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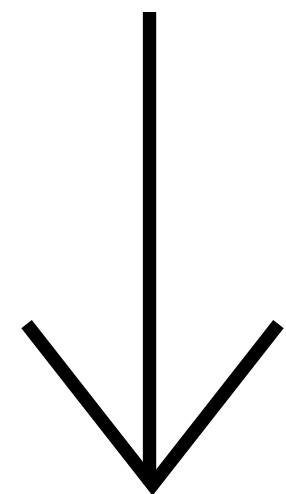
# Sustainability Report

A

A look back at  
our 2024 journey



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# Leadership Letter

Since 1841, C&A has stood for fashion with a purpose: making great style accessible while taking responsibility for people and our planet. Today, this vision continues to guide us as we navigate an increasingly complex and rapidly evolving landscape.

Across our industry, expectations are rising – from customers seeking more transparency and value, from regulators demanding greater accountability, and from partners looking to drive meaningful change. At C&A, we welcome these developments. They encourage us to keep strengthening our sustainability ambition and to embed responsible practices deeper into the way we work every day.

In 2024, we continued to advance our sustainability agenda by reinforcing the foundations for lasting impact. We deepened collaboration with our suppliers to strengthen responsible sourcing practices and reaffirmed our climate ambition through a renewed

formal commitment to the Science Based Targets initiative. This period also marked a phase of recalibration, as we focused on improving data accuracy, enhancing traceability, and aligning material sourcing more closely with evolving sustainability criteria. These efforts are part of our dedication to building a more robust and future-fit approach – one that prioritizes integrity, transparency, and long-term progress.

Looking ahead, we are shaping a refreshed strategy that will guide our actions through 2030. It will build on our strong foundations, with even clearer direction for how we enhance supplier performance, improve our environmental and social footprint, and make our value proposition more sustainable – without compromising on affordability and offering styles that are inclusive, timeless, and attuned to customer demand.

Progress is built on both successes and lessons learned, and each step helps us refine our approach. With a long-term perspective and a deeply committed team, we're confident in the path forward. Together, we are building a more responsible, resilient, and future-fit C&A – one that continues to deliver on the promise we honor over generations.

C&A Leadership Team

# Our Approach

C&A's sustainability approach is designed to support our purpose: to inspire everyone, every day, to look, feel, and do good.



Our sustainability practices are integrated across every stage of our products’ lifecycle, and are built upon strong pillars of equity, inclusion, and human rights. We have set specific priorities related to environmental, social, and governance topics, and within these areas we are committed to:

- reducing negative environmental impacts;
- improving the well-being of people in our value chain; and
- integrating sustainability into our business decisions.

We are committed to deepening our engagement with stakeholders to ensure that the perspectives of affected groups and their advocates inform our sustainability journey, to co-create solutions and to ensure our actions reflect shared expectations.

	ENVIRONMENT	SOCIAL	GOVERNANCE
APPROACH	<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>
PRIORITIES	<ul style="list-style-type: none"> <li>• Significantly reduce CO<sub>2</sub>e Emissions in our own operations and supply chain</li> <li>• Transition to circular resource use</li> <li>• Increase the share of renewable and/or recycled material</li> <li>• Continuously increase the use of safer chemicals</li> </ul>	<ul style="list-style-type: none"> <li>• Respect human rights</li> <li>• Improve working conditions</li> <li>• Ensure health and safety at workplaces</li> <li>• Promote equality, inclusion, equal treatment, and opportunities for all</li> </ul>	<ul style="list-style-type: none"> <li>• Firmly embed sustainability into our business processes</li> <li>• Foster and support ethical business conduct in our own organization and with all our business partners</li> </ul>
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# Achievements

In 2024, we advanced our sustainability agenda across multiple fronts.

*Key achievements include:*

# 34%

of our cotton is sourced as certified organic cotton

We have signed a legally binding agreement with IndustriALL Global Union to support the implementation of factory-level collective bargaining agreements in Cambodia

We reduced the volume of single-use virgin plastic by

# 56%

compared to our baseline

Single-use virgin plastic reduction in stores, ecommerce, and transport compared to baseline 2019.

We enhanced organic cotton traceability by adding a physical and unique DNA marker

# 93%

of chemicals used comply with ZDHC MRSL requirements

Chemical products that are checked and tested against the requirements of the ZDHC Manufacturing Restricted Substances List (MRSL) meeting conformance level 1 or higher.

We increased the share of recycled materials used by more than

# 50%

compared to 2023

Includes certified recycled Cotton, Polyester, Polyamide, Acrylic, Wool and Cashmere

After achieving our GHG reduction target set in 2020, we renewed our SBTi commitment

# 2024 Progress Update

During 2024 we progressed toward many of our long-term goals, acknowledging the urgent environmental and social challenges facing our planet and the shared responsibility to address them. As part of our commitment to climate action and resource stewardship, we continued to lower our greenhouse gas emissions, we consolidated our use of more sustainable materials<sup>1</sup>, reduced our use of virgin plastics, grew our circular products portfolio, and advanced our commitment to animal welfare standards. We have made meaningful progress toward achieving our safe chemistry goal – recognizing the critical role of safer inputs in protecting ecosystems and human health. These efforts reflect our belief that meaningful transformation across the industry requires collaboration and transparency. Throughout this report, we will share additional details on these topics, and on how we are continuing to work toward our goals in other areas such as consumer facing communication.

*We are currently enhancing our strategy with additional goals, revised KPIs, and updated targets. The progress shown in the table refers to previously measured KPIs for better comparability.*

<sup>1</sup> We define a more sustainable, or lower impact material as one that has less of an 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.

<sup>2</sup> CO<sub>2</sub>e emissions reduction compared to 2018 baseline, focusing on GHG emissions covered within the SBT boundary.

OUR GOALS	KPI	BASELINE	2024 PROGRESS	TARGET
Act on clear, regularly reviewed climate change targets	% reduction in absolute greenhouse gas emissions across all scopes, by 2030	3,497,822 tCO <sub>2</sub> e (2018)	-50% <sup>2</sup>	-30% (2030)
Act as an industry leader in increasing the use of sustainable materials	% of core materials sourced more sustainable <sup>1</sup>	68% (2019)	77%	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)	2/10	7/10 (2028)
Pursue the elimination of plastic pollution	% of single-use virgin plastic in our stores, online shop, and transport packaging reduced or replaced with sustainable alternatives	1,840 mt (2019)	-56%	-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)	38%	55% (2028)
Continually improve and secure safe chemicals throughout our supply chain	% of chemicals used that are approved as safe chemicals	79% (2019)	93%	100% (2028)
Protect animal welfare throughout our supply chain	% of core animal-based materials that are certified to defined animal welfare standards	5% (2019)	29%	75% (2028)

# How to Navigate this Report

Building on our long history of voluntary sustainability reporting under the Global Reporting Initiative (GRI) framework, we have enhanced our disclosures by preparing the 2023 and 2024 sustainability reports in alignment with the European Sustainability Reporting Standards (ESRS), as required by the Corporate Sustainability Reporting Directive (CSRD). This progression reflects our commitment to continuous improvement and alignment with emerging regulatory frameworks.

Readers with a CSRD lens should begin with the following chapter, labeled “I. General Information,” which is focused on the required

disclosures under the CSRD. An overview of the impacts, risks, and opportunities (IROs) for each material topic is included in this section, as well as being detailed in each topic-specific chapter.

Readers with a focus on a particular topic may opt to skip directly to the chapter that details that information.

If multiple topic-specific chapters will be read, readers should note that certain information, such as details on selected policies, may be repeated. This is done intentionally with the expectation that many readers will not read the

full report but rather will focus on individual chapters of interest. Additionally, variations in how particular details are presented reflect each chapter’s thematic focus and alignment with CSRD data points, and are intended to reinforce topic-specific insights. For example, our Fairness Channel grievance mechanism is presented from multiple perspectives, and certain policy provisions may be emphasized in one chapter, while others will be emphasized in a different chapter. A more general overview of policies can be found in “IV. Governance” in the section entitled “Policies.”

# General Information

“General Information” includes background information on the preparation of this report, key definitions, and the methodology behind the data that is presented. This section also covers our business model, governance structure, and includes an overview of our material topics and their related impacts, risks, and opportunities.



# Basis and Scope for Preparation

This sustainability report covers data and information specific to C&A's retail, service, holding, and sourcing entities operating within the European market. The reporting boundary includes operations across 17 retail countries, reflecting the consolidated activities of C&A B.V. and its subsidiaries in the European region. →



The report covers the majority of related upstream tiers 1-4 and downstream consumer and end-user activities, our 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 2024 fiscal year (1st of March 2024 to 28th of February 2025) and is consistent with our financial reporting period, ensuring alignment in timing and comparability across disclosures. In select cases, we have found that reporting data according to the calendar year is more meaningful; in such cases, use of the calendar year will be highlighted alongside the data. We report progress annually against the C&A Sustainability Strategy, which serves as our overarching sustainability framework.

This report does not include disclosure requirements from any EU national legislation.

Time horizons referenced throughout this report are defined as follows:

- **Short-term:** the duration of the current reporting period;
- **Medium-term:** the period extending from the end of the short-term horizon up to five years;
- **Long-term:** any period exceeding five years.

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

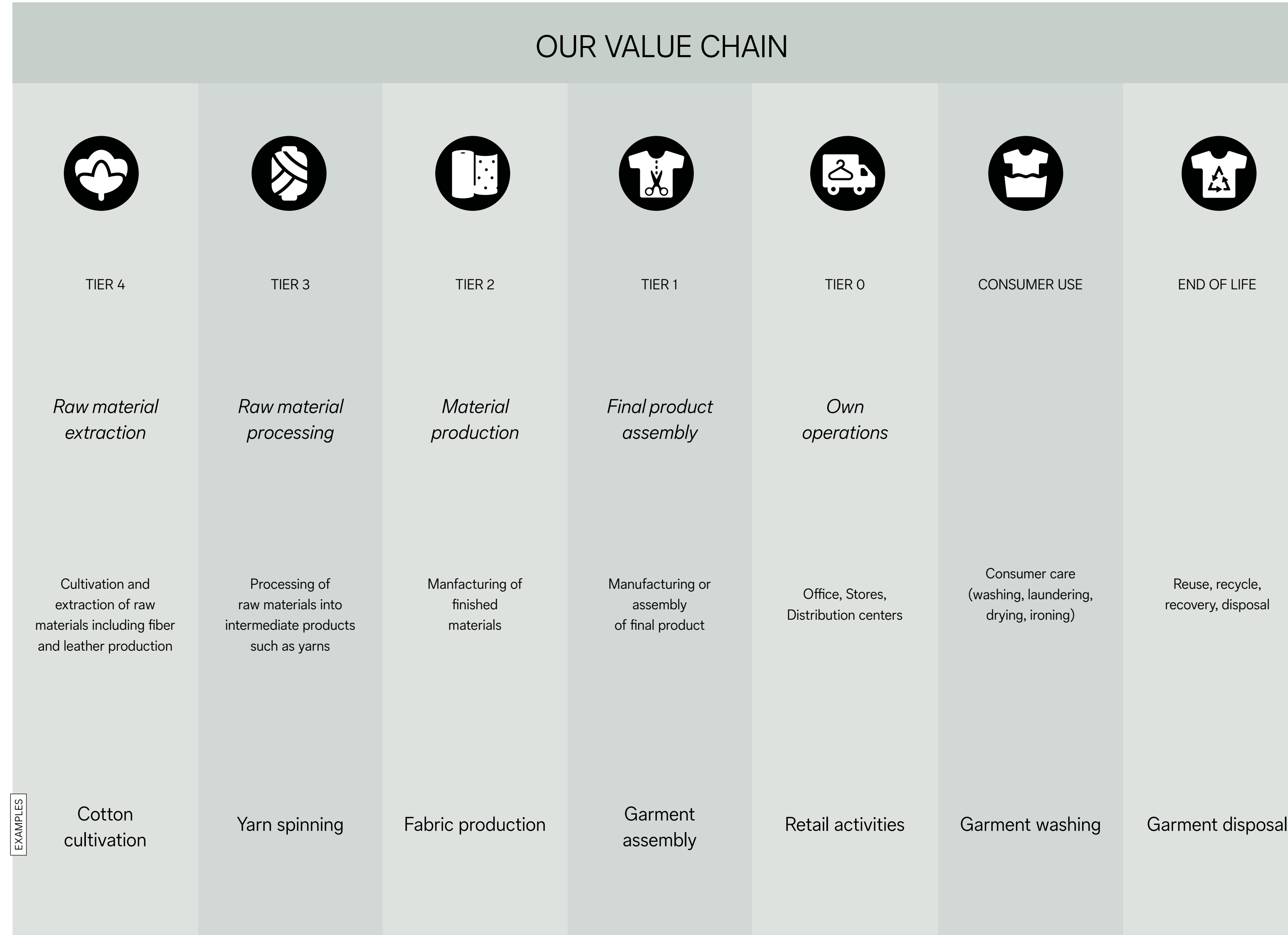
We have mapped our upstream value chain using direct sources of information provided by suppliers. All suppliers are required to disclose their subcontractors and the specific production stages in which they are involved. While the upstream value chain is mapped as comprehensively as possible, particular emphasis is placed on improving data availability and accuracy – especially in the deeper tiers of the supply chain. Mapping subcontractors beyond tier 2 presents greater challenges in terms of data accuracy. Nevertheless, we remain committed to enhancing transparency and traceability throughout our supply chain.

For certain data points, we rely on a combination of direct assessments and informed estimates. Where estimates are applied, a conservative methodology is adopted to ensure the reliability and integrity of the reported information.

Any significant changes in assessment methodologies or data preparation approaches are disclosed in the relevant sections of this report. Compared to previous reporting periods, no major changes have been made to data preparation. Where minor adjustments were necessary to enhance the quality or clarity of information, these are referenced within the respective sections. Many of our 2024 actions build upon strategies and activities from the previous year. In addition, the CSRD framework requires certain disclosures on topics that may not change significantly across reporting periods. Consequently, there are similarities between the two most recent reports, particularly in sections describing policies, strategies, or partnerships that have remained consistent, and where we describe undertakings that span more than a single year.

No material reporting errors have been identified during the reporting period.

Material topics cover E1 Climate Change, E2 Pollution, E3 Water, E4 Biodiversity, E5 Circular Economy and Resource Use, S1 Own Workforce, S2 Workers in the Value Chain, S4 Consumers and End Users, and G1 Business Conduct.



LOGISTICS

# Business Model

C&A B.V. ("the Company"), together with its subsidiaries ("C&A" or "C&A group") connects millions of European customers daily through its online shop and around 1,300 stores across 17 European countries. C&A combines a rich heritage of 184 years of fashion retail experience with a forward-looking commitment to sustainability and innovation. The goal is to offer stylish, high-quality clothes affordable for everyone. Every day, C&A strives to inspire customers to look, feel, and do good.

There have been no changes in the significant groups of products compared to the previous reporting period. C&A does not trade in products or services that are banned in certain markets.

C&A operates solely in the Wholesale and Retail Trade (WWR) sector.

We strive to align our products and processes with our environmental, social, and governance priorities as we focus on what we make, how we make it, and on consumer needs and use patterns. These core areas of impact are detailed further on page [44](#).

Our sustainability strategy is rooted in our values and reflected in the commitments we uphold towards our stakeholders:

- “We care for people and planet” is one of our five core values. This principle guides our commitment to reducing harm, improving our practices, and helping customers make more informed choices.
- Our shareholder mission further illustrates this ambition: “Being a force for good, both in what we do and how we do it.”

Our sustainability strategy encompasses the full life cycle of our products – from design and sourcing through to consumer use and end of life. The strategy is applied across all product categories, with particular emphasis on high-volume segments.

In addition, we place strong emphasis on the social dimensions of our products, focusing on the well-being of workers within our supply chain – particularly in selected countries in Asia where labor-intensive processes, limited legal protections, and weak enforcement mechanisms present heightened social risks – and the needs and expectations of our European customer base.

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	<i>Climate Change</i>	x	x	x	x	x	x
E2	<i>Pollution</i>	x	x	x	x	x	x	
E3	<i>Water and Marine Resources</i>	x	x	x	x			
E4	<i>Biodiversity and Ecosystems</i>	x	x	x	x	x	x	x
E5	<i>Circular Economy</i>	x	x	x	x	x	x	x
S1	<i>Own Workforce</i>					x		
S2	<i>Workers in the Value Chain</i>	x	x	x	x			x
S3	<i>Affected Communities</i>	x	x	x	x	x		
S4	<i>End-users</i>					x	x	x
G1	<i>Business Conduct</i>	x	x	x	x	x		x

# Aligning our Strategy with Sustainability Priorities

In 2020, C&A set a series of time-bound targets we aim to achieve by 2028 (see details on [page 7](#) under Progress Update). These targets address key material topics, such as increasing our share of more sustainable fibers, reducing greenhouse gas emissions, and improving chemical management. The double materiality assessment (DMA) performed in 2023 confirmed the relevance of our existing focus areas, which we further updated and validated in 2024 (see additional details on material impacts starting on [page 17](#)).

We continued to act on our targets, keeping them central to our roadmap. C&A made substantial internal investments, notably in strengthening the Sustainability Supply Chain team in Asia. The transition included the appointment of a new Head of Sustainability, reinforcing our leadership capacity. As a result, our strategy emphasized continuity over expansion; this was a deliberate choice to stabilize before building up again.

Guided by our materiality assessment, C&A's sustainability strategy remains focused on the following areas of impact:

## 1. What We Make

In 2024, we continued to advance our demand-driven approach, further moving away from a traditional push-based model. By maintaining a streamlined collection, we prioritize producing only what our customers truly need and want – helping reduce overproduction and minimize waste throughout the value chain.

We also strengthened our commitment to using lower-impact materials by enhancing supplier guidance and prioritizing these materials in our most resource-intensive product categories like basics, kidswear, denim, and outerwear. These categories offer the greatest potential for positive impact through improvements in materials and production practices.

## 2. How We Make It

Circularity principles continued to inform many of our product development initiatives. Building on ongoing efforts to review and optimize our fabric portfolio, we have intensified our focus on supply chain traceability, with particular attention to the deeper tiers of the supply chain. This enhanced focus enables us to better identify and address social and environmental risks associated with manufacturing.

## 3. How Our Consumers Use Their Clothes

We continued to promote more conscious consumption in 2024 through our collaboration with Carou – the secondhand concept (a part of the TEXAID Group) and initiatives such as our “We Take It Back” program. Both remained active throughout the year and underwent operational improvements to integrate key learnings and enhance their overall impact.

The three complementary approaches within this strategy enable us to holistically consider the systemic nature of the environmental, social, and governance challenges. We are committed to mitigating our impacts and risks while integrating sustainability into our business practices. Through our efforts, we aim not only to improve our own supply chain but also to contribute to broader improvements in industry standards.

Therefore, taking active responsibility to identify, address, and reduce actual and potential adverse impacts is central to both our sustainability strategy and our broader approach to due diligence. This work touches many parts of our value chain and continues to

evolve. While specific actions vary by risk and context, the following examples illustrate some of the steps we are currently taking.

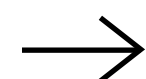
After achieving our initial SBTi target, we are currently preparing our updated target for a formal submission in 2025, demonstrating our commitment to long-term climate responsibility and transparent progress tracking.

This commitment to transparency and accountability also extends to our human rights approach. 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 and 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. We update this list every six months to ensure that the information provided is up to date and actionable for our stakeholders. Civil society relies on it to alert us to issues affecting workers in our supply chain that might otherwise remain less visible, enabling us to investigate, collaborate with suppliers, and implement remediation measures where needed. This form of engagement has become a part of our due diligence process, strengthening our ability to respond to labor rights challenges in real time, next to other mechanisms. This reinforces our belief that transparency is a practical foundation for meaningful stakeholder collaboration.

To access the C&A Suppliers' Factory List, please [click here](#).

# Governance

C&A B.V., the parent company of the European C&A group of companies, has a two-tier board structure comprising both a Management Board and a Supervisory Board. The Management and Supervisory Boards play pivotal roles related to business conduct matters.



The Management Board oversees the day-to-day management of the company, including planning for the future and determining company strategy and policies. This board is led by executives with deep expertise in retail operations and strategic management:

- **Edward Brenninkmeijer (CEO)** has served as CEO of C&A Brazil, Mexico, and P.R. China. His experience spans multiple regions and includes significant leadership in retail operations.
- **Birgit Kretschmer (CFO)** has been with C&A since January 2021. She has a strong background in finance and retail, having held various leadership positions at Adidas. Her expertise includes corporate finance, supply chain finance, and e-commerce.

The Supervisory Board has a legal duty to monitor the actions and policies of the management board. It also provides strategic advice and draws attention to issues affecting the company's progress or viability. Members' expertise on business conduct matters stems from their comprehensive understanding of C&A's corporate policies and legal responsibilities, as well as specific business acumen related to the company's performance and sustainability in the marketplace.

As of 28 February 2025, the Supervisory Board of C&A B.V. was composed of the following members:

- **Marcos Grasso** brings over 25 years of international experience in business transformation across various industries, including consumer goods and fashion retail. He has held executive roles at Warner-Lambert,

Pfizer, Cadbury, and Kraft Foods/Mondelez. He currently serves as Chair of the Board of C&A Brazil and Head of Eurazeo in South America.

- **Allan Leighton** is a seasoned leader with extensive experience in retail and business transformation. His strategic leadership plays a pivotal role in guiding C&A's long-term direction.
- **Maëlys Castella** offers strong financial expertise, with a background in auditing and compliance, contributing to the board's financial oversight and risk management.
- **Diane de Saint Victor** brings a legal and corporate governance background, enhancing the board's ability to oversee regulatory and ethical standards.
- **Nigyar Makhmudova** has deep experience in the consumer goods and retail sectors, providing valuable strategic insights to the board.
- **Alexander Birken** brings a wealth of experience in retail and e-commerce. He is the CEO and Chairman of the Supervisory Board at Otto Group and has previously held executive roles at Spiegel Group. His expertise strengthens the board's oversight of digital transformation and international retail strategy.

Together, both boards play a central role in shaping and implementing the corporate culture and business conduct policies of the company. Employees and other workers are not represented on the boards.

# Changes After the Reporting Period

Following the end of the reporting period and prior to the publication of this sustainability statement, the following changes occurred in the composition of the Supervisory Board:



- Maëlys Castella, Nigyar Makhmudova, and Alexander Birken stepped down from their roles. Bart Brenninkmeijer was appointed to the Supervisory Board. Bart brings deep knowledge of C&A's heritage and values, along with experience in family business governance and long-term strategic stewardship.
- Laurent Brenninkmeijer joined the Supervisory Board, bringing a strong background in international business

and investment management, with a focus on sustainable development and long-term value creation.

- Ditri Zandstra joined the Supervisory Board with a background in corporate governance, finance, and strategic advisory. Her experience spans both executive and non-executive roles across various sectors, contributing to the board's oversight and risk management capabilities.



# Governance structure and oversight of sustainability matters

C&A's sustainability governance is anchored at multiple levels. Oversight of sustainability-related impacts, risks, and opportunities is carried out by the Management Board and two dedicated bodies: the Sustainability Committee and the Human Rights Governance Council.

## Responsible Bodies and Individuals

The Management Board holds executive accountability for the integration of sustainability into the business. Operational responsibility lies with the Head of Sustainability, who reported to the Chief Operations Officer until September 2024; currently, the role reports directly to the CEO.

The Human Rights Governance Council and the Sustainability Committee support strategy, internal alignment, monitoring, and risk assessment. Fairness Channel (see page 62, in S1 Own Workforce) progress is reported to the Supervisory Board quarterly, ensuring continued oversight of complaints and

potential human rights or compliance-related risks. Additionally, the Supervisory Board's Audit Committee receives annual briefings on sustainable supply chain performance. These updates focus on supplier non-compliances and audit findings.

## Terms of Reference and Mandates

The Sustainability Committee is mandated to review the strategic direction of the sustainability agenda, monitor material sustainability issues, and assess progress against approved targets. The Human Rights Governance Council oversees human rights due diligence and monitors compliance-related risks in sourcing regions. Both committees contribute to cross-functional coordination and risk visibility at the executive and governance levels.

Amid transitions, the Sustainability Committee did not convene during FY2024. In the absence of committee meetings, responsibilities were managed directly by the

Chief Operations Officer and subsequently by the CEO. The committee is scheduled to resume its function in FY2025. In contrast, the Human Rights Governance Council remained fully operational throughout FY2024, continuing its oversight and reporting activities, and escalating concerns and risks as appropriate.

## Management's Role and Governance Procedures

The Head of Sustainability leads the Sustainability Leadership Team, which is responsible for day-to-day management of sustainability-related topics. This includes coordination across key functions such as product, sourcing, logistics, indirect procurement, selling, marketing, legal, and human resources, to ensure that material topics and opportunities are addressed. In 2024, where needed, interim reporting lines and adapted working processes were maintained to ensure oversight and continuity.

The work of the Sustainability Leadership Team is supported by subject matter experts, alongside sustainable supply chain specialists based in key sourcing countries. The Sustainability Team's expertise is aligned with core material areas including climate impact, circularity, and social compliance.

## Oversight of Targets and Progress

The Management Board reviews and approves the sustainability strategy and annual action plans based on input from the Head of Sustainability and relevant senior executives. The Supervisory Board is periodically briefed on long-term commitments and alignment with regulatory developments.

## Expertise and Capacity of Governance Bodies

The Management Board has access to internal sustainability experts and receives periodic briefings. In 2024, these included internal sessions on CSRD requirements and upcoming EU due diligence legislation. Additional awareness-raising and capability-building activities are planned for 2025.

## Consideration of Risks and Trade-Offs

Both the Management Board and the Supervisory Board consider sustainability-related risks and impacts as part of broader strategic and operational decisions.

## Topics Addressed by Governance Bodies

In the 2024 reporting year, material topics addressed by governance bodies included:

- Non-compliances and supply chain risks.
- Climate impact.
- Regulatory readiness.
- Fairness Channel outcomes.
- Responsible material sourcing progress.

# Stakeholder Engagement

Input from stakeholders remains central to how we define our direction and shape our priorities. Our 2023 double materiality assessment (DMA), which guided our work throughout 2024, was informed by a wide spectrum of external and internal perspectives. This included NGOs operating in sourcing regions on social and environmental issues, global and regional trade unions, and organizations supporting underrepresented communities. These voices continue to shape how we understand our broader responsibilities.

In 2024, our key stakeholder channels remained active. We received both confidential and public input, including concerns and action requests, which we assessed and implemented in collaboration with our suppliers, and in line with our policies. We also held direct discussions with workers' representatives. These conversations were among the most impactful during the year, and we continue exploring ways to reflect their input in future planning.

Our main stakeholder groups include:

- Employees in stores and offices.
- Workers and suppliers in sourcing countries.
- Customers in core markets.
- Industry peers and civil society organizations.
- Shareholders and governance bodies.

Stakeholder engagement helps us identify risks, shape solutions, and strengthen accountability. Feedback from suppliers supports our audit and capacity-building approach. NGO perspectives have informed our responsible purchasing practices, while customer expectations have guided our direction on transparency and product durability. We approach trade-offs raised by stakeholders with openness and a willingness to learn.

Key themes raised in 2024 included:

- Stronger transparency around product origin and production conditions.
- Clearer progress on supplier remediation.
- Advancement in freedom of association, freedom from violence and harassment, and wage development.

We regularly share insights from stakeholder engagement with leadership. This includes updates to the CEO as well as quarterly reporting of Fairness Channel outcomes to the Supervisory Board. Read more about the Fairness Channel on [page 62](#). Serious concerns are escalated to and followed up by C&A's senior leaders and governance bodies, helping ensure stakeholder expectations are actively considered in our strategic decisions.

# Material Impacts, Risks, and Opportunities

The double materiality assessment (DMA) process is used to identify and prioritize material topics. Each material topic is then analyzed to determine the relevant impacts, risks, and opportunities (IROs).

We recognize that as an affordable fashion retailer, our operations – from sourcing raw materials and manufacturing to retail and consumer use – shape the environmental and social footprint of our value chain. Our strategy focuses on using lower impact materials, defined as those that reduce environmental impacts and promote circularity; practicing ethical sourcing, which entails responsible labor conditions, fair treatment, and supplier compliance; and committing to responsible marketing that promotes transparency and inclusivity. We ensure sustainability is increasingly embedded across all our activities and decisions through clear policies, supplier standards, ongoing training, and regular monitoring.

To stay ahead of emerging risks and impacts, we conduct annual risk analyses from both business continuity and human rights perspectives, with our DMA serving as a key tool to expand and integrate these insights.

Our approach continues to hold up under pressure and adapt to changing realities; we safeguard resilience and capacity through dedicated resources, cross-functional collaboration, and ongoing investment in innovation and responsible sourcing.

In 2024, we demonstrated operational robustness in our sourcing hubs throughout the period of internal transition at C&A, which reflects the strength of our established systems, and the adaptability of our sustainable supply chain teams.

This workforce and systems reliability is further supported by our stable ownership structure, which encourages decisions that prioritize long-term outcomes over quick returns. Offering affordable fashion is a core strength that helps us stay relevant and accessible, advance sustainability by both increasing awareness and expanding the use of responsible practices, while meeting the needs of all families for every occasion.

In 2024, we conducted a double materiality assessment (DMA) update to sharpen our focus. The process included a threshold review, an evaluation of additional internal and external findings on impacts, risks, and opportunities (IROs), a qualitative assessment of identified material topics, and leadership sign-off. The 2024 DMA update resulted in changes from 2023 in S1, S2, S4 and G1 (detailed within each of those sections) and resulted in 32 topics to be reported against. There are no additional industry or company specific material topics besides the material topics that are covered under the European Sustainability Reporting Standards (ESRS).

Throughout the year, some of the identified risks materialized and were remedied. These are shared in later sections of this report (see [page 62](#) Fairness Channel), while others were successfully mitigated. These factors shaped the ongoing implementation of our sustainability strategy, driving a more targeted approach to risk management and priority-setting. Looking ahead, we plan to further embed the insights from the DMA into innovation and operational resilience to ensure long-term value creation.

ESRS		ENVIRONMENT
E1	<i>Climate Change</i>	Climate Change Adaptation
		Climate Change Mitigation
		Energy
E2	<i>Pollution</i>	Pollution of Air
		Pollution of Water
		Pollution of Soil
		Pollution of Living Organisms and Food Resources
		Substances of Concern and Microplastics
E3	<i>Water and Marine Resources</i>	Water Consumption
		Water Withdrawals
		Water Discharges
E4	<i>Biodiversity &amp; Ecosystems</i>	Biodiversity
E5	<i>Resource use &amp; Circular Economy</i>	Use of Resources
		Waste Management

ESRS		SOCIAL
S1	<i>Own Workforce</i>	Health & Safety
		Gender Equality & Equal Pay
		Diversity and Equal Treatment
		Harassment at Workplace
S2	<i>Workers in Value Chain</i>	Working Time
		Adequate Wages
		Freedom of Association
		Collective Bargaining
		Health & Safety
		Gender Equality
		Violence & Harassment
S4	<i>Consumer and End Users</i>	Child Labor
		Forced Labor
		Data Protection
G1	<i>Business Conduct</i>	Health & Safety

ESRS		GOVERNANCE
G1	<i>Business Conduct</i>	Corporate Culture
		Anti-bribery & Corruption



# IRO Summary

ESRS TOPIC	SUB-TOPIC	IRO DESCRIPTION	IRO TYPE	TIME HORIZON	VALUE CHAIN
E1 Climate	Climate Change Mitigation	GHG emissions related to raw material production, extraction and conversion into apparel	Negative impact	Long	Upstream
E1 Climate	Energy	Limited usage of renewable energy	Negative impact	Medium, long	Own operations
E1 Climate	Climate change mitigation	Climate related physical risks	Financial risk	Medium, long	Upstream, own operations
E1 Climate	Climate change transition	Climate related transitional risk	Financial risk	Medium, long	Own operations
E2 Pollution	Pollution of air, water, soil and living organisms	Chemical usage in raw material production	Negative impact	Long	Upstream
E2 Pollution	Pollution of air, water, soil and living organisms	Chemical usage in yarn & fabric dyeing and finishing	Negative impact	Long	Upstream
E2 Pollution	Pollution of air, water, soil and living organisms	Pollution related compliance and reputational risks	Financial risk	Long	Upstream
E2 Pollution	Microplastics	Microplastic shedding in manufacturing & consumer use	Negative impact	Long	Downstream
E3 Water	Water consumption, withdrawal	Water usage in raw material production	Negative impact	Long	Upstream
E3 Water	Water consumption, withdrawal, discharge	Water usage in yarn & fabric dyeing and finishing	Negative impact	Long	Upstream
E3 Water	Water consumption, withdrawal, discharge	Water related operational risks	Financial risk	Long	Upstream
E4 Biodiversity	Biodiversity	Biodiversity loss due to monoculture and chemical usage (fertilizer, pesticides, insecticides) in raw material production	Negative impact	Long	Upstream
E4 Biodiversity	Biodiversity	Biodiversity loss due to deforestation	Negative impact	Long	Upstream
E4 Biodiversity	Biodiversity	Biodiversity related operational and compliance risks	Financial risk	Long	Upstream
E5 Circular Economy	Resource use	Raw material usage	Negative impact	Long	Upstream

The 2023 DMA built the foundation for the 2024 update. A full description of the methodology used to identify and evaluate C&A's impacts, risks, and opportunities (IROs) is available in our [2023 Sustainability Report](#).

The following summary aims to provide a high-level overview while the IROs are further detailed in each topic-specific section of the report.



# IRO Summary

ESRS TOPIC	SUB-TOPIC	IRO DESCRIPTION	IRO TYPE	TIME HORIZON	VALUE CHAIN
E5 Circular Economy	Resource use	Raw material related operational & compliance risks	Financial risk	Long	Upstream
E5 Circular Economy	Circularity	Products designed for circularity	Positive impact	Long	Own operations
E5 Circular Economy	Circularity	Limited ability to re-use and recycle products	Negative impact	Long	Own operations, downstream
E5 Circular Economy	Circularity	Circularity related operational & compliance risks	Financial risk	Long	Own operations, downstream
E5 Circular Economy	Waste	Waste impact related to production and distribution of apparel	Negative impact	Long	Own operations, upstream
E5 Circular Economy	Waste	Waste related reputational and compliance risks	Financial risk	Long	Own operations, upstream
S1 Own Workforce	Health and safety	Physical health and safety incidents	Negative impact	Long	Own operations, logistics
S1 Own Workforce	Gender equality and equal pay	Unequal treatment in employment	Negative impact	Long	Own operations, logistics
S1 Own Workforce	Harassment	Harassment at workplace	Negative impact	Long	Own operations, logistics
S1 Own Workforce	Diversity and equal treatment	Creating an inclusive work environment	Negative impact	Long	Own operations, logistics
S2 Workers in Value Chain	Diversity and equal treatment	Own workforce related operational risks	Financial risk	Long	Own operations, logistics
S2 Workers in Value Chain	Health and safety	Occupational Health & safety incidents	Negative impact	Long	Upstream, logistics
S2 Workers in Value Chain	Freedom of association, collective bargaining	Violations of rights of freedom of association and collective bargaining	Negative impact	Long	Upstream, logistics
S2 Workers in Value Chain	Working time	Excessive working hours	Negative impact	Long	Upstream, logistics
S2 Workers in Value Chain	Adequate wages	Inadequate wages	Negative impact	Long	Upstream, logistics
S2 Workers in Value Chain	Equality and equal pay	Ensuring equal treatment and opportunities	Negative impact	Long	Upstream



# IRO Summary

ESRS TOPIC	SUB-TOPIC	IRO DESCRIPTION	IRO TYPE	TIME HORIZON	VALUE CHAIN
S2 Workers in Value Chain	Measures against violence and harassment	Harassment at workplace	Negative impact	Long	Upstream
S2 Workers in Value Chain	Child labor	Child labor	Negative impact	Long	Upstream
S2 Workers in Value Chain	Forced labor	Forced labor	Negative impact	Long	Upstream, logistics
S2 Workers in Value Chain	Forced labor	Human rights related operational & compliance risks	Financial risk	Long	Upstream
S4 Consumers and End-users	Data privacy	Data privacy incidents	Negative impact	Long	Own operations
S4 Consumers and End-users	Data privacy	Data privacy related operational, compliance, and reputational risk	Financial risk	Long	Own operations
S4 Consumers and End-users	Consumer Health and safety	Consumer health & safety related to products	Negative impact	Long	Own operations
S4 Consumers and End-users	Consumer Health and safety	Consumer health and safety related operational, compliance, and reputational risks	Financial risk	Long	Own operations
Business Conduct	Corporate culture	Fair and ethical business environment	Positive impact	Long	Own operations
Business Conduct	Anti-bribery and corruption	Honest and unprejudiced business environment	Positive impact	Long	Own operations, upstream

## Climate Change

C&A emitted 2,501,028 tons of CO<sub>2</sub> equivalent in 2024. Meeting our decarbonization and energy use reduction targets is essential for reducing our environmental impacts and limiting climate-related risks. These risks may most significantly affect communities in sourcing countries, as well as influence supply chain stability and long-term business continuity.

## Pollution & Water and Marine Resources

C&A aims to select raw materials that have a lower pollution impact compared to conventional options. We combine this approach with a strong chemical management program in our manufacturing phases. This is essential, as textile production remains water- and chemical-intensive, often concentrated in water-stressed regions. Without careful sourcing and process control, these activities risk contaminating ecosystems, straining local water supplies, and undermining community resilience. By advancing safer materials and stewardship practices, we aim to reduce pollution and safeguard water resources where they are most vulnerable.

In addition, we are increasingly aware of the potential for microfibers and microplastics to harm ecosystems, wildlife, and human health – affecting marine and freshwater systems, as well as air and soil. To address

this challenge, we actively participate in industry collaborations – such as our membership in The Microfibre Consortium (TMC) – and we conduct ongoing testing and analysis of our textile products to better understand and reduce microfiber shedding. We will also integrate these insights into our product research and development, with the aim of designing garments that minimize microfiber release throughout their lifecycle.

## Biodiversity and Ecosystems

Biodiversity is a cross-cutting topic that concerns protecting and regenerating ecosystems and supporting healthy interactions among organisms in order to allow environments and nearby communities that depend on them 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 consideration of biodiversity links with our goals and actions in multiple areas of this report, including pollution, climate change, circularity, and materials.

## Resource Use and Circular Economy

Operating at scale and serving millions of customers annually, the production of our products and packaging requires a significant amount of materials.

Additionally, design choices greatly affect product end of life outcomes. We aim to optimize material efficiency, consumer usability, and post-use recovery while ensuring our products remain accessible to all customers. We recognize that improvements in one area can sometimes create challenges in another; a typical trade-off involves increasing recyclability at the expense of durability or affordability. Our approach focuses on developing solutions that minimize environmental impact, maintain product performance, and deliver holistic customer value. While our raw material sourcing and circularity efforts help mitigate these impacts, we acknowledge that fully addressing these challenges is an ongoing process requiring continuous innovation and industry collaboration.

## Own Workforce

By proactively addressing health and safety issues and systemic challenges to inclusion, we aim to reduce strain on employee well-being, enhance workforce satisfaction, and attracting and retaining skilled workers of all backgrounds and identities. This work can differentiate our company as a safe and truly inclusive workplace and an employer of choice that is dedicated to equity.

## Workers in the Value Chain

We are aware of systemic human rights issues in the apparel sector that can lead to adverse impacts for

workers in our upstream value chain. Our policies, processes, collaboration with stakeholders, and local presence by sustainability staff in production countries aim to prevent and, where necessary, remediate such negative impacts.

## Consumers and End-Users

Our customers' health, safety, and enjoyment of our products are fundamental. We work hard to ensure product quality and safety, aiming to meet or exceed industry standards, legal requirements, and our customers' expectations.

Consumer protection and data privacy are also priorities at C&A. As our business and digital activities evolve, we remain vigilant to the potential risks to personal and payment data. Our robust policies and dedicated measures are in place to help prevent data breaches and protect customer privacy.

## Business Conduct

Corporate culture is crucial for ensuring a fair and ethical business environment, aiming to protect our people, uphold our reputation, and secure the long-term success of our business. As a core element of responsible business conduct, anti-bribery and anti-corruption measures are essential for maintaining honesty and impartiality, and accountability across C&A operations.

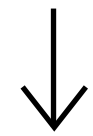
# Environmental Information

In this section we describe our strategy and actions on topics ranging from climate, pollution, and safer chemistry to materials, microfibers, resource use, and circular economy.



# E1 Climate Change

Greenhouse gas (GHG) emissions arise throughout our value chain, spanning both company operations and those of our suppliers. These emissions contribute to climate change and may result in adverse impacts for ecosystems, communities, and the business itself.



Textile production requires substantial energy use in the raw material and manufacturing phases, which often relies on fossil fuels. Energy is also needed to power machinery, heat buildings, and provide lighting. Finally, components and products must be transported around the world. Each of these steps has the potential to emit GHGs and influence climate outcomes.

Climate change presents a strategic business risk. Shifting weather patterns and increasingly frequent extreme events, such as floods, wildfires, and heatwaves, can compromise supply chain continuity and resilience – with potential disruptions of operations, logistics, and financial performance. We carefully consider many types of risks as we continually update our climate impact mitigation actions.



# Impact, Risks, and Opportunities (IROs)

Our business operations release emissions into the atmosphere throughout all stages of the value chain. To understand what drives the most impact, we calculate our greenhouse gas (GHG) emissions footprint on a yearly basis following the Greenhouse Gas Protocol. This approach enables us to closely monitor the emissions impact of our key activities and initiate actions to combat climate change based on what we learn.

C&A emitted 2.512,105 tons of CO<sub>2</sub> equivalent in 2024. Achieving our decarbonization targets is essential for reducing our environmental impacts and limiting climate-related risks. To effectively reduce our environmental impact and manage climate-related financial risks, we have identified four key IROs in

relation to our climate change goals (see table to the right).

Notably, our physical risks are concentrated mainly in our production facilities, many of which are located in vulnerable areas. These facilities might be impacted by increased frequency and severity of extreme weather events (e.g. wildfires, cyclones, hurricanes, or floods) resulting in facility damage, resource scarcity, increased raw material costs, or supply chain disruptions. These scenarios could cause negative financial impacts.

Our transition risks come from potential future shifts toward clean energy sources within our key production countries and operations, which may require significant financial outlay. Transitioning to more eco-friendly

E1 CLIMATE				
IRO DESCRIPTION	IRO TYPE	TIME HORIZON	VALUE CHAIN	MATERIAL TOPIC
GHG emissions related to raw material production, extraction, and conversion into apparel	Negative impact	Long	Upstream	Climate change mitigation
Limited usage of renewable energy	Negative impact	Medium, long	Own operations	Energy
Climate related physical risks	Financial risk	Medium, long	Upstream, own operations	Climate change mitigation
Climate related transitional risk	Financial risk	Medium, long	Own operations	Climate change mitigation

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. These shifts may also introduce people-related risks, such as the need for workforce reskilling, evolving job roles, and uncertainty within supplier communities: all of which could affect social sustainability outcomes.

To address our climate impacts and risks, 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. Our strategic efforts to address GHG emissions in apparel manufacturing, and our work to transition to renewable energy sources, are explained throughout this chapter.

# Strategy

To better identify climate-related impacts, risks, and opportunities, we have started developing our first climate risk and resilience assessment. This structured process will enable us to identify, analyze, and address the potential impacts of climate change on C&A. In this way, we will be able to better plan how to adapt and respond to those impacts, which will strengthen our overall resilience.

# Targets

SCIENCE BASED TARGET EMISSIONS <sup>1</sup>	2018 BASELINE	2024	TARGET YEAR 2030	REQUIRED REDUCTION	ACHIEVED REDUCTION
<b>Scope 1 GHG Emissions (tCO<sub>2</sub>e)</b>	18,724	11,502	13,107	29,843	70,552
<b>Scope 2 GHG Emissions (tCO<sub>2</sub>e)</b>	80,753	17,423	56,527		
<b>Scope 3 GHG Emissions (tCO<sub>2</sub>e)</b>	3,398,345	1,811,230	2,378,842	1,019,504	1,587,115
<b>Total GHG Emissions (tCO<sub>2</sub>e)</b>	3,497,822	1,840,155	2,448,475	1,049,347	1,657,667

<sup>1</sup> 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)

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.

We determine our GHG emissions inventory for scopes 1, 2, and 3 in accordance with the GHG Protocol using an operational control approach. In 2024 we recorded a further decrease in our emissions, achieving a 47.4% reduction in our overall total GHG emissions and a 50.2% reduction in GHG emissions within the SBT boundary compared to our 2018 baseline.

In 2024, we renewed our commitment to the Science Based Targets initiative (SBTi), declaring our intention to revise our near-term target and set a 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. In 2025, we will define those targets and submit them for official validation to the SBTi.

# Progress Update

The following table shows the emissions across our value chain from 2018-2024.

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 between will be re-calculated.

See tables in the in the Annex for additional details on methodologies and tools used, as well as emission categories.

## Methodology changes in 2024 Inventory

In the 2024 inventory, two key methodological enhancements have been introduced:

- Inclusion of FLAG emissions
- Incorporation of primary supplier energy consumption data

These changes are primarily driven by the need to align with the latest SBTi target-setting requirements and leverage improved data availability. They aim to enhance the accuracy and accountability of our reporting, while also meeting external data disclosure obligations.

(1) The 2023 inventory results were recalculated due to improved data accuracy (notably in upstream transportation), the incorporation of updated supplier data, and the application of enhanced SBTi FLAG Compliant Cotton Models

(2) Therefore, a progress calculation is not possible.

(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.

			2018 Baseline	2019	2020	2021	2022	2023 <sup>1</sup>	2024	2024 vs. 2023	2024 vs. Baseline	
SCOPE	CATEGORY	SUB-CATEGORY	tCO <sub>2</sub> e									
SCOPE 1	Direct emissions from sources owned and controlled by the company		18,724	19,113	13,646	16,959	13,960	12,893	11,502	-10.8%	-38.6%	
	Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)		-	-	-	-	-	-	-	-	-	
SCOPE 2	Purchased or acquired electricity, steam, heat and cooling		80,753	78,322	54,410	113,840	48,149	37,650	17,423	-53.7%	-78.4%	
<b>Total Scope 1 &amp; 2 emissions</b>			<b>99,477</b>	<b>97,435</b>	<b>68,056</b>	<b>130,799</b>	<b>62,109</b>	<b>50,544</b>	<b>28,925</b>	<b>-42.8%</b>	<b>-70.9%</b>	
SCOPE 3	Purchased goods and services	Raw Material Production	766,840	691,760	499,573	517,376	481,252	469,913	371,019	-21.0%	-51.6%	
		Yarn Production	927,126	877,970	580,795	619,202	779,511	670,101	628,637	-6.2%	-32.2%	
		Fabric Production	946,334	891,439	602,620	457,304	606,679	700,704	590,836	-15.7%	-37.6%	
		Integrated Production	472,975	524,260	258,790	428,625	52,330	- <sup>2</sup>	26,237	- <sup>2</sup>	-94.5%	
		Garment Assembly	262,051	300,720	362,767	284,517	230,858	201,77	171,549	-15.0%	-34.5%	
		Non-garment	23,019	26,829	20,167	63,695	18,795	31,122	22,953	-26.3%	-0.3%	
		Water	4,434	4,091	2,645	2,367	68	64	72	12.5%	-98.4%	
		Other Retail Spend	424,612	355,460	342,177	310,542	303,922	241.112	201,408	-16.5%	-52.6%	
		Fuel and energy related activities		23,676	21,014	18,628	35,157	30,144	21,915	14,571	-33.5%	-38.5%
		Upstream transportation and distribution	Air Transportation	53,077	32,509	94,719	38,508	7,133	12,874	24,297	88.7%	-54.2%
			Rail Transportation	-	875	3,741	5,199	65	394	791	100.8%	- <sup>3</sup>
			Sea Transportation	78,751	71,738	63,419	102,239	131,206	13,215	12,618	-4.5%	-84.0%
			Truck Transportation	298,847	256,804	225,510	238,039	277,985	104,519	92,930	-11.1%	-68.9%
		Waste generated in operations		4,352	4,240	2,684	2,820	3,013	4,449	3,179	-28.5%	-26.9%
Business travel		817	646	268	310	459	571	269	-52.9%	-67.1%		
Employee commuting		48,352	44,828	35,975	41,658	40,473	33,879	37,234	9.9%	-23.0%		
Downstream transportation and distribution		-	-	-	-	-	840	492	-41.4%	- <sup>4</sup>		
Use of sold products		580,737	541,080	460,020	349,324	319,596	288,234	269,180	-6.6%	-53.6%		
End of life treatment of sold products		28,713	27,722	25,720	20,414	19,918	15,937	14,909	-6.4%	-48.1%		
<b>Total Scope 3 emissions</b>			<b>4,944,713</b>	<b>4,673,985</b>	<b>3,600,217</b>	<b>3,517,295</b>	<b>3,303,406</b>	<b>2,811.619</b>	<b>2,483,180</b>	<b>-11.7%</b>	<b>-49.8%</b>	
<b>Total GHG emissions</b>			<b>5,044,190</b>	<b>4,771,419</b>	<b>3,668,273</b>	<b>3,648,094</b>	<b>3,365,515</b>	<b>2,862,163</b>	<b>2,512,105</b>	<b>-12.2%</b>	<b>-50.2%</b>	

## Inclusion of FLAG Emissions

As part of our ongoing commitment to strengthening the quality and transparency of our climate reporting, we have included FLAG emissions (Forest, Land, and Agriculture) in our greenhouse gas (GHG) inventory for the first time in 2024. In addition, we have retroactively incorporated FLAG emissions into our 2023 inventory.

### What are FLAG Emissions?

FLAG emissions refer to greenhouse gas emissions resulting from forestry, land use, and agriculture-related activities. These emissions are particularly relevant for companies with supply chains linked to food, fiber, or land-intensive products and are typically accounted for under scope 3.

### Why This Matters:

Although we are not required to set a specific FLAG emission reduction target, by integrating FLAG emissions into our inventory, we are gaining a more comprehensive understanding of our full climate impact, especially related to land-use change and agricultural sourcing. This enables us to make better informed decisions on climate action planning, responsible sourcing, and product strategy alignment.

## Incorporation of Primary Supplier Energy Consumption Data

To accommodate the extended deadline for our production units to finalize the latest version of FEM (Facility Environmental Module, see details on [page 34](#)), we initiated direct collection of primary energy and water data from our strategic suppliers and production units through the launch of the Manufacturing Climate Program in 2024. This data was virtually validated by the C&A internal team and reviewed by our carbon consultant to ensure preliminary quality assurance. It was subsequently integrated into the 2024 inventory, enhancing the visibility and accuracy of C&A's carbon accounting while reducing dependence on secondary industrial databases. For further details, refer to the section titled "Indirect Emissions from Product Manufacturing." As this data did not exist for the 2023 inventory year, no recalculation was possible for the 2023 inventory.

## Direct Emissions from Own Operations

To reduce emissions in scopes 1 and 2, we remain focused on enhancing energy efficiency across our operations and increasing the share of renewable electricity.

### Spotlight on LED Retrofit Initiatives

Demonstrating our continued commitment to energy efficiency, we launched a comprehensive and coordinated LED retrofit program at the end of 2024.

Through this initiative, we are installing energy-efficient LED lighting in all stores that have not yet been equipped, aligning closely with planned refurbishment efforts. In 2024, 37 stores were upgraded as part of this program, resulting in total energy savings of 2,369 MWh - representing a reduction of approximately 75% compared to the previous lighting systems.

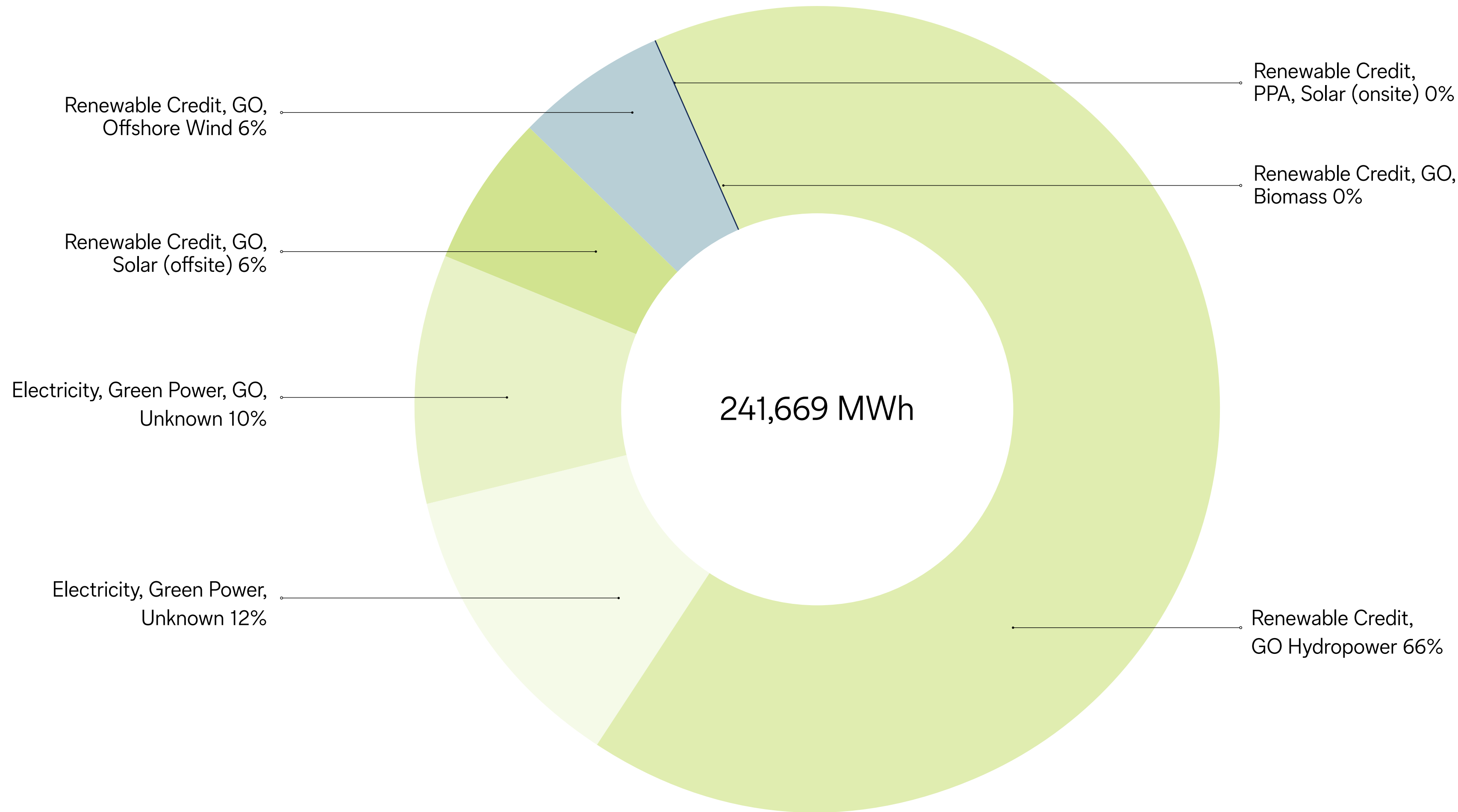
### Sourcing Renewable Energy

As part of our broader commitment to sustainability, we're not only advancing energy efficiency through measures like LED retrofits, we are also taking steps to transition to renewable electricity across our own operations.

By 2028, we aim to source 100% of the electricity used in our own operations from renewable sources, focusing especially on facilities where we control electricity procurement.

In 2024, 88% of the electricity used in our own operations came from renewable sources, reflecting steady progress. This achievement is supported by using 100% Renewable Energy Guarantees of Origin (REGO) certificates, providing assurance that our energy purchases are matched by verified renewable energy.

## Breakdown of Renewable Electricity Source (Own Operations) in 2024



1) PPA - Power Purchase Agreement  
 2) GO - Guarantees of Origin (renewable energy attribute certificate)

RENEWABLE SOURCE	MWh	%
Renewable Credit, GO <sup>2</sup> , Hydropower	158,250	66%
Electricity, Green Power, Unknown	29,554	12%
Electricity, Green Power, GO, Unknown	24,177	10%
Renewable Credit, GO, Solar (offsite)	15,050	6%
Renewable Credit, GO, Offshore Wind	13,836	6%
Renewable Credit, GO, Biomass	622	0%
Renewable Credit, PPA <sup>1</sup> , Solar (onsite)	180	0%

## Breakdown of Contractual Instruments Used for Renewable Energy Attribute Claims in 2024 (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	82,617	53,063	29,554	64%	36%
Purchase from an on-site installation owned by a third party (on-site PPA <sup>1</sup> )	Contract	180	180		100%	
Default delivered electricity from the grid (e.g. standard product offering by an energy supplier), supported by energy attribute certificates	GO <sup>2</sup>	158,872	158,872		100%	
Total		241,669	212,115	29,554	88%	12%

## Scope 2: Market-Based GHG Emission Credits by Contractual Instruments

CONTRACTUAL INSTRUMENT	TOTAL CREDITS (-TCO <sub>2</sub> E)	% OF EMISSION CREDITS
Electricity, Renewable Credit, Contract	10,770	9%
Electricity, Renewable Credit, GO	107,275	91%
Electricity, Renewable Credit, PPA	130	0%
Total	118,175	100%

1 PPA - Power Purchase Agreement

2 GO - Guarantees of Origin (renewable energy attribute certificate)

## Indirect Emissions from Product Manufacturing

In FY2024, we launched our Manufacturing Climate Program, engaging nine strategic suppliers that collectively account for approximately 23% of our total shipment volume. These suppliers were required to report energy and water consumption data across their tier 1 to tier 3 operations involved in fulfilling C&A orders, covering a total of 147 production units.

This marked the first time suppliers were requested to engage their tier 2 and tier 3 subcontractors, extending traceability and accountability deeper into the supply chain, while aligning with evolving reporting standards. Cross-functional teams across C&A played a critical enabling role in supporting supplier engagement and facilitating consistent data collection, helping to navigate the complexities of multi-tier reporting and ensure alignment with environmental disclosure standards.

Key outcomes were driven by supplier ownership:

- Approximately 70% of the 147 production units successfully reported the required energy and water consumption data.
- 8% of the units reported using coal as a thermal fuel and have developed phase-out plans scheduled between 2025 and 2027.
- 73% of the production units established their own carbon reduction targets for the period 2025–2045, along with corresponding action plans.
- 70% of the required production units completed and passed the mandatory GIZ Climate Action Training for the Fashion Industry. This training equips suppliers with knowledge on climate change impacts, greenhouse gas accounting, and emission reduction strategies.

Building on the positive outcomes of the FY2024 program, we are now consolidating lessons learned to inform and strengthen our approach for FY2025 and beyond. As part of this evolution, we plan to adopt the Worldly Facility Data Manager (FDM) to systematically collect validated energy and water consumption data from our key suppliers. This transition will enhance data quality and support compliance with CSRD requirements, which emphasize the use of primary data for carbon accounting and reporting.

## Case Study: Solar Rooftop Initiative

As part of our broader commitment to reducing global emissions, we are supporting the increased adoption of renewable energy across our supply chain. In 2024 we partnered with Cascale to support the GIZ PDP Solar Rooftop Initiative in Bangladesh, which is one of our key sourcing regions. This initiative is designed to facilitate the implementation of rooftop solar projects in production facilities, including comprehensive support ranging from technical and economic assessments to connections with trusted local service providers.

As part of this initiative, 26 of our production units in Bangladesh were officially registered as participants in the GIZ PDP Solar Rooftop Initiative in October 2024. These units successfully completed onboarding training sessions by February 2025. Following a thorough evaluation process, GIZ selected 20 of the 26 production units based on readiness and impact potential, and these will move forward into three implementation phases in 2025-2027.



# E2 Pollution and E3 Water and Marine Resources

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 by adhering to strict environmental standards and actively working to reduce their ecological footprint.

We are proactive in managing the environmental performance of our suppliers and 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 water, air, land use, biodiversity, and noise or odor pollution. To ensure these commitments are met, we establish clear environmental requirements through our Environmental

Stewardship Manual and Implementation Guidelines (in the Supporting Guidelines to the Code of Conduct), regularly conduct audits and assessments, and work collaboratively with suppliers to build capacity and share best practices.

We engage our suppliers in targeted initiatives such as safer chemical management, water stewardship programs, and waste reduction projects tailored to their geographic and operational contexts. Progress is monitored against environmental performance indicators, and corrective actions are implemented where necessary to drive continuous improvement. This section discloses information on the following material topics: pollution of water, soil, living organisms, and air, substances of concern, water and marine resources, microplastics, and biodiversity.

## Impact, Risks, and Opportunities (IROs)

C&A aims to select raw materials that have a lower pollution impact compared to conventional options. We combine this approach with a strong chemical management program in our manufacturing phases. However, significant amounts of chemicals and water are involved in producing and converting raw materials into apparel, and these processes tend to occur in water-scarce areas. 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, which may already be limited or under stress. In conventional cotton farming, excessive pesticide and fertilizer use can contaminate soil, compromising its fertility and disrupting ecosystems. Soil degradation negatively affects crop yields, impacting farmer livelihoods and food security.

In contrast, organic cotton farming avoids synthetic chemical inputs, helping to preserve soil health, protect biodiversity, and maintain ecosystem balance. These concerns relate to our IROs as described below:

E2 POLLUTION				
IRO DESCRIPTION	IRO TYPE	TIME HORIZON	VALUE CHAIN	MATERIAL TOPIC
Chemical usage in raw material production	Negative impact	Long	Upstream	Pollution of air, water, soil and living organisms
Chemical usage in yarn and fabric dyeing and finishing	Negative impact	Long	Upstream	Pollution of air, water, soil and living organisms
Pollution related compliance and reputational risks	Financial risk	Long	Upstream	Pollution of air, water, soil and living organisms
Microplastic shedding in manufacturing and consumer use	Negative impact	Long	Upstream and Downstream	Microplastics

Given the close interconnection between pollution policies and actions and our impact on water and marine resources, we are presenting our impacts, risks, and opportunities related to water and marine resources in this section as well.

The double materiality assessment process that informed these IROs did not include direct engagement with affected communities. Instead, we gathered insights through surveys with stakeholders who represent these communities and consulted internal experts actively engaged in dialogue with them.

**E3 WATER**

IRO DESCRIPTION	IRO TYPE	TIME HORIZON	VALUE CHAIN	MATERIAL TOPIC
Water usage in raw material production	Negative impact	Long	Upstream	Water consumption, withdrawal
Water usage in yarn & fabric dyeing and finishing	Negative impact	Long	Upstream	Water consumption, withdrawal, discharge
Water related operational risks	Financial risk	Long	Upstream	Water consumption, withdrawal, discharge

# Pollution

## Strategy

In addition to meeting our rigorous standards within their own operations, we also expect our suppliers to cascade our requirements down to their own partners. Suppliers must ensure that all production facilities, suppliers, and subcontractors involved in production for C&A follow our requirements as listed in the C&A Code of Conduct for Suppliers (“C&A Code of Conduct”) and the 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. 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.

### POLICIES

Our Environmental Stewardship requirements consider different types of risks based on the manufacturing processes conducted within each factory. The Environmental Stewardship Program continues to focus on strategic tier 2 wet processing facilities because this is where the bulk of the environmental impact occurs. However, in 2024 our environmental oversight was expanded to include tier 1 facilities where cut, sew, and packaging activities take place. See additional details below under “Environmental Assessments” on [page 34](#).

As clearly specified in the Chemical chapter of our Environmental Stewardship Manual, suppliers must also assign responsibility for environmental performance to a senior management representative.

Our C&A Code of Conduct contains clear 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 the 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 should 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.

We require a management system approach to pollution minimization, and our Implementation Guideline – formally known as the [Supporting Guidelines to the Code of Conduct \(CoC\) Merchandise Suppliers](#) – includes many of the specific expectations we have of our suppliers. This approved and publicly available document outlines the operational environmental standards suppliers must meet to support our Code of Conduct. These expectations include:

- 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 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.

Our Implementation Guideline also details how we expect suppliers to engage with us on remediation and capacity building. For example, all suppliers are expected to:

- Participate in environmental remediation processes undertaken by C&A in the spirit of learning and continuous improvement.
- Inform and train workers on the environmental impacts of their production and the relevant measures to avoid or mitigate the impacts.
- Engage in capacity building activities assigned by C&A. This includes training and awareness-raising sessions provided by C&A and our external partners.

## 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 in selected wet-processing production units must meet the latest version of the ZDHC MRSL conformance level 1 or higher. This target is detailed in the C&A Environmental Stewardship Manual, and we have trained our key suppliers on this updated requirement.

In 2024, 93% of chemicals used have met this target.

Progress towards our chemicals target is mandatory and monitored by the Sustainability Operations department and the Environmental Stewardship Team. Suppliers who do not meet the target are subject to follow-up actions, which may include additional training, corrective action plans, or escalation within C&A's supplier management framework to ensure compliance and continuous improvement.

## Progress Update/Actions

Our actions to address pollution encompass assessments, industry collaboration, careful management of chemical inputs, processes, and outputs. We also work to continuously build the capacity and knowledge of our teams and our suppliers.

Where data are still emerging, we aim to collaborate with others on the leading edge, such as through our work on microfibers.

## ENVIRONMENTAL ASSESSMENTS

Many of our suppliers' processes, whether in factories or mills, are interrelated. Consequently, environmental impacts such as energy, water, and chemical use cannot be assessed in isolation. When assessing environmental impact, wet processing emerges as the most critical stage, and mostly falls under tier 2. We focus on understanding and improving the environmental performance of these manufacturers, namely fabric mills, dyeing facilities, and washing plants.

To track and review their progress in reducing the negative environmental impact of manufacturing, we use the Higg Facility Environmental Module (FEM). Manufacturers fill out a comprehensive self-assessment questionnaire 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 have been verified, manufacturers receive customized advising and capacity building from C&A based on their performance. 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 2024, 165 of our selected wet-processing manufacturers completed the Higg FEM assessment and had their data verified by third parties.

For facilities with less significant environmental risks, including tier 1 units with cutting, sewing, and packaging, C&A implemented a basic procedure in

2024. If these units do not already have a verified or non-verified Higg FEM assessment, the units must conduct a self-assessment developed by the C&A Environmental Stewardship Team which covers key environmental compliance questions. These questionnaires are then reviewed by our Environmental Performance Specialists. Through this approach, we have expanded our environmental oversight to all tier 1 units.

## 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. We have implemented a comprehensive approach which includes input, process, and output management, alongside collaboration with our peers and partners. Our 2028 goal is that 100% of the chemicals used are approved safe chemicals<sup>1</sup>.

## Our Approach to Safer Chemicals

- Safer Chemicals: Identify safer chemicals, drive their adoption, and eliminate the 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.

<sup>1</sup> 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.

**CHEMICAL INPUT MANAGEMENT**

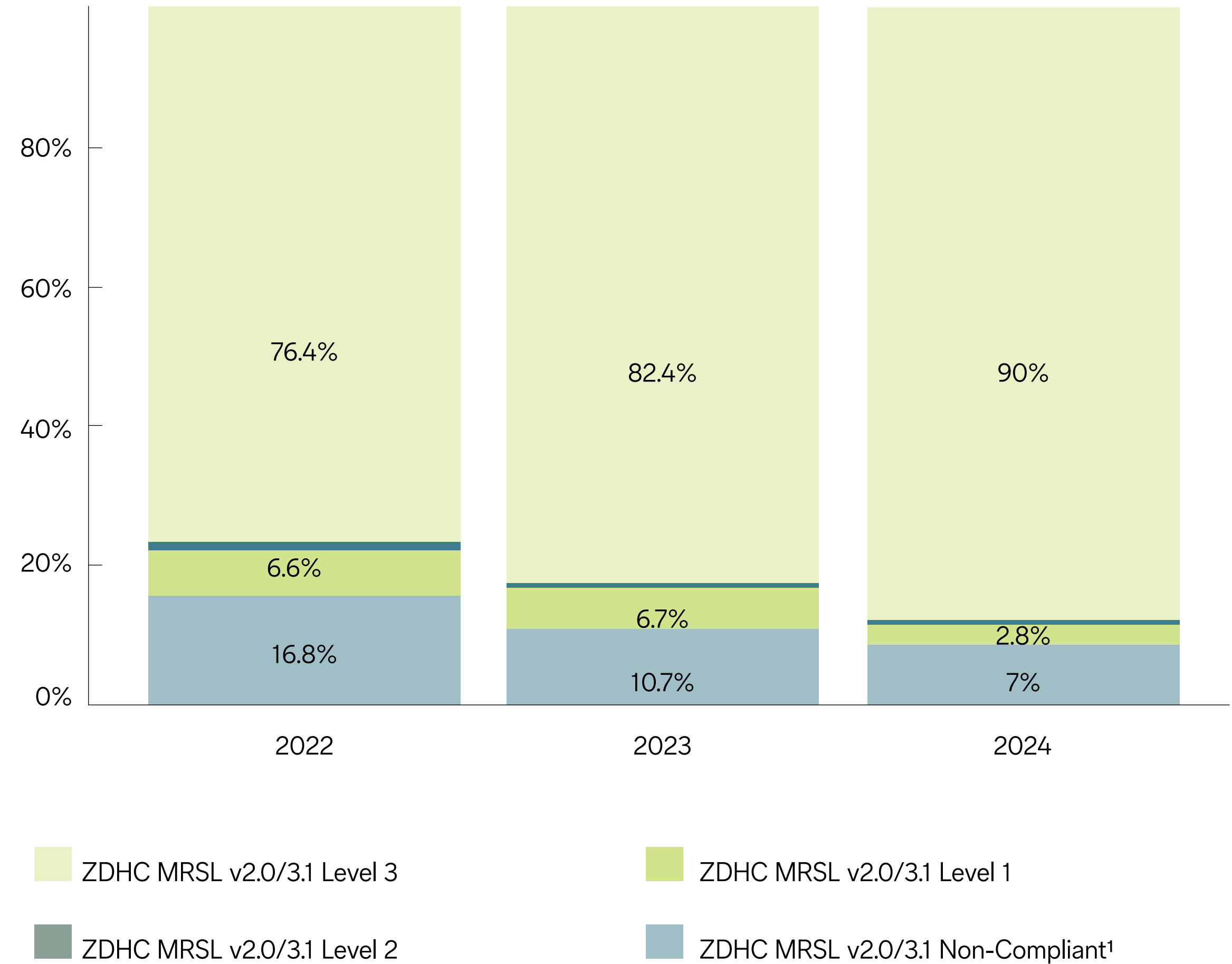
C&A suppliers must source chemicals that meet certain industry requirements, such as those of the Zero Discharge of Hazardous Chemicals (ZDHC) Foundation. In practice, this means that chemical products are matched and checked against the ZDHC Manufacturing Restricted Substances List (MRSL). We track 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 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 89.3% in 2023 to 93% in 2024 by count. In 2024, we also started tracking the average conformance rate by weight and it was 83.4%. As we aim for 100% (by count), we continuously improve our supply chain and work directly with suppliers through our Environmental Stewardship Team on the conformance of their chemical inventories. When needed, we visit suppliers to validate and discuss the accuracy of the chemical information they have disclosed. The team immediately follows up with suppliers when performance levels decline and works with them to define a corrective action plan.

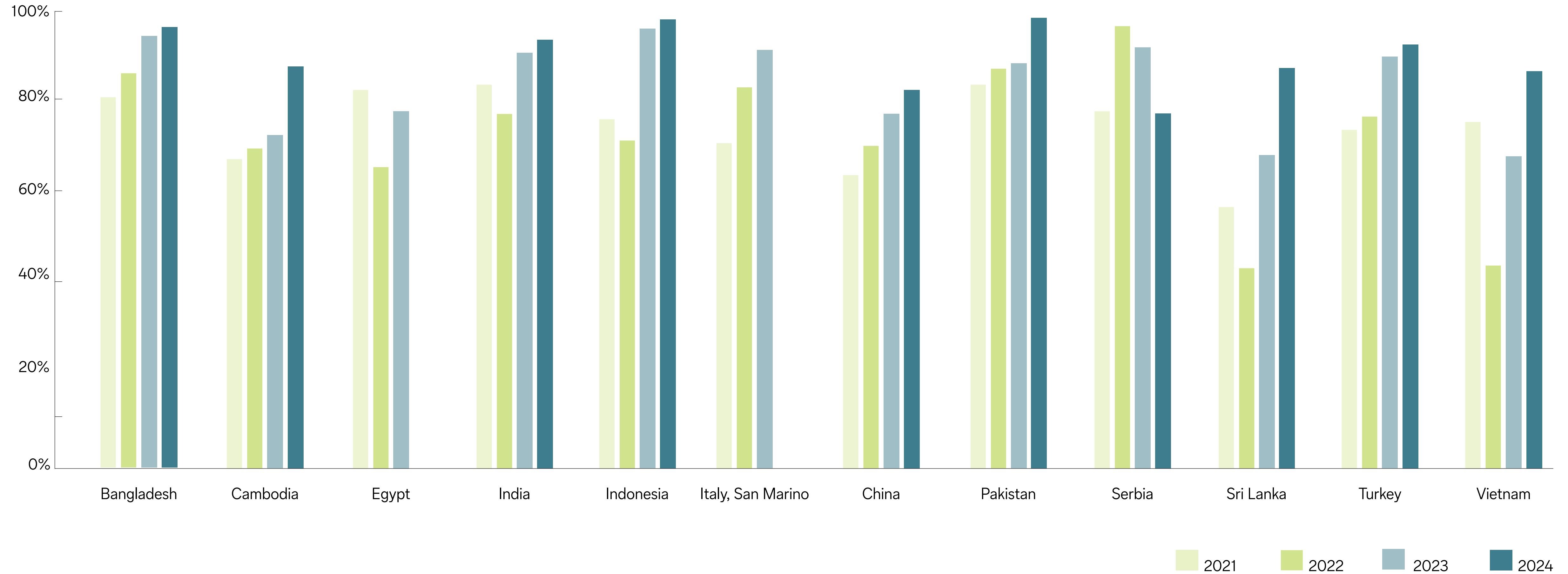
The MRSL Conformance Chart shows the distribution rate of the MRSL conformance level. Over 90% of our participating suppliers have reached MRSL Level 3 conformance, the highest conformance level within the ZDHC chemical ranking. This continued progress reflects ongoing efforts to support suppliers in switching to safer alternative chemicals and sourcing ZDHC-compliant chemicals.

**MRSL Conformance Level 2023 vs 2024<sup>1</sup>**



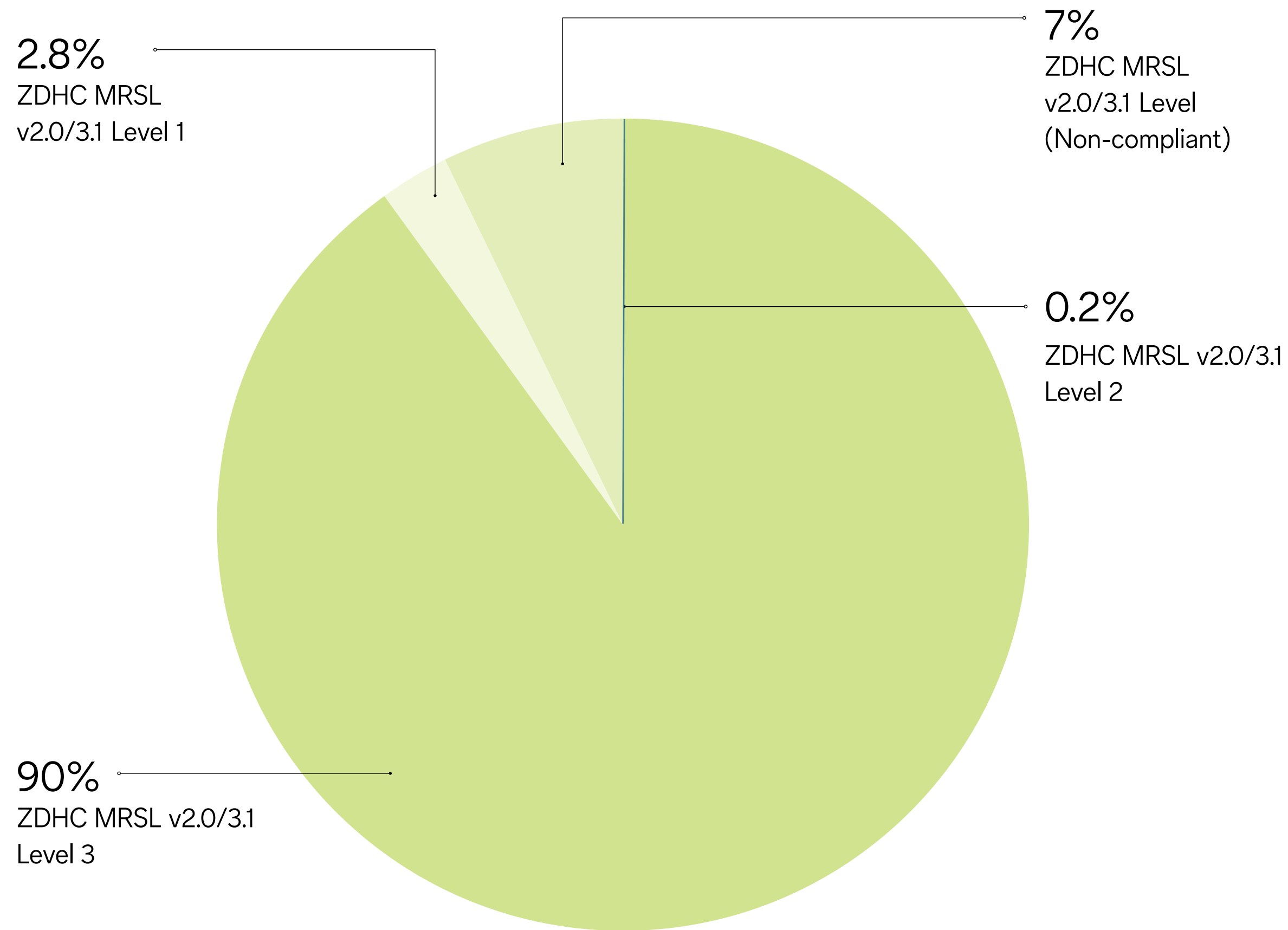
<sup>1</sup> Chemical conformance data are collected on a calendar-year basis. Starting in 2024, monthly data will be gathered from March through December instead of January through December, allowing sufficient time for communication and training. In cases where operations were halted or a production unit did not perform wet processing during a given month, only months with available data are included, provided there are at least 10 months of data in total.

## Average Conformance % by Country 2021–2024<sup>1</sup>



<sup>1</sup> The chemical conformance data are collected based on the calendar year. 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 2021 to 2024.

## ZDHC MRSL 2.0 & 3.1 Conformance 2024 (by Count of Chemical Products) <sup>1</sup>



90%  
ZDHC MRSL v2.0/3.1  
Level 3

2.8%  
ZDHC MRSL  
v2.0/3.1 Level 1

7%  
ZDHC MRSL  
v2.0/3.1 Level  
(Non-compliant)

0.2%  
ZDHC MRSL v2.0/3.1  
Level 2

<sup>1</sup> The chemical conformance data are collected based on the calendar year.

## 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 C&A suppliers are required to provide products that are in compliance with the EU’s Registration, Evaluation, Authorization, and Restriction of Chemicals (REACH) regulation, including compliance related to any Substances of Very High Concern (SVHC).

As this is very important for both environmental and human health, suppliers may be required to provide further information to C&A to substantiate their compliance. Where suppliers are providing C&A with products that contain SVHC 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 a Substance of Very High Concern (SVHC) is determined by European authorities to require phase-out, it is added to the official REACH Authorization List (Annex XIV). Following its “sunset date,” manufacture or sale of the substance in Europe is prohibited unless specifically authorized. C&A requires that all supplied products are free of any substances on this list once their phase-out deadline has passed.

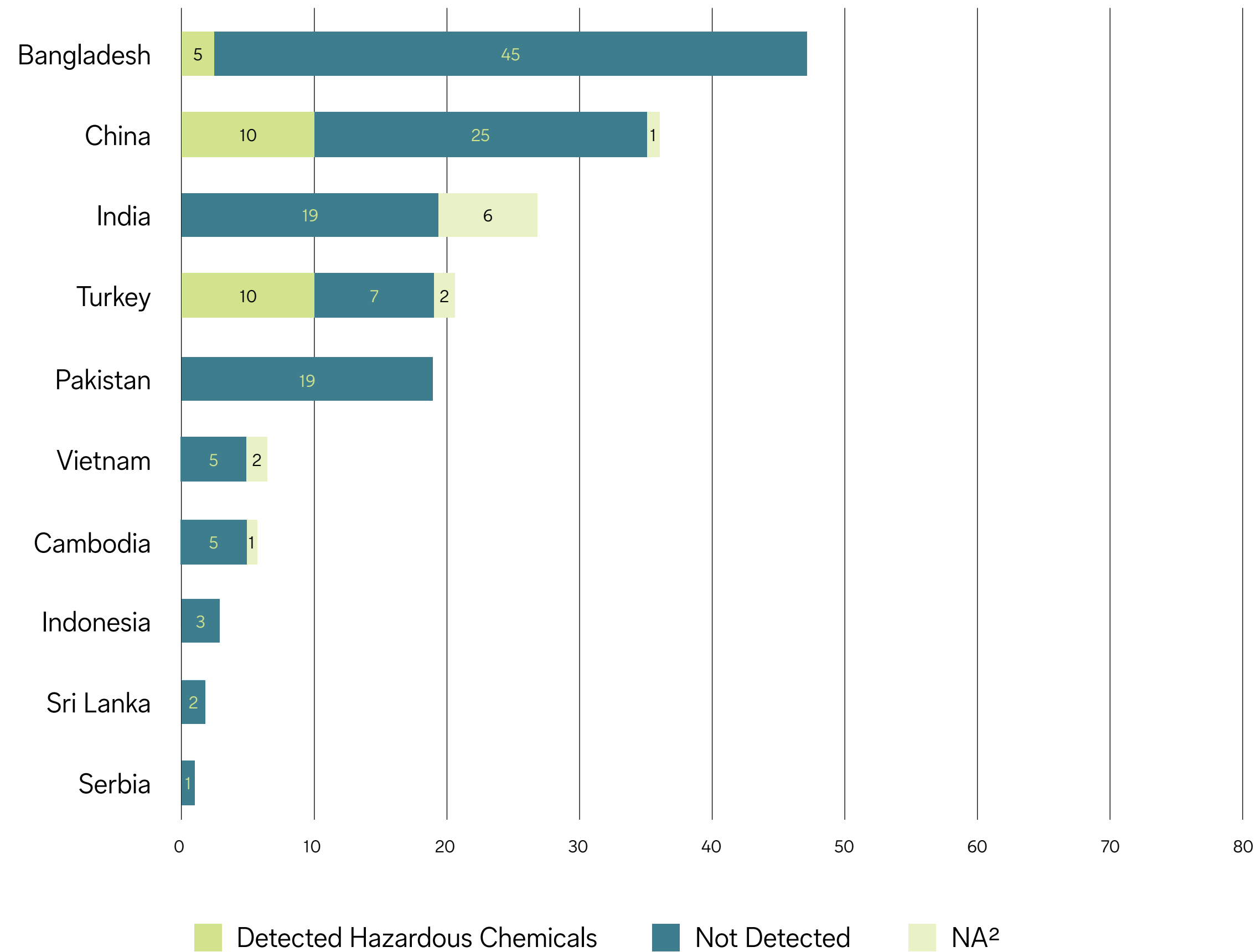
### PROCESS MANAGEMENT

Process management is another angle we examine when it comes to chemical management. Every factory, especially in tier 2 where most of the chemicals are used, must have 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. 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 monthly.
- **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.

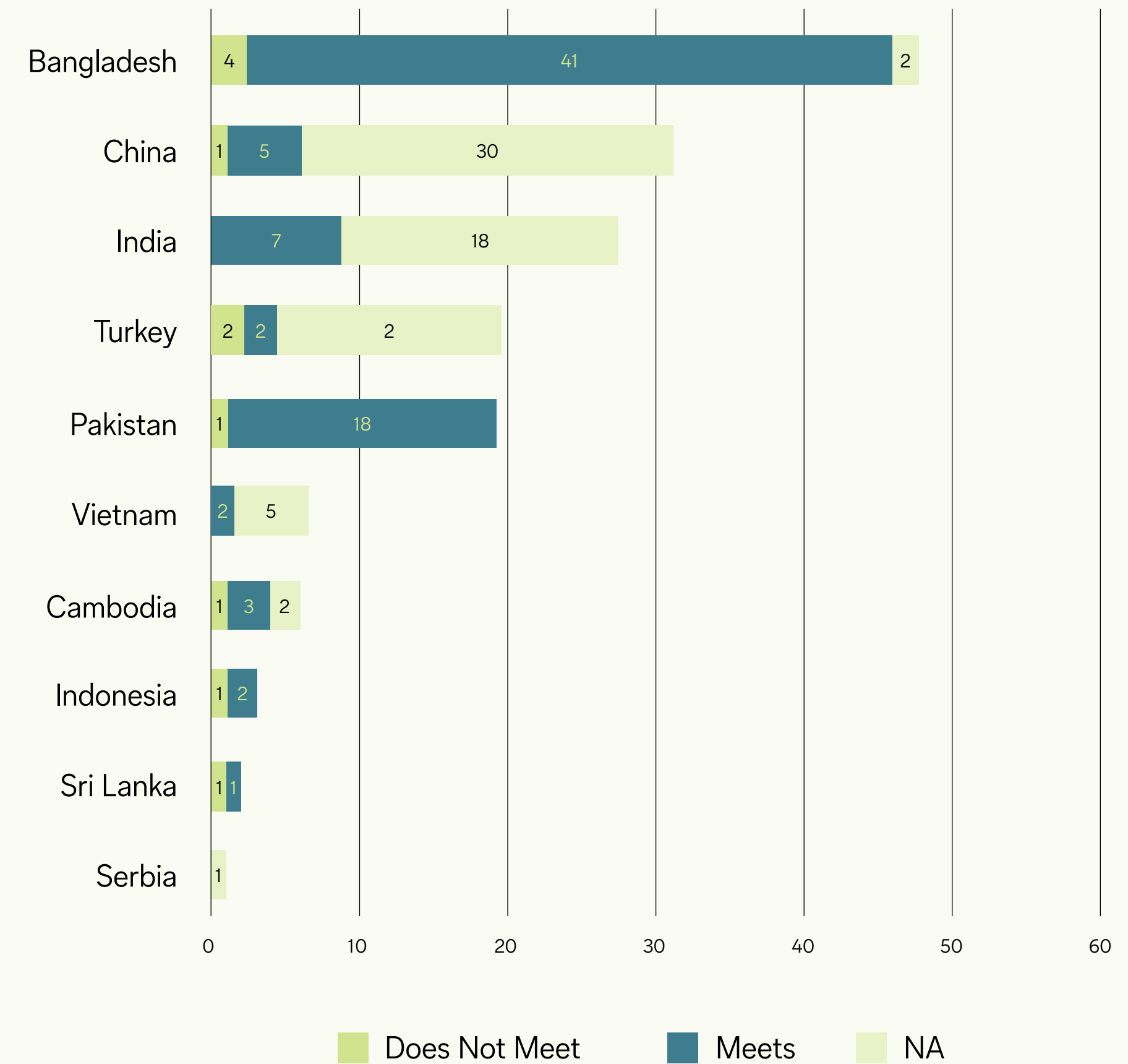
## MRSL Chemical Detection in Raw Wastewater By Sourcing Country<sup>1</sup>



<sup>1</sup> The sampling period for the data was November 2023 to October 2024. For the full list of parameters tested and the limits of foundational requirements please refer to ZDHC Wastewater Guidelines v2.1.

<sup>2</sup> 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 ZDHC Foundation.

## Foundational Requirements of Conventional Parameters, Metals & Anions in Directly Discharging Production Units by Sourcing Country<sup>3</sup>



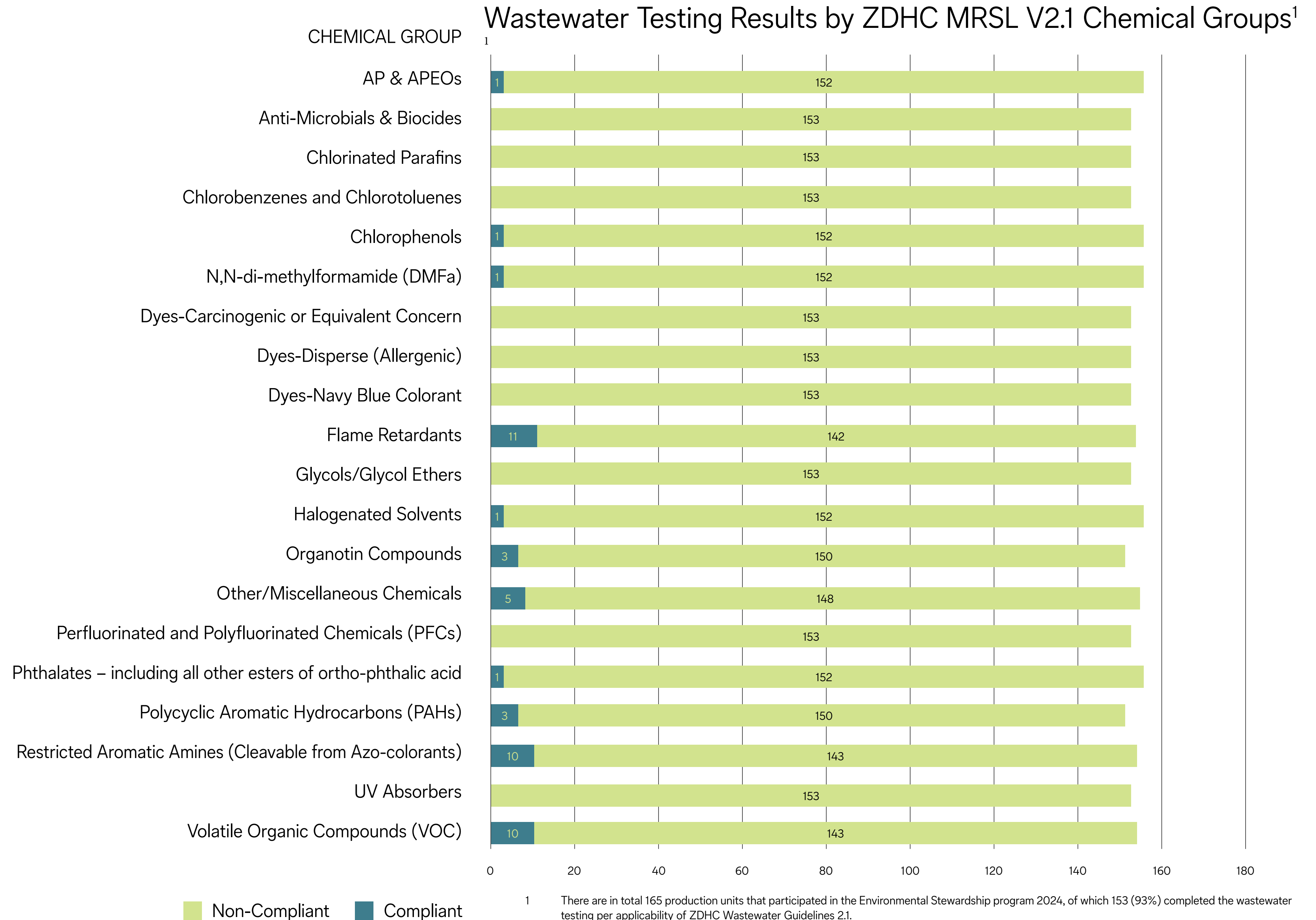
<sup>3</sup> There are in total 165 production units that participated in Environmental Stewardship program in 2024, of which 91 (55%) directly discharge wastewater to the surrounding water bodies.

**OUTPUT MANAGEMENT**

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 and sludge 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. C&A is also committed to publicly reporting progress in accordance with the ZDHC standards.

Wastewater sampling and testing was conducted from November 1, 2023, to October 31, 2024. Based on the annual wastewater testing results, in which 165 facilities took part, 86% of sites have no MRSL chemical detection in their raw wastewater and 89% 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 a decrease in MRSL chemical detection rate as facilities are more aware of the hazardous chemicals used in the second year of adopting ZDHC Wastewater Guidelines V2.1. We continuously support production units to find out the root causes of non-conformances and work on remediation. The following chart gives an overview of hazardous chemical groups that continue to present challenges for our partner facilities. All data have been reviewed and confirmed by C&A after cross-checking with the laboratory testing reports.



## Engaging Suppliers with Training

Effective chemical management requires specialized knowledge and practical expertise. In the summer of 2024, our internal Environmental Stewardship team delivered training courses on 15 environmental topics in English, Chinese, and Turkish. These included:

- Environmental Management System (EMS)
- Chemical Storage and Handling
- Higg FEM 4.0 and Top Issues
- Effluent Treatment Plant (ETP) Management
- Air Emissions
- Root-Cause Analysis and Remediation

Additionally, the course conveys the importance of chemical management and of having the necessary infrastructure in place to reduce negative environmental impacts.

In total, 15 sessions and more than 1,100 person-hours of training were provided to representatives responsible for environmental management at their sites, based on identified learning needs and relevance. The program not only equipped suppliers with essential knowledge and skills but also improved their engagement with us. Building from the success of this approach, we plan to develop training courses 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 for C&A. Addressing these challenges requires a multifaceted approach that integrates holistic and sustainable practices. We are committed to promoting lower-impact materials – for example, organic cotton cultivated without synthetic pesticides and fertilizers. Compared to conventional cotton farming, organic cotton production results in cleaner and safer waterways, healthier ecosystems, enhanced biodiversity, improved soil fertility, and reduced costs for farmers.

See additional details on our raw materials strategy on [page 44](#) under “Resource Use and Circular Economy.”



# Water

The textile sector is a major consumer of water, extracting large amounts of water from natural sources such as rivers, lakes, and groundwater. Water use occurs throughout the 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.

Cotton, a primary textile source, illustrates one example of water use considerations. Cotton cultivation requires significant water resources. 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. During manufacturing, our suppliers can potentially release pollutants into nearby water sources, such as rivers, lakes, and oceans, contaminating water and harming aquatic life. Our chemical management measures described above under "Safer Chemicals and Water Stewardship" aim to keep water free from harmful substances in production processes.

Throughout the life cycle of our products, we consider 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.

## Case Study: Water Use Data Gathering

Since apparel production regions tend to be regions impacted by water scarcity, C&A has an established process of assessing water scarcity as a risk factor through the Higg Facility Environmental Module. In 2024, we conducted a pilot on tracking the water use of 104 key tier 2 production units with wet processes. The tracking pilot informed us that at least 5,882,278,650 liters of water (including domestic water) were used for C&A production in total<sup>1</sup>.

This pilot marked a foundational step in building visibility into water use across tier 2 wet processing units - facilities that are not directly owned by our partners but are critical to understanding our broader environmental footprint. In 2025, we will scale up validated data collection and compare it with 2024 results to identify hotspots and guide targeted water-saving actions.

<sup>1</sup> Water consumption data were collected from FEM assessments in 2023 which were verified by external verifying bodies in 2024. Production allocation data were self-disclosed by facilities through a separate C&A questionnaire sent to them in 2024.



# Microfibers

Tiny fibers are released from natural, synthetic, and regenerated cellulosic textiles throughout their lifecycles. These fibers, commonly known as microfibers, fiber fragments, or in the case of synthetics, microplastics, are shed to varying degrees. Understanding the full extent of the physical and toxicological impact of this shedding is an emerging area of research. As these fibers are released into the environment through various pathways, there is growing recognition within the textile industry of their potential to cause harm. Wildlife and human health, marine and freshwater systems, as well as air and soil can be affected by microfiber release. Effective mitigation requires multi-layered research as a prerequisite, and must address all fiber types, given their distinct shedding profiles and the growing body of evidence on environmental and health impacts across ecosystems.

Since 2023, C&A has been a member of The Microfibre Consortium (TMC), an organization that facilitates the development of practical solutions

for the textile industry to reduce microfiber fragmentation and release into the environment during manufacturing and throughout the product life cycle. As a signatory of the Microfibre 2030 Commitment, C&A has been actively involved in testing and analyzing microfiber shedding from our textile products, both during and after production. The results of this testing will inform future product research and development, helping us to design fabrics and garments with reduced microfiber release.

In addition, C&A is a project partner in Fashion for Good's initiative "Beyond the Break," which aims to compare different methodologies for assessing microfiber shedding and to evaluate how various technical fabric and fiber properties influence this process. These collaborations support C&A's broader commitment to mitigating environmental impact and align with regulatory priorities under CSRD and Ecodesign for Sustainable Products Regulation (ESPR), where microfiber pollution is a key criterion.

# Biodiversity

Biodiversity is a cross-cutting topic, encompassing the protection and regeneration of ecosystems and the healthy interactions among organisms that sustain environments and communities. 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, continues to be

assessed. We have identified negative impacts from monoculture and chemical use, deforestation, and biodiversity-related compliance risks in the upstream value chain. These risks are linked to pollution, climate change, circularity, and materials, and are addressed through our broader sustainability strategy.

## E4 BIODIVERSITY

IRO DESCRIPTION	IRO TYPE	TIME HORIZON	VALUE CHAIN	MATERIAL TOPIC
Biodiversity loss due to monoculture and chemical usage (fertilizer, pesticides, insecticides) in raw material production	Negative impact	Long	Upstream	Biodiversity
Biodiversity loss due to deforestation	Negative impact	Long	Upstream	Biodiversity
Biodiversity related operational and compliance risks	Financial risk	Long	Upstream	Biodiversity

# E5 Resource Use and Circular Economy

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 recirculate and waste is minimized. We believe that by implementing circularity principles, we can achieve long-term impact reduction as well as positive business effects.

## Impacts, Risks, and Opportunities (IROs)

The production of our products and packaging requires a substantial amount of materials. The way products are designed has a significant impact on the end of life. Our raw material and circularity actions address these impacts.

By aligning products and materials with circular economy principles, we can reduce resource use, minimize waste, and lessen environmental impact. These practices

not only lower production costs but also strengthen competitiveness by enhancing brand reputation, ensuring regulatory compliance, and building customer trust.

The transition to a circular system is essential – but it comes with significant logistical, financial, and technological hurdles.

One significant challenge is that our operations remain heavily dependent on raw materials, yet the extraction phase occurs at tier 4 of our value chain, where our influence is limited.

### E4 CIRCULARITY

IRO DESCRIPTION	IRO TYPE	TIME HORIZON	VALUE CHAIN	MATERIAL TOPIC
Raw material usage	Negative impact	Long	Upstream	Resource use
Raw material related operational and compliance risks	Financial risk	Long	Upstream	Resource use
Products designed for circularity	Positive impact	Long	Own operations	Circularity
Limited ability to re-use and recycle products	Negative impact	Long	Own operations, downstream	Circularity
Circularity related operational and compliance risks	Financial risk	Long	Own operations, downstream	Circularity
Waste impact related to production and distribution of apparel	Negative impact	Long	Own operations, downstream	Waste
Waste related reputational and compliance risks	Financial risk	Long	Own operations, downstream	Waste

However, persisting with linear business models will ultimately amplify risks across multiple areas. Companies following a linear product path face reduced resilience, mounting regulatory pressure, and potential liabilities as global standards evolve. Climate change further compounds these risks by disrupting global crop yields and intensifying resource scarcity – especially for critical materials like cotton and resource inputs such as water.

Overconsumption further accelerates this resource depletion, which can threaten stability throughout a supply chain that is already facing regulatory shifts and market volatility.

These converging factors underscore why resource efficiency and circularity are material priorities for C&A. Addressing them not only mitigates risk but unlocks strategic opportunities, for example, the following:

1. Innovative, multifunctional product design that extends lifecycle and reduces waste.
2. Industry collaboration to accelerate circular innovation and shared solutions.
3. Emissions reduction through material efficiency and decreased reliance on virgin resources.
4. Attraction of new customer segments seeking more sustainable alternatives.
5. New revenue streams from circular business models.
6. Lower exposure to carbon and resource-related taxes, enhancing financial resilience.

By embracing circularity, we aim to contribute to the transformation of our industry – supporting a more sustainable, competitive, and secure future.

# Strategy

As described throughout this report, our sustainability strategy is anchored in three core areas of impact: what we make, how we make it, and how our consumers use their clothes. Across each of these dimensions, resource efficiency and circular economy principles are essential drivers of transformation.

## 1. What We Make

We are working to increase the use of lower-impact materials and to adopt a more demand-driven business model that helps to reduce overproduction and minimize waste. By streamlining our product collections, with a greater focus more on quality, versatility, and longevity – so that more items we create contribute to a more circular system.

## 2. How We Make It

We are integrating circularity by focusing on design principles that support durability, disassembly, and recyclability.

In collaboration with supply chain partners who share our commitment to resource efficiency and responsible practices, we are working to reduce reliance on virgin resources and increase the use of recycled materials wherever feasible.

## 3. How Our Consumers Use Their Clothes

We are supporting consumers in extending the life of their garments through education, greater transparency, and practical tools. From care instructions to repair tips and take-back programs, we are developing solutions that enable more sustainable choices and help foster a culture of reuse and recycling.

This strategy not only supports our environmental goals but also strengthens our business resilience, aligns with evolving regulations, and meets growing consumer demand for more sustainable fashion.

# Resource Use

“Resource use” 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.

Our primary material is cotton (59%), followed by polyester (25%), and regenerated cellulosic (8%). We also use lower volumes of materials such as polyamide, elastane, acrylic, linen, wool, cashmere, and others.

One way we optimize these resources is to prioritize the use of more sustainable or lower impact materials over conventional materials.

## More Sustainable Materials

### More Sustainable Materials Target

At C&A, we are committed to increasing the use of more sustainable, or lower impact, materials. We are 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.

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 together account for 92% of our raw materials.

### OUR APPROACH

Our approach to our more 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 more sustainable, or lower impact,

materials available at scale. We are committed to partnerships in the apparel industry to research, pilot, and scale innovative and more sustainable alternatives to textiles fibers.

### HOW WE DEFINE AND CONFIRM MORE SUSTAINABLE MATERIALS

We define a more sustainable, or lower impact, material as one that has less of an 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 Better Cotton, certified recycled polyester and nylon, and regenerated cellulose certified to the Sustainable Viscose Chain of Custody Standard. This also applies to animal-derived materials, as set forth in our [Animal Welfare policy](#).

### 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.

## Case Study: Circulose®

Recycling discarded textiles is a foundational strategy in circular fashion. It helps recover fiber value, reduce reliance on virgin resources, and divert waste from landfill or incineration. This practice contributes to “closing the loop” – which means keeping materials in circulation for as long as possible to minimize environmental impact. In 2023, we started our first product application trials with innovators such as Circulose®, which offer technology aimed at recycling used cotton textiles into a feedstock for viscose and lyocell fibers. In 2024, the first capsule containing Circulose® was developed, which includes flat knit tops and denim bottoms for men and women, available in stores as of mid-August 2025.



## Progress Update/Actions

In 2024, 77.45% of our core materials met requirements to be considered “more sustainable.” In 2024 we put a strong focus on increasing the uptake of recycled materials, successfully doubling it from 5% in 2023 to 10% in 2024. While this marks meaningful progress, we recognize that much more is needed to meet the scale of environmental challenges ahead. The focus on increasing our recycled materials will ultimately support our overall goal of achieving 100% more sustainable core materials by 2028, a goal we remain committed to achieving.

## Material Inflows

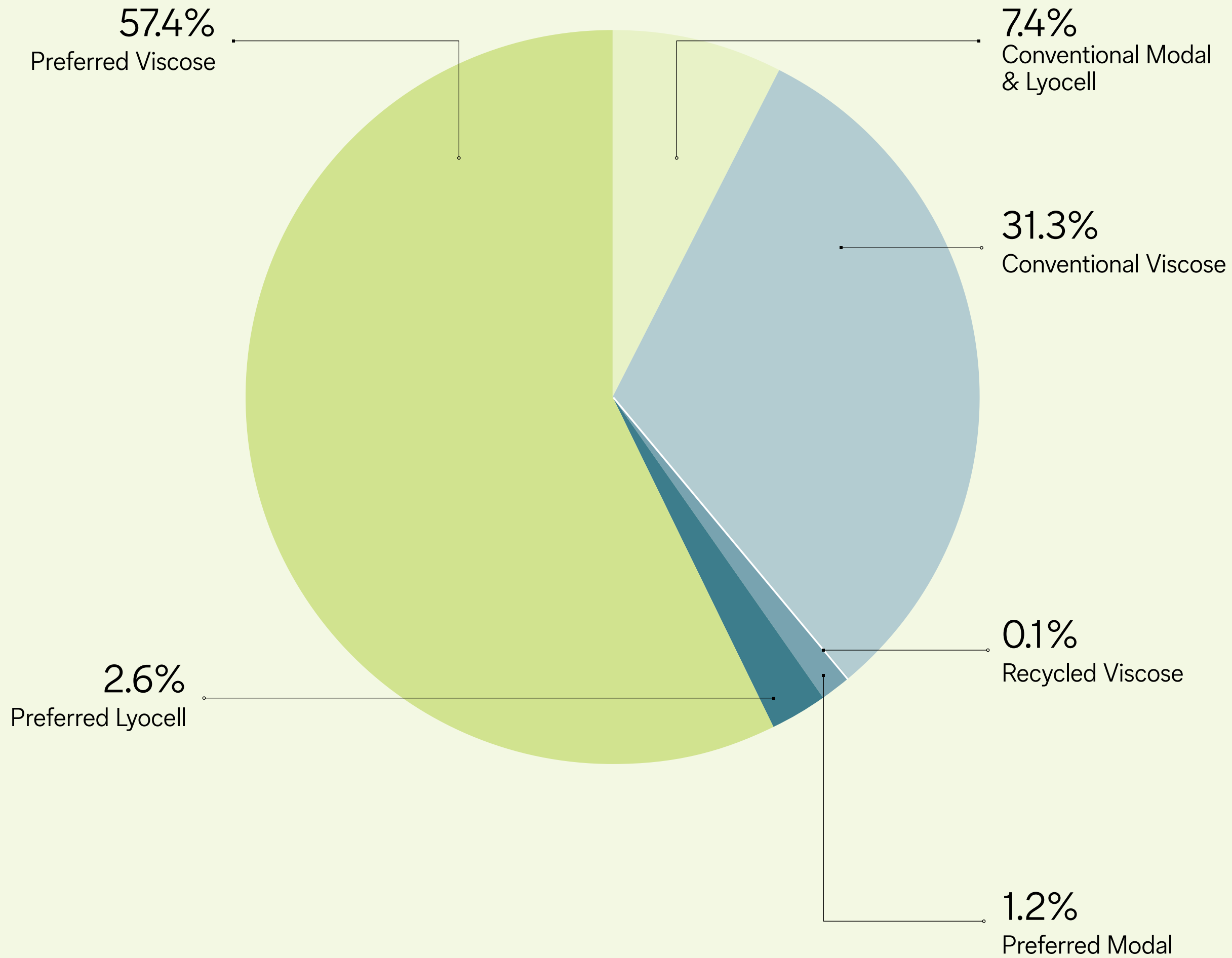
MATERIAL MIX	MATERIAL WEIGHT(mt)	SHARE OF MATERIAL(%)
Cotton	38,975	58.64%
Polyester	16,430	24.72%
MMC	5,538	8.33%
Polyamide	2,244	3.38%
Acrylic	1,201	1.81%
Elastane	1,025	1.54%
Polyurethane	222	0.33%
Linen	470	0.71%
Wool	170	0.26%
Cashmere	44	0.07%
Leather	36	0.05%
Other Fiber	103	0.15%
Grand Total	66,459	100.00%

## Recycled Materials Volume & Share

RECYCLED VOLUME & SHARE	MATERIAL WEIGHT (mt)	SHARE OF MATERIAL (%)
Recycled Cotton	940	1.41%
Recycled Polyester	5,491	8.26%
Recycled Polyamide	151	0.22%
Recycled Acrylic	27	0.03%
Recycled Wool	32	0.04%
Recycled Regenerated Cellulosic	4	0.00%
Recycled Cashmere	3	0.00%
GRAND TOTAL	6,648	9.96%

## Regenerated Cellulosic Fibers Breakdown

More Sustainable Regenerated Cellulosic vs Conventional Cellulosic Fibers

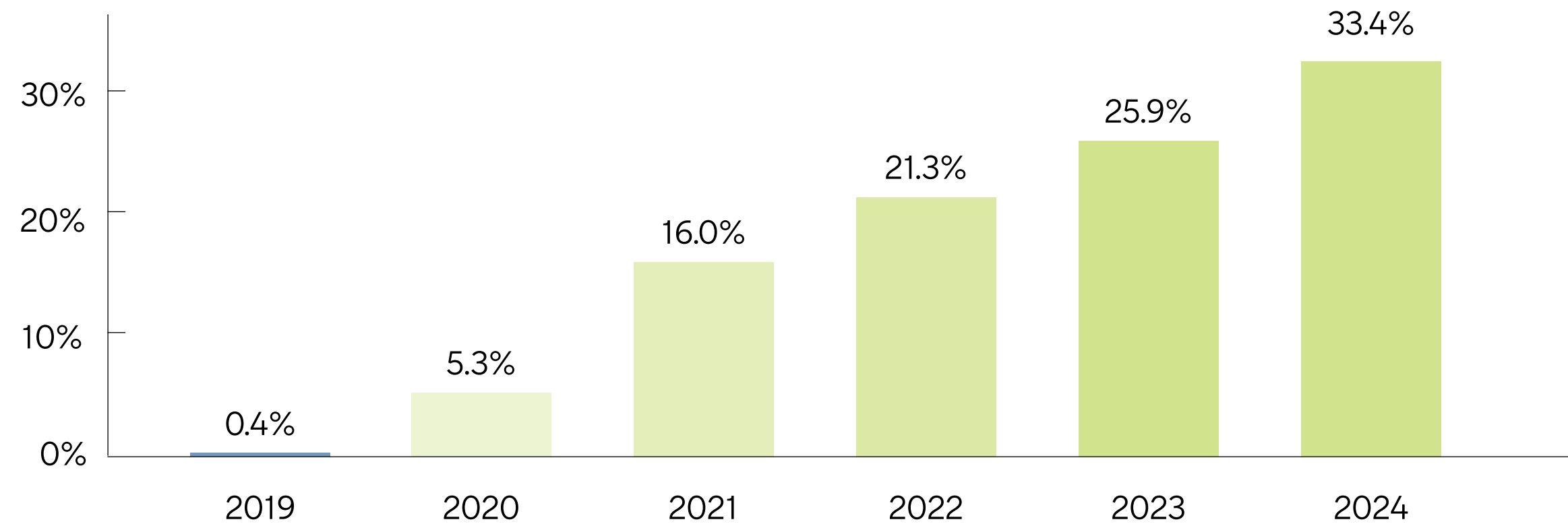


## More Sustainably Sourced Cotton

MORE SUSTAINABLE COTTON	2019	2020	2021	2022	2023	2024
Better Cotton (BCI)	63.3%	52.8%	54.7%	66.0%	68.7%	61.6%
In-Conversion Cotton			1.6%	5.7%	4.9%	0.5%
Organic Cotton	36.0%	46.5%	42.8%	25.7%	25.5%	33.8%
Recycled Cotton		0.3%	0.4%	0.9%	0.9%	2.4%
<b>GRAND TOTAL</b>	<b>99.3%</b>	<b>99.6%</b>	<b>99.5%</b>	<b>98.3%</b>	<b>99.9%</b>	<b>98.3%<sup>1</sup></b>

<sup>1</sup> Conventional cotton makes for the remaining 1.7% for 2024

## Recycled Polyester Share



## Case Study: Full Circle Textiles Project – Polyester

Now in its fourth year, the Full Circle Textiles Project by Fashion for Good is focused on scaling post-consumer polyester recycling through innovative recycling methods. 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. Within the project, we are comparing different innovators' methods to determine the best scenarios for applying each new approach. This

project helps us understand the barriers, impacts, and opportunities in the chemical recycling of polyester. In the scope of this project, we are collaborating with Arvind, Teijin, Cure, Syre, and Revalyu. This selection involves partners from different steps of the supply chain and covers several recycling technologies, which show different strengths and are compared in terms of use cases and application potential.

## Case Study: Haelixa Physical Tracing

The use of organic cotton is an important component of our sustainable material target. Organic cotton is free from synthetic pesticides and fertilizers, which supports cleaner waterways and healthier ecosystems.

Since verified organic cotton is a key part of our more sustainable materials strategy, DNA-based traceability verifier Haelixa and C&A joined forces to improve the traceability of organic cotton. This partnership aligns with our ongoing effort to collaborate with industry partners to test and expand innovative solutions. The partnership began in 2022 with a pilot initiative and, by 2024, has expanded into a three-year partnership to physically trace some key raw materials C&A uses.

Haelixa's approach employs DNA markers to create a secure, verifiable system for tracing organic cotton along the supply chain. The cotton is tagged with unique DNA markers that serve as a specific identifier.

Once the marker is applied, the cotton is tested through forensic polymerase chain reaction (PCR) methods at various stages in the supply chain to confirm its authenticity. The project currently includes a selection of our organic cotton sourced from India and Greece, involving cotton ginners and spinners. The marker is also applied to certain cashmere products.

This fiber-forward approach guarantees the legitimacy of the materials used in the final product. Additionally, this project is part of C&A's broader efforts to boost supply chain accountability and to provide customers with greater transparency, helping to strengthen confidence.

# Paper Packaging

Paper packaging is another area where we are working to improve sustainable sourcing. To support this, we published an [Ancient and Endangered Forest Conservation Policy](#). As of early 2024 we joined the Canopy [Pack4Good](#) initiative and we are committed to using only recycled paper, Forest Stewardship Council (FSC®) certified paper, or next generation solutions by the end of 2025. “Next generation solutions” include the usage of materials traditionally considered waste – such as agricultural residues – that deliver low-carbon alternatives to virgin tree fibers and help reduce pressure on forests, stabilize our climate, and protect biodiversity. In mid-2024 we kick-started our FSC® packaging compliance review and forest risk mapping with all our paper packaging and product paper suppliers. This will help us to identify sourcing risks related to ancient and endangered forests and define appropriate prevention and mitigation actions.

# Animal Welfare

## Animal Welfare Target

In our C&A Sustainability Strategy, we defined the aim of advancing animal welfare throughout our supply chain. Our goal is to source 75% of our core animal-derived materials from sources certified according to defined animal welfare standards by 2028, with a flagship commitment for 100% certified cashmere – a material with particularly high animal welfare, environmental, and social impact.

### OUR APPROACH

C&A has a long-standing dedication to animal welfare, as outlined in our Animal Welfare Policy.

We expect our supply chain partners to abide by the internationally accepted concept of the Five Freedoms. Under no circumstances will we accept any materials from exotic, threatened, or endangered species as defined by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) agreement and the International Union for Conservation of Nature (IUCN) Red List. Our approach to ensuring this is based on improving traceability from the farm to the final product.

### METHODOLOGY & ASSUMPTIONS

We work hand in hand with other 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.

Our [Animal Welfare Policy](#) describes banned practices and banned materials and lists key third party validation systems that can be applied to substantiate claims.

### 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.](#)

## Progress Update/Actions

In 2024, 29.21% of all animal-derived products have been certified to a third-party standard, including the Responsible Down Standard and Sustainable Fibre Alliance (SFA).

96.61% of the cashmere used in 2024 has been certified to the SFA or is certified recycled.

This means we are very close to our 2028 target for cashmere and continue our efforts to reach our overall 2028 target of sourcing 75% of our core animal-based materials from sources certified according to defined animal welfare standards.

### Updated Animal Welfare Policy

In 2024 we published a strengthened Animal Welfare Policy, incorporating fundamental updates reflecting our rising standards. Recent changes involve the planned phase-out of real leather, down, and feathers as of July 2025. Furthermore, the policy prohibits the use of other animal-derived materials that do not comply with C&A principles for animal welfare or are of insufficient quantity in our material mix to implement sufficient diligence controls.

These updates have been communicated to relevant functions within C&A as well as all our supply chain partners.

# Circularity

enabling reuse, remaking, and recycling, as we work towards fully embedding these principles across our product range.

- Used more: C&A wants to support and develop business models that extend product life such as reuse.

Additionally, we ensure our strategy aligns with the EU Product Environmental Footprint (PEF) technical working group outcomes.

## METHODOLOGY & ASSUMPTIONS

A product counts toward our circular product target if it meets one of the following criteria:

- It integrates recycled materials; minimum percentage must be 20%. In the case of a product which has multiple recycled inputs, it is still only counted once.
- It has a circular design; here we are currently counting the number of products that are Cradle to Cradle Certified®<sup>9</sup>; design for durability and recyclability are not yet accounted for.

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. Embedded 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 Update/Actions

In 2024 we increased the share of products which comply with circularity principles. The quantity of Cradle to Cradle Certified®<sup>1</sup> products doubled compared

to the previous year, which shows significant growth despite the overall limited scale. Large-volume programs within the women's basics area were adapted and certified; adding on to women's denim and jersey products which have already received Cradle to Cradle® certification through continuous collaboration with some of our largest suppliers.

When looking at products that contain a minimum of 20% recycled materials, we were able to increase the overall share to almost one fifth. Nevertheless, we are

not yet on track to meet our target of seven out of ten products by 2028. Achieving this goal will require the integration of further circular design principles, such as design for durability and recyclability. Updating our definition of a circular 'products and embedding recyclability and durability in product creation processes is a key activity planned for 2025.

<sup>1</sup> Cradle to Cradle Certified® is a globally recognized standard for products that are designed and manufactured following principles of material health, product circularity, renewable energy, water stewardship, and social fairness.

## Circular Product Target

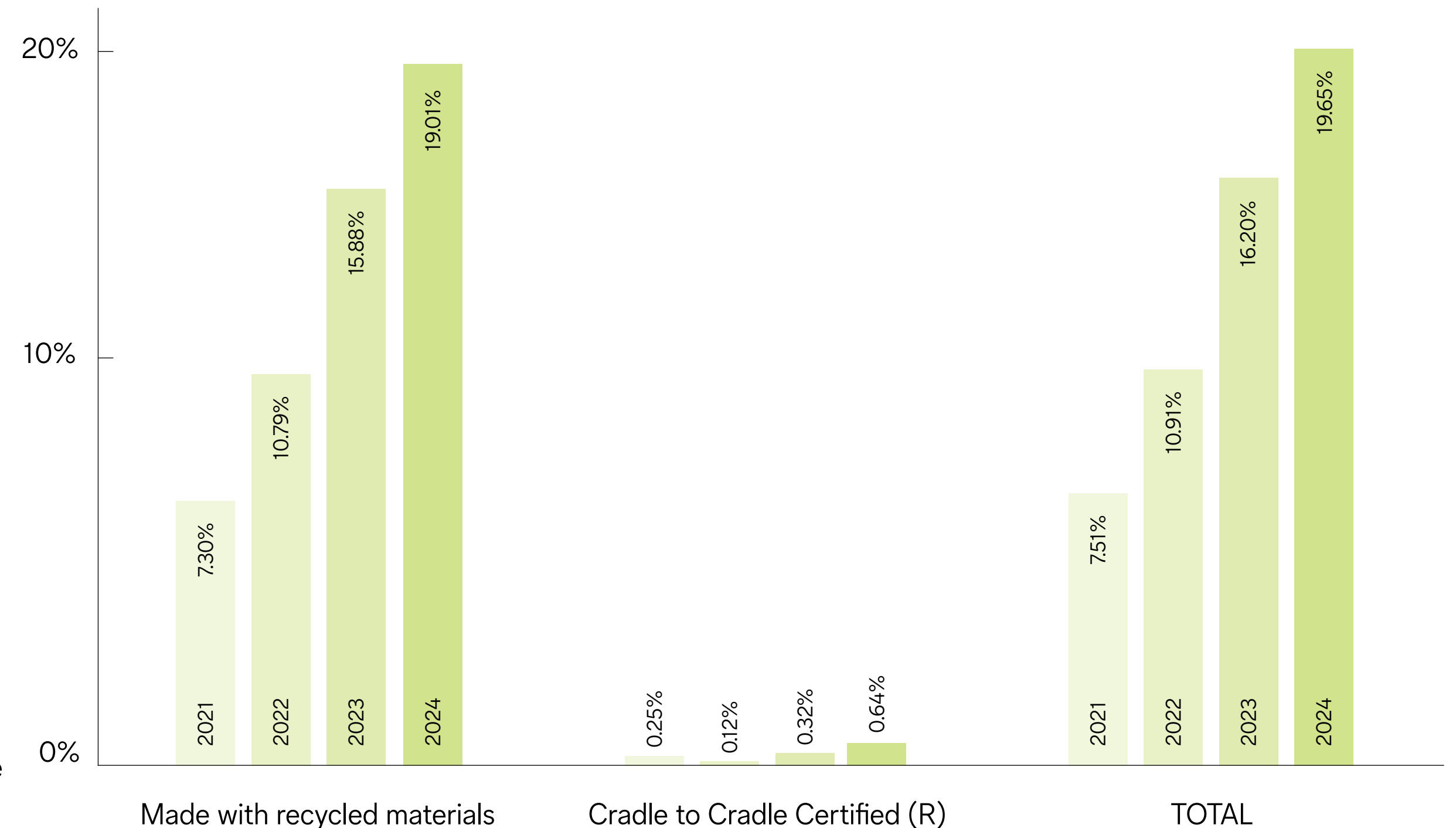
Our goal is for seven out of ten products to comply with circularity principles by 2028. Our strategy is based on integrating recycled materials into our products, adapting the design of our products to a circular economy, and testing and scaling viable circular business models. Here we consider the 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 we try to keep the products in use for as long as possible.

### OUR APPROACH

C&A's circularity approach relies on pursuing the three principles of a circular economy of fashion defined by the Ellen MacArthur Foundation:

- 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.
- Made to be made again: C&A products are designed and manufactured with the goal of

## Share of circular products



## Cradle to Cradle Certified® Partnership

The Cradle to Cradle Certified® philosophy is built on the principle that waste can be eliminated by designing products so their materials and components can be repurposed or recycled indefinitely, enabling true circularity and reducing environmental impacts. This design approach is supported by the Cradle to Cradle Certified® sustainability certification system, which verifies that products meet rigorous criteria for material health, circularity, renewable energy use, water stewardship, and social fairness.

At C&A, we have been introducing Cradle to Cradle Certified® products since 2017. We use the Cradle to Cradle Certified® standard as a key framework to measure circularity and advance toward our circular product targets, while providing credible substantiation for related sustainability claims.

During 2024, our focus was on onboarding selected supply chain partners to the new Cradle to Cradle Certified® Version 4.1 standard. We are proud to offer many of our timeless essentials as Cradle to Cradle Certified®, helping our customers feel confident when choosing products that support circularity and responsible sourcing, while maintaining price accessibility for all.

### PRODUCT DURABILITY

As is the case with circularity, at the moment there is no alignment regarding durability standards in the fashion and textile industry. Therefore, we are supporting the development of the Product Environmental Footprint

(PEF), a framework for measuring the environmental impact of products based on a Life Cycle Analysis methodology. C&A has been a voting member of the PEF Technical Secretariat since 2018. We also support the PEF by participating in working groups to refine the current methodology for apparel and footwear, particularly related to physical durability and non-physical durability. We were also part of the PEF Category Rules (PEFCR) supporting studies, with the objective of understanding current barriers and levers to implementation of the PEF.

### DURABILITY STUDY

During the fall of 2024 we conducted a study to understand customers' expectations for a garment's durability, including detailed differentiation among product groups.

Nearly 1,200 C&A women's collection customers between the ages of 25 and 55 located in Germany, Poland, and Spain, were engaged through a survey. The intention was to understand customers' garment care behaviors and durability expectations and translate these into key insights and recommendations.

Through this study we learned which items our consumers expect to last longest and how they measure longevity in different product types. We also gained insight into the behavior patterns of consumers and how those behaviors can impact different garment groups. We will use this data to set up internal durability metrics to make our products more durable, matching our consumers' preferences.

### PRODUCT REPAIRABILITY

For clothing, product reparability relies on the engagement of consumers and its measurability is therefore greatly limited. Where applicable, spare parts are provided to consumers (for example, spare buttons) to enable repairs.

### SUPPORT FOR EMERGING LEGISLATION

From a regulatory standpoint, we welcome the upcoming proposal for a new Ecodesign for Sustainable Products Regulations (ESPR) specific to textiles. It will provide much needed guidance to environmentally sustainable and circular products and encourage harmonized approaches to circularity across Europe. The ESPR will heavily influence our strategy once published.

# Waste

In 2024, we established a working group to improve waste data governance and reporting. Our goal with this project is to clarify and improve our waste data collection and monitoring procedures for all the waste streams for which we are responsible. This will help us set a more accurate baseline, develop a suitable target, and increase steady progress towards our goals.

Currently, we are prioritizing plastic waste – an area where our operational oversight is most developed. It is also a domain where urgent action is required across the industry.

## Plastic Elimination Target

In 2019, we set an ambitious target to eliminate 100% of virgin plastic from our stores, e-commerce packaging, and transport packaging by 2028. This target is supported by clear, actionable annual plans focused on practical and impactful solutions.

Our approach prioritizes avoiding unnecessary virgin plastic and follows a structured hierarchy:

1. **Avoid/Reduce:** Minimizing plastic use wherever possible by removing non-essential packaging.
2. **Reuse:** Promoting reusable alternatives to single-use plastics.
3. **Replace:** Substituting unavoidable virgin plastics with recycled or other sustainable non-fossil fuel-based materials.

To drive progress, we regularly measure and report on plastic use, maintain a plastics elimination roadmap with defined actions and milestones, and assign dedicated teams responsible for executing the plan.

The scope of this target covers key virgin plastic sources identified in our operations:

- In stores: hooks, display polybags, size tapes, and strings.
- E-commerce packaging: polybags and shipping bags.
- Distribution and transport packaging.

## Progress Update/Actions

We continued our commitment to reducing single use plastic usage across our operations, working toward our 2028 goal to eliminate key virgin plastics. We have achieved an overall reduction of 56% versus the 2019 baseline, from 1,840 metric tons to 813 metric tons of virgin plastic used in the financial year 2024.

Based on available data significant achievements were made in reducing in-store packaging. Plastic size strings were fully eliminated, while virgin plastic volumes in size tapes and virgin plastic polybags etc have both reduced by 88% compared to 2019.

E-commerce has seen considerable improvements also, where we have reduced virgin plastic in polybags by 91% compared to 2019 volumes.

Hooks are the third largest plastic item category and virgin plastic use decreased by 49%.

However, further work is needed on certain high-volume virgin plastics, in particular our transport packaging. This represented 53% of the in-scope plastic in 2019. As of 2024 volumes have decreased by 32%.

## Other Waste Related Actions

Regarding other monitored waste (that extends beyond plastic), we have made efforts to reduce waste where possible and increase reuse and recycling where reduction is not possible. Some reporting mechanisms have changed slightly this year for accuracy, preventing us from going back further than 2023 to compare our performances.

With regards to packaging waste, we have managed to reduce our plastic packaging by 18% in 2024 compared to 2023. Our overall monitored packaging waste stayed roughly the same (due to cardboard boxes increasing). In-store waste from hangers decreased by 4% in 2024 compared to 2023. In 2024, total volumes of packaging and in-store waste that was reused decreased by 8% due to hangers, though they only decreased by 3% if relative to quantities of recuperated hangers. On the other hand, recycling increased by 2% compared to 2023.

Specific to textile waste, improved forecasts for our purchasing and merchandising operations enabled a reduction in unsold merchandise of 32%, down to 455 metric tons. This result reflects encouraging progress in upstream waste prevention, as we continue working to address some of the apparel industry's persistent environmental challenges at their source.

We have also recuperated more textiles waste from consumers through our We Take It Back program (permitting consumers to bring back used textiles to stores, or send it back online), collecting 5% more used textiles in 2024 compared to the previous year. Our We Take It Back program improved end of life management of the textiles in 2024; reuse increased by 7%, recycling by 51%, energy recovery by 4%, and items going to unknown end users were eliminated altogether. Proportionally, in 2024, 66% of recuperated items through the We Take It Back program went to reuse, 29% to recycling, and 5% to thermal recovery.

## Volume of Monitored Non-Hazardous Waste (Own Operations)

		MONITORED WASTE STREAMS <sup>1</sup>	2023 (METRIC TONS) <sup>2</sup>	2024 (METRIC TONS)	2023 TO 2024 CHANGE (%)
Plastic Elimination Target Scope	MONITORED PACKAGING WASTE				
	Plastic Packaging		1,240	1,013	-18%
	Store: hooks, display polybags, size tapes, and strings		136	102	-25%
	E-Commerce: polybags and shipping bags		417	246	-41%
	Distribution and transport plastic packaging		687	665	-3%
	Cardboard boxes		9,033	9,262	+3%
	TOTAL WEIGHT OF MONITORED PACKAGING WASTE (1)		10,273	10,275	0%
	MONITORED IN-STORE WASTE				
	Hangers		4,758	4,551	-4%
	TOTAL WEIGHT OF MONITORED IN-STORE WASTE (2)		4,758	4,551	-4%
MONITORED TEXTILES WASTE					
We Take it Back Program		969	1,015	+5%	
Unsold merchandise and customer returns returned to DCs		667	455	-32%	
TOTAL MONITORED TEXTILE WASTE (3)		1,636	1,470	-10%	
TOTAL MONITORED VOLUME NON-HAZARDOUS WASTE (1+2+3)		16,666	16,296	-2%	
KNOWN PACKAGING AND IN-STORE WASTE DIVERTED FROM DISPOSAL					
<b>Reuse</b>		3,104	2,842	-8%	
Hangers		3,104	2,842	-8%	
<b>Recycling</b>		11,373	11,636	+2%	
Plastic in distribution and transport		687	665	-3%	
Cardboard		9,033	9,262	+3%	
Hangers		1,653	1,709	+3%	

<sup>1</sup> This table presents waste stream information for 2023 and 2024 using the most reliable data accessible to us. Most figures are organized by Financial Year; however, in some cases, alternate time frames such as the calendar year were necessary. Each individual waste stream uses the same reporting period throughout. While every effort has been made to ensure accuracy, some small discrepancies may remain due to limitations in available data or reporting methods.

<sup>2</sup> To improve accuracy, the 2023 data have been recalculated using enhanced methodologies. Because of these changes, comparable recalculated data is not available for years prior to 2023.

## Volume of Monitored Non-Hazardous Waste (Own Operations)

MONITORED WASTE STREAMS <sup>1</sup>	2023 (METRIC TONS) <sup>2</sup>	2024 (METRIC TONS)	2023 TO 2024 CHANGE (%)
<b>MONITORED TEXTILE WASTE FOR WE TAKE IT BACK PROGRAM</b>			
Reuse	622	667	+7%
Recycling	193	292	+51%
Energy recovery	54	56	+4%
Others <sup>3</sup>	100	0	-100%
<b>We Take it Back program</b>	969	1,015	+5%
<b>TOTAL MONITORED VOLUME NON-HAZARDOUS WASTE DIVERTED FROM DISPOSAL (PACKAGING AND TEXTILES)</b>			
Reuse	3,726	3,509	-6%
Recycling	11,566	11,929	+3%
Energy recovery operations	54	56	4%

<sup>3</sup> A portion of the waste data could not be disclosed due to limitations in the information provided by our service provider.

# 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 are described here. Throughout these various subsections, there are multiple references to our Human Rights & Equity Policy. 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 will be presented in multiple sections but from differing perspectives.



# S1 Own Workforce

Our 2023 double materiality assessment (DMA) was preceded by a thorough human rights risk analysis focusing on our own workforce. The process then enabled us to identify and understand the potential impacts, risks, and opportunities (IROs) related to our own workforce in Europe.

We have ensured a robust approach by leveraging authoritative indices and reports on human and labor rights, supplemented by internal insights and feedback from independent civil society experts.



# Impacts, Risks, and Opportunities (IROs)

By proactively addressing health and safety issues and systemic challenges to inclusion, we aim to reduce risks such as workplace injuries, bias in performance management, and unequal access to opportunity, and we can also enhance employee satisfaction, and attracting and retaining skilled workers of all backgrounds and identities. This work can differentiate our company as a safe and truly inclusive workplace and an employer of choice that is dedicated to equity.

S1 OWN WORKFORCE				
IRO DESCRIPTION	IRO TYPE	TIME HORIZON	VALUE CHAIN	MATERIAL TOPIC
Physical health and safety incidents	Negative impact	Long	Own operations, logistics	Health and safety
Unequal treatment in employment	Negative impact	Long	Own operations, logistics	Gender equality and equal pay
Harassment at workplace	Negative impact	Long	Own operations, logistics	Harassment
Create inclusive work environment	Negative impact	Long	Own operations, logistics	Diversity and equal treatment
Own workforce related operational risks	Financial risk	Long	Own operations, logistics	Diversity and equal treatment

## Scope

All C&A employees and non-employees in our workforce whose work or well-being may be affected by our activities were included in the materiality assessment. This covers office staff, store and district management and staff, retail sales assistants (permanent and temporary), subcontracted workers, trainees, warehouse and logistics personnel, transport workers, and sourcing teams. For full disclosure, please refer to FY2023 Sustainability Report.

## Higher-Risk Groups

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. This includes temporary and subcontracted workers, trainees, logistics workers, women and people belonging to historically marginalized communities.

## Impacts and Risks

Addressing workforce-related risks is essential for C&A's long-term success and resilience. Key systemic challenges in retail and distribution include lower wages for entry-level positions, health and safety risks from demanding work environments, and risks of discrimination and harassment – often amplified by workforce diversity and temporary contracts. These issues, together with extended working hours and poor work-life balance, can lead to high turnover, low morale, and operational inefficiencies, as well as legal, financial, and reputational risks. While such risks have not broadly materialized at C&A, we proactively prevent them through targeted actions like anti-discrimination

and safety training and regular salary reviews. Isolated incidents concerning working hours, health and safety, and harassment were reported this year and are addressed in later sections.

We remain committed to continuously monitoring and mitigating risks to promote a fair and inclusive workplace environment, aligned with our dedication to fostering a future where no one is left behind.

## Opportunities

Creating a supportive and equitable work environment at C&A is essential to enhancing employee well-being and fostering a culture of respect, fairness, and inclusion within safe workplaces. Key initiatives include:

- **Improving working hours and work-life balance:** We regularly review scheduling practices and engage with outsourced employees, particularly during peak seasons. We also provide well-being resources such as coaching and counseling through our collaboration with OpenUp and capacity-building opportunities via the C&A Academy. These resources are available to employees based in our EU hub offices and others with C&A Academy access.
- **Enhanced health and safety measures:** Each C&A country organization assigns responsible staff, such as health and safety officers or committees, to oversee inspections and monitor occupational health and safety. Role-specific training equips employees with the essential knowledge and skills to maintain safe working environments.
- **Livelihood support through salary reviews:** Annual salary reviews occur at country level, encompassing

budgeting for structural and merit-based increases. When applicable, collective bargaining agreements also contribute to fair compensation. These processes aim to support financial stability for C&A employees globally.

- **Strong anti-discrimination and anti-harassment policies:** We promote equitable treatment through robust policies designed to prevent and address discrimination and harassment. Decisive actions are taken when incidents arise, supporting employees across all genders and identities to thrive and reach their potential.
- **As work roles evolve with changing patterns and technology,** employees will have opportunities to develop skills critical for the future, aiding career progression. Our commitment to environmental goals will also foster new roles in sustainability management, compliance, and innovation.



# Strategy

Our strategy is based around implementing the key policies described below and maintaining a robust management system for monitoring our progress and minimizing negative impacts. Our commitment to upholding the rights of those in our community is evident in how we administer our Fairness Channel (detailed in the coming sections), and how we prioritize transparency. 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.



## Policies

### Human Rights & Equity Policy

At C&A, we outline our fundamental commitments to our workforce within a comprehensive Human Rights & 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 & 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.

Additional policy details are available in section G1 on [page 86](#).

The Human Rights & 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 Leadership Team (LT).

The LT is responsible for considering potential human rights impacts related to business decisions.

### Alignment with Relevant Third-Party Standards

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

We attach particular importance to respecting the rights of children, women, and people belonging to historically marginalized groups.

In this, we are guided by the international rights standards, outlined, among others, by the following conventions:

- The UN Convention on the Rights of the Child
- The UN Convention on the Elimination of Discrimination against Women

- The ILO Violence and Harassment Convention (No. 190)
- The International Convention on the Elimination of All Forms of Racial Discrimination
- The Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families
- The Convention Relating to the Status of Refugees
- The International Convention on the Rights of Persons with Disabilities
- The Children’s Rights and Business Principles
- The UN Women’s Empowerment Principles
- The Gender Guidance to the UNGPs
- The UN Standards of Conduct for Tackling Discrimination against LGBTQI people

We comply with national laws wherever we operate and apply international human rights standards when they offer stronger protections. Where local regulations limit their application, we seek practical ways to uphold those standards in line with our [Human Rights & Equity Policy](#).

## Risk Management

We commit to honoring human rights and promoting a culture that respects human rights by implementing and maintaining a robust human rights risk management system. This system aims to mitigate risks and negative impacts on people and communities throughout our own operations, business relationships, and supply chain. What this means is specified below:

We have embedded rights-based approaches into internal policies, operational processes, and business practices.

We raise human rights awareness through trainings, e-learnings, and communication campaigns.

We have implemented effective due diligence processes to identify, prevent, mitigate, and, where necessary, remediate negative impacts on people affected by our business.

We maintain and continuously enhance accessible and effective grievance opportunities, such as C&A's Fairness Channel, which are open for C&A employees, as well as other internal and external stakeholders, including suppliers/business partners and their workers, and any third parties (see details on internally and externally run grievance mechanisms on [page 75](#)).

Human rights violations and abuses, including but not limited to inadequate labor standards, can be reported through our Fairness Channel.

We are committed to taking timely actions to investigate human rights complaints and, where necessary, cease, or at least mitigate, adverse impacts on people. These actions will include non-judicial remedies, such as arranging corrective actions, compensation for grievances, and disciplinary measures against responsible people.

We monitor implementation and results of the remediation measures, as well as communicating how impacts are addressed in the long-term. With a view to prevent negative human rights impacts from reoccurring, we will regularly update relevant corrective measures in both our policies and in practice.

Respecting the right to defend human rights, we do not retaliate or tolerate any form of retaliation against

anyone who, in good faith, raises human rights concerns or helps the investigation into human rights complaints.

## C&A Code of Ethics and Conduct

Our Human Rights & Equity Policy is anchored by a rigorous Code of Ethics and Conduct (the “Code”), 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 each another and navigate issues that may impact society, both directly and indirectly. Additional details are available under “Corporate Culture” on [page 86](#)

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 FY2023 (January 2024) and has been rolled out to all employees through a communication campaign featuring members of the Leadership Team, extending into FY2024 (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.

## Specific Provisions by Topic

### Forced Labor and Labor Exploitation

We prohibit all forms of forced or involuntary labor, including bonded, imprisoned, trafficked, or indentured labor. All work must be voluntary and free from coercion.

We pay close attention to recruitment practices, ensuring no fees are charged and workers retain control of their identity documents.

Employees must be hired under legal contracts, provided with safe working and living conditions, fair pay, and adequate rest.

### Children’s Rights

We do not tolerate child labor. Children under 16 are not employed in regular roles. Participation is only permitted through formal apprenticeship or vocational programs.

We follow the highest applicable standards and take steps to protect children’s rights in our operations, including those of employees’ children and in our product environments.

### Health and Safety

Safe working conditions are a fundamental right. We take preventive measures against illness and injury and provide regular training.

Employees may walk off the job in case of imminent danger. We also ensure customer safety through compliance with health standards.

## Equity, Inclusion, and Non-Discrimination

We uphold equal treatment as defined by ILO Conventions. Recruitment and advancement are based solely on merit.

We do not tolerate discrimination on any grounds and support affirmative action where legally permitted.

We commit to pay equity and removing barriers for historically marginalized groups.

To find out more, read the Human Rights and Equity policy at: <https://www.c-and-a.com/corporate/en/about-us/equity-inclusion-human-rights>

## A Culture of Listening: How the Fairness Channel Is Supporting a Fairer Workplace

Launched as a reporting and compliance mechanism, the new Fairness Channel was designed to signal – both internally and externally – that C&A is committed to living its values. One year on, it has evolved into a trusted space where individuals across our business and supply chain feel safe to speak up – and many do.

From factory workers in Southeast Asia to distribution center teams in Eastern Europe, and head offices in Düsseldorf and Brussels, concerns are raised, analyzed, and addressed. The mechanism's success lies not only in the volume of reports – proportionate to our company's scale and reach – but in the trust it fosters and the ongoing dialogue it enables around dignity and accountability.

Substantiated cases have included workplace behavior issues, concerns about customer interactions in stores, and allegations of health and safety violations in the supply chain. Each case has been handled with care, confidentiality, and a commitment to remedy. Where required, cases are reported in anonymized form, in line with our formal compliance obligations. The fact that people across our ecosystem use the channel is a testament to trust.

We remain committed to maintaining and continuously improving the Fairness Channel, because organizational fairness matters to us and our stakeholders.

*Incoming reports are evidence that our processes and culture are strengthening to the benefit of our people thanks to the courage of individuals who speak up, raise concerns, and help us uphold fairness.*

## The Fairness Channel (Grievance Mechanism)

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 a transparent, confidential, and responsive grievance mechanism to allow stakeholders to report human rights concerns easily.

This channel allows individuals to report violations of human rights, environmental protection issues, corruption, fraud, and 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.

Read more about the Fairness Channel and how complaints are handled on [page 91](#).

The Fairness Channel is available on the corporate website. Additionally, posters in stores use a QR code to easily direct people to the platform.

## Engagement with our Own Workforce

It is our central concern to ensure an open dialogue with our employees and actively engage with them by holding regular meetings with our employee representatives and learning from engagement and pulse surveys, focus groups, and grievance channels.

This engagement with our employees, co-workers, and their representatives helps to shape company decisions and activities and to manage actual and potential impacts concerning our workforce.

The perspectives of all workers are important, including women and groups that are particularly vulnerable or marginalized. While we have taken the first steps in these areas, we recognize the need for further action 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 Workers' Council representatives, surveys, and focus groups.
- On an ad-hoc basis, during specific projects or changes affecting the workforce.
- Continuously, via accessible grievance channels.

The Social Relations and Employment Law Department of the People and Culture Division is responsible for liaising with the EWC (European Works Council) and other social partners, ensuring an open and constructive dialogue with workers' representatives. The Equity, Inclusion, and Human Rights Department promotes the inclusion of underrepresented groups' concerns and needs in business and HR considerations and fosters respect for human rights.



# Progress Update/Actions

Our commitment to positive action is described in our 2028 Equity, Inclusion & Human Rights Strategy ([Equity Strategy](#)), and further translated into annual action plans.



In FY2024, C&A took meaningful steps to foster a respectful and inclusive environment for both employees and customers. Our focus was on creating spaces where everyone feels safe, valued, and treated fairly. To support this, we introduced tailored inclusion training for marketing and communication teams and offered racism awareness education to retail and logistics colleagues, helping to build shared understanding and empathy across our stores and distribution centers. Over 1,250 leaders participated in racism awareness sessions alongside their teams,

with more than an 85% completion rate. Many also chose to reaffirm their commitment to respectful workplace behaviors by endorsing a shared statement of values. Additionally, more than 250 marketing and communications colleagues completed inclusion training, achieving a participation rate of over 90%.

On the International Day Against Racial Discrimination, C&A invited civil society representatives and academics to engage in open dialogue with senior leadership and co-workers, addressing how conscious

and unconscious bias can shape consumer experiences and workplace dynamics. These conversations helped surface lived experiences, challenge assumptions, and reinforce our commitment to equity as a shared responsibility.

To complement these efforts, we also strengthened safeguards to prevent profiling and third-party harassment, ensuring that all customers are welcomed with dignity. Recognizing the importance of listening and responding effectively, we enhanced the Fairness Channel through regular outreach and training for investigation teams. These improvements were guided by international best practices, including the UN Guiding Principles on Business and Human Rights, and focused on fairness, transparency, and equitable resolution, particularly in cases involving investigation of discrimination and harassment in the workplace. Our aim is to ensure that when concerns are raised, they are handled with care, and that our workplace continues to evolve as a place where everyone can thrive.

This year, we highlighted our commitment to gender equity through a series of initiatives that engaged employees across markets. Anchored in the theme “Invest in Women: Accelerate Progress,” our International Women’s Day 2024 campaign celebrated women’s achievements and called for collective action to dismantle outdated gender norms. Through the “Champions of Change” panel, we deepened our ongoing dialogue with employees about allyship across differences, turning our attention to the role of men in advancing gender equity at C&A and beyond. Spotlighting the role of men as allies to women of all identities, we emphasized that gender equity is not a

women’s issue - it’s a shared responsibility. Hundreds of participants joined the conversation, exploring how inclusive leadership, mentorships and sponsorships, active listening, and cultural sensitivity can drive meaningful change. We also honored everyday women-role models nominated by their C&A colleagues, showcasing the resilience and leadership of women across our stores and offices. Our collaboration with social enterprise Rangsutra brought this commitment to life through a capsule collection of hand-embroidered pieces, reinforcing our belief in fashion can be a force for good. These efforts, alongside continued support for organizations combating gender-based violence, reflect our commitment to a workplace and a society where equity is practiced.

In the spirit of building a truly inclusive environment, C&A also marked the International Day Against Homophobia, Biphobia, Intersexphobia, and Transphobia (IDAHOBIT) by continuing education for co-workers on supporting the LGBTI+ community in our ongoing pursuit of equal rights and fair treatment for people of all sexual orientations, gender identities, gender expressions, and sex characteristics.

## Breast Cancer Awareness

Extending our equity lens to health inclusion, C&A advanced breast cancer awareness through product innovation, community engagement, and internal education. We relaunched our post-mastectomy bra in two modern styles, honoring the strength of women living with or after breast cancer and promoting regular self-examination. Across Europe, we hosted intimate styling sessions for individuals affected by breast cancer, offering personalized advice to support comfort and confidence. Store co-workers received guidance on how to assist customers with sensitivity, including tips on inclusive language, privacy, and product recommendations tailored to individual treatment needs. Managers were guided to offer flexible support, while peers were encouraged to show compassion without assumptions. The initiative raised awareness about systemic barriers to early detection and care, highlighting how socio-economic background, gender identity, and stigma shape unequal health outcomes. The campaign also promoted self-examination and shared resources for early detection, reinforcing that dignity, care, and equity must guide our collective response to breast cancer, as well as to other health conditions and public health challenges that affect our communities.

## Community Impact Program

The C&A Community Impact program, launched in 2022 with grant support from the COFRA Foundation, enables employees to nominate causes they care about for funding support. Broadly, this has focused on supporting the integration and upward mobility of underrepresented groups, particularly young people facing socio-economic disadvantage and women affected by domestic violence. In 2024, we received 48 nominations from employees, resulting in 34 grant applications: all of which were approved.

Among the supported initiatives were 19 projects aimed at empowering youth facing multiple disadvantages, alongside four humanitarian projects, including responses to devastating floods in Bangladesh and the ongoing war in Ukraine. These outcomes reflect the power of employee-led engagement and the role of volunteerism in advancing equity in society, showing how coworkers can directly shape our social impact by connecting local needs with global solidarity.



## Incidents in Our Workforce

During FY2024, C&A received a total of 116 complaints through our grievance mechanisms, with 61 specifically alleging human rights concerns. 20 complaints were substantiated as involving probable discrimination or harassment, and appropriate remedial actions were taken to uphold workplace standards. No severe human rights issues impacted our workforce during the year. C&A remains committed to continuous monitoring, prevention, and remediation to maintain a safe, respectful, and equitable workplace.

# Our Workforce in Numbers

## Gender Split

GENDER	HEADCOUNT
Women	21,255
Men	3,181
Non-binary or undisclosed gender	10
<b>TOTAL</b>	<b>24,446</b>

## Total Number of Employees

<b>TOTAL HEADCOUNT</b>	<b>24,446</b>
------------------------	---------------

## Number of Employees per Country

COUNTRY	HEADCOUNT
Germany (DE)	11,920
Netherlands (NL)	2,134
France (FR)	1,583
Belgium (BE)	1,150
Spain (ES)	1,385
Austria (AT)	1,115
Switzerland (CH)	1,151
Poland (PL)	630
Slovakia (SK)	511
Czech Republic (CZ)	511
Portugal (PT)	374
Romania (RO)	437
Hungary (HU)	325
Croatia (HR)	256
Slovenia (SI)	119
Italy (IT)	122
Luxembourg (LU)	93
Bangladesh (BD)	98
P.R. China (CN)	83
Hong Kong (HK)	27
India (IN)	22
Tokelau (TK)	18
Cambodia (KH)	8
Vietnam (VN)	7
Pakistan (PK)	7
<b>TOTAL</b>	<b>24,446</b>

## Number of Employees (Headcount or Full-Time Equivalent)

Total Headcount	24,446
Total FTE	15,907

## Gender Split by Region - Headcount<sup>1</sup>

REGION	WOMEN	MEN	NON-BINARY OR UNDISCLOSED GENDER	TOTAL
NWE	13,491	2,161	5	15,657
CEE	4,604	446	5	5,055
SE	3,026	438	0	3,464
Asia	134	136	0	270
Total	21,255	3,181	10	24,446

## Number of Full-Time Employees by Headcount by Region - Full Time Headcount

REGION	WOMEN	MEN	NON-BINARY OR UNDISCLOSED GENDER	TOTAL
NWE	2,828	1,177	1	4,006
CEE	1,924	296	4	2,224
SE	1,024	258	0	1,282
Asia	134	136	0	270
Total	5,910	1,867	5	7,782

## Number of Part - Time Employees by Headcount by Region - Part Time Headcount

REGION	WOMEN	MEN	NON-BINARY OR UNDISCLOSED GENDER	TOTAL
NWE	10,663	984	4	11,651
CEE	2,680	150	1	2,831
SE	2,002	180	0	2,182
Total	15,345	1,314	5	16,664

<sup>1</sup> These are the latest regional divisions, replacing the previous categories no longer in use at C&A.

NWE North-Western Europe; includes Germany, Netherlands, and Belgium.

CEE Central-Eastern Europe; includes Austria, Switzerland, Poland, Hungary, Slovakia, Croatia, Czech Republic, Romania, and Slovenia.

SE Southern Europe; includes France, Spain, Portugal, Footnote below first table: Top management reporting directly to the CEO, and Italy

## Gender Distribution of Top Management

	WOMEN HEADCOUNT	WOMEN %	MEN HEADCOUNT	MEN %
Gender distribution top management	3	75%	1	25%

Top management reporting directly to the CEO

## Age Distribution

AGE DISTRIBUTION	HEADCOUNT	%
Employees under 30 years old	8,306	34%
Employees 30 to 50 years old	8,584	35%
Employees over 50 years old	7,556	31%
Total	24,446	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



# S2 Workers in the Value Chain

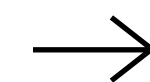
We recognize that workers in our value chain may encounter risks or adverse conditions due to a range of systemic factors, including local socio-economic, legal, and political contexts. We address these topics through a human rights management system covering policies, established approaches to engage with affected stakeholders, processes to remediate negative impacts (including grievance channels), and action plans as detailed below.



# Impacts, Risks, and Opportunities (IROs)

Systemic challenges in the apparel sector can potentially lead to negative impacts for workers in our upstream value chain. The policies and processes we have established, along with our collaboration with stakeholders, and the local presence of our sustainability staff in production countries all aim to prevent and, where necessary, remediate any negative impacts.

The following issues are material topics for our business in relation to our value chain:



S2 WORKERS IN THE VALUE CHAIN				
IRO DESCRIPTION	IRO TYPE	TIME HORIZON	VALUE CHAIN	MATERIAL TOPIC
Occupational health and safety incidents	Negative impact	Long	Upstream, logistics	Health and safety
Violations of rights of freedom of association and collective bargaining	Negative impact	Long	Upstream, logistics	Freedom of association, Collective bargaining
Excessive working hours	Negative impact	Long	Upstream, logistics	Working time
Inadequate wages	Negative impact	Long	Upstream, logistics	Adequate wages
Equal treatment and opportunities	Negative impact	Long	Upstream	Equality and equal pay
Harassment at work-place	Negative impact	Long	Upstream	Measures against violence & harassment
Child labor	Negative impact	Long	Upstream	Child labor
Forced labor	Negative impact	Long	Upstream, logistics	Forced labor
Human rights related operational & compliance risks	Financial risk	Long	Upstream	Human rights related material topics

## Scope

C&A's policies, processes, and actions relate to workers employed by independent entities in our upstream value chain, such as the factories and production facilities that manufacture C&A's products.

## Higher Risk Groups

In some cases, particular groups of workers or certain geographies present specific concerns.

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

In India, multiple factors may coalesce to create a heightened risk of forced labor, such as young, women-migrant workers, housing for workers on suppliers' premises, employment as contract labor, and excessive overtime.

We also recognize there is an additional potential risk of child labor in deeper supply chain tiers in Bangladesh, Turkey, India, and Pakistan, including in cotton production.

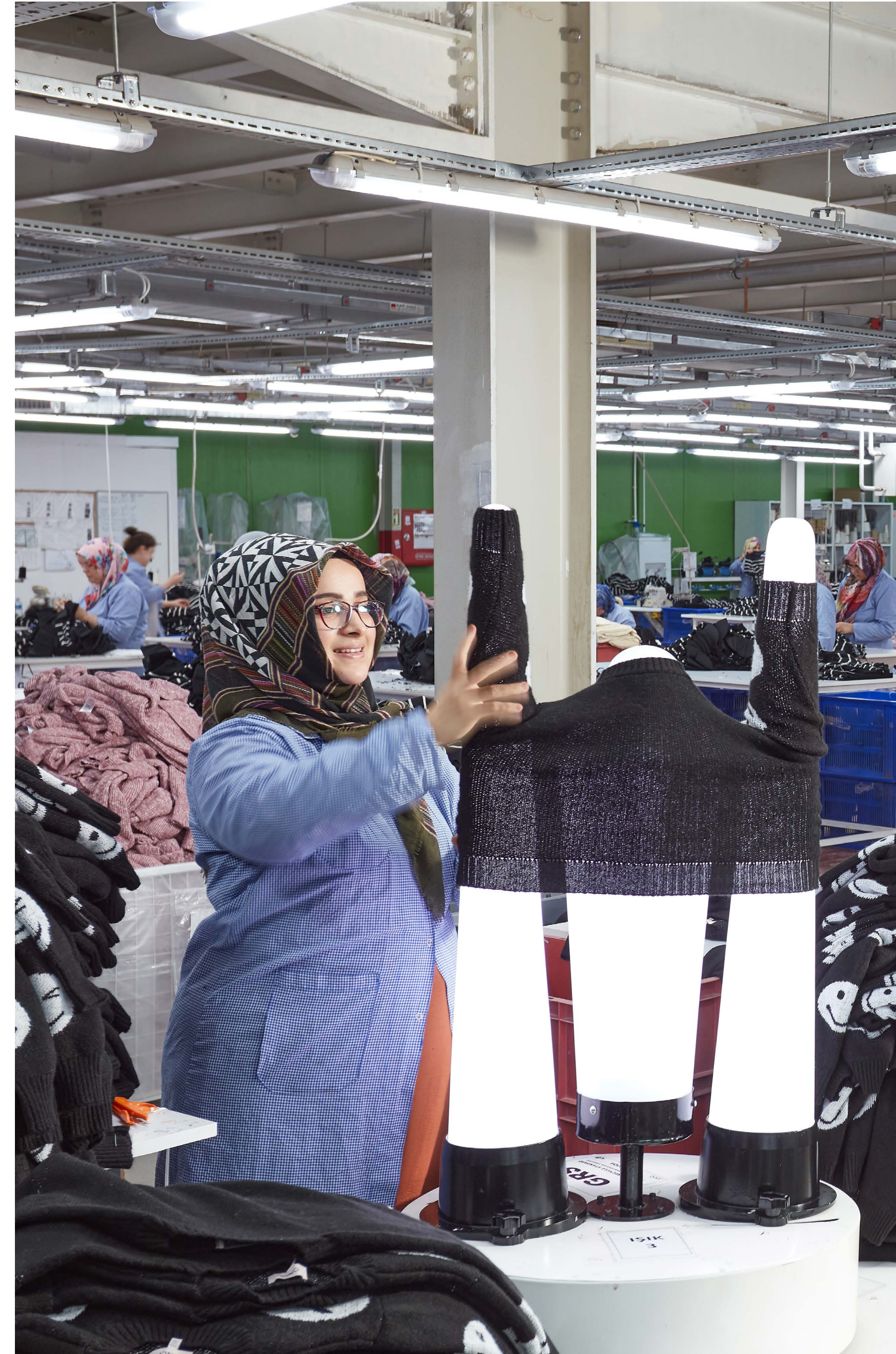
## Systemic Challenges

We consider gender-based violence and harassment a hidden, possibly widespread systemic potential negative impact in our supply chain, which is largely related to young women supervised by men in hierarchical structures in environments often permissive of gender-based misconduct.

In addition, we recognize that prevailing wage levels in the garment sector in the production countries often fall short of fully enabling a decent standard of living, and addressing this will require collective multi-stakeholder efforts.

Overtime, including excessive overtime, is a systemic issue in the garment sector which relates to low regular wage levels.

Environmental challenges linked to apparel manufacturing can also impact workers in the value chain. Textile production significantly contributes to greenhouse gas emissions and climate change through energy-intensive processes, and climate change threatens natural systems, societal wellbeing, and business continuity. Chemical use in manufacturing and cotton farming can contaminate water and soil, damaging ecosystems, food resources, and human health.



# Strategy

Addressing these risks requires maintaining reliable, long-term supplier relationships. This helps to improve working conditions, reduce disruptions, ensure that no sanctioned entities or individuals are part of our business relationships, and strengthen stakeholder trust. Our strategy builds upon developing these relationships alongside the implementation of our policies, described below, and our robust risk assessment process, along with stakeholder dialogue to ensure that all voices are heard.

## Policies

### HUMAN RIGHTS, AND EQUITY POLICY

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 to people working in our supply chain, in alignment with international standards. This includes the commitment to continuously implement a human rights management system. Our human rights management system encompasses due diligence processes for:

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

Additional policy details "Corporate Culture" on [page 86](#).

A specific Human Rights Governance Council, including senior management representatives, is tasked with overseeing and monitoring the implementation of these due diligence processes. The Human Rights Declaration published during the reporting period summarizes the key processes of C&A's human rights management system as well as the prioritized risks and key measures for their mitigation.

### RISK MANAGEMENT

We understand human rights risk management to be a continuous and dynamic process. As we have committed within our Human Rights & Equity Policy, human rights risk management is integrated into all relevant departments of the business. This includes regular annual risk assessments and a commitment to conduct ad hoc risk analyses when entering new upstream markets or when other specific incidents require our heightened, systematic attention due to their potential impact on human rights in our value chain.

The process for the annual risk assessment involves looking at internationally recognized indices and reports and reviewing assessment results of suppliers as well as results of investigations following complaints and reports received through the Fairness Channel or other

channels. Our annual risk analysis also takes note if severe incidents reoccur at production units that had similar issues previously.

Broadly, our annual risk analysis ascertains whether our approaches need adjustment to address emerging issues. More specifically, the process also identifies production units requiring additional support to remediate severe incidents.

### C&A CODE OF CONDUCT FOR SUPPLIERS

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.

Additional policy details are available under "Corporate Culture" on [page 86](#).

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 upstream merchandise

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, washing (including laundry), dry processing, garment dyeing, panel knitting, linking, and final assembly and packing. All suppliers of merchandise provide contractual assurance 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 with reference to ILO/ Better Work as an expert organization for labor 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 signed and acknowledged 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.

## ADDITIONAL RELEVANT POLICIES

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

- Forced Labor 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 merchandise suppliers must sign the Forced Labor Policy.
- Undisclosed Production Rules, specifying the set of consequences for upstream merchandise 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, which 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 direct upstream supplier of merchandise does not entail negative impacts for workers.
- Terms and Conditions for the Supply of Merchandise, specifying the contractual conditions for all direct upstream 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.

See additional details on these policies starting on [page 86](#).

## SPECIFIC POLICY PROVISIONS ON FORCED AND CHILD LABOR

The Human Rights & 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 Labor Policy, expresses the clear directive to suppliers that we do not support, engage in, or accept 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 in this particularly vulnerable group.

The Forced Labor Policy stipulates strict commercial consequences to identified cases of forced labor and seeks to prevent suppliers from considering any reliance on forced labor practices. Additionally, our Responsible Purchasing Practices Policy supports preventing the occurrence of forced labor.

Regarding child labor, the Code of Conduct and the Supporting Guidelines complement the Human Rights & Equity Policy by expressing clear expectations towards suppliers, including on prevention of employment of children through age verification and on remediation processes in case children have been employed.

## Alignment with Internationally Recognized Instruments

The Human Rights & Equity Policy and C&A Code of Conduct for Suppliers are fully aligned with the following international instruments & frameworks:

- UN Guiding Principles on Business and Human Rights.
- International Bill of Human Rights.
- International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work.
- OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector.

*CSRD and CSDDD are setting a new benchmark for responsible business conduct. These developments come at a critical time, offering a needed push to strengthen protections for workers and embed sustainability more deeply across value chains.*

*In a world where social and environmental risks are increasingly intertwined, Europe's moral leadership – both regulatory and voluntary industry-led – is essential. For us, due diligence is a principled commitment to fairness and future-proofing our business.*

## Monitoring of Policies

Compliance with our Code of Conduct is monitored by annual Social and Labor Convergence Program (SLCP) assessments and verifications of upstream merchandise suppliers. Dedicated local social compliance teams follow-up on any non-compliances that are identified and on the implementation of corrective action plans.

The Purchasing Practices Policy and Responsible Exit Policy are monitored every two years through ACT surveys asking relevant internal staff and suppliers to assess C&A's level of implementation.

The responsibility for implementing the Human Rights & Equity Policy resides with the European C&A Management Team, with oversight and monitoring entrusted to the Human Rights Governance Council.

The responsibility for implementing the General Terms & Conditions for the Purchase of Merchandise resides with the Head of Legal.

The responsibility for all other policies mentioned in this disclosure resides with the Head of Sustainability.

## 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 the 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, C&A supports suppliers to comply with the requirements of the C&A Code of Conduct and the content of the Supporting Guidelines, where appropriate, by offering guidance on best practices for management systems, including through training and advisory services of designated third parties.
- We assess production units against the C&A Code of Conduct, identifying and ensuring remediation of non-compliances as part of our monitoring process.
- For merchandise supply chain, C&A expects all suppliers to submit third party verified Social and Labor Convergence Program assessments at least once a year for all production units used at tier 1 (final product assembly) and washing, printing,

dyeing, or embroidery units at tier 2. In Bangladesh, Cambodia, Vietnam, Pakistan, and Indonesia ILO’s Better Work team conducts assessments for all factories that have signed up to the Better Work program. In exceptional cases, C&A will order dedicated third parties to conduct C&A own audits at these units or accept approved third party audit results shared by the supplier. In addition, C&A local social compliance teams undertake unannounced visits to production units selected in a risk-based approach.

- In the context of any assessment, audit, or visit, 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 instruct 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.

In addition, we continuously examine the potential for negative impacts on workers from our sourcing and purchasing practices, and we commit to introducing adaptations as required. Through the implementation of our Responsible Purchasing Practices Policy and Responsible Exit Policy, we seek to prevent such negative impacts in alignment with our commitments as a member of ACT. Beyond that, the Supporting Guidelines, in alignment with the Terms and Conditions

for the Supply of Merchandise, specify that a supplier may submit any evidence to C&A if it reasonably believes that C&A has caused or contributed to a violation of the C&A Code of Conduct by not adhering to commitments to responsible purchasing practices. A supplier may also indicate that remediation requires C&A’s participation. C&A is willing to review any evidence provided by the supplier in support of such claims and 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.

## Remediation Actions

In terms of remediation and mitigation, the following general processes are in place and addressed 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. 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.
- 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.

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

VISIT DESCRIPTION	ASSESSMENTS
SLCP Assessments <sup>1</sup>	500
Better Work Assessments	103
C&A Audits	36
Additional On-Site Visits by C&A Staff (incl. visits for verification of remediation)	233

<sup>1</sup> Better Work Assessments in Bangladesh, Vietnam, Pakistan, and Indonesia are carried out using step 1 of the SLCP Converged Assessment Framework (CAF)



- 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 tolerance).
  - » Each evaluation leads to a rating that has clearly defined business implications, which are communicated to suppliers and production units in mandatory trainings. C&A provides feedback to suppliers on their performance.
  - » 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 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. Through such reviews, our local teams or dedicated third parties seek to ensure that production units address the actual cause of non-compliance to prevent recurrence.
  - » 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.
  - » In terms of remedy, we also require in our Code

of Conduct that all suppliers have effective operational-level grievance mechanisms in place and enable worker representation.

## Collaborative Actions

For severe incidents, in which our leverage on the production unit is not sufficient to motivate the respective management to apply meaningful corrective actions, we seek collaboration with other brands sourcing from the same unit to align on required corrective actions and ensure remediation.

We are partners of the ILO/IFC Better work program in Bangladesh, Pakistan, Vietnam, Indonesia, and Cambodia. As a capacity-building measure, factories covered by this program receive technical support from Better Work experts to ensure that they address the root causes of identified non-compliances to ensure long-lasting improvements.

Throughout the reporting period, our local teams and designated third parties have followed up on non-compliances identified in assessments, audits, or investigations in response to a complaint and verified whether agreed corrective actions have been taken and led to remediation of the issue. More severe issues were given priority. These processes will be continued during the financial year 2025/2026 for all material topics.

## Grievance Mechanisms

### **Fairness Channel: C&A's Own Grievance Mechanism**

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.

See additional details on procedures and governing policies related to the Fairness Channel on [page 91](#).

We inform workers about the Fairness Channel via posters that have been published visibly at tier 1 production units in areas often visited by workers. At the end of the reporting period, the roll-out of posters has been ongoing in production units located in P.R. China but has been fully completed in all other tier 1 production units.

Since the establishment of the Fairness Channel, complaint submissions by workers in the supply chain made through this tool have continued to increase. Out of 18 cases received in the reporting period through this channel, 10 were found to be fully or partially substantiated, and two are still under investigation. Of the 10 substantiated cases, seven could be resolved within the reporting period. In addition, workers, trade unions, and other organizations representing workers' interests continue to refer cases to us through e-mails.

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 the supplier. To ensure legitimacy, suppliers can be required to pay a contractual penalty if retaliation against a complainant is confirmed.

## Grievances Received via Third Party Mechanisms

Regarding channels to raise concerns and have them addressed that are operated by third parties, C&A participates in the following complaint mechanisms:

*a) Complaint Mechanism of the International Accord's Country Programs: the Bangladesh Safety Agreement and Pakistan Accord*

The Worker Complaint Mechanism under the Bangladesh Safety Agreement is operated by the RMG Sustainability Council. It is accessible to all employees in our sourcing factories, including our tier 1 suppliers, through a dedicated hotline that is actively promoted during worker training sessions. The mechanism has earned trust among workers, as reflected in the high number of submitted and resolved complaints, particularly on occupational safety and health (OSH) issues.

The Worker Complaint Mechanism under the Pakistan Accord began in 2024. All workers and their representatives of Pakistan Accord-covered factories have the right to raise safety and health concerns with an independent, impartial, and confidential Complaints Mechanism. A team of Complaints Specialists are responsible for investigating and resolving complaints and ensuring effective remedy.

*b) ACT - Interim Dispute Resolution Mechanism in Bangladesh (as part of our ACT membership)*

During the reporting period, four new complaints regarding C&A suppliers in Bangladesh were received through this channel. Cases were related to unpaid severance owed upon termination. Three have been resolved successfully during the reporting period. In the remaining case, a solution was under negotiation at the end of the reporting period and has since been resolved. 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 by C&A given that between November 2020 and February 2025 it received 142 eligible cases regarding all ACT brands covering 1,621 workers, of which 75% could be fully and a further 1% partially resolved.

*c) Worker Support Center (until end of December 2024, in collaboration with German Partnership for Sustainable Textile)*

The Worker Support Center is an online grievance mechanism 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 have cooperated with MUDEM on the investigation and remediation of complaints related production units of C&A suppliers and have supported MUDEM in providing detailed information on the complaint mechanism at 11 selected production units in Turkey. During the reporting period, five complaints were received via this channel. Three complaints were not substantiated. The remaining two substantiated

complaints have been fully remediated. The substantiated issues concerned verbal harassment and incorrect overtime payments.

## Stakeholder Engagement with Workers and their Representatives

Based on our general commitment to stakeholder engagement, throughout the due diligence process we actively seek perspectives of workers, their representatives, and civil society or expert organizations credibly representation of their interests.

Our engagement with workers or their representatives occurs on factory level by including interviews with workers and worker representatives in assessments and factory visits. 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 identified violations have been remedied (remedial measures), or for investigations in connection with reported complaints (complaints procedure). In addition, interviews with workers are part of the process of verifying the self-assessment of suppliers (preventive measures), again with a view to determining whether violations occurred. This occurs annually, at a minimum. 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 at factory level, 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 trade union affiliates at country level and, in the case of the Accord, UNI Global Union. In the context of ACT, C&A has also signed an agreement with IndustriALL supporting the implementation of factory-level collective bargaining agreements in Cambodia that include wage increases. The agreements and processes agreed for the International Accord and ACT are co-created between brand and trade union representatives, thereby enabling solutions in line with workers' priorities.

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, collaborate projects to prevent, mitigate, or remediate the issues.

C&A sustainability leaders engage with trade unions and civil society organizations and 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.

At the heart of our efforts is a recognition that human rights due diligence is a set of interventions that directly affect people's lives. These efforts reflect our commitment to the workers behind our products.

Every grievance resolved, every corrective action implemented, and every union-supported agreement represents a step toward greater dignity, fairness, and safety for people in our value chain.

As we continue to strive to live up to and step up our standards, we remain committed to ensuring that our work honors the lived realities of workers and contributes meaningfully to their well-being.

# Progress Update/Actions

For each of the material topics listed below, the following descriptions explain any severe incidents identified in 2024, and our ongoing or planned actions to mitigate negative impacts.

## Working Time

During the reporting period, C&A's assessments identified one severe incident regarding working time in an upstream production unit in Egypt involving excessive and extended overtime due to lack of rest days. The case was identified shortly before the end of the reporting period. In this case, a corrective action plan is underway, and C&A will only continue placing orders with the supplier if the identified practices are addressed in a sustainable and verifiable manner.

- Wage arrears not being paid on time to workers who resigned or were terminated (six cases in Bangladesh, one in Cambodia).
- Payments below the minimum wage to individual workers (six cases in Bangladesh, one case in Vietnam), as well as piece-rate workers receiving less than the minimum wage (one case in Vietnam, one case in India).
- Late regular wage payments (two cases in Bangladesh, two in cases in Turkey).

Corrective actions on these 20 incidents have been agreed. In 14 cases, the issues have already been successfully remediated. In one case, the supplier was asked to discontinue C&A production at one of their production units due to insufficient cooperation and breach of trust in relation to confirmed unauthorized sub-contracting practices, which represent a serious

breach of our sourcing standards and transparency expectations. The remaining cases will be followed up by local social compliance staff in accordance with regular processes during the financial year 2025.

Wage-related incidents occur relatively frequently, yet, in most cases, relate to individual workers and are therefore not considered indications of a systemic issue affecting a large number of workers or wider parts of our supply chain.

## Case Study: Living Wages

As a member of ACT, we work in collaboration with other brands and IndustriALL Global Union towards the achievement of living wages. In this context, C&A has signed a legally binding agreement with IndustriALL Global Union to support the implementation of factory-level collective bargaining agreements in Cambodia that include wage increases. Factories that sign a respective template bargaining agreement developed by the trade union federations and manufacturers' association in Cambodia will pay wages above the currently applicable base wage at the factory and will provide other benefits for workers, such as additional maternity and paternity leave and special leave days. Workers also get access to funding from a training fund supported by C&A to ensure they do not experience any loss of income that could occur while spending time on skills development trainings. Signing the agreement supports our progress towards improving wages for garment workers in our value chain. In addition, our support agreement strengthens the protection of freedom of association and the right of local unions to collective bargaining.

## 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 (two cases in Cambodia, one case in Vietnam, one case in Turkey).
- Discriminatory dismissal of trade union members (two cases in Turkey, one case in Bangladesh).

Four of these cases have already been successfully remediated during the reporting period. For the three remaining incidents, remediation processes are still ongoing and will be monitored until final remediation during financial year 2025.

C&A is actively monitoring the presence and quality of worker and trade union representation and collective bargaining agreements to better understand the extent to which workers' rights are being upheld in practice, especially in contexts where legal protections may be limited. According to assessment data at the end of the reporting period, 73 production units in countries with at least limited space for free exercise of the right to freedom of association had at least one trade union. During the financial year 2025, we will deepen our analysis to determine whether collective bargaining agreements are in place that go beyond national legal requirements.

## Occupational Safety and Health

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:

- Fourteen violations of occupational safety and health standards (nine cases in Cambodia, three in P.R. China, one in Vietnam, one in Serbia), which primarily were related to missing certificates of building or structural safety, fire safety, or boiler safety; a few cases concerned gaps in safety for elevators and lack of fire drills.
- One boiler accident occurred at a tier 2 production unit in Pakistan without any person being injured.
- Except for two cases in which remediation is still being monitored, all cases have been fully remediated during the reporting period.

We continued to support the pilot for an Employment Injury Scheme in Bangladesh 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 permanent disability.

Ultimately, the pilot is intended to be transferred into a sector-wide, nationally legislated program.

## Non-Discrimination and Equal Treatment

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:

- Discriminatory recruitment practices based on gender
- Recruitment practices discriminating against disabled persons (one in Pakistan, one in India).
- All four cases were remediated by suppliers adapting recruitment policies and practices during the reporting period.

## Violence and Harassment at the Workplace

During the reporting period, C&A's assessments and/or grievance channels identified one severe incident regarding gender-based violence at a production unit in our upstream supply chain in India. While the individual responsible for the incident has been terminated and is subject to criminal process, corrective action at the production unit involved establishing effective grievance mechanisms and supportive training. Further implementation of these corrective actions is still monitored in collaboration with other brands.

During the reporting period C&A also signed one legally binding agreement with civil society organizations representing the interest of workers regarding trainings and complaint mechanism implementation addressing gender-based violence and harassment at a production facility in India. By establishing a worker-management complaint mechanism, C&A seeks to gain insights and address negative impacts on women workers, especially those who are particularly vulnerable due to their status as migrant worker or being affected by a caste-based exclusion.

## Forced Labor

One case of forced overtime was detected at an upstream production unit in Turkey during the reporting period. A corrective action plan has been developed and has been partially implemented already. Further measures will be monitored according to C&A's regular processes.

## Child Labor

During the reporting period, C&A's assessments and/or grievance channels identified two severe incidents regarding child labor at production units in our upstream supply chain (one in Bangladesh, one in P.R. China).

The case in Bangladesh occurred at a production unit that had been used without prior authorization from C&A, in violation of our C&A Code of Conduct and Undisclosed Production Rules. As a key learning from this case, C&A has started to critically assess how suppliers operating in Bangladesh without their own offices in the country monitor their production units, including measures to prevent unauthorized subcontracting.

In the case in Bangladesh full remediation was achieved for the children identified. In the case in P.R. China, parents of the identified child persistently rejected the suggested remediation process.

These cases of child labor are considered individual incidents and not of a widespread or systemic nature.

## Enhancing Internal Practices for Better Supply Chain Due Diligence

Over the past year, C&A has strengthened our commitment to responsible sourcing by investing in a rigorous hybrid assurance model that combines the reach of third-party assessments with the depth of our internal Sustainable Supply Chain (SSC) program. This model enables full coverage of production units through third parties while reserving strengthened internal capacity for targeted, high-impact interventions – such as unannounced site visits, grievance handling, and remediation – where risks are most acute and leverage is strongest. It reflects a strategic, multi-layered system aligned with the UN Guiding Principles on Business and Human Rights, enabling meaningful engagement, continuous monitoring, and effective remedy.

As of the end of the reporting period, we have 22 staff members embedded in local sourcing offices across key production regions and we continue upskilling and staffing our team. These colleagues are responsible for implementing the SSC program, including onboarding and risk assessments, managing worker complaints, and following up on corrective action plans. Their work is coordinated by a dedicated staff member at headquarters, ensuring alignment between field operations and strategic oversight. In addition, Social Stewardship – a strategic policy, standard-setting, and stakeholder engagement team – provides guidance to ensure that our program aligns with evolving human rights due diligence requirements and international standards, and that internal standards continuously

evolve to reflect emerging risks and expectations. We continue to maintain high vigilance of local teams on cases of undisclosed production and clarify to suppliers the severity that we attach to such occurrences. Cases of undisclosed production often entail the identification of severe negative impacts on workers at production units that should never have been part of our value chain. We continue to seek a reduction of cases of unauthorized subcontracting despite increased vigilance, at least until the end of financial year 2025.

Additionally, we reflect on the potential negative impacts of our sourcing and purchasing practices on workers, and we commit to continuous listening and learning with regard to more responsible purchasing practices as required.

The implementation of our Responsible Purchasing Practices Policy and Responsible Exit Policy helps us prevent negative impacts on workers from occurring through C&A's own purchasing practices and sourcing decisions. During the financial year 2025, we seek to roll out new training on responsible purchasing practices for all relevant staff.



# S4 Consumers & End Users

Consumers benefit from high quality, affordable fashion aligned with high ethical standards. Fashion can also have indirect impacts on consumers – from product safety to social and environmental concerns – which is why we work to offer clothing that meets high standards. We continue to improve how our products are made, with the goal of supporting more informed and responsible customer choices. Affordability is also central to our inclusivity approach, ensuring broad access to products designed with durability in mind.

In addition to ensuring that we are providing the products consumers are looking for, we also have a responsibility to ensure that we protect their data, and that we prioritize their health and safety.

## Impacts, Risks, and Opportunities (IROs)

Consumer protection and data privacy are priorities at C&A. Customers engaging in digital transactions may face risks such as unauthorized access to personal or payment information. We take these risks seriously and have implemented robust safeguards to protect customer data.

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.

Our strictly enforced policies and dedicated actions aim to limit the risk of data and privacy infringements incidents.

Additionally, our customers' health, safety, and enjoyment of our products are fundamental. We work diligently to ensure product quality and safety, with the aim of meeting or exceeding industry standards, legal requirements, and our customers' expectations.

IRO DESCRIPTION	IRO TYPE	TIME HORIZON	VALUE CHAIN	MATERIAL TOPIC
Data privacy incidents	Negative impact	Long	Own operations	Data privacy
Data privacy related operational, compliance, and reputational risk	Financial risk	Long	Own operations	Data privacy
Consumer health and safety related to products	Negative impact	Long	Own operations	Consumer health and safety
Consumer health and safety related operational, compliance, and reputational risks	Financial risk	Long	Own operations	Consumer health and safety

# Data Privacy

## Policies

We are fully compliant with the General Data Protection Regulation (GDPR), which governs the way in which C&A can use, process, and store personal data. The GDPR 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.

Our data privacy 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.

### DATA PROTECTION POLICY

The Data Protection Policy for C&A underlines responsible parties, the method and purpose of data collection, period of retention, legal basis for data collection, and outlines the rights of consumers and end-users. By having Data Processing Agreements (DPAs) with processors we ensure that the data we share with them is always safe and secure.

The C&A Group consists of different legal entities, and the company responsible for the processing of personal data is dependent on the purpose for which it is collected. For each processing purpose, consumers will

be clearly and transparently informed of the company responsible for the processing. We ensure security of all personal data by maintaining Registers of Processing Activities (ROPA), Technical and Organizational Measures (TOMs), Data Processing Agreements (DPAs), and by having an Intragroup Data Transfer Agreement (IGDTA) describing all the shared services between the group companies. There is an established data breach notification process in place to enable swift action in case a data breach occurs.

### GENERAL C&A "SPECIAL CATEGORY DATA" POLICY

Special category data is personal data which the GDPR considers to be sensitive and potentially discriminatory. 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.

### REMEDIATION AND BREACH NOTIFICATION POLICY

In case of a breach, C&A's 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.

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](mailto:dataprotectiononline@canda.com).

## Progress Update/Actions

To keep the staff up-to-date and in touch with Data Protection, regular training is provided, and we maintain a Data Protection Council which consists of senior representatives from functions dealing with personal data for guaranteeing smooth cascading of data protection responsibility.

### HOW DATA PROTECTION COMPLAINTS ARE HANDLED

The customer service channel at C&A is operated via an external 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 third party. 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-time or near real-time reporting tools, or system-generated reports

When a complaint is submitted via email to [dataprotectiononline@canda.com](mailto: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 or the Fairness Channel are immediately reviewed and assigned to a caseworker from the Data Protection Team, initiating an investigation without delay. Read more about the Fairness Channel on [page 62](#).

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 information provided, 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.

The relevant processes are subject to periodic checks by the Group Data Protection Manager (or its designee) or external consultants. If a potential improvement is identified, the relevant department will take prompt action to implement the improvement. The findings of the checks are documented in writing and handed over to the local Data Protection Officer, the management of the local C&A entities, and the people responsible. 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.

# Health & Safety

The safety and quality of our products are fundamental to our business. We aim to meet or exceed industry standards, regulatory requirements, and our customers' expectations. We work with others in our industry to raise standards throughout the apparel sector, and we also support our suppliers, factories, and colleagues to understand safety risks and collaborate with industry associations on the topic.

## POLICIES

One hundred percent of our products sold in Europe undergo assessment for health and safety impacts. For baby and children's clothing, we apply especially rigorous safety criteria. Product testing is conducted in collaboration with accredited external laboratories, including SGS, Intertek, and Bureau Veritas, to ensure our collections comply with the latest legal, safety, and chemical standards.

## OUR RESTRICTED SUBSTANCES LIST

C&A has adopted the Apparel & Footwear International RSL Management (AFIRM) Restricted Substances List

(RSL) and makes it the binding RSL standard for C&A suppliers and manufacturers at all levels of the supply chain.

The AFIRM RSL protects consumers and end users of materials and products from harmful levels of chemicals. It is used as a reference for limits and testing methods of restricted substances possibly found in raw materials, semi-finished products, and finished products.

Besides restricted substances of the AFIRM RSL, there are some additional chemical parameters that C&A restricts for our products. These include restrictions for per- and polyfluoroalkyl substances (PFAS), polyvinylchloride (PVC), and heavy metals for toys.

## PROGRESS UPDATE/ACTIONS

In 2024, we enhanced compliance with evolving EU product safety and sustainability regulations and strengthened our marketing teams' ability to communicate inclusivity responsibly and effectively

through targeted training, updated communication guidelines, and enhanced review processes.

## COMPLAINTS

During FY2024, C&A received 125 consumer complaints through our Fairness Channel. Twenty-four of the 125 complaints alleged human rights concerns, out of which twelve were substantiated. Eleven were confirmed to, more likely than not, include elements of discrimination or harassment, and one was related to health and safety.

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.

In 2024, C&A didn't have any public product recalls.

# Transparency

At C&A, we have been committed to greater transparency for many years. Our goal is to empower our customers to make informed choices by providing clear information about our products, brand, materials, production processes, 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. On the other hand, incorrect or opaque information can negatively impact consumers. If the wrong information is provided, risks identified are related to compliance, penalties, product removal, and reputational damage.

We promote supply chain transparency primarily through the [Open Supply Hub](#), material transparency via a [dedicated webpage](#), and general brand transparency through our [company website](#).

We engage with our customers through our customer service channel and an annual consumer survey to better understand their perspectives on transparency. Periodic dedicated research related to on-product labeling serves as an additional source of information.

To measure our progress, we have set a target that by

2028, 55% of our customers will feel they can make informed choices when shopping at C&A. In 2024, 38% of our customers felt they could make informed purchasing decisions based on environmental and social product attributes, a slight increase from 2023. This highlights that we must continue improving the level of information provided and streamline stronger sustainability communication.

We see legislative developments, such as the recently adopted Empowering Consumers Directive, as a timely opportunity to enhance transparency and support consumers in making informed choices about sustainability. While these initiatives are still unfolding, we are taking our own steps to safeguard these topics.

We will continue to enhance the information provided across all channels and assets. Rebuilding consumer trust in sustainability claims requires both industry and legislative efforts, making the standardization of sustainability communication across the industry an important step.

# Governance

To achieve our ambition to do what is best for people and the planet, we need to start with how we conduct our business. This section covers activities related to corporate culture, including our key policies, internal training programs on key topics, and our approach to supplier relationships.



# G1 Business Conduct

We have been intentional about how we have shaped and maintained our internal culture so that it supports our values, and within this we have a particular focus on preventing bribery and corruption. 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.

## Impacts, Risks, and Opportunities (IROs)

To assess the material impacts related to business conduct, we consider how our actions across the value chain (upstream, own operations, and down-stream) positively or negatively affect people and the environment, including human rights.

We then identify the associated risks and opportunities. In this process, we analyze the potential financial effects of these impacts or dependencies on resources, which may influence our financial performance and position over the short, medium, or long term. These are examined from both a negative (risk) and positive (opportunity) perspective.

Through this approach, we concluded that corporate culture is crucial for ensuring a fair and ethical business environment, with the aim of protect our people, upholding our reputation, and securing the long-term success of our business. Closely linked to business conduct, we consider antibribery and anti-corruption measures essential for maintaining an honest and impartial business environment.

### G1 BUSINESS CONDUCT

IRO DESCRIPTION	IRO TYPE	TIME HORIZON	VALUE CHAIN	CORPORATE CULTURE
Fair and ethical business environment	Positive impact	Long	Own operations	Corporate culture
Honest and unprejudiced business environment	Positive impact	Long	Own operations, Upstream	Anti-bribery and corruption

# Corporate Culture

## Strategy

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.

Additionally, a number of complementary policies are in place to address specific risks and promote ethical business conduct. All sustainability matters related to business conduct that are deemed material according to the double materiality assessment are covered or referred to in one of C&A's policies.

## POLICIES

Key policies related to corporate culture include:

- I. C&A Code of Ethics and Conduct**
- II. C&A Code of Conduct for Suppliers**
- III. Forced Labor Policy**
- IV. Human Rights & Equity Policy**
- V. Responsible Purchasing Practice Policy**
- VI. Undisclosed Production Rules Policy**
- VII. C&A Code of Procedure of the Fairness Channel**
- VIII. Animal Welfare Policy**

## KEY POLICY DETAILS

The intention, key provisions, and monitoring processes behind each policy are further described below.

Where relevant, additional details are provided related to scope, responsibility for implementation, and alignment with third-party standards.

- I. The **C&A Code of Ethics and Conduct** is C&A's policy framework for our ethical operations. It defines C&A's expectations regarding social, governance and environmental requirements that all C&A employees need to adhere to in their daily work. The C&A Code of Ethics and Conduct considers the interests of our key stakeholders, including employees, customers, suppliers, business partners, public authorities, and the communities in which we operate. It emphasizes legal compliance, integrity, responsible behavior, and respect for human rights. Overall, the Code aims to harmonize C&A's business interests with stakeholder expectations.

### 1. Key Contents & General Objectives

- a. Compliance with Laws: C&A is dedicated to ensuring compliance with all applicable laws,

rules, and regulations in every country or region where it operates.

- b. Equity and Inclusion: C&A embraces diversity and inclusion, ensuring fair treatment and equal opportunities for all individuals.
- c. Respect for Human Rights: C&A is committed to respecting and promoting human rights, ensuring safe workplaces, fair labor practices, and the rights of workers throughout our supply chains.
- d. Environmental Responsibility: C&A takes proactive steps towards sustainability, prioritizing suppliers who share our commitment to environmental protection.
- e. Data Privacy: C&A follows strict standards to protect personal data and ensure privacy.

### 2. Process for Monitoring

- a. Reporting: Coworkers are encouraged to seek advice, report any violations, and cooperate in investigations. C&A promotes open communication and provides mechanisms for raising grievances and whistleblowing concerns without fear of retaliation. Violations can be reported through the C&A Fairness Channel (detailed on [page 62](#)) or directly to managers, People and Culture Business Partners, or the Compliance Officer.
- b. Leadership Responsibilities: Leaders must inform their teams about the importance of the C&A Code of Ethics and Conduct, lead by example, and create a safe space for raising concerns.
- c. Continuous Improvement: C&A encourages continuous improvement in ethical behavior, compliance, and responsible business practices.
- d. Review: The Code of Ethics and Conduct is regularly reviewed and revised as needed by C&A.

### 3. Scope

The Code of Ethics and Conduct at C&A extends to all activities and individuals within the organization, without exception. It applies to all C&A employees, including interns, temporary workers, leaders, and members of the Management Board.

### 4. Most Senior Level Accountable for Implementation

The Code of Ethics and Conduct is enforced by the Management Board of C&A BV for the C&A group of companies. Implementation and accountability for abiding by the policy standards rests with the most senior leadership at C&A. The C&A Code of Ethics and Conduct has been implemented since the beginning of 2024.

### 5. Alignment with Relevant Third-Party Standards

The Code of Ethics and Conduct emphasizes C&A's commitment to upholding international human rights standards, local labor laws, and legal frameworks, ensuring the dignity of all individuals impacted by our business. We align our standards for equity and inclusion, human rights, fair competition, data privacy, and protection of personal data with applicable laws and international standards.

It is important to note that where there are more stringent local laws or regulations, the provisions of the Code of Ethics and Conduct would be superseded by these local requirements. This demonstrates C&A's commitment to comply with the law within our operational scope.

II. The **C&A Code of Conduct for Suppliers** sets C&A's expectations towards our merchandise suppliers and business partners regarding compliance, human rights, labor practices, environmental performance,

animal welfare, and anti-corruption, including our commitment to identifying, preventing, mitigating, and remediating negative impacts in the supply chain. The document emphasizes the importance of adhering to these standards as part of our commitment to international human rights, labor rights, and environmental protection.

#### 1. Key Contents & General Objectives

- a. Legal Compliance: Suppliers and business partners must comply with all applicable laws and regulations, including obtaining necessary permits and licenses.
- b. Human Rights and Labor Practices: This includes prohibiting child labor, forced labor, and discrimination, supporting freedom of association, ensuring respectful treatment, and providing safe and healthy working conditions.
- c. Environmental Performance: Suppliers must manage environmental risks, adhere to sustainable chemical management programs, and minimize discharges to the environment.
- d. Animal Welfare: Suppliers of animal-derived materials must conform to C&A's Animal Welfare Policy.

#### 2. Process for Monitoring

- a. Self-Assessments and Audits: Suppliers and business partners are required to conduct self-assessments and may be subject to audits by C&A teams or designated third parties to ensure compliance
- b. Grievance Mechanisms: Suppliers must establish their own grievance mechanisms that allow workers to raise concerns confidentially and without fear of retaliation. Additionally, C&A

maintains a whistleblowing and grievance channel (Fairness Channel, read more on [page 62](#)) accessible to anyone who wishes to report unethical behavior, violations of the law, or violations of the C&A Code of Conduct.

- c. Continuous Improvement: C&A encourages suppliers to aim for continuous improvement in human rights, working conditions, and environmental performance. The Code of Conduct for Suppliers is regularly reviewed by C&A and will be revised if needed.

### 3. Scope

The Code of Conduct applies to all C&A merchandise suppliers.

- a. For contract partners in the supply of merchandise (suppliers), the Code of Conduct applies to all production units used to manufacture, finish, or process C&A merchandise or components thereof, regardless of whether these production units are operated by entities that are fully or partly owned by the suppliers, including subsidiaries (majority stakes) and affiliates (minority stakes), or contracted by agents/importers or are subcontracted entities or persons. The manufacturing, finishing, or processing of C&A merchandise or components thereof can include any process of cutting, sewing, embroidery, trims, accessories, printing, laundry/washing, dry processing, garment dyeing, panel knitting, linking, and final assembly/packing.
- b. C&A requires our suppliers to communicate the requirements of the Code of Conduct to their own suppliers and business partners and ensure adherence by adequate means.

### 4. Most Senior Level Accountable for Implementation

The responsibility for the Code of Conduct for Suppliers lies with the Head of Sustainability. The current version of the C&A Code of Conduct was implemented in 2023.

### 5. Alignment with Relevant Third-Party Standards

The requirements regarding the environmental performance in the C&A Code of Conduct are driven by C&A's obligations to external organizations and programs.

Suppliers with wet processes such as fabric dyeing and finishing, garment washing, tanning, printing, and finishing are requested to collaborate with C&A in working with the Zero Discharge of Hazardous Chemicals (ZDHC) Program. Hazardous work is defined in line with ILO Recommendation No. 190.

The expectations set out in the Code of Conduct in regards to human and labor rights reflect C&A's commitment to promoting adherence to internationally agreed human rights standards throughout our supply chain and business relations, in line with the United Nations (UN) Guiding Principles on Business and Human Rights, the International Bill of Human Rights and the International Labour Organisation (ILO)'s Declaration on Fundamental Principles and Rights at Work.

III. The **C&A Forced Labor Policy** outlines C&A's commitment to eradicating forced labor, modern slavery, and human trafficking within our supply chain. The C&A Forced Labor Policy specifies section

3.3 of the C&A Code of Conduct and further defines the obligations of C&A suppliers regarding the avoidance of forced labor. The policy specifies the obligations of suppliers as part of their contractual agreement with C&A.

#### 1. Key Contents & General Objectives

- a. Prohibition of Forced Labor: C&A strictly prohibits all forms of forced labor, including bonded, indentured, and prison labor
- b. Supplier Obligations: Suppliers must ensure that all work is voluntary and must not infringe upon the free choice of employment. This includes not requiring deposits, retaining identity documents, or withholding wages. Suppliers must allow workers to terminate their employment contracts after reasonable notice.

#### 2. Process for Monitoring

- a. Disclosure Requirements: All production units used for C&A production must be disclosed to C&A as defined in the C&A Code of Conduct and the Undisclosed Production Rules.
- b. Sanctions for Violations: C&A considers forced labor to be an egregious violation of the contractual relationship. We reserve the right to impose several sanctions on suppliers found culpable for forced labor practices, including the termination of the business relationship and cancelling orders.

#### 3. Scope

The Forced Labor Policy applies to all stages of production within our supply chain, including direct and indirect supplier-controlled processes (tier 1), extended supply chain processes (tier 2 and

further), and raw material production.

#### 4. Most Senior Level Accountable for Implementation

The responsibility for the Forced Labor Policy lies with the Head of Sustainability.

#### 5. Alignment with Relevant Third-Party Standards Implementation

The Forced Labor Policy is aligned with the International Labour Organisation (ILO) Convention No. 29.

IV. The **Human Rights & Equity Policy** reflects C&A's commitment to establish and promote a culture of respect for internationally recognized human rights as set out by the UN Guiding Principles on Businesses and Human Rights. This commitment is reflected in ongoing stakeholder consultation, which aims to establish meaningful dialogue with community representatives, civil society, and organizations led by individuals from underrepresented groups.

#### 1. Key Contents & General Objectives

- a. Human Rights Risk Management: C&A implements and maintains a robust human rights risk management system to mitigate risks and negative impacts on people and communities across our operations, business relationships, and supply chain.
- b. Children's Rights: The policy emphasizes the protection of children's rights within C&A's operations and supply chain.
- c. Forced and Compulsory Labor: C&A strictly prohibits all forms of forced and compulsory labor.

d. Freedom of Association: The company supports the freedom of association for all employees.

e. Occupational Health and Safety: C&A takes appropriate measures to prevent occupational illnesses, injuries, and accidents, promoting a healthy work environment. Suppliers and business partners are expected to adhere to the same principles.

f. Working Conditions: The policy ensures reasonable working hours and fair compensation for all employees.

g. Respectful Treatment: C&A is committed to ensuring respectful treatment of all employees, free from harassment and abuse.

h. Equity, Inclusion, and Non-Discrimination: We promote equity, inclusion, and non-discrimination in all aspects of our operations.

i. Environmental Impact: C&A aims to improve the environmental impact of our supply chain.

#### 2. Process for Monitoring

- a. Policies: Regular review of the existing C&A policies related to this matter.
- b. Risk Assessment: Assessing potential and actual impacts on human rights, including within C&A's supply chain.
- c. Corrective Actions and Remedies: Where actual negative impacts are identified, C&A ceases or at least mitigates adverse impacts on people. C&A tracks the implementation and results of these measures and updates relevant corrective measures regularly.
- d. Grievance Mechanisms: The company provides a grievance channel, the Fairness Channel, for reporting violations. C&A takes timely actions

to investigate human rights complaints and to provide or enable remedy where complaints are substantiated. Additionally, C&A also participates in selected non-judicial, external grievance channels.

e. Transparency and Reporting: C&A regularly publishes details concerning risk analysis results, implementation strategies, and concrete measures according to applicable laws, as well as in our Sustainability Reports.

#### 3. Scope

The Human Rights & Equity Policy applies to all C&A employees, including interns, temporary workers, leased workers, employees of business partners, and people working across the supply chain. It also includes business entities in the supply chain for merchandise products, including C&A suppliers, the production units used by them, their subcontractors, as well as any pre-supplier of goods, such as fabrics and raw materials. Additionally, it applies to other business partners with whom C&A enters into a contractual relationship for the supply of a non-merchandise product or service.

#### 4. Most Senior Level Accountable for Implementation

The responsibility for implementing the Human Rights & Equity Policy resides with the Management Board of the C&A BV, with oversight and monitoring entrusted to the Human Rights Governance Council. We have adopted a 2028 Strategy for Equity, Inclusion, and Human Rights to guide our efforts.

5. *Alignment with Relevant Third-Party Standards*  
In the Human Rights & Equity Policy, C&A commits to establishing and promoting a culture of respect for internationally recognized human rights as set out by the UN Guiding Principles on Business and Human Rights. C&A commits to adhering to the International Bill of Human Rights (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), the principles of the UN Global Compact, and the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, throughout our own operations, business relationships, and supply chain.
- V. The **Responsible Purchasing Practices Policy** aims to reduce C&A's own contribution to negative impacts on workers' well-being by establishing commitments to fair purchasing prices that include wages, fair terms of payment, better planning and forecasting, responsible sourcing and buying training, and responsible exit strategies.
1. *Key Contents & General Objectives*
    - a. Ensuring purchasing prices that include wages as itemized costs and fair terms of payment.
    - b. Improving planning and forecasting for the suppliers.
    - c. Engaging in training on responsible sourcing and buying.
    - d. Enabling responsible exits aligned with the requirements set forth in the Responsible Exit Policy.
2. *Process for Monitoring*  
As a member of ACT, every other year C&A implements and analyzes surveys among our own staff involved in purchasing practices and with suppliers to review how well commitments are implemented and to identify areas for improvement. Results will be benchmarked against other brands. In addition, as an ACT member, C&A reports key KPIs to ACT to account for the implementation of responsible purchasing practices.
3. *Scope*  
The Responsible Purchasing Practices Policy applies to C&A's own operations.
4. *Most Senior Level Accountable for Implementation*  
Responsibility for the Responsible Purchasing Practice Policy lies with the Head of Sustainability.
5. *Alignment with Relevant Third-Party Standards*  
The Responsible Purchasing Practices Policy is aligned with the ACT (Action, Collaboration, Transformation) Global Purchasing Practices Commitments and aims to ensure fair and responsible purchasing practices. C&A is a longstanding member of ACT, and we apply the ACT Global Purchasing Practices Commitments.
- VI. The **Undisclosed Production Rules Policy** aims at building a transparent and sustainable supply chain, requiring full disclosure of all production units to ensure compliance with social and environmental standards before production begins.
1. *Key Contents & General Objectives*
    - a. Transparency and Disclosure: C&A requires full disclosure of all production units used for manufacturing our products. This includes factories and subcontractors involved in various stages of production such as cutting, sewing, embroidery, printing, and final assembly. All production units must be assessed and approved by C&A for social and environmental compliance and must meet C&A's quality and technical requirements before starting production.
    - b. Collaboration and Support: C&A collaborates with industry stakeholders, including NGOs, government leaders, unions, suppliers, and brands, to share best practices and improve industry standards. The company offers comprehensive support through our sourcing, sustainability, and quality teams to address production challenges and work towards solutions
  2. *Process for Monitoring*  
If a C&A product is found in an undisclosed and unapproved production unit, a dedicated team will investigate and audit the working conditions. Depending on the severity of the case, sanctions might be applied. If zero tolerance issues such as child labor, forced labor, abuse, or severe safety risks are detected, we may suspend or terminate the supplier's account for a minimum of 12 months. The decision will depend on the supplier's transparency and willingness to implement lasting remediation measures.
  3. *Scope*  
The Undisclosed Production Rules Policy applies to all suppliers of C&A merchandise sold at C&A Europe retail or online stores, whose business relationship with C&A is governed by the C&A General Terms and Conditions for the Purchase of Merchandise.
4. *Most Senior Level Accountable for Implementation*  
The responsibility for the Undisclosed Production Rules Policy lies with the Head of Sustainability.
- VII. The **Code of Procedure of the Fairness Channel**, together with the C&A Code of Ethics and Conduct, defines safeguards for the protection of good-faith whistleblowers. The Fairness Channel (detailed on [page 62](#)) is a publicly accessible platform for individuals and entities to file formal grievances or raise whistle-blowing concerns. The Fairness Channel Code of Procedure aims to set out a transparent procedure for submitting reports to identify unethical behavior, violations of standards, or breaches of laws.
1. *Key Contents & General Objectives*
    - a. Respect for Human Rights and Compliance: C&A is committed to upholding human rights, environmental protection, and compliance with laws. The Fairness Channel supports this by providing a formal mechanism for reporting grievances and whistleblowing concerns.
    - b. Non-Retaliation: C&A ensures that there is no retaliation against individuals who, in good faith, raise concerns or assist in investigations related to grievances or whistleblowing.
    - c. Establishment of a transparent procedure: C&A defines in the Code of Procedure the steps to be taken from the submission of a complaint to its conclusion to ensure that reports are handled

with due care and impartially.

## 2. Process for Monitoring

C&A reports on the measures taken in response to reports received in accordance with the applicable law. See additional details on the Fairness Channel on [page 62](#) and whistleblower protections on [page 92](#).

## 3. Scope

The Code of Procedure of the Fairness Channel applies to all individuals and entities regardless of their domicile or relationship with C&A, including our own employees, suppliers and business partners, their workers, customers, and any other individuals, as well as civil society organizations who raise concerns via the Fairness Channel.

## 4. Most Senior Level Accountable for Implementation

In accordance with the law, the responsibility for the implementation of the Code of Procedure of the Fairness Channel resides with the Management Board of C&A BV.

VIII. The **C&A Animal Welfare Policy** defines C&A's commitment to protecting animal welfare throughout our supply chain. It will be effective as of July 2025. The policy aims to reduce reliance on virgin materials, increase traceability, and ban materials where minimum requirements cannot be met.

### 1. Key Contents & General Objectives

- a. Protection of Animal Welfare: C&A is committed to ensuring that animals are not slaughtered solely for fashion purposes.
- b. Promotion of Good Animal Welfare Practices: C&A encourages supply chain partners to

establish their own animal welfare policies, adopting the Five Domains Model to assess both the physical and mental state of animals.

- c. Use of Certified Materials: C&A aims to increase the use of certified materials, including those from animal-derived sources, and has been part of the Fur Free Retailer program since 2016.
- d. Prohibited Sources: C&A prohibits the use of materials from wild animals, including those reared in farming environments and material derived from animal species classed as vulnerable or endangered, defined as those which appear on the Convention on International Trade in Endangered Species (CITES) or the IUCN red list as Critically Endangered, Endangered or Vulnerable.
- e. Sourcing Standards: C&A permits the use of cashmere, wool, alpaca, and silk only when specific sourcing standards are met. We promote the use of certified materials and support innovation in plant-based alternatives to animal-derived products.

## 2. Process for Monitoring

- a. Traceability and Transparency: We are committed to increasing traceability and transparency across our supply chain, ensuring that progress in implementing the Animal Welfare Policy can be traced back to the source of primary production.
- b. Process: Certified materials must follow the defined chain of custody processes specified in C&A's Sustainable Product Manual.
- c. Review: The policy will be reviewed and updated periodically by the Product Sustainability Department

## 3. Scope

The Animal Welfare Policy applies to all products sold by C&A that contain any animal-derived materials. Therefore, the policy is directed towards all supply chain partners and the relevant internal departments within C&A, including the Sustainability Department, Sourcing, Design, and Merchandising Departments.

## 4. Most Senior Level Accountable for Implementation

Responsibility for the animal welfare policy lies with the Head of Sustainability. The new version of this policy, effective from July 2025, will be reviewed and updated periodically by the C&A Product Sustainability Department.

## 5. Alignment with Relevant Third-Party Standards

The animal welfare policy has been developed in close alignment with animal welfare groups.

For materials derived from animal species classed as vulnerable or endangered, C&A relates to the Convention on International Trade in Endangered Species (CITES) and the IUCN red list as Critically Endangered or Vulnerable. C&A has been a member of the Fur Free Retailer Program since 2016 and a member of the Sustainable Fibre Alliance since 2018.

Additionally, C&A commits in the Animal Welfare Policy to:

- Source 100% virgin cashmere from Sustainable Fibre Alliance (SFA) certified farms by 2025.
- Reduce our use of virgin cashmere by using recycled cashmere, which must be certified to

third party standards.

- Increase the sourcing of certified recycled wool.

Finally, C&A does not sell virgin down. All recycled down must be certified to third party standards.

## Policy Accessibility

C&A policies are accessible for C&A employees via our Intranet. Policies relating to broader society are available on C&A's corporate website.

Policies that also apply to C&A suppliers are communicated via the C&A Supplier Information Network, available via the Intranet. Contractual partners who do not have access to this network will receive a copy.

Each newly adopted C&A policy applicable to our employees is communicated by email.

The C&A Code of Ethics and Conduct is also publicly accessible in various languages via the C&A Corporate website: <https://www.c-and-a.com/eu/en/corporate/company/culture/code-of-ethics-and-conduct>.

The updated Animal Welfare Policy has been communicated internally to designers, product developers, and quality teams, as well as merchandisers and sourcing colleagues.

## The Fairness Channel – Our Reporting Platform

C&A encourages open and honest communication. Concerns about violations of the Code of Ethics and Conduct should where appropriate, be initially raised with the person involved or discussed with the relevant manager.

Additionally, complaints can be submitted to C&A via the Fairness Channel – confidentially, and if desired anonymously. This is the internet-based reporting platform C&A has established, fulfilling our obligation resulting from the German whistleblower regulation (Hinweisgeberschutzgesetz<sup>1</sup>) and the German Due Diligence Act (Lieferkettensorgfaltspflichtengesetz).

The Fairness Channel is publicly accessible via: <https://fairnesschannel.canda.com>.

It is available to all natural and legal persons, regardless of their place of residence or business or their relationship to C&A. This includes C&A employees, suppliers, business partners, their employees, customers, other individuals, and civil society organizations (e.g., NGOs). The Fairness Channel serves as a portal for official reports from anyone whose rights have been violated, anyone who is at risk of such a violation, or anyone who becomes aware of any risks or violations.

It can be used to report violations of human rights, environmental violations, corruption, fraud, legal violations, breaches of C&A policies, and any other types of misconduct related to the company, such as unethical, dishonest, or unfair behavior by employees or business partners. Additionally, the Fairness Channel allows for complaints related to the operation of the company, including issues regarding employment, services, administration, office environment, or other areas.

Furthermore, the Fairness Channel is a portal through which any person, regardless of whether their own rights are affected, can submit reports in accordance with the European Whistleblower Directive. This includes reporting violations of the law, including breaches of EU law in the areas specified in the European Whistleblower Directive.

C&A provides employees with guidance materials, such as videos, summaries, and a step-by-step guideline on how to submit complaints via the C&A Fairness Channel. The documents can be accessed via our internal network.

Employees who are responsible for processing complaints (case handlers) have access to department-specific manuals for handling and processing complaints.

The Fairness Channel is available in 32 languages to allow unrestricted access.

### HOW COMPLAINTS ARE HANDLED

C&A is committed to investigating business conduct incidents promptly, independently, and objectively. To

guarantee an objective investigation of complaints and mitigate bias, we have established a Code of Procedure for the Fairness Channel and internal department-specific guidelines for handling complaints, which case handlers in the respective departments are required to follow.

In line with our Code of Procedure of the Fairness Channel, the following procedure is established:

- The C&A Fairness Channel automatically forwards incoming reports to the responsible case handler or to a limited group of dispatchers, depending on the source of the complaint and its content. Determining which employees are responsible for handling which complaints is handled at the outset. However, in order to maintain the integrity of the whistleblower system, the names are not communicated outside the group of case handlers.
- If an incident is submitted by email or post, it will be treated as confidential and forwarded to the case handler responsible. The reporting person will receive 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 case handler will initiate an official investigation. This investigation may include, among other things, a review of the facts, interviews, and a discussion with the person reporting the incident.
- All complaints must be taken seriously and dealt with promptly. Complaint investigations should be appropriately documented, treated as confidential to

protect all affected parties, and impartial, free from attempts to influence the outcome. Care is taken to ensure that the reporting person is protected from discrimination or reprisals.

When a violation of rights or a risk has been identified, C&A will take appropriate preventive or remedial action, 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.

All matters are treated with confidentiality, and C&A ensures protection from retaliation for those raising concerns.

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, provided their contact details are known. 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.

Any violation of the Code of Ethics and Conduct can lead to disciplinary action, potentially including dismissal, and may also be reported to the police or other authorities where necessary. In major complaints cases, a Disciplinary Committee has to be invoked by the case handler on an ad-hoc basis. It consists of the responsible Legal Counsel, in cases where violation of labor law is concerned, an Employment Law Counsel, the Head of Human Resources in the respective

<sup>1</sup> As C&A has registered offices in Germany and meets the threshold of 50 employees on average, C&A is subject to the EU Whistleblower Directive (Directive (EU) 2019/1937)

market or function, and the Head of Legal, or a Head of function or market other than the one in which the major complaint occurred, unless the individuals themselves are under investigation or have a conflict of interest.

#### WHISTLEBLOWER PROTECTION

C&A does not have a standalone whistleblower protection policy of its own. However, because many of our policies, guidelines, and standards contain regulations that safeguard whistleblowers, whistleblower protection is strongly embedded across our broader compliance framework. C&A's Code of Ethics and Conduct strictly prohibits any form of retaliation against anyone who raises a concern in good faith within C&A's own business. C&A's Supplier Code of Conduct also requires all C&A suppliers and business partners to inform their employees that they can use C&A's Fairness Channel and the business partner's grievance mechanisms to report concerns and complaints about working conditions or other issues covered by the Supplier Code of Conduct without fear of reprisal, intimidation, harassment, or discrimination.

In the event of breaches, disciplinary actions are implemented in accordance with law, and these can extend to dismissal in serious cases. We have exercised this right where necessary to reinforce a culture of accountability, ensuring that our values are not only stated but actively upheld.

This complies with the norms of the Whistleblower Directive (EU) 2019/1937, demonstrating our commitment to a retaliation-free workplace for whistleblowers.



# Anti-Bribery and Anti-Corruption

## Strategy

Our strategy for preventing bribery and corruption is strongly linked to our corporate culture and explicitly included within several of our key policies. Training and awareness raising programs on these issues, described below, are also part of our strategy.

## POLICIES

There are several specific provisions within the policies described in detail above under “Corporate Culture” that are relevant to anti-bribery and anti-corruption. These are within the following policies:

- I. **C&A Code of Ethics and Conduct**
- II. **C&A Code of Conduct for Suppliers**
- III. **Human Rights & Equity Policy**

These provisions are described below. For additional detail on policy contents and general objectives, monitoring processes, scope, most senior role accountable for implementation, and alignment with relevant third-party standards, see policy detail above under “Corporate Culture.”

## KEY POLICY DETAILS

### I. The **C&A Code of Ethics and Conduct**

#### *Specific Provisions:*

- a. Anti-Corruption: C&A strictly prohibits any form of corruption, bribery, and money laundering. This includes rules governing gifts and entertainment.
- b. Protection of Company Assets: C&A’s assets and resources must be used responsibly and solely for business purposes.

The C&A Code of Ethics and Conduct includes a strict prohibition of any illicit financial activities including corruption, bribery, and money laundering. All C&A co-workers are made aware of these standards and are requested to take steps to prevent bribery by others acting on behalf of C&A, such as by properly vetting third parties with whom C&A engages. Co-workers

are instructed to report any suspicious behavior immediately.

In case of any violation, appropriate disciplinary measures are taken, and severe cases may lead to dismissal. As described, our approach to anti-corruption and bribery is consistent with international standards.

### II. The **C&A Code of Conduct for Suppliers**

#### *Specific Provisions*

- a. Anti-Corruption: Suppliers and business partners must comply with anti-bribery and corruption laws and have policies in place to prevent such practices.

As set forth in the Code of Conduct for Suppliers, we expect our suppliers and business partners to adhere to high ethical standards in business practices, including compliance with all applicable anti-bribery and corruption laws, and the prohibition of offering, paying, soliciting, or accepting bribes, including facilitation of payments. Suppliers are required to have anti-corruption policies and procedures in place to review them regularly to ensure their effectiveness.

### III. The **Human Rights & Equity Policy**

#### *Specific Provisions:*

- a. Anti-Corruption: The policy prohibits any form of direct or indirect corruption, extortion, or bribery.

## PREVENTION AND DETECTION OF CORRUPTION AND BRIBERY

C&A has put comprehensive procedures in place to prevent, detect, and report allegations or incidents of corruption or bribery. Any instances of misconduct reported via C&A's Fairness Channel are investigated independently by the legal department, which primarily has an advisory and monitoring function and is separate from the business units. This ensures objectivity in evaluating allegations and implementing appropriate actions.

If concerns related to corruption or bribery arise, dedicated legal counsel from the C&A legal department will be nominated as the responsible case handler based on the region where the incident is alleged to have taken place.

The Sourcing Integrity department, which prevents and detects corruption and bribery, is part of the C&A Legal Department. Therefore, it is ensured that the investigators or investigating committee are separate from the chain of management which may be involved in the incident.

For matters related to global sourcing units, the Sourcing Integrity Committee (which includes the Head of Sourcing, the People and Culture Lead Asia, and the Senior Integrity Manager) handles the investigations.

Regular meetings of the Sourcing Integrity Committee 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, as well as with

business and functional heads to understand their risks and needs.

Training courses on C&A's Code of Ethics and Conduct, which prohibits corruption, bribery, and money laundering, are also conducted for all employees to enhance their awareness and understanding (read more below under "Anti-Corruption and Anti-Bribery Training Programs). To ensure compliance with these standards, C&A conducts regular internal and external audits to identify corruption and bribery risks in our global sourcing offices, and we also require an annual declaration of conflicts of interest. In addition, perception surveys, which capture the perception of ethical business practices by C&A employees, are regularly conducted at merchandise suppliers and factories.

C&A requires employees to avoid all actions and decisions that could lead to potential conflicts of interest and to strictly adhere to our procurement standards and procedures. All employees must avoid any form of preferential treatment throughout the supplier relationship. To ensure this, C&A adheres to a strict dual control principle in the approval process for all financial engagements.

The Code of Ethics and Conduct doesn't specifically name functions most at risk for corruption and bribery. Nevertheless, we acknowledge that departments with close contact with merchandise suppliers, such as the Sourcing Hubs in Asia, are potentially at a higher risk. However, strict measures are in place to mitigate these issues, such as the prohibition of offering or accepting bribes, the mandating of transparency, and encouraging

the reporting of suspicious conduct immediately. Additionally, specialized training is provided for these functions (see additional details below).

C&A's Management Board and the Supervisory Board are regularly informed about significant compliance cases, including incidents of corruption and bribery. This happens through meetings of the Supervisory Board. This process ensures that both administrative and supervisory bodies of the business are kept informed about any corruption or bribery-related incidents, allowing for necessary remedial and preventive actions to be taken promptly. Communication of such outcomes helps in maintaining transparency and reinforces our strong commitment to ethical 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 screensavers. In addition, every new C&A employee receives a copy of the Code of Ethics and Conduct.

For the global sourcing units there is a quarterly eNewsletter, available via the Sourcing Intranet, which includes regular articles published by the Integrity Department. The topics vary from reminders of the Code of Conduct and Ethics provisions to impending or recently completed training activities. The purpose of the newsletter is to maintain employees' awareness of integrity topics.

For the global sourcing units, ad-hoc cases and experiences are shared with specific teams or offices by

the Integrity Department, either upon request of their managers or initiated by the Integrity Department as needed.

The Integrity Department conducts ad hoc meetings with hub managers and business and functional heads to understand their risks and needs.

Additionally, regular reminders of C&A's Gifts & Entertainment policy are sent to C&A suppliers and factories.

## ANTI-CORRUPTION AND ANTI-BRIBERY TRAINING PROGRAMS

C&A provides a self-learning Code of Conduct and Ethics online training module which encompasses anticorruption and anti-bribery for C&A employees from the C&A EU Hubs, store leaders based in Europe, and the leaders from the European distribution centers. This module must be completed once and can be repeated on a voluntary basis at any time. This online self-training also must be completed by the members of C&A's management body, including executives and senior managers. However, there isn't separate anti-bribery or anti-corruption training designed specifically for managers.

For the global sourcing units, there are specific training activities which focus on anti-corruption and anti-bribery. These are:

- Integrity sessions face-to-face or via videocall, which cover topics like bribery, conflict of interest, gifts and entertainment, fraud, and whistle-blowing for new employees in sourcing.
- Integrity refresher sessions for all sourcing

employees every 18-24 months that review the topics of the onboarding integrity sessions.

- The Integrity Challenge to the global sourcing employees, which is in the form of an online scenario quiz including learning insights.

All merchandise suppliers and garment factories receive similar training, but with different perspectives and materials along with instruction on establishing their own integrity program. Required elements include:

- An Integrity session via videocall for new suppliers and garment factories, which must be completed once.
  - o A written confirmation of completion is required to be uploaded along with other business documents before a new supplier’s account can go live.
- Integrity refresher sessions for all suppliers and garment factories, which must be completed every 18-24 months.

A video presentation of a shortened version is hosted on the C&A online supplier area for all supplier onboardings.

## Progress Update/Actions

During May and June 2024, a self-learning training exercise was rolled out and assigned to all C&A employees in the Sourcing Hubs in Asia.

New employees who joined the Sourcing Hubs after June 2024 attended a dedicated training session, which was offered both in-person and virtually.

In parallel, the C&A employees from the EU Hubs, EU store leaders, and leaders of the European distribution centers were assigned an online self-learning training which covered the section of the C&A Code of Ethics and Conduct that focuses on anti-corruption, anti-bribery, and money laundering. This was part of the C&A self-learning Code of Conduct and Ethics online training.

### Incidents of corruption or bribery

In 2024, there was one confirmed incident related to contracts with business partners that were terminated or not renewed due to violations stemming from bribery. C&A immediately instructed the supplier not to process any further C&A orders in the production unit concerned. The supplier was given a warning of termination in case of further violations in one of its production units.

There were no public legal cases regarding corruption or bribery brought against the undertaking and its own workers.

METRIC	TOTAL
Number of convictions for violation of anti-corruption and anti-bribery laws (#)	0
Amount of fines for violation of anti-corruption and anti-bribery	0
Amount of fines for violation of anti-corruption and anti-bribery laws (EUR)	0
Amount of fines for violation of anti-corruption and anti-bribery laws (EUR)	0
Number of confirmed incidents in which own workers were dismissed or disciplined for corruption or bribery-related incidents	0
Number of confirmed incidents relating to contracts with business partners that were terminated or not renewed due to violations related to corruption or bribery	1

# Supplier Relations & Payment Practices

C&A aims to establish long-term relationships and strong collaboration within our supply chain. Building the necessary understanding between merchandise suppliers and C&A is an essential part of this process, which often translates to multi-year sustainability partnerships.

We recognize that timely and transparent payments are essential to maintaining strong, ethical partnerships with our suppliers. C&A is committed to fair and responsible payment practices across our supply chain with clear payment terms in place and a consistent focus on meeting agreed timelines to help support suppliers' financial stability.

We prioritize open communication with suppliers to address any payment issues promptly and equitably. These practices form part of our commitment to responsible purchasing practices as a member of ACT. Read more about ACT on [page 89](#) where we describe our Responsible Purchasing Practices Policy.

# ESRS Index Table



Our Sustainability Report 2024 has been guided by the European Sustainability Reporting Standard 2024 (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 improve our disclosures in the upcoming reporting periods, taking into consideration the revised ESRS requirements.

SECTION	ESRS STANDARD	DISCLOSURE REFERENCE	DISCLOSURE REQUIREMENT	SUSTAINABLE DEVELOPMENT GOALS	UN GUIDING PRINCIPLES	PAGES
General disclosures	General disclosures (ESRS 2)	BP-1	General basis for preparation			<a href="#">10</a>
		BP-2	Disclosures in relation to specific circumstances			<a href="#">10</a>
		GOV-1	The role of the administrative, management and supervisory bodies			<a href="#">14</a>
		GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies			<a href="#">15, 16</a>
		SBM-1	Strategy, business model, and value chain	SDG 16: Peace & Justice	UNGC Principles: 13, 14, 17, 18	<a href="#">11, 12, 13</a>
		SBM-2	Interests and views of stakeholders			<a href="#">16</a>
		SBM-3	Material impacts, risks, and opportunities and their interaction with strategy and business model			<a href="#">17, 18</a>
		IRO-1	Description of the process to identify and assess material impacts, risks, and opportunities			<a href="#">17</a>
		IRO-2	Disclosure requirements covered by the sustainability statements			<a href="#">18</a>
Environmental disclosures	Climate change (ESRS E1)	SBM-3	Material impacts, risks, and opportunities and their interaction with strategy and business model			<a href="#">24, 25</a>
		IRO-1	Description of the processes to identify and assess material climate related impacts, risks, and opportunities	SDG 7: Clean energy SDG 13: Protect the planet SDG 11: Sustainable cities and communities		<a href="#">24, 25</a>
		E1-3	Actions and resources in relation to climate change policies			<a href="#">27, 28, 31</a>
		E1-4	Targets related to climate change mitigation and adaptation			<a href="#">26</a>
		E1-6	Gross scopes 1, 2, 3 and total GHG emissions			<a href="#">32</a>



SECTION	ESRS STANDARD	DISCLOSURE REFERENCE	DISCLOSURE REQUIREMENT	SUSTAINABLE DEVELOPMENT GOALS	UN GUIDING PRINCIPLES	PAGES
Environmental disclosures	Pollution (ESRS E2)	IRO-1	Description of the processes to identify and assess material pollution-related impacts, risks and opportunities			<u>32</u>
		E2-1	Policies related to pollution	SDG 3: Good health and well-being		<u>33</u>
		E2-2	Actions and resources related to pollution	SDG 11: Sustainable cities and communities		<u>34</u>
		E2-3	Targets related to pollution			<u>34</u>
		E2-5	Substances of concern and substances of very high concern			<u>37-39</u>
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	SDG 12: Responsible Consumption SDG 11: Sustainable cities and communities		<u>43</u>
		E5-1	Policies related to resource use and circular economy			<u>44, 45</u>
		E5-2	Actions and resources relating to resource use and circular economy			<u>47-53</u>
		E5-3	Targets related to resource use and circular economy			<u>47, 50, 51, 53</u>
		E5-4	Resource inflows			<u>47</u>
		E5-5	Resource outflows			<u>54, 55</u>
Social disclosures	Own workforce (ESRS S1)	SBM-3	Material impacts, risks, and opportunities and their interaction with strategy and business model			<u>58, 59</u>
		S1-1	Policies related to own workforce	SDG 10: Reduced inequalities SDG 8: Good jobs and economic growth	UNGC principles: 15, 16, 19, 20, 22, 29, 30, 31	<u>60</u>
		S1-2	Processes for engaging with own workforce and workers' representatives about impacts	SDG 16: Peace & Justice		<u>63</u>
		S1-3	Processes to remediate negative impacts and channels for own workforce to raise concerns			<u>62</u>



SECTION	ESRS STANDARD	DISCLOSURE REFERENCE	DISCLOSURE REQUIREMENT	SUSTAINABLE DEVELOPMENT GOALS	UN GUIDING PRINCIPLES	PAGES
		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			<a href="#">64</a> , <a href="#">65</a>
		S1-6	Characteristics of our employees			<a href="#">66</a> , <a href="#">67</a>
		S1-9	Diversity metrics			<a href="#">68</a>
		S1-17	Incidents, complaints, and severe human rights impacts			<a href="#">63</a>
Social disclosures	Workers in the value chain (ESRS S2)	SBM-3	Material impacts, risks, and opportunities and their interaction with strategy and business model			<a href="#">70</a>
		S2-1	Policies related to value chain workers	UN SDG 8: Good jobs and economic growth	UNGC principles: 15, 16, 19, 20, 22, 29, 30, 31	<a href="#">72-75</a>
		S2-2	Processes for engaging with value chain workers about impacts			<a href="#">76</a>
		S2-3	Processes to remediate negative impacts and channels for value chain workers to raise concerns			<a href="#">75</a>
		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			<a href="#">77-79</a>



SECTION	ESRS STANDARD	DISCLOSURE REFERENCE	DISCLOSURE REQUIREMENT	SUSTAINABLE DEVELOPMENT GOALS	UN GUIDING PRINCIPLES	PAGES
Social disclosures	Consumers and end users (ESRS S4)	SBM-3	Material impacts, risks, and opportunities and their interaction with strategy and business model	SDG 3: Good health	UNGC principles: 15, 16, 19, 20, 22, 29, 30, 31	<u>80</u>
		S4-1	Policies related to consumers and end users			<u>81, 82</u>
		S4-2	Processes for engaging with consumers and end-users about impacts			<u>81</u>
		S4-3	Processes to remediate negative impacts and channels for customers and end-users to raise concerns			<u>81, 82</u>
		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			<u>81</u>
		S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities			<u>83</u>
Governance disclosures	Business conduct (ESRS G1)	G1-1	Business conduct policies and corporate culture	SDG 17: Partnerships for the goals	UNGC Principles: 29	<u>86-92</u>
		G1-2	Management of relationships with suppliers			<u>96</u>
		G1-3	Prevention and detection of corruption or bribery			<u>93, 94</u>
		G1-4	Confirmed incidents of corruption or bribery			<u>95</u>
		GOV-1	The role of the administrative, supervisory and management bodies			<u>87</u>

# Annex



## Energy Consumption and Mix (Own Operation)

ENERGY CONSUMPTION	2024
(1) Fuel consumption from coal and coal products (MWh)	0
(2) Fuel consumption from crude oil and petroleum products (MWh)	1,709
(3) Fuel consumption from natural gas (MWh)	55,685
(4) Fuel consumption from other fossil sources (MWh)	0
(5) Consumption of purchased or acquired electricity from fossil sources (MWh)	11,901
(6) Consumption of purchased or acquired heat, steam, and cooling from fossil sources (MWh)	68,317
(7) Total fossil energy consumption (MWh) (calculated as the sum of lines 1 to 6)	137,612
Share of fossil sources in total energy consumption (%)	34.30%
(8) Consumption from nuclear sources <sup>1</sup> (MWh)	13,425
Share of consumption from nuclear sources in total energy consumption (%)	3.30%
(9) Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh)	0
(10) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh) <sup>2</sup>	249,819
(11) The consumption of self-generated non-fuel renewable energy (MWh)	0
(12) Total renewable energy consumption (MWh) (calculated as the sum of lines 9 to 11)	249,819
Share of renewable sources in total energy consumption (%)	62.30%
Total energy consumption (MWh) (calculated as the sum of lines 7, 8 and 12)	400,856

1) Related to consumption of purchased or acquired electricity

2) Includes 241,669 MWh of renewable electricity plus a share of renewable energy from the grid mix

## Scope 3 GHG emissions categories included in the GHG inventory

REPORTING CATEGORY	CATEGORIES
Scope 3, Category 1	Purchased goods and services
Scope 3, Category 3	Fuel and energy related activities
Scope 3, Category 4	Upstream transportation and distribution
Scope 3, Category 5	Waste generated in operations
Scope 3, Category 6	Business travel
Scope 3, Category 7	Employee commuting
Scope 3, Category 9	Downstream transportation and distribution
Scope 3, Category 11	Use of sold products
Scope 3, Category 12	End of life treatment of sold products

## Scope 3 GHG emissions categories included in the GHG inventory

REPORTING CATEGORY	EVALUATION STATUS	EXPLANATION
Scope 3, Category 1	Not relevant	Purchased garment data for 3rd party suppliers (suppliers that (1) offer a special collection to C&A, which products do not contain C&A labelling, (2) do not report stock in C&A books, or (3) do not have production traceability and a PU account setup in SMS (Supplier Management System) and dummy suppliers (recorded orders in the system with no actual production) have been excluded from the analysis because these lines were determined not to be relevant for embedded carbon accounting by C&A.
Scope 3, Category 2	Included in Category 1	Due to data limitations, and consistent with GHGP guidelines, capital goods & services were not able to be broken out and were included in Category 1. As such, the reporting category is excluded but the associated emissions were not excluded.
Scope 3, Category 8	Not relevant	Upstream leased assets are not applicable in C&A's business.
Scope 3, Category 10	Not relevant	Not relevant because there is no downstream processing of sold fashion.
Scope 3, Category 13	Not relevant	Not relevant because C&A does not act as a lessor.
Scope 3, Category 15	Not relevant	C&A does not have significant investments as part of its core business.

## Percentage of GHG Scope 3 emissions calculated using primary data

REPORTING CATEGORY	SCOPE 3 CATEGORY	EVALUATION STATUS	EMISSIONS CALCULATION METHODOLOGY	% OF EMISSIONS CALCULATED USING DATA OBTAINED FROM SUPPLIERS OR VALUE CHAIN PARTNERS	EXPLANATION
Scope 3, Category 1	Purchased goods and services	Relevant, calculated	"Hybrid method Spend-based method"	2.0%	<p>"Emissions were calculated using a custom hybrid life cycle assessment model and database for 100% of procured direct (fashion related materials and products) and indirect (non-fashion) goods and services over the reporting period.</p> <p>All values represent cradle-to-vendor-gate emissions across all GHG emissions identified in the GHG Protocol Value Chain Standard, using GWP values from the IPCC Fifth Assessment Report.</p> <p>Purchased goods and services refers to all procured direct materials, material processing and manufacturing of fashion products as well as spend on all non-capital products and services not directly linked to sold products (indirect spend).</p> <p>Emissions estimates for this Scope 3 category were calculated using procurement and inventory data in a hybrid LCA model, using a spend based analysis for indirect spend and a bottom up, mass based unit process LCA approach, modeled at the item level, for the entire fashion inventory. The fashion inventory data also included some supplier-specific emissions data. These supplier specific emissions were substituted for the appropriate supplier and activity emissions built using the LCA approach."</p>
Scope 3, Category 11	Use of sold products	Relevant, calculated	Methodology for indirect use phase emissions, please specify	0.0%	<p>"Emissions resulting from the use of sold products were calculated for washing and drying activities associated with the use of apparel products over the average lifetime of the product. Product lifetimes were determined in accordance with a consumer use survey conducted by C&amp;A in 2018 and peer-reviewed literature values based on average total number of wears for a product category, e.g., t-shirts, pants, etc. and the number of wears per wash. Wears per wash were derived from survey data specific to country or region in which the product was sold. Sales region also dictated the wash water temperature and drying method.</p> <p>Use of sold products in apparel refer to the energy use associated with washing, drying, and other relevant activities performed on apparel products between uses."</p>
Scope 3, Category 4	Upstream transportation and distribution	Relevant, calculated	Distance-based method	98.0%	<p>Primary cargo mass, transport mode, and distance were provided by the company's logistics vendors for both inbound and outbound transportation. Inbound and outbound emissions were then quantified by multiplying the provided t-km by emission factors (kg CO<sub>2</sub>e per t-km transport) provided by the logistics vendors. Truck transportation from Asian production units to outbound port were estimated using a spatial model.</p>
Scope 3, Category 7	Employee commuting	Relevant, calculated	Average data method	0.0%	<p>For standard commuting, emissions were estimated using the total number of employees, an assumed breakdown of commuting patterns (mode and distance) based on American Community Survey Reports published by the U.S. Census Bureau and average emissions factors for U.S. automobiles and mass transit from WRI's GHG Protocol Calculation Tools.</p>
Scope 3, Category 12	End of life treatment of sold products	Relevant, calculated	Waste-type-specific method	0.0%	<p>"End of life treatment emissions were calculated according to the total mass of sold product in a particular region. A mix of waste management facility types, e.g., landfill, incineration, etc. were used for each country or region in which the products were sold. Primary data were not available for reuse/recycling, so an assumed 11% of sold products were either recycled or put another use.</p> <p>Primary data is not available for this category. As such, best available assumptions were used to estimate the fate of sold products and associated emissions."</p>

REPORTING CATEGORY	SCOPE 3 CATEGORY	EVALUATION STATUS	EMISSIONS CALCULATION METHODOLOGY	% OF EMISSIONS CALCULATED USING DATA OBTAINED FROM SUPPLIERS OR VALUE CHAIN PARTNERS	EXPLANATION
Scope 3, Category 3	Fuel-and-energy-related activities	Relevant, calculated	Fuel-based method	0.0%	<p>"Emissions were calculated using data from the company's energy consumption across owned and operated facilities. Location- and Market- based emissions factors at the regional level were derived using regional fuel mix and T&amp;D losses reported by multiple sources, including the latest datasets from the International Energy (IEA) Agency and the Association of Issuing Bodies (AIB).</p> <p>Values were calculated using GWP values from the IPCC Fifth Assessment Report and represent upstream emissions from the production and transportation of fuels consumed by the company in the reporting year as well as T&amp;D losses associated with electricity use."</p>
Scope 3, Category 5	Waste generated in operations	Relevant, calculated	Spend-based method	0.0%	Emissions were calculated using an economic input-output life cycle assessment approach for 100% of waste expenditures data over the reporting period. All values represent cradle-to-gate emissions across all GHG emissions identified in the GHG Protocol Value Chain Standard and GWP values from the IPCC Fifth Assessment Report.
Scope 3, Category 9	Downstream transportation and distribution	Relevant, calculated	Distance-based method	100.0%	Primary cargo mass, transport mode, and distance were provided by the company's logistics vendors for all post sale, direct-to-customer eCommerce shipments. Downstream transportation emissions were then quantified by multiplying the provided t-km by emission factors (kg CO <sub>2</sub> e per t-km transport) provided by the logistics vendors.
Scope 3, Category 6	Business travel	Relevant, calculated	Spend-based method	0.0%	Emissions were calculated using an economic input-output life cycle assessment approach for 100% of business travel expenditures data over the reporting period. All values represent cradle-to-gate emissions across all GHG emissions identified in the GHG Protocol Value Chain Standard and GWP values from the IPCC Fifth Assessment Report.
Scope 3, Category 2	Capital goods	Relevant, calculated	Spend-based method	0.0%	Emissions were calculated using an economic input-output life cycle assessment approach for 100% of capital expenditures data over the reporting period. All values represent cradle-to-gate emissions across all GHG emissions identified in the GHG Protocol Value Chain Standard and GWP values from the IPCC Fifth Assessment Report.
Scope 3, Category 13	Downstream leased assets	Not relevant, explanation provided		0.0%	Not relevant because the company does not act as a lessor.
Scope 3, Category 14	Franchises	Not relevant, explanation provided		0.0%	Not relevant because the company does not have franchises.
Scope 3, Category 15	Investments	Not relevant, explanation provided		0.0%	The Company does not have significant investments as part of its core business.
Scope 3, Category 10	Processing of sold products	Not relevant, explanation provided		0.0%	Not relevant because there is no downstream processing of sold fashion.
Scope 3, Category 8	Upstream leased assets	Not relevant, explanation provided		0.0%	Upstream leased assets are not applicable in the Company's business.

From emission accounting perspective, all biogenic emissions available in the accounting models have been accounted for and are included in our emission inventory

### Scope 3 GHG emissions categories included in the GHG inventory

ENERGY ACCOUNTING TYPE	LOCATION	MARKET	NEITHER
Reporting Category	Total GHG Emissions	Total GHG Emissions	Total GHG Emissions
Scope 1			11,502
Scope 2	75,136	7,718	9,706
Scope 3, Category 1			2,012,710
Scope 3, Category 3	22,155	7,886	6,686
Scope 3, Category 4			130,636
Scope 3, Category 5			3,179
Scope 3, Category 6			269
Scope 3, Category 7			37,234
Scope 3, Category 9			492
Scope 3, Category 11			269,180
Scope 3, Category 12			14,909
Total	97,291	15,603	2,496,501

# Contact & Imprint

# Legal Contact

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