

# Corporate Donations and Sponsorship Policy

**Approved by the Board of Directors  
of El Corte Inglés, S.A.  
on 25 September 2019**

Version 3.1 (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

The El Corte Inglés Group (hereinafter referred to as the 'Organisation' or the 'Group') recognises donations and sponsorships as valuable tools for generating a positive impact on society and for strengthening its relationship with society by fostering initiatives that promote social welfare, education, culture and sustainable development.

With the aim of ensuring that the Group's decisions on donations and sponsorships are responsible and based on clear and objective criteria, this Corporate Donations and Sponsorship Policy (hereinafter, the 'Policy') has been drawn up at the initiative of the Board of Directors of El Corte Inglés, S.A.

This Policy develops the content of the Corporate Anti-Corruption and Anti-Fraud Policy and is aligned with the culture of integrity and the ethical values set out in the El Corte Inglés Group Code of Ethics and in the other policies referred to as the 'Integrity Policies'<sup>1</sup>. It also reflects respect for legal requirements and ethical standards, taking into account not only the interests of the Organisation, but also the needs and expectations of its Members, as well as those of its Business Partners, Third Parties and other Stakeholders.

Likewise, the Organisation unequivocally condemns any corrupt practice which, in addition to contravening applicable legal provisions, is contrary to its ethical principles and values, as reflected in the aforementioned documents, which are key to achieving its objectives towards society.

In this regard, this Policy establishes a basic anti-bribery compliance framework in accordance with the provisions of the international standard UNE-ISO 37001 on anti-bribery management systems. This framework shall guide the Group's actions in relation to contributions to social, cultural and community causes, as well as the support of events and activities that reflect its values and commitment to social responsibility.

By adopting this Policy, the Organisation reaffirms its commitment to acting as a positive agent of change in society, contributing to the development of stronger and more resilient communities, and ensuring that its actions reflect its core values of integrity and responsibility, thereby confirming its firm intention to contribute to the 17 United Nations Sustainable Development Goals.

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<sup>1</sup>The Integrity Policies are: the Corporate Gifts and Hospitality Policy, the Corporate Donations and Sponsorship Policy, and the Corporate Policy on Relations with Public Authorities and Officials and Private Entities

## 2. Purpose of the Policy

Through this Policy, the Organisation seeks to establish a clear and transparent framework, as well as basic criteria, for the management of donations, sponsorships and social action, ensuring that all contributions are aligned with the values and strategic objectives of the Organisation. This is intended to ensure that all Members of the Organisation, as well as Business Partners, comply with the main anti-bribery regulations applicable in the markets in which the Group operates.

## 3. Scope of Application

This Policy is mandatory and applies globally to all companies within the Group.

All Members of the Organisation shall comply with its provisions, regardless of their position or the territory from which they operate. It shall also apply to Business Partners when carrying out 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. Principles of Action

The El Corte Inglés Group expects all Members of the Organisation and other stakeholders to observe the following principles:

- **Respect for the Law:** All activities related to donations and sponsorships shall comply with the laws and regulations applicable in each jurisdiction in which the Group operates.
- **Ethical and Legal Financial Practices:** All payments shall comply with applicable tax laws and regulations.
- **Transparency:** All donations and sponsorships shall be managed with full transparency, providing clear information on the origin of the funds, their use and the impact generated.
- **Integrity and Absence of Conflicts of Interest:** Decisions regarding donations and sponsorships shall be taken on the basis of ethical criteria, avoiding any conflict of interest that may compromise the integrity of the Organisation.

- **Prohibition of Donations to Political Parties:** The El Corte Inglés Group prohibits all Members of the Organisation from making donations to political parties on behalf of, or for the benefit of, the Organisation, whether directly or indirectly, including through foundations linked to such parties.
- **Social Responsibility:** Donation and sponsorship initiatives shall be aligned with the mission and values of the Organisation, seeking to generate a positive impact on the community and contribute to social welfare.
- **Equity:** All requests for donations or sponsorships shall be assessed fairly and impartially, without favouritism or discrimination.
- **Sustainability:** Priority shall be given to projects and organisations that promote environmental, social and economic sustainability, ensuring that contributions have a lasting impact.
- **Collaboration:** Strategic partnerships shall be encouraged with organisations that share the Group's values, promoting a collaborative approach to maximise the impact of donations and sponsorships.

## 5. Approval of Donations and Sponsorship

For the approval of donations, the Organisation has a Donations area within the Communications, Institutional Relations (IR) and Sustainability Department, which acts in accordance with the provisions of this Policy and applies the procedure set out in the relevant internal regulations.

For the negotiation and approval of sponsorships, the El Corte Inglés Group has, within the same Department, a Sponsorships and Events area, which likewise acts in accordance with this Policy and the procedure established for this purpose.

## 6. Due Diligence

Due diligence refers to the process of investigation and evaluation carried out by the Organisation to ensure compliance with ethical standards and applicable regulations, as well as to ensure that all donations and sponsorships are conducted in a responsible and ethical manner, thereby preventing risks such as corruption and fraud.

At the El Corte Inglés Group, the due diligence process is at all times aligned with the Organisation's values, principles of good practice and internal regulations, as well as with applicable legislation.

In this regard, the Organisation shall:

- ✓ Conduct an initial assessment: Before considering any donation or sponsorship request, the relevant area shall carry out an initial assessment in order to:
  - Determine alignment with the Group's values and strategic objectives.
  - Verify the identity and legitimacy of the applicant, ensuring that it is a legally constituted and recognised entity and not a political party.
  - Check the origin of the need, as well as the suitability of the recipient entity. In the case of sponsorships, the assessment of their suitability and terms shall also take into account the nature of the promoting entity and the organised event.

To this end, the following checks shall, in all cases, be carried out:

1. The corporate name and beneficial ownership of the entity.
  2. The identity of the members of its governing body.
  3. The corporate purpose and activity carried out by the entity, which must be consistent with the Organisation's policies.
  4. The absence of any indications or criminal records, or links to organisations with such records, in relation to the entity and/or the members of its governing body.
  5. The absence of links with persons holding public responsibility (as defined in the regulations on the prevention of money laundering), in relation to the entity and/or the members of its governing body.
- ✓ Identify and assess the potential legal, reputational and ethical risks associated with the proposed donation or sponsorship.
  - ✓ Document the process: Interested parties shall be required to provide the information necessary to enable a comprehensive assessment. In addition, activities qualifying as donations or sponsorships shall be documented in writing, and the corresponding amounts shall be paid or transferred directly to the recipient entity or event, without the involvement of third-party intermediaries.

All of the above shall be recorded in the relevant tool used for the control and management of sponsorships by the Communications, IR and Sustainability Department (Sponsorships and Events area) and, in the case of donations, by the Financial Services Department.

- ✓ Make payments using accepted methods: No Member of the Organisation may make direct donations in cash or by any other cash-equivalent means without complying with the procedure set out in this Policy and the applicable internal regulations.

Donations may be made through El Corte Inglés gift cards, provided that a written record of both the applicant and the recipient is maintained, this Policy and the applicable internal regulations are complied with, and the donation is processed by the competent area referred to above.

- ✓ Implement review and follow-up systems: Once the relevant donations or sponsorships have been made, it shall be verified that they have been used for the agreed purpose and that they are not intended to obtain any undue advantage for the Organisation.

## 7. 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, through their adherence to the **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.

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

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.

## 8. Reporting of Non-Compliance

The Compliance and Risk Control Department must be made aware of any potential breach of this Policy or of the applicable legislation in this area in order to address the matter promptly and effectively. Accordingly, any Member of the Organisation, Business Partner or Third Party with a direct relationship and a legitimate commercial or professional interest, or any other interested party, who detects 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 be obliged to immediately contact the Compliance and Risk Control Department of the El Corte Inglés Group. This shall be done 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 and Risk Control Department may act on its own initiative by investigating any indication of non-compliance with this Policy.

## 9. Investigation of Non-compliance

Where appropriate, and on the basis of the evidence gathered, the Compliance and Risk Control Department shall investigate any reports relating to the formalisation of donations and sponsorships that are contrary to this Policy and that involve the Organisation or are in any way connected with it. All such investigations shall be duly documented.

As a result of these investigations, the Organisation shall determine the actions to be taken, which may include disciplinary measures against Members of the Organisation or, where appropriate, the termination of business relationships with Business Partners and/or Third Parties.

The Compliance and Risk Control Department shall report directly to the Audit and Control Committee on the results of these investigations, as well as on the implementation and continuous improvement of 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 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.

## **11. 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.

## **12. Review and Follow-up of the Policy**

The Compliance and Risk Control Department shall be responsible for ensuring that the implementation and compliance with this Policy are reviewed on a regular basis. Appropriate dissemination and awareness-raising measures shall also be adopted in relation to this policy.

Monitoring of this Policy includes: (i) procedures for reporting irregular activities; (ii) periodic reviews of the effectiveness of employee training in relation to these matters; (iii) reports and records of incidents related to this Policy; and (iv) review of the adequacy of the El Corte Inglés Group Integrity Policies with applicable legislation.

In any case, the Organisation shall properly monitor, evaluate and record its customary practices with respect to donations and sponsorships.

## **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 Group's 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, in the event 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 25/Sep/2019

Version	Date of amendment	Purpose of the amendment	Sections affected
2	30/June/2021	<ul style="list-style-type: none"> <li>- Reflect the nature of the new Compliance and Risk Committee</li> <li>- Update definitions</li> </ul>	<ul style="list-style-type: none"> <li>- Scope of Application</li> <li>- Approval, Modification and Updating</li> <li>- Annex 1</li> </ul>
2.1	30/Nov/2022	<ul style="list-style-type: none"> <li>- Adapt the system to the recent integration of the Risk Control and Management area under the Regulatory Compliance Department.</li> <li>- Expressly extend the communication channels to include other means: telephone and requests for in-person or remote meetings.</li> <li>- Update definitions</li> </ul>	<ul style="list-style-type: none"> <li>- Reporting of Non-Compliance</li> <li>- Annex 1 Definitions</li> </ul>
2.2	28/Jun/2023	<ul style="list-style-type: none"> <li>- Update the scope of application</li> <li>- Update the terms 'complaint', 'complainant' and 'reported person' to 'report', 'reporting person' and 'person concerned' in accordance with Law 2/2023</li> <li>- Adapt the non-compliance reporting process to the new Ethics Channel.</li> <li>- Include an express reference to the responsibility for control and supervision of the Compliance Function and the Internal Audit Function.</li> <li>- Update definitions</li> </ul>	<ul style="list-style-type: none"> <li>- Reporting of Non-Compliance</li> <li>- Control, Monitoring and Supervision</li> <li>- Annex 1 Definitions</li> </ul>

<b>Version</b>	<b>Date of amendment</b>	<b>Purpose of the amendment</b>	<b>Sections affected</b>
3.0	30/Oct/2024	<ul style="list-style-type: none"> <li>- Align Policy with the requirements of the Corporate Sustainability Reporting Directive.</li> <li>- List the Principles of Action</li> <li>- Include Due diligence process.</li> <li>- Include 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>- Principles of Action</li> <li>- Due Diligence</li> <li>- Awareness and Statement of Compliance</li> <li>- Reporting of Non-Compliance</li> <li>- Dissemination</li> </ul>
3.1	28/Oct/2025	<ul style="list-style-type: none"> <li>- Include reference to the tool used for the registration of donations and sponsorships.</li> </ul>	<ul style="list-style-type: none"> <li>- Section 6 Due Diligence</li> </ul>

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, of an informative and advisory nature, without executive functions, with full powers of information, advice and proposal within its scope of action, which includes, among other areas, Regulatory Compliance.
- **Board of Directors:** The governing body of El Corte Inglés, S.A., with ultimate responsibility for the management and results of the activities carried out by the Company, its governance system and corporate policies, to which Senior Management reports and is accountable.
- **Business Partners:** Any legal or natural 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.
- **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.
- **Criminal Control Perimeter:** It includes El Corte Inglés, S.A. and the entities that have adhered to the Corporate Crime Prevention Policy and to the remainder of the Criminal Compliance Management System of El Corte Inglés, S.A. by decision of their governing bodies, and which do not have their own Chief Compliance Officer nor an autonomous management structure in this area.
- **Donation:** Any transfer of value made free of charge in favour of another person, who accepts it.
- **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.
- **Ethics Channel:** Platform that ensures direct, confidential and secure communication of queries or non-compliance issues by the Members of the Organisation and by Third Parties.
- **Internal Reporting System:** The preferred channel for reporting potential irregularities. This System comprises the reporting channel itself, understood as the means for receiving information, as well as the System Manager, the Policy and the procedure for managing communications.
- **Internal Reporting System Manager:** Within the El Corte Inglés Group, responsibility for the Internal Reporting System lies with the Chief Compliance Officer.
- **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.
- **Reporting Person:** A natural person who reports, through the Internal Reporting System, 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.
- **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.
- **Sponsorship:** The act of supporting or financing an activity, normally for advertising purposes or as consideration for a benefit.
- **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.