

# Corporate Customer Service Policy

Approved by the Board of Directors  
of El Corte Inglés, S.A.  
on 27 April 2022

Version 2.0 (30 October 2024)

## Table of contents

<b>1.</b>	<b>Introduction.....</b>	<b>1</b>
<b>2.</b>	<b>Purpose .....</b>	<b>2</b>
<b>3.</b>	<b>Scope of Application.....</b>	<b>2</b>
<b>4.</b>	<b>Basic Principles of Customer Service .....</b>	<b>2</b>
4.1	Respect for the Law .....	3
4.2	Maximum Satisfaction .....	3
4.3	Safety and Trust.....	3
4.4	Innovation and Continuous Improvement .....	4
4.5	Availability .....	4
4.6	Accessibility.....	4
4.7	Speed, Accuracy and Efficiency .....	4
4.8	Clarity and Transparency .....	4
4.9	Confidentiality and Privacy.....	5
4.10	Omnichannel Experience .....	5
4.11	Sustainability .....	5
<b>5.</b>	<b>Duty of Cooperation .....</b>	<b>5</b>
<b>6.</b>	<b>Awareness and Statement of Compliance .....</b>	<b>6</b>
<b>7.</b>	<b>Reporting of Non-compliance .....</b>	<b>6</b>
<b>8.</b>	<b>Approval, Effective Date and Updating .....</b>	<b>7</b>
<b>9.</b>	<b>Dissemination .....</b>	<b>8</b>
<b>10.</b>	<b>Control, Follow-up and Supervision .....</b>	<b>8</b>
10.1	Control and Follow-up.....	8
10.2	Supervision .....	8
	<b>Annex 1 - Definitions.....</b>	<b>11</b>

**NOTE:** The definitions of the most frequently used terms in this document and in the regulations that make up the EL CORTE INGLÉS Compliance Management System are provided in **Annex 1**.

## 1. Introduction

From our inception, our commitment to personalised attention and exceptional service has distinguished us as a leading company.

The customer is at the heart of our business and we strive to maintain a relationship based on mutual trust and respect. Customer care and service is one of our core ethical principles. As stated in our Code of Ethics, *“one of the fundamental pillars of El Corte Inglés Group's commercial policy is to ensure maximum customer satisfaction and to deliver the highest levels of service, expertise, quality and assurance through products and services that optimise our customers' purchasing decisions based on their needs and interests”*.

Consequently, every employee and manager at El Corte Inglés Group (hereinafter referred to as the ‘ECI Group’ or the ‘Group’) is expected to operate with responsibility, commitment, and utmost respect for the customer. Their primary goal should be to excel in the service they deliver, ensuring the highest quality and safety in all products and services offered.

In light of the above, our business model is based on the provision of an attractive, diverse and high-quality commercial proposition that includes innovative products and services designed to address both current and future customer needs. We operate in an omnichannel environment that facilitates constant interaction between the physical and digital worlds, allowing our customers to seamlessly access all our products and services through both channels, while maintaining the highest standards of security, privacy and confidentiality of their personal data.

The El Corte Inglés Group has adopted this Policy in order to reaffirm its commitment to achieving maximum customer satisfaction and offering its customers the highest levels of service, specialisation, quality and guarantee.

This Corporate Customer Service Policy (hereinafter referred to as the ‘Policy’) is aligned with the Group's values and reaffirms the Group's commitment to contributing to the 17 Sustainable Development Goals of the United Nations, in particular Goal 12 - Responsible Production and Consumption, and to respecting all applicable regulations, as well as the ethical standards and other regulations and initiatives to which the Group subscribes, such as:

- UN Global Compact
- OECD Guidelines for Multinational Enterprises
- ‘Confianza Online’ Code of Conduct

To achieve this, the Organisation has established a framework of behavioural principles, applicable to all areas of activity.

This Policy expands on the Code of Ethics of the El Corte Inglés Group, and reaffirms the Group's commitment to ensuring maximum customer satisfaction and delivering the highest levels of service, expertise, quality and assurance, and is consistent with the rest of the Group's Corporate Policies, in particular the following:

- Corporate Policy on Anti-Money Laundering and Combating the Financing of Terrorism
- Corporate Data Protection Policy

## 2. Purpose

The purpose of this Policy is to establish the general criteria and principles that should guide customer relations and customer service within the El Corte Inglés Group.

## 3. Scope of Application

This Policy is mandatory and applies to all Group companies in all activities related to the downstream value chain, regardless of the country in which they are carried out.

All Members of the Organisation, irrespective of their position or the territory from which they operate, are required to comply with this Policy, as are Business Partners in the conduct of their activities within the Group.

This commitment shall be formalised as set out in Section 7 'Awareness and Statement of Compliance' of this Policy.

## 4. Basic Principles of Customer Service

As mentioned above, our Code of Ethics states that one of the fundamental pillars of El Corte Inglés Group's commercial policy is to ensure maximum customer satisfaction and to deliver the highest levels of service, expertise, quality and assurance through products and services that optimise our customers' purchasing decisions based on their needs and interests.

To uphold this ethical principle, the El Corte Inglés Group expects all Members of the Organisation and Business Partners to adhere to the following principles in their interactions with the Group's customers:

1. Respect for the Law
2. Maximum Satisfaction
3. Safety and Trust

4. Innovation and Continuous Improvement
5. Availability
6. Accessibility
7. Speed, Accuracy and Efficiency
8. Clarity and Transparency
9. Confidentiality and Privacy
10. Omnichannel Experience
11. Sustainability

#### **4.1 Respect for the Law**

Ethical behaviour requires consistent compliance with the laws and regulations in force, as well as with the internal rules and codes of conduct and good practices voluntarily adopted by the El Corte Inglés Group, including those related to customer service.

It is therefore imperative that we comply with all relevant local, regional, national and/or EU regulations when interacting with our customers. Additionally, compliance with the best practices adopted by the Group constitutes a reference framework for the entire Organisation.

The El Corte Inglés Group expects all Members of the Organisation and its Business Partners to serve as role models, promoting a corporate culture that upholds these values and measures performance accordingly.

#### **4.2 Maximum Satisfaction**

All Members of the Organisation and Business Partners shall act in an ethical, responsible and committed manner at all times. Their primary objective shall be to excel in the service they deliver, ensuring the highest quality and safety in all products and services offered.

In this context, we are committed to selecting products and services that meet the highest quality standards and to ensuring full traceability of manufacturing and distribution processes.

We strive to build long-term relationships with our customers by maintaining strict quality standards for all our products and services and conducting regular customer satisfaction surveys.

#### **4.3 Safety and Trust**

The El Corte Inglés Group is committed to ensuring that its products, services and marketing activities meet the highest standards of safety and is constantly striving to earn and maintain the trust of its customers.

We therefore prioritise the health, well-being and protection of our customers in all our products and services, as well as in the physical and digital environments in which we operate, going beyond mere legal compliance.

#### **4.4 Innovation and Continuous Improvement**

We are committed to innovation and continuous improvement of our processes, products and services in order to meet our customers' current and future needs, address their concerns and exceed their expectations.

To achieve this goal, all Group employees and managers shall contribute positively to the innovation and continuous improvement processes that are implemented in their respective areas and companies.

#### **4.5 Availability**

The El Corte Inglés Group provides several accessible and transparent communication channels to facilitate ongoing dialogue with stakeholders and to identify and respond to their needs and expectations.

To achieve this, we aim to be accessible and responsive to our customers' needs and requests, ensuring that our employees and managers understand their responsibility to be accessible, respectful and equitable, with special attention to vulnerable consumers.

#### **4.6 Accessibility**

We aim for all products and services provided to our customers to be easily accessible and understandable. We ensure that the information provided is transparent, clear and straightforward, enabling them to make informed choices about their consumption and use.

To this end, we are actively working to remove architectural and communication barriers in our stores and retail centres. Our aim is to improve accessibility for customers of all abilities by incorporating appropriate measures in both physical and digital spaces.

#### **4.7 Speed, Accuracy and Efficiency**

We are committed to providing our customers with fast, agile, specific and well-founded solutions. To this end, we have established procedures and dedicated customer service teams equipped with the necessary training and technical resources to support our customers throughout the sales process.

#### **4.8 Clarity and Transparency**

All employees and managers of the El Corte Inglés Group shall ensure that communication with customers is clear and transparent at all times.

The Group is committed to maintaining a fair and honest competitive environment. We have a zero-tolerance policy for any misleading, fraudulent or malicious communication or behaviour.

Therefore, all employees and managers of the El Corte Inglés Group must refrain from engaging in any form of abusive or unfair commercial practice and avoid any conduct that could attract the interest of potential customers through inappropriate, unfair, or unlawful methods.

#### **4.9 Confidentiality and Privacy**

All employees and managers of the El Corte Inglés Group shall comply with internal regulations and applicable legislation. They shall maintain the strictest confidentiality regarding any personal, financial, commercial, technological or other sensitive information in their possession or to which they have access. Additionally, they shall protect customer data, particularly personal data, and use it only for the purposes expressly authorised by the customer, applying the security measures established by the Company during processing.

#### **4.10 Omnichannel Experience**

We offer our customers a wide range of products and services through a seamless integration of offline and online experiences. By ensuring that the physical and digital realms complement and continuously interact with each other, we enable our customers to explore different products and services across both channels, all while maintaining the same level of transparency, security, and assurance throughout their journey.

#### **4.11 Sustainability**

Our commitment to our customers is underpinned by a strong focus on sustainability, which is one of the strategic pillars of our Organisation. As part of a circular economy approach, we promote responsible production and consumption throughout the entire life cycle of products and services, from design to final recycling. Our aim is to promote long-term social, environmental and economic development while reducing negative external impacts.

### **5. Duty of Cooperation**

All of the Group's areas and companies shall work together with the primary, common and ultimate objective of providing a fast, unique and consistent response to the Group's customers.

In fulfilling this duty, the Group's areas and companies shall:

- ✓ Respect the legitimate exercise of responsibilities by other areas or companies
- ✓ Provide clear and timely information in the exercise of their own responsibilities
- ✓ Provide any assistance requested by other areas and companies for the effective exercise of their responsibilities
- ✓ Prioritise the interests of the Group over those of individual areas or companies in order to provide the most efficient and effective response to our customers.

Only through cooperation between the different departments and companies can we ensure the effectiveness of our processes and the timely resolution of queries and complaints, ultimately achieving customer satisfaction.

## 6. 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 in this Policy by Members of the Organisation, confirming their acceptance of **High Ethical Standards**.
- ii. The inclusion of **compliance clauses in contracts** with Business Partners
- iii. **Formal agreements or acknowledgement** by the governing bodies of the companies within the Corte Inglés Group in accordance with applicable internal regulations.

Such agreements and their renewals shall be notified to the El Corte Inglés Group's Chief Compliance and Risk Officer.

In the event of significant changes to this Policy, – i.e. changes that require formal approval from the Board of Directors at 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.

## 7. Reporting of Non-compliance

In order to ensure the effective implementation of this policy, the Organisation has established different reporting and internal communication channels.

All commercial claims from customers shall be handled directly by our Customer Services team in accordance with the standards and principles set out in this Corporate Policy.

In addition, Chief Compliance and Risk Officer shall be informed of any potential breach of this Policy or applicable law to ensure the matter is addressed promptly and effectively. Accordingly, any Member of the Organisation, Business Partner or Third Party with a direct relationship and legitimate commercial or professional interest, or any other interested party, who becomes aware of a violation of this Policy or who is in doubt as to whether an observed practice may constitute a breach, whether in the public or private sector, shall immediately contact the Chief Compliance and Risk Officer of the El Corte Inglés Group. This should be done via the Ethics Channel, using any of the available options:

- **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/>

Access to this resource is available on the company's website and on the NEXO intranet for the Members of the Organisation.

- **Mailing address:**

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

- **Telephone number of the Compliance Officer:** 91 401 85 00

- **Requesting a face-to-face or virtual meeting**

The information submitted through the Ethics Channel is confidential, as is the identity of the whistleblower. The Organisation values their contribution and guarantees that there will be no retaliation against them.

The Chief Compliance and Risk Officer may also independently investigate any evidence of non-compliance with this Policy.

## **8. Approval, Effective Date and Updating**

This Policy shall become effective on the date of its approval by the Board of Directors of El Corte Inglés S.A.

This Policy shall be updated on a regular basis. To this end, it shall be reviewed annually as a standard practice and, additionally, whenever necessary. In particular, the Policy shall be

promptly reviewed if there are any changes to the Organisation's strategic objectives or any internal, external, or regulatory changes that require an update or modification.

The Chief Compliance and Risk Officer, with the assistance of the Compliance and Risk Control Committee, shall review any suggested amendments.

If the amendments are substantial, they shall be submitted to the Board of Directors for approval following a recommendation from the Audit and Control Committee.

## **9. Dissemination**

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

The Chief Compliance and Risk Officer shall ensure that the Policy is effectively communicated and understood throughout the Organisation.

## **10. Control, Follow-up and Supervision**

### **10.1 Control and Follow-up**

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

### **10.2 Supervision**

The Internal Audit Function shall review the Group's compliance management system to the extent that the annual audit plan approved by the Audit and Control Committee includes tasks related to this system. An extraordinary review may also be conducted in response to any incidents or irregularities that are identified. Upon completion of the audits, the Internal Audit Function shall issue a report containing recommendations for any identified areas for improvement.

Any potential areas for improvement identified as a result of these reviews shall be incorporated into the ongoing improvement process of the Criminal Compliance Management System.

## VERSION HISTORY

**Version 1.0 approved by the Board of Directors on 27/Apr/2024**

Version	Date of amendment	Purpose of the amendment	Sections affected
1.1	30/Nov/2022	<ul style="list-style-type: none"> <li>- Update the system to reflect the recent integration of the Risk Control and Management area into the Compliance Function</li> <li>- Make explicit reference to other means of communication, such as telephone and the option of requesting a face-to-face or virtual meeting.</li> <li>- Update definitions</li> </ul>	<ul style="list-style-type: none"> <li>- Investigation and Reporting of Non-compliance</li> <li>- Annex 1 Definitions</li> </ul>
1.2	28/Jun/2023	<ul style="list-style-type: none"> <li>- Update communication channels to report non-compliance in accordance with Law 2/2023.</li> <li>- Update the terms 'complaint', 'reporting person' and 'reported person' to 'report', 'whistleblower' and 'person concerned' in accordance with Law 2/2023</li> <li>- Add Safety and Trust to services</li> <li>- Update definitions</li> </ul>	<ul style="list-style-type: none"> <li>- Basic Principles of Customer Service</li> <li>- Reporting of Non-compliance</li> <li>- Annex 1 Definitions</li> </ul>
2.0	30/Oct/2024	<ul style="list-style-type: none"> <li>- Align Policy with the requirements of the Corporate Sustainability Reporting Directive.</li> <li>- Include a reference to the new internal rules governing the Group companies' compliance with the Corporate Policies.</li> <li>- Update digital channels for reporting non-compliance.</li> <li>- Include 'Dissemination' section</li> </ul>	<ul style="list-style-type: none"> <li>- Introduction</li> <li>- Awareness and Statement of Compliance</li> <li>- Reporting of Non-compliance</li> <li>- Dissemination</li> </ul>

Last revision, October 2024

## Annexes

## Annex 1 - Definitions

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

- **Audit and Control Committee:** A standing body of the Board of Directors with an informative and advisory role and, but without executive functions. It has full powers to provide information, offer advice, and make proposals within its remit, which includes Regulatory Compliance and other areas.
- **Board of Directors:** The governing body of El Corte Inglés, S.A., which has ultimate responsibility for the management and results of the Company's activities, its governance structure and its policies. Senior Management reports to and is accountable to the Board.
- **Chief Compliance Officer / Regulatory Compliance and Risk Control Department:** A single-person body with independent powers of initiative and control and entrusted with a number of duties, including the supervision of the effectiveness of the Organisation's Compliance Management System, and particularly the Criminal Compliance Management System. The creation of the Criminal Compliance Body fulfils the requirement set out in the Spanish legislation (article 31 bis of the Spanish Criminal Code) regarding the supervision of the Criminal Compliance Management System.
- **Communication:** Notification of a possible breach of the rules applicable to the El Corte Inglés Group.
- **Compliance and Risk Control Committee:** A collegial, executive and decision-making body that advises the Chief Compliance Officer and the Chief Risk Officer on all relevant matters in relation to the performance of their respective duties.
- **Criminal Control Perimeter:** It comprises El Corte Inglés S.A. and all entities that have adopted the Crime Prevention Policy and the broader Criminal Compliance Management System of El Corte Inglés, S.A. as determined by the decision of their respective governing bodies, but which do not have a dedicated Chief Compliance Officer or an autonomous management structure in this area.
- **El Corte Inglés Group / the Group / the Organisation:** Group of companies that make up the El Corte Inglés Group.
- **EL CORTE INGLÉS:** It includes El Corte Inglés, S.A. and the entities that fall within its Criminal Control Perimeter.
- **Ethics Channel:** A secure platform that provides confidential and direct communication for Members of the Organisation and Third Parties to report queries or issues related to non-compliance.

- **Members of the Organisation:** This includes Members of the Board of Directors, Senior Management, executives, employees, temporary workers, or employees under collaboration agreements, and volunteers. It also includes anyone who reports to any of these groups.
- **Persons covered by this document:** All Members of the Organisation, as well as Business Partners or Third Parties who have a business relationship with EL CORTE INGLÉS.
- **Retaliation:** Any direct or indirect act or omission that is prohibited by law or which may cause a detriment or disadvantage in a work-related context because of the individual's status as a whistleblower or because they have made a public disclosure.
- **Senior Management:** These are employees of the Organisation who are appointed by the Board of Directors. They report to the Board, its committees or one of its members, and they exercise the powers inherent in the legal ownership of the Company and its general objectives. They operate with autonomy and full accountability, subject only to the criteria and direct instructions of the Company's governing bodies.
- **Stakeholders/ Interest Groups:** Natural or legal persons other than Business Partners or Members of the Organisation, who may be affected or perceived to be affected by a decision or activity of the Organisation.
- **Third Party:** A natural or legal person or body that is independent of the Organisation.
- **Vulnerable consumer:** Natural persons who, individually or collectively, by reason of their characteristics, needs or personal, economic, educational or social circumstances, are in a special situation of subordination, defencelessness or lack of protection, whether territorially, sectorally or temporarily, which prevents them from exercising their rights as consumers under equal conditions, and who therefore require greater protection in order to ensure that decisions are taken in accordance with their interests in specific consumer relations.
- **Whistleblower:** A natural person who uses the Internal Reporting System to report an individual or collective behaviour that occurs within the Organisation and may involve a violation of the Code of Ethics or other documents related to the Criminal Compliance Management System.