GRI CONTENT INDEX
GRI content verification

INDEPENDENT LIMITED ASSURANCE REPORT

To the Shareholders of Industria de Diseño Textil, S.A.,

We have performed the verification, with a scope of limited assurance, of certain non-financial information indicators included in the Annual Report (“the Annual Report”) for the year ended 31 January 2020 (“2019”) of Industria de Diseño Textil, S.A. (“Inditex”) and Subsidiaries (“the Group”).

Our review work was confined solely to the verification of the information for 2019 identified by the symbol in the “GRI content index” section included in the accompanying Annual Report.

Responsibilities of the Directors and of Management

The preparation and content of the Group’s Annual Report are the responsibility of the directors of Inditex. The Annual Report was prepared following the criteria of the comprehensive version of the GRI standards and other criteria described as indicated for each matter in the “GRI content index” section of the aforementioned Annual Report.

These responsibilities also include the design, implementation and maintenance of such internal control as is determined to be necessary to enable the Annual Report to be free from material misstatement, whether due to fraud or error.

The directors and management of Inditex are also responsible for defining, implementing, adapting and maintaining the management systems from which the information necessary for the preparation of the Annual Report is obtained.

Our Independence and Quality Control

We have complied with the independence and other ethical requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants (IESBA), which is based on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Our firm applies International Standard on Quality Control 1 (ISQC 1) and, accordingly, maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Our engagement team consisted of professionals who are experts in reviews of non-financial information and, specifically, in information about economic, social and environmental performance.

Our Responsibility

Our responsibility is to express our conclusions in an independent limited assurance report based on the work performed, which relates solely to the information identified by the symbol in the “GRI content index” section included in the accompanying Annual Report for 2019. This same information in 2018 was reviewed by another assurance provider who issued a report without any reservations.

We conducted our assurance work in accordance with the requirements established in International Standard...
on Assurance Engagements (ISAE) 3000 Revised, Assurance Engagements other than Audits or Reviews of Historical Financial Information, currently in force, issued by the International Auditing and Assurance Standards Board (IAASB) of the International Federation of Accountants (IFAC), and with the guidelines published by the Spanish Institute of Certified Public Accountants on attestation engagements regarding non-financial information statements.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement and, consequently, the level of assurance provided is also lower.

Our work consisted in submitting inquiries to management of Inditex and to the management of various units of the Group that participated in the preparation of the Annual Report, reviewing the processes used to compile and validate the portion of information subject to review by us presented in the Annual Report, and carrying out the following analytical procedures and sample-based review tests for the information subject to review:

- Meetings held with Group personnel to ascertain the business model, policies and management approaches applied, and the main risks relating to these matters, and to obtain the information required for the external review.
- Analysis of the processes used to compile and validate the data for 2019 presented in the Annual Report relating to the indicators subject to review by us.
- Review of the information relating to risks and the policies and management approaches applied in relation to the material matters presented in the Annual Report to the extent that they affect the indicators subject to review by us.
- Verification, by means of sample-based tests, of the information relating to the indicators subject to review by us included in the Annual Report for 2019 and the appropriate compilation thereof based on the data furnished by the Group’s information sources.
- Obtainment of a representation letter from the directors and management.

**Conclusion**

Our conclusion relates solely to the information subject to review specified in the “Our Responsibility” section of this report. Based on the procedures performed in our verification and the evidence we have obtained, nothing has come to our attention that causes us to believe that the information relating to the indicators subject to review by us contained in the Annual Report for 2019 of Industria de Diseño Textil, S.A. and Subsidiaries was not prepared, in all material respects, in accordance with the comprehensive version of the GRI standards, considering the information provided for each indicator and for each of the “other criteria” in the “GRI content index” section.

DELLOITTE, S.L.

Germán de la Fuente
10th June 2020
This report has been prepared in accordance with the comprehensive option of the GRI Sustainability Reporting Standards.

Inditex adheres to the United Nations Global Compact since 2001. In the GRI Content Index of this Report, which also doubles as a Communication on Progress, the different parts of the document related to each of the Global Compact principles are indicated.

The following principles for defining report content included in the GRI Standard 101: Foundation 2016 have been used for the elaboration of this report:

- Stakeholder inclusiveness: Inditex identifies and keeps a constant dialogue with its stakeholders. By doing this, the Group is able to describe its further response to its stakeholders’ expectations and interests.

- Sustainability context: Inditex contributes, or pretends to do so in the future, to the improvement of the economic, environmental and social trends, advances and conditions, at a local, regional or global level, all of them interconnected.

- Materiality: Inditex covers those aspects and indicators which best reflect the organisation’s most significant social, environmental and economic impacts, or those which could be substantially influential on its stakeholders’ evaluations and decisions.

- Completeness: the scope of the material topics Inditex is using and the definition of the information’s boundary must be enough to reflect the social, economic and environmental significant impacts and to allow that stakeholders are able to evaluate the Group’s performance during the fiscal year.

A selection of 40 GRI disclosures identified in the materiality analysis carried out by Inditex were reviewed by Deloitte S.L., pursuant to the revised International Standard on Assurance Engagements (ISAE) 3000, Assurance Engagements Other than Audits or Review of Historical Financial Information, issued by the International Auditing and Assurance Standard Board (IAASB), and with Guideline on attestation engagements of the Statement on Non-financial Information issued by the ICJCE (Institute of Certified Public Accountants of Spain). These disclosures can be found in the GRI Content Index and are marked with this symbol: ☑

Global Compact Principles

Principle 1. Businesses should support and respect the protection of internationally proclaimed Human Rights.

Principle 2. Businesses should make sure that they are not complicit in Human Rights abuses.

Principle 3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

Principle 4. Businesses should uphold the elimination of all forms of forced and compulsory labour.

Principle 5. Businesses should uphold the effective abolition of child labour.


Principle 7. Businesses should support a precautionary approach to environmental challenges.

Principle 8. Businesses should undertake initiatives to promote greater environmental responsibility.


Principle 10. Businesses should work against corruption in all its forms, including extortion and bribery.
GRI 101: FOUNDATION 2016

General Disclosures

GRI 102: GENERAL DISCLOSURES 2016

ORGANIZATIONAL PROFILE

102-1 Name of the organization
Industria de Diseño Textil, S.A.

102-2 Activities, brands, products, and services
19-33

102-3 Location of headquarters
Avenida de la Diputación s/n
Edificio Inditex, Arteixo, A Coruña, España

102-4 Location of operations
391-397

102-5 Ownership and legal form
264-265, 350

102-6 Markets served
391-397

102-7 Scale of the organization
12, 14-15

102-8 Information on employees and other workers
14, 62-63, 69
The distribution of employees by contract type (permanent/temporary) by region is: América 76% of permanent contracts (24% temporary), Spain 75% of permanent contracts (25% temporary), Europe - excluding Spain - 71% permanent contracts (29% temporary) and Asia and the rest of the world 51% of permanent contracts (49% temporary)

102-9 Supply chain
15, 89, 100-101, 319

102-10 Significant changes to the organization and its supply chain
100-103, 401-403

102-11 Precautionary Principle or approach
422-428

102-12 External initiatives
50, 77, 100-103, 310-314

102-13 Membership of associations
4-5, 84, 97, 100-103, 310-314

STRATEGY

102-14 Statement from senior decision-maker
6-7

102-15 Key impacts, risks, and opportunities
404-407

ETHICS AND INTEGRITY

102-16 Values, principles, standards, and norms of behavior
38, 51, 305-306

102-17 Mechanisms for advice and concerns about ethics
306

GOVERNANCE

102-18 Governance structure
264, 271, 283-299

102-19 Delegating authority
283-300

102-20 Executive-level responsibility for economic, environmental, and social topics
298

102-21 Consulting stakeholders on economic, environmental, and social topics
44-45, 57

102-22 Composition of the highest governance body and its committees
271-274

102-23 Chair of the highest governance body
272

102-24 Nominating and selecting the highest governance body
277-279, 290-293

For the GRI Content Index Service, GRI Services reviewed that the GRI content index is clearly presented and the references for all disclosures included align with the appropriate sections in the body of the report.
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<td>Highest governance body's role in sustainability reporting</td>
<td>The Board of Directors is the body in charge of reviewing and approving the issuance of the Annual Report</td>
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<td>102-34</td>
<td>Nature and total number of critical concerns</td>
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<td>102-35</td>
<td>Remuneration policies</td>
<td>296 For further information, please refer to the 2019 Annual Report on Remuneration of Directors (sections A.1 and A.2) which is available at: <a href="https://www.inditex.com/en/compliance/corporate-governance/report-on-remuneration-of-directors">https://www.inditex.com/en/compliance/corporate-governance/report-on-remuneration-of-directors</a></td>
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<td>102-36</td>
<td>Process for determining remuneration</td>
<td>293-296 For further information, please refer to the 2019 Annual Report on Remuneration of Directors (sections A.1.1 and A.1.5) which is available at: <a href="https://www.inditex.com/en/compliance/corporate-governance/report-on-remuneration-of-directors">https://www.inditex.com/en/compliance/corporate-governance/report-on-remuneration-of-directors</a></td>
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<td>102-37</td>
<td>Stakeholders' involvement in remuneration</td>
<td>296-298 For further information, please refer to the 2019 Annual Report on Remuneration of Directors (section A.4) which is available at: <a href="https://www.inditex.com/en/compliance/corporate-governance/report-on-remuneration-of-directors">https://www.inditex.com/en/compliance/corporate-governance/report-on-remuneration-of-directors</a></td>
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**STAKEHOLDER ENGAGEMENT**

| 102-40      | List of stakeholder groups | 44 |          |                  |                          |
| 102-41      | Collective bargaining agreements | 71, 104-108, 111 | Principle 3 |                  |                          |
| 102-42      | Identifying and selecting stakeholders | 44-45 |          |                  |                          |
| 102-43      | Approach to stakeholder engagement | 44-46, 56 |          |                  |                          |
| 102-44      | Key topics and concerns raised | 57, 330-331 |          |                  |                          |

**REPORTING PRACTICE**

| 102-45      | Entities included in the consolidated financial statements | 391-397 |          |                  |                          |
| 102-46      | Defining report content and topic Boundaries | 56-57, 330-331 |          |                  |                          |
| 102-47      | List of material topics | 57, 330-331 |          |                  |                          |
| 102-48      | Restatements of information | 15, 89 For information with organisational or temporal scope different from previous years, the clarifications are described in the information itself |          |                  |                          |
| 102-49      | Changes in reporting | 57, 407 |          |                  |                          |
| 102-50      | Reporting period | The Annual Report reflects the economic, social and environmental performance of the Inditex Group in fiscal year 2019, which runs from 1 February 2019 until 31 January 2020 |          |                  |                          |
| 102-51      | Date of most recent report | June 2019 |          |                  |                          |
| 102-52      | Reporting cycle | Annual |          |                  |                          |
| 102-53      | Contact point for questions regarding the report | 468 |          |                  |                          |
| 102-54      | Claims of reporting in accordance with the GRI Standards | This report has been prepared in accordance with the GRI Standards: Comprehensive option |          |                  |                          |
| 102-55      | GRI content index | 454 |          |                  |                          |
| 102-56      | External assurance | 450-451 |          |                  |                          |
## Material topics

### DIVERSITY, EQUALITY AND INCLUSION

#### GRI 103: MANAGEMENT APPROACH 2016

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<td>103-2</td>
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<td>60-61</td>
<td>For further information please refer to Annex IV of the Consolidated Annual Accounts 2019 (Statement on Non-Financial Information, p. 47-51) which is available at: <a href="http://www.inditex.com/documents/10279/645708/Annual+Accounts+2019+Consolidated.pdf/3013c02d-9f71-28b-106d-a74564eb577">www.inditex.com/documents/10279/645708/Annual+Accounts+2019+Consolidated.pdf/3013c02d-9f71-28b-106d-a74564eb577</a></td>
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<td>103-3</td>
<td>Evaluation of the management approach</td>
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<td>14, 62</td>
<td>For further information please refer to Annex IV of the Consolidated Annual Accounts 2019 (Statement on Non-Financial Information, p. 47-51) which is available at: <a href="http://www.inditex.com/documents/10279/645708/Annual+Accounts+2019+Consolidated.pdf/3013c02d-9f71-28b-106d-a74564eb577">www.inditex.com/documents/10279/645708/Annual+Accounts+2019+Consolidated.pdf/3013c02d-9f71-28b-106d-a74564eb577</a></td>
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#### GRI 405: DIVERSITY AND EQUAL OPPORTUNITY 2016

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<td>405-1</td>
<td>Diversity of governance bodies and employees</td>
<td>68-69</td>
<td>For further information please refer to Annex IV of the Consolidated Annual Accounts 2019 (Statement on Non-Financial Information, p. 44-47) which is available at: <a href="http://www.inditex.com/documents/10279/645708/Annual+Accounts+2019+Consolidated.pdf/3013c02d-9f71-28b-106d-a74564eb577">www.inditex.com/documents/10279/645708/Annual+Accounts+2019+Consolidated.pdf/3013c02d-9f71-28b-106d-a74564eb577</a></td>
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#### OTHER DISCLOSURES: DIVERSITY AND EQUAL OPPORTUNITIES

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<td>AF27</td>
<td>Policy and actions to protect the pregnancy and maternity rights of women workers</td>
<td>Information related to work-life balance can be found at Annex IV of the Consolidated Annual Accounts 2019 (Statement on Non-Financial Information, p. 50-51), which is available at: <a href="http://www.inditex.com/documents/10279/645708/Annual+Accounts+2019+Consolidated.pdf/3013c02d-9f71-28b-106d-a74564eb577">www.inditex.com/documents/10279/645708/Annual+Accounts+2019+Consolidated.pdf/3013c02d-9f71-28b-106d-a74564eb577</a></td>
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<td>AF32</td>
<td>Actions to address gender discrimination and to provide opportunities for the advancement of women workers</td>
<td>For further information please refer to Annex IV of the Consolidated Annual Accounts 2019 (Statement on Non-Financial Information, p. 47-51) which is available at: <a href="http://www.inditex.com/documents/10279/645708/Annual+Accounts+2019+Consolidated.pdf/3013c02d-9f71-28b-106d-a74564eb577">www.inditex.com/documents/10279/645708/Annual+Accounts+2019+Consolidated.pdf/3013c02d-9f71-28b-106d-a74564eb577</a></td>
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#### GRI 406: NON-DISCRIMINATION 2016

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<td>406-1</td>
<td>Incidents of discrimination and corrective actions taken</td>
<td>The Inditex Group did not register any instances of discrimination that had implied violations of human rights through the available channels in 2019.</td>
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#### LABOUR PRACTICES (OWN OPERATIONS)

#### GRI 103: MANAGEMENT APPROACH 2016

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<td>The management approach and its components</td>
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<td>60-61, 68</td>
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<td>103-3</td>
<td>Evaluation of the management approach</td>
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#### GRI 401: EMPLOYMENT 2016

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<td>401-1</td>
<td>New employee hires and employee turnover</td>
<td>In 2019 Inditex hired 2,225 new employees, 94% of whom female. 88% of new hires are under the age of 36 years. 12% are aged between 30 and 50; and the remaining are over the age of 50. The majority of new hires were concentrated in Europe. Turnover at the Inditex Group, including voluntary departures, was 50%, 49% among women and 53% among men. By age, turnover among the under the age of 30 was 87%; among those aged between 30 and 45, it was 12%; and among those over 50, it was 1%. Turnover varied significantly by region: it was 129% in Asia, followed by 78% in the Americas, 48% in Europe (excluding Spain) and 18% in Spain</td>
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<td>401-2</td>
<td>Benefits provided to full-time employees that are not provided to temporary or part-time workers</td>
<td>The Group provides the same benefits to temporary and part-time workers as it does to full-time workers</td>
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<td>GRI STANDARD</td>
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<td>401-3</td>
<td>Parental leave</td>
<td>In 2019, 100% of our employees in Spain (48,687 people) were entitled to parental leave (36,279 women and 12,408 men). 2,938 people enjoyed maternity and paternity leave (1,902 women and 451 men), practically all of them returning to their jobs: 2,319 (1,902 women and 427 men). Therefore, the return to work rate is 98.6% (99.5% in the case of women and 94.7% in the case of men). The number of people working for the Group 12 months after having come back from maternity/paternity leave is 2,034 (1,640 women and 394 men), the retention rate amounting to 93.9% (93.2% for women and 97.0% for men). Information corresponding to Spain, international related data is not available with the level of disaggregation required in the company’s systems. Inditex is working on improving its reporting systems with a view to disclosing this information in 2022.</td>
<td></td>
<td>Pages 450-451</td>
<td>Principle 6</td>
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**OTHER DISCLOSURES: EMPLOYMENT**

AF22 Policy and practices regarding the use of employees with non-permanent and non-fulltime | 69 |

AF23 Policy regarding the use of home working | Information related with work-life balance can be found at Annex IV of the Consolidated Annual Accounts 2019 (Statement on Non-Financial information, p.50-51), which is available at: www.inditex.com/documents/10279/645708/Annual+Accounts+2019+Consolidads.pdf/3013c02d-9f7f-28fa-1b6d-a74564a69b97 |

**GRI 402: LABOR/MANAGEMENT RELATIONS 2016**

402-1 Minimum notice periods regarding operational changes | The collective bargaining agreements in force do not include minimum notice period for officially communicating significant operational changes at Inditex. However, whenever significant developments occur, they are duly announced with the notice periods provided for in prevailing labour law (article 41 of the Spanish Workers’ Statute). | Principle 3 |

**OTHER DISCLOSURES: LABOUR/MANAGEMENT RELATIONS 2016**

AF29 Percentage of workplaces where there is one or more independent trade union(s) | 35% of Inditex’s workplaces have workers representatives. |

AF30 Percentage of workplaces where, in the absence of a trade union, there are worker-management committees, broken down by country. | The Group does not participate in worker-management committees in the absence of a trade unions. |

**GRI 403: OCCUPATIONAL HEALTH AND SAFETY 2016**

403-1 Workers representation in formal joint management-worker health and safety committees | The existing committees represent all workers (management and employees) at the same level and all of the agreements reached are confirmed by management. |

403-2 Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities | 73 | In 2019 there were no work-related fatalities registered. The available information related with absenteeism and occupational diseases can be found at Annex IV of the Consolidated Annual Accounts 2019 (Statement on Non-Financial information, p.62-65), which is available at: www.inditex.com/documents/10279/645708/Annual+Accounts+2019+Consolidads.pdf/3013c02d-9f7f-28fa-1b6d-a74564a69b97 |

403-3 Workers with high incidence or high risk of diseases related to their occupation | As a general rule, the Group’s employees are not involved in activities that present a high incidence or risk of specific serious diseases. |

403-4 Health and safety topics covered in formal agreements with trade unions | All of the committees reach agreements related with worker health and safety. During the reporting period, Inditex had agreements in effect with unions at the local and international levels which address aspects such as personal protective equipment, periodic inspections, skills training and education and grievance mechanisms, among others |

**OTHER DISCLOSURES: OCCUPATIONAL HEALTH AND SAFETY**

AF31 Initiatives and programs to respond to, reduce, and prevent the occurrence of musculoskeletal disorders | Information related with the prevention of muscle and bone injuries can be found at Annex IV of the Consolidated Annual Accounts 2019 (Statement on Non-Financial information, p.60), which is available at: www.inditex.com/documents/10279/645708/Annual+Accounts+2019+Consolidads.pdf/3013c02d-9f7f-28fa-1b6d-a74564a69b97 |

**GRI 407: FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING 2016**

407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk | 104-108, 111, 144 | Inditex’s Code of Code of Conduct and Responsible Practices specifically addresses the right to freedom of association and collective bargaining. This Code applies to all of the Group’s operations. The Code of Conduct for Manufacturers and Suppliers, which applies to all of the Group’s suppliers, also endorses this right. The Code of Conduct for Manufacturers and Suppliers Compliance Programme assesses compliance with workers’ right to freedom of association | Principle 3 |
OTHER DISCLOSURES: WAGES AND HOURS

AF25 Policy and practices on wage deductions that are not mandated by law
Inditex does not have policies or practices for wage deductions that are not mandated by law.

AF26 Policy on working hours, including definition of overtime, and actions to prevent excessive and forced overtime
In accordance with the Group’s Code of Conduct and Responsible Practices, weekly working hours and overtime shall not exceed the legal limit established by the legislation of each country. Overtime will always be voluntary and paid in accordance with the law. Furthermore, the Inditex Group’s Policy on Human Rights includes the rejection of any form of forced or compulsory labor, as defined in ILO’s Convention number 29. The foregoing applies to both its own employees and its supply chain and to any natural and/or legal person related to Inditex. In addition, the Code of Conduct itself defends and promotes compliance with human and labor rights and commits to the application of regulations and good practices in terms of conditions of employment, health and safety in the workplace, not allowing any form of violence, harassment or abuse at work.

ATTRACTING AND RETAINING TALENT

GRI 103: MANAGEMENT APPROACH 2016

103-1 Explanation of the material topic and its boundary
103-2 The management approach and its components
103-3 Evaluation of the management approach

DEVELOPMENT OF HUMAN CAPITAL

GRI 103: MANAGEMENT APPROACH 2016

103-1 Explanation of the material topic and its boundary
103-2 The management approach and its components
103-3 Evaluation of the management approach

GRI 404: TRAINING AND EDUCATION 2016

404-1 Average hours of training per year per employee
The average hours of training for fiscal year 2019 has been 17.5 hours per employee (17.8 hours in the case of women and 16.6 hours in the case of men). The data pertaining to training broken down by gender is available in 44 countries representing 94% of the Group’s employees.

404-2 Programs for upgrading employee skills and transition assistance programs
95% of the Group’s employees are under the age of 45, which is why the Group does not foresee the need to develop programmes to assist employees in managing career endings in the near future.

404-3 Percentage of employees receiving regular performance and career development reviews
All of our people have a performance review at least once a year, and each brand carries out this process according to its management model. In the case of the stores, the conversation about performance is continuous, linked to the contribution of each person to the objectives of the store, and focused on professional development. In line with one of our characteristic features, internal promotion. In the case of offices and at least once a year, the objectives and performance of each person are discussed individually and the objectives for the next period are set. In addition, dialogue is established to promote the professional development of the employee and learn about its concerns. Variable remuneration is totally linked to the Company’s results and to the contribution of each person to its achievement.

WOMEN EMPOWERMENT

GRI 103: MANAGEMENT APPROACH 2016

103-1 Explanation of the material topic and its boundary
103-2 The management approach and its components
103-3 Evaluation of the management approach

RESPONSIBLE PURCHASING PRACTICES

GRI 103: MANAGEMENT APPROACH 2016

103-1 Explanation of the material topic and its boundary
103-2 The management approach and its components
103-3 Evaluation of the management approach
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<td><strong>OTHER DISCLOSURES: CAPACITY BUILDING</strong></td>
<td>AF5  Strategy and scope of efforts to strengthen capacity of management, workers and other staff to improve in social and environmental performance.</td>
<td>66, 80, 95, 113</td>
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<td><strong>OTHER DISCLOSURES: BUSINESS INTEGRATION</strong></td>
<td>AF6 Policies for supplier selection, management, and termination</td>
<td>89-90, 142, 144-146</td>
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<td>Inditex's Code of Conduct for Manufacturers and Suppliers stipulates the standards and requirements to which suppliers looking to form part of Inditex's supply chain are bound. It can be retrieved from Inditex's website at: <a href="http://www.inditex.com/en/our-commitment-to-people/our-suppliers">www.inditex.com/en/our-commitment-to-people/our-suppliers</a></td>
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<td>AF17 Actions to identify and mitigate business practices that affect code compliance</td>
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<td><strong>OTHER DISCLOSURES: EMPLOYMENT</strong></td>
<td>AF24 Policy on the use and selection of labour brokers, including adherence to relevant ILO Conventions</td>
<td>98-104, 116, 140</td>
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<td>Inditex analyzes and monitors compliance with its Sustainability Strategy by suppliers by means of its Code of Conduct for Manufacturers and Suppliers Compliance Programme</td>
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<td><strong>PROMOTION OF SOCIALLY SUSTAINABLE PRODUCTION ENVIRONMENTS</strong></td>
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<td>103-2 The management approach and its components</td>
<td>76-77, 98-103</td>
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<td>103-3 Evaluation of the management approach</td>
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<td>412-1 Operations that have been subject to human rights reviews or impact assessments</td>
<td>15, 142-144, 321</td>
<td>Principle 1 and 2</td>
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<td>412-2 Employee training on human rights policies or procedures</td>
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<td>Principle 1</td>
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<td>During 2019, progress has been made in due diligence processes in the supply chain. Thus, hand in hand with the Shift organization, our Social Sustainability teams in the countries that concentrate practically all of Inditex’s production have received training in Human Rights and in the processes inspired by the United Nations Guiding Principles on Business and Human Rights; to identify and prioritize the potential impacts on Human Rights and on the different groups</td>
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<td>412-3 Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening</td>
<td>102, 104, 140-141</td>
<td>Principle 2</td>
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<td><strong>GRI 414: SUPPLIER SOCIAL ASSESSMENT 2016</strong></td>
<td>414-1 New suppliers that were screened using social criteria</td>
<td>15, 89, 142-144, 321</td>
<td>Principle 2</td>
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<td><strong>OTHER DISCLOSURES: AUDIT PROCESS</strong></td>
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<td><strong>OTHER DISCLOSURES: GRIEVANCE PROCEDURES</strong></td>
<td>AF4 Policy and procedures for receiving, investigating, and responding to grievances and complaints</td>
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<td><strong>OTHER DISCLOSURES: NON-COMPLIANCE FINDINGS</strong></td>
<td>AF9 Incidents of non-compliance with legal requirements or collective bargaining agreements on wages</td>
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<td>AF10 Incidents of non-compliance with overtime standards</td>
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<td>AF12 Incidents of the use of child labour</td>
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<td>AF13 Incidents of non-compliance with standards on gender discrimination</td>
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<td>AF14</td>
<td>Incidents of non-compliance with code of conduct</td>
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<td>AF15</td>
<td>Analysis of data from code compliance audits</td>
<td>142-145</td>
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**OTHER DISCLOSURES: REMEDIATION**

AF16 Remediation practices to address non-compliance findings | 92, 142, 144-146, 321 | Pages 450-451 |

**RESPECT FOR HUMAN AND LABOUR RIGHTS IN THE SUPPLY CHAIN**

**GRI 103: MANAGEMENT APPROACH 2016**

- 103-1 Explanation of the material topic and its Boundary | 57, 330 |
- 103-2 The management approach and its components | 45, 51, 76-77, 98-141 |
- 103-3 Evaluation of the management approach | 101, 144 |

**GRI 408: CHILD LABOR 2016**

- 408-1 Operations and suppliers at significant risk for incidents of child labor | 142-145 |
  - Inditex’s Code of Manufacturers and Suppliers Compliance Programme assesses the level of compliance with prohibition of child labour, as stated in said Code. The Code is applicable to all of the Group’s operations and suppliers |
  - Principle 5 |

**GRI 409: FORCED OR COMPULSORY LABOR 2016**

- 409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor | 142-145 |
  - Inditex’s Code of Manufacturers and Suppliers Compliance Programme assesses the level of compliance with prohibition of forced labour, as stated in said Code. The Code is applicable to all of the Group’s operations and suppliers |
  - Principle 4 |

**OTHER DISCLOSURES: CODE OF CONDUCT**

AF1 Code of conduct content and coverage | 142 |

AF7 Number and location of workplaces covered by code of conduct | 89, 142-144 |
  - The Code of Conduct for Manufacturers and Suppliers applies to 100% of Inditex’s suppliers and manufacturers. For further supply chain identification information, please visit Inditex’s website: www.inditex.com/en/our-commitment-to-people/our-suppliers |
  - Pages 450-451 |

**TRANSPARENCY AND TRACEABILITY OF THE SUPPLY CHAIN**

**GRI 103: MANAGEMENT APPROACH 2016**

- 103-1 Explanation of the material topic and its Boundary | 57, 330 |
- 103-2 The management approach and its components | 76-77, 91-92, 97 |
- 103-3 Evaluation of the management approach | 89, 319 |

**PROTECTION OF BIODIVERSITY**

**GRI 103: MANAGEMENT APPROACH 2016**

- 103-1 Explanation of the material topic and its Boundary | 57, 330 |
- 103-2 The management approach and its components | 76, 84-87 |
  - Inditex’s Biodiversity Policy (www.inditex.com/documents/10279/242165/Biodiversity+Strategy_Inditex.pdf/b1954ead-d283-43f2-acff-31329f56879a) sets out its goals in the biodiversity protection and conservation arena. The policy was designed bearing in mind the principles established in the United Nations Convention on Biological Diversity and acknowledging the work of the International Union for Conservation of Nature (IUCN). To guarantee application of this strategy, these principles are layered into the master plans of each of the key areas comprising the business model. |
- 103-3 Evaluation of the management approach | 77, 86-87 |

**GRI 304: BIODIVERSITY 2016**

- 304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas | Not applicable. The lands owned by Inditex are neither adjacent to nor located within protected areas or areas of high biodiversity value, so that the Group does not generate significant impacts on biodiversity |
  - Principle 8 |
- 304-2 Significant impacts of activities, products, and services on biodiversity | 84-87 |
  - Principle 8 |
### GRI Disclosure

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<td>304-3</td>
<td>3 Habitats protected or restored</td>
<td>Not applicable. Inditex's business is to distribute fashion garments (clothing, footwear, accessories and homeware) which it procures as finished products from its suppliers; as a result there are no habitats protected or restored as a result of its business activities</td>
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<td>Principle 8</td>
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<tr>
<td>304-4</td>
<td>IUCN Red List species and national conservation list species with habitats in areas affected by operations</td>
<td>Not applicable. Inditex's business is to distribute fashion garments (clothing, footwear, accessories and homeware) which it procures as finished products from its suppliers; as a result there are no habitats affected by its business operations</td>
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<td>Principle 8</td>
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### SUSTAINABLE PRODUCT

#### GRI 103: MANAGEMENT APPROACH 2016

| GRI 103-1 | Explanation of the material topic and its Boundary | 57, 330 |
| GRI 103-2 | The management approach and its components | 76, 80, 82-87, 175 |
| GRI 103-3 | Evaluation of the management approach | 77, 83-85 |

#### GRI 301: MATERIALS 2016

| GRI 301-1 | Materials used by weight or volume | 84 |
| GRI 301-2 | Recycled input materials used | 14, 84-85 |
| GRI 301-3 | Reclaimed products and their packaging materials | 14, 176-177, 182-183 |

### MANAGEMENT OF CHEMICAL SUBSTANCES AND SUSTAINABLE PROCESSES IN MANUFACTURING

#### GRI 103: MANAGEMENT APPROACH 2016

| GRI 103-1 | Explanation of the material topic and its Boundary | 57, 330 |
| GRI 103-2 | The management approach and its components | 76, 87, 148-151, 155 |
| GRI 103-3 | Evaluation of the management approach | 14, 149-150, 156-157, 322-323 |

#### GRI 306: EFFLUENTS AND WASTE 2016

| GRI 306-2 | Waste by type and disposal method | 180-183 None of the waste generated is disposed of through deep-well injection or stored in-situ |
| GRI 306-3 | Significant spills | There were no significant spills during the reporting period. With the aim of preventing them in the supply chain, the Inditex Group has committed with the Zero Discharge of Hazardous Chemicals and has joined the Changing Markets Foundation Initiative whose aim is to manufacture a viscose that is responsible and sustainable at every step of the value chain. This will improve the management of waste and yield greater control over the productive process. Similarly, Inditex also supports the Roadmap towards responsible viscose & modal fibre manufacturing championed by this organisation |
| GRI 306-4 | Transport of hazardous waste | Inditex does not transport, import or export any of the waste classified as hazardous in the Basel Convention in any of the countries in which it operates |
| GRI 306-5 | Water bodies affected by water discharges and/or runoff | 174 The water consumed at Inditex is discharged through the sewage networks and this is done with all the corresponding permits. In the event of incidents, Inditex analyses their root causes and searches for appropriate solutions. As a result, the organisation’s water discharges and runoffs do not have a significant impact on water bodies and their habitats. As for its suppliers, and framed the pledge made in November 2012 to attain zero discharge of unwanted chemical substances by 2025, Inditex is working together with its suppliers under the scope of its ‘Water in the Supply Chain Master Plan’ in order to promote the sustainable use of this vital resource. Since 2016, we have been working on the provision of technical training in this supply chain, a project which consists of assessing our suppliers’ environmental records and their technical capabilities with a view to helping them improve their environmental performance and, thus, build a more sustainable production chain and move towards zero discharges by 2020. To learn more, please visit www.wateractionplan.com, specifically the ‘Detox commitment’ tab. Also please see https://www.inditex.com/en/our-commitment-to-the-environment/water |

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### GRI 308: SUPPLIER ENVIRONMENTAL ASSESSMENT 2016

| GRI 308-1 | New suppliers that were screened using environmental criteria | Pages 450-451 Principle 8
| GRI 308-2 | Negative environmental impacts in the supply chain and actions taken | Pages 450-451 Principle 8

### OTHER DISCLOSURES: MATERIALS

| AF18 | Programmes to replace organic-based adhesives and primers with water-based adhesives and primers | 87, 150-151, 153-154
| AF19 | Practices to source safer alternative substances to those on the restricted substances list, including description of associated management systems | 87, 322-323
| AF20 | List of environmentally preferable materials used in apparel and footwear products | 84-87

### PRODUCT QUALITY, HEALTH AND SAFETY

**GRI 103: MANAGEMENT APPROACH 2016**

| 103-1 | Explanation of the material topic and its boundary | 57, 330
| 103-2 | The management approach and its components | 76, 152-155
| 103-3 | Evaluation of the management approach | 14, 149-150, 156-158, 322-323

**GRI 416: CUSTOMER HEALTH AND SAFETY 2016**

| 416-1 | Assessment of the health and safety impacts of product and service categories | 14, 149, 155-158, 322-323
We have the most demanding product health and safety standards in place, a mandatory reference in the manufacturing practices of all the suppliers that make up our supply chain, and of general and mandatory application to all the items we commercialize (the items not included in the scope of the Group’s health and safety standards have reports of minimum requirements generated specifically according to the legal requirements applicable to the typology of products and commercialization markets)

| 416-2 | Incidents of non-compliance concerning the health and safety impacts of products and services | 158, 323, Pages 450-451

### PRODUCT INFORMATION AND LABELLING

**GRI 103: MANAGEMENT APPROACH 2016**

| 103-1 | Explanation of the material topic and its boundary | 57, 330
| 103-2 | The management approach and its components | 76, 82
| 103-3 | Evaluation of the management approach | 77, 83, 97

**GRI 417: MARKETING AND LABELING 2016**

| 417-1 | Requirements for product and service information and labeling | 83
The Group’s product health and safety standards are compulsory across the entire production chain (100%).

| 417-2 | Incidents of non-compliance concerning product and service information and labeling | No significant incidents of non-compliance with the requirements or voluntary codes concerning product information and labelling were recorded through any of the available channels in 2019

| 417-3 | Incidents of non-compliance concerning marketing communications | The Inditex Group did not record significant incidents of non-compliance concerning marketing communications through any of the available channels in 2019

### ANIMAL WELFARE

**GRI 103: MANAGEMENT APPROACH 2016**

| 103-1 | Explanation of the material topic and its boundary | 57, 330
| 103-2 | The management approach and its components | 87

### ENERGY AND CLIMATE CHANGE

**GRI 302: ENERGY 2016**

| 302-1 | Energy consumption within the organization | 15, 163-164, 166, 170 | Pages 450-451 Principles 7 and 8 |
| 302-2 | Energy consumption outside of the organization | 165 | Pages 450-451 Principle 8 |
| 302-3 | Energy intensity | 15, 163, 166 | Principle 8 |
| 302-4 | Reduction of energy consumption | 15, 163-164, 166, 170 | Pages 450-451 Principles 8 and 9 |
| 302-5 | Reductions in energy requirements of products and services | 163-164, 166, 170 | Principles 8 and 9 |

**OTHER DISCLOSURES: ENERGY**

| AF21 | Amount of energy consumed and percentage of the energy that is from renewable sources | 15, 163-164, 172 | Pages 450-451 |

**GRI 305: EMISSIONS 2016**

| 305-1 | Direct (Scope 1) GHG emissions | 165, 324 | Pages 450-451 Principles 7 and 8 |
| 305-2 | Energy indirect (Scope 2) GHG emissions | 165, 324 | Pages 450-451 Principles 7 and 8 |
| 305-3 | Other indirect (Scope 3) GHG emissions | 165 | Pages 450-451 Principles 7 and 8 |
| 305-4 | GHG emissions intensity | 165, 324 | Principle 8 |
| 305-5 | Reduction of GHG emissions | 163, 165, 324 | Pages 450-451 Principles 8 and 9 |
| 305-6 | Emissions of ozone-depleting substances (ODS) | 170 | Principles 7 and 8 |

Plans have been created to replace air conditioning equipment with more efficient class A equipment for existing stores, guaranteeing the absence of gases that destroy the ozone layer. In addition, thanks to the eco-efficiency measures implemented in our stores, significant electrical savings have been achieved, especially in HVAC systems, since they can achieve at least 20% better performance and energy efficiency than conventional equipment. The set of these actions to promote energy efficiency, added to the realization of our commitment to renewable energies, has allowed to reduce GHG emissions associated with our activity.
**USE OF WATER**

**GRI 103: MANAGEMENT APPROACH 2016**

103-1 Explanation of the material topic and its Boundary 57, 330

103-2 The management approach and its components

103-3 Evaluation of the management approach 77, 174

**GRI 303: WATER 2016**

303-1 Water withdrawal by source 174

303-2 Water sources significantly affected by withdrawal of water 174

303-3 Water recycled and reused 174

**PACKAGING**

**GRI 103: MANAGEMENT APPROACH 2016**

103-1 Explanation of the material topic and its Boundary 57, 330

103-2 The management approach and its components 76, 183

103-3 Evaluation of the management approach 77, 183

**CUSTOMER RELATIONS**

**GRI 103: MANAGEMENT APPROACH 2016**

103-1 Explanation of the material topic and its Boundary 57, 331

103-2 The management approach and its components 186-187

103-3 Evaluation of the management approach 188

**BRAND PROTECTION AND MANAGEMENT**

**GRI 103: MANAGEMENT APPROACH 2016**

103-1 Explanation of the material topic and its Boundary 57, 331

103-2 The management approach and its components 405

103-3 Evaluation of the management approach 315, 421-422

**INTEGRATED SHOPPING EXPERIENCE**

**GRI 103: MANAGEMENT APPROACH 2016**

103-1 Explanation of the material topic and its Boundary 57, 331

103-2 The management approach and its components 190-211

103-3 Evaluation of the management approach 195, 197, 202, 204, 207-211

**CYBER SECURITY AND DATA PROTECTION**

**GRI 103: MANAGEMENT APPROACH 2016**

103-1 Explanation of the material topic and its Boundary 57, 331
### GRI 418: CUSTOMER PRIVACY 2016

- **418-1** Substantiated complaints concerning breaches of customer privacy and losses of customer data
  - Inditex did not receive any significant administrative sanctions for fundamental non-compliances with customer privacy and data protection laws through any of the channels available for this purpose in 2019

### TECHNOLOGICAL INNOVATION

#### GRI 103: MANAGEMENT APPROACH 2016

- **103-1** Explanation of the material topic and its Boundary
- **103-2** The management approach and its components
- **103-3** Evaluation of the management approach

### TRANSPARENCY AND TAX CONTRIBUTION

#### GRI 103: MANAGEMENT APPROACH 2016

- **103-1** Explanation of the material topic and its Boundary
- **103-2** The management approach and its components
- **103-3** Evaluation of the management approach

### SOCIAL PROGRAMMES INVESTMENT

#### GRI 103: MANAGEMENT APPROACH 2016

- **103-1** Explanation of the material topic and its Boundary
- **103-2** The management approach and its components
- **103-3** Evaluation of the management approach

### GRI 203: INDIRECT ECONOMIC IMPACTS 2016

- **203-1** Infrastructure investments and services supported
- **203-2** Significant indirect economic impacts

### GRI 413: LOCAL COMMUNITIES 2016

- **413-1** Operations with local community engagement, impact assessments, and development programs
- **413-2** Operations with significant actual and potential negative impacts on local communities

### OTHER DISCLOSURES: COMMUNITY INVESTMENT

- **AF33** Priorities in community investment strategy
- **AF34** Amount of investment in worker communities broken down by location

### SOCIOECONOMIC IMPACT ON SOCIETY

#### GRI 103: MANAGEMENT APPROACH 2016

- **103-1** Explanation of the material topic and its Boundary
- **103-2** The management approach and its components
- **103-3** Evaluation of the management approach

### GRI 201: ECONOMIC PERFORMANCE 2016

- **201-1** Direct economic value generated and distributed
- **201-2** Financial implications and other risks and opportunities due to climate change
- **201-3** Defined benefit plan obligations and other retirement plans
- **201-4** Financial assistance received from government

During fiscal year 2019, considering all markets where the Group operates, Inditex has received 0.4 millions of euros in concept of public grants.
REGULATORY COMPLIANCE AND RESPONSIBLE PRACTICES

GRI 103: MANAGEMENT APPROACH 2016

103-1 Explanation of the material topic and its Boundary 57, 331
103-2 The management approach and its components 256-259
103-3 Evaluation of the management approach 256, 260-261

GRI 206: ANTI-COMPETITIVE BEHAVIOR 2016

206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices

The Inditex Group did not record any legal actions related with anticompetitive behaviour, anti-trust, or monopoly practices through any of the available channels in 2019.

GRI 307: ENVIRONMENTAL COMPLIANCE 2016

307-1 Non-compliance with environmental laws and regulations

The Inditex Group did not receive any penalties or fines of significant amount for non-compliance with environmental laws or regulations through any of the channels available to this end in 2019.

GRI 419: SOCIOECONOMIC COMPLIANCE 2016

419-1 Non-compliance with laws and regulations in the social and economic area

The Inditex Group did not receive any significant fines for non-compliance with laws or regulations applicable to it through any of the channels available to this end in 2019.

CORPORATE GOVERNANCE

GRI 103: MANAGEMENT APPROACH 2016

103-1 Explanation of the material topic and its Boundary 57, 331
103-2 The management approach and its components 262-263
103-3 Evaluation of the management approach 280-282

GRI 415: PUBLIC POLICY 2016

415-1 Political contributions

Inditex’s Code of Conduct and Responsible Practices expressly stipulates that all dealings between Inditex and governments, authorities, institutions and political parties must be framed by the principles of lawfulness and neutrality. Any contributions made by the company, whether in cash or in-kind, to political parties, institutions or public authorities must be made in accordance with prevailing legislation. So as to guarantee transparency in this respect they must be preceded by a report from the legal advisory department certifying their absolute lawfulness.

Principle 10

RISK MANAGEMENT AND CONTROL SYSTEMS

GRI 103: MANAGEMENT APPROACH 2016

103-1 Explanation of the material topic and its Boundary 57, 331
103-2 The management approach and its components 417, 419-429
103-3 Evaluation of the management approach 421-422

CORRUPTION AND BRIBERY

GRI 103: MANAGEMENT APPROACH 2016

103-1 Explanation of the material topic and its Boundary 57, 331
103-2 The management approach and its components 305-307
103-3 Evaluation of the management approach 307

GRI 205: ANTI-CORRUPTION 2016

205-1 Operations assessed for risks related to corruption

Inditex’s Code of Conduct and Responsible Practices covers the prevention of corruption in all its manifestations. The Code applies to 100% of the Group’s business units and can be downloaded from the corporate website at: www.inditex.com/en/how-we-do-business/right-to-wear

205-2 Communication and training about anti-corruption policies and procedures

Pages 450-451

205-3 Confirmed incidents of corruption and actions taken

Inditex was not made aware during social year 2019, either through its Ethics Committee or any other channel, that any legal proceedings had been taken in the areas of corruption or bribery that could affect the company.

Pages 450-451

Principle 10

RELATIONSHIP WITH STAKEHOLDERS

GRI 103: MANAGEMENT APPROACH 2016

103-1 Explanation of the material topic and its Boundary 57, 331
103-2 The management approach and its components 44-45
103-3 Evaluation of the management approach 46-47