

Modern Slavery Statement 2020

This is the third Zalando Modern Slavery Statement and relates to our progress throughout 2019. Our former versions can be found on our [website](#).

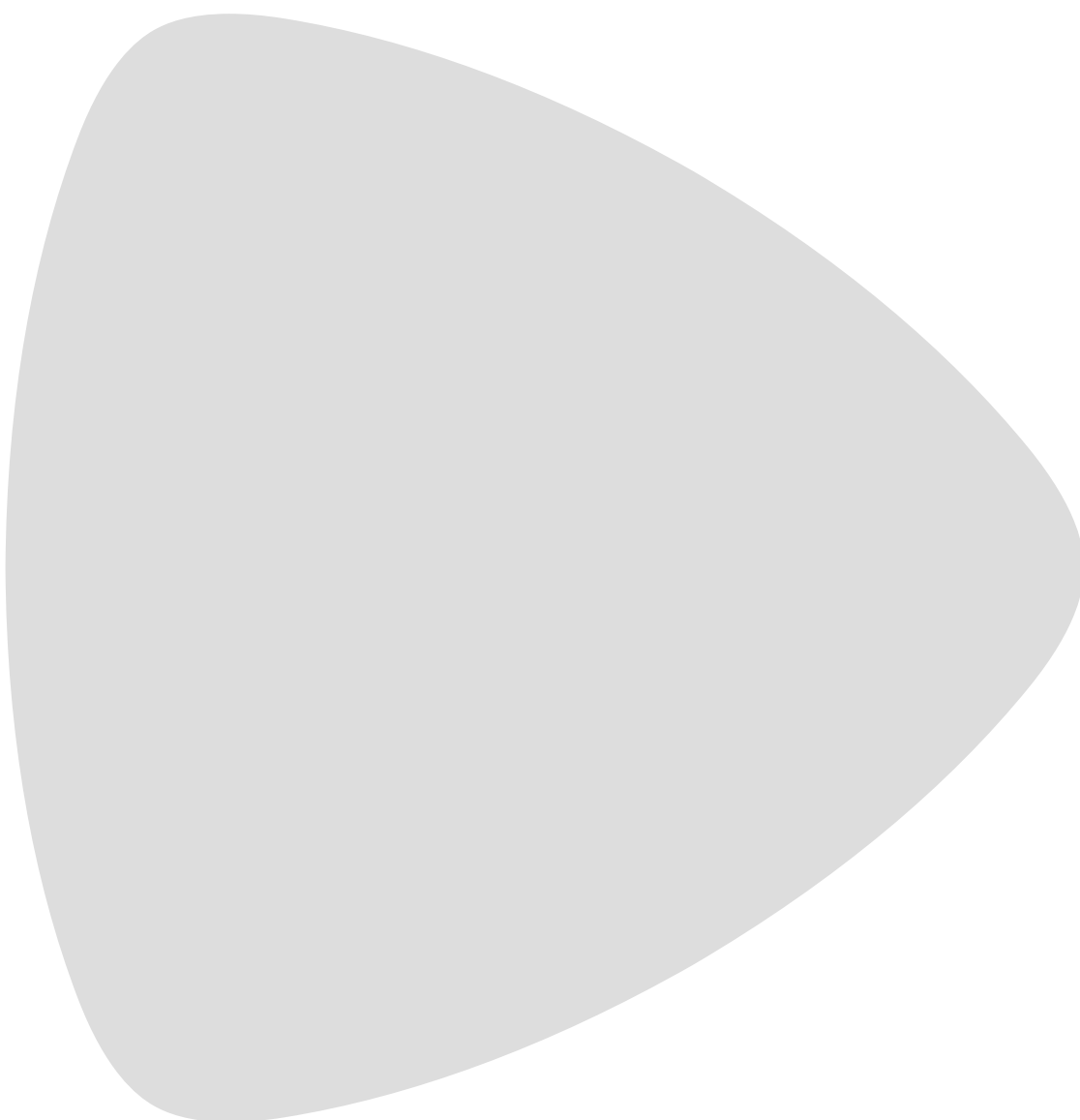


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1. Our Commitment

Human trafficking and forced labor (modern slavery) are human rights violations. ZALANDO SE and all its subsidiaries (hereinafter commonly referred to as Zalando) are committed to respecting internationally recognized human rights in line with the International Bill of Human Rights and the Conventions of the International Labor Organization (ILO) No. 1, 29, 87, 95, 98, 105, 111, 131, 138 and 155.

We acknowledge our responsibility to have the appropriate codes, policies and processes in place to address actual and potential human rights impacts, in line with the United Nations Guiding Principles on Business and Human Rights.

With this aim, we will conduct regular assessments to identify potential impacts, act upon the findings, track responses, and communicate how impacts are addressed.

We will take seriously any allegations that human rights are not respected within our own operations or our supply chain, and will take the adequate steps to address adverse impacts related to our business.

2. Our Business

Zalando is a European online fashion and lifestyle platform. The Berlin-based company offers its customers a one-stop shopping experience with an extensive selection of lifestyle articles including shoes, apparel, accessories, and beauty products, with free delivery and returns.

Zalando's assortment of more than 2,500 international brands ranges from popular global brands to fast-fashion and local brands and is complemented by private label products.

Zalando's offering is extended and enhanced by Zalando Lounge, which offers registered members special offers at reduced prices. The brick-and-mortar outlet stores in Berlin, Frankfurt, Cologne, Leipzig, Hamburg, Hannover, Münster and Stuttgart opened between 2012 and 2019 serve as an additional sales channel for excess inventory.

The parent company, ZALANDO SE, was founded in 2008 and has its registered offices in Berlin, Germany. Beyond our central offices in Berlin, we have offices, e.g., in Dortmund, Dublin and Helsinki.

We serve customers in 17 European markets: Austria, Belgium, the Czech Republic, Denmark, Finland, France, Germany, Ireland, Italy, Luxembourg, the Netherlands, Norway, Poland, Spain, Sweden, Switzerland and the United Kingdom.

Beyond the products that we sell on our online fashion platform, our supply chain is also composed of the procurement of non-stock items and services, such as packaging and logistic services. Customer care and fulfillment services are provided by both Zalando teams and external service providers. For our transportation to and from customers we work with logistics service providers.

Human Rights in our do.MORE strategy

do.MORE is our new sustainability strategy setting out our bold vision to be a sustainable fashion platform with a net-positive impact for people and the planet. Having a net-positive impact means that we run our business in way that gives back more to society and the environment than we take. This is because “less bad” isn’t good enough anymore, and we’ll continuously work to reduce the negative impact of our business, while increasing the value we create for people and planet.

This is a vision for the long term, but we’re taking our first steps since announcing, in October 2019, clear focus areas and ambitious commitments. As part of our strategy, we have set the following target related to human rights: By 2023, we have continuously increased our ethical standards and only work with partners who align with them.

Zalando is managed by its ultimate parent company, ZALANDO SE, which bundles all management functions and generates the vast majority of group revenues. In addition to the parent company, Zalando is comprised of 48 subsidiaries that operate, inter alia, in the areas of fulfillment, customer service, payments, product presentation, advertising and marketing. ZALANDO SE has control over all subsidiaries, either indirectly or directly. As a result, group reporting essentially corresponds to the reporting for ZALANDO SE.

2.1 Facts and Figures 2019

around 14,000 employees	11 logistics fulfillment centers currently operating	more than 5,600 employees in our own Zalando Logistics fulfillment centers	more than 31m active customers
more than 2,500 third-party brands	assortment of more than 500,000 articles	5 active Private Label brands	5–10% of our revenue comes from our private labels
15 sourcing countries of our private labels	131 sourcing partners of our private labels	212 factories of Tier 1 sourcing partners of our private labels	around 65,000 workers in Tier 1 factories of our private labels’ sourcing partners

3. Progress Against Our 2019 Commitments

We acknowledge that our industry is an at-risk sector for human rights violations and therefore take steps to prevent, detect and respond to modern slavery. Thus, throughout 2019, we worked to strengthen our procedures in line with the next steps established in our **Modern Slavery Statement 2019**.

Steps planned for 2019		Our progress
1. Strengthen over-arching approach to respecting human rights throughout Zalando group	<p>Further develop our human rights risk assessment through in-depth analysis of key business units and close collaboration with the Risk team</p> <p>Further strengthen our business partner checks process</p>	<p>As planned, we conducted in-depth human rights risk analysis of key business units. This analysis provided key inputs to review our human rights approach as part of our new sustainability strategy: do.MORE.</p> <p>We amended our Compliance Checks on Business Partners Group Policy and included e.g. Packaging and Logistics Services into the scope of mandatory business partner checks, increased the depth of our third-party due diligence and the number of checks that were carried out.</p>
2. Strengthen measures to prevent risk of modern slavery in supply chain of our private labels	<p>Disclose list of zLabels¹ strategic Tier 1 suppliers</p> <p>Sustain 25 % of our business volume being sourced from factories participating in our Factory Improvement Program (FIP)²</p>	<p>As planned, we disclosed the list of strategic Tier 1 suppliers for our private labels on our website.</p> <p>In 2019, almost 29% of our business volume was sourced from factories participating in the FIP.</p>
3. Strengthen measures to prevent risk of modern slavery in logistics supply chain	<p>Further increase transparency in our logistics supply chain</p> <p>Review our social audit process to further increase robustness and accuracy</p>	<p>As planned, we worked together with our diverse logistics teams to centrally map and assess risks related to our service providers for fulfillment and transportation services. More details about our logistics network is provided below.</p> <p>In 2019, we changed the auditing company to work with a partner that has extensive European coverage to meet the growing number of locations. Our new partner also offers its own pool of qualified auditors that know how to target the national market specifics and at the same time guarantees an aligned audit methodology.</p>

¹ Zalando refined its private label assortment to pursue a complementary strategy with our partner brands. As a consequence, the private label business within and under the name of zLabels GmbH was discontinued as of April 1, 2019 and the remaining five labels have been integrated into the Zalando Fashion Store business.

² Our Factory Improvement Program (FIP) was partly concluded in 2019

4. Governance & Policies

4.1 Governance

As informed in our 2019 statement, four teams collaborate closely in the Human Rights and Modern Slavery Working Group, composed by representatives from Compliance & Business Ethics, Corporate Responsibility & Sustainability (CR&S), Ethical Trade and the International Standards & Relations teams:

The **Compliance & Business Ethics** team manages Zalando's group-wide Compliance Management System to foster compliance with applicable laws, internal regulation and ethical standards along our businesses, including our business partner checks process. The Compliance & Business Ethics team also manages investigations following tip-offs via our whistleblowing tool.

The **CR&S** team defines the sustainability strategy for the Zalando group and is responsible for Zalando's overall approach to human rights risk assessment and due diligence strategy. The team regularly updates Zalando's General Counsel on steps taken to prevent and detect human rights and receives guidance on priorities and actions.

Our **Ethical Trade** team works to ensure that our fashion partners comply with our standards. With the integration of private labels in the Zalando Fashion Store business, the Ethical Trade team continues to manage our Ethical Trade Program for the remaining 5 private labels and is now also responsible for developing a brand assessment approach for third-party brands.

The **International Standards & Relations** team within P&O is responsible for the organisation of the social compliance audits in logistics. Through social standards we want to ensure fair and decent working conditions at our fulfilment centers and those of our business partners in our logistics supply chain.

4.2 Policies

As reported in our 2019 statement, our expectations towards all our employees and business partners are set forth in our policies which highlight, among others, the imperative respect for human rights in all our business activities. Additionally, in 2019 we updated our Compliance Checks on Business Partners Policy. The Compliance and CR&S teams review and update these policies on a regular basis.

Code of Ethics	Code of Conduct	Ethical Sourcing Standards	Compliance Checks on Business Partners Group Policy
<p><u>Zalando's Code of Ethics</u> sets out Zalando's specific expectations towards every employee regarding social and ethical behavior. The Code of Ethics has been communicated to our employees in various languages and is publicly available on our website.</p>	<p>Our commitment to avoid human trafficking and forced labor in our supply chain is underpinned in our <u>Code of Conduct for Business Partners</u>. It was established in 2013 and last reviewed in 2017. It is issued by ZALANDO SE's Management Board and applies group-wide to our business partners. The Code of Conduct expressly prohibits the use of forced, bonded, indentured and prison labor, as well as the slavery or trafficking of persons in any form.</p>	<p>Complementary to our Code of Conduct, our <u>Ethical Sourcing Standards</u> set additional standards that all third-party brands, as well as our private labels, must comply with. It includes our commitment to the non-use of materials containing cotton sourced from Uzbekistan or Turkmenistan due to ongoing concerns regarding the use of government backed, state-orchestrated systems of forced labor in cotton cultivation in these countries.</p>	<p>This Group Policy governs the scope and process for carrying out the compliance check on third-party business partners and applies to all employees of ZALANDO SE and its subsidiaries.</p>

5. Risk Assessment & Management

5.1 Assessing Risks

As planned, we conducted an in-depth risk analysis of key business units to improve our understanding of human rights risks in our value chain and foster corresponding mitigation measures. Through this approach, we looked to identify the factors that can lead to potential human rights violations, including modern slavery, at each main stage of our value chain. These factors relate mainly to activities in high risk countries, activities in high risk industries and control deficiencies.

Fashion Value Chain		Factors that can lead to a potential violation of human rights, including modern slavery	How Zalando mitigates these risks
01	Design	No risk identified.	
02	Raw materials	Raw materials and component production for the fashion industry can involve exploitative labour practices, mainly in high risk countries. Global and complex supply chains make traceability a challenge.	We have a direct relationship with our Tier 1 suppliers. For suppliers further down the supply chain we are firstly increasing transparency and secondly require our fashion suppliers to adhere to the standards laid out in our policies e.g. the non-use of materials containing cotton sourced from Uzbekistan or Turkmenistan as per our Ethical Sourcing Standards.
03	Material and component production		
04	Product Manufacturing	Certain workers may be more vulnerable to exploitative labour practices, especially in high risk countries. For instance, “migrant workers are more exposed to certain forms of forced labour, particularly those with an irregular status, whose vulnerability can be exploited through coercion.” ³	<p>Private labels → Suppliers for final production processes are our Tier 1. We require these to comply with our Code of Conduct and we conduct due diligence of production sites through our Ethical Trade Program for private labels.</p> <p>Third-party brands → We do not have a direct relation with the manufacturing suppliers. Therefore, our Code of Conduct requires brands to conduct an appropriate due diligence process in their supply chain. We are setting up a brand assessment approach for third-party brands and we will provide guidance and support where needed.</p>

³ OECD (2017), OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector, 129

Fashion Value Chain		Factors that can lead to a potential violation of human rights, including modern slavery	How Zalando mitigates these risks
05	Inbound Transportation	Transportation chains are complex, and subcontracting is commonly used. The sector relies on large, low-skilled workforces and usually resorts to recruitment agencies. ⁴ Certain workers may be more vulnerable to exploitative labour practices, especially in high risk countries.	Our Code of Conduct applies to all partners, including those providing transportation to our warehouses. We will look into strengthening our due diligence especially where we have a direct relationship.
06	Procurement and buying	Insufficient due diligence by third-party brands sold at Zalando may lead to the risk of exploitative labour practices in the upstream supply chain.	Our Code of Conduct requires brands to conduct an appropriate due diligence process in their supply chain. We are setting up a brand assessment approach for third-party brands and we will provide guidance and support where needed.
07	Fulfillment	Our logistics sites are located in countries classified as low risk for modern slavery. ⁵ Nevertheless, the presence of low-skilled and agency workers may increase the risk of exploitative labor practices. Migrant workers have been identified as a vulnerable group in this case.	Our own fulfillment centers and the logistics sites of our partners are audited against our social standards. Various bodies of employee participation (i.e. works councils, round tables) are actively engaged in improving the environment at our own fulfillment centers. For the logistics sites managed by our partners, we see it as our role to monitor the audit results and to engage to ensure responsible business conduct.
08	Fashion store	Workers in customer care activities may face long and irregular working hours, temporary job tenure and low protection, especially in high risk countries. ⁶ As we have increased the number of business partners that support us with our Customer Care in different countries, we see the risk of exploitative labour practices.	As we have a direct business relationship with these service providers, we have established contract requirements and are setting up due diligence processes through auditing systems and direct engagement.

⁴ BSR, 10 Human Rights Priorities for the Transport and Logistics Sector – https://www.bsr.org/reports/BSR_Primer_Human_Rights_Transport_Logistics.pdf

⁵ Global Slavery Index – <https://www.globallslaveryindex.org/2018/data/maps/#prevalence>

⁶ ILO (2015), Employment relationships in telecommunications services and in the call centre industry, 19 – https://www.ilo.org/wcmsp5/groups/public/-/-ed_dialogue/-/-sector/documents/publication/wcms_409415.pdf

Fashion Value Chain		Factors that can lead to a potential violation of human rights, including modern slavery	How Zalando mitigates these risks
09	Distribution	Transportation chains are complex, and subcontracting is commonly used. The sector relies on large, low-skilled workforces and usually resorts to recruitment agencies. ⁷ Certain workers may be more vulnerable to exploitative labour practices, especially in high risk countries. Our distribution network is located in countries classified as low risk for modern slavery. ^{8,9}	As we have a direct business relationship with these service providers, we see our role as establishing contract requirements and due diligence processes through auditing systems and direct engagement.
10	Use	No risk identified.	
11	End of use & reuse	No risk identified.	

5.2 Managing Risks in our Private Labels Supply Chain

Zalando refined its private label assortment to pursue a complementary strategy with our partner brands. As a consequence, the private label business within and under the name of zLabels GmbH was discontinued as of April 1, 2019 and the remaining five labels (Anna Field, Even&Odd, Friboo, Pier One, ZIGN) have been integrated into the Zalando Fashion Store business.

For these five labels, we source products from 15 different countries, and currently work with 131 sourcing partners and 212 factories, a nearly 50% decrease in comparison to 2018. Due to the size and variety of our assortment, we do not own any of the factories in our supply chain and therefore focus on strengthening our relationships with key sourcing partners.

Gaining transparency throughout our supply chain is an important focus for us. In 2019, we disclosed the list of our strategic Tier 1 suppliers (representing 80% of sourcing volume), and 100% of Tier 1 suppliers for our private label ZIGN. Within this list, our five main sourcing countries were China, Bangladesh, India, Turkey and Portugal, and we also source from Cambodia, Italy, Moldova, the Netherlands, Romania, Spain, Ukraine and Vietnam.

As reported in our previous statement, our Ethical Trade Program for our private labels was first established in 2014 and looks to ensure that our sourcing partners comply with our Zalando group-wide Code of Conduct and treat workers with dignity. Our Program includes the following:

⁷ BSR, 10 Human Rights Priorities for the Transport and Logistics Sector – <https://www.bsr.org/en/our-insights/primers/10-human-rights-priorities-for-the-transport-and-logistics-sector>

⁸ Global Slavery Index – <https://www.globallslaveryindex.org/2018/data/maps/#prevalence>

⁹ Global Slavery Index – <https://www.globallslaveryindex.org/2018/data/maps/#prevalence>

1. As part of our **onboarding process**, new sourcing partners must agree to our Code of Conduct and provide an audit report from the last twelve months. Factories must meet all ethical requirements before orders can be placed. If critical findings are observed, we do not begin the relationship without evidence that they have been corrected. In the past year, we rejected the onboarding of 14 factories due to non-compliance.
2. For **existing factories**, we require new audits every twelve months to monitor and reassess factory conditions. If a critical instance of non-compliance is found at an existing factory, the factory has seven months to remediate the critical instance along with a new audit. We require evidence of improvement to continue our relationship with the sourcing partner. In 2019, we evaluated 283 audit reports for new and existing factories.
3. We evaluate all factory audits against our standards and a **Corrective Action Plan (CAP)** is issued if necessary. As members of the Social Labor and Convergence Project¹⁰, we have aligned our audit program with their standards to reduce audit fatigue across the industry.
4. Our team conducts **factory visits** and works closely with our partners to develop customized improvement plans to address specific social challenges. In 2019, our team conducted 27 factory visits.
5. Our **Supplier Partnership Program (SPP)**, led by our Sourcing Team, evaluates sourcing partner performance across a range of areas, of which Ethical Trade requirements contribute 12.75% to the score, to improve performance and incentivize high-performing sourcing partners.
6. **Our Factory Improvement Program (FIP)** was concluded in 2019, including the China Factory Improvement Collaboration (CFIC) program and Benefits for Business and Workers (BBW). Projects with the International Labour Organisation (ILO), the German Corporation for International Cooperation (GIZ) and Swasti will continue into 2020.

Apart from the Zalando-wide policies mentioned further above, we also have specific policies for our private label business on contract workers, homeworkers and migrant workers.

We believe that respecting workers' rights to freely associate and to collectively bargain are key for the realization of other labour rights. We are a member of ACT (Action, Collaboration, Transformation), a multi-stakeholder agreement to progress towards living wages through collective bargaining at industry level.

In 2019, we also worked to increase visibility of Tier 2 and 3 suppliers, with a focus on cotton and leather. We aim to continuously increase the sourcing of leather from manufacturers audited and certified by the Leather Working Group protocol and the volume of cotton sourced as Better Cotton.

¹⁰ <https://slconvergence.org/>

5.3 Managing Risks in our Third-party Labels Supply Chain

All brands sold on our platform must agree with our Code of Conduct and our Ethical Sourcing Standard before starting business.

In line with our 2023 Sustainability Strategy do.MORE, Zalando has committed **to only working with partners who meet our ethical standards**. To address this, we decided to implement an assessment framework for brands that are selling on our Fashion Store. For this, we selected the Higg Brand and Retail Module (BRM¹¹) developed by the Sustainable Apparel Coalition (SAC). As many large brands are already members of the SAC, choosing the BRM as our brand assessment tool allows for closer and smoother collaboration between all parties. As part of this push towards industry-wide change, we will be using the data we receive to understand where the challenges lie, to measure brand performance and supply chain impacts, share trends, and collaborate with brands to drive meaningful improvement.

Our Efforts to Increase Transparency in the Fashion Supply Chain

We believe that increasing supply chain traceability and transparency is an important step to protect the workers of the fashion value chain.

In 2018, we launched zImpact, our accelerator program, to scale innovative digital solutions to increase supply chain transparency. Since the beginning of the program, we have supported more than 40 startups, initiatives and NGOs with visibility, funding and the expertise of our employees.

We are participating in the Organic Cotton Traceability Pilot, which was initiated in 2018 by the partner organisations such as Fashion for Good, C&A Foundation and the Organic Cotton Accelerator to test and validate on-product markers in combination with blockchain technology to trace organic cotton from farms to the gin where it is processed for textile use.

¹¹ <https://apparelcoalition.org/higg-brand-tool/>

5.4 Managing Risks in our Logistics Network

We are constantly reviewing and expanding our logistics network to efficiently serve our customers throughout Europe.

Our Fulfillment Centers and Inbound Distribution Centers



The fulfillment centers Brieselang¹², Erfurt, Lahr, Mönchengladbach and Ludwigsfelde are operated by Zalando, whilst all other logistic sites are operated by third-party fulfillment partners.

Since 2012, we have set out our expectations for our own logistic sites and those of our partners in clear social standards, and we have implemented an auditing system to assess compliance. Our social standards are based on our Code of Conduct as well as additional relevant local regulations and cover key topics such as equal opportunities, remuneration, working hours and freedom of association.

Compliance with our social standards is reviewed twice a year for all Zalando logistics sites through an audit by an external auditor. Equally, compliance with our social standards is also reviewed twice a year at logistics sites managed by our partners. With the audits, we want to assess whether we and our business partners fulfill our expectations regarding decent working standards. The results of the audits form the basis to agree on measures to address the findings at the sites. Zalando monitors the implementation of these measures through regular meetings.

¹² Brieselang was taken over by a fulfillment partner as of April 1, 2019

Additionally, our employees help us to further develop the work experience in our fulfillment centers. Various bodies of employee participation (i.e. works councils, round tables) are actively engaged in improving the environment at their respective sites. We promote various opportunities for dialogue between employees and management by asking our employees, such as in engagement surveys or personal interviews, for feedback and ideas on how we can make working at Zalando an even better experience.

As planned, we looked to further increase robustness and accuracy of our social audits. For that, in 2019, we changed the auditing company to work with a partner that has extensive European coverage to meet the growing number of locations. The partner offers its own pool of qualified auditors that know how to address the national market specifics and at the same time guarantees an aligned audit methodology.

Also, in 2019, we further strengthened our Compliance Checks on Business Partners. Before starting business with service providers of certain commodities, a comprehensive partner check is conducted, which includes corruption and human rights violations topics. An initial assessment is handled by a specialized service provider and is the basis for the Compliance and Business Ethics team to decide where further investigation is needed. Depending on the findings, a decision might be taken to not initiate business with the potential partner. Where existing business relationships are to be extended or expanded after a three-year period, a new check process must take place.

All logistics service providers are checked and, depending on the results, we may choose not to accept certain suppliers.

We believe that we can nonetheless improve our practices. Our transportation services, including deliveries, are provided by business partners. In line with our do.MORE strategy, we will expand our due diligence practices in logistics to include proactive checks of our transportation service providers.

5.5 Managing Risks in our Customer Care

Our Customer Care teams are constantly striving for outstanding customer satisfaction. Part of our customer care services are executed by Zalando employees and another part by service providers. Our own employees are based in Customer Care offices located in Berlin, which go through annual audits conducted by external auditors to verify compliance with our social standards. Therefore, we do not see any risk of forced labor among our own employees.

Service providers offering customer services for Zalando must agree with our Code of Conduct and go through our Compliance Checks on Business Partners process before starting business. Site visits take place before starting a new partnership. In line with our do.MORE strategy, we will expand our audits to Customer Care executed by service providers.

5.6 Training

Training on business integrity, including our Code of Ethics and our Code of Conduct, continues to be mandatory for each Zalando employee with a Zalando e-mail address. The training reinforces awareness of the relevant regulatory framework, internal rules and regulations and provides information regarding the established processes within the Compliance Management System. Attendance of trainings and completion of e-learning is monitored by the Compliance and Business Ethics team.

In 2019, two training sessions on human rights risks related to Customer Care and Business Process Operations (BPO) activities were held for the related teams.

In October 2019, our Vendor Summit for suppliers of our private labels was held in Berlin, Germany and was attended by 76 of our sourcing partners. Through a series of workshops and panel discussions, we engaged our business partners to collaborate and build stronger partnerships.

5.7 Grievance Mechanisms

Zalando has a compliance management system to prevent non-compliance with its standards and to allow appropriate response. We offer different channels for both employees and externals to report possible violations. We have put in place a whistleblowing tool managed and hosted by an external service provider which is available in several languages and provides the possibility of remaining anonymous. In addition, our Compliance & Business Ethics Team can be directly contacted through various channels (email, chat, in person, telephone).

Employees and temporary staff at Zalando's fulfillment centers and customer care offices can, in addition, address any concerns to social workers.

Through our Code of Conduct, we require our business partners to provide their own feedback mechanism to allow non-compliances with the law or with Zalando Code of Conduct to be reported anonymously, providing protection of identity and assurance of no negative consequence.

6. Our Next Steps

Together with the different departments, we are working to create a detailed roadmap to achieve the goals defined in our do.MORE strategy. In line with the target “By 2023, we have continuously increased our ethical standards and only work with partners who align with them”, we are committed to taking the following steps in 2020:

1. Supply chain transparency for Private Labels	<ul style="list-style-type: none">• Increase transparency and disclose deeper levels of our supply chain on an ongoing basis
2. Review our process to enforce standards in a company-wide blueprint	<ul style="list-style-type: none">• Define overarching approach for onboarding and monitoring of all prioritized suppliers (fashion brands, logistics, customer care)• Revise minimum standards
3. Third-party brands	<ul style="list-style-type: none">• Launch of brand assessment tool to first phase of brands• Pilot with selected brands to identify specific needs when it comes to assessment• Continue close partnership with SAC and Higg Co. to ensure robustness of assessment tool and data tracking
4. Expand our due diligence practices in distribution and customer care	<ul style="list-style-type: none">• Develop format to proactively check distribution and customer care service providers• Conduct pilot and implementation in prioritized suppliers

This statement has been published in accordance with the UK Modern Slavery Act and summarizes our steps taken against human rights violations including but not limited to modern slavery during the financial year ending 31 December 2019. It was prepared by the CR&S team. The statement has been approved and signed by



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