



# Modern Slavery Statement 2025

This is our ninth Zalando Modern Slavery Statement and relates to our progress throughout 2024. Our former versions can be found on our [website](#).



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# Modern Slavery Statement 2025



## Our commitment

Human trafficking and forced labour (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, including ILO Conventions and the Universal Declaration of Human Rights (UDHR). Our commitment is aligned with the broader objectives detailed in our Annual Report and are consistent with the commitments made in our Policy Statement on Zalando's Human Rights Strategy. Referred reports can be found [here](#).

Building on these efforts, we want to ensure that our business operates more responsibly and does not take advantage of workers and communities along our value chain. This goal requires us to maintain constant awareness of ethical risks — including those relating to equal treatment, working conditions, and modern slavery — and to take action when we see potential wrongdoing. Please find more details in our [Annual Report](#).

## Our business

Our vision is to build the leading pan-European fashion and lifestyle e-commerce ecosystem and to leverage our best-in-class e-commerce platform capabilities that we have developed over the past 17 years to enable our updated vision. What started as a Berlin-based online shoe store in 2008 has grown into a leading European fashion and lifestyle e-commerce platform in just a few years. We connect customers and brand partners, offering a one-stop shopping experience with a curated selection of the latest fashion trends. We want to inspire through a high degree of personalization, creating the right choice for every customer.



We serve more than 53 million active customers in 27 markets across Europe with our fashion and lifestyle offering that includes clothing, footwear, accessories, and beauty. We offer our customers multiple propositions to meet their shopping needs, ranging from Fashion to Beauty, Pre-owned, Designer, Lounge by Zalando or our loyalty program Zalando Plus. In B2B, we offer a unique e-commerce operating system with ZEOS, Tradebyte and SCAYLE, leveraging our logistics infrastructure, software, and service capabilities to support brands and retailers in managing and scaling their entire e-commerce business across Europe.

We are significantly investing in three areas that are essential for the success of our business and boost future growth: customers, partners and infrastructure. Please find more details in our [Annual Report](#).

## Progress against our 2024 commitments

We acknowledge that the industries in which we are active are at-risk for human rights violations. We therefore take steps to prevent, detect and respond to modern slavery. Thus, throughout 2024, we worked to strengthen our procedures in line with the next steps established in our [Modern Slavery Statement 2024](#).

| Steps planned for 2024                                                                                                                                                                                                                                                                             | Our progress                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| To embed due diligence in the company's structure in the most effective way, we will build on the risk analysis we have created and focus our preventive measures not only on risk-exposed business partners, but also on the legal areas that have been highlighted as exposed in our assessments | Based on the 2024 risk assessment, we identified risk distribution by legal area and internal business unit. This enabled us to train and empower colleagues in first-lines to become proactive partners in our compliance framework, aligning initiatives and preventive measures. Additionally, we partnered with the FairWear foundation to independently assess our Private Labels sector's human rights due diligence system, including equal treatment, working conditions, and modern slavery. |
| We will continue to increase the automation of our risk                                                                                                                                                                                                                                            | The groundwork for our automated risk assessment has been established and is expected to deliver a full human rights risk assessment of                                                                                                                                                                                                                                                                                                                                                               |



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assessment activities in order to create a solid and future oriented practice, freeing up even more capacity to focus on preventive measures.

our supplier base by the end of 2025. The system will capture both abstract and concrete risks while integrating our various risk-detecting and mitigating activities carried out throughout the year.

We have implemented a digital tool designed to streamline our assessment processes and establish a data-driven, consistent, and scalable foundation. Building this setup required addressing significant complexity, including aligning data sources, refining risk logic, and ensuring system compatibility. The tool's first release already supports the automated generation of key steps in the risk assessment, such as identifying risk indicators and linking them to appropriate mitigation actions.

While further development is ongoing, the current setup already enhances the speed and consistency of our risk determination, allowing us to dedicate more capacity to preventive and remedial measures.

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We will continue to explore industry-wide and supplier focused collaborations with partners in our private label value chains.

We kept collaborating with peers and industrial initiatives in modern slavery prevention and improving working conditions. In particular, we co-operated in our grievance handling and remediation (e.g. with FairWear Foundation, and The Accord) and supported the Employee Injury Scheme Pilot in Bangladesh.

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## **Governance & policies**

### **Governance**

The responsibility for implementation and operationalisation of Zalando's human rights due diligence program is delegated to the Corporate Compliance team with experts on third party compliance, human rights and equality. The Human Rights Officer (HRO) is part of our Central Sustainability Team and ensures an independent oversight of ongoing activities.



## Policies

Our expectations towards all our employees and business partners are set forth in our policies and standards which highlight, among others, the imperative respect for human rights in all our business activities.

- [Zalando's Code of Ethics](#) sets out Zalando's specific expectations towards every employee regarding social and ethical behaviour. The Code of Ethics has been communicated to our employees in various languages and is publicly available on our website.
- Our commitment to avoid human trafficking and forced labour in our supply chain is underpinned in our [Code of Conduct for Business Partners](#). It is issued by Zalando's Management Board and applies group-wide to our business partners.
- Complementary to our Code of Conduct, we have our [Sustainable Sourcing & Animal Welfare Policy](#). The policy aims to support the transition to a fair, sustainable and circular economy and defines minimum requirements for protecting human rights, the use of specific fibers, materials, ingredients and manufacturing methods for products sold through Zalando.
- In line with our internal Group Policy "Compliance Checks on Business Partners", Zalando carries out business partner due diligence, including sanction list screening and compliance database and adverse media checks for defined groups of business partners of the Zalando Group and in cases where potential compliance risks are apparent. The check helps us to learn about past incidents or allegations also in the area of modern slavery.
- We regularly publish a [Policy Statement on our Human Rights Strategy](#), setting out principles for human rights due diligence, embedded in our operating standards and management practices.

## Risk assessment & management

### The due diligence framework

We are committed to conducting risk-based human rights due diligence across our supply chain on an ongoing basis, in accordance with the recommendations set out in the OECD's Due Diligence Guidance for Responsible Business Conduct. Our due diligence approach is adjusted to take into account operational context and risk, business relationships and the extent to which we



may cause, contribute to or be directly linked to adverse human rights impacts. We seek to track the effectiveness of our responses and interventions. Further, we take both feedback, as well as qualitative and quantitative indicators from internal and external sources into account.

The human rights risk management at Zalando is defined in the Human Rights Due Diligence Program. In line with industry standards it is divided into 5 high-level steps:

1. **Govern:** Define and embed human rights standards and expectations in our operations and value chain, clearly communicate them to all stakeholders using the most appropriate channels and monitor program effectiveness;
2. **Analyse:** Identify and analyse supplier risk based on volume, location and industry-specific human rights risks;
3. **Prioritise:** Prioritise sector and supplier risk based on risk analysis and risk profile to define corresponding risk management measures;
4. **Manage:** Ensure that standards and expectations are met and implement preventive, remedial and mitigating measures;
5. **Report:** Publicly disclose efforts and progress in line with Zalando's own standards and legal requirements.

The individual elements are implemented through respective programs, frameworks and processes. Furthermore we are committed to providing employees, Business Partners and any other internal or external stakeholder with appropriate grievance mechanisms. We seek to build awareness and knowledge of our employees and Business Partners on human rights issues, encouraging them to speak up, without retribution and - if desired - anonymously, about any concerns they may have.

## Our next steps

Together with many teams across Zalando and in line with our target to continuously increase our ethical standards, we are committed to taking the following steps in 2025:

- Continuing to embed due diligence in the company's structure by strengthening our interaction with first line units, supporting them with automated services and central support. Therefore, we will continue to work on our automated human rights due diligence assessment by implementing learnings from the first year.
- Implement dedicated tooling support to better identify risks connected to our brand partners from the Fashion Industry. We will work on a



technically supported exchange with our brand partners to help them and us understand inherent risks and ways to minimize them.

- With our Private Labels becoming a member of the FairWear Foundation, we will hold ourselves accountable with a publicly available assessment of our Human Rights Due Diligence set-up, including our supply chain risk assessment, prioritization and action plans, grievance mechanisms, responsible purchasing practices, etc. The result would be utilized to drive improvement in our management system and keep track of the progress year by year.

This statement has been published in accordance with the United Kingdom's Modern Slavery Act 2015 (UK MSA) and summarises our steps taken against human rights violations including but not limited to modern slavery during the financial year ending 31 December 2024. It was prepared by the Corporate Compliance team and it is available on our corporate website in a readily accessible format. The statement has been approved to be effective from 01 December 2025 onwards by



**Robert Gentz**  
Management Board  
Zalando SE



**Sarah Wegener**  
Head of Corporate Compliance  
Zalando SE