paid in the current year, or to be paid in the following year, linked to pre-tax profit by market, in accordance with the provisions of the Information Guide on Non-Financial Information and Diversity published by the Spanish Accounting and Auditing Institute. This year, the payment obligation may be conditioned in some markets by the tax effect associated with tax losses generated in the current or previous financial years.

The relation between profit/(loss) before tax and corporate income tax in each market is obtained by applying the prevailing tax rate to the taxable income. This, in turn, is the result of performing certain permanent or temporary adjustments to the accounting profit/(loss) before tax.

These adjustments relate mainly to avoiding double taxation on income, to non-deductible expenses and to differences in the criteria for temporary allocation of income and expenditure between tax and accounting legislation (depreciation, impairment, etc.).

The Group is committed to not using structures of a shady nature for tax purposes, putting shell companies located in territories considered as tax havens or uncooperative territories by the Spanish tax authorities. In this regard, and according to the Spanish normative in place in fiscal year 2024, the Group does not develop commercial activities in territories considered as tax havens.

This financial year, taking into account all the markets in which it operates, the Group has received three million euros (four million euros in the previous year) in public subsidies, mainly from China.

Likewise, section *G1-3. Prevention and detection of corruption and bribery* of this Report, sets out the measures that Inditex has adopted within the framework of stopping money laundering and the financing of terrorism.

In the financial year 2024, and in compliance with our tax obligations, Inditex's total tax contribution amounted to 9,341 million euros, of which 4,125 million euros were direct taxes paid and 5,216 million euros were taxes collected on behalf of third parties in the territories and markets where the Company operates. In order to standardise the tax disclosures and denominations of these territories, PwC's Total Tax Contribution methodology is used. In it, taxes are divided into five categories:

/ **Income tax.** This includes tax payable on profits earned by companies (such as corporate income tax or business tax), as well as taxes collected and some withholdings on payments to third parties.

/ **Property tax.** Tax payable on the ownership, sale, transfer or occupation of property.

/ **Personal tax.** Tax related to employment, paid and collected. This includes employees' personal income tax withholdings or social security contributions payable by the employee or the Company.

/ **Tax on products and services.** Indirect taxes on the production and consumption of goods and services, such as VAT or customs duties, among others.

/ **Environmental tax.** Duties relating to the supply, use or consumption of products and services that, in one way or another, affect the environment.

Category	Direct tax (in million euros)	Taxes collected (in million euros)
Income tax	1,701	255
Property tax	102	13
Personal tax	959	1,075
Tax on products and services	1,337	3,873
Environmental tax	26	0
Total	**4,125**	**5,216**

Total tax contribution (in million euros)	**9,341**

In 2024, Inditex total tax contribution was 9,341 million euros, corresponding to Spain 2,243 million euros, which represents a 24% of the total. This percentage, much higher to the one that represents the sales of Spain (15%), is consequence of the 'headquarters effect' associated to the development in Spain of the design and distribution of products at a global level activities.

Tax contribution

9,341 M€
total tax contribution

4,125 M€
direct taxes

5,216 M€
collected taxes

2,243 M€
Spain

2024 Taxes	Dir*	Coll**
Total	**1,122**	**1,121**

5,103 M€
Europe (ex-Spain)

2024 Taxes	Dir*	Coll**
Germany	77	372
Belgium	28	137
France	200	552
Greece	31	181
Italy	142	522
The Netherlands	282	139
Poland	22	160
Portugal	61	273
United Kingdom	139	259
Romania	17	117
Switzerland	120	22
Türkiye	435	173
Other	174	468
Total	**1,728**	**3,375**

1,509 M€
Americas

2024 Taxes	Dir*	Coll**
Brazil	174	132
Canada	76	45
United States	324	210
Mexico	377	122
Other	30	20
Total	**980**	**529**

486 M€
Asia and rest of the world

2024 Taxes	Dir*	Coll**
Australia	23	23
China	39	74
South Korea	44	13
Japan	45	36
Kazakhstan	31	12
Other	113	33
Total	**295**	**191**

* Direct taxes
** Collected taxes

	Direct taxes paid (in million euros)		Taxes collected (million euros)	
Markets	**2024**	**2023**	**2024**	**2023**
Americas	**980**	**985**	**529**	**511**
Brazil	174	168	132	115
Canada	76	97	45	51
United States	324	333	210	198
Mexico	377	335	122	123
Other	30	52	20	24
Asia & Rest of the world	**295**	**292**	**191**	**210**
Australia	23	17	23	26
China	39	57	74	84
South Korea	44	40	13	17
Japan	45	37	36	38
Kazakhstan	31	30	12	10
Other	113	111	33	35
Spain	**1,122**	**1,048**	**1,121**	**1,183**
Spain	1,122	1,048	1,121	1,183
Europe (ex-Spain)	**1,728**	**1,335**	**3,375**	**3,116**
Germany	77	36	372	357
Belgium	28	31	137	130
France	200	166	552	503
Greece	31	17	181	169
Italy	142	99	522	485
The Netherlands	282	289	139	151
Poland	22	21	160	149
Portugal	61	31	273	251
United Kingdom	139	132	259	269
Romania	17	13	117	102
Switzerland	120	126	22	20
Türkiye	435	266	173	109
Other	174	108	468	421
Own taxes	**4,125**	**3,660**	**5,216**	**5,020**

8. Annexes

8.1. Methodological Annex

8.2. Content Indexes



Methodological Annex

E1. Climate change

Targets (MDR-T)

Target	Related metrics	Scope	Methodology	Change of criterion/ methodology
Reaching net-zero GHG emissions by 2040	Scope 1, 2 and 3 emissions.	Own operations: Reduce scope 1 and 2 GHG emissions by 95% (market-based). Value chain: Reduce scope 3 GHG emissions by 90%. It includes the following categories: purchased goods and services (category 1), fuel- and energy-related activities (category 3), upstream transportation and distribution (category 4), waste generated in operations (category 5), business travel (category 6), employee commuting (category 7), end-of-life treatment of sold products (category 12), downstream leased assets (category 13) and franchises (category 14).	/ We calculate and report GHG emissions in accordance with the guidelines of the Intergovernmental Panel on Climate Change (IPCC - Guidelines for National Greenhouse Gas Inventories, 2006) and the World Resources Institute (GHG Protocol, 2015), which divide emissions into scopes 1, 2 and 3. / The reported GHG emissions are calculated in accordance with our Company's operating control approach and include CO_2, CH_4, N_2O, HFCs, PFCs, SF_6, and NF_3 gases, which are expressed in units of CO_2 equivalent (CO_2eq). / The base year was chosen in accordance with SBTi's criteria for the completeness, verification, representativeness and ambition of the emissions inventory. /Absolute and voluntary target. /See details of the methodology for calculating emissions in the Metrics table.	There have been no changes to the target. See the emissions calculation methodology in the Metrics table to identify changes in the calculation methodology. The historical data has been recalculated to make the results comparable year on year.
Reduce our total emissions by at least 53% by 2030	Scope 1, 2 and 3 emissions.	Own operations: Reduce scope 1 and 2 GHG emissions by 95% (market-based). Value chain: Reduce scope 3 GHG emissions by 51%. It includes the following categories: purchased goods and services (category 1), fuel- and energy-related activities (category 3), upstream transportation and distribution (category 4), waste generated in operations (category 5), business travel (category 6), employee commuting (category 7), end-of-life treatment of sold products (category 12), downstream leased assets (category 13) and franchises (category 14).	/ We calculate and report GHG emissions in accordance with the guidelines of the Intergovernmental Panel on Climate Change (IPCC - Guidelines for National Greenhouse Gas Inventories, 2006) and the World Resources Institute (GHG Protocol, 2015), which divide emissions into scopes 1, 2 and 3. / The reported GHG emissions are calculated in accordance with our Company's operating control approach and include CO_2, CH_4, N_2O, HFCs, PFCs, SF_6 and NF_3 gases which are expressed in units of CO_2 equivalent (CO_2eq). / The base year was chosen in accordance with SBTi's criteria for the completeness, verification, representativeness and ambition of the emissions inventory. /Absolute and voluntary target. /See details of the methodology for calculating emissions in the Metrics table.	There have been no changes to the target. See the emissions calculation methodology in the Metrics table to identify changes in the calculation methodology. The historical data has been recalculated to make the results comparable year on year.

Metrics (MDR-M)

Description	Metric	Scope	Methodology	Information source	Change of criterion/methodology
Energy consumption (amount of energy consumed)	E1-5_01, E1-5_02, E1-5_03, E1-5_04, E1-5_05, E1-5_06, E1-5_07, E1-5_08, E1-5_09, E1-5_10, E1-5_11, E1-5_12, E1-5_13, E1-5_14, E1-5_15, E1-5_16, E1-5_17	Own operations: All headquarters, own factories, own logistics centres, e-commerce centres (operational control) and own stores are included.	Total energy consumption is calculated by aggregating the various kinds of consumption (acquired electricity, heat, steam, and cooling; renewable and non-renewable fuels; self-generated energy). When complete information is not available for the period to be reported, an estimate of the remaining period is made based on primary data.	Primary data: 72% Estimated data: 28%	The scope has been extended to include e-commerce distribution centres where operational control is held. The fuel consumption of own stores has been included. The figures from previous years have been recalculated to ensure the transparency and comparability of the data.
Net sales	E1-6_33, E1-6_34, E1-6_35	Own operations: All the companies that form part of the Inditex Group.	Data reported in *Note 4* of the Consolidated Annual Accounts of the Inditex Group.	Primary data: 100%	Not applicable.

Emissions calculation

Description	Metric	Scope	Methodology	Information source	Emission factor	Change of criterion/ methodology
Scope 1 emissions (direct emissions related to sources under the direct control of the Inditex Group)	E1-4_01, E1-4_03, E1-4_04, E1-4_18, E1-4_21, E1-4_25, E1-6_01, E1-6_03, E1-6_04, E1-6_07, E1-6_08, E1-6_15	Own operations: All headquarters, own factories, own logistics centres, e-commerce centres (operational control) and own stores are included.	Scope 1 emissions are calculated based on total fuel consumption. Total consumption is multiplied by the corresponding emission factor, depending on the type of fuel. For facilities located in Spain, the emission factors of MITECO (Ministerio para la Transición Ecológica y el Reto Demográfico) are used, and for the rest, those of DEFRA (Department for Environment, Food & Rural Affairs) are used.	Primary data: 96% Estimated data: 4%	DEFRA (Department for Environment Food & Rural Affairs), 2024. MITECO (Ministerio para la Transición Ecológica y el Reto Demográfico), 2023.	The scope has been extended to include e-commerce distribution centres where operational control is held. Fuel consumption and fugitive emissions from own stores have been included. The figures from previous years have been recalculated to ensure the transparency and comparability of the data.
Scope 2 emissions (market-based) (Indirect emissions, associated with the generation of electricity, heating, steam and cooling acquired and consumed by the Inditex Group)	E1-4_01, E1-4_03, E1-4_04, E1-4_18, E1-4_21, E1-4_25, E1-6_01, E1-6_03, E1-6_04, E1-6_10, E1-6_13, E1-6_15, E1-6_18, E1-6_21, E1-6_22, E1-6_31	Own operations: All headquarters, own factories, own logistics centres, e-commerce centres (operational control) and own stores are included.	Emissions associated with purchased electricity are calculated by multiplying electricity consumption by the corresponding emission factor, depending on the source of the energy and/or the market where the facility is located. For renewable energy, the emission factor of the corresponding contractual instrument is used (PPA, I-REC, GO, etc.). Otherwise, International Energy Agency (IEA) emission factors are used. For heating, steam and cooling acquired, the total consumption is multiplied by the corresponding emission factor. In this case, DEFRA (Department for Environment, Food & Rural Affairs) emission factors are used.	Primary data: 68% Estimated data: 32%	Market-based method: / Contractual instruments for renewable energy (PPA, EACs, etc.). / DEFRA (Department for Environment Food & Rural Affairs), 2024.	The scope has been extended to include e-commerce distribution centres where operational control is held. This includes the purchase of heating, cooling and steam. The figures from previous years have been recalculated to ensure the transparency and comparability of the data.

Description	Metric	Scope	Methodology	Information source	Emission factor	Change of criterion/ methodology
Scope 2 emissions (location-based) (Indirect emissions, associated with the generation of electricity, heating, steam and cooling acquired and consumed by the Inditex Group)	E1-4_01, E1-4_18, E1-4_21, E1-4_25, E1-6_09, E1-6_12, E1-6_15, E1-6_30	Own operations: All headquarters, own factories, own logistics centres, e-commerce centres (operational control) and own stores are included.	Emissions associated with purchased electricity are calculated by multiplying electricity consumption by the corresponding emission factor, depending on the market where the facility is located. International Energy Agency (IEA) emission factors are used. For heating, steam and cooling acquired, the total consumption is multiplied by the corresponding emission factor. In this case, DEFRA (Department for Environment, Food & Rural Affairs) emission factors are used.	Primary data: 68% Estimated data: 32%	Location-based method: / IEA (2024), Emission Factors. / DEFRA (Department for Environment Food & Rural Affairs), 2024.	The scope has been extended to include e-commerce distribution centres where operational control is held. This includes the purchase of heating, cooling and steam. The figures from previous years have been recalculated to ensure the transparency and comparability of the data.
Scope 3 emissions (Other indirect emissions related to the production chain of goods and services, their distribution and marketing outside the Company).	E1-4_01, E1-4_02, E1-4_15, E1-4_16, E1-4_18, E1-4_21, E1-4_25, E1-6_01, E1-6_03, E1-6_04, E1-6_11, E1-6_15, E1-6_25, E1-6_26	Value Chain.	Details below for each Scope 3 category:	Primary data: 42% Estimated data: 58%	Details below for each Scope 3 category:	Details below for each Scope 3 category:
			Category 1: Purchased goods and services: - Raw materials extraction: This category is calculated on the basis of raw materials consumption data. Depending on the type of raw material, the relevant emission factor is applied (Higg Materials Sustainability Index - MSI). - Production processes: Emissions are calculated based on the energy consumption of the factories in the supply chain, the factory's production for Inditex (in kg) and the corresponding emission factor. For those factories for which no actual consumption data is available, it will be estimated using factories emissions calculated based on the primary data and the factory's production for Inditex.		Higg Materials Sustainability Index (MSI), 2024. IEA (2024), Emission Factors. DEFRA (Department for Environment Food & Rural Affairs), 2024.	The methodology for emissions associated with production processes has been modified, replacing the secondary data with primary data. The figures from previous years have been recalculated to ensure the transparency and comparability of the data.
			Category 2: Capital goods: Emissions are calculated based on investment in property, plant and equipment, applying the corresponding emission factor according to the type of investment and the market in which it is made. The emission factors used are provided by Risilience, academic partner of the University of Cambridge's Centre for Risk Studies.		Risilience, academic partner of the University of Cambridge's Centre for Risk Studies.	Not applicable.
			Category 3: Fuel-and energy-related activities: For the calculation of this category, it is used the energy consumption from Scopes 1 and 2. According to the energy source and its origin, the corresponding emission factor is applied.		IEA (2024), Emission Factors Package. DEFRA (Department for Environment Food & Rural Affairs), 2024.	The scope has been extended to include e-commerce distribution centres where operational control is held. This includes fuel consumption and the purchase of heating, cooling and steam. The figures from previous years have been recalculated to ensure the transparency and comparability of the data.

Description	Metric	Scope	Methodology	Information source	Emission factor	Change of criterion/ methodology
			Category 4: Upstream transportation and distribution: These emissions are calculated based on the tonnes, distance and means of transport used to distribute our products. GLEC (Global Logistic Emissions Council Framework for Logistics Emissions Accounting and Reporting) emission factors are used.		GLEC, Global Logistic Emissions Council Framework for Logistics Emissions Accounting and Reporting.	The granularity of the information has been enhanced and primary data was included. We have updated the version of emission factors. The figures from previous years have been recalculated to ensure the transparency and comparability of the data.
			Category 5: Waste generated in operations: To calculate this category, we use the waste generated datain own operations. According to the type of waste and its final destination, we use the corresponding emission factor (DEFRA - Department for Environment Food & Rural Affairs).		DEFRA (Department for Environment Food & Rural Affairs), 2024.	The scope has been extended to include e-commerce distribution centres where operational control is held and waste generated in own stores and their refurbishments. The figures from previous years have been recalculated to ensure the transparency and comparability of the data.
			Category 6: Business travel Emissions in this category are calculated according to means of transport, class of ticket and distance travelled by employees of the Spanish subsidiaries. The emission factors applied are those proposed by DEFRA (Department for Environment Food & Rural Affairs). Emissions are extrapolated to the rest of the subsidiaries based on the breakdown of travel expenditure by market.		DEFRA (Department for Environment Food & Rural Affairs), 2024.	Not applicable.
			Category 7: Employee commuting Their calculation involves estimating average distances covered by means of transport and commuting patterns based on bibliographic research. DEFRA (Department for Environment, Food & Rural Affairs) emission factors are used		DEFRA (Department for Environment Food & Rural Affairs), 2024.	Not applicable.
			Category 8: Upstream leased assets (emissions associated with third-party assets leased by Inditex). Emissions associated with third-party assets leased by Inditex are immaterial.		Not applicable.	Not applicable.
			Category 9: Downstream transportation and distribution (emissions from the downstream transportation and distribution of sold products). Not reported. Inditex is working on improving the internal corporate systems to provide this information with the degree of detail required		Not applicable.	Not applicable.
			Category 10: Processing of sold products (emissions from the subsequent transformation of sold products). Not applicable. Products sold do not require transformation to be used by our customers.		Not applicable.	Not applicable.

Description	Metric	Scope	Methodology	Information source	Emission factor	Change of criterion/ methodology
			Category 11: Use of sold products (estimated emissions from the use of products sold by Inditex). Their calculation takes into account the energy consumed during the use phase based on bibliographic research. International Energy Agency (IEA) emission factors are used.		IEA (2024), Emission Factors. Higg Product Module methodology, June 2021.	Including the direct use of sold products. The figures from previous years have been recalculated to ensure the transparency and comparability of the data.
			Category 12: End-of-life treatment of products sold (emissions generated from the final disposal of products sold by the Company.) To calculate these emissions, the final destination of our products and packaging is estimated. DEFRA (Department for Environment, Food & Rural Affairs) emission factors are used.		DEFRA (Department for Environment Food & Rural Affairs), 2024.	The bibliographic studies have been updated with more recent and more granular research. The figures from previous years have been recalculated to ensure the transparency and comparability of the data.
			Category 13: Downstream leased assets (emissions from Inditex-owned assets leased to third parties). Emissions from downstream leased assets are calculated based on energy consumption and its corresponding emission factors.		MITECO (Ministerio para la Transición Ecológica y el Reto Demográfico), 2023.	Not applicable.
			Category 14: Franchises (emissions from franchisees during the operation of franchises). Emissions from franchised stores are estimated based on the consumption of own stores.		IEA (2024), Emission Factors. DEFRA (Department for Environment Food & Rural Affairs), 2024.	Fuel and coolant consumption has been included. The figures from previous years have been recalculated to ensure the transparency and comparability of the data.
			Category 15: Investments. Not applicable.		Not applicable.	Not applicable.
Biogenic emissions (scope 1 and 3)	E1-6_17, E1-6_28	Scope 1: Own operations. Scope 3: Value chain.	Biogenic emissions are calculated based on the total consumption of biofuels. Total consumption is multiplied by the corresponding emission factor, depending on the type of biofuel.	Scope 1: Primary data: 46%, Estimated data: 54% Scope 3: Primary data: 67%, Estimated data: 33%	DEFRA (Department for Environment Food & Rural Affairs), 2024.	Not applicable.

Financial impact of climate-related risks: model assumptions

Related Metrics E1-9_10, E1-9_11, E1-9_18, E1-9_19

Physical risk

Type of risk	Model assumptions
Acute	/ Each key facility is assigned a degree of dependence and contribution to Group revenues commensurate with its participation in our value chain. The scale of the disruption translates into the corresponding loss of income. / Extreme weather events are modelled independently, assuming that they are not correlated. / The current portfolio of key facilities is considered to remain static over the five years of projected impact. / The vulnerability functions of key facilities have been parametrised on the basis of expert knowledge grounded on empirical data. The functions are homogeneous for all geographies. For a limited group of especially important assets, specific recovery curves are applied. Work is underway to develop specific curves for other asset types.
Acute and Chronic	/ The risk of disruption to market demand is parametrised for three types of extreme weather events: heat wave, drought and freeze (other threats that affect limited areas and whose impact should not be material, such as storms, are not considered). / Each product category is assigned a vulnerability function for various severity levels. These functions determine the severity of changes in demand.
Chronic	/ In the analysis of agricultural risks, for each crop type the impact on yield was modelled in accordance with a range of variables (precipitation patterns and shortage, temperature variations, extreme temperature, etc.). / Crop vulnerability functions are parametrised using the FAO (Food and Agriculture Organization) and Ecocrop databases to determine the suitability of a specific environment by optimal conditions for the growth of the various crops. / To estimate the financial impacts (decrease in sales or increase in supply costs), the level of dependence on the different raw materials analysed at the commercial format and Group level is considered. / The Group's dependence on the raw materials analysed is considered to be static over the five years of projected impact.

Transition risk

Type of risk	Model assumptions
Regulatory	/ The scenario applies greenhouse gas (GHG) emissions in accordance with production, defined as fossil fuel consumption in the country for the industrial production of goods and services, as well as energy generation. / All emissions are subject to a carbon price. The price for different economic sectors is given separately. / The increased costs associated with carbon price mechanisms are transmitted through the Group's routine overheads, i.e. its general expenses, distribution expenses and raw materials costs. / No incentives or benefits either financial or fiscal for carbon price revenue are considered. Public authorities earmark most of the revenue for green expenditure, whose economic benefits are not factored into this model. / Suppliers are assumed to pass on 100% of their cost increases to us. The Group passes on a portion of these to its end customers.
Legal liability	/ The model uses a decision tree to evaluate a range of potential outcomes, each with a probability of occurrence and leading to different impacts. The model harnesses historical data from other sectors that serve as a 'benchmark' and experts' opinions, all based on the company's specific characteristics. The model's output is the estimated financial impact given the conditional probability of each outcome.
Technology	/ This model considers the costs to the Company of investing in low-emission technologies and boosting the efficiency of operating assets, as well as distribution costs. Improvements to assets include new transportation assets (trucks and so on), as well as the modernisation of factories to improve their energy efficiency. For each technology, the model assumes that a portion of the total global assets are updated according to the various emissions pathways at a specific cost. / The costs of technological improvements are compared with current average unit costs. The model takes into account basic balance sheet data in connection with the Group's buildings, facilities and equipment. Key supply chain facilities are also considered. The model assumes that the Group carries out technology upgrades at key facilities and in the Group's vehicle fleet.
Market	/ Market adoption rates for sustainable products have been parameterized in the model based on a number of key attributes (market potential, innovation coefficient and imitation coefficient). / The Group's product portfolio remains static over the different time horizons. Sales of sustainable products grow moderately in the short term. It is assumed that the potential size of sustainable products does not cover all consumers, although the level of adoption varies according to the level of ambition of the different trajectories. / The model considers that changes in consumption patterns affect every sector. The Group has some ability to pass on part of the losses to the customer. / The impact on consumer demand is assumed to outweigh the impact on investors, as the market remains focused on sectors with higher emissions.
Reputation	/ Two key factors define the model: the change in our customers' preferences towards more sustainable products and the level of activism among consumers. The model considers two opposing trends. On the one hand, activism, which increases inversely to the level of ambition: the lower the ambition, the more activism there is. On the other hand, consumers' preference for more sustainable products, which is greater in more ambitious pathways, thereby reducing the demand for conventional products.

E2. Pollution

Metrics (MDR-M)

Description	Metric	Scope	Methodology	Information source	Change of criterion/methodology
Degree of compliance with the Picking programme	MDR-A_05 (E2)	Own operations (our products): Articles produced in the summer and winter campaigns of the reporting period.	/ The initial degree of compliance is calculated as the ratio of the number of items meeting each of the Group's standards (CtW, PTR, StW) to the total number of items in the summer/winter campaigns of the reporting year. / The information used for this calculation is obtained from laboratory analyses as part of the product health and safety control procedure.	Primary data: 100%	Not applicable.

E3. Water resources

Targets (MDR-T)

Target	Related metrics	Scope	Methodology	Change of criterion/methodology
25% reduction in water consumption in the supply chain by 2025	E3-3_08, E3-4_01, E3-4_10	Value chain: Facilities that carry out any type of wet process in the Inditex supply chain, except for the production of raw materials.	/ Relative and voluntary target. / See calculation methodology in the Metrics table.	No changes were made to the methodology with respect to the previous year, but consumptions for the base year were recalculated in consideration of the improvements in corporate systems that provide greater detail of the production processes.

Metrics (MDR-M)

Description	Metric	Scope	Methodology	Information source	Change of criterion/ methodology
Water consumption throughout the supply chain	E3-4_10	Value chain: Facilities that carry out any type of wet process in the Inditex supply chain, except for the production of raw materials.	We calculate the water consumption of each of the facilities that carry out wet processes intervening in the manufacturing of the Group's textile and footwear products, based on the total production of each factory (in kg) and the relative consumption (l/kg) of each facility. This data is compiled from our factories (for example, in environmental audits). For those facilities for which we do not have information, consumption is estimated based on the actual data from the rest of the facilities. The ratio is calculated by dividing the total litres by the total kg produced for Inditex.	Primary data: 94% Estimated data: 6%	No changes were made to the methodology with respect to the previous year, but consumptions for 2023 and the base year were recalculated in consideration of the improvements in corporate systems that provide greater detail of the production processes.

E4. Biodiversity and ecosystems

Targets (MDR-T)

Target	Related metrics	Scope	Methodology	Change of criterion/ methodology
Protect, restore or regenerate 5 million hectares by 2030	E4-4_01, E4-4_02, E4-4_03, E4-4_04, E4-4_07, E4-4_08, E4-3_15	Value chain geographies, as well as regions outside the value chain identified as important areas of action by our conservation partners.	/ The sum of hectares under protection, restoration, regeneration and other types of improvement in different phases of implementation is calculated: – Committed: initial phase of community outreach, awareness and engagement. This phase includes establishing the baseline for measuring progress. – In process: phase of implementation of the activities and measurement and monitoring of the results. – Advanced: phase in which positive trends are observed. / The information on the hectares reached comes from the various organisations with whom we implement the projects. / When Inditex is not the sole investor in a project, the surface area will be allocated based on the proportional contribution of each party. / In establishing our target, we did not apply ecological thresholds due to the traceability difficulties posed, nor considering offsets in setting the target. / Absolute and voluntary target / The establishment of a base year does not apply to this target.	There have been no changes to the target.

E5. Resource use and circular economy

Targets (MDR-T)

Target	Related metrics	Scope	Methodology	Change of criterion/ methodology
Fibres Plan: use of 100% lower-impact fibres by 2030	E5-3_13	Textile fibres used in our products in the winter campaign. In addition, certain non-fibres such as leather and polyurethane are included.	/ See table 'sustainability metrics for the classification of lower-impact raw materials'. / Measured in tonnes of lower-impact raw materials. / Absolute and voluntary target. / The establishment of a base year does not apply to this target. / The consumption of raw materials is calculated based on the garment's weight, the units of each article and its percentage composition. (The figure includes the raw material used in the final product; it does not include any wastage that may have occurred during the production process).	There have been no changes to the target or its calculation methodology, so the results are comparable year-on-year.
Provide circularity services such as Zara Pre-owned in key markets by 2025	E5-2_05, E5-3_13	Service provided by the Inditex Group to its customers.	/ Key markets for the implementation of the project are compiled. / Absolute and voluntary target. / The establishment of a base year does not apply to this target.	There have been no changes to the target or its calculation methodology, so the results are comparable year-on-year.

Metrics (MDR-M)

Description	Metric	Scope	Methodology	Information source	Change of criterion/ methodology
Product composition	E5-4_02, E5-4_03, E5-4_04, E5-4_05, E5-4_06	Own operations (our products): All the items from the winter and summer campaigns of the reporting year offered for sale.	The consumption of raw materials is calculated based on the garment's weight, the units of each article and its percentage composition. The figure includes the raw material used in the final product; it does not include any wastage that may have occurred during the production process.	Primary data: 100%	Not applicable
Composition of packaging	E5-4_04, E5-4_06	Own operations and value chain: All the packaging elements from the reporting year placed on the market.	For each item of clothing, we obtain the packaging details for the three different inflows and outflows (inflow to warehouse, inflow to store and outflow to customer). This is then used to categorise the materials as plastic, paper and cardboard and other.	Primary data: 11% Estimated data: 89%	Not applicable
Waste generated	E5-5_06, E5-5_07, E5-5_08, E5-5_09, E5-5_10, E5-5_11, E5-5_15, E5-5_17	Own operations: Headquarters, own factories, own logistics centres, e-commerce centres (operational control) and own stores.	The waste generated is calculated based on the data collected at our facilities. When there is no available data, we extrapolate from the primary data.	Primary data: 40% Estimated data: 60%	The scope has been extended to include e-commerce distribution centres where operational control is held.

Sustainability metrics for the classification of lower-impact raw materials:

Metric	Description
Impact analysis	Using a Life Cycle Analysis (LCA) methodology, the sustainability of a fibre or material is evaluated.
Traceability	It is essential to have a robust, operational and scalable traceability system for fibre and material throughout the supply chain.
Standards and certifications	Fibres or materials must comply with the third-party best practice standards and require third-party certification or external verification to ensure their compliance. The Fibres Plan includes the standards developed by the Textile Exchange, Canopy, Changing Markets and the Leather Working Group, among others. The full list of accepted standards under our Fibres Plan is included below.
Fibre suppliers assessment	Assessment of the different fibre suppliers considering the associated environmental, social and regulatory risks. Work is underway to deploy this process in corporate systems.

List of certified lower-impact raw materials

NAME OF MATERIAL (Generic)	CLASSIFICATION
Steel	Responsible Steel
Acetate	MMCF - innovative fibres
	MMCF - other third-party standards (Canopy, Changing Markets/FSC)
	Recycled MMCF (RCS/GRS)
Acrylic	Recycled acrylic (RCS/GRS)
Acrylonitrile butadiene styrene	Recycled acrylonitrile butadiene styrene (RCS/GRS)
Alcohol	Organic alcohol (Cosmos organic)
Cotton	In conversion/transitional cotton (OCS/GOTS)
	Organic cotton (OCS/GOTS)
	Recycled cotton (RCS/GRS)
	Cotton from regenerative practices (Regenagri)
Aluminium	Recycled aluminium (RCS/GRS)
Bamboo	Bamboo (FSC 100%)
Cashmere	Recycled cashmere (RCS/GRS)
Hemp	Organic hemp (OCS/GOTS)
	Hemp - innovative fibres
Cardboard	Recycled cardboard (FSC Recycled/RCS/GRS)
Rubber	Recycled rubber (FSC Recycled/RCS/GRS)
Wax	Organic wax with palm oil (RSPO/Soil Association Organic Standards - Health & Care beauty products)
	Organic wax without palm oil (Soil Association Organic Standards - Health & Care beauty products)
Ceramics	Recycled ceramics (RCS/GRS)
Copper	Recycled copper (RCS/GRS)
	Responsible copper (The Copper Mark)
Cellulose diacetate	Recycled cellulose diacetate (RCS/GRS)
Elastane	Recycled elastane (RCS/GRS)
Elastomultiester	Recycled elastomultiester (RCS/GRS)

NAME OF MATERIAL (Generic)	CLASSIFICATION
Styrene butadiene styrene	Recycled styrene butadiene styrene (RCS/GRS)
Ethyl Vinyl Acetate	Recycled Ethyl Vinyl Acetate (RCS/GRS)
Plant fibre	Plant fibre - innovative fibres
Iron	Responsible iron (Responsible steel)
Wool	Recycled wool (RCS/GRS)
	Responsible wool (RWS)
Latex	Recycled latex (FSC Recycled /RCS/GRS)
Brass	Recycled brass (RCS/GRS)
Linen	European linen (European Flax certificate)
	Organic linen (OCS/GOTS)
	Recycled linen (RCS/GRS)
Lyocell	MMCF - innovative fibres
	MMCF - other third-party standards (Canopy/ Changing Markets/FSC)
	Recycled MMCF (RCS/GRS)
Wood	Recycled wood (FSC Recycled)
Methacrylate	Recycled methacrylate (RCS/GRS/Eucertplast/ Recyclass/ISCC Plus)
Metal	Recycled metal (RCS/GRS)
Modal	MMCF - Other third-party standards (Canopy/ Changing Markets/FSC)
Paper	Recycled paper (FSC Recycled/RCS/GRS)
PCTG	PCTG (RCS/GRS/Eucerplast/Recyclass/ISCC Plus)
	Recycled PCTG - innovative fibres
PEVA	Recycled PEVA (RCS/GRS)
Leather	Leather (Leather Working Group)
	Bonded leather fibers (GRS/RCS)
Silver	Recycled silver (RCS/GRS/RJC)
Feather	Recycled feather (RCS/GRS)
	Responsible feather (RDS)

NAME OF MATERIAL (Generic)	CLASSIFICATION
Down	Recycled down (RCS/GRS)
	Responsible down (RDS)
Polyamide	Polyamide - innovative fibres
	Recycled polyamide (RCS/GRS/REPREVE)
Polycarbonate	Recycled polycarbonate (RCS/GRS/Eucertplast/ Recyclass/ISCC Plus)
Polyester	Polyester - innovative fibres
	Recycled polyester (RCS/GRS/REPREVE/ Eucertplast/Recyclass/ISCC Plus)
Polystyrene	Recycled polystyrene (RCS/GRS/Eucertplast/ Recyclass/ISCC Plus)
Polyethylene	Recycled polyethylene (RCS/GRS/Eucertplast/ Recyclass/ISCC Plus)
PET	Recycled PET (RCS/GRS/Eucertplast/Recyclass/ ISCC Plus)
Polymethyl methacrylate	Recycled polymethyl methacrylate (RCS/GRS/ Eucertplast/Recyclass/ISCC Plus)
Polypropylene	Recycled polypropylene (RCS/GRS/Eucertplast/ Recyclass/ISCC Plus)
Polyurethane	Recycled polyurethane (RCS/GRS)
Thermoplastic polyurethane	Recycled thermoplastic polyurethane (RCS/GRS)
Rattan	Rattan (FSC 100%)
Glass	Recycled glass (RCS/GRS)
Viscose	MMCF - innovative fibres
	MMCF - other third-party standards (Canopy/ Changing Markets/FSC)
	Recycled MMCF (RCS/GRS)
Zinc	Recycled zinc (RCS/GRS)

S1. Own workforce

Targets (MDR-T)

Target	Related metric	Scope	Methodology	Change of criterion/methodology
To double the number of people with disabilities by 2024	S1-12_01, S1-12_02	The entire Group.	/ The total number of people with disabilities in the current year is compared with the total number in the base year. The calculation methodology is reported in the Metrics Table below. / Absolute and voluntary target.	There have been no changes to the target or its calculation methodology, so the results are comparable year-on-year.

Metrics (MDR-M)

Description	Metric	Scope	Methodology	Change of criterion/methodology
Characteristics of employees	SBM-1_03, S1-6_01, S1-6_02, S1-6_04, S1-6_05, S1-6_07, S1-6_08, S1-6_13, S1-6_14, S1-6_15, S1-6_16, S1-6_18, S1-6_19, S1-6_20, S1-9_03, S1-9_04, S1-9_05	The entire Group.	The total number of employees is calculated for the average of the last quarter of the financial year, based on the number of days that a person has worked, over the number of days in the period analysed and adding up the information for all the employees. Once this data is obtained, it is broken down by: gender, professional category, age, types of working hours and contract.	In those metrics that refer to age ranges, the age tranches have been adapted to those recommended by the ESRS. To guarantee the transparency and comparability of the data, the figures for previous years have been recalculated to adapt them to these new segments.
FTE employees	S1-6_09, S1-6_14	The entire Group except employees with contracts without guaranteed hours.	The percentage of each employee's basic working hours is calculated against the full-time working hours (FTE), adding up the information for all employees. The data compiled for the indicator is the average for the last quarter of the financial year.	Not applicable.
Number of employee leaves	S1-6_11	The entire Group.	The total number of employees by category of leaves (voluntary or not voluntary) is reported for the entire financial year.	Not applicable.
Employee turnover	S1-6_12	The entire Group.	Calculated by dividing the number of employee departures (S1-6_11) by the employee annual average (average for the full financial year).	Not applicable.
Percentage of employees covered by collective bargaining agreements	S1-8_01, S1-8_02, S1-8_03	The entire Group.	The number of employees covered by collective bargaining agreements, in force in each market, is obtained, calculating their % over the total employees.	Not applicable.
Percentage of employees covered by workers' representatives (in the EEA)	S1-8_06	The entire Group.	We compile the work centres in which there are workers' representatives and the number of people actively employed in them on the date of analysis. These data are then used to calculate the percentage over the total employees at year end.	Not applicable.

Description	Metric	Scope	Methodology	Change of criterion/methodology
Adequate wages	S1-10_01	The entire Group.	To ensure that wages are adequate in all markets, following verification methodology is used: / We analyse people employed covered by collective bargaining agreements. / For groups not covered by collective bargaining agreements, we check that they are covered by an official minimum wage. / If they are not, a review is made to see if there is a market comparison according to the ARI's Anker methodology. / If they are not covered by any of the aforementioned mechanisms, a verification is made in accordance with Directive (EU) 2022/2041 on adequate minimum wages in the European Union.	Not applicable.
People with disabilities	S1-12_01, S1-12_02	The entire Group.	To calculate the percentage of employees with disabilities, we divide the total average annual number of employees by the number of employees with disabilities at close of the reporting period. The list of total people with disabilities is then broken down by gender.	Not applicable.
Training hours	S1-13_01, S1-13_03, S1-13_04	The entire Group.	The total number of training hours completed per employee is calculated, as is the number of participants, individuals trained and hours per person. The information is detailed by content, geographic area, professional category and gender.	Not applicable.
Metrics linked to ISO 45001	S1-14_01	The entire Group.	Information is compiled from markets and companies certified with ISO45001. The percentage of employees covered is obtained by cross-referencing this data with the employees information by market (S1-6_04).	Not applicable.
Recordable accidents, work-related health events and accident rates (employees)	S1-14_04, S1-14_05, S1-14_06	The entire Group (except the following markets: Monaco, Morocco, Pakistan, Bangladesh, Vietnam, Cambodia, Singapore).	/ Recordable accidents are considered to be any non-commuting workplace accident resulting in absence from work for more than 1 day and involving hospitalisation, fainting, burns to more than 10% of the body or amputation. Accidents deemed to be serious by the local authorities in each market can also be recorded. / Work-related health events are considered to be all non-commuting work-related accidents involving absence from work for more than 1 day, of a musculoskeletal nature and related to the performance of the individual's usual work duties. Occupational diseases are also considered to be health events. / Frequency rate: no. of recordable accidents in relation to the total time worked by employees in the reporting period. The following formula is used to calculate it:(No. accidents with leave * 1,000,000) / No. hours worked. / Severity rate: As a reference, the number of days of sick leave due to recordable accidents and the number of hours worked in the reporting period are used. The following formula is used to calculate it: (Days of leave * 1,000)/ No. hours worked.	The definitions of the concepts of recordable accidents have been modified to align them with the provisions of the ESRS. The figures from previous years have been recalculated to ensure the transparency and comparability of the data.
Recordable accidents and health events (non-employees)	S1-14_04, S1-14_06	All markets (except for: Monaco, Morocco, Pakistan, Bangladesh, Vietnam, Cambodia, Singapore).	Information on recordable accidents and health events involving non-employees provided by Inditex Group facilities during the financial year.	The definition of the concepts of recordable accidents and health events have been modified to align them with the provisions of the ESRS. It was not possible to calculate the historical data using this new definition.
Days lost due to injuries and fatalities resulting from occupational accidents or diseases	S1-14_07	The entire Group.	The number of days lost is calculated by counting all days of absence as a result of recordable accidents and health events.	Not applicable.

Description	Metric	Scope	Methodology	Change of criterion/methodology
Parental leave	S1-15_01, S1-15_02, S1-15_03	The entire Group.	/ Percentage of employees that might benefit from parental leave: Based on the list with the total number of employees, we check local legislation to find out if they are entitled to parental leave. The consultation is segmented by the employee's workplace type, which may be an office, store, and, in the case of Spain, logistics centres and factories are also included. / Percentage of employees that might benefit from parental leave: The total number of employees who are entitled to this type of leave is divided by those who have taken it. This information is broken down by gender.	Not applicable.
Gender pay gap	S1-16_01, S1-16_03, S1-16_04	The entire Group.	This is calculated on the basis of the median salary in each market (considering the total salary: fixed plus variable, consisting of commission and bonus) raising all employees to full-time. By activity group (office, store, logistics and factories) and market, the median salary of men is subtracted from that of women and divided by the median salary of men. The results are weighted by activity group and market taking into account the weight they represent in the total workforce. The result obtained shows the percentage difference between women and men, with a positive sign when it favours women, and a negative sign when it favours men.	The calculation has been modified to include long-term remuneration in keeping with the ESRS provisions. It was not possible to calculate the historical data using this definition.
Ratio of total annual remuneration	S1-16_02	The entire Group.	It is calculated as the ratio between: / The total remuneration to be received by the highest paid individual (excluding Directors), in a theoretical scenario of target compliance with the objectives, including all the components, that is, fixed salary and variable remuneration (annual and long-term). / The total remuneration to be received on a full-time basis by all employees, including all fixed and variable wage-related payments (commissions and bonuses), through which the median value is established for comparison with highest individual wage.	The ratio is calculated on the basis of the median rather than average wage in order to align to the ESRS.
Average remuneration	Act 11/2018	The entire Group.	The average remuneration of individuals belonging to each group analysed is calculated based on the wage to be received on a full-time basis by all employees including fixed and variable wage-related payments (commissions and bonuses), through which the median value is established for comparison with the highest individual wage.	The calculation has been modified to include long-term remuneration and age segments in keeping with the ESRS provisions. The figures from previous years have been recalculated to ensure the transparency and comparability of the data, to adapt them to these new age segments, although it was not possible to calculate the historical data for long-term remuneration.
Promotion ratio	—	The entire Group.	To calculate the promotion ratio, we compare the total number of promotions against new recruits to the Group.	Not applicable.
Hours of absenteeism	Act 11/2018	The entire Group (except for offices and logistics centres outside Spain).	Hours of absenteeism are calculated by differentiating each group analysed. For hourly absences, the effective number of hours of absence is calculated. Daily absences were converted into hours taking into account the employee's group and their contract hours.	Not applicable.
Confirmed cases of discrimination, harassment and other human rights breaches	S1-17_01, S1-17_02, S1-17_03, S1-17_04, S1-17_05, S1-17_08, S1-17_09, S1-17_10, S1-17_11	The entire Group.	Communications received through the Ethics Line from any market in which the Group operates are reviewed individually to check whether they are within the Group's sphere of competence and, in particular, whether they relate to issues linked to potential discrimination, workplace/sexual harassment or any other potential situation that infringes human rights. If this is the case, they are examined and the relevant disciplinary measures are taken.	Not applicable.

S2. Workers in the value chain

Targets (MDR-T)

Target	Related metrics	Scope	Methodology	Change of criterion/ methodology
Reaching three million people with the 'Workers at the Centre' strategy by 2025	—	Inditex's supply chain and its communities.	/ To compute the target, the total number of workers at the factories or locations where the projects are carried out is taken into account. This number includes those directly or indirectly involved in the project. / If a factory is involved in more than one project, it is counted only once. / Absolute and voluntary target. / The establishment of a base year does not apply to this target.	There have been no changes to the target or its calculation methodology, so the results are comparable year-on-year.

Metrics (MDR-M)

Description	Metric	Scope	Methodology	Change of criterion/ methodology
People reached by the 'Workers at the Centre' strategy (in total and for each of the PIAs)	—	The supply chain and its communities.	/ The total number of people reached by the 'Workers at the Centre' strategy is calculated as being the total number of workers in those factories where the projects are implemented. / For each factory, we obtain the number of workers as per the latest audit carried out. If a factory is involved in more than one project, its workers are only counted once.	Not applicable.
Suppliers covered by the 'Workers at the Centre' strategy (in total and for each PIA)	—	The supply chain and its communities.	/ The number of suppliers covered by the 'Workers at the Centre' strategy is calculated as being the total number of facilities where the projects are implemented. / If a facility is involved in more than one project, it is counted only once.	Not applicable.

S3. Affected communities

Targets (MDR-T)

Target	Related metrics	Scope	Methodology	Change of criterion/ methodology
To help 10 million people through our corporate community investment programme between 2022 and 2025	S3-5_02, S3-5_03, S3-5_05	Extended value chain.	/ In computing this target, we have taken into account the total number of people reached by one of the community investment programmes over the course of the entire period. / Everyone participating in a project counts as one person in our accounting. Due to the types of projects, there are no situations where one person is the beneficiary of more than one project. / Absolute and voluntary target. / The establishment of a base year does not apply to this target.	There have been no changes to the target or its calculation methodology, so the results are comparable year-on-year.

Metrics (MDR-M)

Description	Metric	Scope	Methodology	Change of criterion/ methodology
Number of people reached by community investment programmes carried out by Inditex	S3-5_02, S3-5_03	Extended value chain.	To obtain the number of beneficiaries, we consolidate the data from the projects provided by the organisations we work with in implementing them.	Not applicable.
Amount in euros of community investment carried out by the Inditex Group (by type and category of input, area of activity, geography and related SDGs)	S3-4_12	Extended value chain.	To calculate the investment, we consolidate the data from the entire Company and those provided by the organisations we work with. This means considering monetary inputs as well as in-kind and time contributions, which correspond to the hours dedicated by employees to community investment initiatives.	Not applicable.
Leverage from community investment	S3-4_16	Extended value chain.	Additional resources contributed to a community organisation or activity that come from sources other than the Company —employees, customers and suppliers, among others— to a specific business initiative in the community are calculated.	Not applicable.

Description	Metric	Scope	Methodology	Change of criterion/ methodology
Impact on the Community	S3-4_16	People reached.	Impact on the community: people In accordance with B4SI measuring methodology, we measure the impact of the actions on the lives of people involved in the projects. To do this, we measure: – Degree of improvement: we use three mutually exclusive metrics; connection, improvement and transformation – Type of change experienced: behaviour or attitude change, skills or personal effectiveness, quality of life or well-being	Not applicable.
		Beneficiary non-profit organisations.	Impact on the community: community organisations We measure the impact on the beneficiary non-profit organisations of our community investment projects, using B4SI measurement methodology. The impact is measured as: – Improved existing/delivered new services – Improved management processes – Reached more people or spent more time with clients – Taken on more staff or volunteers – Increased their profile	Not applicable.
		Employees involved in community investment projects.	Impact on the Company: on employees We measure the impact on our people by gauging through surveys the change they experience following their involvement in corporate volunteering initiatives, based on the B4SI measuring methodology. We measure: – Job-related skills – Personal impact – Behaviour change	Not applicable.
		Own operations.	Impact on the Company: in our Company We use B4SI methodology to measure the impact based on five metrics: – Human Resources benefits – Improved stakeholder relations/perceptions – Business generated – Other operational improvements – Uplift in brand awareness	Not applicable.

S4. Consumers and end-users

Metrics (MDR-M)

Description	Metric	Scope	Methodology	Change of criterion/ methodology
Total customer complaints received	S4-3_13	Value chain (customers).	/ Complaints: All complaints filed using official complaint forms in Spain are counted. / Total cases managed by customer service channels and type: Contacts received by all customer service channels are consolidated, and classified into four types (pre-sale, post-sale, customer service and complaints) in all the market where Inditex operates.	Not applicable.

G1. Business conduct

Metrics (MDR-M)

Description	Metric	Scope	Methodology	Change of criterion/ methodology
Average payment period	G1-6_01, G1-6_05	Value chain (creditor/ commercial supplier).	The number of payment days is understood to mean the calendar days elapsed from the date of approval of the documents accrediting conformity with the goods delivered or services provided, and the date of payment. Ration of operations paid = ∑ (number of payment days x amount of the paid operation) / total amount of payments made. Reviewed for each kind of creditor/commercial supplier. The calculation does not include intercompany transactions, payments to employees, payments to public authorities or payments for fixed assets.	Not applicable.
Percentage of payments aligned with the standard payment period	G1-6_03, G1-6_05	Value chain (creditor/ commercial supplier).	On the basis of the Group's standard payment period, all invoices are analysed and any outside it are reviewed. The percentage is calculated by dividing the total number of invoices by those outside the period. Percentage calculated for each kind of creditor/commercial supplier. The calculation does not include intercompany transactions, payments to employees, payments to public authorities or payments for fixed assets	Not applicable.
Legal proceedings initiated against the Group for delays in payment to its suppliers, manufacturers and/or third parties.	G1-6_04, G1-6_05	Value chain (creditor/ commercial supplier).	The procedures that we are aware of that affect creditors and suppliers due to late payments by the Group are detailed and analysed. Reviewed for each kind of creditor/commercial supplier. The calculation does not include intercompany transactions, payments to employees, payments to public authorities or payments for fixed assets.	Not applicable.
Percentage of the priority group in our employees that has received compliance training	G1-3_07	All Group employees.	Breakdown of unique people trained in compliance, giving the total number and percentage broken down by job classification and region, in all the markets where the Group operates. The percentage is calculated on the annual average workforce.	Not applicable.
Confirmed reports of corruption and measures taken	G1-4_01, G1-4_02, G1-4_04, G1-4_06, G1-4_07	All Group employees.	Communications received through the Ethics Line (from any market in which the Group operates) are reviewed individually to check whether they are within the Ethics Line's sphere of competence and, in particular, whether they relate to issues linked to potential instances of corruption, fraud and bribery. If this is the case, they are examined and the relevant disciplinary measures are taken.	Not applicable.
Audits carried out (including Social, Environmental, Pre-assessments, Environmental Preliminary Assessments and Traceability)	Act 11/2018	Value chain (product suppliers).	The total number of audits (by area) is calculated as the number of audits completed in the reporting year at factories in the Inditex supply chain.	Not applicable.
Factories of the supply chain	Act 11/2018	Value chain (product suppliers).	The total number of the factories is the number of factories in our supply chain for orders in the summer and winter campaigns of the reporting year, whose cumulative production exceeds 20,000 units, drawn from the primary information in the Company's systems. (Factories in our supply chain whose production is less than 20,000 units account for 2%). This criterion only applies for the purposes of reporting and calculating environmental indicators related to our supply chain, since our policies, audit procedures and continuous improvement programs regarding the human and labour rights of workers apply to all those who form part of our supply chain, regardless of their production volume.	Not applicable.
% compliance with the CCMS at active factories	Act 11/2018	Value chain (product suppliers).	/ The percentage of compliance with the Code of Conduct for Manufacturers and Suppliers for each heading and geographic area is calculated as the coefficient between the number of factories that comply with the requirements of the Code (as verified in social audits) and the total number of factories. / The total number of active factories with purchase orders in the financial year (more than 20,000 units in the last two campaigns in the reporting period) and the last social audit carried out at each facility are considered.	Not applicable.

General concepts

Definitions

Own facilities: Our own facilities include those locations that are owned or operated by the Group; headquarters and commercial offices, stores, distribution centres and factories owned by the Group located in the vicinity of the Group's headquarters in Arteixo (A Coruña).

Risk Management and Control Framework Methodology

Related Metrics: E1-9_10, E1-9_11, E1-9_18, E1-9_19

Type of risks identified	Methodology
/Financial	/ Risks are assessed in terms of residual risk, i.e. the risk remaining after their treatment through the adoption of response measures.
/Political	/ We follow a scenarios methodology, considering two variables to evaluate the possible scenarios: a) impact on cash flows estimated by the Group and b) probability of occurrence.
/Geopolitical	/ For each scenario, we establish different severity levels, based on the intensity of their impact on the cash flows estimated by the Group. The impacts are the result of establishing stress metrics for the routine and/or extraordinary revenue and cost variables.
/Technological	/ A record is kept of the scenarios, as well as the risks that materialise in each of them, through a risk map in which the scenarios are represented according to their total impact in relation to the cash flows expected by the Group and their probability of occurrence in the evaluation time horizon (strong, high, moderate and low risks). This is updated annually.
/Environmental	/ Emerging risks are considered, i.e. new risks that are in the process of transformation or are a novel combination of risks, whose impact, probability of occurrence and cost are not yet well understood. The geographical scope or dimension of the risks is considered and evaluated, especially those particular to certain geographies and those related to the environment, including climate.
/Social	
/Governance	

Metrics used

Impact
The effect that a scenario would have if it were to materialize. The scenario methodology established by the Group considers four severity levels based on the intensity of the impact on the expected cash flows over the horizon discounted at the evaluation date at the Group's average cost of capital (WACC). The average impact resulting from the four established severity levels is considered as the outcome of the scenario for the Group, in order to obtain the cash flow of the four severities adjusted by the probability of occurrence. The business units establish the stress parameters for each of the severities (percentage of stress in the expected revenue and/or routine cost variables, as well as the impact horizon), in order to obtain the deviation from the expected cash flow due to the potential materialization of the different severities.

Likelihood
Risk managers establish probabilities of occurrence over the evaluation horizon for each level of severity. These represent the probability of materialization of the different events exposed in the different severities of each scenario, documenting the different possible scenarios in terms of impact and probability of occurrence.

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[IRO-2_01]

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Pages of the Report where response is given
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	x		x		109-110
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)			x		106
ESRS 2 GOV-4 Statement on due diligence paragraph 30	x				118-119
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i	x	x	x		123
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii	x		x		123
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii	x		x		123
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv			x		123
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14				x	144
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)		x	x		146
ESRS E1-4 GHG emission reduction targets paragraph 34	x	x	x		162-164
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	x				165
ESRS E1-5 Energy consumption and mix paragraph 37	x				165
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	x				165
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	x	x	x		166
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	x	x	x		167
ESRS E1-7 GHG removals and carbon credits paragraph 56				x	Not applicable
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66			x		154-155
ESRS E1-9 Disaggregation of monetary amounts by strong and chronic physical risk paragraph 66 (a) ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c).		x			Not disclosed, subject to phase-in
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c).		x			Not disclosed, subject to phase-in
ESRS E1-9 Degree of exposure of the portfolio to climate- related opportunities paragraph 69			x		Not disclosed, subject to phase-in
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	x				177-178

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Pages of the Report where response is given
ESRS E3-1 Water and marine resources paragraph 9	x				180-181
ESRS E3-1 Dedicated policy paragraph 13	x				Not applicable
ESRS E3-1 Sustainable oceans and seas paragraph 14	x				182
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	x				Not material
ESRS E3-4 Total water consumption in m3 per net revenue on own operations paragraph 29	x				Not material
ESRS 2- IRO 1 - E4 paragraph 16 (a) i	x				186
ESRS 2- IRO 1 - E4 paragraph 16 (b)	x				186
ESRS 2- IRO 1 - E4 paragraph 16 (c)	x				186
ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b)	x				187-188
ESRS E4-2 Sustainable oceans / seas practices or policies paragraph 24 (c)	x				188
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	x				187
ESRS E5-5 Non-recycled waste paragraph 37 (d)	x				203-204
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	x				203-204
ESRS 2- SBM3 - S1 Risk of incidents of forced labour paragraph 14 (f)	x				220
ESRS 2- SBM3 - S1 Risk of incidents of child labour paragraph 14 (g)	x				220
ESRS S1-1 Human rights policy commitments paragraph 20	x				222; 225
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labour Organisation Conventions 1 to 8, paragraph 21			x		222
ESRS S1-1 processes and measures for preventing trafficking in human beings paragraph 22	x				222
ESRS S1-1 workplace accident prevention policy or management system paragraph 23	x				225
ESRS S1-3 grievance/complaints handling mechanisms paragraph 32 (c)	x				229
ESRS S1-14 Number of fatalities and number and rate of work related accidents paragraph 88 (b) and (c)	x		x		248
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	x				248
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	x		x		250
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	x				250
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	x				251
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD paragraph 104 (a)	x		x		251

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Pages of the Report where response is given
ESRS 2- SBM3 – S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	x				253
ESRS S2-1 Human rights policy commitments paragraph 17	x				254-255
ESRS S2-1 Policies related to value chain workers paragraph 18	x				254-255
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	x		x		255-256
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labour Organisation Conventions 1 to 8, paragraph 19			x		255
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	x				267
ESRS S3-1 Human rights policy commitments paragraph 16	x				271-272
ESRS S3-1 non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines paragraph 17	x		x		272
ESRS S3-4 Human rights issues and incidents paragraph 36	x				280
ESRS S4-1 Policies related to consumers and end-users paragraph 16	x				284-285
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	x		x		285
ESRS S4-4 Human rights issues and incidents paragraph 35	x				288-289
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	x				Not applicable
ESRS G1-1 Protection of whistle- blowers paragraph 10 (d)	x				Not applicable
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws paragraph 24 (a)	x		x		307
ESRS G1-4 Standards of anti- corruption and anti- bribery paragraph 24 (b)	x				311

Table of contents required by Act 11/2018

Information requested by Act 11/2018	Materiality	Pages of the Report where response is given and/or direct response	Reporting criteria: ESRS
General information			
A brief description of the business model that includes its business environment, its organisation and structure	Material	121-128	ESRS 2 SBM-1
Markets in which it operates	Material	121; 123	ESRS 2 SBM-1
Organisation's objectives and strategies	Material	90 92-93 121; 127; 128	ESRS 2 SBM-1 ESRS 2 MDR-P ESRS 2 MDR-A ESRS 2 MDR-T
Main factors and trends that may affect its future development	Material	90 92-93 131-134 333-334	ESRS 2 SBM-3 ESRS 2 IRO-1 ESRS 2 IRO-2
Reporting framework used	Material	102-103	ESRS 2 BP-2
Materiality principle	Material	131-134 135-137	ESRS 2 SBM-3 ESRS 2 IRO-1 ESRS 2 IRO-2
Environmental issues			
Management approach: description and results of policies relating to these issues, as well as the main risks related to these issues related to the group's activities	Material	126-128 139-140 147-154 156-157 157-162 168-169 169-172 172-177 179-180 180-182 182-183 185-186 187-188 188-191 193-194 194-195 195-199	ESRS 2 SBM-1 ESRS 2 MDR-P ESRS 2 MDR-A ESRS 2 IRO-1 E1-2 E1-3 E2-1 E2-2 E3-1 E3-2 E4-2 E4-3 E5-1 E5-2
Detailed general information			
Detailed information on the current and foreseeable effects of the company's activities on the environment and, where applicable, health and safety	Material	144-146 170-172 289-290	E1-1 E2-1 S4-4
Environmental assessment or certification procedures	Material	The Environmental Management System is implemented in our corporate headquarters, factories, and own logistics centres, except for two ironing centres that are in the certification process. The Environmental Management System complies with the ISO 14001 standard. Additionally, information on the certification standards of our assets and the environmental audits carried out in our supply chain is reported on pages 159 and 314-315 respectively.	ESRS 2 MDR-A E1-3 G1-2
Resources dedicated to the prevention of environmental risks	Material	The monitoring and proper implementation of the Environmental Management System is overseen by a team of 27 people, who also handle the prevention of environmental risks associated with these facilities. Additionally, information on actions with linked financial resources is reported on pages 157-162 and 188-191.	ESRS 2 MDR-A E1-3 E4-3
Application of the principle of precaution	Material	144; 145 154-155 170 188-191	E1-1 E1-9 E2-1 E4-3
Amount of provisions and guarantees for environmental risks	Material	Considering the nature of our own operations, we do not have any environmental liabilities, expenses, assets, provisions, or contingencies (including tanks or deposits) that could be significant in relation to the equity, financial position, and results of our Company. For this reason, no specific breakdowns are included in this Report. During the 2024 and 2023 financial years, no significant fines or penalties were recorded for violations of applicable environmental regulations. Additionally, we do not have facilities in protected areas.	–

Information requested by Act 11/2018	Materiality	Pages of the Report where response is given and/or direct response	Reporting criteria: ESRS
Pollution			
Measures to prevent, mitigate or repair emissions which severely affect the environment; taking into account any form of atmospheric pollution specific to an activity	Not material (in own operations)	In our own operations, atmospheric emissions other than GHG emissions are not considered material. These may originate from the combustion equipment in our logistics centres, such as heating boilers and steam boilers, and are subject to periodic inspections and verifications conducted by authorized control bodies. This ensures that our atmospheric emissions of gases such as carbon monoxide (CO), nitrogen oxides (NOx), and sulphur dioxide (SO_2) remain within the established limits. Regarding the value chain, relevant information is included on pages 172-177.	ESRS 2 MDR-A E2-2
Including noise and light pollution	Not material	The atmospheric emissions of noise and light pollution are not considered material in own operations. However, to reduce noise levels associated with the distribution and supply of our products during nighttime hours, we have a Unloading Equipment Protocol in place.	–
Circular economy and waste prevention and management			
Prevention, recycling and reuse measures, and other forms of recovery and disposal of waste	Material	197-199 199-201 202-204	ESRS 2 MDR-A E5-2 E5-3 E5-5
Actions to fight against food waste	Not material		–
Sustainable use of resources			
Water consumption and water supply according to local limitations	Not material (in own operations)	Water consumption in our own operations is not considered material. In 2024, water consumption in our facilities—including corporate offices, factories, logistics centers, and stores—was 1,965,253 m^3 (1,938,719 m^3 in 2023). In relative terms, this amounted to 210 litres/m^2 in 2024 (226 litres/m^2 in 2023). In our own operations, water supply for both processes and consumption in all centres comes from public and authorized supply networks. Additionally, all water supply originates from areas with low or no water stress. Regarding the value chain, relevant information is included on pages 183-184.	E3-3
Consumption of raw materials and measures taken to improve the efficiency of their use	Material	195-199 199-200 201-202	ESRS 2 MDR-A E5-2 E5-3 E5-4
Direct and indirect energy consumption	Material	The direct and indirect energy consumption is included on pages 165. Scope 3 also includes emissions associated with the transportation of the products we market. In 2024 emissions related to upstream and downstream transportation—inbound and outbound— corresponded to an energy consumption of 4,095,652 MWh and 4,593,842 MWh, respectively (3,461,774 MWh and 4,418,663 MWh in 2023). Additionally, the estimated electricity consumption of franchised stores was 276,828 MWh and business travel consumption amounted to 141,234 MWh (257,195 MWh and 140,033 MWh in 2023).	E1-5
Measures taken to improve energy efficiency	Material	157-162	ESRS 2 MDR-A E1-3
Use of renewable energies	Material	157-162 165	ESRS 2 MDR-A E1-3 E1-5
Climate change			
Greenhouse gas emissions generated as a result of the company's activities, including the use of the goods and services it produces	Material	166-167	E1-6
Measures taken to adapt to the consequences of climate change	Material	143-146 157-162	ESRS 2 MDR-A E1-1 E1-3
Voluntary reduction targets set for the medium and long term to reduce greenhouse gas emissions and the means implemented for this purpose	Material	143-144 162-164	ESRS 2 MDR-T E1-1 E1-4
Biodiversity protection			
Measures taken to preserve or restore biodiversity	Material	188-191	E4-3

Information requested by Act 11/2018	Materiality	Pages of the Report where response is given and/or direct response	Reporting criteria: ESRS
Impacts caused by the activities or operations in protected areas	Material	185-186 188-191 192	ESRS 2 IRO-1 ESRS 2 SBM-3 E4-3 E4-5
Social issues concerning staff			
Management approach: description and results of policies relating to these issues, as well as the main risks related to these issues related to the group's activities	Material	123 137-140 219-221 221-225 229-237	ESRS 2 MDR-P ESRS 2 MDR-A ESRS 2 SBM-1 ESRS 2 SBM-3 S1-1 S1-4
Employment			
Total number and distribution of employees by country, gender, age and job classification	Material	123 240-243 243-244	ESRS 2 SBM-1 S1-6 S1-9
Total number and distribution of employment contract modalities and annual average of permanent contracts, temporary contracts and part-time contracts by gender, age and job classification	Material	242	S1-6
Number of dismissals by gender, age and job classification	Material	In 2024, there were 5,058 dismissals (5,100 in 2023). Of the total, the gender distribution was as follows: 3,389 women (67%), 1,632 men (32%), 1 non-binary person (0.02%) and 36 people with other/unspecified gender (1%). In 2023, the distribution was 3,508 women (69%), 1,590 men (31%), 2 non-binary people (0.04%) and 0 other/unspecified (0%). By professional classification, 86% were in specialist positions, 7% in managerial positions, and the remaining 7% in executive roles (88%, 6% and 6% respectively, in 2023). By age group, 61% were under 30 years old, 37% were between 30 and 50 years old, and the remaining 2% were over 50 years old (67%, 31%, and 2%, respectively, in 2023). The reported distribution is consistent with our workforce composition for both reporting periods.	S1-6
Average salaries and their evolution broken down by gender, age and job classification or equal value	Material	249-250	S1-16
Wage gap, equal or average remuneration of jobs in the society	Material	250	S1-16
Average remuneration of directors and officers, including variable remuneration, allowances, indemnities, payment to long-term savings pension schemes and any other payment broken down by gender	Material	The total remuneration of the Board of Directors in 2024 was 14,248 thousand of euros (13,462 thousand of euros in 2023). The average annual remuneration accrued by the 21 members of Senior Management at the end of the 2024 reporting period (22 in 2023) broken down by gender, is as follows: – Men: 5,594 (5,101 in 2023) – Women: 4,855 (4,628 in 2023) – Total: 5,357 (4,957 in 2023) More information in sections C.1.13 and C.1.14 of the Annual Corporate Governance Report and the Annual Report on Directors' Remuneration.	ESRS 2 GOV-3 S1-16
Implementation of policies to disconnect from work	Material	245-246	S1-15
Number of employees with disabilities	Material	237-239	S1-12
Organisation of work			
Organisation of working hours	Material	221 226-228 245-246	S1-1 S1-2 S1-8 S1-15
Number of hours of absenteeism	Material	In the 2024 reporting period, the total number of absenteeism hours due to common illness, corresponding to 97.2% of the Group's employees —including all logistics and store employees worldwide, as well as office employees in Spain—, amounted to 13,594,187 hours (12,810,222 hours in 2023). The total number of hours worked during the 2024, reporting period, covering 92.1% of the Group's employees —including logistics and store employees worldwide—, amounted to 182,461,397 hours (92.4% of employees and 182,712,729 hours in 2023).	–
Measures designed to facilitate the enjoyment of amicable settlement and to promote the corresponding exercise of these by both parents	Material	235-236 245-246	ESRS 2 MDR-A S1-4 S1-15

Information requested by Act 11/2018	Materiality	Pages of the Report where response is given and/or direct response	Reporting criteria: ESRS
Health and safety			
Occupational health and safety conditions	Material	224-225 235-236 248-249	ESRS 2 MDR-P S1-1 S1-14
Work-related accidents, in particular their frequency and severity, as well as occupational diseases; broken down by gender	Material	248-249	S1-14
Labour Relations			
Organisation of social dialogue including procedures for informing, consulting and negotiating with staff	Material	226-229	S1-2 S1-3
Mechanisms and procedures the company has to promote the involvement of workers in the management of the company, in terms of information, consultation and participation	Material	221 226-229	S1-1 S1-2 S1-3
Percentage of employees covered by a collective bargaining agreement by country	Material	245	S1-8
Assessment of collective bargaining agreements, particularly in the field of health and safety at work	Material	226-228 245 248	S1-2 S1-8 S1-14
Training			
Policies implemented in the field of training	Material	221 224 233-235 246-248	S1-1 S1-4 S1-13
Total number of training hours by occupational category	Material	246-248	S1-13
Universal accessibility			
Universal accessibility for people with disabilities	Material	223 232 237-239 291	ESRS 2 MDR-A S1-1 S1-4 S1-12 S4-4
Equality			
Measures taken to promote equal treatment and equal opportunities between women and men	Material	222-224 230-232	ESRS 2 MDR-P ESRS 2 MDR-A S1-1 S1-4
Equality plans, measures taken to promote employment, protocols against sexual and gender-based harassment	Material	138 221-225 226-228 230-232 245-246	ESRS 2 MDR-P ESRS 2 MDR-A S1-1 S1-2 S1-4 S1-15
Policy against all types of discrimination and, where applicable, diversity management	Material	138 221-225	ESRS 2 MDR-P S1-1
Respect for human rights			
Management approach: description and results of policies relating to these issues, as well as the main risks related to these issues related to the group's activities	Material	137-140 128 221-225 229-237 254-256 258-267 270-272 274-281 283-285 288-291 295 304-306	ESRS 2 MDR-P ESRS 2 MDR-A ESRS 2 SBM-1 ESRS 2 IRO-1 S1-1 S1-4 S2-1 S2-4 S3-1 S3-4 S4-1 S4-4 G1-1
Application of due diligence procedures			
Application of due diligence procedures in the field of human rights and prevention of the risks of human rights violations and, where applicable, measures to mitigate, manage and repair potential abuses committed	Material	128 118-119 299-300 304-306	ESRS 2 SBM-1 ESRS 2 GOV-4 G1-1
Allegations of cases of human rights violations	Material	251 267 272 280 288 310-311	S1-17 S2-4 S3-1 S3-4 S4-4 G1-4

Information requested by Act 11/2018	Materiality	Pages of the Report where response is given and/or direct response	Reporting criteria: ESRS
Measures implemented to promote and comply with the provisions of the ILO fundamental conventions relating to respect for freedom of association and the right to collective bargaining; eliminating discrimination in employment and occupation; the elimination of forced or compulsory labour; the effective abolition of child labour	Material	Inditex's Code of Conduct upholds the right to freedom of association and collective bargaining. This Code applies to all of the Group's operations. Likewise, the Code of Conduct for Manufacturers and Suppliers also establishes this right, applying to all of the Group's suppliers. The Compliance Program for the Code of Conduct for Manufacturers and Suppliers of Inditex assesses compliance with workers' freedom of association. The Compliance Program for the Code of Conduct for Manufacturers and Suppliers of Inditex prohibits child labour and applies to all of the Group's operations and suppliers. The Compliance Program for the Code of Conduct for Manufacturers and Suppliers of Inditex prohibits forced labour and applies to all of the Group's operations and suppliers. Additionally, relevant information is included on pages 137-140 221-225 226-229 245 253 254-256 258-261 270-272 283-285	ESRS 2 MDR-P S1-1 S1-2 S1-8 S2-1 S2-4 S3-1 S4-1
Fight against corruption and bribery			
Management approach: description and results of policies relating to these issues, as well as the main risks related to these issues related to the group's activities	Material	295 296-298 298-306 306-310 310-311	ESRS 2 MDR-P ESRS 2 MDR-A ESRS 2 IRO-1 G1-1 G1-3 G1-4
Measures adopted to prevent corruption and bribery	Material	296-298 298-306 306-310 310-311	ESRS 2 MDR-P ESRS 2 MDR-A G1-1 G1-3 G1-4
Measures to fight money laundering	Material	296-298 298-306 306-310 310-311	ESRS 2 MDR-P ESRS 2 MDR-A G1-1 G1-3 G1-4
Contributions to foundations and non-profit entities	Material	129-131 274-281	–
Information on the company			
Management approach: description and results of policies relating to these issues, as well as the main risks related to these issues related to the group's activities	Material	252-253 254-256 258-267 269-270 270-272 274-281 282-283 283-285 288-291 295 312-316	ESRS 2 SBM-3 ESRS 2 MDR-P ESRS 2 MDR-A S2-1 S2-4 S3-1 S3-4 S4-1 S4-4 G1-2
Company commitments to sustainable development			
The impact of the company's activity on employment and local development	Material	258-267 274-281	ESRS 2 MDR-A S2-4 S3-4
The impact of the company's activity on local populations and on the territory	Material	258-267 274-281	ESRS 2 MDR-A S2-4 S3-4
Relations maintained with local community actors and the modalities of dialogue with them	Material	129-131 258-267 272-273 273-274 274-281	ESRS 2 SBM-2 ESRS 2 MDR-A S2-4 S3-2 S3-3 S3-4

Information requested by Act 11/2018	Materiality	Pages of the Report where response is given and/or direct response	Reporting criteria: ESRS
Partnership or sponsorship actions	Material	131 162 175-177 183 188-191 199 237 258-267 274-281 291	–
Subcontracting and suppliers			
Inclusion of social, gender equality and environmental matters in the procurement policy	Material	137-140 118-119 126-127 254-256 258-261 262-263 312-316	ESRS 2 MDR-A ESRS 2 MDR-P ESRS 2 GOV-4 ESRS 2 SBM-1 S2-1 S2-4 G1-2
Consideration of its social and environmental responsibility in relations with suppliers and subcontractors	Material	137-140 199-200 254-256 256-257 258-261 265-266 312-316	ESRS 2 MDR-P E5-3 S2-1 S2-2 S2-4 G1-2
Monitoring and audit systems and their results	Material	312-316	–
Consumers			
Measures for consumer health and safety	Material	170-172 173-175 284-285 289-290	ESRS 2 MDR-A E2-1 E2-2 S4-1 S4-4
Claims systems, complaints received and their resolution	Material	286-288	S4-3
Tax information			
The benefits obtained country by country	Material	335-340	–
Tax on profits paid	Material	335-340	–
Public subsidies received	Material	337	–

Regulation (EU) 2020/852 - Taxonomy	Materiality	Pages of the Report where response is given and/or direct response	Reporting criteria
Qualitative information			
Accounting policy	Material	205	Regulation (EU) 2020/852 Regulation (EU) 2021/2178
Assessment of compliance with Regulation (EU) 2020/852	Material	205	Regulation (EU) 2020/852 Regulation (EU) 2021/2178
Contextual information	Material	205	Regulation (EU) 2020/852 Regulation (EU) 2021/2178
Quantitative information			
Taxonomy-eligible and aligned turnover	Material	212	Regulation (EU) 2020/852 Regulation (EU) 2021/2178 Regulation (EU) 2021/2139 Regulation (EU) 2023/2486
Taxonomy-eligible and aligned CapEx	Material	213-214	Regulation (EU) 2020/852 Regulation (EU) 2021/2178 Regulation (EU) 2021/2139 Regulation (EU) 2023/2486
Taxonomy-eligible and aligned OpEx	Material	215	Regulation (EU) 2020/852 Regulation (EU) 2021/2178 Regulation (EU) 2021/2139 Regulation (EU) 2023/2486

9. Independent verification report

Shape the future
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INDEPENDENT LIMITED ASSURANCE REPORT ON THE CONSOLIDATED STATEMENT OF NON-FINANCIAL INFORMATION AND SUSTAINABILITY INFORMATION

(Translation of a report originally issued in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

To the shareholders of Industria de Diseño Textil, S.A.:

Conclusion of limited assurance

In accordance with article 49 of the Commercial Code, we have performed a limited assurance engagement on the Consolidated Statement of Non-Financial Information (hereinafter, "NFIS") for the year ended January 31, 2025 (hereinafter, year 2024) of Industria de Diseño Textil, S.A. (the "Entity") and subsidiaries (the "Group"), which is part of the Group's Consolidated Directors Report.

The content of the NFIS includes additional information that required by prevailing mercantile regulations in respect of non-financial information, specifically the Sustainability Information prepared by the Group for the year ended January 31, 2025 (hereinafter, the "Sustainability Information") in accordance with Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022, as regards corporate sustainability reporting (the "CSRD"). The Sustainability Information was also subject to limited assurance.

Based on the procedures applied and the evidence obtained, nothing has come to our attention that causes us to believe that:

a) The Group's NFIS for the year ended January 31, 2025, has not been prepared, in all material respects, in accordance with the contents required by prevailing mercantile regulations and the criteria selected in European Sustainability Reporting Standards ("ESRS"), as well as other criteria described as explained for each subject matter in the "Table of contents required by Act 11/2018" of the NFIS.

b) The Sustainability Information, taken as a whole, has not been prepared, in all material respects, in accordance with the sustainability reporting framework applied by the Group and identified in section "BP-1 - General basis for preparation of the Report", including:

- That the description provided of the process for identifying the Sustainability Information to be disclosed included in section "Materiality assessment" is consistent with the process implemented and that it enables the identification of the material information to be disclosed in accordance with the requirements of ESRS.
- Compliance with ESRS.
- Compliance with the disclosure requirements included in section "Disclosure pursuant to article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)" on chapter 5 "Environmental information" in the Sustainability Information with the provisions of Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020, on the establishment of a framework to facilitate sustainable investment.

Domicilio Social: Calle de Raimundo Fernández Villaverde, 65. 28003 Madrid - Inscrita en el Registro Mercantil de Madrid, tomo 9.364 general, 8.130 de la sección 3ª del Libro de Sociedades, folio 68, hoja nº 87.690-1, inscripción 1ª. C.I.F. B-78970506.

A member firm of Ernst & Young Global Limited.

Basis of conclusion

We have performed our limited assurance engagement in accordance with generally accepted professional standards applicable in Spain and specifically with the guidelines contained in the Guidelines 47 (revised) and 56 issued by the Spanish Institute of Chartered Accountants on non-financial information assurance engagements and considering the contents of the note issued by the Spanish Accounting and Auditing Institute (ICAC) on December 18, 2024 (the "generally accepted professional standards").

The procedures performed in a limited assurance engagement are less in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Our responsibilities under those regulations are further described in the *Practitioner's responsibilities* section of our report.

We have complied with the independence and other ethics requirements of the International Code of Ethics for Professional Accountants (including international standards on independence) issued by the International Ethics Standards Board for Accountants (IESBA Code), which is based on the fundamental principles of integrity, objectivity, professional competence and due care, confidentiality, and professional behavior.

Our firm applies International Standard on Quality Management (ISQM) 1, which requires us to design, implement, and operate a system of quality management including policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our conclusion.

Responsibilities of the Directors

The preparation of the NFIS included in the Group's Consolidated Directors Report is the responsibility of the Directors of Industria de Diseño Textil, S.A. The NFIS has been prepared in accordance with the content required by prevailing mercantile regulations and the criteria selected in ESRS, as well as other criteria described as explained for each subject matter in the "Table of contents required by Act 11/2018" of the NFIS.

This responsibility also includes the design, implementation, and maintenance of such internal control as considered necessary to ensure that the NFIS is free of material misstatement, whether due to fraud or error.

The Directors of Industria de Diseño Textil, S.A. are also responsible for defining, implementing, adapting, and maintaining the management systems from which the necessary information for preparing the NFIS is obtained.

With regard to the Sustainability Information, the entity's Directors are responsible for developing and implementing a process for identifying the information to be included in the Sustainability Information in accordance with the CSRD, the ESRS and Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council, of 18 June 2020, and for disclosing information about this process in the Sustainability Information itself in section "Materiality assessment". This responsibility includes:

- Understanding the context in which the Group carries out its activities and business relationships, as well as its stakeholders, in relation to the Group's impact on people and the environment.
- Identifying the actual and potential impacts (both negative and positive), as well as risks and opportunities that could affect, or could reasonably be expected to affect, the Group's financial position, financial performance, cash flows, access to financing, or cost of capital in the short, medium or long term.
- Assessing the materiality of the identified impacts, risks and opportunities.
- Making assumptions and estimates that are reasonable under the circumstances.

The Directors are also responsible for the preparation of the Sustainability Information, which includes the information identified by the process, in accordance with the sustainability reporting framework applied, including compliance with the CSRD, the ESRS, and compliance of the disclosure requirements included in section "Disclosure pursuant to article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)" on chapter 5 "Environmental information" in the Sustainability Information with Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council, of 18 June 2020, on the establishment of a framework to facilitate sustainable investment.

This responsibility includes:

- Designing, implementing and maintaining such internal control as the Directors consider relevant to enable the preparation the Sustainability Information that is free from material misstatement, whether due to fraud or error.
- Selecting and applying appropriate methods for the presentation of Sustainability Information and the basis of assumptions and estimates that are reasonable, considering the circumstances, about specific disclosures.

Inherent limitations in the preparation of the information

In accordance with ESRS, the entity's Directors are required to prepare prospective information on the basis of assumptions and hypotheses, which must be included in the Sustainability Information, about potential future events and possible future actions, if any, that the Group could take. Actual results may differ significantly from estimated results, as the reference is to the future and future events frequently do not occur as expected.

In determining the disclosures in the Sustainability Information, the entity's Directors interpret legal and other terms that are not clearly defined and that may be interpreted differently by others, including the legal conformity of such interpretations, and, accordingly, are subject to uncertainty.

Practitioner's responsibilities

Our objectives are to plan and perform the assurance engagement to obtain limited assurance about whether the NFIS and Sustainability Information are free from material misstatement, whether due to fraud or error, and to issue a limited assurance report that includes our conclusions. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of this information.

As part of a limited assurance engagement, we exercise professional judgment and maintain professional skepticism throughout the engagement. We also:

- Design and perform procedures to assess whether the process for identifying the disclosures to be included in the NFIS and Sustainability Information is consistent with the description of the process followed by the Group and enables, where appropriate, the identification of the material information to be disclosed as required in the ESRS.

- Perform risk procedures, including obtaining an understanding of internal control relevant to the engagement, to identify disclosures where material misstatements are more likely to arise, whether due to fraud or error, but not for the purpose of providing a conclusion on the effectiveness of the Group's internal control.

- Design and perform procedures responsive to disclosures in the NFIS and Sustainability Information where material misstatements are likely to arise. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

Summary from the work performed

A limited assurance engagement involves performing procedures to obtain evidence as a basis for our conclusions. The nature, timing and extent of procedures selected depend on professional judgment, including the identification of disclosures where material misstatements are likely to arise, whether due to fraud or error, in the NFIS and in the Sustainability Information.

Our work consisted of making inquiries of management and of the Group's various business units and components that participated in the preparation of the NFIS and Sustainability Information, reviewing the processes used for compiling and validating the information presented in the NFIS and Sustainability Information, and applying certain analytical procedures and performing tests of details on a sample basis as described below:

For verification of the NFIS:

- Holding meetings with Group personnel to obtain an understanding of the business model, the policies and management approaches applied, and the main risks related to these matters and to gather the information needed to perform the independent assurance work.

- Analyzing the scope, relevance and completeness of the content of the NFIS for the year 2024 based on the materiality assessment performed by the Group and described in section "Materiality assessment" of the NFIS, considering the content required in prevailing mercantile regulations.

- Analyzing the processes used to compile and validate the data presented in the NFIS for the year 2024.
- Reviewing the disclosures relating to the risks, policies and management approaches applied with respect to the material matters presented in the NFIS for the year 2024.
- Checking, through sample testing, the information underlying the content of the NFIS for the year 2024 and whether it has been adequately compiled based on data provided by information sources.

For verification of the Sustainability Information:

- Making inquiries of Group personnel:
  - To understand the business model, the policies and management approaches applied, and the main risks related to these matters and to gather the information needed to perform the independent assurance work.
  - To know the source of the information used by management (e.g., interaction with stakeholders, business plans and documents on strategy) and review the Group's internal documentation on its process.
- Obtaining, through inquiries of Group personnel, insight into the entity's processes for gathering, validation, and presenting information relevant for the preparation of its Sustainability Information.
- Evaluating whether the evidence obtained in our procedures on the process implemented by the Group for determining the disclosures to be included in the Sustainability Information is consistent with the description of the process included in that information, as well as evaluating whether that process implemented by the Group enables identification of the material information to be disclosed in accordance with the requirements of the ESRS.
- Evaluating whether all the information identified in the process implemented by the Group for determining the disclosures to be included in the Sustainability Information is effectively included.
- Evaluating whether the structure and presentation of the Sustainability Information is consistent with ESRS, and the rest of the sustainability reporting framework applied by the Group.
- Performing inquiries of relevant personnel and analytical procedures on the disclosures in the Sustainability Information, considering those where material misstatements are likely to arise, whether due to fraud or error.
- Performing, as appropriate, substantive procedures through sampling of selected disclosures in the Sustainability Information, considering those where material misstatements are likely to arise, whether due to fraud or error.
- Obtaining, where appropriate, reports issued by accredited independent third parties accompanying the Consolidated Directors Report in response to the requirements of European regulations and, in relation to such information and in accordance with generally accepted professional standards, verification, exclusively, of the accreditation of the practitioner and that the scope of the report issued corresponds to that required by European regulations.

- Obtaining, as appropriate, the documents containing the information incorporated by reference, the reports issued by auditors or practitioners on such documents and, in accordance with generally accepted professional standards, verification, exclusively, that in the document to which the information incorporated by reference refers, the requirements described in ESRS for the incorporation by reference of information in the Sustainability Information are met.

- Obtaining a representation letter from the Directors and management regarding the NFIS and Sustainability Information.

Other information

The Management is responsible for the other information. The other information comprises the consolidated financial statements and the rest of the information included in the Consolidated Directors Report but does not include either the auditors' report on the consolidated financial statements or the assurance reports issued by accredited independent third parties required by European Union law on specific disclosures contained in the Sustainability Information and attached to the Consolidated Directors Report.

Our assurance report does not cover the other information, and we do not express any form of assurance conclusion on it.

Our responsibility in connection with our engagement to verify the Sustainability Information is to read the other information identified and consider whether it is materially inconsistent with the Sustainability Information or the knowledge we have obtained during the assurance engagement that could indicate material misstatements in the Sustainability Information.

ERNST & YOUNG, S.L.

(Signature on the original in Spanish)

Hildur Eir Jónsdóttir

March 12, 2025