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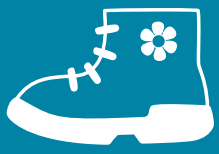

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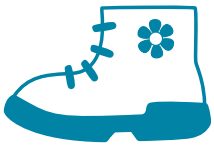

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I. DEFINITION OF safe to wear for children's footwear

I. DEFINITION OF safe to wear for children´s footwear

safe to wear for children´s footwear **is defined as a product safety standard that:**

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

safe to wear for children´s footwear is of general and mandatory application for all children´s footwear supplied to Inditex.

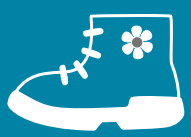
The responsibility of the manufacturers and/or suppliers for guaranteeing compliance with the products supplied to Inditex with safe to wear for children´s footwear does not exempt them from complying with any other Law or Act that applies to these articles, even if it is not specifically included in this Standard.

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 purchaser of reference and/or to the Sustainability Department of Inditex through stw_footwear@inditex.com.

The Supplier is responsible for the compliance of the products supplied to Inditex with safe to wear for children´s footwear.

Lastly, and regardless of the commitment accepted by the Supplier to control the parameters regulated in this Standard , Inditex will verify its correct implementation at any phase of the manufacturing process of those products that are manufactured, commercialized and/or distributed by it, by carrying out “Routine” and “Random Sample” analysis on determined “Models/Quality” at any point of their “Production Cycle”.

II. REFERENCE MANUAL



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II. REFERENCE MANUAL

A. MECHANICAL SAFETY: CORDS, LACES, DRAWSTRINGS, STRAPS AND LOOPS

1. What are they?

Features of the design of footwear to effect closure, to secure the footwear to the foot or provide a grippable element. Such features include shoe laces, drawstrings, ties, adjusting tabs, straps and thongs, loops, grip tabs/loops and decorative cords. These features may also be present for decorative purposes only.

2. Where is the risk?

Shoe laces, drawstrings and loops may be found in all footwear intended to be worn by children from birth up to 7 years of age and may present entrapment, tripping or similar hazards.

Footwear should be risk assessed and specific limitations on size, length and position on certain footwear applied to mitigate the risk.

Cords, drawstrings and loops may be found on shoe bags sold together with the footwear and present a strangulation hazard for children if mis-used.

3. How are they regulated?

- 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
  - UNE 59300:2017 Footwear. Safety requirements for infants' and children's footwear. Physical and mechanical properties. Specification and test methods.

4. How are they analysed?

It is analysed by visual inspection and testing against criteria specified in:

- UNE 59300:2017 Footwear. Safety requirements for infants' and children's footwear. Physical and mechanical properties. Specification and test methods

and/or by

- GPSD Risk assessment.

For more detailed information please see Annex I: Guide to Footwear Safety.

5. What are the acceptable limits?

Footwear features such as shoe laces, drawstrings, cords, loops, ties, adjusting tabs etc (both functional and decorative) are limited in length (and certain aspects are not permitted) depending on the age of the wearer:

All footwear intended for children up to age 7 years (up to size 34)	
Functional cords with free ends, such as shoe laces and drawstrings.	Three-dimensional embellishments or knots (including toggle clamps) are not permitted. Ends must be protected to avoid fraying (for example, by heat sealing, stitches or aglet).
Functional cords with free ends, such as shoe laces and drawstrings, except where the closure is not made on the footwear (for example, footwear like romans and espadrilles where the length limitation would impair functionality).	The length of the free end must not be greater than: - 270 mm for footwear up to size 18 - 300 mm for shoes from size 19 to size 24 - 320 mm for shoes from size 25 to size 34 *See Annex I Guide for how to measure*
Cords without free ends, typically secured by toggle clamps.	No protruding loop when open to its largest, Loop not to measure more than 150 mm when fully closed, Loop must not hang below the sole / touch the ground in wear.
Decorative cords and accessories with free ends or forming loops.	Free end / perimeter of loop must not measure more than 75 mm and must not hang below the sole / touch the ground in wear.
Loops (including grip tabs) at the back of footwear.	Must be completely flat to the footwear or have a perimeter less than 50 mm (so that there is no risk of entrapment). Must not hang below the sole / touch the ground in wear.
Functional and decorative pullers on zip fasteners (functional and decorative).	Not measure more than 75 mm and not hang below the sole/ touch the ground in wear.
Adjusting tabs, sandal straps (with or without buckles) and similar closing device.	Free end not to measure more than 75 mm when footwear is fully closed. Must not reach the ground in wear.
Bags used to contain shoes included as a set.	Bags must be made of an air permeable material or have perforations. If the opening perimeter is greater than 380 mm the bag must not have a drawstring or cord closure system. Alternative closures should be risk assessed.

6. How can it be avoided?

By producing footwear designs that comply with UNE 59300 and controlling production variation, such that critical parameters are not exceeded.

For a more detailed information please see Annex I: Guide to Footwear Safety.

B. MECHANICAL SAFETY: COMPONENTS, MATERIALS & CONSTRUCTION

1. What is it?

Features and components of footwear. Such features include small parts, parts that are subject to be release if their security of attachment is inadequate, and other components like buttons, press fasteners, rivets, sequins, etc., which may have sharp edges and points, and sewing thread ends and other manufacturing remnants.

Foreign objects, that is, items that should not be present in the footwear that may present a hazard such as needles, pins, loose components, etc.

2. Where is the risk?

These features are found in all footwear for functional purposes or for decoration. Foreign objects can be present as a result of manufacturing processes or contamination.

In footwear intended to be worn by babies or children under 36 months they present a hazard of choking, aspiration or ingestion, cuts and piercing, etc. Certain aspects are also of concern for footwear intended to be worn by children up to 14 years of age. Requirements vary according to the age of the wearer.

Consideration of these hazards should also be applied to adult footwear, but the strict requirements are not directly applied as adults are considered to be able to recognise the risk or are less likely to be harmed.

3. How are they regulated?

- 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
  - UNE 59300:2017 Footwear. Safety requirements for infants' and children's footwear. Physical and mechanical properties. Specification and test methods
- GB 30585:2014 Safety Technical Specifications for Children's Footwear
- GB 20536:2010 Children's canvas rubber footwear
- United States of America CPSA: 16 CFR II Consumer Products Safety Improvement Act 2008. CHAPTER II Consumer Product Safety Commission
  - 16 CFR II, Subchapter C, Part 1500 Hazardous Substances and Articles; Administration and Enforcement Regulations

4. How are they analysed?

It is analysed by visual inspection and testing against criteria specified in:

- UNE 59300:2017 Footwear. Safety requirements for infants' and children's footwear. Physical and mechanical properties. Specification and test methods
- 16 CFR 1500, 16 CFR 1501

and/or by

- GPSD Risk assessment.

For a more detailed information please see Annex I: Guide to Footwear Safety.

5. What are the acceptable limits?

Requirements and testing vary depending on the type of footwear and the age of the wearer.

Removable Parts

Small parts test:

Scope	Footwear for babies and infants up to 36 months
Application	Removable parts are any component or accessory which is intended to be capable of being separated from the footwear. Examples include stickers, badges, etc.
Age of wearer	Up to age 36 months
Standard(s)	UNE 59300, CFR 1500
Test Method	UNE 59300 Small Parts Test / CFR 1501
Requirement	Removable parts must not be small parts - Items must not fit entirely within the test cylinder.

Durability of removable rigid parts:

Scope	Footwear for babies and infants up to 36 months
Application	Removable rigid parts are any component or accessory which is intended to be capable of being separated from the footwear. Examples include stickers, badges, etc.
Age of wearer	Up to age 36 months
Standard(s)	UNE 59300, 16 CFR 1500
Test Method	UNE 59300 Torque Test & UNE 59300 Traction Test & UNE 59300 Small Parts Test & UNE 59300 Sharp points test & UNE 59300 Sharp Edges Test
Requirement	When subjected to torque and traction testing removable parts must not produce parts that are small parts, have sharp points or sharp edges.

Attached Components - grippable

Resistance to pulling:

Scope	Footwear for babies and infants up to 36 months
Application	To any component that is attached, not intended to be removable, and would if detached constitute a small part (Small Parts Test): examples include sewn buttons, snap fasteners (rivets, eyelets, etc.), “nail” snaps, buckles, hooks, plastic items (aglets, injected closures, heat-sealed plastics) , zippers, ornaments, etc.
Age of wearer	Up to age 36 months
Standard(s)	UNE 59300, 16 CFR 1500, GB 30585
Test Methods	UNE 59300, 16 CFR 1500
Requirement	Minimum removal force 70 N

Resistance to twisting (torque):

Scope	Footwear for babies and infants up to 36 months
Application	To any component that is attached, not intended to be removable, and would if detached constitute a small part (Small Parts Test): examples include sewn buttons, snap fasteners (rivets, eyelets, etc.), “nail” snaps, buckles, hooks, plastic items (aglets, injected closures, heat-sealed plastics) , zippers, ornaments, etc.
Age of wearer	Up to age 36 months
Standard(s)	16 CFR 1500
Test Methods	16 CFR 1500
Requirement	0.34 Nm

Attached components - non-grippable

Non-grippable components that would constitute a small part if detached (eg rhinestones, beads, glitter, etc.), are not permitted on footwear for children up to age 36 months.

Sharp Points

Scope	Footwear for children up to 14 years
Application	To any component, part or garment assembly. Examples include: labels, buttons, press fasteners (studs, snaps and rivets, among others), clasps with catches, Buckles, Hooks, Zipper parts, and other general adornments.
Age of wearer	Up to age 14 years
Standard(s)	UNE 59300, 16 CFR 1500
Test Method	UNE 59300 Sharp points test, 16 CFR 1500.48
Requirement	Maximum penetration, 0.5 mm under test.

USA: For children aged from 3 to 7 years old, pulling strength shall be performed with a minimum requirement of 66.8 N and torque test with a minimum requirement of 0.45 Nm. After this use and abuse test, component tested shall be evaluated according to sharp points and sharp edges requirements.

Sharp edges

Scope	Footwear for children up to 14 years
Application	To any accessible component, part or garment assembly. examples include: labels, buttons, press fasteners (studs, snaps and rivets, among others), Clasps with catches, Buckles, Hooks, Zipper parts, and other general adornments.
Age of wearer	Up to age 14 years
Standard(s)	UNE 59300, 16 CFR 1500
Test Method	UNE 59300 Sharp Edges Test / 16 CFR 1500.49
Requirement	Maximum length of cut, 50%.

USA: For children aged from 3 to 7 years old, pulling strength shall be performed with a minimum requirement of 66.8 N and torque test with a minimum requirement of 0.45 Nm. After this use and abuse test, component tested shall be evaluated according to sharp points and sharp edges requirements.

Nail points

Scope	Footwear for children up to 14 years
Application	To any footwear designed with nails as fixation point (if applicable)
Age of wearer	Up to age 14 years
Standard(s)	GB 30585
Test Method	Visual inspection
Requirement	No visible or protruding internal or external nail points.

Foreign objects

Scope	Footwear for children up to 14 years
Application	To foreign objects that should not be present such as needles, pins, loose components, etc.
Age of wearer	Up to age 14 years
Standard(s)	UNE 40902, CFR 1500, GB 30585
Test Method	Visual inspection
Requirement	None to be present.

Foreign objects (or any broken part of them) are defined as any item that should not be present or is not intended to be part of the product and that may be a hazard; examples include needles, pins or loose components.

6. How can it be avoided?

By producing footwear designs and controlling production variation, such that critical parameters are not exceeded.

For a more detailed information please see Annex I: Guide to Footwear Safety.

III. EU REGULATION OF MANDATORY COMPLIANCE

III. EU REGULATION OF MANDATORY COMPLIANCE

GENERAL PRODUCT SAFETY DIRECTIVE

1. 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.

2. Is it of mandatory compliance?

The GPSD is mandatory for all suppliers that manufacture, distribute and/or supply product imported into European Union member States, and requires all products to be safe or pose only the minimum of risk in normal use and foreseeable use for the lifetime 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 requirements for safety or “acceptable risk” are not defined; this is the responsibility of the manufacturer, retailer, importer etc. to decide, but 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 and where no specific European and national legislation or standards exist product safety should be assured by Risk Assessment.

The GPSD also places a requirement on Producers and Distributors, when they become aware 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.

Suppliers are required to inform the Sustainability Department of Inditex 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 have supplied.

IV. ANNEX

ANNEX I: GUIDE TO FOOTWEAR SAFETY

INTRODUCTION

Footwear safety for all ages of wearer is influenced by a wide number of factors:

- Cords, drawstrings, shoe laces, straps, loops and similar features on footwear present hazards of accidental entrapment, slips-trips and falls, and strangulation (through misuse). The level of risk is largely determined by the position on the footwear of these features and their length or size.
- Components and manufacturing processes present, or can introduce, hazards such as choking, aspiration or ingestion, cuts and piercing etc.
- Footwear is a functional product and where it's function is deficient or fails this presents hazards typically in the areas of slips-trips and falls.
- In addition, the fit and styling of footwear can have significant impact on the development of the foot, walking and gait and on long term foot health.

These requirements are designed to minimise these risks and are mandatory for all footwear.

The hazards presented by particular features or failures are also influenced by the behaviours 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 related to wearer's age and are applied to footwear according to the age of the wearer for which the garment is intended:

a) Babies and infants: footwear up to size 24, including those which usually fit for children up to 36 months.

b) Young Children: shoes from size 25 to size 34, both included, which are usually worn by children from 3 years to 7 years of age.

c) Older Children: shoes from size 35 or bigger, which are usually fit for 7 years up to 14 years.

The requirements of the GPSD imply that all hazards presented by a product are taken into consideration in determining if a product is safe. Should any aspect of a product appear not to be covered by the requirements then an assessment of its safety should be carried out by risk assessment. In the case of doubt Suppliers should refer to Inditex.

CORDS, DRAWSTRINGS, LACES, STRAPS AND LOOPS

Most of these requirements are derived from UNE 59300:2017 and apply to babies, infants and children's footwear. Many Standards and Regulations globally mirror these requirements.

Footwear features are described here using the definitions adopted in UNE 59300:2017. Any feature which is not defined but has similar characteristics to those defined should be treated as though they are the defined feature.

The limits on length are generally the maximum allowed. For functional elements, functionality can be achieved with these features substantially shorter than these maxima and the design aim, particularly in footwear for the most vulnerable, should be to minimise these lengths. Of particular concern for walking age infants and children is to avoid features being available for entrapment or hanging down to the ground and presenting a trip hazard.

Measurement of cord, strap and lace length

Measurements can vary significantly depending on how they are taken so various standards contain specific methods of measurement. Where a specific protocol is required for measurements it is described in the appropriate section.

Cords and laces: General guidance is to measure the relaxed but straightened length when the footwear is closed to its smallest fitting size.

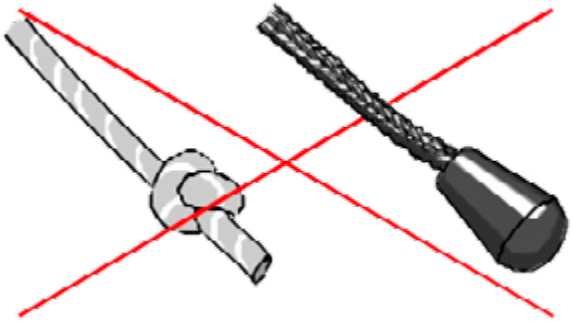
Loops: Generally, loops can be measured by taking the flat length and multiplying by two to give the circumference.

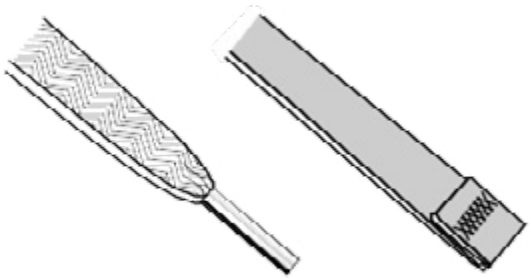
Straps: free ends of straps should be measured with the strap closed to is smallest size. For prong buckles this is usually the first hole; for touch and close straps this is the point at which the shoe is closed to its smallest.

Decorative cords: measure from the point at which the feature separates from the footwear.

Shoe laces

For guidance, it is recommended that laces for all children's footwear should have a free end length no longer than 20cm; which is considered sufficient to allow ease of tying. This length also ensures all laces remain well within the "maximum permitted length" (see below). Three dimensional embellishments or knots are not allowed anywhere on the free ends.



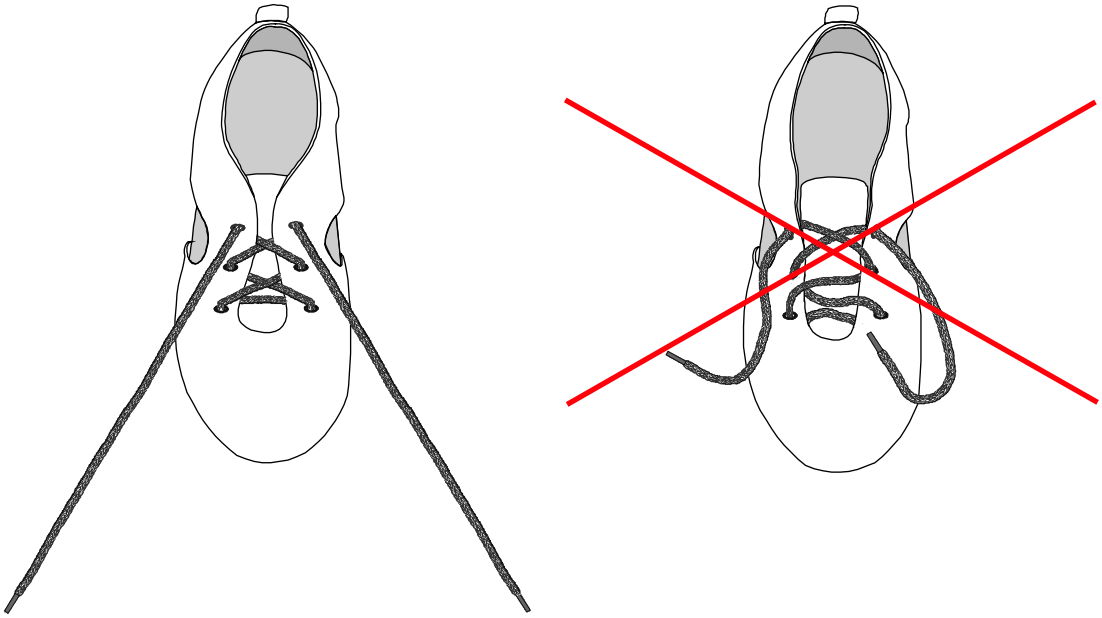


Ends must be treated to prevent fraying for example by heat sealing, stitching or a secure aglet (note aglets must pass the security of attachment test for small parts).

Determination of "maximum permitted length".

UNE 59300 specifies the maximum permitted length with reference to measurement taken following a specific protocol under a load of 100g.

The lacing must be tightened to close the shoe as far as it will go with the two free ends equal in length. Each end should be marked where it emerges (eg from the eyelet).



The lace is removed from the shoe and each end is measured from the mark to the end under a load of 100g; if there is any difference the greater of the two measurements is used.

Straps

Straps must not be able to touch the ground in wear and must not have a free end longer than 75mm.

Tied straps and tapes

Including wrap around and ankle straps special attention to straps to be tied at the back of the ankle to avoid free ends of excessive length or touching the ground.

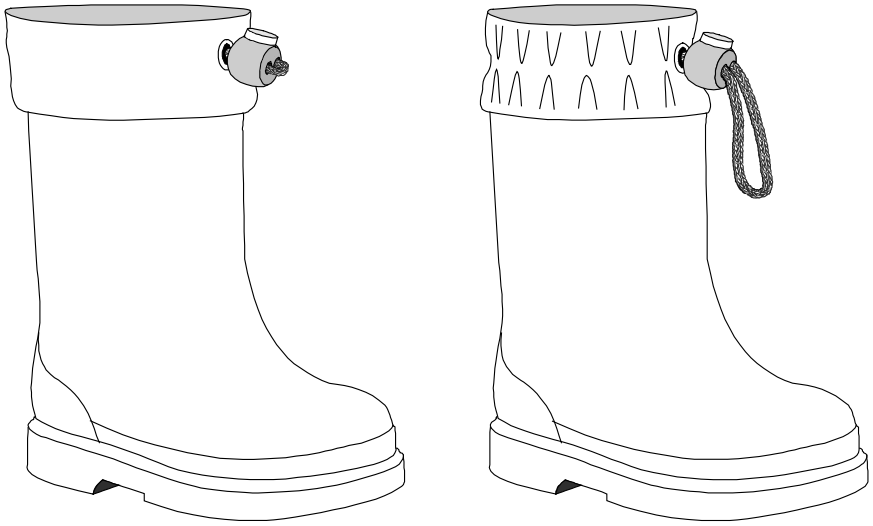
Drawstrings

With free ends:

The rules for laces also apply to drawstrings with free ends. Toggle clamps are not permitted on drawstrings with free ends.

With no free ends:

Toggle clamps shall not be separable from the footwear. When the closure is open to its maximum (see left) there must be no loop. When closed to its smallest (see right) the loop formed must not be more than 150mm in circumference.



Closure open to its maximum Closure open to its smallest

Zip pullers

The handles of the zippers. including any decorative motif, should not have a length greater than 75 mm from the zipper cursor. Also, with the zipper in the position of intended use (closed if it is functional), the zipper pull must not hang below the footwear.

Decorative cords and loops (including grip tabs)

At the back of footwear free ends and the circumference of loops (including grip tabs) must not be more than 50 mm.

Free ends and circumference of loops anywhere else on the footwear must not be more than 75 mm; and not reach the ground in wear.

COMPONENTS

Components are mainly described in these requirements in generic terms and where components are named it is generally for example only. The requirements must be applied to any item with the described characteristics.

Loose components and other foreign objects that could be present in the product or its packaging present additional hazards to those of components intentionally present so are also considered explicitly.

Requirements

A ***small part*** is defined in terms of the ISO 8124 small parts cylinder which simulates the fully expanded throat of a child under 3 years old. If any object can fit completely into the cylinder without compressing and in any orientation, it is defined as a "***Small Part***". 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 and infants (*i.e.* from birth to 36months). For this reason small parts are regulated in a wide range of products for this age group.

Small parts requirements generally apply to rigid items but soft plastics items may present substantially the same hazards. Similarly small textile items are also of concern if they are non-compressible, such as tightly packed stuffed items made of fabrics and/or yarns.

The tests to determine if a part constitutes a small part given in UNE 59300, EN71-1 and 16 CFR 1501 are equivalent. See Small Parts Test Method (reference).

Removable Parts

A removable part is any component or accessory which is intended to be capable of being separated from the footwear.

The inclusion of items such as brooches, badges and similar removable items which are “small parts” in babies’ and infants’ products is not permitted.

Larger removable parts in babies’ and infants’ products must be subjected to torque and tensile testing to establish their likely durability and as a result of these tests must produce no parts that are themselves small parts, have sharp edges or sharp points (see below) [UNE 59300].

Attached Components

Many of the components attached to footwear will of themselves be small parts if they were to be separated from the product. It is therefore essential that all such components on footwear for babies and infants are sufficiently secure and that they remain so throughout the reasonably foreseeable period of use of the product.

The approach to testing and the corresponding performance requirements differ between standards covering children’s products and according to whether the component can be gripped. In general, this is based on the ability of a child to grip the item and the likely forces they might be able to impart to pull it off (hence the different requirements according to item size). Some standards apply both torque and tensile testing to establish security. The reliability of a testing device to provide a secure grip and not cause greater damage to the item than might be expected through its foreseeable period of use however is critically important.

Where items are very small (≤3mm) they are unlikely to be gripped and pulled off by an infant but nonetheless can become detached in wear, cleaning, etc. and remain accessible as small parts. For this reason, Inditex do not permit non grippable parts that would constitute a small part if detached (diamante, heat fused component, glitter …) on footwear for babies and infants up to 36 months.

Mechanically attached components - rivets, snap fasteners, eyelets, studs.

These components typically are made up of two parts which are locked together from either side of a fabric / leather assembly; and usually by the application of pressure. The security of this attachment can be affected by the following factors:

- the process followed during attachment,
- the selection of appropriate parts to be applied,
- the fabric and assembly structure at the application site.

Component manufacturers application instructions and processes should be strictly followed and care taken to avoid damage to the parts prior to their attachment.

Generally these components need to pass the tension and torque tests.

Sharp Points and Sharp edges

No parts of, or components attached to footwear intended for children up to 14 years of age are permitted to have sharp points or sharp edges.

Tests for the penetration of a sharp point [UNE 59300 Sharp points test] and the sharpness of an edge [UNE 59300 Sharp Edges Test] are consistent across all standards which apply a test (and equivalent tests are defined in EN71-1 and CFR 1500.48 &.49).

However cutting and piercing hazards presented by sharp edges, points, burs, etc. and potential irritation and abrasion may not always be identified by these tests. These factors should be assessed by inspection. The sharpness and roughness of accessible edges, points, corners, seams or surfaces should be assessed, and are not acceptable if they have the potential to abrade or irritate the skin.

GB 30585 specifically considers points of nails which should not be visible either outside or on the interior of the footwear.

Foreign objects

Items that should not be present in the product or packaging, can also present hazards. Common problems usually involve needles, broken needle parts, pins, loose components, etc. For babies and infants up to 3 years of age, it is of paramount importance to avoid objects being introduced during production and packaging processes.

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