



Group Policy

Forest Protection Policy for Packaging

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Terms and Definitions

- **Shipping packaging:** All Zalando paper-based packaging used for the shipment of goods such as paper bags, corrugated boxes, labels, void fill
- **Intralogistics packaging:** All Zalando paper-based packaging used for intralogistics processes in our warehouses
- **Primary packaging:** All Zalando paper-based packaging used as sales packaging conceived so as to constitute a sales unit consisting of products and packaging to the end user (PPWR Article 3 (5))
- **Ancient and endangered forests:** Intact forest landscape mosaics, naturally rare forest types, forest types that have been made rare due to human activity, and/or other forests that are ecologically critical for the protection of biological diversity (Canopy)
- **Endangered species habitats:** A specific physical or biological feature (PBF) of a habitat that is essential to the conservation of a listed species, providing the structural complexity, micro-climate, or connectivity required for nesting, breeding, feeding, or sheltering (Canopy)
- **Controversial sources:** Fibre sourced from companies that are logging forests illegally; tree plantations established after 2020 through the conversion or simplification of natural forests; or areas being logged in contravention of First Nations/tribal/indigenous peoples' and community rights (Canopy)
- **Virgin Fibre:** Fibres that are derived directly from natural or synthetic raw materials, without any previous processing or recycling
- **Natural forest:** A forest area with many of the principal characteristics and key elements of native ecosystems, such as complexity, structure and biological diversity, including soil characteristics, flora and fauna, in which all or most of the trees are native species (FSC-STD-01-001, FSC Glossary of Terms)
- **Plantation:** A forest area established by planting or sowing using either alien or native species, often with one or few species, regular spacing and even ages, and which lacks most of the principal characteristics and key elements of natural forests (FSC Glossary of Terms (FSC-STD-01-002))
- **Indigenous people:** People in independent countries who are regarded as indigenous on account of their descent from the populations which inhabited the country, or a geographical region to which the country belongs, at the time of conquest or colonisation or the establishment of present state boundaries and who, irrespective of their legal status, retain some or all of their own social, economic, cultural and political institutions (International Labour Organization (ILO) Convention (No. 169))
- **Proximity:** Consistent with the Accountability Framework initiative (AFi), proximity refers to any area where business operations are "in or around" community lands or where communities are "susceptible to being affected" by operations. This includes direct adjacency to tribal areas as well as any location where operations may impact customary resources (e.g., water sources, hunting grounds, or cultural sites) regardless of formal legal

boundaries

- **Cut-off date:** Referring to the final date after which conversion of natural forests to plantations is prohibited

1 Introduction: Our commitment to mitigate the risk of deforestation

Zalando is committed to managing forest-related risks within our packaging supply chain to:

- Ensure alignment with evolving international environmental standards and regulatory requirements
- Fulfil our sustainability commitments as a supporting partner of Canopy's Pack4Good Initiative including our Responsible Paper Packaging Commitment
- Continue to work with our partners, innovative companies and NGOs to expand the availability of post-consumer recycled content, while closely monitoring the development of next generation solutions with a focus on agricultural residues.

This Forest Protection Policy (the "**Policy**") is an update to the previous version from 2021 and supplements our Code of Conduct. The Policy details our packaging design and sourcing requirements and supplier due diligence process to ensure all paper-based packaging products containing wood fibres procured by Zalando as customer-facing, shipping and intralogistics packaging or primary (product) packaging for our Private Labels are free from fibres sourced from ancient and endangered forests, endangered species habitats or other controversial sources.

2 Scope: Who does this policy apply to?

Products covered under the scope of this Policy are all paper-based packaging products containing wood fibres procured by Zalando as customer-facing, shipping and intralogistics packaging or primary (product) packaging for our Private Labels. This Policy defines obligations of any contractual partner (hereinafter "**Business Partners**") of Zalando SE or an entity that is part of the Zalando group (in the following referenced to as "**Zalando**") who supplies us with paper-based packaging products covered under this aforementioned scope. This Policy obliges Business Partners to ensure the policy standards are upheld within their own systems.

3 Prohibited Activities

3.1 Prohibition on Ancient and Endangered Forest Sourcing

We strictly prohibit sourcing from ancient and endangered forests, regardless of their certification status. These forests include intact forest landscape mosaics, naturally rare forest types, forest types made rare by human activity, and/or other forests deemed ecologically critical for protecting biodiversity¹. To ensure dynamic risk management, Zalando maintains a

¹ As a starting point to geographically locate ancient and endangered forests, maps of High Conservation Value Forests (HCVF), as defined by the Forest Stewardship Council (FSC), and of intact forest landscapes (IFL), can be used and paired with maps of other key ecological values like the habitat range of key endangered species and forests containing high concentrations of terrestrial carbon and High Carbon Stock Forests (HCS). (The Wye River Coalition's Endangered Forests: High Conservation Value Forests

Priority Watchlist of high-risk regions, which includes but is not limited to: The Boreal Forest in Northern Sweden (Norrland), the Canadian and Russian Boreal Forests, Coastal Temperate Rainforests of British Columbia, Alaska and Chile, Tropical forests and peat lands of Indonesia, the Amazon and West Africa. This list is updated annually to reflect the latest scientific data and NGO benchmarks. Business Partners are required to monitor these updates and ensure their supply chains adapt to new high-risk designations as they arise. In case the referenced areas change, the policy will be updated and included in contractual re-negotiations with Business Partners. Business Partners can reject the updated list of high risk areas only due to reasonable arguments.

3.2 Protection of Rights and Ecosystems

Zalando is committed to respecting human rights, both in its activities and through its business relationships. Business Partners must implement rigorous due diligence to ensure long-term ecosystem protection; specifically, we prohibit sourcing from land converted from natural forests or ecosystems after 2020.

Furthermore, we strictly prohibit logging in contravention of indigenous peoples' and community rights, including the right to Free, Prior, and Informed Consent (FPIC). Zalando requires its Business Partners to obtain FPIC from local communities for any developments that may require land acquisition in proximity to tribal areas or in locations where land rights have been disputed.

4 Our Standards

4.1 Standards for Sourcing and Wood Fibre

Paper-based packaging procured by Zalando must meet our standards for structural properties, material quality, appearance, and delivery conditions. Furthermore, products must be economically sustainable and backed by a net-positive Life Cycle Assessment (LCA) relative to the baseline of our portfolio. We prioritise materials and methods according to the below sourcing hierarchy. Business Partners are hence expected to align their final design and composition according to the same hierarchy:

4.1.1 Reduce: Minimise material usage and weight, particularly minimising virgin fibre wherever it is technically possible.

4.1.2 Recycle: Maximise usage of recycled content (wherever applicable according to the standards previously stated), prioritising post-consumer waste.

4.1.3 Reuse: Design packaging for reuse.

4.1.4 Responsible certified virgin fibre sourcing: Packaging products made of virgin fibres must come from responsibly managed forests. We only accept packaging products certified by the Forest Stewardship Council (FSC), namely FSC 100% or FSC Mix.

4.2 Practices to Prevent Forest Degradation

4.2.1 Supply Chain Obligations: Business Partners must guarantee the exclusion of virgin fibres from ancient and endangered forests, endangered species habitats or other controversial sources within their supply chains. Business Partners must install preventative measures to ensure their suppliers adhere to the forest protection principles outlined in this policy.

4.2.2 Proof of Certification: All packaging products containing virgin paper fibres must be accompanied by valid proof of certification through the FSC system, along with their country of origin.

4.2.3 Accountability and Transparency: Business Partners must provide "Chain of Custody" (CoC) and licence code for all FSC certified products which contain virgin fibres.

4.2.4 Adherence to Regulations: Business Partners shall comply with the European Union Timber Regulation (995/2010, as amended) or, as soon as it becomes applicable, with the European Union Regulation on Deforestation-free products (2023/1115) ("EUDR"), as applicable to the Product in question (exception: Art. 37 (2) EUDR for products produced before). The Business Partner will be required to provide Zalando with precise geolocation information regarding the origin of fibers upon request, once the EU Deforestation Regulation (EUDR) is applicable.

4.2.5 Assessment and Monitoring: Within their legal obligations for a proper due diligence, we expect Business Partners to work towards transparency in the origins of raw materials and implement regular due diligence cycles to identify, manage and mitigate actual or potential adverse impacts on human rights and the environment. All Business Partners must proactively conduct regular risk assessments to evaluate their use of paper-based packaging and pinpoint risks associated with sourcing materials from ancient and endangered forests or endangered species habitats.

4.2.6 Reporting and Disclosures: Business Partners are expected to maintain and, if requested, share data regarding sourcing processes and raw materials to ensure

regulatory reporting obligations of Zalando and the business partners are complied with.

5 Information Rights

To review compliance with the requirements of this policy, the business partner agrees to provide Zalando with information about its operations upon request.

6 Risk Management and Remediation

Zalando regularly evaluates risks within its supply chain, e.g. via satellite monitoring, supply chain mapping, or stakeholder reports. When a high risk of noncompliance with this policy due to a certain (potential) incident is identified, the respective Business Partner is expected to conduct a prompt and transparent internal investigation into the matter.

Zalando views this proactive investigation as a collaborative exercise. We encourage open dialogue to verify the integrity of the supply chain and to implement preventive measures that ensure our shared sustainability standards included in this policy are upheld.

Should an actual violation with this Policy arise—specifically regarding illegal logging, the 2020 natural forest conversion cut-off date, or the right to Free, Prior, and Informed Consent (FPIC)—the Business Partner must prioritise immediate and effective remediation. A corrective action plan should reflect the three core criteria of stakeholder engagement, timely action, and proportionality of measures.

Zalando reserves the right to review the appropriateness of all actions. The Business Partner must adequately demonstrate that a proper investigation of the violation has taken place and that the problem has been redeemed. If a Business Partner fails to investigate potential violations within its own operations or within their supply chain, Zalando reserves the right to request information and, with sufficient notice, conduct audits of the Business Partner's operations in scope of the potential violation.

6.1 Corrective Action and Continuous Improvement

The integrity of our supply chain is paramount. Business Partners are expected to develop and execute a Corrective Action Plan (CAP) which may include:

- Immediate containment and forensic audit of the source and commission an independent third-party audit to verify the extent of the environmental or FPIC breach.
- Mandatory disclosure to certification bodies and regulatory authorities.
- Restoration of impacted areas or restitution to impacted communities.
- Enforced supplier reform through the issue of a time-bound Corrective Action Plan (CAP) to the supplier.
- Strategic transition to alternatives fulfilling our requirements.

6.2 Consequences of Violation

Zalando believes in continuous improvement rather than immediate disengagement. While we prioritise collaborative engagement to mitigate impacts, Zalando reserves the right to suspend or, as a last resort, terminate the relationship if a violation of this policy is identified. This refers specifically to failure of addressing severe risks or refusing to implement a corrective roadmap if a violation is identified. Also, failure to remediate consequences from illegal logging or the violation of indigenous rights in a timely manner can result in the suspension of business.

7 Shared Transparency and Reporting

Any employee, partner, or community member who identifies a high-risk situation or a potential breach of this policy is encouraged to contact **compliance@zalando.de** or utilize the **Zalando Whistleblowing Channels**, where anonymous reporting is possible. We are committed to protecting those who speak up and ensuring that all reports are handled with the highest degree of professional confidentiality.