

Corporate Human Resources Policy

Approved by the Board of Directors of El Corte Inglés,
S.A. on 25 September 2019
Version 2.0 - 29 January 2025

Table of contents

1. Introduction	3
2. Purpose of the Policy	3
3. Scope of Application	4
4. General Principles of Action	4
4.1. Ethics and Social Responsibility	4
4.2. Human and Labour Rights	5
4.3. Talent Attraction and Recruitment	5
4.4. Talent Management and Commitment	5
4.5. Compensation and Employee Benefits	6
4.6. Work-Life Balance	6
4.7. Diversity, Equity, Inclusion, and Non-Discrimination	6
4.8. Occupational Health and Safety	7
4.9. Employee Relations	8
4.10. Sustainability	8
4.11. Internal Communication and Dialogue Channels	8
5. Awareness and Statement of Compliance	9
6. Reporting of Non-compliance	9
7. Approval, Effective Date and Updating	10
8. Dissemination	10
9. Control and Follow-up	11

1. Introduction

The El Corte Inglés Group (hereinafter referred to as the 'Organisation' or the 'Group') is committed to delivering value for society through excellence in its products and services. To achieve this, we rely on our most important asset: our people. The individuals who make up our team are a key factor in the success of the Organisation's business project.

Our corporate governance model is built on a set of values and principles outlined in our Code of Ethics. The Corporate Human Resources Policy (hereinafter referred to as the 'Policy'), like the other Corporate Policies and internal regulations, builds upon the Code of Ethics, reflecting the Group's commitment to fostering a corporate culture based on ethical business conduct as a fundamental requirement for the development of our activities.

The People and Talent Management Department is responsible for defining, designing, and promoting the Group's human resources management model, ensuring alignment with our corporate strategy, culture, and values. This model is based on the physical, emotional, and social well-being of our employees and upholds core principles such as respect for human and labour rights, ethics and responsibility, compliance with legislation, equal opportunities, diversity and inclusion, professional development, continuous training, occupational health and safety, work-life balance, and overall well-being.

Additionally, the department is tasked with implementing and overseeing the policies and management tools related to our human capital, working in coordination with business areas and cross-functional teams.

2. Purpose of the Policy

The purpose of this Policy is to establish the framework for human resources management across our Group, with the aim of:

- Attracting, developing, and engaging talent to achieve our business objectives and meet the expectations of our stakeholders.
- Promoting the physical, mental, and social well-being of our workforce, while fostering a positive work environment based on trust, respect, collaboration, and recognition.
- Encouraging diversity, inclusion, and equity based on merit and capability, ensuring equality and non-discrimination in all processes and areas of our Organisation, while valuing differences as a source of enrichment and learning. Ensuring compliance with current labour regulations, international human and labour rights standards, and the voluntary commitments undertaken in corporate social responsibility.

- Driving continuous learning, professional development, and personal growth of our teams by providing opportunities for training, mobility, and internal promotion.
- Establishing a fair, competitive, and transparent remuneration system that recognises performance, contribution, and potential of each individual.
- Facilitating work-life balance through flexible working arrangements and other social benefits.
- Safeguarding health and safety within our Group and areas of influence by preventing occupational risks, promoting healthy habits, and ensuring comprehensive care.
- Encouraging participation, dialogue, and internal communication among our teams, as well as with workers' legal representatives, through appropriate and effective channels.
- Promoting social commitment by encouraging our workforce to engage in corporate volunteering, supporting initiatives that contribute to sustainable development and enhancing people's quality of life.

3. Scope of Application

This Policy is mandatory and applies to all Group companies.

All members of the Organisation, irrespective of their position or the territory from which they operate, are required to comply with its provisions, as well as with the Code of Ethics and the principles of human and labour rights. It shall also apply to Business Partners when carrying out activities within the Group.

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

4. General Principles of Action

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

4.1. Ethics and Social Responsibility

At El Corte Inglés, we firmly believe that ethics and social responsibility are fundamental pillars in managing our teams. Therefore, all Members of the Organisation, as well as those working within our value chain, must uphold ethical and socially responsible conduct in all activities and relationships, in alignment with our corporate culture, as outlined in our Code of Ethics. This Code sets out the standards of behaviour that should guide our teams in their interactions with stakeholders.

We place great emphasis on fostering a culture of ethics, compliance, and due diligence. For this reason, the Compliance and Risk Control Department of El Corte Inglés Group, in collaboration

with the Human Resources and Communications Departments, promotes continuous training to ensure awareness and effective understanding of applicable regulations. This department is also responsible for managing the Ethics Channel, ensuring anonymity, confidentiality, respect for the rights of the individuals involved, and data protection.

4.2. Human and Labour Rights

We are committed to respecting and protecting human and labour rights, as recognised by national and international legislation, through responsible business practices. This includes those related to human resources management, based on key international principles, such as: The Universal Declaration of Human Rights, the International Labour Organization (ILO) Conventions and Declarations, the United Nations Global Compact, the 2030 Agenda and Sustainable Development Goals (SDGs), the OECD Guidelines on Due Diligence for Responsible Business Conduct.

To this end, we offer specialised training pathways on this subject, which include general and specific courses, awareness campaigns, and initiatives that extend throughout our value chain.

4.3. Talent Attraction and Recruitment

We are committed to creating a stable and high-quality employment offering, as we firmly believe in its direct impact on job satisfaction, commitment, and the individual well-being of our professionals, all of which strengthen our employer brand.

To achieve this, we actively engage in spaces where relevant knowledge emerges and implement innovative processes to attract and integrate top talent into our team. In our selection processes, we follow guidelines that aim to create a positive experience based on the utmost respect and professionalism, offering a comprehensive and valuable proposal with the aim of attracting people who share the Group's values and recruiting the best talent. We apply transparent, objective criteria based on merit, capability, skills, and experience required for each job position, ensuring compliance with labour regulations, confidentiality, and equal treatment throughout the process.

Our organisational structure is built on an objective and standardised model for assessing and structuring positions, guided by principles of transparency, efficiency, and flexibility. This model aligns with market best practices and European regulatory recommendations, serving as the cornerstone of our Human Resources policies.

4.4. Talent Management and Commitment

We value and actively promote the professional growth of our talent by fostering the development of their professional and personal skills within a collaborative work environment focused on continuous improvement. Opportunities for development are based on objective criteria such as performance, competence, potential, and merit. Our key tools include talent mapping,

performance and potential assessment processes, succession planning, career progression and internal mobility strategies, as well as leadership development for managers and executives

These programmes, built upon transparency and fairness, are periodically assessed for impact and effectiveness, enabling us to identify and develop high-potential profiles that are key to the success of our Group. We tailor these programmes to the needs and aspirations of each team member, fostering initiative and participation at all levels of the Organisation.

Ongoing, up-to-date, and high-quality training is a key pillar of our Human Resources policy. We offer a comprehensive range of training programmes tailored to the needs of each individual and role within our Organisation, fostering collaborative learning, knowledge-sharing, and experience exchange to ensure the highest level of professional development.

4.5. Compensation and Employee Benefits

Our compensation policy recognises professional performance, potential, dedication, availability, and responsibility of our human capital. It is built on transparency, internal fairness, and external competitiveness to enhance employee engagement and development of our professionals.

The remuneration model provides an attractive system based on a total compensation approach, comprising a fixed salary and a variable component linked to achievable objectives and measurable results. We also offer a flexible remuneration system and a wide range of social benefits that complement compensation, enhancing employee well-being, job satisfaction, and commitment, while also contributing to the competitiveness of our Group.

4.6. Work-Life Balance

At El Corte Inglés Group, we have been working to improve our model of flexibility, work-life balance and digital disconnection, with the aim of promoting a balance between the personal, family and professional lives of our teams.

We promote the responsible use of flexible work arrangements and a hybrid organisational model, combining on-site and remote work where applicable. Furthermore, we actively support the right to digital disconnection.

4.7. Diversity, Equity, Inclusion, and Non-Discrimination

The diversity, equity, inclusion, and non-discrimination policies of Grupo El Corte Inglés embody the essence and nature of the Organisation—our way of being, thinking, and acting. They are designed to drive meaningful and necessary change among the people who make up the Organisation and within society, through active engagement.

In today's world, continuous learning and innovation require a diverse workforce, which we fully embrace. We understand and adapt to the reality of each individual within the Group, valuing the diversity of our people and recognising differences as a source of enrichment and

competitiveness. This approach positively impacts talent attraction and engagement while strengthening our corporate reputation.

Our ongoing goal is to create a fully inclusive work environment where everyone feels heard, respected, and valued, enabling us to reach our full potential and contribute our talents.

We guarantee non-discrimination and respect for the dignity and physical and moral integrity of each person in the working environment, through the measures included in the Group's Equality Plans and the protocols for the prevention and treatment of harassment situations.

Our commitment to training and raising awareness among our teams on diversity, equality, equity, inclusion, social responsibility, and human rights is steadfast. We aim to foster a fully integrated and effective work and social environment, regardless of any personal or social circumstances.

We are actively engaged in promoting cultural and generational diversity. We champion gender equality, working towards balanced representation across all levels of our companies. We also implement socially responsible measures that support the real and effective inclusion of individuals from at-risk and socially excluded groups.

4.8. Occupational Health and Safety

At El Corte Inglés Group, we consider meeting the physical, mental, social, and cognitive needs and expectations of our employees a competitive advantage. Beyond mere legal compliance, we believe it is essential for fostering their alignment with the Group's objectives and values.

To achieve this, we integrate the prevention of physical, mental, and social risks into all decision-making processes related to work organisation, ensuring its application across all organisational units and hierarchical levels.

We have a workplace health and safety system that is fully integrated into the Organisation and actively supported by trade unions. This system is based on both regulatory and internal standards and applies to all Group companies. Its primary focus is to promote continuous improvement in our performance and strengthen our preventive culture. Our system is structured around specific programmes and processes that facilitate the identification, assessment, and elimination or control of occupational risks; training and awareness-raising on protection and prevention measures; the implementation of corrective and preventative actions; and the ongoing monitoring of physical and mental health, adapted to individual roles and conditions.

We assess our occupational health and safety performance using key indicators and are committed to continuous improvement in this area.

Through health promotion programmes, we foster the development of individual health resources, aiming to help prevent and address physical or mental health issues, whether they originate in the workplace or in personal life.

4.9. Employee Relations

We ensure regulatory compliance as a reflection of our objectives and the responsible engagement of each individual through their collaboration and commitment. We are committed to establishing a solid framework for labour relations, based on strict adherence to legislation, collective bargaining, freedom of association, and the right to union representation.

Our teams are bound by the collective agreements applicable to the sectors in which the Group operates.

We maintain open and ongoing communication with public administrations, institutions, and business organisations that make up our environment.

The trade unions are our legitimate interlocutors in the negotiation and construction of this effective framework, in a relationship characterised by constructive, fluid and ongoing dialogue and an atmosphere of respect and cooperation that favours freedom of association and collective bargaining.

4.10. Sustainability

Contributing to sustainable development and improving people's quality of life are essential principles in the corporate culture of the El Corte Inglés Group.

We put these principles into practice through specific programmes based on solidarity, cooperation, awareness, and social commitment. Notably, the Group's corporate volunteering programme encourages the active participation of our professionals in charitable initiatives, enhancing their well-being, personal and professional development, and fostering a strong sense of pride and belonging within our team.

4.11. Internal Communication and Dialogue Channels

We recognise the importance of listening to our people. We promote information-sharing and decision-making processes, fostering the team spirit and collaboration that define our Organisation. Understanding the perspectives and experiences of our employees is essential to us.

We want our human capital to be aware of and actively involved in our strategies and objectives. Therefore, we promote the improvement of interpersonal relationships and enhance our internal communication capabilities to foster commitment and alignment between the Group of companies and the people who form part of it.

We provide our teams and other stakeholders with effective communication channels, ensuring agile, efficient, secure, and transparent information exchange. These consultation and participation channels enable us to receive valuable feedback and facilitate interaction between different levels and areas of our Organisation.

5. 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.

6. 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, 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.

- **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.

7. 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 regularly reviewed on an annual basis and, exceptionally, as soon as possible whenever there are changes in strategic objectives or external or internal regulatory amendments that require its update or modification. The aim is to adapt its content to the evolving reality of the El Corte Inglés Group and society while maintaining the commitment of our human capital, an essential and distinctive strategic asset of our Organisation.

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.

8. 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.

9. Control and Follow-up

The Corporate Human Resources and Talent Management Department shall be responsible for controlling and continuously monitoring compliance with this Policy.

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
2.0	29/Jan/2025	<ul style="list-style-type: none">- Align the Policy with the structure of the other Corporate Policies.- Define the Principles- Align Policy with the requirements of the Corporate Sustainability Reporting Directive.- Include a reference to the new internal rules governing the Group companies' compliance with the Corporate Policies.- Update digital channels for reporting non-compliance.	<ul style="list-style-type: none">- All sections