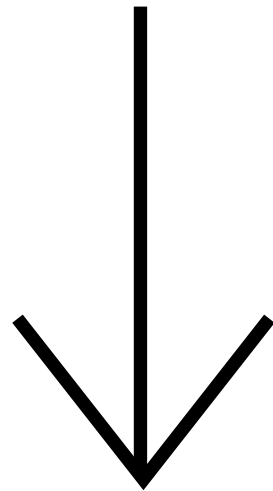


Sustainability Report

2023



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Leadership Letter

Over its 180-year history, C&A has undergone many changes, but one constant remains: our commitment to people and the planet. By democratizing fashion, our founders laid the groundwork for our current efforts to democratize more sustainable fashion. Our dedication to reducing product impact and pioneering the use of organic cotton reflects this unwavering commitment to sustainability.

C&A is a purpose-driven company with a deep-rooted commitment to sustainability. Our journey began in earnest over two decades ago, marking the start of a long-term endeavor to achieve meaningful and lasting change. Our sustainability goals are twofold: to recognize the impact of the fashion industry on the planet and to anticipate the changes necessary to mitigate this impact. The 2023 Sustainability Report

highlights the progress we've made toward these goals and introduces the necessary steps to elevate our ambitions further. Today, through continuous effort, 80% of our core materials are sourced more sustainably. We've reduced the volume of single-use plastic by 36% compared to the baseline, expanded our Cradle to Cradle Certified® range to include Babywear, and continued to make steady progress toward reducing our greenhouse gas emissions.

While we celebrate many positive achievements, we acknowledge that now is not the time to be complacent. As global sustainability challenges intensify, we continuously reassess our strategies and ambitions to stay at the forefront. Our renewed, bolder goals are clear: we commit to take an industry-leading role in doing what's best for people and the planet.

We focus on what we make—emphasizing sustainable materials and circularity principles; how we make it—minimizing environmental impact and enhancing worker well-being; and on all the people—creating affordable clothing for the many and clearly communicating to help consumers make informed choices. A strong commitment to equity, inclusion, and human rights forms the foundation of our sustainability journey.

We believe that business can be a force for good, and we are committed to partnering with like-minded organizations to drive meaningful, systemic change. Our sustainability journey is not a short-term effort but a long-term commitment rooted in genuine conviction and purpose. Guided by the strong values that have supported us for the past 183 years, we are dedicated to building a better future for generations to come.

“

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”

We are confident that our initiatives are on the right path, yet we recognize the need to continually raise our ambitions. With both the ability and willingness to lead the industry, we are determined to make steady, meaningful progress toward a more responsible and sustainable future. We owe it to our history, our customers, and future generations to lead this transformation and act boldly in pursuit of our sustainability goals.

C&A Leadership Team

Our *Approach*



Strategy



Our Sustainability approach at C&A is embedded into our purpose to inspire everyone, every day, to look, feel and do good. We are committed to mitigating our impacts and risks, and integrating sustainability seamlessly into our business decisions.

Our Sustainability Strategy encompasses every stage in our products’ lifecycle, and is built upon a strong foundation of equity, inclusion, and human rights. Specifically, our ambition is to lead the fashion industry in doing what’s best for people and the planet, focusing on what we make, how we make it, and benefiting all the people who wear our clothes.

This builds upon our legacy of industry-leading actions, such as our Cradle to Cradle Certified® products, and our long-standing support for organic cotton farming.

We are committed to identifying further measures to minimize environmental impact, promote human well-being, and engage with all our stakeholders in a responsible and meaningful manner.

Throughout this report, we look forward to sharing our successes as well as our challenges along this journey as we strive to create a more sustainable and equitable fashion system.

Approach	Environment	Social	Governance
	<p><i>Reduce Negative Impacts</i></p> <p>We continuously reduce our environmental impact and regularly update our goals</p>	<p><i>Improve Human Well-Being</i></p> <p>We are dedicated to enhancing well-being for everyone in our value chain</p>	<p><i>Enable the Right Decisions</i></p> <p>We strive to seamlessly integrate sustainability into all our business decisions</p>
	<ul style="list-style-type: none">• Significantly reduce CO₂e in our own operations and supply chain• Transition to circular resource use• Increase the share of renewable and/or recycled material• Continuously increase the use of safer chemicals	<ul style="list-style-type: none">• Respect human rights• Improve working conditions• Ensure health and safety at workplaces• Promote equity, inclusion, equal treatment, and opportunities for all	<ul style="list-style-type: none">• Firmly embed sustainability into our business processes• Foster and support ethical business conduct in our own organization and with all our business partners
Read More	Page 18	Page 49	Page 76

Achievements

We made great strides in 2023, addressing a range of challenges from climate change impact to single-use plastics.

Some achievements include:

80%

of our core materials¹ are sourced more sustainably².

80%

of electricity purchased for our own operations was renewable.

We reduced the volume of single-use plastic by

36%

against the baseline³.



We further increased the share of approved safe chemicals⁴ by

7%

against 2022.

Included Babywear to our Cradle to Cradle Certified[®] collection.

We provide financial protection to workers and their families through the pilot of an Employment Injury Scheme for Bangladesh’s ready-made-garment sector⁵.

1 Core materials are cotton, polyester and regenerated cellulosic fibres, which account for 89% of our materials.

2 Materials that have less of a negative environmental and/or social impact than its conventional counterparts based on industry tools such as the Textile Exchange Preferred Fibre and Materials index. We require that 100% of the materials we source more sustainably are substantiated by third parties.

3 Single-use virgin plastic reduction in stores, ecommerce and transport compared to baseline 2019. The baseline has been re-calculated, based on new methodology.

4 Chemical products that are checked and tested against the requirements of the ZDHC Manufacturing Restricted Substances List (MRSL), and the results are registered in the ZDHC Gateway. 2023 conformance rate: 89%. Reporting period Jan - Dec 2023.

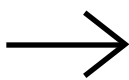
5 C&A is a participating brand in the EIS (Employment Injury Scheme) pilot project in Bangladesh.

2023 Progress Update

Our 2023 progress update includes progress that makes us proud, and also lessons we are applying as we continually improve. We are pleased to share progress on our reduction in greenhouse gas emissions, our increase in the use of more sustainable materials, and our commitment to animal welfare standards.

Throughout this report, we will share additional details on these topics, and on how we are continuing to work toward our goals in areas such as consumer-facing transparency and designing products for a longer life.

C&A is currently enhancing its strategy with additional goals, revised KPIs, and updated targets. The progress shown in the table is referring to previously measured KPI's for better comparability.



1 Baseline adjusted in alignment with the SBT boundaries.

2 CO₂e emissions reduction compared to 2018 baseline, focusing on GHG emissions covered within the SBT boundary.

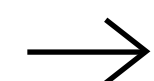
Our goals	KPI	Baseline	2023 Progress	Target
Act on clear, regularly reviewed climate change targets	% reduction in absolute greenhouse gas emissions across all scopes, by 2030	3,497,822tCo ₂ e (2018) ¹	–39% ²	–30% (2030)
Act as an industry leader in increasing the use of sustainable materials	% of core materials sourced more sustainable	68% (2019)	79.60%	100% (2028)
Innovate and connect circularity principles to our business and product	# out of 10 products with extended life through the way they are designed, produced, re-used	0/10 (2019)	1.6/10	7/10 (2028)
Pursue the elimination of plastic pollution	% of single-used virgin plastic in our stores, online shop and transport packaging reduced or replaced with sustainable alternatives	1,840 mt (2019)	–36.25%	–100% (2028)
Enable customers to make informed choices by increasing transparency around our products and business	% of customers who recognize they can make informed choices at C&A	44% (2021)	35%	55% (2028)
Continually improve and secure safe chemicals throughout our supply chain	% of chemicals used that are approved safe chemicals	79% (2019)	89.30%	100% (2028)
Protect animal welfare throughout our supply chain	% of core animal-based materials that are certified to defined animal welfare standards	5.2% (2019)	29.50%	75% (2028)

General *Information*



Basis & Scope for *Preparation*

This comprehensive sustainability report published by C&A discloses data and information specific to C&A's retail, service, holding, and sourcing companies operating for the European market in 17 retail countries.



The report covers the majority of related upstream tiers 1–4 and downstream consumer and end-user activities, C&A's own operations, and logistics where relevant.

We are committed to data accuracy, comparability, and consistency to enable year-over-year assessments of our progress and drive continued improvement in our performance. This report covers progress from our 2023 fiscal year (March 2023–February 2024), and also includes more recent updates where appropriate. In limited cases, we have found that reporting data according to the calendar year is more meaningful; calendar year data points are highlighted where relevant in this report. We report progress annually against the C&A Sustainability Strategy, which serves as our overarching sustainability framework.

We have a long history of voluntarily reporting against our sustainability goals. With regulated reporting on the horizon, we are aiming to incorporate upcoming requirements wherever meaningful at this stage. The Corporate Sustainability Reporting Directive (CSRD) legislation has been used as the overall guide for our 2023 reporting. We use this transition as an early start and phased approach to prepare for full compliance. As part of the CSRD legislation the following can be stated:

1. This report includes requirements from the German Supply Chain Act and the national implementation laws of the EU Whistleblower Directive ((EU) 2019/1937);
2. Our product groups (clothing, footwear, and accessories) have not significantly changed compared to previous reports; and
3. C&A does not trade in products or services that are banned in certain markets.

When we refer to time horizons we use the three definitions below:

1. short-term, which refers to the reporting period;
2. medium-term, which spans from the end of the short-term reporting period up to five years; and
3. long-term, which means more than five years.

We use both assessments and estimates for the reporting of some data points. Where estimates are used, we take a conservative approach. For example, a single garment cannot count for more than 20% toward our overall recycled cotton goal, even though that single garment may contain more than 20% certified recycled cotton.

Any significant changes in assessment or methodology are mentioned in the relevant sections. We have not made any major changes in the way data is prepared compared to previous reports. If, in individual cases, adjustments have been necessary to improve the information, references can be found in the relevant section.

We have not identified any substantial reporting errors in the previous sustainability report.

Our Business *Model*

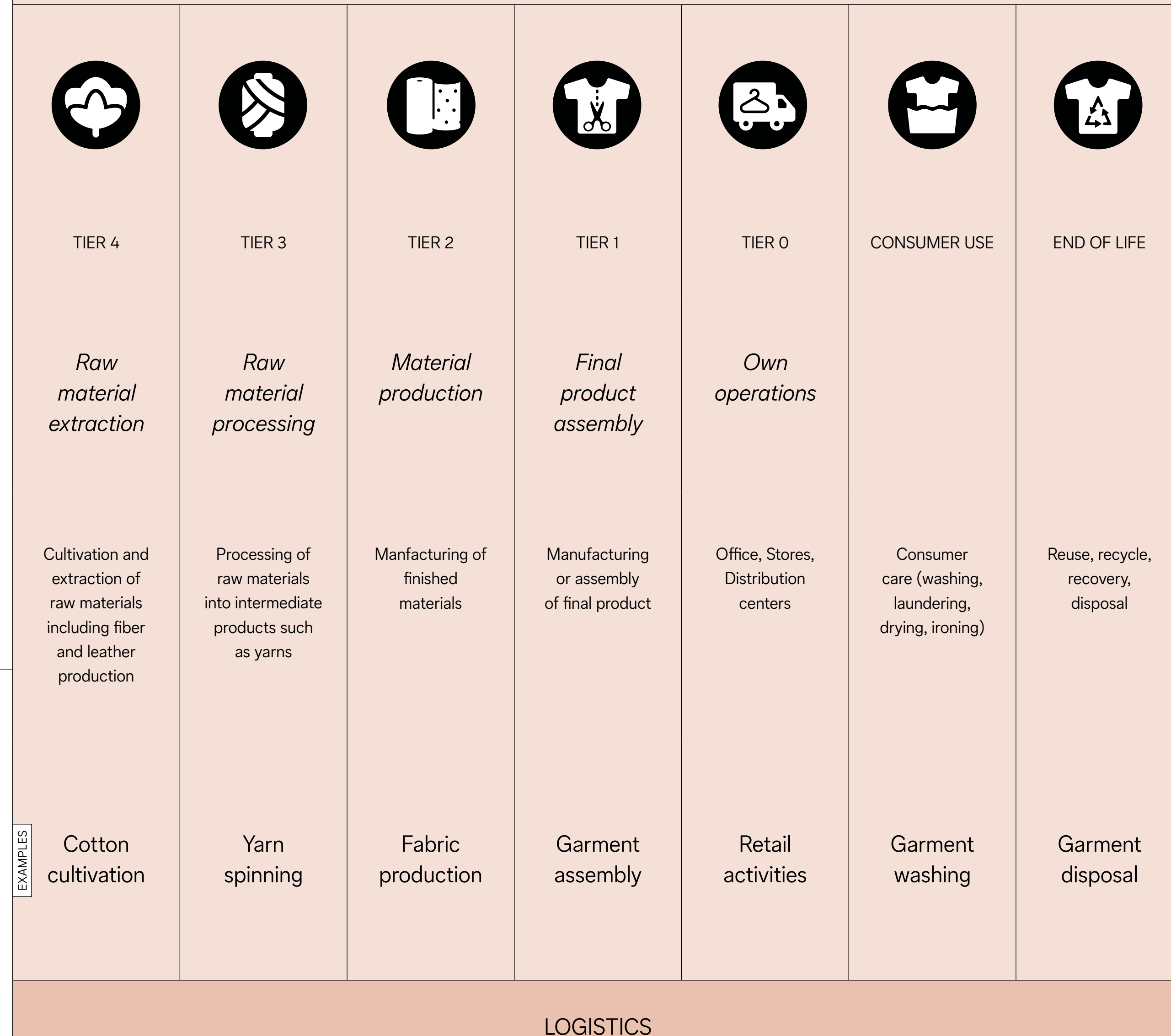
C&A is a fashion retailer operating a large network of physical retail stores in 17 European countries, supplemented by our online presence. With 1,300 stores and 24,660 employees, C&A is one of Europe's leading fashion retailers.



C&A operates only within the Wholesale and Retail trade (WWR) sector. Additionally, C&A owns the Factory for Innovation GmbH (hereinafter “C&A FIT”) which operates in the Manufacturing (textiles) sector. This is not a significant activity but enables C&A to innovate in sustainable manufacturing. C&A sells a wide range of clothing, footwear, and accessories for all genders and age groups. C&A offers fashion for all occasions at affordable prices, while providing integration between online and offline shopping,

including options like “buy online/pick up in-store.” To provide these products and services, C&A’s value chain includes a variety of stakeholders and encompasses a range of activities from the sourcing of raw materials (upstream) to the delivery of products to end users (downstream). Key steps along this path include raw material extraction and processing, material production, final product assembly, retail operations, consumer use, and end of life.

OUR VALUE CHAIN



C&A controls or influences a wide range of aspects across the value chain, from design to material sourcing, garment production, and retail. This approach allows us to manage costs, ensure quality, and respond quickly to fashion trends. C&A works with a network of suppliers and manufacturers, predominantly in Asia. We enforce strict ethical standards and a dedicated Code of Conduct.

We aim to minimize our environmental footprint by integrating preferred materials into our clothing and fostering circularity principles ([see page 46](#)). Ensuring our raw materials are sourced more sustainably means they are grown and manufactured in ways that use fewer natural resources, are less impactful to ecosystems, respect the wellbeing of people, and ensure the welfare of animals throughout the supply chain. C&A is involved in initiatives to promote a circular economy, such as garment recycling programs, and the development of products that are made to be recycled or have a second life through resale. These initiatives are detailed further throughout this report.

How We Integrate our Supply Chain Data

Since we work with partners and suppliers around the world to create and manufacture our products, we consider it critical to have a solid understanding of and visibility into the key parts of our value chain.

Our value chain (upstream) has been mapped using direct sources of information. C&A suppliers are required to disclose their sub-contractors and the

stages in which they are engaged. The upstream value chain stages are mapped to the best extent possible, with a focus on continuously improving data availability and accuracy, especially for deeper tiers of the supply chain. Accuracy does become more of a challenge when it comes to specific subcontractors located in tier 3 and beyond. However, we aim to continuously increase transparency in our supply chain.

In 2016, C&A signed the Human Rights Transparency Pledge. Since that time, we have disclosed the location and additional information of all our suppliers’ garment (cut & sew) factories producing for C&A, as well as their printing and embroidery units, laundries, and dye houses.

We also disclose fabric mills, further wet processing units, and regenerated cellulosic production facilities on our public supplier list which is available on the Open Supply Hub platform. Open Supply Hub is an accessible, collaborative, supply chain mapping platform, used and populated by stakeholders across sectors and supply chains. We update this list every six months to ensure that the information provided is up to date and relevant to our stakeholders.

To access C&A’s Suppliers’ Factory List please click [here](#).

ESRS Topic		UPSTREAM				OWN OPERATIONS	DOWNSTREAM	UPSTREAM / DOWNSTREAM	DOWNSTREAM
		TIER 4	TIER 3	TIER 2	TIER 1	TIER 0	CONSUMER USE	LOGISTICS	END OF LIFE
E1	Climate Change	×	×	×	×	×	×	×	
E2	Pollution	×	×	×	×	×	×	×	
E3	Water and marine resources	×	×	×	×				
E4	Biodiversity and ecosystems	×	×	×	×	×	×	×	×
E5	Circular economy	×	×	×	×	×	×		×
S1	Own workforce					×			
S2	Workers in value chain	×	×	×	×			×	
S3	Affected communities	×	×	×	×	×			
S4	Consumers and end-users					×	×		
G1	Business Conduct	×	×	×	×	×		×	

Governance & Strategy

C&A has a Supervisory Board and a Board of Directors.



The Board of Directors consists fully (100%) of dependent Board members. There are two executive members of the Board of Directors. The Supervisory Board consists fully (100%) of independent Board members and includes five non-executive members. We have two governance committees focused on sustainability issues: our Human Rights Governance Committee, and our Sustainability Governance Committee. Additionally, we provide further updates to the Board on relevant strategic topics on an ad hoc basis. In 2020, C&A set a strategy with a series of targets for 2028. These targets address many of our current material issues, including greenhouse gas emissions, circularity, and the use of water and chemicals. These have been the focus of our reports

to date. In 2023, we decided to update our strategy and review our targets. We are in the process of finalizing some of them; for example, work is underway on our new science-based target for 1.5 degrees of warming. The double materiality analysis performed in autumn 2023 confirmed many of our expectations and existing priorities and was also critical to informing the development of our C&A Sustainability Strategy as well as our new targets.

The C&A Sustainability Strategy is anchored in our overall purpose: “At C&A we inspire you every day to look, feel and do good.” Our C&A Sustainability Strategy is also considered a critical element of our business strategy and corporate values—indeed,

“we care for people and planet” is one of C&A’s five core values aiming to create fashion with a positive impact. We know that we cannot achieve our sustainability goals without changing elements of what we make (for example, choosing low-impact or recycled materials), how we make it (for example, designing for recyclability, working with safe chemicals, and improving working conditions), and how we work with consumers (for example, providing clear information and making it easier to dispose of garments responsibly) and so the strategy involves engagement across the whole business and value chain. Our sustainability strategy looks at each stage in the life of our products and assesses how we can improve to reduce environmental harm and promote human wellbeing.

Our ambitions are clear: we strive to take an industry-leading role in doing what’s best for people and the planet, focusing on what we make, how we make it, and for all the people who buy our clothes. The latest strategy update has an increased focus on our products, on workers, and on the environment surrounding both our supply chain (primarily Asia and Turkey) and the retail market (Europe).

Our approach aligns with the UN Guiding Principles on Business and Human Rights, the OECD Due Diligence Guidance, and the UN Sustainable Development Goals (SDGs).

Stakeholder Engagement

As part of our strategy development process and our double materiality assessment ([p.13](#)), we collaborated and actively engaged with selected global stakeholders

in a transparent manner. This enabled us to gain insights into key issues and it has informed our strategic priorities.

Our stakeholder engagement approach emphasizes the following principles:

CONSTRUCTIVE AND POSITIVE
We foster *positive* interactions

IMPACTFUL
Our efforts create *meaningful* change

AMBITIOUS AND PRAGMATIC
We set *ambitious* goals while remaining *practical*

THOROUGH AND MEANINGFUL
We prioritize *thorough* understanding and *meaningful* dialogue

By actively listening to our stakeholders’ perspectives, we incorporate their feedback into our material topics, business strategies, and programs.

In 2023, we engaged directly with stakeholders through interviews, visits, assessments, and surveys, and we also exchanged with representatives of impacted stakeholders through formal partnerships and initiatives. Our grievance mechanisms and customer survey channels also play a critical role in understanding stakeholder concerns.

C&A’s key stakeholder groups or representatives include customers, employees, supply chain workers, business partners, civil society, and policymakers.

Double Materiality Assessment (DMA)



Why We Are Doing a Double Materiality Assessment

In 2023 we conducted our second double materiality assessment (DMA) following detailed guidance from the European Financial Reporting Advisory Group and European Sustainability Reporting Standards. The standard guidance was not available at the time of the first double materiality assessment in 2022. We evaluate and prioritize material sustainability issues to ensure that we remain focused on the most

important issues and impacts of our company, value chain, and industry. Specifically, the key objective of this process was an assessment of C&A’s impacts, risks and opportunities throughout the various value chain stages. This assessment was a critical input for the C&A Sustainability Strategy review and update conducted later in the year, and it is also used to inform our overall risk management approach and our priority-setting.

DMA Methodology

The DMA evaluation was done with the support of a third party using the draft of the European Sustainability Reporting Standards (ESRS) topics to identify our impact materiality and financial materiality.

- The impact materiality is based on sustainability matters that relate to a company’s
 - a) material actual or potential, positive or negative, impacts on people or the environment,
 - b) over the short (one year), medium (up to 5), or long (more than 5 years) term,
 - c) including impacts in our own operations, upstream (tiers 1-4) and downstream (consumers and end users) value chain.

For actual impacts, materiality is based on the severity of the impact, while for potential impacts it is based on the severity and likelihood of the impact.

- Financial materiality requires disclosure of sustainability matters that (may) trigger material financial effects on a company’s development, e.g. cash flows, financial position or financial performance, in the short-, medium- or long-term. Importantly, this assessment is not limited to matters within a company’s control. We identified the risks and opportunities that affect (or may affect) our financial development, performance, and position by considering the impact of sustainability initiatives from multiple different perspectives, including:

- a) Economic impact of ESG factors,
- b) Risk management related to issues such as climate change, resource scarcity, regulatory changes, and social issues,
- c) Opportunity identification linked to sustainability trends,
- d) Stakeholder expectations regarding our sustainability performance and disclosures, and
- e) Strategic decision-making by integrating sustainability risks and opportunities into our financial planning and strategy.

We followed a clear process to identify and assess these impacts, following these steps:

1. SELECTING POTENTIAL TOPICS
We used the proposed list of topics in ESRS1, AR 16 as the starting point. This list was then updated with topics from a clothing and textile sector assessment, with further additions based on C&A’s 2022 materiality assessment, peer company reviews, rating agency analysis, and media research. This longlist was assessed and challenged by internal subject matter experts.
2. STAKEHOLDER ENGAGEMENT TO ASSESS TOPICS
We then selected a wide range of stakeholders to represent their own perspectives on our social, environmental, and economic impacts, and to share their view on the priority level of each topic. This stakeholder feedback was extremely valuable for assessing the materiality of different concerns.

All stakeholder consultations and discussions took place in a confidential manner, and associated data and outcomes were methodically aggregated.

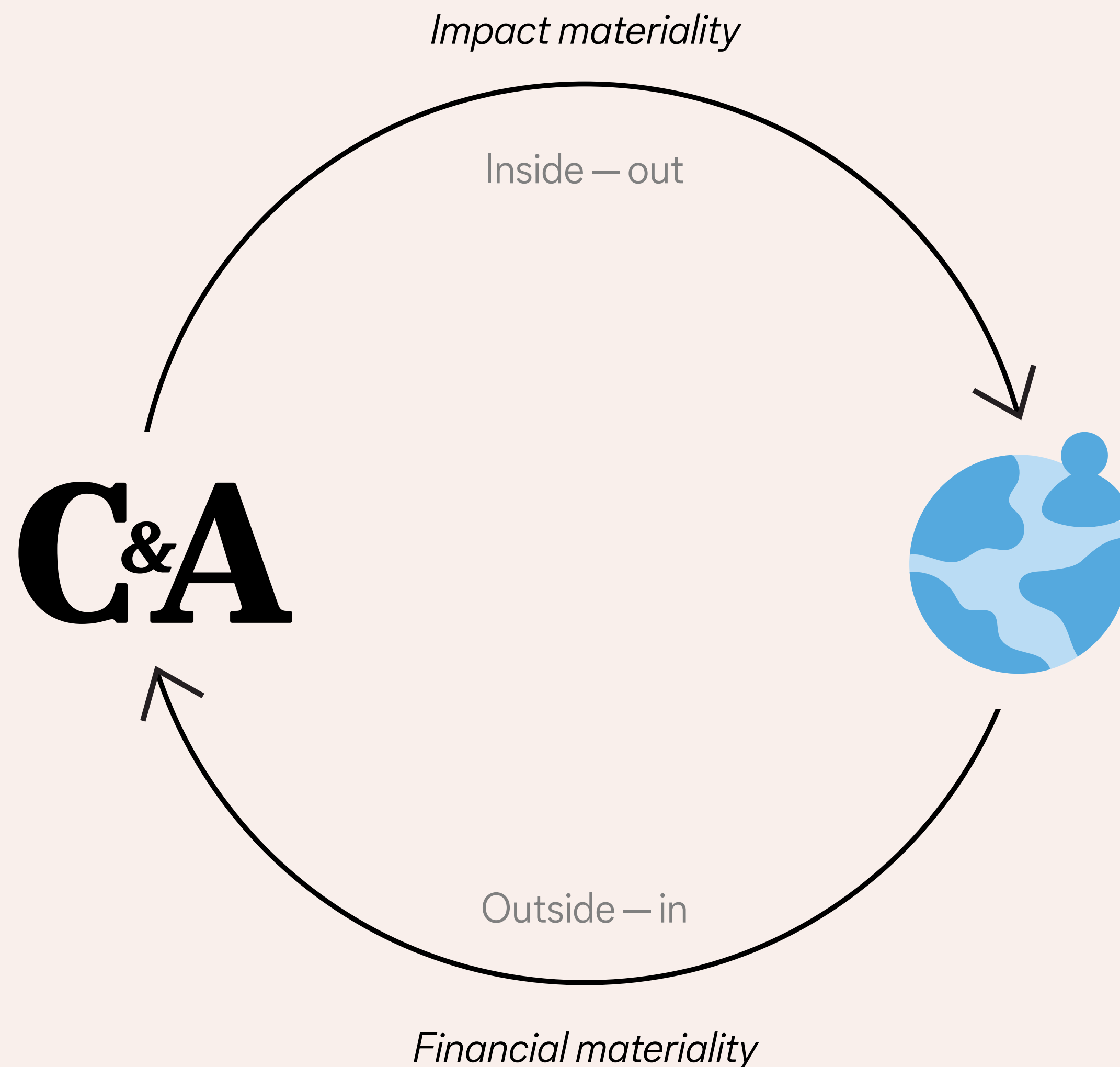
- Internal stakeholders included operational and subject matter experts across various departments as well as Worker's Council members to represent our own workforce.
- External stakeholders identified included NGOs, non-profit organizations, consumers, suppliers, service providers and trade unions.

We held various workshops and interviews with our internal stakeholders and conducted an external stakeholder survey. The outcomes of the workshops, interviews and surveys were methodically aggregated.

3. MATERIALITY SCORE CALCULATION

The scoring methodology varied slightly based on the type of impact.

- For negative actual impacts, the materiality score was calculated by adding the scores of scale, scope and irremediability.
- For negative potential impacts, the total added score was multiplied by the likelihood.
- For positive actual impacts, the score is the total of scale and scope only.
- For positive potential impacts, scale and scope are added and then multiplied by likelihood.
- Risks and opportunities were calculated using the size of the potential effect times the likelihood.



Summary of our main DMA considerations

IMPACTS WERE ASSESSED

- on a gross basis without taking mitigation measures already in place into account;
- as caused or contributed, actual or potential, and positive or negative, with special attention to negative impact;
- for own operations and value chain; and
- on a short, medium or long-term time horizon.

RISKS AND OPPORTUNITIES WERE ASSESSED

- considering financial impact and likelihood; and
- with special attention to risks.

We believe our DMA shows a realistic representation of C&A's impacts, risks and opportunities (IROs). We also acknowledge that certain IROs might not yet be represented to their full extent.

The focus of the assessment was on negative impacts and company risks. Except for the negative impacts on our own workforce, our consumers/end users, and some environmental impacts in our operations, the majority of our negative environmental and social impacts are located in the supply chain. The same is valid for our identified company risks.

For the identification of the material topics, we did not take into account any mitigation measures already in place. Most impacts are considered actual impacts since they are specific to the sector and the value chain alongside which C&A operates. Due to the nature of the impacts, most are considered long-term.

Some topics require special care, such as those where there is a higher risk of adverse impacts. For example, when identifying our impacts, risks, and opportunities (IROs) on workers in the supply chain, we focused on the workers in manufacturing and dedicated textile processing sites, especially printing, washing, dyeing, and embroidery units. Our annual Human Rights Risk Analysis delivers an indication on the scale, scope, and irremediability of negative impacts for these stages of production as we can combine site-level social compliance data and external reports on the human rights situation on a country and sector level. The identified negative impacts for these workers are also crucial to our external stakeholders, including trade unions, and relate strongly to our business model, which is largely dependent on manufacturing in our supply chain in specific regions. Additionally, we have also considered most severe potential negative impacts on workers in deeper supply chain tiers, such as workers being subjected to state-sponsored forced labor.

As expected, we have identified a significant number of impacts. The difference in approach and priority is mainly driven by the severity of the impacts. While we believe this approach delivered valuable insights, we also acknowledge that further adjustments in line with updated standards will be necessary. Our material impacts, risks, and opportunities for each topic are outlined in each relevant section of this report.

DMA Outcomes

After finalization of the impact and financial materiality assessment, we applied a quantitative threshold to determine our material topics.

We assessed 41 matters as material, falling under nine sustainability topics:

Using the terminology of the CSRD, material topics cover E1, E2, E3, E4, E5, S1, S2, S4 and G1.

ESRS		Environment
E1	Climate Change	Climate change adaptation
		Climate change mitigation
		Energy
E2	Pollution	Pollution of air
		Pollution of water
		Pollution of soil
		Pollution of living organisms and food resources
		Substances of concern and microplastics
E3	Water and marine resources	Water consumption
		Water withdrawals
		Water discharges
E4	Biodiversity & ecosystems	
E5	Circular economy	Use of resources
		Circular Fashion
		Waste management
ESRS		Governance
G1	Business conduct	Corporate Culture
		Protection of whistle-blowers
		Animal welfare
		Management of relationships with suppliers including payment practices
		Anti-bribery and corruption – Prevention & detection including training, incidents

ESRS		Social
S1	Own workforce	Work time
		Adequate wages
		Work- life balance
		Health and safety
		Gender equality and equal pay for work of equal value
		Training and skills development
		Diversity and equal treatment and opportunities
S2	Workers in the value chain	Harassment at workplace
		Working time in supply chain
		Adequate wages in supply chain
		Freedom of association, including existence of works councils
		Collective bargaining in supply chain
		Health & Safety in supply chain
		Gender equality and equal pay for work of equal value in supply chain
		Measures against violence and harassment in the workplace
		Child labour in supply chain
		Forced labour in supply chain
S4	Consumers and end-users	Water and Sanitation in supply chain
		Transparency
		Consumer protection/Data privacy
		Social Inclusion of consumers and/or end-users



The impact and financial materiality assessments were performed at the same time including dedicated experts per topic. Significant dependencies between impacts and related risks have been identified and considered such as physical risks related to climate change, risk in the supply chain due to shortage of raw materials, or financial risks due to potential reputational damages. Risks that are the most critical are at the top of the priority list.

The strategic risk assessment and the double materiality assessment were supported by the Head of Enterprise Risk Management. The expertise and guidance ensured a seamless linkage between our strategic company risks and our sustainability-related risks, providing a robust framework for addressing sustainability risks. Sustainability risks such as climate are critical risks and part of the 10 most significant business risks identified.

Biodiversity and animal welfare were added as material topics compared to our 2022 Materiality Assessment. There are no additional material topics besides the material topics that are covered under the European Sustainability Reporting Standards (ESRS).

The material topics have been verified by our Leadership Team and all of the topics are either addressed by the C&A Sustainability Strategy or will be integrated into it in the coming months.

Our Impacts and Risks

Once we identified and prioritized our impacts, we began establishing monitoring processes to track any adverse impacts or changes of impacts which may occur. Some of these monitoring processes are embedded into existing programs already in place; for example, we are monitoring the impacts on our own workforce and the workers in our supply chain through direct engagement with workers, our grievance mechanisms, and our social auditing protocol. Our approach to business conduct (p.17) also invites engagement with consumers, co-workers, suppliers, and business partners. We also prioritize data protection (p.71). For the majority of our environmental impacts in the supply chain, we use the Higg FEM to monitor our impacts and mitigate our risks. For the rest of the identified impacts, new monitoring approaches will be established.

The actions we take to

- *identify,*
- *monitor,*
- *prevent,*
- *mitigate,*
- *remediate, or*
- *bring an end to*

actual or potential adverse impacts related to our material topics are described alongside each material topic. Action plans ae included per topic where relevant. However, we would like to highlight three key actions through which we are addressing major concerns:

- Improving health and safety for workers in the value chain and the EIS (Employment Injury Scheme) pilot project in Bangladesh ([p.67](#));
- Reducing pollution of soil and the RPLC (Regenerative Production Landscape Collaborative) project ([p.34](#)); and
- Fostering circular fashion and the expansion of Cradle to Cradle® to our Babywear collection ([p.46](#)).

Integrating the DMA into our Sustainability Strategy

We know that the fashion industry is one of the most polluting industries on the planet, and we are taking steps to revise our way of working to address this. There are three main sets of choices that underpin our material impacts:

- *what we make;*
- *how we make it; and*
- *how our consumers use their clothes.*

Our C&A Sustainability Strategy, which is informed by the results of our materiality assessment, guides us to rethink each of these steps within this context.



What we make

We are accelerating our shift from a ‘push’ model of selling to a ‘pull’ model, which helps us focus on only making clothes that consumers actually want to buy. A critical initial step was the reduction of collection size in 2022 and 2023. This is one way of reducing waste throughout our supply chain. We are introducing the principles of durability and circularity into more of our design choices. We are also reviewing our fabric portfolio to ensure that we are increasing the recycled and recyclable content in our products.

How we make it

We are reviewing our manufacturing base to address the socially and environmentally material issues in our supply chain. We are doing this by improving traceability, enabling a much clearer line of sight into all material issues. We are working with our suppliers on improving their environmental impacts, and we are actively engaged in several programs to ensure the wellbeing and human rights of workers in the supply chain.

How our consumers use their clothes

We are starting initiatives to help our consumers to extend the lives of their clothes and to manage waste responsibly. This includes our We Take It Back initiative and our pilot program with our partner Carou for selling second-hand clothing in selected stores. We have launched additional initiatives focused on improving the durability of our products so that consumers can extend the life of their clothes.

These initiatives, which are explained in more detail throughout this report, help us to address the material issues identified above.

Several key material topics are covered under Environmental Information. Here we describe our strategy and our actions on topics ranging from climate, pollution, and safer chemistry to materials, microfibers, resource use, and the circular economy.

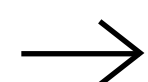


Environmental *Information*



Climate *Strategy*

This section discloses information on the following material topics: *climate change adaptation, climate change mitigation, and energy.*



Climate change ranks among the most serious crises of our time, which is why it is a material topic, and therefore receives significant focus. The production of textiles contributes to greenhouse gas emissions, and ultimately climate change, in a number of ways. Textile production requires significant energy use, which may rely on fossil fuels. Large amounts of energy are required for the growth or synthesis of raw materials (such as cotton, wool, and synthetic fibers), as well as for the development and use of the chemicals needed to dye, finish, and treat textiles. Additionally, water must be both heated and treated during textile production and processing, requiring additional energy. This energy is also needed to power machinery, heat buildings, and provide lighting. Finally, components and products must be transported around the world. Climate change is also a strategic issue for business continuity; changes in the climate pattern and more extreme weather events mean that business activities might be disrupted, leading to reduced revenues and decreased profit margins. We carefully consider many types of risks as we continually update our climate impact mitigation strategy. Two risk types of note are our physical risks and our transition risks.

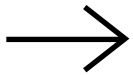
Our *physical risks* sit mainly within our production facilities, many of which are located in vulnerable areas. These facilities might be impacted by climate-related physical risks such as increased frequency and severity of extreme weather events (e.g. wildfires, cyclones, hurricanes, or floods) resulting in harming health of workers, damage to facilities, causing scarcity of resources, increasing raw material costs, or leading to disruption of supply chains. All of these scenarios could potentially cause negative financial impacts.

Our *transition risks* come from legislation, for example requirements related to carbon pricing from investing in clean energy sources which may require significant financial outlay. Transitioning to more eco-friendly supply chain practices may require significant upfront capital investment, potentially impacting short-term profitability and increasing financial strain. Additionally, changes in transportation methods may affect delivery times, possibly causing supply chain disruptions and operational risks.

To address these critical risks and to mitigate our climate impact, we align with leading initiatives such as the Science Based Targets initiative (SBTi) and the EU Paris Aligned Benchmarks, in which C&A is included. All of these considerations factor into the implementation of our Sustainability Strategy, which forms the backbone of our efforts to shape a more sustainable fashion industry.

Progress *Update*

The table on the right shows the emissions across our value chain from 2018–2023¹.



The baseline value is always consistent with the reporting boundary. In case of significant changes to the organizational boundaries, the baseline values and the years in between will be re-calculated.

1 The table shows CO₂e emissions reduction compared to a 2018 baseline.

2 Due to limitations of HIGG FEM data (explained on page 21) emissions for this sub-category were not able to be broken out and were included in other, production-related sub-category.

3 No data for rail transportation available for the baseline. Therefore, a progress calculation is not possible.

4 No data available for previous years. Therefore, a progress calculation is not possible. More details can be found in the section "Data Quality".

(tCO ₂ e)	2018 Baseline	2019	2020	2021	2022	2023	2023 vs.2022	2023 vs.Baseline
SCOPE 1								
Direct emissions from sources owned and controlled by the company	18,724	19,113	13,646	16,959	13,960	12,893	-7.6%	-31%
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	—	—	—	—	—	—	—	—
SCOPE 2								
Purchased or acquired electricity, steam, heat and cooling (<i>market-based</i>)	80,753	78,322	54,410	113,840	48,149	37,648	-21.8%	-53.4%
Purchased or acquired electricity, steam, heat and cooling (<i>location-based</i>)	149,479	138,810	105,397	86,178	87,027	85,829	-1.4%	-42.6%
TOTAL SCOPE 1 & 2 EMISSIONS	99,477	97,435	68,056	130,799	62,109	50,541	-18.6%	-49.2%
SCOPE 3								
Purchased goods and services								
Raw material production	766,840	691,760	499,573	517,376	481,252	490,421	1.9%	-36.0%
Yarn production	927,126	877,970	580,795	619,202	779,511	670,068	-14.0%	-27.7%
Fabric production	946,334	891,439	602,620	457,304	606,679	700,653	15.5%	-26.0%
Integrated production	472,975	524,260	258,790	428,625	52,330	0 ⁽²⁾	-100%	-100.0%
Garment assembly	262,051	300,720	362,767	284,517	230,853	201,756	-12.6%	-23.0%
Non–garment	23,019	26,829	20,167	63,695	18,795	31,121	65.6%	35.2%
Water	4,434	4,091	2,645	2,367	68	64	-6.1%	-98.6%
Other retail spend	424,612	355,460	342,177	310,542	303,922	241,112	-20.7%	-43.2%
Fuel and energy related activities	23,676	21,014	18,628	35,157	30,144	21,907	-27.3%	-7.5%
Upstream transportation and distribution								
Air transportation	53,077	32,509	94,719	38,508	7,133	12,872	80.5%	-75.7%
Rail transportation	–	875	3,741	5,199	65	394	507.7%	0 ⁽³⁾
Sea transportation	78,751	71,738	63,419	102,239	131,206	13,213	-89.9%	-83.2%
Truck transportation	298,847	256,804	225,510	238,039	277,985	160,130	-42.4%	-46.4%
Waste generated in operations	4,352	4,240	2,684	2,820	3,013	4,449	47.6%	2.2%
Business travel	817	646	268	310	459	571	24.4%	-30.1%
Employee commuting	48,352	44,828	35,975	41,658	40,473	33,879	-16.3%	-29.9%
Downstream transportation and distribution	—	—	—	—	—	840	0 ⁽⁴⁾	0 ⁽³⁾
Use of sold products	580,737	541,080	460,020	349,324	319,596	288,208	-9.8%	-50.4%
End of life treatment of sold products	28,713	27,722	25,720	20,414	19,918	15,936	-20.0%	-44.5%
TOTAL SCOPE 3 EMISSIONS	4,944,713	4,673,985	3,600,217	3,517,295	3,303,406	2,887,594	-12.6%	-41.6%
TOTAL GHG EMISSIONS (MARKET-BASED)	5,044,190	4,771,419	3,668,273	3,648,094	3,365,515	2,938,135	-12.7%	-41.8%
TOTAL GHG EMISSIONS (LOCATION-BASED)	5,112,916	4,831,907	3,719,260	3,620,431	3,404,392	2,986,316	-12.3%	-41.6%

Actions

Data Quality

We are continuously working to increase the accuracy of our data through improved emission tracking and increased data accuracy for key impact categories, such as raw material sourcing, product manufacturing, and logistics.

Significant changes in data quality in 2023 include the following examples:

- For cotton, the largest volume of raw material that we source, we were able to share more granular data on the geographic footprint allowing a more accurate emissions factor to be used.
- In the case of polymer-based products, we noticed a significant increase regarding our emission, which is due to an update of the emissions factors used.
- For product manufacturing, we started systematically tracking our product manufacturing allocation from tier 1 to tier 3¹ per shipment order from late 2022. This enables us to calculate a more accurate and realistic product footprint based on the production process. We were using the Higg FEM industry tool Worldly Facility Environmental Module to collect verified primary energy and water data from our production units with wet processing over the past four years. However, due to significant changes in the latest version of FEM, we extended the deadline for our production units to complete the FEM.

As a result, we were unable to use FEM data for 2023 carbon accounting. To comply with the CSRD reporting timeline and requirements, we started collecting the primary energy and water data from our strategic suppliers from 2024 under the C&A Manufacturing Climate Program. This provides us with more visibility and flexibility regarding the carbon performance and data accuracy of our suppliers and their production units.

- For emissions related to the transportation and distribution of products purchased in the reporting year, we improved our emissions accounting method between our tier 1 suppliers and our own operations. This year, for approx. 98% of this data, we were able to share more granular information and switch from a spend-based Life Cycle Assessment (EIO-LCA) model that converted transportation costs into greenhouse gas (GHG) emissions to an activity-based approach that uses actual distances traveled.
- In addition, this year we were able to include emissions related to our online business activities to our GHG inventory for the first time². See additional details in our GHG inventory table on [page 20](#).

These methodological changes, primarily driven by improved data availability and transparency, enhance our accuracy and accountability. This represents a significant step forward, enabling us to more accurately reflect our efforts to reduce emissions and track our progress toward our targets. To ensure a transparent comparison between the baseline and future years we will revise our baseline accordingly during the process of target setting outlined on [page 20](#).



¹ Tier 1 refers to final product assembly production units, typically including cut and sew, garment finishing, or other pre-assembly processes; Tier 2 refers to manufacturing finished material production units, covering dyeing, embroidery, fabric mills, printing, and washing processes; Tier 3 refers to raw material processing production units, which normally means spinning pro

² Category 9: Downstream Transportation and Distribution

Direct Emissions from Own Operations

To achieve emission reductions in scopes 1 and 2, we continued to focus on increasing our energy efficiency and on the procurement of renewable electricity.

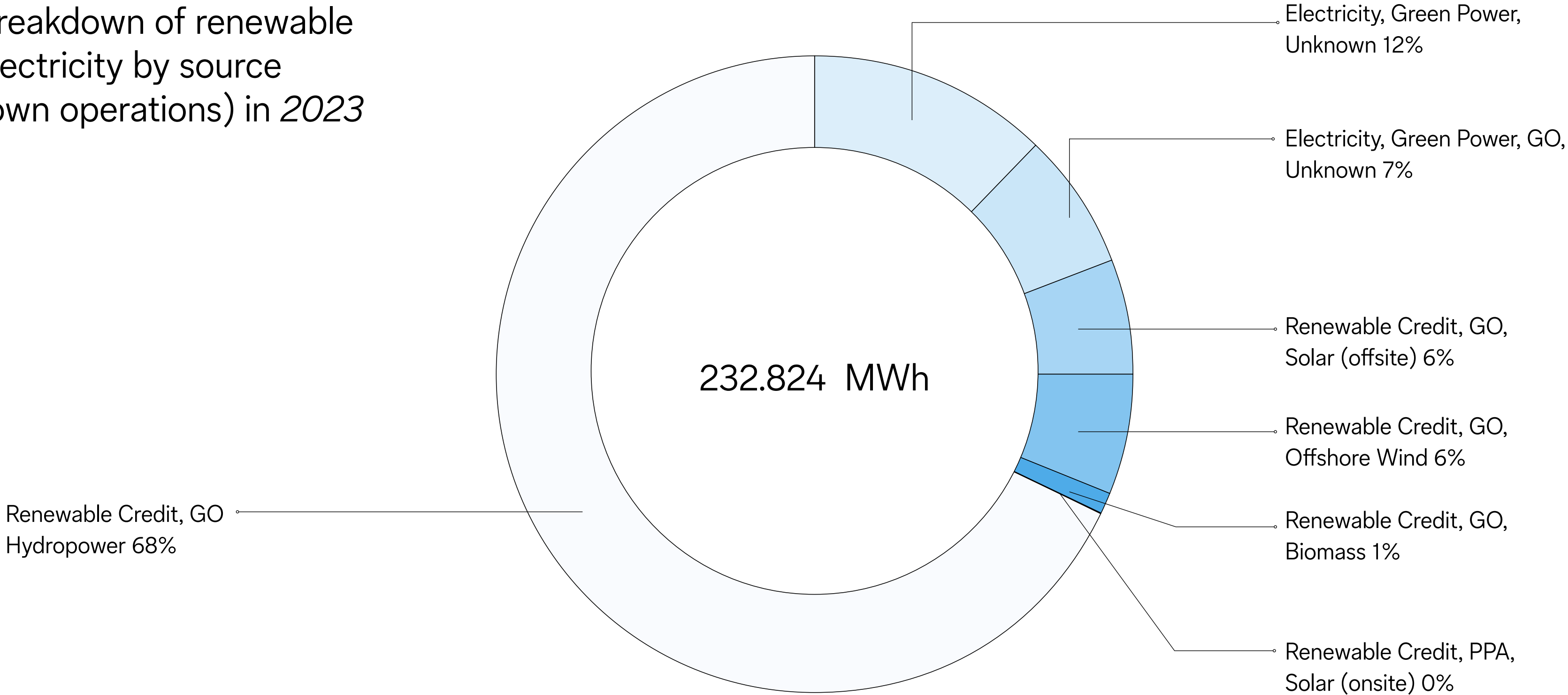
SPOTLIGHT ON LED RETROFIT INITIATIVES

As part of our ongoing commitment to increase energy efficiency in our own operations, our focus this year was directed toward lighting, which represents a significant contribution to our energy footprint. The results of our investigations revealed that only one-third of our stores are equipped with LED lighting. To address this, we are now prioritizing the transition to more efficient lighting solutions. We plan to launch an LED retrofit program, which will target the installation of energy-efficient LED lighting in all our stores without existing LED installation, by the end of 2027. This initiative is projected to reduce total scope 2 electricity consumption by approximately 50%.

SOURCING RENEWABLE ENERGY

In addition to our lighting initiative, we have also been focusing on the use of energy from renewable sources. We continued to procure electricity from renewable sources, which accounted for 80% of our total electricity consumption in our own operations in 2023. This is secured through 100% Renewable Guarantees of Origin certificates.

Breakdown of renewable electricity by source (own operations) in 2023



RENEWABLE SOURCE	MWh
Renewable Credit, GO, Hydropower	158,069
Electricity, Green Power, Unknown	28,408
Electricity, Green Power, GO, Unknown	16,785
Renewable Credit, GO, Solar (offsite)	14,620
Renewable Credit, GO, Offshore Wind	12,411
Renewable Credit, GO, Biomass	2,502
Renewable Credit, PPA, Solar (onsite)	30

Breakdown of contractual instruments used
for Renewable Energy Attribute Claims in
2023 (own operations)

SOURCING METHOD	TRACKING INSTRUMENT	TOTAL MWH FROM RENEWABLE SOURCES	MWH FROM ENERGY BUNDLED WITH RENEWABLE ATTRIBUTES	MWH FROM UNBUNDLED RENEWABLE ATTRIBUTE CLAIMS	% MWH FROM ENERGY BUNDLED WITH RENEWABLE ATTRIBUTES	% MWH FROM UNBUNDLED RENEWABLE ATTRIBUTE CLAIMS
Default delivered electricity from the grid (e.g. standard product offering by an energy supplier), supported by energy attribute certificates	Contract	28,408		28,408		100%
Purchase from an on-site installation owned by a third party (on-site PPA)*	Contract	30	30		100%	
Default delivered electricity from the grid (e.g. standard product offering by an energy supplier), supported by energy attribute certificates	GO*	204,386	204,386		100%	
Total		232,824	204,416		87.8%	0.0%

*PPA (Power Purchase Agreement)
*GO (Guarantees of Origin)

Scope 2: market-based GHG emission
credits by contractual instruments

CONTRACTUAL INSTRUMENT	TOTAL CREDITS (-TCO2E)	% OF EMISSION CREDITS
Electricity, Renewable Credit, GO	103,823	99.98%
Electricity, Renewable Credit, PPA	20	0.02%
Total	103,843	100%

Indirect Emissions from Product Manufacturing

Our approach to reducing supply chain emissions involves a collaborative effort with suppliers to collectively meet climate targets. We conducted research to assess the carbon performance and capabilities of 21 key suppliers through qualitative questionnaires and in-depth interviews. Among these suppliers, 18 have established their own or customer-mandated carbon reduction targets, ranging from 5-60% GHG reduction by 2025 or 2030, with some aiming for net-zero emissions by 2033. Recognizing the importance of engaging subcontractors and their tier 2-3 partners to gather environmental data, suppliers are laying the groundwork for the Manufacturing Climate Program, scheduled for launch in 2024.

This first C&A Manufacturing Climate Program sets emissions reduction requirements for suppliers, including phasing out coal by 2025-2028. Nine strategic suppliers (21% of FY2023 business) are part of the initial 2024 launch, which involves regular reporting, capacity building, and carbon target monitoring. The program aims to collectively lower emissions, meet regulatory disclosure rules, and integrate supplier carbon performance into business decisions.

Case Study

This year, C&A participated in a pilot project in Cambodia conducted in partnership with WWF and four brands. The aim of the project was to identify sustainable wood for use as a thermal energy source using a mobile app (WoodAI app). This action helps to safeguard forests by minimizing the use of endangered forest wood for thermal fuel in production operations. Six production units in Cambodia participated in the training and pilot program from September 2023 to March 2024. We believe that this project has the potential to drive positive change in the fashion industry and we want to further promote the use of sustainable biomass through the WoodAI app.



Targets

GHG Reduction Targets

In 2020, we set our first GHG reduction targets in alignment with the Paris Agreement's goal of limiting global warming to well below 2°C compared to pre-industrial level. These targets were:

- 1. Achieve an absolute GHG emissions reduction of 30% for our offices, distribution center and retail stores by 2030 against the base year of 2018.
- 2. Achieve an absolute GHG emissions reduction of 30% in our value chain by 2030 against the base year of 2018.

Our target boundary includes 100% of scope 1 and 2 emissions, and 68% of scope 3 emissions¹. We determine our GHG emissions inventory for scopes 1, 2, and 3 in accordance with the GHG Protocol using an operational control approach.

In 2023 we see a further decrease in our emissions, achieving a 42% reduction in our overall total GHG emissions and a 39% reduction in GHG emissions within the SBT boundary compared to our 2018 baseline. Our 2023 achievement already puts us ahead of our initial 2030 target. This early emission decrease was largely based on reduction of collection size, improvements in methodology and availability of primary data (see our explanation on [page 21](#)) rather than fundamental,

intentional changes in our supply chain. In line with our ambition to further drive emission reductions we need to take more impactful actions across our supply chain.

This is why, in 2024, we committed to the Science Based Targets initiative (SBTi) that we will revise our near-term target and set a new net-zero company-wide target that aligns with the trajectory to limit global warming to 1.5 degrees Celsius. The SBTi has already confirmed our commitment. The next steps involve setting and submitting our targets for validation and obtaining official approval from the SBTi.

Planning for Climate Change Adaptation and Mitigation

As part of our ongoing climate commitment, we are developing our first climate risk and resilience analysis and a transition plan. This will detail our ambition to transform our value chain to reach our climate targets.

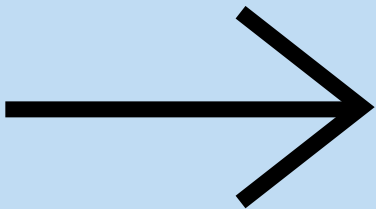
¹ Based on the SBTi's 'Well-below 2 degrees' scenario provided by the SBTi V4 guidance in 2020 (focus: European market).
² Total scope emissions covered by the SBT (100% scope 1 + 2; 68% scope 3, coming from category 1: purchased goods and services incl. capital goods).

SCIENCE BASED TARGET EMISSIONS ²	2018 BASELINE	2023	TARGET YEAR 2030	REQUIRED REDUCTION	ACHIEVED REDUCTION
SCOPE 1 GHG EMISSIONS (tCO ₂ e)	18,724	12,893	13,107	29,843	48,936
SCOPE 2 GHG EMISSIONS (tCO ₂ e)	80,753	37,648	56,527		
SCOPE 3 GHG EMISSIONS (tCO ₂ e)	3,398,345	2,094,019	2,378,842	1,019,504	1,304,326
TOTAL GHG EMISSIONS (tCO ₂ e)	3,497,822	2,144,560	2,448,475	1,049,347	1,353,262



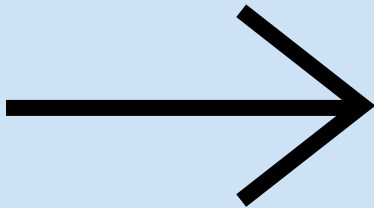
The following steps must be taken this and next year to support our climate commitment:

Impact, risk & opportunity Management



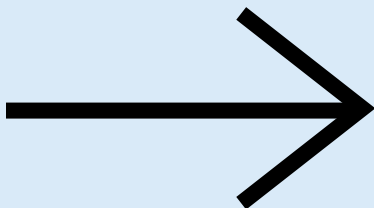
- Identify and assess material climate-related impacts, risks and opportunities
- Evaluate, prioritize risks and develop risk mitigation and adaption plan and build resilience
- Assess financial impacts

Calculate & disclose impact



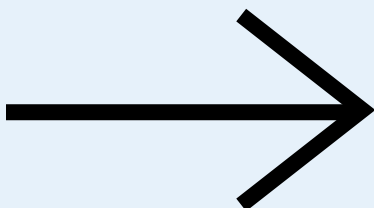
- Collect GHG emissions and energy use data in line with CSRD
- Ensure transparent disclosure and reporting

Address direct & indirect impact



- Update near-term science based targets, develop a new net-zero target in line with 1.5 degree pathway, and define a new base year
- Refine key decarbonisation levers based on our Sustainability Strategy and quantify the expected emissions reduction impact
- Prioitize actions for emissions reduc-tions with high potential for impact

Transition plan for climate change mitigation



- Refine our transition plan based on our Sustainability Strategy and ensure it is embedded and aligned with C&A's overall strategy and financial planning
- Integrate climate action measurements at management board level to ensure accountability and responsibility

Pollution *Strategy*

This section discloses information on the following material topics: Pollution of water, pollution of soil, microplastics, and substances of concern. Specific actions related to our major raw materials are also detailed.



Our business relies on the natural environment and the resources it provides. This represents a responsibility which C&A takes seriously – and we expect our suppliers to do the same. Clothing and textile manufacturing processes use chemicals and heavy metals that may result in water and soil pollution, impacting aquatic life, ecosystems, food resources,

and human health. The disposal of chemicals, dyes, and solvents used in manufacturing can also contaminate water sources. In cotton farming, excessive pesticide and fertilizer use can contaminate soil, compromising its fertility and disrupting ecosystems. Soil degradation affects crop yields, impacting the livelihoods of farmers and food security.

We are proactive in managing the environmental performance of our suppliers and we go beyond compliance wherever possible. Our approach to minimizing and managing pollution considers the location and the specific production processes of our business partners, as well as any relevant local, national or international regulations on emissions to air, land use, biodiversity, and noise or odor pollution. Based on the situation and the results of our materiality assessment, other aspects may be considered as well.

Additionally, we aim to align our policies with leading industry initiatives and emerging legislation. With a view to the EU Action Plan “Towards a Zero Pollution for Air, Water and Soil,” we have systems in place to ensure the use of safer chemicals, to test wastewater, to track consumption data, and to assess additional environmental parameters such as air emissions. This is all detailed in the C&A Code of Conduct and our Environmental Stewardship Manual and explained further below.

C&A’s process for determining material risks, impacts, and opportunities related to pollution is embedded within our overall Double Materiality Assessment process (p.13). Both internal and external stakeholders are consulted as part of the process, and pollution came out as a significant material topic for us. Our policies as well as our actions related to pollution of air, pollution of water, and pollution of soil are detailed below.

Policies Related to Pollution

C&A’s environmental efforts in manufacturing focus on the processes with the greatest environmental impacts, meaning those processes using significant quantities of energy, water and chemicals as well as those resulting in substantial discharges of wastewater. The bulk of our pollution-related impacts occur in our upstream supply chain, within the operations of our supply chain partners who conduct activities like cotton growing or wet processes like dyeing and finishing. The core document that outlines our policy on pollution is our C&A Code of Conduct, which must be implemented by all suppliers as a condition of doing business with us.

The C&A Code of Conduct is supported by our Implementation Guideline, which is intended to help our suppliers ensure they are compliant with our requirements and partnering with us in our efforts to improve the industry.

Section 2 of the C&A Code of Conduct is built upon the central requirement of legal compliance, which is driven by C&A’s own policies and obligations to external organizations and programs, such as the Zero Discharge of Hazardous Chemicals (ZDHC) Program.

Additionally, C&A has policies, aligned with leading industry initiatives, on specific topics as needed. We have a policy in place on sludge handling to avoid soil and ground pollution and to ensure proper discharge of domestic and/or industrial wastewater without leakage and/or bypassing.

C&A also has policies on how to dispose of waste responsibly without open burning, open dumping, burying waste, or intentional release of waste into soil and/or water.

Lastly, C&A has also set requirements for materials. Suppliers of regenerated cellulose, for example, must conform to CanopyStyle audit requirements to ensure the protection of endangered forests and ecosystems. Our core suppliers Birla and Lenzing have achieved a “dark green shirts” rating in the Canopy Style Initiative. This rating indicates that a producer has been audited and assessed as being at low risk or has taken substantive action to eliminate known risks of sourcing rayon and viscose from ancient and endangered forests. As viscose and modal can have a significant environmental impact during manufacturing if chemicals are not properly managed, those manufacturers share our commitment to the Changing Markets Foundation Roadmap to Responsible Viscose Production.

How We Implement Our Supplier Requirements on Pollution

We expect our partners to cascade our requirements down to their own partners as well; suppliers must ensure that their production facilities, suppliers, and subcontractors involved in production for C&A follow our requirements listed in the C&A Code of Conduct and Environmental Stewardship (ES) Manual. Within their own operations, suppliers must be able to show evidence of their consideration of environmental impacts as part of their business decision-making processes.

As specified in our Manual, suppliers must also assign responsibility for environmental performance to a senior management representative.

When requested, suppliers must provide C&A with accurate environmental data within one month of the request, or an alternative agreed-upon period. This includes but is not limited to data covering:

- *energy,*
- *water,*
- *wastewater,*
- *chemicals, and*
- *air emissions.*

Suppliers must take steps to verify their data, using approved third parties, if necessary, within a period specified by C&A.

Additionally, suppliers are held responsible for the proactive and timely remediation of environmental issues, and they must transparently communicate details of such remediation actions with C&A.

Additional Implementation Requirements: Management Systems

We require a management system approach to pollution minimization, and our Implementation Guideline includes many of the specific expectations we have of our suppliers, including:

- Suppliers must have a formal environmental management system in place to monitor and improve the environmental performance of their production facilities.
- Suppliers must have a framework for setting, reviewing, and reporting on environmental objectives and targets on an annual basis.
- When requested, suppliers must be able to evidence a management system via written policies, planning documents/tools, documented procedures, measurements, and management plans.

So that we may monitor performance and compliance, suppliers must disclose relevant environmental data within one month of any request, unless otherwise agreed. Suppliers should also ensure they have conducted a risk assessment to identify and understand the environmental risks present at production units or facilities where they maintain operational control.

Remediation and Capacity Building

Our Implementation Guideline also specifies how we expect our suppliers to engage with us in cases where remediation is necessary, or where learning would be valuable. For example, all suppliers are aware of the following expectations:

- Suppliers shall participate in environmental remediation processes undertaken by C&A in the spirit of learning and continuous improvement.
- Suppliers must inform and train workers on the environmental impacts of their production and the

- relevant measures to avoid or mitigate the impacts.
- Suppliers shall engage in capacity building activities assigned by C&A. This includes training and awareness sessions provided by C&A and our external partners.

Expectations on General Environmental Discharges

Our C&A Code of Conduct contains indications and expectations toward suppliers in terms of general environmental discharges. These include the following:

- Suppliers must measure, monitor, and minimize discharges to the local environment, including emissions to air, water, and land, and take steps to limit noise pollution.
- Suppliers must ensure wastewater is treated sufficiently prior to discharge from site, in line with local and national regulations and, where applicable, ZDHC requirements.
- Suppliers must conduct wastewater tests as required to meet all national and local legal requirements and share wastewater quality data with C&A and stakeholders, when requested.
- Suppliers shall seek to reduce waste through operational efficiencies and facilitate the reuse and recycling of waste where possible.
- Regulations on the transboundary movement of hazardous waste must be followed at all times.

Progress *Update*

Our actions to address pollution encompass assessments, industry collaboration on issues like safer chemicals and water stewardship, and careful management of chemical inputs, processes, and outputs. We also work to continuously build the capacity and knowledge of our teams and our partners.

Actions



Environmental Assessments

Many of our suppliers’ processes, whether in factories or mills, are interrelated. This means that a particular process or technology can have an impact on energy, water, and chemical use. For this reason, we adopted a more systemic approach to consider the links between climate, water, and chemicals, and bundled these topics in our Environmental Stewardship Program,

in which the teams involved are closely connected. The biggest impact in production is in wet processing, which mostly fall under tier 2. At C&A, we focus on the environmental performance of these manufacturers, namely fabric mills, dyeing facilities, and washing plants.

¹ Chemical products that are checked and tested against the requirements of the ZDHC Manufacturing Restricted Substances List (MRSL), and the results are registered in the ZDHC Gateway.

To track and review their progress in reducing the negative environmental impact of factories, we use the Higg Facility Environmental Module (FEM). Manufacturers fill out a comprehensive self-assessment questionnaire focusing on their environmental performance. The Higg FEM includes questions on environmental management systems, energy, water, emissions, waste, and chemicals. C&A requires independent, external verification of the data. Once the data has been verified, manufacturers receive customized advising and capacity building from C&A based on their performance and success in achieving more sustainable production. The Higg FEM provides a snapshot of the environmental impact of the facilities that make our products and helps us identify and prioritize opportunities to improve the performance of our suppliers. As an early adopter of the Higg FEM tool, we have collected and reviewed FEM data of manufacturers since 2017. In 2023, 229 of our selected wet-processing manufacturers completed the Higg FEM assessment and had their data verified by third parties.

Safer Chemicals and Water Stewardship

At C&A, our goal is to foster a supply chain that continually expands the use of non-hazardous chemicals. One of our primary means of controlling chemicals across the supply chain is our longstanding chemical management program. It represents C&A’s comprehensive approach, which includes input, process, and output management. Our 2028 goal is that 100% of the chemicals used are approved safe chemicals¹.

INDUSTRY COLLABORATION

As one of the founding members of the Zero Discharge of Hazardous Chemicals (ZDHC) initiative, we have been working with other signatory brands to implement the ZDHC Roadmap to Zero framework since 2015. Thus, we adopt the foundation’s “clean factory” approach and promote the elimination of hazardous chemicals throughout the manufacturing process of all participating brands. Only in alliance with industry partners, including brands, NGOs, scientists, chemical suppliers, and manufacturers, can we move toward our vision of a complete shift away from hazardous chemicals. C&A has focused on co-developing industry standards, tools, and methodologies, for example to enhance the capabilities of the ZDHC Gateway portal, a global safer chemistry database. We also participate in other multi-stakeholder initiatives such as the AFIRM Group (Apparel and Footwear International RSL Management).

Our approach to safer chemicals

- Safer Chemicals: Identify safer chemicals, drive their adoption and eliminate use of hazardous chemicals.
- Smarter Processes: Assess and verify on-site chemical and wastewater management systems and practices.
- Better Outputs: Validate the elimination of hazardous chemicals to the environment and product.

CHEMICAL INPUT MANAGEMENT

C&A suppliers must source chemicals that meet ZDHC requirements. In practice, this means that chemical products are checked and tested against the requirements of the ZDHC Manufacturing

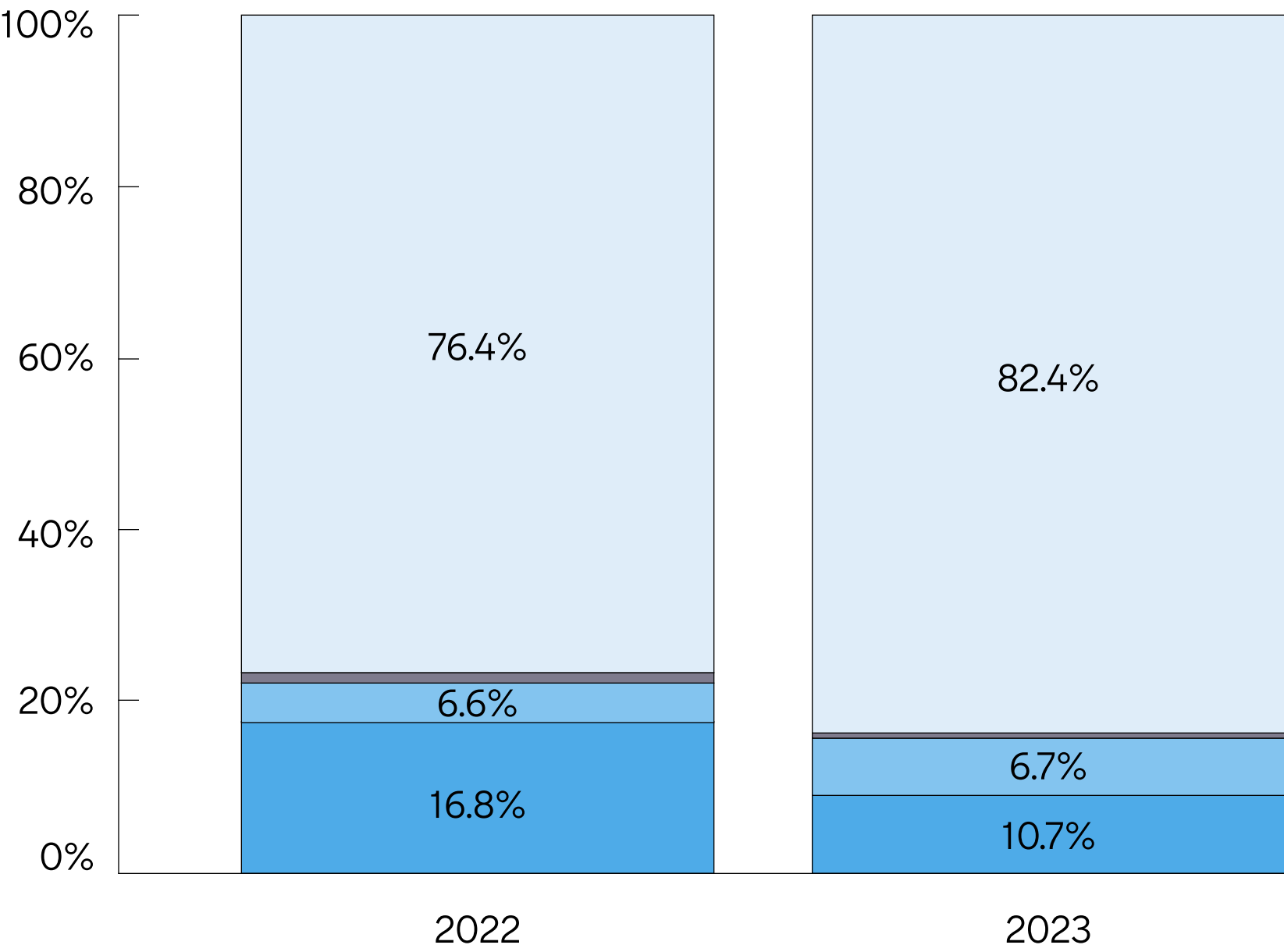
Restricted Substances List (MRSL), and the results are registered in the ZDHC Gateway. We track the chemical inventories of key suppliers using tools from service providers. This enables us to monitor in a timely manner the chemicals uploaded to the platform and the conformance of chemicals used by suppliers. We then assess the performance of participating facilities by making sure they meet our performance requirements for sustainable chemical management.

We review our suppliers’ monthly inventories, which enables us to increase transparency regarding chemicals use and determine whether chemicals conform with the latest MRSL. The average conformance rate for chemicals in our supply chain has increased from 83.2% in 2022 to 89.3% in 2023. As we aim for 100%, we continuously improve our supply chain and work directly with suppliers through our Environmental Stewardship

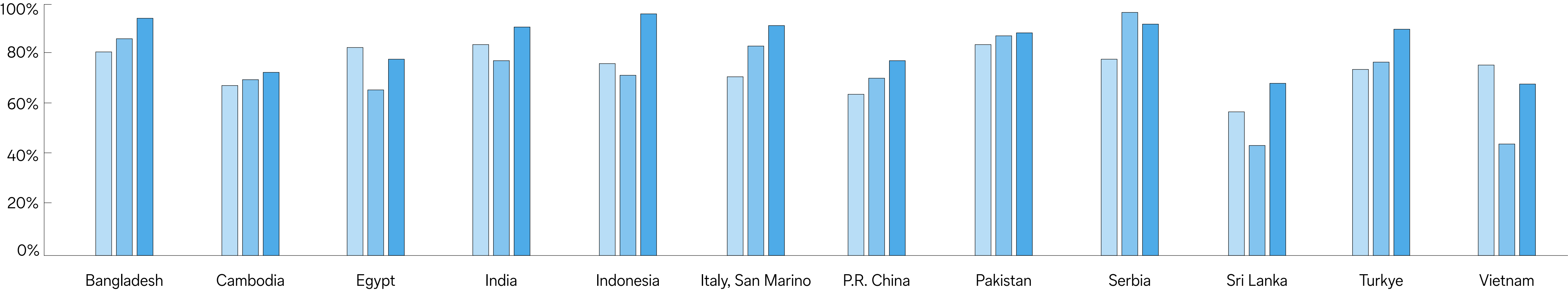
Team on the conformance of their chemical inventories. The MRSL Conformance Chart shows the distribution rate of the MRSL conformance level. Over 82% of participating suppliers have reached MRSL Level 3 conformance, the highest conformance level within the ZDHC chemical ranking. This continued progress can be attributed to the fact that we support our suppliers in switching to safer alternative chemicals and we require them to source ZDHC-compliant chemicals. We also monitor increasing MRSL performance in seven production countries: Bangladesh, Cambodia, China, Italy, Pakistan, Serbia, and Turkey. Thanks to the proactive engagement of our Environmental Stewardship Team, it is possible to closely monitor the suppliers’ MRSL conformance rates. The team immediately follows up with suppliers when performance levels slacken and works with them to define a corrective action plan.

MRSL
Conformance
by Level in
2022 vs 2023

- ZDHC MRSL v2.0/3.1 Level 3
- ZDHC MRSL v2.0/3.1 Level 2
- ZDHC MRSL v2.0/3.1 Level 1
- ZDHC MRSL v2.0/3.1 Non-Compliant¹



Average Conformance % by Country 2021–2023²

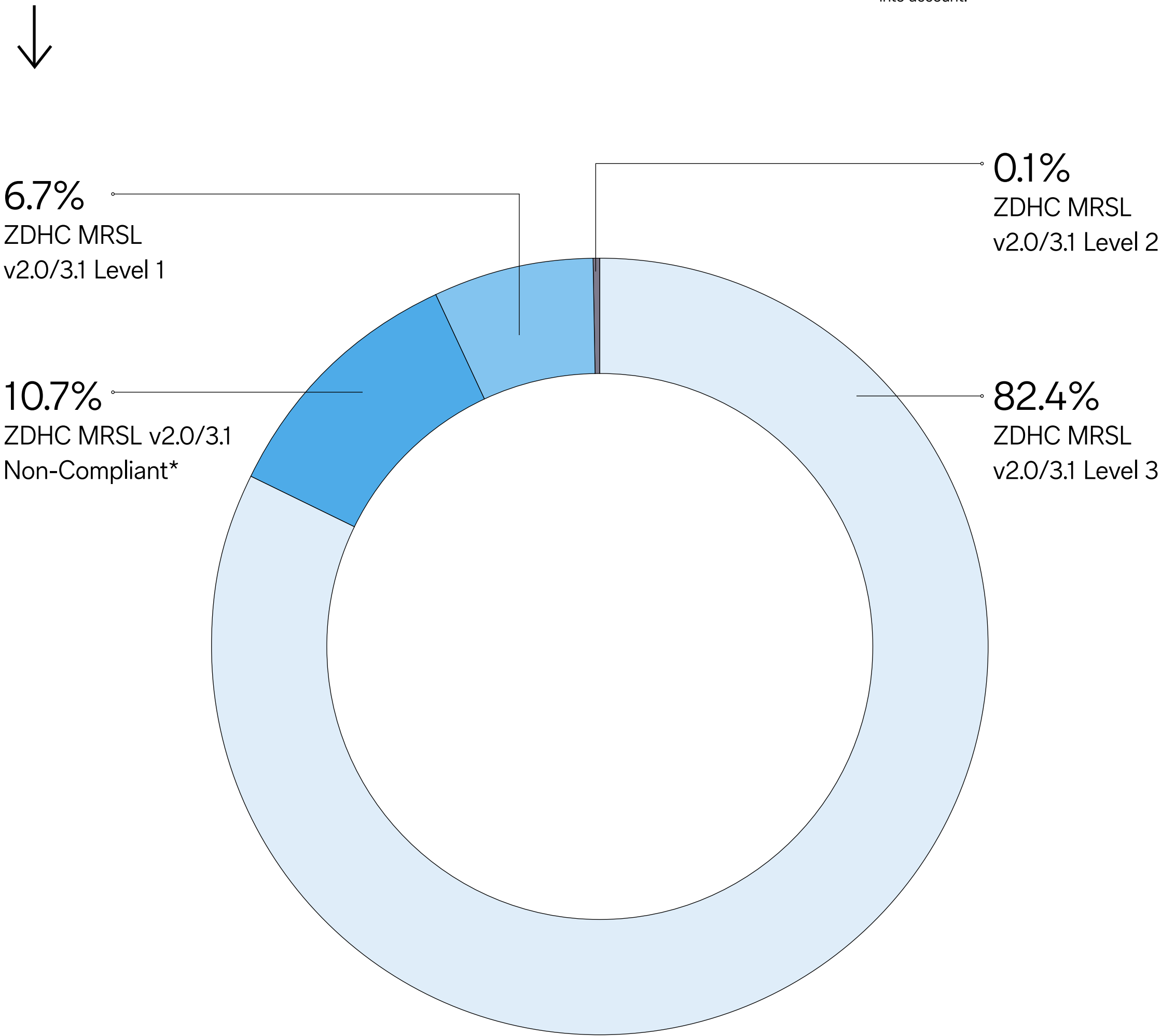


¹ Chemicals of status "ZDHC MRSL v2.0 Registered," "Not Evaluated," and "Evaluated as Non-Compliant" are included.

² The number of production units differ from country to country with the majority located in Bangladesh, P.R. China, and Turkey. There have been changes in the exact production units involved from 2022 to 2023.

ZDHC MRSL 2.0 & 3.1 Conformance 2023 (by Count of Chemical Products)¹

¹ The data are derived from January – December 2023 ZDHC Incheck reports of active production units, except in the cases where a production unit halted its operation or did not run any wet processes in a particular month, or where fewer than 12 months of data are taken into account.



Substances of Very High Concern (SVHC)

Articles produced for C&A must meet all European legal restrictions as well as all C&A chemical requirements. All suppliers to C&A are required to provide products that are REACH compliant, including compliance related to any Substances of Very High Concern (SVHCs).

As this is very important for both environmental and human health, suppliers may be required to provide further information to C&A to substantiate this compliance. Where suppliers are providing C&A with products that contain SVHCs at a quantity greater than 0.1%, there is a separate process in place requiring advance notification of our quality management team before any goods are shipped.

If it is decided that a SVHC should no longer be placed on the market, then it is placed on the Authorization list and a date assigned after which it can no longer be manufactured in Europe for sale. This date is called the “Sunset date.” C&A requires that all products supplied do not contain any substances on the Authorization list after the Sunset date.

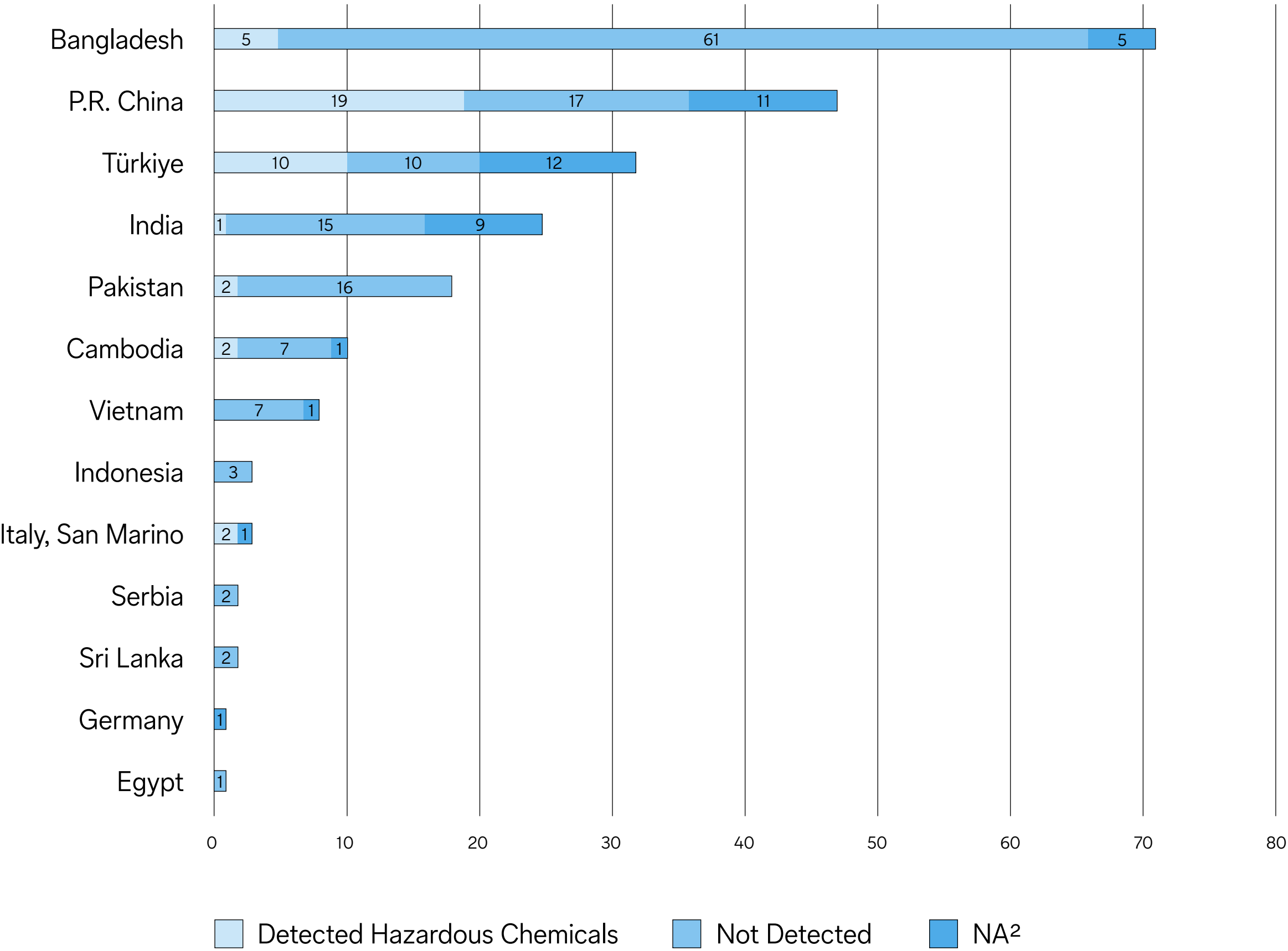
PROCESS MANAGEMENT

Process management is one angle we examine when it comes to chemical management. It is important that every factory, especially in tier 2 where most of the chemicals are used, has the staff with the right skill set and knowledge, procedures, tools, and expertise to safely use and handle chemicals in their daily operations. We also check whether suppliers implement adequate

policies and procedures for handling chemicals. This year, there has been a transition to the new version of Higg FEM with improved applicability and more comprehensive requirements for factories. C&A contributed actively in providing feedback to Higg developer Cascale (formerly Sustainable Apparel Coalition) and preparing factories to work with the updated topics. Additionally, we will continue to ensure our suppliers have systems in place in the following areas of chemical management:

- Tracing Methods: Methodologies to trace production chemicals from the manufacturing process to the chemical inventory on a monthly basis.
- Hazard Labeling: Chemical hazard labeling and safe chemical handling equipment.
- Safety Equipment: Adequate and functional protective and safety equipment as recommended by the Global Harmonization System Safety Data Sheet (or equivalent) in all areas where chemicals are stored and used.

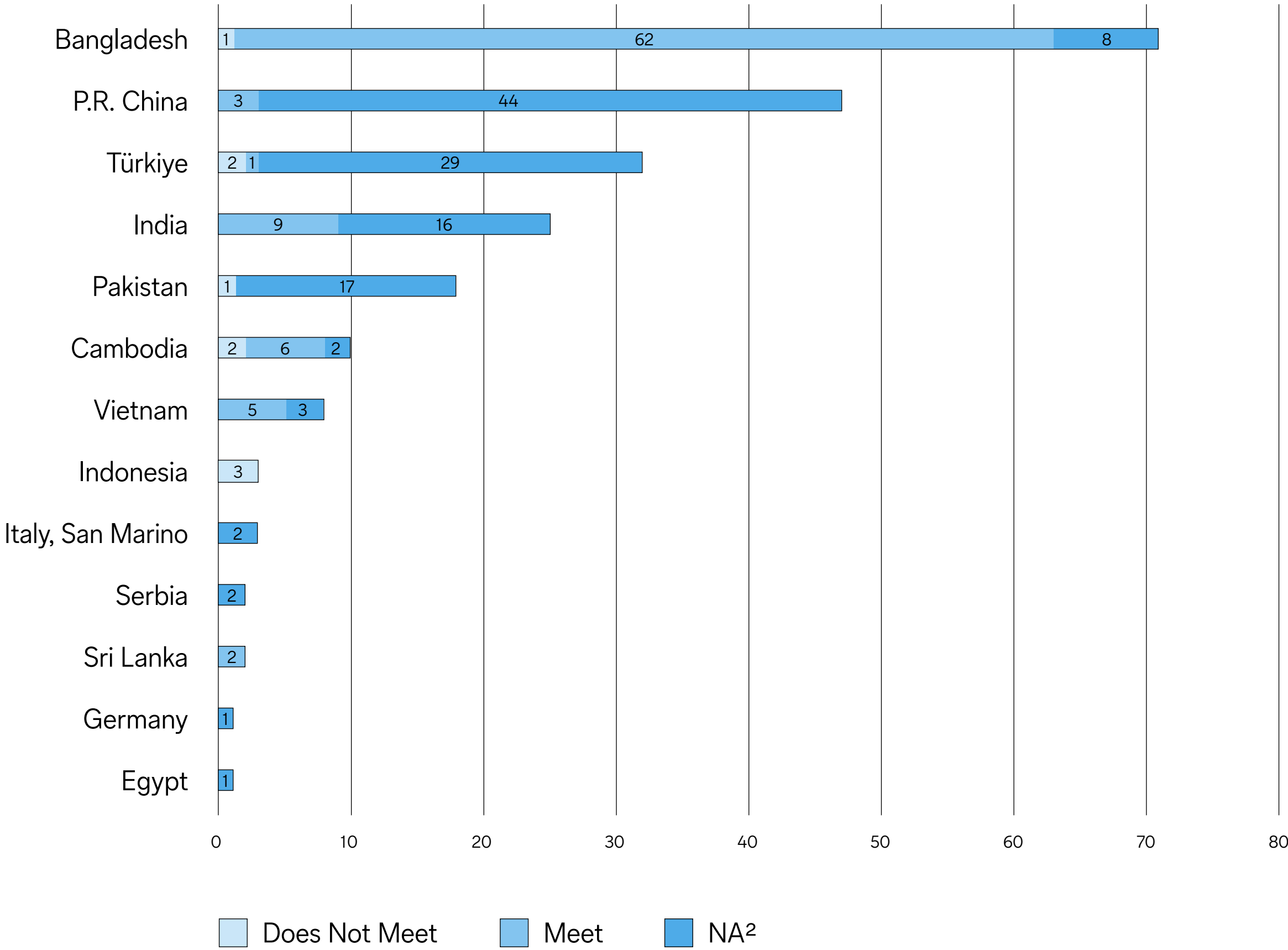
MRSL Chemical Detection in Raw Wastewater By Sourcing Country¹



¹ The sampling period for the data was November 2022 to October 2023. In case there is more than one wastewater test conducted during the reporting cycle, the latest valid report is taken into consideration, occasionally combined results of more than one report are considered when necessary. For the full list of parameters tested and the limits of foundational requirements please refer to ZDHC Wastewater Guidelines v2.1.

² NA refers to production units which are exempt from testing due to inapplicable discharge pathways, negligible amount of industrial wastewater generated, low business importance, or other reason(s) as approved by the ZDHC Foundation.

Foundational Requirements of Conventional Parameters, Metals & Anions in Directly Discharging Production Units by Sourcing Country^{1, 3}



³ There are in total 223 production units that participated in the ES Program, of which 97 directly discharge wastewater to the surrounding water bodies.

OUTPUT MANAGEMENT

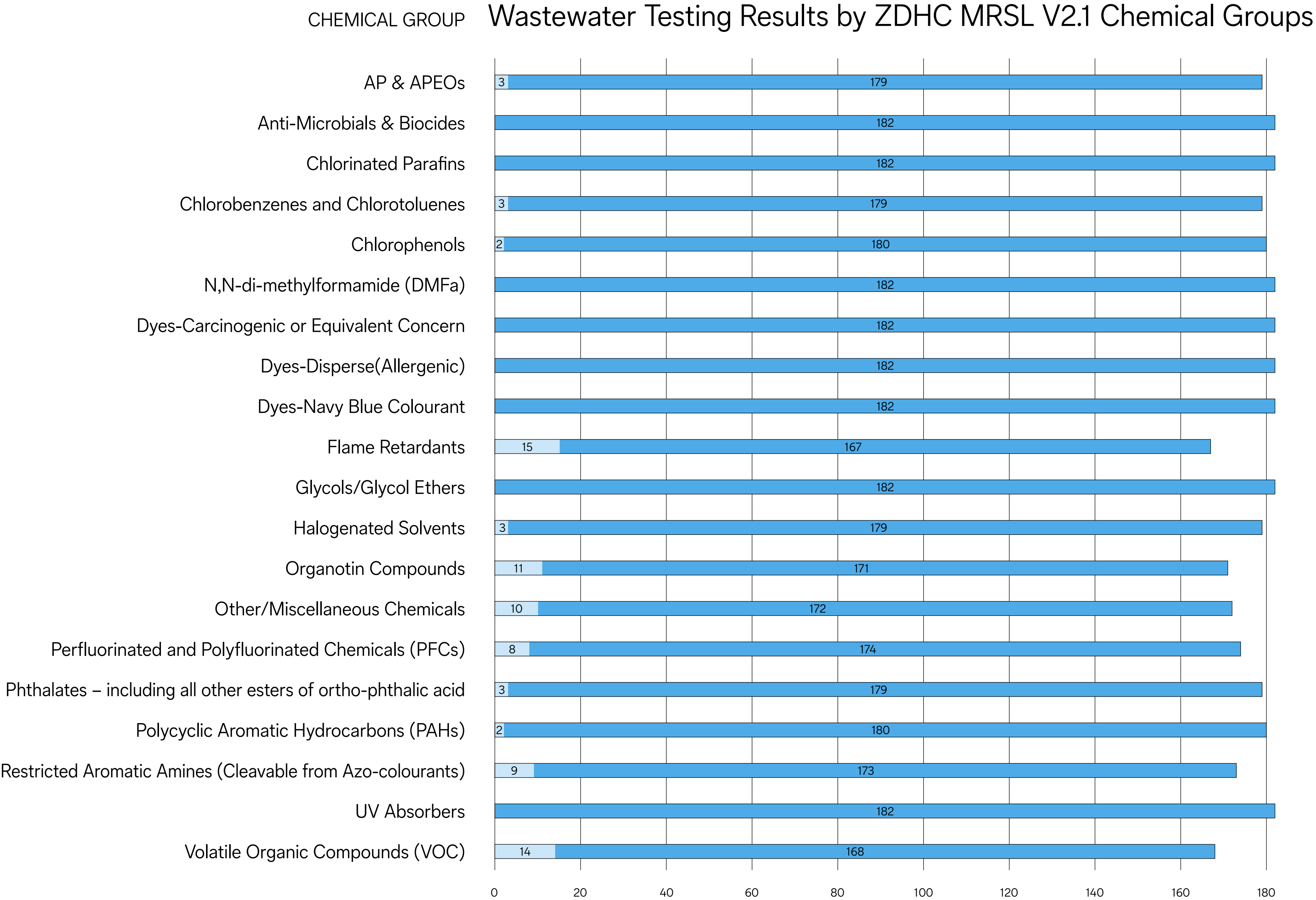
C&A is committed to publicly reporting progress in accordance with the ZDHC standards. As part of our chemical output management, we require annual wastewater testing at our suppliers’ production facilities according to the latest ZDHC wastewater guidelines to ensure clean water discharge. By testing raw wastewater for chemicals listed in the MRSL, we validate the elimination of hazardous chemicals at each facility. If a hazardous chemical is detected or if a facility has exceeded the foundational limit in any of the tested conventional parameters, metals or anions, a corrective action plan is initiated to find out the root cause for the detection.

We share best-practice examples to prevent this from recurring in the future. Wastewater sampling and testing was conducted from November 1, 2022, to October 31, 2023. Based on the annual wastewater testing results, in which 182 factories took part, 77% of sites have no MRSL chemical detection in their raw wastewater and 91% of directly discharging sites fall within the foundational limits of conventional parameters, metals, and anions as listed in the ZDHC Wastewater Guidelines v2.1.

Overall, there has been an increase in detection rate from the transition from ZDHC Wastewater Guidelines V1.1 to V2.1. We continuously support production units to find out the root causes of non-compliances and work on remediation.

This chart on the right illustrates which chemical groups may have more compliance challenges.

The source of data is the bulk wastewater data stored in ZDHC Gateway, with a few adjustments after cross-checking with the original testing reports. The tests were done according to ZDHC Wastewater Guideline v2.1.



Engaging Suppliers with Training

Chemical management requires expertise. We believe our success so far has been driven by thorough training and our dedicated team. Together with our learning technology partner, we developed a customized online e-learning platform to train our suppliers. This capacity building program covers many different areas, including resource efficiency, wastewater treatment plants, wastewater management, and root-cause analysis. It conveys the importance of chemical management and having the necessary infrastructure in place to reduce negative environmental impacts.

In 2023, we delivered these customized C&A courses on 17 environmental topics in English, Chinese, Spanish, and Turkish. The training was offered to 277 factory representatives responsible for environmental management at their sites, based on identified learning needs and relevance. We also held an in-person training in Bangladesh last October with 50 participants to strengthen capacity building and idea exchange on local best practices. The program not only provided suppliers with important training, but also improved their engagement with us. We plan to develop training on new topics and cater for more local needs in the future.

Reducing the Impact of Raw Materials

Minimizing chemical and water pollution during raw material production is a pivotal objective. Addressing

these concerns requires a multifaceted approach that integrates holistic practices. C&A has a long-standing commitment to promote organic cotton-based farming systems. Organic cotton is grown without synthetic pesticides and fertilizers, which makes for cleaner and safer waterways, healthier ecosystems, and reduced costs for farmers. Organic farming practices also enhance biodiversity and soil fertility. For almost 15 years, we have been working together with Cotton Connect toward this goal, and we will continue to do so going forward.

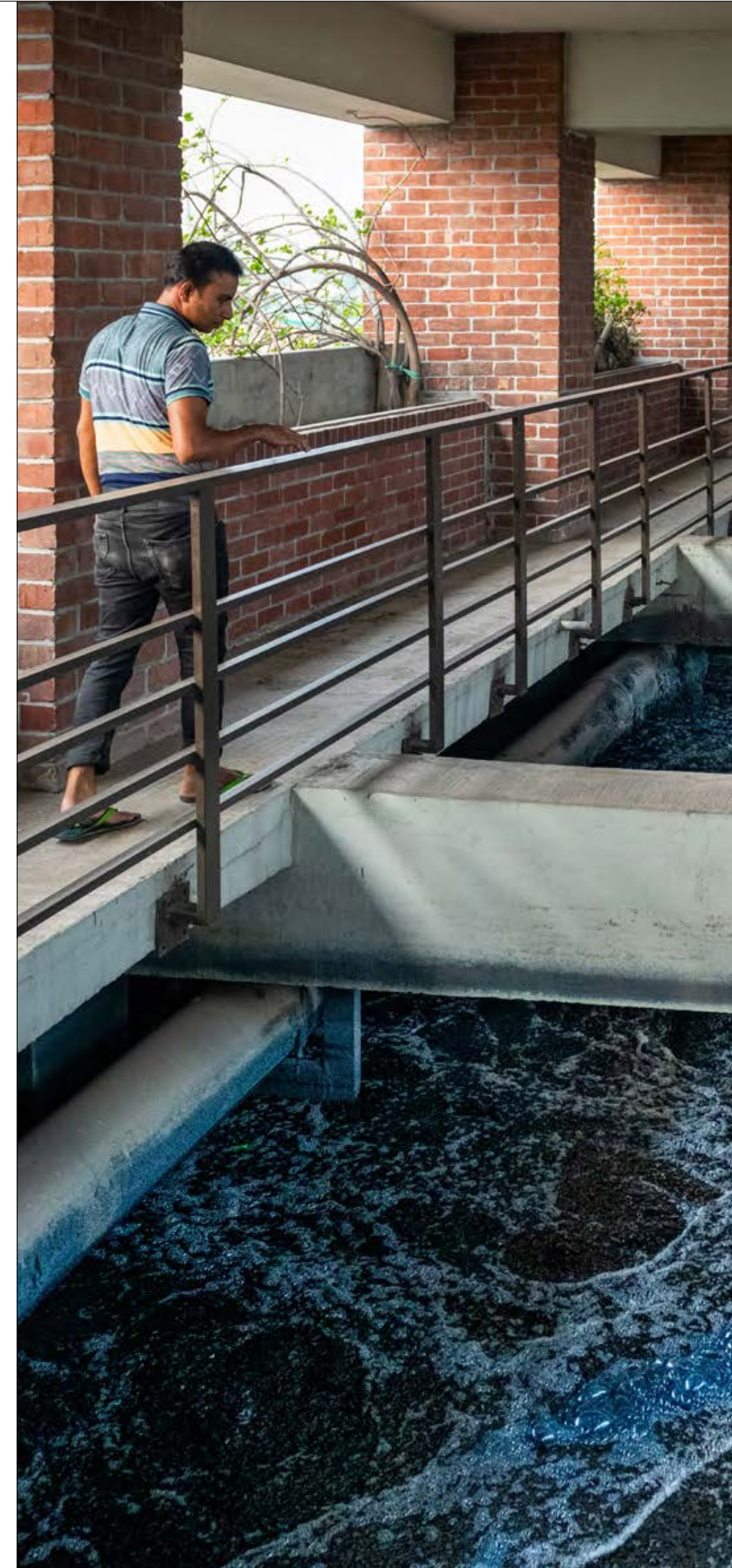
Since 2021, C&A has also been part of a five-year Partnership Initiative Organic Cotton in India. The Partnership Initiative is funded by the German Federal Ministry for Economic Cooperation and Developed and initiated by the Partnership for Sustainable Textile, GIZ, and the Organic Cotton Accelerator as well as other brand partners. The overall goal of the Partnership Initiative is to build a fair, environmentally friendly, and economically viable organic cotton supply chain. This will support significant savings on synthetic pesticide and fertilizer use compared to conventional farming. C&A continues to source in-conversion cotton from this project.

In 2023, C&A sourced cotton from the Regenerative Production Landscape Collaborative (RPLC) through our partnership with Organic Cotton Accelerator and Action for Social Advancement originally founded by Laudes Foundation, IDH Sustainable Trade Initiative, and WWF India. RPLC is a place-based approach that aims to create systems-level shifts to catalyze and scale a model where smallholder farmers grow agri-commodities using natural and regenerative farming

principals that restore natural resources and reduce emissions from farming systems. To further understand the impact of the main material we use, we are co-funding a life cycle assessment (LCA) study for cotton together with Textile Exchange and other global brands. This is to improve data quality and address data gaps in our industry. These studies will be finalized in 2025.

It is crucial to know where materials are coming from to better assess their impact. Therefore, Better Cotton Traceability was launched in November 2023. It was designed to give BCI members confidence they are sourcing product from a specific country and to establish greater supply chain visibility. We engaged with other industry leaders as part of the Better Cotton retailer and brand traceability panel to ensure farmers and farming communities can continue to access increasingly regulated markets. This year, we contributed our expertise on topics including driving demand for physical Better Cotton and supporting suppliers and teams through necessary changes.

The same approach is applied to all other materials. For polyester, C&A nominated fiber mills that adhere to our social and environmental standards. For regenerated cellulosic fibers, C&A uses the Connected platform to trace the origin of the products and ensure the integrity of our offerings.



Chemical Pollution *Targets*

The topic of chemical management is particularly significant for our industry, and our target aligns with the goals of leading industry initiatives:



For C&A production, 100% of chemicals used per production unit must meet the latest version of the ZDHC MRSL conformance level 1 or higher. In 2023 89% of chemicals used have met this target. This target is detailed in the C&A Environmental

Stewardship Manual. We have trained our key suppliers on this updated requirement. Progress towards the target on chemicals is mandatory and followed-up by the Sustainability Operations department, which includes the Environmental Stewardship Team.

Water

The textile sector is a significant water withdrawer, meaning that it extracts large amounts of water from natural sources such as rivers, lakes, and groundwater. At C&A, we use water at many stages of our value chain – from generation of raw materials (such as growing cotton) and wet processes in production to our own operations and customer use. Throughout the life cycle of our products, we need to think about water extraction, water use, and water discharge, as well as how our activities, and the activities of our partners, may impact human and environmental health.

Our suppliers can potentially release pollutants into nearby water sources, such as rivers, lakes, and oceans, contaminating water and affecting water quality and harming aquatic life. Our chemical management measures described above under "Safer Chemicals and Water Stewardship" aim to keep water free from harmful influences in production processes.

Cotton, a primary textile source, demands significant amounts of water. The consequences can include physical risks such as water scarcity in communities near manufacturing hubs, posing potential health risks and disrupting livelihoods, as well as disruptions in supply.

The functioning of offices, retail outlets, warehousing and logistics also use a substantial amount of water. That is why water is unmistakably a material topic for us. Pollution of water, water consumption, water withdrawals, water discharges, use of resources, and water and sanitation in our supply chain all appear on our list of material topics. More details on our double

materiality process, and how we engaged stakeholders to assess this topic, are available on [page 13](#).

Notably, within the DMA process we did not talk directly to affected communities, but we conducted a survey with stakeholders that represent these communities. Further, we had consultations with internal experts who are in dialogue with the affected communities. The results of these processes yielded valuable insights, and we are currently using them to set up policies that will govern water use in our operations and in our supply chain. We are currently revising our water target to bring it in line with the latest industry requirements. This includes measures to track water consumption along our supply chain, but also the use and management of water in our own operations. As a first step, we have started to collect water consumption data from our key factories. We will be able to report first numbers in the report for next year. Based on the results we will take the next steps to develop meaningful targets.

Microfibers

Tiny fibers are released from natural, synthetic, and man-made cellulosic textiles throughout their lifecycle. These fibers are commonly known as microfibers, fiber fragments, or in the case of synthetics, microplastics. As they make their way into the environment through various pathways, we are increasingly aware of their potential to harm ecosystems, wildlife, and human health, affecting everything from marine and freshwater systems to air and soil.

Since all types of fibers have some tendency to shed, understanding the full extent of their physical and

toxicological impacts is an emerging area of research. Therefore, it is crucial that our focus extends beyond just synthetic materials.

In February of 2023, C&A joined The Microfibre Consortium (TMC). TMC facilitates the development of practical solutions for the textile industry to minimize fiber fragmentation and release to the environment from manufacturing and the product life cycle. As a signatory of the Microfibre 2030 Commitment, C&A has been actively involved in testing and analysis. In 2023,, eight fabrics with varying material composition and structure have been tested. The results of this testing will help to inform future product R&D.

Biodiversity

Biodiversity is a cross-cutting topic that deals with protecting and regenerating ecosystems and supporting the healthy interactions among organisms that allow environments and nearby communities to thrive. The full impact of our industry on ecological systems, whether during raw material extraction or growth, during manufacturing, or even during product end of life, is something we are still working to understand. At this stage, our work on biodiversity links with our goals and actions in multiple areas of this report, including pollution, climate change, circularity, and materials.

Additional details on how we address each topic can be found as listed below:

- Organic cotton farming, [page 34](#)
- Regenerative farming, [page 34](#)
- Climate change mitigation, [page 25](#)
- Microfibers, [page 35](#)
- Water use, [page 29](#)
- Chemical use, [page 29](#)
- Sustainable materials, [page 44](#)
- Resource use and circular economy, [page 41](#)

Resource Use & Circular Economy Strategy

This section discloses information on the following material topics:
Use of resources, circular fashion, and waste management.



Resource depletion is a major global risk to people, the planet, and our business. As an industry we must reduce the quantity of resources we use to limit our environmental impact and protect natural systems. To achieve this, we need to shift from a linear to a circular economy, where products are designed to circulate.

We believe that by implementing circularity principles, we can achieve a long-term positive effect for our business and for our environment, which is why we are investing in lower impact materials and products, in training to integrate circular design in product development, and in testing new business models.

Products and materials not designed along circular principles might not be durable, reusable, repairable, or able to have a second life, which could lead to over-consumption of resources and excessive waste generation.

High energy consumption, wasteful practices, and unsustainable sourcing can increase production costs, making us less competitive. Environmental violations and reputational damage from unsustainable practices may result in legal fines and loss of customer trust, impacting revenue.

Companies that choose to sidestep the challenge of shifting to a more circular system will likely face resiliency risks if they continue to operate along a linear business model. As new regulations related to circularity emerge, businesses who are not on the leading edge could also face additional liabilities and penalties.

While transitioning to a circular system is imperative in our view, this change will bring significant logistical, financial, and technological risks and challenges as well. For example, our production processes rely on significant amounts of raw materials. Therefore, the highest concentration of risk is in the phase of raw material extraction. However, this step occurs in tier 4 of our value chain, meaning we have indirect influence over this phase at best.

Another consideration linking several of our top concerns together is that changing climate patterns will affect global crop production. Over-consumption further increases the use of resources. There is a potential risk that essential materials such as cotton and water

may become scarce and expensive. Limited availability, regulatory changes and market fluctuations can impact the availability and cost of these resources, posing risks to the clothing and textile business operations.

These risks must be carefully considered and managed as we make the necessary shifts toward a circular economy.

We also see multiple additional opportunities to promote a circular economy, such as:

1. Decarbonization of garment production through optimizing resource efficiency and decoupling material use from value creation,
2. Innovative design that provides additional functionality for products,
3. Collaborating among industry peers and partners to foster innovations that further enable a circular industry,
4. Attracting new customer groups,
5. Creating of new revenue streams through circular business models, and
6. Reducing of the impact of carbon and resource-related taxes.

In order to promote a harmonized approach toward working with circularity principles, we support the proposal for a new Ecodesign for Sustainable Products Regulations (ESPR), which will be the cornerstone of the European Commission's approach to more environmentally sustainable and circular products.

Stakeholder Engagement on Circular Economy

We used a consistent approach to identifying material risks, impacts, and opportunities related to resource use and circular economy as for the other topics.

Specific to the topic of circular economy, our internal stakeholders were part of the impact, risk, and opportunity assessment and participated in the Double Materiality Assessment process while external stakeholders were engaged via a survey. These external stakeholders included NGOs, multistakeholder initiatives, social enterprises, and service providers as those groups have been assessed as high priority.

This process helped us to solidify certain conclusions that continue to guide our strategy on circularity. For example, we know that our production processes rely on significant amounts of raw materials and natural resources such as water, land, and energy. And the production of synthetic materials such as polyester requires fossil fuels. We can reduce resource use by using more sustainable materials, implementing sustainable farming practices, and reducing our energy consumption.

At C&A, the following business units are involved in the processes around the mitigation of the topics mentioned above: our buying and design unit, our supply chain specialists, the packaging team, our sustainability department, and our facility management.



Progress Update

Use of Resources

Coming out of the materiality assessment, we have confirmed that our highest priority material resources are related to both our products and our packaging.



In terms of our garments, we have a particular focus on cotton, which this year made up 60% of our total materials sourced. It is associated with pollution in several important ways. In cotton farming, excessive pesticide & fertilizer use can contaminate soil, compromising its fertility and disrupting ecosystems. Soil degradation affects crop yields, impacting the livelihoods of farmers and food security. Chemical residues in soil can also leach into groundwater, posing health risks for nearby communities. Cotton is followed by polyester, which is our second most common

material at 20%, and then regenerated cellulosic fibers at 8%. We set ourselves the goal of achieving 100% more sustainable sourcing across all our core materials by 2028. By core materials we mean cotton, polyester & regenerated cellulosic fibers, which account for 89% of our materials. To us, a more sustainable material is one that has a reduced impact on the environment and society than conventional alternatives. Other materials we source more sustainably include polyamide, acrylic, wool, and cashmere.

Inflows

“Inflows” refers to the materials that we source and combine to create our products. The methodology used in calculating the data is based on material volume from direct measurement of the material weight of the outer material from our apparel products.

One way we optimize these inflows is to prioritize the use of more sustainable materials over conventional materials. We identify more sustainable materials using industry tools such as the Textile Exchange Preferred Fiber & Materials Index. We also require that 100% of the materials we source more sustainably are substantiated by third-party standards. This applies to certified organic and in-conversion cotton, cotton sourced through the Better Cotton Initiative, certified recycled polyester and nylon, and regenerated cellulosic fibers certified to the Sustainable Regenerated Cellulosic Content Standard.

Packaging presents a complex challenge because of how materials are sourced, applied, and then disposed of. Most of our plastic waste comes from transport packaging; this is also where our greatest leverage lies. We source our packaging materials primarily from the Far East, where they are manufactured and applied to garments. Looking ahead, we have set ourselves the ambitious goal of replacing 100% of our consumer-facing virgin plastic by 2028.

This goal applies to in-store virgin plastic packaging including hooks, polybags, strings (to attach labels on the garment), and size tapes. It also applies to virgin transport plastic packaging such as foil used to protect

FIBRE MIX	Fibre weight (mt)	Share of fibre (%)
Cotton	43,521.00	60.01%
Polyester	14,729.90	20.31%
MMC	6,215.90	8.57%
Polyamide	3,294.00	4.54%
Acrylic	1,321.50	1.82%
Elastane	1,066.90	1.47%
Polyurethane	666	0.92%
Linen	662.3	0.91%
Wool	337.5	0.47%
Non-Textile	197.1	0.27%
Stretch	149.7	0.21%
Cashmere	120	0.17%
Leather	90.2	0.12%
Polypropylene	44.4	0.06%
Polyolefin Elastomer	22.5	0.03%
Metallic Fiber	19.1	0.03%
Other Fiber	61.20	0.09%
GRAND TOTAL	72,519.20	100.00%

the garments during shipment from manufacturing regions to the EU. Online plastic packaging, such as polybags to protect the garment for online orders from our customers, also falls under this goal. This encompasses polystyrene (PS), polypropylene (PP), and polyphenylene ether (PPE).

Paper packaging is another material we are addressing, and we have published an ancient and endangered forest policy. As of early 2024 we joined the Canopy Pack4Good initiative and we are committed to using only recycled, Forest Stewardship Council (FSC) certified paper, or next generation solutions by the end of 2025. “Next generation solutions” refers to using materials traditionally considered waste to deliver low-carbon alternatives to virgin tree fibers. This helps take pressure off forests, stabilize our climate, and protect biodiversity. An example of this could be creating packaging from waste agricultural residues like wheat straw, hemp, and flax that are typically burned in fields after harvest.

Currently, the paper packaging used in transport is mainly virgin wood-based paper, and paper packaging in stores is mainly FSC certified.

Outflows

“Outflows” refers to the products we make and sell. C&A is a European omnichannel fashion retailer selling ready-to-wear fashion at an affordable price for the whole family including apparel, accessories & non-textile products. C&A's key product groups on the market are tops, followed by bottoms and underwear. Womenswear

is the biggest division followed by kids and menswear. We carefully incorporate leading methodologies and tools to create more circular products. C&A has been an industry leader in the introduction of Cradle to Cradle Certified® products since 2017. Cradle to Cradle (C2C) means a product is designed so that its materials and components can be repurposed or recycled. The standard includes requirements on Product Circularity, but also on Material Health, Climate & Clean Air, Water & Soil Stewardship and Social Fairness.

Waste

At C&A, we are committed to taking actions to prevent, eliminate, or minimize our overall waste. The monitoring, handling, and categorization of waste plays a crucial role in our transition to a circular system.

We have information available for a limited number of waste streams in our own operations. Collecting accurate, relevant, and verified data across all our waste streams is a challenge because we depend on numerous parties for this information. We recognize that we are not yet at the level we aim to be. To gain a holistic view of how we manage waste in our own operations, and to comply with the new regulations, we continue to develop a waste management approach that examines governance structure, strategies to enhance and standardize our waste collection, tracking and monitoring procedures, and data accuracy for all the waste streams we handle. This will help us to set a sufficient baseline, develop a target and track progress towards this target. Regarding the waste hierarchy, our top priority is the elimination of waste, which is

RECYCLED VOLUME & SHARE		Fiber weight (mt)	Share of fiber (%)		
Recycled Cotton		383	0.53%		
Recycled Polyester		3,807	5.25%		
Recycled Polyamide		32	0.04%		
Recycled Acrylic		15	0.02%		
Recycled Wool		9	0.01%		
Recycled Cashmere		2	0.00%		
GRAND TOTAL		4,249	5.86%		
TOTAL WEIGHT OF PACKAGING (MT)		2020	2021	2022	2023
TOTAL PLASTIC		1,471	1,407	1,404	1173
Distribution and transport		728	705	756	687
E-Commerce Polybags		546	506	451	335
Stores		197	196	197	151
CARDBOARD / PAPER		10,522	9,561	10,672	9033
TOTAL WEIGHT OF PACKAGING		11,993	10,968	12,076	10,206
TOTAL WEIGHT OF RECYCLED PLASTIC PACKAGING 2023		Weight (mt)	Share (%)		
E-Commerce Polybags, 100% recycled		117	34.9		

why we are prioritizing waste prevention and reduction opportunities in our own operations. In addition, we monitor, reduce, and recycle plastic packaging, cardboard, and paper. Learn more about our initiatives related to cardboard packaging on [page 39](#) and virgin plastic elimination on [page 43](#).

Improved forecasts for our purchasing and merchandising operations enabled us to further optimize our assortment planning over the year. This led to a reduction in unsold merchandise from 904 metric tons in 2022 to 755 metric tons in 2023. Unsold merchandise as well as customer returns are partly resold and partly donated. Returned products that cannot be reused are processed according to our waste policy, which is based on the EU waste hierarchy.

Furthermore, in 2023 our We Take It Back program, including the online collection program Packmee, collected a total of 968 metric tons of used textiles. Customers in France, Germany, and Spain can directly send unwanted garments from home to TEXAID through Packmee. Of the items collected in our stores, 72% were reused locally where possible, 22% were recycled, and only 6% could not be reused or recycled. Energy recovery is only used if the clothes can no longer be used for hygienic reasons or because they are too heavily soiled.

VOLUME OF NON-HAZARDOUS WASTE (MT)	2020	2021	2022	2023
TOTAL PLASTIC	1,471	1,407	1,404	1,173
Distribution and Transport	728	705	756	687
E-Commerce Polybags	546	506	451	335
Stores	197	196	197	151
TOTAL CARDBOARD / PAPER	10,522	9,561	10,672	9,033
TOTAL TEXTILE WASTE	2,229	1,969	2,169	1,723
We Take It Back	917	1,030	1265	968
Unsold merchandise and customer returns	1,312	939	904	755
TOTAL HANGERS	1,946	1,962	1,895	1,653
TOTAL VOLUME OF NON-HAZARDOUS WASTE (MT)	16,168	14,899	16,140	13,582
TEXTILE WASTE DIVERTED FROM DISPOSAL DUE TO PREPARATION FOR REUSE & RECYCLING (%)		2021	2022	2023
We Take It Back				
Reuse		75%	756	687
Recycling		20%	451	335
Energy Recovery		5%	197	151
WASTE DIVERTED FROM DISPOSAL DUE TO PREPARATION FOR RECYCLING (MT)		2021	2022	2023
Plastic in Distribution and Transport		705	756	687
Cardboard / Paper		9,561	10,672	9,033
Hangers		1,962	1,895	1,653

Actions

We are taking a number of actions, and working with leading partners and innovators, to promote a circular fashion system and to ensure efficient resource use. These are detailed more below.

Recycled Raw Materials

One focus area is on increasing the use of recycled raw materials. Actions here include:

1. *SECURING MARKET ACCESS TO NEW, INNOVATIVE VISCOSE SOURCES.*
In 2023, we started tests with innovators such as Circulose® and Evrnu®, which offer technology aimed at recycling used cotton textiles into a feedstock for yarns like viscose and lyocell. We also engaged in a new generation wheat straw trial for regenerated cellulosic fibers. This was initiated by Canopy, a nonprofit organization dedicated to protecting the world's forests, species, and climate, and Laudes Foundation to reduce the reliance on virgin wool pulp and find ways to tackle the issue of farmers burning their agricultural waste.
2. *ASSESSING COMMERCIAL READINESS OF RECYCLED POLYESTER FROM TEXTILE WASTE.*
We are in the third year of our Fashion for Good Collaboration to scale post-consumer polyester recycling. First results are expected by the end of

2024. For this project, we partnered with Arvind, Teijin, Cure, Syre and Revalyu to cover the full value chain. We see textile-to-textile recycling solutions such as chemically recycled polyester as a key enabler to closing the material loop and reducing virgin resource consumption. This project will help us all to understand the barriers, impacts, and opportunities in the chemical recycling of polyester.

3. *ESTABLISHING A SOURCE OF POST-INDUSTRIAL WASTE (PIW) COTTON FROM C&A GARMENT PRODUCTION.*
C&A has worked with Reverse Resources since 2022 with the intent to trace more waste from our suppliers to recyclers such as Recover™. Our collaboration with Reverse Resources remains and we now have more than a dozen facilities traced on the Reverse Resources platform. C&A has been one of the most successful actors of the Circular Fashion Partnership to onboard suppliers to the platform. During the last year, we noticed strong pressure from local waste handlers on suppliers remains. C&A has been actively engaging with suppliers, as well as local waste handlers, to facilitate an open dialogue between all parties. On the Reverse Resources Platform, C&A has access to all data from suppliers while minimizing their added workload. The Reverse Resources Platform gives access to statistics including suppliers, waste volumes and composition, colors, disposal methods of suppliers, and deliveries to recyclers.

Circular Design Principles

Specific to the application of circular design principles, we are taking the following additional steps:

1. *IMPLEMENTING A CIRCULAR DESIGN TASKFORCE TO DRIVE ACCOUNTABILITY AND LEVERAGE EXPERTISE*
C&A created an internal Circular Design Taskforce composed of quality, design, merchandising, and sourcing representatives. Their task has been to collectively define and align on which additional circular design strategies we should explore and implement. As a result of this process, we identified that two circular design strategies will be developed: Design for Durability and Design for Recyclability. From our perspective, these two design strategies are the most important to implement because they focus on a) making sure our clothes are durable and fit for their purpose, and b) ensuring once they reach the end of their life, they can be recycled within today's current recycling industry capabilities.
2. *PRODUCT DURABILITY*
As with circularity, at the moment there is no alignment regarding durability standards in the fashion and textile industry. Therefore, we continued to contribute our time and expertise to actively support the EU Product Environmental Footprint (PEF) technical working groups to drive the development of this framework and work towards a harmonized, science-based method to calculate environmental impact on a product level. This methodology will serve the entire European market,

regardless of the size and scale of the brand. Additionally, during 2023, the quality team increased support for C&A's QEI (Quality Enhancement Initiative) where we continued to enhance durability and extend the lifetime of our products.

3. *PRODUCT RECYCLABILITY*
For design for recyclability, C&A has worked with our sorting partner TEXAID to understand what can or can't be recycled today, according to the recycling capabilities in Europe. Based on this study, we have defined the C&A Design for Recycling Criteria looking at all elements influencing recyclability such as fabric composition, printing, embellishments, coatings and finishes, trims, and more. C&A is a member of the Ellen MacArthur Foundation's Network, and the Foundation also supported this process with a review of the criteria. This would be applicable to apparel products only and will have to be revised frequently to reflect the speed of development within the industry. The new Design for Recycling Criteria will be implemented in product development processes through a pilot before roll-out in 2024. In addition to the establishment of the criteria, we have seen a growing awareness internally about the strategic relevance of this information in a fast-evolving regulatory landscape.
4. *EMBEDDING CIRCULAR DESIGN THINKING ALIGNED WITH THE C&A CIRCULAR DESIGN STRATEGY WITHIN PRODUCT TEAMS*
This process was strengthened over the year with training sessions hosted by circular.fashion (p. 43). The Berlin-based company has developed a comprehensive framework for Circular Design

Strategies, empowering retailers worldwide to embrace sustainable practices. The trainings, attended by 50 designers and buyers, showcased the power of circular design principles in the fashion industry and gave C&A teams the opportunity to practice applying new strategies to existing C&A products.

5. *POSITIONING C&A IN RELEVANT INDUSTRY PROJECTS PROMOTING CIRCULAR DESIGN*
C&A joined the Circular Design Consortium in October 2023, which also includes H&M, Zalando, ASOS and Bestseller. The objective of the group is to drive alignment and efforts around circular design in the industry. In addition, C&A closely engaged with the task force working to create version 4.1 of the Cradle-to Cradle Certified® standard. These updates will help to overcome current barriers of version 4.0 and promote scalability of the certification.

Implementing Circularity into our Business Practices
Further actions have been taken to support the application of circular business practices. This year these actions have included:

1. *IDENTIFYING POTENTIAL CIRCULAR BUSINESS MODELS AND EVALUATING EXISTING C&A CIRCULAR BUSINESS MODEL PILOTS*
Out of the four circular business models defined by the Ellen MacArthur Foundation, we have identified resale (giving access to secondhand garments) as one of the most interesting business models to engage with to answer new customers’ needs. C&A continued to test physical sections featuring secondhand solutions in five stores with our partner

Carou. These varied between 15 and 40 square meters in size, and provided women's wear in five stores and men’s wear in two stores. Our objective is to offer both C&A and non-C&A branded garments in store, providing a convenient secondhand shopping experience. We have established a strong partnership with Carou and are working collaboratively to optimize our customer experience. For 2024, we are aiming to increase the number of stores offering secondhand garments in collaboration with Carou.

2. *CREATING AN UPCYCLED DENIM LINE*
After a successful collaboration in 2022 with E.L.V. DENIM, C&A has launched a second collection to promote the REMAKE business model. E.L.V. DENIM designed a second line created from post-consumer denim waste that was manufactured with Makers Unite.

Waste Prevention

WASTE HIERARCHY
Another example of our action on promoting a circular economy and efficient resource use is our optimization of waste management in line with the waste hierarchy. All our service providers need to follow our waste guideline, which is based on the EU waste hierarchy, which is (in order of prioritization):

- I. *PREVENTION*
- II. *RE-USE*
- III. *RECYCLE*
- IV. *ENERGY RECOVERY*
- V. *DISPOSAL*

The waste hierarchy is particularly relevant for our unsold merchandise and We Take It Back program. Other actions we are taking on waste prevention include the following:

1. *ENGAGING WITH SUPPLIERS TO ADDRESS WASTE*
C&A participated in the Circular Fashion Partnership led by the Global Fashion Agenda. One valuable takeaway from this collaboration was a better understanding of the business case for manufacturers to collect, sort, and trace their textile waste. We also gained a clearer perspective on the current challenges they are facing. This data was gathered from our manufacturing partners using surveys. Additionally, in line with the Circular Fashion partnership, C&A has continued our work with Reverse Resources to trace waste materials from garment manufacturers.

2. *DESIGNATING TEXTILE COLLECTION POINTS*
In 2018, C&A introduced the We Take It Back used clothing collection initiative. With the assistance of textile collection, sorting, and recycling specialist TEXAID, we have launched our We Take It Back program in nine European countries. Under this program, customers can return used clothing from any brands for resale and recycling at our retail locations. Furthermore, we offer our online collection program Packmee in Germany and France, and beginning early this year, in Spain, allowing our customers to send used clothes from home by post directly to our service provider, TEXAID. For the coming year, C&A is working to expand the program to more countries.

The European collection and sorting industry is set to undergo significant changes due to new EU regulations mandating textile waste collection by 2025 and national extended producer responsibility laws. At C&A, we are committed to continuously improving our We Take It Back program to support circular fashion principles, reduce waste, and comply with upcoming laws. We are actively exploring innovative solutions and collaborating with partners who share our goal of promoting reuse, recycling, and responsible disposal of textiles to build a circular economy.

3. TESTING AND IMPLEMENTING ALTERNATIVES FOR VIRGIN PLASTIC PACKAGING

Bio-based and home compostable hooks

We are implementing programs aimed at avoiding plastics entirely and we are currently exploring bio-based and home compostable alternatives. In 2023, we had a successful pilot project with the bio-economy start-up traceless materials. This pilot resulted in a bio-based and home compostable alternative for single-use plastic hooks in our store in Hamburg Altona.

Recycled Polybags in E-Commerce

Polybags are used to protect clothing and shoes during transport and storage. We expanded the use of 100% recycled plastic for the polybags in our online business. We introduced recycled polybags in China and India in addition to Bangladesh, which accounts for 70% of our online market. More countries will follow. We are also actively replacing virgin plastic polybags used for our e-commerce shipments with 100% recycled polybags.

Testing Home Compostable Polybags

C&A participated in Fashion for Good’s Home Compostable Polybag Project, evaluating home-compostable online polybags in our supply chain. These innovative bags, developed by TIPA Corp. and Greenhope, incorporated bio-based materials as substitutes for traditional plastic polybags. The bio-based materials underwent rigorous performance testing for essential attributes such as transparency, durability, and longevity. This testing was crucial

to ensure these materials met the performance standards required in supply chains, comparing bio-based materials against conventional plastics. While initial results were promising, scaling these compostable bags for widespread home use presented challenges. Functionality, environmental impact, cost, and infrastructure readiness were all critical aspects evaluated during the project.

Key Learnings

- **Balancing Bio-based Content:** Achieving the optimal balance between reducing bio-based content for transparency and maintaining sustainability goals was a complex yet crucial endeavor.
- **Packaging Efficiency:** Ensuring garments were packed tightly addressed challenges like barcode scanning without compromising packaging integrity, enhancing operational efficiency.
- **Compostability Requirements:** Properly perforating polybags for compostability and avoiding non-compostable materials such as adhesive tape was vital to preserving their eco-friendly credentials.
- **Waste Management Challenges:** Addressing insufficient waste infrastructure for polybag disposal underscored the urgent need for improved recycling and composting facilities.

Circular Economy Collaboration

Finally, we know that the structural change we are trying to achieve will depend on collaborations and partnerships across all levels of our industry. We are committed to promoting collective action to increase circularity in products and materials. A small selection of examples includes the following:

- As a founding member of Fashion for Good, C&A is actively engaged with the global initiative. Through a sector-wide collaboration, we are aiming to scale innovation, support research, and adopt good fashion practice. C&A supported previous projects such as Sorting for Circularity Europe and currently Sorting for Circularity – Project Rewear.
- We have a long-term partnership with TEXAID for our We Take It Back program.
- Carou (a subsidiary of TEXAID) is our provider for second-hand garments in five retail stores in Germany and has collaborated with our design teams to create our recycling definition.
- We are continuing our four-year partnership with Recover™, a leading materials science company and global producer of low-impact, high-quality recycled cotton fiber and cotton fiber blends. Recover™ takes textile waste and recycles it with minimal use of solvents or water, closing the loop on fashion.
- We are in a collaboration with the members of the Technical Secretariat of PEF in several working groups. C&A has been specifically involved in providing an updated Physical Durability Protocol which is an ambitious but scalable approach for the industry, as well as providing recommendations for extrinsic durability.
- We have a collaboration with Eco Intelligent Growth and Cradle to Cradle Products Innovation Institute to define pathways to make the standard for C2C certified® Version 4.1 easier and more scalable for the fashion industry. C&A is an active member of the C2C Certified® community and the Apparel, Textile, and Footwear user group and provided extensive feedback to further develop the only standard for certified circular products.

- We partner with industry organizations such as Cotton Connect, The Organic Cotton Accelerator, and Textile Exchange to source more sustainable materials.
- We are an active member of the Ellen MacArthur Foundation.
- We are part of the Circular Design Consortium, which is working to accelerate impact and foster consistency across the industry. We are working with Asos, H&M group, Zalando, and Bestseller on circular design using the Ellen MacArthur Foundation's vision of a circular economy for fashion as a basis.

Case Study

C&A partnered with the Berlin-based company *circular.fashion*, which has developed a comprehensive framework for circular design strategies and aims to empower retailers worldwide to embrace sustainable practices. *circular.fashion* hosted training events attended by 50 designers and buyers which showcased the power of circular design principles in the fashion industry. Different teams worked together to rethink various C&A products based on circular design principles. The creativity and innovation shown by the teams was remarkable as they reworked men's formalwear jackets, women's underwear, linen trousers, cardigans, outerwear jackets, denim, t-shirts, baby clothing, and more.

Targets

There are four strategic targets we have established that are aligned with our overall circular economy ambition. None of these four targets are considered to be mandatory under current legislation; rather, these are the priorities we have set internally based on our own goals for our company and our industry. They are related to sustainable materials, circular products, plastic elimination, and animal welfare and are aligned with optimizing materials, optimizing resource inflows and outflows, and minimizing waste. By 2028, we are aiming to achieve the following targets:

- Sustainable Materials: 100% of our core materials are more sustainably sourced (focus on inflows).
- Circular Products: Seven out of 10 of products comply with a circular design principle through the way they are designed, produced, and re-used (focus on waste, inflows and outflows).
- Plastic elimination: 100% elimination of virgin plastics in our stores, e-commerce, and transport packaging (focus on waste inflows and outflows).
- Animal welfare: 75% of our core animal-based materials are certified according to defined animal welfare standards (focus on inflows).

Each of these targets is detailed further below.

Sustainable Material Target

At C&A, we are aiming to be an industry leader in increasing the use of more sustainable materials.

C&A is working with others to foster organic cotton farming and build capacity for textile recycling, focusing on our core materials. We are also improving traceability and bringing next-generation materials to market – these are materials of the future that use alternative feedstocks or cutting-edge production processes compared to what is available on the market today.

OUR APPROACH

Our approach to our sustainable materials target is centered on responsible sourcing and on innovation. C&A supports a shift in the way our core materials are grown or processed. We recognize that there are limitations to the sustainable materials available at scale, and we are committed to working with others in the apparel industry to research, pilot, and scale innovative and more sustainable alternatives. Our current focus is on advancing material traceability.

We set ourselves the goal of achieving 100% more sustainable sourcing across all our core materials by 2028. By core materials we mean cotton, polyester, and regenerated cellulosic fibers, which account for almost 90% of our materials.

HOW WE DEFINE AND CONFIRM MORE SUSTAINABLE MATERIALS

We define a more sustainable material as one that has less impact on the environment and society than its conventional counterparts. We evaluate materials using industry tools such as the Textile Exchange Preferred Fiber & Materials Index. We also require that 100% of the materials we source more sustainably are substantiated by third-party standards. This applies to certified organic and in-conversion cotton, cotton sourced through the Better Cotton Initiative, certified recycled polyester and nylon, and regenerated cellulose certified to the Sustainable Viscose Chain of Custody Standard.

METHODOLOGY & ASSUMPTIONS

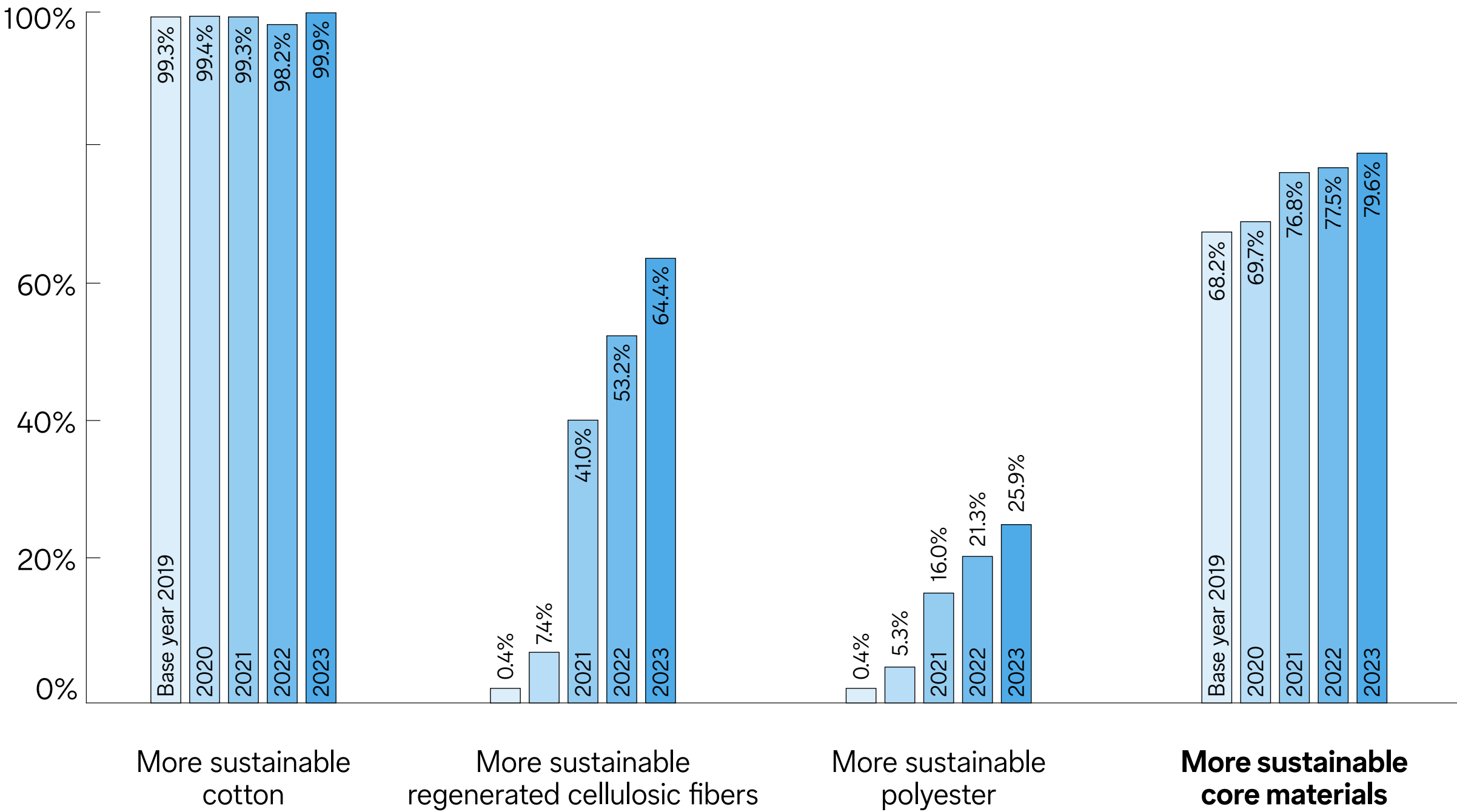
The total material volume calculation is based on industry standards for calculating fiber tonnage published by the Textile Exchange. The calculation considers main fabric only. Product weight is multiplied by a dedicated factor per product category to account for main material weight only. In addition, the material volume is an indication of fiber volume in end products, not fiber procured from material production level, considering supply chain wastage.

PROGRESS

Overall, we are in line with our target as we were able to increase the share of more sustainable core materials by 2.7% in comparison to the previous year. In 2023, we sourced almost 80% more sustainable materials. However, we also acknowledge the pace of uptake slowed down due to ongoing challenges of quality and price.



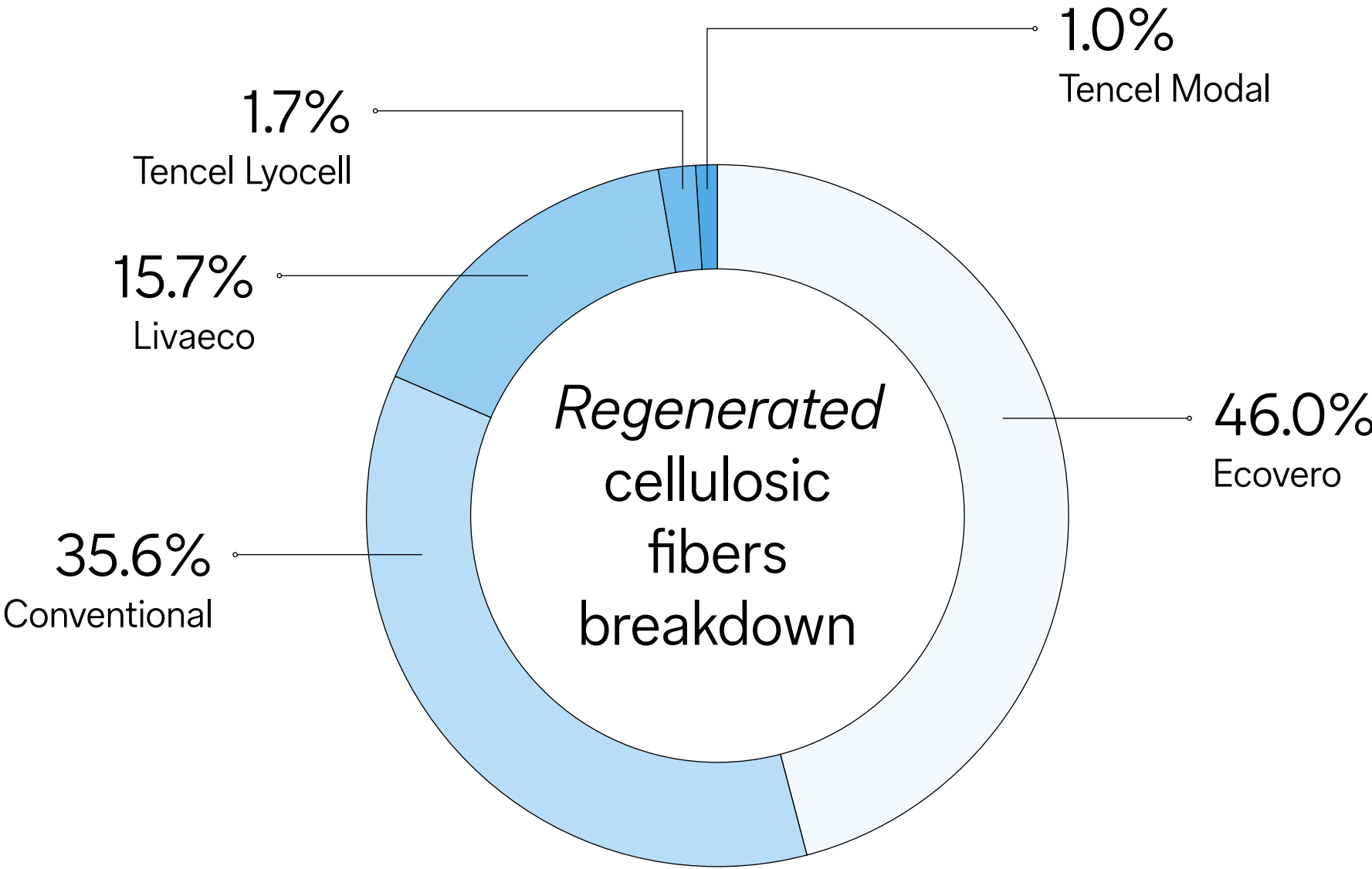
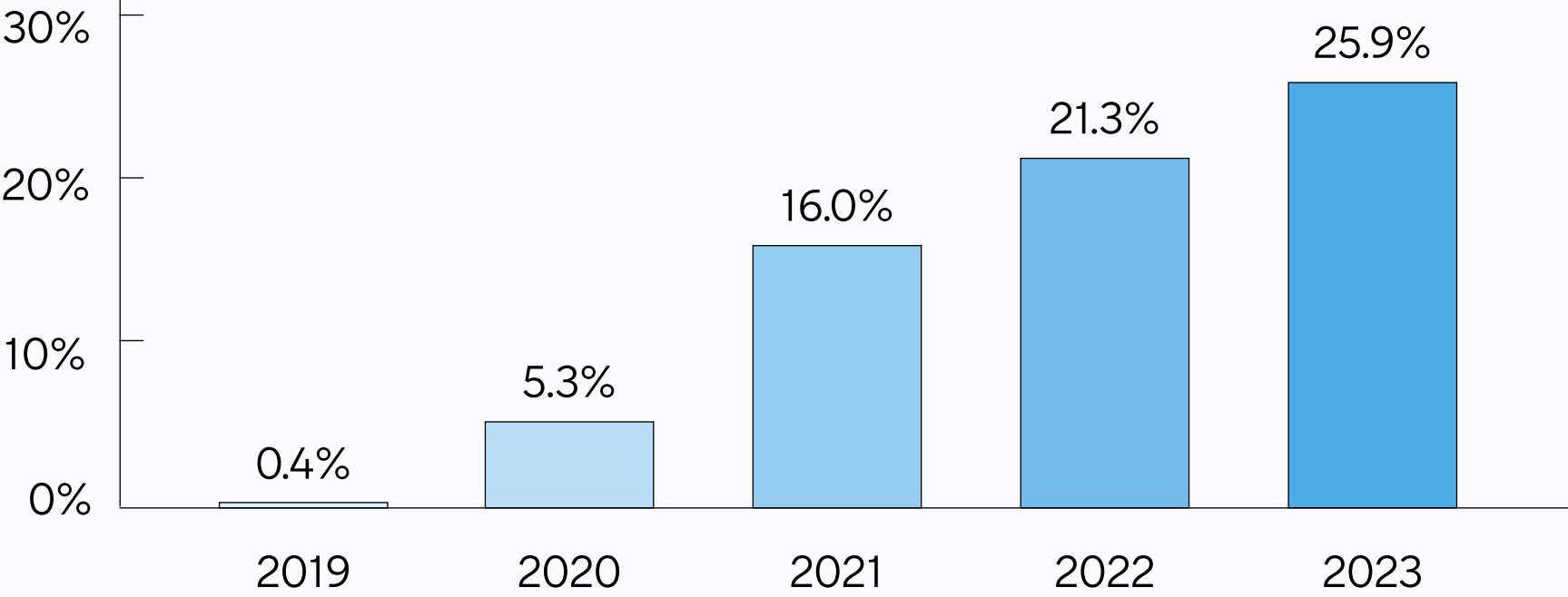
More sustainably sourced core material



MORE SUSTAINABLE COTTON ¹	2019	2020	2021	2022	2023
Better Cotton (BCI)	63.3%	52.8%	54.7%	66.0%	68.7%
In-Conversion Cotton			1.6%	5.7%	4.9%
Organic Cotton	36.0%	46.5%	42.8%	25.7%	25.5%
Recycled Cotton		0.3%	0.4%	0.9%	0.9%
GRAND TOTAL	99.3%	99.6%	99.5%	98.3%	99.9%

¹ conventional cotton makes 0.06%. Due to rounding of decimals, sum appears to be 100%

Recycled polyester share



Circular Product Target

At C&A, we set ambitious targets to move towards a circular fashion system. By 2028, seven out of 10 products shall comply with a circularity principle. Our strategy is based on integrating recycled materials into our products, adapting the design of our products to a circular economy, and also testing and scaling viable circular business models. Here we consider the challenges in the collection, automatic sorting, reprocessing, and recycling of textiles. With this in mind, we aim to design and manufacture products that can be reused, remanufactured, or recycled, and keep the products in use for as long as possible.

OUR APPROACH

C&A’s Circularity Strategy relies on the three principles of a circular economy of fashion defined by the Ellen MacArthur Foundation:

- 1. Made from safe and recycled or renewable inputs:
At C&A, we want to use materials that are free from hazardous substances and that are decoupled from the consumption of finite resources.
- 2. Made to be made again: C&A products are to be designed and manufactured in such a way that they can be reused, remade, and recycled.
- 3. Used more: C&A wants to support and develop business models that extend product life such as re-use.

METHODOLOGY & ASSUMPTIONS

A product counts toward the product goal if it meets one of the following criteria:

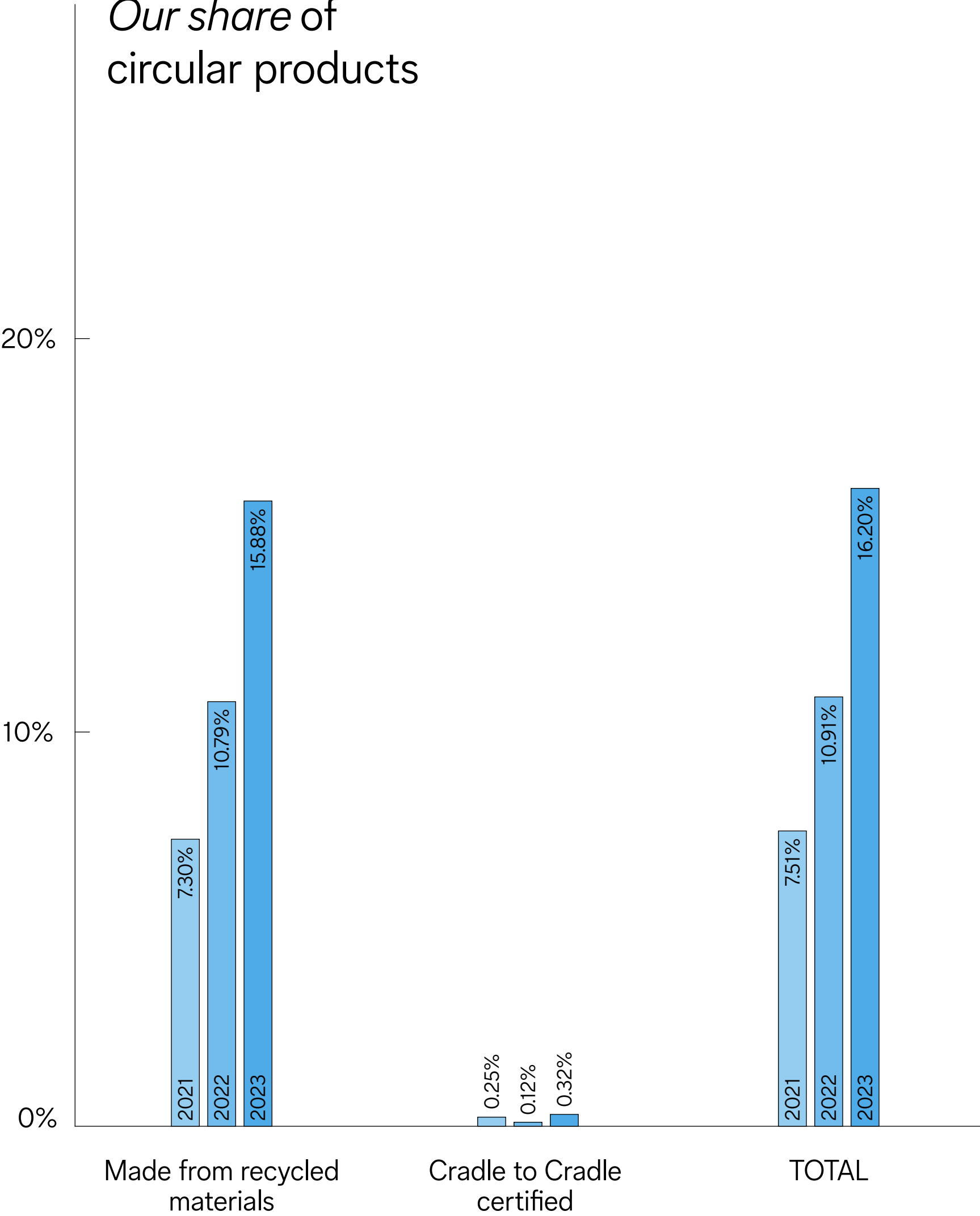
- 1. It integrates recycled materials; minimum percentage should be 20%. In the case of a product which has multiple recycled inputs, it is still only counted once.
- 2. It has a circular design; here we are currently counting the number of products that are C2C certified®; design for durability and recyclability are not yet accounted for.
- 3. It is sold through a circular business model.

For any product that has multiple attributes, this product will still only account for one product toward our goal of seven out of 10 products. Imbedded within this approach is a reduction in primary raw materials through the increase of recycled materials. There is no dedicated volume target for the adoption of recycled materials. Increasing recycled materials is an integrated part of our overall material target

PROGRESS

We increased the share of products which comply with circularity principles. After the drop in 2022 for C2C certified®, we were able to increase the number in comparison to the previous year’s level. For the first time, we launched a C2C certified® babywear collection including a body, a set, and a blanket. When looking at recycled materials, we made a leap and increased the overall share of products made with recycled material by 5%. Nevertheless, we acknowledge that we are still far behind our target of seven out of 10 products by 2028. Achieving this goal may require the integration of further circular design standards, such as design for durability and recyclability.

Our share of circular products



Plastic Elimination Target

At C&A, we are committed to reducing plastic pollution by eliminating 100% of single-use virgin plastics in our stores, e-commerce, and transport packaging by 2028.

OUR APPROACH

C&A’s plastic elimination strategy focuses on viable solutions to avoid using virgin plastic. This includes embracing and developing recycled materials and innovative alternatives. We prioritize the incorporation of recycled content into our packaging and product components to reduce our reliance on virgin plastic production and minimize environmental impact.

We are also investing in research and development to create and adopt innovative alternatives to conventional plastics, such as biobased and home compostable alternatives.

METHODOLOGY & ASSUMPTIONS

Our 2028 plastic elimination strategy follows a structured hierarchy:

- 1. Avoid/Reduce: We strive to minimize plastic use wherever possible.
- 2. Reuse: We promote reusable alternatives to single-use plastics.
- 3. Replace: When plastic use is unavoidable, we replace it with recycled plastics, and search for compostable or bio-based alternatives.

PROGRESS

We continued our commitment to reducing single-use plastic usage across our operations, with an overall reduction of 36.25% versus the 2019 baseline. Significant achievements were made in these key areas:

Distribution and Transport: We achieved a reduction of 69 metric tons of plastic, a decrease of approximately 9% from the previous year.

E-Commerce: Our e-commerce operations saw a substantial reduction of 116 metric tons of plastic polybags, which translates to a 26% decrease compared to 2022. In 2023 we replaced 35% of virgin polybags with recycled content polybags.

Stores: We were able to further reduce the volume of plastic in store by 23% compared to the previous year.

DATA ON THE RIGHT

2019 baseline has been re-calculated following an updated methodology
Distribution and transport: includes single-use virgin plastic used to transport bulk products from production to distributing countries
E-commerce polybags: includes single-use virgin plastic used to protect indiviual products during transport and for shipment to costumer
Stores: includes single-use virgin plastic on product items such as packaging or size tapes

PLASTIC REDUCTION PROGRESS	2020	2021	2022	2023
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TOTAL PLASTIC (VOLUME IN MT)	1,471	1,407	1,404	1,173
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Distribution and Transport	728	705	756	687
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E-Commerce Polybags	546	506	451	335
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Stores	197	196	197	151
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Animal Welfare Target

We want to source animal-based material as thoughtfully as we source all of our more sustainable materials. In our C&A Sustainability Strategy, we defined the aim of ensuring animal welfare throughout our supply chain. Our goal is to source 75% of our core animal-based materials from sources certified according to defined animal welfare standards by 2028, with a special commitment for 100% certified cashmere.

C&A has a long-standing commitment to animal welfare, as outlined in our Animal Welfare Policy. We expect our supply partners to abide by the internationally accepted concept of the Five Freedoms ([p.81](#)). Under no circumstances will we accept any materials from exotic, threatened, or endangered species as defined by the CITES agreement and the IUCN Red List. Our approach to ensuring this is based on improving traceability from the farm to the final product.

In 2023, almost 30% of all animal-derived products have been certified to a third-party standard, including the Responsible Down Standard and Sustainable Fibre Alliance.



Social *Information*





“*Social Information*” is a broad area encompassing several material issues for us. These include the unique concerns related to our own workforce, to workers in the value chain, and to our consumers and end users. Our strategy and actions related to each of these groups is described here, along with a more in-depth look at the topics of transparency, data privacy, and social inclusion.

Throughout these various subsections, there are multiple references to our Human Rights and Equity Policy, for example in the “Own Workforce” section as well as the “Consumers and End Users” section. This policy is presented from multiple lenses depending on the topic at hand. Similarly, other critical policies such as the C&A Code of Conduct for suppliers and business partners will be presented in multiple sections but from differing perspectives.

Our *Own* Workforce

Our 2023 Double Materiality Assessment (DMA), was preceded by a thorough human rights risk analysis focusing on our own workforce. This process has enabled us to identify and understand the potential impacts, risks, and opportunities (IRO) related to our own workforce. We have ensured a robust approach by leveraging authoritative indices and reports on human and labor rights, supplemented by internal expert insights and feedback from independent civil society experts.

Through this analysis, we have identified several potential material impacts on our workforce in the following areas: working conditions (adequate wages, work time, work-life balance), health and safety, equal treatment (gender equality, training and skills development, diversity, and harassment at the workplace). These are each detailed further throughout this section.

Strategy

All C&A employees and non-employees in our workforce who can be materially impacted were included in the scope of the human rights risk analysis and the materiality assessment.



The types of employees and non-employees under the scope include office staff such as administrative personnel, managers, and support staff; store and district management responsible for overseeing retail operations; permanent and temporary sales assistants working in retail stores; subcontracted staff hired through third-party agencies; trainees including apprentices and interns; permanent, temporary, and subcontracted warehouse logistic workers in distribution centers; workers responsible for the

transportation of goods; and sourcing staff involved in procurement operations and support. Most of C&A’s European retail markets are in low or medium-risk countries for human rights violations. However, several groups remain vulnerable due to sector-specific risks or systemic inequities. In contrast, most of C&A’s sourcing countries are at high risk for human rights violations. Despite this, the risk of grave human rights abuses, such as child labor and forced labor, is low due to the nature of our workforce in Asia.

Systemic potential adverse impacts include:

- Working hours and work-life balance challenges: These remain a concern in retail and logistics, particularly during peak seasons. This issue is driven by industry-wide labor shortages, high staff turnover, and the less flexible scheduling demands inherent to the nature of work.
- Lower wages for entry-level distribution center and retail positions: The retail sector faces the challenge of offering competitive wages, especially in the context of the current cost-of-living crisis. Entry-level positions are primarily affected.
- Health and safety: The physical demands and fast-paced environment typical of the retail and distribution sectors increase the risk of workplace accidents.
- Discrimination and harassment: These issues stem from societal inequalities and divisions, while the fear of stigma and retribution may exacerbate the challenges. Common risks increase in the context of diverse and temporary workforce across countries.

Company-specific actual adverse impacts included reports of individual incidents regarding working hours and work-life balance challenges, health and safety, discrimination, and harassment. These are detailed further in the coming sections.

Positive impacts entail creating a more supportive and equitable work environment at C&A and addressing key material concerns for our workforce. Fostering these enhances employee well-being and promotes a culture of respect, fairness, and inclusion in a safe work environment. This includes, in particular:

- Efforts to improve working hours and work-life balance: We critically review scheduling practices and engage outsourced employees, especially during peak seasons. Additionally, we offer well-being and resilience tools to our corporate employees.
- Enhanced health and safety measures: Each C&A country organization has a responsible staff member, a health and safety officer, or a designated committee. They oversee regular inspections and monitoring to ensure occupational health and safety. Our role-specific training focuses on protocols applicable to employees’ specific roles and gives them the essential knowledge and skills to ensure their safety and that of others.
- Livelihood support: The retail sector makes a significant impact in providing jobs for people who may find it challenging to secure employment elsewhere. Regular salary reviews, along with structural and merit-based increases – both voluntary and resulting from collective bargaining agreements (CBA) where applicable – support financial stability for C&A employees.
- Strong anti-discrimination and anti-harassment commitments: We promote respect and equitable treatment through robust policies which help to prevent and remedy all forms of discrimination and harassment. We take decisive action when incidents do happen. These measures aim to support employees of all genders, identities, and walks of life to thrive and reach their full potential at C&A.

Addressing the material risks and opportunities associated with our workforce is crucial for C&A’s long-term success and being proactive helps us future-proof our business for generations to come.

Extended working hours, poor work-life balance, and lower wages may present significant risks in the sector, linked to high turnover, low morale, reduced productivity, difficulty in attracting talent, and increased recruitment and training costs. By proactively addressing these systemic challenges, we aim to enhance employee satisfaction and attract and retain skilled workers of all backgrounds and identities. Such efforts are aimed to result in a more stable and committed workforce, improved productivity, and a strengthened reputation as a desirable employer in the fashion retail industry. Poor health and safety practices, along with discrimination and harassment, pose risks of increased insurance costs, legal liabilities, loss of productivity, and reputational damage. By mitigating these risks and promoting a culture of respect and equality, we work to reduce incidents, improve well-being, and foster a positive work environment. This work can differentiate our company as a safe and truly inclusive workplace and an employer of choice dedicated to equity.

For C&A, addressing these material topics is an ethical obligation that can help us uphold our commitment to doing what is right. Ultimately, consistent work on these topics can also drive business success through a positive culture and work environment.

As C&A shifts toward more sustainable operations, roles at our company may evolve. Some positions may restructure in the future to align with new operational practices, but this transition will also unveil fresh opportunities. Employees will have the chance to acquire skills essential for the future of work, fostering career advancement. Commitment to our environmental goals will continue to prompt adjustments in corporate

practices. This shift may generate new roles in sustainability management, environmental compliance, and innovation.

Consistent with challenges throughout the industry, C&A has identified several more vulnerable groups within our workforce, including temporary and subcontracted sales assistants, trainees, and logistics workers. Women and underrepresented groups may confront barriers stemming from historical and cultural biases, affecting their career progression, workplace satisfaction, and overall well-being.

In particular, temporary and subcontracted workers often lack the protections afforded to full-time employees. Trainees may face pressure to prove themselves and receive lower wages or benefits compared to regular employees. Logistics workers, due to the nature of their work, may face safety hazards. Historically, women have faced gender-based discrimination in promotion opportunities, workplace expectations, and pay. They may also be vulnerable to sexual harassment. People from underrepresented ethnic and racial groups, LGBTI+ people and people with disabilities may encounter systemic biases, including unconscious bias in hiring, promotion, or task allocation. They may also experience exclusion in teams.

While these challenges may not materialize at C&A, we know that if we are not intentional in preventing them, we risk reinforcing societal inequalities. In our policies and daily practice, we uphold our pledge to continuously monitor, prevent, and mitigate risks to contribute to a fairer labor market and a future where no one is left behind.

How Our *Human Rights and Equity Policy* Supports *Our Own Workforce*

At C&A, we set forth our fundamental commitments to our workforce within a comprehensive Human Rights and Equity Policy. This policy addresses labor practices, including working conditions, health and safety, and our stance on non-discrimination. By integrating these commitments into a single, detailed policy, we ensure a holistic and cohesive approach to human rights and equity within our operations.

The Human Rights and Equity Policy describes C&A’s pledge to respect human rights and actively prevent, mitigate, and remediate any potential negative impact on people. It is based on international standards and highlights the importance of stakeholder engagement and respecting the rights of children, women, and historically marginalized groups.

Key principles include:

- We prohibit child labor, forced labor and labor exploitation, all forms of harassment, discrimination, and corruption;
- We respect freedom of association and the right to collective bargaining;
- We put consumer health and safety front and center;
- We respect reasonable working hours and wages;
- We commit to equity, promoting fairness in process and result;
- We respect privacy and protect personal data;
- We respect the right to a clean environment.

The policy respects and aligns with multiple third-party standards and initiatives, including:

- UN Guiding Principles on Business and Human Rights
- International Bill of Human Rights
- UN Global Compact
- ILO Declaration on Fundamental Principles and Rights at Work
- OECD Guidelines for Multinational Enterprises

Additionally, the policy is guided by specific conventions for the protection of women and vulnerable groups, such as the UN Convention on the Elimination of Discrimination against Women, the UN Convention on the Rights of the Child, and the ILO Violence and Harassment Convention. We adhere to international human rights standards even when local laws fall short, seeking alternative ways to uphold these standards wherever we operate.

The Human Rights and Equity Policy applies to all C&A employees, including interns, temporary workers and leased workers. The most senior level in our organization accountable for the implementation of the policy is the European C&A Management Team (as of 2023, referred to as Leadership Team, or LT). LT is responsible for considering potential human rights impacts related to business decisions. Oversight and monitoring of compliance and due diligence processes are entrusted to the Human Rights Governance Council, which includes senior leaders that operate independently and without instruction, as mandated by the CEO.

The purpose of the Human Rights Governance Council is to monitor C&A human rights and environmental risk management.

- This includes:*
- Monitoring of the annual and event-related risk analyses.
 - Monitoring implementation of appropriate preventive measures.
 - Monitoring corrective actions when risk analyses reveal actual or imminent violations of human rights or environmental risks.
 - Establishing and maintaining a complaint and whistleblowing procedure, the C&A Fairness Channel, and effective case handling according to established rules.

Additionally, the Council is responsible for reporting annually to the CEO and the CFO, as well as highlighting critical compliance issues to relevant company departments. The Council is also tasked with proposing necessary improvements to our due diligence processes. The Human Rights & Equity Policy is publicly available on the corporate website in multiple languages. For our employees, it is published in our internal Policy Hub in all the languages of our retail markets. An instructional article on the policy is published on our intranet. Additionally, in 2023, the policy was communicated separately to all managers via email, encouraging shared ownership and proactive implementation.

As a company, we hold ourselves accountable to respect human rights and ensure fair labor practices. This commitment is not only our responsibility as an employer, but it also relies on the actions of each employee to prevent and report violations. Only together with our co-workers can we maintain a workplace culture rooted in human rights, respect, inclusion, integrity, and ethical behavior.

Alignment with our *Code of Ethics and Conduct*

Our Human Rights and Equity Policy is anchored by a rigorous Code of Ethics & Conduct, which outlines our stance on a range of legal, ethical, and operational topics and delineates the key behaviors and norms we expect. The Code is the cornerstone of our culture, shaping how we treat one another and navigate issues that may impact society, both directly and indirectly. This Code emphasizes individual responsibility, conscientious decision-making, and our collective impact. It sets the standards to ensure that rights and fairness are integral to our daily business and that abuse is effectively prevented, reported if it occurs, and addressed.

The Code was introduced in fiscal year 2023 (January 2024) and has been rolled out to all employees through a communication campaign featuring members of the Leadership Team, extending into fiscal year 2024 (June 2024). An engaging, storytelling-based learning program for all employees supported the delivery of the Code. While the full program was mandatory for corporate employees, selected parts of the Code were also required for our frontline co-workers in retail and logistics. This included modules on compliance with the law, respect for human rights, equity and inclusion, preventing harassment, violence, and abuse, and raising concerns or whistleblowing at C&A.

Following the launch of the Code, it is prominently displayed at all locations. New employees receive a summary, and those with access to the C&A Academy are automatically enrolled in the learning modules.

Stakeholder Engagement

C&A is committed to actively engaging with our workforce to inform decisions and manage actual and potential impacts on them. By engaging in meaningful dialogue with our co-workers and their representatives, we uphold our human rights commitments and ensure our efforts have the intended positive impact. The perspectives of all workers, including women and groups that are particularly vulnerable or marginalized, are important to us in shaping company decisions and activities. While we have made the first steps in these areas, we recognize that more needs to be done to elevate and prioritize the diversity of voices within our workforce.

- We engage our co-workers both through direct interaction and through workers’ representatives. This occurs at multiple stages:*
- Regularly, through scheduled social dialogue meetings with works council representatives, surveys, and focus groups.
 - On an ad-hoc basis, during specific projects or changes affecting the workforce.
 - Continuously, via accessible grievance channels.

In June 2023, our Co-workers Information and Consultation Forum (CICF) transitioned to a European Works Council (EWC). Co-workers in each C&A country had the opportunity to elect an employee representative in the Works Council based on well-defined procedures anchored in local legislation.

The Social Relations and Employment Law Department of the People & Culture Division is responsible for liaising with the EWC and other social partners, ensuring an open and constructive dialogue with worker representatives. The Equity, Inclusion, and Human Rights Department promotes the inclusion of underrepresented groups’ concerns and needs in business and people considerations, and fosters respect for human rights.

Progress Update

Our Human Rights and Equity Policy translates into concrete stances on how we approach the material concerns related to our own workforce.



OUR STANCE ON WAGES:

We are committed to providing our employees with adequate wages that, at a minimum, meet the basic needs of individuals and their dependents, allowing for a discretionary income for a modest but decent standard of living.

OUR STANCE ON WORK TIME:

All employees have the right to reasonable working hours, which do not exceed 48 hours per week, with statutory holidays and at least one day off per week. Overtime is permitted only as an exception, and we



respect employees’ right to disconnect to maintain a healthy work-life balance.

OUR STANCE ON HEALTH AND SAFETY:

We take measures to prevent occupational illness, injury, and accidents while promoting a healthy work climate. We provide regular health and safety training and ensure safe working conditions. We will remove employees from duties when there is an imminent risk to their health and safety. They also have the right to walk off the job due to urgent safety hazards.

OUR STANCE ON GENDER EQUALITY AND EQUAL PAY FOR WORK OF EQUAL VALUE:

We are dedicated to gender equity, including in pay. We commit to evaluating equity in outcomes for employees of all genders and taking action to close pay gaps.

OUR STANCE ON DIVERSITY AND EQUAL TREATMENT AND OPPORTUNITIES:

We are committed to equal treatment and opportunities for all employees and workers, regardless of age, disability, gender identity, sexual orientation, ethnicity, race, nationality, religion, socio-economic background, or any other dimension of identity. We support affirmative action to ensure equal opportunity and strive to create an inclusive work environment.

OUR STANCE ON WORKPLACE HARASSMENT:

We strictly prohibit any form of harassment or violence in the workplace. We ensure a safe environment for all, free from intimidation, abuse, and harassment. Employees are encouraged to report incidents through our grievance channels.

C&A is committed to addressing human rights impacts promptly, fairly, and effectively, upholding the rights and dignity of all affected employees. We have established transparent, confidential, and responsive grievance mechanisms to allow stakeholders to report human rights concerns easily. When a grievance is raised, we assess the impact’s severity to determine appropriate remedial actions. We prioritize stakeholder engagement, maintain open communication, and consult affected individuals. We ensure equity by allowing the complainant or whistleblower to engage in the process on fair and respectful terms, considerate of gender,

vulnerability, and power imbalances. Our remedial actions include immediate corrective measures and offering rehabilitation support.

C&A has established the Fairness Channel, an online grievance and whistleblowing portal accessible to our employees as well as workers of suppliers and business partners, our customers, and other stakeholders. Launched in mid-2023 for employees, the Fairness Channel has quickly gained high usage, reflecting awareness and trust.

This channel allows individuals to report violations of human rights, environmental protection issues, corruption, fraud, and any other misconduct related to our operations. Employment-related complaints can include concerns about working conditions, C&A’s actions towards employees, or interactions between coworkers. These may involve issues related to pay, working hours, health and safety, gender equality, discrimination or workplace harassment.

The Fairness Channel ensures confidentiality and allows anonymous reporter submissions. Protection against retaliation is a key commitment, ensuring that individuals feel safe to report concerns. This commitment is explicitly highlighted by the C&A Code of Ethics & Conduct, the Human Rights & Equity Policy, and in all promotional communications for the Fairness Channel. Read more about the Fairness Channel and how complaints are handled, as well as how this mechanism is publicized, on [page 77](#).

The Equity, Inclusion & Human Rights department tracks and monitors all rights-related complaints on

an ongoing basis and offers capacity-building. The Human Rights Governance Council conducts annual and ad-hoc reviews to ensure the overall effectiveness, compliance, and continuous improvement of the complaint management process.

While our Fairness Channel is C&A’s global mechanism for raising concerns, in our retail markets, depending on the local context, works councils or trade unions also serve this purpose.

Our Own Workforce Action Plan

Our specific commitments to positive action and preventing discrimination in all aspects of employment— from hiring and training to daily work and career development—are detailed in our 2028 [Equity, Inclusion & Human Rights Strategy](#). This includes targets on diversity in leadership and measures to prevent bias and embed equity in talent processes, promoting understanding of various aspects of diversity, and educating leaders and co-workers on inclusive behaviors.

Additionally, we actively seek feedback from our employees through focus groups and direct communication. We then use the insights and concerns received through our grievance channel to shape annual action plans to advance equity and inclusion. Moreover, our Strategy guides us in upholding social standards that respect human rights, ensure fair practices, and prevent harassment. In 2023, we focused on three areas in particular;

- gender equity,
- diversity and equal treatment, and
- training and skills development.

OUR WORK ON GENDER EQUITY

At the beginning of the year, we organized a high-level event focused on advancing gender equity, attended by company leadership, including the CEO, and hundreds of participants. During the event, we shared resources designed to educate about gender disparities and engage our employees as allies for women of all backgrounds and identities. Over 180 teams engaged with these materials, conducting gender equity sessions across various locations and providing insightful feedback on parity between genders at C&A. Based on the insights collected from impact survey respondents, we offered a tailored follow-up through the Women’s Leadership Strategy series.

The series was dedicated to supporting women in achieving their professional aspirations. It covered essential topics such as networking, self-promotion, confidence, and strategic productivity. Participants learned to leverage professional connections to advance their careers. Practical advice was provided on building and maintaining a strong network, emphasizing the value of industry events and a robust social media presence. Strategies were discussed to help women overcome cultural norms that discourage self-promotion. Participants practiced creating a personal pitch and were encouraged to showcase their expertise and build a personal brand. The sessions also focused on embracing a growth mindset and addressing biases in the environment that inhibit

career advancement. Insights were shared to help align personal and career growth. The series, which was attended by 650 participants, was positively rated for skills enhancement and value-added.

OUR WORK ON DIVERSITY AND EQUAL TREATMENT

In 2023, our DECIDE unconscious bias training program achieved meaningful milestones. Hundreds of leaders continued with the program, reaching a 90% completion rate cumulatively over 2023-2024. Additionally, nearly 1,500 co-workers voluntarily participated during the year, demonstrating strong support for our efforts to create an inclusive workplace. This year, we also enhanced the program by introducing a specialized “Team Talk on Bias” for corporate offices, store teams, and program champions. An impact survey showed that 87% of respondents had applied the techniques they learned in their daily work, highlighting the program’s effectiveness in raising awareness and its potential to reduce unconscious bias in our people and business decisions.

As we continued our 2022 efforts to address bias at scale, we reinforced this with targeted education for corporate office co-workers on anti-racism, religious inclusion, LGBTI+ inclusion, and the importance of enhanced accessibility of our physical environment. We employed various methods, including events, disseminating educational materials, and featuring stories of co-workers from underrepresented groups, which received significant outreach and engagement.

OUR WORK ON TRAINING AND SKILLS DEVELOPMENT

Our development initiatives continued to nurture talent across C&A, with a total of over 230 participants from different corporate functions. Diversity, equity, and inclusion considerations were centered in this work.

Our Internal Internship program involved participants from nine departments, allowing them to explore various areas and gain inspiration for their career paths. The “Working Out Loud” program provided 12 weeks of guided peer coaching focused on individual development goals. The Young Professionals Board, with members from cross-functional departments, serves as a junior leadership team, offering honest feedback and working on key projects to enhance their visibility and impact. Our Talent Program engaged high-potential talents from Merchandising, Sourcing, Sustainability, and Planning. The Mentoring Program paired internal mentors with mentees, facilitating the exchange of knowledge and career counselling, fostering continuous learning and support. Additionally, our external partnership for talents from underrepresented groups evolved through the year to incorporate internal sponsorship, ensuring internal backing and long-term support for participating talents.

Finally, nearly 4,700 co-workers participated in various courses and training programs through the C&A Academy, which uses a variety of delivery methods, primarily online. While some courses were mandatory, at least 3,900 co-workers engaged in voluntary learning, steering their own development using learning resources offered by our company.

Grievances Raised in 2023

During the fiscal year 2023, C&A received a total of 52 complaints from employees via our grievance mechanisms. Notably, 10 of these complaints specifically alleged human rights concerns.

Upon thorough investigation, five of these complaints were found to, more likely than not, include elements of discrimination or harassment and were determined to be substantiated. Proportionate and appropriate actions have been taken to offer remedy and uphold our workplace standards.

No severe human rights issues and incidents related to our own workforce occurred.

Targets

In terms of targets for our own work force, we know we are a fair reflection of our diverse society when 55% of our senior leaders are women and non-binary people, and 45% are men, of which in each group at least 55% constitute underrepresented identities. We know we have made an impact when 100% of our co-workers of all identities feel included at C&A.

Our Workforce in Numbers

Gender split

GENDER	HEADCOUNT
Women	21,502
Men	3,151
Non-binary or undisclosed gender	7
TOTAL	24660

Total number of employees

TOTAL HEADCOUNT	24,660
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Number of employees per country

COUNTRY	HEADCOUNT
Germany (DE)	11801
Netherlands (NL)	2028
France (FR)	1715
Belgium (BE)	1547
Spain (ES)	1474
Austria (AT)	1256
Switzerland (CH)	1199
Poland (PL)	596
Slovakia (SK)	546
Czech Republic (CZ)	488
Portugal (PT)	447
Romania (RO)	408
Hungary (HU)	341
Croatia (HR)	259
Slovenia (SI)	115
Italy (IT)	111
Luxembourg (LU)	94
Bangladesh (BD)	84
China (CN)	75

Number of employees
(headcount or full-time equivalent)

Gender split by region¹ - *Headcount*

Total Headcount	24660
Total FTE	16826

This year, we have reported data from our global payroll systems as of April, which is two months after the end of the fiscal year 2023. This decision was made to enhance data accuracy due to the ongoing transformation of our reporting systems. This ensures that we capture the most accurate and validated information, ensuring our disclosure is reliable.

REGION	WOMEN	MEN	NON-BINARY OR UNDISCLOSED GENDER	TOTAL
Asia	118	117		235
BENELUX	3,263	405	1	3,669
Central-East Europe	2,464	287	2	2,753
DACH ²	12,397	1,855	4	14,256
South Europe	3,260	4,87		3,747
Total	21,502	3,151	7	24,660

Number of full-time employees by headcount by region - *Full Time Headcount*

REGION	WOMEN	MEN	NON-BINARY OR UNDISCLOSED GENDER	TOTAL
Asia	117	117		234
BENELUX	668	248	1	917
Central-East Europe	1,823	252		2,075
DACH	2,889	1,064	2	3,955
South Europe	1,120	273		1,393
Total	6,617	1,954	3	8,574

Number of part - time employees by headcount by region - *Part Time Headcount*

REGION	WOMEN	MEN	NON-BINARY OR UNDISCLOSED GENDER	TOTAL
Asia	1			1
BENELUX	2,595	157		2,752
Central-East Europe	641	35	2	678
DACH	9,508	791	2	10,301
South Europe	2,140	214		2,354
Total	14,885	1,197	4	16,086

¹ At C&A, we believe there are more than two genders. The data in this report refers to women and men based on the mostly binary gender data available today. The numbers of people outside the binary gender system, based on legal records, likely significantly underrepresent the reality of true self-identification. Our long-term goal is to close data and other inequity gaps for people belonging to underrepresented and historically marginalised groups.

² DACH = Germany, Austria and Switzerland



Gender distribution top management

	WOMEN HEADCOUNT	WOMEN %	MEN HC	MEN %
Gender distribution top management	5	63%	3	38%

Top management is defined as employees on the Leadership Team who report directly to the CEO

Age distribution

AGE DISTRIBUTION	HEADCOUNT	%
Employees under 30 years old	7459	30%
Employees 30 to 50 years old	8955	36%
Employees over 50 years old	8246	33%
Total	24660	100%

Number of training hours

	WOMEN	MEN	ALL EMPLOYEES
Average number of offered training hours	14.7	13.9	14.3
Average number of completed training hours	9.8	9.3	9.6

Workers in the *Value Chain*

We recognize that workers in our value chain are subjected to a number of negative impacts, of which the following have been determined as material topics for us: working time, adequate wages, freedom of association, collective bargaining, health and safety, water and sanitation, gender equality and equal pay for work of equal value, violence and harassment, child labor, and forced labor.

We address these topics through a human rights management system

covering policies, established approaches to engage with affected stakeholders, processes to remediate negative impacts (including grievance channels), and action plans as detailed below. We recognize that the identified impacts interact with our business model in ways detailed below.

So far, C&A's policies, processes and actions only relate to workers employed by independent entities in our upstream value chain.



Strategy

Negative material impacts on workers in our value chain may lead to high worker turnover and overall low productivity. This in turn harms product quality and margins and may lead us to change business relationships more often, which can be costly, among other significant risks. Consequently, we view our general and material topic-specific action plans as investments. Being proactive in these areas helps:

- ensure reliable long-term business relationships with suppliers,
- support worker productivity through better working conditions,
- diminish the risk of supply chain interruptions due to worker protests,
- avoid governmental sanctions for violations of legal due diligence obligations, and
- prevent reputational risks from campaigns of non-governmental organizations.

Stakeholder Engagement

Our [Human Rights & Equity Policy](#) states our commitment to collaborate with suppliers and other stakeholders, including trade unions, worker representatives, civil society organizations representing worker interests, and workers themselves, to prevent, avoid, and address potential negative impacts on workers. In addition, the [C&A Code of Conduct](#) expresses the expectation to suppliers that they engage with relevant stakeholders, including workers and their representatives, where appropriate.

Beyond these general commitments, we have not adopted a more detailed overarching process or policy for stakeholder engagement; we will develop a respective process by the end of the financial year 2025. Currently, based on our general commitment to stakeholder engagement, perspectives of workers, their representatives, and civil society or expert organizations representing their interests are sought and reflected at different stages of the due diligence process.

C&A’s dedicated local social compliance teams are trained to interview workers in the value chain to obtain an unbiased perspective on sensitive issues. These interviews are regularly used during site visits to correctly record possible grievances. These visits are used for our own preventive checks on compliance with our C&A Code of Conduct (preventive measures), to check whether any violations identified have been remedied (remedial measures), or for investigations in connection with reported complaints (complaints procedure). In addition, interviews with workers are part of the annual, or more frequent, process of verifying the self-assessment of suppliers (preventive measures), again with a view to determine whether violations occurred. Finally, direct engagement with workers occurs through grievances voiced via the Fairness Channel, where direct interaction between our case handlers and complainants is possible and used to determine facts of a case and, if needed, to manage its resolution.

Beyond these direct engagements with individual workers, we engage with representatives of trade unions as part of our membership in the International Accord and ACT. This includes IndustriALL Global Union and

its local country affiliates and, in the case of the Accord, UNI Global Union. The agreements and processes agreed for the International Accord and ACT are co-created between brand and trade union representatives. Results of the International Accord and ACT are transparently published on the respective websites (see [International Accord](#), and [ACT](#)).

Finally, we are open to engagement with trade union representatives on any specific grievance from workers until the grievance is resolved. In case civil society organizations credibly representing worker interests request engagement with C&A on specific actual or potential negative impacts, we will engage in good faith to consider and, if viable, co-create projects to prevent, mitigate, or remediate the issues. During the reporting period the latter type of engagement has taken place twice, including in one case with organizations representing the interest of marginalized women workers. As of the writing this report, this engagement has not yet resulted in any concrete projects.

Headquarters level Sustainability Team leaders who engage with trade unions and civil society organizations have long-standing experience in working with such organizations. They collaborate closely with local social compliance staff who know local contexts and actors, including their respective needs.

C&A has not yet taken any specific measures to mitigate potential negative impacts for workers in the supply chain which may arise from a transition to a climate-neutral economy. Nevertheless, our general engagement with trade unions and our support for multi-employer collective bargaining agreements (as in the case of

Cambodia) are well aligned with trade union demands on a just transition.

Policies Related to Workers in the Value Chain

Our [Human Rights & Equity Policy](#) provides guidance on how to address human rights impacts, including the material negative impacts on our upstream value chain workers. This policy is aligned with the UN Guiding Principles on Business and Human Rights and OECD Guidelines for Multinational Enterprises. It has been approved by the C&A Leadership team, which also holds ultimate responsibility for its implementation. The Policy reflects our commitment to human rights and equity, including people working in our supply chain, in alignment with international standards. This includes the commitment to implement a human rights management system. The human rights management system encompasses due diligence processes for:

- identifying, preventing, remediating, and/or mitigating risks to human rights of workers,
- accessible and effective grievance channels,
- tracking progress, and
- public reporting on the implementation of these processes.

A specific Human Rights Governance Council, including senior management representatives, is tasked with overseeing and monitoring the implementation of these due diligence processes.

The [C&A Code of Conduct](#) specifies our human rights expectations to our upstream suppliers, detailing the expectation to uphold the rights of workers in the value chain regarding:

- a prohibition of child labor and forced labor,
- rights to equality, inclusion and freedom from discrimination,
- respect of rights to freedom of association and collective bargaining,
- respectful treatment and freedom from harassment and abuse, including gender-based violence,
- health and safety at work,
- specific protection for vulnerable groups of workers,
- regular employment,
- adequate wages, and
- working hours aligned with international standards.

The [Supporting Guidelines to the Code of Conduct](#) provide further details on the expected conduct, outlining what we mean by the different standards of conduct, what we expect from suppliers in terms of implementation, and potential consequences of non-compliance.

The C&A Code of Conduct applies to all production units used to manufacture, finish, or process C&A merchandise or components. This is regardless of whether these units are operated by entities that are fully or partly owned by the suppliers or are contracted or subcontracted entities or persons. In terms of production processes, the C&A Code of Conduct covers any process of cutting, sewing, embroidery, accessories, printing, laundry/washing, dry processing, garment dyeing, panel knitting, linking and final assembly/packing. All suppliers of merchandise provide contractual assurance to C&A to implement and adhere to the C&A Code of Conduct at all production units conducting these processes, whether owned or subcontracted.

The Code was drafted with input from IndustriALL Global Union as a representative organization for workers in our upstream supply chain and ILO Better Work as an expert organization for workers’ rights. It is accessible to all interested stakeholders on our website in 11 languages, including the most important languages of our sourcing markets. In addition, all suppliers of merchandise have received and signed the C&A Code of Conduct and acknowledged the Supporting Guidelines to the Code of Conduct. The C&A Code of Conduct is also available in further languages on the internal virtual supplier interface.

The C&A Code of Conduct is complemented by the following set of additional specific policies:

- [Forced Labour Policy](#), specifying the set of consequences that we attach to non-compliance with our expectations on forced labor within the C&A Code of Conduct, regardless of which stage of production, including deeper tier levels upstream; all suppliers must sign the Forced Labour Policy.
- [Undisclosed Production Rules](#), specifying the set of consequences for suppliers that shift production for C&A to a production unit that has not been authorized for production by us before.
- [Responsible Purchasing Practices Policy](#), confirming the commitments to responsible purchasing practices, including ring-fencing of labor costs, fair terms of payment, better planning and forecasting, trainings for responsible sourcing and buying, and compliance with the [Responsible Exit Policy](#), that we have committed to as a member of the initiative for living wages ACT (Action, Collaboration, Transformation).
- [Responsible Exit Policy](#), specifying, in line with our commitments as a member of ACT, our process for

- ensuring that ending our business relationship with a supplier does not entail negative impacts for workers.
- Terms and Conditions for the Supply of Merchandise, specifying the contractual conditions for all business relationships for the supply of merchandise. This includes commitments to find reasonable solutions with the supplier in the spirit of shared responsibility for human rights to prevent, mitigate or remediate negative impacts for workers in case our own business conduct contributes to negative impacts.

With the exception of the Terms and Conditions for the Supply of Merchandise, these complementary policies are accessible on our [website](#). Suppliers have access to all these documents on the internal virtual supplier interface.

The C&A Code of Conduct was adopted and published in its current form on March 21, 2023, together with the Supporting Guidelines. Regarding workers in the supply chain, key changes were references to our purchasing practices, a stronger emphasis on complaint mechanisms, and further alignment with the OECD Due Diligence Guidance. The Undisclosed Production Rules, the Responsible Purchasing Practices Policy, and the Responsible Exit Policy are new policies which were also adopted and published on March 21, 2023. The Terms and Conditions were adopted in their current form on March 30, 2023. The key change related to establishing a contractual framework for a shared responsibility for human rights of workers in the supply chain and giving suppliers the right to indicate if purchasing practices of C&A hamper their compliance with the expectations of the C&A Code of Conduct.

ALIGNMENT OF OUR POLICIES WITH INTERNATIONALLY RECOGNIZED INSTRUMENTS

The Human Rights & Equity Policy as well as the C&A Code of Conduct and its Supporting Guidelines reaffirm our commitment to respect internationally recognized human rights as set out by the UN Guiding Principles on Business and Human Rights and to adhering to the International Bill of Human Rights¹, the principles of the UN Global Compact, and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. All commitments are based on standards contained in international conventions and recommendations. Each section of the C&A Code of Conduct specifies the international conventions and recommendations upon which the respective expectations toward suppliers are based. In addition, expectations of our own and our suppliers’ conduct are based on the recommendations of the OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector (OECD Due Diligence Guidance).

¹ i.e. the UN Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights.

Prevention of Negative Impacts

In terms of prevention of negative impacts on workers, the following general processes are in place and covered by policies:

- As expressed in the Human Rights & Equity Policy, we seek to do business with suppliers that share our values regarding human rights of workers. Contractual assurance of adherence to the C&A Code of Conduct is a pre-condition for entering into a business relationship, as ensured through the Terms & Conditions for the Supply of Merchandise. The Supporting Guidelines further specify that suppliers must make workers aware of the requirements of the C&A Code of Conduct, train managers and supervisors on how to ensure compliance with those requirements, and conduct regular internal assessments to ensure conformity to legal and regulatory requirements and the C&A Code of Conduct. Based on our own prioritization of human rights risks, we support suppliers by providing training on the requirements of the C&A Code of Conduct and the content of the Supporting Guidelines and, where appropriate, by offering guidance on best practices for management systems.
- We assess production units against the C&A Code of Conduct, identifying and remediating non-compliances as part of our monitoring process. Suppliers must allow us and/or our representatives and/or third parties designated by C&A to perform assessments, verify self-assessments, or conduct other visits, whether announced or unannounced. On such occasions, suppliers must be cooperative, transparent, and provide unrestricted access to workers, records, work areas and dormitories, if

applicable. Suppliers must allow worker interviews to take place in a private and confidential setting and must not coach workers on how to respond to questions or retaliate in any form whatsoever against workers providing information in worker interviews. Suppliers must maintain complete and accurate records for at least 12 months so that compliance can be effectively assessed or verified. Suppliers must not manipulate information or misrepresent any aspects of their operations.

Purchasing Practices

We continuously reflect on potential negative impacts of our sourcing and purchasing practices on workers, and we commit to introduce adaptations as required. Generally, the Responsible Purchasing Practices Policy and Responsible Exit Policy prevents negative impacts on workers from occurring through our own purchasing practices and sourcing decisions. The Supporting Guidelines, in alignment with the Terms and Conditions for the Supply of Merchandise, further specify the following:

If a supplier reasonably believes that C&A has caused or contributed to a violation of the C&A Code of Conduct by not adhering to our commitments to responsible purchasing practices or that remediation requires C&A’s participation, C&A is willing to review any evidence provided by the supplier in support of this claim. In such cases, C&A may, at our sole discretion and in line with our prioritization of human rights risks, decide to support the preparation and implementation of corrective action plans or remediation.

As part of our ACT membership, we monitor and are held accountable for the implementation of our purchasing practices commitments through the ACT Accountability and Monitoring Framework. The Accountability and Monitoring Framework uses surveys to our own employees responsible for purchasing practices and to our suppliers to monitor our compliance with these commitments. In the latest Accountability & Monitoring Report relating to the 2023 survey, we have again reached positive scores, especially in comparison with other ACT member brands.

REMEDICATION AND MITIGATION OF NEGATIVE IMPACTS

In terms of remediation and mitigation, the following general processes are in place and covered by our Human Rights & Equity policy:

- We will use our relationships with our suppliers to urge them to take adequate steps for the protection of human rights of workers.
- Our dedicated local social compliance teams or third parties defined by C&A support awareness raising, provide training and capacity building to constantly improve working conditions, and address root causes of non-compliances.
- Only if suppliers are not willing to take action or cooperate for remediation, we reserve the right to end these relationships, taking into consideration our commitment to a responsible exit in line with respective Terms & Conditions. The Supporting Guidelines further specify these processes as follows:
 - C&A evaluates the compliance of production units by a methodology that considers the severity and urgency of non-compliances found on a five-scale

compliance classification (minor / minor+ / major / major + / zero tolerance¹).

- Each evaluation leads to a rating that has clearly defined business implications, which are communicated to suppliers and production units in mandatory trainings. We will provide feedback to suppliers on their performance.
- C&A defines non-compliances with a classification of major+ or zero tolerance as severe incidents. In case violations of the C&A Code of Conduct are detected in an assessment, during a visit from our dedicated local social compliance staff or designated third party, or raised through C&A’s whistleblowing and grievance system (Fairness Channel) or other channels, the supplier shall develop a corrective action plan or remedy, with C&A’s support, if necessary, and implement it within a reasonable time frame, depending on the nature of the violation. C&A reserves the right to review content and time frames of corrective action plans or remedies with a view to ensure effective risk prevention and remediation. C&A expects adequate evidence of the implementation of the corrective action plan and/or remediation.
- We reserve the right to temporarily suspend the business relationship with a supplier that fails to implement the agreed corrective action plans or remediation within agreed time frames.

1 Zero Tolerance Issues in the Supply Chain policy

→ In case of serious violations or continued non-compliance despite agreed corrective actions, C&A reserves the right to terminate the business relationship with the supplier, in line with our own commitments to a responsible exit. Specific requirements on remediation for negative impacts on workers on specific topics, such as child labor, are stipulated in the respective chapters of the Supporting Guidelines.

Throughout the reporting period, our dedicated social compliance teams in each major production country have been implementing these processes on a regular basis. In this context, the teams cooperate with designated third parties regarding specific risk topics as detailed below. Where necessary, these teams are supported by colleagues from sourcing and procurement. If needed, we will exert leverage towards a supplier by temporarily suspending eligibility for further order placement to incentivize cooperation towards effective corrective actions and implementation. These processes will be continued at least for financial year 2024 for all material topics.

Number of Assessments, Audits, and On-Site Visits:

	ASSESSMENTS
SLCP Assessments	660
C&A Audits	79
Additional On-Site Visits by C&A Staff (incl. visits for verification of remediation)	313

We have 14 staff members in local sourcing offices who are responsible for the implementation of these processes, as well as the action plans mentioned below. Our dedicated social compliance teams are headed by staff (1 person) at headquarter level who ensures coordination with headquarter and local sourcing staff. A dedicated team for Social Stewardship (2 persons) provides strategic guidance to align with human rights due diligence processes and requirements.

Risk Analyses

Our documents and policies codify our commitment to identify, prevent, mitigate and, where necessary, remediate negative impacts for workers in the value chain. According to these, and in compliance with German legislation, we conduct both annual and ad-hoc risk analyses.

The annual risk analysis comprises three steps:

1. An abstract risk analysis providing an understanding of the nature of the risks workers in our supply chain face and how prevalent and severe these risks are in different countries. If possible, to determine, we also examine production process steps in the upstream supply

- chain based on external sources, such as ILO reports, country-specific human rights reports, reports from multi-stakeholder initiatives, worker rights organizations active in the garment and textiles sector, and sector-specific news reports;
2. A concrete risk analysis providing an aggregate country-level perspective of negative impacts identified and remedied based on non-compliances with the C&A Code of Conduct identified at production units in our supply chain. These may be identified through our ongoing monitoring as well as complaints and allegations raised to us, taking into account the severity of issues identified; and
 3. A net risk evaluation, considering findings of both abstract and concrete risk analyses. This ensures that potential negative impacts for workers that are hard to detect through assessments are still reflected in our strategies to mitigate negative impacts and takes into account potential contribution to the risk based on our own actions.

On a supplier level, the annual risk analysis feeds into an update of the social risk score, which is a part of the overall supplier evaluation and indicates key points of feedback to be provided to suppliers. On a country level and risk topic level, the annual risk analysis determines the focus areas for action to improve the prevention, mitigation, and remediation of negative impacts for workers.

GRIEVANCE MECHANISMS FOR WORKERS IN THE VALUE CHAIN

Direct Grievance Mechanisms

Workers within our value chain, as well as other affected parties and external whistle-blowers, can raise any concerns directly with C&A via a dedicated Fairness Channel, enabling further access to remedy. The Fairness Channel is an essential part of our integrated human rights risk management system, supported by a dedicated online tool. The tool equips us to handle all grievances, whether received through the online tool of the Fairness Channel directly or through other channels, such as e-mail to local or headquarter offices, through one integrated system. Such reports will always be treated confidentially and can be made anonymously. If the person reporting a case anonymously provides information that would allow conclusions on the reporter's identity, the information will be treated confidentially. A special Data Privacy Policy and a Code of Procedure, accessible through the tool, detail how confidentiality and rights to privacy and data protection are ensured. It also provides assurance to workers, or other persons reporting a case, that no IP addresses or other personal data of the complainants are stored as part of the complaint procedure. Additional details on the policy for protection of personal data can be found on [page 71](#).

Online submission through the tool can be made in any language spoken across the supply chain at no cost to the complainant or whistleblower. The submission process is easy and accessible, keeping barriers to usage low. The tool enables communication with the complainant in any language. The Code of Procedure gives the complainant an overview of the procedure, including expected timelines, ensuring predictability. The procedure can be summarized as follows:

- After submitting a report via the Fairness Channel, the reporter will receive a confirmation receipt, and the report will be assigned to a responsible C&A case handler who will handle the complaint confidentially and in accordance with the Code of Procedure.
- After the nature of a report is established, where warranted, the dedicated case handler at local offices in production countries will start a formal investigation, which may include but is not limited to fact checking, interviews, if needed at the respective production units, and dialogue with the reporter.
- If a risk or violation is identified, appropriate preventive or corrective measures will be taken, in direct contact with the affected supplier as the case may be, in accordance with the applicable laws and the C&A Code of Conduct and Human Rights & Equity Policy. The appropriateness of these measures is evaluated and decided by C&A on a case-by-case basis. Generally, reports shall be processed and concluded within three months after receipt.
- The case reporter shall receive feedback on the report within three months after receipt to ensure transparency, provided that the contact details of the reporter are known and provided further that such feedback does not affect internal enquiries or investigations or rights of any persons subject to or

named in the report.

- Reports of alleged violations of human rights or environmental protection will be considered within the annual risk analysis to ensure cases are used as a source of continuous learning.

To ensure trust in submitting grievances, C&A communicates a strict expectation of non-retaliation against any complainant, regardless of the complaint channel used. To ensure legitimacy, suppliers are required to pay a contractual penalty in case retaliation against a complainant is confirmed.

Since this new tool was just launched in 2023, we shared information about it in a staggered approach over several months via posters with all tier 1 production units, except for those located in China. The poster must be published visibly at those facilities in areas often visited by workers. Since the start of the year, the number of complaint submissions by workers in the supply chain made through this tool has been slowly increasing with the further roll-out to more facilities. In addition, workers, trade unions, and other organizations representing workers’ interests continue to refer cases to us through e-mails. Overall, out of 14 cases received, whether through the tool or direct communication by email, 11 were found to be substantiated, of which eight cases could be resolved. We view these results as initial indicators of trust and effectiveness. Further evaluations aligned with UN Guiding Principles criteria will be developed through the end of financial year 2024.

Industry Grievance Mechanisms

In addition, we require that all suppliers have effective operational-level grievance mechanisms in place and

enable worker representation. To enable further access to remedy, C&A participates in the following complaint mechanisms:

A Complaints Mechanism of the International Accord / RMG Sustainability Council (as part of our membership in the International Accord).

The Worker Complaint Mechanism of the ACCORD in Bangladesh is now operated by the RMG Sustainability Council. It is accessible via hotline promoted in trainings for all employees of covered factories, which includes all our tier 1 factories in Bangladesh. Workers’ trust is proven by a high number of complaints received and effectively remediated by the mechanism overall, both in terms of complaints relating to occupational safety and health (OSH) and non-OSH topics.

B ACT - Interim Dispute Settlement Mechanism in Bangladesh (as part of our ACT membership)

During the reporting period, seven complaints were received through this channel. Cases were related to unpaid severance or unjust termination and wage arrears owed upon termination. All have been resolved successfully. The complaint channel is open to workers and trade union federations regarding grievances related to workers’ rights, particularly pertaining freedom of association, retrenchment and due payment of wages and benefits at any production unit in our value chain in Bangladesh. The Channel is considered effective given that between November 2020 and July 2023 it received 92 eligible cases regarding all ACT brands, of which 67 % could be fully and a further 10% partially resolved.



C *Worker Support Center (in the context of a project engaged in as part of our membership in the German Partnership for Sustainable Textiles)*

The Worker Support Center is a grievance mechanism, accessible online, for garment workers in Turkey. It is run by MUDEM, a non-governmental organization with specific expertise for the situation of Syrian refugees in Turkey. We cooperate with MUDEM on the investigation and remediation of complaints concerning production units of C&A suppliers and have supported MUDEM in providing detailed information on the complaint mechanism at 10 selected production units in Turkey.

During the reporting period, six complaints were received via this channel. Two complaints were out of scope. Of the remaining four complaints, one complaint was substantiated and has been remediated, one closed without result as no communication with the complainant was possible and the complaint could not be substantiated, and two complaints are currently on hold due to ongoing court proceedings between the respective workers and their employers. The complaints in scope addressed unjust termination and lack of severance payments, and verbal harassment.

Progress *Update*

For each of the sub-topics listed below, the following descriptions highlight our policies, any severe incidents identified in 2023, and our planned actions to mitigate negative impacts.



Working Time

C&A acknowledges in our [Human Rights & Equity Policy](#) that our own purchasing practices can play a key role in enabling our suppliers/business partners to plan their production and avoid regular overtime work. We are committed to assessing and mitigating these risks to avoid contributing to excessive working hours for the workers of our suppliers. C&A commits in the Supporting Guidelines specifically to seeking to assess and adapt our purchasing practices with a view to support suppliers in keeping overtime within the limits foreseen in the C&A Code of Conduct. Such reviews of our own purchasing practices based on surveys to responsible internal colleagues and suppliers are part of our ACT membership requirements.

In addition, the Terms & Conditions for the Supply of Merchandise specify that for any material modification of purchase orders (changes in quantity, design specifications, delivery dates) C&A and the supplier shall consider potential negative impacts on workers, which may be related to working time, with a view to prevent that such modification contribute to negative impacts on workers or to take mitigating measures, if such impacts are unavoidable. Through our commitments to better planning and forecasting stipulated in the Responsible Purchasing Practices Policy, the occurrence of such situations shall be prevented to the greatest extent possible.

During the reporting period, C&A’s assessments and/or grievance channels identified the following severe incidents regarding Working Time in production units in our upstream supply chain:

- Excessive overtime in Bangladesh (four cases) and Turkey (one case).
- Extended overtime, meaning not providing required rest days, in Egypt (one case). One additional case in Bangladesh, received as a grievance, has already been remediated within the reporting period.

Generally, overtime, including excessive overtime, is a systemic issue in the garment sector which relates to low regular wage levels. For actions to address low wages, refer to the material topic of adequate wages below.

Adequate Wages

The Human Rights & Equity Policy indicates that C&A aims to ensure that workers in our supply chain receive adequate wages, meaning these should, at a minimum, meet the basic needs of individuals and their dependents and allow for a discretionary income to lead a modest, but decent life. Being a member of ACT is a key instrument to work towards such adequate wages.

We acknowledge that our own purchasing practices can play a key role in enabling suppliers to pay adequate wages. Our Responsible Purchasing Practices Policy contains commitments to ring-fencing labor costs in price negotiations, reflect increases in negotiated wages in labor components of costing calculations, and fair terms of payment, which all support suppliers

to pay adequate wages. In this context, and as described on page 62, if a supplier reasonably believes that C&A has caused or contributed to a violation of the C&A Code of Conduct by not adhering to our commitments to responsible purchasing practices, we are willing to review any evidence provided by the supplier in support of this claim.

During the reporting period, C&A’s assessments and/or grievance channels identified the following severe incidents regarding wage payments at production units in our upstream supply chain:

- wage arrears not being paid on time, mostly to workers who resigned (four cases in Bangladesh, one case in Turkey, one case in Pakistan),
- payments below the minimum wage to some workers (two cases in Bangladesh, one case in China, one case in Pakistan), and
- forced unpaid leave (one case in Bangladesh).

Wage-related incidents occur relatively frequently in the countries mentioned, yet regularly only relate to individual workers and are therefore not considered as indications of a systemic issue affecting a large number of workers.

Corrective actions on these incidents have been agreed and in four cases they have already been successfully remediated. The remaining cases will be followed up by local social compliance staff in accordance with regular processes during the financial year 2024.

In addition, we recognize that wages for garment workers are oftentimes too low for a decent standard

of living in most production countries and require collective efforts. Therefore, we cooperate with other brands and IndustriALL on improving wages for workers in Bangladesh, Cambodia, and Turkey through our membership in ACT.

During the financial year 2024, C&A seeks to support the implementation of collective bargaining agreements in Cambodia that include a wage premium beyond the national minimum wage.

Freedom of Association and Collective Bargaining

Our C&A Code of Conduct requires suppliers to allow workers to form and join trade unions of their own choosing and prohibits them from discriminating against workers participating in trade union activities. It also requires that suppliers not interfere with, discourage, or directly involve in trade union activities, and obliges them to negotiate with workers’ representatives in good faith, uphold all provisions of collective bargaining agreements, and respect all locally applicable regulations on industrial relations. In alignment with best practices and UN Global Compact principles, the Human Rights & Equity Policy and the C&A Code of Conduct express the expectation that suppliers enable alternative means for worker representation and negotiation between workers and management when local laws have restrictions on forming or joining workers’ associations or collective bargaining. The C&A Code of Conduct explicitly requires suppliers to adopt an open and collaborative attitude towards worker representation. With a view to ensure a climate free of threats or intimidation, the C&A Code of Conduct also

requires suppliers to ensure that security personnel employed to protect the premises of the production unit or business, either directly or as third party, do not interfere with the rights to freedom of association and collective bargaining.

During the reporting period, C&A’s assessments and/or grievance channels identified the following severe incidents regarding freedom of association and the right to collective bargaining at production units in our upstream supply chain:

- Interference of factory management with trade union activities (three cases in Vietnam, one case in Cambodia), and
- One violation of the right to collective bargaining through a collective bargaining agreement that undercut legal protections for workers (in Vietnam). Two incidents in Vietnam and one incident in Cambodia have already been successfully remediated. The remaining incident in Vietnam is addressed by a corrective action plan and will be followed up by our local social compliance staff.

In addition, we note that in Bangladesh there is a climate of discouragement or even intimidation regarding collective engagement of workers, especially through trade unions, and that in China the legal framework does not provide the space for independent worker representation.

In the financial year 2024, we are planning the following actions on freedom of association and collective bargaining:

- In Cambodia, we will support, through a binding agreement with IndustriALL, enabled through our

membership in ACT, the implementation of collective bargaining agreements.

- In Bangladesh, we will continue to cooperate with trade union representatives through ACT and the Sustainability Council
- As a measure of effectiveness of our actions on freedom of association and collective bargaining, we will track whether there are collective bargaining agreements in place at production units of our suppliers that go beyond existing legal protections for workers.

Occupational Safety and Health (OSH)

The Human Rights & Equity Policy states that suppliers are expected to take appropriate measures to prevent all kinds of occupational illness, injury, and accidents and promote a healthy work climate. It also affirms a worker's right to “walk off the job due to danger of injury caused by urgent safety hazards” and commitment to ensure safe and hygienic workplaces for workers. The Code of Conduct and the Supporting Guidelines provide further detail to such expectations.

The requirements of the Supporting Guidelines specifically emphasize stringent OSH management systems, including worker-management OSH committees and technical expertise, where legally required or needed.

During the reporting period, C&A’s assessments and/or grievance channels identified the following severe incidents regarding occupational safety and health at

production units in our upstream supply chain:

- Six violations of occupational safety and health standards were identified (three in Turkey, two in China, one in Bulgaria), which mostly related to hazard prone gaps in a factory’s OSH management or specific hazards, such as unsafe elevators.

These incidents have been addressed through our regular work on corrective action plans. Three of these incidents have already been remediated, whereas the remaining ones will be followed up by our dedicated local social compliance teams.

Generally, management of fire and building safety remains a widespread issue in several production countries. In response, C&A continues our cooperation with other brands and global and local trade unions in the International Accord and its country programs in Bangladesh (RMG Sustainability Council) and Pakistan to address fire and building safety issues through independent inspections, safety trainings, and complaint mechanisms. Based on agreements with IndustriALL, the cooperation always includes commitments to ensure, through purchasing practices or other means, that remediation at covered production units within our value chain are financially feasible.

In addition, we seek to create a positive impact for the social security of workers or their descendants in the case of work-related accidents leading to deaths or disability through continued participation in the ILO-run pilot for an Employment Injury Scheme in Bangladesh. The goal is to transfer this pilot into a sector-wide, nationally legislated program in Bangladesh.

Gender Equality and Equal Pay for Work of Equal Value

Our agreements with suppliers express expectations on equal treatment of workers and freedom from discrimination. We expect in the C&A Code of Conduct that suppliers commit to equity and inclusion and take appropriate measures to ensure the implementation of these commitments. We transparently indicate our willingness to give preference to suppliers who are showing their commitment with advanced practices and suppliers run by women and under-represented groups.

During the reporting period, C&A’s assessments and/ or grievance channels identified the following severe incidents regarding gender equality at production units in our upstream supply chain:

- Five cases of discrimination due to (expected) pregnancy have been detected in Bangladesh. The incidents will be remediated based on regular processes for corrective action plans and follow-up by dedicated local social compliance teams during the financial year 2024. In addition, communication with suppliers working with respective production units will emphasize the importance attached to the rights of pregnant workers and young mothers to enable gender equality at the workplace.

Violence and Harassment at the Workplace

The C&A Code of Conduct and the Supporting Guidelines include a strict prohibition on gender-based violence and harassment. This includes the requirement to suppliers to allow workers to remove themselves from a work situation that they have reasonable justification to believe presents an imminent and serious danger to life, health, or safety due to violence and harassment, without suffering retaliation. The Supporting Guidelines further include a non-exhaustive list of unacceptable behavior that suppliers are expected not to tolerate and a requirement for suppliers to have a respective internal policy. Operational-level grievance mechanisms must be suitable to address cases of violence and harassment, including gender-based violence and harassment, where necessary or legally required.

In the reporting period, one severe case in Bangladesh was reported that involved sexual harassment at the workplace, which has already been remediated by the management of the respective production unit.

Despite only a few detections, we consider gender-based violence and harassment potentially widespread and a systemic potential negative impact in our supply chain which is largely composed of young women supervised by men in hierarchical structures in environments often permissive of, or tolerating, perpetrations. We will continue to communicate our expectations on this matter and address any, case as a matter of high urgency.

As one high-risk supplier in India was identified in financial year 2022, we continue our efforts to establish a project with non-governmental organizations and trade unions representing marginalized women workers and addressing the root causes of gender-based violence and harassment through worker-driven complaint mechanisms and social dialogue.

Forced Labor

The Human Rights and Equity Policy contains prohibitions of forced or compulsory labor, trafficked labor, and child labor. The C&A Code of Conduct, complemented by the Supporting Guidelines and the Forced Labour Policy, expresses the directive to suppliers that we do not support, engage in, or condone any form of forced labor, migrant forced labor, modern slavery, or human trafficking throughout any production stage within our supply chain. The Supporting Guidelines define specific expectations on the treatment of migrant labor to prevent forced labor of this particularly vulnerable group. Our Responsible Purchasing Practices Policy supports preventing the occurrence of forced labor. The Forced Labour Policy stipulates strict commercial consequences to identified cases of forced labor and seeks to prevent suppliers from considering any reliance on forced labor practices.

No case of forced labor was detected or confirmed during the reporting period.

The abstract risk analysis has indicated that in India, multiple factors may coalesce to create a heightened risk of forced labor, such as young, female migrant

workers, housing for workers on suppliers’ premises, or contract labor as excessive overtime. Regarding one specific high-risk supplier identified in financial year 2022, we continue to seek to establish a project to address this concern.

We will also continue to minimize risks of being linked to state-sponsored forced or prison labor by enforcing, if needed, the strict consequences indicated in our Forced Labour Policy and by applying specific vigilance and preventive action to unauthorized subcontracting (p. 68). We acknowledge that state-sponsored forced labor may occur regarding cotton production.

Child Labor

In our Human Rights & Equity Policy, we state that we do not tolerate child labor; children below 16 years old must not be employed, apart from apprenticeship or vocational training programs. The C&A Code of Conduct promotes adherence to internationally recognized human rights standards throughout our supply chain and business relations. Suppliers must commit to implement and adhere to the Code.

Under the C&A Code of Conduct, suppliers must comply with all special protections for young workers between 16 and 18, as required by applicable laws. Suppliers must take measures to ensure that these young workers are protected from working conditions likely to endanger their health, safety, or their moral integrity, and/or which harm their physical, mental, spiritual, moral, or social development. This includes preventing young workers from doing hazardous work, from working at night, or from working longer than

permitted by law, and ensuring they receive annual medical check-ups.

The Supporting Guidelines state that, in the event of evidence of child labor at a production unit, suppliers must provide minimum wage payment to the child from the moment of detection until she/he turns 16 years old. Payment should be made monthly, not in one lump sum. A health screen prior to departure is also required, as well as compensation for transportation and accommodation for a child’s relatives to take her/him back home. If the child is willing to attend school lessons, suppliers must bear the corresponding fees until completion of the school year after which the child turns 16, at which point the former child worker should be given the opportunity to be re-employed. The discovery of child labor at a production unit is considered a zero-tolerance issue. It leads to order suspensions, which may be lifted only upon full compliance and cooperation with the specific child labor remediation process. In severe cases, production is halted and shifted to another supplier.

During the reporting period, C&A’s assessments and/or grievance channels identified the following severe incidents regarding child labor at production units in our upstream supply chain:

- Four cases of child labor (two in Bangladesh, one in China, one in Turkey), of which in one case the child has not been found working but accompanying its mother to work. The cases in Bangladesh and Turkey occurred at production units that had been used without our prior authorization, in violation of our C&A Code of Conduct and Undisclosed Production Rules.

All identified severe incidents have been remediated in compliance with our policy. These cases of child labor are considered individual incidents and not of a widespread or systemic nature.

Based on the abstract risk analysis, we recognize there is an additional potential risk of child labor in deeper supply chain tiers that are not yet covered by our social compliance programs in Bangladesh, Turkey, India and Pakistan, including in cotton production. We seek to increase the visibility of our supply chain regarding cotton production, which will allow more targeted action in the future.

Unauthorized Subcontracting

To minimize the risk of unauthorized subcontracting and related negative impacts on workers in our supply chain, we will take the following actions during the financial year 2024:

1. Reiterate in our supplier communication our strict stance prohibiting production at facilities without authorization and emphasize, as established in the Terms & Conditions, the right of suppliers to indicate if purchasing practices of C&A hamper compliance with the C&A Code of Conduct;
2. Include unauthorized subcontracting as a major point in a supplier’s overall evaluation;
3. Task local teams with specific vigilance in their factory visits on indications that production is shifted to other production units.

Such steps shall focus first on Bangladesh, China, Turkey, and India in which unauthorized subcontracting has been identified. These planned actions will help prevent workers in our supply chain from being subjected to negative impacts, including child labor and forced labor. The indicator for the effectiveness of such actions is a reduction of cases of unauthorized subcontracting despite increased vigilance, at least until the end of financial year 2025.

Consumers & End Users

Our consumers and end users are a critically important stakeholder. In addition to ensuring that we are providing the products they are looking for, we also have a responsibility to ensure that we protect their data, that we communicate with them in a transparent way, and that we create an environment that highlights inclusivity.



We believe that establishing positive relationships with our diverse consumers is a prerequisite for our company’s social license to operate. This deep belief is reflected in our dedication to promoting the dignity and inclusion of all consumers and end-users. We ensure that consumers from all backgrounds and identities are respected and valued.

- KEY PRINCIPLES INCLUDE:
- Prioritizing consumer health and safety.
 - Promoting an inclusive retail environment welcoming to all consumers.
 - Implementing responsible and inclusive marketing practices.
 - Respecting consumer privacy and protecting personal data.
 - Actively engaging with consumers to gather feedback and address concerns.



Transparency

At C&A, we have been on a journey towards greater transparency for many years. And this journey continues. We are pleased to see our customers endorse this and demand even more information about where our clothes are made, how the people who make them are treated, and how the materials are sourced.

We are committed to a high level of openness, starting with transparency about our supply chain – and we want to share this information with our customers. We set ourselves the goal that, by 2028, one out of two customers recognize that they are able to make informed choices when shopping at C&A.

Our annual consumer survey revealed an overall decline of category buyer trust in sustainability claims in fashion retail. In 2023, 35% of our customers felt they were able to make informed purchasing choices on environmental and social product attributes. While some of the decline compared to our 43% baseline can be explained by general decline in category buyer trust it also shows that we must continue improving the level of information provided and standardize sustainability communication. We see legislative developments, such as the Green Claims Directive, as a welcome opportunity to establish common standards on how to talk about sustainability across brands and

sectors, allowing consumers to make informed decisions and build trust. For the moment, while these initiatives are still emerging, we are taking our own steps to safeguard these topics.

We aim to pro-actively share information with our consumers and end users, which can have a positive impact in many ways, such as by providing clear and concise information on our products, materials, production processes, and environmental and social impacts. Transparently engaging with our consumers provides us with the opportunity to build trust, brand loyalty, and even revenue while educating current and potential consumers through our accurate labeling and ethical disclosure. On the other hand, incorrect or opaque information can negatively impact consumer. If the wrong information is provided, risks identified are related to compliance, penalties, product removal, and reputation. One specific example could be that if incorrect or opaque information is provided, we could harm consumer groups that are allergic to certain materials.

This is why we have systems in place to guide how we engage, and why we have a transparency approach and action plan. Learn more about these systems and our targets below.

Strategy

We demonstrate transparency to our consumers and end users through our product-level labeling as well as our website, and by inviting communication through our customer service channels.

Additionally, we conduct annual customer surveys to gain perspectives on transparency and to understand the perceptions of our customers regarding transparency related aspects. Dedicated research related to on-product labeling serves as additional source of information. Customers are also encouraged to express their view through our customer service channels as well as our grievance channel.

The customer service channel at C&A is operated via a third party working closely with the internal C&A customer service team. The service channel is available six days a week and managed by a large team of operators supported by trainers, coaches and others.

The C&A internal customer service team steers this external company. Service level agreements such as response times, capacity of operators, staff planning, and other aspects are contractually regulated.

All reasons for contact, services delivered, and other critical factors are monitored on a daily, weekly, and monthly basis, depending on the specific key performance indicators; information is aggregated via either real- or near-time reporting tools or system-generated reports.

Additionally, are dedicated channels for reporting illegal content found in the online shop. The channels are available via the C&A company website (<https://www.c-and-a.com/de/de/corporate/company/kontakt/fairness-kanal>), online shop, and stores. Complaints can be raised directly in the system, by mail, live chat, or by phone. Complaints can also be raised anonymously. Depending on the nature of the issue there are processes in place to determine how the complaint is processed and remediated. Depending on the case this can include escalation to management, removal of merchandise from distribution channels, and dedicated consumer-facing information. In case of a complaint related to fake or mimic websites, a dedicated process is in place to verify the complaint and, if confirmed, address and warn consumer via our C&A service page.

Progress Update

Transparent communication allows consumers to make informed choices and to buy products that align with their values. We strive to be accurate and comprehensive in our communication with our customers, and our approach to this is three-fold.

We strive to continuously:

- improve provided information,
- build and strengthen internal capacity, and
- continuously assess communication assets and channels.

During the year we made further efforts to improve the accuracy and level of detail of our communications. One specific action was the introduction of more precise and detailed information related to the materials used in our products and the standards adhered to.

Additionally, we continue scrutinizing existing consumer communication on both the product level and the brand level, and we have a specific focus on building internal capacity related to sustainability communication and how it relates to future legislation.

We understand that this will remain a continuous effort. Each year we use our customer survey to evaluate how well consumers perceive they can make informed choices; this helps us to understand how well our overall approach and our current actions resonate with our customers.

Sustainability-related communication can at times be complicated and nuanced. In case any misleading information is discovered, there are action plans in place to guide next steps, which may be the adaption of the information, removal of the information, or even removal of the product.

While we aim to eliminate any potentially misleading communication, we also acknowledge that simply stopping all sustainability-related product and brand communication can't be the way forward either.

This is why we see legislative developments, such as the Green Claims Directive, as a welcome opportunity to establish common standards on how to talk about sustainability across brands and sectors, which can allow consumers to make better-informed decisions.

Targets

At C&A, we want to enable our customers to make informed choices by providing transparent information about C&A's products and the brand. We set ourselves the specific target that by 2028, 55% of C&A's customers perceive that they can make informed choices when shopping at C&A. This target is also embedded in the overall C&A Sustainability Strategy.

This target has been established through internal consultation across multiple departments. Progress against the target is measured through an annual consumer survey.

Results are published in the progress update of our annual Sustainability Report.

Consumer Protection & Data Privacy



Strategy

All our customers face the risk of unauthorized access to credit card and personal information due to large transactions. The threat of data breaches from hacker attacks is constant, and consumer data is particularly vulnerable when stored by external providers. This risk increases as our C&A membership base grows. Unfortunately, databases (especially those in distributed systems) are susceptible to unauthorized third-party attacks. Once compromised, the damage to data is irreversible. While C&A doesn't collect critical customer data directly, customers may share information on social media that could also be exploited.

As more of our consumers are engaging with us digitally, we know that they are entrusting us with their personal and financial data. Consumer protection and data privacy are two topics we take very seriously at C&A. Our policies are aligned with internationally recognized principles of corporate governance and ethics, including the OECD Principles of Corporate Governance and the UN Global Compact. We promote transparency, accountability, and integrity in our data processing practices, adhering to ethical standards that enhance trust and confidence among stakeholders.

Consumers engaging with C&A are subject to both benefits and to risks. Most notably in terms of benefits, we offer quality and long-lasting fashion at affordable prices for all consumers. We do not sell inherently harmful products, and we have high standards for protecting our consumers' data (see more below) and our human rights and ethics policy aims to ensure that discrimination and freedom of expression is not an issue.

Our operation of retail stores also has a positive impact on communities by stimulating economic growth, and our community engagement activities build trust and cohesion.

Policies

GROUP CONSENT POLICY

Both the General Data Protection Regulation (GDPR) and the UN Global Compact emphasize the importance of respecting human rights. The GDPR governs the way in which C&A can use, process, and store personal data. It applies to all C&A entities within the EU, as well as those supplying goods or services to the EU or monitoring EU citizens. The GDPR ensures that individuals' rights to privacy and data protection are upheld by requiring organizations to obtain consent for data processing, provide transparency about data practices, and enable individuals to exercise their rights regarding their personal data. By complying with GDPR requirements, C&A demonstrates our commitment to respecting individuals' rights, and our alignment with the UN Global Compact's principles on human rights.

The General C&A “Group Consent Policy” governs our actions related to customer and end-user consent, and

includes provisions for:

- Determining what disclosures should be made to obtain valid consent.
- Ensuring the request for consent is presented in a manner which is clearly distinguishable from any other matters, is made in an intelligible and easily accessible form, and uses clear and plain language.
- Ensuring the consent is freely given (i.e. is not based on a contract that is conditional to the
- Processing of Personal Data that is unnecessary for the performance of that contract).
- Documenting the date, method and content of the disclosures made, as well as the validity, scope, and free will of the consent given.
- Providing a simple method for a data subject to withdraw their consent at any time.

POLICY FOR PROTECTION OF PERSONAL DATA

The C&A "Corporate Policy for Protection of Personal Data" serves as a comprehensive framework for safeguarding sensitive information and as a fundamental tool for ensuring legal compliance, managing risks, standardizing practices, protecting sensitive information, fostering employee awareness, and building trust with customers and stakeholders.

This Policy applies to all companies of the “C&A Group” and all its dependent Group companies, subsidiaries, branches, and controlled companies (“C&A Group companies”). C&A AG may enforce the adoption of this Policy.

The employees, contractors, and agents of the C&A Group are obliged to comply with this Policy whenever the employees process personal data in connection

with or in the context of the performance of their job responsibilities for a C&A Group company. The requirements and prohibitions of this Policy apply to all processing of personal data, whether in electronic or paper form. They also include all types of affected data subjects (e.g. customers, employees, suppliers, etc.) in their scope of application.

In case of a conflict between the provisions of this Policy and national or supranational law, the latter will take precedence.

The Policy is easily accessible to all employees and managers at all times via the C&A intranet.

- Its purpose encompasses several key aspects:
- **Legal Compliance:** Data protection laws, such as the GDPR, require C&A to implement measures to protect the privacy and rights of individuals' data. A group data protection policy ensures that the organization adheres to these legal requirements, avoiding potential fines and legal consequences for non-compliance.
 - **Risk Management:** By outlining clear guidelines and procedures for handling data, the policy helps mitigate the risk of data breaches, unauthorized access, and other security incidents. This proactive approach reduces the likelihood of financial loss, reputational damage, and loss of customer trust associated with such incidents.
 - **Consistency and Standardization:** In a group, consistency in data protection practices is crucial. The unified data protection policy ensures that all entities, departments, and employees follow the same standards and protocols, promoting coherence and

- efficiency in data handling processes.
- **Protection of Sensitive Information:** The policy and its attachments describe the types of data collected, how it is stored, processed, and shared, and who has access to it. This clarity ensures that sensitive information, such as personal data or proprietary business secrets, is adequately protected from unauthorized disclosure or misuse.

ADDITIONAL SAFEGUARDS FOR PROTECTING DATA PRIVACY

Additionally, there is a general C&A AG “Information Duties to Data Subject” policy. C&A has created a website that can be reached out under the address: www.c-a.com/GDPR. This site contains information notices for the core data processing activities within C&A. If the data processing occurs on another site (e.g. Online shop, Corporate), the respective site has its own data protection notice.

Finally, there is a formal C&A Data Protection Impact Assessment Methodology in place for each C&A entity to use. This aims to ensure that a Data Protection Impact Assessment (DPIA) is conducted, where necessary, in cooperation with the DPO, for all new and/or revised systems or processes with potential high risk for the data subject. A DPIA is an assessment of potential risks and mitigation measures for defined processes. A DPIA is necessary for processes which use new technologies as automated decisions including scoring or data mining with a large scale of data or which bear high risks because of monitoring behavior or sensitive data (e.g. special categories of data).

HOW WE MANAGE SPECIAL CATEGORY DATA
We also have in place a General C&A “Special Category Data” Policy. Special category data is personal data which the GDPR says could be a reason for discrimination. To lawfully process special category data, both a lawful basis under Article 6 and a separate condition for processing special category data under Article 9 must be identified. These do not have to be linked. C&A must determine its condition for processing special category data before beginning this processing under the GDPR.

HOW WE ADDRESS A DATA BREACH
Our “Breach Notification Policy,” which is available on our Data Protection Intranet, explains that the Data Protection Officer shall lead the investigation and manage the breach and immediately inform the data protection and IT security department. Once the breach is identified, C&A will implement any steps necessary to contain the breach (such as removing access, removing data, etc). If relevant after carrying out a risk analysis, the Data Protection Authority shall be informed.

The decision regarding the notification to the Supervisory Authority and Data Subject must be made considering the risks to the rights and freedoms of the affected Data Subject. As this is a very important decision, senior management at C&A will be made aware if the Supervisory Authority is notified of a data breach.

The relevant processes are subject to periodic checks by the Group Data Protection Manager (or its designee) or external consultants. If a potential for improvement is identified, the competent department will take prompt

remedial action. The findings of the checks shall be documented in writing. The documentation will be handed over to the local Data Protection Officer, the respective company management, and the persons responsible for the respective process in the pertinent department. The data subject will be informed as soon as possible of any measures taken. In all forms of internal investigations, the local Data Protection Officer will be involved in advance regarding the selection and design of the measures.

Grievance Mechanism in Place for Data Privacy Issues

Consumers and end-users wanting to raise concerns directly with C&A can contact customer service or use our dedicated channel by reaching out via email to dataprotectiononline@canda.com.

When a complaint is submitted via email to dataprotectiononline@canda.com, it is promptly addressed by a dedicated member of the Data Protection Team who monitors the mailbox daily. Complaints submitted through the customer service portal are immediately reviewed and assigned to a caseworker from the Data Protection Team, initiating an investigation without delay.

Additionally, complaints submitted through the Fairness Channel are immediately reviewed and assigned to a caseworker from the Data Protection Team, initiating an investigation without delay.

Those reaching out have the option to submit reports anonymously, ensuring no personal data is collected.

If any conclusions can be drawn about the individual's identity based on the provided information, it will automatically be treated as confidential. To maintain trust, only designated employees, who are permanently assigned to this task and bound by confidentiality agreements, review the cases raised.

Social *Inclusion*



Strategy

Reflecting society’s diversity can benefit our communities and our business. By understanding and meeting consumer demands, we can enhance customer satisfaction and loyalty. Embracing social inclusion allows us to attract a broader customer base, increasing market share and brand loyalty.

A lack of social inclusion can have detrimental effects. Exclusionary practices can expose a company to legal challenges and financial penalties. Moreover, when business leadership and company practices do not reflect the diversity of its consumer base, a gap is created between a company and its customers. This disconnect can result in feelings of exclusion among consumers, who may choose to take their business elsewhere.

Customer exclusion is particularly sensitive in today’s diverse society, also potentially leading to negative publicity, social media backlash, and reputational harm. A lack of cultural sensitivity and sexism can have particularly detrimental effects, such as irreversible reputational damage.

While all consumers can be affected by a lack of respectful and considerate retail

practices, people from underrepresented groups can be more profoundly impacted due to their historically marginalized status or systemic biases in the environment. This includes women, people of color, people from minoritized religions, LGBTI+ people, people with disabilities, and others. Systemic negative impacts in marketing or product offerings that consistently objectify, misrepresent, or exclude women and people from underrepresented groups may lead to the alienation of these consumers and can reinforce stereotypes and marginalization. Inclusive retail practices, on the other hand, can have a wide range of positive impacts on consumers of diverse identities. Our action plans are designed to proactively embed consumer inclusion into our product design, selling, and marketing efforts. We also offer targeted actions to address specific needs. These initiatives are being rolled out incrementally as part of our multiannual Equity Strategy.

Beyond demonstrating our commitment to doing what is right, the benefits of our approach to inclusivity are already visible. For C&A, in particular, body size inclusivity has positive material effects. Embracing body size diversity is meeting a significant consumer demand and can drive customer loyalty. Ignoring body size inclusivity can lead to lost sales and negative brand perception. Additionally, ensuring that our products, stores, and online platforms are accessible to all, including people with disabilities, can significantly broaden our customer base.

Affordability is another crucial lens on inclusivity that we aim to incorporate into our approach. By offering inclusive products at affordable prices, retailers such as C&A ensure that all consumers have equal access to products for long-term enjoyment and comfort. Offering discounts further supports this approach, respecting the financial realities of consumers.

Finally, an important positive impact of affordable fashion offered by C&A is democratizing sustainability, ensuring that people with limited financial resources can align their purchases with their own values related to the environment and human wellbeing.

Ultimately, reflecting society’s diversity supports social equity but also strengthens our business and positions us for long-term success.

Policies

C&A’s Human Rights and Equity Policy underscores our commitment to respecting human rights and fostering equity and inclusion for all stakeholders, including consumers. This policy aims to prevent negative impacts on consumer rights and proactively addresses any issues that arise, ensuring that consumer rights are respected across all business practices.

The Human Rights and Equity Policy covers all C&A operations affecting consumers and end-users, including product safety, marketing, customer service, and data protection. It applies to all affected stakeholders with no significant exclusions.

The European Leadership Team ultimately has responsibility for implementing the Human Rights and Equity Policy. The Human Rights Governance Council, which includes senior leadership, oversees and monitors implementation.

The policy is communicated through C&A’s official website, annual reports, and internal communication channels. Awareness efforts are conducted to ensure that employees, suppliers, and business partners understand and implement the policy effectively. The policy is available to interested consumers, end users, and their organized representatives through our corporate website.

C&A’s policy approach is based on internationally recognized human rights standards and aligns with the following instruments:

- UN Guiding Principles on Business and Human Rights
- International Bill of Human Rights
- UN Global Compact
- ILO Declaration on Fundamental Principles and Rights at Work
- OECD Guidelines for Multinational Enterprises

Our Human Rights and Equity Policy translates into concrete stances on how we approach our retail environment, our marketing, and our community impact.

OUR STANCE ON THE INCLUSIVE RETAIL ENVIRONMENT:

We welcome consumers of all ages, abilities, body types, genders, sexual orientations, ethnicities, and backgrounds. We develop products that cater to our diverse customer base. We are committed to eliminating discrimination in all forms, ensuring that all consumers are treated equally and with respect.

OUR STANCE ON RESPONSIBLE AND INCLUSIVE MARKETING:

We reflect and celebrate the diversity of our customers through inclusive marketing practices, and proactively break stereotypes. We ensure that marketing strategies do not have unintended negative impacts, particularly on vulnerable groups. We take particular care in how children are featured in marketing, ensuring their rights and interests are centered and protected.

OUR STANCE ON COMMUNITY IMPACT:
We support positive outcomes for local communities through job creation and a community impact program. We engage with community representatives and civil society organizations to improve human rights performance.

Stakeholder Engagement on Inclusion

We conduct ongoing stakeholder consultation to ensure that our policies reflect diverse perspectives and promote equitable outcomes. C&A engages with various stakeholders, including consumers, community representatives, civil society organizations, and groups from underrepresented communities.

C&A values consumer feedback and engages in regular dialogue through customer service channels, surveys, and direct outreach. This engagement helps us understand consumer needs and improves human rights performance.

We have also established the Fairness Channel, a grievance and whistleblowing mechanism to address the human rights concerns of all our stakeholders, including consumers. The channel is easily accessible and prominently displayed on our corporate website. We investigate all complaints, including consumer complaints, promptly and take corrective actions where applicable.

PROGRESS UPDATE
We believe that an open, pluralistic society based on human rights and the rule of law is the best environment for business. We also believe that equality is a cornerstone of human dignity, and we strive to contribute to a more equal society.

Actions

Our specific commitment to positive action on social inclusion is in our 2028 Equity, Inclusion & Human Rights Strategy (Equity Strategy), and further translated into annual action plans. This year, we focused on collaborating with like-minded community groups and civil society organizations. We also leveraged our brand influence and outreach to promote inclusion.

On the occasion of IDAHOBIT 2023, the International Day Against Homophobia, Biphobia, Intersexphobia, and Transphobia, we launched a consumer advocacy campaign, “Proud to Know You,” focusing on the experiences of transgender, non-binary, and asexual people. The campaign shared compelling stories, highlighting actions everyone can take to join the allyship movement. This initiative featured a dedicated capsule collection, with profits donated to IGLYO, a global youth development organization, to support LGBTI+ youths experiencing multiple forms of disadvantage.

Within the framework of the C&A Community Impact program, grant support from the COFRA Foundation was allocated to 37 causes, totaling two million euros in employee philanthropy in 2023. The continued focus of this work has been on supporting social mobility for youths impacted by intersectional inequality.

Some grants were also targeted to support women subjected to domestic violence. While our primary focus has been on our retail market countries, support for humanitarian relief has also been provided to organizations active in Ukraine and Morocco.

Inclusion-Related Incidents

During the fiscal year 2023, C&A received 44 consumer complaints through our Fairness Channel. Ten of the 44 complaints were related to human rights, and seven were confirmed to, more likely than not, include elements of discrimination or harassment. Three were related to behavior by C&A employees, three were about external agency staff, and one reported a violation by another customer committed on C&A premises.

Proportionate and appropriate actions have been taken to address these complaints, including preventive actions.

No severe human rights issues and incidents connected to customers and/or end-users were reported.

Targets

Our 2024 plan includes a range of activities to foster social inclusion for our consumers, including the following:

- Introduction of an inclusion training for marketing professionals to ensure marketing practices are diverse and inclusive.
- Anti-racism training: mandatory racism awareness training for all retail workers to promote an inclusive and respectful environment for all consumers.
- Preventing profiling: implementing measures to prevent ethnic profiling by staff of third-party security providers on our premises, ensuring all customers are treated with dignity and respect.



Our sustainability approach is centered on the ambition to do what's best for people and the planet. To achieve that goal, we need to start with how we conduct our business. We have been intentional about how we have created and maintained our internal culture. Read more below about how our policies and systems support our values of integrity, fairness, and transparency in our internal operations and our external relationships.



Governance



Corporate Culture

Corporate culture at C&A highlights integrity, inclusion, fairness, and transparency, with our C&A Code of Ethics and Conduct forming the backbone of our commitment to responsible business conduct.



The C&A Code of Ethics and Conduct is regularly communicated to all employees. This is done through notices on the C&A intranet, a permanently available page on the intranet with a summary of the key points, e-learning sessions, and from time to time via screensavers. C&A provides its employees with mandatory e-learning sessions for each chapter with

a final quiz in the C&A internal online learning platform. These online training sessions are complemented by special modules for employees in the distribution centers and stores that have no access to the internal learning platform. All new employees are automatically assigned to the training.



In alignment with legal requirements and in accordance with the German Supply Chain Act and the national implementation laws of the Whistleblower Directive, C&A maintains an internet-based reporting channel called the C&A Fairness Channel.

The Fairness Channel is a portal through which any person, regardless of whether their own rights are affected or not, can provide information in accordance with the German Supply Chain Act and European Whistleblower Directive and report violations of the law, including violations of EU law in the areas specified in the European Whistleblower Directive. As a first step, reporters can select one or more of the main categories which are “Protection of human rights,” “Environmental protection,” or “Corruption, fraud, compliance and other complaints,” each of which is divided into various sub-categories.

C&A is committed to investigating business conduct incidents promptly, independently, and objectively. To guarantee a bias-free and objective investigation of complaints, C&A established a code of procedure of the Fairness Channel.

- Upon receipt of a report, it will be assigned to a person responsible for handling reports (“Case Handler”). If Reports are submitted by email or post, they should be treated as confidential and forwarded to Case Handlers. The reporting person will receive a confirmation of receipt immediately, but within seven days at the latest.
- Once the nature of the report has been determined and the report is deemed legitimate, the person responsible for handling the report will initiate an

official investigation. This investigation may include, among other things, a review of the facts, interviews, and a discussion with the reporting person. Complaint investigations should be appropriately documented, treated as confidential to protect all affected parties and impartial, free from attempts to influence the outcome. During and after the investigation, care is always taken to ensure that the reporting person is protected from discrimination or reprisals.

- When a rights violation or risk has been identified, C&A will take appropriate preventive or corrective measures independently, or in direct contact with the affected business partners or suppliers where appropriate, in accordance with applicable law, C&A's policies, and our non-negotiable commitment to equity, inclusion, and human rights. C&A will decide on the suitability of these measures on a case-by-case basis.

As a rule, the processing of a report will be completed within three months of receipt. The reporting person will receive feedback within three months of receiving the report. Such feedback will not affect internal inquiries or investigations or the rights of the persons who are the subject of or named in the report.

The Fairness Channel is available in 32 languages to allow unrestricted access via [this link](#).

Supplier *Relations*

C&A aims to establish long-term relationships and strong partnerships within our supply chain to build the necessary understanding between merchandise suppliers and C&A, which often translates to multi-year sustainability investments.



Through these partnerships, we engage in regular discussions to identify areas for improvement, and we also use the biannual C&A Score Card to facilitate fact-based conversations and drive enhancements.

C&A is committed to continuously reflecting on potential negative impacts within our supply chain. To that end, C&A is a long-standing member of the ACT (Action, Collaboration, Transformation) initiative. As a member of ACT, C&A is dedicated to upholding responsible purchasing practices, which are formalized through our Responsible Purchasing Practices Policy and Responsible Exit Policy. C&A's framework agreements with clothing suppliers also include clauses that consider human rights-sensitive contract design approaches.

When establishing new relationships with potential merchandise suppliers, social and environmental factors are part of the multi-layered decision-making process. These stringent criteria form an integral part of C&A's onboarding process. If a supplier fails to meet these criteria, they will not be accepted as a C&A merchandise supplier until significant violations are rectified, or they will not be approved for C&A production.

C&A suppliers must accept the C&A Code of Conduct as a prerequisite for doing business with us. Suppliers must ensure that the C&A Code of Conduct is printed and posted in a conspicuous place so that workers can read it in their production units and/or at third party sites in their local language. C&A provides translations in various languages for this purpose.



Corruption & Bribery

Employees

In accordance with the UN Convention on Anti-Corruption, the C&A Code of Ethics and Conduct and the C&A Code of Conduct contain guidelines for all C&A employees and suppliers to prevent and detect corruption, bribery, and conflicts of interest, as well as for the promotion of good business practices.

The Code of Ethics and Conduct contains a separate section regarding anti-corruption and anti-bribery, which applies to all C&A employees. We expressly prohibit our employees from engaging in any illicit financial activities including corruption, bribery, and money laundering. C&A strives to be aware of any signs of corruption, bribery, and money laundering, and to minimize risks and raise concerns promptly.

Therefore, C&A requires all employees to:

- not take unfair advantage through manipulations, concealment, misuse of privileged information, misrepresentation of facts, or any unfair practices;
- never offer or accept bribes; take steps to prevent bribery by others acting on our behalf, for example, by conducting proper checks on third parties we work with;
- report any suspicions of bribery immediately;

- avoid cash transactions, except for sales transactions conducted through our points of sale;
- not accept or offer anything that could create an appearance of obligation or harm C&A’s independence;
- not engage in the facilitation of payments;
- grant benefits to business partners, customers, or other third parties only in compliance with the law;
- always abide by existing rules;
- avoid actions that may violate money laundering laws; and
- show zero tolerance for incompliant behaviors from anyone representing C&A and immediately report any suspicious conduct to the line manager, the local Legal Counsel, the Compliance Officer or through the C&A Fairness Channel.

EMPLOYEES COVERED BY ANTI-BRIBERY AND CORRUPTION TRAININGS

All C&A employees – including the members of the management board – receive periodic trainings on the Code of Ethics and Conduct, including on behavior to prevent corruption and bribery. However, there is not dedicated anti-bribery or anti-corruption training for managers.

The members of the supervisory board are all external parties to ensure their objectivity and independence. Therefore, they do not receive C&A's internal trainings on the Code of Ethics and Conduct.

SOURCING TEAMS

Functions that are most at risk for corruption and bribery are in general those in the areas of sourcing and buying. These functions are responsible for direct

procurement activities, such as ordering merchandise from manufacturers and suppliers.

To raise sourcing employees’ awareness for integrity topics, there is a quarterly e-newsletter for the global sourcing units, available via the Sourcing Intranet, in which the Integrity department regularly publishes an article. The topics vary from reminders of the Sourcing Code of Ethics provisions to impending or recently completed training activities. The e-newsletter is complemented by ad-hoc cases and experiences shared with specific teams or offices by the Integrity department, either upon request from managers or initiated by Integrity on an as-needed basis. There are also ad-hoc one-on-one catch-up meetings by Integrity with managers from different units and departments to raise their awareness of unethical misconduct. Additionally, regular reminders of C&A’s Gifts & Entertainment policy are sent to the C&A suppliers and factories.

In addition to all mentioned above, there are training activities for the global sourcing units which focus on anti-corruption and anti-bribery training. These are:

- Integrity sessions face to face or via video call, which cover topics like bribery, conflict of interest, gifts and entertainment, fraud, and whistleblowing for new employees in sourcing.
- Integrity refreshers session for all sourcing employees every 18-24 months that cover the topics of the onboarding integrity session again.

SUPPLIERS

The C&A Code of Conduct forms an integral part of C&A’s contractual agreement with our suppliers. It is

a document that all suppliers must access, read, and understand. Additionally, all suppliers must ensure that all their production units and/or third parties involved in the production or delivery of merchandise to C&A adhere to it. C&A expects every supplier to cascade our requirements to their sub-contractors and pre-suppliers in accordance with C&A’s Terms & Conditions. C&A expects suppliers and business partners to adhere to high ethical standards in business practices. Therefore, suppliers and business partners must comply with all applicable anti-bribery and corruption laws. They are strictly prohibited to offer, pay, solicit, or accept bribes, including facilitation payments. Suppliers and business partners must have anti-corruption policies and procedures in place and review them regularly to ensure that they are operating effectively.

Suppliers must also complete the required trainings which are similar to those mandated for employees. For example:

- Integrity session via videocalls for new suppliers and garment factories. These cover similar topics as employees’ sessions but with different perspectives and materials, plus a section on establishing their own integrity program.
- Integrity refresher sessions for all suppliers and garment factories every 18-24 months.
- A video presentation of a shortened version of the above is hosted on the C&A online supplier area for all supplier-onboarding. Also, a written confirmation of completion is required to be uploaded along with other business documents before a new supplier’s account can go live.

DETECTION OF CORRUPTION AND BRIBERY

To ensure compliance with anti-corruption and anti-bribery regulations and C&A’s standards, C&A conducts regular internal and external audits to identify corruption and bribery risks in our global sourcing offices. In addition, ethical perception surveys are regularly conducted at suppliers and factories. Regular meetings of the Sourcing Integrity Committee, consisting of the Head of Sourcing, the P&C Lead Asia and the Senior Manager Integrity, are held to assess and review ongoing investigations, potential risks and trends, and training needs. In addition, the C&A Integrity Department conducts ad hoc meetings with hub managers, business heads and functional heads to understand their risks and needs.

The C&A Code of Ethics and Conduct also stipulates that suppliers are selected solely based on objective and factual criteria that are aligned with C&A's business needs. Therefore, C&A requires our employees to avoid all actions and decisions that could lead to potential conflicts of interest and to strictly adhere to C&A procurement standards and procedures. All employees must avoid any form of preferential treatment throughout the supplier relationship. To ensure this, we adhere to a strict dual control principle in the approval process for all financial engagements. In addition, C&A conducts an annual declaration of conflicts of interest in our Global Sourcing Offices.

An allegation of corruption and bribery will be investigated through a fact-finding process to confirm or disprove a suspicion.

MITIGATION OF CORRUPTION AND BRIBERY

The management board as well as the supervisory board are regularly informed about material compliance cases, including corruption and bribery, as part of the supervisory board meetings.

Incidents of corruption or bribery which are reported via C&A's Fairness Channel are investigated by the legal department. The Sourcing Integrity Committee which consists of the Head of Sourcing, the People and Culture Lead Asia, and Senior Integrity Manager, are responsible for incidents that relate to the global sourcing units.

INCIDENTS OF CORRUPTION AND BRIBERY IN 2023

- Number of convictions for violation of anti-corruption and anti-bribery laws: None.
- Amount of fines for violation of anti-corruption and anti-bribery laws: None.
- Number of confirmed incidents of corruption or bribery: Two (both bribery).
- Number of confirmed incidents in which own workers were dismissed or disciplined for corruption or bribery-related incidents: Two.
- Number of confirmed incidents relating to contracts with business partners that were terminated or not renewed due to violations related to corruption or bribery: None.

Whistleblowers

PROTECTION POLICY

C&A doesn't have a policy for whistleblower protection on our own. Nevertheless, multiple C&A policies, guidelines, and standards contain measurements and regulations for whistleblower protection, such as the C&A's Code of Ethics and Conducts, the Code of Procedure of the Fairness Channel, and the C&A Code of Conduct.

EU WHISTLEBLOWER DIRECTIVE

As C&A has registered offices in Germany and meets the threshold of 50 employees, C&A is subject to the EU whistleblower directive (Directive (EU) 2019/1937). We fulfill our obligation resulting from the German regulation to transform the directive into national law (Hinweisgeberschutzgesetz) by maintaining the C&A Fairness Channel ([p.77](#)).

Whistleblower Safeguards and Protections

C&A believes that whistleblowing plays an important role in detecting misconduct and ensuring compliance with legal requirements and internal policies and is essential to maintaining the integrity and promoting ethical behavior. All employees have the right to make formal complaints to C&A, including those relating to non-compliance with C&A’s Code of Ethics and Conduct, without fear of retaliation. C&A's Code of Ethics and Conducts strictly prohibits any form of retaliation against anyone who raises a concern in good faith within C&A's own business.

Reports may be made confidentially or anonymously, and C&A will protect the privacy of those who report issues anonymously or confidentially and take steps to protect them from retaliation. C&A employees responsible for receiving and processing reports are bound by confidentiality obligations by applicable law and C&A policies. The C&A employees who investigate and handle cases that C&A receives via the Fairness Channel are required to protect bona fide whistleblowers from retaliation.

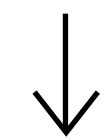
The C&A Code of Conduct also requires all C&A suppliers and business partners to implement effective grievance mechanisms and to inform their employees that they can use these grievance mechanisms to report concerns and complaints about working conditions or other issues without fear of reprisal, intimidation, harassment, or discrimination. Workers must be able to report concerns and grievances confidentially. All C&A suppliers and business partners must inform their workers that they can use the C&A Fairness Channel.

C&A will not tolerate discrimination or retaliation against complainants or whistleblowers who report concerns in good faith. Therefore, C&A is committed not to retaliate against our own employees who provide information in good faith about alleged misconduct. The Case Handlers monitor C&A's compliance with this commitment. These are employees who are obliged

to maintain independence. Regarding C&A suppliers, any violations of the provisions of the C&A Code of Conduct may lead to termination of the business relationship. This also applies to cases in which suppliers take retaliatory measures against their own employees who report alleged misconduct in good faith.

Animal Welfare

C&A has a long-standing commitment to animal welfare, as outlined in our [Animal Welfare Policy](#). In accordance with our Animal Welfare Policy, we expect our supply partners to abide by the internationally accepted concept of the Five Freedoms:



- 1. Freedom from Hunger and Thirst - by ready access to fresh water and a diet to maintain full health and vigor.
- 2. Freedom from Discomfort - by providing an appropriate environment including shelter and a comfortable resting area.
- 3. Freedom from Pain, Injury or Disease - by prevention or rapid diagnosis and treatment.
- 4. Freedom to Express Normal Behavior - by providing sufficient space, proper facilities and company of the animal's own kind.
- 5. Freedom from Fear and Distress - by ensuring conditions and treatment which avoid mental suffering.

Under no circumstances will C&A accept any materials from exotic, threatened, or endangered species as defined by the CITES agreement and the IUCN Red List. Our approach to ensuring this is based on improving traceability from the farm to the final product.

We work hand in hand with stakeholders when it comes to animal welfare. C&A sets, defines, and implements industry-level solutions with animal welfare organizations (e.g., Four Paws), other brands, retailers, suppliers, and independent auditors. C&A is a member of the Textile Exchange, which oversees several certification programs for responsible animal-derived fibers, including the Responsible Down Standard (RDS), Responsible Wool Standard (RWS), and others.

ESRS Index Table



Our Sustainability Report 2023 has been guided by the European Sustainability Reporting Standards (ESRS) Framework. As our reporting is in the process of transitioning towards meeting CSRD requirements, our disclosures do not yet comply with all aspects of ESRS. We will be improving our disclosures in the upcoming reporting periods.

SECTION	ESRS STANDARD	DISCLOSURE REFERENCE	DISCLOSURE REQUIREMENT	DISCLOSURE PARAGRAPHS	SUSTAINABLE DEVELOPMENT GOALS	UN GUIDING PRINCIPLES	PAGES
General disclosures	General disclosures (ESRS 2)	BP-1	General basis for preparation	5a, 5bi, 5bii, 5c	SDG 16: Peace & Justice	UNGC Principles: 13, 14, 17, 18	<u>9</u>
		BP-2	Disclosures in relation to specific circumstances	9, 9a, 10, 10a, 10c, 10d, 11a, 11bi, 11bii, 12, 13a, 13b, 14a,14b, 17, 17a, 17b, 17d			<u>9, 11, 12, 15, 17</u>
		GOV-1	Role of the Executive Board and Supervisory Board	21, 21a, 21e, 26a			<u>12</u>
		SBM-1	Strategy, business model, and value chain	40ai, 40aii, 40aiii, 40av, 41, 40e, 40f, 40g			<u>9, 10, 12</u>
		SBM-2	Interests and views of stakeholders	45a, 45a, 45 ai, 45aii, 45aiii, 45aiv, 45b, 45c			<u>12</u>
		SBM-3	Material impacts, risks, and opportunities and their interaction with strategy and business model	48a, 48b, 48ciii, 48g, 48h			<u>13, 15, 16, 19, 27, 35, 37</u>
		IRO-1	Description of the process to identify and assess material impacts, risks, and opportunities	8a, 11, 21, 53a, 53biv, 53ci, 53cii, 53ciii, 53f, 53g, 53h			<u>13, 14, 15, 16</u>
		IRO-2	Disclosure requirements covered by the sustainability statements	58			<u>9, 15</u>
Environmental disclosures	Climate change (ESRS E1)	SBM-3	Material impacts, risks, and opportunities and their interaction with strategy and business model	18	SDG 7: Clean energy SDG 13: Protect the planet SDG 11: Sustainable cities and communities		<u>19</u>
		IRO-1	Description of the processes to identify and assess material climate related impacts, risks, and opportunities	20a, 20b, AR9 E1-3			<u>19</u>
		E1-3	Actions and resources in relation to climate change policies	29b			<u>21</u>
		E1-4	Targets related to climate change mitigation and adaptation	30, 34a, 34b, AR25b			<u>20, 25</u>
		E1-6	Gross GHG emissions	48a, 49a, 49b, 51, 52a, 52b			<u>20</u>

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Environmental disclosures	Pollution (ESRS E2)	IRO-1	Description of the processes to identify and assess material pollution-related impacts, risks and opportunities	AR1, 8b	SDG 3: Good health and well-being SDG 11: Sustainable cities and communities		27 , 35
		E2-1	Policies related to pollution	14, 15a, 15b, 15c, AR12, 62			27 , 28
		E2-2	Actions and resources related to pollution	18, AR13			34
		E2-3	Targets related to pollution	22, 23b, 23c, 25			35
		E2-5	Substances of concern and substances of very high concern	34			31
Environmental disclosures	Resource use and circular economy (ESRS E5)	IRO-1	Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities	AR7a, AR7c, AR7d, AR7e, AR7f	SDG 12: Responsible Consumption SDG 11: Sustainable cities and communities		36 , 37
		E5-1	Policies related to resource use and circular economy	AR9a			-
		E5-2	Actions and resources relating to resource use and circular economy	17, 20b, 20c, AR11			41 , 42 , 43 , 44
		E5-3	Targets related to resource use and circular economy	23, 24, 24a, 24b, 24c, 27			44 , 46
		E5-4	Resource inflows	31a, 31b, 31c, 32			38
		E5-5	Resource outflows	33, 35, 36a, 37a, 37b, 37bi, 37bii, 37c, 37ci, 37cii, 37d, 40			37 , 39 , 40 , 41
Social disclosures	Own workforce (ESRS S1)	SBM-3	Material impacts, risks, and opportunities and their interaction with strategy and business model	14, 14a, 14b, 14c, 14d, 14e, 15, 16, 48a	SDG 10: Reduced inequalities SDG 8: Good jobs and economic growth SDG 16: Peace & Justice	UNGC principles: 15, 16, 19, 20, 22, 29, 30, 31	50 , 51 , 52 , 60
		S1-1	Policies related to own workforce	19, 20, 20a, 20b, 20c, 21, 22, 23, 24a, 24b, 24c, 24d			52 , 53 , 54
		S1-2	Processes for engaging with own workforce and workers’ representatives about impacts	27, 27a, 27b, 27c, 28			53
		S1-3	Processes to remediate negative impacts and channels for own workforce to raise concerns	32b, 32e, 32c, 32d, 33, 34			54 , 55

		S1-4	Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of actions	38c			55
		S1-6	Characteristics of our employees	50a, 50b, 50d, 50di, 50dii, 52, 52a, 52b			56 , 57
		S1-8	Collective bargaining coverage and social dialogue	63b			-
		S1-9	Diversity metrics	66a, 66b, AR71			59
		S1-13	Training and skills development metrics	83a, 83b			58
		S1-17	Incidents, complaints, and severe human rights impacts	103a, 103b, 104a			56
	Workers in the value chain (ESRS S2)	SBM-3	Material impacts, risks, and opportunities and their interaction with strategy and business model	11, 11a, 11b, 11c, 11d, 11e, 12	UN SDG 8: Good jobs and economic growth	UNGC principles: 15, 16, 19, 20, 22, 29, 30, 31	59 , 60 , 65 , 66 , 67 , 68
		S2-1	Policies related to value chain workers	16, 17, 17b, 17c, 18, 19, AR12			60 , 61 , 65 , 66 , 67 , 68
		S2-2	Processes for engaging with value chain workers about impacts	22, 22a, 22b, 22c, 22d, 22e, 23, 24			60 , 61
		S2-3	Processes to remediate negative impacts and channels for value chain workers to raise concerns	27a, 27b, 27c, 27d, 28, AR25			63 , 64 , 65
		S2-4	Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of actions	32a, 32b, 32c, 32d, 33a, 33b, 35, 36, AR28a, AR28b, AR30, AR31, AR36a, AR43, AR44			60 , 62 , 63 , 65 , 66 , 67 , 68

	Consumers and end users (ESRS S4)	SBM-3	Material impacts, risks, and opportunities and their interaction with strategy and business model	10, 10a, 10b, 10c, 10d, 10aiii, 11, 12, 48a	SDG 3: Good health	UNGC principles: 15, 16, 19, 20, 22, 29, 30, 31	69 , 70 , 71 , 73
		S4-1	Policies related to consumers and end users	15, 16, 16a, 16b, 16c, 17			69 , 71 , 72 , 74
		S4-2	Processes for engaging with consumers and end-users about impacts	20, 20a, 20b, 20c, 21, 25a, 25b			70 , 72
		S4-3	Processes to remediate negative impacts and channels for customers and end-users to raise concerns	25a, 25b, 25c, 25d, 26			70 , 72 , 73
		S4-4	Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of actions	15, 16a, 16b, 16c, 31a, 31b, 31c, 32c, 35, AR25d, AR25c			70 , 72 , 74 , 75
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