



Information Booklet - Grievance Mechanism at Zalando



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The Zalando Grievance Mechanism

Introduction

We at Zalando¹ have a strong commitment to uphold applicable laws, ethical standards, and our internal regulations. Under the German Act on Corporate Due diligence Obligations in Supply Chains (commonly referred to as the Supply Chain Due Diligence Act or LKSG; German: "Lieferkettensorgfaltspflichtengesetz"), Zalando continuously executes, reviews, and updates robust human rights and environmental due diligence procedures. These structured measures are systematically designed to prevent, mitigate, or minimize the risk of human rights violations and environmental degradation across our own and supplier operations.

A core mandate of this legal framework is the maintenance of an effective, independent grievance mechanism. Zalando provides a fully functional, low-threshold grievance channel through which those in our supplier network can safely and anonymously report human rights or environmental violations. We expect our business partners to ensure that these reporting channels are actively made visible and accessible to their entire workforce.

This booklet outlines how business partners can fulfill these expectations. Additionally, it provides a detailed description of how our grievance channel operates, serving as a practical guide for partners to educate themselves and their employees on our processes.

How to Report a Concern

Technical Capabilities and Reporting

Our grievance channel is globally accessible across more than 150 countries via web browser and dedicated telephone hotlines. The tool supports multiple interfaces and can host 45 language options with integrated language and translation features.

The system guarantees two protections:

- Workers can talk directly and securely with our compliance team to share evidence and check the status of their case
- If a worker wants to keep their name a secret, the system fully protects their identity by allowing reporters to stay anonymous.



Web version at zalando-grievance.com



Phone numbers for available countries are available on the grievance homepage.

Who can use it

The reporting channel is open to any individual currently working for, under contract with, or directly affected by companies within Zalando's direct or indirect supply chain. It allows individuals to report human rights violations or environmental breaches resulting from the economic activities of Zalando or its suppliers.

¹ ZALANDO SE and all its subsidiaries, hereinafter commonly referred to as Zalando. The grievance mechanism provided by ABOUT YOU is accessible at <https://corporate.aboutyou.de/en/footer/compliance/whistleblowing>

While the tool can be used by all, we strongly encourage individuals to first utilize locally available on-site resources, such as trusted line managers, worker representatives, local ombudsperson, or facility-level human resources, to resolve localized concerns. However, if a reporter feels unsafe doing so, or wishes to remain anonymous, they are encouraged to use our reporting channel.

Zalando treats every report confidentially regardless and will not accept any discrimination or retaliation against individuals who raise their concerns in good faith.

When to report

We expect reporters to make a report as soon as they feel a violation has occurred. Ideally, reports should be made before a situation escalates or at a point where the violation can still be mitigated or prevented. Swift reporting will also allow Zalando to respond to the violation in a more effective manner.

What can be reported

We encourage anyone who has been a victim of or has witnessed any of the below violations. Reporters are encouraged to provide all facts about their case that are known to them at the time of writing.

- Human and labor rights violations
- Unequal treatment
- Non-compliance with employment contracts, compensation, or working hours
- Disregarding occupational health and safety
- Exploitation of child labor or failure to protect young workers
- Forced labor or exploitation of migrant workers
- Unlawful sourcing or handling of conflict minerals and metals
- Disregarding freedom of association and bargaining rights
- Human rights abuses connected with environmental damages
- Acts of corruption and anti-financial crime violations

How a report can be made

Phoneline

In regions where internet connectivity is poor, a country specific phone number will be available. Reporters can call the phone line at any time during the day. By calling the phone line, verbal reports will be securely recorded and transcribed into text to be sent to Zalando's reporting tool.

Browser

Reporters can access the reporting channel at zalando-grievance.com, either by entering the web address directly into their browser or by scanning the QR code on our informational materials. Once on the platform, a step-by-step guide leads them through the reporting process. The reporter will be provided with a unique case number with which they can create a password to access their secured inbox. This creates a secure login area for direct communication with the compliance team. Even if a reporter chooses to remain anonymous, the compliance team can use this channel to review further evidence, clarify open questions, and send report updates.

Reporting anonymously

To ensure your anonymity, you must do the following:

- If possible, do not report from a device provided by your employer.
- When using the web version, access the system directly by using the QR code provided or copying or typing the URL address in an internet browser rather than by clicking on a link.
- Do not submit your own personal details

Zalando treats every report confidentially and will not accept any discrimination of or retaliation against individuals who raise compliance concerns in good faith. Retaliation itself is a violation of our ethical standards and will be investigated accordingly.

What happens after a report is made

In order to be handled in accordance with the Zalando Investigation Guidelines, the intake of all reports is done by the Corporate Compliance Team, which has a group wide responsibility for Compliance at Zalando. All reporters will receive confirmation of receipt of their report within seven (7) working days. All valid complaints will be investigated and actions appropriate to resolving the violation will be initiated. The reporter will be provided with updates of the proceedings within three months after the report was received.

Confidentiality, anonymity and privacy

The person reporting a complaint can choose to do so anonymously. All information registered within our reporting channel and case management tool is processed by our Corporate Compliance team, operating under the principle of confidentiality. Data is shared exclusively on a strict 'need-to-know' basis when necessary for the investigation or required by law.

If a case needs to be shared with external parties, the reporter will be informed, and the same confidentiality principles will apply. External transfers may occur in the following scenarios:

- Transfer to an external party to assist the Corporate Compliance team in investigating facts (e.g., when specialized legal or local expertise is required).
- Transfer to a public investigation body or regulatory authority when the reported facts indicate a legal necessity to refer the matter to the competent authorities.
- Transfer to another company if the reported events fall under the responsibility of a different corporate entity rather than Zalando.

For privacy and data protection details, view the Privacy Policy at zalando-grievance.com.