



Modern Slavery Statement 2026

This is our 10th Zalando Modern Slavery Statement and relates to our progress throughout 2025. Our former versions can be found on our [website](#).



Table of contents

Our commitment	3
Our business	3
Progress against our 2025 commitments	4
Governance & policies	5
Governance	5
Policies	6
Risk assessment & management	6
The due diligence framework	6
Our next steps	7

Modern Slavery Statement 2026



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](#). Our subsidiary ABOUT YOU issued a dedicated Policy Statement on its Human Rights Strategy that can be found [here](#).

Building on these efforts, we want to ensure responsible business conduct and reduce adverse impacts for workers along our value chain. This goal requires us to maintain human rights — 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 story began 17 years ago with an obsession: serving customers and partners in the best possible way. From selling the first pair of flip-flops out of a Berlin apartment, Zalando has always played to win. On this journey, we've seen many changes, such as a shift to online, to mobile, to a platform model and a COVID-induced shift. Each time, we drove these changes with a growth mindset, grew stronger, and led our industry. This helped us transform from a small startup into one of Europe's digital champions, built by brilliant colleagues from more than 140 nations.

Today, as the European technology platform for fashion and lifestyle, we connect 62 million customers with more than 7,000 brands across 29 markets. Behind



that scale sits what truly sets us apart in the age of AI: a shared data and infrastructure platform built and refined over the past years.

In B2C, we offer three distinct apps where consumers discover, explore, and buy from the brands we love. We create experiences that feel personal and inspiring. This relevance with customers makes us essential for brands. They join us to offer their best assortments and stay to use our B2B services, powering their business both on and off Zalando across the complex European market. Please find more details of our achievements in B2B and B2C in our Annual Report.

Progress against our 2025 commitments

We acknowledge that the activities of our company present complex human rights considerations that require ongoing oversight. We therefore take steps to prevent, detect and respond to modern slavery and other human rights impacts. Thus, throughout 2025, we worked to strengthen our procedures in line with the next steps established in our [Modern Slavery Statement 2025](#).

Steps planned for 2025

Our progress

We will continue 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.

To strengthen our supply chain oversight, we implemented an automated risk assessment tool that evaluates human rights risks connected to our business partners and maps them to specific business units. The tool integrates our risk mitigation efforts to build a centralized risk database, providing clear visibility into where risks sit and how risk profiles evolve across assessment cycles

We will implement dedicated tooling support to better identify risks

We launched a due diligence questionnaire for brands, digitalized in the digital platform "One Retail Hub". The unified self-assessment questionnaire — co-developed by Cascale, Fair



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.

Wear, and leading European-based retailers — and free digital platform allow retailers to assess the maturity of supply chain HREDD systems, and brands to identify gaps in internal practices and receive recommendations for remediation.

With our Zalando 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.

Zalando Private Labels underwent the Fair Wear brand performance check and achieved the performance benchmarking category “good” already in the first year of being assessed.¹ With the performance check, we committed ourselves to constant improvement. Based on the 2025 results, we followed FairWear’s advice to advance our human rights due diligence risk assessment and mitigative measures, as well as our purchasing practices, to further reduce the risk in our supply chain.

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

¹ The full report is publicly available [here](#). By the time this report was published, the brand performance check of the following year 2026 was conducted already, the result was again a “good”.

Rights Officers² (HRO) are part of the group's different Central Sustainability teams. They ensure 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](#) and [ABOUT YOU's](#) Codes of Ethics set out our specific expectations towards every employee regarding social and ethical behaviour. The Codes have been communicated to our employees in various languages and are publicly available on our websites.
- Our commitment to avoid modern slavery and forced labour in our supply chain is underpinned in our [Codes of Conduct for Business Partners](#)³. They apply group-wide to our business partners.
- Complementary to our Codes of Conduct, we have our Sustainable Sourcing and Animal Welfare Policies.⁴ These policies aim to minimize adverse impacts, helping align our business practices and supply chain with broader sustainability and circularity principles. They define minimum requirements for protecting human rights, the use of specific fibers, materials, ingredients and manufacturing methods for products sold through Zalando and ABOUT YOU.
- 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 Zalando 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 policy statements on our Human Rights Strategy,⁵ setting out principles for human rights due diligence, embedded in our operating standards and management practices.

² Both Zalando and ABOUT YOU have a dedicated Human Rights Officer.

³ The ABOUT YOU Code of Conduct can be found [here](#).

⁴ Zalando's policy can be found [here](#), ABOUT YOU's [here](#).

⁵ The Human Rights Strategy Policy can be found under "Policies and Guidelines" in [this section](#) of our Corporate Website. The Human Rights and Environmental Policy of ABOUT YOU can be found [here](#).



Risk assessment & management

The due diligence framework

We are committed to conducting risk-based human rights due diligence across our supply chain regularly, informed by 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.

Our human rights risk management is in line with industry standards and 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.⁶ 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 adverse human rights impacts, encouraging stakeholders 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 the aim to reduce adverse impacts, we are committed to taking the following steps in 2026:

⁶ Our subsidiary ABOUT YOU manages their risks with a subset of comparable processes.

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- Further enhance our automated due diligence solution by including our social standard audit administration into the tool. We aim at automated support to trigger audits against business partners that fulfil a pre-defined risk portfolio. Also, results of audits and corrective actions will systemically flow into the next year's risk assessment.
 - Transition our human rights complaint channel for third parties into our existing whistleblowing tool, ensuring a groupwide single source of truth for potential ethical and legal violations in our supply chain. We aim at utilising the functionalities of our trusted partner for both, externals and internals. Particularly AI based language translations and easy to digest landing pages will improve the reporter experience.
 - We will run through a second year of the FairWear Foundation brand performance check. With that, 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 2025. 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 September 2026 onwards by



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