

# Corporate Financial Policy

Approved by the Board of Directors  
of El Corte Inglés  
on 24 February 2021

Version 1.4 (29 October 2025)

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## 1. Introduction

Since its establishment, El Corte Inglés, S.A. (hereinafter referred to as the 'Company') has upheld the principle that ethical business conduct is a critical element in balancing the rights of all stakeholders and society as a whole. The Company regards ethical conduct as a fundamental requirement for achieving its business objectives.

Ethical behaviour requires strict compliance with applicable laws and regulations, as well as with internal rules, codes of conduct, and best practices voluntarily adopted by the El Corte Inglés Group (hereinafter referred to as the 'Group'), including those related to economic and financial matters.

In this context, compliance with applicable economic and financial regulations is one of our core principles, in order to meet internal objectives and external requirements, as well as to provide the necessary information to the financial markets and other stakeholders.

The Board of Directors is responsible for approving the Organisation's economic and financial strategy and corporate policies, including this Corporate Financial Policy (hereinafter referred to as the 'Policy').

In carrying out these responsibilities, the Board of Directors has approved this Corporate Financial Policy, which forms part of the Group's corporate governance and regulatory compliance framework. This Policy defines the economic and financial strategies and procedures that guide the operations of the Group's Areas, Units, Departments, and Entities.

The Corporate Finance Department develops and periodically updates the procedures that contribute to the control of risks within the Economic and Financial Area. In this way, the Group's control model is aligned with best practices in corporate governance and the applicable reference frameworks.

## 2. Purpose

The purpose of this Policy is to define the principles and guidelines necessary to ensure the coordination of the economic and financial management of the various Areas and Subsidiaries of the ECI Group, with a view to contributing to the achievement of strategies and objectives in areas such as:

- i. Defining an optimal financial structure.
- ii. Planning, monitoring and reporting on economic and financial management.
- iii. Accessing the financial resources necessary to carry out the Group's activities and businesses.

- iv. Using financial resources available in the most efficient manner.
- v. Ensuring adequate control or mitigation of financial risks, such as interest rate risk, foreign exchange risk, liquidity risk and credit risk.
- vi. Ensuring the integrity of records and the proper documentation supporting economic transactions.
- vii. Preparing individual and consolidated financial statements, ensuring that they present a true and fair view of the Group's assets, results and financial position, in accordance with applicable regulations.
- viii. Ensuring transparency in the communication of economic and financial information to the markets and to the general public.
- ix. Ensuring compliance with applicable regulations and with internal policies and procedures.
- x. Ensuring the consistency of key indicators for management control and, therefore, for business monitoring.

The values, principles and good practices underpinning this Financial Policy shall serve as a reference for decision-making at all organisational levels and across all entities within the Group, and shall guide the conduct of employees, senior managers and directors in their internal and external relations (with shareholders, customers, suppliers, public authorities, private entities and other stakeholders).

### **3. Scope of Application and Relevant Bodies**

This Policy is mandatory and applies globally to all entities that make up the ECI Group. All Members of the Organisation shall comply with its provisions, regardless of the position they hold or the Area, Unit, Entity and/or geographical location in which they operate.

Adherence to this Policy by the entities forming part of the ECI Group shall be formalised through a decision of their General Management and/or their respective governing bodies, depending on the characteristics of each entity and as set out in Section 7, 'Awareness and Statement of Compliance', of this Policy.

The Corporate Finance Department is responsible for establishing the criteria and procedures that the different Divisions, Areas and Companies of the Group must comply with in the economic and financial management process. Such criteria and procedures provide that the actions and operations carried out in this area by the Divisions, Areas and Companies of the ECI Group must be reported and recorded and must receive the express approval of the Corporate Finance Department.

The application of this Policy and of the procedures implementing it shall include, at least, the two types of activities set out below:

1. Activities for which the Corporate Finance Department assumes full responsibility:
  - a. Financial reporting to the Group's governing bodies and to the market.
  - b. Treasury.
  - c. Accounting.
2. Activities in which the Corporate Finance Department plays a relevant role in the coordination and prior approval of certain specific matters within the Group's economic and financial area:
  - a. Management control.
  - b. Monitoring of the strategic plan.
  - c. Group taxation (in particular, all matters relating to related-party transactions and transfer pricing).
  - d. Organisational aspects relating to structural matters such as, for example, human resources, and the implementation of and changes to Systems and applications.

The Annex sets out the list of procedures developed by the Corporate Finance Department as at the date of preparation of this Policy.

In general terms, the responsibilities of the Corporate Finance Department include, among others, the following:

- establishing the applicable criteria and principles,
- harmonising global corporate criteria,
- developing the procedures and regulations necessary for their implementation; and
- continuously monitoring the effective application of the procedures.

Decisions shall always be adopted taking into consideration the pursuit of maximum efficiency and the achievement of favourable synergies for the Group.

Furthermore, as indicated above, the Corporate Finance Department is responsible for reporting economic and financial information to the Group's governing bodies, as well as to the financial markets where the type of information, the nature of the transactions and/or the characteristics of the applicable regulations so require.

As with all other Areas of the Organisation, its activities shall be subject to the supervision of the Audit and Control Committee through the Internal Audit function.

## 4. General Principles

The general principles governing the Group's economic and financial management, and consequently the economic and financial decision-making process, are as follows:

1. Adopting, implementing and promoting best corporate governance practices.
2. Ensuring compliance with all applicable laws and regulations in all jurisdictions where the Group operates, as well as with internal and voluntarily adopted economic and financial regulations.
3. Maintaining due diligence to prevent, identify and eliminate any non-compliance with the law or irregular conduct.
4. Preventing and mitigating significant financial risks, particularly those related to interest rates, exchange rates, liquidity, and credit.
5. Fostering relationships with public administrations and regulatory bodies based on respect for the law, loyalty, mutual trust, cooperation and good faith, while respecting the principles outlined, even when disagreements on the interpretation of applicable rules may arise.
6. Ensuring that financial information, accounting records, contracts and supporting documentation accurately reflect the nature of the transactions carried out by the Group, so that the annual financial statements (consolidated and/or individual) provide a true and fair view of the Group's assets, results and financial position.
7. Avoiding duplications and inefficiencies in economic and financial management.
8. Ensuring compliance with the principles of objectivity, professionalism, efficiency in management, transparency and communication among all its members.
9. Developing procedures through the Corporate Finance Department for their awareness and application by the Areas, Units and Entities responsible for their execution, as well as determining the technical and/or organisational measures to be implemented.

## 5. Specific Operating Principles

In the conduct of its economic and financial management, the ECI Group shall be guided by the following specific principles of action:

### 5.1 Good Corporate Governance

- The Board of Directors shall approve this Corporate Financial Policy and oversee its monitoring.

- The Audit and Control Committee shall inform the Board of Directors of the content, implications and economic and financial consequences associated with the criteria and transactions that are relevant for decision-making and subject to mandatory reporting requirements.
- Economic and financial decisions shall be adopted at the appropriate organisational level, including, for these purposes, the involvement of the Board of Directors when the nature of the transactions, their high amount or associated risks, so require, in accordance with applicable external and internal regulations. This Policy requires the collaboration of the various departments and professionals involved, in order to ensure that all relevant economic and financial implications are assessed in each decision.
- The Audit and Control Committee, as the body responsible for supervising the effectiveness of the internal control and risk management systems, shall oversee the application of this Policy, assisted by the Internal Audit Function and, where appropriate, in coordination with the Audit Committees that may exist within subsidiaries of the ECI Group.
- The Corporate Finance Department shall be the executive body responsible for the effective implementation of this Policy. To this end, it shall be provided with adequate material and human resources, duly qualified for that purpose.
- Appropriate mechanisms shall be established for the prevention, reduction, mitigation and control of economic and financial risks, in accordance with the principles, risk tolerance and risk appetite defined in the ECI Group's Risk Control and Management System.

## **5.2 Regulatory Compliance**

- Compliance with all applicable legal and regulatory provisions shall be ensured, as well as with internal rules and any other economic and financial regulations arising from codes of conduct or good practices to which the ECI Group has voluntarily decided to adhere. The objective is to align economic and financial actions with best practices in this area, updating the Policy and Procedures in line with the continuous evolution of regulations and best practices.
- Decision-making shall be based on the best interpretation of the applicable rules.

- The required economic and financial information shall be submitted in a timely manner and in due form, in accordance with legal obligations and the requirements of financial markets or other stakeholders.

### **5.3 Economic and Financial Management**

- Adopting, implementing and promoting best practices in economic and financial management.
- The business plan, annual budgets and specific objectives applicable at any given time shall serve as the primary instruments for the development and establishment of the economic and financial planning of the necessary economic and financial resources.
- Managing the Group's activities with an appropriate assessment of economic, financial and tax risks, and establishing appropriate mechanisms to cover, anticipate and reduce such risks.
- Subjecting economic and financial operations to an internal control system that ensures the integrity and transparency of information and is periodically reviewed through internal and external audits.
- Establishing minimum profitability requirements for the various businesses, activities and companies of the ECI Group to ensure sustainable financial growth.
- Defining an appropriate liability structure to ensure an optimal balance between equity and debt and an adequate allocation of resources among the Group's Companies and Units, adjusting costs and minimising risks.
- Ensuring the consistency and reasonableness of the financial commitments negotiated in the contracts entered into by the ECI Group and guaranteeing their subsequent fulfilment.
- Preparing economic, financial and tax information for internal management and for compliance with external requirements, with the aim of supporting decision-making, providing the necessary information to the financial markets and other stakeholders with the greatest transparency and in compliance with legal and tax requirements. In this context, the Internal Control System over Financial Reporting (SCIIF) is of particular importance, as part of the internal control framework. It comprises the set of processes carried out by the Board of Directors, the Audit and Control Committee, Senior Management and the Group's relevant personnel to provide reasonable assurance regarding the reliability of regulated financial information.

- Directing the monitoring activities of economic and financial management towards increasing efficiency in the performance of the activities of the ECI Group's Companies and ensuring the reliability of economic and financial information.
- Acting responsibly in financial markets, including securities and debt markets, in accordance with the regulatory framework established by such markets and their regulators and supervisory bodies.
- Maintaining optimal relations with shareholders, analysts and potential investors based on correct, transparent and reliable information and communication.
- Regularly reviewing the level of compliance with the objectives set for each organisational unit or company within the ECI Group.
- Regularly reviewing compliance with the tax policies of the ECI Group's Companies based on the principles of transparency, good governance and responsibility.

#### **5.4 Information, Training and Staff Awareness**

- The Corporate Finance Department shall inform all those involved in economic and financial management of the obligation to authorise, record and report the various transactions, in accordance with the time limits and frequencies established in the regulations issued by that Department.
- Training of the members of the ECI Group in compliance matters, including economic and financial compliance, is essential for the Organisation. Accordingly, general training and information actions shall be established in order to foster a culture of compliance and integrity among professionals, aligned with the principles set out in this Policy and in the Code of Ethics.
- All measures necessary shall be implemented to eliminate any type of irregular and/or fraudulent activities. Such measures shall include the disclosure of the existence of whistleblowing channels for reporting any non-compliance or irregularities.

## **6. Third-party Due Diligence**

Due diligence in the field of financial management is an essential process for the Organisation, aimed at ensuring that the Group's financial decisions and practices are carried out in a responsible and ethical manner and in compliance with the applicable regulations.

The Organisation has implemented appropriate due diligence in financial management through practices and procedures designed to ensure the integrity and sustainability of its financial operations, helping to prevent fraud and errors and contributing to the confidence of investors, customers and other stakeholders in the financial information presented by the Organisation.

To this end, the Organisation shall:

- Ensure that all financial transactions comply with applicable laws and regulations.
- Develop, implement and maintain internal policies governing financial management.
- Identify and assess financial risks.
- Periodically review the financial statements to ensure that they accurately reflect the Organisation's financial position.
- Conduct regular audits to verify the accuracy of financial information and compliance with accounting and tax regulations.
- Provide clear and accessible financial reporting to all stakeholders to build trust and accountability.
- Ensure that decisions are based on accurate and timely information.

## 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, 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. 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

In order to ensure the effective application of this Policy, the Organisation has established various mechanisms for reporting and communicating incidents and queries of any nature.

Furthermore, 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 who detects a breach of this Policy, or who has doubts as to whether an observed practice may constitute an act contrary to its provisions, 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, Madrid 28009

- **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. 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 on a regular basis, on an annual basis, and on an extraordinary basis and, in any event, as promptly as possible, where changes occur in the Group's strategic objectives or where any internal or external regulatory changes arise that require its update or amendment.

Proposals for amendments shall be submitted to the Audit and Control Committee by the Corporate Finance Department, following validation by the Compliance and Risk Control Department and under the corresponding supervision of the internal control body entrusted with such function.

Where the Audit and Control Committee considers such proposals appropriate, it shall submit them to the Board of Directors for, where applicable, final approval.

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.

## 10. 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.

## 11. Implementation, Review, Control and Supervision

### 11.1 Implementation

The Corporate Finance Department shall develop and update procedures and distribute them to the Areas, Units and Entities that shall be required to apply them. Such procedures shall detail the Group's criteria, identify those responsible for preparing the information, and specify the frequency with which the information must be prepared and provided to the Corporate Finance Department. Likewise, the procedures shall detail the authorisation flows required for certain economic and financial transactions.

The Corporate Finance Department shall establish the control systems and internal rules necessary to ensure compliance with applicable legislation, the applicable principles and the corresponding procedures across all Areas and Subsidiaries of the ECI Group.

### 11.2 Review

The Chief Financial Officer shall assess, at least once a year, compliance with and the effectiveness of this Policy, as well as the performance of the professionals responsible for its implementation, and shall report thereon to the Audit and Control Committee.

### 11.3 Control and Supervision

Responsibility for controlling the application of this Policy shall lie with the Compliance and Risk Control Department, while the Internal Audit Function shall carry out periodic supervision thereof, submitting the results of such supervision annually to the Audit and Control Committee.

### 11.4 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, 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 24/Feb/2021**

<b>Version</b>	<b>Date of amendment</b>	<b>Purpose of the amendment</b>	<b>Sections affected</b>
1.1	30/Nov/2022	Adapt the system to the recent integration of the Risk Control and Management area under the Regulatory Compliance Department.	
1.2	28/Jun/2023	Include reporting channels for non-compliance in accordance with Law 2/2023.	Reporting of Non-Compliance
1.3	30/Oct/2024	<ul style="list-style-type: none"> <li>- Include due diligence process.</li> <li>- Include a reference to the new internal rules governing the adhesion of the Group companies to 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>- Due Diligence</li> <li>- Awareness and Statement of Compliance</li> <li>- Reporting of Non-Compliance</li> <li>- Dissemination</li> </ul>
1.4	29/Oct/2025	<ul style="list-style-type: none"> <li>- Incorporate the monitoring of the strategic plan among the relevant activities of the Corporate Finance Department.</li> <li>- Modify the procedures relating to the main activities: 1.b) Treasury and 1.c) Accounting.</li> </ul>	<ul style="list-style-type: none"> <li>- Scope of Application and Relevant Bodies</li> <li>- Annex 1</li> </ul>

Last revision, October 2025

# Annexes

### Annex I - List of Procedures (February, 2021)

<b><u>1. PROCEDURES FOR MAIN ACTIVITIES</u></b>	<b><u>2. ACTIVITIES REQUIRING AUTHORISATION AND SUPERVISION</u></b>
<p><b>1.a Reporting to the Group's governing bodies and to the markets</b></p> <ul style="list-style-type: none"> <li>• Reporting calendar (monthly and year-end)</li> <li>• Budget calendar</li> <li>• Reporting, budget and strategic plan documentation</li> </ul>	<p><b>2.a. Management control</b></p>
<p><b>1.b Treasury</b></p> <ul style="list-style-type: none"> <li>• Cash and liquidity management</li> <li>• Financing</li> <li>• Investments (surplus funds)</li> <li>• Foreign exchange</li> <li>• Interest rate</li> <li>• Guarantees and security interests</li> <li>• Banking relationships</li> <li>• Advances (Early Payment Programme)</li> <li>• Granting of loans</li> </ul>	<p><b>2.b. Taxation (transfer pricing)</b></p>
<p><b>1.c Accounting</b></p> <ul style="list-style-type: none"> <li>• Accounting policies, updates and changes in accounting policy (under review)</li> <li>• Impairment of assets (under review)</li> <li>• Provisions, contingent liabilities and other extraordinary accounting entries (under review)</li> </ul>	<p><b>2.c. Organisational changes</b></p> <ul style="list-style-type: none"> <li>• Human Resources matters within the Area</li> <li>• Implementations and/or modifications of systems or applications, etc.</li> </ul>

**Note:** *The list of developed procedures shall be amended in line with the provisions of this Policy, as the scope of activities enabling the Corporate Finance Department to meet the objectives set out in this document is modified.*