



## KG ZARA Deutschland B.V. & Co.

### **Complaints Mechanism on the Communication of Human Rights and Environmental Risks and Breaches**

KG ZARA Deutschland B.V. & Co. (hereinafter, the “Company”), as a German company belonging to Inditex Group<sup>1</sup>, is fully committed to respecting, promoting and protecting Human Rights and Environmental related matters across its entire supply. In this regard, it has adopted this Complaints Mechanism on the Communication of human rights and environmental risks and breaches (hereinafter, the “Complaints Mechanism”), formally approved by the Management Board of ZARA Management B.V., in light of the requirements set forth in the German Act on Corporate Due Diligence Obligations in Supply Chains (hereinafter, the “SCDD Act”) that require companies under its scope to provide potentially affected persons an accessible way to report human rights and environmental-related risks as well as breaches of human rights-related and environmental-related obligations under certain conditions provided by the SCDD Act.

The Complaints Mechanism takes advantage of the Ethics Line of Inditex Group, and this document just develops and complements<sup>2</sup> the provisions of the Ethics Line Procedure<sup>3</sup>.

#### **What is the objective scope of the Complaints Mechanism? What type of issues can be reported?**

The Complaints Mechanism is a confidential channel to report human rights and environment-related risks pursuant to Section 2 (2) and (3) of the German SCDD Act as well as breaches of human rights-related or environmental obligations pursuant to section § 2 para. 4 of the German SCDD Act

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<sup>1</sup> The Inditex Group (hereinafter, “Inditex” or the “Group”) includes INDUSTRIA DISEÑO TEXTIL, S.A. (INDITEX, S.A.) and its group companies, being an international retail group headquartered in Spain. Both the Company and Inditex reflect their commitment with respecting, promoting and protecting Human Rights and Environmental related matters across its entire supply chain in both its Code of Conduct and Responsible Practices and the Code of Conduct for Manufacturers and Suppliers of the Company (collectively, the “Codes of Conduct”). Moreover, in 2012 Inditex adopted the Ethics Line, a strictly confidential channel through which all Group employees, manufacturers, suppliers or third parties with direct dealings or legitimate commercial or professional interest may, regardless of their hierarchical level and geographic or functional location, may file concerns, including anonymously regarding, among others, non-compliance with the Group's Codes of Conduct, as well as any other internal rules of conduct within the competence of the Committee of Ethics. The Ethics Line is regulated by the Ethics Line Procedure<sup>1</sup> and it is supervised by the Inditex's Ethics Committee.

<sup>2</sup> In case of conflict or discrepancy between both documents, the Complaints Mechanism provisions shall prevail.

<sup>3</sup> A German translation is available [here](#).



that may have arisen as a result of the Company's activities in its own business areas or within the activities carried out by a direct or indirect supplier of the Company.

This should be understood without prejudice to the objective scope of application of the Ethics Line Procedure of Inditex Group.

### **How may I report through the Complaints Mechanism?**

The Complaints Mechanism may be contacted through any of the following means:

- by email to [ethicsline@inditex.com](mailto:ethicsline@inditex.com) or [canaletico@inditex.com](mailto:canaletico@inditex.com)
- by post to Inditex Committee of Ethics  
Avenida de la Diputación  
Edificio Inditex  
15142 Arteixo  
A Coruña (Spain)

Please indicate in your report if the report is addressed to the Company and/or if you wish the Company to be informed.

See below the section named "Facilitating access to the Complaints Mechanism" for further details about the accessibility to the Complaints Mechanism.

### **What's the difference between the Complaints Mechanism and the Ethics Line Procedure?**

As indicated above, KG ZARA Deutschland B.V. & Co. is a company belonging to the Inditex Group and uses the Inditex Ethics Line as its own Complaints Mechanism specifically for reporting human rights and environmental risks or breaches. Therefore, the only difference between both procedures lies with the scope of application of each one of them. This ensures an informed and adequate handling of your report in accordance with the provisions of the German SCDD Act.

### **How does the handling and investigation of reports work?**

Reports made through the Complaints Mechanism shall be received by Inditex Ethics Committee. Once the report has been received, the rules and provisions set forth in the Inditex Ethics Line Procedure apply, which is available [here](#). A German translation is also available [here](#). In addition, the following rules apply:

**(1) Facilitating access to the Complaints Mechanism**

- Reports can be submitted in all languages. In case the report is not in German, English or Spanish, the Committee of Ethics will prepare a confidential translation of the report. Upon request of the party making the report, the Company will endeavour to communicate in the language of the reporting person.
- If you would like a personal meeting for your reporting, please send via the Complaints Mechanism a message regarding how the Ethics Committee can get in touch with you and a proposal of availability for such personal meeting. Please indicate in which language you would like to have the meeting.
- Reporting through the Complaints Mechanism is absolutely free of charge for reporting persons. However, the Company does not assume any costs or expenses incurred by the reporting person in connection with the use of the Complaints Mechanism; in particular, the Company shall not assume any travel expenses or costs for legal advice.

**(3) Acknowledgement of receipt**

You will receive an acknowledgement of receipt no later than seven days after receipt of the notice, unless the latter is not possible in practice due to the report being made anonymously.

► For further details, see also section 6.1 of the Inditex Ethics Line Procedure.

**(4) Guarantees and protective measures**

4.1. Confidentiality: the Company guarantees the absolute confidentiality of the identity of every reporting person and the party concerned by the report, as well as of the contents and details of the reports received. To this end, the rules of the Inditex Ethics Line Procedure shall be applicable for the reporting of the human rights or environmental risks or breaches falling under the scope of the Complaints Mechanism (§ 2 para. 2 to 4 LkSG).

► For further information on confidentiality, see section 5.1 of the Inditex Ethics Line Procedure.

4.2. Non-retaliation: with regard to the guarantee of non-retaliation, the provisions set forth in the Inditex Ethics Line Procedure shall apply to any person making a report under the scope of the Complaints Mechanism.

4.3. Right to be heard: with regard to the right to be heard, the provisions set forth in the Inditex Ethics Line Procedure shall apply to any person making a report under the scope of the Complaints Mechanism.

4.4. Transparency relating to the use of personal data: with regard to this guarantee, the provisions set forth in the Inditex Ethics Line Procedure shall apply to any person making a report under the scope of the Complaints Mechanism.

**(4) Forwarding to the Human Rights Officer of the Company**

If you indicate in your report on human rights and environment-related risks pursuant to Section 2 (2) and (3) of the German SCDD Act as well as breaches of human rights-related or environmental obligations pursuant to section § 2 para. 4 of the German SCDD Act that the report is addressed to the Company or if you express that you wish the Company to be informed about your report, then the Ethics Committee shall inform immediately the Human Rights Officer of the Company. The same applies if the complaint reported have a direct link to the own operations or the direct suppliers of the Company.

**(5) Handling and investigation of reports**

To ensure an impartial and independent process, the handling and investigation of reports under the Complaints Mechanism shall be conducted by the Inditex Committee of Ethics. Notwithstanding the aforementioned, the Inditex Committee of Ethics may require the assistance of local areas, departments, or functions of the Company, that might be requested to participate in the handling and investigations of the reports related to human rights and environmental-related risks under the scope of the SCDD Act, to ensure the adequate investigation of said reports. In cases mentioned in no.

(4), the Inditex Ethics Committee and the Human Rights Officer of the Company collaborate on the basis of trust and work towards the efficient and effective fulfilment of the legal due diligence obligations of the Company under the SCDD Act.

► For further details, see also section 6 of the Inditex Ethics Line Procedure.

**(6) Discussion of the facts with the reporting person**

The persons entrusted with the management of the report will contact you and discuss the facts you have communicated with you. Please let us know in your communication if you do not wish this.

**(7) Information on the outcome of the procedure**

The Ethics Committee shall inform the reporting person about the outcome of the procedure, always in accordance with the provisions of section 6.1 of the Inditex Ethics Line Procedure.

**(8) Guarantee for impartial action**

The Ethics Committee and, if appropriate, the persons entrusted by the Company with the investigation of the reports are instructed to act impartially. They shall decide independently in the conduct of the management and investigation of the reports and shall not be bound by instructions. They are bound to secrecy.

**(9) Examination of the effectiveness of the Complaints Mechanism**

The Human Rights Officer of the Company reviews the effectiveness of the complaints' procedure at least once per year, as well as on an ad hoc basis if the company has to reckon with a significantly changed or significantly extended risk situation in its own business area or with its direct or indirect suppliers, so that the Company ensures taking the appropriate remedial action to prevent, end or minimise the risk situation.

Hamburg, January 2023

KG ZARA Deutschland B.V. & Co.

Geschäftsführung