

INDITEX

Inditex Group Modern Slavery,
Human Trafficking and
Transparency in Supply Chain
Statement FY2021

Inditex Group is fully committed to respecting, promoting and protecting Human Rights across its entire value chain, and this forms one of the main pillars of its business model. Inditex does not tolerate any form of modern slavery or human trafficking in its organization or in its supply chain and pledges to play an active role in promoting human rights and proactively work towards respecting them.

This Statement constitutes "Inditex Group Modern Slavery, Human Trafficking and Transparency in Supply Chain Statement" for the year ended on 31 January 2022 and refers to both Industria de Diseño Textil, S.A. (Inditex, S.A.) and its subsidiaries (the "Company", "Inditex" or the "Group"). It was approved by the Board of Directors in the meeting held on 7 June 2022 following a favourable report of the Sustainability Committee and after the acknowledgment of the Social Advisory Board.

This Statement, made pursuant to section 54 of the UK Modern Slavery Act 2015, section 14 of the Australia Modern Slavery Act 2018 (Cth), and the California Transparency in Supply Chains Act 2010 (SB-657), addresses the measures on which the Group relies to prevent, mitigate and remedy the risk of modern slavery and human trafficking in its supply chain.

Inditex's Board of Directors is ultimately responsible for ensuring respect and protection of Human Rights, as an essential instrument for the sustainable development of the Group.

The Group formed a Sustainability Committee in 2019. This consulting and advisory board committee is responsible for advising the Board on matters within its purview, overseeing and monitoring social and environmental sustainability activity, the areas of the health and safety of products that the Group sells, and on relations with stakeholders in the field of sustainability, including matters relating to the implementation of the Group's Human Rights strategy.

Inditex also relies on a Social Advisory Board, which advises it on sustainability issues, and is composed of external independent members. 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 Committee of Ethics, which reports to the Board of Directors through the Audit and Compliance

Committee, is in place to ensure compliance with the Group's Code of Conduct and Responsible Practices and with the Code of Conduct for Manufacturers and Suppliers (hereinafter, the "Codes"). This Committee also manages the Ethics Line, a queries and grievance mechanism that reinforces due diligence by helping to identify and remedy any potential negative impact on Human Rights, thereby strengthening the relationship with stakeholders. The Policy on Human Rights, Due Diligence and the Ethics Line 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.

About us

Inditex is a global fashion, design, distribution and retail company which aims to offer its customers clothing, footwear, accessories and home wear that meet the most demanding design, safety, sustainability and quality standards, at affordable prices. The company has implemented a business model defined by its flexibility and efficiency, its innovative nature and its sustainability approach in all its process. In this regard, Inditex conducts its business within a framework of respect and transparency, in continuous dialogue with our stakeholders, based on promoting human rights, and with the ultimate purpose of having a positive impact on customers, society, the industry and our environment.

Inditex strives to combine an efficient, sustainable and integrated economic model that generates opportunities for improvement for our entire ecosystem while minimizing resource consumption, thus decoupling economic performance from its imp.

Inditex Group has seven brands: Zara, Pull&Bear, Massimo Dutti, Bershka, Stradivarius, Zara Home and Oysho. Each brand has its own distinct personality, style and design team and directly manages their own integrated store and online sales platform. Inditex is present in more than 200 markets across five continents.

Our Code of Conduct and Responsible Practices sets out the values and principles that guide our actions and relationship with our customers, shareholders, partners, suppliers and all the communities where Inditex is present.

People are the key factor in our business model: both our customers who purchase our products, and all those people who place their talent at the service of our customers: our employees. The Company currently has 165,000 people of 177 nationalities, working with the utmost commitment to the values that define the Group: enthusiasm, entrepreneurial spirit, non-conformism, innovation, inclusion and humility.

Over time, Inditex has developed a unique business model based on flexibility, integration, sustainability, creativity and innovation. We are a reference in fashion, having achieved a global presence based on an integrated business model that sets us apart from the rest of the industry. Constant change, and the resulting need to adapt to trends and volumes, is the factor that has defined our Group's business model, which is unique in the sector, and the key to our Company's commercial success.

Inditex is actively present at all stages of the value chain, including design, production, logistics, stores and customers.

Find out more about Inditex Group [here](#).

Inditex supply chain

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

Our supply chain is present globally, organised through 12 clusters of suppliers – spaces for cooperation and dialogue that aim at promoting sustainable production environments in each strategic geographic area and in a framework of respect for Human and labour rights, although many of manufacturers are close to our design centres in Spain. 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 and responsibility 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 our suppliers and takes part in multilateral dialogue with organizations and institutions in the field.

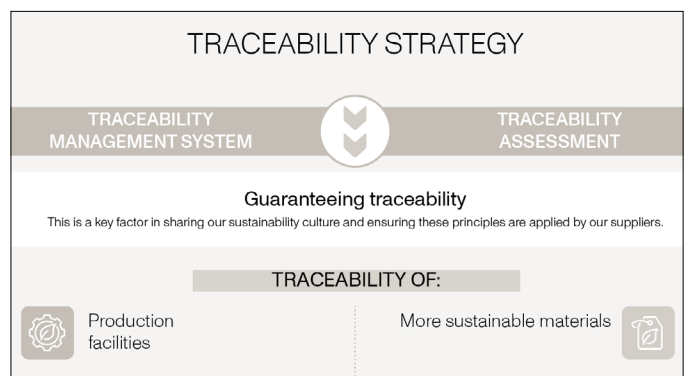
In 2021, Inditex's supply chain comprised 1,790¹ direct suppliers who in turn used 8,756² factories for the productions of the Group.

Inditex has put in place concrete monitoring and assessment tools and systems to ensure that none of its suppliers is directly or indirectly involved in any violation of labour rights. But Inditex goes beyond monitoring and assessing, by working on the basis of continuous improvement. Inditex strongly believes that working with suppliers to consistently improve delivers the best outcome for workers, but, on the other hand, if suppliers fail to make changes or improvements where necessary, the Company relies on appropriate procedures and measures to ensure sustainability across its supply chain.

As part of this process, the Group is committed to working with local and international expert stakeholders to uphold and safeguard labour standards across the entire supply chain.

The traceability of the supply chain is a first and essential step. On account of its global supply chain, Inditex strives to identify each and every player involved in the production of goods, to ensure that they all meet the Group's strong sustainability commitments.

To achieve traceability of the supply chain, Inditex follows two main lines of action: the traceability management system and the traceability assessment:



1. Traceability management systems are based on

¹ Suppliers of fashion items with a production of over 20,000 units/year in the 2021 Spring/Summer and Fall/Winter campaigns. Suppliers with lower productions account for 0.25% of total production.

² Factories declared by the suppliers in the product traceability system for 2021 orders.

requiring from our suppliers that they share with us the full information of their supply chain, which will be recorded in our systems to be subsequently reviewed and approved. Information about social performance and performance in the field of human rights of each production facility is found in such systems.

2. Traceability assessments seek to establish that the information provided by the suppliers is true and correct and that all production processes are carried out in previously registered and approved facilities. Thus, unannounced visits take place to factories to subsequently check with the traceability tool whether the findings from the visit match the information entered in the traceability tool. 6,119 traceability audits were performed in 2021.

[Find out more on pages 202 et seq. of Inditex Group's 2021 Statement on Non-Financial Information](#)

Policies and commitments

Internal responsibility and certification

Inditex applies a zero-tolerance policy on slavery, human trafficking and any form of forced labour in its supply chain.

Policies and internal regulations

Policy on Human Rights of Inditex Group

Inditex Group's Policy on Human Rights 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.

In the framework of the United Nations Guiding Principles on Business and Human Rights, the Policy on Human Rights 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 Policy on Human Rights. In this regard, such Policy reads: "Inditex 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 Inditex. 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."

Compliance with Inditex's Policy on Human Rights 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 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 Policy on Human Rights can be found [here](#).

Sustainability Policy of Inditex Group

The Sustainability Policy defines the principles that sustain the relations of the Group with all its stakeholders, favouring the integration of sustainability practices within its business model, on the premise that its business activity is carried out with full respect for people, the environment and the community at large, based upon the commitment the Group has made to respecting human rights and to sustainable growth.

The Sustainability Policy was approved by the Board of Directors on 14 December 2020. It results from the merger and update of the former Corporate Social Responsibility Policy and Environmental Sustainability Policy, both of which were approved in 2015, consolidating them into a single policy.

The Policy addresses:

- / The principles which govern the Group's sustainability.
- / Integration of sustainability within the business model and the pillars upon which value is built up.

/ The main stakeholders of the Group and the principles which govern its relations with each of them.

/ The principles that guide disclosure of sustainability practices. Permanent dialogue and transparency are the core principles that govern Inditex's relations with its stakeholders.

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

Code of Conduct and Responsible Practices of Inditex Group

The Code of Conduct and Responsible Practices (also known simply as the 'Code of Conduct') establishes Inditex's ethical commitments and sets transmitting the corporate ethical culture to all internal and external stakeholders is paramount for Inditex, which has in place internal regulations to nurture the development of an ethical, efficient and competitive business model. Its goal is to secure a professional, ethical and responsible commitment from Inditex and all its employees, in the course of its activities anywhere in the world, as a basic element of its business culture underpinning the training and personal and professional well-being of its employees. To this end, it defines the principles and values that must govern the relationships between the Group and our main stakeholders: employees, customers, shareholders, business partners, suppliers and those communities in which Inditex implements its business model.

Approved in 2012 by the Board of Directors, this 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.

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

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 established the framework that governs their relationships with Inditex.

Before commencing work for Inditex, all suppliers accept and undertake to meet (and to enforce compliance by the

facilities they work with) the Inditex Minimum Requirements, which include compliance with the Inditex Code of Conduct for Manufacturers and Suppliers, - among other policies and standards - which explicitly prohibits slavery and human trafficking and is based on applicable national laws and international standards in the field.

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

Criminal Risks Prevention Model

Within its Compliance system, Inditex also has an organisation and management model for the prevention of crimes or "Criminal Risk Prevention Model", with the aim of reducing exposure to the risks related to the potential commission of crimes typified in the Spanish Criminal Code and, in particular, those related to human beings' trafficking. This Model, in constant evolution and adaptation, is made of the Criminal Risk Prevention Policy and Procedure, as well as the Criminal Risk and Control Matrix.

In this regard, the Policy on Criminal Risks Prevention was approved by the Board of Directors on 19 July 2016, following a favourable report of the Audit and Compliance Committee (formerly, the Audit and Control Committee).

The Policy on Criminal Risks Prevention seeks to exact an ethical and responsible standard or professional conduct from the Group and its entire workforce everywhere around the world and, in particular, to prevent the commission of any criminal offences, including offences related to human trafficking.

This Policy addresses the commitments to ethical and responsible conduct covered in the Code of Conduct of

Responsible Practices, establishing a link between such commitments and the prevention of criminal offences and acts by employees and the Group.

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

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

Commitments and initiatives

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.

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.

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.

Global Framework Agreement with IndustriALL

The Global Framework Agreement (GFA) was signed in 2007 by and between Inditex and IndustriALL Global Union, the International Federation of trade unions which represents 50 million workers in 140 countries. The GFA protects and promotes best working conditions throughout

the entire supply chain. It represented a key milestone in the industry as the first agreement to extend to a global supply chain and to create a space for the exchange of ideas and procedures regarding workers' rights. The GFA was renewed in 2019.

In 2021, a dialogue and queries process was opened with the Global Union Committee, set up in 2020, to continue reinforcing the participation of local members of IndustriALL in the Agreement.

UNI Global Union

In 2019, Inditex and the trade union federation UNI Global Union, which represents 20 million workers in more than 150 countries, celebrated the 10th anniversary of the Global Agreement reached by both entities in 2009 to foster respect for and promotion of labour rights and decent work across the commercial and distribution network.

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

Entered into in 2017, 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 capacity building and raising awareness among cotton communities.

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.

Participation in United Nations Global Compact Decent Work in the Global Supply Chains Platform

In 2021, Inditex has been part of the United Nations Global Compact Decent Work in the Global Supply Chains Platform. This is an alliance of companies and other agents which seeks to make progress by means of collective actions to ensure decent work conditions and to eradicate forced labour, modern slavery and child labour.

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.

COVID 19: Action in the Global Garment Industry

An initiative aimed at encouraging action in the global textile sector to help industry cope with the economic impact of the coronavirus pandemic, while promoting the protection of the incomes, health and employment of industry workers. This call to action was agreed in 2020 by the International Organisation of Employers (IOE), the International Trade Union Confederation (ITUC) and IndustriALL Global Union together with international brands, and with the technical support of the International Labour Organisation (ILO). Inditex is part of the International Working Group created for its implementation.

In 2021, Inditex has continued to pursue the main lines of action:

/ Fostering social dialogue and access to employment protection systems and revenue

/ Strengthening social protection systems

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.

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.

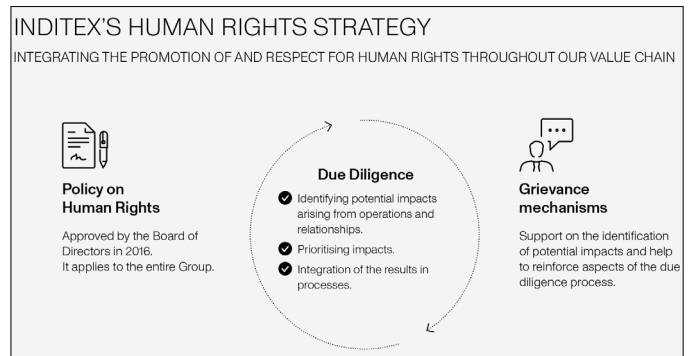
Country partnership for zero child poverty

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](#).

Due diligence process

Due diligence process is the second main pillar of Inditex's human rights strategy (the Policy on Human Rights is the first, and queries and grievance mechanisms, by means of the Ethics Line, the third).



Due diligence is the process used for identifying potential negative impacts on human rights across the Company's value chain and their subsequent prioritization, for the purposes of integrating the findings into the different processes of the Group. This process is permanently updated to bolster the strategy implementing mechanisms allowing us to prevent and mitigate at any time any risk in the field.

In view of the nature of our business model, Inditex works in two lines:

/ Due diligence in the value chain

/ Due diligence in the supply chain

Find out more in the 2021 [Statement on Non-financial Information](#) (pages 62 et seq.) and in the specific [Human Rights Report for 2021](#).

Due diligence in the value 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 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.

Since the beginning of the FY20, 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, Inditex understands the importance of identifying the potential human rights impacts across our entire value chain. In this regard, in 2021:

/ Inditex has continued implementing the relevant due diligence processes in Logistics and Distribution, which have materialized in operating actions such as assessments performed at distribution centres.

/ Processes have been designed to assess suppliers of non-product (suppliers of goods and services who are not part of the supply chain, i.e., not directly related to manufacture of products that Inditex places on the market), for the purposes of detecting and assessing, among others, their human rights related performance and setting from inception a dialogue process that addresses the co-responsibility of Inditex and suppliers in this field.

Due diligence in the supply chain

"Workers at the Centre 2019-2022" strategy

Inditex's social sustainability strategy "Workers at the

Centre 2019-2022" aims to generate a positive impact on workers in the supply chain, the main beneficiaries of the programmes and projects carried out by the Company. Responsible suppliers and worker empowerment are core to this strategy's success.

At the end of the year, the global progress of such strategic plan stood at 85%, with 1,366,420 workers reached via 46 projects at factories and/or in the community. 1,153 suppliers and factories were involved in the Workers at the Centre strategy in 2021.

The current strategy builds up on three elements:

1/ The workers: as the main beneficiaries of the plans and programmes implemented.

2/ Impacts from the strategy materialize on three worker-related dimensions of:

a/ The workplace: where respect for their human and labour rights must be ensured through collaboration, projects, evaluation, improvement and follow-up of the factories.

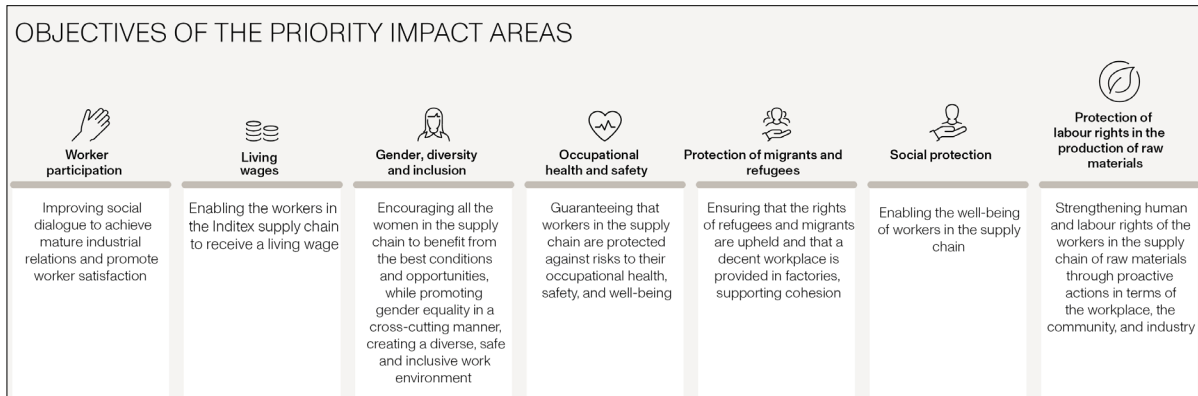
b/ Worker wellbeing: based on the experience gained at the factory level, Inditex implements more thorough and progressive programmes to impact and progress changes in the life of workers and their communities.

c/ The industry: this dimension strategically promotes efforts, helped by partnerships with different stakeholders (including NGOs, civil society, suppliers, industry peers, etc.) to drive systematic and effective changes at sector level to create a positive impact in the long run.

3/ Due diligence: as key element to identify priority impact areas in the field of human rights.

Inditex has identified via the due diligence process the seven Priority Impact Areas (PIAs) into which the "Workers at the Centre 2019-2022" strategy is structured. Such areas cover all the actions, activities and projects implemented for such strategy to thrive. Specific goals are tied to each PIA, and each of them is assigned a working group, charged with implementing each strand of the strategy. They are composed of local experts from the different clusters of Inditex. Each local team joins up to address global challenges in the industry and find solutions fit for the entire supply chain, that are also applicable locally taking into account the different realities in each region.

The seven PIAs are shown below:



Three of the seven PIAs identified stand out in terms of oversight of the supply chain in the field of forced labour, as they are addressed to especially vulnerable groups: protection of migrants and refugees, gender, diversity and inclusion and protection of labour rights in the production of raw materials.

[Find out more in the 2021 *Statement on Non-financial Information* \(pages 219 et seq.\), in the specific *Workers at the Centre 2021 report* and in the specific *Human Rights Report for 2021*.](#)

Protection of migrants and refugees

Migrants and refugees are especially vulnerable in global supply chains.

Thanks to the work carried out by the Company in the field of Protection of Migrants and Refugees, Inditex has benefited 40,828 workers and involved 115 suppliers and factories in the programmes, organised around three strategic lines.

Remediation plans for refugees and migrants

As mentioned before, 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.

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

In view of the current situation, these plans are especially significant in Turkey, where in 2021 Inditex has worked yet again with the local organisation MUDEM in their implementation: 104 remediation plans in 28 factories have been implemented, benefiting 1,839 workers.

The main action lines of remediation plans are:

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

Fair employment and recruitment practices for migrants and refugees

This action line focuses on having the suppliers in our supply chain resort to fair and just employment and recruitment practices in respect of all workers, whether or not they are migrant and/or refugees.

To achieve this, alliances are entered with local organizations aimed at raising awareness and build skills among managers, works and the communities where they all live.

An example of our work is the Sowbhagyam 2 programme, implemented in India in partnership with the local NGO SAVE, to assess the potential risks to which women workers at the spinning mills in the Tamil Nadu region are exposed, and to introduce the measures

needed to reduce them.

Strengthening social and labour cohesion

This strategic line of action seeks to encourage peaceful work environments, fostering cohesion of all workers, in particular within vulnerable groups.

Inditex aims to raise awareness about the relevance of migrants and refugees' integration in the receiving communities by means of projects and the dissemination of best practices. To this end, Inditex collaborates with ILO (International Labour Organization) in the "Buddy Programme", that offers support by providing tools to build their vocational, legal, social and cultural skills allowing for a better adaptation and granting them access to employment.

Another example is the "Facilitating egalitarian workplaces that create a peaceful life culture" project that Inditex has started in 2021 led by the Support to Life organization. Such programme revolves around implementing practices to create a peaceful coexistence environment, in addition to setting a road map to improve group cohesiveness by providing factories' managers with the required tools to manage it.

[Find out more in the 2021 Statement on Non-financial Information \(pages 238 et seq.\) and in the specific Workers at the Centre 2021 report \(pages 92 et seq.\).](#)

Preventing school drop-out

Inditex has implemented plans to prevent school drop-out. Inditex works with expert organisations such as CYDD (Association for the Support of Contemporary Living) and Istanbul Bilgi University to understand the relevant context and circumstances so as to then engage in dialogue with local authorities and other stakeholders.

Inditex also puts in place remediation plans to prevent potential situations involving workers who are not of minimum working age. As part of the procedure, suppliers must be in charge of educating the minors until they reach such age, in addition to providing work to other members of the minor's family or paying their family an amount equivalent to their wages.

Gender, diversity and inclusion

Women are one of the vulnerable groups more largely represented in our supply chain, and as such, more likely to have their social, labour and human rights violated.

The main goal of this PIA is promoting that all the women in the supply chain benefit from the best conditions and opportunities, while fostering gender equality in a crosscutting manner, and creating a diverse, safe and inclusive work environment.

The strategic plan in this field is based on three main pillars:

/ Health

The first pillar focuses on facilitating healthcare services, chiefly in maternity and reproductive health to all male and female workers in our supply chain.

/ Protection

The second pillar revolves around promoting zero tolerance policies and practices for the prevention and management of workplace harassment, thus protecting the most vulnerable groups, including women.

/ Empowerment

The third pillar refers to the involvement of female workers in programmes related to finance, leadership, and empowerment. Female workers should have all necessary tools to address any potential risk of violation of their human rights.

Thanks to the work done under the umbrella of this impact area in the year, 235,041 workers were benefited, and 109 suppliers and factories were involved in the various projects and actions.

[Find out more in the Inditex Group's 2021 Statement on Non-financial Information \(page 234 et seq.\) and in the specific report entitled Worker at the Centre 2021 \(pages 65 et seq.\).](#)

Protection of labour rights in the production of raw materials

Raw materials are the farthest link in the textile supply chain and the production process differs for each one. Considering this, workers in this sector therefore experience a different reality to workers in the factories of finished goods. Inditex has developed a strategy to protect labour rights in the production of raw materials which relies on three strategic action lines:

/ Promoting the well-being of workers in the supply chain of raw materials

/ Raising the responsibility on sustainability of all the players in the supply chain

/ Creating best practices and recommendations for the raw materials supply chain

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, such as Textile Exchange or Organic Cotton Accelerator, in addition to working with ILO under the Public Private Partnership (PPP) signed with Inditex in 2017 to promote respect for human rights at work from cotton producers in different cotton producing communities. The four 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.

The Company 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.

So far, Inditex has worked together with ILO in the cotton producing communities of India, Pakistan and Mali. In 2021, more than 23,094 workers of cotton producing communities have benefited from this work through awareness raising, capacity building programmes and dialogue on the working conditions of the workers in the cotton industry.

Due diligence in the cotton supply chain

In 2021, based on our due diligence processes and in collaboration with various organisations, Inditex has continued to work to ensure the absence of forced labour – of which Inditex has a zero-tolerance approach – as well as to ensure 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

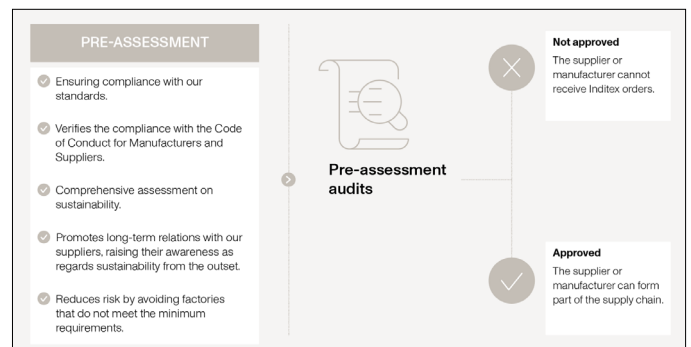
workers in our supply chain.

Our audit programme, together with the activities related to the ‘Workers at the Centre 2019-2022’ 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 2021 Statement on Non-financial Information \(page 242 et seq.\) and in the specific report entitled Worker at the Centre 2021 \(pages 110 et seq.\)](#)

Risk management

Suppliers' verification and audits

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.

Before starting a commercial relationship with Inditex, every potential supplier and manufacturer (although they are not direct suppliers of the Group, but they are part of its supply chain) is subject to a pre-assessment audit to verify, among others, 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, one of the elements reviewed is the prohibition of forced labour. In 2021, 2,397 pre-assessment audits of suppliers and manufacturers who were potentially commencing doing business with Inditex were carried out without being announced previously.

Subsequently, every supplier and factory in Inditex's supply chain is subject to periodic social audits. The methodology used in social audits was designed in 2017, 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 social audits is to verify the level of compliance with the Code of Conduct for Manufacturers and Suppliers and launch Corrective Action Plans (hereinafter, the CAP's), where appropriate, to ensure respect for Human and labour rights and remedy any detected non-compliance. Social audits can be conducted both by internal and external auditors, always without prior notice to the facility being audited.

Each audit includes tools, inter alia, to identify any form of forced labour, and to verify issues such as employment documentation, 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. 5,840 social audits were conducted in 2021.

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 2019-2022" strategy, as noticing the most critical issues in each geographic area may lead to enhancing the due diligence process in the field of human rights.

In addition to social audits, Inditex also conducts special audits, which focus on verifying compliance where a potential non-compliance with the Inditex Code of Conduct for Manufacturers and Suppliers is detected, for the purposes of preventing, monitoring or remedying any risks. 1,4081 special audits were conducted in 2021.

Lastly, within the framework of our human rights strategy and the application of due diligence processes in our value chain, during 2021 the Company audited a number of the distribution centres Inditex works with, both in Spain and other markets. The procedure is the same as for our social audit of the factories in our supply chain. In this regard, Inditex carried out 27 social audits of external distribution centres in the year.

[Find out more in the Inditex Group's 2021 Statement on Non-financial Information \(page 209 et seq.\) and in the specific report on Human Rights 2021](#)

Effectiveness and continuous improvement

To enforce the sustainability policies and procedures of the Group across the entire supply chain it is essential to work on the ground and understand the specific characteristics of each supplier region. This is why the supply chain management revolves around supplier clusters.

In this regard, the daily work of members of the clusters with suppliers and manufacturers is key to the continuous improvement of workers' working conditions. In addition to the action taken at each priority impact area for such purposes, Inditex relies on an important tool to optimize the supply chain from a perspective of respect and promotion of Human and Labour rights: the CAPs mentioned before.

Each audit immediately triggers a Corrective Action Plan that identifies the actions required by the supplier or the manufacturer to improve their compliance with the Code of Conduct for Manufacturers and Suppliers, as well as the time frame to implement them. These timeframes vary dependent on their severity and impact on workers' rights. Any supplier wishing to engage in a commercial relationship with Inditex is bound to action these Corrective Action Plans, and for these purposes, they rely on the full

support and dedication of Inditex’s Sustainability Teams. In addition to internal teams, other stakeholders such as NGOs, trade unions or other civil society organizations can be involved in such plans.

Corrective Action Plans mainly target:

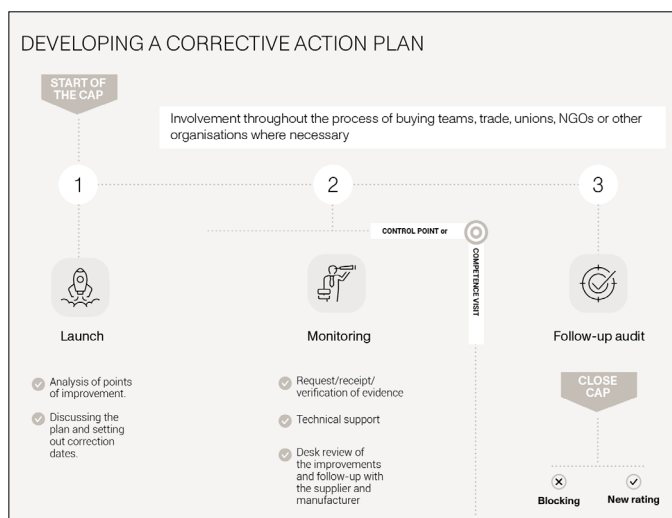
/ The establishment of measures aimed at mitigating and/or remedying potential non-compliances with the Code of Conduct for Manufacturers and Suppliers; and

/ prevention, to avoid further breaches in the future.

With regard to the most sensitive aspects of the Code of Conduct for Manufacturers and Suppliers, the duration of the Plan is approximately six months. Once this period is over, a new social audit is carried out to assess the degree of implementation of the corrective measures carried out. If it is found that the necessary measures have not been implemented, the factory or supplier is blocked within Inditex’s supplier management system and can no longer work for Inditex.

570 Corrective Action Plans were conducted in 2021, of which 294 were carried out in factories ranked as “Subject to CAP” and 276 in factories with other rankings.

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.



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 2021 Statement on Non-financial Information \(page 216 et seq.\)](#)

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 imparts training to our employees at headquarters, stores, logistics centres, and in the different markets where Inditex operates.

Every employee at headquarters receives training on social and environmental sustainability, and product health and safety, to ensure that they understand the basic idea of sustainability is 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 purchasing 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 2021, 15,600 employees received sustainability training.

Likewise, a new online training platform TRAIN was launched in October 2021 for all Inditex’s employees, available to all our people, with specific courses on Compliance and D&I. Zara Camp has been developed as part of such platform, and provides specific courses on different areas of sustainability.

Training and raising awareness among suppliers are also key to make 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.

Individual awareness-raising and group training is provided, the latter run by internal teams or in partnership with reputable organizations with various specialisms. Of note is the training run together with IndustriALL, the ILO, Better Work, Business for Social Responsibility (BSR), among others. In 2021, 260 training sessions were run to 521 suppliers in groups to provide them with the skills to foster a more sustainable supply chain.

From the perspective of the impact of responsible purchasing practices on the conditions of workers in the supply chain, such practices encompass purchase-related aspects, such as planning, price-fixing, terms of delivery to suppliers, or the business relationship with them, all of which has an impact on workers. Thus, buyers' teams play a significant role in the pursuit of a more sustainable supply chain. In 2021, 228 buyers and 28 heads of the commercial area of the different brands were trained in responsible purchasing practices.

[Find out more in the Inditex Group's 2021 Statement on Non-financial Information \(page 54.\) and in the specific report on Human Rights 2021](#)

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 grievance and queries mechanisms.

The Ethics Line (formerly, the Whistle Blowing Channel), managed by the Committee of Ethics, is the main grievance and queries mechanism of the Group. Any group employee, manufacturer, supplier or third party with a direct relation and a lawful business or professional interest at all levels and in all geographies (the "Parties Concerned") may use the Ethics Line, even in an anonymous manner:

- / To raise queries and doubts about the construction or enforcement of the Codes of Conduct, and of any other internal regulations of conduct of the Group falling within the remit of the Committee of Ethics;
- / To report any breach of the Codes and/or any other internal regulations of conduct affecting Inditex or its Group, which fall within the purview of the Committee of Ethics, and that it has been apprised of, by employees,

manufacturers, suppliers or third parties with whom Inditex is engaged in an employment, business or direct professional relationship.

The Committee of Ethics 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 proceedings of the Ethics Line are described in the Ethics Line Procedure.

The Ethics Line Procedure was amended in 2019 for the purposes of bringing some of its provisions into line with the regulatory requirements in the field of personal data protection and of rights of users of reporting mechanisms, as well as with best international practices in the field of Human Rights, and in ethics line and protection of rights of reporting parties. The Ethics Line Procedure explains and reinforces the guarantees and protective measures for the parties in the process, i.e.: (i) the utmost confidentiality; (ii) non-retaliation in respect of Parties Concerned acting in good faith; (iii) presumption of innocence and preserving the reported parties' honour; (iv) the parties' right to be heard; and (v) the appropriate processing of personal data gathered in the scope of the investigation.

In 2021, the Ethics Line processed 257 cases. Of these 257 cases processed by the Ethics Committee, 63 were linked to diversity and potential discriminatory behaviour or workplace/sexual harassment or other potential violations of fundamental rights. Of the cases closed after the relevant investigations, in four of the cases handled by the Ethics Committee, the existence of inappropriate conduct has been confirmed, although in none of the cases evidence of discriminatory and/or harassment has been observed, leading to the adoption of the appropriate measures, which in one case involved the termination of the employment relationship with the employee. In addition, in the closed cases, no human rights violations in relation to suppliers of goods and services were identified.

[Find out more about the Committee of Ethics 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, in essence, committed to preventing 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 industry, civil society and other stakeholders.

This Statement has been approved by the Board of Directors and signed by Mr Javier Monteoliva Díaz, General Counsel and Secretary of the Board of Inditex Group.

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