

INDITEX

Inditex Group Modern Slavery and
Human Trafficking in Supply Chain
Statement FY2024

* Since June 2025 the Social Advisory Board is called the Sustainability and Inclusion Board.

The Group has an Audit and Compliance Committee which is responsible for overseeing and assessing financial and non-financial risks, such as those arising from the Group's actions in relation to its social, environmental and other sustainability practices, including those related to human rights.

Inditex also relies on a Social Advisory Board, a collegiate body composed of external independent members, which advises it on sustainability issues. The Social Advisory Board plays a key role in the relationship with stakeholders, as it is responsible for formalizing the dialogue with the key representatives of the societies where Inditex conducts its business.

Furthermore, the Ethics Committee, is the internal body reporting to the Board, through the Audit and Compliance Committee, which ensures compliance with the rules of conduct and specifically with the Code of Conduct -which applies globally to the Group's entire workforce- and the Code of Conduct for Manufacturers and Suppliers (hereinafter, the "Codes").

The Ethics Committee is also responsible for managing the Ethics Line, a strictly confidential channel available to any employee, director and shareholder, as well as anyone working under the supervision and management of manufacturers, suppliers, contractors and subcontractors of the Group. Through it, they may communicate queries and/or doubts about the interpretation or application of the internal rules of conduct, and infringement 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 Inditex has a direct labour, commercial or professional relationship.

The Policy on Human Rights, the Due Diligence procedures and the grievance mechanisms represent the first, second and third pillars of the Group's Human Rights strategy respectively.

Inditex Group's Sustainability teams are tasked with managing and coordinating all the Group's activities aimed at ensuring compliance with the Code of Conduct for Manufacturers and Suppliers throughout the entire supply chain.

3. Policies and commitments

Internal Responsibility and Certification

Inditex applies a zero-tolerance policy on modern slavery, human trafficking and any form of forced labour.

3.1. Policies and Internal Regulations

3.1.1. Human Rights Policy of Inditex Group

Inditex Group's Human Rights Policy was approved by the Board of Directors on 12 December 2016, following a favourable report of the Audit and Compliance Committee (formerly, the Audit and Control Committee) and the Social Advisory Board, which represents the Group's stakeholders. It was recently updated in February 2024.

In the framework of the United Nations Guiding Principles on Business and Human Rights, the Human Rights Policy defines Inditex's stance regarding its commitment to respect internationally recognized human rights and sets out the values and principles which guide its activities.

Notwithstanding its commitment to all Human Rights, Inditex has identified those rights more directly related to its value chain, based upon the review of its business model and the expectations of its stakeholders.

Rejection of forced labour is one of the focal points singled out in the Inditex Human Rights Policy. In this regard, such Policy reads: "The Inditex Group rejects any form of forced or compulsory labour, as defined in ILO Convention 29. This extends both to its own employees and its entire supply chain, as well as to any natural and/or legal person related to the Group. Inditex joined UN Global Compact in 2001, and adhered to its principle 4, according to which, businesses should uphold the elimination of all forms of forced and compulsory work or work done under coercion."

Furthermore, child labour is also rejected: The Inditex Group respects children's rights and rejects child labour, pursuant to the provisions of ILO Convention 138 and in accordance with the minimum working age under the relevant regulations of each country. No one under the age of 16 will be hired by the Group, unless not doing so would constitute a violation of the applicable local regulations. Likewise, pursuant to its Code of Conduct for Manufacturers and Suppliers, the Group forbids its suppliers and/or manufacturers to hire anyone under the age of 16. Moreover, Inditex advocates children's right to education, in line with the Children's Rights and Business Principles of the United Nations Children's Fund (UNICEF)."

Compliance with Inditex's Human Rights Policy is mandatory for the whole Group and it is enforced on third parties associated with Inditex. It has been disclosed to the different departments of the Group and it is available to all the employees on the Group's intranet as well as on the corporate website (www.inditex.com). The enforcement of the Policy involves implementing and executing due diligence processes which allow Inditex to assess and, where appropriate, regularly identify current and/or potential impacts in the field of Human Rights. Appropriate measures are also taken to prevent, monitor, mitigate or remedy any potential negative consequences and foster positive impacts throughout the entire supply chain.

The Human Rights Policy can be found [here](#).

3.1.2. Sustainability Policy of Inditex Group

The Sustainability Policy addresses Inditex Group's commitment to Sustainability and defines the principles assumed by the Group to integrate sustainable practices aligned with the Planetary Boundaries and respect for human rights and other living beings' rights, across its business model, its activities and relations with Stakeholders. The Sustainability Policy was approved by the Board of Directors on 9 December 2015 and its last amended was on 4 February 2025.

The Policy addresses:

- The Group's commitment to Sustainability
- The general principles and action lines for integrating sustainable practices throughout the business model and stakeholder engagement
- The commitment to driving a transformation that contributes to the development of a fair and resilient society and a clean, healthy and sustainable environment.

The Sustainability Policy can be found [here](#).

3.1.3. Code of Conduct of Inditex Group

The Inditex Group's Code of Conduct (also known simply as the "Code") is the document that establishes the Group's ethical commitments and principles of action that should guide relations between people in the Group and the relations between them and the various stakeholders anywhere in the world, such as customers, suppliers, shareholders and the communities in which we operate. The Code is mandatory for all employees, including Senior Management, and the members of the management bodies of the companies that make up the Group. The Code strengthens awareness and enforcement of Inditex's ethical culture, deeply rooted in respecting Human and Labour Rights and in the effective inclusion of all employees, respecting their diversity.

In 2023, we reviewed and updated the former 'Code of Conduct and Responsible Practices' approved in 2012. One of the aims of this review process was to ensure that the Code of Conduct reflects the corporate ethical culture and the commitments undertaken by Inditex in different spheres; responds to the new regulatory realities and challenges faced by the Company; and reflects the diversity, global nature and multiculturalism of Inditex Group. The text was reviewed with all markets in which the Inditex Group has subsidiaries, with external advisors from multiple jurisdictions and with the Inditex's Social Advisory Board, as the main liaison with the Group's various stakeholders. In addition, as part of this process, the European Works Council was informed. The review process culminated on 6 February 2024, with the approval of the Code by the Board of Directors.

The Code of Conduct can be found [here](#).

3.1.4. Code of Conduct for Manufacturers and Suppliers of Inditex Group

The Code of Conduct for Manufacturers and Suppliers was approved by the Board of Directors in 2001 and amended in 2012. It is enforced across the entire supply chain, including all tiers and processes and establishes the framework that governs their relationships with Inditex.

Before commencing work for Inditex, all suppliers, in order to be part of the Inditex's supply chain, must first accept and undertake to meet (and to enforce compliance by the facilities they work with) the Inditex Minimum Requirements (IMRs). The IMRs include compliance with the Inditex Code of Conduct for Manufacturers and Suppliers and the Human Rights Policy -among other policies and standards- which explicitly prohibits slavery and human trafficking, and it is based on applicable national laws and international standards in the field, with which our suppliers and manufacturers must comply.

The first section of the Code of Conduct for Manufacturers and Suppliers provides that: "Inditex shall not allow any form of forced or involuntary labour in their manufacturers and suppliers. They may not require their employees to make any kind of "deposits", nor are they entitled to retain employees' identity documents. Manufacturers shall acknowledge the right of their employees to leave their employer after reasonable notice."

The Code of Conduct for Manufacturers and Suppliers specifies that "aspects related to such limitations will be governed by Conventions 29 and 105 of International Labour Organization (ILO)".

The Code also states that Manufacturers and Suppliers shall not employ minors. Inditex defines minors as those persons who have not yet reached their 16th birthday. In cases where local legislation stipulates a higher minimum age, the higher limit shall apply. Persons with the ages between of 16 and 18 years will be considered young

workers. Young workers shall not work during night hours or in hazardous conditions.

Specifically, aspects related to prohibition of child labour will be developed according to Conventions 138 and 182 of the International Labour Organization (ILO).

The Code of Conduct for Manufacturers and Suppliers can be found [here](#).

3.1.5. Sustainability Stakeholder Relations Policy

Inditex's Sustainability Stakeholder Relations Policy establishes the grounds for managing stakeholder engagement in connection with sustainability.

Approved by the Board of Directors on 4 February 2025, its purpose is to establish a general framework of action that enables Inditex Group to consider the expectations, opinions, inputs and innovations of Stakeholders in the Group's decision-making process, allowing for the integration of practices aligned with the respect for human rights.

The Sustainability Stakeholder Relations Policy can be found [here](#).

3.1.6. Criminal Risks Prevention 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.

As part of the Global Compliance Model, Inditex relies on a Criminal Risks Prevention Model to prevent the commission of offences under Spain's Criminal Code. It is made up of:

- / 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.
- / 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: this is a catalogue of criminal risks to which the Group is inherently exposed, and an inventory of controls defined for mitigating such risks. It is continuously reviewed and updated in accordance with applicable law and Group operations.

The Criminal Risk Prevention Policy and the Risk and Control 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 Risks 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.

The Criminal Risk Prevention Policy can be found [here](#).

Find out more about our policies [here](#).

3.2. Commitments and Initiatives

Among others, Inditex has been part of the following commitments and Initiatives.

3.2.1. The Ten Principles of United Nations Global Compact

Since 2001, Inditex has been a signatory of the United Nations Global Compact and it commits to respect and promote its ten universally recognized principles, which include, among others, (4) the elimination of all forms of forced and compulsory labour and (5) the effective abolition of child labour.

3.2.2. Commitment to the Sustainable Development Goals (SDGs)

Inditex is fully committed to sustainability and respect for human rights throughout its value chain. In this regard, Inditex has committed to the 17 Sustainable Development Goals (SDGs). Inditex's sustainable strategy is aligned with the commitment to working towards the objectives set by the SDGs for 2030, which include decent work and the abolition of child labour, modern forms of slavery and human trafficking.

3.2.3. Ethical Trading Initiative (ETI)

Inditex has been a member of this dialogue platform to improve working conditions of workers since October 2005. ETI is an alliance of companies, international trade unions, and non-governmental organizations. ETI's Base Code covers any manner of forced labour. Individual and collective initiatives to eradicate modern slavery are encouraged by the organization.

3.2.4. Global Framework Agreement with IndustriALL

Since signing the Global Framework Agreement in 2007 and renewing it, first in 2014 and then 2019, we have been able to cement a set of principles based on transparency and worker empowerment, further strengthening the role played by IndustriALL Global Union affiliates in the various supplier markets. The Agreement includes a protocol, signed in 2022, that fosters social dialogue by establishing mechanisms –such as procedures for access to work centres– that strengthen the role of local trade unions and advance towards a better understanding of supply chain workers' needs.

3.2.5. UNI Global Union

100% of the Inditex Group employees are covered by the Global Agreement signed with UNI in 2009 for the implementation of fundamental labour rights and decent work, with UNI Global Union (UNI). UNI is a network of trade unions in the trade and retail sector, which encompasses more than 900 trade unions worldwide and represents more than 20 million workers.

3.2.6. Public-Private Partnership with the International Labour Organization (ILO)

Entered into in 2017 and renewed in 2023, the Partnership is aimed at the joint promotion between Inditex and ILO of respect for the fundamental principles and labour rights in the supply chain of the cotton sector, engaging in skill-building and raising awareness among cotton communities.

3.2.7. ILO's Better Work Programme

The Better Work Programme is a platform to improve compliance with labour regulations and competitiveness of global supply chains.

Inditex has been a member since October 2007. On 9 October 2013, Inditex and Better Work entered into a specific collaboration agreement whereby Inditex became a direct buyer partner of the programme.

3.2.8. Participation in Shift's Business Learning Programme

Shift is a non-profit organization specializing in human rights. Inditex is part of its Business Learning Programme, a leading programme in the field that involves companies of all sectors willing to work towards implementing the UN Guiding Principles on Business and Human Rights.

3.2.9. United Nations High Commissioner for Refugees (UNHCR)

Inditex and UNHCR have been working together since 2020 with the common goal of meeting the clothing needs of refugees and internally displaced people. Through this strategic partnership, Inditex, in collaboration with its suppliers, supports UNHCR in its task of sheltering refugees who have been forced to abandon their homes and helping to restore their dignity.

3.2.10. Tent Partnership for Refugees

Founded by Tent Foundation, a non-profit organisation, this is a global network of more than 200 companies that seeks to mobilise the private sector to create partnerships to improve the lives of refugees.

3.2.11. Country partnership for zero child poverty (Alianza país por la pobreza infantil cero)

This initiative, fostered by the Spanish Government's High Commissioner against Child Poverty, is aimed at encouraging the engagement in and the creation of partnerships between all social actors to work towards a common mission: a Spain in which all children and teenagers have the same opportunities for the future, regardless of the conditions into which they are born. Inditex joined the Partnership in January 2021.

Find out more about our commitments and initiatives [here](#).

4. Inditex supply chain

Manufacturing and procurement of the Group are based on socially and environmentally responsible management of the supply chain. Thus, decent working conditions are promoted for all workers of our suppliers and manufacturers.

Our supply chain is present globally, organised through 10 clusters of suppliers: spaces for cooperation and dialogue that aim to promote sustainable production environments in each strategic geographic area and in a framework of respect for Human and Labour rights, although a significant part of the cutting, sewing, dyeing, washing, printing or finishing factories that manufacture its garments in are located in Spain or neighbouring countries like Portugal, Morocco and Turkey. Every supplier and factory that makes up the Group's supply chain is bound to abide by the values and ethical behaviour principles that are central to the Group.

In this regard, the Company's commitment to the responsible management of its supply chain requires identifying working areas where Inditex can contribute to improving the conditions of the industry in each market where Inditex operates, creating sustainable production environments. Inditex meets this challenge by setting and

implementing policies aligned with Human Rights and the fundamental labour standards. Inditex also establishes monitoring and direct cooperation tools with its suppliers and takes part in multilateral dialogue with organizations and institutions in the field.

In 2024 we had 6,615 factories¹, which included all tiers of our supply chain, in 50 markets and employed more than three million people.

We see traceability as our ability to identify and trace the history, application, location and distribution of products, parts and materials, in keeping with Recommendation No. 46 of the United Nations Economic Commission for Europe².

Accordingly, we have traceability management and assessment programmes. We are also working on deepening the traceability of raw materials, as achieving full traceability of our entire supply chain is one of the challenges facing our industry.

Our traceability ecosystem allows us to compile and evaluate information concerning the traceability of our products. Specifically, it helps us to ascertain in which production facilities our articles were created and to certify the use of more responsible materials.

Based on our Traceability Requirements, suppliers must:

/ Know their supply chain and work exclusively with manufacturers and intermediaries previously assessed and authorised by Inditex and which comply with all our sustainability standards.

/ Know and understand us of all the facilities and intermediaries involved in each of the production processes, from the fibre or yarn to the final garment for each order.

/ Provide proof of the use of lower-impact raw materials³ by means of documentation proving their origin, as well as certifications of the facilities if applicable.

To facilitate the implementation of these requirements and to help our suppliers improve their traceability processes, we use our In.Trust management system to ease the process whereby our suppliers provide information on their supply chain.

We use various control mechanisms operating in parallel to verify compliance with our traceability requirements:

- Designation control check: we check that our suppliers have provided information about their supply chain before a deadline.
- Review of certificates: we check raw material certificates before approving 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 production in progress and the ones completed.

In 2024, 10,387 traceability audits were conducted.

Find out more in the Inditex Group's 2024 Statement on Non-Financial Information and Sustainability Information (pages 312 et seq.).

5. Due diligence process

Our approach is based on developing due diligence processes to detect the potential impacts of our activities on human rights. By means of continuous interaction with our stakeholders and sustainability teams on the ground, these processes are kept permanently up to date.

Collaboration with stakeholders and strategic partners has been a fundamental tool for spreading the concept of sustainability throughout the supply chain. It has materialized in projects, activities, actions and partnerships to ensure that our suppliers and manufacturers work in accordance with the responsible practices and values that define the Group and address the common industry challenges from the perspective of sustainable development.

The due diligence processes that are part of the human rights strategy involve two main focus areas: value chain, and supply chain.

Considering our business model, our supply chain is one of the priority areas of our overall value chain, in which we place a special focus on the promotion of and respect for workers' human rights.

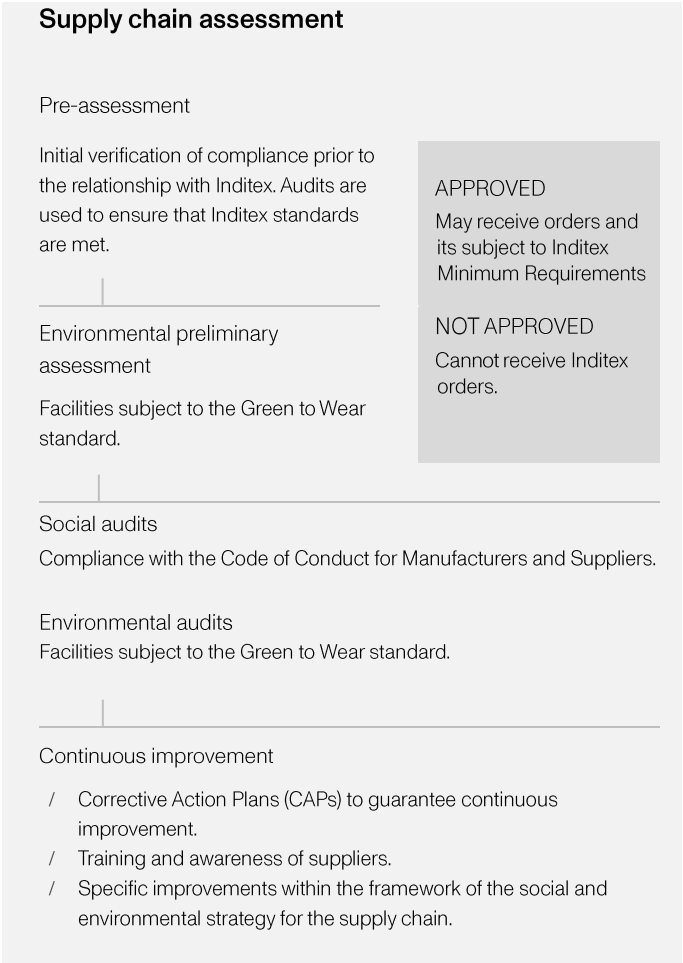
Inditex supports its social sustainability strategy with actions aimed at verifying and ensuring compliance with the Code of Conduct for Manufacturers and Suppliers – which states that any form of forced labour is expressly prohibited – and with international regulations. It does this in addition to working with suppliers and stakeholders to continuously improve the supply chain.

All the facilities used to produce the goods that Inditex places on the market must comply with the Code of Conduct for Manufacturers and Suppliers. To ensure this compliance, Inditex conducts different procedures and assessments regarding Human and Labour Rights among all of its suppliers and factories – chiefly through different types of audits.

¹ Figures include suppliers with more than 20,000 production units in the 2024 summer and winter campaigns, based on the primary data extracted from the Company's systems (suppliers with production of fewer than 20,000 units represent 2%).

² Recommendation No. 46 of the United Nations Economic Commission for Europe: Enhancing traceability and transparency of sustainable value chains in the garment and footwear sector.

³ Information on the criteria that fibres and materials must fulfil to be classified as lower-impact available in the Methodological Annex of [Inditex Group's 2024 Statement on Non-Financial Information and Sustainability Information](#).



Before starting a commercial relationship with Inditex, every potential supplier and manufacturer (even if they are not direct suppliers of the Group, but are part of its supply chain) is subject to a preassessment audit to verify, among other matters, that no violation of Human Rights of its workers exists, ensuring that only those who meet the Group's sustainability standards may become part of the supply chain.

During such pre-assessment audits, the prohibition of forced labour and child labour are verified. In 2024, Inditex carried out 2,175 pre-assessment audits of manufacturers who were potentially commencing business with Inditex.

Subsequently, every manufacturer in Inditex's supply chain is subject to periodic social audits. The methodology used in social audits was designed jointly with the former International Textile and Garment and Leather Workers' Federation (ITGLWF), (currently IndustriALL Global Union), the University of Northumbria (UK) and the Cambridge Centre for Business and Public Sector Ethics.

The main purpose of the social audits is to verify the level of compliance with the Code of Conduct for Manufacturers and Suppliers and to launch a Corrective Action Plan (CAP), where appropriate, to ensure respect for Human and Labour rights and remedy any detected noncompliance. Social audits can be conducted both by internal and external auditors, without previously announcing the specific date.

Each audit includes tools, inter alia, to identify any form of forced labour, and to verify issues such as employment documentation –including age verification-, freedom of movement and the termination of agreements, the use of agents for recruiting staff and their relationship

with the workers, including any potential payment of hiring fees, among others. 6,468 social audits were conducted in 2024.

These audits include the social audits carried out using Inditex's proprietary methodology and the audits carried out following the method of the Social & Labour Convergence Program (SLCP) initiative, of which Inditex has been a member since the inception of the Program.

As a result of the social audits, our suppliers and manufacturers are classified in a social ranking based on their degree of compliance with the Code of Conduct for Manufacturers and Suppliers (CCMS).

Classification	Audit results
A	Complies with the CCMS
B	Does not comply with some non-relevant aspect of the CCMS
Subject to CAP - C	Does not 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 2024, 94% of manufacturers were classified with A and B ranking.

Social audits also allow us to determine and identify the main challenges in each country in relation to the different aspects of the Code of Conduct, and this is also a valuable source of information for activities that are part of the Workers at the Centre strategy, as noticing the most critical issues in each geographic area lead to enhancing the due diligence process in the field of human rights.

Find out more in the [Inditex Group's 2024 Statement on Non-Financial Information and Sustainability Information](#) (page 314 et seq.) and in the specific report on [Supply Chain: management to transform the sector](#).

5.1. Enhanced Due Diligence

Inditex also carries out enhanced due diligence to identify potential human rights violations that may be especially complex to detect through standard social audits. If Inditex's due diligence system assesses that a potential breach of its standards exists or identifies any potential human rights risks in its supply chain related to forced or child labour, Inditex may terminate the business relationship and/ or block the affected supplier(s). It encompasses a holistic approach to sustainable supply management, which includes stakeholder engagement, capacity building and constant improvement through various initiatives. Additionally, it involves a thorough analysis of the entire corporate group and commercial relationships of all current and potential new suppliers and manufacturers.

More specifically, Inditex's enhanced due diligence includes:

- Analysing whether third parties are included on sanction lists;

- Analysing whether third parties have corporate or commercial ties with sanctioned entities;
- Analysis of any mentioned in reports published by NGOs or other institutions;
- Utilizing specialized computer/informational Human Rights warning tools;
- Utilizing tools to trace global transactions;
- Utilizing tools for assessing reputation issues;
- Conducting isotope testing to evidence the origin of the raw materials used in garment production.

Thanks to its enhanced due diligence system, the already strong control system gets reinforced, helping Inditex to identify potential risks of non-compliance with its standards.

Beyond supply chain, in line with the principles and criteria for action established in the Code of Conduct for Manufacturers and Suppliers, at Inditex we are firmly committed to preventing compliance risks from third parties with whom Inditex maintains a direct business relationship. In this regard, the Due Diligence Policy, approved by the Board of Directors in September 2019, is designed to align the relationships with our business partners, suppliers and large customers, with the processes described in the international standard ISO 37001 Anti-Bribery Management Systems in organisations, as well as the regulations and the most stringent standards on anti-corruption. The due diligence process regulated by the Policy consists of the identification and analysis of all suppliers, business partners and third parties with whom Inditex engages in business relations, from the perspective of corruption, fraud, international trade sanctions and/or any other risks of a similar nature.

All third parties that initiate a commercial and/or professional relationship with Inditex are subject to a due diligence process, which is more demanding depending on certain factors, such as: (i) the total estimated purchase volume with Inditex; (ii) the market in which the third party is domiciled and carries out its main activity; (iii) the sector to which it belongs; and (iv) their degree of interrelationship with authorities and public officials.

Furthermore, this year, within the framework of our human rights strategy and the application of due diligence processes in our value chain, during 2024 Inditex Group audited a number of the distribution centres Inditex works with, both in Spain and other markets. The procedure is the same as our social audit of the factories in our supply chain. In this regard, Inditex carried out 60 social audits of external distribution centres this year.

Inditex understands the importance of identifying the potential human rights impacts across its entire value chain and is constantly improving its processes to integrate and enhance due diligence.

Find out more in the [Inditex Group's 2024 Statement on Non-Financial Information and Sustainability Information](#) (pages 118 et seq.) and in the specific [Human Rights report](#).

6. Effectiveness and continuous improvement

At Inditex, we believe in continuous improvement as a key to advancing towards our goals and strategies. Management of the supply chain is

also consistent with this philosophy. One of our main tools for improving the performance of suppliers and manufacturers is the Corrective Action Plans, developed when non-compliances are detected in social and environmental audits, not only to establish measures to mitigate or remedy them, but also to prevent them from occurring in the future.

Developing a corrective action plan

Involvement throughout the process of sales teams, trade unions, NGOs or other organisations where necessary.

Start of the CAP

1. Launch
/ Analysis of points of improvement
/ Discussing the plan and setting out correction dates

2. Monitoring
/ Request/receipt/verification of evidence
/ Technical support
/ Desk review of the improvements and follow-up with the supplier and manufacturer

Control point or competence visit

3. Monitoring audit

Close of the CAP

/ Blockage
/ New rating

The precise duration of a Corrective Action Plan (CAP) is determined by the non-compliances found during the audit and the period deemed necessary to address them.

In the most sensitive cases—classified as being ‘Subject to Corrective Action Plan’—the plan lasts approximately six months, during which Inditex’s Sustainability teams and buying teams offer constant support to suppliers and manufacturers through two channels:

- Providing them with advice and expertise in regard to the best way to implement the corrective measures. In this regard, they may also have the support of other stakeholders, such as NGOs, trade unions or other civil society organisations.
- Continuously monitoring the CAP, including competence visits or control points, so as to act with the supplier before the established deadline if progress is not fast enough. Specifically, CAPs comprise the following stages:
- Initial meeting: at this meeting, any non-compliances detected are analysed, the action plan proposed by the supplier is discussed, and deadlines are established for the various stages of the process.
- Monitoring: before conducting the competence visit or control point, a double check is carried out with the supplier or factory (in the first and second months) to ascertain whether the factory has made any improvement. The supplier action plan must be completed:

- If non-compliances have been resolved: the improvement must be demonstrated with a clear explanation and photographic evidence or documentation, where relevant.
- If the non-compliances have not been resolved: a justification of the reasons should be included and, if there are no reasons or if there is no plan to resolve the non-compliances, the factory will be considered to be blocked preventing any supplier making an order for Inditex at this facility.
- Competence visit/control point: improvements (or lack thereof) by the factory are verified, and new findings are checked.
- Final monitoring: before the follow-up audit is carried out, the auditor will check with the supplier that all improvements have been made. The supplier's action plan must be completed with the submission of a clear explanation and photographic evidence or documentation to prove it.
- End of CAP: a follow-up audit is carried out to assess whether the non-compliances have been remedied and to determine the factory's new classification.

306 Corrective Action Plans were conducted in 2024, 223 of these plans were carried out in factories with a 'Subject to CAP - D' rating, and 83 at production centres with other ratings.

Blocking a supplier or a factory is a last resort. Inditex believes in ongoing collaboration and dialogue with our suppliers, as the basis of the mutual trust relationship that benefits both parties. Thus, the Company brings them support and collaboration so that they can improve their supply chains for the benefit of workers.

Inditex's support for suppliers and factories is not limited to carrying out the Corrective Action Plans where evidence of non-compliance exists, but instead, different courses of action are followed to prevent non-compliance and proactively seek continuous improvement. The Group seeks to have an ongoing collaboration with its suppliers while the relationship with them exists and work with them towards improving their own supply chains and promoting Human and Labour rights of their workers.

Find out more in the [Inditex Group's 2024 Statement on Non-Financial Information and Sustainability Information](#) (page 316) and in the specific report on [Supply Chain: management to transform the sector](#).

7. Workers at the Centre strategy

Although due diligence is a continuous process, the end of the cycle of the Workers at the Centre 2019-2022 strategy provided the ideal framework and context for a profound and systematised reflection to ensure that the new phase of the strategy is based on managing those actual and potential impacts that are of the highest priority.

For this due diligence review process, we have used various internal and external sources of information, such as surveys, interviews with key partners such as IndustriALL or the ILO, information on the social audits of our suppliers, analysis of legislation, reports on human rights trends and risks.

We have also harnessed our work and relationships in each of our suppliers' geographic areas. The process, carried out in accordance with the UN Guiding Principles on Business and Human Rights, involved all sustainability areas, local cluster teams and other

Company areas. The organisation Shift, a leading centre of expertise on the UN Guiding Principles, has also been involved.

Forced labour, child labour and modern slavery have been considered and reflected in the due diligence exercise.

Find out more in the [Inditex Group's 2024 Statement on Non-Financial Information and Sustainability Information](#) (pages 118 et seq.) and in the specific [Human Rights report](#).

The lessons learned during the implementation of the Workers at the Centre 2019-2022 strategy and the 2022 update of the due diligence exercise, were key in the design of the strategy Workers at the Centre 2023-2025.

This phase continues the focus on impact and engagement and places a stronger bias on transformation and development, with a public commitment to reach three million people.

It is structured through five Priority Impact Areas (PIAs): social dialogue, health, living wages, respect and resilience, and it strengthens the focus on vulnerable groups as direct recipients of the strategy, including women, migrants, people with disabilities or workers involved in the production of raw materials.

Impacts related to the environment and climate change have been included, ensuring a holistic perspective in respect for human rights, and incorporating issues such as migration and climate change, just transition and the future of work. Forced labour, child labour and modern slavery have also been considered and reflected in the due diligence exercise.

Just as in the previous phases, continuous collaboration and dialogue with our stakeholders and with the sustainability teams in clusters remain strategic for developing initiatives, responding to workers' current needs and, to the extent possible, anticipating future needs.

Each of these Priority Impact Areas has a general objective and different lines of action, which are materialised through activities and projects on the ground, developed by our in-house teams or together with the local and international organisations with whom we collaborate. 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 combine and interweave and, at different paces and scales, contribute to and are part of implementing the strategy.

All identified Priority Impact Areas are relevant in terms of oversight of the supply chain in the field of forced labour, as they have a special focus on vulnerable groups such as migrants and refugees, women, children or workers in the raw materials supply chain.

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.



/ Equity 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.

In particular, the Priority Impact Area of “Respect” -reaching more than 174,917 people and 369 suppliers and factories in 2024- works in two lines of action:

Respectful work environments free from any kind of violence and harassment

We carry out activities on an evidence-based approach, aimed at understanding the specific needs in both the workplace and the community to develop solutions to prevent violence and harassment. Hence, we foster a culture of respect as a preventive measure, while at the same time strengthening mitigation and remediation measures as necessary.

These are the main initiatives carried out in 2024:

- Training on respect and equality (Turkey)
- Training on the development of zero tolerance policies towards violence (Turkey)
- Working parent support programme (China)
- EDUCARE project (Morocco)
- Harmony project (Turkey)
- LGBTI+ Awareness project (Portugal)

- Parwaaz project - Disability management in the workplace (Pakistan)
- RISE Respect project (Bangladesh, India)
- Together Strong project (Turkey)
- Workplace Adaptation project (Turkey)

Fair recruitment and employment culture

Providing decent work and using fair recruitment and employment practices are among the key aspects of this Priority Impact Area. At Inditex we have a zero-tolerance policy towards child labour and any kind of forced labour. These topics are discussed in our Code of Conduct for Manufacturers and Suppliers, which specifies that the employment of children and any form of forced or involuntary labour in our supply chain.

Two key tools enable us to work and improve in these areas:

- Our continuous human rights due diligence process in the supply chain, which allows us to identify key aspects.
- Our various initiatives under the Workers at the Centre strategy, which play a crucial role not only in preventing these situations in the first place, but also in taking the necessary action if any breaches are detected.

Main initiatives in 2024:

- Sowbhagyam project (India).
- Remediation programme for migrant workers (Turkey).

Find out more in the [Inditex Group's 2024 Statement on Non-Financial Information and Sustainability Information](#) (pages 258 et seq.) and in the specific [Workers at the Centre 2023 report](#) (pages 45 et seq.).

7.1. Equity focus – how Workers at the Centre tackles most vulnerable groups

7.1.1. Protection of migrant and refugees

The textile industry performs a crucial role when it comes to providing job opportunities to vulnerable groups such as migrants, both from other regions within a country (internal migration) and from other nations, and especially for refugees, such as the Syrian refugees who have reached Turkey since the start of the Syrian conflict in 2011.

Their special vulnerability requires an approach ranging from measures to prevent, detect and, if appropriate, remedy any instance of forced or unlawful work, to fostering their integration both in the labour market and on a personal level, nurturing peaceful and collaborative environments at the factories in which people from different cultural backgrounds work together, in order to prevent conflict and overcome communication barriers.

A common denominator of our measures and programmes for the protection of migrants and refugees is a special sensitivity for listening, understanding and supporting the specific needs in each context, involving both the workers themselves and specialist organisations, and covering a broad spectrum of topics and types of measures, from prevention and training to remediation.

Inditex aims to raise awareness about the relevance of integrating migrants and refugees into the recipient communities by means of projects and the dissemination of best practices. To this end, Inditex collaborates in four different programmes with International Labour Organization, Support to Life (STL), Association For Social Development and Aid Mobilization (ASAM – SGDD), and United Work, respectively.

7.1.2. Zero tolerance for child labour

At Inditex we are committed to ensuring that our supply chain is free of child labour, and that is why we have established a series of policies and actions as a way of prevention, mitigation and remediation. All suppliers and factories are informed about this policy when they start their commercial relationship with Inditex, and compliance includes different approaches such as training, guidance, evaluation and remediation plans.

Specifically, the child labour remediation plan is a mandatory process implemented globally that is activated if a worker is found to be under the age stipulated in our Code. Suppliers and factories are responsible for developing and implementing a series of corrective actions following this communication and for reaching an agreement with the minor and their guardians, which includes providing schooling opportunities for the minor, paying them a living allowance until the age of 16, or employing an adult family member in their place, among other measures, to reduce the likelihood of them returning to work to support their family.

As these plans are implemented, they are continuously monitored by Inditex's internal teams, and external expert organisations may also be brought in to collaborate.

7.1.3. Women

At Inditex we believe that gender equality is not only a fundamental human right, but also an essential value for the sustainability of the supply chain and for development.

Consequently, for some years we have been working in the field of Gender, Diversity and Inclusion, for driving international standards linked to the ILO, including, but not limited to, the following: Equal Remuneration Convention (C100), Discrimination (employment and occupation) Convention (C111), Workers with Family Responsibilities Convention (C156), Maternity Protection Convention (C183), and Violence and Harassment Convention, 2019, and Recommendation (C190 and R206).

By means of various commitments in our supply chain, Inditex is creating a space to work directly at the factories, for changing gender equality practices in the workplace and also reaching female workers' families and communities.

All five Priority Impact areas have actions directed specifically at women's needs.

One example, in the Respect PIA, is the Sowbhagyam project in India. This project has two main goals: fostering increasingly better labour practices at spinning, weaving, fabric mills and processing facilities, and ensuring that all factory workers enjoy a safe environment free of any kind of violence and harassment.

Furthermore, there are several specific objectives:

- Improving recruitment practices at factories.

- Strengthening the Internal Grievance Committee to prevent, prohibit and redress.
- Improving access to grievance mechanisms available at the factory.
- Facilitating early identification and guidance for vulnerable workers.

The project was implemented starting with a detailed assessment of the needs to understand the specific challenges at supply chain factories in the Tamil Nadu region. This greatly enhanced the visibility with respect to the needs and, accordingly, the interventions were suitably adapted to meet them.

The project has reached 8,060 workers involving 12 factories and suppliers in India.

Find out more in the [Inditex Group's 2024 Statement on Non-Financial Information and Sustainability Information](#) (page 258 et seq.) and in the specific report entitled [Workers at the Centre 2023](#) (pages 44 et seq.)

7.2. Workers involved in the production of raw materials

While raw materials (both natural and man-made) are pivotal components in the creation of end products, their supply chain is highly complex and involves challenges linked to labour conditions, as well as development, prosperity and resilience. These challenges must be addressed both locally and globally, so a holistic approach is called for. This approach must encompass traceability, due diligence and a commitment to respect for, and promotion of, human and labour rights.

Developed in the Priority Impact Area of Resilience, and aiming for prosperous livelihoods, main initiatives carried out in 2024 for cotton farms and communities are:

- Public-private partnership with the International Labour Organization (India, Pakistan, Uzbekistan).
- Collaboration projects for promoting regenerative agricultural practices (India).
- Child & Women Friendly Mobile Areas project (Turkey).

In this regard, the Group has taken a holistic approach to protecting the rights of such workers, by joining forces with a number of players, including local and international organizations and communities themselves. As an example, to drive the progress of sustainability across the supply chain of cotton, Inditex works with other organizations in the sector, in addition to working with ILO under the Public Private Partnership (PPP) signed with Inditex in 2017 and renewed in 2023 to promote respect for human rights at work from cotton producers in different cotton producing communities. The five fundamental rights that ILO advocates for in its Declaration on Fundamental Principles and Rights at Work are:

Freedom of association and the effective recognition of the right to collective bargaining;

- The elimination of all forms of forced or compulsory labour;
- The effective abolition of child labour;
- The elimination of discrimination in respect of employment and occupation;
- A safe and healthy working environment.

Inditex thus contributes to sustainability across the supply chain of such workers. To achieve it, a cooperative approach with different stakeholders nationally and in the communities themselves is key.

7.2.1. Due diligence in the cotton supply chain

Based on our due diligence processes and in collaboration with various organisations, Inditex continues to work to ensure the absence of forced labour – to which Inditex has a zero-tolerance approach – as well as to promote compliance with international standards and our Code of Conduct for Manufacturers and Suppliers including in the raw materials supply chain. Inditex has developed and applies strict policies and actions with the ultimate goal of fostering respect for the human rights of all workers in our supply chain.

Our compliance programme, together with the activities related to the 'Workers at the Centre' strategy, and our close partnerships with stakeholders such as the ETI or ILO strengthen our commitment to the prevention of forced labour. Inditex remains committed to the involvement of and dialogue with relevant stakeholders (both local and international) to identify opportunities to prevent negative impacts on workers' lives.

For this reason, Inditex takes action at the following levels:

- At community level: by means of the Public Private Partnership with the ILO to enhance Human and Labour rights within the cotton supply chain covering the fundamental rights and principles at work, including the prevention of forced labour.
- At industry level: as established in the UN Guiding Principles on Business and Human Rights and in collaboration with relevant stakeholders, the Group works to promote the Human and Labour rights of workers within the global textile supply chain.

Find out more in the [Inditex Group's 2024 Statement on Non-Financial Information and Sustainability Information](#) (page 196 et seq.) and in the specific report entitled [Workers at the Centre 2023](#) (pages 71 et seq.)

8. Mitigation and remediation

The factories in Inditex's supply chain are subject to thorough reviews to detect the existence of workers from especially vulnerable groups and assess their social and working conditions. Inditex has developed remediation plans where refugee or migrant workers are found to be working or living in conditions that do not adhere to its standards.

For example, in collaboration with the local NGO Refugee Support Centre (MUDEM), remediation plans in Turkey began with a detailed assessment of the working and living conditions of refugee and migrant workers through individual meetings. Specific actions were considered with a view to improving living conditions if any vulnerability or violation of basic human rights was detected. The main objective was to ensure that these workers are supported by valid work permits and social security, as well as to facilitate their integration, for instance by removing language barriers. Guidance is also provided if any other needs are identified, such as psychological support services.

Where the presence of migrant and refugee workers is identified, Inditex sets in train, where necessary, remediation plans in collaboration with local expert organizations in the field, to guarantee respect for their human rights and legalize their status.

We have collaborated closely since 2016 with MUDEM, which has been providing social and legal support to asylum seekers in accessing their rights and services for refugees and migrants.

The main action lines of the remediation plans are:

- Assessment and effective verification of working conditions
- Supporting workers' integration
- Support in obtaining work permits
- Advice and support in every aspect of their lives

Inditex also counts with a specific child labour remediation plan, a mandatory process implemented globally, that is activated if a worker under the age established in the Code is identified. In the event that a breach is detected, auditors communicate this information to Inditex's internal team. Suppliers and factories are responsible for developing and implementing a series of corrective actions following this communication and for reaching an agreement with the minor and their guardians, which includes providing schooling opportunities for the minor, paying them a living allowance until the age of 16 to reduce the likelihood of them returning to work to feed their family, or employing an adult family member in their place, among other measures.

In the development of these Plans, there is ongoing monitoring by Inditex's internal teams, and external expert organisations may also be invited to collaborate.

9. Training and awareness-raising

A strong culture of sustainability in all areas of the Group is essential to the successful implementation of our business model. To instil a culture of sustainability among all employees, regardless of their position and duties, the Company carries out training to our employees at headquarters, stores, logistics centres, and in the different markets where Inditex operates.

As part of their onboarding process, every employee at headquarters receives training on social and environmental sustainability, to ensure that they understand the basic idea of sustainability and its relevance for the Inditex Group.

After this initial approach to sustainability, employees undertake specific training depending on their roles and responsibilities. Training in this regard is essential for our buying teams due to the impact of their decisions on the sustainability of our products and supply chain. Such training covers responsible purchasing practices and their influence on employee rights.

In this regard, in 2024 as part of our space dedicated to sustainability training and innovation, The Sustainable Fashion School (SFS), we completed the first and second editions of the Foundations of Textile Manufacturing Master's programme, devised in collaboration with the University of Leeds. The Sustainable Fashion School consists of a space for knowledge and inspiration where our buying and design teams are backed by a solid foundation of technical knowledge and access to the latest innovations in sustainability. More than 1,600 people from all the Group's brands have completed the course.

Additionally, the promotion of the corporate ethical culture and the Compliance Model of the Group is underpinned by the

implementation of training action adapted to the risk profile of the different groups of employees that form part of Inditex. In this regard, in 2024, the implementation of the holistic Compliance Training Plan has continued. This Plan includes training, awareness and sensitisation measures covering the priority Compliance risks to which the Group is potentially exposed. In particular, the goal is to ensure a homogeneous and robust oversight of mandatory training, which is enhanced by the creation of a compulsory training carousel on the corporate e-learning platform, TraIn. This is a dedicated space that hosts compulsory training courses in specific areas, such as Compliance (which includes training on the Codes), Diversity and Inclusion, and Health and Safety.

Training and raising awareness among suppliers are also key to making progress towards the joint continuous improvement of the supply chain from the perspective of Human and Labour rights. Inditex's Sustainability teams advise suppliers through constant communication and training to share the Group's values, to raise awareness of respect and promotion of Human Rights and workers' wellbeing. Training programmes include topics relating to procedures and requirements of the Group, including the Code of Conduct for Manufacturers and Suppliers, and to priority impact areas identified through due diligence.

Likewise, in 2024 a Compliance e-learning training course –including as content the Codes of Conduct, the Ethics Line, and the Integrity Policies,, has been made available to the main product suppliers across 30 markets, which will allow the Group to convey the principles and behaviour guidelines the Company expects from the main product suppliers within the framework of our commercial or professional relations with them.

In addition, individual awareness-raising and group training is also provided, the latter run by internal teams or in partnership with reputable organizations with various specialisms.

Find out more in the [Inditex Group's 2024 Statement on Non-Financial Information and Sustainability Information](#) (pages 246 et seq.) and in the specific report on [Workers at the Centre 2023](#).

10. Grievance and queries mechanisms

The third pillar of the Inditex Group's Human Rights strategy, together with the Policy on Human Rights and due diligence, is the grievance and queries mechanisms.

Inditex's main grievance mechanism is the Ethics Line, which is managed by the Ethics Committee. The Ethics Line, which is strictly confidential, is an 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 through which they may raise, anonymously if they wish:

- Questions and/or doubts on the interpretation or application of the Group's Code of Conduct and the Code of Conduct for Manufacturers and Suppliers, as well as any other internal rules of conduct within the remit of the Ethics Committee.
- Breaches and other non-compliances relating to infringements of the applicable legal system or of the Codes of Conduct or of any other internal rule of conduct within the remit 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.

The Ethics Committee is responsible for overseeing the Ethics Line and launching any necessary investigation, and for proposing the relevant remediation, prevention and awareness-raising measures, as the case may be. The decisions of the Ethics Committee, as a collegiate and independent body, are binding upon the Inditex Group and on the persons to whom they are addressed, where applicable.

As mentioned above, the Ethics Committee is the internal body responsible 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 in 2023). This Policy and Procedure incorporate international best practices in connection with human rights and adapt the Ethics Line to the regulatory requirements of the markets in which the Group operates.

The Policy on Internal Reporting Channels and the Ethics Line Procedure provide the following safeguards and protections for persons concerned:

- Utmost confidentiality
- Presumption of innocence and preservation of the right to honour for the persons affected by the report
- Non-retaliation
- Appropriate use of personal data processed
- The parties' right to be heard

In keeping with best practices in this regard, in 2023 a tool provided by an external supplier was commissioned and placed into operation to receive and handle communications from the Ethics Line. This tool is accessible 24 hours a day, 7 days a week, and is available in more than 20 languages.

In 2024, the Ethics Line (including both the Global Ethics Line and the various Local Ethics Lines) recorded a total of 791 concerns (515 concerns in 2023). The total number of cases processed by the Ethics Committee does not include those that were rejected because they do not fall within its scope.

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.

Find out more about the Ethics Committee and the Ethics Line [here](#).

In addition, the Global Framework Agreement (GFA) executed with IndustriALL Global Union signed in 2007 and renewed in 2019 is a testimony of the commitment of the Group and IndustriALL to the promotion of labour rights in the textile and footwear supply chain, and with compliance with international labour regulations and our own Code of Conduct for Manufacturers and Suppliers. Our agreement

and relationship with IndustriALL also cover mechanisms to listen to and escalate concerns relating to labour standards. Inditex relies on social dialogue as a key mechanism to promote mature labour relations within our supply chain.

Inditex is fundamentally committed to preventing modern slavery, child and forced labour at all levels within its value chain, in particular, its supply chain. The Group strongly believes that this individual commitment is strengthened by a collective approach including through collaboration with governments, the fashion industry, society as a whole, and other stakeholders.

