

**Corporate Human Rights Benchmark
2023 Company Scorecard**

Company name Industria de Diseno Textil (Inditex)
Sector Apparel (supply chain only)
Overall score 42.2 out of 100

Theme score	Out of	For theme
5.3	10	A. Governance and Policy Commitments
16.2	25	B. Embedding Respect and Human Rights Due Diligence
7.0	20	C. Remedies and Grievance Mechanisms
10.4	25	D. Performance: Company Human Rights Practices
3.3	20	E. Performance: Responses to Serious Allegations

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2022 Methodology document for the sector concerned. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policy Commitments (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: General HRs commitment: The Human Rights Policy indicates: 'Inditex undertakes to play an active role in the promotion of Human Rights, and to work proactively to respect them'. 'This Policy sets forth Inditex's and its corporate group [...] position with regard to its commitment to respecting the internationally recognized Human Rights, and it lays down such values and principles that will serve as a guideline to its business activities in all its scopes of action'. [Human rights policy 2016, 12/2016: inditex.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Commitment to UNGPs: The Human Rights Policy indicates: 'Through this Policy, Inditex implements its commitment towards respecting and promoting Human Rights, as set forth in the United Nations Guiding Principles on Business and Human Rights, and fostering them in the communities where it operates'. [Human rights policy 2016, 12/2016: inditex.com]
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Commitment to ILO core principles: The Human Rights Policy indicates: 'Inditex undertakes to respect all its employees' Human and Labour Rights, namely those set forth as fundamental, as defined in ILO Conventions'. The Company's Human Rights Policy covers each ILO Core commitment, as indicated below. [Human rights policy 2016, 12/2016: inditex.com] Met: Explicitly lists all four ILO core principles: The Company's Human Rights Policy covers each ILO Core commitment: discrimination, forced labour, child

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			<p>labour, freedom of association and collective bargaining. As for freedom of association and collective bargaining, it adds: 'Inditex acknowledges the right of its employees to set up, be involved or join trade unions and/or organization that defend and promote their interests, regardless of the environment where they work. It also ensures its workers respect for collective bargaining, freedom of opinion and protection for the workers' representatives'. [Human rights policy 2016, 12/2016: inditex.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expects suppliers to commit to ILO core principles: The Code of Conduct for Manufactures and Suppliers has explicit requirements regarding each ILO core area: discrimination, forced labour, child labour, freedom of association and collective bargaining, as indicated below. [Code of Conduct for Suppliers, N/A: inditex.com] • Met: Explicitly lists all four ILO core principles for suppliers: The Code of Conduct for Manufactures and Suppliers indicates: ' Inditex shall not allow any form of forced or involuntary labour in their manufacturers and suppliers. [...] Manufacturers and suppliers shall not employ minors. [...] Manufacturers and suppliers shall not apply any type of discriminatory practice [...] Manufacturers and suppliers shall ensure that their employees, without distinction, have the right of association, union membership and collective bargaining. [...] Where the rights to Freedom of Association and Collective Bargaining are restricted under law, the appropriate channels to ensure a reasonable and independent exercise of such rights must be designed'. [Code of Conduct for Suppliers, N/A: inditex.com]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commitment to respect H&S of workers: The Human Rights Policy indicates: 'All Inditex's employees work in healthy and safe places. The Company guarantees a healthy and safe work environment to its employees through different procedures and regulations in the area of occupational hazards and health and safety at work, fulfilling all the requirements on this topic laid down in the domestic laws and regulations of the countries where it operates'. [Human rights policy 2016, 12/2016: inditex.com] • Met: Commitment to ILO working hours standards or 48 hour regular work week: The Human Rights Policy indicates: 'Inditex treats its employees with respect in a just and fair manner, and pays their remuneration in accordance with the applicable statutory provisions, including minimum wages, overtime and benefits. The weekly working hours and overtime shall not exceed the statutory limit set forth in the laws and regulations of each country. Overtime shall always be voluntary and paid according to law'. The Code of Conduct and Responsible Practices states: 'Working hours and overtime shall not exceed the statutory limit set forth in the laws and regulations of each country'. However, no evidence found of the Company explicitly committing to respect ILO conventions on working hours or that publicly states that workers are not required to work more than 48 hours as regular working week, and that overtime is paid at a premium rate. The 2022 Annual Report notes: 'Inditex is committed to complying with applicable national laws and/or conventions, in furtherance of ILO Conventions 1 and 47 and of ILO Recommendation 116 concerning the working week and hours of work'. The Global Agreement between Inditex and UNI Global Union has similar provisions on working hours. Only policy commitments are considered a suitable source for this indicator under CHRB revised approach. The GFA can be considered a policy source. [Human rights policy 2016, 12/2016: inditex.com] & [Code of conduct and responsible business practices, 07/2012: inditex.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expects suppliers to commit to H&S of workers: The Code of Conduct for Manufactures and Suppliers contains provisions on safe and hygienic working conditions: 'Manufacturers and suppliers shall provide a safe and healthy workplace to their employees, ensuring minimum conditions of light, ventilation, hygiene, fire prevention, safety measures and access to a drinking water supply. [...] Manufacturers and suppliers shall take the required steps to prevent accidents and injuries to health of their workers, by minimizing as much as possible the risks inherent to work. [...]'. [Code of Conduct for Suppliers, N/A: inditex.com] • Met: Expects suppliers to commit to ILO working hours standards or 48 hour regular work week: The Code of Conduct for Manufactures and Suppliers indicates: 'Manufacturers and suppliers shall adjust the length of the working day to the provisions of the applicable laws or of the collective bargain agreement applicable for the sector in question, if the latter affords greater protection for the workers. Manufacturers and suppliers shall not require their employees to work, as a rule of thumb, in excess of 48 hours a week and workers shall be granted at least one day

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			off for every 7 calendar day period on average. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate, pursuant to the provisions of the prevailing regulations in force'. [Code of Conduct for Suppliers, N/A: inditex.com]
A.1.3.AP	Commitment to respect human rights particularly relevant to the sector – vulnerable groups (AP)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commitment to children's rights: The Human Rights Policy indicates: 'Inditex respects children's rights'. See below. [Human rights policy 2016, 12/2016: inditex.com] • Not Met: Expects suppliers to respect these rights: See below. The Policy on Human Rights states: 'All manufacturers and suppliers that work with Inditex shall undertake to respect their employees' Human and Labour Rights, and to involve their business partners and convey to them such principles'. However, no evidence found that the Company is specifically requiring suppliers to follow the specific Company Human Rights policy. [Human rights policy 2016, 12/2016: inditex.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commitment refers to Child Rights Convention/Business Principles: The Human Rights Policy indicates: 'Inditex respects children's rights and rejects child labour, pursuant to the provisions of ILO Convention 138 and in accordance with the minimum working age under the relevant regulations of each country. Thus, the Group does not employ anyone who has not reached the age of 16. Moreover, Inditex advocates the children's right to education, in line with the Children's Rights and Business Principles of the United Nations Children's Fund (UNICEF)'. [Human rights policy 2016, 12/2016: inditex.com] • Not Met: Expects suppliers to respect these rights: The Policy on Human Rights states: 'All manufacturers and suppliers that work with Inditex shall undertake to respect their employees' Human and Labour Rights, and to involve their business partners and convey to them such principles'. Among Labour Human Rights, it is found: 'Inditex respects children's rights and rejects child labour, pursuant to the provisions of ILO Convention 138 and in accordance with the minimum working age under the relevant regulations of each country. Thus, the Group does not employ anyone who has not reached the age of 16. Moreover, Inditex advocates the children's right to education, in line with the Children's Rights and Business Principles of the United Nations Children's Fund (UNICEF)'. The Policy on Human Rights states: 'All manufacturers and suppliers that work with Inditex shall undertake to respect their employees' Human and Labour Rights, and to involve their business partners and convey to them such principles'. However, no evidence found that the Company is specifically requiring suppliers to follow the specific Company Human Rights policy. [Human rights policy 2016, 12/2016: inditex.com]
A.1.4	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Commitment to remedy adverse HRs impacts: The Human Rights Policy indicates: 'Inditex undertakes to play an active role in the promotion of Human Rights, and to work proactively to respect them. This commitment entails preventing or, if appropriate, reducing the negative consequences of its own proceedings on Human Rights. Likewise, it shall do its utmost to prevent or reduce the negative consequences on Human Rights directly related to the proceedings of third parties with whom the Group is engaged in a business relationship'. The 2021 Modern Slavery, Human Trafficking and Transparency in Supply Chain Statement notes: 'Appropriate measures are also taken to prevent, monitor, mitigate or remedy any potential negative consequences and foster positive impacts throughout the entire supply chain'. It contains further information on Corrective Action Plans. The document Supply Chain – Management to Transform the Sector adds: 'Corrective Action Plans, which are developed when non-compliances are detected in social and environmental audits, not only to establish measures to mitigate or remedy them, but also to prevent them from occurring in the future'. However, no formal statement found of a commitment to remedy the adverse impacts on individuals, workers and communities that it has caused or contributed to. Commitments are expected to be placed in Company policy documents. [Human rights policy 2016, 12/2016: inditex.com] & [2021 Modern Slavery, Human Trafficking and Transparency in Supply Chain Statement, N/A: inditex.com] • Not Met: Expects suppliers to make this commitment: The Code of Conduct for Manufacturers and Suppliers states: 'Manufacturers and suppliers shall implement and maintain programmes to set in motion this Code. They shall appoint a senior member of Management who shall be responsible for the implementation and enforcement of this Code'. The Company has provided comments to CHRB regarding this indicator. However, its content has not been found in publicly available sources. No evidence found that it expects its suppliers to commit it to

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			<p>remedy the adverse impacts on individuals and workers and communities that it has caused or contributed to. [Code of Conduct for Suppliers, N/A: inditex.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to collaborate with judicial or non-judicial mechanisms: No policy statement committing it to collaborating with judicial or non-judicial mechanisms to provide access to remedy found. Only policy commitments are considered a suitable source for this indicator. • Not Met: Commitment to work with suppliers on remedy: The Company has provided comments to CHRB regarding this indicator, including information on its Global Framework Agreement between Inditex and IndustriALL; collaboration of Inditex, as for instance MUDEM; Corrective Action Plans. However, this subindicator looks for a explicit policy commitment to work with suppliers to remedy adverse impacts which are directly linked to the Company's operations, products or services found. Moreover, only policy commitments are considered a suitable source for this indicator under CHRB revised approach. [Global Framework Agreement between Inditex and IndustriALL, 2019: industrialunion.org] & [2022 Human Rights Report, 2022: static.inditex.com]
A.1.5	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Zero tolerance of threats/attacks on HRDs: The Policy on Human Rights states: 'Inditex undertakes to respect and promote, within its scope of application, the right to freedom of opinion, information and expression, respecting diversity of opinion and fostering two-way communication with its stakeholders. [...] Inditex undertakes to ensure the security of all the persons with whom it interacts in all its scopes'. However, no evidence found of a commitment to neither tolerate nor contribute to threats, intimidation and attacks (both physical and legal) against human rights defenders. The indicator is looking for evidence that the Company will not retaliate against anyone who oppose a Company's operations or have raised questions about the Company's activities. [Human rights policy 2016, 12/2016: inditex.com] • Not Met: Expects suppliers to make this commitment: See above. The Policy on Human Rights states: 'The enforcement of this Policy, in full or in part, may extend to any natural and/or legal person associated with Inditex, where this may be appropriate to meet its purpose, and practicable on account of the nature of the relationship'. However, no expectation of a commitment for suppliers not to tolerate attacks or intimidation against human rights defenders could be found. [Human rights policy 2016, 12/2016: inditex.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to working with HRDs to create safe and enabling environment

A.2 Board Level Accountability (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Board level responsibility for HRs: The 2021 Modern Slavery, Human Trafficking and Transparency in Supply Chain Statement indicates: 'The Group formed a Sustainability Committee in 2019. This consulting and advisory board committee is responsible for advising the Board on matters within its purview, overseeing and monitoring social and environmental sustainability activity, the areas of the health and safety of products that the Group sells, and on relations with stakeholders in the field of sustainability, including matters relating to the implementation of the Group's Human Rights strategy'. [2021 Modern Slavery, Human Trafficking and Transparency in Supply Chain Statement, N/A: inditex.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Describes HRs expertise of Board member: Regarding the qualifications of Bns Denise Patricia Kingsmill, a Sustainability Committee member, the 2022 Annual Report notes: ‘In 2000 Baroness Kingsmill was awarded a CBE for services to Employment Law and Competition. [...] In 2001 she was invited by the Government to head a task force looking at women’s employment and remuneration in the UK. In 2003 she was appointed Chair of the Department of Trade and Industry’s Accounting for People task force. She headed a second Government enquiry (“Accounting for People”) into how companies should evaluate and measure the contribution of their work forces and specifically as to how they should communicate their progress in this area of “Human Capital Management” to all their stakeholders [...]’. However, although Bns Kingsmill has experience on women’s employment and remuneration and other aspects of workforce, this subindicator looks for a description of the human rights expertise [in a broader sense] of the Board member or Board committee tasked with that governance oversight. The Company also discloses a Board skills matrix, it contains the items of ‘HR, talent and remuneration’ and ‘Sustainability’. However, it is not clear it includes human rights. [2022 Annual Report, 14/03/2023: static.inditex.com] & [Report of the Nomination Committee 2022, 06/06/2022: inditex.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Board member/CEO signal importance of HRs in their communications: In its opening letter to the 2022 Annual Report, the CEO indicates: ‘We reiterated and reinforced our commitment to the United Nations Guiding Principles on Business and Human Rights and to the Global Compact and its principles, and the Sustainable Development Goals’. In a press release on employees with disabilities, the CEO notes: ‘disability inclusion in the workplace is a core component of our commitment to people. Diversity, fairness and inclusion are values we all embrace, values we pursue day-to-day, in order to have an impact within Inditex as well as all around us: our pledge is to design opportunities for everyone. [...] Companies increasingly recognise that their Diversity, Equity & Inclusion efforts must address the inclusion of persons with disabilities to lead to positive and sustainable business changes. The ILO Global Business and Disability Network provides a unique space for enterprises to learn from and support each other on their respective disability inclusion journey’. As for the IndustriALL commitment, he remarks: ‘The protocol signed today, commemorating the 15th anniversary of the Framework Agreement between Inditex and IndustriALL, evidences our determination to strengthen respect for fundamental labour rights across our production chain and marks a fresh milestone in both organisations’ ongoing mission of improving the lives of the women and men who populate it’. However, no communication found where Board members or the CEO clearly signal the Company’s commitment to human rights, discussing why human rights matter to the business or any challenges to respecting human rights encountered by the business. [2022 Annual Report, 14/03/2023: static.inditex.com] & [Inditex and IndustriALL reaffirm commitment with a new protocol_web, 03/10/2022: inditex.com]
A.2.2	Board responsibility	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Process to review HRs strategy at board level: The 2022 Annual Report indicates the Sustainability Committee’s duties: ‘Powers relating to sustainability: (i) to oversee that environmental and social practices of the Company are aligned with the strategy and the policy set by the Company; [...] to oversee monitoring of compliance with Inditex’s Code of Conduct for Manufacturers and Suppliers across the supply chain of products sold by the Group; (iii) to establish that the products that the Company sells comply with product health and safety standards; (iv) to establish and promote compliance by the Company and Group entities with the most exacting policies, regulations and standards in the field of human, labour and environmental rights in any matter that affects workers across the entire supply chain, production processes, product and the store. [...] The Sustainability Committee shall meet at least 3 times a year and each time that its Chair calls it’. See below details of the meetings. [2022 Annual Report, 14/03/2023: static.inditex.com] • Met: Example of HRs issues/trends discussed in last reporting period: It indicates ‘The most relevant proceedings of the Sustainability Committee in 2022 have revolved around the following areas: [...] With regard to Human Rights in the meeting held on 6 June 2022, the committee resolved to give a favourable report to the Inditex Group Modern Slavery, Human Trafficking and Transparency in Supply Chain Statement for FY2021 and submit it to the board of directors, pursuant to the provisions of section 2021 of the UK Modern Slavery Act, the

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			<p>California Transparency in Supply Chain Act and section 14 of the Australian Modern Slavery Act'. With regard to the monitoring of the supply chain, it states: 'it gave a favourable report to the following before raising them to the board: (i) the proposal on the update of the Sustainability Policy and (ii) the approval of a new Community Investment Policy, respectively'. The Sustainability Policy contains the Company's Human Rights provisions. [2022 Annual Report, 14/03/2023: static.inditex.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Meets both requirements under score 1: See above. • Not Met: Describes how affected stakeholders / HRs experts inform board discussions: The 2022 Human Rights Report notes: 'The Group also has a Social Advisory Board, a collegiate body integrated by external independent experts, which advises on human rights, among other issues linked to sustainability'. In a chart, the Board appears to have direct communication with the Board of Directors. The 2022 Annual Report adds: 'Inditex has a Social Advisory Board. It is the Company's permanent external body which acts in an advisory and consultative capacity in matters of social and environmental sustainability. It is made up of persons external and independent of the Group. It arranges and institutionalises dialogue with those spokespersons considered key in the civil society in which we carry out our business model and plays'. However, it is not clear whether members of this board have human rights expertise and the process by which it informs Board's discussion on human rights. [2022 Human Rights Report, 2022: static.inditex.com] & [2022 Annual Report, 14/03/2023: static.inditex.com]
A.2.3	Incentives and performance management	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: At least one board member incentive linked to HRs commitments: The 2021 Annual Report indicates: 'Executive directors' total remuneration comprises different remuneration elements [...] Long-term variable remuneration plans are part of a multi-year framework to ensure that the evaluation is based upon long-term results and that the underlying economic cycle of the Company is considered therein'. The second cycle (2020-2023) of the 2019-2023 Long-Term Incentive Plan (the "2019-2023 Plan"), include a Sustainability index, comprising of 4 indicators, including: 'Percentage of Inditex's suppliers of goods ranked A and B following their social audit. The average of the three years of each cycle is measured'. Specifically: 'The percentage of Inditex's product suppliers with a social ranking of A and B has exceeded 95% in the average of the three years of the cycle'. The former CEO Mr. Isla was also a Board member (last reporting year). [2022 Annual Report, 14/03/2023: static.inditex.com] • Met: Incentive scheme linked to key HRs risks beyond employee H&S: Ranking in social audits depends on checks and monitoring of a number of labour-related topics, beyond health and safety. 'Social audits are conducted periodically and regularly at each supplier and factory in our supply chain to verify compliance with the Code of Conduct'. [2022 Annual Report, 14/03/2023: static.inditex.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria linked to HRs made public: The target Sustainability index (comprising 4 indicators) has the weighting of 10%. The 2022 Annual Report on Remuneration adds: 'Indicator no. 4: concentrating production in suppliers ranked A and B following their social audits'. It then discloses the 'Percentage of concentration of production in suppliers ranked A and/or B following their social audit upon expiry of each cycle of the 2019-2023 Plan' in relation to the 'Level of Incentive (% of maximum incentive)'. For instance, 90% concentration of production in suppliers ranked A and/or B has an equivalent of 50% level of incentive. If the concentration is 94%, the level of incentive is 100%. However, beyond the target related to social audits, it contains three other targets. It is not clear the exact Board remuneration criteria linked to human rights performance. [2022 Annual Report, 14/03/2023: static.inditex.com] & [2022 Annual Report on Remuneration, 14/03/2023: static.inditex.com] • Not Met: Review of other board incentives for coherence with HRs policies: The Remuneration Committee Regulations indicate that the committee shall: 'to regularly review the remuneration policy for directors and senior managers, including share based remuneration systems and the application thereof, verifying that it is consistent with the particular circumstances of the Company and that it is in line with its short, medium and long-term strategy and with market conditions, and considering whether it contributes to the sustainable creation of value and an appropriate enterprise risk management'. The document Proposed resolutions to the AGM 2023 include: 'Sustainability index, comprised of the following 4 indicators for the first cycle of the Plan: [...] People included in the Workers at the

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Centre Strategy 2023-2025: measured as the total number of workers who are part of the programmes of the priority impact areas of social dialogue, living wages, health, respect and resilience of the Workers at the Centre Strategy, for 2023, 2024 and 2025'. However, it is not clear the Company has reviewed other Board performance incentives to ensure coherence with its human rights policy commitment. [Remuneration Committee's Regulations, 05/2022: inditex.com] & [Proposed resolutions to the AGM 2023, 11/07/2023: inditex.com]
A.2.4	Business model strategy and risks	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Board process to review business model and strategy for HRs risks: The 2022 Statement on Non-Financial Information indicates: 'one of the main duties of the Audit and Compliance Committee is to oversee and assess financial and non-financial risks, such as those arising from the Group's actions in relation to its social, environmental and other sustainability practices. The members of the Sustainability Committee, including its Chair, also serve on the Audit and Compliance Committee. The overlapping presence of directors on both committees and the report that the Chair of the Sustainability Committee submits to the Board of Directors regarding the main issues discussed at their respective meetings ensure that the most relevant social and environmental sustainability issues are taken into consideration in the deliberations of the Audit and Compliance Committee, allowing for a better identification of the risks and opportunities associated with these matters. This system of dialogue at different levels within the Organisation, right up to the highest level, helps to better identify the sustainability risks, opportunities and impacts of our commercial operations. In 2022 the Board of Directors assessed the Group's new Sustainability Strategy, presented by the Sustainability Department. This sustainability vision and strategy was already defined in the Group's Sustainability Policy, initially approved by the Board of Directors at its meeting on 14 December 2020'. The 2022 Annual Report on the proceedings of the Sustainability Committee discloses main business transacted in 2022, including: 'New "Workers at the Centre" strategy'. [2022 Statement on Non-Financial Information, 14/03/2023: static.inditex.com] & [Annual report on the proceedings of the Sustainability Committee 2022, 2023: inditex.com] • Not Met: Describes frequency and triggers for reviewing business model: See above. The Company has provided comments to CHRB regarding this indicator including information on the its sustainable governance, Sustainability Policy, the new Sustainability Strategy, the Sustainability Committee [and the frequency it should meet]. However, this subindicator looks for a description of the frequency of and triggers for reviewing its business model or strategy and potential impacts on human rights. [2022 Statement on Non-Financial Information, 14/03/2023: static.inditex.com] & [Annual report on the proceedings of the Sustainability Committee 2022, 2023: inditex.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Met: Example of actions resulting from reviews: The Annual report on the proceedings of the Sustainability Committee indicates the main business transacted in 2022, including: 'New "Workers at the Centre" strategy'. The 2022 Statement on Non-Financial Information notes: 'The strategy is based on the respect and promotion of human rights and on the creation of social value in the community and industry. [...] We work closely with stakeholders to address the shared challenges throughout the supply chain and we stand close to workers to understand their needs and provide them with the necessary tools for their empowerment, participation and wellbeing'. [2022 Statement on Non-Financial Information, 14/03/2023: static.inditex.com] & [Annual report on the proceedings of the Sustainability Committee 2022, 2023: inditex.com]

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Score of 1 on A.1.2.a

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Senior responsibility for HRs implementation and decision making: The 2022 Human Rights Report indicates: 'The Chief Sustainability Officer is a member of the Company's Management Committee. The CSO reports to the CEO, to the Sustainability Committee and, where applicable, to the Audit and Compliance Committee, concerning sustainability, including social, climate-related and product health and safety aspects'. The Human Rights Policy adds: 'Inditex relies on a Committee of Ethics and a Whistle Blowing Channel to ensure compliance with this Policy, and receive and attend to any comments, doubts or complaints regarding its construction, enforcement or compliance'. The Committee of Ethics is composed of The General Counsel and Code Compliance Officer, the Chief Audit Officer, the Chief Sustainability Officer and the Chief Human Resources Officer. [Human rights policy 2016, 12/2016: inditex.com] & [2022 Human Rights Report, 2022: static.inditex.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes day-to-day responsibility for implementing HRs commitments: The 2022 Annual Report indicates that the Sustainability Committee 'liaises directly with the Sustainability Department, which is responsible for defining the Group's sustainability strategy and which reports, at least quarterly, on the degree of achievement of the strategic objectives and the proposals in the areas of human rights, social, environment, and health and safety of our products'. [2022 Annual Report, 14/03/2023: static.inditex.com] • Met: Day-to-day resources and expertise allocation in own operations: See above. In addition to the sustainability department with 5,337 people, the 2022 Human Rights Report indicates: 'the functions of various of the Company's areas include the daily management of potential impacts on human rights throughout the value chain. Sustainability, Regulatory Compliance, Risk Management or Human Rights, among others, develop policies and procedures to integrate the results of the due diligence process and permeate the entire company in practising respect for and promotion of human rights'. [2022 Human Rights Report, 2022: static.inditex.com] & [2022 Annual Report, 14/03/2023: static.inditex.com] • Met: Resources and expertise allocation in supply chain: The 2021 Modern Slavery, Human Trafficking and Transparency in Supply Chain Statement indicates: 'Inditex Group's Sustainability teams are tasked with managing and coordinating all the Group's activities aimed at ensuring compliance with the Code of Conduct for Manufacturers and Suppliers throughout the entire supply chain'. The 2022 Annual Report notes that the 'Total number of persons in the Sustainability team 'in 2022 is: 5,337. [2021 Modern Slavery, Human Trafficking and Transparency in Supply Chain Statement, N/A: inditex.com] & [2022 Annual Report, 14/03/2023: static.inditex.com]
B.1.2	Incentives and performance management	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Senior manager incentives linked to HRs commitments: The 2023 Annual General Meeting Resolution indicates it has approved the 'long-term incentive plan in cash and in shares addressed to members of management, including executive directors and other employees of the Inditex Group [...] up to a maximum number of 750. [...] the Plan has a total duration of 4 years and is divided into 2 separate and independent time cycles. The first cycle of the Plan runs from 1 February 2023 through 31 January 2026. [...] With regard to the first cycle of the plan, the incentive to be awarded to each beneficiary will be based upon the following metrics: [...] Sustainability index, comprised of the following 4 indicators: [...] People included in the Workers at the Centre Strategy 2023-2025: measured as the total number of workers who are part of the programmes of the priority impact areas of social dialogue, living wages, health, respect and resilience of the Workers at the Centre Strategy for 2023, 2024 and 2025. [...] Each metric will be weighted as follows: 25% the Sustainability index'. [Annual General Meeting Resolution 2023, 2023: inditex.com] • Met: Incentive scheme linked to key HRs risks beyond employee H&S: See above. [Annual General Meeting Resolution 2023, 2023: inditex.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria linked to HRs made public: The 2023 Annual General Meeting Resolution indicates: 'Each metric will be weighted as follows: 25% the Sustainability index'. However, beyond the target related to workers who are part of the programmes of the priority impact areas, it contains three other targets. It is not clear the exact Executive remuneration criteria linked to human rights performance. [Annual General Meeting Resolution 2023, 2023: inditex.com] • Not Met: Review of other senior management incentives for coherence with HRs policies: The Remuneration Committee Regulations indicate that the committee shall: 'to regularly review the remuneration policy for directors and senior

Indicator Code	Indicator name	Score (out of 2)	Explanation
			managers, including share based remuneration systems and the application thereof, verifying that it is consistent with the particular circumstances of the Company and that it is in line with its short, medium and long-term strategy and with market conditions, and considering whether it contributes to the sustainable creation of value and an appropriate enterprise risk management'. The document Proposed resolutions to the AGM 2023 include: 'Sustainability index, comprised of the following 4 indicators for the first cycle of the Plan: [...] People included in the Workers at the Centre Strategy 2023-2025: measured as the total number of workers who are part of the programmes of the priority impact areas of social dialogue, living wages, health, respect and resilience of the Workers at the Centre Strategy, for 2023, 2024 and 2025'. However, it is not clear the Company has reviewed other Executive performance incentives to ensure coherence with its human rights policy commitment. [Remuneration Committee's Regulations, 05/2022: inditex.com]
B.1.3	Integration with enterprise risk management	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HRs risks integrated as part of enterprise risk system: The 2022 Annual Report indicates: 'Inditex's Integrated Risk Management System (IRMS) establishes the Group's risk management and control framework. The IRMS, based on the COSO Enterprise Risk Management (ERM) framework, encompasses our entire Group [...] The IRMS entails both financial and nonfinancial risks'. Among its Governance Risks, the Company points out 'Non-compliance': 'The Group is exposed to the risk of non-compliance with its Human Rights Policy and other standards we have established in this regard. In particular, breaches of our Code of Conduct for Manufacturers and Suppliers, defined as the minimum standards of ethical and responsible behaviour to be observed by the manufacturers and suppliers of the products we market. Furthermore, the requisite ESG (environmental, social and governance) performance in the fashion industry is increasing and is based on transparency and traceability'. [2022 Annual Report, 14/03/2023: static.inditex.com] • Met: Provides an example: See above. It also discloses its main mitigation actions regarding this risk: 'Mandatory compliance with the Code of Conduct for Manufacturers and Suppliers by all those who wish to become part of the Group's supply chain. Programme for Compliance with the Code of Conduct for Manufacturers and Suppliers by means of different types of audits of the facilities required for production. The Ethics Line and Ethics Committee (also responsible for the application and interpretation of the Code of Conduct for Manufacturers and Suppliers). Traceability strategy based on a management system whereby each supplier is required to know and share its supply chain data and report the facilities involved in the productions, and an audit process that confirms that production does in fact take place in declared and authorised factories'. [2022 Annual Report, 14/03/2023: static.inditex.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Risk assesment by Audit Committee or independent third party: The 2022 Annual report on the proceedings of the Sustainability Committee indicates: 'At the meeting held on 6 June 2022, the committee resolved to give a favourable report to the Inditex Group Modern Slavery, Human Trafficking and Transparency in Supply Chain Statement for FY2021 and submit it to the board of directors, pursuant to the provisions of section 2021 of the UK Modern Slavery Act, the California Transparency in Supply Chain Act and section 14 of the Australian Modern Slavery Act'. However, this subindicator looks for a description of how it assesses the adequacy of the enterprise risk management system specifically in managing human rights during the Company's last reporting year. The assessment is expected to either be overseen by the Board Audit Committee or conducted by an independent third party. [Annual report on the proceedings of the Sustainability Committee 2022, 2023: inditex.com]
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Score of 1 on A.1.2.a • Not Met: Communicates HRs policies to all workers in own operations: The 2022 Human Rights Report indicates its ongoing process includes: 'Disseminating and raising awareness internally and externally through training and sensitisation in human rights. [...] This culture is communicated both internally to the Company's employees, and externally to suppliers, manufacturers and other stakeholders. [...] Moreover all our people have had access to an online training platform, TRAIN, in which specific courses on Compliance and Diversity & Inclusion, among others, have been provided. The same platform hosts Zara Camp, which offers a number of specific courses on topics relevant to the business model, such as product

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>sustainability or supply chain management, which include and integrate a human rights perspective. It is worth noting that our people also receive a range of trainings when they join the Company, including on sustainability and respect for human rights. [...] We conduct specialised training in human rights, designed specifically for Inditex delivered through online content that covers aspects such as the definition of human rights, their relevance, the relationship between companies and human rights and, in particular, the role of Inditex in respect for human rights, in a journey along the entire value chain. This training, received by key areas of the Company, has been complemented with more specialised interactive and in-person sessions for areas such as sustainability or logistics and distribution'. The 2022 Annual Report notes: '[...] Particularly in the supply chain, training is complemented by our work on responsible purchasing practices, with the aim of aligning commercial teams with our commitment to sustainability and human rights. For example, in 2022, under the umbrella of the Sustainable Fashion School, the commercial and design teams have received training that includes specific topics on human rights and their potential impacts related to the business model'. However, although the Company indicates that it provides training on specific areas related to Human Rights, and that key areas receive special training as well as that newcomers receive training, it is not clear that all workers have access to Human Rights training or that policy commitments are communicated to all workers. The Company has provided comments to CHRB regarding this indicator, including information on the Code of Conduct for Manufacturers and Suppliers. However, this subindicator focuses on the Company's own workers. [2022 Human Rights Report, 2022: static.inditex.com] & [2022 Annual Report, 14/03/2023: static.inditex.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communicates HRs policies to stakeholders: The Code of Conduct for Manufacturers and Suppliers states: 'Manufacturers and suppliers shall communicate the Code to all employees and those in any way involved in the Inditex Supply Chain. A copy of the Code, translated into the local language, shall be displayed in accessible locations to all workers'. The Company has provided comments to CHRB regarding this indicator stating the Inditex's policies and codes are publicly accessible at Inditex's corporate website. However, it is not clear how it actively communicates its policy commitments to affected stakeholders, including local communities and other groups in general. Publishing policies on the website is not considered a direct communication with affected stakeholders. [Code of Conduct for Suppliers, N/A: inditex.com] & [Our Ethical Commitment_web, N/A: inditex.com] • Not Met: Example of how HRs policies are accessible for intended audience: As indicated above, the Code of Conduct for Manufacturers and Suppliers states: 'Manufacturers and suppliers shall communicate the Code to all employees and those in any way involved in the Inditex Supply Chain. A copy of the Code, translated into the local language, shall be displayed in accessible locations to all workers'. The Company has provided comments to CHRB regarding this indicator on its audits and on Corrective Action Plan and possible outcomes and Company involvement with the CAPs. However, the subindicator looks for an example how the Company ensures the form and frequency of the information communicated [its policy commitments] is accessible to its intended audience, including local communities. [2022 Annual Report, 14/03/2023: static.inditex.com] & [Code of Conduct for Suppliers, N/A: inditex.com]
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Meets ILO requirement for suppliers on A.1.2.a • Met: Requires suppliers to communicate HRs policies: The Code of Conduct for Manufactures and Suppliers indicates: 'Manufacturers and suppliers shall communicate the Code to all employees and those in any way involved in the Inditex Supply Chain'. The 2021 Modern Slavery, Human Trafficking and Transparency in Supply Chain Statement indicates: 'Before commencing work for Inditex, all suppliers accept and undertake to meet (and to enforce compliance by the facilities they work with) the Inditex Minimum Requirements, which include compliance with the Inditex Code of Conduct for Manufacturers and Suppliers,- among other policies and standards - which explicitly prohibits slavery and human trafficking and is based on applicable national laws and international standards in the field'. [Code of Conduct for Suppliers, N/A: inditex.com] & [Code of Conduct for Suppliers, N/A: inditex.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes how HRs policies are contractual/binding for suppliers: The 2022 Annual Report indicates: 'It should be noted that all suppliers, in order to be part of

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>our supply chain, must first accept all the IMRs (Inditex Minimum Requirements) that apply to them. The IMRs are made up of a series of documents (such as the Code of Conduct for Manufacturers and Suppliers, the Policy on Human Rights or the Traceability Requirements for Suppliers and Manufacturers) where the social, environmental and product health and safety standards, among others, with which our suppliers and manufacturers must comply, are set out'. The 2021 Modern Slavery, Human Trafficking and Transparency in Supply Chain Statement adds: 'The main framework governing the relationship with all our suppliers is our Code of Conduct for Manufacturers and Suppliers (approved in 2001, updated most recently in 2014 and available on our corporate website). This document establishes the mandatory standards in matters of labour rights, product health and safety and environmental aspects'. [2022 Annual Report, 14/03/2023: static.inditex.com] & [2021 Modern Slavery, Human Trafficking and Transparency in Supply Chain Statement, N/A: inditex.com]</p> <ul style="list-style-type: none"> • Met: Requires suppliers to cascade contractual/binding HRs policies to its suppliers: The 2021 Modern Slavery, Human Trafficking and Transparency in Supply Chain Statement indicates: 'Before commencing work for Inditex, all suppliers accept and undertake to meet (and to enforce compliance by the facilities they work with) the Inditex Minimum Requirements, which include compliance with the Inditex Code of Conduct for Manufacturers and Suppliers'. Manufacturers and suppliers shall not assign any work to third parties without the prior written authorization of Inditex. Those who outsource any work shall be responsible for the enforcement of the Code by these third parties and their employees'. [2021 Modern Slavery, Human Trafficking and Transparency in Supply Chain Statement, N/A: inditex.com] & [Code of Conduct for Suppliers, N/A: inditex.com]
B.1.5	Training on Human Rights	1.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Score of at least 1 on A.1.2.a • Met: Describes how workers are trained on HRs policy commitments: The 2022 Human Rights Report indicates its ongoing process includes: 'Disseminating and raising awareness internally and externally through training and sensitisation in human rights. [...] This culture is communicated both internally to the Company's employees, and externally to suppliers, manufacturers and other stakeholders. [...] Moreover all our people have had access to an online training platform, TRA!N, in which specific courses on Compliance and Diversity & Inclusion, among others, have been provided. The same platform hosts Zara Camp, which offers a number of specific courses on topics relevant to the business model, such as product sustainability or supply chain management, which include and integrate a human rights perspective. It is worth noting that our people also receive a range of trainings when they join the Company, including on sustainability and respect for human rights. [...] We conduct specialised training in human rights, designed specifically for Inditex delivered through online content that covers aspects such as the definition of human rights, their relevance, the relationship between companies and human rights and, in particular, the role of Inditex in respect for human rights, in a journey along the entire value chain. This training, received by key areas of the Company, has been complemented with more specialised interactive and in-person sessions for areas such as sustainability or logistics and distribution'. [2022 Human Rights Report, 2022: static.inditex.com] • Met: Trains relevant managers including procurement on HRs: The 2021 Modern Slavery, Human Trafficking and Transparency in Supply Chain Statement indicates: 'employees undertake specific training depending on their roles and responsibilities. Training in this regard is essential for our purchasing teams due to the impact of their decisions on the sustainability of our products and supply chain. Such training covers responsible purchasing practices and their influence on employee rights. In 2021, 15,600 employees received sustainability training'. [2021 Modern Slavery, Human Trafficking and Transparency in Supply Chain Statement, N/A: inditex.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2.a • Met: Meets both requirements under score 1 • Met: Trains suppliers to meet HRs commitments: The 2021 Modern Slavery, Human Trafficking and Transparency in Supply Chain Statement indicates: 'Training and raising awareness among suppliers are also key to make progress towards the joint continuous improvement of the supply chain from the perspective of human and labour rights. Inditex's Sustainability teams advise suppliers through constant communication and training to share the Group's values, to raise awareness of respect and promotion of Human Rights and workers' wellbeing'. The 2022 Workers at the Centre Report notes: 'The responsible management of our

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>purchases in the supply chain begins by supporting our suppliers in their efforts to improve their social performance and in complying with our requirements and procedures. Training is an essential element in raising awareness of our standards and our Code of Conduct for Manufacturers and Suppliers. [2021 Modern Slavery, Human Trafficking and Transparency in Supply Chain Statement, N/A: inditex.com] & [2022 Workers at the Centre Report, 2023: inditex.com]</p> <ul style="list-style-type: none"> • Not Met: Discloses % suppliers trained: The 2022 Workers at the Centre Report notes: ‘The responsible management of our purchases in the supply chain begins by supporting our suppliers in their efforts to improve their social performance and in complying with our requirements and procedures. Training is an essential element in raising awareness of our standards and our Code of Conduct for Manufacturers and Suppliers. In addition, we provide more specific training, either due to needs detected in our regular assessments, due to the interest expressed by the suppliers themselves, or on our own initiative. We therefore provide training on issues such as gender equality, diversity, freedom of association, safety in the workplace or occupational Health’. It adds: ‘1,042 suppliers trained in 2022’. However, it is not clear the percentage it represents. [2022 Workers at the Centre Report, 2023: inditex.com]
B.1.6	Monitoring and corrective actions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Score of at least 1 on A.1.2.a • Not Met: Monitors implementation of HRs policy commitments across global ops and supply chain: The 2022 Annual Report indicates: ‘Once a factory passes the pre-assessment, social audits are conducted periodically and regularly at each supplier and factory in our supply chain to verify compliance with the Code of Conduct. [...] These audits can be carried out by internal or external auditors, but are always unannounced and include a site visit to assess aspects such as wage rates, working hours, health and safety conditions, among other requirements pertaining to the Code of Conduct. [...] In addition to our own methodology, verifications are also carried out following the methodology of the Social & Labour Convergence Program (SLCP) initiative, of which Inditex has been a member since its inception. [...] Based on the social audits, suppliers and manufacturers are rated in accordance with their degree of compliance with the Code of Conduct’. Regarding its own operations, the Company reports on different actions it takes: ‘within the Human Resources Team, the Department of Diversity, Equality and Inclusion ensures compliance with the Diversity and Inclusion Policy, and fosters training initiatives and programmes in this regard within the Group. Inditex also has an Ethics Committee and an Ethics Line to ensure compliance with this Policy. [...] Accordingly, since 2018 we have appointed Diversity Champions among our staff in the various subsidiaries. Their mission is to act as diversity and inclusion coordinators in their countries and workplaces to ensure that our Diversity and Inclusion Policy is implemented, as well as to contribute ideas and projects that feed into our strategy’. It carries out a wage parity analysis: ‘The outcome of the analysis carried out in 2022 shows wage parity between men and women in Inditex’. The Occupational Health and Safety Policy adds: ‘Inditex regularly reviews and updates its OH&S management system, ensuring that it is implemented at every Group level and disseminated by means of a training and awareness-raising plan. Every staff member is responsible for such system, irrespective of their roles and duties’. However, although the Company indicates it takes different analysis, the Company is expected to description how it monitors the implementation of its human rights policy commitment across its own global operations. No further evidence found. [2022 Annual Report, 14/03/2023: static.inditex.com] • Met: Discloses % of supply chain monitored: The 2022 Annual Report indicates: ‘In 2022, we worked with a total of 1,729 direct suppliers located in 50 markets who, in turn, used 8,271 factories to make our products, employing more than three million people’. Also, ‘In 2022, a total of 5,955 social audits were performed on factories in our supply chain in line with Inditex’s own methodology. [...] Thanks to the efforts internally devoted on the technological sphere, which allow us an integration of our systems and the SLCP [Social & Labour Convergence Program] Gateway, 882 have been successfully integrated at Inditex systems and therefore substitute the audits performed with our own methodology. Therefore, in addition to those carried out using our own methodology, a total of 6,837 social audits were conducted at factories in our supply chain’. [2022 Annual Report, 14/03/2023: static.inditex.com] • Not Met: Describes how workers are involved in monitoring: The document Supply chain: management to transform the sector describes different types of interviews that take place during the social audit, including Individual, confidential and anonymous interviews with Workers; Group interviews. However, although the

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Company discloses different examples of how workers in their supply chain can be heard, this subindicator looks for a description of how the Company’s workers are involved in carrying out the monitoring process. [Supply chain - management to transform the sector, N/A: inditex.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2.a • Met: Describes corrective actions process: The 2022 Annual Report indicates: ‘we believe in continuous improvement as a key to advancing towards our goals and strategies. [...] One of Inditex's main tools for this purpose is the Corrective Action Plan (CAP), in which our teams support and collaborate with suppliers to correct and prevent noncompliance. These plans can be devised by Inditex teams alone or in collaboration with other NGOs. In the most sensitive cases—classified as being ‘subject to CAP’—the plan lasts approximately six months’. The 2021 Modern Slavery Statement adds: ‘Each audit immediately triggers a Corrective Action Plan that identifies the actions required by the supplier or the manufacturer to improve their compliance with the Code of Conduct for Manufacturers and Suppliers, as well as the time frame to implement them. These timeframes vary dependent on their severity and impact on workers’ rights. [...] Corrective Action Plans mainly target: The establishment of measures aimed at mitigating and or remedying potential non-compliances with the Code of Conduct for Manufacturers and Suppliers; and prevention, to avoid further breaches in the future. With regard to the most sensitive aspects of the Code of Conduct for Manufacturers and Suppliers, the duration of the Plan is approximately six months. Once this period is over, a new social audit is carried out to assess the degree of implementation of the corrective measures carried out’. [2022 Annual Report, 14/03/2023: static.inditex.com] & [2021 Modern Slavery, Human Trafficking and Transparency in Supply Chain Statement, N/A: inditex.com] • Met: Discloses findings and number of correction action processes: The 2021 Modern Slavery, Human Trafficking and Transparency in Supply Chain Statement indicates: ‘570 Corrective Action Plans were conducted in 2021, of which 294 were carried out in factories ranked as “Subject to CAP” and 276 in factories with other rankings’. The 2022 Annual Report discloses the results of its audits according to the different classifications of degrees of compliance and percentage of compliance with the Code of Conduct in the active factories of suppliers with purchases in 2022 by continent. It also discloses classification of suppliers according to their business relationship with Inditex. [2022 Annual Report, 14/03/2023: static.inditex.com] & [2021 Modern Slavery, Human Trafficking and Transparency in Supply Chain Statement, N/A: inditex.com]
B.1.7	Engaging and terminating business relationships	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HRs performance affects selection suppliers: The 2022 Annual Report indicates: ‘So as to ensure that only those that meet our social and environmental standards belong to our supply chain, we carry out an initial verification of compliance with our requirements by all new suppliers and manufacturers, through pre-assessment audits before they even commence their business relationship with us. In this pre-assessment process, we check that they adhere to our Code of Conduct and only those that are ranked as approved may receive orders from Inditex’. The Code include the Company’s Human Rights requirements. [2022 Annual Report, 14/03/2023: static.inditex.com] • Met: HRs performance affects continuation supplier relationships: The 2022 Annual Report indicates: ‘At Inditex we believe that responsible purchasing management implies accompanying our suppliers in improving their social and environmental performance. However, our commitment to compliance with our standards entails a zero tolerance policy with those who do not show a willingness to improve, so that if, once the plan has been completed, the verification audit still reveals serious non-compliance, the factory or supplier will be blocked and will not be able to continue working for Inditex’. [2022 Annual Report, 14/03/2023: static.inditex.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Works with suppliers to meet HRs requirements: The 2021 Modern Slavery, Human Trafficking and Transparency in Supply Chain Statement indicates: ‘Training and raising awareness among suppliers are also key to make progress towards the joint continuous improvement of the supply chain from the perspective of human and labour rights. Inditex’s Sustainability teams advise suppliers through constant communication and training to share the Group’s values, to raise awareness of respect and promotion of Human Rights and workers’ wellbeing’. The 2022 Human Rights Report adds: ‘we provide training to suppliers in topics such as gender equality, social dialogue, health and safety issues’. [2022 Human Rights Report,

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.8	Approach to engagement with affected stakeholders	1.5	<p>2022: static.inditex.com] & [2021 Modern Slavery, Human Trafficking and Transparency in Supply Chain Statement, N/A: inditex.com]</p> <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes how workers and communities identified and engaged in the last two years: The 2022 Annual Report defines its stakeholder engagement strategy: Identification - 'Identification of all the stakeholders that may have dealings with Inditex throughout the value chain and in the environment in which we operate'. Prioritisation – 'Classification and determination of priority stakeholders on our business model and value chain. Definition of a strategy: 'A specific strategy is created for each stakeholder based on their characteristics and needs. Specific goals and commitments are defined, as well as the tools for dialogue to be used with each one'. 'Our stakeholders are those entities or groups that are related to Inditex, both throughout our value chain and in the communities in which we carry out our activity and which, at the same time, have the capacity to influence our Company with their decisions and opinions. In this regard, we identify and group our stakeholders according to their link to our business model. Thus, our main stakeholders are: customers, employees, suppliers, shareholders, the community as a whole and the environment (represented by various environmental organisations)'. As an example of recent engagement, the 2022 Workers at the Centre Report notes: 'With the support of MUDEM, in 2022 we were able to reach out to 107 refugee and migrant workers in Türkiye and examine their working conditions in 30 factories. Based on the needs observed, 85 workers took part in a remediation plan'. [2022 Annual Report, 14/03/2023: static.inditex.com] & [2022 Workers at the Centre Report, 2023: inditex.com] • Met: Provides two examples of engagement with stakeholders: the 2022 Workers at the Centre Report notes: 'With the support of MUDEM, in 2022 we were able to reach out to 107 refugee and migrant workers in Türkiye and examine their working conditions in 30 factories. Based on the needs observed, 85 workers took part in a remediation plan'. It also reports that 'A project on workers' preferences regarding their working and social conditions was completed in 2022 in direct collaboration with researchers and professors from the Universities of Toronto and Oxford. This project directly involved 2,505 workers in 50 factories in our supply chain in Morocco (20,671 workers). They were surveyed in order to learn first-hand what aspects they value about a job and to what extent, so as to guide potential interventions and actions aimed at improving their well-being'. In addition, as part of social audits, a Company document indicates that 'the auditors may speak informally to workers either on a one-to-one basis at their posts or during their breaks, but they must always conduct interviews in a setting in which workers feel able to speak openly and honestly. neither the managers of the facilities nor any supervisors are allowed to be present during the interviews with workers [...] the various kinds of interviews that are carried out are as follows: Individual, confidential and anonymous interviews with workers: conducted in all social audits. A representative number of workers in proportion to the size of the workforce must be interviewed. Group interviews (optional): groups must comprise persons belonging to the same area and, if topics such as harassment or discrimination are being discussed, priority is given to speaking groups comprising workers of the same gender or group [...]'. [2022 Human Rights Report, 2022: static.inditex.com] & [2022 Workers at the Centre Report, 2023: inditex.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HRs issues: The 2022 Annual Report provides information on its 2022 materiality analysis, which includes human rights. However, as indicates, it performed to 'understand the needs and expectations of our stakeholders', however, this subindicator focuses on stakeholders whose human rights have been or may be affected by its activities. The 2022 Workers at the Centre Report includes a series of interviews gathering the views and input of different stakeholders, and feedback from the different programmes it has in place. Although the Company provides examples interviews with stakeholders, the Company is expected to provide a summary analysis of the input/views given by affected stakeholders on human rights issues during engagements. No further evidence found. [2022 Annual Report, 14/03/2023: static.inditex.com] & [2022 Workers at the Centre Report, 2023: inditex.com] • Met: Describes how stakeholders views influenced company's HRs approach: The 2022 Workers at the Centre Report notes: 'As part of the process, we have updated our due diligence exercise. This is an ongoing process in which we have updated the exercise of identifying and prioritising with regard to human rights to focus on the Priority Impact Areas of the new Workers at the Centre strategy. As a basis for the exercise, various internal and external sources of information have been

Indicator Code	Indicator name	Score (out of 2)	Explanation
			analysed, such as internal surveys, interviews with key partners such as IndustriALL or the International Labour Organization, information relating to audits of suppliers in the supply chain, analysis of legislation, trends or risk reports on human rights, etc. [...] As a result of the exercise, an evolution of the Priority Impact Areas has been carried out in comparison with the previous strategy, incorporating all the potential impacts identified and subsequently prioritised. For this new strategy, impacts related to the environment and climate change have been incorporated more directly, ensuring a holistic perspective on respect for human rights, and incorporating aspects such as migration and climate change, just transition and the future of work'. [2022 Workers at the Centre Report, 2023: inditex.com]

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes process of identifying risks in own operations: The 2022 Human Rights Report indicates: 'In keeping with the Guiding Principles, we extend the human rights strategy throughout the entire value chain, which means identifying and prioritising potential impacts to incorporate the findings into our activities. The design of these processes involves all the key areas of the Company, such as Human Resources and Risk Management, and it is constantly reviewed and updated. In this regard, the various processes are undertaken in the understanding of what the potential impacts are, what tools are currently in place to prevent or mitigate them, and how these tools might be continuously enriched or added to'. [2022 Human Rights Report, 2022: static.inditex.com] • Met: Describes process for identifying risks in business relationships: The 2022 Human Rights Report indicates: 'Due to our business model, our supply chain is one of the most critical elements of our value chain, which requires a special focus on the promotion of and respect for workers' human rights. To achieve this, we rely on our strategy 'Workers at the Centre' strategy. Its aim is to generate a positive impact on the workers of our supply chain as the main beneficiaries of its programmes and projects. In 2018, we conducted a due diligence process, underpinned by the organization Shift (experts in the field), through which the main potential risks in connection with human rights were identified, creating heat maps for each of our clusters and implementing the principles of severity and likelihood'. [2022 Human Rights Report, 2022: static.inditex.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes global risk identification system incl. stakeholder consultation: See above. The due diligence process in its supply chain is 'underpinned by the organization Shift (experts in the field)'. The 2022 Annual Report indicates its key elements for due diligence, including: 'Cooperation and collaboration are essential components of the due diligence process. Thus, there is no overstating the key importance of the relationships we forge with international organisations and NGOs, among other experts in the field and who support us in developing specific projects, training and creating and implementing our strategies. A clear example of this is our partnership with Shift, a leading centre and promoter of the Guiding Principles on Business and Human Rights. [...] We also highlight our partnerships with the International Labour Organization, the UNI Global Union, IndustriALL Global Union and the UN Global Compact'. Also: '[an] important mechanism is the one established under the umbrella of our Global Framework Agreement with the international trade union federation IndustriALL Global Union. Thanks to the Global Framework Agreement, in force since 2007 and whose fifteenth anniversary took place in 2022, we reach out to workers in the supply chain through their representatives to promote social dialogue. The aim of the Framework Agreement is "to guarantee respect for human rights in the social and labour environment by promoting respect for labour standards throughout the Inditex supply chain"'. The report also indicates that 'This due diligence process [in its supply chain] is regularly reviewed in order to identify potential new human rights risks and adapt our strategy to prevent and remedy them. As a result of this process, we created Priority Impact Areas into which the strategy is structured, encompassing the issues identified'. [2022 Human Rights Report, 2022: static.inditex.com] & [2022 Annual Report, 14/03/2023: static.inditex.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Describes how risk identification system is triggered by new circumstances: The 2020 Annual Report states: 'Our Human Rights' due diligence process is under constant review thanks to the information and interaction with our stakeholders and our sustainability teams on the ground. Proof thereof is the adaptation in 2020 of our programmes and projects, for the purpose of minimising the impact of the pandemic on our people and on the workers in the supply chain, principally in areas like occupational health and safety'. [Annual Report 2020, 2021: static.inditex.com] • Not Met: Describes risks identified in relation to new circumstances: The Company has provided comments to CHRB regarding this indicator, including a description of risks that materialised over the course of the year, for instance: 'Türkiye and Syria are under the effects of the catastrophic earthquakes and the effects of COVID-19. However, this indicator looks for a description of the human rights risks identified following these new circumstances (or other such as new country operations, new challenges, change in political context or other factors). [2022 Annual Report, 14/03/2023: static.inditex.com]
B.2.2	Assessing human rights risks and impacts	1.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes assessment process and discloses salient HRs risks: The 2022 Human Rights Report indicates: 'In keeping with the Guiding Principles, we extend the human rights strategy throughout the entire value chain, which means identifying and prioritising potential impacts to incorporate the findings into our activities. The design of these processes involves all the key areas of the Company, such as Human Resources and Risk Management, and it is constantly reviewed and updated. In this regard, the various processes are undertaken in the understanding of what the potential impacts are, what tools are currently in place to prevent or mitigate them, and how these tools might be continuously enriched or added to'. However, no further details found on the process to assess what are the salient issues, including how relevant factors are taken into account, such as geographical, economic, social or other. The Company has provided comments to CHRB regarding this indicator, including information on its clusters, however, they seem to work in the context of manufacturers and suppliers and this subindicator focuses on risk assessment of its own operations. [2022 Human Rights Report, 2022: static.inditex.com] & [2022 Workers at the Centre Report, 2023: inditex.com] • Met: Describes how process applies to supply chain: The 2022 Human Rights Report indicates: 'our supply chain is one of the most critical elements of our value chain, which requires a special focus on the promotion of and respect for workers' human rights. To achieve this, we rely on our strategy 'Workers at the Centre' strategy. [...] In 2018, we conducted a due diligence process, underpinned by the organization Shift (experts in the field), through which the main potential risks in connection with human rights were identified, creating heat maps for each of our clusters and implementing the principles of severity and likelihood. This due diligence process is regularly reviewed in order to identify potential new human rights risks and adapt our strategy to prevent and remedy them. As a result of this process, we created Priority Impact Areas into which the strategy is structured, encompassing the issues identified'. The 2022 Workers at the Centre Report notes: 'Being close to our manufacturers and suppliers is essential to be able to understand their needs and determine the challenges we will face together. We want to be on the ground and understand the real situation of the countries where our supply chain is located. That is why at Inditex, we have created spaces for dialogue and collaboration that we call clusters. In these clusters, working together is a process of continuous support and accompaniment. We have 12 clusters in Spain, Portugal, Morocco, Türkiye, India, Bangladesh, Pakistan, Vietnam, China, Cambodia, Argentina and Brazil. They represent 98% of our suppliers' production. Each cluster brings together local professionals with extensive experience in the field of sustainability. They are multidisciplinary teams combining a wide range of skills and know-how and they stay in direct contact with suppliers, workers, trade unions, NGOs, local and national authorities, international organisations and academic institutions, among others'. [2022 Human Rights Report, 2022: static.inditex.com] & [2022 Workers at the Centre Report, 2023: inditex.com] • Met: Public disclosure of results of HRs risk assessment: Regarding its supply chain due diligence process, it indicates: 'seven Priority Impact Areas identified through a due diligence process. These areas are: Worker Participation; Living Wages; Gender, Diversity and Inclusion; Occupational Health and Safety; Protection of Migrants and Refugees; Social Protection; and Protection of Labour Rights in the Production of Raw Materials'. [2022 Annual Report, 14/03/2023: static.inditex.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Met: Describes how assessment involved affected stakeholders: The 2022 Workers at the Centre Report notes: ‘During 2022, we have been working on developing the continuation of the [Workers at the Centre 2023-2025] strategy. [...] As part of the process, we have updated our due diligence exercise. This is an ongoing process in which we have updated the exercise of identifying and prioritising with regard to human rights to focus on the Priority Impact Areas of the new Workers at the Centre strategy. As a basis for the exercise, various internal and external sources of information have been analysed, such as internal surveys, interviews with key partners such as IndustriALL or the International Labour Organization, information relating to audits of suppliers in the supply chain, analysis of legislation, trends or risk reports on human rights, etc. The process, carried out in accordance with the Guiding Principles on Business and Human Rights, involved all sustainability areas, local cluster teams, and other company areas and was accompanied by Shift’. [2022 Workers at the Centre Report, 2023: inditex.com]
B.2.3	Integrating and acting on human rights risks and impact assessments	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes system to prevent, mitigate and remediate HRs issues: The ‘Worker at the Centre’ does not seem to apply to its own business. Regarding its due diligence process, the 2022 Human Rights Report indicates: ‘the various processes are undertaken in the understanding of what the potential impacts are, what tools are currently in place to prevent or mitigate them, and how these tools might be continuously enriched or added to’. The Company has provided comments to CHRB regarding this indicator, including information on: its ethics line, the cases processed by the Ethics Committee, Corrective Action Plans for manufacturers and suppliers non-compliances. However no description of its global system to prevent, mitigate and remediate its salient human rights issues found. It subindicator focuses on the Company's own operations. [2022 Human Rights Report, 2022: static.inditex.com] & [Ethics Line Procedure, 05/2023: inditex.com] • Met: Describes how global system applies to supply chain: The Company indicates: ‘Inditex has sound policies, tools and practices for sustainable supply chain management. Their implementation over the years has allowed us to identify workers’ needs in the various geographical areas where we make our products and to develop a strategy that puts the "Worker at the Centre". The strategy is based on the respect and promotion of human rights and on the creation of social value in the community and Industry. [...] 2022 was the year of completion of the current cycle of the Workers at the Centre strategy. Over the last four years, we have worked in the development of tools, projects and partnerships to promote decent work and sustainable productive environments. It discloses Key characteristics of the Workers at the Centre strategy, including: From compliance to commitment; Culture of collaboration; Integration in the business model; Supporting our suppliers. It also discloses various actions taken for each of its seven Priority Impact Areas identified in its supply chain. [2022 Human Rights Report, 2022: static.inditex.com] • Met: Example of actions decided on at least 1 salient HRs issue: The Company discloses various examples of actions taken to address Priority Impact Areas. For instance, regarding living wages: ‘a) Promoting collective bargaining Our strategy is based on the principle that living wages and, in general, decent working conditions are those that result from collective bargaining and collective agreements between employers and workers through their freely chosen representatives. This approach is also that of the ACT initiative, which provides a framework for all stakeholders to work towards securing collective bargaining agreements at industry level. This vision is further strengthened through our Global Framework Agreement with IndustriALL Global Union, which is one of the most effective instruments to implement our living wage strategy. Projects implemented in 2022; Collaboration with ACT (Bangladesh, Cambodia and Türkiye). b) Responsible purchasing practices Responsible purchasing practices can help create an environment that is conducive to improving working conditions, wages and benefits for workers in the supply chain. Mindful of this, as ACT members since 2018 we have signed up to five commitments in relation to purchasing practices. To implement these commitments and help our buyer teams make responsible purchasing decisions, we train them to adopt best practices and we develop and provide them with management systems to measure the sustainability performance of each supplier and factory [...]. [2022 Annual Report, 14/03/2023: static.inditex.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Describes how stakeholders involved in decisions about actions taken: The Company has provided comments to CHRB regarding this indicator, including information on its collaboration with MUDEM: 'In collaboration with MUDEM, remediation plans in Türkiye start with a detailed assessment of the working and living conditions of refugee and migrant workers through individual meetings, in order to understand their needs. In addition to addressing the workers' needs, specific actions are also considered to improve their living conditions if any vulnerability or violation of basic human rights is detected. [...] With the support of MUDEM, in 2022 we were able to reach out to 107 refugee and migrant workers in Türkiye and examine their working conditions in 30 factories. Based on the needs observed, 85 workers took part in a remediation plan'. However, although it has reach out to refugee and migrant workers, it is not clear how affected stakeholders are involved in decisions making. The Company is expected to describe its system [rather than an example] of how it involves affected stakeholders in the in decisions about the actions to take in response to its salient human rights issues. [2022 Workers at the Centre Report, 2023: inditex.com]
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes system for evaluation effectiveness of actions: The Company's 'worker at the centre' programme conform the Company's 'Strategic Plan 2019-2022'. Each programme has a set of key indicators to measure the performance of the initiatives, the strategy pursued, alliances and partnerships and detailed information on actions taken. [2022 Annual Report, 14/03/2023: static.inditex.com] • Met: Example of lessons learned from evaluation effectiveness of actions: Regarding the outcomes of it project 'Towards an inclusive workplace for refugees' [part of Workers at the Centre Strategy], the Company notes: 'In 2022, the CommIn online training platform was presented, bringing together representatives from Inditex, ASAM, suppliers and factories, and the implementation phase of the project began. In May 2022, the targets for participation and completion of the training were reached and visits were made to factories to measure the results of the project's goals in relation to the platform through focus groups and in-depth interviews [results are summarised in the report with indicators, goals and achievements]. During the final assessment process, both workers and employers positively rated the existence of training that favours workplace adaptation. [...] The most important effect of the training modules has been to accelerate the process of cohesion in the workplace, to help eliminate prejudices against different cultures and to fill gaps in knowledge about workers' rights. The elimination of prejudices and misinformation, especially among Turkish workers, was the main reason for strengthening intercultural communication. In fact, Turkish workers stated that they understood that the life of refugees/migrants in Türkiye was not as easy as they thought it was before the training sessions, and that the latter had given them a better understanding of their situation. They also stated that the training had been beneficial in recognising and eliminating their prejudices and that, as a result, they had begun to communicate more in their workplace, in some cases moving this beyond the workplace and into their social lives. Meanwhile, refugee/migrant workers said that after the training they felt more comfortable in their workplace and better understood by Turkish workers'. The Company discloses outcomes of different projects carried out. Overall, regarding the Workers at the Centre Strategy, it indicates: 'During 2022, we have been working on developing the continuation of the strategy. The lessons learned in recent years and the knowledge of the supply chain have allowed us to incorporate best practices in this new stage with the aim of moving towards transformation both in the lives of the people who form part of the supply chain, in their communities, and in the industry as a whole. [...] As a result of the exercise, an evolution of the Priority Impact Areas has been carried out in comparison with the previous strategy, incorporating all the potential impacts identified and subsequently prioritised. For this new strategy, impacts related to the environment and climate change have been incorporated more directly, ensuring a holistic perspective on respect for human rights, and incorporating aspects such as migration and climate change, just transition and the future of work. We will also be reinforcing the focus on vulnerable groups, such as women, migrants, people with disabilities or workers involved in the production of raw materials, etc., ensuring transversality across all Priority Impact Areas'. [2022 Workers at the Centre Report, 2023: inditex.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Meets all requirements under score 1: See above. • Met: Involves stakeholders in evaluation effectiveness of actions: The Company discloses, for each Priority Area, different stakeholders involved. In some cases, affected stakeholders are found, as for instance in the case of Collaboration on the

Indicator Code	Indicator name	Score (out of 2)	Explanation
			ground with IndustriALL and its local affiliates. Regarding its commitment to the Global Framework Agreement, it indicates: 'a new protocol was signed on this 15th anniversary that fosters social dialogue by establishing new mechanisms that strengthen the role of local trade unions and advance towards a better understanding of supply chain workers' needs. A new procedure for access to work centres has also been devised, which aims to further the knowledge and monitoring of working conditions in the factories of the Inditex supply chain'. [2022 Annual Report, 14/03/2023: static.inditex.com]
B.2.5	Communicating on human rights impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Provides two examples of comms with stakeholders: The Company has provided comments to CHRB regarding this indicator, including information on how it has reached out to refugee and migrant workers in Türkiye. However, although the Company provides examples of engagement with different stakeholders, this indicator looks for two examples demonstrating how it communicates with affected stakeholders regarding specific human rights impacts raised by them or on their behalf. It focuses on how the Companies ensure meaningful information reaches affected stakeholders, how it responds, in communication terms, to issues raised by stakeholders and about their access to those communications. [2022 Workers at the Centre Report, 2023: inditex.com] Score 2 <ul style="list-style-type: none"> • Not Met: Describes challenges to effective comms and how it is working to address them: The Company has provided comments to CHRB regarding this indicator, including information on: a project on workers preferences regarding their working and social conditions completed in 2022 in direct collaboration with researchers and professors from the universities of Toronto and Oxford and the signing of the Protocol for the implementation of the Global Framework Agreement which promotes social dialogue through the establishment of new mechanisms that strengthen the role of local trade unions and move towards a better understanding of the needs of workers in our supply chain. However, this subindicator looks for description of any challenge to effective communication it has identified and how it is working to address them, in cases were affected stakeholders have raised concerns. [2022 Workers at the Centre Report, 2023: inditex.com]

C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s) for workers	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all workers: The 2022 Human Rights Report indicates: 'Our main grievance mechanism is the Ethics Line, which is available both to Inditex employees and to manufacturers, suppliers or third parties with a direct relationship or a legit commercial or personal interest'. The Ethics Line Procedure adds the mechanism can be accessed through an email address or ordinary post. [2022 Human Rights Report, 2022: static.inditex.com] & [Ethics Line Procedure, 05/2023: inditex.com] Score 2 <ul style="list-style-type: none"> • Met: Grievance mechanism available in appropriate languages and workers made aware: The 2020 Annual Report indicates: 'All our employees adhere to the Code of Conduct and Responsible Practices and receive specific training on this at the beginning of their working relationship with the Group. [...] We carry out training on a regular basis, in person or online, aimed at groups that, either due to their position and responsibility, or whether due to the type of activity they perform, are exposed to a greater risk of committing violations with regard to compliance. [...] At Inditex, we also implement various internal communication and dissemination initiatives for our employees, including: (i) placement of posters on the Code of Conduct and the Ethics Channel, located within the stores of the different chains and markets, directly accessible in the local language, via a QR code, (ii) publication of information leaflets online on INET and (iii) other communication and awareness actions (ethics/integrity sessions, push notifications, etc.)'. [Annual Report 2020, 2021: static.inditex.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Describes how workers in supply chain access grievance mechanism: The Code of Conduct for Manufactures and Suppliers indicates: 'in order to ensure the enforcement of the Code of Conduct for Manufacturers and Suppliers, the Committee of Ethics can act at its own initiative or following a formal complaint made in good faith by a manufacturer, supplier or other interested third party that might have any direct relationship or commercial or professional interest with Inditex. To this end, any notices given pursuant to the provisions of this Code, either reports of any breach or enquiries regarding the Code's interpretation or application can be addressed directly to the Committee of Ethics via': post, email and fax. [Code of Conduct for Suppliers, N/A: inditex.com] • Met: Expects suppliers to convey expectation to their suppliers: See above. Suppliers are expected to enforce compliance to this Code down their supply chain [see B.1.4.b]. [Code of Conduct for Suppliers, N/A: inditex.com] & [2021 Modern Slavery, Human Trafficking and Transparency in Supply Chain Statement, N/A: inditex.com]
C.2	Grievance mechanism(s) for external individuals and communities	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all external individuals and communities: The 2022 Human Rights Report indicates: 'Our main grievance mechanism is the Ethics Line, which is available both to Inditex employees and to manufacturers, suppliers or third parties with a direct relationship or a legit commercial or personal interest'. The Ethics Line Procedure adds the mechanism can be accessed through an email address or ordinary post. [2022 Annual Report on Remuneration, 14/03/2023: static.inditex.com] & [Ethics Line Procedure, 05/2023: inditex.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware: The Code of Conduct for Manufacturers and Suppliers states: 'Manufacturers and suppliers shall communicate the Code to all employees and those in any way involved in the Inditex Supply Chain. A copy of the Code, translated into the local language, shall be displayed in accessible locations to all workers'. It contains provisions on the Whistleblowing Channel. The Company has provided comments to CHRB regarding this indicator, including information on how the compliance to the Code is mandatory and verified. However, it is not clear how the Company ensures affected external stakeholders at its own operations are made aware of it. Moreover, it does not clarify whether it takes into account local languages. [Code of Conduct for Suppliers, N/A: inditex.com] • Met: Describes how external individuals/communities access grievance mechanism: The Code of Conduct for Manufactures and Suppliers indicates: 'in order to ensure the enforcement of the Code of Conduct for Manufacturers and Suppliers, the Committee of Ethics can act at its own initiative or following a formal complaint made in good faith by a manufacturer, supplier or other interested third party that might have any direct relationship or commercial or professional interest with Inditex. To this end, any notices given pursuant to the provisions of this Code, either reports of any breach or enquiries regarding the Code's interpretation or application can be addressed directly to the Committee of Ethics via': post, email and fax. [Code of Conduct for Suppliers, N/A: inditex.com] • Met: Expects supplier to convey expectation to their suppliers: See above. Suppliers are expected to enforce compliance to this Code down their supply chain [see B.1.4.b]. [Code of Conduct for Suppliers, N/A: inditex.com] & [2021 Modern Slavery, Human Trafficking and Transparency in Supply Chain Statement, N/A: inditex.com]
C.3	Users are involved in the design and performance of the mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes how users engaged on design and performance • Not Met: Provides user engagement examples (at least two) on design and performance <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes how users engaged on improvement of mechanism • Not Met: Provides user engagement examples (at least two) on improvement
C.4	Procedures related to the mechanism(s) are equitable, publicly available and explained	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes procedure and timescales for managing complaints or concerns: The Ethics Line Procedure notes: 'The Ethics Committee will receive the Concerns and Queries reported through the Ethics Line and contact the Whistleblower acknowledging receipt within 7 days of reception thereof, unless such acknowledgement of receipt would jeopardise the confidentiality of the Concern or Query. [...] Any case opened shall be processed within 3 months from

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>the moment receipt of the Concern was acknowledged. Failing such acknowledgement, such 3-month term will start 7 days after the Concern was received, unless this term is too short for an appropriate investigation. In such case, in may be extended for an additional 3-month period'. However, it is not clear how the complainant will be informed. The Company has also got a Global Policy on the Internal Reporting Channels, however, no further evidence found. [Ethics Line Procedure, 05/2023: inditex.com] & [Global Policy on the Internal Reporting Channels, 03/05/2023: inditex.com]</p> <ul style="list-style-type: none"> • Not Met: Describes technical, financial, advisory support to enable equal access: The Company explains that the Ethics Line Procedure [where information on the Ethics Line can be found] and information on the Ethics Line is available online. However, this subindicator looks for the technical, financial or advisory support available to complainants to enable equal access to and participation in the grievance process [it could be for instance, could be training, access to a fund, etc]. [Our Ethical Commitment_web, N/A: inditex.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism: The Ethics Line Procedure states: 'Once the investigation stage is completed, the Ethics Committee will issue a resolution which findings may include, as the case may be: Declaring that a breach exists. In such case, the Committee may take the following measures: The immediate cure of such breach and the adoption of the measures to repair the damage caused and to prevent any future breach, if appropriate. Disciplinary measures, ranging from a mere admonishment or warning to dismissal; Referring the resolution to the relevant department so that it will take and apply in any case the remediation measures which may be necessary. Such remediation measures shall be reported to the Ethics Committee; Closing the case where the Committee finds that no breach whatsoever has occurred'. However, this subindicator looks for an explanation of the types of outcomes to the complainant through use of the grievance mechanisms. [Ethics Line Procedure, 05/2023: inditex.com] • Not Met: Describes escalation to senior levels / independent adjudicators: The Ethics Line Procedure states: 'The Ethics Line is the preferred channel to report the Concerns that may fall within this Procedure's scope of application. However, persons referred to in Article 4 of Directive (EU) 2019/1937 shall be apprised of the fact that they may also use the external reporting channels designated by the competent authorities in each case pursuant to applicable regulations, including, where appropriate, vis-à-vis EU institutions, bodies or entities, to report any act or omission that may fall within the material scope of the Directive and/or their respective local regulations. Where this is mandatory under the applicable laws in any market where the Inditex Group operates, information about external reporting channels shall be provided'. However, this subindicator looks for a description of how complaints or concerns for workers and all external individuals and communities may be escalated to more senior levels or independent third party adjudicators or mediators to challenge the process or outcome at the complainant's discretion, beyond the Article 4 of Directive (EU) 2019/1937 application. [Ethics Line Procedure, 05/2023: inditex.com]
C.5	Prohibition of retaliation for raising complaints or concerns	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public statement prohibiting retaliation against workers/stakeholders: The 2022 Annual Report notes: 'The Ethics Line Procedure clarifies and reinforces guarantees and protective measures for all parties in the process: (i) maximum confidentiality; (ii) non-retaliation; (iii) presumption of innocence and respect for the right to honour of reported parties; (iv) the right of the parties to be heard, and; (v) appropriate use of personal data processed. [...] Prohibition of retaliation and indemnity of anyone who reports through the Ethics Line in good faith'. The Global Policy on the Internal Reporting Channels indicates: 'Any form of Retaliation against any Whistleblower who submits, in good faith, Concerns that fall within the scope of this Policy is strictly prohibited, as well as against anyone who may assist the Whistleblower in the course of the investigation, third parties associated with the same, as well as against any legal person owned by the Whistleblower or with which they are otherwise connected in a work-related or professional-related context'. [2022 Annual Report, 14/03/2023: static.inditex.com] & [Global Policy on the Internal Reporting Channels, 03/05/2023: inditex.com] • Met: Describes practical measures to prevent retaliation: The 2021 Modern Slavery, Human Trafficking and Transparency in Supply Chain Statement indicates: 'The Ethics Line [...] is the main grievance and queries mechanism of the Group. Any group employee, manufacturer, supplier or third party with a direct relation and a lawful business or professional interest at all levels and in all geographies

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>(the “Parties Concerned”) may use the Ethics Line, even in an anonymous manner’. [2021 Modern Slavery, Human Trafficking and Transparency in Supply Chain Statement, N/A: inditex.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Specifies no legal action, firing or violence: The Ethics Line Procedure explains Retaliation: ‘Any act or omission which entails, directly or indirectly, an adverse treatment of the individual suffering retaliation, to their detriment in respect of others in a work-related or professional-related context, stemming from the fact that a Concern has been submitted. By way of an example, retaliation shall include suspension, lay-off, dismissal or equivalent measures, demotion or withholding of promotion and transfer of duties, change of location of place of work, reduction in wages or changes in working hours’. No prohibition of retaliation found in the document, as it is found in the section ‘Definition’. No further evidence found explicitly indicating that it will not retaliate against workers and stakeholders through the specific ways required by this subindicator. [Ethics Line Procedure, 05/2023: inditex.com] • Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders: According to the section ‘Definitions’ of the Ethics Line Procedure Whistleblower means: ‘Any employee, director and/or shareholder in any Group company, as well as any person who works under the guidance of manufacturers, suppliers, contractors and subcontractors of the Inditex Group, who in a work-related (regardless of whether the relationship has yet to begin or has ended), business-related or professional-related context, has acquired information about Breaches or Other Breaches, or has made a Query, as well as any other person who pursuant to the prevailing laws on the markets where the Group operates qualify as such’. However, this subindicator looks for evidence that the Company expects its business partners to prohibit retaliation against workers and other stakeholders (including those that represent them) for raising human rights related concerns. No further evidence found. [Ethics Line Procedure, 05/2023: inditex.com] & [Code of Conduct for Suppliers, N/A: inditex.com]
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Complainants not asked to waive legal rights: The Ethics Line Procedure states: ‘The Ethics Line shall not detract access by Whistleblowers to any other court or out-of-court grievance mechanism, or any external reporting channels made available by competent authorities’. Also, ‘persons referred to in Article 4 of Directive (EU) 2019/1937 shall be apprised of the fact that they may also use the external reporting channels designated by the competent authorities in each case pursuant to applicable regulations, including, where appropriate, vis-à-vis EU institutions, bodies or entities, to report any act or omission that may fall within the material scope of the Directive and/or their respective local regulations. Where this is mandatory under the applicable laws in any market where the Inditex Group operates, information about external reporting channels shall be provided’. [Ethics Line Procedure, 05/2023: inditex.com] • Not Met: Does not require confidentiality provisions: The Global Sexual Harassment and Sex or Gender Identity-Based Policy indicates: ‘Under no circumstances shall victims be blamed, concerns or complaints be concealed, or victims of sexual harassment or sex and/or sex or gender identity-based harassment be talked out of reporting such conduct’. The Company has provided additional comments to CHRB regarding this indicator, including information on the Ethics Line Procedure. However, this subindicator looks for evidence where the Company states that it does not require confidentiality provisions (e.g., non-disclosure agreements) with respect to human rights grievances. No further evidence found. [Global Sexual Harassment and Sex or Gender Identity-Based Harassment Policy, 15/03/2022: inditex.com] & [Ethics Line Procedure, 05/2023: inditex.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Cooperates with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable): The Company has provided comments to CHRB regarding this indicator, including information on the different types of reports submitted through the Ethics Line and the number of disciplinary measures or termination implemented as consequence of confirmed cases of corruption, discrimination or harassment. However, this subindicator looks for an example of issues resolved (if applicable), in which the Company cooperates with state-based non-judicial grievance mechanism on complaints brought against it. No further evidence found. [2022 Annual Report, 14/03/2023: static.inditex.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.7	Remedying adverse impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes approach taken to remedy adverse HRs impacts: The 2022 Annual Report indicates: 'Wherever our assessments reveal the presence of migrant or refugee workers in any of the production facilities we work with, we examine the circumstances case by case to effectively evaluate their working and living conditions. With their needs in mind, we implement remediation plans in tandem with expert organisations, so as to support them and their families. These plans are especially important in Türkiye, where we have been working with the local organisation MUDEM to implement them since 2016'. The Workers at the Centre report adds that 'We worked in Türkiye with MUDEM on the implementation of remediation plans for refugees and migrants. [...] In collaboration with MUDEM, remediation plans in Türkiye start with a detailed assessment of the working and living conditions of refugee and migrant workers through individual meetings, in order to understand their needs. In addition to addressing the workers' needs, specific actions are also considered to improve their living conditions if any vulnerability or violation of basic human rights is detected. The main objective is to ensure that these workers continue their working life with work permits and social security, as well as to facilitate their integration, for instance by removing language barriers. Guidance is also provided if any other needs are identified, such as psychological support services'. 'Corrective Action Plans (CAPs): when our ongoing assessments detect a non-compliance, our teams support the supplier to correct or prevent it'. [2022 Workers at the Centre Report, 2023: inditex.com] & [2022 Workers at the Centre Report, 2023: inditex.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes changes to systems, processes and practices to prevent future impacts: The Company has provided comments to CHRB regarding this indicator, including information on its work in cooperation with MUDEM and other organizations: 'In 2022, we expanded our collaboration with MUDEM through the Worker Support Centre project, a complaint tool created so that those working in the textile industry can submit any grievances they may have with their workplace. The main objective is to assess the complaints of refugee workers and contact them to provide free advice. Experts also provide detailed information on recruitment and employment practices in order to understand whether there are other human and labour rights violations taking place'. Also, 'We have been running the Refugee Rights Training Programme in Türkiye since 2018 in collaboration with United Work, which is an initiative aimed at creating peaceful workplaces and facilitating cohesion in factories in our supply chain where people from different cultures work. In 2022, we implemented the programme in 14 factories at different production levels. In total, 145 refugee workers participated in four-hour training sessions, 39 supervisors and 26 management representatives also received one and-a-half hour briefings on refugee workers' rights, labour regulation, stereotypes and misconceptions, as well as on cultural similarities and effective communication in the workplace'. However, although the Company discloses different actions taken, the subindicator looks for a description of changes to systems, processes and practices to prevent similar adverse impacts [adverse human rights impacts which it has caused or to which it has contributed] in the future. [2022 Workers at the Centre Report, 2023: inditex.com] • Not Met: Describes approach to monitoring/implementing agreed remedy: The 2022 Workers at the Centre Report notes: 'The year 2022 was also significant because it saw the signing of the Protocol for the implementation of the Global Framework Agreement between IndustriALL Global Union and Inditex, which promotes social dialogue through the establishment of new mechanisms that strengthen the role of local trade unions and move towards a better understanding of the needs of workers in our supply chain. Likewise, a further step has been taken with regard to our knowledge and monitoring of the working conditions in our supply chain with the inclusion of the 'Procedure for the exercise of trade union access to supplier factories in the Inditex production chain' in the aforementioned Protocol. This is the procedure for accessing the centres, and it is a pioneering element in terms of the transparency of our Global Framework Agreement in the sector, which is further strengthened after this important development'. However, although the Company indicates it has a mechanism that enable trade unions to monitor working conditions, it is not clear how it the process in place to monitor the implementation of agreed remedy for victims [for adverse human rights impacts which it has caused or to which it has contributed]. [2022 Workers at the Centre Report, 2023: inditex.com] • Not Met: Describes approach to learning from incidents if no adverse impacts identified

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Discloses number of grievances filed, addressed or resolved and outcomes achieved: The 2022 Annual Report indicates that in 2022, there were 392 concerns received, and 312 concerns processed. It includes: 209 reports on HR, Diversity and Workplace Respect, of which 90 dealt with potential situations of harassment, discrimination and/Annual Report violation of fundamental rights; 6 EHS. Moreover, there was one confirmed case of discrimination and one confirmed case of harassment. However, no information found specifically on the outcomes achieved for its own workers, for external individuals or communities that may be adversely impacted by the Company. [2022 Annual Report, 14/03/2023: static.inditex.com] • Not Met: Example of how lessons from mechanism improved HRs management system: The 2022 Annual Report notes: ‘This [Ethics Line] Procedure, which was amended by the Board of Directors in December 2019, is aligned with the principles of Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law and, in particular, with the regulatory requirements regarding the protection of personal data and the rights of users of whistleblowing mechanisms, as well as with international best practices in the field of human rights. In this regard, in 2022 subsequent transpositions of the Directive into national Law have been monitored and analysed to ensure that the Ethics Line is compliant with the applicable requirements’. The Company has provided comments to CHRB regarding this indicator, including information on its newly approved Global Policy on the Internal Reporting Channels of the Inditex Group. However, this subindicator looks for an example specifically of how lessons from the grievance mechanism have contributed to improving the company's human rights management system. [2022 Annual Report, 14/03/2023: static.inditex.com] & [Global Policy on the Internal Reporting Channels, 03/05/2023: inditex.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes process to evaluate mechanism and changes made as a result: The 2022 Annual Report notes: ‘The Ethics Committee is the internal body in charge of overseeing the proceedings of the Ethics Line and compliance with its procedure, pursuing any investigations that may be necessary. This internal body operates in accordance with the provisions of the Regulations of the Ethics Committee, which was updated in 2022 for the purposes, inter alia, of strengthening supervisory and management functions with respect to the Ethics Line, including certain changes to its operating procedures and conferring on the Committee, where necessary pursuant to applicable regulations, the power to set up local counterpart committees. The operation of the Ethics Line is set out in the Ethics Line Procedure. This Procedure, which was amended by the Board of Directors in December 2019, is aligned with the principles of Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law and, in particular, with the regulatory requirements regarding the protection of personal data and the rights of users of whistleblowing mechanisms, as well as with international best practices in the field of human rights. In this regard, in 2022 subsequent transpositions of the Directive into national Law have been monitored and analysed to ensure that the Ethics Line is compliant with the applicable requirements’. However, no description of the process to review the effectiveness of the grievance mechanism found, including examples of changes made as a result. [2022 Annual Report, 14/03/2023: static.inditex.com] • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

D. Performance: Company Human Rights Practices (25% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.1.b	Living wage (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Requirements on living wage in supplier codes and contracts: The Code of Conduct for Manufactures and Suppliers indicates: ‘Manufacturers and suppliers shall ensure that wages paid meet at least the minimum legal or collective bargain agreement, should this latter be higher. In any event, wages should always be enough to meet at least the basic needs of workers and their families and any other which might be considered as reasonable additional needs’. [Code of Conduct for Suppliers, N/A: inditex.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Describes work with suppliers on living wage: The 2022 Annual Report indicates: ‘we highlight the importance of our collaboration with other brands through various initiatives, such as ACT (Action, Collaboration, Transformation), which works to achieve living wages in the supply chain through responsible purchasing practices and collective bargaining’. Moreover, ‘Raising awareness and training of our suppliers enables us to address supply chain challenges as a shared responsibility. [...] A prime example is the continuous and specialised training on issues such as gender equality, freedom of association, living wages or health and safety. In 2022, we provided training programmes to 1,042 suppliers’. [2022 Annual Report, 14/03/2023: static.inditex.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of payment below living wage in supply chain: The 2022 Annual Report provides data on the percentage of compliance with the Code of Conduct in the active factories of suppliers with purchases in 2022, including Wage compliance. It also indicates the number of workers benefited by the Company's living wages strategy: 98.903. However, although the Company indicates the number of wage related non-conformances, and the number of workers who benefited from its strategy, it is not clear the number of people affected by (scope of) payment below living wages in its supply chain. [2022 Annual Report, 14/03/2023: static.inditex.com] • Not Met: Analysis of trends demonstrating progress: The Company discloses figures on the compliance to the Code, including in relation to wage compliance. However, figures were only for the year 2022. No analysis of trends demonstrating progress found. The Company has provided comments to CHRB regarding this indicator explaining that it annually publishes these KPIs and that its reports are available on its corporate website. However, the Company is expected to provide the year-on-year data showing the trend. [2022 Annual Report, 14/03/2023: static.inditex.com] & [Sustainability_web, N/A: inditex.com]
D.2.2	Aligning purchasing decisions with human rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes practices to avoid price or short notice requirements that undermine HRs: The 2021 Modern Slavery, Human Trafficking and Transparency in Supply Chain Statement indicates: ‘employees undertake specific training depending on their roles and responsibilities. [...] Such training covers responsible purchasing practices and their influence on employee rights. [...] From the perspective of the impact of responsible purchasing practices on the conditions of workers in the supply chain, such practices encompass purchase-related aspects, such as planning, price-fixing, terms of delivery to suppliers, or the business relationship with them, all of which has an impact on workers. Thus, buyers’ teams play a significant role in the pursuit of a more sustainable supply chain. In 2021, 228 buyers and 28 heads of the commercial area of the different brands were trained in responsible purchasing practices’. The 2022 Annual Report indicates: ‘Responsible purchasing practices can help create an environment that is conducive to improving working conditions, wages and benefits for workers in the supply chain. Mindful of this, as ACT members since 2018 we have signed up to five commitments in relation to purchasing practices. To implement these commitments and help our buyer teams make responsible purchasing decisions, we train them to adopt best practices and we develop and provide them with management systems to measure the sustainability performance of each supplier and factory’. [2021 Modern Slavery, Human Trafficking and Transparency in Supply Chain Statement, N/A: inditex.com] & [2022 Annual Report, 14/03/2023: static.inditex.com] • Met: Describes practices to pay suppliers in line with agreed timeframes: The 2022 Workers at the Centre Report notes: ‘In 2018, we strengthened our collaboration with ACT [Action, Collaboration, Transformation] by adhering to the five commitments on purchasing practices: [...] Uphold the previously agreed payment conditions. [...] To implement these commitments in our business model, we have trained our commercial teams to adopt best practices from a sustainability and human rights perspective. In addition, we have developed and launched management systems that measure the sustainability performance of each supplier and factory so that commercial teams can incorporate all sustainability criteria into their purchasing decisions’. [2022 Workers at the Centre Report, 2023: inditex.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Reviews own operations to mitigate negative impact of purchasing practices: The 2021 Modern Slavery Statement indicates: ‘From the perspective of the impact of responsible purchasing practices on the conditions of workers in the supply chain, such practices encompass purchase-related aspects, such as planning, price-fixing, terms of delivery to suppliers, or the business relationship with them, all of which has an impact on workers’. The 2022 Workers at the Centre Report notes: ‘The Purchasing Practices Self-Assessment (PPSA) for brands and the Purchasing Practices Assessment (PPA) for suppliers should also be noted, which were conducted in 2021 under a joint due diligence framework called the Accountability & Monitoring Framework to ensure that ACT member brands’ purchasing practices facilitate the payment of a living wage. The results of the surveys helped us to advance our strategy to deliver on the five purchasing practices commitments. Moreover, they enabled us to analyse and design individual, departmental and corporate action plans to roll out a training programme with common guidelines on ACT’s commitments and their relationship with purchasing practices’. [2021 Modern Slavery, Human Trafficking and Transparency in Supply Chain Statement, N/A: inditex.com] & [2022 Workers at the Centre Report, 2023: inditex.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Meets all requirements under score 1 • Not Met: Example of assessing and changing of purchasing practices: The 2022 Workers at the Centre Report notes: ‘The Purchasing Practices Self-Assessment (PPSA) for brands and the Purchasing Practices Assessment (PPA) for suppliers should also be noted, which were conducted in 2021 under a joint due diligence framework called the Accountability & Monitoring Framework to ensure that ACT member brands’ purchasing practices facilitate the payment of a living wage. The results of the surveys helped us to advance our strategy to deliver on the five purchasing practices commitments. Moreover, they enabled us to analyse and design individual, departmental and corporate action plans to roll out a training programme with common guidelines on ACT’s commitments and their relationship with purchasing practices’. However, no evidence found of what changes it made to practices to avoid undermining its human rights commitments. [2022 Workers at the Centre Report, 2023: inditex.com]
D.2.3	Mapping and disclosing the supply chain	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Identifies direct and indirect suppliers including manufacturing sites: The 2021 Modern Slavery, Human Trafficking and Transparency in Supply Chain Statement states: ‘On account of its global supply chain, Inditex strives to identify each and every player involved in the production of goods, to ensure that they all meet the Group’s strong sustainability commitments’. The 2022 Annual Report indicates: ‘we have traceability management and assessment programmes. [...] In 2022, we went a step further in the responsible management of our entire supply chain by introducing new traceability provisions, increasing the level of detail of the minimum requirements for our suppliers [...] Thus, these provisions state that our suppliers must: Know their supply chain and work exclusively with manufacturers and intermediaries previously assessed and authorised by Inditex and which comply with all our Sustainability standards. Notify of all the facilities and intermediaries involved in each of the productive processes, from fibre or yarn to the finished garment for each order, including both their own facilities and those contracted by themselves or by third parties. In 2022, we furthered our knowledge of their origin by working together with our suppliers. Provide proof of the use of preferred raw materials⁶ by means of documentation certifying their origin, including facility certification as required’. It has established designation control checks and raw material certification verifications as well as traceability audits. [2021 Modern Slavery, Human Trafficking and Transparency in Supply Chain Statement, N/A: inditex.com] & [2022 Annual Report, 14/03/2023: static.inditex.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of supply chain and how significance was defined

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Discloses direct or indirect suppliers involved in higher-risk activities: The 2022 Annual Report notes: 'In 2022, Inditex's supply chain comprised 1,729 suppliers - equivalent to tier 1 and defined as direct suppliers with which Inditex maintains a commercial relationship - which, in turn, used 8,271 factories for the Group's productions - equivalent to suppliers beyond tier 1. Fashion item suppliers with production of over 20,000 units in the spring/summer and autumn/winter 2022 campaigns are included. Suppliers with lower productions account for 0.22% of total production'. It adds: 'Based on the social audits, suppliers and manufacturers are rated in accordance with their degree of compliance with the Code of Conduct'. It continues: 'Subject to CAP' means 'Breaches of the CCMS triggering the immediate implementation of a corrective action plan'. The Company indicates that in 2022, 2% of its suppliers are rated as such. It also discloses specific 'non-compliances' in the different continents. In the case of Wage compliance, for instance, it indicates that there is a compliance of less than 50% in Asia. The same applies to working hours also in Asia and in Europe outside the EU. However, it does not seem to disclose which direct or indirect suppliers it considers to be involved in higher-risk activities, geographies, and products. [2022 Annual Report, 14/03/2023: static.inditex.com]
D.2.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Requirements on child labour in supplier codes and contracts: The Code of Conduct for Manufacturers and Suppliers indicates: 'Manufacturers and suppliers shall not employ minors. Inditex defines minors as those persons who have not yet reached their 16th birthday. In cases where local legislation stipulates a higher minimum age, the higher limit shall apply. Persons with the ages between of 16 and 18 years will be considered young workers. Young workers shall not work during night hours or in hazardous conditions'. The 2022 Annual Report discloses percentage of compliance regarding 'no work by youths or child labour'. It adds that figures provided includes 'the lack of suitable systems for verifying the age of workers'. The 2022 Workers at the Centre Report notes: 'the child labour remediation plan is a mandatory process implemented globally that is activated if a worker under the age established in our Code is identified. In the event that a minor is detected, auditors make this known and the internal team intervenes as soon as possible'. [Code of Conduct for Suppliers, N/A: inditex.com] & [2022 Annual Report, 14/03/2023: static.inditex.com] • Met: Describes work with suppliers on eliminating child labour: The 2022 Workers at the Centre Report notes that in Mali: 'progress has been made in close collaboration with the ACCEL AFRICA Project, which also supports lower-level workers in supply chains, with a focus on women. An intervention to improve and diversify the livelihoods of these workers has been designed to address the causes of child labour in the Sikasso region by: Raising awareness of child labour: As part of this intervention, children aged 8-12 years are enrolled in accelerated alternative education that enables them to join the formal education system after nine months. In this second year, 16 centres were opened and 452 children were enrolled, of which 218 were girls. Integrating mitigation measures into economic empowerment activities to reduce the risk of child labour. Strengthening women's operational capabilities to carry out income-generating activities: the project was presented to communities and women's organisations to promote the selected income-generating activities and offer advice and technical support. In total, 796 people were supported, 742 of them women. Increasing access to financial and non-financial services: In partnership with the microfinance institution Réseau de Micro-Institutions de Croissance et de Revenues (RMCR), 302 women have opened a savings account and 277 have received a loan to start implementing their income-generating activities on time'. [2022 Workers at the Centre Report, 2023: inditex.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of child labour in supply chain: The 2022 Annual Report provides data on the percentage of compliance with the Code of Conduct in the active factories of suppliers with purchases in 2022, including 'No work by youths or child labour'. However, although the Company indicates the number of conformances, it is not clear the number affected by (scope of) child labour in its supply chain. [2022 Annual Report, 14/03/2023: static.inditex.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Analysis of trends demonstrating progress: The Company has provided comments to CHRB regarding this indicator explaining that it annually publishes its monitoring results and that its reports are available on its corporate website, including data on 'No work by youths or child labour' compliance. It also makes reference to the 2022 Workers at the Centre Report to find qualitative data on the outcomes of the projects it carries out. However, the Company is expected to provide the year-on-year data showing trends, rather than isolated figures. [2022 Annual Report, 14/03/2023: static.inditex.com]
D.2.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Requirements on debt/fees in supplier codes and contracts: The Code of Conduct for Manufactures and Suppliers indicates: 'Inditex shall not allow any form of forced or involuntary labour in their manufacturers and suppliers. They may not require their employees to make any kind of "deposits" [...]. Manufacturers and suppliers shall authorize Inditex and/or any third parties the former might appoint, to monitor the appropriate enforcement of the Code'. However, no evidence found of a contractual arrangement or supplier code of conduct requirement prohibiting also any third-party recruitment intermediaries from imposing financial burdens on job seekers and workers by collecting recruitment fees or related costs. [Code of Conduct for Suppliers, N/A: inditex.com] • Not Met: Describes work with suppliers on debt/fees for job seekers/workers: Regarding Fair employment and recruitment practices for migrants and refugees, the 2021 Modern Slavery, Human Trafficking and Transparency in Supply Chain Statement indicates: 'This action line focuses on having the suppliers in our supply chain resort to fair and just employment and recruitment practices in respect of all workers, whether or not they are migrant and/or refugees. To achieve this, alliances are entered with local organizations aimed at raising awareness and build skills among managers, works and the communities where they all live. An example of our work is the Sowbhagyam 2 programme, implemented in India in partnership with the local NGO SAVE, to assess the potential risks to which women workers at the spinning mills in the Tamil Nadu region are exposed, and to introduce the measures needed to reduce them'. The 2022 Workers at the Centre Report notes one of its strategies to protect migrants and refugees is: 'Fair employment and recruitment practices for migrants and refugees: Establishing effective management systems to ensure that all workers, including migrants and refugees, are fairly recruited and benefit from decent working conditions is a key part of our work in this Priority Impact Area. In Türkiye, we work with various stakeholders, including the International Labour Organization (ILO), to improve management systems and business practices so as to prevent any human rights violations in the recruitment and employment of workers, including refugees'. It has a project to 'prevent unsafe migration of children and adults'. The Company has provided comments to CHRB regarding this indicator, including information on its general Corrective Action Plan for when non-compliances are found. However, it is not clear how it works with suppliers specifically to eliminate recruitment fees and related costs, including by ensuring full reimbursement to workers where relevant. [2021 Modern Slavery, Human Trafficking and Transparency in Supply Chain Statement, N/A: inditex.com] & [2022 Workers at the Centre Report, 2023: inditex.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment scope of payment of recruitment fees in supply chain: The 2022 Annual Report provides data on the percentage of compliance with the Code of Conduct in the active factories of suppliers with purchases in 2022, including No forced labor. However, no assessment of the number affected by (scope of) the payment of recruitment fees or related costs in its supply chain found. [2022 Annual Report, 14/03/2023: static.inditex.com] • Not Met: Analysis of trends demonstrating progress: The Company has provided comments to CHRB regarding this indicator explaining that it annually publishes its monitoring results and that its reports are available on its corporate website, including data on No forced labor compliance. It also makes reference to the 2022 Workers at the Centre Report to find qualitative data on the outcomes of the projects it carries out. However, the Company is expected to provide the year-on-year data showing trends, rather than isolated figures. [2022 Annual Report, 14/03/2023: static.inditex.com] & [2022 Workers at the Centre Report, 2023: inditex.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Requirements on paying in full and on time in supplier codes and contracts: The Code of Conduct for Manufactures and Suppliers indicates: ‘Manufacturers and suppliers shall not make any withholdings and/or deductions from wages for disciplinary purposes, nor for any reasons other than those provided in the applicable regulations, without the express authorization of workers. [...] Manufacturers and suppliers shall also ensure that wages and any other allowances or benefits are paid on time and are rendered in full compliance with all applicable laws and specifically, that payments are made in the manner that best suits the workers’. [Code of Conduct for Suppliers, N/A: inditex.com] • Met: Describes work with suppliers on paying workers regularly, in full and on time: Regarding the improvement of the management systems and wage digitalisation, the 2021 Modern Slavery, Human Trafficking and Transparency in Supply Chain Statement indicates: ‘We conduct a process of monitoring and strengthening the wage management systems in the Inditex supply chain. This process includes promoting workers' access to digital payments and services and training them in the use of available technologies and services’. It provides examples of projects implemented in 2022: ‘Wage digitalisation capacity building (Vietnam); HERfinance – digital payments (Cambodia, China, Egypt, India and Vietnam); Wage analysis (Bangladesh, China, India and Pakistan)’. [2021 Modern Slavery, Human Trafficking and Transparency in Supply Chain Statement, N/A: inditex.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment scope of failure to pay workers in full and on time in supply chain: The 2022 Annual Report provides data on the percentage of compliance with the Code of Conduct in the active factories of suppliers with purchases in 2022, including No forced labor and Wage compliance. The Company has provided comments to CHRB regarding this indicator explaining indicating that 79% of workers get paid digitally. However, no assessment of the number affected by (scope of) failure to pay directly, in full and on time in its supply chain found. [2022 Annual Report, 14/03/2023: static.inditex.com] & [2022 Workers at the Centre Report, 2023: inditex.com] • Not Met: Analysis of trends demonstrating progress: The Company has provided comments to CHRB regarding this indicator explaining that it annually publishes its monitoring results and that its reports are available on its corporate website, including data on ‘No forced labor’ and ‘Wage compliance’ compliance. It also makes reference to the 2022 Workers at the Centre Report to find qualitative data on the outcomes of the projects it carries out. However, the Company is expected to provide the year-on-year data showing trends, rather than isolated figures. [2022 Annual Report, 14/03/2023: static.inditex.com] & [2022 Workers at the Centre Report, 2023: inditex.com]
D.2.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Requirements on free movement in supplier codes and contracts: The Code of Conduct for Manufactures and Suppliers indicates: ‘Inditex shall not allow any form of forced or involuntary labour in their manufacturers and suppliers. They may not require their employees to make any kind of “deposits”, nor are they entitled to retain employees’ identity documents. Manufacturers shall acknowledge the right of their employees to leave their employer after reasonable notice’. [Code of Conduct for Suppliers, N/A: inditex.com] • Not Met: Describes working with suppliers on free movement of workers: The Code of Conduct for Manufactures and Suppliers indicates: ‘Manufacturers and suppliers shall authorize Inditex and/or any third parties the former might appoint, to monitor the appropriate enforcement of the Code’. The Company has provided comments to CHRB regarding this indicator, including information on its general Corrective Action Plan for when non-compliances are found. However, it is not clear how it works with suppliers specifically to eliminate retention of worker’s documents or other actions to physically restrict movement’. [Code of Conduct for Suppliers, N/A: inditex.com] & [Supply chain - management to transform the sector, N/A: inditex.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of restriction of movement in supply chain: The 2022 Annual Report provides data on the percentage of compliance with the Code of Conduct in the active factories of suppliers with purchases in 2022, including ‘No forced labour’. However, no assessment of the number affected by (scope of) retaining documents or restricting movement in its supply chain found. [2022 Annual Report, 14/03/2023: static.inditex.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Analysis of trends demonstrating progress: The Company has provided comments to CHRB regarding this indicator explaining that it annually publishes its monitoring results and that its reports are available on its corporate website, including data on 'no forced labour' compliance. It also makes reference to the 2022 Workers at the Centre Report to find qualitative data on the outcomes of the projects it carries out. However, the Company is expected to provide the year-on-year data showing trends, rather than isolated figures. [2022 Annual Report, 14/03/2023: static.inditex.com]
D.2.6.b	Freedom of association and collective bargaining (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Requirements on FoA/CB in suppliers codes and contracts: The Code of Conduct for Manufactures and Suppliers indicates: 'Manufacturers and suppliers shall ensure that their employees, without distinction, have the right of association, union membership and collective bargaining. No retaliation may arise from the exercise of such right and no remuneration or payment whatsoever may be offered to the employees in order to hinder the exercise of such a right. Likewise, they shall adopt an open and collaborative attitude towards the activities of Trade Unions. Workers' representatives shall be protected from any type of discrimination and shall be free to carry out their representative functions in their workplace. Where the rights to Freedom of Association and Collective Bargaining are restricted under law, the appropriate channels to ensure a reasonable and independent exercise of such rights must be designed'. [Code of Conduct for Suppliers, N/A: inditex.com] • Met: Describes work with suppliers on FoA/CB: The 2022 Annual Report indicates: 'The effective promotion of social dialogue in our supply chain is based on the premise of ensuring effective representation mechanisms at both sector and work centre level. In this regard, we are actively engaged in initiatives such as ACT (Action, Collaboration, Transformation), the International Labour Organization (ILO) through its Better Work programme and the Ethical Trading Initiative (ETI)'. It discloses projects implemented in 2022: 'Better Work programme (Bangladesh, Cambodia, Egypt, Indonesia, Pakistan and Vietnam); Social Dialogue and Gender Sensitive Workplace Programme (Bangladesh)'. [2022 Annual Report, 14/03/2023: static.inditex.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of restriction of FoA/CB in supply chain: The 2022 Annual Report provides data on the percentage of compliance with the Code of Conduct in the active factories of suppliers with purchases in 2022, including 'Respect for freedom of association and collective bargaining'. However, no assessment of the number affected by (scope of) restrictions to freedom of association or collective bargaining in its supply chain found. [2022 Annual Report, 14/03/2023: static.inditex.com] • Not Met: Analysis of trends demonstrating progress: The Company has provided comments to CHRB regarding this indicator explaining that it annually publishes its monitoring results and that its reports are available on its corporate website, including data on 'Respect for freedom of association and collective bargaining' compliance. It also makes reference to the 2022 Workers at the Centre Report to find qualitative data on the outcomes of the projects it carries out. However, the Company is expected to provide the year-on-year data showing trends, rather than isolated figures. [2022 Annual Report, 14/03/2023: static.inditex.com] & [2022 Workers at the Centre Report, 2023: inditex.com]
D.2.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Requirements on H&S in supplier codes and contracts: The Code of Conduct for Manufactures and Suppliers indicates: 'Manufacturers and suppliers are responsible for all products supplied to Inditex to comply with Inditex health and safety product standards so that the commercialized products do not entail any risk to customers. [...] Manufacturers and suppliers shall provide a safe and healthy workplace to their employees, ensuring minimum conditions of light, ventilation, hygiene, fire prevention, safety measures and access to a drinking water supply. Workers shall have access to clean toilets facilities and drinking water. Where necessary, facilities for food storage shall be provided. Accommodation, where provided, shall be clean and safe. Manufacturers and suppliers shall take the required steps to prevent accidents and injuries to health of their workers, by minimizing as much as possible the risks inherent to work [...]'. [Code of Conduct for Suppliers, N/A: inditex.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Discloses injury rate or lost days in supply chain in last reporting period: The Company has provided comments to CHRB regarding this indicator, including information on the number of direct suppliers it has and the number of factories it works with. However, no material evidence found. [2022 Annual Report, 14/03/2023: static.inditex.com] • Not Met: Discloses fatalities for workers in supply chain in last reporting period • Not Met: Discloses occupational disease rate in supply chain in last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes work with suppliers of H&S: Regarding the implementation of occupational health and safety management systems, it indicates: 'In this strategic area, we carry out projects aimed at reinforcing the commitment of our suppliers and manufacturers to occupational health and safety and at equipping their organisational structure to establish management systems targeting continuous improvement'. It discloses some projects implemented in 2022: 'WISH: Workplace Improvement for Safety and Health (China); HOPE: Health – Opportunity to Protect and Engage (India)'. [2022 Annual Report, 14/03/2023: static.inditex.com] • Not Met: Assessment of scope of H&S issues in supply chain: The 2022 Annual Report provides data on the percentage of compliance with the Code of Conduct in the active factories of suppliers with purchases in 2022, including 'Hygiene at work'. However, no assessment of the number affected by (scope of) health and safety issues in its supply chain found. [2022 Annual Report, 14/03/2023: static.inditex.com] • Met: Analysis of trends demonstrating progress: The Company discloses figures on the compliance to the Code, including in relation to health and safety compliance. However, figures were only for the year 2022. The 2022 Workers at the Centre Report notes: 'Compliance with our Code of Conduct and applicable legislation in our supply chain—the first of the work lines—has shown a positive evolution during this period, which has been verified by our social audits. In particular, we noted an increase of more than 13% overall in compliance with the provisions of the Code on occupational health and safety at work since the strategy began'. [2022 Annual Report, 14/03/2023: static.inditex.com] & [2022 Workers at the Centre Report, 2023: inditex.com]
D.2.8.b	Women's rights (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Requirements on women's rights in contracts/codes with suppliers: The Code of Conduct for Manufactures and Suppliers indicates: 'Manufacturers and suppliers shall not apply any type of discriminatory practice with regards the recruitment, compensation, access to training, promotion, termination of the employment agreement or retirement, based on [...] gender [...]'. However, although it indicates it should not discriminate, it is not clear it includes equal pay for equal work. It adds: 'Manufacturers and suppliers shall provide a safe and healthy workplace to their employees, ensuring minimum conditions of light, ventilation, hygiene, fire prevention, safety measures and access to a drinking water supply. Workers shall have access to clean toilets facilities and drinking water. Where necessary, facilities for food storage shall be provided'. However, no specific reference to women health and safety found. The Code notes: 'Manufacturers and suppliers shall authorize Inditex and/or any third parties the former might appoint, to monitor the appropriate enforcement of the Code'. The Human Rights Policy states: 'Inditex rejects any form of discrimination, respecting its employees' diversity and offering equal opportunities for employment and professional promotion'. The 2021 Modern Slavery, Human Trafficking and Transparency in Supply Chain Statement indicates: 'Before commencing work for Inditex, all suppliers accept and undertake to meet [...] the Inditex Minimum Requirements'. The 2022 Annual Report adds: 'The IMRs are made up of a series of documents (such as the Code of Conduct for Manufacturers and Suppliers, the Policy on Human Rights or the Traceability Requirements for Suppliers and Manufacturers)'. The Company has provided comments to CHRB regarding this indicator, including information on its general Corrective Action Plan for when non-compliances are found and on its Workers at the Centre programmes. However, it is not clear the Company requires suppliers to provide equal pay for equal work, to introduce measures to ensure equal opportunities throughout all levels of employment and to eliminate health and safety concerns that are particularly prevalent among women workers in its contractual arrangements with suppliers or supplier code of conduct. [Code of Conduct for Suppliers, N/A: inditex.com] & [Human rights policy 2016, 12/2016: inditex.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Describes work with suppliers on women's rights: The 2022 Annual Report indicates: 'At Inditex we advocate improved access to health care for women, as well as family planning and maternal health. By maintaining an active presence across our supply chain, we have successfully brought these measures to a large number of women who would otherwise have had difficulties accessing products and services'. It discloses projects implemented in 2022: 'Medicus Mundi Health (Morocco); Sakhi Health (India); Sakhi Menstrual Rights (India and Sri Lanka); HERhealth (Vietnam)'. Moreover: 'Preventing and managing harassment, abuse and violence when it does occur, and implementing zero tolerance policies towards these conducts, is a part of the human rights strategy we advocate at Inditex. In this regard, in addition to being alert to any such practices in our regular audits and visits to factories in the supply chain, we also use various activities, projects and training to foster the development and implementation of zero tolerance policies on workplace and sexual harassment, as well as prevention practices'. The projects implemented in 2022 include: 'Medicus Mundi Protection (Morocco); HERrespect (Bangladesh); LGBTI+ Awareness (Portugal)'. [2022 Annual Report, 14/03/2023: static.inditex.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of unsafe working conditions/discrimination against women in supply chain: The 2022 Annual Report provides data on the percentage of compliance with the Code of Conduct in the active factories of suppliers with purchases in 2022, including 'No discrimination' and 'No harsh or inhumane treatment'. However, no assessment of the number affected by (scope of) discrimination or unsafe working conditions for women in its supply chain found. [2022 Annual Report, 14/03/2023: static.inditex.com] • Not Met: Analysis of trends demonstrating progress: The Company has provided comments to CHRB regarding this indicator explaining that it annually publishes its monitoring results and that its reports are available on its corporate website, including data on 'No discrimination' and 'No harsh or inhumane treatment' compliance. It also makes reference to the 2022 Workers at the Centre Report to find qualitative data on the outcomes of the projects it carries out. However, the Company is expected to provide the year-on-year data showing trends, rather than isolated figures. [2022 Annual Report, 14/03/2023: static.inditex.com] & [2022 Workers at the Centre Report, 2023: inditex.com]
D.2.9.b	Working hours (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Requirements on working hours in codes/contracts with suppliers: The Code of Conduct for Manufactures and Suppliers indicates: 'Manufacturers and suppliers shall not require their employees to work, as a rule of thumb, in excess of 48 hours a week and workers shall be granted at least one day off for every 7 calendar day period on average. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate, pursuant to the provisions of the prevailing regulations in force'. [Code of Conduct for Suppliers, N/A: inditex.com] • Met: Describes work with suppliers on working hours: The 2022 Workers at the Centre Report notes: 'Through our internal Lean project, we are working closely with our suppliers and their workers to influence wages, improvements in the workplace, health and safety, better cooperation between management and workers and a reduction of working hours'. It provides examples of LEAN project measures: 'Modification of production flow and/or reduction of the amounts of work in progress'; 'SMED techniques (reduced equipment changeover times)'; 'Modification of production flow and/or reduction of the amounts of work in progress' and 'Production smoothing' for which it presents potential related outcomes: 'Reduction of working hours'. [2022 Workers at the Centre Report, 2023: inditex.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of excessive working hours in supply chain: The 2022 Annual Report provides data on the percentage of compliance with the Code of Conduct in the active factories of suppliers with purchases in 2022, including 'Working hours'. However, no assessment of the number affected by (scope of) excessive working hours in its supply chain found. [2022 Annual Report, 14/03/2023: static.inditex.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Analysis of trends demonstrating progress: The Company has provided comments to CHRB regarding this indicator explaining that it annually publishes its monitoring results and that its reports are available on its corporate website, including data on 'working hours' compliance. It also makes reference to the 2022 Workers at the Centre Report to find quantitative and qualitative data on the outcomes of the projects it carries out, including on information on the LEAN Project [see above]. However, the Company is expected to provide the year-on-year data showing trends, rather than isolated figures. [2022 Annual Report, 14/03/2023: static.inditex.com] & [2022 Workers at the Centre Report, 2023: inditex.com]

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
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E(1).0

Serious
allegation No 1

• Area: Forced Labour; Discrimination

• Headline: Inditex among others sued for alleged forced labour of Uighurs

• Story: On March 1st., 2020, the Australian Strategic Policy Institute (ASPI) released a report that named Zara, an Inditex subsidiary, among 83 other companies benefiting from the use of potentially abuse labour transfer programs. According to the report, more than 80,000 Uighur residents and former detainees from the north-western region of Xinjiang, China have been transferred to factories, implicating global supply chains. It is alleged that Muslim minorities are thought to be working in forced labour conditions across the country. The ASPI report said that workers live in segregated dormitories, are required to study Mandarin and undergo ideological training. The workers were transferred out of Xinjiang between 2017 and 2019, claiming that people are being effectively "bought" and "sold" by local governments and commercial brokers. ASPI used open-source public documents, satellite imagery, and media reports and identified 27 factories in nine Chinese provinces that have used labourers. According to the ASPI's research, the companies named in the report are directly or indirectly benefiting from the use of Uyghur workers outside Xinjiang through potentially abusive labour transfer programs as recently as 2019. ASPI researchers stated: "This report exposes a new phase in China's social re-engineering campaign targeting minority citizens, revealing new evidence that some factories across China are using forced Uighur labour under a state-sponsored labour transfer scheme that is tainting the global supply chain".

On April 8, 2021, Media sources reported that an aid group for Uighurs and other parties have filed a complaint in a Paris Court against Uniqlo, a Fast Retailing Group subsidiary, Inditex, SMCP and Skechers, over alleged forced labour of Uighurs in China. The lawsuit brought by Sherpa association, Collectif Éthique sur l'Étiquette (ESE) and Institute Uighour d'Europe (IODE), accuses the four retailing brands of profiting from the forced labour of Uighurs, a Chinese ethnic minority, and concealing crimes against humanity by the continued sourcing and selling of products that use cotton made in China's Xinjiang Uighur autonomous region. Under the lawsuit, Inditex was accused of holding a significant link with Xinjiang fabric and thread producers. Uniqlo and Skechers USA France were accused respectively of sourcing textile from Anhui Province and producing footwear in Guangdong Province, regions where millions of Uighur workers were potentially forcefully transferred. SMCP was also involved as the group has Topsoho as a major shareholder, which is owned in return by the Chinese Group Shandong Ruyi, a company owning a production plant in Xinjiang since 2010.

On April 30, 2021, media sources reported that many US NGOs including Workers Rights Consortium, Clean Clothes Campaign and Anti-Slavery International accuse Inditex of alleged Uyghur forced labour. On March 25, 2021, according to the Coalition to End Forced Labour in the Uyghur Region, the Company had removed an online statement in which it stated that it does not have commercial relations with any factory in the Uyghur Region. The coalition urges the Company to take all the steps laid out in the Call To Action, as actions across the Company's entire supply chain are necessary. The Coalition reported that one in five cotton products sold globally are likely tainted with Uyghur forced labour, and will continue to be sold to consumers around the world until sourcing from the Uyghur Region ends.

On July 02, 2021, French magistrates have opened an inquiry into allegations that four fashion groups, including Inditex, Fast Retailing's Uniqlo, French brand SMCP and Sketchers, profited from being complicit in crimes against humanity, namely forced labour of the Uighur minority in China. The case is based on a complaint lodged in April by the anti-corruption group Sherpa, the French branch of the Clean Clothes Campaign, and the Uighur Institute of Europe, as well as by a Uighur woman who had been held in a camp in Xinjiang, China.

On April 11, 2022, press sources reported that a Canadian coalition of human-rights groups filed a complaint with the Canadian Ombudsperson for Responsible Enterprise (CORE), over allegations that some products sold by 14 companies are made in whole or in part with forced labour in China. According to the Globe and Mail, the companies named in the complaint are Costco, Gap, Hugo Boss, Nike, Ralph Lauren, Zara (an Inditex subsidiary), Diesel, Guess? Corporation, Levi Strauss & Co., Walmart, Lululemon, Amazon, Dynasty Gold and GobiMin. The coalition's complaint, that included 28 advocacy groups such as the Uyghur Rights Advocacy Project, the Canadian Council of Imams and the Toronto Association for Democracy in China, relied on evidence from a 2020 study by the Australian

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Strategic Policy Institute (ASPI), which identified 27 factories in nine Chinese provinces that use Uyghur forced labour. In addition to the ASPI report, the coalition conducted its own research by reviewing shipments bills into Canada, and raised concerns in its complaint about companies' reliance on Chinese cotton, which allegedly meant that "forced labour is present in companies' supply chains even if they monitor their own factories for human rights standards", added press sources.</p> <p>[Australian Strategic Policy Institute, 01/03/2020, "Uyghurs for sale": ad-aspis3.ap-southeast-2.amazonaws.com] [Jiji Press English News Service, 11/04/2021, "Complaint Filed in France against Uniqlo, Others over Uighur": sp.m.jiji.com] [Apparel Insider, 27/04/2021, "US rights group slams Inditex over Xinjiang cotton issue": apparelinsider.com] [The Globe and Mail, 11/04/2022, "Canadian watchdog asked to probe allegations that imports made with forced labour in China": theglobeandmail.com]</p>
E(1).1	The company has responded publicly to the allegation	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Public response: In March 2021, media reported that Inditex took down a statement that it had published on its website regarding the allegations linking its operations to forced labour in Xinjiang. In the statement, Inditex states that it "take[s] a zero-tolerance approach towards forced labor of any kind... [it is] aware of a number of such reports alleging social and labour malpractice in various supply chains among Uyghurs in Xinjiang (China) as well as in other regions, which are highly concerning. Following an internal investigation we can confirm that Inditex does not have commercial relations with any factory in Xinjiang." Additionally, the company states that it has "reinforced engagement with stakeholders at every level of the supply chain to prevent any kind of forced labour." The last snapshot of the statement on the company's website was seen on 23 December 2020. However, as the statement has since been removed, it is not considered publicly available. <p>Furthermore, the Company provided feedback for this indicator. However, it was not material for the assessment as it did not directly speak to the issue of Uyghur forced labour in China. [Business & Human Rights Resource Center, 26/03/2021, "Zara's parent company Inditex reportedly removes statement on zero-tolerance policy for forced labour": business-humanrights.org]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: The Company provided feedback for this indicator. However, it was not material for the assessment.
E(1).2	The company has investigated and taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Engaged with stakeholders: The Company provided feedback for this indicator. However, it was not material for the assessment. • Not Met: Identified cause: The Company provided feedback for this indicator. However, it was not material for the assessment. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: The Company provided feedback for this indicator. However, it was not material for the assessment. • Not Met: Stakeholder input to steps taken: The Company provided feedback for this indicator. However, it was not material for the assessment.
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Provided remedy: The Company provided feedback for this indicator. However, it was not material for the assessment. • Not Met: Evidence for lack of Impact or link: The Company provided feedback for this indicator. However, it was not material for the assessment. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders: The Company provided feedback for this indicator. However, it was not material for the assessment. • Not Met: Remedy delivered: The Company provided feedback for this indicator. However, it was not material for the assessment. • Not Met: Independent remedy process used: The Company provided feedback for this indicator. However, it was not material for the assessment.
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Area: Health & Safety • Headline: Inditex, Amendis, and AM Confection accused of being responsible for February 2021 fatal drowning accident at textile factory in Tangier, Morocco

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Story: The families of deceased and injured workers from a February 2021 fatal drowning accident at a textile factory in Tangier have reportedly called on Moroccan authorities to hold Inditex and AM Confection accountable for the tragedy that has allegedly left them destitute. Reportedly, Inditex works directly with AM Confection at the textile factory in question. The company has also been accused of collusion in covering up any suspicions about their relationship or responsibility for the tragedy. It is claimed that roughly 150 workers at the factory were working in inhumane conditions that do not meet safety standards in Morocco's labour code. Several workers allegedly lost their limbs or drowned after the factory was flooded by rainwater. Amendis is also accused of being directly responsible for the flood as they allegedly maintain the sewage lines adjacent to the factory that caused the flooding. According to reports, the company's construction works impacted the narrow pathways, contributing to the accident. [array24, 24/09/2021, ""The tragedy of the Tangier plant". Families of victims write to new prime minister": array24.com] [raialyoum, 28/09/2021, "The clothes of the Spaniards are covered with the sweat and blood of Moroccans. Tangier: the paradise of the "Indetics" fabric and the hell of simple workers": raialyoum.com] [Business and Human Rights Resource Centre, 11/02/2021, "Morocco: Labour groups call for immediate investigation after at least 28 garment workers, including a 14-year-old girl, are killed in disaster at informal garment factory": business-humanrights.org]
E(2).1	The Company has responded publicly to the allegation	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Public response: The Company provided feedback for this allegations, however, it could not be found based on information in the public domain. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response
E(2).2	The company has investigated and taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Engaged with stakeholders • Not Met: Identified cause <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements • Not Met: Stakeholder input to steps taken
E(2).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Provided remedy • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used
E(3).0	Serious allegation No 3		<ul style="list-style-type: none"> • Area: FoA/CB; Working Hours; Forced Labour; Right to security of persons • Headline: Supplying factories of Inditex's Zara and Primark accused of union-busting and other labour issues in Myanmar • Story: Hundreds of dismissed workers at the Huabo Times factory and the Rui-Ning factory in Myanmar, which supply clothing to Primark and Inditex's Zara, have alleged that they were dismissed after joining and supporting a union. Apparently, over 100 workers were dismissed at the Huabo Times factory and 298 union members were terminated from the Rui-Ning factory under the pretence that they were laid-off due to the coronavirus pandemic. The former workers have criticized Zara for making public statements about equality and sustainability while employees at supplying factories experience long working hours, harassment, and poor sanitary conditions. Workers further claim that they, along with their families, are exposed to risks of contracting COVID-19 due to the factories' failure to enforce safety measures. Reportedly, former employees at the Huabo Times factory have also asked Primark for reinstatement, claiming that employees tried to form a union due to breaches of workers' rights and absence of employment contract defining responsibilities of their employer. <p>The organizations Public Eye and Clean Clothes Campaign have called on fashion companies Tally Weijl, Inditex, Zara, Mango, and Bestseller to address alleged anti-union actions such as mass-dismissals at their supplier Rui-Ning in Myanmar. Reportedly, 324 employees, including 298 union members, were dismissed in early April 2020 under the pretext of protective measures resulting from the COVID-19 crisis. The workers reportedly protested against unsafe working conditions and</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>demanded the full payment of their legally guaranteed salaries for the months of April and May 2020. The trade union president was reportedly attacked by four armed men on April 8, 2020, in an alleged intimidation attempt. Also, when a fire broke out at the warehouse on June 19, 2020, workers were supposedly compelled to continue working instead of being evacuated. The reported incidents allegedly violate basic workers' rights stipulated in international labour right conventions and in the codes of conduct of Tally Weijl, Zara, and Bestseller.</p> <p>A study by NGO Business & Human Rights Resource Centre has revealed alleged systematic and widespread human rights and labour abuse in the supply chain of global fashion brands since the military coup in Myanmar. Allegedly, brands and retailers, including Adidas, Fast Retailing, and Primark, have ignored abusive practices in factories, such as sexual harassment, gender-based violence, wage theft, unjust work rates, forced overtime, and anti-union activities. The study has also mentioned specific cases of sexual harassment, physical, and verbal abuse of female workers by factory managers and supervisors, including punching in the chest and head, being yelled at, and kicking. Inditex's Zara and Bershka, Bestseller Fashion Group, Lidl, and H&M, were among the companies implicated in most abuse allegations. The alleged abuses were committed by factory suppliers or the military in connivance with the suppliers. The NGO claimed that efforts by brands such as Inditex and Mango, which cut ties with their suppliers following abuse allegations, had been inadequate and called for brands to leverage their efforts to ensure workers' safety.</p> <p>[The Guardian, 24/06/2020, "Zara and Primark factory workers say they were fired after forming union": theguardian.com] [PublicEye, 21/07/2020, "Tally Weijl – Respektiere die Arbeitsrechte in Myanmar!": publiceye.ch] [Business & Human Rights Resource Centre, 26/06/2022, "Resistance, harassment and intimidation: Garment worker abuse under Myanmar's military rule": business-humanrights.org]</p>
E(3).1	The Company has responded publicly to the allegation	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response: Inditex has made several public responses regarding the allegations of union busting in its supply chain in Myanmar. [Business & Human Rights Resource Centre, 22/06/2020, "Inditex update on disputes at Rui Ning & Huabo Times factories": business-humanrights.org] [Business & Human Rights Resource Centre, 08/06/2020, "Inditex response": business-humanrights.org] [Business & Human Rights Resource Centre, 05/08/2020, "Inditex statement in response to BHRRC report on freedom of association during COVID-19": business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Detailed response: In June 2020, Inditex responded to questions sent by the Business & Human Rights Resource Centre (BHRRC) regarding union busting in its supply chain in Myanmar. In its response, the company shared that it is playing a "mediation role" between the Rui Nang factory and union members, and has carried out an investigation into the allegations made in relation to the Huabo Times factory. [Business & Human Rights Resource Centre, 22/06/2020: business-humanrights.org]
E(3).2	The company has investigated and taken appropriate action	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Engaged with stakeholders: In its response to the BHRRC in June 2020, Inditex shared that it was playing a "mediation role" between the Rui Nang factory and union members. In the Huabo Times factory, Inditex shared that it has been in "regular contact" with the supplier and has "encourage them to resolve the situation through social dialogue." [Business & Human Rights Resource Centre, 22/06/2020: business-humanrights.org] • Not Met: Identified cause <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements • Met: Stakeholder input to steps taken: Inditex shared that, "[i]n order to reach an agreement the factory has shared its commitment to reinstate the union president." The company has also been trying to "build an agreement" between the Rui Nang factory and the union with the help of the NGO, IndustriALL. Inditex also shared that it would start discussions with worker representatives regarding their grievances. [Business & Human Rights Resource Centre, 22/06/2020: business-humanrights.org]

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(3).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Provided remedy: Inditex shared that, "[i]n order to reach an agreement the factory has shared its commitment to reinstate the union president." The company has also been trying to "build an agreement" between the Rui Nang factory and the union with the help of the NGO, IndustriALL. Inditex also shared that it would start discussions with worker representatives regarding their grievances. Regarding the Huabo Times factory, the company has been in close contact with the factory and has received feedback that social dialogue has been established with the union. [Business & Human Rights Resource Centre, 22/06/2020: business-humanrights.org] • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Met: Remedy satisfactory to stakeholders: No indication was found that the stakeholders are not considering the remedy to be not satisfactory. • Met: Remedy delivered: No indication was found that the remedy was not delivered as agreed. • Not Met: Independent remedy process used
E(4).0	Serious allegation No 4		<ul style="list-style-type: none"> • Area: FoA/CB; Discrimination • Headline: Acarsoy Tekstil face protests for its alleged anti-union and discriminatory activities in Turkey • Story: Acarsoy Tekstil's female workers have protested against reported dismissal of four women after they unionized against work pressure, mobbing, and sexual harassment. Allegedly, despite constituting 70% of employees, female workers face inhumane conditions, health and safety risks, and get lower wages than men. According to protestors, Inditex's subsidiaries Zara, H&M, and others that source their products from Acarsoy Tekstil ignore the protest. [Bağımsız İletişim Ağı, 21/07/2022, "Feminist Revolt Against Poverty calls for action for Acarsoy": m.bianet.org] [SES, Equality, Justice Women Platform, 18/08/2022, "Celebrities in Turkey Gave Support For The Cause of Women's Workers": esitlikadaletkadin.org]
E(4).1	The Company has responded publicly to the allegation	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Public response: No public response by the Company was found. The Company provided feedback for this allegations, however, it could not be found based on information in the public domain. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response
E(4).2	The company has investigated and taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Engaged with stakeholders • Not Met: Identified cause <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements • Not Met: Stakeholder input to steps taken
E(4).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Provided remedy • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered
E(5).0	Serious allegation No 5		<ul style="list-style-type: none"> • Area: Health & Safety • Headline: Nandan Denim criticized for multiple safety violations following fatal fire at Ahmedabad factory in India • Story: A fire at the Nandan Denim garments factory in Ahmedabad, Gujarat, India, in February 2020, reportedly killed at least seven people. According to fire officials, the factory had just one door, accessible only by climbing up a steep ladder, leaving workers virtually no means of escape. Police investigators have arrested the owner and some employees, after finding the factory in violation of several regulations. Surviving workers have said they work nearly 14 hours a day at a pace that forces them to forego meal or toilet breaks. Nandan Denim on its website has claimed to have commercial ties with US retailers such as Ann Taylor,

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Target, Mango, and Wrangler, though many have denied being customers. Loblaw Companies said one of their approved suppliers may have sourced large volumes of denim from Nandan Denim, while Inditex admitted Nandan Denim has supplied 10,000 pairs of jeans for one of its brands. Nandan Denim's sister company, Nandan Terry, is a supplier to Walmart and H&M. The Textile Labour Association has said all textile factories in Ahmedabad have poor working conditions. [Los Angeles Times, 11/02/2020, "Workers clawed at ladder to door that was only escape from deadly India factory fire": latimes.com] [Clean Clothes Campaign, 17/02/2020, "Deadly Indian factory fire again shows need for preventive safety measures and justice for workers": cleanclothes.org]
E(5).1	The Company has responded publicly to the allegation	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Public response: While the Company admitted one of its brands sourced from the factory, no evidence was found of it addressing the allegation publicly. Score 2 <ul style="list-style-type: none"> • Not Met: Detailed response
E(5).2	The company has investigated and taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Engaged with stakeholders • Not Met: Identified cause Score 2 <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements • Not Met: Stakeholder input to steps taken
E(5).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Provided remedy • Not Met: Evidence for lack of Impact or link: In engagement with the CHRB the Company claims that Nandan Denim never produced garments for Zara, nor for any other Inditex brand. However, it did not provide an explanation for the statement cited by media sources of the Company admitting that Nandan Denim provided jeans for one of its brands, Lefties. [AP, 12/02/2022, "Burned India denim factory had single door reached by ladder": apnews.com] Score 2 <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used

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