



Compliance Policy

Approved by the Board of Directors
of VECI TRAVEL GROUP, S.L.
on 11 October 2023.

Version 2.0 (26 February 2026)

GRUPO

VIAJES *El Corte Inglés*

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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 Criminal Compliance Management System of the VIAJES EL CORTE INGLÉS GROUP are set out in **Annex 1**.

1. Purpose of the Policy

This Policy develops the provisions set out in the Code of Ethics of the El Corte Inglés Group, to which VECI TRAVEL GROUP, S.L. has adhered and, accordingly, is aligned with its ethical values, reaffirming **the commitment of the VIAJES EL CORTE INGLÉS GROUP to maintaining conduct that is respectful of both applicable regulations and its ethical values**, and defining its framework of **Compliance principles** for this purpose.

This Policy is aligned with and represents a continuation of the culture of ethics, integrity and respect for regulations that the VIAJES EL CORTE INGLÉS GROUP (hereinafter, the 'Organisation') has consistently upheld and promoted, and takes into account not only its interests, but also the expectations of its stakeholders and of society as a whole.

It is therefore aligned with the Organisation's strategic objectives and, consequently, with its **determination not to tolerate within the Organisation any conduct that may constitute non-compliance**. This Policy evidences and reaffirms the strongest commitment of the Board of Directors and Senior Management, as well as of all other Members of the Organisation, to comply with that determination.

Through this Policy, the Organisation establishes the basic guidelines to be followed in matters of Compliance for observance by the entire Organisation, with the aim of preventing, detecting and managing any improper conduct or regulatory non-compliance in the performance of its activities, placing particular focus, for the time being, on the prevention of the commission of offences with an impact on the criminal liability of legal persons, while aiming to extend its scope to the rest of the regulations applicable to the activities carried out within the VIAJES EL CORTE INGLÉS GROUP.

2. Scope of Application

2.1. Entities and Persons Covered

This Policy is mandatory and applies globally to all companies within the VIAJES EL CORTE INGLÉS 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 in accordance with the provisions set out in section 6 'Awareness and Statement of Compliance'.

2.2. Activities Covered

The activities covered by this Policy are all those currently carried out, or that may be carried out in the future, by the Organisation in the course of its business activity.

Accordingly, this Policy applies to all actions and functions performed by operational management, departments, services, areas or organisational units involved in the exercise of such activities, whether or not specific policies governing their particular function exist.

3. Principles

The VIAJES EL CORTE INGLÉS GROUP expects all Members of the Organisation and other stakeholders to comply with the following principles:

- **Respect for the law:** The Organisation ensures compliance with all applicable laws, regulations and standards in all jurisdictions in which it operates.
- **Integrity and Ethics:** The Organisation is committed to acting with integrity and ethics in all its activities, promoting a working environment that values compliance with the principles and values set out in the Group's Code of Ethics.
- **Transparency and Independence:** The Organisation is committed to maintaining the highest standards of transparency and independence in all its activities, fostering the clear and accessible communication of its policies, procedures and decisions.
- **Prohibition of All Forms of Corruption and Fraud:** The Organisation does not permit, authorise or tolerate, in any way or under any circumstances, that Members of the Organisation carry out or participate in any act of corruption, bribery or fraud in the course of their professional activities, whether in dealings with public or private entities.
- **Risk Prevention:** Proactive measures are implemented to identify, assess and mitigate compliance risks, ensuring that decisions are taken on the basis of accurate and reliable information.
- **Shared Responsibility:** All Members of the Organisation are responsible for complying with the Compliance Policies and for fostering a culture of Ethics and Compliance within the Organisation.
- **Reporting of Non-Compliance:** Any Member of the Organisation who detects a breach of applicable regulations, or has doubts as to whether an observed practice may constitute an unlawful act, is required to immediately contact the Compliance and Risk Control Department of the El Corte Inglés Group through the Ethics Channel, using the

communication channels made available for this purpose. Through this Channel, the Organisation guarantees secure and confidential mechanisms that allow Members of the Organisation and other stakeholders to report breaches without fear of retaliation of any kind.

- **Continuous Improvement:** The Criminal Compliance Management System shall be periodically reviewed and evaluated in order to update it in line with changes in the Organisation's strategic objectives or with any regulatory developments, whether internal or external.
- **Coordination and Supervision:** The Organisation shall cooperate with El Corte Inglés, S.A. and with the companies of its Group so that all the Group's Compliance Systems are based on homogeneous principles that ensure that each of them is effective, autonomous, robust and applicable to all the activities they carry out.

4. Organisational Measures

4.1 Regulatory Compliance Body

4.1.1 Composition

The VIAJES EL CORTE INGLÉS GROUP has a Regulatory Compliance Body entrusted with compliance functions and responsible for ensuring the effectiveness of this Policy through the implementation of the measures provided for in the System that supports it.

The Board of Directors of VECI TRAVEL GROUP, S.L. appoints the Chief Compliance Officer, granting them autonomous powers of initiative and control, as well as the highest possible level of independence to perform their duties, free from any business constraints that could impair the performance thereof.

In addition, the Chief Compliance Officer of the VIAJES EL CORTE INGLÉS GROUP may be supported by appointing Compliance Representatives in the entities within the Criminal Control Perimeter of VECI TRAVEL GROUP, S.L., where this is deemed advisable.

Under the terms of this Policy, the Chief Compliance Officer enjoys the full support of the Board of Directors of VECI TRAVEL GROUP, S.L. and is entrusted with responsibility for supervising the operation and compliance of the Compliance Management System. To this end, the Chief Compliance Officer is empowered to freely access the Organisation's information and documentation necessary for the proper and effective performance of their functions, as well as to request the collaboration of Members of the Organisation as required. Members of the Organisation are obliged to provide, without delay, the information and documentation requested, always in accordance with the principles of proportionality and appropriateness.

The Chief Compliance Officer performs their duties autonomously, without the need for specific mandates, pursuant to this Policy and the other documents forming part of the Criminal Compliance Management System.

The independence of the Chief Compliance Officer guarantees neutrality in decision-making. This independence is reinforced by the Chief Compliance Officer's functional relationship with and direct access to the Board of Directors, ensuring autonomy in the exercise of their functions with respect to the rest of the operational management units. In addition, the performance evaluation of the Chief Compliance Officer ultimately corresponds to the Board of Directors.

The Chief Compliance Officer of VECI TRAVEL GROUP, S.L., within the scope of their responsibilities and with the autonomy granted by the 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 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.

4.1.2 Main Responsibilities

The main responsibilities of the Chief Compliance Officer are grouped as follows:

1. **Promote and supervise the implementation of the Organisation's Criminal Compliance Management System**, ensuring that all persons affected by this document have access to the Organisation's rules for the prevention of Compliance Risks.
2. Promote the **identification of Compliance obligations** through the heads of the different operational management areas, contributing to keeping them up to date and disseminating them among Members of the Organisation.

3. Promote the **identification and management of Compliance Risks**, analysing and assessing them in order to prioritise actions and allocate resources for their prevention, detection and management.
4. Promote **awareness-raising and training** cycles enabling the persons covered by this document to acquire the **knowledge and skills** necessary to fulfil their responsibilities in the prevention, detection and management of Compliance Risks.
5. Advise the Board of Directors, Senior Management and any other Member of the Organisation who may require it, and **report** to the Board of Directors and Senior Management on the results derived from the implementation and performance of the Compliance Management System, as well as on the reports issued by the different activity blocks.
6. Collaborate 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**, as a tool for collecting information on potentially unlawful conduct or irregularities.
7. Properly **identify**, and in an appropriate format, both **the information relating to the pillars of the Compliance Management System and, in particular, the Criminal Compliance Management System**, as well as the **documentation derived** from its implementation, ensuring its availability (except for information which, due to confidentiality reasons, is accessible only to certain areas of the Organisation), its suitability for use, traceability of access and preservation of legibility.
8. **Measure the performance** of the Compliance Management System and, in particular, the Criminal Compliance Management System through indicators, ensuring that all its elements operate correctly and promoting its **review and continuous improvement**.
9. **Periodically assess the effectiveness** of the Criminal Compliance Management System and, where appropriate, modify it when serious breaches are identified through any channel or when significant changes occur in the Organisation's circumstances, Compliance Risk assessment or Compliance objectives.

The specific responsibilities of the Chief Compliance Officer in relation to the different aspects of the Organisation's activities are set out in the relevant policies and management systems. Operational Directors shall, within their respective areas, be responsible for directly performing or supporting the performance of the tasks referred to above.

4.2 Obligations of the Members of the Organisation

Since compliance with the law and the proper implementation of the Criminal Compliance Management System concerns all Members of the Organisation, they are expected,

regardless of their position within the Organisation, to: (i) act ethically at all times and refrain from committing criminal offences or breaching the Organisation's external or internal rules; (ii) report any irregularity they become aware of that involves a breach of internal or external rules; and (iii) duly follow the guidance provided through communication, awareness-raising and training actions and, where applicable, any guidance they may receive from the Chief Compliance Officer in the exercise of the functions described above.

4.2.1 Members of the Organisation

All Members of the Organisation shall be responsible for:

1. **Knowing, observing and applying** the provisions set out in **El Corte Inglés' Code of Ethics**, this Compliance Policy and the Corporate Policies, rules and procedures applicable to them, formally declaring their express compliance with and adherence to them.
2. **Reporting as soon as possible**, using the channels provided for this purpose, any irregularity of which they are aware or which they reasonably foresee in the performance of their duties, as well as any actions that could reasonably prevent or remedy it and that have not been implemented.
3. **Attending the Regulatory Compliance training sessions** determined in light of their role or position within the Organisation.
4. **Cooperating with the Chief Compliance Officer** when required and providing, without delay, any information and documentation they may request in the exercise of their function.

4.2.2 Board of Directors and Senior Management

The Board of Directors and Senior Management not only support the Chief Compliance Officer in the exercise of their functions, but also actively promote a culture of compliance within the Organisation, ensuring that they have the appropriate resources to implement the System effectively and encouraging the use of the procedures and channels provided for reporting potentially irregular or criminal conduct that may affect the Organisation and its activities, among other matters.

In addition to the obligations incumbent on all Members of the Organisation (see previous section), the Board of Directors and Senior Management of the VIAJES EL CORTE INGLÉS GROUP have the specific obligations set out below.

(i) Obligations of the Board of Directors

The Board of Directors shall be responsible for:

1. **Formally approving this Policy** — as well as any updates that may be required — and promoting the adoption and **implementation of a Criminal Compliance**
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Management System appropriate to the Organisation, suitable for preventing, detecting and managing the Compliance Risks that may affect the activities carried out by the Organisation.

2. **Appointing, for the implementation of the Compliance Model and the System, a Chief Compliance Officer**, as a body of the legal entity with autonomous powers of initiative and control, allocating the appropriate and sufficient financial, material and human resources to enable them to perform their work effectively.
3. Receiving, **reviewing and responding appropriately to the reports** provided by the Chief Compliance Officer, adopting such actions as it deems most appropriate for the proper management of Compliance Risks, whether at the initiative of the Chief Compliance Officer or on its own initiative.
4. **Ensuring the establishment of processes for forming the Organisation's will** that reduce the likelihood of materialisation of those Compliance Risks that have received a rating higher than low. Supervising the procedures and controls associated with the delegation of powers for the Organisation's decision-making, as carried out by the Chief Compliance Officer or Senior Management.

(ii) **Obligations of Senior Management**

Senior Management collaborates with the Board of Directors in the performance of its responsibilities, particularly with regard to the dissemination of the Organisation's Compliance culture and the effective application of a **zero-tolerance approach to conduct that may constitute breaches**.

Given its proximity to the Organisation's strategic and operational objectives and its hierarchical position, Senior Management shall be responsible for:

- **Leading and supporting** all Members of the Organisation in the performance of their compliance obligations.
 - **Ensuring** that they **incorporate such obligations into their day-to-day activities** within the Organisation.
 - **Ensuring that the requirements arising from the System are incorporated into all the Organisation's processes and procedures**, leading and supporting Members of the Organisation in complying with the requirements and ensuring the effectiveness of the System.
 - **Ensuring the availability of appropriate and sufficient resources** for the effective implementation of the System, communicating internally the importance of such implementation consistently with this Policy.
 - **Participating in the approval processes for the identification, analysis and assessment of Compliance Risks**.
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- **Encouraging** Members of the Organisation and Third Parties to **use the channels provided** for reporting potentially irregular or criminal conduct that may affect the Organisation and its activities, guaranteeing the absence of retaliation, discrimination or sanctions for communications made in good faith or for actions aimed at avoiding participation in criminal conduct.

4.2.3 Management Committee

The **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.

4.2.4 Operational Directors

Directors of subsidiaries, departments and organisational units shall be responsible for complying with, and ensuring compliance within their area of responsibility with, the policies, rules and procedures governing the Organisation, and for acting ethically and responsibly at all times.

Accordingly, they shall be responsible for:

1. **Maintaining an effective control environment**, ensuring that their areas of responsibility act in accordance with applicable legislation and the internal regulations in force.
2. **Ensuring the correct implementation of Compliance controls** by supervising their execution by the relevant areas.
3. **Involving and coordinating the persons under their charge** in order to ensure the effectiveness of actions aimed at disseminating the compliance culture and preventing any irregular action. This is to be achieved through instruction, delegation and supervision procedures, as regulated in the Regulations of the Compliance Function Bodies.

5. Third-party Due Diligence

In accordance with the due diligence procedures that the VIAJES EL CORTE INGLÉS GROUP must follow in the selection of Third Parties to ensure compliance with criminal law, the VIAJES EL CORTE INGLÉS GROUP shall monitor the conduct of those who, being subject to the authority of its legal representatives and *de jure* or *de facto* directors, may have engaged in criminal conduct as a result of a serious breach of their duties of supervision, monitoring and control, taking into account the specific circumstances of the case, regardless of whether they are Members of the VIAJES EL CORTE INGLÉS GROUP or Business Partners.

For this purpose, Business Partners shall be required to sign the Commitment and Adherence Letter, as well as a specific Compliance clause in their contracts.

6. 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, through their adherence to the **High Ethical Standards**.
- ii. **Compliance clauses included in contracts** with Business Partners
- iii. **Acknowledgement or notification** to the governing bodies of the companies dependent on VECI TRAVEL GROUP, S.L. and, where this is not possible, through communication by the Chief Compliance Officer of the Viajes El Corte Inglés Group to the secretaries of such governing bodies.

In the event of significant changes to this Policy (i.e. changes that require formal approval from the Board of Directors of VECI TRAVEL GROUP, S.L.), the preceding commitments shall be formally renewed.

The acknowledgements or notifications to the governing bodies of the companies of the VIAJES EL CORTE INGLÉS GROUP shall be communicated, once formalised, by the Chief Compliance Officer to the Compliance and Risk Control Department of the EL CORTE INGLÉS Group.

7. Reporting of Non-Compliance

Any Member of the Organisation, Business Partner or Third Party with a direct relationship and a legitimate commercial or professional interest who becomes aware of 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 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 provides a digital channel accessible 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.
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 Chief Compliance Officer may act on its own initiative by investigating any indication of non-compliance with this Policy.

All queries, observations or reports relating to Criminal Compliance shall be handled by the Compliance and Risk Control Department of the El Corte Inglés Group in accordance with the provisions set out in the Ethics Channel Management Procedure, with the collaboration of the Chief Compliance Officer of the VIAJES EL CORTE INGLÉS GROUP in the handling of reports relating to the VIAJES EL CORTE INGLÉS GROUP, in accordance with the provisions of the Compliance Function Charter and the Compliance Programme of the VIAJES EL CORTE INGLÉS GROUP.

8. Investigation of Non-Compliance

Where appropriate, and on the basis of the indications of veracity obtained, the Chief Compliance Officer shall investigate, in coordination with the Compliance and Risk Control Department of the El Corte Inglés Group, any reports relating to actions or conduct contrary to this Policy that involve the Organisation or are in any way connected with it. All such investigations shall be duly documented.

The Chief Compliance Officer shall report directly to the Board of Directors of VECI TRAVEL GROUP, S.L. on the results of such investigations and shall inform the Compliance and Risk Control Department of the El Corte Inglés Group of any matters deemed relevant to the Group.

9. Consequences of Non-Compliance

Where a breach of the internal ethical and business regulations of the VIAJES EL CORTE INGLÉS GROUP, or of any applicable legislation, by any Member of the Organisation is

detected, the Chief Compliance Officer shall act immediately, investigating the facts and determining the actions to be taken, including, where appropriate, the referral of the conclusions to the Human Resources Department for the adoption of any disciplinary measures against Members of the Organisation, as well as contractual measures, including, where applicable, the termination of business relationships with Business Partners or Third Parties, within the framework established by applicable law and the relevant contractual provisions.

Such measures shall not only apply to the persons whose conduct has caused the risk or damage, but also to any employee who has failed to follow the procedures established by the VIAJES EL CORTE INGLÉS GROUP for its prevention and response, which is in itself considered a breach of the ethical values and principles to which the VIAJES EL CORTE INGLÉS GROUP is committed.

The Human Resources Department shall be responsible for applying disciplinary measures in accordance with the system of offences and sanctions provided for in the applicable labour regulations and collective bargaining agreement.

Any measures adopted from a labour perspective shall comply with applicable regulations and shall be proportionate to the seriousness of the facts giving rise to them, and, where appropriate, the legal representatives of the employees shall be informed.

The Chief Compliance Officer shall inform the Board of Directors of the outcome of the investigations and of the measures adopted, including disciplinary measures (in the labour sphere) or contractual measures (in commercial relationships with Third Parties), where such measures are considered proportionate to the risks or damage incurred.

Where the facts may *prima facie* constitute a criminal offence, the Chief Compliance Officer, following the relevant legal analysis carried out by the Legal Advisory Department, shall, where appropriate, immediately report the information received to the Public Prosecutor's Office, without prejudice to the protection of the constitutional rights applicable to the legal entity. Likewise, the Chief Compliance Officer shall immediately inform the Board of Directors, as well as the Compliance and Risk Control Department of the EL CORTE INGLÉS GROUP. The Board of Directors shall be competent to adopt the appropriate decisions regarding such communication, once it has received an adequate report on its content. The VIAJES EL CORTE INGLÉS GROUP shall provide its fullest cooperation with any investigations carried out by Public Authorities, taking into account that the internal investigation conducted is protected by the Company's right of defence and by professional secrecy for its benefit, is confidential in nature and that, accordingly, it shall be the exclusive decision of the Company

whether to provide the results of the investigation or any content generated therein in subsequent judicial or other proceedings, where it deems this appropriate or advisable in the exercise of its right of defence.

10. Control, Monitoring and Supervision

9.1 Control and Monitoring

The Chief Compliance Officer shall be responsible for controlling and continuously monitoring compliance with the provisions of this Policy, in accordance with the procedure established in the Compliance Function Charter and the Regulations of the Compliance Function Bodies.

To this end, the Chief Compliance Officer shall rely on simple and effective performance indicators that also facilitate periodic reporting to the Board of Directors on the operation of the Criminal Compliance Management System.

The Chief Compliance Officer shall also be responsible for promoting actions to ensure the proper dissemination and awareness of this Policy.

9.2 Supervision by Internal Audit

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.

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.

11. Approval, Effective Date and Updating

This Policy shall enter into force on the date of its approval by the Board of Directors of VECI TRAVEL GROUP, S.L.

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 Chief Compliance Officer shall be responsible for assessing any proposed amendments. In addition, where such changes are significant, they shall be submitted for approval to the Board of Directors.

12. Dissemination

Once approved by the Board of Directors of VECI TRAVEL GROUP, S.L., this Policy shall be made available on NEXO for all Members of the Organisation and on the corporate website for all stakeholders of the VIAJES EL CORTE INGLÉS GROUP.

Likewise, the Chief Compliance Officer, in coordination with the Compliance and Risk Control Department, 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"> Align with the changes to the Corporate Regulations of El Corte Inglés. Prioritise the objective of the Compliance System in the criminal field and introduce performance indicators for the model, following the recommendations derived from the Gap Analysis on the Criminal Compliance Management System submitted to the Board of Directors on 21 November 2024. Rename Section 2 on Scope of Application. Include a new Section 3 on Principles. Reorganise and adapt Section 4 and related sections to eliminate the Compliance Committee. Create Section 5 Due Diligence with Third Parties. Create Section 6 Awareness and Statement of Compliance. Adapt Sections 7, 8 and 9 on non-compliance to the changes in the Corporate Regulations of El Corte Inglés to reflect the requirements of Law 2/2023 on Whistleblower Protection. Adapt Section 10 to the provisions of the Corporate Regulations of El Corte 	<ul style="list-style-type: none"> Section 1 Purpose Section 2 Scope of Application Section 3 Principles Section 5 Reporting of Non-Compliance Section 4.1 Compliance Body Section 5 Third-party Due Diligence: Section 6 Awareness and Statement of Compliance Section 7 Reporting of Non-Compliance Section 8 Investigation of Non-Compliance Section 9 Consequences of Non-Compliance Section 10 Control, Monitoring and Supervision Section 12 Dissemination

		<p>Inglés regarding the responsibilities of the Internal Audit Department of the El Corte Inglés Group.</p> <ul style="list-style-type: none">• Include a new Section 12 on Dissemination.	
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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 the VIAJES EL CORTE INGLÉS GROUP.

- **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.
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- **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.