GFG GLOBAL FASHION GROUP

2024

PEOPLE & PLANET POSITIVE REPORT

CONTENTS

1. INTRODUCTION

1.1 ABOUT THIS REPORT

This report describes GFG's progress on our People & Planet Positive ("PPP") agenda over the financial year 1 January to 31 December 2024. 2024 marks our sixth year of non-financial performance reporting, third year under the 2030 PPP strategy and first year voluntary reporting under the Corporate Sustainability Reporting Directive ("CSRD"). This report summarises our approach, activities and progress across our six strategic pillars (see Figure 1) and establishes a framework for aligning with CSRD requirements. The report is split in two distinct sections starting with an update of our 2030 Sustainability Strategy and then leading into the Sustainability Statement required by our voluntary CSRD disclosure. Visit the Sustainability page on our website for more details on our strategy, key stakeholders and engagement methods.

Figure 1: GFG Strategic Priorities
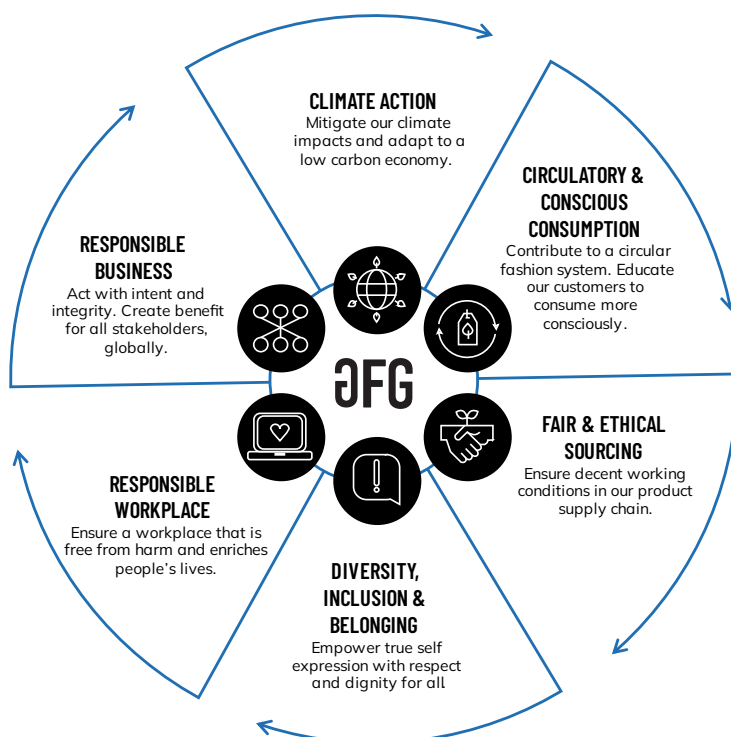
1.2 REPORTING STANDARDS & FRAMEWORKS

We continue to report in line with the national, European and international frameworks applicable to our business which includes:

- Luxembourg Law of 23 July 2016 on the Publication of Non-financial Information
- Information on Diversity A1561
- Article 8 of the EU Taxonomy Regulation
- Sustainability Accounting Standards Board ("SASB") standards
- United Nations Sustainable Development Goals ("SDGs")

Preparing for CSRD: The EU's CSRD on non-financial reporting is expected to come into effect in Luxembourg in the near future. GFG will implement CSRD through the European Sustainability Reporting Standards ("ESRS"). We have prepared through a Double Materiality Assessment ("DMA") to identify material reporting topics in our FY2024 non-financial declaration.

Textile Exchange: GFG remains aligned with the Textile Exchange since joining in December 2022. The Textile Exchange is a non-profit organisation that drives changes in materials across the industry by collaborating with companies on climate, biodiversity and raw material initiatives

UN Sustainable Development Goals ("SDGs"): This report highlights our alignment with the United Nations SDGs.[1]

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[1] Section 8.3 GFG Alignment to UN SDGs

1.3 GFG TARGETS

GFG sets annual milestones for its 22 targets for 2030 to guide our journey toward a more sustainable future. These targets overlap and supplement the new EU reporting requirements addressed in later sections of this report. For clarity and comparability, this section is included to highlight our progress made in 2024 and explain the achievements, challenges and outlook. In our 2023 report, we updated our targets therefore certain targets from prior reports are no longer included. We will continue to revise our strategic targets in line with evolving regulatory reporting requirements.

Below is an overview of our 2024 progress of our 2030 Strategic targets, categorised by target status:

- **Target met or exceeded**: delivered our ambitious goal
- **On track:** progressing as planned and on course for 2030
- **Target not met:** missed and identifying areas for improvement

Table 1: Overview of GFG's 2024 Progress on its 2030 Targets

Group Targets	2024 Progress	2030 Target
Climate Action		
By 2030, GFG will work with 3PL providers that provide more than 50% zero or low emission methods (EV, bicycles, walking) for last-mile delivery	On track - 9.0%	100%
By 2030, all GFG operating fulfilment centres and offices will be sourcing renewable energy	On track - 27%	100%
% of sold units that fulfil one or more Sustainable Product criteria	On track - 9.0%	25%
Circularity & Conscious Consumption		
% of waste of our operations diverted from disposal by reuse or recycling streams	On track - 74%	90%
By 2030, all our product & delivery packaging will be meeting one or more circular principles (Reduce, Reuse, Recycle or use materials circulating in the economy)	On track - 77%	100%
Establish at least one recovery programme collaboration in each operating country by 2030 to support a circular economy	On track - 46%	100%
Fair & Ethical Sourcing		
THIRD-PARTY BRANDS	% of brands meeting GFG's human rights standards for brands	On track - 20%	100%
OWN BRAND	% of Tier 1 factories assessed against living wages benchmarks where they exist	On track - 19%	100%
OWN BRAND	% of purchase orders placed in line with responsible purchasing practices	On track - 59%	100%
OWN BRAND	% of workers in Tier 1 factories can access an effective in-factory worker dialogue mechanism or an independent grievance mechanism	On track - 82%	90%
Responsible Workplace		
% of Senior Leaders complete quarterly safety walks & talks in all key operations	On track - 79%	100%[2]
% of our employees "agree that wellbeing is a priority at GFG"	On track - 75%	80%[2]
Number of permanent disability or fatality of our employees performing their duties in the workplace	Target met	Zero

Group Targets	2024 Progress	2030 Target
Diversity, Inclusion & Belonging		
% employees agree they "feel a sense of belonging"	On track - 73%	100%
% of employees agree 'they can be their true authentic selves at work' (true self-expression)	On track - 79%	100%
% of senior leaders will participate in diversity & inclusion awareness training	On track	100%
Responsible Business		
% of countries where we operate the GFG Conflicts of Interest Policy	Target met	100%[2]
% of professional skilled employees will have training & awareness on Business Ethics depending on their role and function	On track	100%[2]
% of countries where we operate the GFG Responsible Marketing Promises & Principles	On track	100%[2]
% of countries where we operate GFG's Fair Treatment of Suppliers Policy	On track	100%[2]
% of countries where we operate the GFG Political Involvement Policy	On track	100%[2]
% of countries where we operate the GFG Product Governance Policy	On track	100%

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[2] *2025 Target*

2. PEOPLE AND PLANET POSITIVE AGENDA

2.1 CLIMATE ACTION

Global Fashion Group recognises the critical role that responsible businesses in the ecommerce and fashion industry must play in implementing effective climate actions to combat climate change. Our climate change mitigation and adaptation strategy are guided by the People & Planet Positive Strategy framework, which was established and approved by the Group's Supervisory Board in 2021. The Group drives its climate action through several strategic objectives that reflect our updated targets starting from 2024.

Lower Emissions Logistics

In 2024, we focused on the strategic outlook of our third-party logistics last-mile partners to support our 2030 goal of working with providers that use more than 50% zero or low-emission methods. We see a positive trajectory in all our operating markets with 9.0% of our partners using 50% or more low emission delivery methods. We expect this share to steadily increase as low emission solutions become more commercially viable and available. Additionally, there are several trials underway in SEA that are testing new innovative last-mile delivery startups to complement our services.

Renewable Energy and Energy Efficiency in our Facilities

The Group is dedicated to reducing Scope 1 and Scope 2 emissions by minimising fossil fuel use and transitioning to renewable energy. Currently, 100% of electricity in ANZ and 69% in LATAM is sourced from renewables. We also prioritise energy efficiency through efficient lighting, machinery and climate controls in our fulfilment centres and offices and are exploring machinery electrification to further decrease fossil fuel dependence.

Sustainable Assortment Strategy

In 2024, our Sustainable Product Guide was launched following a 2023 revision driven by changing regulations and emerging 'Greenwashing' challenges across the industry. Our revised guide involved proactively removing certain materials due to a lack of clear standardisation and verification. With fewer recognised standards available, we reassessed our targets and milestones. In 2024, we set a global target of 7.0% and achieved a total of 9.0% of sold units meeting at least one sustainable product criteria. The Sustainable Product Guide primarily focuses on textiles, utilising a specific assessment tool to evaluate preferred materials in the industry. Recognising the need for long-term growth in our sustainable assortment, we plan to expand our focus to include the sustainability attributes of other impactful categories such as footwear. Moving toward 2030, our focus will broaden across the wider business to drive sustainability efforts in all our product categories.

As part of the Group's own-brand sourcing agenda, we are committed to increasing the use of preferred materials in our own-brand products. To further this commitment, the Group joined the Better Cotton Initiative ("BCI") in 2024 to support the transition away from conventional cotton.

Customer engagement is key for advancing our product sustainability agenda. Each region has a dedicated landing page highlighting products with a lower environmental impact, making it easier for sustainability-conscious consumers to make informed choices. In 2024, 1.52 million of our customers purchased products that met our sustainability criteria.

2.2 CIRCULARITY & CONSCIOUS CONSUMPTION

Focus and Priorities

In 2024, the Group reassessed its influence as a multi-brand online retailer to better focus on impactful targets and activities within its 2030 sustainability strategy. After exploring various circular business models and evaluating our operational setup, we concluded to prioritise direct operations, along with improvements of measures and internal data gathering.

We target product waste, packaging and waste management in our internal operations. This shift enables us to allocate resources effectively, establish internal measures and build a data history for product waste recovery. Understanding and evaluating our data will guide our strategy with precision.

More Sustainable Packaging

As we continue to refine our packaging strategy, we recognise the importance of considering more than just the raw material inputs. Our roadmap for the next few years will focus on the entire lifecycle of packaging, particularly the after-use stage.

In 2024, steady progress was made towards achieving our packaging sustainability targets. In ANZ, we trialled glassine protective bags as an alternative to plastic. However, glassine proved unsuitable for current operations due to functionality and practical concerns. Both ANZ and SEA implemented an automated warehouse packing machine to test custom packaging solutions and remove handles from delivery satchels of all sizes. In SEA, we transitioned our polybags to 100% recycled content and finalised the design for new luxury packaging using FSC-certified cardboard.

Given our reliance on local infrastructures, we will closely monitor initiatives such as the Australian Packaging Covenant Organisation ("APCO") and the National Packaging Targets in Australia. Starting in 2025, we will begin measuring both the inflows and outflows of our packaging materials. By taking these steps, we aim to align with global sustainability efforts and contribute to a more circular economy.

Responsible Waste Management

Responsible waste management is a key focus of the Group's circularity agenda which is focused on increasing recovery operations and minimising landfill use. In 2024, we took a pivotal shift by excluding incineration with energy recovery as a sustainable practice. The total amount of waste in our operations that has been diverted from disposal by reuse or recycling streams is 74%, slightly below target. The target was set without accounting for product waste and its recovery targets, as there was no baseline of product waste and understanding of its recovery. Our ambition is to gain a comprehensive understanding of in-house product waste and enhance internal operations to minimise waste. Our ANZ team has explored a partnership with a repair vendor to allow faulty or damaged items to be resold, with a trial set for 2025 and LATAM is exploring a partnership to buy and resell the internal product waste. In 2024, discussions with our waste management vendors in ANZ and SEA were held to improve the data quality of waste collected at our facilities and their recovery and disposal data.

Pre-loved, Upcycled and Repair

As we advance our circularity strategy, we recognise that circular business models require further development before they can be fully integrated into our operations. After careful evaluation of our business capacity and potential to drive this area, we have decided to discontinue the target for pre-loved items and shift our emphasis toward strengthening internal measures for the recovery and reuse of in-house product waste. This will allow us to build a robust data foundation and improve resource inflows and outflows in alignment with evolving regulatory frameworks, including the CSRD.

We remain committed to evaluating innovative circular business models and tracking relevant metrics, including the percentage of pre-loved assortment within our operations. However, at this stage, we are prioritising data-driven decision-making over setting fixed targets, ensuring a solid strategic foundation for future developments.

We are tracking the data for resources (e.g. products, packaging and waste) inflows and outflows from 1 January 2025, ensuring preparation, transparency and accountability in our approach as we prepare for future emerging EU regulations.

Take-Back

In 2024, the Group implemented six active take-back solutions in collaboration with third-party providers. A total of 122,052 units were recovered, exceeding our target mainly driven by SEA's outperformance. After collection, providers typically resell, donate or recycle the goods. Take-back initiatives remain essential to raise awareness and educate customers as we advance our circular strategies. In early 2024, SEA launched a Snap & Drop initiative with their app and cashback incentives. ANZ partnered with RCYCL, a clothing donation and recycling solution, offering customers convenient options to donate wearable clothes or recycle unwearable clothes, with a focus on long-term education and mindset shifts towards responsible end-of-life clothing management. Infrastructure limitations in LATAM led to the withdrawal of our only take-back initiative there.

2.3 FAIR & ETHICAL SOURCING

Human Rights in Our Value Chain

Fair and ethical sourcing within the value chain is essential for maintaining ethical and sustainable business practices. As a multi-brand retailer, we acknowledge our responsibility across the entire supply chain, encompassing both our own-brand value chain and that of third-party brands products, delivering more sustainable and socially conscious products to our customers. Respecting fundamental human rights, ensuring decent working conditions, and promoting environmental well-being are essential to our values.

In a landscape of heightened consumer awareness and evolving regulations, we have solidified ethical practices as a cornerstone of our PPP agenda. Central to this commitment is our Supplier Code of Conduct ("Supplier Code"), which aligns with the United Nations Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and internationally recognised labour standards, such as those outlined by the International Labour Organization ("ILO"). Through this approach, we aim to mitigate risks of common abuses in the fashion industry, such as unfair wages, excessive working hours and unsafe work environments, as highlighted in the Risks and Opportunities section of the GFG 2024 Annual Report.

Our efforts aim to go beyond compliance by fostering a supply chain built on trust, respect and collaboration. To ensure progress, we focus on the following strategic priorities:

- Fundamental Human Rights and Decent Work
- Living Wages
- Worker Dialogue and Collective Bargaining

- Transparency
- Responsible Purchasing Practices

Due Diligence in Our Value Chain

Due diligence is central to the Group's commitment to responsible purchasing and ethical supply chain management. In 2024, we introduced the Responsible Purchase Practices Framework. This framework sets clear requirements for human rights assessments, decent work standards, financial diligence and sourcing strategies. By 2030, we aim for 100% of our own brand purchase orders to comply with this framework.

We monitor our own brand suppliers to ensure adherence to key standards, including (1) living wages and reasonable working hours, (2) grievance mechanisms and collective bargaining rights and (3) community engagement to promote inclusive development.

For third-party brands, we conduct regular reviews against the Group's Human Rights Standards for Brands. In 2024, 20% of these brands met our standards, and we are committed to achieving 100% alignment by 2030.

To achieve fair and ethical sourcing across the whole business, it is necessary to evaluate all brand partners and work towards establishing common ground for aligning on human right standards. As part of this effort, a remediation process will have to be developed for non-compliant brands which we aim to implement towards our 2030 milestone. These measures ensure accountability and foster ethical practices, helping GFG create a more sustainable and socially responsible fashion industry.

Collaboration with Brands and Suppliers

Ethical sourcing is a collective responsibility, and we are committed to fostering throughout our supply chain. Through the Groups fair and ethical sourcing programmes, we work closely with own brand suppliers to ensure that workers are afforded their fundamental labour rights.

Ethical sourcing standards are upheld through mandatory audits. All Tier 1 and Tier 2 factories undergo Association for Professional Social Compliance Auditors ("APSCA")-certified third-party audits within 12 months to ensure compliance with our Supplier Code and local laws. Factories are rated A to D based on these audits, with only A or B-rated factories approved for production. Starting in 2024 enhanced measures were implemented to ensure collaborations only with suppliers demonstrating lower risk and no Critical or Highly Critical issues within their operations. Before formally onboarding into the Group's supply chain, particularly in China and Southeast Asia, all new factories must undergo a site visit conducted by the Group's Fair and Ethical sourcing team. This process involves a thorough review of outstanding issues to verify the absence of critical concerns, such as forced labour or excessive working hours, thereby reinforcing our commitment to ethical sourcing practices.

Engagement with third-party brands focuses on aligning human right standards across their operations. For brands not yet fully aligned with the Group's Brand Human Rights Framework, we provide targeted support through capacity-building sessions and a complimentary eLearning programme developed in collaboration with an external service provider. To supplement this initiative, we use an action plan survey to gather insights into brands' current practices and their commitment to developing robust human rights programmes. Our programme has six essential focus areas:

- Introduction to Human Rights
- Developing a Code of Conduct
- Supply Chain Transparency and Traceability
- Supply Chain Monitoring
- Ethical Sourcing
- Corrective Action Plans

Continuous Improvement

We continuously reflect on our activities and progress we have made with our fair and ethical sourcing programme. This ongoing process aims to mitigate risk and foster trust not only with our consumers but also with our suppliers. To support suppliers better in implementing improvements, we are reassessing our Fair & Ethical Trade manual including our remediation process and eLearning programmes to guide them through key risk areas while still supporting their business and ensuring alignment with our values of ethical business conduct reinforcing our commitment to ongoing improvement.

Table 2: Fair & Ethical Sourcing Initiatives and 2024 Progress

Fair & Ethical Sourcing Initiatives	2024 Progress
Fundamental Human Rights and Decent Work	

• Elevate own-brand suppliers beyond mere compliance with enhanced measures
• Provide consolidated support and resources to improve third-party brands' human rights operations
	• Verified compliance with GFG's *Supplier Code of Conduct* on 82 own brand Tier 1 and Tier 2 factories through third-party audits and internal staff visits resulting in:
	  – 11% of factories were graded A
	  – 89% of factories graded B
	  – None were graded C or D
	• 100% of these own brand suppliers met GFG standards with our review and support

Living Wages	
• Conduct living wage assessment using the threshold established by the Wage Indicator Foundation	• 19% of our own brand Tier 1 factories across all regions have been subjected to assessment
Worker Dialogue & Collective Bargaining	
• Ensure GFG's own brand Tier 1 factories allocates its workers with access to an effective in-factory worker dialogue mechanism, or an independent grievance mechanism provisioned by GFG	• 82% of workers in Tier 1 factories can access an effective in-factory worker dialogue mechanism or an independent grievance mechanism • Directly engaged with workers through the adoption of SpeakUp!, an independent grievance mechanism, at our Tier 1 factory suppliers.
Transparency	
• Provide transparency on our Tier 1 factories	• Updated and maintained the suppliers list on the corporate websites of all GFG regions quarterly • Updated our Tier 1 factory list quarterly on the *Open Supply Hub*
Responsible Purchasing Practices	
• Promote and strengthen responsible purchasing practices in GFG	• Deliver capacity building to all responsible purchasing departments • Monitored responsible purchasing KPIs to verify responsible purchasing practices

2.4 DIVERSITY, INCLUSION & BELONGING

At GFG, we remain committed and focused on creating an environment where our people feel they are treated with dignity and respect, can be their authentic self at work and feel like they belong. All three of those elements drive a culture of psychological safety and in 2024, we prioritised integrating our diversity, inclusion and belonging survey results into the broader employee engagement action plans to ensure our people recommend GFG as a great place to work.

Our Group Shared Functions DIB Learning Plan (supported by our local policies) reflects this intent where all employees irrespective of level participated in diversity, equity and inclusion sessions to build awareness, understanding, knowledge and to further embed and highlight behaviours we expect and stand by.

Additionally, we maintained our commitment to diversity in our leadership roles with the Management Board remaining 50/50 Male / Female and our Senior Management team 62/38 Male / Female representation. We remain committed to fostering a diverse and inclusive workforce beyond gender to embrace the many local communities.

As we look towards 2030, our priority is to further expand on our DIB Learning Plan across all regions to support our target of all senior leaders to participate in diversity and inclusion awareness training.

2024 Employee Survey Results

Overall employee survey results for 2024 remained consistent with 2023, with a slight increase in our people saying, "they are treated with dignity and respect and being free to be their authentic self at work".

I am treated with dignity and respect at GFG	82%
I can be my authentic self at work (true self-expression)	79%
I feel like I belong at GFG	73%
Overall DIB Progress Score	**78%**

Employee Engagement	ANZ	LATAM	SEA	SHARED FUNCTIONS	GROUP
"I would recommend GFG as a great place to work"	75%	84%	63%	83%	**76%**

2.5 RESPONSIBLE WORKPLACE

Our Commitment

At GFG, we are committed to creating a workplace where everyone is safe, empowered and supported to perform at their best. This vision underpins our dedication to upholding decent working conditions, maintaining robust health and safety systems, and ensuring fair governance and reporting.

In 2024, we made significant progress toward this commitment:

- **Zero work-related fatalities:** We maintained a spotless safety record, ensuring the highest standards of safe work practices across all operations.
- **Enhanced HS&W systems:** Our Health, Safety, and Wellbeing ("HS&W") systems were further strengthened by embedding a culture where "safety is everyone's responsibility".
- **Regional certifications:** We upheld voluntary ISO 45001 certifications in Malaysia, Indonesia and the Philippines.
- **Leadership-driven focus:** Senior H&S leaders appointed in every region to advance our health and safety agenda locally.

These efforts reflect our unwavering commitment to safeguarding our workforce and fostering a culture of health, safety and wellbeing across the organisation.

Update on Our Responsible Workplace Framework

GFG's commitment to responsible workplaces starts with empowering local action. Our Group Responsible Workplace Framework provides a guiding structure for each local operation to tailor its roadmap based on their specific priorities and risks.

In 2024, we saw progress across all areas of the framework:

- **Leadership & Accountability:** To boost awareness, transparency and accountability in Health and Safety, all regions and key operations participated in 52 senior leadership walks across nine operational sites.
- **Engagement & Education:** Conducted targeted training initiatives including:
  - Frontline employees (particularly delivery staff) received direct training with regular refreshers. Senior leaders attended continuous awareness sessions on health and safety topics such as psychosocial risk and hazards.
  - LATAM and SEA's own fleets completed regular road safety training. In Indonesia, a *Rider Safety Programme* was created in collaboration with local authorities to address heavy congestion and complex traffic patterns, particularly in Jakarta.
- **Measure & Report:** In 2024, GFG recorded 151 workplace incidents (78% first aid with less than 2% major) and 85 near misses, which were proactively resolved. This is a 41% reduction compared to 2023.

- **Good Governance:** GFG uses ISO45001 standards to guide our strategy and planning. Whilst pursuit of the certificate is optional, Malaysia, Indonesia and the Philippines proactively achieved and maintained their certifications. Across all regions, timely investigations and remediations of all reported incidents in 2024 showcased the effectiveness of our local H&S committees.

In 2024, we enhanced safety communication and advanced our reporting systems. Employees, particularly in fulfilment centres, actively contributed HS&W insights through structured channels ranging from daily stand-ups to regular leadership reviews. Progress was also reviewed bi-annually by the Sustainability Committee of the Supervisory Board. This structured approach fosters transparency and informs critical decisions. We updated our Safety Maturity Capability Assessment with regional H&S leaders. Compared to 2021, we improved in 11 of 15 maturity model dimensions and will use these insights to drive further enhancements. Additionally, we are exploring automation to strengthen local and global reporting systems.

Labour Service Providers

GFG is committed to promoting decent working conditions across our supply chain, including for individuals employed through workforce labour service providers. To uphold this commitment, we have implemented the GFG Framework for the Management of Labour Service Providers, which mandates comprehensive due diligence, including annual risk assessments for both existing and new providers in all our markets. This applies to key service areas such as last-mile delivery, security, maintenance, cleaning, contact centres, marketing distribution and warehouse labour.

Our risk assessments evaluate factors like national employment laws and corporate labour practices, enabling us to identify and manage potential risks related to indirect employment.

In 2024, we assessed 108 providers globally under this framework. Of these, four providers, primarily in last-mile delivery, exhibited high-risk indicators, including reliance on migrant workers requiring visas and accommodation. All high-risk providers underwent additional on-site audits and corrective action plans were implemented to address identified issues.

This rigorous approach reinforces our commitment to responsible labour practices to safeguard the rights of workers and ensure ethical operations throughout our supply chain.

2.6   RESPONSIBLE BUSINESS

GFG remains committed to upholding the highest standards of corporate governance and responsible business practices. In 2024, we reviewed the structure of our Responsible Business pillar and identified the need for additional time to assess current internal and external requirements and ensure consistent implementation of policies under the 2030 People & Planet Positive Strategy across the Group. While some aspects are already addressed regionally or through our Code of Business Conduct and Ethics, further alignment is required for the following policies:

- GFG Responsible Marketing Promises & Principles
- GFG Fair Treatment of Suppliers Policy
- GFG Political Involvement Policy
- GFG Product Governance Policy

We will complete this assessment in 2025 and provide an update in the 2025 People & Planet Positive Report. Further details on our governance processes and procedures can be found in the ESRS - G1 section of this report.

2.7   2025 OUTLOOK

In 2025, we will focus on continuous improvement and adaptation to the evolving regulatory landscape. GFG will monitor upcoming changes and regulations whilst focusing on internal improvements, such as reducing carbon emissions through sustainable products and packaging, waste management reporting and ethical trade practices. The Group will also continue to assess and adapt its Key Performance Indicators ("KPIs") as needed to remain aligned with industry best practices and regulatory requirements.

3. SUSTAINABILITY STATEMENT

3.1 BASIS FOR PREPARATION

ESRS 2 General Disclosures

BP-1 General Basis for Preparation of the Sustainability Statement

- GFG's sustainability statement is prepared following the CSRD and ESRS guidelines on a best effort basis. The statement includes data from GFG's operations and its upstream and downstream value chain, ensuring comprehensive coverage of material impacts, risks, and opportunities.

BP-2 Disclosures in Relation to Specific Circumstances

- For the 2024 reporting period, GFG has structured its voluntary sustainability disclosure to prepare on a best effort basis for future compliance with the CSRD, implemented by the ESRS. This includes a double materiality assessment to identify material impacts, risks, and opportunities across GFG's operations and value chain.

IRO-1 Description of the Processes to Identify and Assess Material Impacts, Risks, and Opportunities

- GFG's process for identifying and assessing material impacts, risks, and opportunities includes a review of relevant standards, stakeholder engagement, and a detailed materiality assessment. This process ensures that GFG addresses the most significant sustainability issues affecting its business and stakeholders.

IRO-2 Disclosure Requirements in ESRS Covered by the Undertaking's Sustainability Statement

- GFG's sustainability statement includes disclosures required by the ESRS, covering material impacts, risks, and opportunities identified during the double materiality assessment. This ensures compliance with regulatory requirements and alignment with stakeholder expectations.

GFG Operations Overview

SBM-1 Strategy, Business Model, and Value Chain

- GFG's business model focuses on global fashion and lifestyle ecommerce, with operations in LATAM, SEA, and ANZ. The company's strategy includes providing a broad assortment of products, enhancing customer experience, and fostering innovation for sustainable growth.

SBM-2 Interests and Views of Stakeholders

- GFG engages with stakeholders, including customers, employees, investors, suppliers, and regulators, to understand their views and interests. This engagement informs GFG's strategy and business model, ensuring alignment with stakeholder expectations.

SBM-3 Material Impacts, Risks, and Opportunities and Their Interaction with Strategy and Business Model

- The material impacts, risks, and opportunities identified during the materiality assessment are described and presented alongside the topical standards in GFG's sustainability statement. This includes climate change, social sustainability, ethical business conduct, health and safety, energy and resource consumption, circularity, and information-related impacts for consumers.

Sustainability Governance

GOV-1 The Role of the Administrative, Management, and Supervisory Bodies

- Global Fashion Group operates a two-tier governance structure consisting of a Management Board and Supervisory Board. The Management Board is responsible for managing the Company, and the Supervisory Board is responsible for carrying out the permanent supervision and control of the Management Board without being authorised to interfere with such management. The Management Board and Supervisory Board cooperate closely for the benefit of the Company. Oversight of the Company by the Supervisory Board takes place in meetings of the Supervisory Board and the various committees of the Board, including the Sustainability Committee. It is the responsibility of the Sustainability Committee to assist the Supervisory Board with oversight of the Company's sustainability policies and practices. It makes recommendations to the Supervisory Board regarding the Company's policy and performance in relation to health and safety, diversity and inclusion, and compliance with laws concerning environmental and social matters, and their implementation. In addition, the Sustainability Committee reviews and approves the Company's sustainability strategy, objectives, key results and policies and approves for submission to the Supervisory Board the Company's annual sustainability report submitted to it by the Management Board. All the members of the Sustainability Committee are independent.

GOV-2 Information Provided to and Sustainability Matters Addressed by the Undertaking's Administrative, Management, and Supervisory Bodies

- The Management Board holds ultimate responsibility for setting GFG's sustainability strategy, monitoring progress, and overseeing policies designed to address material impacts, risks, and opportunities. The Management Board and the Global and Regional Sustainability Leaders steer the sustainability agenda and provide monthly updates to the Group COO as responsible Management Board Member and biannual updates to the Sustainability Committee.

GOV-3 Integration of Sustainability-Related Performance in Incentive Schemes

- GFG includes sustainability-related performance in the incentive schemes for the Management Board and the Global Leadership Team. This includes short-term incentive payments for achieving progress towards GFG's science-based emissions reduction and Human Rights targets through specific measures.
- GFG links Management Board and Leadership remuneration to sustainability through structured incentive schemes. These align leadership interests with long-term strategic goals, incorporating both fixed and variable elements, with sustainability integrated into short-term incentives ("STI"). Sustainability-related targets within STI include:
- Climate Action: Percentage of sold units meeting sustainable product criteria.
- Fair and Ethical Sourcing: Percentage of third-party brands meeting GFG's human rights standards.
- Sustainability metrics account for 20% of total financial incentive, ensuring a direct link between variable pay and sustainability performance. The Remuneration Committee approves and updates STI terms, while the Supervisory Board sets and reviews targets to maintain alignment with strategic and regulatory requirements.
- This framework embeds climate-related considerations into GFG's remuneration policies, reinforcing accountability at all levels.

GOV-4 Statement on Due Diligence

- GFG's due diligence process includes embedding due diligence in governance, strategy, and business model, engaging with affected stakeholders, identifying and assessing adverse impacts, taking actions to address those impacts, and tracking the effectiveness of these efforts.

Core Elements of Due Diligence	Reference in People & Planet Positive Report or Annual Report
Embedding due diligence in governance, strategy and business model	ESRS 2 GOV-2, page 16
	ESRS 2 GOV-3, page 16
	ESRS 2 SBM-3-E1, page 32
	ESRS 2 SBM-3-E5, page 45
	ESRS 2 SBM-3-S1, page 48
	ESRS 2 SBM-3-G1, page 55
Engaging with affected stakeholders	ESRS 2 GOV-2, page 16
	ESRS 2 SBM 2, page 18
	ESRS 2 G1, page 56
	Annual Report, section 3.2 and 3.3
Identifying and assessing adverse impacts	ESRS 2 IRO1, page 19
	Annual Report, section 2.4
Taking action to address those adverse impacts	ESRS E1, page 33
	ESRS E5, page 44
	ESRS S1, page 49
	ESRS G1, page 56
	Annual report, section 2.4
Tracking effectiveness of these efforts and communication	ESRS E1, page 33
	ESRS E5, page 44
	ESRS S1, page 49
	ESRS G1, page 56

GOV-5 Risk Management and Internal Controls Over Sustainability Reporting

- GFG's sustainability reporting is exposed to risks of material misstatement due to human error or incomplete data. To manage this risk, GFG has implemented processes to ensure accurate data collection and reporting, including the use of a dedicated semi-automated sustainability reporting dashboard and third-party carbon accounting tool - Unravel Carbon.

3.2 GFG STRATEGY & BUSINESS MODEL

SBM-1 - Strategy, Business Model and Value Chain

Business Model

Global Fashion Group ("GFG" or "the Group") is the leading fashion and lifestyle destination in 11 countries of operation across three main geographic regions: Latin America ("LATAM"), South East Asia ("SEA") and Australia and New Zealand ("ANZ"). Our three ecommerce platforms operate under three individual brand names: Dafiti in LATAM, ZALORA in SEA and THE ICONIC in ANZ. For more information on the Group and access to all publications, please visit our corporate website.

GFG connects 800 million consumers with thousands of brands through its online pure-play platforms and offers a broad assortment of products across fashion and lifestyle categories.

GFG's products are sourced under two business models: Retail, where GFG owns the inventory, and Marketplace, where brand partners retain inventory ownership. GFG also assists brand partners in developing their ecommerce capabilities with its Platform Services offering, including fulfilment, marketing, and data analytics services.

The Company's infrastructure includes seven regional fulfilment centres, tailored payment options and reliable delivery services. GFG's technology platform is a key differentiator with a global team of 500+ developing scalable and custom-built solutions for each market.

GFG is structured as a stock corporation in Luxembourg. For further details on the business model, please refer to GFG's Annual Report Section 2.1.1.

Corporate Strategy

GFG's vision is to be the #1 fashion and lifestyle destination in our markets. GFG's corporate strategy is built on three strategic priorities: (1) best-in-class customer experience, (2) partner of choice for brands and (3) people & planet positive.

For further details on our strategy, please refer to GFG's 2024 Annual Report Section 2.1.2.

Sustainability Strategy

GFG's 2030 sustainability strategy focuses on six priorities: Climate Action, Circularity, Fair Sourcing, Diversity, Responsible Workplace, and Responsible Business. In 2024, GFG updated its sustainability targets, emphasising areas with the highest impact and control. Key initiatives include strengthening GHG reporting, advancing sustainability reporting readiness, and integrating sustainability into core business strategies. The company aims to align with industry trends in traceability, circular models, and decarbonisation, driving robust sustainability integration toward its 2030 goals.

Stakeholders

GFG engages with its stakeholders comprehensively to address sustainability and business goals and understand their view and input. This includes and is implemented through:

- Conducting a detailed materiality assessment through industry research, customer surveys, and stakeholder interviews. These efforts help identify material issues impacting both the business and primary stakeholders
- Stakeholder Identification and Engagement
- Governance Structure that includes a Sustainability Committee of the Supervisory Board and Group and Regional Sustainability Committees. These bodies oversee the implementation of sustainability policies and practices and ensure alignment across regions
- Sustainability Reporting which summarises the results of the above points and ensures continuous improvement

Through these structured and proactive approaches, GFG ensures that it effectively engages with stakeholders and addresses their concerns while advancing its sustainability and business objectives. Table 3 discloses how we engage with our key stakeholders and our key expectations

Interest and Views of Stakeholders

SBM-2 - Interest and Views of Stakeholders

Table 3: SBM-2 Interest and Views of Stakeholders

Stakeholder	How We Engage	Key Expectations
Top Management & Board Members	• Annual General Meeting • Board and Committees meetings • Annual report • Financial audit process • Press releases and external publications • Ad hoc announcements • GFG website and regional websites (ZALORA, The ICONIC and Dafiti)	• Compliance with relevant laws and regulations • Business strategic direction and purpose alignment • Corporate governance • Transparency • Financial and sustainability performance
Investors	• Annual General Meeting • Annual and Interim reports • Press releases and external publications • Ad hoc announcements • GFG website and regional websites (ZALORA, The ICONIC and Dafiti) • Capital markets days • Investor briefings and ad hoc meetings • Sell-side meetings • ESG ratings	• Long-term value creation • Sustainable business model and supply chain • Workforce diversity • Business succession planning • Commitment to climate action • Risk management • Corporate governance and board effectiveness
Auditors	• Board and Committees meetings • Annual & Sustainability Report • Financial & Non-Financial audit process	• Certified annual reporting • Regulatory updates and insights
Brands	• Quarterly Business Reviews • Ad hoc meetings • Engagement surveys and questionnaires • Brand summit • Contract negotiations • Press releases • Website	• Long term relationships • Compliance with GFG requirements • Brand promotion • Commercial terms and planning
Government / Regulatory Bodies	• Initiatives that support small & medium enterprise in ecommerce • Multi-stakeholder working group participation • Reporting • Direct dialogue and meeting	• Compliance with relevant laws and regulations • Transparency • Worker's rights protection – Customer rights protection
Competitors	• Industry events and topical knowledge sharing • Ad hoc meetings	• Industry insights and collaboration
Employees	• Town halls / All Hands / Live Streams / Employee pulse surveys (including sustainability questions) • Internal communications / newsletters • Social media (Employee Portals, Google Spaces & Teams) • Learning and development opportunities and engagement workshops • Performance evaluations and feedback loops • Social activities • Employment-related policies	• Career and growth, learning development • Involvement in GFG sustainability initiatives • Ability to align personal values with organisational purpose • GFG as an employer committed to ethics and sustainable values • Occupational health and safety, wellbeing

Stakeholder	How We Engage	Key Expectations
Customers	• GFG website and regional websites (ZALORA, The ICONIC, and Dafiti) • Customer service (Email, chat, phone) • Social media (Facebook, Instagram, LinkedIn) • Brand survey • Sustainability behaviour survey • Press releases • Marketing campaigns • Pop up shops	• Product quality • Product end of life • Products align with environmental and social expectations • Environmental impacts of packaging • Transparency of product information (e.g. factory origin, materials)
Local Communities	• Charity partnerships and joint initiatives • Donations of money or goods • E-donation via GFG platforms • Employee volunteering • Public support of critical issues in GFG social media and marketing campaigns • Access to expertise, skills and knowledge to support community programmes	• Align business with community issues • Expand reach and education on community issues • Provide access to resources for communities represented • Social protection
NGOs, Civil Organisations and Campaigners	• Multi-stakeholder groups • Ad hoc meetings • Questionnaire completion e.g. CDP, Fashion Revolution Brazil • Memberships e.g. Seamless, Textile Exchange	• Long term relationships • Social impacts including supply chain working conditions • Traceability • Transparency • Purchasing practices • Environmental impacts including climate change

3.3 DOUBLE MATERIALITY ASSESSMENT

IRO-1 Description of the Process to Identify and Assess Material Impacts, Risks and Opportunities

The double materiality assessment ("DMA") framework was developed in accordance with the requirements of the ESRS on a best effort basis. This included identifying and objectively scoring impacts, risks, and opportunities ("IROs") over an established time horizon, as a basis for the materiality decision of the sustainability matters, resulting in the DMA. The assessment covers GFG's operations and its upstream and downstream value chain, ensuring a holistic view of material impacts, risks, and opportunities as outlined in the ESRS 1, paragraph AR16.

Governance and Process

The DMA process involved the following key steps and was conducted by a designated Sustainability Team who has deep knowledge of affected stakeholders and to provide insights on the sustainability matters and identify and score the IROs:

1. **Context:** Understanding the definition of GFG's stakeholder engagement strategy.

2. **Identification:** Listing potential material sustainability matters and impacts, risks, and opportunities based on the ESRS, SASB, MSCI and S&P. Sustainability Topics were clustered into categories where applicable.

3. **Assessment:** Evaluating the materiality of these impacts, risks, and opportunities based on nature of impact, positive / negative impact, scale, scope, irremediability and if it is a current or potential impact.

Stakeholder Engagement

Key stakeholders, including GFG's senior business representatives, shareholders, employees, brand suppliers, advisors, and customers, were engaged to validate the identified sustainability topics and provide feedback on GFG's impacts on people and the environment.

Value Chain

In line with ESRS requirements for value chain considerations under CSRD, GFG has identified five key areas in its value chain: External Brand Partners, Marketplace Partners, 3PLs, Own Brand Factories, General Suppliers and Platform Services have been excluded at this stage but will be included once they progress to a more substantial part of the business.

1. **External Brand Partners:** The top 30 brands account for approximately a third of our global NMV, representing less than 0.5% of brand partners, with 80% subject to CSRD or similar regulations. However, GFG's influence is limited as sustainability impacts primarily occur in Tier 4 or beyond, managed by the brands themselves. This area is therefore not considered material for GFG.

2. **Marketplace Partners:** Marketplace contributes more than a third of GFG's NMV. While GFG facilitates product listing and sales through its systems and platforms, it has limited control over suppliers' stock, product range, or delivery methods. This area is not deemed material.

3. **3PLs:** GFG's logistics providers, including freight forwarders and last-mile transport, operate in Tier 1 relationships. This area has a more direct impact and is deemed material for emissions and supply chain efficiency.

4. **Own Brand Suppliers:** Representing a low percentage of our global NMV, with approximately 60 factories globally, While GFG has influence through its supplier code of conduct and other initiatives we have deemed this area as not material.

5. **General Suppliers:** These suppliers, primarily in IT and infrastructure, are deemed immaterial due to limited energy impact and minimal sustainability risks.

This evaluation ensures compliance by prioritising material impacts and direct influence in reporting.

Materiality Assessment

The materiality assessment's scoring methodology and criteria were undertaken in accordance with the requirements in ESRS 1, focusing on:

- **Impact materiality:** scale, scope, irremediability, nature of impact, likelihood of impacts (based on whether an impact is positive / negative and current / potential). Direct human rights-related impacts were also considered.
- **Financial materiality:** financial magnitude of risk / opportunity, likelihood, and the nature of the financial effect following the annual Enterprise Risk Management ("ERM") process.

GFG integrates climate risk into its ERM system, aligning it with financial risk over three defined time horizons:

- **Short-term:** 1–5 years
- **Medium-term:** 5–10 years (2030)
- **Long-term:** Over 10 years (2050)

For the DMA, the short-term horizon is the primary focus. Potential material topics are assessed based on their likelihood, with only those rated "Possible" or higher being considered under the medium- or long-term horizon. This also ensured that the sustainability-related risks and opportunities were aligned with other enterprise risks and opportunities that have been identified.

In assessing Human Rights impacts, each topic is evaluated as either "Yes" or "No" for potential human rights violations across direct and indirect business operations. If a violation is identified, severity takes precedence over likelihood. Otherwise, the topic's materiality is determined based on its significance within GFG's business context and value chain.

The scoring of the identified IROs was performed by the dedicated Sustainability Team to the best of their ability aligning the results of the Impact and Financial impact assessment. All IROs were scored objectively.

The process was informed by GFG's due diligence processes through a review of internal policies and procedures, TCFD assessment conducted in 2021 and the ERM system's inventory of risks. A sustainability topic was deemed material if it was above the threshold individually or on cluster level, indicating either impact materiality, financial materiality, or both. Non-material sustainability matters were those which were below these thresholds.

To validate and finalise decisions on material sustainability matters a questionnaire and interview approach with key identified stakeholders was conducted, followed by a validation session with the Management Board and subsequent approval.

Material Topics

In total, 187 IROs were identified and evaluated during the DMA. Of those, 47 were deemed material. 14 risks and opportunities were identified, of which all were deemed material.

The IROs were clustered and mapped to thirteen material sustainability matters. The IRO-2 disclosures that include the index of ESRS disclosure requirements and the list of data points that derive from other EU legislation can be found in the Appendix.

The following topics were identified as material from both an impact and financial perspectives:

1. **Climate Risk (E1)**
   – Transition Risk Consumer Products: Emissions from the value chain, requiring investment in manufacturing technologies, logistics, and supply chains.

-   Transport and Delivery: Costs associated with clean energy mobility technologies and process improvements.
    -   GHG Emissions: Managing risks associated with increased emissions from GFG's operations and supply chain.

2. **Social Sustainability & Compliance (S1/2)**

    -   Worker Rights / Forced Labour: High stakeholder materiality due to labour-intensive production in the fashion industry.
    -   Collective Bargaining: Supporting workers in developing markets through supplier codes of conduct.

3. **Ethical Business and Business Conduct (G1)**

    -   Corporate Culture: Promoting ethical principles, corporate social responsibility, and providing grievance mechanisms.

4. **Health, Safety and Wellbeing (S1)**

    -   Own Workforce Health & Safety: Ensuring a positive workplace environment, leading to higher productivity and employee retention.

5. **Energy & Resource Consumption (E1)**

    -   Energy Management: Efficient use of energy and sustainable energy sources to mitigate climate change.

6. **Circularity (E1/5)**

    -   Product & Packaging Waste: Addressing waste and recycling to comply with regulations and respond to consumer preferences.

7. **Information-related Impacts for Consumers and / or End-users (S4)**

    -   Privacy: Protecting customer data to prevent negative impacts on brand and financials.

Figure 2: GFG Impact Materiality Risk Assessment
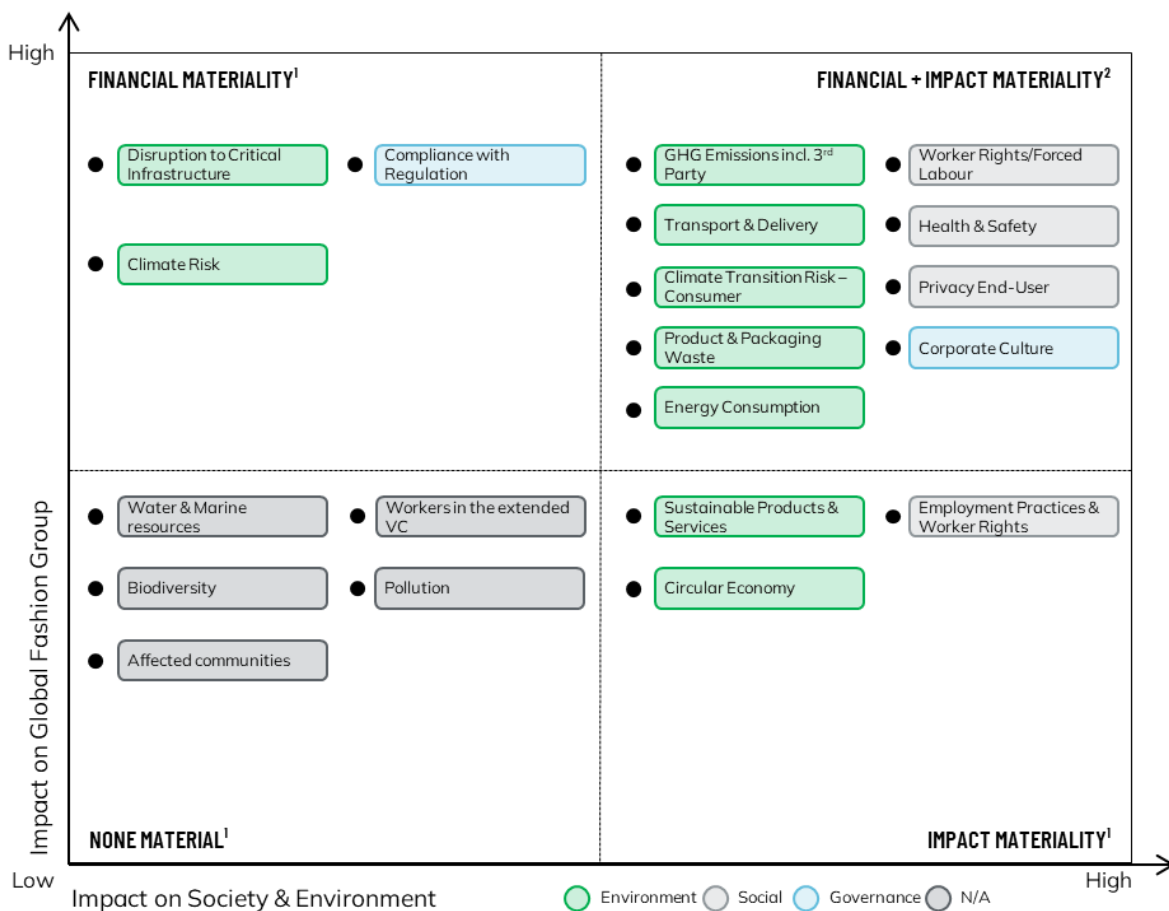
¹ Clustered on Topic level   ² On Subtopic level

E1 Climate Change

GFG recognises climate change as a material financial and environmental risk and integrates it into our Enterprise Risk Management System. Our climate risk management framework spans the short, medium, and long term, addressing transition risks, physical risks, and adaptation measures to ensure business resilience. This approach extends beyond our own operations to include value chain impacts, where relevant.

We are excited about our journey to becoming a low-carbon organisation. We are working hard to ensure our targets align with science-based targets to cut down our GHG emissions across Scopes 1, 2 and 3. GFG is committed and embraces the adoption of renewable energy where feasible, implementing energy efficiency initiatives, finding lower-emission solutions and transition our assortments and logistic solutions to a lower emissions footprint. To date, we have managed to reduce about 50% of our reliance to fossil fuel within our operations and on our way to significantly reduce our Scope 1 and 2 emissions.

We recognise that Scope 3 emissions constitute the majority of our emissions, and we understand the need for the efforts in this area. We are committed to collaborating closely with our significant value chain partners to reduce emissions, decrease reliance on fossil fuels and transition to renewable resources. Achieving this will require significant effort from both us and our entire value chain. Our current focus in this avenue is on increasing assortments with lower emissions through our brand partners and working with logistic partners that offers lower or zero emission transportation services.

Further details on climate-related risks, mitigation actions, and performance against targets are available in our ESRS E1 section of this report.

		Time Horizon		
		Short	Medium	Long
Climate Change	Risk		●	●
Climate Risk	Risk		●	●
Disruption to Critical Infrastructure	Risk		●	●
GHG Emissions	Negative impact	●	●	●
Transport & Delivery	Negative impact	●	●	●
Energy Consumption	Negative impact	●	●	●
Climate Transition Risk	Risk	●	●	

E5 Circular Economy

As a fashion and lifestyle retailer, GFG recognises the industry's environmental impacts, particularly on global warming. Sustainable fashion aims to reduce this footprint while ensuring ethical production practices. To drive positive change, GFG is committed to increasing the sale of products that meet sustainable criteria and collaborating with third-party brands to promote responsible resource stewardship. The fashion industry is a major waste generator, with environmental impacts spanning the entire product lifecycle—from resource-intensive production to end-of-life disposal. Embracing circular economy principles, GFG seeks to minimise waste, reduce reliance on finite resources, and extend product lifespans through recovery programmes, repairs, and upcycling initiatives. Beyond fashion products, circularity also applies to packaging. GFG is transitioning to sustainable packaging solutions and improving recyclability to reduce environmental impact. By integrating these strategies, GFG is working toward a more sustainable and responsible fashion industry.

		Time Horizon		
		Short	Medium	Long
Circular Economy	Opportunity	●	●	●
Product & Packaging Waste	Negative impact	●	●	
Sustainable Products & Services	Opportunity	●	●	

S1 Own Workforce

At GFG, our employees are our greatest asset, and we are committed to fostering an inclusive, diverse, and supportive workplace. We prioritise secure employment, work-life balance, diversity, training, and gender equality while upholding worker rights, including privacy, healthcare access, and social dialogue. GFG ensures compliance with local labour laws across all operating countries to mitigate risks associated with high turnover, knowledge loss, and employee dissatisfaction. Our policies guarantee fair treatment, equal opportunities, and necessary insurance coverage. Additionally, we maintain structured processes for pay and performance reviews, alongside continuous training and development. Where applicable, our commitment extends to tier 1 suppliers and Labor Service Providers, reinforcing ethical employment practices throughout our supply chain. GFG remains dedicated to enhancing the employee experience and strengthening labour standards across our operations.

		Time Horizon		
		Short	Medium	Long
Worker Rights	Risk	●	●	●
Health & Safety	Risk	●	●	●
Employment Practices	Positive impact	●	●	●

S4 Communities

Customer information is vital to GFG's ability to deliver a trusted and personalised experience. While GFG does not store critical Personally Identifiable Information ("PII"), a data breach could have financial, reputational, and individual customer impacts. To mitigate risks, GFG continuously monitors security developments, invests in internal security awareness, and maintains infrastructure in line with the latest security standards. Safeguarding customer data remains a top priority and is covered under our Governance processes.

		Time Horizon		
		Short	Medium	Long
Privacy End User	Risk	●	●	

G1 Governance

GFG upholds the highest standards of integrity and ethics in all business and stakeholder relationships. As a listed company, we expect the same from our partners to mitigate risks, including fines, litigation, and reputational damage. We continuously review local regulations and strengthen our compliance framework to ensure adherence and uphold our commitment to responsible business practices.

		Time Horizon		
		Short	Medium	Long
Compliance with Regulations	Risk	●	●	●
Corporate Culture	Positive impact	●	●	●

Review and Future Steps

Currently there is no process to integrate the DMA results into the Groups ERM process. This will be considered in the following years. GFG will review the DMA annually and update it as necessary to reflect changes in the business or regulatory environment. The frequency of revisiting and updating the DMA is set at three years if no material changes occur. As this is the first year of voluntary reporting there are no changes to the process to report.

3.4 EU TAXONOMY DISCLOSURE

Overview

Regulation (EU) 2020/852, known as Taxonomy Regulation is a key component of the European Commission's action plan to redirect capital toward a more sustainable economy. It represents an important step toward achieving carbon neutrality by 2050 in line with the EU Green Deal. The Taxonomy is a classification system for environmentally sustainable economic activities, which outlines six environmental objectives[3]. As a non-financial Group undertaking, we present the share of our Group Turnover, Capital Expenditure ("CapEx") and Operating Expenditure ("OpEx") for the financial year ended 31 December 2024, that falls within the definition of eligible and aligned economic activities set out in the Taxonomy Regulation as related to the six environmental objectives in accordance with Art. 8 Taxonomy Regulation and Art. 10 (2) of the Art. 8 Disclosures Delegated Act (EU) 2021/2178 [4].

Eligibility and Alignment Assessments

Eligibility Assessment

After reviewing all relevant divisions and functions, we concluded that no part of our Turnover is eligible, as our revenue-generating economic activities are not currently covered by the Climate Delegated Act, including the Delegated Act amending the Climate Delegated Act, or the Environmental Delegated Act and are consequently Taxonomy-non-eligible[5].

However, we identified a limited number of activities that contribute to the CapEx and OpEx KPIs, under the Climate Change Mitigation ("CCM") and Circular Economy ("CE") objectives:

- We consider the renovation of fulfilment centres in Brazil, the renovation of a new office in Australia, renovation of fulfilment centre in Hong Kong, and renovation of offices in Malaysia and Vietnam to be eligible under the renovation of existing buildings activity (CCM 7.2, CE 3.2)
- We consider the newly leased office spaces in Australia, Hong Kong and Vietnam to be eligible under the acquisition and ownership of buildings activity (CCM 7.7)

De minimis activities:

The following activities were identified as potentially eligible during our initial Taxonomy assessment but have then been discarded after an analysis of the associated turnover, OpEx and CapEx due to their insignificant value as compared to our overall turnover, Taxonomy defined OpEx and CapEx. As a result, we have deemed those activities to be "de minimis" and we will not report on them as part of our Taxonomy disclosures:

- 4.1 Electricity generation using solar photovoltaic technology
- 7.3 Installation, maintenance and repair of energy efficiency equipment
- 5.6 Marketplace for the trade of second-hand goods for reuse

Alignment Assessment

The Technical Screening Criteria ("TSC"), consisting of Substantial Contribution Criteria ("SCC") and Do No Significant Harm ("DNSH") criteria, as well as the Minimum Safeguards ("MS") criteria, were used to assess each activity outlined above and the relevant KPIs are reported in this section's disclosure tables.

The eligible activities were subject to the TSC for climate change mitigation ("CCM"). TSC for activity 7.2 under the CCM objective outline that the activity must comply with the applicable requirements for "major renovations" or alternatively lead to a reduction of Primary Energy Demand ("PED") of at least 30%. Our review found that the Group could not evidence activities under 7.2 as meeting these criteria.

TSC for activity 7.7 under the CCM objective outline that the activity must comply with the following requirement: for buildings built before 31 December 2020, the building must have at least an Energy Performance Certificate ("EPC") class A. As an alternative, the building is within the top 15% of the national or regional building stock expressed as operational PED and

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[3]*Climate change mitigation, climate change adaptation, protection of water and marine resources, transition to circular economy, prevention of pollution and protection of biodiversity and ecosystems.*
[4]*Taxonomy-eligible means an economic activity that is described in the delegated acts, irrespective of whether that economic activity meets any or all of the technical screening criteria laid down in those delegated acts. Taxonomy-aligned means an economic activity that complies with the technical screening criteria laid down in the relevant delegated acts and is carried out in compliance with the minimum safeguards regarding human and consumer rights, anti-corruption and bribery, taxation and fair competition. To meet the technical screening criteria, an economic activity contributes substantially to one or more environmental objectives while not doing significant harm to any of the other environmental objectives.*
[5] *Commission Delegated Regulation (EU) 2021/2139 of 4 June 2021 establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to climate change mitigation or climate change adaptation and for determining whether that economic activity causes no significant harm to any of the other environmental objectives. Commission Delegated Regulation (EU) 2023/2486 of 27 June 2023 establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to protection of water and marine resources, transition to a circular economy, prevention of pollution or protection of biodiversity and ecosystems and for determining whether that economic activity causes no significant harm to any of the other environmental objectives.*

demonstrated by adequate evidence, which at least compares the performance of the relevant asset to the performance of the national or regional stock built before 31 December 2020 and at least distinguishes between residential and non-residential buildings; for buildings built after 31 December 2020, the building meets the criteria specified in Section 7.1 (Annex I to the Climate Delegated Act), construction of new buildings, that are relevant at the time of the acquisition; and where the building is a large non-residential building with an effective rated output for heating systems, systems for combined space heating and ventilation, air-conditioning systems or systems for combined air-conditioning and ventilation of over 290 kW, it is efficiently operated through energy performance monitoring and assessment.

Our review indicates that although the newly leased office building in Australia holds the Australian 6 Star Green Star and 6 Star NABERS Energy ratings, this alone does not sufficiently demonstrate that the building ranks within the top 15% of national or regional building stock in terms of operational PED. We also acknowledge that our newly acquired building leases in Hong Kong and Vietnam do not currently meet the EU Taxonomy's technical screening criteria for substantial contribution to climate change mitigation. These buildings lack the required Energy Performance Certification and cannot demonstrate that their PED is within the top 15% of the national or regional building stock. Therefore, the Group's activities under 7.7 did not meet the criteria.

The relevant eligible activities were evaluated against the TSC for the CE objective. For activity 3.2, compliance requires adherence to EU waste legislation and the EU Construction and Demolition Waste Management Protocol. This includes calculating and disclosing the GWP of renovation works upon request, supporting circularity through adaptable and deconstructable designs, retaining at least 50% of the original building, and minimising the use of primary raw materials by incorporating secondary materials within specified thresholds. Additionally, electronic tools must document building characteristics for future maintenance and reuse, with information stored digitally and preserved long-term using national systems. We have determined that our activities under 3.2 do not fully align with all TSC, except for retaining more than 50% of the original building. Consequently, this misalignment affects the classification of our CapEx and OpEx towards CE 3.2.

Our Taxonomy-Aligned Activities

For 2024 and 2023, the Group's review of the activities under 7.2 and 7.7 found that the activities did not meet the substantial contribution criteria. The Group will continue to monitor its activities to align against EU Taxonomy objectives.

Table 4: Proportion of Taxonomy-Eligible Activities

	Total (€m)	Proportion of Economic Activities		
		Taxonomy-Eligible (non-aligned)	Taxonomy-Aligned	Taxonomy-Non-Eligible
FY2024				
Turnover	743.5	-	-	100%
CapEx	30.0	18.3%	-	81.7%
OpEx	9.2	13.7%	-	86.3%
FY2023				
Turnover	838.0	-	-	100.0%
CapEx	30.4	4.5%	-	95.5%
OpEx	10.7	8.9%	-	91.1%

DNSH Assessment

For all eligible economic activities in Table 4, the Group was not able to demonstrate a substantial contribution to climate change mitigation using the TSC and therefore no analysis against the DNSH criteria was conducted.

Minimum Safeguards Assessment

There have been no changes to the Group's prior year review of its internal and external policies' compliance with Minimum Safeguards. The Taxonomy states that for an activity to be considered as being environmentally sustainable, it must be carried out in alignment with the following standards for responsible business conduct:

1. OECD Guidelines for Multinational Enterprises

2. UN Guiding Principles ("UNGP") on Business and Human Rights, including the declaration on Fundamental Principles and Rights at Work of the International Labour Organisation ("ILO") and the eight fundamental conventions of the ILO

3. The International Bill of Human Rights

As the Group's economic activities in 2024 did not meet the substantial contribution criteria, the updated changes to the OECD Guidelines have not yet been considered.

KPIs and Accounting Policy

GFG performed a top-down assessment of potentially eligible economic activities as per those listed in the following EU delegated acts:

- Climate DA (EU) 2021/2139
- Climate DA on nuclear and gas (EU) 2022/1214
- Environmental DA (EU) 2023/2486
- DA amending the Climate DA (EU) 2023/2485

The Company then completed a detailed verification of these activities against the Taxonomy. This required close cooperation with GFG's three regions and consultation with technical experts related to the specific activities and criteria.

The KPIs include Turnover, CapEx and OpEx. For presenting the taxonomy KPIs, a numerator and denominator must be determined. The Group's KPI values for eligible activities are collated via the local financial reporting systems and translated into Euros at the average FX rate for the year. Costs are reviewed on an individual basis for eligibility and due to the limited number of eligible activities there is minimal risk of double counting in the allocation of Turnover, CapEx and OpEx KPIs across economic activities. Direct costs for training and other human resources adaptation needs are excluded from the OpEx denominator and OpEx numerator.

KPI Numerator

As no significant eligible Turnover was identified by the Group, the Turnover numerator is nil. The CapEx and OpEx numerators consist of the taxonomy-eligible items in Tables 5 and 6.

Table 5: CapEx Numerator Breakdown

FY 2024	Total (€m)
Property, plant & equipment: renovation of existing buildings	0.8
Right-of-use assets: acquisition and ownership of buildings	4.7
CapEx Numerator	**5.5**

Table 6: OpEx Numerator Breakdown

FY 2024	Total (€m)
R&D costs (mainly tech payroll costs)	-
Building renovation costs (included in maintenance/repair costs)	-
Short-term leases	-
Maintenance and repair costs	1.3
All other direct costs necessary to operate PPE or ROU assets	-
OpEx Numerator	**1.3**

KPI Denominator

The Turnover denominator is calculated in line with IFRS 15 and reconciles to Revenue presented on the Group's Consolidated Statement of Profit or Loss on page 47 of GFG's FY2024 Annual Report released on 5 March 2025.

The CapEx denominator consists of the additions to tangible and intangible fixed assets during the financial year, before depreciation, amortisation, and any remeasurements, including those resulting from revaluations and impairments, as well as excluding changes in fair value. It includes the following:

- Acquisition costs of property, plant and equipment and intangible assets in line with IAS 16
- Acquisition of intangibles in line with IAS 38
- Acquisition of right-of-use assets in line with IFRS 16

See additions as of 31 December 2024 in GFG's Annual Report on page 77 for property, plant and equipment, page 80 for intangible assets and page 78 for right-of-use assets.

The OpEx denominator is calculated as the following direct non-capitalised costs: research & development costs, building renovation costs, short term leases, maintenance and repair costs and any other direct expenditures relating to the day-to-day servicing of assets of property, plant and equipment by the undertaking or third party to whom activities are outsourced that are necessary to ensure the continued and effective functioning of such assets. The Turnover, Capex and OpEx denominator figures are all collected from the local financial reporting systems and consolidated to Group figures.

The increase in the CapEx numerator from €1.3m in 2023 to €5.5m to 2024 relates to the new lease in Australia (€4.1m).

Nuclear and Gas Activities

As we are not affected by the economic activities related to gas and nuclear energy, the specific templates 2 to 5 outlined in the Complementary Climate Delegated Act are not disclosed. See Table 7: Template 1 Nuclear and Fossil Gas Related Activities.

Table 7: Template 1 Nuclear Energy and Fossil Gas Related Activities

Nuclear Energy Related Activities		
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	No
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	No
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	No
Fossil Gas Related Activities		
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	No
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	No
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	No

EU Taxonomy Indicators

EU Taxonomy Indicators: 2024 Turnover

Economic Activities	Code	Turnover, 2024	Proportion of Turnover, 2024	Substantial Contribution Criteria						DNSH Criteria ("Do No Significant Harm")						Minimum Safeguards	Proportion of Taxonomy Aligned or Eligible Turnover, 2023	Category (enabling activity)	Category (transitional activity)
				Climate Change Mitigation	Climate Change Adaptation	Water and Marine Resources	Pollution	Circular Economy	Biodiversity	Climate Change Mitigation	Climate Change Adaptation	Water and Marine Resources	Pollution	Circular Economy	Biodiversity				
		€m	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N	Y; N	Y; N	Y; N	Y; N	Y; N	Y; N	%	E	T
A. Taxonomy eligible activities																			
A.1. Environmentally sustainable activities (taxonomy-aligned)																			
Turnover of environmentally sustainable activities		0	0	0%	0%	0%	0%	0%	0%	-	-	-	-	-	-	-	-		
Of which enabling		0	0	0%	0%	0%	0%	0%	0%	-	-	-	-	-	-	-	-	-	
Of which transitional		0	0	0%						-	-	-	-	-	-	-	-		-
A.2. Taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned activities)																			
				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL										
Turnover of taxonomy eligible but not environmentally sustainable activities		0	0	0%	0%	0%	0%	0%	0%								0		
Turnover of Taxonomy-eligible activities (A.1. + A.2.)		0	0	0%	0%	0%	0%	0%	0%								0		
B. Taxonomy non-eligible activities																			
Turnover from taxonomy non-eligible activities		743.5	100																
Total (A + B)		**743.5**	**100**																

Activity Name	Proportion of Turnover/Total Turnover	
	Aligned per Objective	Eligible per Objective
CCM	0%	0%
CCA	0%	0%
WTR	0%	0%
CE	0%	0%
PPC	0%	0%
BIO	0%	0%

EU Taxonomy Indicators: 2024 Operational Expenditure

Economic Activities	Code	OpEx, 2024	Proportion of OpEx, 2024	Substantial Contribution Criteria						DNSH Criteria ("Do No Significant Harm")						Minimum Safeguards	Proportion of Taxonomy Aligned or Eligible OpEx, 2023	Category (enabling activity)	Category (transitional activity)
				Climate Change Mitigation	Climate Change Adaptation	Water and Marine Resources	Pollution	Circular Economy	Biodiversity	Climate Change Mitigation	Climate Change Adaptation	Water and Marine Resources	Pollution	Circular Economy	Biodiversity				
		€m	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N	Y; N	Y; N	Y; N	Y; N	Y; N	Y; N	%	E	T
A. Taxonomy eligible activities																			
A.1. Environmentally sustainable activities (taxonomy-aligned)																			
OpEx of environmentally sustainable activities		0	0	0%	0%	0%	0%	0%	0%	-	-	-	-	-	-	-	-		
Of which enabling		0	0	-	0%	0%	0%	0%	0%	-	-	-	-	-	-	-	-	-	
Of which transitional		0	0	0%						-	-	-	-	-	-	-	0		-
A.2. Taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned)																			
				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL										
Renovation of existing buildings	**CCM 7.2**, CE 3.2	1.3	13.7	EL	N/EL	N/EL	N/EL	EL	N/EL								8.9		
OpEx of taxonomy-eligible but not environmentally sustainable activities		1.3	13.7	13.7%	0%	0%	0%	0%	0%								8.9		
OpEx of taxonomy-eligible activities (A.1. + A.2.)		1.3	13.7	13.7%	0%	0%	0%	0%	0%								8.9		
B. Taxonomy non-eligible activities																			
OpEx from taxonomy non-eligible activities		7.9	86.3																
Total (A + B)		9.2	100																

Proportion of OpEx/Total OpEx

Activity Name	Aligned per Objective	Eligible per Objective
CCM	0%	13.7%
CCA	0%	0%
WTR	0%	0%
CE	0%	13.7%
PPC	0%	0%
BIO	0%	0%

EU Taxonomy Indicators: 2024 Capital Expenditure

Economic Activities	Code	CapEx, 2024	Proportion of CapEx, 2024	Substantial Contribution Criteria						DNSH Criteria ("Do No Significant Harm")						Minimum Safeguards	Proportion of Taxonomy Aligned or Eligible CapEx 2023	Category (enabling activity)	Category (transitional activity)
				Climate Change Mitigation	Climate Change Adaptation	Water and Marine Resources	Pollution	Circular Economy	Biodiversity	Climate Change Mitigation	Climate Change Adaptation	Water and Marine Resources	Pollution	Circular Economy	Biodiversity				
		€m	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N	Y; N	Y; N	Y; N	Y; N	Y; N	Y; N	%	E	T
A. Taxonomy eligible activities																			
A.1. Environmentally sustainable activities (taxonomy-aligned)																			
CapEx of environmentally sustainable activities		0	0	0%	0%	0%	0%	0%	0%	-	-	-	-	-	-	-	-		
Of which enabling		0	0	0%	0%	0%	0%	0%	0%	-	-	-	-	-	-	-	-		
Of which transitional		0	0	0%						-	-	-	-	-	-	-	0		
A.2. Taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned)																			
				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL										
Renovation of existing buildings	**CCM 7.2**, CE 3.2	0.8	2.7	EL	N/EL	N/EL	N/EL	EL	N/EL								3.0		
Acquisition and ownership of buildings	**CCM 7.7**	4.7	15.6	EL	N/EL	N/EL	N/EL	EL	N/EL								1.5		
CapEx of taxonomy-eligible but not environmentally sustainable activities		5.5	18.3	18.3%	0%	0%	0%	0%	0%								4.5		
CapEx of taxonomy-eligible activities (A.1. + A.2.)		5.5	18.3	18.3%	0%	0%	0%	0%	0%								4.5		
B. Taxonomy non-eligible activities																			
CapEx from taxonomy non-eligible activities		24.5	81.7																
Total (A + B)		**30.0**	**100**																

Activity Name	Proportion of CapEx/Total CapEx	
	Aligned per Objective	Eligible per Objective
CCM	0%	18.3%
CCA	0%	0%
WTR	0%	0%
CE	0%	2.7%
PPC	0%	0%
BIO	0%	0%

4. ESRS E1 – CLIMATE CHANGE

4.1 OUR STRATEGY AND APPROACH TO CLIMATE CHANGE

ESRS E1.1 – Transition plan for climate change mitigation

Global Fashion Group recognises the critical role that related entities in the ecommerce and fashion industry must play in implementing effective climate actions to combat climate change. Our climate change mitigation and adaptation strategy is guided by the People and Planet Positive Strategy framework, which was established and approved by the Group's Supervisory Board in 2021.

Our People and Planet Positive Strategy continues to guide our actions towards mitigating climate impacts and transitioning to a low-carbon economy that is in line with the Paris Agreement. Our climate action plan outlines specific targets and actions for our operations to transition to a low-carbon economy. Our emissions reduction target was validated by the Science Based Targets initiative ("SBTi") in 2022, and we are currently updating these targets to reflect significant changes in our operations, including the divestment of our CIS region, the closure of our Argentinian operations, as well as an evolving business model. The updated science-based emissions reduction targets are described further in the climate-related targets section.

GFG demonstrates its commitment to transitioning to a low-carbon economy through strategic investments and are focused on the following decarbonisation levers:

- Promoting Sustainable Products and Services: Collaborating with suppliers to enhance product sustainability and offer a more sustainable and low-emission assortment.
- Encouraging Low-Emission Logistics: Partnering with logistics providers to implement lower emission transport and distribution.
- Responsible Sourcing and Resource Preservation: Upholding responsible sourcing practices and promoting the preservation of natural resources throughout our supply chain.
- Adopting Renewable Energy: Increasing our use of renewable energy through direct sourcing or self-generation to power our operations.
- Electrification of Machinery and Systems: Electrifying machinery and systems where feasible to decrease carbon emissions and enhance energy efficiency.
- Implementing Energy-Efficient Technologies: Investing in novel and energy-efficient technologies to reduce energy consumption and minimise our carbon footprint across operations. Examples include installation of LED lighting.
- Invest in Energy Attribute Certificates ("EACs") to supplement renewable energy supply when supply is limited or not viable.
- Invest in carbon offset when all other avenues have been exhausted

To date, GFG has significantly reduced its Scope 1 and Scope 2 emissions as those emissions make up roughly 1% of the entire Group's emissions. Our emissions largely fall under Scope 3, originating primarily from indirect sources within our upstream and downstream value chain including product manufacturers, logistics and service providers. A definitive transition approach for the value chain requires participation of all value chain stakeholders. Our approach to transition value chain stakeholders is influenced by the maturity of our brands and suppliers, their readiness to transition, evolving customer demands, and regulatory pressures in our operational regions. We are placing a target to reduce our Scope 3 emissions intensity, 55% by 2030. Towards that end, there is a necessity of significant engagement with our value chain stakeholders, including brands, suppliers, and customers, to address key transition concerns and achieve the emissions reductions necessary to meet the Paris Agreement's 1.5°C target. We plan to facilitate this engagement through collaborative forums with our major brands and suppliers. Due to the complex nature of our business, anticipated allocation of resources and financial implications to transition our value chain to a lower carbon economy is difficult to quantify and justify. We will attempt to value this when capacity and mutual understanding has been reached within the value chain.

The Group reports on its investments, capital expenditures ("CapEx"), and operational expenditures ("OpEx") in line with the requirements of Commission Delegated Regulation (EU) 2021/2178. As and when possible, the Group will quantify and qualify its economic activities utilising the technical screening criteria defined in Commission Delegated Regulation (EU) 2021/2139. Please refer to the EU Taxonomy section of this report for further information. GFG has no CapEx invested in coal, oil or gas-related activities, reflecting our commitment to steering away from fossil-based economies.

To ensure constant accountability, our Supervisory Board's Sustainability Committee will review and advise on the development of our transitional approaches while aligning to our strategic People and Planet Positive objectives.

As a leading fashion and lifestyle ecommerce retailer, Global Fashion Group operates with a light asset base, meaning we do not maintain our own fleet or own the facilities in which we operate. This operational model minimises our GHG emissions, as the systems and mechanisms installed on-site do not contribute significantly to potential locked-in GHG emissions. Our key assets, fashion and lifestyle products and own-brand goods including last-mile packaging are managed to ensure minimal GHG locked-in scenario and minimal environmental impact.

Currently, GFG is not included in any Paris-aligned Benchmarks.

4.2 CLIMATE-RELATED IMPACTS, RISKS AND OPPORTUNITIES

E1.IRO-1 – Description of the processes to identify and assess material climate-related impacts, risks and opportunities
ESRS 2 E1.SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

The Group has established a comprehensive climate impact, risk, and opportunities assessment process aligned with the Task Force on Climate-Related Financial Disclosures ("TCFD") recommendations. This process integrates climate risk into the core Enterprise Risk Management ("ERM") system, anchored to ISO 31000 methodology, addressing both physical and transition risks systematically. The identified risks are captured in our Climate Risk Register. The approach involves identifying, analysing, evaluating, treating, monitoring, and reporting on climate-related risks and opportunities, ensuring resilience and sustainability across operations and the value chain. Regular reviews and updates incorporate the latest scientific data and regulatory developments, keeping the Company at the forefront of climate risk management.

This involves identifying potential climate-related hazards such as extreme weather events, water scarcity, changing precipitation patterns, and rising sea levels. The assessment evaluates the impact of these hazards on GFG's assets, infrastructure, and business activities, informed by high-emission climate scenarios to ensure comprehensive risk identification and mitigation planning. Collaboration with external experts and stakeholders enhances the accuracy and effectiveness of these assessments, addressing potential vulnerabilities.

The Group has also identified and evaluated the both physical and transition risks over medium- (2030) and long-term (2050) time horizons. The assessment provides continuous monitoring and reassessment of the climate-related risks to ensure timely and effective management. A horizon scanning of the Group's assets and business activities determines their exposure to climate-related hazards, with an adoption of analytical tools and climate models. Additionally, the Group evaluates transition risks and opportunities, considering the relevant regulatory changes, market shifts, and technological advancements.

The transition risk assessment was conducted under two Paris-aligned low carbon transition scenarios from the International Energy Agency ("IEA"). The physical risk assessment was conducted under two climate Shared Socioeconomic Pathway ("SSP") scenarios from the Intergovernmental Panel on Climate Change ("IPCC") SSP5-8.5, the "business-as-usual" 4.4°C scenario. The financial quantification of identified impacts, risks and opportunities is expected to be evaluated in 2025.

Risk Assessment Scenarios	Transition Risk	Physical Risk
Greater than 2°C or BAU Scenario	In the Stated Policies Scenario (STEPS, >2°C), the analysis focuses on the implications of existing and announced governmental policy measures. This scenario assumes that governments will implement their stated policy intentions and targets, leading to a global temperature increase exceeding 2°C by the end of the century. Evaluating this scenario allows the Group to identify the risks and opportunities in a context where policy measures are enacted but are insufficient to meet the targets of the Paris Agreement.	In the SSP5-8.5 scenario, often referred to as the "business-as-usual" scenario, the world experiences high emissions with minimal mitigation efforts, resulting in a global temperature increase of approximately 4.4°C by the end of the century. This scenario assumes rapid economic growth and energy-intensive approach by the world and is heavily reliant on fossil fuels.
Lower than 2°C or Low-Carbon Scenario	In the Sustainable Development Scenario (SDS, <2°C), the focus is on aligning with the Paris Agreement's objective of limiting global temperature rise to well below 2°C, with an aspiration to reach below 1.5°C. This scenario assumes a rapid and widespread adoption of low-carbon technologies alongside significant policy interventions. Evaluating this scenario enables the Group to prepare for a future where stringent climate policies and technological advancements drive the transition to a low-carbon economy.	In the SSP2-4.5 scenario, known as the "low-carbon" 2°C scenario, the world undertakes moderate mitigation efforts, resulting in the stabilisation of global temperatures around 2°C above pre-industrial levels by the end of the century. This scenario assumes a middle-of-the-road development pathway, where social, economic, and technological trends continue without significant deviation from historical patterns.

GFG is strategically adapting its strategy and business model to address the complex challenges posed by climate change. The assessment has identified both transition and physical risks associated with these challenges and is highlighted below.

Table 8: GFG Transition Risks and Opportunities

Category	Risk and Opportunities	2030	2050
Policy & Legal Risk	Carbon pricing	Moderate	Significant
	Regulations impacting marine & aviation industry	Insufficient	Extensive
Market Risk	Customers' demand for green products	Moderate	Significant
Technology Risk and Opportunity	Low carbon land transportation	Negligible	Extensive
	Technology deployment for reducing emissions	Insufficient	Extensive
Market Opportunity	Circularity and sustainability in procurement of raw materials and products	Negligible	Extensive
Reputation Opportunity	Sustainability and greener brand	Negligible	Significant
	Climate change related reputation impact	Moderate	Significant

Table 9: GFG Combined Physical Risks (likelihood x impact)

Scenario	Physical Risks	2030	Score	2050	Score
SSP2–4.5	Water scarcity	Low	2	Low	2
Low Carbon Scenario	Riverine floods	Low	2	Moderate	3
	Coastal floods	Very Low	1	Very Low	1
	Extreme heat	Moderate	3	High	4
	Cyclone	Low	2	Low	2
	Landslides	Very Low	1	Low	2
SSP5–8.5	Water scarcity	Low	2	Low	2
Business-as-usual Scenario	Riverine floods	Low	2	Moderate	3
	Coastal floods	Very Low	1	Very Low	1
	Extreme heat	High	4	Very High	5
	Cyclone	Low	2	Low	2
	Landslides	Low	2	Low	2

The Group has identified potential risks and mapped their impacts and developed an overarching strategy to mitigate them. Assessment on the magnitude of financial impacts of these risks and the implementation of mitigation strategies will be undertaken in 2025.

Table 10: GFG Climate Risk Impacts & Mitigation Approaches

Risk Type	Risk	Description	Impact to GFG	Mitigation Approach
Transition	Carbon pricing	New or increasing GHG taxes or the introduction of emissions trading systems in the geographies where GFG operates or procures raw materials or products	Limited direct impact as a result of GFG's low carbon footprint, with indirect impact from increased operating costs over a longer-term period	Proactive engagement with policymakers, continuous monitoring of regulatory developments, and investment in compliance technologies
Transition	Regulations impacting marine & aviation industry	Ambition for the marine and aviation industry to reduce GHG emissions could result in increased transportation costs both upstream and downstream for GFG	Higher transportation costs resulting from cost structural changes in both the marine & aviation industries	Diversifying transportation methods, investing in more efficient logistics, and engaging with industry stakeholders

Risk Type	Risk	Description	Impact to GFG	Mitigation Approach
Transition	Customer demand for green products	Increasing demand for low-carbon, sustainable products could affect demand for GFG products (own brand and others)	Potential loss of market share for non-compliant products	Diversifying product offerings, investing in sustainable product development, and enhancing marketing strategies to highlight sustainability efforts
Transition	Low-carbon land transportation	Increasing demand for low-carbon, sustainable land transportation options	Potential increase in logistics and last-mile delivery costs	Investing in low-carbon transportation options and optimising logistics for efficiency
Physical	Extreme heat	Higher maximum temperatures and longer warm spells are projected across all scenarios, especially by 2050	Increased risk of fire at the fulfilment centres; a higher operational cost potential due to higher cooling demands; potential health risks to employees	Implementing heat management measures, adopting risk transfer strategies, enhancing building insulation, and ensuring adequate cooling systems
Physical	Riverine floods	Rising precipitation levels are expected to increase the frequency and severity of riverine floods	Damage to infrastructure, disruption of supply chains, and potential business interruptions or operational shutdowns	Maintaining good drainage systems at facilities, and developing crisis response and business continuity plans to ensure operational resilience
Physical	Cyclones	Increased intensity and frequency of cyclones in certain regions	Potential physical damage to assets; potential loss of life; potential business interruptions or operational shutdowns	Enhancing structural resilience, developing emergency response and business continuity plans to ensure operational resilience
Physical	Landslides	Intensified consecutive rainfall and extreme weather events trigger landslides, particularly in hilly or mountainous areas	Damage to infrastructure, road blockages, and potential operational disruptions	Developing emergency response and business continuity plans for regions at risk of landslides, to ensure operational resilience
Physical	Water scarcity	Changing precipitation patterns and increased temperatures can lead to water scarcity in certain regions	Reduced water availability for operations, increased costs for water, and potential conflicts with local communities	Implementing water-saving technologies, recycling and reusing water, and engaging in water stewardship initiatives
Physical	Coastal floods	Rising sea levels and increased storm surges can lead to coastal flooding	Damage to coastal infrastructure, loss of land, disruption of supply chain and potential business interruptions or operational shutdowns	Maintaining good drainage systems at own facilities, and developing flood response plans

Table 11: GFG Climate Transition Opportunities

Opportunity	Description	Impact to GFG	Strategy
Circularity and sustainability in procurement of raw materials and products	Potential for innovation in sourcing sustainable raw materials and products.	New revenue streams, enhanced competitive advantage, and improved market positioning	Invest in sustainable procurement practices and transition from a linear to a circular model, focusing on minimising product-related emissions and waste while providing end-of-life solutions
Sustainable brand	Building a brand reputation around sustainable practices	Increased stakeholder trust especially customer loyalty and market share	Clearly communicate our sustainability initiatives and the availability of sustainable product assortments to empower customers to make choices that reduce their climate impact
Reputation	Stakeholders' view of GFG impacts revenues and costs, as well as the cost of capital, which has a direct impact on valuation	Meeting investor expectations and improving access to capital	Maintain transparent public disclosure of our climate strategy through credible frameworks such as ESRS and TCFD

4.3 CLIMATE ACTION

E1-2 – Policies related to climate change mitigation and adaptation
E1-3 – Actions and resources in relation to climate change policies

Global Fashion Group is committed to climate action as a key part of our People & Planet Positive Strategy. This framework guides us in effectively managing climate impact, risks, and opportunities. We align with the GHG Protocol for carbon accounting, enabling us to set science-based targets through the Science Based Targets initiative ("SBTi"). This supports regular monitoring, transparent reporting, and continuous improvement in our climate strategies.

We integrate climate risks into our operations via GFG's Enterprise Risk Management framework, using scenario analysis to develop strategies that mitigate risks and seize opportunities. GFG implements energy-efficient technologies, such as LED lighting and solar panels, and seeks renewable energy sources to minimise emissions. We invest in infrastructure resilience to withstand climate-related risks and ensure operational continuity through supply chain diversification and water conservation measures.

GFG enhances its climate action capabilities by fostering collaboration and creating shared value across our value chain. We aim to set collaborative climate targets and integrate climate performance metrics into our processes. Our participation in industry initiatives, such as the Better Cotton Initiative, Textile Exchange, Seamless (via The Iconic) and CEO Action Network (via Zalora), drives collective climate action and sets industry standards. Employee awareness programmes empower our workforce to contribute to sustainability efforts and drive our climate action.

Recognising that most emissions are Scope 3, related to assortments, logistics, product use, and end-of-life, GFG focuses on transitioning to sustainable materials and curation of low-emission and sustainable brands. We promote recycled and natural fibres, encourage regenerative materials, and develop a transparent emissions monitoring system. To ensure lower product use and end-of-life emissions, the provision of more timeless, durable and high-quality products with longer lifespans is envisioned. Providing circular solutions, such as product takeback, resale and repair also implemented to optimise resource efficiency and minimise carbon footprints (Refer to E5 disclosure section for more information). Our low-carbon logistics approach involves collaborating with third-party providers to scale low-emission delivery methods.

GFG is actively implementing strategies to enhance climate resilience and sustainability. In 2025, we will evaluate the financial requirements associated with these initiatives. Due to the complexity and evolving nature of our climate action strategies, we are unable to provide exact values for resource allocation currently. However, we are committed to gathering the necessary data and insights to ensure that our strategies are not only effective but also financially sustainable. We will update stakeholders with detailed resource allocation values as soon as they become available, ensuring transparency and accountability in our climate action efforts. By implementing these strategies, GFG enhances resilience and competitiveness, creating opportunities for innovation, growth, and long-term value creation in a changing climate landscape.

4.4 CLIMATE-RELATED TARGETS

*E1-4 – Targets related to climate change and mitigation*

GHG Emissions Reduction Targets

GFG targets to reduce its GHG emissions in line with the global 1.5°C target. For this to happen, we are setting ourselves the following revised targets and to seek validation of those targets from SBTi in 2025.

Target Status	Scope 1 and Scope 2 Absolute Target	Scope 3 Intensity Target	Base Year	Target Year	Align with Paris 1.5ºC Target
SBTi validated target (2022)	50% absolute reduction in Scope 1 & Scope 2 emissions from base year emissions	90% reduction per million Net Merchandise Value from base year emissions intensity	2019	2030	Yes
Revised target to be validated	50% absolute reduction in Scope 1 & Scope 2 emissions from base year emissions	55% reduction per million Net Merchandise Value from base year emissions intensity	2019	2030	Yes

Although Scope 1 and 2 emissions represent a smaller segment of our overall emissions profile, we remain firmly committed to reducing these emissions. Our reduction targets align with the 1.5°C ambition, employing the most practical and effective strategies available. We have pinpointed key levers for reduction, based on the accessibility of emissions reduction opportunities, availability of renewable energy sources, and transitional measures. This approach includes enhancing energy efficiency and optimisation, electrifying machinery such as forklifts, utilising lower-emission transportation options, and increasing our procurement of renewable energy and renewable energy certificates.

Figure 3: Scope 1 & 2 Absolute Emissions Reduction 2030 Target
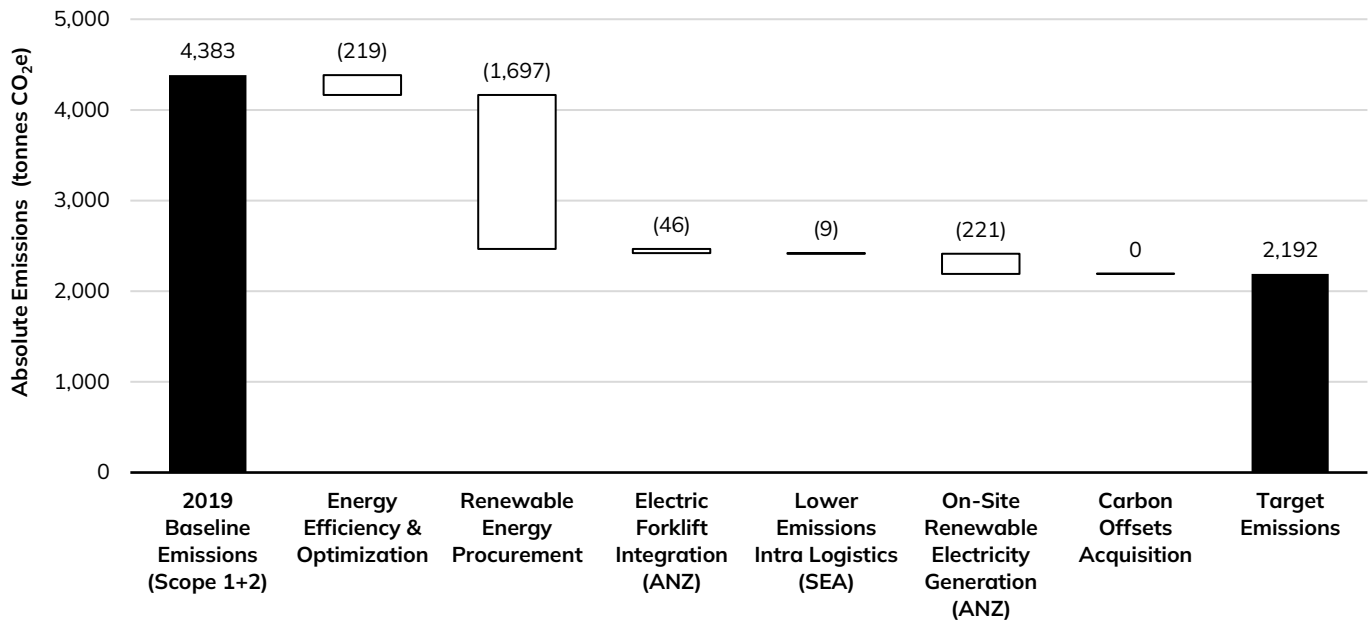
Global Fashion Group is committed to reducing the environmental impact of products sold on its platforms by focusing on Scope 3 emissions, which constitute most of its carbon footprint. Our target for reducing Scope 3 emissions intensity is based on a conservative estimate of NMV growth and a realistic assessment of potential improvements within our value chain, considering the maturity of our brands and suppliers. This target highlights the importance of enhancing GFG's capacity to engage the value chain in developing a collaborative climate action programme. A key aspect of this strategy is encouraging value chain members to disclose their energy and carbon footprints, set science-based targets, and incorporate alternative, more sustainable materials.

To achieve these goals, GFG recognises the need for effective education and reliable data acquisition, particularly regarding the value chain's dependency on fossil fuels and its significant environmental footprint in producing fashion and lifestyle assortments. By fostering a collaborative approach to climate action, GFG aims to transition the value chain towards renewable energy sources, reduce harmful emissions, and increase the use of sustainable materials. Additionally, implementing circular economy practices, from packaging to product assortment, is crucial. These efforts are designed not only to reduce GFG's own carbon footprint but also to encourage suppliers and partners to adopt similar practices, thereby amplifying the impact across the entire value chain.

Figure 4: Scope 3 Emissions Intensity Reduction 2030 Target
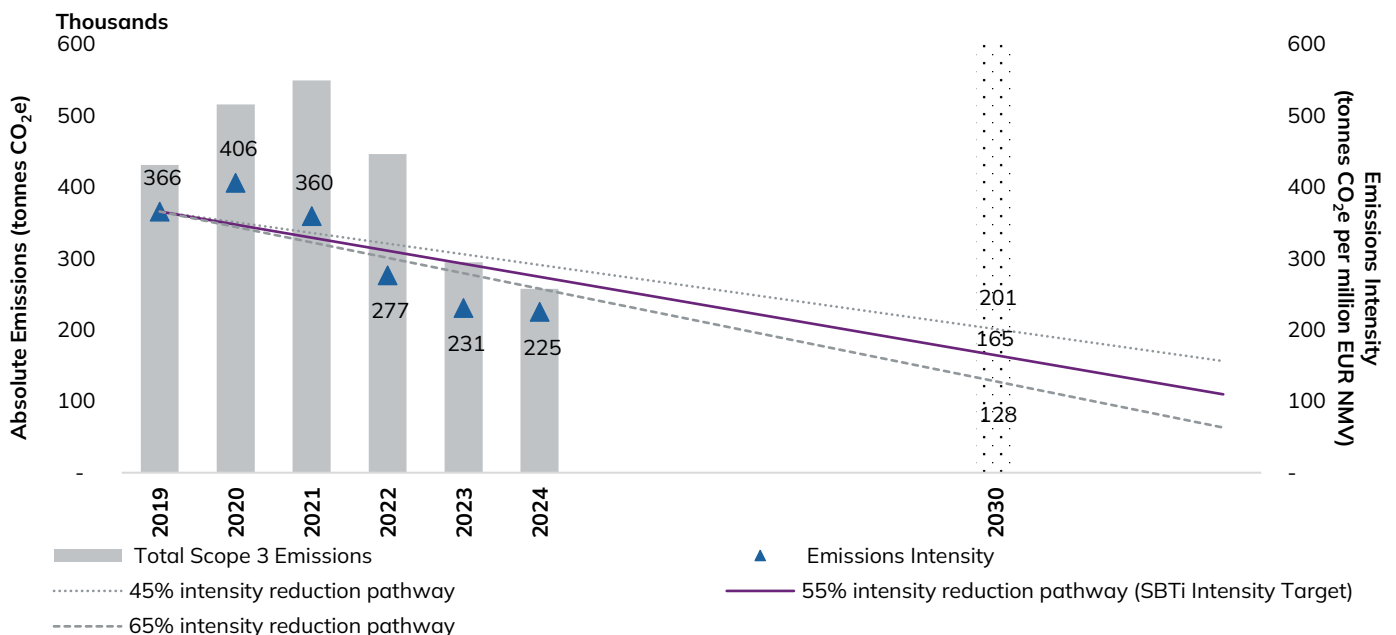
Other Climate-Related Targets

The following are GFG's targets, designed to contribute towards our efforts in reducing our GHG emissions as well as climate impact footprint.

Action	Target	Objective	Target Ambition	2025 Target	2030 Target	2024 Progress
Lower emissions logistics	By 2030, GFG will work with 3PL providers that provide more than 50% zero or low emission methods (EV, bicycles, walking) for last mile delivery	To reduce our Scope 3 emissions, (Category 9) related to last mile deliveries	Quantitative	5%	18%	8.9%
Renewable energy & energy efficiency	By 2030 all GFG operating fulfilment centres and offices will be sourcing renewable energy	To reduce our Scope 2 emissions at our fulfilment centres and offices	Quantitative	16%	100%	27%
Sustainable assortment	% of sold units that fulfil one or more Sustainable Product criteria	To reduce our Scope 3 emissions related to Category 1, Category 11 and Category 12	Quantitative	7.0%	25%	8.9%

4.5   ENERGY MANAGEMENT

E1-5 – Energy consumption and mix

We are committed to improve our energy utilisation, as evidenced by the data across our regions. In LATAM, we have achieved a significant reliance on renewable energy with 67% of its total energy consumption derived from renewable sources. This is primarily through the purchase of renewable electricity at our fulfilment centre in Brazil. Our operation in ANZ continues to lead by example with an impressive 97% of its energy consumption coming from renewable sources, which includes 2,429 MWh from on-site solar generation. We are striving to further improve renewable energy utilisation by the Group Shared Functions locations and SEA region. Overall, GFG's is on a balanced energy mix, with 50% of total energy consumption sourced from renewable sources. This balance reflects GFG's commitment to reducing reliance to fossil fuels and transition to more sustainable energy sources.

Table 12: GFG Energy Consumption and Mix 2024

Energy Consumption and Mix	Unit	Group	LATAM	ANZ	SEA	Shared Functions
Fuel consumption from coal and coal products	MWh	-	-	-	-	-
Fuel consumption from crude oil and petroleum products	MWh	349	52	-	297	-
Fuel consumption from natural gas	MWh	75	-	75	-	-
Fuel consumption from other fossil sources		-	-	-	-	-
Consumption of purchased or acquired electricity, heat, steam and cooling from fossil sources	MWh	3,907	893	-	3,006	8.0
Total fossil energy consumption	MWh	4,331	945	75	3,303	8.0
Share of fossil sources in total energy consumption	*Percentage*	*50%*	*33%*	*3%*	*100%*	*100%*
Consumption from nuclear sources	MWh	-	-	-	-	-
Share of consumption from nuclear sources in total energy consumption	*Percentage*	-	-	-	-	-
Fuel consumption from renewable sources, including biomass	MWh	-	-	-	-	-
Consumption of purchased or acquired electricity, heat, steam and cooling from renewable sources	MWh	4,160	1,943	2,217	-	-
Consumption of self-generated non-fuel renewable energy	MWh	212	-	212	-	-
Total renewable energy consumption	MWh	4,372	1,943	2,429	-	-
Share of renewable sources in total energy consumption	*Percentage*	*50%*	*67%*	*97%*	*0%*	*0%*
Total energy consumption	**MWh**	**8,703**	**2,888**	**2,504**	**3,303**	**8.0**

Table 13: GFG Energy Intensity 2024

Total Energy Intensity by NMV	MWh per million NMV	MWh per million Revenue
Group	7.6	11.7
ANZ	4.9	7.0
SEA	12.1	19.1
LATAM	8.1	13.3

4.6 GREENHOUSE GAS EMISSIONS ("GHG")

E1-6 – Gross Scopes 1, 2, 3 and Total GHG emissions

The data below provides a summary of GFG's GHG emissions data from 2019 to 2024, segmented into Scope 1, Scope 2 emissions and Scope 3 emissions.

Table 14: GHG Emissions Data

	Unit	2019 (base year)	2020	2021	2022	2023	2024	% Change vs. 2023
Scope 1 GHG emissions								
Scope 1 gross total	tCO$_2$e	140	74	91	168	218	217	(0.6)%
ANZ	tCO$_2$e	46	46	49	38	33	32	(4.7)%
SEA	tCO$_2$e	18	0.009	6.7	15	33	70	+52%
LATAM[6]	tCO$_2$e	76	28	35	115	152	114	(33)%
Shared functions	tCO$_2$e	0.6	0.6	0.6	0.6	0.7	1.5	+53%
% of Scope 1 GHG emissions from regulated emission trading schemes	Percentage	-	-	-	-	-	-	-
Scope 2 GHG emissions								
Scope 2 (location-based)	tCO$_2$e	4,243	4,253	5,203	5,625	5,043	4,127	(22)%
ANZ	tCO$_2$e	1,632	1,529	1,709	1,515	1,504	1,449	(3.8)%
SEA	tCO$_2$e	1,800	1,957	2,300	2,323	2,357	2,173	(8.5)%
LATAM[6]	tCO$_2$e	782	759	1,145	1,763	1,172	497	(136)%
Shared functions	tCO$_2$e	29	7.9	49	24	9.8	7.6	(29)%
Scope 2 (market-based)	tCO$_2$e	4,243	130	190	-	2,857	2,678	(6.7)%
ANZ	tCO$_2$e	1,632	-	-	-	-	-	-
SEA	tCO$_2$e	1,800	23	51	-	2,357	2,173	(8.5)%
LATAM[6]	tCO$_2$e	782	99	91	-	490	497	+1.5%
Shared functions	tCO$_2$e	29	8.0	48	-	9.8	7.6	(29)%
Scope 3 GHG emissions								
Scope 3 gross total	tCO$_2$e	431,500	516,219	549,613	446,492	295,126	257,454	(15)%
Category 1: Purchased goods & services	tCO$_2$e	319,116	362,596	390,020	305,622	198,104	179,622	(10)%
Footwear	tCO$_2$e	109,135	106,030	103,028	75,456	37,486	34,484	(8.7)%
Apparel	tCO$_2$e	112,737	124,132	170,671	131,528	87,808	75,248	(17)%
Accessories	tCO$_2$e	49,963	49,766	51,650	41,131	22,197	31,435	+29%
Packaging	tCO$_2$e	6,442	600	3,622	5,043	2,435	4,661	+48%
Others	tCO$_2$e	40,839	82,068	61,049	52,464	48,178	33,794	(43)%
Category 2: Capital goods[7]	tCO$_2$e	-	1,275	809	-	921	1,239	+26%

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[6] Data from Argentina operations are retained for GHG emissions accounting to ensure confidence in tracking emissions through time.
[7] Data for Capital Goods for 2019 and 2022 are included in Category 1.

	Unit	2019 (base year)	2020	2021	2022	2023	2024	% Change vs. 2023
Category 3: Fuel and energy-related activities	tCO_2e	317	319	412	500	420	269	(56)%
Category 4: Upstream transportation and distribution	tCO_2e	15,459	11,930	9,717	8,433	5,215	5,049	(3.0)%
Category 5: Waste generated in operations	tCO_2e	684	1,083	69	899	906	596	(52)%
Category 6: Business travel	tCO_2e	2,020	485	62	792	1,114	1,061	(5.0)%
Category 7: Employee commuting	tCO_2e	2,713	1,688	1,788	2,123	3,051	1,729	(76)%
Category 8: Upstream leased assets		n/a	n/a	n/a	n/a	n/a	n/a	n/a
Category 9: Downstream transportation and distribution	tCO_2e	8,335	11,673	11,107	21,075	17,419	13,092	(33)%
Category 10: Processing of sold products	tCO_2e	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Category 11: Use of sold products	tCO_2e	60,981	100,154	111,518	65,645	43,535	38,927	(12)%
Category 12: End-of-life treatment of sold products	tCO_2e	21,875	25,016	24,111	41,403	24,441	15,870	(54)%
Category 13: Downstream leased assets	tCO_2e	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Category 14: Franchises	tCO_2e	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Category 15: Investments	tCO_2e	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Total GHG emissions								
Total GHG emissions (location-based)	tCO_2e	435,883	520,546	554,907	452,285	300,387	261,798	(15)%
Total GHG emissions (market-based)	tCO_2e	435,883	516,423	549,894	446,660	298,201	260,349	(15)%

Table 15: GHG Emissions Intensity

	Unit	Year						% Change vs. 2023
		2019	2020	2021	2022	2023	2024	
GHG emissions intensity (tonnes CO_2 equivalent per million Net Merchandise Value)								
Total emissions intensity	tCO_2e/ mill. NMV	370	406	360	277	233	228	(2.2)%
Scope 1 + 2 emissions intensity	tCO_2e/ mill. NMV	3.7	0.2	0.2	0.1	2.4	2.5	+5.2%
Scope 3 emissions intensity	tCO_2e/ mill. NMV	366	406	360	277	231	225	(2.3)%
GHG emissions intensity (tonnes CO_2 equivalent per million Revenue)								
Total emissions intensity	tCO_2e/ mill. Revenue	483	569	531	711	356	350	(1.3)%
Scope 1 + 2 emissions intensity	tCO_2e/ mill. Revenue	4.9	0.2	0.3	0.3	3.7	3.9	+6.1%
Scope 3 emissions intensity	tCO_2e/ mill. Revenue	478	569	531	711	351	346	(1.4)%

GHG Accounting Policy

Definition & Standards

GFG comprehensively accounts for all GHG emissions, reporting them as gross carbon emissions in tonnes of CO_2 equivalent (tCO_2e). Our emissions accounting adheres to the highest standards, utilising the Corporate Accounting and Reporting Standard, the GHG Protocol Scope 2 Guidance, the Corporate Value Chain (Scope 3) Accounting and Reporting Standard and the GHG Protocol: Technical Guidance for Calculating Scope 3 Emissions. These standards are developed under the auspices of the World Resources Institute and the World Business Council for Sustainable Development. In line with the GHG Protocol Scope 2 Guidance, we provide both location-based and market-based emissions data to ensure transparency and accuracy in our reporting. This dual approach allows us to capture the full impact of our energy consumption and procurement choices.

Reporting Boundaries

At GFG, we utilise the financial control approach to delineate the boundaries for our GHG emissions reporting, following the guidelines of the GHG Protocol. This approach is particularly apt for our role as a holding company, as it entails accounting for 100% of emissions from operations under our financial control, where we can influence financial and operational policies to garner economic benefits. This method ensures that our emissions reporting aligns seamlessly with our financial reporting practices, maintaining consistency across our disclosures. By adopting the financial control approach, we can accurately define which subsidiaries and operations are included in our emissions inventory, offering a comprehensive view that corresponds with our financial statements. This approach underscores our commitment to transparency and accountability, providing stakeholders with a clear understanding of our environmental impact. It also enables us to establish meaningful emissions reduction targets and monitor progress effectively, thereby reinforcing trust and advancing our planet positive agenda.

Aligned Reporting Practices

Unravel Carbon's emissions calculation methodology has been certified by Tüv Rheinland to be in accordance with the Greenhouse Gas ("GHG") Protocol Corporate Carbon Footprint standard. Tüv Rheinland confirmed that the platform is "scientifically based and reflects the state of the art". GFG will consider a recalculation of its emissions and targets, to reflect significant changes that could compromise relevance and consistency of the GHG emissions accounting and target setting of which includes:

- Scope 3 emissions become 40% or more of aggregated scope 1, 2 and 3 emissions.
- Emissions of exclusions in the inventory or target boundary change significantly.
- Significant changes in company structure and activities (e.g., acquisition, divestiture, merger, insourcing or outsourcing, shifts in goods or service offerings).
- Significant adjustments to the base year inventory, data sources or calculation methodologies, or changes in data to set targets such as growth projections (e.g., discovery of significant errors or a number of cumulative errors that are collectively significant).
- Other significant changes to projections / assumptions used in setting the science-based targets.

5. ESRS E5 – CIRCULAR ECONOMY & RESOURCE USE

5.1 OUR IMPACTS AND CIRCULARITY

ESRS 2 IRO-1 – Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities

Depletion of natural resource poses a significant global challenge to people, the planet and businesses. We acknowledge the urgent need to minimise our resource utilisation to preserve natural ecosystems and enable their regeneration within their boundaries.

Impacts

Our operations and the products we distribute significantly shape our sustainability impact. As a retailer, we bridge the gap between brands and customers, with a unique opportunity to influence consumption patterns and the post-purchase journey. While the design of third-party products is largely determined before we engage, we are committed to driving meaningful change within our sphere of influence.

We classify product lifecycles into:

- Direct operations (our own processes of products and waste as well as packaging)
- Indirect operations (the products we distribute from third party brands and the after-use phase of these products.

This structured approach helps us measure, manage, and amplify our positive impacts and is measured through targets to enhance progress within our 'Circularity and Conscious Consumption' strategic pillar.

5.2 CIRCULAR ECONOMY IMPACTS, OPPORTUNITIES AND RISKS

In the short to medium term, our focus is on gathering data and implementing measures within our own operations. This will allow us to enhance our understanding and improve our processes. In the long term, there is an opportunity within indirect operations to emphasise circularity at the end-of-life stage, such as design principles from third-party brands to further support product circularity - however for indirect operations the dependency lies on external stakeholders.

To adopt a more holistic view on circularity in the future, it is essential to consider not only the impact of raw materials but also the afterlife journey of products, as far as this can be assessed. For example, in the context of packaging, transitioning to recycled materials has already brought significant progress for the Group. However, particularly with plastics, a more comprehensive approach is needed that emphasises the end-of-life stage of packaging. It is also crucial to reduce and minimise overall plastic use, given the persistent challenge of plastic pollution. The products created and produced by the Group should be designed with circularity in mind, ensuring that they contribute to a sustainable lifecycle.

Transitioning to a circular economy offers opportunities for sustainable growth and innovation. By adopting circular practices, businesses can reduce GHG emissions and mitigate climate change impacts, such as degraded soil health, droughts, and floods.

However, risks exist if this transition is not made. Continued reliance on conventional methods may increase emissions and exacerbate climate impacts, leading to material scarcity and higher raw material costs. This scarcity could raise the prices of finished goods, affecting consumers and businesses, besides the already mentioned environmental impacts.

Our impacts to nature and climate are predominantly indirect, based on our position as an ecommerce retailer. GHG emissions from brands and suppliers are reflected in our Scope 3 disclosure in this report. All emissions reported therein are not from primary data. We hope, through collaborations with brands and suppliers, we will be able to source more primary data that would a more accurate emissions impact of our value chain. In tandem, we will also approach all other environmental measures, like pollution, waste, chemical use, biodiversity impact and more with our value chain partners. While upstream and downstream operations are largely outside our direct control, we aim to influence consumer behaviour through education and transparency. By highlighting preferred materials and production processes, we empower customers to make informed choices. Additionally, we engage consumers in take-back programmes to encourage recycling and extend product lifecycles, fostering a shared commitment to sustainability.

In our own operations, we address material impacts such as packaging, operational, and product waste by leveraging industry best practices and external circularity resources. Our strategies focus on waste minimization, recovery operations, and adopting circular principles for packaging to identify improvement areas and support a more sustainable and circular model.

In the fragmented fashion industry, we are committed to advancing a circular economy. We actively collaborate with brand partners, aligning on shared goals and leveraging regional strengths. To drive progress, we engage with industry stakeholders and gather insights through workshops, consultations, research, external reports, and forums. Our ANZ regional business is a foundational member of Seamless, addressing clothing waste and promoting a circular economy. We are dedicated to fostering collaborations within the retail space across our regions to enhance our impact.

ESRS 2 MDR-P - Policies to manage its material impacts, risks and opportunities related to resource use and circular economy

To effectively manage our material impacts, risks, and opportunities related to resource use and the circular economy, our organization has established several guidelines and frameworks that align with our strategic targets and facilitate their progression. These initiatives are designed to support the transition to more sustainable packaging solutions and reduce overall packaging consumption, as well as to enhance waste management and reduction practices. Our Sustainable Product Guide serves as a comprehensive resource for identifying products with sustainability-related attributes, verified through specific certifications, trademarks, standards, or programmes ("Credentials"). This guide addresses critical issues such as climate change and GHG emissions, soil health and land management, chemical use and toxicity, water use and pollution, and animal welfare. By implementing these guiding documents, we aim to foster a more circular economy, promoting the production and use of better products and contributing to industry-wide improvements in sustainability.

5.3 CIRCULAR ECONOMY & RESOURCE USE ACTIONS

ESRS 2 MDR-A - Actions and resources in relation to resource use and circular economy

Circularity and conscious consumption are vital components of our sustainability strategy. Through continuous evaluation, learning, and participation in industry initiatives, we are actively developing the following areas:

Recycled and Renewable Resources

We are prioritising the use of recycled, renewable, and regenerative materials, and transitioning away from conventional packaging materials in our operations. This approach is key to reducing emissions and enhancing resource utilization. Our initiatives include transitioning to recycled materials, reducing the overall weight of packaging, and innovating packaging functions, such as removing handles, to further decrease consumption. We have conducted trials with alternative materials like glassine, but these have not yet proven functional in our operations due to durability challenges. We remain committed to exploring and implementing effective solutions to improve sustainability in our packaging practices.

Waste in Own Operations

We are committed to improving waste management by minimising environmental impact through the principles of reduce, reuse, and recycle. Our goal is to decrease the mass of waste directed to landfill or incineration over time. In some countries, new vendors have been onboarded to enhance the accuracy of waste reporting, thereby improving waste management and mitigating landfill use.

In 2024, we focused on examining our own operations more closely, including product waste such as faulty goods in our reporting and strategic roadmap. We have initiated audits of recovery processes and are exploring repair services to enhance recovery rates. These actions are part of our broader strategy to optimise waste management in line with the waste hierarchy and circular economy principles.

We recognise the sustainability benefits of circular practices, however developing a comprehensive strategy presents challenges, including a lack of relevant case studies for our markets and consumer mindset. Despite these obstacles, we continue to learn and leverage our strengths within the circular economy by setting and pursuing achievable targets within our own operations.

5.4 CIRCULAR ECONOMY AND RESOURCE USE RELATED TARGETS

ESRS 2 MDR-T - Tracking effectiveness of policies and actions through targets

The three strategic targets related to resource use and circular economy fall under two pillars for the Group.

Target under Climate Action:

- **Assortment:** By promoting the use of recycled and regenerative materials, aiming to reduce the dependency on conventional virgin materials and achieve 25% of the total units of the assortment sold by 2030 to meet sustainable product criteria.

Targets under Circular and Conscious Consumption:

- **Waste:** Aiming to reduce pollution by promoting waste in own operations to be recovered instead of disposing to landfill or incineration by measuring % of waste of our operations diverted from disposal by reuse and recycling streams.
- **Packaging:** To reduce pollution and reduce emissions through eliminating conventional packaging materials, we aim that by 2030 all our product & delivery packaging will be meeting one of more circular principles (Reduce, Reuse, Recycle or use materials circulating in the economy)

Progress on these targets can be found in the 2030 Strategy section of this report.

We currently have frameworks and guidelines in place to progress on our circularity targets and commitments, ensuring alignment with company ambitions and maintaining reporting integrity. We are committed to transparent disclosures and are actively tracking circularity measures more holistically. As a founding member of Seamless, we are working towards making the Australian clothing industry circular by 2030.

However, we recognise the need for further improvement. To strengthen our efforts, we plan to develop comprehensive policies over time. Local regulations and infrastructure, such as recyclability metrics for packaging, influence our actions. Not all countries offer recycling solutions for plastic packaging, so we are exploring renewable materials as alternatives. We also lack a comprehensive metric for packaging reduction, especially with fluctuations in assortment and orders, leading to data capture gaps.

5.5 RESOURCE OUTFLOWS

E5-5 - Resource outflows

Our current methodology for calculating resource outflows focuses on the most significant areas of resource consumption within our own operations. We monitor and report on own operations and activities we actively influence, such as own packaging and waste.

However, there is still room for improvement within our methodologies and we aim to expand our data collection and improve more granularity over time.

Products

2024 is our first year to calculate and report our product waste. We calculate product waste by separating customer faulty items after returns and supplier faulty items identified during quality control. Weight data is obtained from supplying brands, or average weights based on industry standards are used when unavailable from brands. All data is currently calculated manually, with granularity and accuracy varying by country due to differing capacities for manual calculations. While this method helps track resource outflows, we aim to automate and refine data collection to improve accuracy and efficiency over time.

Packaging

We aim to increase the share of packaging adhering to circular principles, such as using recycled or renewable materials. Currently, factors like reusability, recyclability, or durability do not significantly contribute to packaging circularity due to infrastructure challenges in GFG's regions, particularly regarding recyclability. We closely monitor local infrastructure developments and regulations to refine our approach and enhance our circularity agenda and definitions accordingly.

Waste

Detailed breakdown of the types and the proportions of waste composition are not available at this stage, due to the insufficient data provided by waste collectors, so we are unable to declare the % of components found in waste collected, as most collectors in the different regions would need to base it on assumptions.

Within our operations most of the waste generated consists of:

- **Product Waste:** This encompasses unsold inventory, defective products from suppliers and customer returns, primarily consisting of clothing, footwear, and accessories.
- **Packaging Waste:** Generated from shipping products, this includes cardboard boxes, plastic bags, and protective fillers.
- **General Operational Waste:** This includes municipal and organic waste from our offices and warehouses.

There is no hazardous or industrial waste present in our operations.

Our waste includes a variety of materials, such as glass, paper, cardboard, plastic, food, wood, and electronic waste, as well as product waste. As of 2024, we have included product waste in our reporting. While we have not yet achieved the desired level of granularity, we are committed to refining our data throughout 2025 and onwards to better detail the composition of our waste, especially product waste as one of the most recent added waste categories. This year's report currently lacks detailed data on specific materials within product waste, such as textiles, rubber, leather, and other separable types. We aim to enhance our reporting to provide a more comprehensive understanding of the materials present in our waste material.

Waste reports are generated by external vendors at the point of segregation and provided periodically. We have implemented waste segregation at mature facilities and are enhancing these processes in maturing countries.

We collaborate with waste management vendors to obtain detailed reports on waste types and quantities. Waste audits are conducted at chosen facilities to understand accuracy of waste data and waste streams. For product waste our inventory

management systems track unsold inventory, defective items, and customer returns, recording product waste quantities that classify as waste. Depending on the vendor and recovery operations an assumption for waste calculation will be used for weight calculation from unit inputs.

In many cases, assumptions are made about recovery streams, except in countries with specific legislations or reporting requirements, where data is more granular and accurate. This structured approach, integrating vendor collaboration, waste audits, inventory tracking, and regulatory considerations, ensures that our waste data accuracy can improve over time and remains comprehensive and creating more and more alignment towards reporting requirements.

Table 16: GFG Waste Data 2024

Waste Stream	Units	GROUP	LATAM	ANZ	SEA
Total waste generated	Tonnes	2,102	670	1,020	412
Total non-hazardous waste	Tonnes	2,084	652	1,020	412
Total non-hazardous waste diverted from disposal	Tonnes	1,570	554	667	349
Preparation of reuse	Tonnes	84	24	36	24
Recycling	Tonnes	1,474	520	630	324
Other recovery operations	Tonnes	12	10	0.6	1.0
Total non-hazardous waste directed to disposal	Tonnes	514	98	353	63
Incineration with energy recovery	Tonnes	336	58	270	8.4
Incineration without energy recovery	Tonnes	1.0	1.0	-	-
Landfilling	Tonnes	177	39	83	55
Total non-recycled waste	Tonnes	575	135	352	88
Total hazardous waste	Tonnes	19	18	0.62	-
Total hazardous waste diverted from disposal	Tonnes	0.62	-	0.62	-
Preparation of reuse	Tonnes	-	-	-	-
Recycling	Tonnes	0.62	-	0.62	-
Other recovery operations	Tonnes	-	-	-	-
Non-recycled waste	Percentage	27%	20%	35%	21%
Waste diverted from disposal through recovery operations	Percentage	75%	83%	65%	85%
Waste diverted from landfill	Percentage	91%	91%	92%	87%

Other Circularity & Conscious Consumption Targets

Action	Target	Objective	Target Ambition	2025 Target	2030 Target	2024 Progress
Responsible waste management	% of waste of our operations diverted from disposal by reuse or recycling streams	Our goal is to reduce landfill and incineration of waste by increasing reuse and recycling. This will improve waste management and support circular economy practices, enhancing sustainability and reducing environmental impact.	Quantitative	92%	94%	75%
Sustainable packaging	By 2030 all of our product & delivery packaging will be meeting one or more circular principles. (Reduce, Reuse, Recycle or use materials circulating in the economy)	This target seeks to minimise environmental impact and promote sustainable resource use by reducing packaging, replacing virgin materials, and adopting circular principles such as reducing and enhance recyclability.	Quantitative	89%	100%	78%
Customer engagement & circularity solution	Establish at least one recovery programme collaboration in each country by 2030 to support a circular economy	This target aims to reduce product waste sent to landfill, optimise resource use, and educate customers on circularity, thereby enhancing sustainability and promoting efficient waste management practices.	Quantitative	8.0	13.0	6.0

6. ESRS S1 –
OWN WORKFORCE

6.1 OUR OWN WORKFORCE APPROACH & STRATEGY

At GFG, we prioritise our people by fostering a diverse and inclusive environment that empowers 'true self-expression.' With a team of 3,558 people, we emphasise diversity in backgrounds and ideas to enhance local expertise and global success. We are committed to providing a safe, healthy workplace and ensuring decent conditions for all employees, including our agency employed people. We support growth through regular feedback, learning opportunities, and open communication. Our goal is to become the leading online fashion and lifestyle destination in our markets, leveraging our diverse workforce while maintaining a People and Planet Positive approach.

6.2 WORKING CONDITIONS AND WORK-RELATED RIGHTS

ESRS 2 SBM-3 - Material impacts risks and opportunities and their interaction with strategy and business model

GFG is committed to ensuring our people feel valued for the work they do. This means providing supportive working conditions for all our people including competitive compensation packages, flexible working for employees, and secure employment. Our materiality assessment identified the following potential impact on our workforce:

Employment Practices and Worker Rights

Our Employment Practices are centred on fostering equal treatment and opportunities for all adhering to and upholding local employment laws and regulations, with a focus on gender equality, diversity, and equal pay for work of equal value. Key areas include providing training and skills development to ensure our people can progress their careers along with supporting a balance through Mental Health & Wellbeing and Hybrid Work policies.

We focus on inclusion by actively employing and including persons with disabilities, ensuring they have equal opportunities. We maintain fair wages, uphold safe working conditions, and provide essential healthcare to sustain our workforce. We prioritise employee engagement, diversity, and inclusion fostering a culture where our people can express their true selves. We also proactively ensure we do not engage in forced labour and respect employees' privacy to manage risks and uphold ethical standards. Through these efforts, we create a more sustainable, inclusive, and equitable work environment, driving our long-term success.

S1-1 Policies Related to Own Workforce

GFG's Business Conduct & Ethics Code, revised in March 2023, sets the ethical standards for all employees, directors, and contractors globally. It emphasises integrity, respect, and legal compliance, covering anti-bribery, anti-corruption, data privacy, fair competition, and responsible asset use. Employees must avoid conflicts of interest, maintain accurate financial records, and support diversity, inclusion, and sustainability. The Code enforces a zero-tolerance policy on bribery and corruption and mandates compliance with securities laws to prevent insider trading. It includes strict data privacy guidelines and promotes open communication through the Speak Up! protocol, allowing employees to report concerns without fear of retaliation. The Code underscores GFG's commitment to a safe, inclusive workplace and community contribution, reflecting its dedication to ethical practices, transparency, and accountability.

GFG provides training on the Business Conduct & Ethics Code. The company conducts regular training led by our Legal, Risk & Compliance teams and refreshers on its policies, including the Business Conduct & Ethics Code, in various formats such as face-to-face sessions, live streams, e-learning videos, virtual engagement, quizzes, and awareness campaigns. All reference materials are available on the company's intranets 1. Additionally, the Business Conduct & Ethics Code is included in the employee onboarding process and is always accessible on the company's relevant intranet.

S1-2 Processes for engaging with own workforce and workers' representatives about impacts

We measure our progress by monitoring outcomes of our regular pulse and deep dive engagement surveys which we conduct in each region. Our 2024 final employee engagement survey result was 76% (compared to FY2023 of 73%) agreed or strongly agreed that they would recommend GFG as a great place to work. Additionally, the survey revealed a continued positive trend on our Diversity & Inclusion questions with 79% agreeing or strongly agreeing "I can be my authentic self at work". This is a result of our commitment to an inclusive workplace championed by our Management Board, Executive team, and Senior Leaders.

Further where there are impacts that relate to our own workforce the regional teams have established forums to engage employees and/or their representatives including health & safety committees, regular meetings and reviews with local unions (specifically in LATAM) and employee engagement action groups to directly provide input to our initiatives.

Our Group Chief People & Sustainability Officer along with our regional People & Culture Directors are responsible for ensuring these surveys are conducted, shared and acted upon across the Group. In 2025 we will continue to conduct regular surveys (minimum 2 per year) of all our employees to act on opportunities to further improve.

S1-3 Processes to remediate negative impacts and channels for own workforce to raise concerns

All our people are encouraged to report any concerns or complaints regarding harassment, alleged legal or financial impropriety or other concerns with their manager, with People & Culture or through our independent whistleblowing mechanism, which is described in detail in G1-1, Business Conduct and Corporate Culture.

6.3 OUR OWN WORKFORCE PROGRESS IN 2024

S1-4 Taking action on material impacts on own workforce, and approaches to managing risks and pursuing opportunities related to own workforce, and effectiveness of those actions

During 2024, we continued to ensure our own workforce and those of our 3rd Party Labour Providers were offered equal treatment with fair wages and employment conditions adhering to local employment law and regulations. Our strategic priorities focus on the foundations of building a diverse and inclusive workplace where all employees can express their true selves and being a Responsible workplace and where leaders prioritise the health, safety and wellbeing of all our people and a culture where safety is everyone's business. In 2024, we continued a strong track record of no fatalities resulting from accidents in our workplace and 75% of surveyed employees agreeing that "wellbeing is a priority at GFG" We actively engage our own workforce in regular engagement surveys to ensure we are actively address opportunities to improve open communication about the company strategy, financial goals and initiatives including those they may impact our own workforce. The GFG Executive team meet quarterly with all senior leaders globally to share and discuss relevant topics and ensure alignment on our strategic priorities. Further we also ensure that own workforce risks are identified and managed via our Global Risk and Governance Committee with clear action plans for mitigation. As outlined in S1-17 we encourage our employees to Speak Up through our hotline to ensure our commitment to our People Dignity & Respect policy is upheld.

6.4 OWN WORKFORCE TARGETS

S1-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

The effectiveness of our programmes and policies is measured through two of our Strategic Pillars & targets; Responsible Workplace and Diversity, Inclusion and Belonging along with measuring our overall effectiveness in building a positive corporate culture measured through our Employee Engagement Surveys reported in S1-2.

Targets under Responsible Workplace

- Leadership & Accountability – aims for all senior leaders to complete quarterly safety walks & talks in all key operations

- Engagement & Education – aims to ensure our employees agree that through our action's wellbeing is a priority

- Good Governance – aims to overall ensure that we have a workplace free from harm with no permanent injuries or fatalities

Targets under Diversity, Inclusion & Belonging

- Strive for gender equality – aims to ensure a balanced representation of women in all part of the business with equal access to opportunities including equal representation on our Management Board.

- Empower true self-expression – aims to ensure our people feel respected at work and feel a sense of belonging

Progress on these targets can be found in the 2030 Strategy section of this report.

S1-6 Characteristics of GFG's employees

Table 17: Employee Headcount by Gender and Region

Gender	Group	LATAM	SEA	ANZ	Total	%
Female	53	661	726	697	2,137	60.1%
Male	104	474	513	330	1,421	39.9%
Total	**157**	**1,135**	**1,239**	**1,027**	**3,558**	**100.0%**

Table 18: Employee Headcount by Region (1 January to 31 December 2024)

Region	Average Headcount	YE Headcount
Group	158	157
LATAM	1,328	1,135
SEA	1,367	1,239
ANZ	1,069	1,027
Total	**3,922**	**3,558**

Table 19: Employee Headcount in Countries with >50 Employees (1 January to 31 December 2024)

Country	Average Headcount	YE Headcount
Australia	910	874
Brazil	966	820
Chile	143	104
Colombia	219	211
Indonesia	257	230
Malaysia	655	593
Philippines	371	350
Singapore	138	121
Vietnam	143	148
All others	120	107
Total	**3,922**	**3,558**

Table 20: Employee Headcount by Employment Type and Broken Down by Gender

Employment Type	Female	Male	Total
Permanent	1,960	1,298	3,258
Fixed term	34	16	50
Interns/trainees	72	42	114
Casual workers	71	65	136
Total	**2,137**	**1,421**	**3,558**

Table 21: Employee Headcount by Employment Type and Broken Down by Region

Employment Type	Group	LATAM	SEA	ANZ	Total
Total headcount	157	1,135	1,239	1,027	3,558
Permanent	142	1,080	1,159	877	3,258
Fixed term	14	2	20	14	50
Interns/trainees	1	53	60	0	114
Casual workers	0	0	0	136	136

Definitions of employment type

- Permanent employees - Employees who are on company payroll and do not have a pre-determined end date in their employment contract.
- Fixed-term employees - Employees who are on company payroll with a pre-determined end date in their employment contract.
- Interns/ Trainees - Interns/ trainees who are on company payroll as part of ongoing studies.
- Casual workers - Employees who are on company payroll but do not fall into any of the above categories e.g. hourly paid employees, etc.

The headcount data is consolidated across 4 regions and 15 countries where employees are engaged across Latin America, Southeast Asia, Australia and New Zealand, and Europe. Of the 15 countries, 9 have 50 or more employees on company payroll. Headcount is formulated as an employee on company payroll active as at the reporting date of December 31, 2024. Average headcount is calculated by consolidating the total headcount on the last day of each month and dividing the total by the number of months in a year (12).

At the end of FY2024, GFG had 3,558 employees, with an average of 3,922 employees throughout the year, as reported in the GFG FY2024 Annual Report. When considering the different types of employment relationships within Global Fashion Group, we have presented 4 categories -permanent employees, fixed-term employees, interns / trainees, and casual workers (hourly) 91.6% of the total workforce are permanent employees while the remainder are temporary or non-guaranteed hours employees.

Turnover refers to all leavers, voluntary and involuntary, and is calculated by dividing the total number of leavers in permanent positions during the period by the average monthly headcount. The FY2024 employee turnover rate is 39.3%, with a total of 1,410 employees having left across the entire business. As compared to FY2023, this number has decreased by approximately 3.7 percentage points.

S1-8 Collective bargaining coverage and social dialogue

At GFG, 24.8% of our employees are part of a collective bargaining agreement, of which all are in the LATAM region, outside the European Economic Area ("EEA"), with 100% of employees covered in Brazil and 60% in Chile. No employees located in the EEA are covered by such agreements.

S1-9 Diversity metrics

Table 22: Gender Distribution of Top Management

Gender	Headcount	%
Female	11	37.9%
Male	18	62.1%
Total	**29**	**100.0%**

Table 23: Employee Distribution by Age Group

Age Range	Headcount	%
< 30 years	1,464	41.1%
Between 30 and 50 years	1,957	55.0%
> 50 years	137	3.9%
Total	**3,558**	**100.0%**

In this section, we present the gender and age metrics of our employees across all entities.

Our top management level includes Management Board and Group Shared Function Executives, the Regional CEOs of each entity and their direct reports who hold functional accountability. Some examples of these function heads include the Chief Finance Officer, Chief Commercial Officer, and Chief Technology Officer. Considering the headcount i.e.in active employment as of 31 December 2024, our Executive Management team consists of 29 employees, out of which 37.9% female.

Distribution of employees by age group is calculated using the employees' age as of 31 December 2024 and determining where they fall within the relevant bands i.e.< 30 years. Overall, most of our workforce is below 50 years old with 41.1% below 30 years old, reflective of the nature of our business, industry sector and markets in which we operate.

S1-10 Adequate Wages

All our employees in European countries are paid an adequate wage in line with Directive (EU) 2022/2041, and 100% of our employees in non-European countries are paid an adequate wage in line with applicable national benchmarks or at least the local minimum wages as set by the relevant government body. We incorporate national benchmarks when determining wages for all employees, to ensure they receive an adequate wage.

S1-14 Health and safety metrics

GFG is committed to fostering a responsible workplace by empowering local action through our Group Responsible Workplace Framework & Commitment that covers all employees. This structure allows each operation to tailor its approach based on specific local risks and priorities. The framework is assessed each year for inclusion in internal audit procedures as part of the regular enterprise risk review process. To enhance awareness and accountability, senior leaders conduct regular structured Health & Safety ("H&S") leadership walks across all operational sites, following Group-wide guidelines. Frontline employees, especially delivery staff, participated in direct training with regular refreshers. Senior leaders attended continuous awareness sessions on topics like psychosocial risks.

GFG recorded 151 workplace incidents in 2024, with 78% classified as first aid cases and fewer than 2% requiring assistance in a hospital. GFG did not have any workplace fatalities in 2024 nor any reportable incidents. Additionally, 85 near misses were proactively identified and resolved. All GFG guidelines apply to any third-party workers that visit our facilities.

GFG upholds ethical labour standards across its supply chain, particularly for individuals employed through workforce labour service providers. Our Framework for the Management of Labour Service Providers mandates comprehensive due diligence, including annual risk assessments of all providers across key service areas like warehouse labour, last-mile delivery, security, maintenance and cleaning. In 2024, we assessed 108 providers globally. Where required these providers underwent on-site audits, and corrective action plans were implemented.

S1-16 Remuneration metrics (pay gap and total remuneration)

To calculate gender pay gap in GFG, we have included permanent and fixed-term employees from countries where the workforce exceeded 50 employees as at 31 December 2024, thereby providing a robust sample size. The compensation data utilised in this calculation is the annual basic salary, which serves as a reliable indicator of regular earnings. To determine the average hourly pay, we divide the annual basic salary by 52 weeks and then by the contractual working hours per week, providing a consistent basis for comparing earnings across genders.

The gender pay gap in FY2024 has been calculated to be 8.9% in GFG.

It is important to clarify that gender pay gap is not synonymous with equal pay; it does not indicate that females are paid 8.9% less than males for the same roles. Instead, the gender pay gap reflects broader disparities in average earnings across the organisation. One factor influencing this gap is the distribution of employees across different employment levels. 60% of the GFG workforce is female, employed across all aspects of the business. However, representation in Technology skilled positions is approximately 70% male and these positions are generally higher paid skilled positions. GFG is continuously working to increase representation of women in our Technology positions and other professions in our business. The total remuneration ratio calculation represents the median annual total remuneration of our permanent and fixed-term employees against our top paid individual. The calculation uses Total Direct Compensation (TDC) comprising annual basic salary on-target short-term incentive payout amount. Importantly, we have excluded other variable compensation components as this varies by country. The top paid individual in this context is the CEO of GFG, whose remuneration details are disclosed in our FY2024 Annual Remuneration Report (section 3.5). The remuneration ratio is then calculated by dividing the TDC of the top paid individual by the median TDC of all included employees.

The total annual remuneration ratio is 76.6 in GFG. It is essential to consider that since our data encompasses employees from a wide range of employing countries, each with its unique employment legislation, minimum wages and cost of living, we have not adjusted the compensation data to account for these differences in purchasing power, meaning our total remuneration ratio presents the unaltered figures. At GFG, we are committed to fair and competitive compensation that is vital to attracting and retaining our people. To uphold this commitment, we regularly conduct benchmarking exercises and annual wage reviews, ensuring that all our employees receive equitable and competitive remuneration.

All compensation figures are standardised by directly converting local currencies to Euros, using the foreign exchange rates provided by GFG Finance at the end of the Financial Year 2024, ensuring comparability across different regions.

S1-17 Incidents, complaints and severe human rights impacts

In 2024, a total of 62 Speak UP! cases were reported via our independent whistleblower programme. Of these cases, 16 reports were substantiated, with 15 cases leading to disciplinary actions or remediation plans. Out of the substantiated cases, 0 related to discrimination and 7 related to bullying and harassment. There were no cases of severe human rights incidents (e.g., forced labour, human trafficking, or child labour) reported or identified during 2024.

Additional Information S1

For reporting year 2024 we have decided to utilise the phasing provisions and phase the sections S1-7, 11, 12, 13, 14 & 15

Table 24: S1 Accounting Policy Summary

ESRS DR	Paragraph	DP/Metric	Policy
S1-6	50a	Total number of employees	Employee data is recognised based on records from the Group's HR systems. The total number of employees is expressed on a headcount basis, and the number of full-time / part-time / permanent / temporary employees are expressed on a headcount basis. The data represents status at year end (31/12/2024).
S1-6	50c	Number and rate of employee turnover	The employee turnover rate is calculated as the number of employees who have left the company within the reporting year divided by the total number of employees in/on average in the year on a headcount basis.
S1-6	52a	Full-time employee	A full-time employee is an employee whose working hours per week, month, or year are defined according to national legislation and practice regarding working time in each country GFG operates in.
S1-6	52b	Part-time employee	A part-time employee is an employee whose working hours per week, month, or year are less than 'full-time' as defined above.
S1-9	66a	Women in top management	Proportion of individuals in top management who are women. Top management is defined as one level below the GFG Management Board on Group level and two levels below the GFG Management Board for its regions.
S1-9	66b	Age distribution	Includes all employees (full-time and part-time employees), and data is given on a headcount basis.
S1-9		Diversity	Outline in the People Dignity & Respect Policy
S-10	68	Adequate wages	The disclosure whether employees are paid an adequate wage is determined using the lowest wage for the lowest job category. The lowest wage has been considered separately for each country GFG operates in.
S-17	103a	Incidents of discrimination, including harassment	Outlined in the Grievance Policy & Speak Up, And Non-Retaliation Policy
S-17	103b	Number of complaints	Outlined in the Speak Up! And Non-Retaliation Policy
S-17	104a	Severe human rights incidents	

7. ESRS G1 – GOVERNANCE DISCLOSURE

7.1   OWN BUSINESS CONDUCT

At GFG, we are committed to conducting business with integrity across all aspects of our operations and to complying with the laws and regulations in every country where we operate. The fashion and lifestyle sector involves interactions with various stakeholders, making it essential to uphold ethical business practices, especially in regions with higher risks. As a leading fashion and lifestyle destination in LATAM, SEA, and ANZ, we continually enhance our compliance programme. We focus on building and maintaining a common understanding of our business conduct expectations with our employees, suppliers, and other third parties.

7.2   GOVERNANCE IMPACTS, RISKS & OPPORTUNITIES

G1 Material impacts risks and opportunities and their interaction with strategy and business model

Our materiality assessment has identified "Corporate Culture" and "Compliance with regulations" as two critical pillars of our governance strategy. These aspects are integral to ensuring long-term business sustainability, ethical practices, and compliance with evolving regulations across all jurisdictions where we operate.

Corporate Culture

Our materiality assessment highlights corporate culture as a key enabler of sustainability and governance. Corporate culture defines the ethical framework within which our employees and leadership operate, fostering a shared commitment to integrity, transparency, and accountability. A strong corporate culture ensures alignment across all organisational levels, promoting ethical decision-making and mitigating risks such as corruption, bribery, and misconduct.

Compliance with Regulation

The materiality assessment has also underscored the importance of compliance with regulation as a key governance priority. Operating in diverse regions exposes us to various regulatory landscapes, particularly concerning anti-corruption, human rights, and labour standards. The assessment reveals that non-compliance could result in significant reputational damage, financial penalties, and disruption to our operations.

G1-1 Business conduct policies and corporate culture

GFG's Supervisory Board, Management Board and C-Level Executives set and reinforce the culture of compliance across the Company through their words and behaviour. The Company's robust Code of Business Conduct & Ethics (the "Code") outlines clear expectations and provides practical guidance on the standard of behaviour expected from all employees. The Code of Conduct establishes our commitments to Diversity, Inclusion & Belonging, Responsible Workplace, No Bullying, Discrimination & Harassment, a hybrid working environment and protocols for preventing potential conflicts of interest. Employees are expected to adhere to these standards to maintain a fair and inclusive business environment

As set out in the Code, GFG has a zero-tolerance approach to bribery and corruption, and maintains a suite of policies and procedures for ensuring compliance with anti-bribery and anti-corruption laws in addition to the Code, including the Anti-Bribery and Anti-Corruption Policy, the Gifts and Hospitality Policy, Governance Manual, and Supplier Code of Conduct. GFG operates a zero-tolerance policy towards bribery and corruption. The Company's suite of anti-bribery policies and procedures are designed to accord with the standards set by the United Nations Convention against Corruption.

Training is conducted for all employees when they join Global Fashion Group, ensuring that employees are aware of the Company's high standards of business conduct and ethics.

Global Fashion Group also maintains a Speak Up! and Non-Retaliation Policy ("Speak Up! Policy") and anonymous whistleblowing channel operated by an independent third-party provider. The Speak Up! Policy and whistleblowing channel are designed to empower employees, directors and officers to raise concerns about any behaviour that is not in accordance with our Code or other mandatory policies. Its purpose is to provide employees with an explanation of how to raise concerns in confidence; ensure that employees receive a response to their concerns; and reassure employees that they will be protected from retaliation if they have made a disclosure in good faith. Through the Speak Up! Policy, Global Fashion Group pledges to GFG pledges to support and protect every employee who raises a genuine concern in good faith, and to investigate every report fairly.

In addition to the Speak Up! Policy, Global Fashion Group also has in place an Internal Investigations Policy designed to ensure that all concerns of alleged breach of the Company's standard of business conduct and ethical behaviour, including alleged incidents of bribery or corruption, are investigated fairly, impartially, thoroughly, consistently, and in compliance with applicable laws.

All new employees are required to complete training on all core compliance policies and procedures upon joining the Company.

G1-2 Management of relationships with suppliers

Global Fashion Group is committed to conducting business with intention and integrity to drive success and benefit our stakeholders, globally. All employees are expected to apply the highest standards of ethical corporate behaviour to realise the Company's commitment to doing business responsibly. This commitment is enshrined in the Company's Code of Business Conduct and Ethics (the "Code"). The Code expressly provides that Global Fashion Group and its employees must deal fairly with stakeholders and other market participants, and states that the Company and its employees must not take unfair advantage of such parties through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practices.

In addition, Global Fashion Group has in place a Supplier Code of Practice ("Supplier Code") with which it requires all relevant third-party providers of goods or services to comply. Due diligence is conducted at the beginning of a relationship with a Supplier to ensure that the Supplier can comply with Global Fashion Group's standards. The purpose of the Supplier Code is to ensure ethical labour practices, human rights, and environmental protection in Global Fashion Group's wider supply chain. The Supplier Code emphasises anti-bribery and anti-corruption, and transparency. Suppliers are required to comply with local and international laws, treat workers fairly, avoid forced or child labour, and manage environmental impacts responsibly. Some highlights are:

Pursuant to the Supplier Code, Suppliers are expected to comply with all applicable local and international laws and regulations, including those related to labour standards, environmental protection, and anti-corruption. The Supplier Code emphasises ethical trade and the protection of human rights, and all Suppliers must ensure fair treatment of workers, decent working conditions, and the absence of forced or child labour. In addition, Suppliers are required to minimise their environmental impact by reducing pollution, managing waste responsibly, and promoting sustainable use of resources like energy and water. They must maintain up-to-date environmental permits and provide data on environmental impacts when requested. Suppliers must also adhere to anti-corruption laws and maintain transparency in their operations. They are required to provide accurate information during inspections and in regular business dealings. Suppliers are advised that non-compliance or lack of transparency can lead to termination of the business relationship, and Global Fashion Group reserves the right to inspect supplier facilities to ensure compliance with the Code. Inspections can be unannounced, and suppliers must cooperate fully.

These elements ensure that GFG's supplier relationships are managed responsibly, ethically, and in compliance with relevant standards and regulations.

G1-3 Prevention and detection of corruption and bribery

As set out in the Company's Code of Business Conduct and Ethics (the "Code"), GFG has a zero-tolerance approach to bribery and corruption, and maintains a suite of policies and procedures for ensuring compliance with anti-bribery and anti-corruption laws in addition to the Code, including the Anti-Bribery and Anti-Corruption Policy, the Gifts and Hospitality Policy, and Supplier Code of Conduct.

Training is provided to all employees on the Company's policies relating anti-bribery and anti-corruption, and an independent and confidential whistleblowing hotline is made available to all employees to report any suspected incidents of bribery or corruption.

Any suspected incident of bribery or corruption would be investigated in accordance with the Company's Internal Investigation Policy by Internal Audit and the Legal Team and reported to the Management Board and Supervisory Board.

7.3 GOVERNANCE PROGRESS IN 2024

G1-4 Incidents of corruption and bribery

There were no reported incidents of bribery and corruption concerning Global Fashion Group in 2024.

G1-5 Political influence and lobbying activities

Pursuant to the Company's Code of Business Conduct & Ethics, Global Fashion Group does not support or make donations or other contributions to political parties or candidates or engage in any lobbying activities with government officials or public bodies. In addition, employees of Global Fashion Group are expressly prohibited from supporting or contributing to political parties or candidates on behalf of GFG or as representatives of GFG without the express approval of the Management Board. No such approval was requested or provided in 2024.

No members of the Supervisor Board, Management Board or management team of Global Fashion Group and its entities have held roles in public administration or regulatory bodies in the two years prior to the 2024 reporting period.

Data Protection and Security

Trusted Platform (Security): For GFG, data security is more than just a policy - it is an integral part of our risk management. We adhere to international best practices and national standards across all regions, led by our Chief Information Security Officer and closely monitored by the Audit Committee. We have tailored regional privacy policies to detail how we collect, use and protect user information. Our data collection fuels platform improvements, personalised experiences and targeted advertising within our platforms. Only in specific legal circumstances, such as combating fraud or complying with regulations, may user information be used beyond this scope.

Accounting Policy Summary

Table 25: G1 Accounting Policy Summary

ESRS DR	Paragraph	DP/Metric	Policy
G1-1	10c	Whistle blower protection	Outlined in the Speak Up! And Non-Retaliation Policy
G1-4	24a	Amount of monetary losses	Outlined in the Anti-Bribery and Anti-Corruption Policy
G1-4	25a	Number of confirmed incidents of corruption or bribery	Outlined in the Anti-Bribery and Anti-Corruption Policy
G1-4	25b	Number of confirmed incidents in which own workers were dismissed or disciplined for corruption or bribery-related incidents	Outlined in the Speak Up! And Non-Retaliation Policy
G1-4	25c	Number of confirmed incidents relating to contracts with business partners that were terminated or not renewed due to violations related to corruption or bribery	Outlined in the Supplier Code of Conduct

8. GLOSSARY

8.1 CONTENT INDEX

General Disclosures

Disclosure Requirement ID	List of Material Disclosure Requirements	Paragraph or Page Reference
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BP-2	Disclosures in relation to specific circumstances	15
GOV-1	The role of the administrative, management and supervisory bodies	15
GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	16
GOV-3	Integration of sustainability-related performance in incentive schemes	16
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Environmental Disclosure

ESRS E1: Climate Change

Disclosure Requirement ID	List of Material Disclosure Requirements	Paragraph or Page Reference
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E1.IRO-1	Description of processes to identify and assess material climate-related impacts, risks and opportunities	33
E1.SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	33
E1-1	Transition plan for climate change mitigation	32
E1-2	Policies related to climate change mitigation and adaptation	36
E1-3	Actions and resources in relation to climate change policies	36
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ESRS E5: Resource Use & Circular Economy

Disclosure Requirement ID	List of Material Disclosure Requirements	Paragraph or Page Reference
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E5-3	Tracking effectiveness of policies and actions through targets	44
E5-5	Disclosure on undertaking's resource outflows, including wastes, related to its material impacts, risks and opportunities	44

Social Disclosure

S1 - Own Workforce

Disclosure Requirement ID	List of Material Disclosure Requirements	Paragraph or Page Reference
S1.SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	48
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S1-2	Processes for engaging with own workers and workers' representatives about impacts	48
S1-3	Processes to remediate negative impacts and channels for own workers to raise concerns	49
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Governance Disclosure

G1 – Business Conduct

Disclosure Requirement ID	List of Material Disclosure Requirements	Paragraph or Page Reference
G1.GOV-1	The role of the administrative, supervisory and management bodies	15, AR section 3.2
G1.IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	55
G1-1	Corporate culture and business conduct policies and corporate culture	55
G1-2	Management of relationships with suppliers	56
G1-3	Prevention and detection of corruption and bribery	56
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8.2 LIST OF DATA POINTS THAT DERIVE FROM OTHER EU LEGISLATION

IRO-2 - Disclosure of list of data points that derive from other EU legislation and information on their location in sustainability statement

Disclosure Requirement and Related Datapoint	SDFR Reference	Pillar 3 Reference	Benchmark Regulation Reference	EU Climate Law Reference	Materiality	Page & Paragraph
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	Indicator number 13 of Table #1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816, Annex II		Material	15, AR section 3.2
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)			Delegated Regulation (EU) 2020/1816, Annex II		Material	15, AR section 3.2
ESRS 2 GOV-4 Statement on due diligence paragraph 30	Indicator number 10 Table #3 of Annex 1				Not material	-
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i	Indicators number 4 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk	Delegated Regulation (EU) 2020/1816, Annex II		Not material – GFG is not involved in any fossil fuel activities	-
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii	Indicator number 9 Table #2 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II		Not material – GFG is not involved in any activities related to chemical production	-
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii	Indicator number 14 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Not material – GFG is not involved in activities related to controversial weapons	-
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv			Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Not material – GFG is not involved in activities related to cultivation and production of tobacco	-
ESRS E-1 Transition plan to reach climate neutrality by 2050 paragraph 14				Regulation (EU) 2021/1119, Article 2(1)	Material	32

Disclosure Requirement and Related Datapoint	SDFR Reference	Pillar 3 Reference	Benchmark Regulation Reference	EU Climate Law Reference	Materiality	Page & Paragraph
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)		Article 449a Regulation (EU) No 575/2013: Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book - Climate Change Transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 12.1 (d) to (g), and Article 12.2		Not material	32
ESRS E1-4 GHG emission reduction targets paragraph 34	Indicator number 4 Table #2 of Annex 1	Article 449a Regulation (EU) No 575/2013: Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book - Climate Change Transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 6		Material	36
ESRS E1-4 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	Indicator number 6 Table #1 of Annex 1				Material	39
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	Indicator number 5 Table #1 and Indicator number 5 Table #2 of Annex I				Material	38
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	Indicators number 1 and 2 Table #1 of Annex 1	Article 449a; Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book - Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)		Material	39

Disclosure Requirement and Related Datapoint	SDFR Reference	Pillar 3 Reference	Benchmark Regulation Reference	EU Climate Law Reference	Materiality	Page & Paragraph
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	Indicators number 3 Table #1 of Annex 1	Article 449a Regulation ((EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book - Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 8(1)		Material	40
ESRS E1-7 GHG removals and carbon credits paragraph 56				Regulation (EU) 2021/1119, Article 2(1)	Not material	-
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II		Not material	-
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a)		Article 449a Regulation (EU) No 575/2012; Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 5: Banking book - Climate change physical risks: Exposures subject to physical risk			Not material	-
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy efficiency classes paragraph 67 (c)		Article 449a Regulation (EU) No 575/2013: Commission Implementing Regulation (EU) 2022/2453 paragraph 34; Template 2: Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral			Not material	-
ESRS E1-9 Degree of exposure on the portfolio to climate-related opportunities paragraph 69			Delegated Regulation (EU) 2020/1818, Annex II		Not material	-

Disclosure Requirement and Related Datapoint	SDFR Reference	Pillar 3 Reference	Benchmark Regulation Reference	EU Climate Law Reference	Materiality	Page & Paragraph
ESRS E2-4 Amount of each pollutant listed in Annex II of the EPRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Indicator number 8 Table #1 of Annex 1 Indicator number 2 Table #2 of Annex 1 Indicator number 1 Table #2 of Annex 1 Indicator number 3 Table #2 of Annex 1				Not material	-
ESRS E3-1 Water and marine resources paragraph 9	Indicator number 7 Table #2 of Annex 1				Not material	-
ESRS E3-1 Dedicated policy paragraph 13	Indicator number 8 Table 2 of Annex 1				Not material	-
ESRS E3-1 Sustainable oceans and seas paragraph 14	Indicator number 12 Table #2 of Annex 1				Not material	-
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	Indicator number 6.2 Table #2 of Annex 1				Not material	-
ESRS E3-4 Total water consumption in m3 per net revenue on own operations paragraph 29	Indicator number 6.1 Table #2 of Annex 1				Not material	-
ESRS 2- IRO 1 - E4 paragraph 16 (a) i	Indicator number 7 Table #1 of Annex 1				Not material	-
ESRS 2- IRO 1 - E4 paragraph 16 (b)	Indicator number 10 Table #2 of Annex 1				Not material	-

Disclosure Requirement and Related Datapoint	SDFR Reference	Pillar 3 Reference	Benchmark Regulation Reference	EU Climate Law Reference	Materiality	Page & Paragraph
ESRS 2- IRO 1 - E4 paragraph 16 (c)	Indicator number 14 Table #2 of Annex 1				Not material	-
ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b)	Indicator number 11 Table #2 of Annex 1				Not material	-
ESRS E4-2 Sustainable oceans / seas practices or policies paragraph 24 (c)	Indicator number 12 Table #2 of Annex 1				Not material	-
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	Indicator number 15 Table #2 of Annex 1				Not material	-
ESRS E5-5 Non-recycled waste paragraph 37 (d)	Indicator number 13 Table #2 of Annex 1				Material	45
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	Indicator number 9 Table #1 of Annex 1 I				Not material	-
ESRS 2- SBM3 - S1 Risk of incidents of forced labour paragraph 14 (f)	Indicator number 13 Table #3 of Annex I				Not material	-
ESRS 2- SBM3 - S1 Risk of incidents of child labour paragraph 14 (g)	Indicator number 12 Table #3 of Annex I				Not material	-
ESRS S1-1 Human rights policy commitments paragraph 20	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex				Not material	-
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21			Delegated Regulation (EU) 2020/1816, Annex II		Not material	-
ESRS S1-1 processes and measures for preventing trafficking in human beings paragraph 22	Indicator number 11 Table #3 of Annex I				Not material	-

Disclosure Requirement and Related Datapoint	SDFR Reference	Pillar 3 Reference	Benchmark Regulation Reference	EU Climate Law Reference	Materiality	Page & Paragraph
ESRS S1-1 workplace accident prevention policy or management system paragraph 23	Indicator number 1 Table #3 of Annex I				Material	48
ESRS S1-3 grievance/complaints handling mechanisms paragraph 32 (c)	Indicator number 5 Table #3 of Annex I				Material	49
ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)	Indicator number 2 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		Not material	-
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	Indicator number 3 Table #3 of Annex I				Not material	-
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	Indicator number 12 Table #1 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		Material	52
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	Indicator number 8 Table #3 of Annex I				Material	52
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	Indicator number 7 Table #3 of Annex I				Material	52
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD paragraph 104 (a)	Indicator number 10 Table #1 and Indicator n. 14 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)		Material	52
ESRS 2- SBM-3 – S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	Indicators number 12 and n. 13 Table #3 of Annex I				Not material	-

Disclosure Requirement and Related Datapoint	SDFR Reference	Pillar 3 Reference	Benchmark Regulation Reference	EU Climate Law Reference	Materiality	Page & Paragraph
ESRS S2-1 Human rights policy commitments paragraph 17	Indicator number 9 Table #3 and Indicator n. 11 Table #1 of Annex 1				Not material	-
ESRS S2-1 Policies related to value chain workers paragraph 18	Indicator number 11 and n. 4 Table #3 of Annex 1				Not material	-
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Not material	-
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19			Delegated Regulation (EU) 2020/1816, Annex II		Not material	-
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	Indicator number 14 Table #3 of Annex 1				Not material	-
ESRS S3-1 Human rights policy commitments paragraph 16	Indicator number 9 Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex 1				Not material	-
ESRS S3-1 Non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines paragraph 17	Indicator number 10 Table #1 Annex 1 Delegated Regulation (EU) 2020/1816, Annex II		Delegated Regulation (EU) 2020/1818, Art 12 (1)		Not material	-
ESRS S3-4 Human rights issues and incidents paragraph 36	Indicator number 14 Table #3 of Annex 1				Not material	-
ESRS S4-1 Policies related to consumers and end users paragraph 16	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1				Not material	-

Disclosure Requirement and Related Datapoint	SDFR Reference	Pillar 3 Reference	Benchmark Regulation Reference	EU Climate Law Reference	Materiality	Page & Paragraph
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Not material	-
ESRS S4-4 Human rights issues and incidents paragraph 35	Indicator number 14 Table #3 of Annex 1				Not material	-
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	Indicator number 15 Table #3 of Annex 1				Material	55
ESRS G1-1 Protection of whistle- blowers paragraph 10 (d)	Indicator number 6 Table #3 of Annex 1				Material	56
ESRS G1-4 Fines for violation of anti-corruption and anti- bribery laws paragraph 24 (a)	Indicator number 17 Table #3 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II)		Not material	-
ESRS G1-4 Standards of anticorruption and anti- bribery paragraph 24 (b)	Indicator number 16 Table #3 of Annex 1				Material	56

8.3 GFG ALIGNMENT TO UN SDGS

PPP Strategic Priority	Focus Areas and Contribution to SDGs	Relevant SDGs
Climate Action	• Lower Emission Logistics (9, 12, 13) • Renewable Energy and Energy Efficiency in our Facilities (7, 9, 12, 13) • Sustainable Assortment Strategy (12, 13) • Preservation of Natural Resources (12, 13, 15)	7, 9, 12, 13, 15
Circularity & Conscious Consumption	• More Sustainable Packaging (12, 13) • Responsible Waste Management (12, 13) • Circularity Solutions: Reuse and Recovery (12, 13)	12, 13
Fair & Ethical Sourcing	• Fundamental Human Rights and Decent Work (5, 8, 10) • Living Wages (8, 10) • Worker Dialogue and Collective Bargaining (8, 10) • Transparency (12) • Responsible Purchasing Practices (8)	5, 8, 10, 12
Responsible Workplace	• Workplace Health and Safety Management System (3) • Welfare of Our Employees and Agency Staff and Drivers (8, 10) • Mental Health and Wellbeing (3) • Hazard and Incident Reporting Management (3) • High Risk Activity Training and Controls (3)	3, 8, 10

PPP Strategic Priority	Focus Areas and Contribution to SDGs	Relevant SDGs
Diversity, Inclusion & Belonging	• D&I Policy Communications (10) • Regional Allyships Establishment (5, 10) • D&I Training and Awareness (5, 10)	5, 10
Responsible Business	• Anti-Bribery and Anti-Corruption Training Awareness (16) • Good Governance Optimisation Through Global Collaboration (16, 17) • Enterprise Risk Management Review and Refresh (16, 17)	16, 17

8.4 LIST OF FIGURES AND TABLES

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