



# Corporate Diversity, Equity and Inclusion Policy

Approved by the Board of Directors of  
El Corte Inglés, S.A. on 29 October 2020

**Version 2.0 – 29th January 2025**

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## 1. Introduction

The companies within the El Corte Inglés Group (hereinafter referred to as the 'Group' or the 'Organisation') have been committed, since their inception, to fostering an ethical corporate culture that respects and values differences, promoting the inclusion of individuals with diverse beliefs and values, gender, culture, identity and sexual orientation, age, abilities and capabilities, or any other characteristic that brings unique value to our team.

Diversity is a core value of the Organisation; therefore, this Corporate Diversity, Equity and Inclusion Policy (hereinafter referred to as the 'Policy') expands on the Code of Ethics, continues the Corporate Policy on Equality and Diversity, and aligns with the rest of the Corporate Policies, particularly the Corporate Human Resources Policy and the Corporate Sustainability Policy.

We are committed to respecting and protecting human and labour rights as recognised by national and international legislation, implementing good business practices based on the principles of the Universal Declaration of Human Rights, the International Labour Organization (ILO) Conventions and Declarations, the United Nations Global Compact, the 2030 Agenda, and the Sustainable Development Goals.

Diversity is a key competitive advantage, enabling us to align our activities with an evolving and diverse society, facilitating access to new markets and upholding human rights.

## 2. Purpose of the Policy

The Board of Directors has approved this Diversity, Equity and Inclusion Policy, recognising as a strategic objective the development of employment and commercial relationships based on equal opportunities, non-discrimination, and respect for diversity.

The purpose of this Policy is to set out the fundamental principles for effectively managing both internal and external diversity, ensuring equal opportunities and inclusion for all individuals who work with or interact with the Group, regardless of their unique characteristics. It also aims to foster a culture of respect and eliminate behaviours that contradict our values and corporate identity.

## 3. Scope of Application

This Policy is mandatory and applies to all Group companies, which commit to integrating these principles into their corporate culture and in all activities related to their value chain, regardless of the country in which they are carried out.

In investee companies where this Policy is not applicable, the Organisation shall promote the alignment of its policies with those of the Group.

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 the 'Awareness and Statement of Compliance' section of this Policy.

## 4. Definitions

Below are the definitions of the most frequently used terms in this document.

- Diversity: The set of visible and non-visible characteristics that make individuals unique and distinctive.

- **Equity:** Understanding the social and individual realities and circumstances of each person, providing them with what they need to achieve equality in exercising their rights.
- **Equality:** Ensuring that all individuals have the same rights, resources, and opportunities, irrespective of any particular condition.
- **Inclusion:** A strategy that values the individual characteristics of all people within the Organisation, creating opportunities for all to participate, fostering a diverse environment and a sense of belonging.
- **Discrimination:** Any distinction, preference, restriction, or exclusion based on race, gender, age, religion, politics, or physical or mental condition that seeks to nullify or impair equality of opportunity.

## 5. Types of Diversity

The Group recognises that diversity manifests in multiple forms and dimensions. Below are the main types of diversity that we value and promote within our workplace:

- a) **Cultural Diversity:** Diversity related to nationality, region, ethnicity, religion, or political affiliation.
- b) **Gender Diversity:** Equal opportunities for men and women, ensuring the absence of direct or indirect discrimination based on sex.
- c) **Gender Identity and Sexual Orientation Diversity:** Gender identity is not a choice but a condition; it reflects how each individual experiences their gender, and respecting it means allowing freedom of expression. Sexual orientation refers to a person's ability to feel emotional, affective, and sexual attraction to another person.
- d) **Ability Diversity:** The set of qualities, aptitudes, or conditions unique to each individual, influencing their way of engaging with society.
- e) **Generational Diversity:** The Group embraces multiple generations, each with different skills, motivations, concerns, values, attitudes, work and life circumstances, and communication and interaction styles.

## 6. Principles

The Corporate Diversity, Equity and Inclusion Policy is based on the following principles:

### 1) Non-discrimination

The Group implements appropriate and effective measures to prevent discrimination or preference based on gender, age, religion, race, birth, social origin, disability, ethnicity, nationality, trade union membership, political opinion or affiliation, identity and sexual orientation, family responsibilities, maternity or paternity, marital status, illness, or any other condition that may lead to discrimination.

### 2) Diverse Workforce

The Group encourages the recruitment of individuals from diverse backgrounds and perspectives, recognising the added value of diverse teams in decision-making and creative processes. Similarly, the interaction of varied professional and life experiences fosters innovation and talent engagement.

### 3) Diverse Customers

The Group continuously acknowledges and integrates societal complexities in developing business lines and commercial strategies, and establishing communication guidelines, ensuring an appropriate assortment of products and services that meet the needs of all customers, who reflect the diversity of society.

#### 4) Diverse Society

The Group establishes strong connections with the societies in the countries and regions where it operates. To gain a deeper understanding of society's concerns and expectations, the Group engages in dialogue with its stakeholders and conducts analyses and studies. Based on these insights, it develops projects and supports causes that strengthen its ties with society in various ways.

#### 5) Supplier Diversity

The Group promotes diversity through the procurement of goods and services and by integrating Diversity and Inclusion criteria into the ESG qualification questionnaire, thereby fostering effective integration and the social economy. Additionally, it encourages local procurement in its offices and international operations in accordance with the provisions of this Policy.

## 7. Commitments

To ensure proper management of diversity, equity, and inclusion, the Group commits to non-discrimination based on race, age, gender, sex, marital status, ideology, political opinions, nationality, religion, identity and sexual orientation, or any other personal, physical, or social condition among its employees, clients, suppliers, and society through the following commitments:

1. **Equality:** Ensuring effective equality of opportunities in recruitment, employment access, training, promotion, remuneration, and professional development.
2. **Inclusive Leadership:** Promoting a leadership model that fosters corporate culture based on diversity, equity, and inclusion principles, highlighting the contribution of diversity to the Group's purpose and challenges from an innovative perspective.
3. **Employment Quality:** Improving employment quality by fostering stable, high-value jobs that support the continuous development of skills and competencies for everyone working within the Group.
4. **Inclusion:** Encouraging the inclusion of individuals with diverse abilities and profiles within the Group and in its relationships with business partners.
5. **Work-Life Balance:** Supporting work-life balance and promoting shared responsibility and well-being.
6. **Inclusive Language:** Encouraging the use of inclusive written and visual language, non-sexist and non-discriminatory communication, and combating stereotypes to prevent any form of discrimination or harassment.
7. **Integration and Non-Discrimination:** Promoting inclusion and non-discrimination by offering products and services accessible to all, regardless of their choices or needs, while also fostering health and realistically representing body diversity through inclusive marketing and advertising.
8. **Collaboration:** Facilitating intergenerational collaboration, enabling everyone to contribute, innovate, and enrich the work environment through their diverse perspectives.
9. **Combating Gender-based Violence:** Supporting the fight against gender-based violence through specific programmes and collaboration agreements that include protection, support, information, and employment integration measures for victims.
10. **Respectful Work Environment:** Maintaining a respectful workplace for all people. According to the first principle of this Policy, the Organisation upholds human rights, particularly non-discrimination, ensuring neutrality on political, philosophical, or religious opinions. To uphold this neutrality and respect for all individuals, Members of the

Organisation shall refrain from displaying prominent religious or ideological symbols in the workplace.

11. **Accessibility:** Promoting universal accessibility by eliminating physical, technological, cognitive, and sensory barriers to foster inclusive and discrimination-free environments.
12. **Use of Artificial Intelligence:** Ensuring the responsible and unbiased use of AI in talent attraction, selection, people management, training, promotion, and communication, avoiding potential discrimination and maintaining transparency and traceability.

## 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 in this Procedure 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.

## 9. Reporting of Non-compliance

The 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, 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.

- **Postal 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.

## 10. 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.

## 11. Management and Monitoring

The Corporate People and Talent Management Department is primarily responsible for implementing, managing, monitoring, and disseminating all principles and commitments outlined in this Policy. To this end, internal processes are reviewed, diversity, equity, and inclusion objectives are defined, and progress is reported.

Additionally, the Diversity Committee is established as a multi-company consultative body that fosters awareness and proposes potential improvements. It shall also be responsible for advising and making recommendations to the Management on sensitive diversity, equity, and inclusion matters, including the withdrawal of products, services, or internal and external marketing and communication campaigns that may contradict the principles outlined in this Policy. The Diversity Committee shall meet at least every six months and shall prepare an annual report.

## 12. 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.

Additionally, it shall be communicated to all Group employees through internal communication channels or by distributing the document prepared by the Corporate People and Talent

Management Department, once approved by the Board of Directors of El Corte Inglés, S.A. New employees shall have access to this document as part of their onboarding information.

## VERSION HISTORY

**Reviewed by the Diversity Committee, 4 June 2018**

**Reviewed by the CSR Committee, 27 October 2020.**

**Version 1.0 approved by the Board of Directors on 29/Oct/2020**

Version	Date of amendment	Purpose of the amendment	Sections affected
2.0	29/Jan/2025	<ul style="list-style-type: none"> <li>- Rename the Policy to better reflect its content.</li> <li>- Include Diversity and Inclusion criteria in the ESG qualification questionnaire.</li> <li>- Update and expand commitments</li> <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> </ul>	<ul style="list-style-type: none"> <li>- Introduction</li> <li>- Principles</li> <li>- Commitments</li> <li>- Awareness and Statement of Compliance</li> <li>- Reporting of Non-compliance</li> </ul>

Last revision, January 2025