



Brand Performance Check

Zalando SE

Publication date: November 2025

This report covers the evaluation period 01-01-2024 to 31-12-2024

About the Brand Performance Check

Fair Wear Foundation (Fair Wear) believes that improving conditions for apparel product location workers requires change at many levels. Traditional efforts to improve conditions focus primarily on the product location. Fair Wear, however, believes that the management decisions of clothing brands have an enormous influence for good or ill on product location conditions.

Fair Wear's Brand Performance Check is a tool to evaluate and report on the activities of Fair Wear's member companies. The Checks examine how member company management systems support Fair Wear's Code of Labour Practices. They evaluate the parts of member company supply chains where clothing is assembled. This is the most labour intensive part of garment supply chains, and where brands can have the most influence over working conditions.

In most apparel supply chains, clothing brands do not own product locations, and most product locations work for many different brands. This means that in most cases Fair Wear member companies have influence, but not direct control, over working conditions. As a result, the Brand Performance Checks focus primarily on verifying the efforts of member companies. Outcomes at the product location level are assessed via audits and complaint reports, however the complexity of the supply chains means that even the best efforts of Fair Wear member companies cannot guarantee results.

Even if outcomes at the product location level cannot be guaranteed, the importance of good management practices by member companies cannot be understated. Even one concerned customer at a product location can have significant positive impacts on a range of issues like health and safety conditions or freedom of association. And if one customer at a product location can demonstrate that improvements are possible, other customers no longer have an excuse not to act. The development and sharing of these types of best practices has long been a core part of Fair Wear's work.

The Brand Performance Check system is designed to accommodate the range of structures and strengths that different companies have, and reflects the different ways that brands can support better working conditions.

This report is based on interviews with member company employees who play important roles in the management of supply chains, and a variety of documentation sources, financial records, supplier data. The findings from the Brand Performance Check are summarized and published at www.fairwear.org. The online [Brand Performance Check Guide](#) provides more information about the indicators.

Scoring overview

Total score: 100

Possible score: 204

Benchmarking Score: 49

Performance Benchmarking Category: Good



Summary:

Zalando SE (Zalando) has met most of Fair Wear's performance requirements. With a total benchmarking score of 49, the member is placed in the Good category.

Zalando joined Fair Wear in 2024 with its private label brands, including Anna Field, Even&Odd, Friboo, Pier One, Yourturn, and ZIGN. These brands are managed centrally and have an aligned approach to purchasing and supplier management. Zalando has a central approach to Human Rights Due Diligence, which it applies to its private label operations and the way the company conducts its private label supply chain.

Zalando has a sourcing strategy addressing influencing labour conditions. Since 2019, Zalando has consolidated its supply chain to increase its influence in production locations. In 2025, Zalando extended its sourcing approach to explicitly focus on increasing influence through active cooperation with other clients at shared factories.

Zalando conducts country risk scoping and includes all eight labour standards. Based on the score for each country, the member prioritises specific risks in specific countries. The risk scoping includes gender as a stand-alone topic for each country. Zalando has identified the risks to Freedom of Association (FoA) in all its sourcing countries and can explain the main risks per country, including those affecting women workers. Although it has identified restricted freedom of association as a zero-tolerance issue, it has not translated this into its sourcing strategy to guide the selection of production countries.

Zalando has a systematic approach to assessing human rights risks in its supply chain and has evaluated the risks for each production location. Zalando sources from 18 production locations in Bangladesh, accounting for 24% of its total FOB volume. The member company has signed the International Accord.

This first performance check for Zalando shows a solid basis and room for improvement. In general, the member has initiated the development of various procedures, and the next performance check will assess the results of implementing these procedures. In addition, Fair Wear recommends that Zalando ensure complete insight into its supply chain, including supporting processes such as printing and embroidery. Additionally, Zalando should review its contracts to ensure that they do not impose an unequal burden on its suppliers or include terms that limit the implementation of the Code of Conduct.

Performance Category Overview

Leader: This category is for member companies who are doing exceptionally well, and are operating at an advanced level. Leaders show best practices in complex areas such as living wages and freedom of association.

Good: It is Fair Wear's belief that member companies who are making a serious effort to implement the Code of Labour Practices—the vast majority of Fair Wear member companies—are 'doing good' and deserve to be recognized as such. They are also doing more than the average clothing company, and have allowed their internal processes to be examined and publicly reported on by an independent NGO. The majority of member companies will receive a 'Good' rating.

Needs Improvement: Member companies are most likely to find themselves in this category when major unexpected problems have arisen, or if they are unable or unwilling to seriously work towards CoLP implementation. Member companies may be in this category for one year only after which they should either move up to Good, or will be moved to suspended.

Suspended: Member companies who either fail to meet one of the Basic Requirements, have had major internal changes which means membership must be put on hold for a maximum of one year, or have been in Needs Improvement for more than one year. Member companies may remain in this category for one year maximum, after which termination proceedings will come into force.

Categories are calculated based on a combination of benchmarking score and the percentage of own production under monitoring. The specific requirements for each category are outlined in the Brand Performance Check Guide.

Company Profile Zalando SE

Member company information

Member since: 7 Mar 2024

Product types: Garments, clothing, fashion apparel

Percentage of turnover of external brands resold 0%

Member of other MSI's/Organisations International Accord - Bangladesh

Number of grievances received last financial year 5

Basic requirements

Definitive production location data has been submitted for the financial year under review? Yes

Projected production location data have been submitted for the current financial year? Yes

Membership fee has been paid? Yes

Production countries, including number of production locations and total production volume.

Production Country	Number of production locations	Percentage of production volume
China	89	56.48%
Bangladesh	18	24.14%
Türkiye	10	8.71%
India	9	5.26%
Viet Nam	4	2.21%
Morocco	6	1.26%
Italy	4	0.63%
Portugal	3	0.58%
Ukraine	1	0.55%
Spain	2	0.13%
Albania	1	0.04%

Layer 1 Foundational system's criteria

Possible Points: 8

Earned Points: 7

1.1 Member company has a publicly shared Human Rights Due Diligence policy that has been adopted by top management.: [Yes](#)

1.2 All member company staff are made aware of Fair Wear's membership requirements, in particular the Fair Wear's HRDD policy and Fair Wear's Code of Labour Practices.: [Yes](#)

1.3 All staff who have direct contact with suppliers are trained to support the implementation of Fair Wear requirements, in particular the Fair Wear's HRDD policy and Fair Wear's Code of Labour Practices.: [Yes](#)

1.4 A specific staff person(s) is designated to follow up on problems identified by the monitoring system, including grievance handling. The staff person(s) must have the necessary competence, knowledge, experience, and resources.: [Yes](#)

1.5 Member company has a system in place to identify all production locations, including a policy for unauthorised subcontracting.: [Yes](#)

1.6 Member company discloses internally through Fair Wear's information management system, in line with Fair Wear's Transparency Policy.: [Yes](#)

Comment: [Zalando discloses 100% of production locations internally through Fair Wear's information management system.](#)

1.7 Member company discloses externally on Fair Wear's transparency portal, in line with Fair Wear's Transparency Policy.: [Yes](#)

Comment: Zalando discloses 100% of production locations externally on Fair Wear's transparency portal.

1.8 Member complies with the basic requirements of Fair Wear's communication policy.: No

Comment: Zalando only communicated about its Fair Wear membership in its Annual Report.

Requirement: Fair Wear membership should be communicated according to the Fair Wear communications policy.

Layer 2 Human rights due diligence, including sourcing strategy and responsible purchasing practices.

Possible Points: 90

Earned Points: 50

Indicators on Sourcing strategy

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.1 Member company's sourcing strategy is focused on increasing influence to meaningfully and effectively improve working conditions.	Advanced	Fair Wear expects members to adjust their sourcing strategy to increase their influence over working conditions. Members should aim to keep the number of production locations at a level that allows for the effective implementation of responsible business practices.	Strategy document; consolidation plans, examples of implementation.	6	6	0

Comment: Zalando has a sourcing strategy addressing influencing labour conditions. The member has 147 active suppliers. 58% of the production volume comes from suppliers where the member has at least a 10% leverage. 58% of the production volume comes from suppliers where Zalando buys less than 2% of its total FOB. Since 2019, Zalando has consolidated its supply chain to increase its influence in production locations. In 2025, Zalando extended its sourcing approach to explicitly focus on increasing influence through active cooperation with other clients at shared factories.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.2 Member company's sourcing strategy is focused on building long-term relationships.	Basic	Stable business relationships underpin the implementation of the Code of Labour Practices and give factories a reason to invest in improving working conditions.	Strategy documents; % of FOB from suppliers where a business relationship has existed for more than five years; Examples of contracts outlining a commitment to long-term relationship; Evidence of shared forecasting.	2	6	0

Comment: Zalando has a sourcing strategy that focuses on maintaining long-term relationships with suppliers and production locations. In its sourcing strategy, the company explicitly focuses on ensuring that its suppliers maintain a stable production base. The goal is to achieve a low turnover rate within a five-year period. 66% of the member's total FOB volume comes from suppliers with whom Zalando has a business relationship for at least five years.

With some suppliers, Zalando shares its growth plans and has established a contractual agreement for the budget allocated for the coming year; however, the member does not commit to long-term contracts yet.

Recommendation: Fair Wear recommends Zalando to commit to long-term contracts.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.3 Member company conducts a risk scoping exercise as part of its sourcing strategy.	Basic	Human rights due diligence, according to the OECD guidelines, requires companies to undertake a scoping exercise to identify and mitigate potential human rights risks in supply chains of potential business partners.	HRDD policy; Sourcing strategy linked to results of scoping exercise; HRDD processes, including specific responsibilities of different departments; Use of country studies; Analysis of business and sourcing model risks; Use of licensees and/or design collaborations.	2	6	-2

Comment: Zalando is a member of the International Accord in Bangladesh and Pakistan. Zalando conducts country risk scoping and includes all eight labour standards. It combines information from Fair Wear resources, Verisk Maplecroft, media monitoring, and NGOs to evaluate the risks for a specific country. Based on the score for each country, the member prioritises specific risks in specific countries. In its risk scoping, the member has accurately assessed the impact and prevalence of the risks. The risk scoping includes gender as a stand-alone topic for each individual country. Zalando has not included a gender lens for each of the eight labour standards. Although it has identified restricted freedom of association as a zero-tolerance issue, it has not translated this into its sourcing strategy to guide the selection of production countries. The risk scoping does not include specific product-level, sourcing model, or business model risks for its private labels.

Recommendation: Fair Wear recommends Zalando to include all risk factors in its risk scoping.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.4 Member company engages in dialogue with factory management about Fair Wear membership requirements before finalising the first purchase order.	Intermediate	Sourcing dialogues aim to increase transparency between the member and the potential supplier, which can benefit improvements efforts going forward.	Process outline to select new factories; Material used in sourcing dialogue; Documents for sharing commitment towards social compliance; Meeting reports; On-site visits; Reviews of suppliers' policies.	2	4	0

Comment: Zalando joined Fair Wear in 2024. Since then, it has informed its suppliers about its Fair Wear membership. It also adjusted the standard process to inform new suppliers about its HRDD policy by including references to the Fair Wear membership. However, the brand has not yet had a dialogue with its suppliers about Fair Wear's requirements and how to cooperate in implementing them.

Recommendation: Fair Wear recommends that Zalando engages in a dialogue with the supplier about Fair Wear requirements and how to cooperate in implementing these.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.5 Member company collects the necessary human rights information to inform sourcing decisions before finalising the first purchase order.	Intermediate	Human rights due diligence processes are necessary to identify and mitigate potential human rights risks in supply chains. Specific risks per factory need to be considered as part of the decision to start cooperation and/or place purchasing orders.	Questionnaire with CoLP, reviewing and collecting existing external information, evidence of investigating operational-level grievance system, union and independent worker committee presence, collective bargaining agreements, engaging in conversations with other customers and other stakeholders, including workers.	4	6	0

Comment: Zalando collects human rights information of potential new suppliers by collecting self-assessments and existing audit reports. Zalando has a list of Zero Tolerance issues, which could lead to the decision not to source from a specific production location.

Zalando did not receive questionnaires from all production locations after it had joined Fair Wear. As the relationship with these production locations was stopped, it could not follow up.

The company does not collect information from workers or stakeholders to inform the sourcing decision.

Recommendation: Fair Wear encourages the member to collect worker and stakeholder input before placing the first order.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.6 Member actively ensures awareness of the Fair Wear CoLP, the grievance mechanism, and social dialogue mechanisms within the first year of starting business.	Basic	This indicator focuses on the preliminary mitigation of risks by actively raising awareness about the Fair Wear Code of Labour Practices and complaints helpline. Discussing Fair Wear's CoLP with management and workers is a key step towards ensuring sustainable improvements in working conditions and developing social dialogue at the supplier level.	Evidence of social dialogue awareness raised through earlier training/onboarding programmes, onboarding materials, information sessions on the factory grievance system and complaints helpline, use of Fair Wear factory guide, awareness-raising videos, and the CoLP.	2	6	0

Comment: Zalando has its own grievance mechanism (SpeakUp), which is implemented throughout the company's operations. For clarity and efficiency reasons, it has been agreed that the member will continue with this system and inform Fair Wear about any reported grievances related to labour standards in its production locations within Fair Wear's scope.

Zalando shares a communication pack about its grievance mechanism with suppliers and production locations within the first year of doing business, and ensures that the relevant posters are posted correctly.

Zalando has not yet organised onboarding sessions for its new suppliers to raise awareness about the Fair Wear Code of Labour Practices or the importance of social dialogue.

Recommendation: Zalando is recommended to organise onboarding sessions specifically focusing on the CoLP and the grievance mechanism within the first year of doing business.

Indicators on Identifying continuous human rights risks

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.7 Member company has a system to continuously assess human rights risks in its production locations.	Intermediate	Members are expected to regularly evaluate risk in a systematic manner. The system used to identify human rights risks determines the accuracy of the risks identified and, as such, the possibilities for mitigation and remediation.	Use of risk policies, country studies, audit reports, other sources used, how often information is updated.	4	6	0

Comment: Zalando has a systematic approach to assessing human rights risks in its supply chain and has assessed the risks for each production location. It requires an updated social audit for each production location every 12 to 24 months, regardless of the risk assessment results. For its Bangladeshi production locations, it requires RSC (RMG Sustainability Council) monitoring. Additionally, it conducts regular monitoring visits. In 2023, visits were organised based on the economic importance of a production location. In 2024, monitoring visits were planned based on the results of the risk assessment, with a specific focus on risks related to child labour. During these visits, information is collected from workers when possible.

Recommendation: Zalando could complement its risk assessment process with more systematic worker, supplier, and stakeholder input.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.8 Member company's human rights due diligence process includes an assessment of freedom of association (FoA).	Intermediate	Freedom of association and collective bargaining are 'enabling rights.' When these rights are respected, they pave the way for garment workers and their employers to address and implement the other standards in Fair Wear's Code of Labour Practices - often without brand intervention.	Use of supplier questionnaire to inform decision-making, collected country information, and analyses.	4	6	0

Comment: Zalando has mapped the risks to Freedom of Association (FoA) in all its sourcing countries and can explain the main risks per country, including the risks to women workers. It has identified restricted freedom of association as a zero-tolerance issue. Zalando is exploring possibilities to continue working in countries where freedom of association is restricted, while supporting workers in organising themselves.

Recommendation: Zalando is recommended to use Tool 2: Supplier Questionnaire from Fair Wear's FoA Guide to assess and understand the risk regarding violation of FoA at its suppliers.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.9 Member company includes a gender analysis throughout its human rights risk identification, to foster a better understanding of gendered implications.	Intermediate	Investing in gender equality creates a ripple effect of positive societal outcomes. Members must apply gender analyses to their supply chain to better address inequalities, violence, and harassment.	Evidence of use of the gender mapping tools and knowledge of country-specific fact sheets.	4	6	0

Comment: The member could show it understands the basic gender risks for its sourcing countries, and for instance, identified the wage gap, forced overtime, sexual harassment, informal work and limited leadership for China and poverty wages, unsafe conditions, widespread gender based violence and harassment, job precarity and limited leadership for Bangladesh. Besides the risks, Zalando also has insights into the key contributing factors of these risks per country.

Additionally, Zalando actively collects gender-specific data from factories on general workforce composition, job categories, maternity and pregnancy status, through a questionnaire.

The member has yet to analyse the collected gender-disaggregated data at the factory and country levels and translate it into concrete activities.

Recommendation: Fair Wear recommends the member to start analysing the gender data collected at country and factory levels and connect them. Fair Wear's gender instruments can be helpful.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.10 Member company considers a production location's human rights performance in its purchasing decisions.	Advanced	Systematic evaluation is part of continuous human rights monitoring. A systematic approach to evaluating production location performance is necessary to integrate social compliance into normal business processes and to support good decision-making.	Supplier evaluation format, meeting notes on supplier evaluation shared with the factory, processes outlining purchasing decisions, link to responsible exit strategy.	4	4	0

Comment: Suppliers' human rights performance is evaluated systematically every year through a supplier scorecard. The scorecard consists of three areas, including responsible supply chain, product performance and product compliance. Suppliers' human rights performance contributes to 25% of the responsible supply chain area and is determined by the number of open findings from social audits. The scorecard provides direction on order placement for the season per supplier, indicating "Growth", "Stable", "Decrease" or "Phase out".

Recommendation: Fair Wear recommends Zalando to share and discuss the outcome of the supplier evaluation with all its suppliers and their worker representatives.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.11 Member company prevents and responds to unauthorised or unknown production and/or subcontracting.	Insufficient	Subcontracting can decrease transparency in the supply chain and has been demonstrated to increase the risk of human rights violations. Therefore, when operating in higher-risk contexts where it is likely subcontracting occurs, the member company should increase due diligence measures to mitigate these risks.	Production location data provided to Fair Wear, financial records from the previous financial year, evidence of member systems and efforts to identify all production locations (e.g., interviews with factory managers, factory audit data, web shop and catalogue products, etc.), licensee contracts and agreements with design collaborators.	0	4	0

Comment: Zalando uses the outcomes of its human rights monitoring to respond to unauthorised CMT subcontracting. However, Zalando does not yet know the printing or embroidery locations its suppliers use.

Requirement: Fair Wear membership covers everything after fabric, including support processes. Zalando is required to update its factory list with the relevant production locations for printing and embroidery.

Recommendation: Fair Wear recommends the member to periodically check with its intermediaries whether all known production locations are still up to date and use the information from questionnaires to update supplier data, including subcontractors.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.12 Member company extends its due diligence approach to homeworkers.	Intermediate	Homeworkers should be viewed as an intrinsic part of the workforce, entitled to receive equal treatment and have equal access to the same labour rights, and therefore should be formalised to achieve good employment terms and conditions.	Supplier policies, evidence of supplier and/or intermediaries' terms of employment, wage-slips from homeworkers.	2	4	0

Comment: Zalando has identified whether homework is prevalent in its sourcing countries. The homeworking policy is included in the supplier manual and is shared with all suppliers during the onboarding process. Zalando requires the production location to report when homeworkers are being used, and appropriate measures must be in place to ensure that the conditions for homeworkers are aligned with legal requirements.

During the last financial year, homeworkers were identified in Italy. Zalando is following up on this situation and, for 2025, has asked for specific attention to homeworkers in its social audits in Italy.

Recommendation: Zalando is recommended to ensure suppliers that work with homeworkers do so in a responsible way.

Indicators on Responsible purchasing practices

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.13 Member company's written contracts with suppliers support the implementation of Fair Wear's Code of Labour Practices and human rights due diligence, emphasising fair payment terms.	Insufficient	Written, binding agreements between brands and suppliers, which support the Fair Wears CoLP and human rights due diligence, are crucial to ensuring fairness in implementing decent work across the supply chain.	Suppliers' codes of conduct, contracts, agreements, purchasing terms and conditions, or supplier manuals.	0	4	0

Comment: Zalando uses contracts with its suppliers in the form of a terms sheet, which has no end date, as well as general instructions that include the Code of Conduct, terms and conditions for delivery, liability, and other relevant details. All purchasing conditions are agreed with suppliers upon establishing the business relationships. The terms and conditions are included in every purchase order the supplier receives. Payment terms are up to 45 days upon delivery. Due to its short payment term, Zalando applies a 1% discount to the FOB price, which is reduced to 0.5% for suppliers who meet environmental sustainability targets. This practice does not support human rights due diligence because it places an unequal financial burden on suppliers.

The agreements include penalties for delayed goods. During the past financial year, more than 40% of potential claims were waived.

Requirement: Zalando should evaluate its contracts to ensure that it does not place an unequal burden on its suppliers or include terms that limit the possibility of implementing the Code of Conduct.

Recommendation: Fair Wear strongly recommends Zalando to include the shared responsibility of CoLP implementation in its contracts, including fair payment terms.

Zalando is advised to review its contracts with suppliers against the principles mentioned in the Common Framework of Responsible Purchasing Practices (CFRPP).

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.14 Member company has formally integrated responsible business practices and possible impacts on human rights violations in its decision-making processes.	Advanced	Corporate Social Responsibility (CSR), purchasing, and other staff that interact with suppliers must be able to share information to establish a coherent and effective strategy for improvements. This indicator examines how this policy and Fair Wear membership requirements are embedded within the member company.	Internal information systems, status Corrective Action Plans, sourcing score- cards, KPIs listed for different departments that support CSR efforts, reports from meetings from purchasing and/or CSR staff, and a systematic manner of storing information.	6	6	0

Comment: There is an active interchange of information between CSR and other departments to enable coherent and responsible business practices. The member includes responsible business practices in job role competencies. For instance, responsible purchasing practices and upholding fair labour conditions are expected in the role of sourcing and purchasing staff.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.15 Member company's purchasing practices support reasonable working hours.	Intermediate	Members' purchasing practices can significantly impact the levels of excessive overtime at factories.	Proof that planning systems have been shared with production locations, examples of production capacity knowledge that is integrated into planning, timely approval of samples, and proof that management oversight is in place to prevent late production changes.	4	6	0

Comment: Zalando shares its budget forecast with strategic suppliers ahead of the season for a better production plan and capacity reservation. Material forecasts are shared before the season starts with suppliers to ensure they can properly prepare in terms of bookings, production planning and workforce management. Additionally, the member collects factory production capacity and utilises it for production planning.

Zalando maintains regular contact with suppliers to discuss production plans and understand any challenges. If the requested capacity exceeds what is available, Zalando collaborates with the supplier to find a feasible solution, such as onboarding another factory. In the event of a possible delay, the member may consider postponing the delivery date or adjusting the mode of transport.

Recommendation: The member is encouraged to evaluate with the supplier the production process after each season and, where needed, adapt its future planning.

Fair Wear recommends Zalando to take responsibility for the unused capacity that the supplier reserved based on forecasting.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.16 Member company can demonstrate the link between its buying prices and wage levels at production locations.	Insufficient	Understanding the labour component of buying prices is an essential first step for member companies towards ensuring the payment of minimum wages - and towards the implementation of living wages.	Interviews with production staff, documents related to member's pricing policy and system, buying contracts, cost sheets including labour minutes.	0	6	0

Comment: Zalando cannot link the wage levels at its suppliers to its own purchasing prices.

Requirement: Zalando needs to demonstrate an understanding of the link between buying prices and wage levels to ensure its pricing allows for the payment of the legal minimum wage.

Recommendation: Zalando is recommended to investigate wage levels in production countries and at its suppliers. This forms the basis for ensuring enough is paid to cover at least minimum wage and for making steps towards living wages.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.17 All sourcing intermediaries play an active role in upholding HRDD and Fair Wear's Code of Labour Practices and ensure transparency about where production takes place.	Advanced	Intermediaries have the potential to either support or disrupt CoLP implementation. It is members' responsibility to ensure production relation intermediaries actively support the implementation of the CoLP.	Correspondence with intermediaries, trainings for intermediaries, communication on Fair Wear audit findings, etc.	4	4	0

Comment: Zalando works with suppliers, who manage the relationship with the production locations. In most cases, Zalando is also in direct contact with the production locations.

Zalando has informed its sourcing intermediaries of the Fair Wear requirements and can demonstrate that they have communicated these requirements to the production locations accordingly. Additionally, the member has provided training to all suppliers and intermediaries on its Code of Conduct and the prevalent human rights violations in the industry.

Recommendation: The member is recommended to check if the intermediary's purchasing practices are fair and if the intermediary has adequate systems to ensure payments are made on time.

Layer 3 Prevention, mitigation and remediation

Possible Points: 96

Earned Points: 38

Indicators on the quality and coherence of a members' prevention and remediation system

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.1 Member company integrates outcomes of human rights risk identification (layer 2) into risk prioritisation and creates subsequent action plans.	Basic	Based on the risk assessment outcomes, a factory risk profile can be determined with accompanying intervention strategies, including improvement and prevention programmes.	Overview of supplier base with accompanying risk profile and follow-up programmes.	2	6	0

Comment: Zalando has prioritised risks and created action plans per supplier. For a few suppliers, this action plan is specific, based on detailed risk assessments. For most suppliers, the action plans are more generic.

For one of its main suppliers, Zalando completely relies on another brand to take responsibility for assessing the risk and managing the risk action plan. This has historically grown, but poses a risk. Because of the missing action plan of one of its main suppliers and the basic character of the majority of action plans, the score for this indicator is basic.

Recommendation: Fair Wear recommends the member to further improve its action plans.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.2 Member company's action plans include a gender lens.	Insufficient	The prevention and improvement programmes should ensure equitable outcomes. Thus, a gender lens should be incorporated in all programmes regardless of whether or not the programme is specifically about gender.	Proof of incorporation of the gender lens in follow up programmes, including stakeholder input.	0	6	0

Comment: As mentioned under 2.9, Zalando has started collecting information on the gender composition of each factory. Based on this information, the member aims to incorporate a gender lens in its action plans in the future.

Recommendation: Zalando is recommended to include a gender lens in all action plans.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.3 Member company's action plans include steps to encourage freedom of association and effective social dialogue.	Insufficient	Freedom of Association and Collective Bargaining are enabling rights. Therefore, ensuring they are prioritised in improvement and prevention programmes can help support improvements in all other areas.	Available prevention and improvement programmes, including stakeholder input.	0	6	0

Comment: Zalando has not yet included steps to encourage Freedom of Association (FoA) and effective social dialogue (SD) into its action plans.

Recommendation: Fair Wear recommends Zalando to include steps encouraging FoA and effective SD in all action plans.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.4 Member company actively supports a factory-level grievance mechanism.	Basic	Fair Wear's complaints helpline is a safety net in case local grievance mechanisms do not provide access to remedy. Members are expected to actively support and monitor the effectiveness of operational-level grievance mechanisms as part of regular contact with their suppliers.	Communication with suppliers, responses to grievances, minutes of internal worker committees, evidence of democratically elected worker representation, evidence of handled grievance, review of factory policies, and proof of effective social dialogue.	2	6	0

Comment: Zalando monitors the presence of internal grievance mechanisms through its social audits. In addition, the member began collecting information from factories about their internal grievance mechanisms in 2024, with the aim of evaluating their effectiveness in the future.

Recommendation: Fair Wear recommends Zalando to support and monitor the internal grievance mechanisms at suppliers and to respond when factory-level grievance mechanisms are not functioning.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.5 Member company collaborates with other Fair Wear members or customers of the production location.	Intermediate	Cooperation between Fair Wear members increases leverage and the chances of successful outcomes. Cooperation also reduces the chances of a factory needing to conduct multiple improvement programmes about the same issue with multiple customers.	Communication between different companies.	4	6	0

Comment: Zalando cooperates with other Fair Wear members at its shared suppliers, specifically in following up on grievances. In addition, the member collaborates with other customers to follow up on audits.

Zalando is actively involved in various industry initiatives aimed at implementing preventive measures, such as the International Accord and ACT. Zalando has not yet taken joint preventive measures in specific production locations.

Recommendation: We recommend Zalando to also work together on preventing human rights violations at specific production locations.

Indicators on implementation: improvement and prevention

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.6 Degree of verified actions.	80%	Fair Wear expects members to show progress towards the implementation of improvement programmes. Members are expected to be actively involved in the examination and remediation of any factory-specific problem.	Progress reports on improvement programmes.	6	6	-2

Comment: Zalando has not yet used Fair Wear full assessments and has not uploaded all findings into the Member Hub, which limits access to data. During the performance check, Zalando demonstrated that it had followed up on 80% of all outstanding actions for the corrective action plans of three randomly sampled production locations. These actions are linked to CAPs of full assessments conducted in the previous financial year. Most findings were related to health and safety.

Recommendation: Fair Wear recommends Zalando to critically evaluate the evidence it receives from the production location before marking actions completed.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.7 Degree of progress towards implementation of prevention programme.	Basic progress	Fair Wear expects members to show progress towards the implementation of prevention programmes. With this indicator, Fair Wear assesses the degree of progress based on the percentage of actions addressed within the set timeframe.	Update on prevention programmes.	2	6	-2

Comment: Zalando addresses the prevention of human rights violations at the sectoral level, based on its country risk scoping. For example, The Industry We Want (TIWW) for general Human Rights Due Diligence, the International Accord in Bangladesh linked to fire and building safety and ACT on the topic of wages. It has not translated this into specific factory actions.

Recommendation: Fair Wear recommends Zalando to translate its root cause analysis into concrete preventive actions as part of the risk profiles.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.8 Member company validates risk profile and maintains regular dialogue with factories where no action plan is needed.	Intermediate	When no improvement or prevention programme is needed, Fair Wear expect its member companies to actively monitor the risk profile and continue to mitigate risks and prevent human rights abuses.	Use of Fair Wear workers awareness digital tool to promote access to remedy. Evidence of data collected, worker interviews, monitoring documentation tracking status quo.	4	6	0

Comment: Zalando has some suppliers for whom action plans are not required, based on the country risk assessment. These cover 0,77% of the member's total FOB. Zalando still requires these production locations to conduct social audits. The member has yet to include worker representatives or local unions in discussions with factory management on possible human rights risks.

Recommendation: Zalando is recommended to ensure worker representation/local unions (when appropriate) are included in discussions with factory management on possible human rights risks.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.9 Degree to which member company mitigates root causes of excessive overtime.	Basic	Member companies should identify excessive overtime caused by the internal processes and take preventive measures. In addition, members should assess ways to reduce the risk of external delays.	This indicator rewards self-identification of efforts to prevent excessive overtime. Therefore, member companies may present a wide range of evidence of production delays and how the risk of excessive overtime was addressed, such as: reports, correspondence with factories, collaboration with other customers of the factory, use of Fair Wear tools, etc.	2	6	0

Comment: Zalando has not yet used Fair Wear full assessments and has not uploaded all findings into the Member Hub, which limits access to data. However, the member indicated that in the previous year, several audit reports mentioned excessive overtime, especially in China. Zalando understands the primary root causes, such as short lead times, poor production planning, or a lack of awareness. Zalando has taken this information to evaluate its own purchasing practices, specifically related to production planning, working on a more collaborative approach with the production locations.

Recommendation: Fair Wear advises Zalando to discuss with its supplier which solutions included in the Fair Working Hours Guide are applicable.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.10 Member company adequately responds if production locations fail to pay legal wage requirements and/or fail to provide wage data to verify that legal wage requirements are paid.	Intermediate	Fair Wear members are expected to actively verify that all workers receive legal minimum wage. If a supplier does not meet the legal wage requirements or is unable to show they do, Fair Wear member companies are expected to hold the management at the production location accountable for respecting local labour law.	Complaint reports, CAPs, additional emails, Fair Wear Audit Reports or additional monitoring visits by a Fair Wear auditor, or other documents that show the legal wage issue is reported/resolved.	2	4	-2

Comment: Zalando has not yet used Fair Wear full assessments and has not uploaded all findings into the Member Hub, which limits access to data. Zalando indicated that in the past financial year, none of the social audits indicated payments below the legal minimum wage. Several audits in China have indicated payment issues related to social security. Zalando is addressing this issue, but finds that it is often because of a distrust of workers in the social security office, and they prefer cash.

Recommendation: Members are recommended to investigate the wage levels at supplier factories to ensure that workers receive at least the legal minimum wage, i.e., no payment at trainee or probationary levels, in Bangladesh.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.11 Degree to which member company assesses and responds to root causes of wages lower than living wages in production locations.	Insufficient	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach.	Member companies may present a wide range of evidence of how payment below living wage was addressed, such as: internal policy and strategy documents, reports, wage data/wage ladders, gap analysis, correspondence with factories, etc.	0	6	0

Comment: Zalando has no insight into the wage levels at its suppliers and has not yet discussed the topic of living wages with them.

Requirement: Zalando should have an overview of wages paid in its production locations.

Recommendation: Fair Wear encourages Zalando to discuss with suppliers about different strategies to work towards higher wages and develop a systemic and time-bound approach. It is advised to start with suppliers where the member is responsible for a large percentage of production and has a long-term business relationship.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.12 Member company determines and finances wage increases.	Basic	Member companies should have strategies in place to contribute to and finance wage increases in their production locations.	Analysis of wage gap, strategy on paper, demonstrated roll out process.	2	6	0

Comment: Zalando has started to address the topic of living wage internally by focusing on improving wage management systems at production locations as a first step to contribute to higher wages at production locations. It has not yet included an approach to financing higher wages in the strategy.

Recommendation: It is advisable that the strategy for financing wage increases be agreed upon by top management.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.13 Percentage of production volume where the member company pays its share of the living wage estimate.	0%	Fair Wear requires its member companies to act to ensure a living wage is paid in their production locations to each worker.	Member company's own documentation such as reports, factory documentation, evidence of Collective Bargaining Agreement (CBA) payment, communication with factories, etc.	0	6	0

Comment: Zalando does not contribute to higher wages at any of its production locations.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.14 Member addresses grievances received through Fair Wear's helpline in accordance with the Fair Wear's Access to Remedy Policy.	Intermediate	Members are expected to actively support the operational-level grievance mechanisms as part of regular contact with their suppliers. The complaints procedure provides a framework for member brands, emphasising the responsibility towards workers within their supply chain.	Overview of supporting activities, overview of grievances received and addressed, etc.	2	4	-2

Comment: Zalando received two complaints in the past financial year. One was about failure to pay maternity benefits in Bangladesh, which was quickly resolved. Another one was about harassment at its suppliers in Türkiye. As a way to remediate and prevent the case, it was suggested that a training on violence and harassment prevention be conducted. However, the production location indicated it no longer wished to work with Zalando, which made it difficult to completely resolve the case. The member actively responded to these complaints as per Fair Wear's Complaints Procedure. Zalando did not yet include the outcome of these complaints to decide on further preventive actions in its supply chain.

Recommendation: The member is recommended to take steps to prevent similar complaints from occurring in its supply chain.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.15 Degree to which member company implements training to address the risks identified.	Intermediate	Training programmes can play an important role in improving working conditions, especially for more complex issues, such as freedom of association or gender-based violence, where factory-level transformation is needed.	Links between the risk profile and training programme, documentation from discussions with management and workers on training needs, etc.	4	6	0

Comment: Zalando has organised training at some of its suppliers based on its risk assessment. For example, some Vietnamese factories are participating in ILO Better Work due to risks of child labour, excessive overtime, occupational health and safety and freedom of association. In addition, the member has enrolled all its suppliers (intermediaries) in training on human rights in general and the prevention of child labour specifically.

Recommendation: The member is recommended to implement training for all factories where this is part of its action plan.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.16 Degree to which member company follows up after a training programme.	Basic	Training is a crucial tool to support transformative processes but complementary activities such as remediation and changes at the brand level are needed to achieve lasting impact	Evidence of engagement with factory management regarding training outcomes, documentation on follow-up activities, and proof of integration into further monitoring and risk profiling efforts.	2	6	0

Comment: Zalando followed up on the implemented training by reviewing the results of the ILO Better Work training and communicating with ILO Better Work to understand the factory performance.

Recommendation: We encourage Zalando to expand its follow-up after training.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.17 The member company's human rights due diligence system includes a responsible exit strategy.	Intermediate	Withdrawing from a non-compliant supplier should only be the last resort when no more impact can be gained from other strategies. Fair Wear members must follow the steps as laid out in the responsible exit strategy.	Exit strategy policy, examples of supplier communications.	2	4	0

Comment: Zalando's human rights due diligence system includes an exit strategy based on the evaluation of suppliers. In 2025, the member developed a responsible exit strategy aligned with the Common Framework for Responsible Purchasing Practices.

Recommendation: Zalando could include the responsible exit strategy as part of its suppliers' agreement or contract.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.18 Member company's measures, business practices and/or improvement programmes go beyond the indicators or scope.	Basic	Fair Wear would like to reward and encourage members who go beyond the Fair Wear policy or scope requirements. For example, innovative projects that result in advanced remediation strategies, pilot participation, and/or going beyond tier 2.	Overview of Human Right risk monitoring, remediation and prevention activities and processes.	2	6	0

Comment: Zalando has begun consolidating its Tier 2 production locations to enhance its influence in improving labour conditions in these locations.

Layer 4 External communication, outreach, learning, and evaluation

Possible Points: 18

Earned Points: 12

Indicators related to communication

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.1 Member company actively communicates about Fair Wear membership.	Intermediate	Fair Wear membership includes the need for a brand to show its efforts, progress, and results. Fair Wear members have the tools and targeted content to showcase accountability and inform customers, consumers, and retailers. The more brands communicate about their sustainability work, the greater the overall impact of the work of the Fair Wear member community.	Member website, sales brochures, and other communication materials.	2	4	0

Comment: Zalando does not communicate about Fair Wear membership on its website. It has included information about Fair Wear membership in its Annual Report.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.2 Member company sells external brands with a Human Rights Due Diligence system (if applicable).	No reselling of external brands	Some member companies resell other brands, which Fair Wear refers to as 'external production'. These members are expected to investigate the Human Rights Due Diligence system of these other brands, including production locations and the availability of monitoring information.	External production data in Fair Wear's information management system, collected information about other brands' human rights due diligence systems, and evidence of external brands being part of other multi-stakeholder initiatives that verify their responsible business conduct.	N/A	4	0

Comment: Zalando does not sell external brands as part of its private label.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.3 Human rights due diligence reporting is submitted to Fair Wear and is published on the member company's website.	Advanced	The social report is an important tool for member companies to share their efforts with stakeholders transparently. The social report explicitly refers to the workplan and the yearly progress related to the brands goals identified in the workplan.	Social report.	4	4	0

Comment: Zalando has submitted its sustainability report and published it on its website.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.4 Member company engages in advanced reporting activities.	Insufficient	Good reporting by members helps ensure the transparency of Fair Wear's work and helps share best practices within the industry. This indicator reviews transparency efforts reported beyond (or included in) the social report.	Brand Performance Check, audit reports, information about innovative projects, specific factory compliance data, disclosed production locations (list tier 2 and beyond), disclosure of production locations, alignment with the Transparency Pledge.	0	4	0

Comment: Zalando does not report on factory-level data and remediation results.

Recommendation: Zalando is recommended to include more factory-level data in its reporting and ensure suppliers consent with data sharing.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.5 Member company has a system to track implementation and validate results.	Advanced	Progress must be checked against goals. Members are expected to have a system in place to track implementation and validate the progress made.	Documentation of top management involvement in systematic annual evaluation includes meeting minutes, verbal reporting, PowerPoint presentations, etc. Evidence of worker/supplier feedback.	6	6	0

Comment: Zalando has a system to track progress and check if implemented measures have been effective in preventing and remediating human rights violations. This internal evaluation system involves top management. In its evaluation system, the member includes information from an anonymous satisfaction survey that gathers feedback from suppliers and production locations, focusing on purchasing practices. A survey for workers is planned for 2026.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.6 Level of action/progress made on requirements from previous Brand Performance Check.	No requirements were included in the previous Brand Performance Check	In each Brand Performance Check report, Fair Wear may include requirements for changes to management practices. Progress on achieving these requirements is an important part of Fair Wear membership and its process approach.	Member should show documentation related to the specific requirements made in the previous Brand Performance Check.	N/A	4	-2

Comment: This is Zalando's first performance check, so this indicator is not applicable.

5 Appreciation chapter

5.1 Member company publicly responded to problems/allegations raised by consumers, the media, or NGOs.: Not applicable

5.2 Member company actively participated in lobby and advocacy efforts to facilitate an enabling environment in production clusters.: Not applicable

5.3 Member company actively contributed to industry outreach, visibility, and learning in its main selling markets.: Not applicable

Recommendations to Fair Wear

Zalando would like to collaborate more closely with other brands to exchange best practices and insights.

Zalando recommends Fair Wear to improve its visibility and the brand image. To make it explicit that Fair Wear membership is not just for small brands.

At the start of the membership, it was difficult to gain a clear understanding of what is expected of a Fair Wear member. Zalando had to do a lot of work itself and would recommend Fair Wear to improve its support to new members.

Brand Performance Check details

Date of Brand Performance Check: 30-09-2025

Conducted by: Anne van Lakerveld

Interviews with: Pascal Brun, VP Sustainability, Diversity & Inclusion

Hannah Ehrhard, Principal Decent Work

Frederic Teufel, Director Private Label Commercial

Matthias Hurler, Director Private Label Product Supply

Christopher Schumm, Head of Private Label Buying & Design

Cem Oztat, Head of Private Label Sourcing & Operations

Carl Chan, Senior Ethical Sourcing Manager Private Label

Johara Gargiulo, Ethical Sourcing Manager Private Label

Sarah Wegener, Head of Corporate Compliance

Francy Duarte, Senior Compliance Manager

Laura Diaz Baena, Compliance Manager

Ana Albuquerque, Senior Manager Sustainability Communications