



Regulations of the Compliance Function Bodies

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 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**.

Chapter 1. Nature and Purpose

Article 1. Nature and Purpose

1. These Regulations constitute a Policy within the internal regulations of VECI TRAVEL GROUP, S.L. and are intended to be implemented and applied across all entities included within the Criminal Control Perimeter of the VIAJES EL CORTE INGLÉS GROUP.
2. The purpose of these Regulations is to regulate the channels for the development of the Compliance Function through the bodies responsible for its implementation, as provided for in the Compliance Function Charter.
3. The approval, amendment and revocation of these Regulations fall within the authority of the Board of Directors.

Chapter 2. Awareness and Statement of Compliance

Article 2. Awareness and Statement of Compliance

1. Adherence by the entities included within the Criminal Control Perimeter of the Viajes El Corte Inglés Group to these Regulations shall be formalised by acknowledgement by their respective Boards of Directors or, failing that, by notification from the Chief Compliance Officer to the secretaries of such governing bodies.
2. In addition, statements of compliance with the principles set out in these Regulations shall be required from Members of the Organisation, as well as specific clauses to be included in contracts with Business Partners.
3. Such adherence shall be renewed whenever these Regulations are subject to significant modifications.

Chapter 3. Structure and Operation

Article 3. Compliance Function Bodies

For the purpose of achieving the objectives set out in the preceding article, the Compliance Function shall be carried out through the following bodies:

1. The **Board of Directors**, which is responsible for the governance and representation of the Organisation. In relation to the Compliance Function, the Board of Directors is responsible for
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the approval and oversight of the development, management and administration of general policies and strategies, and holds ultimate responsibility for the Criminal Compliance Management System of VECI TRAVEL GROUP, S.L. and the entities included within its Criminal Control Perimeter (hereinafter, the VIAJES EL CORTE INGLÉS GROUP).

2. 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.
3. The **Operational Directors** are responsible for applying and executing the operational business tasks in accordance with the Organisation's internal regulations (policies, procedures, protocols, etc.), always acting in accordance with the principles of ethics and social responsibility.
4. The **Chief Compliance Officer**, who is entrusted with the exercise of the Compliance Function.
5. The **Internal Corporate Development Department** (DCI), a body supporting the Compliance Function in order to ensure the supervision and application of personal data protection regulations. In addition, the **Data Protection Officer** (DPO) is an independent body in the management of its areas of competence, which shall properly coordinate its duties in compliance matters with the Chief Compliance Officer.

Article 4. The Board of Directors

1. Pursuant to its Articles of Association, the Board of Directors is required to assume, on a non-delegable basis, those powers reserved to it by law or by the Articles of Association. This necessarily includes the determination of the Organisation's general policies and strategies.
2. Accordingly, in the exercise of these responsibilities, and with regard to the Compliance Function, the Board of Directors is ultimately responsible for the proper adoption and implementation of the Criminal Compliance Management System of VECI TRAVEL GROUP, S.L. This responsibility entails, in particular, the following:
 - Promoting the adoption and implementation of a Criminal Compliance Management System appropriate to VECI TRAVEL GROUP, S.L., suitable for preventing, detecting and managing criminal risks that may affect the Organisation.
 - Promoting and fostering the Organisation's commitment to the highest ethical and regulatory compliance standards.
 - Exercising due supervision over the development of the Criminal Compliance Management System, as well as over the bodies entrusted with the execution of tasks inherent to its continuous improvement.

- Providing the System, and in particular the bodies responsible for the Compliance Function, with the appropriate financial, human and material resources necessary to achieve the intended objectives.
- Appointing the Chief Compliance Officer as the control body responsible for supervising the operation of the Compliance System.
- Approving and implementing the main corporate policies that define the process for forming the Organisation's will in matters of Compliance and which make up the System. In particular, the Board of Directors is responsible for approving the Compliance Programme, the Crime Prevention Policy (Criminal Compliance Policy), the Compliance Policy, the Compliance Function Charter and these Regulations of the Compliance Function Bodies.

In this way, the Board of Directors demonstrates its commitment to compliance with the law and to the implementation of an appropriate culture of Ethics and Compliance aligned with the principles and values of the El Corte Inglés Group.

- Requesting studies, reports and assessments in relation to the Criminal Compliance Management System, in order to promote its continuous improvement.
- Periodically evaluating its effectiveness and promoting its modification, where appropriate, when it becomes aware, through any channel, of the existence of serious non-compliance, or when significant changes occur in the circumstances affecting the Organisation, the assessment of its criminal risks or its Criminal Compliance objectives.

Article 5. The Management Committee

1. The Management Committee shall be responsible for ensuring that Operational Directors comply with the internal and external regulations applicable to the Group's activities, promoting a culture of Compliance across all areas of the Organisation and ensuring the proper functioning and effectiveness of the Compliance System.

Article 6. The Operational Directors

1. As the first line of defence within the Criminal Compliance Management System, the management of entities, areas and departments is responsible for complying with, and ensuring compliance with, the Organisation's internal regulations, fostering ethical conduct and full corporate and social responsibility within their respective areas of responsibility. Accordingly, Operational Management is responsible for ensuring that the Criminal Compliance Management System is effectively implemented within its scope of responsibility. To this end, Operational Directors shall carry out the following functions:
 - Demonstrating their commitment to the design, development, implementation, maintenance and improvement of the Criminal Compliance Management System, ensuring

its alignment with the strategic objectives, regulatory compliance obligations and values of the El Corte Inglés Group. In this regard, Operational Directors shall ensure consistency between operational objectives and compliance obligations, and shall guarantee that the requirements arising from the System are incorporated into existing policies and procedures.

- Allocating adequate and sufficient resources within each area of the Organisation for the development, implementation, maintenance and continuous improvement of the Criminal Compliance Management System within their respective areas of responsibility.
 - Clearly conveying to the Members of the Organisation the obligation to comply with the Criminal Compliance Management System
2. Directors shall be responsible for complying with, and ensuring compliance with, the obligations arising from the Criminal Compliance Management System. Through instruction, delegation and supervision procedures, Operational Directors shall involve the entire organisational structure in these objectives and responsibilities within their respective areas of activity.
- In this regard, Operational Directors and all structures reporting thereto shall be responsible for directing and supporting all Members of the Organisation and the roles assumed within it, in order to achieve effective compliance with the System and to demonstrate the commitment and leadership assumed by management in the prevention of legal non-compliance.
 - Operational Directors shall promote the use of the Ethics Channel for reporting potentially criminal conduct that may affect VECI TRAVEL GROUP, S.L. in the course of its activities. Likewise, Operational Directors shall ensure that no Member of the Organisation is subject to any form of retaliation for reporting, in good faith, any non-compliance of which they are aware or suspect, or for refusing to participate in any unlawful conduct, even where such refusal may result in a loss of business for the Viajes El Corte Inglés Group.
 - Operational Directors shall continuously review and assess the results of the Criminal Compliance Management System.

Article 7. The Chief Compliance Officer.

1. In accordance with the provisions of the Compliance Function Charter, the Chief Compliance Officer is entrusted with the exercise of the Compliance Function as the person responsible therefor. To this end, and without prejudice to the other powers provided for in these Regulations and in the aforementioned Charter, the Chief Compliance Officer is the single-person body responsible for supervising the operation and compliance of the Criminal Compliance Management System.
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2. The Chief Compliance Officer shall be appointed by the Board of Directors. The candidate shall meet the technical, professional and personal requirements established in the Compliance Function Charter.

As a general rule, the Chief Compliance Officer shall have the following key attributes:

- Autonomy and independence, as fundamental attributes to ensure that the Chief Compliance Officer is never directly involved in the activities constituting the corporate purpose of VECI TRAVEL GROUP, S.L.
 - Adequate preparation, ensuring the appropriate professional experience required to perform the core duties inherent to the position.
 - Honesty and integrity in the performance of their duties.
 - Continuity of action in the performance of communication and influence activities, ensuring maximum compliance with both internal and external regulations.
3. The Chief Compliance Officer shall report directly to the Board of Directors, in order to enable it to assume its responsibility for overseeing the operation of the Criminal Compliance Management System.
 4. The Chief Compliance Officer shall be responsible for the proper organisation and effective implementation of the Compliance Function and shall ensure the execution and supervision of the policies, procedures and action plans that develop it.
 5. To this end, the Board of Directors shall ensure that the Compliance Function is provided with the material and human resources necessary and sufficient for the exercise of its responsibilities, allocating a specific annual budget for this purpose.
 6. The Chief Compliance Officer shall have the authority and legitimacy within the Organisation to request any information and documentation supporting and evidencing compliance with corporate policies, procedures and implemented controls, as well as to access all documentation necessary to supervise and verify that the Compliance Function is performed effectively and efficiently.
 7. The Chief Compliance Officer may also seek external advice, within the allocated budget, for the proper performance of the Compliance Function.

Article 8. Development of the Compliance Function

1. The Chief Compliance Officer shall establish the structure of the Compliance Function, in accordance with the principles of independence, effectiveness and proportionality.
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2. For the performance of their duties, the Chief Compliance Officer may set up temporary or permanent Working Groups or Units, involving professionals from the Organisation's departments or operational areas, in order to ensure collaboration, knowledge sharing and the effectiveness of the processes designed or implemented.
3. The Compliance Function may only be carried out effectively and efficiently if it benefits from the necessary and direct cooperation of the operational areas.
4. The management bodies and officers of the entities included within the Criminal Control Perimeter, as well as the operational areas and departments of the Viajes El Corte Inglés Group, shall provide full cooperation to the Chief Compliance Officer. They shall rigorously implement the monitoring and follow-up systems designed to achieve the established objectives, facilitate investigation or verification processes, provide access to documentation and implemented working systems when required, and enable the collaboration of the professionals under their responsibility who are called upon to participate in the Working Groups or Units that may be established.
5. The Chief Compliance Officer may appoint Representatives in the companies of the VIAJES EL CORTE INGLÉS GROUP that they deem appropriate for the proper performance of their duties.
6. The Chief Compliance Officer shall implement an organisational and management system that enables the achievement of the objectives established for the Compliance Function by the Board of Directors and by the Compliance Function Charter.

Article 9. Compliance Management System or Criminal Compliance Management System

1. The Chief Compliance Officer shall submit to the Board of Directors the plans, procedures and policies constituting the Compliance Management System and, in particular, the Criminal Compliance Management System. Likewise, prior to the start of each financial year, the Chief Compliance Officer shall submit an Annual Activity Plan and, at the end thereof, an Annual Compliance Report.
 2. The Compliance Management System, in particular the Criminal Compliance Management System, shall ensure:
 - i. The strengthening of the regulatory compliance culture within the Organisation, promoting and motivating individuals to assume responsibility for ethical and effective conduct in the performance of any task or position, and disseminating the principle of "zero tolerance" towards any unlawful, infringing or fraudulent act, particularly those involving breaches of regulations and/or the commission of criminal offences.
 - ii. The effective identification of activities that may give rise to non-compliance with applicable legislation, implementing regulations, internal rules and voluntarily assumed commitments affecting the Organisation's activities.
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- iii. The implementation of policies and procedures for the control and management of regulatory compliance risks, enabling the Organisation's commitment to compliance to be understood and encouraging responsible behaviour, thereby preventing the materialisation of Compliance Risks.
- iv. Awareness of, and appropriate response to, foreseeable regulatory changes affecting the Organisation, as well as the jurisprudential criteria issued in their application, assessing their impact and advising the governing bodies accordingly.
- v. The promotion, dissemination, knowledge and compliance with the Code of Ethics and the Ethics Channel, assessing their effectiveness and ensuring the proper handling of complaints or claims submitted.
- vi. The promotion, updating and implementation of the Organisation's Compliance Policies in matters such as: Criminal Liability; Data Protection; Prevention of Money Laundering and the Financing of Terrorism; Prevention of Corruption and Fraud; Prevention of Discrimination and Harassment; Real Estate and Urban Planning Compliance; Consumer Affairs; Competition; Public Health; Environment; Sustainability, among others, monitoring their operation and effectiveness.
- vii. Reporting by the Chief Compliance Officer to the Board of Directors, either individually and/or jointly with the Data Protection Officer (DPO), in relation to the promotion, updating and implementation of the Organisation's Compliance Policies in matters concerning Data Protection.
- viii. Procedures to ensure its continuous updating and the application of continuous improvement principles.
- ix. Procedures for the implementation of corrective actions to ensure the modification of behaviours that may give rise to regulatory non-compliance or that fail to comply with the controls established to prevent such non-compliance.
- x. The issuance of periodic reports reflecting the operation of the System, ad hoc reports in the event of incidents, and the Annual Compliance Report.

Article 10. Accountability of the Chief Compliance Officer

The Chief Compliance Officer shall be accountable for the performance of their professional duties to the Board of Directors, which may request information on any aspect of their performance and, where appropriate, proceed with their removal.

Article 11. Internal Corporate Development Department:

1. The Internal Corporate Development Department (DCI) is a body supporting the Compliance Function in order to ensure the supervision and application of personal data protection regulations.

Chapter 4. Duties of the Chief Compliance Officer

Article 12. Specific Responsibilities of the Chief Compliance Officer

1. Responsibilities relating to Regulatory Compliance:
 - a) Promote and supervise the implementation of the Criminal Compliance Management System of VECI TRAVEL GROUP, S.L., ensuring that all Members of the Organisation have access to the internal regulations adopted for the prevention of criminal offences.
 - b) Identify Criminal Compliance obligations, keep them up to date and disseminate them among the Members of the Organisation.
 - c) Identify and manage Criminal Risks, analysing and assessing them in order to prioritise actions and allocate resources for their prevention, detection and management.
 - d) Promote awareness-raising and training programmes enabling Members of the Organisation to acquire the knowledge and skills necessary to assume their responsibilities in the prevention, detection and management of Criminal Risks.
 - e) Advise the Board of Directors, Senior Management and any other Member of the Organisation requiring such support, and report to the Board of Directors and Senior Management on the results arising from the implementation and performance of the Criminal Compliance Management System.
 - f) Support 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.
 - g) Properly identify, in an appropriate format, both the information relating to the pillars of the Criminal Compliance Management System and the documentation arising from its implementation, ensuring that such information is available (except where confidentiality restricts access to certain areas), fit for purpose, traceable in terms of access and preserved in a legible manner.
 - h) Measure the performance of the Criminal Compliance Management System through indicators, ensuring that all its elements operate correctly and promoting its review and continuous improvement.
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2. Responsibilities relating to the Code of Ethics:

In this regard, the Chief Compliance Officer shall have the following main responsibilities:

- a) Promote the dissemination, general awareness and compliance with the Code of Ethics. Propose appropriate training and communication actions for this purpose, requesting the cooperation and coordination of the relevant interlocutors in the different departments and entities within the Criminal Control Perimeter of VECI TRAVEL GROUP, S.L. Ensure that dissemination and communication actions across the Organisation follow homogeneous criteria, taking into account the specific characteristics applicable to each division and/or company.
- b) Interpret the provisions of the Code of Ethics and resolve queries or doubts relating to its content, application or compliance, particularly in relation to disciplinary measures, with conclusions that shall be binding.
- c) Annually assess the level of compliance with the Code of Ethics, issuing the corresponding report and periodically informing the Board of Directors.
- d) Promote the approval of the rules necessary for the development of the Code of Ethics and for the prevention of breaches and non-compliance.
- e) Promote the implementation of processes, procedures, controls and action protocols aimed at ensuring compliance with the Code of Ethics.

3. Responsibilities relating to the Internal Reporting System:

Within the El Corte Inglés Group, responsibility for the Internal Reporting System lies with the Compliance and Risk Control Department. The Internal Reporting System is the preferred channel for reporting potential irregularities and non-compliance, particularly criminal offences, and includes the Ethics Channel—understood as the digital channel for receiving information—as well as the System Manager, the applicable Policy and the Procedure for managing communications.

The Chief Compliance Officer shall have the following main responsibilities:

- a) Receive communications submitted through the Ethics Channel by Members of the Organisation, Business Partners and Third Parties.
 - b) Process investigation files, promoting verification procedures in relation to the communications received and issuing the corresponding decisions on the cases handled.
 - c) Safeguard the identity of the reporting person, ensuring confidentiality throughout the entire process.
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- d) Inform the Board of Directors of the number, type and outcome of the communications received and, where applicable, of the measures or corrective actions adopted.
- e) Perform these responsibilities in accordance with the provisions of the Code of Ethics and the principles of conduct set out in the applicable regulations.
- f) Implement the dissemination and training measures necessary to ensure that all employees are aware of the Ethics Channel.

The Chief Compliance Officer of the VIAJES EL CORTE INGLÉS GROUP shall collaborate with the person responsible for the Internal Reporting System in the handling of communications received, in accordance with the provisions of the Corporate Procedure for the processing of communications received through the Ethics Channel.

4. Responsibilities relating to the Crime Prevention Policy (Criminal Compliance Policy) and the Corporate Anti-Corruption and Anti-Fraud Policy:

In this regard, the Chief Compliance Officer shall have the following main competences:

- a) Monitor the operation, effectiveness and compliance with the Crime Prevention Policy (Criminal Compliance Policy) and the Corporate Anti-Corruption and Anti-Fraud Policy, and control the implementation, development and compliance of the Criminal Compliance Management System.
 - b) Promote preventive behaviour based on the principle of 'zero tolerance' towards unlawful acts and fraud, and the application of ethical principles and responsible conduct by all Members of the Organisation.
 - c) Promote and encourage the design and implementation of training programmes—both face-to-face and online—for Members of the Organisation in relation to the obligations arising from the Code of Ethics, the Crime Prevention Policy (Criminal Compliance Policy) of the Viajes El Corte Inglés Group and the Corporate Anti-Corruption and Anti-Fraud Policy, in particular with regard to corruption and the criminal liability of legal persons, as well as other applicable legal and regulatory obligations affecting the activities of the Viajes El Corte Inglés Group.
 - d) Periodically assess the level of compliance with and effectiveness of the Crime Prevention Policy (Criminal Compliance Policy) of the Viajes El Corte Inglés Group, the Corporate Anti-Corruption and Anti-Fraud Policy, as well as the Compliance Programme and the List of the Main Criminal Compliance Controls.
 - e) Respond to incidents or non-compliance with the Crime Prevention Policy (Criminal Compliance Policy) of the Viajes El Corte Inglés Group and the
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Corporate Anti-Corruption and Anti-Fraud Policy, as well as to breaches of procedures or omissions of controls implemented to ensure their effectiveness, in order to appropriately correct the action or omission and ensure compliance with the established criteria.

For these purposes, the Chief Compliance Officer shall be responsible for the application of the Policies and for ensuring the implementation, updating and monitoring of the protocols deemed necessary or appropriate for crime prevention, including, in particular, the following:

- a) Code of Ethics, establishing the general framework for conduct and behaviour of employees, middle management and directors, as well as the relationships to be maintained with Members of the Organisation, Third Parties and Stakeholders.
- b) Ethics Channel or reporting channel.
- c) Corporate Procedure for the Management of Conflicts of Interest.
- d) Crime Prevention Policy (Criminal Compliance Policy).
- e) Specific procedures or protocols for the areas or entities within the Criminal Control Perimeter, where required.

Within the scope of the areas, departments or entities forming part of the Criminal Control Perimeter of VECI TRAVEL GROUP, S.L., the Chief Compliance Officer shall establish a framework for coordination, collaboration and information-sharing with their respective Compliance Representatives, aimed at promoting the highest ethical standards in crime prevention, investigation processes, supervision and control activities, coordination of risk analysis and the promotion of training programmes.

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 a regular and systematic basis on their performance in accordance with the provisions of the Compliance Programme. For this purpose, the Chief Compliance Officer shall issue the relevant guidelines to the Compliance Representatives in order to align all Compliance Management Systems within the Group.

Chapter 5. Commitments and Duties within the Compliance Function

Article 13. Commitments and Duties

1. The Chief Compliance Officer, the Compliance Representatives and the persons responsible for the areas, departments or entities within the Criminal Control Perimeter who are requested to collaborate in the development of the Compliance Function must act with independence of judgement and action, prioritising the achievement of objectives and the effectiveness of their activities.
2. They shall perform their duties with the utmost diligence and professional competence.
3. They shall maintain the confidentiality of their deliberations and decisions and generally refrain from disclosing any information, data, reports or background details to which they have access in the course of their duties, as well as from using such information for personal benefit or the benefit of third parties, without prejudice to the obligations of transparency and information provided for in the corporate governance system and in the Law. The obligation of confidentiality shall remain in force even after they have ceased to hold office or have concluded their collaboration.
4. They shall be required to be familiar with and comply with these Regulations.

Article 14. Conflicts of Interest

1. The Chief Compliance Officer and any persons who collaborate on a permanent or temporary basis in the tasks involved in implementing the Criminal Compliance Management System shall abstain from acting whenever they become aware that they are involved in a potential conflict of interest and shall immediately report such circumstance.
2. In the case of the Chief Compliance Officer, the conflict of interest shall be reported to the Board of Directors, through its Chair or, where this is not possible, through its Secretary.

Chapter 6. Interpretation**Article 15. Interpretation**

1. These Regulations shall be interpreted in accordance with applicable law and with the Compliance Function Charter.
2. Any doubts or discrepancies regarding the interpretation of these Regulations shall be resolved by the Chief Compliance Officer. Where this is not possible, the matter shall be referred to the Board of Directors for approval.

Chapter 7. Control, Monitoring and Supervision**Article 16. Control and Monitoring**

1. The Chief Compliance Officer shall be responsible for controlling and continuously monitoring compliance therewith, in accordance with the procedure set out therein, as well as with the Compliance Function Charter. The Chief Compliance Officer shall also be responsible for promoting actions to ensure its proper dissemination and awareness.

Article 17. Supervision

1. 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.
2. 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.

Chapter 8. Approval, Effective Date and Updating

Article 18. Approval, Effective Date and Updating

1. These Regulations of the Compliance Function Bodies were 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 date, they are fully in force in all their terms.
3. These Regulations shall be kept up to date over time. To this end, they 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.
4. 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.

Chapter 9. Dissemination

Article 19. Dissemination

1. Once approved by the Board of Directors of VECI TRAVEL GROUP, S.L., these Regulations 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.
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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 their 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 Compliance Representatives • Responsibilities of the Chief Compliance Officer with respect to the Internal Reporting System • Remove references to the Compliance Committee • Remove the specific section on the Internal Corporate Development Department (DCI) • Update the Internal Audit Function • Include the 'Monitoring and Supervision' section • Include the 'Dissemination' section 	<ul style="list-style-type: none"> • Article 2. Awareness and Statement of Compliance • Article 3. Compliance Function Bodies • Article 8. Development of the Compliance Function • Article 11. Internal Corporate Development Department • Article 12. Responsibilities of the Chief Compliance Officer • Chapter 7. 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 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
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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.