

# INDITEX

Safe to Wear

2024

# Index - Table of contents

I. Definition of Safe to Wear	3
II. Flammability	5
III. Mechanical Safety	7
III.1 Cords, Drawstrings and Loops	8
III.2 Components, Materials and Construction	9
IV. Metal Detection Policy	10
V. EU Regulation of mandatory application	12
Annex I: Specific country requirements	14
Annex II: Commitment to comply with Inditex's Group Safe to Wear product safety standard	17

# I. Definition of Safe to Wear

# Definition of Safe to Wear

Safe to Wear is defined as a product safety standard that:

- Has been developed by Inditex in conformity with the most stringent legislation on product safety.
- Regulates flammability requirements and product features which, if they are in the product, could present hazards for safety, such as: entrapment, strangulation, tripping, choking, cuts and puncture wounds.
- Lastly, Safe to Wear includes the General Product Safety Directive (hereinafter, GPSD) as the EU regulation of mandatory compliance for all Inditex suppliers.

Safe to Wear (hereinafter, STW) is of general and mandatory application for all clothing, home textiles and bedding items, fabrics and leather products and certain accessories such as belts, handbags, kerchiefs, scarves, imitation jewellery and similar products.

The responsibility of the manufacturers and/or suppliers for guaranteeing compliance with the products supplied to Inditex with STW does not exempt them from complying with any other law or act that applies to these articles, even if it is not specifically included in this Standard. For more information about the commitment to comply with this standard see Annex II.

Products not included in the scope of this standard are, among others: footwear, toys, sunglasses, watches, food contact articles, carpets, curtains, home fragrances and candles, electrical and electronic devices, cosmetic and cleaning products, household products (non-textile), decorative items, furniture, cots, high chairs, bassinets and any other kind of article supplied to Inditex.

The exclusion of other articles does not exclude the compliance with any applicable law or regulation and/or certain specific standards of Inditex group for such articles. For more information and for the resolution of doubts, refer to the buyer of the article and/or to the Sustainability Department of Inditex through [stw@inditex.com](mailto:stw@inditex.com).

The supplier is responsible for the compliance of the products supplied to Inditex with STW.

Apart from supplier mandatory obligation to control product's parameter compliance with STW, and regardless of the commitment accepted by the supplier to control the parameters regulated in STW, Inditex will assess that compliance at any phase of the manufacturing process, by carrying out "Routine" and "Random Sample" analysis on determined "Model/Quality" at any point of their "Production Cycle".

## II. Flammability

## Flammability

Flammability is defined as the ability of a material or product to ignite and burn with a flame under specified conditions. Fabric flammability performance is mainly classified according to flame spread speed and the way of the base fabric burns. By definition, any material capable of burning with a flame is considered flammable. All fiber types commonly used in clothing are capable of burning with a flame, so are flammable.

Burning with a flame is a highly complex process which in its simplest can be considered to require three things to come together: fuel, oxygen and the source of ignition. For textiles, the material itself is the fuel, oxygen will always be present and the source of ignition will usually be an external source of heat or a flame. However, in practice a wide range of parameters influence burning behaviour or flammability performance; for textiles these include:

- the chemical composition and physical properties of the fibers,
- the geometric configuration of the fibers and yarn,
- the surface characteristics of the fabric,
- the characteristics of any applied chemical finishes.

The design and construction of the garment will also have a great impact on its flammability performance, for example garments with tassels, fringes or feathers. This should be considered as part of garment safety assessment along with the potential impact of any non-textile materials and components.

The greatest flammability hazard arises when a particular material configuration and composition can be ignited and is consumed in the shortest time.

As all textiles will burn, Inditex's goal is to sell garments made from the safer fabrics, that is those which ignite less readily and burn more slowly or self-extinguish, and comply with product safety requirements globally.

### Inditex global requirements

	SCOPE	REQUIREMENTS	TEST METHOD
Daywear - Adult clothing (> 14 years)	Plain surface fabric	trip thread severed > 5 s.	
	Raised surface fabric	trip thread severed > 7 s.	
Daywear - Children clothing (up to 14 years)	Plain surface fabric	trip thread severed > 7 s.	16CFR 1610.6
	Raised surface fabric		ASTM D 1230
Nightwear - Adult clothing (> 14 years)	Plain surface fabric	trip thread severed > 5 s.	
	Raised surface fabric	trip thread severed > 7 s.	
Nightwear - Children clothing (up to 14 years)	Bathrobes, dressing gowns, pyjamas, nightdresses, night shirts, sleepsuits	trip thread severed 520mm > 15 s. and No surface flash	EN 14878 (EN 1103)
Bedding items - Children and adult	Items intended to be placed on a mattress (sheets, bedspreads, duvets, duvet covers, quilts, mattress covers, blankets, pillows, pillow cases, cushions, cushion covers among others)	Non ignition	EN ISO 12952-1
Bedding items - Babies (from birth up to 36 months)	Sleep bags	No surface flash	EN 16781 (EN 1103)
	Cot duvets	No surface flash	EN 16779-1 (EN 1103)
	Cot duvets covers	No surface flash	EN 16779-2 (EN 1103)

For specific country requirements, please see Annex I.

### III. Mechanical Safety

### III.1 Cords, Drawstrings and Loops

Certain features of the design of garments may present entrapment, strangulation and similar hazards, based on its dimension and position in the garment. Such features include drawstrings, decorative or functional cords, adjusting tabs, tied belts, sashes, different type of loops, shoulder straps and ties, among others.

The level of risk is largely determined by the position on the garment of these features and their length or size.

Specifications for these garment features are given in relation to where they will be on the body in wear:

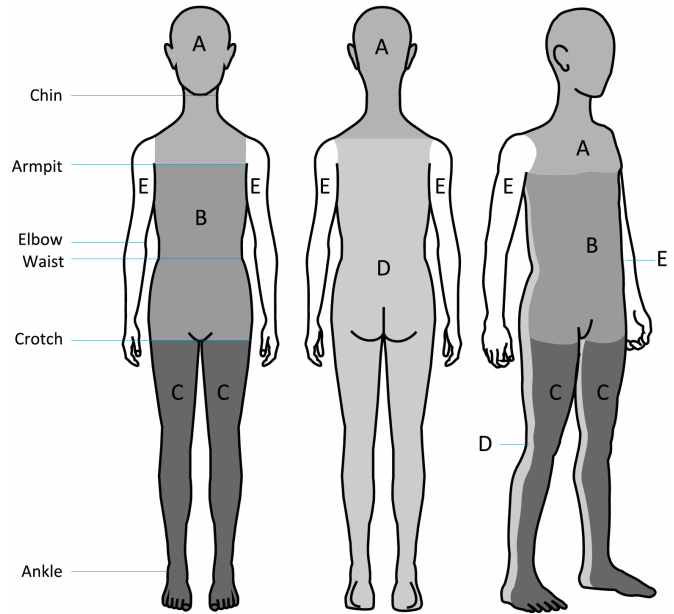
A - head, neck and upper chest area

B - chest and waist area

C - below crotch area

D - back area

E - arms (sleeves) area



Cords, drawstrings and loops on children’s clothing have been implicated in several fatalities in the past. National accident statistics show that there are many different accidents depending, among others, on the position of the feature and the age and behaviour of the wearer.

This risk shall be considered and evaluated in all garments intended to be worn by children from birth up to 14 years. The hazards presented by particular garment features are also influenced by the behaviour of the wearer which in turn is mainly governed by their age. A feature that presents no hazard to an adult may be a significant hazard for a young child as they obviously behave differently. Specifications are therefore also related to wearer’s age and are applied to garments according to the age of the wearer for which the garment is intended.

#### Inditex global requirements

SCOPE	REQUIREMENTS	TEST METHOD
Children clothing (up to 14 years)	EN 14682	
Bedding items - Babies (from birth up to 36 months)	Sleep bags	EN 16781
	Cot duvets	EN 16779-1
	Cot duvets covers	EN 16779-2

For specific country requirements, please see Annex I.



## III. 2 Components, Materials and Construction

Features and components of garments may present a hazard of choking, aspiration or ingestion, cuts, abrasion, etc. Such features include small parts, security of attachment of components (buttons, press fasteners, rivets, sequins etc.), sharp edges and points. It is therefore essential that all such components on clothing, specially for babies (from birth up to 36 months of age) are sufficiently secure and that they remain so throughout the reasonably foreseeable period of use of the garment.

A removable part is any component or accessory which is intended to be capable of being separated from the garment. A small part is defined as any component or pieces of components which can fit entirely into the standard small part cylinder - which addresses objects small enough to be able to enter the child's lower throat- without compressing and in any orientation. Many of the components attached to garments will of themselves be small parts if they were to be separated from the garment.

Small parts present hazards associated with choking, aspiration, ingestion (swallowing) etc, and also insertion into eyes, nose or ears. The consequences of these hazards are generally serious for babies (from birth up to 36months). For this reason small parts are regulated in a wide range of products for this age group.

These requirements are designed to minimise these hazards by specifying performance criteria which must be achieved under testing, together with guidance on the processes used in production and through the supply chain. The requirements are mandatory for all garments intended by design, production or selling route to be worn by babies (from birth up to 36 months of age), while certain aspects are also required for garments intended to be worn by children up to 14 years of age. On the other hand, adult wearers are considered to be able to recognise many of the hazards or their behaviours do not expose them to the risks in the same way as for children. Hence, most of these hazards are not regulated in adult's products and mainly have quality implications.

### Inditex global requirements

PARAMETER	SCOPE	REQUIREMENTS	TEST METHOD
<b>Small parts</b>	Babies (from birth up to 36 months)	Buttons	EN 17394-2 ITX tension test
	Babies (from birth up to 36 months)	Snaps/press fasteners	Removal force > 70 N TS 17394-3 ITX tension test
	Babies (from birth up to 36 months)	Other grippable components (i.e. zipper pullers)	ITX tension test
	Babies (from birth up to 36 months)	Non grippable components: sequins, rhinestones, glitter...	No change or Negligible change TS 17394-4
	Babies (from birth up to 36 months)	Rotating components rigidly mounted (i.e. zipper pullers)	0,45 Nm 16 CFR 1500.51 & 52 (e)
<b>Sharp points</b>	Babies (from birth up to 36 months)	Accessible points or edges (as received and after small parts test)	Maximum penetration under test = 0,5 mm 16 CFR 1500.48
	Children (from 36 months up to 14 years)	Accessible points or edges (as received)	
<b>Sharp edges</b>	Babies (from birth up to 36 months)	Accessible points or edges (as received and after small parts test)	Maximum cut length < 13 mm 16 CFR 1500.49
	Children (from 36 months up to 14 years)	Accessible points or edges (as received )	

For specific country requirements, please see Annex I.

# IV. Metal Detection Policy

# Metal Detection Policy

## Definition and Scope

The Metal Detection Policy (hereinafter, the Policy) has been created by Inditex with the objective to protect the health and safety of our customers. The Policy has been developed to ensure that all textile and leather products supplied to Inditex by any supplier do not contain any metallic item that may cause any injury if present in the product, such as needles, pins, staples or any other sharp metallic element.

This Policy is of general and mandatory application for all textile and leather products supplied to Inditex, with special attention to children's products. Its scope includes, among others, articles such as clothing, accessories and home textiles.

## Commitments of the suppliers

Inditex suppliers are committed to:

- Select a responsible supply chain that has been approved by Inditex.
- Inform in an accurate, precise and appropriate manner about the supply chain for every purchase order.
- Guarantee that all products supplied to Inditex do not contain any needle, pins, staples or any other metallic element that may caused an injury to the consumer.
- Establish corresponding internal procedures and preventive controls in order to comply with this Policy for all products supplied to Inditex within the scope of this Policy.
- Ensure that all articles within the scope of this Policy, as well as their packaging, are 100% ferrous free.
- Disclose and ensure that all Inditex requirements are well-known by all parties involved in the whole supply chain.

## Evaluation and monitoring by Inditex

Inditex reserves the right to check and assess the compliance with this Policy by:

- The revision and verification of the different facilities used in every purchase order by the supplier.
- Carrying out STW initial and/or follow-up audits.
- Visiting those facilities for on-site product inspection.
- Controlling products supplied to Inditex as a part of an Inditex internal control or verification.

Suppliers are committed to provide to Inditex and/or third companies acting on Inditex's behalf, all required documentation and facilitate access to all facilities in order to supervise the level of compliance with this Policy.

It will be consider a serious non-compliant of this Policy:

- The use of a non-approved facility under the scope of this Policy.
- The lack of metal detector machine in those applicable manufacturing processes.
- The use of defective control elements that could not ensure the minimum control conditions.
- The presence of uncontrolled needles during the manufacturing process.
- The lack of a broken needle control procedure.
- The lack of a free metal zone in the facility.
- The presence of a needle or any other metallic foreign object in any of the products supplied to Inditex.
- Not facilitate the access to external auditors and/or Inditex personnel to the facility.

# V. EU Regulation of mandatory compliance

# General Product Safety Directive

## What is it?

EU Directive 2001/95/EC of the European parliament and of the council of 3 December 2001 on general product safety - General Product Safety Directive, hereinafter GPSD.

## Is it of mandatory compliance?

The GPSD is mandatory for all suppliers that manufacture, distribute and/or supply products imported or commercialized into European Union member States, and requires producers to place only safe products on the market. A safe product means any product which, under normal or reasonably foreseeable conditions of use, does not present any risk or only the minimum risks compatible with the product's use for the life time of the product.

The GPSD does not replace product specific regulations, but it does apply where it goes further than the existing regulations in terms of the specific aspects of safety covered.

Specific safety requirements or "acceptable risk" are not defined within this Directive. It is the responsibility of the manufacturer, retailer, importer etc. to decide and lay down such requirements. A product is presumed to conform to the general safety requirement if it is in compliance with the appropriate European and national legislation or standards. Where no specific European and national legislation or standards exist, product safety shall be assured by Risk Assessment taking into account voluntary national standards, Commission recommendation, guidelines, or product safety codes of good practice when available.

According to the GPSD, producers and distributors shall provide consumers with the relevant safety information to enable them to assess the risk inherent in a product, as well as to act with due care to ensure compliance with the applicable safety requirements for all products placed on the market.

The GPSD also places a requirement on producers and distributors, when they become aware that a product is incompatible with the general safety requirement, to notify an enforcement authority in writing of the fact and to take action to prevent risk to the consumer. Within the limits of his activities, a person who is a producer or a distributor shall co-operate with an enforcement authority (at the enforcement authority's request) in action taken to avoid the risks posed by a product which he supplies or has supplied.

Therefore, suppliers are required to inform Inditex Sustainability Department immediately if for any reason they become aware that a product supplied by them may be unsafe. Such reasons may include, but are not limited to:

- any factory control processes are found to have failed,
- similar product is subject to safety concerns,
- any product made in their factory is involved in a safety incident.

Suppliers are also required to co-operate with Inditex in the provision of all necessary information in the event of a safety concern arising from any of the products they supply.

# Annex I: Specific country requirements

PARAMETER	SCOPE	REQUIREMENTS	TEST METHOD	COUNTRY EXCEPTIONS	
<b>Flammability</b>	Daywear - Adult clothing (> 14 years)	Plain surface fabric	trip thread severed > 5 s.	16CFR 1610.6	Sweden - ASTM D 1230 (3 s. flame)
		Raised surface fabric	trip thread severed > 7 s.		
	Daywear - Children clothing (up to 14 years)	Plain surface fabric	trip thread severed > 7 s.	ASTM D 1230	
		Raised surface fabric			
	Nightwear - Adult clothing (> 14 years)	Plain surface fabric	trip thread severed > 5 s.		Sweden - ASTM D 1230 (3 s. flame)
		Raised surface fabric	trip thread severed > 7 s.		The Netherlands - EN 1103 (5 s. flame)
	Nightwear - Children clothing (up to 14 years)	Bathrobes, dressing gowns, pyjamas, nightdresses, night shirts, sleepsuits	trip thread severed 520mm > 15 s. and No surface flash	EN 14878 (EN 1103)	USA - 16 CFR 1615, 16 CFR 1616
					Canada - SOR/2016-169 Australia, New Zealand - AS/NZ 1249 UK - BS 5722
	Bedding items - Children and adult	Items intended to be placed on a mattress (sheets, bedspreads, duvets, duvet covers, quilts, mattress covers, blankets, pillows, pillow cases, cushions, cushion covers among others)	Non ignition	EN ISO 12952-1	UK - Fire regulation 1988
					China - GB/ T 33734 Canada - SOR/2016-194
Bedding items - Babies (from birth up to 36 months)	Sleep bags	No surface flash	EN 16781 (EN 1103)	China - GB 31701 Canada - SOR/2016-194 AS/NZ 1249	
	Cot duvets	No surface flash	EN 16779-1 (EN 1103)	China - GB/T 33734	
	Cot duvets covers	No surface flash	EN 16779-2 (EN 1103)	Canada - SOR/2016-194	

PARAMETER	SCOPE	REQUIREMENTS	TEST METHOD	COUNTRY EXCEPTIONS
<b>Cords, drawstrings, loops</b>	Children clothing (up to 14 years)	EN 14682	Visual inspection and measurement control	China - GB 31701 USA - ASTM F1816
	Bedding items - Babies (from birth up to 36 months)	EN 16781		China - GB 31701
	Cot duvets	EN 16779-1		China - GB/ T 33734
	Cot duvets covers	EN 16779-2		
<b>Sharp points</b>	Children (from 36 months up to 96 months) Accessible points or edges (after small parts test)	Maximum penetration under test = 0,5 mm	16 CFR 1500.48	USA - 16 CFR 1500.53 (e),(f)
<b>Sharp edges</b>		Maximum cut length < 13 mm	16 CFR 1500.49	



# Annex II: Commitment to comply with Inditex Group's Safe to Wear product safety standard

# Annex II: Commitment to comply with Inditex Group's Safe to Wear product safety standard

I hereby confirm that:

- 1) We have received the Safe to Wear (hereinafter, STW) product safety standard, we have read it and thoroughly understand its implications.
- 2) We acknowledge that compliance with STW is a contractual obligation and undertake, accordingly, to meet the STW requirements in all orders involving production, marketing or distribution placed by any of the formats of the Inditex Group.
- 3) We undertake to disclose and formally demand STW implications to the whole production line.
- 4) The Inditex Group:
  - Reserves the right to check: i) compliance with STW regarding any goods supplied, by any method, at any time, and/or at any stage of the production, marketing or distribution processes, and ii) the appropriate disclosure of STW.
  - Reserves the right to cancel any order for any goods where a non-compliance with STW regarding any test and/or inspection has been established.
  - Reserves the right to return any orders already delivered where a non-compliance with STW regarding any test and/or inspection has been established.
  - Reserves the right to cancel or destroy, or to order destruction of the goods subject to the cancelled order, subject to the fact that the cancellation of the relevant order shall entail the non existence of the obligation to pay any sum whatsoever for the goods failing to comply with STW.
  - Holds the supplier as solely responsible for any and all damages caused by goods failing to comply with STW.
- 5) We acknowledge that approval of a "sample" and any subsequent "repetition" of goods by the INDITEX Group do not release us from our liability, for the entire production, marketing and distribution processes.

**THE SUPPLIER IS RESPONSIBLE FOR ALWAYS REFERRING TO THE LATEST UPDATED VERSION OF THIS DOCUMENT, AVAILABLE AT [www.inditex.com](http://www.inditex.com).**

# INDITEX

Product Sustainability

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