

KnowTheChain 2023 Apparel & Footwear Benchmark

Additional Disclosure

Company Name: Zalando SE

Date: 14 Sep 2023

Guidance:

- Please add any additional information you wish to provide under the relevant indicator elements below.
- We welcome examples of leading practices.
- Unless you are sharing leading practices, please limit the information to indicators for which KnowTheChain could not yet identify sufficient information on your website.
- Note **KnowTheChain has already undertaken a review of your website**. Should you wish to include links to existing disclosure, please specify the page number / section you are referring to.

INDICATOR 2: MANAGEMENT AND ACCOUNTABILITY

2.3 has tasked a board member or board committee with oversight of its supply chain policies that address forced labour, and describes how the experiences of affected workers or relevant stakeholders (such as civil society, unions, and workers or their representatives) informed board discussions.

Response from Zalando:

[Zalando's Policy Statement on Zalando's Human Rights Strategy](#) has been adopted by the Management Board of Zalando. Responsibility for implementation is delegated to the Human Rights Officer (HRO) who is leading the dedicated Ethical Responsibility team. The HRO will regularly report to the Management Board and to the Sustainability Forum on progress and impact.

This Human Rights Policy specifies the expectations and requirements Zalando has towards all Business Partners in its supply chain including suppliers, service providers, platform partners, distributors, consultants, agents and subcontractors.

Our human rights risk management approach analyses and prioritises salient human rights issues, including forced labour. Our annual human rights risk assessment identified modern slavery as one of the prioritised human rights related risks.

We also recognise that the nature of risks can evolve over time and that changes to business operations can impact the saliency of the priority human rights issues that we must address which is why the priority risks are re-evaluated annually. (from p.3-4 of the policy)

INDICATOR 7: RECRUITMENT-RELATED FEES

7.1 requires that no worker in its supply chains should pay for a job—the costs of recruitment-related fees should be borne not by the worker but by the employer ("Employer Pays Principle");

Response from Zalando:

We prohibit any recruitment-related fees that are borne by the workers. This requirement is included in our Private Labels Migrant Worker Policy which is a part of our contractual agreement with all our Private Labels suppliers “Business Partners must ensure that under no circumstances are Migrant Workers required to pay a deposit, bond, or fees to obtain employment, including recruitment fees, renewal fees, transportation fees, or other miscellaneous costs and they must not be bonded by other loans or fees.”