

Crime Prevention Policy

(Criminal Compliance Policy)

**Approved by the Board of Directors
of El Corte Inglés
on 28 February 2018**

Version 5.1 (29 October 2025)

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NOTE: The definitions of the terms most frequently used in this document and in the related regulations that make up the El Corte Inglés Criminal Compliance Management System are set out in **Annex 1**.

1. Introduction

This Crime Prevention Policy (or Criminal Compliance Policy, hereinafter, the 'Policy') reflects the decision of the Board of Directors of El Corte Inglés, S.A. to align with best practices in Corporate Governance in relation to the development of a Criminal Code Compliance Management System (hereinafter also referred to as the 'Criminal Compliance Management System'). In this respect, the Policy applies the concepts used by judges and courts in their rulings to assess reasonable limits for its implementation and takes into consideration the criteria set out in Circular 1/2016 of the State Attorney General's Office on the Criminal Liability of Legal Entities, relevant case law, and the standards established in ISO 19600 on Compliance Management Systems and UNE 19601 on Criminal Compliance Management Systems.

This Policy develops the Code of Ethics of the El Corte Inglés Group, reaffirming its commitment to promoting conduct that is respectful of both applicable regulations and ethical values, and defining its framework of compliance principles in criminal matters.

Furthermore, it is aligned with the Group's culture of integrity and respect for the rules, and takes into account not only the interests and strategic objectives of the Organisation, but also the expectations of its stakeholders. Accordingly, it reflects the Organisation's determination not to tolerate any conduct that may constitute a criminal offence. For this reason, this Policy requires the strongest commitment from the Board of Directors and Senior Management, as well as from all other Members of the Organisation, to comply with its provisions.

Based on this commitment to compliance, this Policy establishes the standards of conduct expected of the persons subject to this document, requires their commitment thereto, describes the measures adopted to supervise compliance with such standards and sets out the consequences in the event of non-compliance.

2. Purpose of the Policy

The purpose of this Policy is to establish general principles to promote, among all Members of the Organisation, a culture of Ethics, Compliance and respect for the Law, thereby preventing any Member of the Organisation from engaging, in the performance of their professional activities, in conduct that may constitute a criminal offence.

Criminal offences include intentional or negligent acts or omissions punishable by law. Accordingly, it is the obligation of each individual to be duly informed of applicable laws, as ignorance of the law does not exempt anyone from compliance.

3. Scope of Application

3.1 Entities and Persons Covered

This Policy is mandatory and applies to all companies included within the Criminal Control Perimeter of El Corte Inglés, S.A., in all their activities and businesses, regardless of the country in which they are carried out.

As legal entities may be held liable not only for acts or omissions occurring in Spain, but also for those taking place in other countries where certain conditions are met, it is essential to remain alert to potentially criminal conduct occurring abroad.

All Members of EL CORTE INGLÉS shall comply with the provisions of this Policy, regardless of their position or the territory from which they operate, without prejudice to compliance with applicable external regulations in each case. This Policy shall also apply to Business Partners when carrying out their activities within EL CORTE INGLÉS, as well as to other stakeholders involved in the value chain. This commitment shall be formalised as set out in Section 8, 'Awareness and Statement of Compliance', of this Policy.

Other companies within the El Corte Inglés Group that are not included within the Criminal Control Perimeter shall develop their own crime prevention policies, aligned with the principles set out in this Policy.

3.2 Activities Covered

This Policy applies to all activities and businesses carried out by EL CORTE INGLÉS.

Given that certain criminal offences may be attributed to legal entities, it is necessary to assess the activities and the context in which the Organisation operates in order to: (i) assess the inherent risk that conduct classified as a criminal offence may occur; (ii) define the associated controls and action plans designed to mitigate such risks; and (iii) determine the underlying residual risk once the controls and action plans have been implemented.

4. General Principles

The principles governing the conduct of Members of the Organisation in the performance of their activities, as set out in this Policy, are as follows:

1. **Respect for the Law:** Ensure that all company activities and operations are carried out in compliance with applicable laws, regulations and standards.
2. **Integrity:** Act with honesty and consistency in all interactions and decisions, maintaining the highest ethical standards.
3. **Transparency:** Ensure clear and open communication, both internally and externally, providing accurate and complete information on the Organisation's operations and practices.
4. **Responsibility:** Assume responsibility for actions undertaken and decisions taken, ensuring compliance with all applicable regulations.
5. **Confidentiality:** Protect confidential and sensitive information, ensuring its appropriate use and preventing unauthorised disclosure.
6. **Prevention:** Adopt proactive measures to identify and mitigate risks, avoiding conduct that may result in regulatory breaches or harm to the Organisation.
7. **Duty to Report Non-Compliance:** Where any breach of this Policy is detected, or where there are doubts as to whether any observed practice may constitute conduct contrary to these rules, all Members of the Organisation are required to immediately contact the Compliance and Risk Control Department of El Corte Inglés through the Ethics Channel, using any of the communication methods indicated in Section 9, 'Reporting Non-Compliance', of this document.
8. **Continuous Improvement:** Establish ongoing evaluation and review processes to ensure the adaptation and continuous improvement of the System.

The El Corte Inglés Group does not permit, authorise or tolerate, under any circumstances, that its Members commit criminal acts or omissions, participate in unlawful actions or operations, or seek to obtain any personal benefit or to favour any interest purported to be in the interests of the Organisation.

In order to promote integrity and responsibility in the performance of their duties, the El Corte Inglés Group has established in its Code of Ethics a commitment to inform, raise awareness and provide training on strict compliance with applicable legal regulations and the Organisation's internal standards, through the internal communication channels made available for this purpose.

5. Third Party Due Diligence

In accordance with the due diligence procedures that EL CORTE INGLÉS must follow in the selection of Third Parties to ensure compliance with criminal law, the Organisation shall monitor the conduct of those who, being subject to the authority of its legal representatives and *de jure* or *de facto* directors, may have engaged in criminal conduct as a result of a serious breach of their duties of supervision, monitoring and control, taking into account the specific circumstances of the case, regardless of whether they are Members of EL CORTE INGLÉS or Business Partners.

Business Partners shall be requested to sign the Statement of Commitment and Adherence, in accordance with the model attached as **Annex 3**. In addition, they shall be required to sign a specific Compliance clause in their contracts, as indicated in **Annex 4**.

6. Catalogue of Criminal Risks

It should be noted that actions carried out in the name or on behalf of El Corte Inglés may give rise, in addition to the criminal liability of the individual concerned, to the criminal liability of El Corte Inglés as a legal entity. The Spanish Criminal Code provides for the criminal liability of legal entities for the commission of certain offences expressly defined in Article 31 bis thereof, as well as for the imposition of ancillary consequences pursuant to Article 129.

These criminal offences refer to crimes committed in the name or on behalf of the legal entity and for its direct or indirect benefit:

- (i) by its legal representatives and *de jure* or *de facto* directors; or
- (ii) by persons subject to their authority, where, in this latter case, the commission of the offence results from a lack of due control, taking into account the specific circumstances of the case.

The purpose of this Catalogue is to provide legal certainty to the Organisation in addressing criminal risks arising in the performance of its activities. To this end, the offences are identified, together with the inherent risk level of each of them based on the Organisation's activities, as well as the associated controls and action plans, which determine the residual risk level for each offence.

It is the obligation of every individual to be duly informed of applicable laws and of the duty to comply with them. It should be borne in mind that any benefit derived from unlawful activity may be either direct or indirect, and particular caution must therefore be exercised in relation to any conduct which, although unlawful, could ultimately benefit the Organisation in such a broad sense. Likewise, legal entities may be held liable not only for acts or omissions occurring in Spain, but also for those taking place in other countries where certain conditions are met, which requires vigilance in relation to potentially criminal conduct carried out abroad under Spanish law.

It is the obligation of each individual to be duly informed of applicable laws and of the duty to comply with them. In this regard, and given that criminal regulations, like all laws, may be subject to update, if any Member of the Organisation has any doubts in this respect or wishes to obtain further information on this matter, they may contact the Compliance and Risk Control Department and/or consult the criminal offences set out in the Spanish Criminal Code in force at any given time (www.boe.es).

7. Organisational Measures

7.1 Criminal Compliance Body

7.1.1 Composition

EL CORTE INGLÉS has a single-person Criminal Compliance Body entrusted with crime prevention functions and responsible for ensuring the effectiveness of this Policy through the implementation of the various measures provided for in the Criminal Compliance Management System that supports it. This single-person body is embodied by the Compliance Officer.

In the performance of their duties, the Compliance Officer shall be supported by an executive body, the Compliance and Risk Control Committee.

In addition, the Compliance Officer may be assisted by the Compliance Representatives of the entities forming part of the Criminal Control Perimeter and shall coordinate, in compliance matters, with the independent Criminal Compliance Bodies of those entities that operate autonomously and are therefore not subject to this Policy.

The communication channels between the Compliance Officer of EL CORTE INGLÉS and the Criminal Compliance Representatives of the entities forming part of the Criminal Control Perimeter, as well as their main responsibilities, are detailed in the Compliance Programme.

The Board of Directors has appointed the Compliance Officer, at the proposal of the Audit and Control Committee, granting them autonomous powers of initiative and control, as well as the highest possible level of independence to carry out their duties, so that they remain free from any business-related constraints that could impair their performance.

Accordingly, the Compliance Officer enjoys the full support of the Board of Directors, to whom they have direct access, and is entrusted with responsibility for supervising the operation and observance of the Criminal Compliance Management System. In this regard, the Compliance Officer is authorised to freely access the information and documentation of the Organisation necessary for the proper and effective performance of their duties, as well as to request the cooperation of the Members of the Organisation required for the fulfilment of their responsibilities. Members of the Organisation are obliged to promptly provide the documents and information requested, always in accordance with the principles of proportionality and appropriateness. The Compliance Officer performs their duties autonomously, without the need for specific mandates, pursuant to the provisions of this Policy and the Compliance Programme.

The independence of the Compliance Officer guarantees neutrality in decision-making. This independence is supported by their functional relationship and direct access to the Board of Directors and, therefore, by their autonomy in the exercise of their functions with respect to the rest of the organisational units responsible for operational management. In addition, the performance evaluation of the Compliance Officer ultimately corresponds to the Board of Directors.

7.1.2 Main Responsibilities

The main responsibilities of the Compliance Officer in the area of crime prevention are grouped as follows:

1. **Promote and supervise the implementation of the Organisation's Criminal Compliance Management System**, ensuring that all persons covered by this document have access to the Organisation's regulations for the prevention of Compliance Risks.
2. **Identify Criminal Compliance obligations**, keep them up to date and disseminate them among the Members of the Organisation.
3. **Identify criminal risks**, analyse and assess them, in order to prioritise actions and allocate resources for their prevention, detection and management.
4. Promote **awareness-raising and training** cycles enabling the persons subject to this document to have the **knowledge and skills** necessary to assume their responsibilities in the prevention, detection and management of Criminal Risks.

5. Advise not only the Board of Directors and Senior Management, but also any other Member of the Organisation who may require the assistance of the Compliance Officer, and **report** to the Board of Directors and Senior Management on the results derived from the implementation of the Criminal Compliance Management System and on its performance.
6. Manage the **Ethics Channel** as a tool for collecting information on potentially unlawful conduct or irregularities.
7. Properly identify, and in an appropriate format, both the information relating to the pillars of the Criminal Compliance Management System and the documentation derived from its implementation, ensuring that it is available (except for information which, due to confidentiality reasons, is accessible only to certain areas of the Organisation), is suitable for use and allows traceability of access and preservation of legibility.
8. **Measure the performance of the EL CORTE INGLÉS Criminal Compliance Management System** through indicators, ensuring that all its elements operate correctly, and promoting its **review and continuous improvement**.

7.2 Obligations of the Members of the Organisation

Since compliance with the law and the proper implementation of the Criminal Compliance Management System concern all Members of the Organisation, all of them, regardless of the position they hold within the Organisation, are expected to: (i) ensure compliance with the provisions of this Policy, observing at all times ethical conduct opposed to the commission of criminal offences; and (ii) promptly follow any instructions issued by the Compliance Officer in the exercise of the functions described above.

7.2.1 Board of Directors and Senior Management

The Board of Directors and Senior Management not only support the Compliance Officer in the performance of their duties, but also actively promote a culture of Compliance within the Organisation, ensuring that the Compliance Officer has adequate resources to effectively implement the Criminal Compliance Management System and encouraging the use of the procedures and channels established for reporting potentially criminal conduct that may affect the Organisation and its activities, among other matters.

The leadership exercised within EL CORTE INGLÉS by its Board of Directors and Senior Management entails, in addition to the obligations applicable to all Members of the Organisation (see Section 7.2.3 of this Policy), the specific obligations set out below.

(i) Obligations of the Board of Directors

The Board of Directors is responsible for formally approving this Policy — as well as any relevant updates it may require — and for promoting the adoption and implementation of a Criminal Compliance Management System appropriate for EL CORTE INGLÉS, suitable for preventing, detecting and managing the Criminal Risks that threaten EL CORTE INGLÉS.

In accordance with the Spanish Criminal Code, EL CORTE INGLÉS has assigned the supervision of the operation and compliance of the implemented prevention model to a body of the legal entity with autonomous powers of initiative and control, namely the Compliance Officer. In addition, it provides the Compliance Officer with adequate and sufficient financial, material and human resources to enable the effective performance of their duties.

As the body responsible for the adoption of the System, it periodically evaluates its effectiveness and promotes its modification, where necessary, when it becomes aware, through any channel, of serious breaches or when significant changes occur in the circumstances affecting EL CORTE INGLÉS, the assessment of its Criminal Risks or the established Criminal Compliance objectives.

Likewise, under the terms provided for in the Criminal Compliance Management System regarding Criminal Compliance reports, the Board of Directors receives, reviews and signs the reports submitted by the Compliance Officer, adopting any actions proposed by the Compliance Officer or promoting those it deems most appropriate for the proper management of identified Criminal Risks.

The Board of Directors also ensures that decision-making processes are established within EL CORTE INGLÉS to reduce the likelihood of the materialisation of the most significant Criminal Risks and, in any case, those assessed above the “low” rating in the Criminal Risk Map. The Board of Directors must review, at the proposal of the Compliance Officer or Senior Management, the procedures and controls associated with the delegation of decision-making authority in areas where Criminal Risk exists, where such delegations apply.

The Board of Directors has delegated the functions of study, analysis and monitoring of these matters to the Audit and Control Committee.

(ii) Obligations of Senior Management

Senior Management of EL CORTE INGLÉS collaborates with the Board of Directors in the performance of its responsibilities, particularly with regard to conveying the Organisation's culture of Compliance and its zero-tolerance stance towards conduct that may lead to the commission of criminal offences.

Due to its proximity to EL CORTE INGLÉS's strategic and operational objectives and its hierarchical position, Senior Management is responsible for:

- Leading and supporting all Members of EL CORTE INGLÉS in the fulfilment of their Compliance obligations.
- Ensuring that all of them integrate such obligations into the performance of their daily activities.
- Ensuring, in the exercise of its executive functions, that the requirements arising from the System are incorporated into all processes and procedures of EL CORTE INGLÉS, guiding and supporting its Members in the observance of the requirements and the effectiveness of the System.
- Ensuring the availability of adequate and sufficient resources for the effective implementation of the System, internally communicating the importance of such implementation in a manner consistent with this Policy.

Senior Management must also identify and act to manage potential or actual conflicts of interest where responsibility or decision-making authority is delegated in areas where Criminal Risk exists.

Senior Management participates in the processes of identification, analysis and assessment of Criminal Risks when required and fosters the use, by the Members of EL CORTE INGLÉS, of the channels made available to them and to Third Parties for reporting potentially criminal conduct that may affect the Organisation and its activities.

With regard to reports made by Members of the Organisation concerning activities related to Criminal Risks, Senior Management ensures the absence of retaliation, discrimination or sanctions for reports made in good faith or for actions aimed at avoiding participation in criminal conduct.

7.2.2 Operational Directors

Directors of Centres and Departments, as the first line of defence, are responsible for complying with the policies and procedures established by EL CORTE INGLÉS and for acting in an ethical and responsible manner.

In this regard, they are responsible for maintaining an effective control environment, ensuring that their areas of responsibility operate in accordance with applicable legislation and internal regulations, and for overseeing the proper implementation of controls, ensuring that the relevant areas apply them correctly.

The involvement and coordination of Operational Directors in relation to the System are defined in the Regulations of the Compliance Function Bodies.

Through procedures for instruction, delegation and supervision, Operational Directors shall ensure that these objectives and responsibilities are shared throughout the organisational structure in its various areas of activity.

7.2.3 All Members of EL CORTE INGLÉS

All Members of EL CORTE INGLÉS are responsible for understanding, observing and applying the provisions of this Policy, cooperating with the Compliance Officer, the Board of Directors, Senior Management and Operational Directors where necessary, and particularly observing the expected conduct in relation to the Catalogue of Criminal Risks.

They are also expected to immediately report to the Compliance Officer any action aimed at preventing or remedying the possible commission of a crime or potential crime of which they become aware.

In addition, all Members of EL CORTE INGLÉS are expected to adhere to High Ethical Standards, attend the criminal compliance training sessions determined in accordance with their role or position, and promptly provide the information and documentation requested by the Compliance Officer.

8. Awareness and Statement of Compliance

Compliance with ethical rules and standards represents both a corporate commitment and a strategic objective for the Organisation. Therefore, all Members of the Organisation are expected to be familiar with and adhere to the contents of this Policy. Likewise, all Business Partners are expected to act in accordance with its principles.

This commitment shall be formalised through:

- i. Statements of compliance with the principles set out herein by Members of the Organisation, confirming their acceptance of **High Ethical Standards**.
- ii. **Compliance clauses included in contracts** with Business Partners

- iii. **Formal agreements or acknowledgement** by the governing bodies of the companies within the El Corte Inglés Group, in accordance with applicable internal regulations.

In the event of significant changes to this Policy (i.e. changes that require formal approval from the Board of Directors of El Corte Inglés, S.A.), the preceding commitments shall be formally renewed.

The Organisation shall respond promptly to any breach of the provisions set out in this Policy, in accordance with its internal regulations and in compliance with all applicable legislation.

9. Reporting of Non-Compliance

Any Member of the Organisation, Business Partner or Third Party with a direct relationship and a legitimate commercial or professional interest who becomes aware of a breach of this Policy, or who has doubts as to whether an observed practice may constitute an unlawful act, whether in the public or private sector, shall immediately contact the Compliance and Risk Control Department of the El Corte Inglés Group via the Ethics Channel, using any of its available means of communication:

- **Digital Channel:**

The El Corte Inglés Group's digital channel can be accessed via the following website:

<https://www.elcorteingles.es/informacioncorporativa/es/gobierno-corporativo/etica-y-cumplimiento/>

This access is available on the corporate website and, additionally, on the NEXO intranet for Members of the Organisation.

- **Postal address:**

El Corte Inglés, S.A.
Compliance and Risk Control
Hermosilla, 112
28009 Madrid

- **Compliance and Risk Control Department – Phone number:** 91 401 85 00

- **Request for a face-to-face or remote meeting**

The information communicated through this Channel is confidential, as is the identity of reporting persons acting in good faith, whose cooperation the Organisation appreciates and in respect of whom it guarantees the absence of retaliation of any kind.

In addition, the Compliance Function may act on its own initiative by investigating any indication of non-compliance with this Policy.

10. Consequences of Non-Compliance

In accordance with the provisions of the El Corte Inglés Group Code of Ethics, as well as the Compliance Programme, all persons subject to this document, regardless of their hierarchical level and geographical and/or functional location, are required to comply with the principles and procedures set out therein, to the extent applicable to them. Likewise, in order to ensure the proper operation of the Criminal Compliance Management System, they are required to report any breach thereof, under the terms set out in Section 9 of this Policy.

Where a breach of EL CORTE INGLÉS' internal ethical and business regulations or of any applicable legislation by any Member of the Organisation is detected, the Compliance and Risk Control Department shall act immediately, investigating the facts and forwarding its conclusions to the Human Resources Department for the adoption of the appropriate measures in each case.

Such measures shall not only apply to the persons whose conduct has caused the risk or damage, but also to any employee who, having been aware of the irregularity, failed to follow the procedures established by EL CORTE INGLÉS for its prevention and response, which is in itself considered a breach of the ethical values and principles to which the El Corte Inglés Group is committed.

The Human Resources Department shall be responsible for applying disciplinary measures in accordance with the system of offences and sanctions provided for in the applicable labour regulations and collective bargaining agreement.

Any measures adopted from a labour perspective shall comply with applicable regulations and shall be proportionate to the seriousness of the facts giving rise to them, and, where appropriate, the legal representatives of the employees shall be informed.

Where the breach has been committed by Business Partners, the commercial relationship may be terminated, within the framework provided for under applicable legislation and the relevant contractual provisions.

The Compliance Officer shall inform the Audit and Control Committee of the outcome of the investigations and of the measures adopted, including disciplinary measures (in the labour sphere) or contractual measures (in commercial relationships with Third Parties), where such measures are considered proportionate to the risks or damage incurred.

Where there are unequivocal indications that the conduct of any Member of the Organisation may constitute a criminal offence, this circumstance shall be reported to the Legal Advisory Department and to the competent authorities for their knowledge and prosecution, together with any evidence and/or indications that may have been gathered in this regard. EL CORTE INGLÉS shall provide its fullest cooperation in any investigations carried out by the authorities.

11. Approval, Effective Date and Updating

This Policy shall enter into force on the date of its approval by the Board of Directors of El Corte Inglés, S.A.

This Policy shall be kept up to date over time. To this end, it shall be reviewed regularly, on an annual basis, and on an extraordinary basis where necessary, and in any event as promptly as possible in the event of changes to the Group's strategic objectives or to internal or external regulatory requirements that require its update or amendment.

The Compliance and Risk Control Department shall be responsible for assessing any proposed amendments, with the support of the Compliance and Risk Control Committee.

In addition, where such changes are significant, they shall be submitted for approval to the Board of Directors, following a proposal from the Audit and Control Committee.

12. Dissemination

Once approved by the Board of Directors of El Corte Inglés, S.A., this Policy shall be made available on NEXO for all Members of the Organisation and on the corporate website for all ECI Group stakeholders.

Likewise, the Compliance and Risk Control Department shall promote the necessary actions to ensure its proper dissemination and awareness.

13. Control, Monitoring and Supervision

13.1 Control and Monitoring

The Compliance and Risk Control Department shall be responsible for controlling and continuously monitoring compliance with the provisions of this Policy, in accordance with the procedure set out in the Charter and the Regulations of the Compliance Function Bodies.

13.2 Supervision

The Internal Audit Function shall review the Criminal Compliance Management System to the extent that the Annual Audit Plan approved by the Audit and Control Committee includes work related to such System, and, on an extraordinary basis, as a result of the occurrence of incidents or the identification of irregularities. Following such audits, the Internal Audit Function shall issue the corresponding report, including recommendations where opportunities for improvement are identified.

Any opportunities for improvement that may be identified as a result of these reviews shall be considered as part of the continuous improvement process of the Criminal Compliance Management System.

VERSION HISTORY

Version 1.0 approved by the Board of Directors on 28/Feb/2018

Version	Date of amendment	Purpose of the amendment	Sections affected
2.0	28/11/2018		
3.0	10/July/2019		
4.0	30/June/2021	<ul style="list-style-type: none"> - Reflect the nature of the new Compliance and Risk Committee - Update definitions 	<ul style="list-style-type: none"> - Approval, Modification and Updating - Annex 1
4.1	30/Nov/2022	<ul style="list-style-type: none"> - Update the system to reflect the recent integration of the Risk Control and Management area into the Compliance Function - Include an express reference to the principles of proportionality and appropriateness governing requests for access to information and documentation required by the Chief Compliance and Risk Officer in the performance of their duties. - Expressly extend the communication channels to include other means: telephone and requests for in-person or remote meetings. - Update definitions 	<ul style="list-style-type: none"> - Organisational Measures - Reporting of Non-Compliance - Annex 1 Definitions
4.2	28/Jun/2023	<ul style="list-style-type: none"> - Update the terms 'complaint', 'complainant' and 'reported person' to 'report', 'reporting person and 'person concerned' in accordance with Law 2/2023 - Adapt the non-compliance reporting process to the new Ethics Channel. - Include an express reference to the responsibility for control and supervision of the Compliance Function and the Internal Audit Function. - Update definitions 	<ul style="list-style-type: none"> - Reporting of Non-Compliance - Control, Monitoring and Supervision - Annex 1 Definitions
5.0	30/Oct/2024	<ul style="list-style-type: none"> - Align Policy with the requirements of the Corporate Sustainability Reporting Directive - Add more principles - Catalogue of Criminal Risks, develop reference to RPPJ 	<ul style="list-style-type: none"> - Principles - Catalogue of Criminal Risks

Version	Date of amendment	Purpose of the amendment	Sections affected
5.1	29/Oct/2025	- Include references to formal agreements and acknowledgements	- Awareness and Statement of Compliance

Last revision, 29 October 2025

Annexes

Annex 1 - Definitions

Below are the definitions of the terms most frequently used in this document and in the related rules that make up the EL CORTE INGLÉS Criminal Compliance Management System.

- **Audit and Control Committee:** A standing body of the Board of Directors with an informative and advisory role, without executive functions. It has full powers to provide information, offer advice and make proposals within its remit, which includes, among other areas, Regulatory Compliance.
- **Board of Directors:** The governing body of El Corte Inglés, S.A., ultimately responsible for the management and results of the activities carried out by the Company, its system of governance and corporate policies, to which Senior Management reports and is accountable.
- **Business Partners:** Any natural or legal person, other than Members of the Organisation, with whom the Organisation maintains or intends to establish a business relationship. By way of example, but not limited to, this includes intermediaries such as agents or commission agents, external advisers, suppliers, customers, joint ventures, or any natural or legal persons contracted by any of the companies within the El Corte Inglés Group for the delivery and/or receipt of goods and/or the provision of services.
- **Catalogue of Criminal Risks:** A document that sets out the list of offences that may give rise to the criminal liability of the legal entity or to the application of ancillary measures, under the terms provided for in Spanish criminal legislation, together with a brief description of each of them.
- **Chief Compliance Officer / Regulatory Compliance and Risk Control Department:** A single-body function, endowed with autonomous powers of initiative and control, entrusted, among other responsibilities, with supervising the proper functioning of the Organisation's Compliance Management System in general, and the Criminal Compliance Management System in particular. The existence of the Criminal Compliance body fulfils the requirement established in Spanish criminal legislation (Article 31 bis of the Spanish Criminal Code) regarding supervision of the Criminal Compliance Management System.
- **Compliance and Risk Control Committee:** A collegial body of an executive nature and oriented towards decision-making, entrusted with advising the Head of the Compliance Function and the Head of the Risk Control and Management Function on all matters it deems relevant in the performance of their respective functions.
- **Compliance Function Charter:** A document that defines the foundations of the Compliance Function of EL CORTE INGLÉS.
- **Compliance Programme:** A document describing the rules and organisational documents in place within EL CORTE INGLÉS in relation to Criminal Compliance, including the measures designed to assess, prevent, detect and manage Criminal Risks at an early stage.
- **Criminal Compliance Management System:** A crime prevention system aimed at preventing, detecting, managing and reporting Criminal Risks, integrated into business processes and subject to ongoing supervision and continuous improvement. It is also referred to as the "System".

- **Criminal Compliance Risks and Controls Matrix:** A document (Excel file) that sets out the Criminal Risks affecting the companies included within the Criminal Control Perimeter of El Corte Inglés, S.A., together with details of the general and specific controls in place to prevent or detect such risks.
- **Criminal Control Perimeter:** It comprises El Corte Inglés, S.A. and the entities that have adhered to the Crime Prevention Policy and to the broader Criminal Compliance Management System of El Corte Inglés, S.A. by decision of their governing bodies, and which do not have their own Head of Regulatory Compliance nor autonomous management in this area.
- **Criminal Risk:** A risk associated with the development of conduct that may constitute a criminal offence attributable to any of the companies of EL CORTE INGLÉS, in accordance with the regime governing the criminal liability of legal entities as established in the Spanish Criminal Code.
- **EL CORTE INGLÉS:** Includes El Corte Inglés, S.A. and the entities that fall within its Criminal Control Perimeter.
- **El Corte Inglés Group / the Group / the Organisation:** The group of companies that make up the El Corte Inglés Group.
- **Members of the Organisation:** Members of the Board of Directors, Senior Management, executives, employees, temporary workers or workers under collaboration agreements, volunteers of the Organisation, and any other persons under the hierarchical authority of any of the above.
- **Operational Directors:** Members of the Organisation who, as the first line of defence, are responsible for ensuring compliance with the policies and procedures established by the Organisation.
- **Persons covered by this document:** All Members of the Organisation, as well as Business Partners or Third Parties that maintain a business relationship with EL CORTE INGLÉS.
- **Persons in Particularly Exposed Positions:** Persons involved in activities that are exposed to a criminal risk assessed as higher than “low” in the criminal risk matrix of EL CORTE INGLÉS.
- **Regulations of the Compliance Function Bodies:** A document governing the functioning of the bodies that make up the Compliance Function of EL CORTE INGLÉS.
- **Reporting Person:** A natural person who uses the Internal Reporting System to report individual or collective conduct occurring within the Organisation that may constitute a breach of the Code of Ethics or of other documents forming part of the Criminal Compliance Management System.
- **Requirement:** A mandatory and predefined obligation. Requirements may derive from criminal legislation and related regulations or be established by EL CORTE INGLÉS through the Crime Prevention Policy or any of the documents supporting and developing the Criminal Compliance Management System.
- **Retaliation:** Any act or omission prohibited by law, or which, directly or indirectly, entails unfavourable treatment placing the affected person at a particular disadvantage in a work-related or professional context solely due to their status as a reporting person or as a result of having made a public disclosure.

- **Senior Management:** Employees of the Organisation who, by decision of the Board of Directors and under its organic or functional dependence, or that of one of its Committees or members, are classified as such by exercising powers inherent in the legal ownership of the Company and relating to its general objectives, with autonomy and full responsibility, limited only by the criteria and direct instructions issued by the governing bodies.
- **Stakeholders / Interest Groups:** Natural or legal persons who, without being Business Partners or Members of the Organisation, may be affected or perceived to be affected by a decision or activity of the Organisation.
- **Third Party:** Any natural or legal person or independent body external to the Organisation.

Annex 2 - Statement of Acceptance of Ethical Compliance Standards for Members of EL CORTE INGLÉS

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High Ethical Standards

The El Corte Inglés Group has established a set of framework policies that outline the general principles to be followed by employees and managers, including in their interaction with different stakeholders.

The achievement of business objectives shall always be consistent with compliance with applicable laws and regulations, while maintaining ethical behaviour in all areas of activity.

Therefore, as an employee, you must demonstrate your commitment to comply with the Code of Ethics and the Corporate Policies that govern the activities of the El Corte Inglés Group by ACCEPTING the following STANDARDS OF COMPLIANCE.

- Ethical Standard

I undertake to understand and comply with the Code of Ethics, the Corporate Policies and the procedures and instructions that implement it within the El Corte Inglés Group. To this end, I will complete the mandatory training provided by the company and will uphold the principles of the Code of Ethics, the Corporate Policies and the internal regulations that implement them in my professional conduct. These include, but are not limited to, policies on crime prevention, prevention of corruption and fraud, relations with authorities, officials and private entities, sustainability and conflicts of interest.

I acknowledge that lack of awareness of the Code and its supporting regulations, as well as failure to complete the required training, does not excuse me from adhering to the ethical principles and standards of conduct set forth in these documents.

- Good Use of Information Systems

I understand that the use of the computer systems and equipment provided to me in my capacity as an employee is for professional use only.

I am responsible for ensuring the safe keeping and proper renewal of the access codes which, together with my user number, give me access to the Systems and that I will not under any circumstances disclose them to any third party.

I understand that the Company's control procedures may include, among other things, storage and verification of messages, transactions or communications by means of access to the content of such messages and their attachments or links, which means they are not subject to my personal confidentiality or privacy, nor that of my interlocutors, whom I must inform accordingly.

I understand that the use of the company's communication channels for purposes other than those for which they are intended, including e-mail, constitutes a breach of the internal regulations. I accept that the work equipment provided to me by the Company is not for personal use.

I acknowledge that El Corte Inglés, S.A. and its group companies may monitor access to the Internet and review messages, transactions, or communications, including their attached files or links, sent or received through the devices/systems accessed under my identification.

I am aware that I shall not install any software or software versions on the Company's equipment or systems that have not been approved by El Corte Inglés, S.A.'s Business and Service Contract Procedure. This includes, but is not limited to, conversational, productivity, and/or coding AI assistants involving business data, unless previously

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authorised.

- **Conflicts of Interest**

I have read and understood the corporate policy governing conflicts of interest, and I agree to disclose any potential conflicts as soon as I become aware of such situations. I also agree to provide any information or clarification necessary to resolve any conflicts that may arise.

- **Prevention of Money Laundering**

I am aware of and will comply with the legal requirements relevant to my role within the Company. Throughout my personal and professional career, I undertake to comply with commercial laws, best business and financial practices and legal restrictions on cash payments that the Company may receive as a result of my services as an employee.

To this end, I hereby declare that I have no unexpired criminal record for offences relating to fraud against property, the socio-economic order, public finances and social security, offences against public administration or forgery. I also certify that I have not been sanctioned by a final administrative decision resulting in suspension or removal from office for violations of Law 10/2010, of 28 April, on the Prevention of Money Laundering and the Financing of Terrorism.

- **Anti-corruption and Anti-bribery**

I am committed to combating fraud, corruption, and illegal activities by performing my duties in accordance with established instructions and procedures, upholding ethical and compliance standards, and promptly reporting any irregularities of which I become aware. I will also fully cooperate, when required, with the Regulatory Compliance, Audit, or Control functions responsible for this task in all matters related to the information contained in the IT resources provided to me by the Company, as well as any information to which I have access through my professional activities, including emails and electronic communications.

I agree not to accept or offer any gifts or favours on behalf of the Company and will inform the Company immediately if any such requests are made in the course of performing my assigned duties.

- **Confidentiality and Duty of Secrecy**

I undertake to maintain the confidentiality of the Company's sensitive information, including personal data and any details or circumstances relating to customers, users or other individuals, to which I have had access in the course of my duties, and to continue to do so after I have ceased to perform the duties in connection with which I have accessed such information, including after my employment with the Company has ended.

I shall return to the Company any computer equipment, physical or electronic media - especially those containing confidential information or personal data - in my possession for any reason that is no longer required to perform my work, in the event of a change in the responsibilities or competencies associated with my role or upon termination of my employment with the Company.

I shall refrain from sharing, through the media, social networks, forums, or any other platform, any opinions, data, criteria, practices, or procedures related to the El Corte Inglés Group, or that could be interpreted as originating from its administrators or managers, unless expressly authorised to do so by a duly authorised person.

- **Personal Data Protection**

I acknowledge the principles governing the Company's Personal Data Protection Policy and agree to undertake and complete the training provided by the Company in this regard.

Crime Prevention Policy

I understand that my personal data will be processed solely for the purpose of carrying out the actions necessary for the management of my work activities and the employment relationship between the company and the employee. I am also informed that images captured by camera or video surveillance systems may be used for the sole purpose of verifying the compliance of employees with their professional obligations and duties in any of the Company's work centres, in accordance with the provisions of the Spanish Organic Law on the Protection of Personal Data and the Guarantee of Digital Rights.

Finally, I acknowledge and accept that (i) strict compliance with all matters set forth in this document constitutes an essential obligation of my employment relationship; and (ii) any conduct that violates the foregoing provisions may be subject to disciplinary action in accordance with the Workers' Statute and the applicable Collective Bargaining Agreement, up to and including termination of my employment contract.

In _____, on the ____ day of _____.

Signed:

Annex 3 - Business Partner Letters of Commitment and Adhesion (side letters)

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Letter of Commitment to Compliance with the Ethical Principles Governing the Relationship Between the Companies of the El Corte Inglés Group and Their Suppliers and Collaborators

Since its establishment, El Corte Inglés has upheld the principle that ethical business conduct is a critical element in balancing the rights of all stakeholders and society as a whole. This approach is a fundamental requirement for achieving its business objectives.

As a result, the Board of Directors has decided to align itself with best practice in corporate governance, not only complying with all applicable regulations, but also meeting the requirements and recommendations of regulators.

In line with this commitment, the Group adopted a comprehensive Code of Ethics in September 2017, which outlines the ethical principles and standards of conduct to which the El Corte Inglés Group, its employees and directors are bound in the performance of their professional activities.

Furthermore, the El Corte Inglés Group expects its suppliers and collaborators to strictly comply with the regulations applicable to their agreements and contracts and to maintain high ethical standards in their professional relationships.

Consequently, the El Corte Inglés Group requires its suppliers, collaborators, and their subcontractors to acknowledge and adhere to this Letter of Commitment to Compliance by signing it and committing to uphold the following Principles in their relationship with the Group:

FIRST. *Mutual Commitment to Product or Service Quality, Guarantees, and Safety:* Ensuring compliance with all applicable standards, regulations, and quality standards, and meeting consumer expectations.

SECOND. *The Quest for Excellence:* Fostering mutual collaboration to improve the quality and development of products and services, with the common goal of delivering excellence to our consumers.

THIRD. *Adherence to Agreed Terms within the Business Relationship:* A commitment to honour contractual obligations, including delivery and payment terms, as agreed.

FOURTH. *Stability in Business Relationships:* We aim to build long-term, stable relationships with suppliers for mutual benefit and consumer satisfaction.

FIFTH. *Loyalty and Trust:* Building relationships based on loyalty and trust, with a commitment to share all information relevant to the achievement of these principles.

SIXTH. *Respect for Human Rights and Social, Labour, and Environmental Standards:* The El Corte Inglés Group adheres to the United Nations Global Compact and the Amfori BSCI Code of Conduct, which is based on the fundamental conventions of the International Labour Organisation (ILO).

The Group is committed to adhering to these principles and requires that all companies involved in the value chain of manufacturing, processing, handling or transporting goods or providing services do the same. These principles are:

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- Compliance with applicable laws and regulations.
- Freedom of association and the right to collective bargaining.
- Prohibition of all forms of discrimination.
- Decent working hours and a fair remuneration in accordance with local legislation.
- Occupational health, safety, and risk prevention.
- Prohibition of child labour.
- Appropriate protection for young workers.
- Prohibition of forced or coerced labour, degrading treatment, and the elimination of precarious employment.
- Comprehensive environmental protection and the efficient use of resources, in line with sustainable development.
- Ethical business conduct.

In addition, the due diligence that the El Corte Inglés Group must carry out in relation to products and/or services that bear trademarks owned by the El Corte Inglés Group, or those that are licensed, imported or exclusive to the Group, requires it to verify, either directly or through third parties, the extent to which its suppliers comply with these principles. Consequently, these suppliers and collaborators are required to disclose the locations of their production or service centres. Under no circumstances will undeclared or previously unauthorised subcontracting be permitted.

SEVENTH. Commitment to Responsible and Sustainable Production and Consumption with Customers. Promoting responsible consumption habits and expanding the range of sustainable products taking into account the product life cycle, recyclability, and the promotion of the circular economy.

To this end, suppliers are expected to comply with, obtain and maintain, either directly or through a third party, the relevant certifications required to demonstrate the sustainability attributes recognised by the El Corte Inglés Group and outlined in the Sustainable Product Guide available on the El Corte Inglés Supplier Portal.

EIGHTH. Commitment to Data Protection Compliance: Should the processing of personal data be necessary within the framework of the relationship established, the company undertakes to implement the technical and organisational measures required to ensure a level of security appropriate to the risks involved, in accordance with EU Regulation 2016/679, Spanish LOPDGDD 3/2018 and other applicable regulations.

As part of this commitment, if personal data is stored in a country outside the European Economic Area, it will be ensured that the country has been recognised by the European Commission as having an adequate level of data protection. Alternatively, it will be guaranteed that the data processing complies with one of the following safeguards: binding corporate rules approved by an equivalent supervisory authority, or standard data protection clauses adopted by the European Commission.

NINTH. Secure Management of Information. The information relating to our customers, employees and collaborators, as well as the information necessary for the development of our activities, is a valuable asset for the El Corte Inglés Group. It must be managed with appropriate security measures in order to maintain the value of these assets, ensure the delivery of services and maintain the trust that our customers place in us.

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TENTH. The undersigned expressly declare that *they will not engage in any practice of corruption, bribery or unethical business conduct* in the course of their business activities, nor will they make financial contributions, gifts, gratuities or favours to employees of other companies, public officials or members of political parties or associations with the aim of influencing their decisions in order to obtain ethically unacceptable advantages.

The undersigned further warrants that their directors, employees, agents or representatives, shareholders or partners, and subcontractors will also refrain from engaging in the conduct described in the preceding paragraph.

Finally, the undersigned undertakes to cooperate fully with the El Corte Inglés Group in order to establish whether there has been a breach of the provisions of this Policy.

ELEVENTH. *Regulatory Compliance, Integrity and Adherence to the Code of Ethics*: Any company involved in the preparation, transformation, handling of products or provision of services within the El Corte Inglés Group must comply with all the regulations applicable to its specific activities. In addition, these companies must respect and comply with the provisions of the El Corte Inglés Group Code of Ethics, from which our Corporate Policies are derived. These documents are available on the following website:

[Code of Ethics - El Corte Inglés \(elcorteingles.es\)](http://elcorteingles.es)

This link also provides access to our Ethics Channel, which facilitates direct and confidential communication to report potential conflicts with these Principles and Guidelines and, in particular, with the Company's (i) Crime Prevention, (ii) Anti-Corruption and Fraud, (iii) Corporate Social Responsibility, (iv) Data Protection and (v) Information Security policies.

Acceptance of our purchase order or service request implies express agreement with the content of these Principles and Policies.

COMMITMENT TO COMPLIANCE

In accordance with the above, the company [____], domiciled at [____], represented for these purposes by [____], acting in their capacity as [____-],

FORMALLY DECLARES

That it accepts and shares the Ethical Principles that govern the relationship between the El Corte Inglés Group and its suppliers and collaborators. The company acknowledges the Code of Ethics and Corporate Policies and undertakes to comply with and implement them within the scope of its responsibilities.

Signed in Signed in [____], on this day of [____], 2[____].

(Signature and stamp)

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Letter of Commitment to Compliance Mutual Acceptance of Ethical Principles

El Corte Inglés, S.A. hereby acknowledges its awareness of the Code of Conduct of [_____] , which is available on the following website: [_____]

In turn, [Company Name] acknowledges its awareness of the principles that govern the relationship between the El Corte Inglés Group and its suppliers, creditors, and collaborators, as well as the provisions outlined in the El Corte Inglés Code of Ethics and the related policies, which are available on its website:
<https://www.elcorteingles.es/informacióncorporativa/es/gobierno-corporativo/etica-y-cumplimiento/>

Both parties agree to accept the respective Codes to the extent that their principles are fundamentally aligned. In the event of any discrepancy, the provisions of the El Corte Inglés Code of Ethics shall take precedence in matters pertaining to El Corte Inglés, while the provisions of the Code of Conduct of [_____] shall apply in matters concerning [_____].

Both parties hereby confirm that they have established procedures for reporting any irregularities or breaches of these principles. In addition, both parties undertake to inform each other promptly and reciprocally of any communications relating to this contract received through their respective reporting channels.

Furthermore, both parties expressly agree not to engage in any acts of corruption, bribery, or unethical business practices. They further agree not to offer financial contributions, gifts, handouts, gratuities, or benefits to employees of other companies, public officials, or members of political parties or associations, with the intent to influence their decisions in order to obtain ethically unacceptable advantages.

To this end, both parties shall ensure that their directors, employees, agents, representatives, administrators, shareholders, partners and subcontracted third parties involved in their business relationship refrain from the aforementioned actions and undertake to exercise due diligence in their management and supervision duties.

Name and Surname, Signature, and Title of [XX]

Name and Surname, Signature, and Title of El Corte Inglés S.A.

Place and date

Place and date

Annex 4 - Compliance Contractual Clause

INTEGRITY, BUSINESS CONDUCT AND COMPLIANCE

OPTION A

El Corte Inglés S.A. expects all its suppliers and collaborators to strictly comply with the regulations applicable to the actions and obligations set out in agreements and contracts, and to uphold high ethical standards in their professional relationships.

In this regard, both parties declare that they, as well as their employees or subcontractors with whom they work, shall:

- i. Comply with and undertake to enforce compliance with the regulations applicable to the subject of this contract, including, in particular, those concerning:
 - The prevention and prosecution of any form of corruption and fraud
 - The prevention of money laundering and the financing of terrorism
 - The protection of personal data
 - The defence of free competition
 - Advertising regulations
 - The protection and/or defence of intellectual or industrial property
 - The protection and/or defence of the environment
 - Workers' rights, including freedom of association, collective bargaining, and the fight against any form of workplace discrimination
 - The defence of human rights
- ii. Not permit, either directly or indirectly, forced or child labour
- iii. Acknowledge and agree to the principles and provisions set out in the El Corte Inglés Code of Ethics (available at <https://www.elcorteingles.es/informacióncorporativa/es/gobierno-corporativo/etica-y-cumplimiento/normas-eticas>) and in the policies that develop it (available at: <https://www.elcorteingles.es/informacióncorporativa/es/gobierno-corporativo/etica-y-cumplimiento/politicas-corporativas>), as well as the procedures for reporting any irregularities or non-compliance, particularly through the Ethics Channel of EL CORTE INGLÉS (available at: <https://www.elcorteingles.es/informacióncorporativa/es/gobierno-corporativo/etica-y-cumplimiento/contacto-canal-etico/>).

Furthermore, both parties expressly agree not to engage in any acts of corruption, bribery, or unethical business practices. They also agree not to offer financial contributions, gifts, handouts, gratuities, or benefits to employees of other companies, public officials, or members of political parties or associations with the intent of influencing their decisions to gain ethically unacceptable advantages.

Both parties shall endeavour to ensure that their directors, employees, agents or representatives, shareholders or partners, and any third parties subcontracted in connection with this contract refrain from engaging in the actions described in the preceding paragraph.

Finally, each party undertakes to cooperate fully with the other party to determine whether a breach of this clause has occurred within the scope of this contract. In the event of a breach, the non-breaching party shall have the right to terminate this contract immediately, without any obligation to pay the breaching party any financial compensation in relation to the termination, and without prejudice to the payment of damages, including reputational damages, caused by such a breach.

OPTION B**INTEGRITY, BUSINESS CONDUCT AND COMPLIANCE**

El Corte Inglés S.A. expects all its suppliers and collaborators to strictly comply with the regulations applicable to the actions and obligations set out in agreements and contracts, and to uphold high ethical standards in their professional relationships.

In this regard, both parties declare that they, as well as their employees or subcontractors with whom they work, shall:

- i. Comply with and undertake to enforce compliance with the regulations applicable to the subject of this contract, including, in particular, those concerning:
 - The prevention and prosecution of any form of corruption and fraud
 - The prevention of money laundering and the financing of terrorism
 - The protection of personal data
 - The defence of free competition
 - Advertising regulations
 - The protection and/or defence of intellectual or industrial property
 - The protection and/or defence of the environment
 - Workers' rights, particularly, the fight against any form of workplace discrimination, and
 - The defence of human rights
- ii. Not permit, either directly or indirectly, forced or child labour

All these principles are included in the Code of Ethics of El Corte Inglés (available at <https://www.elcorteingles.es/informacióncorporativa/es/gobierno-corporativo/etica-y-cumplimiento/normas-eticas>) and in the policies that implement it (available at: <https://www.elcorteingles.es/informacióncorporativa/es/gobierno-corporativo/etica-y-cumplimiento/politicas-corporativas>), as well as in the Code of Ethics of (name of the other party, if applicable).

El Corte Inglés has an Ethics Channel (available at: <https://www.elcorteingles.es/informacióncorporativa/es/gobierno-corporativo/etica-y-cumplimiento/contacto-canal-etico/>) designed to report, in a confidential and transparent manner, any irregularity, unlawful act, or breach of these principles.

Furthermore, both parties expressly agree not to engage in any acts of corruption, bribery, or unethical business practices. They also agree not to offer financial contributions, gifts, handouts, gratuities, or benefits to employees of other companies, public officials, or members of political parties or associations with the intent of influencing their decisions to gain ethically unacceptable advantages.

Both parties shall endeavour to ensure that their directors, employees, agents or representatives, shareholders or partners, and any third parties subcontracted in connection with this contract refrain from engaging in the actions described in the preceding paragraph.

Finally, each party undertakes to cooperate fully with the other party to determine whether a breach of this clause has occurred within the scope of this contract. In the event of a breach, the non-breaching party shall have the right to terminate this contract immediately, without any obligation to pay the breaching party any financial compensation in relation to the termination, and without prejudice to the payment of damages, including reputational damages, caused by such a breach.