



Crime Prevention Policy

Approved by the Board of Directors of VEI
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 **Annex 1**.

1. Purpose of the Crime Prevention Policy

This Crime Prevention Policy (or Criminal Compliance Policy, hereinafter, the 'Policy') reflects the decision of the Board of Directors of VECI TRAVEL GROUP, S.L. to align with best practices in Corporate Governance in relation to the development of a Compliance Management System based on criminal law. In this respect, the Policy applies the concepts used by judges and courts in their rulings to assess reasonable limits for its implementation and takes into consideration the criteria set out in Circular 1/2016 of the State Attorney General's Office on the Criminal Liability of Legal Entities, relevant case law, and the standards established in ISO 19600 on Compliance Management Systems and UNE 19601 on Criminal Compliance Management Systems.

This Policy develops the Code of Ethics of the El Corte Inglés Group, to which VECI TRAVEL GROUP, S.L. has adhered, reaffirming its **commitment to promoting conduct that is respectful of both applicable regulations and ethical values, and defining its framework of compliance principles in criminal matters** across all subsidiaries of the Viajes El Corte Inglés Group.

Furthermore, it is aligned with the culture of integrity and respect for the rules of the El Corte Inglés Group, and takes into account not only the interests and strategic objectives of the Organisation, but also the expectations of its stakeholders. Accordingly, it reflects the Organisation's **determination not to tolerate any conduct that may constitute a criminal offence**. For this reason, this Policy requires the strongest commitment from the Board of Directors and Senior Management, as well as from all other Members of the Organisation, to comply with its provisions.

Based on this commitment to compliance, this Policy establishes the standards of conduct expected of the persons subject to this document, requires their commitment thereto, describes the measures adopted to supervise compliance with such standards and sets out the consequences in the event of non-compliance.

The purpose of this Policy is to establish general principles to promote, among all Members of the Organisation, a culture of Ethics, Compliance and respect for the Law, thereby preventing any Member of the Organisation from engaging, in the performance of their professional activities, in conduct that may constitute a criminal offence.

Criminal offences include intentional or negligent acts or omissions punishable by law. Accordingly, it is the obligation of each individual to be duly informed of applicable laws, as ignorance of the law does not exempt anyone from compliance.

2. Scope of Application

2.1. Entities and Persons Covered

This Policy is mandatory and applies to all companies of the VIAJES EL CORTE INGLÉS Group included within the Criminal Control Perimeter of VECCI TRAVEL GROUP, S.L.

As legal entities may be held liable not only for acts or omissions occurring in Spain, but also for those taking place in other countries where certain conditions are met, it is essential to remain alert to potentially criminal conduct occurring abroad.

All Members of the Organisation shall comply with the provisions of this Policy, regardless of their position or the territory from which they operate. This Policy shall also apply to Business Partners when carrying out their activities within the Group, in compliance with the due diligence processes 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 Organisation or Business Partners.

This commitment shall be formalised as set out in Section 7, 'Awareness and Statement of Compliance', of this Policy.

2.2. Activities Covered

This Policy applies to all activities and businesses carried out by the Viajes El Corte Inglés Group.

The Criminal Risks to which the Viajes El Corte Inglés Group is exposed as a result of these activities and businesses are set out in the Criminal Risk Map of the Viajes El Corte Inglés Group. This document analyses and assesses the different criminal offences for which, in accordance with Article 31 bis of the Spanish Criminal Code, legal entities may incur criminal liability in Spain. These criminal offences arise from crimes¹ committed in their name or on

¹ The Spanish Criminal Code provides for the criminal liability of legal entities for the commission of a closed list of offences (*numerus clausus*), which shall be described in subsequent sections of this Policy, without prejudice to the personal criminal liability that Members of the Organisation or Business Partners who have committed the offence, or who have cooperated in or participated in it, may incur.

their behalf, and for their direct or indirect benefit, (i) by their legal representatives and *de jure* or *de facto* directors, or (ii) by persons subject to their authority, where, in the latter case, the commission of the offence is the result of a lack of due control, taking into account the specific circumstances of the case.

Given the exposure of the Viajes El Corte Inglés Group to the commission of offences attributable to the legal entity, the activities and context in which the Organisation operates shall be evaluated in order to (i) assess the inherent risk that conduct classified as a criminal offence may occur, (ii) define the associated controls and action plans that may mitigate such risk, and (iii) determine the underlying residual risk once the controls and action plans have been implemented.

3. Principles of Compliance Underpinning the Crime Prevention Policy

The principles underpinning the Crime Prevention Policy are as follows:

1. **Respect for the law:** Ensure that all company activities and operations are carried out in compliance with applicable laws, regulations and standards.
 2. **Integrity:** Act with honesty and consistency in all interactions and decisions, maintaining the highest ethical standards.
 3. **Transparency:** Ensure clear and open communication, both internally and externally, providing accurate and complete information on the Organisation's operations and practices.
 4. **Responsibility:** Assume responsibility for actions undertaken and decisions taken, ensuring compliance with all applicable regulations.
 5. **Confidentiality:** Protect confidential and sensitive information, ensuring their appropriate use and preventing unauthorised disclosure.
 6. **Prevention:** Adopt proactive measures to identify and mitigate risks, avoiding conduct that may result in regulatory breaches or harm to the Organisation.
 7. **Duty to Report Non-Compliance:** Where any breach of this Policy is detected, or where there are doubts as to whether any observed practice may constitute conduct contrary to these rules, all Members of the Organisation are required to immediately contact the Compliance and Risk Control Department of El Corte Inglés through the Ethics Channel, using any of the communication methods indicated in Section 9, 'Reporting Non-Compliance', of this document.
 8. **Continuous Improvement:** Establish ongoing evaluation and review processes to ensure the adaptation and continuous improvement of the System.
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The Viajes El Corte Inglés Group does not permit, authorise or tolerate, under any circumstances, that its Members commit criminal acts or omissions, participate in unlawful actions or operations, or seek to obtain any personal benefit or to favour any interest of the Organisation.

In order to promote integrity and responsibility in the performance of their duties, the Viajes El Corte Inglés Group has established in its Code of Ethics a commitment to inform, raise awareness and provide training on strict compliance with applicable legal regulations and the Organisation's internal standards, through the internal communication channels made available for this purpose.

4. 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 Organisation 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 Organisation or Business Partners.

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

5. Assessment of Criminal Risks

It should be noted that actions carried out in the name or on behalf of the Viajes El Corte Inglés Group or in the exercise of corporate activities may give rise, in addition to the criminal liability of the individual concerned, to the criminal liability of the companies of the VIAJES EL CORTE INGLÉS Group as legal entities.

The Spanish Criminal Code provides for the criminal liability of legal entities for the commission of a series of offences expressly defined in Article 31 bis of the Spanish Criminal Code, or for the imposition on the legal entity of any of the ancillary consequences arising from the provisions of Article 129 of the Spanish Criminal Code.

These criminal offences refer to crimes committed in the name or on behalf of the legal entity and for its direct or indirect benefit:

- i) by its legal representatives and *de jure* or *de facto* directors; or

- ii) by persons subject to their authority, where, in this latter case, the commission of the offence results from a lack of due control, taking into account the specific circumstances of the case.

The Organisation must identify and assess the Criminal Risks to which it is exposed as a result of the activities it carries out. This assessment must reflect both the evaluation of inherent risks and residual risks, after taking into account the controls and other measures implemented to mitigate such inherent risks.

All of this must be represented in a Criminal Risk Map, which must be submitted to the Board of Directors for its information and, where appropriate, approval. This Criminal Risk Map shall be updated at least annually and, in any case, as a result of supervening circumstances, due to the development of new activities by the Group or the emergence of new risks arising from changes in the legislative environment affecting the Organisation.

In this regard, the Organisation has identified the potential Criminal Risks in the different activities and businesses it carries out, validating with the heads of the respective areas the scenarios or actions that may give rise to legal and regulatory breaches. Once these inherent risks have been identified, they have been assessed and prioritised. Subsequently, the controls and measures implemented to mitigate such risks have been analysed and evaluated, resulting in their reassessment as residual risks. Finally, all the controls implemented in relation to the Criminal Risks they mitigate are set out in a Risk and Control Matrix, which is updated at least annually to reflect, where appropriate, any new risks (emerging risks), new controls or mitigation measures implemented during the year and, as a result of all of the above, the reassessment of inherent and residual risks. In the preparation of the Criminal Risk Map, a methodology consistent with that used in the El Corte Inglés Group has been applied.

6. Organisational Measures

6.1. Criminal Compliance Body

6.1.1. Composition

The Viajes El Corte Inglés Group has a single-person Criminal Compliance Body entrusted with crime prevention functions and responsible for ensuring the effectiveness of this Policy through the implementation of the various measures provided for in the Criminal Compliance Management System that supports it. This single-person body is embodied by the Chief Compliance Officer of the Viajes El Corte Inglés Group.

In addition, the Chief Compliance Officer of the Viajes El Corte Inglés Group may be assisted by the Compliance Representatives appointed in the entities forming part of the Criminal Control Perimeter of VECI TRAVEL GROUP, S.L.

The communication channels between the Chief Compliance Officer of the Viajes El Corte Inglés Group and the Criminal Compliance Representatives of the entities forming part of the Criminal Control Perimeter of the Viajes El Corte Inglés Group, as well as their main responsibilities, are detailed in the Compliance Programme.

The Board of Directors has appointed the Chief Compliance Officer of the Viajes El Corte Inglés Group, granting them autonomous powers of initiative and control, as well as the highest possible level of independence to carry out their duties, so that they remain free from any business-related constraints that could impair their performance.

Accordingly, the Chief Compliance Officer of the Viajes El Corte Inglés Group enjoys the full support of the Board of Directors, to whom they have direct access, and is entrusted with responsibility for supervising the operation and observance of the Criminal Compliance Management System. In this regard, the Chief Compliance Officer of the Viajes El Corte Inglés Group is authorised to freely access the information and documentation of the Organisation necessary for the proper and effective performance of their duties, as well as to request the cooperation of the Members of the Organisation required for the fulfilment of their responsibilities. Members of the Organisation are obliged to promptly provide the documents and information requested, always in accordance with the principles of proportionality and appropriateness. The Compliance Officer of the Viajes El Corte Inglés Group performs their duties autonomously, without the need for specific mandates, pursuant to the provisions of this Policy and the Compliance Programme.

The independence of the Chief Compliance Officer of the Viajes El Corte Inglés Group guarantees neutrality in decision-making. This independence is supported by their functional relationship and direct access to the Board of Directors and, therefore, by their autonomy in the exercise of their functions with respect to the rest of the organisational units responsible for operational management. In addition, the performance evaluation of the Chief Compliance Officer of the Viajes El Corte Inglés Group ultimately corresponds to the Board of Directors.

6.1.2 Main responsibilities

The main responsibilities of the Chief Compliance Officer of the Viajes El Corte Inglés Group in the area of crime prevention are grouped as follows:

1. **Promote and supervise the implementation of the Organisation's Criminal Compliance Management System**, ensuring that all persons covered by this document have access to the Organisation's regulations for the prevention of crimes.
2. **Identify Criminal Compliance obligations**, keep them up to date and disseminate them among the Members of the Organisation.

3. **Identify and manage Criminal 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 subject to this document to have the knowledge and skills necessary to assume their responsibilities in the prevention, detection and management of Criminal Risks.
5. Advise not only the Board of Directors and Senior Management, but also any other Member of the Organisation who may require the assistance of the Chief Compliance Officer of the Viajes El Corte Inglés Group, and report to the Board of Directors and Senior Management on the results derived from the implementation of the Criminal Compliance Management System and on its performance.
6. Collaborate with the Compliance and Risk Control and Management Department of the El Corte Inglés Group in the handling of communications received through the **El Corte Inglés Group Ethics Channel** as a tool for collecting information on potentially unlawful conduct or irregularities, and in the processing of declarations of conflicts of interest received.
7. Properly identify, and in an appropriate format, both the information relating to the pillars of the Criminal Compliance Management System and the documentation derived from its implementation, ensuring that it is available (except for information which, due to confidentiality reasons, is accessible only to certain areas of the Organisation), is suitable for use and allows traceability of access and preservation of legibility.
8. **Measure the performance of the Criminal Compliance Management System** of the Viajes El Corte Inglés Group through indicators, ensuring that all its elements operate correctly, and promoting its review and **continuous improvement**.
9. 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 this regard.

6.2. Obligations of the Members of the Organisation

Since compliance with the law and the proper implementation of the Criminal Compliance Management System concern all Members of the Organisation, all of them,

regardless of the position they hold within the Organisation, are expected to: (i) ensure compliance with the provisions of this Policy, observing at all times ethical conduct opposed to the commission of criminal offences; and (ii) promptly follow any instructions issued by the Compliance and Risk Control Department of the Group in the exercise of the functions described above.

6.3. Board of Directors and Senior Management

The Board of Directors and Senior Management not only support the Chief Compliance Officer of the Viajes El Corte Inglés Group in the performance of their duties, but also actively promote a culture of Compliance within the Organisation, ensuring that the Chief Compliance Officer of the Viajes El Corte Inglés Group has adequate resources to effectively implement the Criminal Compliance Management System and encouraging the use of the procedures and channels established for reporting potentially criminal conduct that may affect the Organisation and its activities, among other matters.

The leadership exercised within VECI TRAVEL GROUP, S.L. and the Viajes El Corte Inglés Group by their Board of Directors and Senior Management entails, in addition to the obligations applicable to all Members of the Organisation, the specific obligations set out below.

(i) Obligations of the Board of Directors

The Board of Directors is responsible for formally approving this Policy — as well as any updates it may require — and for promoting the adoption and implementation of a Criminal Compliance Management System appropriate for the Viajes El Corte Inglés Group, suitable for preventing, detecting and managing the Criminal Risks that threaten the Viajes El Corte Inglés Group.

In accordance with the Spanish Criminal Code, VECI TRAVEL GROUP, S.L. has assigned the supervision of the operation and compliance of the implemented prevention model to a body of the legal entity with autonomous powers of initiative and control, namely the Chief Compliance Officer of the Viajes El Corte Inglés Group. In addition, it provides the Chief Compliance Officer of the Viajes El Corte Inglés Group with adequate and sufficient financial, material and human resources to enable the effective performance of their duties.

As the body responsible for the adoption of the System, it periodically evaluates its effectiveness and promotes its modification, where necessary, when it becomes aware, through any channel, of serious breaches or when significant changes occur in the circumstances affecting the Viajes El Corte Inglés Group, the assessment of its Criminal Risks or the established Criminal Compliance objectives.

Likewise, under the terms provided for in the Criminal Compliance Management System regarding Criminal Compliance reports, the Board of Directors receives, reviews and signs the reports submitted by the Chief Compliance Officer of the Viajes El Corte Inglés Group, adopting any actions recommended by them or promoting those it deems most appropriate for the proper management of identified Criminal Risks.

The Board of Directors also ensures that decision-making processes are established within VECI TRAVEL GROUP, S.L. and the Viajes El Corte Inglés Group to reduce the likelihood of the materialisation of the most significant Criminal Risks and, in any case, those assessed above the “low” rating in the Criminal Compliance Risk Map. The Board of Directors must review, at the proposal of the Chief Compliance Officer of the Viajes El Corte Inglés Group or Senior Management, the procedures and controls associated with the delegation of decision-making authority in areas where Criminal Risk exists, where such delegations exist.

(ii) Obligations of Senior Management

Senior Management of the Viajes El Corte Inglés Group collaborates with the Board of Directors in the performance of its responsibilities, particularly with regard to conveying the Organisation’s culture of Compliance and its **zero-tolerance stance towards conduct that may lead to the commission of criminal offences.**

Due to its proximity to the strategic and operational objectives of the Viajes El Corte Inglés Group and its hierarchical position, Senior Management is responsible for:

- **Leading and supporting** all Members of the Organisation in the fulfilment of their Compliance obligations.
- Ensuring that all of them integrate such obligations into the performance of their daily activities.
- Ensuring, in the exercise of its executive functions, that the requirements arising from the System are incorporated into all processes and procedures of the Viajes El Corte Inglés Group, guiding and supporting its Members in the observance of the Requirements and the effectiveness of the System.
- Ensuring the availability of adequate and sufficient resources for the effective implementation of the System, internally communicating the importance of such implementation in a manner consistent with this Policy.

Senior Management must also identify and act to manage potential or actual conflicts of interest where responsibility or decision-making authority is delegated in areas where Criminal Risk exists.

Senior Management participates in the processes of identification, analysis and assessment of Criminal Risks when required and fosters the use, by the Members of the Organisation, of the channels made available to them and to Third Parties for reporting potentially criminal conduct that may affect the Organisation and its activities.

With regard to reports made by Members of the Organisation concerning activities related to Criminal Risks, Senior Management ensures the absence of retaliation, discrimination or sanctions for reports made in good faith or for actions aimed at avoiding participation in criminal conduct.

6.4. Management Committee:

It is the collegial decision-making body that supports the General Management of VECCI TRAVEL GROUP, S.L. in the performance of the duties entrusted to it by delegation of the Board of Directors.

6.5. Operational Directors

Directors of the companies, Areas and Departments, as the first line of defence, are responsible for complying with the policies and procedures established by the Viajes El Corte Inglés Group, as well as for acting in an ethical and responsible manner.

In this regard, they are responsible for maintaining an effective control environment, ensuring that their areas of responsibility operate in accordance with applicable legislation and other applicable internal regulations, as well as for overseeing that the implementation of controls is optimal, supervising that the different areas execute them correctly.

Likewise, the participation and coordination of Operational Directors in relation to the System are defined in the Regulations of the Compliance Function Bodies.

Through procedures for instruction, delegation and supervision, Operational Directors shall ensure that these objectives and responsibilities are shared throughout the entire management structure in their respective areas of activity.

6.6. All Members of the Viajes El Corte Inglés Group

All Members of the Viajes El Corte Inglés Group are responsible for understanding, observing and applying the provisions of this Policy, cooperating with the Chief Compliance Officer of the Viajes El Corte Inglés Group, the Board of Directors, Senior Management and Operational Directors where necessary, and particularly observing the conduct expected of them.

They are also expected to immediately report to the Chief Compliance Officer of the Viajes El Corte Inglés Group any action aimed at preventing or remedying the possible commission of a crime or potential crime of which they become aware.

In addition, all Members of the Organisation are expected to adhere to the principles and standards set out in this Policy, attend the Criminal Compliance training sessions determined in accordance with their role or position, and promptly provide the information and documentation requested by the Chief Compliance Officer of the Viajes El Corte Inglés Group.

7. Awareness and Statement of Compliance

Compliance with ethical rules and standards represents both a corporate commitment and a strategic objective for the Organisation. Therefore, all Members of the Organisation are expected to be familiar with and adhere to the contents of this Policy. Likewise, all Business Partners are expected to act in accordance with its principles.

This commitment shall be formalised through:

- i. Statements of compliance with the principles set out herein by Members of the Organisation, through their adherence to **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 those investee companies in which VECI TRAVEL GROUP, S.L. does not exercise effective control in accordance with Article 42 of the Spanish Commercial Code, its representatives on the governing bodies of such entities shall promote formal adherence to this Policy by decision of their governing or management bodies and, where this is not possible, shall promote the alignment of the investee companies' policies with the principles and values governing this Policy.

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.

In addition, such adhesions and their renewals shall be notified, once formalised, to the Compliance and Risk Control Department of the El Corte Inglés Group by the Chief Compliance Officer of the Viajes El Corte Inglés Group.

8. Reporting of Non-Compliance

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.

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.

9. 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.

10. 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 of the Viajes El Corte Inglés Group shall immediately inform the Board of Directors and 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.

11. Control, Monitoring and Supervision

11.1 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.

11.2 Supervision by Internal Audit

The Internal Audit Function of the El Corte Inglés Group shall review the Criminal Compliance Management System of the Viajes El Corte Inglés Group 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.

12. 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.

13. Dissemination

Once approved by the Board of Directors of El Corte Inglés, S.A., this Policy shall be made available on NEXO for all Members of the Organisation and on the corporate website for all ECI Group stakeholders.

Likewise, the Compliance and Risk Control Department shall promote the necessary actions to ensure its proper dissemination and awareness.

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"> Adapt to the changes approved in the Corporate Regulations of the El Corte Inglés Group on 30/Oct/2024 and 29/Oct/2025. Reference to the introduction of performance indicators of the model and to the methodology for the assessment of Criminal Risks, following the recommendations derived from the Gap Analysis on the Criminal Compliance Management System submitted to the Board of Directors on 21 November 2024. Introduce Section 1 on the Purpose of the Policy. Rename Section 2 on the Scope of Application. Develop the Principles of the Policy in Section 3. Introduce Section 4 on Due Diligence with Third Parties. Rename Section 5 from Catalogue of Criminal Risks to Criminal Risk Assessment. Introduce Section 7 on Awareness and Statement of Compliance. Adapt Section 8 Communication of Breaches to the requirements of Law 2/2023 on Whistleblower Protection. Adapt Section 11 to the provisions of the Corporate Regulations of El Corte Inglés regarding the responsibilities of the Internal Audit Department of the ECI Group. Include Dissemination in Section 13. 	<ul style="list-style-type: none"> Section 1 Purpose of the Criminal Compliance Policy Section 2 Scope of Application Section 3 Compliance Principles Section 4 Third-party Due Diligence Section 5 Criminal Risk Assessment Section 7 Awareness and Statement of Compliance Section 8 Reporting of Non-Compliance Section 10 Consequences of Non-Compliance Section 11 Control, Monitoring and Supervision Section 13 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 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.
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- **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
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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.
- **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.
- **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.
- **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.
- **Operational Management:** Members of the Organisation who, as the first line of defence, are responsible for complying with the policies and procedures established by the Organisation.
- **Compliance Function Charter:** A document defining the foundations of the Compliance Function of VECI TRAVEL GROUP, S.L.
- **VECI TRAVEL GROUP, S.L. / Group / Organisation:** The group of companies that make up the VIAJES EL CORTE INGLÉS GROUP.
- **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.
- **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-conformity:** Failure to comply with a requirement.
- **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 stakeholder groups considered are listed in Annex II to the Compliance Programme.
- **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.

- **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.
- **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.
- **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.
- **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 mandatory and predefined 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.
- **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 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.
- **Criminal Compliance Management System:** A system for the prevention of offences, the purpose of which is the prevention, detection, management and reporting of Criminal Risks, integrated into business processes and subject to supervision and continuous improvement. It is also referred to as the "System".
- **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.

- **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.
- **Third Party:** Any natural or legal person or independent body external to the Organisation.