

ZIMMERMANN

TRACEABILITY POLICY

POLICY STATEMENT

Supply Chain transparency and traceability of the materials used in our products are a requirement for Zimmermann's supply chain partners and necessary to meet our commitment to the 10 Principles of the UN Global Compact, support the Sustainable Development Goals and ensure compliance with existing and upcoming regulations.

Traceability is defined as the ability to trace each material and process to its origin and process facility across the 4 tiers:

- Tier 1 is the assembly and manufacturing of final product.
- Tier 2 is the production and finishing of materials (e.g., fabric and trims) that go directly into finished product.
- Tier 3 is processing of raw materials into yarn and other intermediate products.
- Tier 4 is the cultivation and extraction of raw materials from the earth, plants or animals.

Zimmermann requires that its suppliers make every reasonable effort to map their own supply chains and share with Zimmermann information pertaining to sourcing and processing locations of materials that are used in Zimmermann's products.

We expect our suppliers to provide traceability information, upon request, for any material used in Zimmermann's products.

If objective reasons prevent traceability of all materials, suppliers should prioritise tracing the main material (any material accounting for 50% or more of the product composition).

Traceability information of Priority Materials (Cotton, Viscose, Wool and Leather) should always be provided for every style, irrespective of their percentage within the product composition.

Zimmermann also requires that no cotton for its products be sourced from Kazakhstan, Tajikistan, Turkmenistan, or Xinjiang.

IMPLEMENTATION

The provision of traceability information for the four Priority Materials is mandatory for every style.

Zimmermann's suppliers using Priority Materials are expected to provide traceability information every season.

Traceability information should include at a minimum: the name of the facility, its address and the process carried out. This should be supported by sufficient evidence which includes but is not limited to, invoices, transport documents, forensic testing results, official certificates (e.g., GOTS transaction certificates) and an affidavit confirming the validity of the information provided. In special cases, Zimmermann can approve a self-declaration of the supplier as sufficient supporting evidence.

Traceability information for any non-priority material will be requested case by case, nonetheless the supplier is expected to have the information and any relevant evidence available to be provided upon request.

To facilitate traceability efforts, Zimmermann has partnered with a digital traceability tool provider. The tool is available to all Zimmermann suppliers at no cost and can be used to upload traceability information and evidence.

REPORTING

As members of the UN Global Compact (UNGC) we have committed to the Ten Principles in the areas of human rights, labour, environment and anti-corruption and are required to report on our progress annually. The document we submit to the UNGC as part of this commitment tracks our progress in the implementation of this policy.

APPENDIX A

Garment Manufacturer Declaration

I, (first and last name) _____ on behalf of (company name) _____, supplier of the garments provided to Zimmermann (Styles _____), certify that such garments were made with (indicate material among the options provided) cotton fabric or yarn / wool fabric or yarn / viscose fabric or yarn / finished leather produced in (country and region/province) _____.

The (indicate material among the options provided) yarn / fabric / leather was purchased from (company name and address) _____ and delivered to (company name and address) _____ for finished garment manufacturing.

Date _____

Signature _____

Accessory Manufacturer Declaration

I, (first and last name) _____ on behalf of (company name) _____, supplier of the accessories provided to Zimmermann (Styles _____), certify that such accessories were made with (indicate material among the options provided) cotton fabric or yarn / wool fabric or yarn / viscose fabric or yarn / finished leather produced in (country and region/province) _____.

The (indicate material among the options provided) yarn / fabric / leather was purchased from (company name and address) _____ and delivered to (company name and address) _____ for finished product manufacturing.

Date _____

Signature _____

Footwear Manufacturer Declaration

I, (first and last name) _____ on behalf of (company name) _____, supplier of the footwear provided to Zimmermann (Styles _____), certify that such footwear was made with (indicate material among the options provided) cotton fabric or yarn / wool fabric or yarn / viscose fabric or yarn / finished leather produced in (country and region/province) _____ .

The (indicate material among the options provided) yarn / fabric / leather was purchased from (company name and address) _____ and delivered to (company name and address) _____ for finished product manufacturing.

Date _____

Signature _____

APPENDIX B

Frequently Asked Questions

I do not supply any product made of cotton, viscose, wool or leather. Do I need to trace the materials I use?

Yes you should be able to trace all materials you use to their origin. However, you are not required to provide evidence of the material origin for every style but need to be prepared to procure the relevant evidence upon Zimmermann's request.

I am a garment supplier and I buy fabrics and/or leather from suppliers nominated by Zimmermann. What evidence should I submit?

For the styles that you have made using fabrics and/or leather purchased from nominated suppliers, you will need to fill in and sign the 'Manufacturer Declaration' and provide the invoices that you have issued to Zimmermann for the relevant styles. Manufacturer declaration templates can be found in Appendix A. There is one template for garments, one for accessories and one for footwear. You will need to choose the template that best represents the product category you have manufactured for Zimmermann.

If you have also made products using fabrics and/or leather that you have sourced from your own suppliers (true FOB), then you will need to provide all required origin information for those materials. Please, refer to the next question for further details.

I am a true FOB supplier and buy materials from own sources. What evidence should I submit?

For fabrics made of cotton, viscose or wool and for leather, you will need to identify each processor of the fibre or the hide as far back the supply chain as possible. Our aim is to identify the location of raw material production (i.e., the country where the cotton was grown, the timber was logged for viscose production, the sheep were shorn for wool and the livestock location for leather).

This means that if you are a garment manufacturer you will need to ask your fabric supplier where they purchased the yarn, then ask the yarn supplier where they purchased the raw material and so on.

Equally for leather, you will need to work with your tanneries to identify your upstream leather supply chain.

We have provided some templates in the appendixes, the 'Declarations', that should help you identify the main supply chain steps and report the information back to us. In addition to the Declarations, you will need to provide supporting evidence that verifies the purchase and delivery of the material you are tracing.

For example, if you wish to prove that company A (fabric supplier) purchased the yarn from company B, you will need to show evidence of their commercial relationship by providing a sales invoice and a transport document confirming delivery of the yarn at company A's facilities. If company A is a trader and did not receive the yarn that was instead shipped to company C, a weaving facility, you may need to prove the commercial relationship between A and C.

We understand that prices are confidential, therefore you can redact any pricing information shown on the documents provided as evidence.

If you do not supply garments made of cotton, wool, viscose or leather you won't need to provide evidence for every style but will be expected to have traceability of the raw materials you use and the ability to provide evidence if required.

I am a fabric supplier, and I don't know who supplies the yarn. What should I do?

In line with this policy, you are required to disclose information pertaining to the origin of the yarn. If in doubt, please, contact the Zimmermann team at sustainability@zimmermann.com to discuss transparency and traceability requirements.

How will you verify the information we provide?

We have implemented a science-based verification system that can identify the origin of raw materials with a laboratory test of the yarn, fabric or the finished product.

The verification will be unannounced and can be expected at any time.

What happens if the laboratory finds cotton from unauthorised locations?

Tests may be carried out at various stages of manufacturing.

If the lab test finds cotton from unauthorised locations in the yarn or greige material, the replacement of the yarn or greige will be at the expense of the fabric supplier (if this was nominated by Zimmermann) or the garment manufacturer if the material was purchased by the manufacturer from own sources.

If the unauthorised cotton is found at a later stage of manufacturing, the supplier could be asked to bear the cost of make, finished goods and/or landed cost of goods.