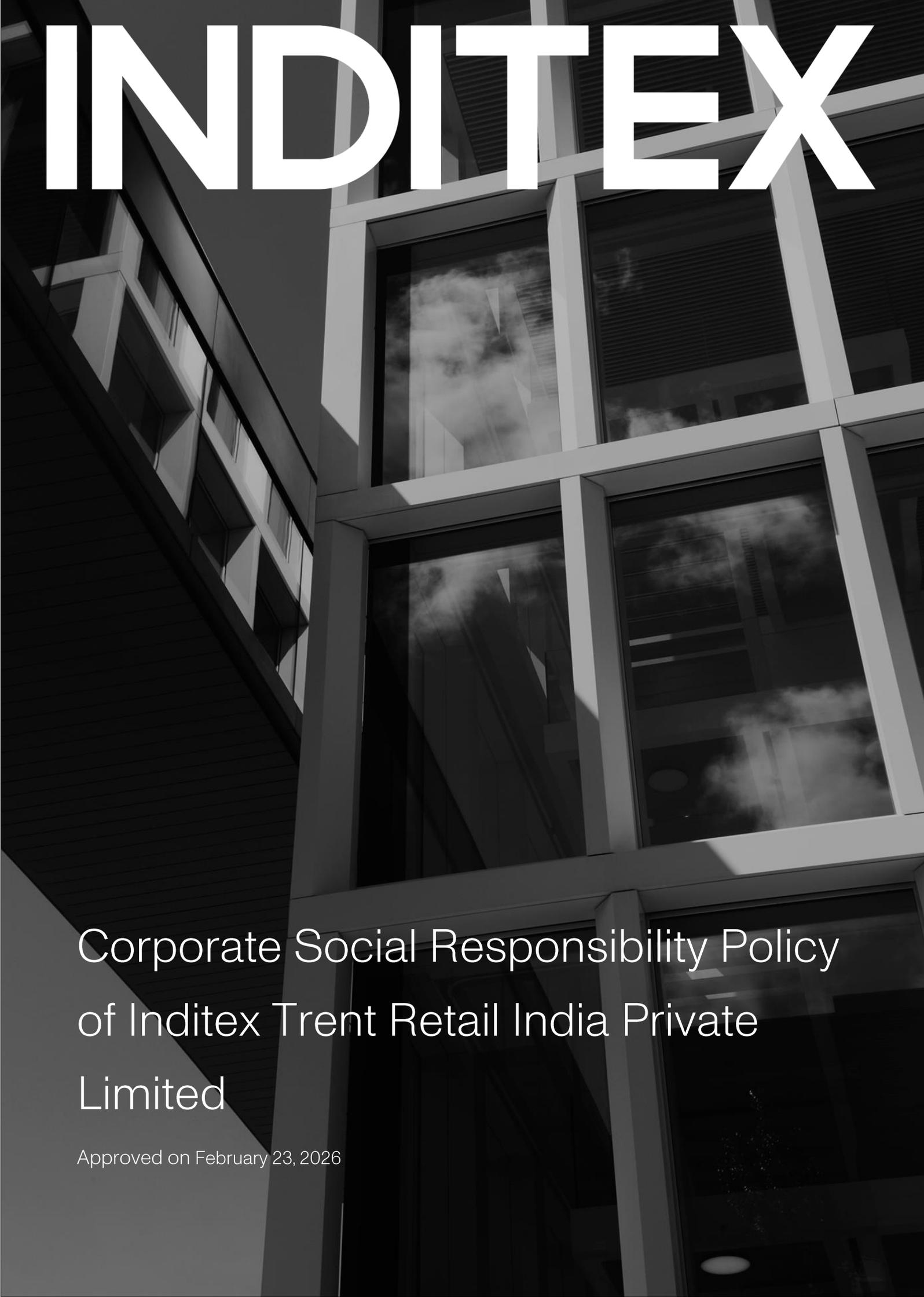


INDITEX



Corporate Social Responsibility Policy of Inditex Trent Retail India Private Limited

Approved on February 23, 2026

About this Policy

Name	Corporate Social Responsibility Policy of Inditex Trent Retail India Private Limited
Overview	This Policy regulates the corporate social responsibility of Inditex Trent Retail India Private Limited as per the Companies Act, 2013. This Policy is also in line with the group-wide Community Investment Policy and its corporate citizenship/philanthropy strategy and its main priorities.
Theme	Community Investment, Sustainability
Scope	Inditex Trent Retail India Private Limited
Type	Policy
Owner	CSR Department, Legal Department
Approved by	Board of Directors of Inditex Trent Retail India Private Limited
Approved on	February 23, 2026
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Comments	The Policy has been approved by the Board of Directors of Inditex Trent Retail India Private Limited.

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1. Background & Introduction

This Corporate Social Responsibility Policy of Inditex Trent Retail India Private Limited (hereinafter, this “Policy”) regulates the corporate social responsibility of Inditex Trent Retail India Private Limited (‘Inditex India’) as per the Companies Act, 2013. This Policy is in line with the Inditex Group’s Community Investment Policy and its corporate citizenship/philanthropy strategy and its main priorities.

The Inditex Group’s Community Investment Policy elaborates on the community investment related content of the Code of Conduct, Sustainability Policy and Human Rights Policy so as to align the Initiatives pursued by the Inditex Group in this field with the company’s business drivers, the United Nations Sustainable Development Goals and the Paris Agreement on climate change.

The Group’s Sustainability Policy defines the principles that govern how Inditex Group engages with all of its stakeholders, framed by the overriding goal of embedding sustainability practices into its business model, end to end, and a commitment to conducting all activities in a manner that is respectful of people, the environment and the broader community, as materialised in its pledge to upholding human rights and pursuing sustainable development.

In addition, the Group’s Human Rights Policy outlines Inditex’s commitment to upholding and championing human rights, as prescribed in the United Nations Guiding Principles on Business and Human Rights, and fostering their respect in its business communities.

2. Definitions

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

Inditex Group or the Group

The “Group” or the “Inditex Group” is made up of Inditex –as hereinafter defined- and the companies in which the Parent owns, directly or indirectly, at least 50% of their shares or voting rights.

Inditex (also, the “Company” or the “Parent”)

Industria de Diseño Textil, S.A. (Inditex, S.A.), the parent of the Inditex Group (as already defined), bearing Corporate Tax Number A15075062 and having its registered office at Avda. Diputación, Edificio Inditex, 15143, A Coruña, Spain.

Inditex India

Inditex Trent Retail India Private Limited, a private limited company, incorporated under the provisions of Companies Act, 2013 and having its registered office at Ambience Corporate Office Tower 2, Level 8, Plot No. 3, Unit No. 1 (Office 1), Ambience Island, NH-8, Gurgaon 122002, Haryana, India, bearing Corporate Identity Number U74900HR2009FTC043768, is engaged in the business of retail of garments, footwear, accessories, etc. Inditex India is a part of the Inditex Group.

Board

Board of Directors of Inditex Trent Retail India Private Limited.

CSR Committee

It's a committee constituted by the Board of Directors consisting of three directors

CSR

Corporate Social Responsibility

Community Investment Initiatives (also, "CSR Initiatives" or "Initiatives")

Philanthropic activities which respond to the commitment to contribute to the development of society and the care of the planet, especially in the geographical areas where the Inditex Group carries out its activity.

MIS

Management Information Systems

3. Scope of the Policy

The Policy is applicable to Inditex India pursuant to the provision of the Act.

4. Overarching Principles and Commitments

Inditex India is guided by the highest standards of corporate governance. Inditex India believes in 'inclusive development' and seeks to continue to be a good corporate citizen in various aspects of its operations and activities.

Inditex India is a part of the Inditex Group. As stated in Inditex Group's Code of Conduct, its Corporate Social Responsibility (CSR), understood as its social and environmental commitment in the

development of its business activity, to the benefit of all its stakeholders, forms an inseparable part of its business model. As a responsible business entity, Inditex India takes pride in being socially inclined and focused on sustained and effective CSR Initiatives. Based on this philosophy, Inditex India has webbed its vision and mission on its CSR Initiatives.

5. Objectives. Initiatives

The overall objective of this Policy is to elaborate on the Initiatives in line with content of the Inditex Group's Code of Conduct, Community Investment Policy, Sustainability Policy and Human Rights Policy so as to align the initiatives pursued by the Inditex Group in this field with the company's business drivers.

The Policy aims to encourage:

- / Committed improvement of community wellbeing.
- / Maximisation of community value generation.
- / Construction of strategic alliances to unlock progress on sustainable development through pooled resources.

Keeping the above ultimate goals in view, Inditex India endeavours that all initiatives undertaken by it should have an impact on the beneficiaries in improving their lives. The initiatives also should be replicable, scalable and sustainable on a long-term basis. In line with this objective and keeping in mind its operations, Inditex India aims to focus on impacting lives and livelihood. Accordingly, Inditex India has identified the following focus areas for its CSR Initiatives which would also fall within the activities approved under Companies Act, 2013 and rules made thereunder (**the Act**).

Initially, Inditex India intends to focus its CSR Initiatives on the following areas:

- / Contribution to the Prime Minister's National Relief Fund or any other funds set up by the Central Government for socio-economic development.
- / Eradicating poverty, hunger and malnutrition, promoting health care including preventive health care and sanitation, making available safe drinking water and undertaking rural development projects.
- / Promoting education, employment enhancing vocation skills and livelihood enhancement projects especially among children, women, elderly and the differently abled.
- / Promoting gender equality, empowering women and senior citizens, and undertaking measures for reducing inequalities faced by socially and economically backward groups.

- / Ensuring environmental sustainability, ecological balance, conservation of natural resources and maintaining quality of soil, air and water.
- / Other initiatives: in addition to the above, Inditex India could also undertake various other need-based initiatives in compliance with the provisions of the Act.

It shall however be ensured that activities, even if they fall within CSR Initiatives listed under the Act but are done by Inditex India in normal course of its business, shall not be considered as CSR Initiatives.

5.1. Project/Initiative selection

The project/Initiative selection criteria of Inditex India will be as follows:

- / The **value creation for both beneficiaries and stakeholders** in terms of expected outputs and impacts.
- / The level of **reputation, transparency and best practices** associated with the organisations executing the projects.
- / The **sustainability of the Initiatives** at the economic and institutional levels so as not to create dependencies around the projects or entities involved. This criterion includes the definition of exit strategies once the projects come to an end.
- / **Fit with the contents of this Policy.**

5.2. Establishment of the CSR Committee

Under the Act, the Board shall establish a CSR Committee for Inditex India as per the below requirements and operational mechanisms, to support the monitoring of this Policy and execute the CSR initiatives:

- / The CSR Committee shall comprise three (3) members of the Board.
- / The CSR Committee members shall be appointed by resolution of the Board. Each member shall continue as a member until a successor is appointed, unless the member resigns, or is removed by resolution of the Board or otherwise ceases to be a member of the Board.
- / Where a vacancy occurs at any time in the membership of the CSR Committee, it may be filled by the Board.
- / The Chair of the meeting shall be chosen by the CSR Committee from among the members present in the meeting.

- / The Chair presiding at any meeting of the CSR Committee shall have a vote in all matters considered by the Committee. In the event of a tie, the motion is defeated.
- / The CSR Committee shall meet at least once a year.
- / A meeting of the CSR Committee may be called by two members of the Committee or by the Board.
- / A quorum for meetings of the CSR Committee shall be two members.

5.3. Inputs, outputs and impacts measurement

Inditex India believes it is essential to thoroughly measure the inputs, outputs and impacts of the Initiatives comprising its CSR activities.

To do so, CSR Initiatives are based on the following monitoring and review mechanisms:

- / The CSR Committee, or a person/team designated by it, shall outline the expected outcome and milestones that are expected to be achieved in each and every Initiative. Based on the same, the Board shall monitor the Initiatives from time to time in order to ensure their effective implementation. The designated person/team shall monitor the status of each project and report its findings to the management periodically.
- / The CSR Committee shall institute a transparent monitoring and review mechanism for the implementation of the CSR projects or programs or Initiatives undertaken pursuant to this policy. The review might include MIS and exception reporting at both local and regional levels, as well as periodic senior-level evaluations, the development of action plans, and ongoing monitoring of their progress.
- / Inditex India may adopt an evaluation and audit mechanism.
- / Besides evaluation, the CSR Committee shall also review its Initiatives and decide on the future course based on socio-economic baseline studies that would assess the needs and priorities of the community at-large and align its programs to meet the desired objectives.
- / Inditex India uses the Business for Societal Impact (B4SI) methodology.

5.4. Geographic scope of the Initiatives

Inditex India, through its CSR Committee constituted for the purposes of CSR Initiatives, will decide on the locations for CSR Initiatives. While the focus of CSR efforts will be in the local areas and areas around it where Inditex India operates, it may also undertake projects where societal needs are high or in special situations (such as in the case of natural disasters, etc.).

5.5. CSR Funds & Expenditure

The Board should ensure that at least 2% of average net profits of the last three years of Inditex India is spent on CSR initiatives undertaken by it.

In case at least 2% of average net profits of the last three years is not spent in a financial year, reasons for the same should be specified in the Directors' Report.

Any surpluses generated out of CSR Initiatives shall not be part of the business profits of Inditex India.

CSR expenditure will include all expenditure, direct and indirect, incurred by Inditex India on CSR Initiatives, including the expenditure undertaken on the same, either directly or through indirect implementing agencies in accordance with its approved CSR policy.

6. Roles and Responsibilities

The Board of Directors (or the "Board")

The CSR policy shall be monitored by the Board. The role of the Board shall include:

- / Form the CSR Committee per the Act and this Policy
- / Approve the CSR Policy recommended by the CSR Committee
- / Approve the annual action plan for the areas and amount of expenditure to be incurred on CSR Initiatives and alter it, during the financial year, based on a reasonable justification from the CSR Committee
- / Ensure implementation of the Initiatives under CSR.
- / Ensure the 2% referred above is spent.
- / Disclose reasons for not spending the amount (if and when applicable).
- / Monitor this CSR Policy from time to time.
- / If required, engage international organization(s) as prescribed under the Act for designing, monitoring and evaluation of the CSR projects/ programs

The Sponsorship and Patronage Committee

Inditex Group's Sponsorship and Patronage Committee is the body empowered with approving all contributions made under the umbrella of the Inditex Group's community investment strategy. It is made up of the General Counsel, the Chief Communication Officer and the Chief Sustainability Officer.

Inditex Group's Community Investment Department

Community Investment Initiatives are managed by Inditex Group's Community Investment Department, which also carries out an initial assessment before submitting a project to the Sponsorship and Patronage Committee for consideration.

CSR Committee

- / Formulate and recommend the CSR Policy to the Board which should indicate the initiatives to be undertaken by Inditex India.
- / Monitor the CSR policy from time to time and provide recommendations to the Board in case an update of the CSR Policy is needed.
- / Formulate and recommend to the Board an annual action plan along with the CSR expenditure to be incurred on the CSR Initiatives.
- / Execute the CSR activities being undertaken in accordance with the annual action plan. On reasonable grounds, during the financial year, recommend alterations in the annual action plan to the Board when needed.
- / Ensure that this Policy is being followed and that the Inditex Group's Community Investment Department and The Sponsorship and Patronage Committee are being engaged in the process as per their roles and responsibilities stipulated in this Policy.

Chief Financial Officer (or the person responsible from financial management of Inditex India)

The Chief Financial Officer (or the person responsible from financial management of Inditex India) of Inditex India shall confirm to the CSR Committee and the Board that the CSR funds have been spent/ utilized in accordance with the annual action plan.

Internal Audit Department

Pursuant to the Internal Audit Charter and its Annual Activities Plan, Internal Audit Department may carry out audits to verify compliance with this Policy.

7. Queries

Any person of Inditex India may contact the CSR Department or the Legal Department of Inditex India for advice or to resolve any questions.

8. Violation

Violation of this Procedure may result in serious consequences to Inditex India and anyone in it, in such cases, corrective or disciplinary measures may be taken in accordance with the applicable laws.

9. Circulation/Disclosure

This Policy is available on the Inditex India's website: www.zara.com/in/ and Inditex Group's intranet (INET).

10. Oversight and Monitoring

Inditex India will be subject to periodic reviews and monitoring, including but not limited to, audits developed by the Internal Audit Department, to assess compliance with this Policy.

11. Update and Review

This Policy with the approval of the Board will be reviewed periodically and updated/amended as required in order to adapt it to any legal developments and incorporate any practices deemed necessary, likewise fine-tuning it for any changes in the Group's business model, internal operations or market context, with the collaboration of the General Counsel's Office – Compliance Department.

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