

Transparency Reporting on Content Moderation

According to Art. 15, 24, 42 Digital Services Act

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Transparency Reporting on Content Moderation

Summary

In line with the requirements of the Digital Services Act (**DSA**), we have released our DSA Transparency Report, showcasing Zalando's content moderation efforts from April to June 2025.

Throughout this time frame, Zalando received 498 notices, which are reports made by users regarding content that relates to products sold by our partners. Out of the initial notices, 370 required content restriction on our platform. These represent a mere 0.027% of our total assortment. Of those, the vast majority were restricted because they contained product information not adhering to our product mapping guidelines.

We received 0 orders from authorities.

These numbers reflect Zalando's highly curated business model. We offer high-quality products from well-established brand partners and we also have strict protocols and policies in place that all brand partners have to comply with and adhere to, as well as community guidelines when it comes to reviewing or commenting on content or creation of content.

We therefore consider Zalando's risk of disseminating illegal or harmful content as very low compared to other VLOPs under the DSA.

About Zalando

Founded in Berlin in 2008, Zalando is Europe's leading online multi-brand fashion destination. We are building a pan-European ecosystem for fashion and lifestyle e-commerce, along two growth vectors: Business-to-Consumer (B2C) and Business-to-Business (B2B). In B2C, we provide an inspiring, high-quality multi-brand shopping experience for fashion and lifestyle products across 25 markets: Austria, Belgium, Croatia, the Czech Republic, Denmark, Estonia, Finland, France, Germany, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, the Netherlands, Norway, Poland, Romania, Slovakia, Slovenia, Spain, Sweden, Switzerland and the United Kingdom. In B2B, we leverage our logistics infrastructure, software, and service capabilities to support brands and retailers in managing and scaling their entire e-commerce business, both on and off the Zalando platform. Through our ecosystem vision, Zalando aims to enable positive change in the fashion and lifestyle industry.

<https://corporate.zalando.com>

The assortment (clothing, footwear, accessories, and beauty) of international brands ranges from world famous names to local labels. We work with and curate genuine suppliers and partners.

We operate a hybrid business model, which consists of:

- A **retail business**, where we sell our products to our customers. This represents 65.7% of our business (Gross Merchandise Value, GMV)¹. For the retail business there is no storage and dissemination of any third party content as it is Zalando's own content and products. Therefore, it does not fall within the scope of the DSA.
- A **partner business**, where partners sell their products to customers via Zalando. This represents 34.3% of our business (GMV)². For the partner business we make available information of products (in particular product pictures and description), that are sold by our partners.

Zalando only works with legitimate partners. Only fashion and beauty partners in the form of registered companies or professionals are enabled to offer products to our customers.

Each partner is subject to a due diligence process and goes through an extensive onboarding process containing KYC (Know Your [Business] Customer) checks. They have to conclude a comprehensive partner contract and associated policies, annexes and guidelines, such as our "platform rules", our quality assurance manual and our content guidelines. These specify the marketability standards and legal requirements for the products offered by partners and determine mandatory requirements for each product category. **All content provided by Zalando's partners is checked, moderated and finally uploaded by Zalando** to ensure its correctness and appropriateness.

Conformity with the contractually agreed requirements—particularly those related to safety, intellectual property, and sustainability—is addressed by several teams, each focusing on specific aspects within their respective areas of responsibility. .

As part of our quality control processes, established long before the DSA, **if we receive any information about inappropriate, potentially unsafe or illegal content**, we investigate the case, which may include requesting further information related to product safety from the partner or sending the partner product for testing in laboratories. Depending on the nature of the content, we initiate a product recall.

¹ As per our FY 2024 annual report. In 2024 we adjusted our segment reporting from a sales channel view (Fashion Store, Offprice) to a segment reporting view that distinguish between serving our B2C customers on the Zalando platform & B2B customers on and off the Zalando platform.

² Idem.

Our reporting mechanism

In addition to the previously described, and in accordance with the DSA, we have implemented a robust reporting mechanism. This mechanism allows users and stakeholders to report content that they believe may violate European law, the laws of individual member states, or the standards that we have set for ourselves and our partner business. This is strategically placed in the vicinity of relevant content on our product pages. We believe in making it as easy as possible for our users to bring to our attention any concerns they may have about the content they encounter on our platform.

Types of Reportable Violations

We have undertaken a thorough review of the content on our website to identify potential violations of statutory law and our own internal standards. Consequently, we have decided to allow for the reporting of various types of potential violations. These include, but are not limited to:

- **IP Infringements:** Any content that infringes upon intellectual property rights, such as copyright or trademark violations, can be reported through our mechanism.
- **Wrong or Incomplete Product Information:** Reporting inaccuracies or omissions in product descriptions and information is essential for maintaining transparency and trust.
- **Product Safety Concerns:** We encourage users to report any content that raises concerns about the safety of products offered on our platform.
- **Environmental Concerns:** Reporting content that may be in violation of environmental standards or policies aligns with our commitment to sustainability and responsible business practices.
- **Inappropriate Content:** This category includes content that may be offensive, discriminatory, promote violence, or extremism.

Once we receive a notification it will be assigned to and reviewed by members of our expert teams. If the content is found to violate local laws or our Zalando standards, then the content is removed from our websites.

To allow for comparability across all VLOPs, we decided to rely on the European Commission's categorization for our Transparency Reporting. For this reason, most reports from Zalando users are labelled as 'Other' - these include, among others, mandatory product information missing or product not meeting eco-design standards.

To help you understand the report, we have compiled the most relevant terminology:

- **Orders** are any requests for information or to act against illegal content issued by an authority of a Member State of the European Union. This section of the report informs about the number of orders we have received and how we have managed them.
- **Notices** are any reports submitted by customer, Trusted Flaggers or any other stakeholder with the intent to notify us about potentially illegal content that third parties have disseminated on our platform. This section provides an overview of the number of notices we have received and how we have managed them.
- **Trusted Flaggers** are individuals or organisations that have been awarded the status of a Trusted Flagger by the Digital Service Coordinator at the place of their establishment. They have proven their expertise for detecting illegal content and are known for their diligence and objectivity. As of the publication of this report, 40 organisations have been awarded this status.
- **The Internal Complaints Handling** is a means to request the review of a decision that we have previously made following a notice. This section provides an overview of how often our initial decisions were challenged and the extent to which we have upheld or reversed the decisions.
- **Out-of-court settlement** is another means to have our decisions independently reviewed and disputes settled by out of court settlement bodies.
- **Suspensions** can be imposed either on content providers for repeatedly providing manifestly illegal content or on anyone submitting manifestly unfounded notices or complaints. Suspension may involve the temporary inability to upload new content or sell on our website, or the suspension of processing notices or complaints.
- **Content Moderators** refers to our experts who review notices, complaints and orders and take decisions based on the statutory requirements and our own standards.

Conclusions

1. During the last reporting period, Zalando received 498 notices from users, 0 of orders from authorities and restricted 370 pieces of content. These represent a mere 0.027% of our total assortment.
2. Out of the initial notices, 370 required content restriction on our platform. Of those, the vast majority were restricted because they contained product information not adhering to our product mapping guidelines. These numbers **highly contrast with the numbers provided by other designated VLOPs**, which in most cases reported millions of notices by users or authorities and content removals. This is because:
 - a. We run a **highly-curated hybrid business**, consisting of a retail business and a partner business. Only the partner business falls within the scope of the DSA.
 - b. **We only work with legitimate partners**, who are subject to a strict due diligence process and go through an extensive

onboarding process. A dedicated team monitors that the contractually agreed requirements are met.

3. As a result and as attested in our claim against our designation as VLOP, **we have very low risk of disseminating illegal or harmful content**, as presumed to VLOPs by the DSA.

Appendix: Transparency Report April- June 2025

Report Identification

Information on Orders

Information on Notices

Number of Notices received	Total Number	498														
	Submitted by Trusted Flaggers	0														
Breakdown by type of illegal content	Animal Welfare	Data protection & Privacy	Illegal or Harmful Speech	Intellectual Property Infringements	Negative Effects on Civic Discourse or Elections	Non-consensual Behaviour	Pornography or sexualized Content	Protection of Minors	Risk for Public Security	Scams and/or Fraud	Self-harm	Scope of Platform Service	Unsafe and/or illegal Products	Violence	Other	
			31	19			2	4	6		4		412	16	4	
Action taken pursuant to the notice	Visibility Restriction															
								Monetary Restriction			Provision of the service		Account Restriction			
	Removed	Disabled	Demoted	Age restricted	interaction restricted	labelled	other	suspended	terminated	other	suspended	terminated	suspended	terminated		
Number of action taken based on law		235	135	0	0	0	0	0	0	0	0	0	0	0	0	
Number of action taken based on T&C		370														
Number of notices processed by automated means		0														
Median time to take action		8 days														

Information on Own-Initiative Content Moderation

Description	<p>The Digital Services Act defines "content moderation" as any activities that are aimed, in particular, at detecting, identifying and addressing illegal content or information incompatible with terms and conditions, provided by third parties (e.g., the sellers on our online shop). It is therefore to be understood as a reactive measure post publication of any content.</p> <p>At Zalando, we prioritize the delivery of safe, responsible, and compliant content to our users from the outset. We have clear and comprehensive rules and guidelines (concerning, e.g. product safety and intellectual property) that any third party who wishes to sell products on Zalando has to agree and adhere to. Our content review and approval practices are designed to maintain a high standard of quality and integrity in all the products and information we distribute. We take this responsibility seriously and have developed a robust content review and approval framework that primarily revolves around proactive and comprehensive review prior to publication based on aforementioned rules and guidelines.</p> <p>Content is only uploaded by us directly after the comprehensive manual and automatic review process has been conducted and compliance with these rules and guidelines has been approved. By this, we ensure that our content adheres to legal, ethical, and community guidelines. In the light of this proactive approach Zalando's (post-publication) content moderation predominantly concerns reviews upon notice (e.g., by customers or partners). In addition, some products offered by third party sellers are ordered by respective experts teams (such as Product Quality and Safety Team) in order to check physical compliance of the product with applicable law (such as labelling). In case of identified irregularities products are being deactivated.</p>
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Action taken pursuant own-initiative moderation	Visibility Restriction							Monetary Restriction			Provision of the service		Account Restriction	
	Removed	Disabled	Demoted	Age restricted	interaction restricted	labelled	other	suspended	terminated	other	suspended	terminated	suspended	terminated
	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Number of action taken based on law	N/A													
Number of action taken based on T&C	N/A													
Numer of items moderated by automated means	N/A													
Numer of items moderated by content moderators	N/A													

Internal Complaints Handling / Out-of-court settlement

Number of complaints submitted through internal complaints handling system	1		
Basis for complaints	Procedural Complaints	Substantive Complaint in illegality/ Incompatibility	Restriction not diligent/ objective/ proportionate
	0	1	0
Decisions taken pursuant to complaint	Decision upheld	Decision reversed	
	1	0	
Median time to take decision	20		
Number of complaints submitted to out-of-court dispute settlement bodies	0		

Suspensions Imposed on repeated offenders

Number of suspension enacted for the provision of manifestly illegal content	N/A
Number of suspension enacted for the provision of manifestly unfounded notices	N/A
Number of suspension enacted for the provision of manifestly unfounded complaints	N/A

Use of Automated Means for Content Moderation

Summary of the use made of automated means for the purpose of content moderation	Zalando does not rely on automated means for (post-publication) content moderation.
qualitative description of the automated means	N/A
specification of the precise purposes tp apply automated means	N/A
safeguards applied to the use of automated means	N/A

Number of moderators employed	<div> <div>Total Number of Part-time Moderators</div> <div>33</div> </div> <div> <div>Full Time Equivalent</div> <div>1.7</div> </div>											
Breakdown by Member State	AT	BE	CZ	DE	DK	EE	ES	FI	FR	HR	HU	
		1	2	1	4	1	0	2	1	3	1	0
	IE	IT	LT	LU	LV	NL	PL	RO	SE	SI	SK	
		0	4	1	0	0	3	3	1	1	0	1
Qualifications of Content Moderators	Master of Science in International market and Sustainability Fashion Industry, Office management certification, LLM - Master in Intellectual Property Law, MSc - Master in International Business Management, MSc in Political Science, Bachelor's Degree Chemical Engineering, Master Environmental Toxicology, Bachelors of Science in Biology and Industrial Microbiology, Bachelor of Science in Clothing & Textile Technology, MS in Business Economics, Paralegal, MA in Art History, MA in Fashion Studies, BS in Advertising, Diploma Textile & Surface Designer, MA in German Studies, Engineering, Master Retail and Consumer management, Master Data Management, Master Translation, Bachelor degree in English language and literature, Bachelor degree in Italian Language and Literature, Bachelor degree in English language and literature, Bachelor of Law, attorney-at-law (Rechtsanwalt)											
Linguistic Expertise of Content Moderators	English, German, Bulgarian, Italian, Lithuanian, Dutch, Spanish, French, Portuguese, Croatian, Hungarian, Polish, Swedish, Turkish, Korean, Japanese, Danish, Arabic, Greek, Albanian											
Training given to Content Moderators	Digital Services Act Process Training, alignment with WHS about reassignment, DSA sheet training, Intellectual Property protection training, Quality Management Training, Onboarding Trainings for every type of articles											
Support given to Content Moderators	Onboarding and updates digital guidelines for every type of articles, Legal team support for decision making, Inhouse inspection, chemical and physical product testing at accredited external laboratory, Product, Content and Brand (PCB) Guidelines											