zalando **PARTNER**

Quality Assurance Manual

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Collaboration with our Brands and Partners (Partners includes Connected Retail partners: retailers) is essential to the way we grow as a business and ensures delivery of only safe and high-quality products to our fashion platform for customers' joy.

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Table of Changes

QAM version	Chapter	Topic	Change
10	2.2 Product Scope	Home accessories and decorative articles for WHS	Home accessories and decorative articles for WHS allowed also for non-EU partner
10	3.1 Due Diligence	New sub-chapter	Add: 3.1.2 Material Compliance
10	3.1 Due Diligence	New sub-chapter	Add: 3.1.5 Assessment of Economic Role
10	4.10 Cosmetic Care	Additional sales countries for Cosmetic Care planned for 2025	Additional sales countries for Cosmetic Care planned for 2025: Spain, Finland and Norway.
10	Annex	New sub-chapter	Add: Annex VII - Upcoming legislation
PRSL Upo	date		
Version	Chapter	Topic	Change
10	Annex I: Restricted Substances List	Heavy Metals	Add: Limit for Lead release added with 0.05 micrograms/cm2/hour.
			Test method specified
10	Annex I: Restricted Substances List	Extractable Heavy Metals	Add: Nickel compounds in individual concentration greater than 125 mg/kg w/w in textile and 25 mg/kg in leather, hides and furs
			Add: Ageing test method ISO 10195: 2018 Method A2 for Chromium VI content test
10	Annex I: Restricted Substance List	Polycyclic Aromatic Hydrocarbons (PAHs)	Add: test method EN 17132: 2019 for textiles
10	Annex I: Restricted Substance List	Cadmium	Add: Amended limit for other articles to 100 mg/kg
10	Annex I: Restricted Substance List	Alkylphenol Ethoxylates	Added Nonylphenol, Octylphenol and Octylphenol Ethoxylates with respective limits

1. Introduction

The continuous growth and success across our markets is based on trust, enabling customers to enjoy articles that are not just fashionable, but also of high quality.

We recognise our responsibility to protect consumer health, the environment and our supply chain, and we reinforce our commitment to excellence in product quality, safety and sustainability through trustful relationships with our business partners.

By engaging in a business relationship, you confirm your understanding and acceptance of - depending on your business relationship with Zalando - either our Zalando Platform Rules or our General Conditions of Purchase of Zalando SE, which mandate compliance with all requirements outlined in this manual.

The manual is part of the contract between Zalando and the Partner, regardless of whether or not the Partner has signed it separately. Zalando will provide the Quality Assurance Manual to the Partner upon request at any time.

Berlin, 01/12/2024

Johanna Maentynen

Director Corporate Product Compliance

1.1 About this Manual

The Quality Assurance Manual (hereafter QAM) is binding to all business partners (hereinafter Partners) engaging in a business relationship with any Zalando SE proposition (hereinafter Zalando), namely Lounge by Zalando (Lounge), Partner Program (PP), Connected Retail (CR), Zalando Fulfilment Service (ZFS), and Zalando Wholesale (WHS).

The QAM outlines Partners' product-related quality assurance obligations to comply with. The term 'products' herein encompasses physical consumer goods with associated consumer information and warnings, product packaging, and accompanying product documents and product data. Partners and their respective products that don't comply with the QAM are violating our contractual agreement.

It is imperative for Zalando to enter into a mutually beneficial business relationship with its Partners. However, a breach of contractual agreements may result in:

- Termination of the business partnership
- Contractual fines associated with non-compliances
- Product withdrawal and/or recall
- Stock return and order cancellation
- Notification to market authorities

1.2 How to read this Manual

Partners are required to adhere to the QAM and its specifications, effectively communicating them to relevant parties within and outside their organisation. While the legislative requirements outlined in this manual are not exhaustive, it's crucial to seek expert advice when necessary.

Partners are required to strictly adhere to the scope as per <u>Chapter 2</u>. <u>Scope of Operation</u> and ensure that products intended for sale comply with all national requirements of agreed sales countries and associated language requirements, unless otherwise agreed.

Regardless of the product category or any individual agreements, Partners must adhere to the generally applicable Partner responsibilities and ensure compliance with all general requirements detailed in Chapter 3. Partner Responsibilities.

Chapter <u>4. Product-specific requirements</u> expands the general requirements by additional obligations that only apply to product categories with more complex legal nature. However, Chapter 4 only supplements the general requirements in Chapter 3, which always applies to all products.

Partners should be aware that the referenced chapters, linked information, and details provided in the annexes are equally important. In this context we emphasise the importance of Zalando specific requirements in <u>Annex I: Product Restricted Substances List and Chemical Policy. Annex II: CE-Marked Products, Annex III: Guidelines to Classification of Product Failures, Annex IV: Testing of children's products, Annex V: Testing of Infant and</u>

<u>Toddler Products</u>, <u>Annex VI: Mandatory Onboarding Conditions for new Wholesale Partners</u>, and <u>Annex VII Upcoming legislative requirements</u>.

This approach keeps the main content concise and focused while making all necessary details easily accessible, thereby promoting better understanding and ensuring compliance.

2. Scope of Operation

Partners must adhere to Zalando's desired product scope and are required to ensure compliance with applicable legislation in all agreed Zalando sales countries.

2.1 Sales Countries and Languages

Products at Zalando must comply with country-specific legislation for agreed sales countries, and the product labelling must be in the official languages. As the scope of sales countries for Zalando Wholesale (WHS), Lounge (Lounge), Partner Program (PP), Connected Retail (CR), and Zalando Fulfilment Services (ZFS) differs, particular attention must be given to accepted sales countries and required languages, indicated by the '•' symbol, as shown in the table below. Sales countries left blank are prohibited. If deviating from the general sales scope, product-specific sales countries are outlined in chapter 4.

Area	Sales Country	Language	WHS	Lounge	PP/CR	ZFS
European Economic Area (EEA)	Austria	German	•	•	•	•
	Belgium	French, Dutch, German	•	•	•	•
	Czech Republic	Czech	•	•	•	•
	Croatia	Croatian	•		•	•
	Denmark	Danish	•	•	•	•
	Estonia	Estonian	•		•	•
	Finland	Finnish	•	•	•	•
	France	French	•	•	•	•
	Germany	German	•	•	•	•
	Hungary	Hungarian	•		•	•
	Ireland	English	•		•	•
	Italy	Italian	•	•	•	•
	Lithuania	Lithuanian	•	•	•	•
	Latvia	Latvian	•		•	•
	Luxembourg	French	•		•	•
	Netherlands	Dutch	•	•	•	•
	Norway	Norwegian	•		•	•
	Poland	Polish	•	•	•	•
	Portugal	Portuguese	•			
	Romania	Romanian	•	•	•	•
	Slovenia	Slovenian	•		•	•
	Slovakia	Slovak	•	•	•	•
	Spain	Spanish	•	•	•	•
	Sweden	Swedish	•	•	•	•
Non-EEA	Switzerland	French, Italian, German	•	•	•	•
	United Kingdom	English	•	•	•	•

2.2 Product Scope

Partners shall ensure that products are designed and manufactured for and made available to consumers only. Products that are designed and manufactured for professionals, which are likely, however, under reasonably foreseeable conditions, to be used by consumers, non-professionals are strictly prohibited.

Partners must assess the characteristics and intended use of the products to be sold and ensure that they are in line with the desired product scope, as described below, unless specifically agreed with the respective Zalando business proposition.

As the product scope of Zalando Wholesale (WHS), Lounge (Lounge), Partner Program (PP), Connected Retail (CR) and Zalando Fulfilment Services (ZFS) differs from each other, attention must be given to the 'permitted', 'restricted' and 'prohibited' product categories for each proposition in the table below.

Permitted product categories are indicated by the '•' symbol, while categories left blank are prohibited. Some product categories are restricted and only accepted if they have an EU responsible person (which must also be correctly labelled on the product), other than Zalando. Restricted product categories are indicated with the 'EEA' symbol. If a product falls into multiple categories and at least one category is prohibited, Zalando does not permit the sale of such products.

Product Category	Examples	WHS	Lounge	PP/CR	ZFS
Cosmetic care	Body care and styling products in liquid or gaseous form	EEA	EEA	EEA	EEA
	Wet wipes and sanitary towels	EEA	EEA	EEA	EEA
	Borderline products without pharmaceuticals			EEA	
Personal care	Hygiene products	EEA	EEA	EEA	EEA
	Grooming devices	EEA	EEA	EEA	EEA
	Personal care appliances	EEA	EEA	EEA	EEA
	High-intensity emitting care devices			EEA	
Home fragrances and accessories	Air fresheners and scented candles	EEA	EEA	EEA	EEA
	Shoe and leather care products (chemicals)	EEA	EEA		
	Home accessories and decorative articles	•	•		
	Home accessories and decorative articles (made of wood)	EEA			
	Mixtures considered dangerous goods				
Apparel	All types	•	•	EEA	EEA
Fashion accessories	All types	•	•	EEA	EEA
Jewellery	All types	•	•	EEA	EEA
Watches (excl. Smart watch)	All types	•	•	EEA	EEA
Travel goods and saddlery	All types	•	•	EEA	EEA
Footwear	General footwear	•	•	EEA	EEA
	Footwear with special anti-slip properties	•	•		
	Footwear with LEDs	•	EEA		
Eyewear	Fashion glasses (no filter)		•	EEA	EEA
	Sunglasses, ski and swimming goggles	•	EEA	EEA	EEA
	Prescription glasses (sight correction)				
Body protection gear	Clothing with UV protection	EEA	EEA	EEA	EEA
	Personal Protective Equipment class I + II	EEA	EEA	EEA	EEA
	Personal Protective Equipment class III				
	Swimming aids such as buoyancy aids		EEA		

Product Category	Examples	WHS	Lounge	PP/CR	ZFS
Toys	Toy books, soft toys, dolls	EEA	EEA	EEA	EEA
	Educational toys and puzzles	EEA	EEA	EEA	EEA
	Building sets > 36 months	EEA	EEA	EEA	EEA
	Electrical toys	EEA	EEA		
	Video games and consoles				
	Toy helmets (imitating PPE)				
	Food imitating toys				
	Military- and weapon-imitating toys				
	Toys with magnetic, chemical or organic elements				
	Toys with taste or smell elements				
	Outdoor: Bicycles, baskets, scooters, play tents				
Electric and electronic equipment	Multimedia devices and accessories	EEA	EEA	EEA	EEA
	Electric care and styling devices	EEA	EEA	EEA	EEA
	Luminaires and lamps	EEA	EEA		
	Light sources		EEA		
	Household appliances (other than white goods)		EEA		
	Devices > 20 Wh per cell / 100 Wh per battery				
	Devices with intended medical purpose				
	Separate batteries and accumulators				
Furniture	All types (non motorised, no hydraulic or lever function)		EEA		
Kitchenware	Crockery and cutlery	EEA	EEA		
	Food containers, lunch boxes, sippy cups	EEA	EEA	EEA	EEA
	Pots, pans, cookers		EEA		
	Electric kitchen appliances		EEA		
	Food scales		EEA		
Infant and toddler products	Infant self-feeding devices				
	Strollers, child and infant seats				
	All other types	EEA	EEA	EEA	EEA
Pulp and paper products	Note books, calendars	EEA	•		
Recreational gear	All types		•		
Machinery	All types				
Products for professional use	All types				

2.3 Legislative Reference

It's imperative that products intended for sale must comply with the respective national legislation in Zalando sales countries as well as the EU General Product Safety Regulation (GPSR) 2023/988, as well as the UK General Product Safety Regulations 2005 and the Swiss Product Safety Act (PrSG).

The partners are required to assess the national transpositions of legislation for the agreed Zalando sales countries and ensure that products consistently meet the stricter national requirements. The legislative references in this manual and summarised legal requirements may not be comprehensive or up to date due to ongoing legislative changes.

Link to legislative platforms

• EU: https://eur-lex.europa.eu

• CH: https://www.fedlex.admin.ch

UK: https://www.legislation.gov.uk

Non-comprehensive overview of relevant legislation, excluding amendments, secondary legislation and transposition into national law:

Product examples	Legislative reference	Market
All products	Market Surveillance Regulation (EU) 2019/1020 General Product Safety Directive 2001/95 General Product Safety Regulation (EU) 2023/988 Waste Framework Directive (WFD) (EU) 2008/98/EG REACH Regulation (EC) No 1907/2006 Synthetic Polymer Microparticles Regulation (EU) 2023/2055 POP Regulation (EU) 2019/1021 Conflict Minerals Regulation (EU) 2017/821 Deforestation Regulation (EU) 2023/1115	EEA
	 General Product Safety Regulations 2005 Product Safety and Metrology Regulations 2020 	UK
	 Bundesgesetz über die Produktesicherheit (PrSG) Lebensmittel- und Gebrauchsgegenständeverordnung (LGV) Chemical Risk Reduction Ordinance (ORRChem) 	СН
	 Identification of packaging materials Decision 97/129/EC Packaging and packaging waste Directive 94/62/EC Directive (EU)2019/904 Reduction of the impact of single used plastic 	EEA
Packaging	Decree No. 2014-1577	FR
	Decreto Legislativo 3 settembre 2020, n. 116	IT
	Real Decreto 1055/2022	ES
Non-cosmetic care, scented candles	 CLP Regulation (EC) No 1272/2008 Aerosol Dispensers Directive (ADD) (EU) 75/324/EEC Volatile organic compounds (VOC) Directive 1999/13/EC 	EEA
Cosmetics	Cosmetic Products Regulation (EC) No 1223/2009 CMR Substances Regulation (EU) 2023/1490 Allergenic Fragrances Regulation (EU) 2023/1545 Cosmetic Products Regulation - UV filters (EU) 2022/1176 Claims Regulation (EU) No 655/2013 Common ingredient names Decision (EU) 2022/677 Measuring instruments and methods Directive 2009/34/EC Nominal Content Directive 76/211/EEC	EEA
	Verordnung des EDI über Kosmetische Mittel (VKos)	CH
Sanitary towels (pads), wet wipes	 Single-use plastic products Directive (EU) 2019/904 Single-use plastic product marking Regulation (EU) 2020/2151 	EEA
Clothing, textiles	Textile Labelling Regulation (EU) No 1007/2011	EEA
Footwear	Footwear Labelling Directive 94/11/EC	EEA
Body protection gear, sunglasses, goggles, apparel with UV protection	PPE Regulation (EU) 2016/425	EEA
Tour	Toys Safety Directive 2009/48/EC	EEA
Toys	Spielzeugverordnung (VSS)	СН
Electric appliances	 LVD 2014/35/EU EMC Directive EMC 2014/30/EU RoHS Directive 2011/65/EU WEEE Directive 2012/19/EU Medical Device Regulation (EU) 2017/745 	EEA
Energy related products	 Energy-related Products Directive (ErP) 2009/125/EC Energy Labelling Regulations (ELR) (EU) No 2017/1369 Energy Labelling Regulations (EU) 2021/340 	EEA
Radio equipment	Radio Equipment Directive (RED) 2014/53/EU	EEA
Lighting	 Single Lighting Regulation (SLR) (EU) 2019/2020 Energy labelling Regulation (EU) 2019/2015 	EEA
Scales, measuring cups	 Non-automatic weighing instruments Directive 2014/31/EC Measuring instruments and methods Directive 2009/34/EC 	EEA
Batteries	 Batteries and waste batteries Regulation (EU) 2023/1542 Batteries and waste batteries Regulation 2006/66/EC Labelling rechargeable batteries Regulation (EU) No 1103/2010 	EEA
Crockery, cutlery, kitchenware with food contact	 Food Contact Materials Regulation (EC) No 1935/2004 Risk assessment Regulation (EU) 2019/1381 	EEA

Product examples	Legislative reference	Market
	 GMP Regulation (EC) No 2023/2006 Plastic Materials Regulation (EU) No 10/2011 Recycling Regulation (EU) 2022/1616 Ceramic articles Directive 84/500/EEC Epoxy derivatives Regulation (EC) No 1895/2005 Bisphenol A in varnishes and coatings Regulation Melamine plastic kitchenware Regulation (EU) No 284/2011 Metals Resolution CM/Res (2013)9 DGCCRF DM/4B/Com/001 Regenerated cellulose film Directive 2007/42/EC 	
Infant feeding, soothers	 Rubber teats and soothers Directive 93/11/EEC Infant feeding bottles Regulation (EU) 321/2011 	EEA
Pressure cookers	Pressure equipment Directive 2014/68/EU	EEA
Furniture	 Timber Regulation (EUTR) (EU) No 995/2010 Deforestation Regulation (EUDR) (EU) 2023/1115 	EEA

3. Partner responsibilities

Zalando prides itself on differentiating itself through its high quality standards. Ensuring and maintaining excellent product quality throughout the entire supply chain is our fundamental expectation from our Partners.

3.1 Due Diligence

Partners are required to demonstrate compliance through established due diligence procedures, including the provision of product test reports, certificates, and internal inspection records, based on documented pre-market safety risk assessments for each product intended for sale. Upon request, partners must provide the required proof in a digital format and in the language specified by Zalando. The standard language for all documents is English. Partners must retain all documents for a period of 10 years from the date when a product (or the last batch) was placed on the market.

3.1.1 Quality Assurance Procedures

Partners commit to effective product quality assurance processes and procedures. We expect Partners to continuously improve product quality, using feedback to refine processes. Quality standards are actively communicated, understood and effectively demonstrated throughout the Partner's organisation. This includes diligent management of internal documents and product related files.

Partners are required to align their quality assurance procedures with the QAM, integrating testing, control measures, inspections, and certification throughout the stages of production and supply chain. This includes ensuring matching descriptions and size charts within acceptable limits, maintaining quality cutting tools like blades, scissors, and knives, implementing good housekeeping practices for clean and hygienic workstations, and delivering A-grade quality products in suitable packaging.

3.1.2 Material Compliance

General material due diligence

Due diligence in product compliance is essential for companies operating within the EU to ensure that their products do not contain restricted substances that could pose risks to human health and the environment. This process involves a comprehensive assessment of potential restricted substances as defined by the REACH (Registration, Evaluation, Authorisation, and Restriction of Chemicals) regulation, Persistent Organic Pollutants (POP) regulation, and Biocidal Products Regulation. To effectively conduct due diligence, companies must implement thorough testing and assessment procedures to evaluate the presence and concentrations of restricted chemicals. This includes, testing for restricted substances, assessment of chemical concentrations, notification and reporting.

Material used for product packaging and accompanied paper documents

Business partners are required to assess and comply with additional regulatory requirements for all product packaging including the reduction of heavy metals and/or the restriction of banned substances for packaging as defined by the EU Packaging and Packaging Waste Directive, as well as national legislation on prohibition of mineral oils used in the printing of packaging. From 2025 onwards, this prohibition will also apply to any papers printed for the public, including any paper documentation included with the product and therefore.

Products containing wood-based materials

Business partners are required to assess and comply with additional regulatory requirements for wood-based products under the EU Timber Regulation (as long as it remains applicable) and the EU Deforestation Regulation (as soon as it comes into effect and repeals the EU Timber Regulation). The EU Deforestation Regulation applies to the following commodities: palm oil, soy, beef, cocoa, coffee, and wood. The relevant Zalando assortment that is impacted are wood-based furniture and kitchenware and business partners must ensure that such products are deforestation-free and legally produced, which includes implementing robust traceability systems and conducting due diligence.

Products containing conflict minerals

Business partners are required to assess the quantity and supply chain origins of products containing tin, tantalum, tungsten, and gold (commonly referred to as 3TG minerals) to ensure that these materials are not contributing to the funding of armed groups or security forces in conflict-affected regions. The EU Conflict Minerals Regulation mandates that partners follow the due diligence recommendations outlined in the OECD Due Diligence Guidance, to responsibly source these minerals and ensure ethical practices throughout the supply chain.

Materials in contact with food

Business partners are required to assess and comply with all regulatory requirements applicable to food contact materials, and ensure that products coming in contact with food meet chemical thresholds and migration limits defined in specific Union legislation on certain materials, including on plastic, metals and ceramics, as well as with National legislation on other materials. In addition to this Regulation, all Food Contact Materials (FCM) must be manufactured in accordance with Good Manufacturing Practices.

3.1.3 Product Testing, Certification and Inspection

Partners are required to demonstrate that each product's manufacturing / delivery batch went through internal quality checks and independent accredited testing laboratories, ensuring compliance and mitigation of assessed risks. Zalando accepts in general only proofs that are not older than 12 months (Zalando only accepts test reports that are no older than one year from the date the product or batch was introduced to the market/delivered to Zalando), referencing the applied test methodologies, product identification details, batch number, and component-level results. In detail that includes:

Chemical testing

Partners ensure chemical compliance by ruling out chemical risks and presence of chemical substances, harmful to human health or the environment beyond required chemical limits. Tests are crucial for quantifying chemical concentrations in raw materials, finished products. Partners are expected to comply with regulatory limits set by regulatory bodies like the European Chemicals Agency (ECHA) and limits outlined in Zalando's Product Restricted Substance List (PRSL) (see Annex I Product Restricted Substances List and Chemical Policy)

Mechanical testing

Partners ensure physical compliance by ruling out mechanical risks such as the structural integrity, durability, and mechanical properties, harmful to human health in particular to vulnerable customer groups, following relevant standards. Techniques such as mechanical testing, thermal analysis, and microscopy are utilised to assess product performance under various conditions. Products must be designed and manufactured to minimise physical risks during normal use.

Artwork testing

Partners ensure compliant artwork by ruling out formal non-compliance and health risks ensuring complete physical, mental and social well-being due to missing, misleading or humiliating visual and graphic elements, following product-related legislation and standards. This also encompasses assessments of colour accuracy, legibility of text, and inclusion of mandatory product identifiers, consumer information, and compliance markings.

Proof of Certification

Partners ensure that product (marketing) claims are sound and compliant and backed by credible certifications and evidence to not mislead consumers about the performance or environmental benefits of a product. By undergoing third-party certification, Partners demonstrate their commitment e.g. to sustainability, build trust with consumers, and differentiate their products in the marketplace.

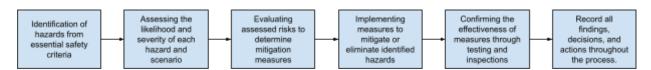
Quality Inspections reports

Partners ensure that production and delivery batches are inspected. Inspection reports must record production/delivery batch, inspection date, inspection method, detailed inspection result and include functionality check e.g. for zippers as well as packaging and labelling checks. Each Delivery is free from any damage, contamination (such as mould* or insects), or free from sharp objects (needles, safety pins etc.).

*Zalando does not recommend a preferred mould prevention supplier. Any mould prevention products used must be registered according to REACH Regulation EC No - 1907/2006 and, if applicable, according to Biocide regulations (EU) No 528/2012 at partners' responsibility. All devices should be marked with the product name / product manufacturer and with appropriate safety instructions.

3.1.4 Risk Assessment

Partners must ensure that products undergo a comprehensive internal pre-market safety risk assessment in line with GPSR Article 6, as well as any additional essential requirements set by applicable EU harmonisation legislation. The manufacturer is responsible for conducting this assessment, proportionate to the product's complexity and potential risks. This includes identifying all possible hazards associated with the product. The analysis must be documented in the technical file, along with the documentation of implemented measures to mitigate or eliminate identified hazards.



Demonstrating adherence with European standards published in the European Union Official Journal (OJEU) indicates that products meet safety requirements. If no harmonised standards are available, verifying product safety requires evaluating several key factors. These include national standards that align with European standards not yet harmonised, European Commission guidelines on product safety assessments, industry-specific codes of good practice, the latest technology and industry insights, and Zalando's reasonable expectations for safety.

In terms of risk reduction measures, if assessed risks are deemed unacceptable, steps are taken to mitigate or eliminate identified hazards. This might entail product redesign, incorporation of safety features, provision of warnings or instructions, or implementation of safeguards e.g. testing to minimise risks. The following aspects, among others, must be taken into account:

- Characteristics, design, technical features, composition, and packaging
- Interactions with other products, non-embedded items
- Presentation, labelling, age suitability, warnings and user instructions
- Vulnerable consumer groups e.g. children, older people and persons with disabilities
- Potential misuse / confusion with other products e.g. child appealing, food imitating

3.1.5 Assessment of Economic Operator Role

Partners must evaluate their own economic operator role as well as the role of other legal persons involved in the supply chain and determine if affected products have a designated responsible person within the European Economic Area (EEA).

Economic roles

- **Manufacturer**: The legal entity identified on the product label, established within or outside the EEA, responsible for manufacturing or designing and producing the product under its own name, trademark, or brand.
- **Importer**: Where the manufacturer is not established in the EEA, this refers to the legal entity identified on the product label, established in the EEA, who places a product from a third country on the Union market.
- **Distributor**: The legal entity established in the EEA, other than the manufacturer or the importer, who makes a product available to consumers and/ or business partners in the EEA.
- **Authorised Representative**: Legal entity established within the EEA who has received a written mandate from a manufacturer to act on that manufacturer's behalf in relation to specific tasks regarding the manufacturer's obligations.
- Fulfilment Service Provider: Legal entity in the course of commercial activity, at least two of the following services: warehousing, packaging, addressing, and dispatching, without owning the products involved, and excluding postal services as defined.

If no legal entity established in the European Economic Area (EEA) other than Zalando is responsible for the affected products in the EEA, nor is any EEA legal entity indicated on the product label as required by chapter <u>3.2 Product Labelling and Packaging</u>, and Zalando agrees with the Partner to act as the EU importer (thus becoming the EU responsible person for the items), the Partner is always obliged to:

1. Submit the Technical Documentation

Provide comprehensive 'Technical Documentation' for each product through Zalando's interfaces. At a minimum, the technical documentation should cover the elements outlined in Chapter <u>3.3.1 Product Documents</u>.

2. Apply the Zalando Importer Address

Label each individual product with the Zalando Importer Address as specified in Chapter <u>3.2.1 Product Traceability and Identification</u>.

3.1.6 Zalando Due Diligence Programs

Partners are required to participate in testing and due diligence programs upon Zalando requirements. Partners might be obliged to register with external service partner websites and to commission a third party laboratory at Zalando's request. Partners are also aware that Zalando conducts random spot checks and may commission independent third parties to conduct them.

Inbound deliveries may be subject to warehouse inspections based on Industry Standard Acceptable Quality Level (AQL) of 2.5 for Major defects and 4.0 Minor defects. This helps to objectively monitor partner performance, reduce faulty items, and prevent them from reaching customers. No critical defects are accepted.

Zalando reserves the right to change the AQL level and/or inspection procedure if deemed necessary due to Partner performance or business needs.

In addition, as we cannot cover all deliveries with an inbound inspection, manufacturing defect items will be sorted in the return process based on Zalando Quality Standard and these costs incurred for defective products will be transferred to the Partners. In order to avoid failures of AQL which require a full inspection, there is a need to implement a Quality Assurance System in the supply chain.

Useful links:

- Annex III: Guidelines to Classification of Product Failures
- Annex VI: Mandatory Onboarding Conditions for new Wholesale Partners

3.2 Product Labelling and Packaging

Partners are required to assess the legal labelling requirements and ensure that products comply with them. The requirements apply also to exhibition and photoproduction samples. Mandatory information must be prominently displayed on the product, appropriately sized, readable, and durable, remaining intact after opening. All labelled information must be affixed in the languages of agreed Zalando's sales markets. Information solely accessible via supplied internet links, is generally insufficient when not explicitly permitted.

Product labelling requirements:

- Affixed solely in the responsibility of the manufacturer
- Visible, legible and indelible, proportionate to the specification
- On the product or, to the packaging and accompanying documents
- If missing, incorrect, misleading, or misused, products shall not be sold

3.2.1 Product traceability and identification

Partners assess the applicable regulatory requirements for product identifiers and ensure their products comply with them. They must identify and trace their products throughout the lifecycle, and monitor any arising product issues. Product identifiers aid in narrowing down the impact of potential product issues.

Batch, Serial Numbers or other identification elements

Products must be marked with a batch or serial number, or other identification elements. Partners are required to track their products across the supply chain and provide traceability attributes of individual units.

EU address and contact details

Products must be sold solely under the responsibility of an EU responsible person. The EU responsible person must be marked with both the postal and electronic address on the product. Where the single contact point at which e.g. customers or market authorities can reach out to, differs from the EU responsible person's postal and electronic address, the contact point's address details must be additionally indicated on the product. Where this is not possible due to the nature of the product, the respective EU address and contact details must be affixed on the packaging and/or accompanying documents:

- Name and postal address of the manufacturer/ importer/ responsible person, established in the European Union.
- Electronic contact address (email address or website*) of the manufacturer/ importer/ responsible person, established in the European Union.
 - * 'Electronic address' means a single point of contact that enables the efficient redirection of digital communications to the appropriate service for consumers and market surveillance authorities. It serves as a direct interface for communications regarding product safety issues and must be either a web address leading to a digital contact form or an email address.

Zalando Importer Address

If no legal entity established in the European Economic Area (EEA), other than Zalando, is responsible for the affected products in the EEA, and if Zalando agrees with an affected Partner to act as the EU importer (thereby becoming the responsible person for the purchased items in the EEA), the Partner is required to label each individual product with the Zalando importer address prior to delivery, as follows:

Zalando SE Valeska-Gert-Str. 5 10243 Berlin, Germany

Email: Importer_product.safety@zalando.de

Website: https://zalando.de

3.2.2 Instructions for use and warnings

Partners are required to assess the regulatory requirements and any additional need for instructions for use and warnings and ensure that products comply with such requirements and needs.

Instructions for use and warnings must be in the languages of agreed sales countries, they must be easily understood by consumers and end-users and offer comprehensive guidance for the proper use, maintenance, and disposal of the product. This includes all necessary information for safe use, covering assembly, installation, operation, storage, maintenance, care, and disposal.

3.2.3 Sorting and Disposal of Waste

Product waste

Partners are required to assess EU-wide and country-specific sorting and disposal requirements for waste, including associated labelling and registration requirements, and ensure that their products comply with such requirements. Sorting and disposal information shall not mislead consumers. Partners may be required to provide a copy of the assessment and registration certificate.

Triman logo

Triman logo and associated sorting information must be at least 1 cm x 1 cm, accompanied by language indication, packaging pictograms, and disposal instructions in French.



Example: Label for sorting of packaging

Packaging Waste

Packaging must display packaging waste identification codes and comply with additional national legislative requirements in relation to waste disposal labelling requirements such as for Italy, Spain, and France (see below). All packaging (all primary, secondary and tertiary packaging), including primary product packaging, must be registered in the central LUCID register.

Möbius loop on Packaging

Möbius loop symbol, accompanied by material abbreviation and number as well as disposal instructions "Raccolta [material]" in Italian.







Example: Collection of paper

Triman logo on Packaging

Triman logo and associated sorting information must be at least 1 cm x 1 cm, accompanied by language indication, packaging pictograms, and disposal instructions in French.



Example: Label for sorting of packaging

Spanish Sorting Label on Packaging

Label must indicate the container in which packaging waste must be disposed of (e.g. blue for paper, yellow for plastics, etc.), preferably in order to avoid confusion (but not necessarily) in Spanish.



Example: Label for plastic packaging

3.2.4 Packaging Volume and Weight

The packaging of Partners' must also comply with relevant manufacturing and composition requirements, as laid down in the EU Packaging and Packaging Waste Directive. As such, Partners must ensure that the packaging they are using is limited by volume and weight to the minimum adequate amount to maintain the necessary level of safety, hygiene, and acceptance for the packed products and for the consumers i.e. product packaging must be reduced to the minimum necessary for its functionality.

3.2.5 Digital Product Passport (DPP) (not yet obligatory)

The Digital Product Passport (DPP) aims to provide comprehensive information about the product, in order to promote transparency, responsible consumption, and make information available to every actor along the value chain of a product, including the producers, retailers, customers, repairers, and recyclers.

The DPP will create a "digital twin" of every product and will be the core data source for product data. The following information can be part of the DPP (please note, this is not an exhaustive list and more specific guidance on what information must be included will be issued in the near future).

Essential Information

- Unique product identifier
- Information on SVHCs
- Information on product performance
- User instructions
- Global Trade Identification Number as per ISO/IEC 15459-6 or equivalent of products or their parts
- Relevant commodity codes, such as a TARIC code
- Compliance documentation, including declaration of conformity, technical documentation, and conformity certificates
- Operator identifiers: manufacturer / importer / EU responsible person
- Relevant information related to unique facility identifiers.

Even if the DPP is not obligatory yet, it is expected to come into force in 2027 and will then be prohibited to market products without a DPP available. Therefore, early preparation for its requirements and data will ensure its compliance once it comes into force.

3.3 Product Documents and Data

Partners are required to provide and maintain product documentation and product data in digital format, while ensuring prompt and accurate responses to Zalando's document and data inquiries during onboarding and throughout the ongoing business relationship.

3.3.1 Product Documents

Partners are required to assess the regulatory requirements for the technical documentation of products and ensure to comply with such requirements and provide these documents for each article in scope offered at Zalando. Upon reasoned request from Zalando, Partners are required to transfer associated product documentation in a format and language specified by Zalando. The standard language for the product documentation is English. Partners are obligated to retain the documentation for a period of 10 years from the date when a product (or the last batch) was placed on the market.

The technical documentation is created by the manufacturer, containing information demonstrating the products' safety. This documentation should be based on an internal risk analysis conducted by the manufacturer and should be proportionate to the complexity of the product and its potential risks.

Requirements for maintaining records of the technical file and associated documentation for a specified period, typically at least 10 years after the product is placed on the market.

Product group	Technical documentation
All products	Product description Product picture Essential product characteristics, design, technical features and packaging Any declared and measured electrical, luminous, chemical and safety parameters Product and packaging labelling Manufacturer, postal address and electronic contact address Responsible person, postal address and electronic contact address EAN / GTIN Model / type code Disposal information Any warnings and safety information Any warnings and safety information Any date of validity Any markings such as CE marking, wheeled bin, Triman logo etc. Any information on nominal content, material composition, ingredients etc. Any product classification e.g. energy efficiency label, protection class etc. Any claims such as technical parameters, product promises and sustainability
	Instructions for use (if applicable) Information on use / assembly / installation / operation / care / maintenance Disposal information Any markings such as CE marking, wheeled bin, Triman logo etc. Any warnings and safety information in required languages
	Risk assessment Sufficient reference to the product / product batch offered Assessment criteria of GPSR Article 6 and applicable harmonisation legislation

	Reference to applied technical standards and measures taken		
	Bill of material / parts list		
	List of product components / materials / ingredients / composition used		
	Test results		
	 Sufficient reference to the product / product batch offered 		
	 Complete reference to applied technical standards and legal thresholds 		
	Documented parameters and results of applied test method as appropriate		
	Carried-out and signed by an independent, accredited test laboratory		
Additionally for all	EU declaration of conformity		
CE-marked products	A number identifying the product		
•	Name and address of the EU manufacturer or the EU authorised representative		
	A statement that the DoC is issued under responsibility of the manufacturer		
	Identification and description of the product allowing traceability		
	A colour image of sufficient clarity		
	EU harmonisation legislation		
	 Referenced standards or other technical specifications 		
	 Name and identification number of the notified body (where applicable) 		
	Supplementary information		
	Date and signature by the EU manufacturer or EU authorised representative.		
Additionally for all light	Energy label		
sources and separate	Supplier's name		
control gear	Model identifier		
J	 Scale of energy efficiency classes from A to G 		
	The energy efficiency class of this product		
	Energy Consumption in kWh per 1 000 hours		
	QR Code		
	Reference to Regulation '2019/2015'		
	Product information sheet		
	Supplier's name or trademark		
	Supplier's address		
	Model identifier		
	Type of light source		
	Product parameters		

3.3.2 Digital Product Data

The partner agrees to the submission of product data and information through Zalando's online interfaces which must be up-to-date and matching with the product offered.

The partner agrees to regularly review this data and report any errors to Zalando immediately. Missing, misleading or incorrect information is a subject to non-compliance and might result in return or cancellation.

Digital product data serves multiple purposes, such as integration into customer-facing content directed to our online product offering and file-based verification.

Product group	Digital Product Data
All products	Name, registered trade name or registered trade mark of the manufacturer, as well as the postal and electronic address at which they can be contacted: • Manufacturer name • Manufacturer postal address • Manufacturer electronic contact address Where the manufacturer is not established in the Union, the name, postal and electronic address of the responsible person:

	 Responsible person name Responsible person postal address Responsible person electronic contact address Responsible person role
	Information allowing the identification of the product: • EAN / GTIN • Type / number model
	Any information relating to the safe use of a product or potential hazards associated with a product that is affixed to the product or its packaging, or included in an accompanying document: • Warnings and safety information
Sunglasses for general use and eye and face protection for sports use	 Filter / tint category Filter / lens type
Textiles with solar UV protective properties	UPF filter class
Energy-related products such as luminaires	Energy classes are typically categorised from A to G, with A being the most energy-efficient and G being the least: • Energy class

3.4 Notification and Reporting

Where a partner considers or has reason to believe, on the basis of the information in that partner's possession, that a product is a dangerous product, the partner shall immediately inform Zalando thereof. This includes notifying the market surveillance authorities in the Member States where the product has been made available, through the Safety Business Gateway.

3.4.1 Reporting of Product Issues

Partners are required to report any product issues to Zalando Product Quality and Safety Departments (specific contact details are available here: <u>6. List of contacts</u>) no later than 2 business days after identification and to inform the responsible government authorities in their country immediately in the event of justified safety concerns. If Zalando does not receive a copy of the Partner's report to the authorities, Zalando will inform the competent authorities. Partners must address product issues and safety concerns formally through a legal statement, including clear information about the product, risks, remedies, and customer rights.

Upon reasonable request and in case of product failures, Partners are required to provide Zalando with independent 3rd party assessments, e.g. physical or toxicological risk assessments within 5 business days.

Partners are required to register on public product safety alert platforms, and thoroughly monitor products before selling them. Vice versa Partners must also maintain open communication channels and provide access to information on product identification, risks, and actions taken on their website.

Partners agree to recognise reasonable recall decisions and related compensation for direct costs and damages incurred by Zalando. The partners also agree that Zalando will publish the information on its own website and inform its affected customers by email. In addition, partners agree to withdrawal products and customer-facing content suspected of being harmful or illegal.

Useful links:

• EEA: Business Safety Gateway, RASFF Window

• DE: <u>Lebensmittelwarnung.de</u>, <u>BAuA</u>

• UK: GOV.UK

• CH: RecallSwiss, BFK

FR: <u>Rappel</u>Global: <u>OECD</u>

3.4.2 Collaboration on Complaint Data

Partners are required to cooperate with Zalando on legitimate customer complaints in cases of known product risks or legitimate concerns. Partners keep a comprehensive register of complaints from B2B and B2C customers, of non-conforming products and recalls, and keep Zalando informed of any such monitoring. This register should include relevant details such as the nature of the complaint, date received, action taken and current status of resolution. The information shared should be limited to what is necessary to investigate complaints. Protecting the confidentiality and security of customer information stored in the register and ensuring compliance with data protection regulations such as the EU's General Data Protection Regulation (GDPR) is paramount. This data should only be retained for as long as necessary for investigative purposes, but no longer than five years after initial entry.

3.4.3 Substances of Very High Concern

All Partners are required to identify if their products contain Substances of Very High Concern (SVHCs) and provide information on whether or not SVHCs are present above 0.1% weight by weight (w/w) to Zalando prior to any sales. Zalando, in turn, will communicate this information to requesting consumers. In the event that SVHC information is not available at the time of the customer's request, Zalando grants the Partner a lead time of 5 working days to obtain this information.

Relevant to EEA-Partners: EEA-Partners are required to ensure that the responsible EU manufacturer or EU importers has submitted information of products containing SVHCs above 0.1% w/w to the SCIP database. The database aims to improve transparency regarding SVHCs in products throughout their lifecycle. Zalando tracks the Partner's submission of SVHC information and facilitates the provision of information upon third-party request.

Relevant to Non-EEA Partners: Non-EEA Partners are required to share information of products containing SVHCs above 0.1% w/w with Assent, a third-party provider

commissioned by Zalando, who requests SVHC information on style/component levels biannually. If products contain no SVHCs above the threshold, a declaration confirming this status is required.

3.5 Contractual fines

Partners must adhere to the QAM and ensure products comply with assessed requirements. In this context, Partners also commit to indemnify Zalando for direct damages and costs resulting from non-compliance. Zalando reserves the right to apply contractual fees outlined in the table below and may further penalise Partners who attempt to supply non-compliant products.

Following cases, the list is not exhaustive, result in product non-compliances and a chargeback or the affected products:

- Product recalls*,** / Safety Notifications
- Non-A Grade*** Deliveries (e.g. damaged goods, mouldy goods...)
- Missing mandatory Article Master Data Sheet (AMD Sheet)
- Missing, misleading or incomplete labelling/marking (e.g. missing CE-mark)
- Direct losses and damages from not being able to market the delivered goods

Associated costs are based on the actual purchase price, administrative and operational costs associated with the process including cost for processing communication to the end customer and, if applicable, cost of inventory check.

A detailed list is available here:

Product non-compliance	Chargeback - associated costs
Product recalls / Safety Notification	Fee based on actual purchase price after discount for returned and refunded items, including administrative and operational costs associated with the process. Partner Program: A full refund to the customer is needed for returned items. Partners must provide customer return labels for shipment of recalled articles.
Detailed Breakdown costs of Product recalls /	Safety Notifications*
Product recalls / Safety Notification - Stock value	Purchase Price cost >150€ is charged back or returned at partners' costs ZFS: all product costs, auditing and handling costs will be charged back to the partner.
Product recalls / Safety Notification - Administrative cost	Cost for processing communication to the end customer and, if applicable, cost of inventory check.
Product recalls / Safety Notification - Logistic and handling cost	Handling cost, logistic costs for processing returns from customer
Product recalls / Safety Notification - Product Testing	All Laboratory costs, shipment fees and testing sample costs
Non-A Grade Delivery: Refusal to inbound and Partner contacted	Pick up of goods at Partner cost and all costs transferred to Partner. In case of hazardous failures a destruction of goods can be agreed between Zalando and the partner on partner's costs.

ZFS only: Return of stock is arranged by Zalando and all costs incurred charged back to the partner
liveries***
Purchase Price cost >150 € is charged back or returned at Partner' costs ZFS only: all product costs, auditing and handling will be charged back to the partner
1.50€ per item inspected
Differential between No claims % in contract and returns %, plus additional handling costs
In the event of missing, inconsistent, incorrect or overdue information the affected purchase order will be cancelled and existing stock will be withdrawn from sale and returned at the partner's expense.
In the event of missing, misleading or incorrect labelling (e.g. wrong fibre composition) /marking the affected purchase order will be cancelled and existing stock will be withdrawn from sale and returned at the partner's expense. Additionally, non-compliance charges can be imposed due to product safety issues.
Full chargeback of all related costs

^{*}In case of product legal failures and if the stock is below 800€ Zalando reserves the right to handle this stock at its own discretion.

Zalando's product safety teams require return labels from Partner Programm & Connected Retail to execute the customer communication about non-compliance. Also, a full refund to the customer is needed for returned items. Unless otherwise agreed, the partner is responsible for tracking returns & refunds from the customer

4. Product-specific requirements

4.1 General Clothing and Textile Products

Partners must assess and ensure compliance with additional regulatory requirements for clothing and textile products in agreed sales markets. Textile products—such as clothing, furniture coverings, mattress coverings, and tents—are subject to the Textile Fibre Regulation if they consist of at least 80% textile fibers by net textile weight.

Key Chapters and Requirements for General Clothing and Textile Products

- 2. Scope of Operation
- 3. Partner responsibilities
- 4.1 General Clothing and Textile Products

^{**}Please note that, in case of legal failures a recall from end users must be conducted for the failed products. Regarding returned units from customers due to recalls, Zalando reserves the right to handle the stock at its own discretion unless otherwise agreed. All Fees of handling these items (return to partner/destructions) is going to be charged to Partners

^{***}A-grade deliveries are delivery/items that meet the highest standard of quality, labelling/ marks, performance and conditions.

• Annex I: Product Restricted Substances List

Vulnerable user groups

Risk Assessment

The risk assessment of clothing in smaller sizes shall address vulnerable user groups, even if not marketed for children, as outlined in the table below.

Category	Age	Body Height
Baby	0 - 36 months	=98cm</td
Young child	3 - 6 years and 11 months 98 ≤133 cm	
Older child and young person	7 -14 years	Girls: 134 ≤176 cm Boys: 134 ≤182 cm

Product Testing, Certification and Inspection

Clothing intended for children must be free of metal and safety pins, including for label attachments, to reduce injury risk. Partners must also ensure children's clothing complies with relevant standards in Annex VI.I (see <u>Annex IV - Testing of children's products</u>)

Additional Labelling Requirements

Textile fibre composition label

The textile fibre composition label shall meet the following criteria:

- Only fibres names, which are officially listed in (EU) No 1007/2011 shall be used.
- Trademark or company names may be placed before or after fibre descriptions.
- '100%', 'pure', or 'all' labels apply to single fibre type products.
- Multifibre products list fibres by descending weight.
- Fibres under 5% can be labelled 'other' if they don't exceed 15% of total weight; total is 100%.
- Multi-component textiles must list each component's fibre content.
- Components under 30% of total weight (excluding main linings) don't require separate labelling.
- For unified products, label only one item if both share the same composition.
- Label "Contains non-textile parts of animal origin" if such parts are under 20% of total weight.

Care Instructions

Care labels shall be in accordance with standard EN ISO 3758:2023. They offer essential guidance for washing, bleaching, drying, ironing, and professional care of textiles.

Made in labels

Made in labels are voluntary and indicate a product's true country of origin, ensuring no misleading claims, such as suggesting EU origin for items made outside the EU.

4.2 Clothing with UV Protection

Partners must assess and ensure compliance with additional regulatory requirements for UV-protective clothing in the agreed sales markets. Such clothing, intended to protect against natural sunlight (including partial or full-body coverage), falls under the Personal Protective Equipment (PPE) Regulation (see <u>4.8 Body Protection Gear</u>) and must carry CE marking (see <u>Annex II: CE-Marked Products</u>). Additionally, UV-protective clothing is subject to the Textile Labelling Regulation (see <u>4.1 General Clothing and Textile Products</u>) and must meet all general product and packaging requirements.

Key Chapters and Requirements for Clothing with UV protection

- 2. Scope of Operation
- 3. Partner responsibilities
- 4.1 General Clothing and Textile Products
- 4.2 Clothing with UV Protection
- 4.8 Body Protection Gear
- Annex I: Product Restricted Substances List
- Annex II: CE-Marked Products

Due Diligence

Product Testing

In absence of harmonised standards, products must comply with essential requirements. Clothing with UV protection must be tested against EN 13758-1:2007-03. Zalando additionally recognizes testing according to UV STANDARD 801 or AS/NZS 4399.

Additional Labelling and Technical Documentation

Labelling, assessment and documentation as per Annex II: CE-Marked Products

- The CE mark affixed by the manufacturer.
- The DoC by the manufacturer or the authorised representative.

UPF rating label

The Ultraviolet Protection Factor (UPF) rating must be clearly stated. This rating indicates how effectively the fabric blocks ultraviolet (UV) radiation. For example, a UPF rating of 50+ means that the fabric allows only 1/50th (2%) of UV radiation to pass through it.

Care label

The care instructions shall specify the maximum number of wash cycles until the product loses UV protection abilities and provide guidance on identifying signs of ageing.

Warnings

There should be appropriate warnings and instructions for use, such as:

- "Only covered areas are protected."
- "Protection may be reduced if the fabric is stretched, wet, or worn out."
- "The protection offered by this item may be lessened with use, age, and if washed or cared for incorrectly."

4.3 Infant and Toddler Products

Partners are required to assess additional regulatory requirements for infant and toddler products and ensure compliance with such requirements in agreed sales markets.

Infant and toddler products products, such as dummy chains, pacifiers, changing mats, cot bedding, bibs, and harnesses, specifically designed for children under the age of 3, may be subject to the Textile Labelling Regulation and food contact products in addition to the legislation that applies to all products and packaging.

Key Chapters and Requirements for Infant and Toddler Products

- 2. Scope of Operation
- 3. Partner responsibilities
- 4.1 General Clothing and Textile Products
- 4.3 Infant and Toddler Products
- Annex I: Product Restricted Substances List
- Annex V: Testing of Infant and Toddler Products

Vulnerable user groups

Risk Assessment

When assessing the safety of infant and toddler products, it's essential to consider various risks. These risks may include the potential for injury, choking, strangulation, suffocation, chemical contamination, and other health hazards.

Product Testing

Infant and toddler products must be free of metal and safety pins to be used for any attachments such as labels, to prevent injuries. Additionally Partners are required to ensure that infant and toddler products are tested against applicable standards (see <u>Annex V: Testing of Infant and Toddler Products</u>)

4.4 Travel Goods, Saddlery and Leatherwear

Partners are required to assess additional regulatory requirements for travel goods, saddlery and leatherwear and ensure compliance with such requirements in agreed sales markets.

Travel goods, saddlery and leatherwear, such as bags, backpacks, belts and suitcases, are subject to the general legislative requirements applicable to all products without exception.

Key Chapters and Requirements for Travel Goods, Saddlery and Leatherwear

- 2. Scope of Operation
- 3. Partner responsibilities
- 4.3 Travel Goods, Saddlerv and Leatherwear
- Annex I: Product Restricted Substances List

Specific labelling requirements

Prohibited Marketing Claims

For saddlery and travel goods, indicating non-animal materials is optional but must not mislead; use "artificial" as a prefix, as "faux" is considered misleading. If made with non-textile animal parts, this must be indicated. Optional claims and symbols may highlight material authenticity if permitted or licensed.

Labelling of leather

'Contains non-textile parts of animal origin'

'Genuine Leather'



'Artificial leather'

Claim for non-textile parts

Example: Authentic leather claim

Example: Authentic leather symbol

Example: Artificial leather claim

4.5 Footwear

Partners must assess and ensure compliance with additional regulatory requirements for footwear in the agreed sales markets. Footwear—including shoes, boots, sandals, and slippers—must meet the Footwear Labelling Directive and all general product and packaging regulations.

Key Chapters and Requirements for Footwear

- 2. Scope of Operation
- 3. Partner responsibilities
- 4.5 Footwear
- Annex I: Product Restricted Substances List
- Annex IV Testing of children's products

Due Diligence

Risk Assessment and Testing of Children's Shoes

The risk assessment and testing methods for children's shoes, including smaller sizes unless designated for adults, must demonstrate compliance with the applicable standards outlined in Annex VI.

Category	EU shoe size
Baby shoes	16 - 22
Kids shoes	23 - 40
Adult shoes	36 and bigger

Testing of High Heels

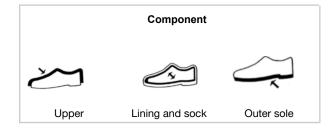
Pumps: Footwear with heels of more than 5 cm in height must be tested against ISO 22650/DIN EN 12785 or an equivalent standard.

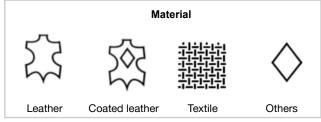
Labelling Requirements

Material Declaration

Footwear must have a material label showing main parts (upper, lining and sock, outer sole) via pictograms in accordance with the Footwear Labelling Directive:

- Three main components (upper, lining & sock, outer sole).
- Declaration shall cover at least 80% of each part's surface area or volume.
- If no material reaches 80%, list the two main materials.





4.6 Jewellery

Partners must assess and comply with additional regulatory requirements for jewellery in the agreed sales markets. Jewellry, including rings, necklaces, bracelets, earrings, and brooches made from precious metals, gemstones, or other materials, must meet specific labelling requirements beyond general product and packaging regulations.

Key Chapters and Requirements for Jewellery

- 2. Scope of Operation
- 3. Partner responsibilities
- 4.6 Jewellery
- Annex I: Product Restricted Substances List

Sales Restrictions

Deviating from the usual requirements, jewellery containing precious metals are prohibited to sales countries Czech Republic, United Kingdom, Romania, Switzerland, Lithuania.

Recycled Jewellery

Items from the same recycled casting are treated as one batch and must meet the same safety standards as conventional jewellery.

Specific labelling requirements

Hallmarking

Jewellery with gemstones and precious metal alloys must be labelled to show the fineness of platinum, gold, silver, and palladium, as well as any gemstone treatments or enhancements.

Essential information

- Marking of precious metals's purity
- Treatment or enhancements to gemstones (natural, synthetic, or treated)
- Hallmark stamp on the jewellery, in a location that does not detract from the design or aesthetic)
- Country of origin

Prohibited marketing claims

Zalando prohibits literal claims like "nickel free," which implies the complete absence of nickel. Jewellery cannot be labelled as "nickel free" if even trace amounts are detectable in chemical tests.

Care instructions

Zalando expects that all jewellery is equipped with sufficient care instructions.

4.7 Electrical Appliances and Batteries

Partners must ensure compliance with additional regulatory requirements for electrical and electronic equipment (EEE) in the agreed sales markets. EEE, including electronic beauty devices, light sources, and mobile media equipment, must adhere to the LVD, RoHS, and EMC Directives. EEE with radio capabilities, such as smartwatches, fitness trackers, mobile phones, and Bluetooth speakers, must comply with the RED Directive. Batteries, whether included in the EEE or sold separately, must comply with the Batteries and Waste Batteries Regulation.

Key Chapters and Requirements for Electrical Appliances and Batteries

- 2. Scope of Operation
- 3. Partner responsibilities
- 4.7 Electrical Appliances
- Annex I: Product Restricted Substances List
- Annex II: CE-Marked Products

Due Diligence

Electrical safety

Electrical testing primarily evaluates the safety and performance of electrical components and systems within products. Key parameters include insulation resistance, electrical continuity, and protection against overcurrent and overvoltage. These tests aim to prevent electric shock, fires, and other hazards, while also ensuring accurate labelling and user instructions.

Materials used in electronic products

Business partners are required to assess and comply with all regulatory requirements applicable to electronic articles, and ensure that all electronic products meet the environmental and safety standards before sale or distribution in relation to restricted substances under the Restriction of Hazardous Substances (RoHS) Directive.

Additional Labelling and Technical Documentation

Labelling, assessment and documentation as per Annex II: CE-Marked Products

- The CE mark affixed by the manufacturer.
- The DoC by the manufacturer or the authorised representative.

Sorting and Disposal Information

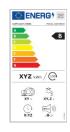
Electrical appliances and Batteries must display the crossed-out wheeled bin symbol accompanied with disposal and sorting information for the waste of batteries (WBA). EEA-Partners must register and report WBA to national registers in Zalando's sales markets and provide the registration number upon request. Batteries containing Hg, Cd, or Pb must display the corresponding chemical symbols.



Crossed out

Labelling of Energy-Related Products

Partners assess if an energy label is required for electronic equipment, ensure it is affixed, and provide digital versions for web display. The label, ranging from A (most efficient) to G (least efficient), must be at least 36mm x 75mm or 20mm x 54mm. It includes a QR code linking to the EPREL database, energy efficiency classes, specific rating, energy consumption, non-energy parameters (e.g., noise, water use, capacity), and a reference to the relevant regulation.



Example: Energy Label

Durability Label on Batteries

Batteries should be valid for at least 12 months upon receipt and have a removable seal, with the expiry date clearly marked.

Capacity label on Batteries

All portable rechargeable batteries must have a capacity label. For NiCad, Ni-MH, and lithium batteries, capacity is shown in mAh (integer) or Ah (decimal). For lead-acid batteries, capacity is indicated as a decimal in Ah. Power tool batteries are excluded.

Individual batteries/accumulators	Battery packs	Button cells /memory back-up batteries	If a label cannot fit on the battery	
At least 1.0×5.0 mm on the item and 5.0×12.0 mm on the packaging. should be on the battery and the packaging, or solely on the item if sold without packaging.	At least 1.0×5.0 mm for packs below 70 cm2 and 2.0×5.0 mm for packs equal to or above 70 cm2. Affixed only to the external housing of the cell assembly, not individual cells.	label size of 5.0 × 12.0 mm on the front of the packaging.	At least 5.0×12.0 mm on the packaging. If there's no separate packaging, the capacity is marked on the appliance packaging.	

4.8 Body Protection Gear

Partners must assess the relevant regulatory requirements for body protection gear and ensure compliance with them, in addition to the outlined requirements in the QAM.

In addition to general legislation that applies to all products and packaging, body protection gear, such as helmets, sunglasses, shin guards, ski and swimming goggles, is subject to the PPE Regulation. Under PPE category classification are also falling interchangeable components for equipment which are essential to its protective function.

Key Chapters and Requirements for Body Protection Gear

- 2. Scope of Operation
- 3. Partner responsibilities
- 4.8 Body protection gear
- Annex I: Product Restricted Substances List
- Annex II: CE-Marked Product

Additional Labelling and Technical Documentation

Labelling, assessment and documentation as per Annex II: CE-Marked Products

- The CE mark affixed by the manufacturer.
- The DoC by the manufacturer or the authorised representative.

Essential information

- The pictogram indicating the user instructions
- Instructions for storage, use, cleaning, maintenance, servicing and disinfection
- Restriction of use as per applied harmonised standard other restrictions deemed appropriate
- Performance data, level or classes of protection
- Where applicable:
 - Accessories and the characteristics of the appropriate spare parts



- Different protection classes and their corresponding usage limits.
- The expiration date of the PPE or its components.
- the type of packaging suitable for transport
- Address details and identification number of the notified body
- The instructions for for care and cleaning
- Description of significance of any markings
- The risk against which the PPE is designed to protect
- The reference to the PPE Regulation and applicable EU harmonisation legislation
- The references to harmonised standard(s), or other technical specifications used
- · A copy of the EU Declaration of Conformity, or the internet address where it can be accessed

Additional Information for Sunglasses

- Identification of model
- · Name and address of the manufacturer
- Reference to EN ISO 12312 standard
- Type of filter, if photochromic and/or polarising
- Number of the filter category marked preferably on the frame of the filter

4.9 Toys

Partners must assess the relevant regulatory requirements for toys and ensure compliance with them, in addition to the outlined requirements in the QAM.

Toys are subject to the toys safety Directive as well as general legislation, which applies to all products and packaging (see 2.3 Legislative Reference).

Key Chapters and Requirements for Toys

- 2. Scope of Operation
- 3. Partner responsibilities
- 4.9 Toys
- Annex I: Product Restricted Substances List
- Annex II: CE-Marked Product

Sales Restriction

Deviating from the general sales scope, toys are restricted to following countries:

Area	Sales Country	Language	WHS	Lounge	PP/CR	ZFS
European Economic Area (EEA)	Austria	German	•	•	•	•
	Belgium	French, Dutch, German	•	•	•	•
	Czech Republic	Czech	•	•	•	•
	Denmark	Danish	•	•	•	•
	Finland	Finnish, Swedish	•	•	•	•
	France	French	•	•	•	•
	Germany	German	•	•	•	•
	Ireland	English	•		•	•
	Italy	Italian	•	•	•	•
	Luxembourg	French	•	•	•	•
	Netherlands	Dutch	•	•	•	•
	Poland	Polish	•	•	•	•
	Spain	Spanish	•	•	•	•
	Sweden	Swedish	•	•	•	•

Due Diligence

Packaging Requirements

Packaging materials can pose suffocation risks to children, so all toy packaging must meet EN 71-1 safety standards for mechanical and physical hazards. Packaging with play value or intended as a toy for children under 14 must also comply with EN 71 standards for safety.

- Minimum thickness of 40μm
- No drawstring closures
- Minimum of 4 air holes of minimum 4mm diameter, spaced on a 30mm grid
- Safety warning on the polybag

Materials used in toys

Business partners must ensure that all toys comply with applicable regulations, including the chemical requirements outlined in the EU Toy Safety Directive, Annex II (III.), Appendices A, B, and C. CMR substances (those that may cause cancer, genetic mutations, reproductive harm, or harm to an unborn child) are prohibited in accessible toy parts beyond the limits set by the Regulation on Classification, Labelling, and Packaging, unless deemed safe through scientific evaluation. Nineteen heavy elements, such as mercury and cadmium, are restricted in accessible parts of toys, as specified by the Toy Safety Directive. Additionally, 55 allergenic fragrances are banned, with some exceptions; 11 additional fragrances may be used if listed on the label and compliant with specific requirements.

Additional Labelling and Technical Documentation

Labelling, assessment and documentation as per Annex II: CE-Marked Products

- The CE mark affixed by the manufacturer.
- The DoC by the manufacturer or the authorised representative.

Instructions for use and warnings

Age-based warnings enhance children's safety by guiding parents to choose suitable toys, reducing accidents. Toys are tested for age-specific risks, and clear age guidelines are required on packaging. Warnings should specify hazards, like small parts or choking risks, while age recommendations alone are sufficient if no hazards exist.



Not suitable for children under 36 months - small Parts

Age 4 +

WARNING! This bag is not a toy. To avoid suffocation danger, keep away from babies and children.

Example of Safety Based Age Warning: Age the product is not suitable for Example of Age Recommendation / no hazard for lower ages: Age the product is suitable for

Example of polybag warning

4.10 Cosmetic Care

Partners must assess and ensure compliance with additional regulatory requirements for cosmetic products in agreed sales countries. Cosmetic articles, such as skincare products, lipsticks, shampoos, and perfumes, are defined as "cosmetic products" under Article 2(a) of the Cosmetic Products Regulation. These products are subject to the Cosmetic Products Regulation and general product and packaging legislation (see 2.3 Legislative Reference).

Key Chapters and Requirements for Cosmetic Products

- 2. Scope of Operation
- 3. Partner responsibilities
- 4.10 Cosmetic care

Sales Restriction

Deviating from the general sales scope, the sales are restricted to the following countries:

Area	Sales Country	Language	WHS	Lounge	PP/CR	ZFS
European Economic Area (EEA)	Austria	German	•	•	•	•
	Belgium	French, Dutch, German	•	•	•	•
	Denmark	Danish	•	•	•	•
	France	French	•	•	•	•
	Finland	Finnish and Swedish	•		•	
	Germany	German	•	•	•	•
	Italy	Italian	•	•	•	•
	Luxembourg	French	•	•	•	•
	Netherlands	Dutch	•	•	•	•
	Norway	Norwegian	•			
	Poland	Polish	•	•	•	•
	Spain	Spanish	•		•	
	Sweden	Swedish	•	•	•	•
Non-EEA	Switzerland	French, Italian, German	•	•	•	•

Due Diligence

Good Manufacturing Practices

All cosmetic products must be manufactured according to ISO 22716 Good Manufacturing Practices (GMP) across the production and supply chain and maintain consistency in formulation and quality across batches.

Materials used in cosmetic products

Business partners are required to assess and comply with all additional regulatory requirements applicable to cosmetic products, ensuring that these products meet the chemical safety standards set forth in specific EU legislation. This includes adherence to the Cosmetic Products Regulation, which mandates comprehensive safety assessments and ensures that cosmetic products are safe for consumers under foreseeable conditions.

Packaging sealing

All openings of beauty and cosmetics products must be sealed to prevent contamination, oxidation, and tampering. Unbroken seals indicate unopened products suitable for resale. Seals should be highly adhesive and damage upon removal. For products in cartons, the carton must be sealed visibly on the outside. Seals should not cover essential product information.

Prohibited Marketing Claims

Statements about a cosmetic product's properties, benefits, or effects must meet six criteria: legal compliance, truthfulness, evidence, honesty, fairness, and promoting informed choices. Partners must provide evidence to support claims. Claims suggesting medical benefits classify a product as medicinal and are not allowed.

Labelling

Product Identifiers

- A responsible person in the Union market.
- The batch number or identification reference
- The country of origin, if the product is manufactured outside the EU

Ingredients Declaration

Ingredients must be labelled on the external side of the packaging with the term 'ingredients'. The ingredients listed follow the names of the International Nomenclature of Cosmetic Ingredients (INCI names) without translation and are arranged in descending order of weight at the time of addition.

Nanomaterial ingredients are explicitly marked with 'nano' in brackets. Colorants, excluding hair dyes, may be listed after other cosmetic ingredients. In decorative cosmetic ranges

with multiple shades, all non-hair dye colorants may be listed with 'may contain' or '+/-' symbols, using CI (Colour Index) nomenclature where applicable.

Information for use and warnings

Must be on both the primary container and secondary packaging. If this is not possible, the information must be provided with an enclosed leaflet indicated by a referencing symbol.



Product function information

Reference to enclosed or attached information

Printed on the container and packaging unless it's easily deduced from factors like its presentation (such as shape or size), name, trademarks, claims (including accepted foreign terms like "waterproof mascara"), or accompanying visuals like pictures or logos.

Nominal content mark

The Θ -mark, indicating nominal weight or volume, is required on packaging except for containers under 5 ml or 5 g, free samples, and single-use packs. Content disclosure isn't needed for pre-packaged items sold in fixed quantities if the count is visible on the packaging or if items are usually sold individually.

Minimum Durability Label

Based on finished product stability studies, two labelling situations apply.

For products with a durability of 30 months or less, indicate the Date of minimum durability (DOMD) with the 'hourglass' symbol or 'Best before the end of' followed by MM/YYYY or DD/MM/YYYY. If the date isn't next to the symbol or phrase, its location must be clearly explained.



Date of minimum durability (DOMD)

For products with a durability over 30 months, indicate the Period-After-Opening (PAO) with an 'open jar' symbol, accompanied by the period in months or years, usually shown as "x M". This can be located inside or outside the symbol.



Period-afteropening (PAO)

Single use plastics symbol

Single-use plastic products must display the 'plastic in the product' symbol. This applies to items like sanitary towels, tampons, tampon applicators, wet wipes, and other relevant products, marked on either packaging or the product itself.





Wet wipes, i.e. pre-wetted personal care and domestic wipes

Product Documents

Product Information file (PIF)

A complete product information file (PIF) must be available before dispatch of the product. The PIF shall include all the particulars relating to identity, quality, safety for human health and the proof of all effects claimed for the cosmetic product. A cosmetic product safety (CPSR) report is included in the PIF.

Notification and Reporting

Pre-market notification

The EU responsible persons must issue a pre-market notification on the Cosmetic Products Notification Portal (CPNP). This must be done for each cosmetic product, regardless of its type. The responsible person must notify the product to the European Commission and is in charge of the cosmeto-vigilance and of the public access to information according to Art. 21 of the Cosmetic Product Regulation.

4.11 Non-Cosmetic Care

Partners are required to assess additional regulatory requirements for non-cosmetic care products and room fragrance and ensure compliance with such requirements in agreed sales countries.

Non-cosmetic care products that are mixtures, such as shoe care products and room fragrances are subject to the CLP Regulation as well as to general legislation, which applies to all products and packaging (see <u>2.3 Legislative Reference</u>).

Key Chapters and General Requirements for Non-cosmetic Care

- 2. Scope of Operation
- 3. Partner responsibilities
- 4.11 Non-cosmetic care products
- Annex I: Product Restricted Substances List

Due Diligence

Risk Assessment

Business partners are required to assess and comply with all regulatory requirements applicable to mixtures, and ensure that products meet the classification, labelling, and packaging requirements under CLP Regulation before sale or distribution. This is to ensure that any potential risks to health or the environment are clearly communicated to

consumers, workers, and those involved in the handling and transportation of the mixture. Mixtures can consist of solids, liquids, or gases, and they retain the properties of their individual substances.

Labelling

Essential information

- Name, address and telephone number of the supplier(s);
- Nominal quantity of the mixture in the package;
- Trade name or designation of the mixture and
- Identity of all substances in the mixture contributing to the classification
- Where applicable:
 - hazard pictograms
 - signal words
 - hazard statements
 - precautionary statements
 - o supplemental information

Hazard Statements and Pictograms

Hazard pictograms signify particular dangers, along with the appropriate signal word "Danger" or "Warning". Additionally, provide essential safety information. Labelling is performed in accordance with CLP regulation and related guidance.

Examples of warnings



flammable



toxicity



Causes serious eye irritation



skin corrosion or serious eye damage,



under pressure / may explode



allergy or asthma symptoms or breathing difficulties

Prohibited Marketing Claims

Statements such as "non-toxic", "harmless", "environmentally friendly", "ecological", or any other statements indicating the absence of hazardous properties of substances or mixtures, or not consistent with their classification, should not appear on the label of a hazardous substance or mixture.

Notification and Reporting

Safety Data Sheets

Partners must provide a Safety Data Sheet (SDS) for products classified as hazardous under the CLP Regulation, as PBT or vPvB, or listed on the REACH candidate list. The SDS, prepared by a qualified individual, ensures health, safety, and environmental protections, follows a specified format, and must be retained for 10 years after the last product use.

The SDS must be provided free of charge in paper or electronic form for hazardous substances or mixtures upon first delivery and for non-hazardous mixtures on request if certain thresholds are exceeded. Suppliers must update the SDS promptly with new hazard information and share it with previous recipients within 12 months.

Notification to registries

Notification to Poison Centers (PNC) for mixtures and the CLP Inventory for substances is mandatory. Before marketing mixtures, they must be classified and labelled per CLP Regulation, with relevant information recorded in the Poison Centers inventory to ensure compliance and facilitate hazard communication.

If toxicological data meets CLP classification criteria, hazards must be indicated by assigning the mixture to a specific hazard class and category, encompassing physical, health, and environmental risks.

Manufacturers and importers must notify the European Chemical Agency (ECHA) C&L Inventory for substances and submit a Poison Center Notification (PCN) for each country of sale. The PCN must be formatted correctly and include the Unique Formula Identifier (UFI) code. For classification requirements and exemptions, refer to the CLP and REACH Regulations.

Additional Requirements for Scented Candles

Scented candles are subject to the CLP Regulation (EC) No 1272/2008 and standard NF EN 15494 as well as to general legislation, which applies to all products and packaging (see 2.3 Legislative Reference).

Product Testing

In absence of harmonised standards, products must comply with essential requirements. Candles must be tested against EN 15494 and:

- NBN EN 15426:2018 Test relating to the emission of soot from candles
- NBN EN 15493:2019 Fire Safety Test: flame height, combustion test, etc.
- NBN EN 15494:2019 Safety Labels

Instructions for use and warnings

Warnings must comply with EN 15494 in size, shape and content, accompanied by safety symbols in 5 mm minimum height. Note: the supplementary safety information symbols or texts shall be placed below and/or to the right beside the general warning sign. Borders are optional.

- General warning sign
- Never leave a burning candle unattended.
- Keep away from things that can catch fire.
- Keep away from children and pets.

- Use a heat resistance candleholder. Note: not applicable for floating candles.
- Use in a suitable bowl filled with water. Note: For floating candles only.

4.12 Crockery, Cutlery and Kitchenware

Partners are required to assess additional regulatory requirements for crockery, cutlery and kitchenware and ensure compliance with such requirements in agreed sales countries. If a product is intended to come into contact with food, or if it can reasonably be expected to do so, such as crockery, cutlery and kitchenware including food containers, plates, cups, drinking bottles, are subject to food contact material (FCM) legislation as well as to general legislation, which applies to all products and packaging (see 2.3 Legislative Reference).

Key Chapters and General Requirements for Crockery, Cutlery and Kitchenware

- 2. Scope of Operation
- 3. Partner responsibilities
- 4.12 Crockery, Cutlery and Kitchenware
- Annex I: Product Restricted Substances List

Product Testing

Crockery, cutlery and kitchenware encompass a variety of materials, including plastic, ceramic, regenerated cellulose film. Compliance with both chemical limits and migration limits such as for bisphenol A, epoxy derivatives, N-nitrosamines, N-nitrosatable compounds, polyamide, and melamine is essential.

Food contact label

Products must be labelled with the words "for food contact" or a specific indication of its intended use in all languages required, such as "coffee machine," "wine bottle," "soup spoon" or the appropriate symbol.



Additional Labelling and Technical Documentation

Food contact

Labelling, assessment and documentation as per Annex II: CE-Marked Products

- The CE mark affixed by the manufacturer.
- The DoC by the manufacturer or the authorised representative.

Essential labelling information

- Year of manufacture
- Essential maximum/minimum allowable limits
- Volume (V) in litres
- Test pressure (PT) in bar and date
- Safety device set pressure in bar
- Intended use
- Filling ratio in L

Fluid group

Instructions for use and warnings

Warnings affixed to the pressure cooker accompanied by instructions for use, drawings, and diagrams to aid understanding. The information must highlight any risks associated with misuse and address specific safety design features.

4.13 Furniture

Partners must assess and ensure compliance with additional regulatory requirements for furniture and ensure compliance with such requirements in agreed sales countries. Furniture items, including chairs, tables, and closets for indoor or outdoor use, are subject to general legislation for all products and packaging (see 2.3 Legislative Reference).

Key Chapters and General Requirements for Furniture

- 2. Scope of Operation
- 3. Partner responsibilities
- 4.13 Furniture
- Annex I: Product Restricted Substances List

Risk Assessment

Different furniture types have specific safety demands:

- Children's furniture is accompanied with proper instructions and warnings
- Outdoor furniture is assessed and tested for stability and durability.

Sales Restrictions

Furniture with electric motors, hydraulic or lever functions, are prohibited.

4.14 Floating leisure articles

Partners must assess and ensure compliance with additional regulatory requirements for floating leisure articles in agreed sales countries. Floating leisure articles for use on and in water, such as inflatable boats for rowing or paddling of near oval shape with or without transom, canoes and kayaks, inflatable boats made from plastic sheets or from reinforced materials, are subject to general legislation, which applies to all products and packaging (see <u>2.3 Legislative Reference</u>).

Key Chapters and General Requirements for Floating leisure articles

- 2. Scope of Operation
- 3. Partner responsibilities
- 4.13 Floating leisure articles for use on and in water
- Annex I: Product Restricted Substances List

Due Diligence

Risk assessments and subsequent testing of floating leisure articles must demonstrate that products comply with the following non-harmonized standards:

- DIN EN ISO 25649-1:"Floating leisure articles for use in and on water Part 1: Classification, materials, general requirements and test methods".
- DIN EN 25649-2"Floating leisure articles for use on and in water Part 2: Consumer information".
- DIN EN 25649-3 "Floating leisure articles for use on and in water Part 3: Additional specific safety requirements and test methods for Class A devices".
- DIN EN 25649-4"Floating leisure articles for use on and in water Part 4: Additional specific safety requirements and test methods for class B devices"
- DIN EN 25649-5"Floating leisure articles for use on and in water Part 5: Additional specific safety requirements and test methods for Class C devices".
- DIN EN 25649-6"Floating leisure articles for use on and in water Part 6: Additional specific safety requirements and test methods for Class D devices".
- DIN EN 25649-7"Floating leisure articles for use on and in the water Part 7: Additional specific safety requirements and test methods for Class E devices"

5. Disclosure

This document comes into effect immediately and is binding for the entire duration of the business relationship between the Partner and Zalando. It ensures that all agreed Partner obligations and Zalando's product standards are met. Changes or additions to this document do not require further written approval.

Zalando SE is responsible for the content of this document. Partners are obliged not to distribute this document to third parties without written consent from Zalando, with the exception of our partners' business partners engaged in the supply chain.

Some links in this manual direct to external websites. These links are provided for convenience and informational purposes only; they do not imply endorsement or approval by Zalando. Zalando assumes no responsibility for the accuracy, legality, or content of external sites or subsequent links. For questions regarding the content, please contact the external site directly.

6. Contacts

Contract-related inquiries

Please contact the responsible Partner Manager at Zalando. Your personal contacts will be happy to assist you with any questions you may have.

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Annex

Annex I: Product Restricted Substances List & Zalando Chemical Policy

The industry is transparent about the fact that advanced chemistry is essential for making fashion and lifestyle items in our wardrobe more creative, colourful, comfortable, durable and affordable. However, it is also anticipated that hazardous chemicals will be selected responsibly to eliminate harm to consumers, environment and workers within the supply chain.

We believe that due to the scale of our fashion platform, we can make a significant contribution and impact by setting stringent standards and collaboratively work on achieving them with our Partners.

To control chemical compliance Zalando established a Product Restricted Substances List (PRSL) which specifies permitted limits of toxic and harmful substances. The PRSL was developed in line with legislative and regulatory requirements set by the EU Commission and by trading territories that Zalando operates within.

There is no way to prove that a product is compliant without it undergoing full testing.

All Zalando Brands and Partners are required to implement a robust chemical management system and due diligence testing to ensure compliance with Zalando Product Restricted Substances List (PRSL) and relevant international standards and legislation.

Restricted Substance	CAS No.	Test method	Regulated or Industry Standard / Limit Value	
Alkylphenols and Alkylphenol Ethoxylates				
Nonylphenol (NP) (mixed isomers), Octylphenol (OP) (mixed isomers), Nonylphenol Ethoxylates (NPEOs), Octylphenol Ethoxylates (OPEOs)	various	Washable textiles: EN ISO 18254-1:2016 Leather: EN ISO 18218-1:2023	Total NP + OP 10 mg/kg; Total all 100 mg/kg	
Arylamines				

o-Aminoazotoluene	97-56-3			
2,4-Diaminoanisole	615-05-4 (39156-41-7)			
2,4-Toluylenediamine	95-80-7			
2,4-Xylidine	95-68-1			
2,6-Xylidine	87-62-7			
2-Amino-4-Nitrotoluene	99-55-8	Textiles:		
2,4,5-Trimethylaniline	137-17-7 (21436-97-5)	EN ISO 14362-1:2017		
p-Cresidine	120-71-8	EN ISO 14362-3:2017		
3,3'-Dimethyl-4,4'-Diaminodiphenylmethane	838-88-0	Leather:	20 mg/kg each	
4,4'-Diaminodiphenylmethane	101-77-9	EN ISO 17234-1:2020 EN ISO 17234-2:2011		
4,4'-Methylene-Bis-(2-Chloroaniline)	101-14-4			
4,4'-Oxydianiline	101-80-4			
4,4'-Thiodianiline	139-65-1			
4-Aminoazobenzene	60-09-3			
4-Aminodiphenyl	92-67-1			
4-Chloro-O-Toluidine	95-69-2 (3165-93-3)			
Benzidine	92-87-5	Textiles:		
2-Naphthylamine	91-59-8 (553-00-4)	EN ISO 14362-1:2017		
p-Chloroaniline	106-47-8	EN ISO 14362-3:2017		
3,3'-Dichlorobenzidine	91-94-1	Leather:	20 mg/kg each	
3,3'-Dimethoxybenzidine	119-90-4	EN ISO 17234-1:2020 EN ISO 17234-2:2011		
3,3'-Dimethylbenzidine	119-93-7	EN 150 17254-2:2011		
o-Anisidine	90-04-0			
o-Toluidine	95-53-4			
Aniline	62-53-3	Toys: Textiles: EN ISO 14362-1:2017 EN ISO 14362-3:2017 Leather: EN ISO 17234-1:2020 EN ISO 17234-2:2011	30 mg/kg after reductive cleavage in textile toy material, leather toy material and in finger paints 10 mg/kg as free aniline in finger paints	
		Finger Paints:		
Riggidge Dimethyl Fumerate		EN 71-7:2014+A3:2020		
Biocides - Dimethyl Fumarate				
Dimethyl Fumarate (DMFu)	624-49-7	Textile: EN 17130:2019 Other materials: EN ISO 16186:2021	0.1 mg/kg	
Biocides - Tin Organic Compounds				
Dibutyltin (DBT) compounds	1002-53-5 683-18-1	Taytila: CEN ISO/TS 16170:0010 av		
Dioctyltin (DOT) compounds	15231-44-4 15571-58-1	Textile: CEN ISO/TS 16179:2012 or EN ISO 22744-1:2020	1000 mg/kg by weight of tin	
Tributyltin (TBT) compounds	36643-28-4 56-35-9	Footwear, Leather, Plastic: CEN ISO/ TS 16179:2012		
Triphenyltin (TPhT) compounds	668-34-8			

Biocides - Preservatives			
2-Octylisothiazol-3(2H)-on	26530-20-1		250 mg/kg
2-Phenylphenol	90-43-7		1000 mg/kg leather 100 mg/kg other
2-(Thiocyanomethylthio)-Benzothiazole	21564-17-0	EN ISO 13365-1:2020	500 mg/kg
Triclosan	3380-34-5	-	50 mg/kg
4-Chlor-3-Methylphenol (CMK)	59-50-7	-	600 mg/kg leather
various See POP Regulation (EU) 2019/1021 Switzerland Chemical Risk Reduction (SR 814.81) BPR (EU) Nr. 528/2012 for a complete list.	various	Chromatographic Methods and/or Methods US EPA 8081A, US EPA 8081B and US EPA 8151A	forbidden
Bisphenols			
Bisphenol A (BPA)	80-05-7	Toys: EN 71-9:2005+A1:2007 Test methods: EN 71-10/11	0.04 mg/L
D. J. J. G. (2000)		Leather: EN ISO 11936:2023	1 mg/kg
Bisphenol S (BPS)	80-09-1	All other materials: Extraction: 1 g sample/20 ml THF,	
Bisphenol F (BPF)	620-92-8	sonication for 60 minutes at 60°C, then add methanol or acetonitrile for	For information only
Bisphenol AF (BPAF)	1478-61-1	precipitation prior to analysis with LC/MS analysis with LC/MS	
Bisphenol B (BPB)	77-40-7		
Carcinogenic and Disperse Dyestuff	2475-46-9		
Disperse Blue 3 Disperse Blue 7	3179-90-6	_	
Disperse Blue 26	3860-63-7	-	
Disperse Blue 35	56524-77-7 56524-76-6	-	
Disperse Blue 102	12222-97-8	-	
Disperse Blue 106	12223-01-7	-	
Disperse Blue 124	61951-51-7	Textile:	50 mg/kg each
Disperse Red 1	2872-52-8	DIN 54231:2022-09	
Disperse Red 151	61968-47-6		
Disperse Red 11	2872-48-2	-	
Disperse Red 17	3179-89-3		
Disperse Yellow 1	119-15-3		
Disperse Yellow 9	6373-73-5		
Disperse Yellow 39	12236-29-2		
Disperse Yellow 49	54824-37-2		
Acid Red 26	3761-53-3		
Basic Violet 14	632-99-5		
Direct Black 38	1937-37-7		
Direct Blue 6	2602-46-2		
Direct Red 28	573-58-0		
Direct Brown 95	16071-86-6	Textile:	50 mg/kg each
Disperse Orange 11	82-28-0	DIN 54231:2022-09	55g/ng odon

Disperse Orange 149	85316-74-9		
Disperse Yellow 3	2832-40-8		
Disperse Yellow 7	6300-37-4		
Disperse Yellow 23	6250-23-3		
Disperse Yellow 56	54077-16-6		
Acid Violet 49	1694-09-3		
Basic Blue 26	2580-56-5		
Basic Green 4	569-64-2 2437 -29-8 10309-95-2		
Basic Violet 1	8004-87-3		
Solvent Blue 4	6786-83-0		
Solvent Violet 8	52080-58-7 561-41-1		
Solvent Yellow 2	60-11-7	Textile:	50 mg/kg each
Solvent Yellow 14	842-07-9	DIN 54231:2022-09	
Blue colorant	118685-33-9		
Disperse Orange 37/76/59	13301-61-6 12223-33-5 51811-42-8		
Disperse Brown 1	23355-64-8		
Disperse Orange 1	2581-69-3		
Disperse Orange 3	730-40-5	1	
Basic Red 9	569-61-9		
Disperse Blue 1	2475-45-8	-	
Basic Violet 3	548-62-9	-	
Chlorinated Paraffins			
Short Chained Chlorinated Paraffins SCCPs (C10-C13)	85535-84-8	Leather: EN ISO 18219-1:2021 Other materials: EN ISO 22818:2021	1000 mg/kg
Medium Chained Chlorinated Paraffins MCCPs (C14-C17)	85535-85-9	Leather: EN ISO 18219-2:2021 Other materials: EN ISO 22818:2021	1000 mg/kg
Chlorophenols (Biocides)	·		
2,3,4,5-Tetrachlorophenol (TeCP)	4901-51-3		
2,3,4,6-Tetrachlorophenol (TeCP)	58-90-2		
2,3,5,6-Tetrachlorophenol (TeCP)	935-95-5	All materials: EN 17134-2:2023	0.5 mg/kg each
Pentachlorophenol (PCP)	87-86-5		
Flame Retardants			
Octabromodiphenyl ether (OctaBDE)	32536-52-0	EN ISO 17881-1:2016,	1000 mg/kg
Heptabromodiphenyl ether (HeptaBDE)	68928-80-3	EN ISO 17881-2:2016	
Hexabromodiphenyl ether (HexaBDE)	36483-60-0	RoHS:	
Pentabromodiphenyl ether (PentaBDE)	32534-81-9	EN 62321	500 mg/kg (total)
Tetrabromodiphenyl ether (TetraBDE)	40088-47-9	Toys:	
Decabromodiphenyl ether (DecaBDE)	1163-19-5	EN 71-9:2005+A1:2007	
Polybromobiphenyls (PBB)	59536-65-1	EN ISO 17881-1:2016, EN ISO 17881-2:2016-09	10 mg/kg Toys: prohibited 1000 mg/kg for electric and electronic devices (RoHS)
Tris-(2,3-dibromopropyl)- phosphate (TRIS) / (TDBPP)	126-72-7	RoHS:	10 mg/kg Toys: prohibited

Tris-(aziridinyl)-phosphine oxide (TEPA)	545-55-1	EN 62321	
Hexabromocyclododecane (HBCDD / HBCD)	various		LIDODD 400 //
Polybrominated Diphenyl esthers (PBDE)	various	Toys: EN 71-9:2005+A1:2007	HBCDD: 100 mg/kg 1000 mg/kg for electric and electronic devices (RoHS)
Tris (2-chloroisopropyl) phosphate	13674-84-5		
Tris(1,3-dichloropropan-2-yl) phosphate	13674-87-8	EN 71-9:2005+A1:2007	5 mg/kg for each (content limit)
Tris(2-chloroethyl) phosphate	115-96-8		
Fluorinated Greenhouse Gases		<u>'</u>	'
various		Sample preparation: Purge and trap —	
See Regulation (EU) 2024/573 for a complete list.	various	thermal desorption or SPME Measurement: GC/MS	0.1 mg/kg
Formaldehyde			
			< 3 years old: 16 mg/kg
		Leather: EN ISO 17226-1:2021	Children and adults: 75 mg/kg
		Textile: EN ISO 14184-1:2011	Toys intended for use by children under 36 months or in other toys
Formaldehyde	50-00-0	Toys: Standards as listed in Toy Safety Directive 2009/48/EC,	intended to be placed in mouth:1.5 mg/L (migration limit)
		Appendix C Wood: EN 717-1:2004	Resin-bonded wood toy material: 0.1 ml/m3
		Water-based EDQM method	Water-based toy material: 10
		Paper: EN 645:1993 & EN 1541:2001	mg/kg
			Textile, leather and paper toy material: 30 mg/kg
Heavy Metals		<u>'</u>	<u>'</u>
Cadmium (Cd)	7440-43-9 various	Leather: EN ISO 17072-2:2022 Others: EN 16711-1:2015 RoHS: EN 62321	Plastics, jewellery, toys, electric and electronic devices (RoHS): 100 mg/kg Others: 100 mg/kg
Chromium (VI)	18540-29-9	Leather: EN ISO 17075-2:2017 Ageing test: ISO 10195:2018 Method A2 Toys: EN 71-3:2019 + A1: 2021	Leather: 3 mg/kg Toys: max. 0.053 mg/kg for Category III
		RoHS: EN 62321	Electric and electronic devices (RoHS): 1000 mg/kg
		Leather: EN ISO 17072-2:2019	100 mg/kg
		RoHS: EN 62321	1000 mg/kg for electric and electronic devices (RoHS)
Lead (Pb)	7439-92-1	Others: EN 16711-1:2015	
		Footwear: DIN EN 14602:2012	
		Migration EN 16711-3 2019	0.05 micrograms/cm2/hour
Mercury	7439-97-6	Leather: EN ISO 17072-2:2019	10 mg/kg

		Other: EN 16711-1:2015	1000 mg/kg for electric and electronic devices (RoHS)	
		RoHS: EN 62321		
Nickel (Ni) Release	7440-02-0	EN 1811:2023 (non-coated) EN 12472:2020 (coated items) Sunglasses: EN 16128:2015	< 0.5µg/cm²/week non-pierced components < 0.2µg/cm²/week pierced components	
Heavy Metals (extractable)				
Arsenic and arsenic compounds	7440-38-2 various	Textiles:		
Cadmium and cadmium compounds	7440-43-9 various	EN 16711-2:2015 Leather:	Materials with skin contact 1 mg/kg	
Lead and lead compounds	7439-92-1 various	EN ISO 17072-1:2019	(expressed as As/Cd/Pb/Cr(VI) metal that can be extracted from the material)	
Chromium (VI) compounds	18540-29-9 various	EN 16711-2:2015 with EN ISO 17075-2:2017 if Cr is detected	are material)	
Nickel			Nickel compounds in individual concentration greater than 125 mg/kg w/w in textile and 25 mg/kg in leather, hides and furs	
Organochlorine Compounds				
Pentachlorobenzene	608-93-5			
Hexachlorobenzene	118-74-1			
Polychlorinated naphthalenes	70776-03-3			
4-Chlorobenzotrichloride	5216-25-1	All materials: EN 17137:2018	1 mg/kg	
Benzo trichloride	98-07-7			
Benzyl chloride	100-44-7			
Ozone-depleting Substances	ı	I	I	
See Regulation EU 2024/590 for a complete list.	various	GC/MS headspace 120°C for 45 minutes	5 mg/kg	
Perfluororganic Compounds	ı	I.	1	
Perfluorooctanesulfonic Acid and PFOS-related substances (PFOS)	various		1 µg/m²	
Perfluorooctanoic Acid (PFOA) and PFOA and its salts	various	All materials: EN ISO 23702-1:2023 or EN 17681-1:2022 & EN 17681-2:2022	25 ppb	
PFOA-related substances	various	3 211 11 301 212022	1000 ppb	
C9-C14 Perfluorocarboxylic acids (PFCAs) and their salts	various		C9-C14 PFCAs and their salts Σ < 25 ppb	
C9-C14 PFCA-related substances	various		C9-C14 PFCA-related substances Σ < 260 ppb	
Perfluorohexane-1-sulphonic acid (PFHxS) and its salts	various		25 ppb total	
PFHxS-related substances	various	All materials: EN ISO 23702-1:2023 or EN 17681-1:2022 & EN 17681-2:2022	1000 ppb total	
Phthalate Esters				
Dibutylphthalate (DBP)	84-74-2	RoHS:	4 Phthalates Σ = 1000 mg/kg	
Benzylbutylphthalate (BBP)	85-68-7	EN 62321-8	RoHS: 0.1% by weight (each)	

Diethylhexylphthalate (DEHP)	117-81-7	Textile:	
Diisobutylphthalate (DIBP)	84-69-5	EN ISO 14389:2022	
Diisodecylphthalate (DIDP)	26761-40-0	Footwear:	Children <14 years old
Di-n-octylphthalate (DINP) Di-n-octylphthalate (DNOP)	28553-12-0 117-84-0	EN ISO 16181-1:2021 & EN ISO 16181-2:2021	3 Phthalates Σ = 1000 mg/kg
1,2-Benzenedicarboxylic acid, di-C6-8-branched alkyl esters, C7-rich (DIHP)	71888-89-6	Leather and Plastic: Chromatographic	
Bis-(2-methoxyethyl)-phthalate (BMEP)	117-82-8	Methods	9 Phthalates $\Sigma = 1000 \text{ mg/kg}$
Diisopentylphthalate (DiPP)	605-50-5		(DEHP, DBP, BBP, DIBP, DIHP, BMEP, DIPP, DPP, DnHP)
Dipentylphthalate	131-18-0		(Apparel and Footwear)
Di-n-hexylphthalate (DHP) (DnHP)	84-75-3	-	
Plasticizers	04 70 0		
Triphenyl phosphate	115-86-6		
	113-00-0	Toys:	
Tri-o-cresyl phosphate	78-30-8, mixed isomers	EN 71-9:2005+A1:2007	0.03 mg/L
Tri-m-cresyl phosphate	1330-78-5	Test methods: EN71-10/11	
Tri-p-cresyl phosphate			
Polycyclic Aromatic Hydrocarbons (PAHs)			
Benzo[j]fluoranthene	205-82-3	_	
Benzo[e]pyrene	192-97-2		
Dibenzo[a,h]anthracene	53-70-3	Plastic: AfPS GS 2019:01 PAK, (GC/MS analysis)	Adults:
Benzo[a]pyrene	50-32-8		1 mg/kg each
Benzo[k]fluoranthene	207-08-9	Textiles:	Childcare articles, Toys:
Benzo[b]fluoranthene	205-99-2	EN 17132:2019	0.5mg/kg each
Chrysene	218-01-9		
Benzo[a]anthracene	56-55-3		
Naphthalene	91-20-3		10 mg/kg
Acenaphthylene	208-96-8		
Acenaphthene	83-32-9		
Fluorene	86-73-7		
Phenanthrene	85-01-8		
Anthracene	120-12-7	Plastic:	Σ 10 mg/kg
Fluoranthene	206-44-0	AfPS GS 2019:01 PAK, (GC/MS	
Pyrene	129-00-0	analysis)	
Benzo[g,h,i]perylene	191-24-2	Textiles: EN 17132:2019	
Indeno[1,2,3-cd]pyrene	193-39-5	1	
Quinoline			
Quinoline	91-22-5	DIN 54231:2022	50 mg/kg
Volatile Organic Compounds (VOCs) and Solver	its		
1,2-Dichloroethane	107-06-2		10 mg/kg
2-Phenyl-2-Propanol	617-94-7	-	50 mg/kg
Ethyl benzene	100-41-4		Toys: 1 mg/L
Acetophenone	98-86-2		50 mg/kg
Benzene	71-43-2	-	1 mg/kg (including toys)
Styrene	100-42-5	-	30 mg/kg Toys: 0.75 mg/L
Formamida	75-12-7	Headspace-GC-MS (120°C/45 min)	-
Formamide	10-12-1	i leauspace-GO-IVIS (120°C/45 MIN)	200 mg/kg

Cyclohexanone	108-94-1		50 mg/kg	
2-Butanone (MEK)	78-93-3		Toys: 46 mg/L	
Phenol	108-95-2		100 mg/kg Toys: 5 mg/kg (migration limit)	
Tetrachloroethylene	127-18-4		50 mg/kg	
Toluene	108-88-3		10 mg/kg Toys: 2 mg/L	
Trichloroethylene	79-01-6		50 mg/kg Toys: 0.02 mg/L	
Xylene	1330-20-7	Headspace-GC-MS (120°C/45 min)	30 mg/kg Toys: 2 mg/L (total all isomers)	
Dimethylformamide (DMFa)	68-12-2	Chromatographic Methods Footwear: EN ISO 16189:2021	1000 mg/kg	
1-Methyl-2-pyrrolidone (NMP)	872-50-4	EN 100 40400 0004	1000 #	
N,N-Dimethylacetamide (DMAC)	127-19-5	EN ISO 16189:2021	1000 mg/kg	
Dichloromethane	75-09-2	Toys:	0.06 mg/L	
Methanol	67-56-1	EN 71-9:2005+A1:2007	5 mg/L	
Nitrobenzene	98-95-3	Test methods: EN71-10/11	0.02 mg/L	
Various				
Acrylamide	79-06-1	Toys: EN 71-9:2005+A1:2007 Test methods: EN71-10/11	0.02 mg/L	
pH value	none	Non-Leather:EN ISO 3071:2020 Leather: EN ISO 4045:2018	Textiles: Apparel: 4.0 - 7.5 Footwear: 4.0 - 7.5 Accessories: 4 - 8.5 Leather: Footwear & Accessories < 3 years 3.5 - 7.0 Footwear & Accessories > 3 years: 3.2 - 7.0	

Product packaging

All product packaging as defined as such by the EU Packaging and Packaging Waste Directive shall comply with Zalando Restricted Substance List as outlined before. Below matrix shall provide a guide on potentially relevant scope.

		wide spread use					
			deliberate use/ def	tected occasionally	,		
			low chan	ice of use			
			use not fo	reseeable			
Substance name	Wood & Paper	Wood & Paper Plastic & Wraps Dyes, Inks & Metal Textiles Othe Coatings					
Alkylphenol (AP) and Alkylphenol Ethoxylates (APEOs), including all isomers						foams	
Bisphenol A							
Butylhydroxytoluene (BHT)		Poly bags					
Dimethylfumarate (DMFu)						Silica gel packets & foam	
Formaldehyde							
Heavy Metals							
Tin Organic Compounds							

Perfluorinated and Polyfluorinated	waterproof finish	waterproof finish	waterproof finish	
Chemicals (PFCs)				
Phthalates		Plastisol prints		
Pesticides				
Azo-amines				

Migration limit from toy items

Category I: Compressed paint tablets, materials intended to leave a trace or similar materials in solid form appearing as such in a toy (e.g. the cores of colouring pencils, chalk, crayons); Pliable modelling materials, including modelling clays and plaster.

Category II: Liquid paints, including finger paints, varnishes, lacquers, liquid ink in pens and similar materials in liquid form appearing as such in the toy (e.g. slimes, bubble solution); Glue sticks.

Category III: Coatings of paints, varnishes, lacquers, printing inks, polymers, foams and similar coatings; Polymeric and similar materials, including laminates, whenever textile reinforced or not, but excluding other textiles; Paper and paper board; natural or synthetic textiles; Glass, ceramic, metallic materials; Other materials whether mass coloured or not (e.g. wood, fibre board, hard board, bone and leather).

Zalando strongly encourages all Brands and Partners to exceed requirements set in RSL and to promote best practices and continuous improvement. Zalando commits to provide you with support and guidance in exchange for transparency.

Chemical	Category I [mg/kg]	Category II [mg/kg]	Category III [mg/kg]	Testing method
Aluminium	2 250	560	28 130	
Antimony	45	11.3	560	
Arsenic	3.8	0.9	47	
Barium	1 500	375	18 750	
Boron	1 200	300	15 000	
Cadmium	1.3	0.3	17	
Chromium (III)	37.5	9.4	460	
Chromium (VI)	0.02	0.005	0.053	
Cobalt	10.5	2.6	130	According to
Copper	622.5	156	7 700	EN 71-3:2019 + A1:
Lead	2.0	0.5	23	2021
Manganese	1 200	300	15 000	
Mercury	7.5	1.9	94	
Nickel	75	18.8	930	
Selenium	37.5	9.4	460	
Strontium	4 500	1 125	56 000	
Tin	15 000	3 750	180 000	
Organic tin	0.9	0.2	12	
Zinc	3 750	938	46 000	

Annex II: CE-Marked Products

Partners are required to assess additional regulatory requirements for CE marked products and ensure compliance with such requirements in agreed sales markets.

Conformity Assessment: Products required to be affixed with a CE marking, undergo Conformity assessment, assessed by the products manufacturer. Its assessment needs to demonstrate that it meets all legislative requirements of applicable product legislation. Zalando recommends referring to ISO/IEC 17050-1:2004 - Conformity assessment in addition to applicable EU product legislation.



Declaration of conformity (DoC): As part of conformity assessment, the manufacturer or the authorised representative must draw up the DoC. The Declaration may follow a standard format provided in Annex III of Decision No 768/2008/EC and must be translated into English:

'EU DECLARATION OF CONFORMITY'

- 1. No ... (unique identification of the product)
- 2. Name and address of the manufacturer or his authorised representative:
- 3. This declaration of conformity is issued under the sole responsibility of the manufacturer (or installer):
- 4. Object of the declaration (identification of product allowing traceability. It may include a colour image of sufficient clarity to enable the identification of the product, where appropriate.)
- 5. The object of the declaration described in point 4 is in conformity with the relevant Union harmonisation legislation:
- 6. References to the relevant harmonised standards used, or references to the specifications in relation to which conformity is declared:
- 7. Where applicable: the notified body ... (name, number)... performed ... (description of intervention)... and issued the certificate:
- 8. Additional information: Signed for and on behalf of: (place and date of issue) (name, function)(signature)

User Instructions

The results of the risk assessment should be reflected in the technical documentation and also in the manufacturer's instructions and information so the user is able to estimate the risk reduction when using the product (in a quantitative or qualitative manner) under the foreseeable conditions of use.

CE mark

The CE marking is a certification mark that indicates conformity with health, safety, and environmental protection standards for products. By affixing the CE marking to a product, a manufacturer declares that the product meets all the legal requirements for CE marking and can be placed in the EEA, UK and CH. The marking must be placed visibly and legibly on the product or, if not possible due to the nature or size of the product, must be affixed to the packaging and the accompanying document. Vertical dimension may not be less than 5 mm.

UKCA marking: The UK government (UK/ Great Britain: England, Wales and Scotland) extended the recognition of goods that meet EU requirements (including CE marking), indefinitely beyond 31 December 2024 for many products.

Annex III: Guidelines to Classification of Product Failures

Definition of Critical, Major and Minor faults from inbound deliveries that are subject to warehouse quality inspections based on Industry Standard Acceptable Quality Level (AQL).

Critical Defects

Critical defects – highly significant and potentially dangerous defects which would render the product unusable or could cause harm/injure the consumer or someone in the immediate environment of the product. e.g. mould, sharp objects, insects, mouse droppings, incomplete/ misleading/wrong labelling.

Critical defects found during an audit, at the customer side or at inbound can trigger a complete inventory check of a product or delivery. If it is the case that the inventory check cannot be conducted by our internal inspectors as the defect could endanger health, Zalando reserves the right to quarantine the whole stock and return the whole delivery, at the Partners' costs.

Major Defects

Major Defects – significant defects that adversely affect the product performance or visual appeal. If present, would highly likely lead to a return/complaint from the consumer and would result in product failure or discount (e.g. dirt spots in front of strong visible areas, broken or missing components, dysfunctional closures, etc.).

Minor Defects

Minor Defects – small, typically insignificant issues, not affecting the functionality or visual appeal of the product but is nevertheless a defect beyond defined quality standard. If evident, would most likely not lead to a return/complaint from the consumer (e.g. untrimmed thread, small dirt spots inside or on outsole).

Annex IV: Testing of children's products

Product Type	Standard	Purpose
	CEN/TR 16792	Safety of children's clothing - Recommendations for the design and manufacture of children's clothing. Mechanical safety
	EN 14682	Safety of children's clothing - Cords and drawstrings on children's clothing specification.
Kids Apparel and Accessories	EN 17394-2	Textiles and textile products. Safety of children's clothing. Security of attachment of buttons. Test method

Dressing Up Costumes	CEN/TS 17394-3	Textiles and textile products. Safety of children's clothing. Security of attachment of metal mechanically applied press fasteners. Test method
	CEN/TS 17394-4	Textiles and textile products Safety of children's clothing. Security of attachment of components except buttons and metal mechanically applied press fasteners. Test method
	EN 16732	Slide fasteners (zips). Specification
	EN71-1 EN71-2 EN71-3	Safety of toys - Mechanical and physical properties. Flammability - for toys to be worn and costumes intended to be worn by children in play. Specification for migration of certain elements. Can also be referred to in the absence of relevant standards.
	16 CFR Part 1610	Standard for flammability of clothing textiles.
Nightwear Including: Bathrobes Dressing gowns Nightshirts Nightdresses Pyjamas	EN 14878 BS 5722	Textiles - burning behaviour of Children's Nightwear - Specification. Nightwear categories classified
Footwear intended for children or with child appealing features and play value (e.g. novelty slipper)	EN 71-1 (8.3) EN 71-1 (8.4) EN 71-1 (8.11 & 8.12)	Detachment of small parts – torque. Detachment of small parts - tensile test. Sharp/ pointy edges.

Annex V: Testing of Infant and Toddler Products

Product Type	Standards	Purpose
Childcare products and carriers including but not limited to: Sleeping bags Dummy chains Bibs	CEN/TR 13387 NF D60-300-1	Childcare articles. General safety guidelines Furniture for children. General safety requirements
	EN 16781	Textile childcare articles Safety requirements and test methods for children's sleep bags for use in a cot
Transport related Childcare products	EN 13209-1 EN 13209-2 EN 14344 EN 15918 CEN/TR 16512 EN 1466 EN1888	Framed baby carriers Soft baby carriers Childcare seats for cycles Bicycle trailers Children's slings guidelines Carry cots and stands Wheeled child conveyances
Sleeping related childcare products	EN 16890 EN 16779 EN16780 EN 16781 EN12790 EN 716 NF D60-300-4 BS 8509	Mattress for cots and cribs Children cot duvets Children cot bumpers Children's sleep bags Reclined cradles Children's cots and folding cots Toddler beds Children's beds

	BS 7972 BS 18700	Children's bed guards Mattresses for moses baskets, permbulators, carrycots and similar domestic articles
Sitting related childcare products	EN 1272 EN 16120 EN 16232 EN 14988 EN 17191	Table mounted chairs Booster seats Infant swings Children's high chairs Seating for children
Cleaning and hygiene related childcare products	EN 12221-1 & 2 EN 17022	Changing units Bathing aids
Early learning related childcare products	EN 1273 EN14036	Baby walking frames Baby bouncers
Physical protection related childcare products	EN 13210	Harness and reins
Feeding and accessories related childcare products	EN 1400 EN 12586 EN 14350 EN 14372 EN 12868	Soothers Soother holders Drinking equipment Cutlery and feeding utensils Release of N-nitrosamines and N-nitrosatable substances

Annex VI: Mandatory Onboarding Conditions for new Partners

Completion of onboarding questionnaires and in particular instance registration to external service providers commissioned by Zalando is obligatory for exchanging technical documents and enable Zalando assessing the Partner's status of compliance with <u>3. Partner responsibilities.</u>

In addition to the obligation of submitting test reports and specified by Zalando additional documentation each non EEA Partner is obliged to submit an artwork/image of a compliant product label in accordance with chapter 3.2 Product Labelling and consumer information via email. Both steps are mandatory for a successful confirmation of your onboarding.

As a next step Zalando will require, based on an internal risk assessment, test reports (chemical/physical/risk assessment related evidence) and a picture showing the product and compliant product label according to chapter <u>3.2 Product Labelling and consumer information</u> prior to delivery.

This documentation has to be provided for a specific share of ongoing seasons and nomination for styles to be tested will be specified by Zalando after successful confirmation of your onboarding.

Despite Zalando requesting only a certain % of test reports each Partner is obliged to have them ready for all products offered at Zalando during ongoing business relationships.

Partners can choose to submit already existing test reports via Product Approval form (PAF) or to order tests via our e-Test Request Form (TRF). A picture of the product with a

compliant labelling must be submitted via PAF. Both processes are exhaustively described in User Guides that are uploaded onto our portal.

Test reports must be clearly linked to products supplied by Zalando and an example picture of the product with a compliant labelling must be submitted prior to delivery. No products will be accepted and placed online until the requested documents for nominated styles are received and approved by Zalando prior to shipment.

The costs associated with testing are to be borne by the partner.

Detailed information on how to register and use the portal will be provided to each partner at the onboarding stage. In case of multiple testing failures Zalando reserve the right to:

- Increase % share of test reports required for submission,
- Terminate business relationships with repetitive offenders.

Annex VII: Upcoming legislative requirements

Legislation undergoes frequent updates, which we have compiled below for your reference. The upcoming legislative requirements in this Annex and associated legal requirements are not comprehensive.

PFHxA restriction

To protect human health and the environment by restricting the use of undecafluorohexanoic acid ('PFHxA') and PFHxA -related substances. The restriction will ban the sale and use of PFHxA in consumer textiles, such as rain jackets; food packaging; consumer mixtures such as waterproofing sprays; cosmetics like skin care products.

General Product Safety (GPSR) Regulation (EU 2023/988)

Effective from 13 December 2024, it modernises the product safety framework, with new obligations for online marketplaces and enhanced requirements for product documentation and safety procedures.

Deforestation-free Products (EUDR) Regulation (EU) 2023/1115

Effective from 30 December 2024, it mandates deforestation-free supply chains, particularly targeting commodities

like palm oil, soy, and other high-risk products.

Artificial Intelligence Acts Regulation (EU) 2024/1689

Effective from 2 February 2025 (phase 1) and 2 August 2026 (phase 2), it establishes regulatory oversight for Al systems, with a focus on ensuring product safety and risk management.

Packaging Regulation proposal

Expected in 2025, it will replace the current Packaging and Packaging Waste Directive 94/62/EC, introducing stricter rules to reduce packaging waste and improve recycling rates.

Toys Safety Regulation draft Repealing Directive 2009/48/EC

Expected in 2025, it strengthens rules on chemical and mechanical hazards, while aligning with the Digital Product Passport requirements for improved product transparency.

Registration, Evaluation, Authorisation and Restriction of chemicals (REACH) - Amendment of Regulation (EC) No 1907/2006 - Revision

Expected in 2025, it tightens restrictions on hazardous chemicals, including PFAS and endocrine disruptors, in line with the EU Chemicals Strategy for Sustainability (CSS).

Directive on the liability for defective products - proposal COM(2022) 495 final

Expected in 2025, it updates liability rules for digital goods and Al-powered products, replacing the existing Product Liability Directive 85/374/EEC.

Persistent Organic Pollutants (POPs) -Amendments of Regulation (EU) 2019/1021

Expected in 2025, it introduces stricter controls on POPs, including PFOS, brominated flame retardants, and SCCPs, to reduce environmental contamination.

Classification, Labelling, and Packaging (CLP) - Regulation (EC) No 1272/2008

Expected in 2025, it introduces new hazard classes, with a focus on enhancing hazard communication and addressing endocrine disruptors.

Ecodesign for Sustainable Products Regulation (EU) 2024/1781

Expected in 2025 (phase 1), it introduces the Digital Product Passport (DPP) to improve transparency regarding the sustainability of textiles, footwear, furniture, household appliances, and other product categories, excluding food, feed, and medical products

Regulation (EU) 2024/197 on Harmonised classification and labelling of certain substances with regard to the European Cosmetic Regulation 1223/2009

Expected in the 3rd quarter of 2025, it incorporates classification, labelling and packaging of substances and mixtures.

Regulation (EU) 2024/1328 as regards octamethylcyclotetrasiloxane (D4), decamethylcyclopentasiloxane (D5) and dodecamethylcyclohexasiloxane (D6) amending REACH

Cyclopentasiloxane (D5), in leave-on products: max 0.1% from June 6th, 2027; Cyclohexasiloxane (D6), in wash-off products: max 0.1% from June 6th 2026, in leave-on products: max 0.1% from June 6th, 2027

Regulation (EU) 2023/2055 amending REACH

Effective from October 17 2023 and in transition, it introduces significant restrictions on the use of microplastics and aims to limit the intentional addition of synthetic polymer microparticles, such as microplastics, in a wide range of products such as cosmetics, fragrances and detergents, toys, polishes, and even glitter in soap

Regulation (EU) 2022/2195 amending Regulation (EC) No 1223/2009

Effective from 10 November 2022, it restricts Butylated Hydroxytoluene and Acid Yellow 3 for placing on the market and from January from July 1 2023, and for making available on the market from January 1, 2024. Homosalate is restricted from January 1, 2025 for placing on the market, and as of July 1, 2025, for making available on the market. Piperazine in bulk and nano forms is permitted as a UV filter as of November 31, 2022.

Regulation (EU) 2023/1545 amending Regulation (EC) No 1223/2009

Effective from 16 August 2023, it expands the list of fragrance allergens in cosmetic products for 56 fragrance ingredients.

Regulation (EU) Regulation (EU) 2024/996 amending Cosmetics Regulation (EC) No 1223/2009

Effective from April 3, 2024, it introduces specific restrictions on Vitamin A, alpha-Arbutin, Arbutin, and certain endocrine-disrupting substances starting from December 2024.

Rolling List of (groups of) substances for restriction updating Annex I to the Restrictions Roadmap under the Chemicals Strategy for Sustainability SWD(2022) 128

Revised version 1 July 2024 under https://ec.europa.eu/docsroom/documents/60674

Regulation (EU) 2023/1542 on batteries and waste batteries, amending Directive 2008/98/EC and Regulation (EU) 2019/1020 and repealing Directive 2006/66/EC

It introduces new sustainability, carbon footprint, and recycling requirements for batteries. From August 18, 2025, producers must establish battery collection. treatment, and recycling systems, and label batteries containing Cadmium (Cd) or Lead (Pb) above threshold levels. By August 18, 2026, labels must also include producer information, battery capacity, hazardous substances. From February 18, 2027, batteries must feature a QR code linking to product details and meet removability and replaceability standards for consumer electronics. From August 2028, batteries must meet specific performance and durability standards

Regulation (EU) 2024/858 - on the use of nanomaterials

Styrene/Acrylates copolymer, Sodium Styrene/Acrylates copolymer, Copper, Colloidal Copper, Hydroxyapatite, Gold, Gold Thioethylamino Colloidal Gold. Hyaluronic Acid, Acetyl heptapeptide-9 Colloidal gold, Platinum, Colloidal Platinum, Acetyl tetrapeptide-17 Colloidal Platinum and Colloidal Silver in cosmetics products. Requirement starts with the restriction From 1 February 2025 of products containing the mentioned substances, shall not be placed on the Union market. From 1 November 2025 cosmetic products containing that substance shall not be made available on the Union market

Directive (EU) 2022/2380 on requirements of the 'common charging' solution

The 'common charging' requirements will apply to all handheld mobile phones, tablets, digital cameras, headphones, headsets, portable speakers, handheld videogame consoles, e-readers, earbuds, keyboards, mice, and portable navigation systems as of 28 December 2024. These requirements will also apply to laptops as of 28 April 2026. Such transition periods will give industry sufficient time to adapt before the entry into application. The main elements are as follows.