



Compliance Function Charter

Approved by the Board of Directors
of VECI TRAVEL GROUP, S.L.
on 27 September 2017
Version 2.0 (26 February 2026)

GRUPO

VIAJES *El Corte Inglés*

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NOTE: The definitions of the most frequently used terms in this document and in the regulations that make up the VECI TRAVEL GROUP, S.L. Criminal Compliance Management System are provided in **Annex 1**.

Article 1. Introduction and Commitment of the Governing Body

1. The Compliance Function is an integral part of the Corporate Governance, Risk & Compliance (GRC) System of VECI TRAVEL GROUP, S.L. This Function plays a vital role in ensuring that entities within its Criminal Control Perimeter, their governing bodies, departments or areas, their respective managers, and other members comply with both applicable legislation and the internal policies and regulations of VECI TRAVEL GROUP, S.L.
2. This constitutes a further step in the line of action and culture of compliance that the El Corte Inglés Group has actively promoted and upheld since its inception, reflecting a firm commitment to ethical behaviour, integration and social responsibility in the conduct of its business activities.
3. Furthermore, the recognition under criminal legislation of the effectiveness of systems for the prevention of breaches or regulatory non-compliance reinforces the importance of implementing and developing this specific Compliance Function. Its purpose is to support existing controls and to move towards higher standards of commitment and responsibility of the governing bodies in the development of all business activities; to pursue excellence in the management of compliance risks; to enhance coordination in the prevention of non-compliant conduct; and, ultimately, to ensure the overall quality of service provided to our customers.
4. The Compliance Function is therefore focused on embedding and promoting the ethical principles and values of the El Corte Inglés Group through management practices derived from the Compliance System.
5. For these reasons, the Board of Directors of VECI TRAVEL GROUP, S.L., at its meeting held on 11 October 2023, resolved to appoint a Chief Compliance Officer, as a clear expression of its leadership, commitment and involvement in the achievement of the above objectives.

Article 2. Nature and Purpose

1. This Charter constitutes a Policy within the internal regulations of VECI TRAVEL GROUP, S.L., and is intended to be implemented and applied across all entities included within its Criminal Control Perimeter.
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2. The purpose of this Charter is to define the foundations of the Compliance Function, identify the bodies responsible for its implementation, and establish its interaction with operational areas and relevant stakeholders.
3. The approval, amendment and revocation of this Charter fall within the authority of the Board of Directors.

Article 3. Scope, Awareness and Statement of Compliance

1. This Charter establishes the regulatory framework for the Compliance Function of VECI TRAVEL GROUP, S.L., as determined by its Board of Directors.
2. In its drafting, the guidelines of the Compliance and Risk Control Department of El Corte Inglés have been taken into account in order to ensure alignment across all Criminal Compliance Management Systems within the Group.
3. Adherence by the entities included within the Criminal Control Perimeter of the Viajes El Corte Inglés Group to this Charter and to any Compliance Policies that may be issued shall be formalised by acknowledgement by the Boards of Directors of the companies forming part of the Viajes El Corte Inglés Group or, failing that, by notification from the Chief Compliance Officer to the secretaries of such governing bodies.
4. In addition, statements of compliance with the principles set out in this Charter shall be required from Members of the Organisation, as well as specific clauses to be included in contracts with Business Partners.
5. Such adherence shall be renewed whenever this Charter is subject to significant modifications.

Article 4. Regulatory Framework

1. The implementation of the Compliance Function reflects the intention of VECI TRAVEL GROUP, S.L. to align itself with best practices in corporate governance, taking into account the requirements and recommendations of regulatory authorities.
2. The Compliance Function has been established and is regulated taking into account the principles and guidelines derived from the Integrated Internal Control Framework defined by the Committee of Sponsoring Organizations (COSO); the UNE-ISO 37301 standard on Compliance Management Systems; the UNE 19601 standard on Criminal Compliance Management Systems; the Criminal Code approved by Organic Law 10/1995; Circular 1/2016 of the State Attorney General's Office on the Criminal Liability of Legal Persons; and Law 2/2023, of 20

February, regulating the protection of persons who report regulatory breaches and the fight against corruption.

Article 5. Definition of the Compliance Function.

The Compliance Function is an independent organisational unit that holds overall responsibility for the senior management and coordination of the identification, assessment and management of compliance risks arising from both external and internal regulatory obligations impacting the activities of VECI TRAVEL GROUP, S.L. It is responsible for developing and performing the activities of promotion, information, advisory, coordination, communication and reporting necessary to enhance the effectiveness of compliance, for the benefit of VECI TRAVEL GROUP, S.L.

Article 6. Objectives of the Compliance Function

The objectives of the Compliance Function are as follows:

- a. To identify and evaluate the risks of non-compliance with external and internal regulations applicable to VECI TRAVEL GROUP, S.L., across its various activities.
- b. To assess the adequacy of VECI TRAVEL GROUP, S.L.'s compliance procedures and controls, by monitoring identified deficiencies and proposing the necessary improvement measures through one or more Compliance Plans, ensuring that all areas and sectors of activity are adequately covered.
- c. To advise the Board of Directors and its members on compliance with the legal and regulatory provisions affecting VECI TRAVEL GROUP, S.L., as well as with the internal self-regulatory rules and principles developed or voluntarily adopted by VECI TRAVEL GROUP, S.L.
- d. To promote the Code of Ethics and the Ethical Channel, as well as the Compliance Policies of the El Corte Inglés Group to which VECI TRAVEL GROUP, S.L. has adhered, in areas such as Criminal Liability, Data Protection, Prevention of Money Laundering, Prevention of Corruption and Fraud, Prevention of Discrimination and Harassment, Real Estate and Urban Planning Compliance, Consumer Affairs and Competition, Public Health, Environment, Sustainability, among others.
- e. To collaborate with the Compliance and Risk Control Department of the El Corte Inglés Group, when required, in the handling of communications received through the Ethics Channel, via any of the means made available by the Organisation to Members of the Organisation and other stakeholders.

- f. To evaluate and report on the impact that any changes in the national or international legal and jurisprudential environment may have on the operations of VECI TRAVEL GROUP, S.L., as well as on any new Compliance Risks that may arise as a result of such changes.
- g. To periodically report on Criminal Compliance matters to the Board of Directors and, where appropriate, to Senior Management, areas, departments, organisational units and Group companies, with the aim of informing and, where applicable, promoting the adoption of preventive, effective, corrective and remedial actions in relation to incidents associated with Compliance Risks, particularly Criminal Compliance Risks.
- h. To prepare an Annual Compliance Report for submission to the Board of Directors.

Article 7. Board of Directors

1. The Board of Directors, as the body ultimately responsible for the management of VECI TRAVEL GROUP, S.L., is entrusted with the governance and representation of the Organisation.
2. In relation to the Compliance Function, the Board of Directors is responsible for the adoption and effective implementation, prior to the commission of any offence, of organisational and management models that include appropriate monitoring and control measures to prevent the commission of criminal offences or to significantly reduce the risk thereof. To this end, the Board of Directors assumes responsibility for the development, management and administration of general policies and strategies, and holds ultimate responsibility for the overall Compliance model implemented at VECI TRAVEL GROUP, S.L.

Article 8. Management Committee

1. The Management Committee shall support the General Management of VECI TRAVEL GROUP, S.L. in promoting the culture of Ethics and Compliance and in the effective implementation of the Compliance Management System and, in particular, the Criminal Compliance Management System, throughout the Organisation.

Article 9. Operational Directors

1. The members of the Organisation's operational management bodies at its centres, departments and organisational units are responsible for complying with and ensuring compliance, within their respective areas of responsibility, with the rules governing the Organisation, in accordance with the highest ethical standards and a strong commitment to business and social responsibility.

2. Through procedures of instruction, delegation and supervision, operational directors shall ensure that these objectives and responsibilities are effectively shared across the entire organisational structure, within their respective areas of activity.
3. This approach ensures that all members of the Organisation's workforce who carry out their work within the Company receive appropriate training and clear guidance for the application of consistent ethical, compliance and consumer service principles in the performance of any task.

Article 10. Chief Compliance Officer

1. The Board of Directors of VECI TRAVEL GROUP, S.L. entrusts the exercise of the Compliance Function to a Chief Compliance Officer.
 2. The Chief Compliance Officer shall be appointed by the Board of Directors for a term of four years. The Board of Directors shall also determine the remuneration and contractual conditions of the position, as well as any removal therefrom.
 3. The appointment shall fall upon a person of proven integrity, commitment and good repute, with knowledge of the external and internal regulations applicable to VECI TRAVEL GROUP, S.L., as well as a global vision of the business, experience in the field, authority and capacity to influence, and with no conflict of interest in relation to the position. When assessing these criteria, consideration shall be given to the candidate's professional and personal background, based on appropriate evidence such as curriculum vitae references and criminal record certificates.
 4. The Chief Compliance Officer shall enjoy functional and organisational independence within the personnel and departmental structure of VECI TRAVEL GROUP, S.L., reporting directly to the Board of Directors on the management and effectiveness of the Compliance Model implemented, in particular the Criminal Compliance Model.
 5. The Chief Compliance Officer shall have a team at their disposal, equipped with the material and human resources that are necessary and sufficient for the performance of their responsibilities. For the proper performance of their duties, the Chief Compliance Officer may appoint Compliance Representatives in the areas and companies of the Viajes El Corte Inglés Group that they deem appropriate.
 6. The Board of Directors shall annually approve the budget for the material and human resources allocated to the Compliance Function, as well as any subsequent amendments thereto.
 7. The Chief Compliance Officer shall have the authority and legitimacy within VECI TRAVEL GROUP, S.L. to request any information supporting and evidencing compliance with corporate policies, procedures and implemented controls, and to access all documentation and information necessary to supervise and verify that the Compliance Function is carried out effectively and efficiently, except where access is restricted by law or regulatory provisions.
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8. The Chief Compliance Officer may obtain external advice, within the allocated budget, for the proper performance of the Compliance Function.
9. The Compliance Function of VECI TRAVEL GROUP, S.L., within the scope of its responsibilities and with the autonomy granted by this Charter, shall coordinate with the Compliance and Risk Control Department of the Group, following the guidelines received in relation to:
 - the promotion of adherence to and/or adaptation of its internal regulations to the Ethical Standards and Corporate Policies of the El Corte Inglés Group;
 - the prevention, detection and response to compliance risks, particularly those of a criminal nature;
 - the periodic and systematic reporting of significant Compliance incidents and on the effectiveness of the Compliance System, particularly Criminal Compliance;
 - the collaboration in the handling of complaints received through the El Corte Inglés Group's Ethics Channel and in the processing of declarations of conflicts of interest; and
 - in general, the supervision of the effectiveness of the operation of the Group's Compliance Management System and, in particular, the Criminal Compliance Management System.
10. The Compliance Function of VECI TRAVEL GROUP, S.L. may appoint Compliance Representatives in the companies of the Viajes Group that it deems necessary for the proper performance of its duties.

Article 11. Performance of the Duties Assigned to the Chief Compliance Officer

The Chief Compliance Officer shall carry out their duties with the objective of promoting and reinforcing a culture of Ethics and Compliance at all levels of the Organisation, in order to ensure the proper integration, in each area and level of decision-making and in the tasks to be performed, of compliance with both applicable legislation and the Organisation's internal policies and regulations.

The areas of activity of the Chief Compliance Officer shall be as follows:

1. Promotion of a Compliance Culture:
 - Promoting training, assimilation and the effective knowledge of applicable regulations, ensuring the transmission of the concept of effective and genuine compliance with the regulations affecting the Organisation, in collaboration with all areas and departments.
 - Submitting for approval by the Board of Directors the Compliance Programme and the internal regulations defining the general framework of action for all persons carrying out activities within or in relation to VECI TRAVEL GROUP, S.L.

- Defining, managing and evaluating the procedures for the development of Policies and other internal regulations, so that they contribute to the prevention and/or mitigation of the commission of criminal offences or other types of non-compliance.
 - Coordinating with the Data Protection Officer (DPO) the submission to the Board of Directors of the information arising from their activities in the promotion, updating and implementation of the Organisation's Compliance Policies in matters relating to Data Protection.
2. Regulatory Compliance Risk Management:
- i. Preventive Management:
 - Identifying and assessing the risk of regulatory non-compliance, whether arising from external or internal regulations..
 - Preparing policies, procedures, alerts and controls aimed at ensuring regulatory compliance, and collaborating in their implementation across all affected areas.
 - Advising areas and departments on the criteria for the application of compliance controls, policies and procedures, so that each area of responsibility has the information, training and capabilities required for the performance of its tasks.
 - Providing compliance advice in relation to the creation or launch of new products or services, or the exploration of new activities.
 - ii. Reactive Management:
 - Monitoring and managing identified deficiencies, formulating the necessary improvement proposals through specific Plans and/or Programmes, or amendments to those in force, in order to ensure that all areas and sectors of activity are adequately covered.
3. Advice and Assessment of the Regulatory Framework:
- Advising the Board of Directors and its members on compliance with the legal and regulatory provisions affecting VECI TRAVEL GROUP, S.L., in collaboration with the Legal Advisory function.
 - Reporting on the level of compliance with self-regulatory rules and principles developed internally or voluntarily adopted.
 - Assessing and reporting on the impact that any changes in the national or international legal and jurisprudential environment may have on the operations of VECI TRAVEL GROUP, S.L., as well as on any new risks of non-compliance that may arise as a result of such changes.
4. Reactive Management of Non-Observance or Non-Compliance
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- Collaborating with the Compliance and Risk Control Department of the El Corte Inglés Group in the handling of communications received through the El Corte Inglés Group's Ethics Channel, in order to analyse and resolve them appropriately, assessing the existence of regulatory non-observance or non-compliance and the corresponding corrective and preventive measures.
- Supporting the Compliance and Risk Control Department of the Group in the processing of declarations of conflicts of interest received.
- Defining, in coordination with Human Resources, the corrective systems and procedures applicable to irregular or unlawful conduct.

5. Information.

- The Chief Compliance Officer, in the performance of the Compliance Function, shall inform the Board of Directors, at least annually or with such frequency as may be required, of the risk management carried out, the level of risk, the existing controls and their effectiveness, as well as the improvement proposals deemed appropriate, thereby enabling the Board of Directors to be informed of, accept or require amendments to the management system, risk levels or proposed corrective and improvement measures.
- Without prejudice to the foregoing, the Chief Compliance Officer shall provide prompt and comprehensive information to the Board of Directors in the event of any relevant situation affecting regulatory compliance, in particular regulatory changes impacting VECCI TRAVEL GROUP, S.L.

Article 12. Relationship with the Data Protection Officer (DPO)

1. The Chief Compliance Officer and the Data Protection Officer shall coordinate their activities in order to ensure the proper application of the Organisation's Compliance Policies in the areas within their respective scope.

Article 13. Relationship with the Management Bodies and Officers of the Entities within the Criminal Control Perimeter of VECCI TRAVEL GROUP, S.L., its Operational Areas and Departments

1. The management bodies and officers of the entities forming part of the Criminal Control Perimeter of VECCI TRAVEL GROUP, S.L., as well as those of its operational areas and departments, shall provide full cooperation to the Chief Compliance Officer in order to facilitate the performance of the duties assigned thereto.
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2. The Compliance Function, while independent from the Organisation's structure, can only be effectively carried out with the direct cooperation of the operational areas. Accordingly, the Chief Compliance Officer shall, whenever possible, take into account the input of the executives, officers or professionals affected by its actions, aimed at improving their execution, and shall provide them with information regarding the purpose and scope thereof, except where such disclosure would not be appropriate in light of the objective of the action.
3. In order to improve the effectiveness of the Compliance Function in the subsidiaries of VECI TRAVEL GROUP, S.L., the Chief Compliance Officer may appoint Compliance Representatives therein. These Representatives shall support the Chief Compliance Officer in any tasks or projects assigned to them and shall report to the Chief Compliance Officer on their performance.

Article 14. Stakeholders

1. In the performance of the Compliance Function, the Chief Compliance Officer shall pay particular attention to the paramount importance of meeting customer expectations in all actions undertaken by the Organisation, with special regard to strict compliance with the regulations governing the relationship with consumers, as well as with the principles of conduct established by the Organisation.
2. With respect to the workforce of the entities included within the Criminal Control Perimeter of VECI TRAVEL GROUP, S.L., and through the channels enabled by the Human Resources function, the Organisation shall promote: (i) adequate, sufficient and effective knowledge of the compliance obligations associated with each position, as well as awareness of the Code of Ethics in force within the Organisation; (ii) the assessment of performance consistent with Compliance standards; (iii) respect for employees' rights recognised under applicable legal or contractual provisions; and (iv) the proper functioning of the communication channels provided through the Ethics Channel.
3. With regard to companies supplying products or services to, or collaborating in the activities of, the Organisation, appropriate means shall be made available to ensure awareness of the principles of conduct they are required to observe in order to maintain business relationships with the Organisation. In this respect, cooperation shall be encouraged to enhance compliance synergies, in connection with the Codes established by such companies and the actions necessary to ensure effective coordination in pursuit of shared objectives.

4. As regards organisations, associations, institutions, regulatory bodies or public administrations which, by virtue of their functions or interests, require information, participation or assistance from the Organisation, every effort shall be made to cooperate in all matters contributing to progress and the achievement of common societal objectives, as well as with those exercising inspection or supervisory functions, in order to ensure an effective response to regulatory compliance requirements.

Article 15. Involvement of the Entities within the Criminal Control Perimeter

1. As stated above, it is the intention of the Board of Directors that the Compliance Function be implemented across all entities included within the Criminal Control Perimeter of VECI TRAVEL GROUP, S.L.
2. The adherence of the entities included within the Criminal Control Perimeter to this Charter and to the Compliance Policies that may be issued shall be formalised by acknowledgement by their respective Governing Bodies and, where this is not possible, by notification from the Chief Compliance Officer to the secretaries of such bodies.
3. To this end, the Chief Compliance Officer shall propose to the governing bodies of the entities included within the Criminal Control Perimeter the appropriate plans, programmes or measures so that, within a coordinated framework allowing for the necessary autonomy and adaptation of the model while ensuring unity of direction and criteria, all tasks required to achieve the objectives set out in Article 6 are carried out in each entity.
4. In the implementation process, the principles of proportionality and efficient use of resources shall be taken into account, in order to avoid imposing procedural requirements disproportionate to the size of each entity and to make use, wherever possible, of existing shared services.

Article 16. Relationship with Other Activities of the El Corte Inglés Group

1. The Chief Compliance Officer shall coordinate with the compliance officer for subsidiaries of the El Corte Inglés Group, with the aim of unifying criteria, priorities and methods and coordinating their actions in order to ensure compliance with applicable regulations in all areas of activity and to achieve the general objectives set out in this Charter.
2. In relation to EL CORTE INGLÉS' activities in other countries, the Chief Compliance Officer shall propose appropriate procedures to ensure the application of consistent standards and methods, in line with the general objectives set out in this Charter. These procedures shall also take into account the particular requirements of national or local regulations in each country.

Article 17. Control, Monitoring and Supervision

1. The Chief Compliance Officer shall be responsible for controlling and continuously monitoring compliance with this Charter, in accordance with the procedure set out therein, as well as with the Regulations of the Compliance Function Bodies, in coordination with the Compliance and Risk Control Department of the El Corte Inglés Group.
2. The Chief Compliance Officer shall also be responsible for promoting actions to ensure its proper dissemination and awareness.
3. The Internal Audit Function shall review the 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.
4. 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.

Article 18. Approval, Effective Date and Updating

1. This Compliance Function Charter was approved by the Board of Directors of VECI TRAVEL GROUP, S.L. at its meeting held on 11 October 2023 and updated on 26 February 2026.
2. From that moment, it is fully in force in all its terms.
3. This Charter 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, whenever there are changes in the strategic objectives or applicable legislation, and a proposal for amendment shall be submitted by the Chief Compliance Officer to the Board of Directors for approval.

Article 19. Dissemination

1. Once approved by the Board of Directors of VECI TRAVEL GROUP, S.L., this Charter shall be accessible on NEXO for all Members of the Organisation and on the corporate website for all stakeholders of the Viajes El Corte Inglés Group.
2. Likewise, the Chief Compliance Officer, in coordination with the Compliance and Risk Control Department of the El Corte Inglés Group, shall promote the necessary actions to ensure its proper dissemination and awareness.

VERSION HISTORY

Version 1.0 approved by the Board of Directors on 11 October 2023.

Version	Date of amendment	Purpose of the amendment	Sections affected
2.0	December 2025	<ul style="list-style-type: none"> • Include the Compliance Representatives role • Extend the requirements for the Chief Compliance Officer • Incorporate the Dissemination section • Include Article 17 Control, Monitoring and Supervision • Include Article 19 Dissemination • Remove references to the Compliance Committee • Remove the article relating to the DCI • Harmonise the final sections: 'Control, Monitoring and Supervision', 'Approval and Entry into Force' and 'Dissemination' 	<ul style="list-style-type: none"> • Article 3. Scope, Awareness and Statement of Compliance • Article 6 Objectives of the Compliance Function • Article 10 Chief Compliance Officer • Article 11 Performance of the Duties Assigned to the Chief Compliance Officer • Article 17 Control, Monitoring and Supervision • Article 19 Dissemination

Last review: 26 February 2026.

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 Criminal Compliance Management System of VECI TRAVEL GROUP, S.L.

- **Board of Directors:** The body ultimately responsible for the management and results of the activities carried out by the Company, its system of governance and corporate policies, to which Senior Management reports and is accountable.
- **Business Partners:** Any natural or legal 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 VIAJES EL CORTE INGLÉS GROUP for the delivery and/or receipt of goods and/or the provision of services.
- **Chief Compliance Officer:** 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 Block:** Each area or function of the Organisation whose activity is relevant to the development of the Compliance Policy is considered a Compliance Block.
- **Compliance Function Charter:** A document defining the foundations of the Compliance Function of VECI TRAVEL GROUP, S.L.
- **Compliance Programme:** A document describing the rules and organisational documents in place within VECI TRAVEL GROUP, S.L. in relation to Criminal Compliance, including the measures designed to assess, prevent, detect and manage Criminal Risks at an early stage.
- **Compliance Risk:** Risk related to the uncertainty regarding non-compliance and/or non-conformity with Compliance Requirements. This includes, among others, risks associated with the different regulatory blocks impacting the Organisation's activities, as identified by the Organisation.
- **Crime Prevention Policy (Criminal Compliance Policy):** A document reflecting the commitment of Senior Management and the Board of Directors of VECI TRAVEL GROUP, S.L., as well as the Organisation's strategic objectives in this area, including its determination not to tolerate any conduct that may constitute a criminal offence or non-compliance.

- **Criminal Compliance Management System:** A crime prevention system aimed at preventing, detecting, managing and reporting Criminal Risks, integrated into business processes and subject to ongoing supervision and continuous improvement. It is also referred to as the 'System'.
- **Criminal Control Perimeter:** It includes VECI TRAVEL GROUP, S.L. and the entities that adhere to the Crime Prevention Policy and to the broader Criminal Compliance Management System of VECI TRAVEL GROUP, S.L. by decision of their Boards of Directors, and which do not have autonomous management in this area.
- **Management Committee:** A collegial decision-making body that supports the General Management of VECI TRAVEL GROUP, S.L. in the performance of the duties entrusted to it by delegation of the Board of Directors.
- **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.
- **Non-Compliance:** Any act or omission that constitutes a breach of the regulations applicable to VECI TRAVEL GROUP, S.L. Non-compliance may vary in severity, ranging from the mere formal breach of a requirement set out in an internal rule to the commission of acts that may constitute a criminal offence potentially attributable to the Organisation.
- **Non-conformity:** Failure to comply with a requirement.
- **Operational Directors:** Members of the Organisation who, as the first line of defence, are responsible for complying with the policies and procedures established by the Organisation.
- **Persons covered by this document:** All Members of the Organisation, as well as Business Partners or Third Parties having a business relationship with the VIAJES EL CORTE INGLÉS GROUP.
- **Persons in Particularly Exposed Positions:** Persons who participate in activities exposed to a Criminal Risk assessed as higher than "low" in the Criminal Risk matrix of VECI TRAVEL GROUP, S.L.
- **Regulations of the Compliance Function Bodies:** A document governing the functioning of the bodies that make up the Compliance Function of the VIAJES EL CORTE INGLÉS GROUP.
- **Requirement:** A stipulated and mandatory obligation. Requirements may arise from criminal laws and supplementary regulations or be established by the VIAJES EL CORTE INGLÉS GROUP through the Crime Prevention Policy or any of the documents supporting and developing the Criminal Compliance Management System.
- **Senior Management:** The body of VECI TRAVEL GROUP, S.L. that directs and controls the management of the Organisation. Within VECI TRAVEL GROUP, S.L., Senior

Management currently resides in the directors who perform executive functions or those executives recognised as such by the Board of Directors.

- **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. The main Stakeholders considered are listed in Annex 2 of the Compliance Programme.
- **Third Party:** Any natural or legal person or independent body external to the Organisation.
- **VECI TRAVEL GROUP, S.L. / Group / Organisation:** The group of companies that make up the VIAJES EL CORTE INGLÉS GROUP.