



INDITEX



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I. DEFINITION OF safe to wear



I. DEFINITION OF **safe to wear**

safe to wear is defined as a product safety standard that:

- Has been developed by Inditex in conformity with the most stringent legislation on product safety.
- Regulates product features which if present in product could present hazards for safety such as entrapment, strangulation, tripping, choking, cuts and puncture wounds.
- Additionally **safe to wear** sets requirements for parameters not contemplated by the legislation but are considered to be best practice.
- Lastly **safe to wear** includes the General Product Safety Directive as the EU regulation of mandatory compliance for all Inditex suppliers.

safe to wear is of general and mandatory application for all clothing and textile products garments supplied to Inditex and certain accessories such as belts, hats and scarves.

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

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

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

The Supplier is responsible for the compliance of the products supplied to Inditex with **safe to wear**.

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

safe to wear wear is applied through the following families of products, which are defined according to article type:

- All clothing including hosiery and accessories intended for persons up to the age of 14 years ie. babies, infant's and children's clothing
- All Nightwear intended for persons up to the age of 14 years
- Adult Nightwear
- Adult Daywear and accessories

II. REFERENCE MANUAL



Flammability

1. What is it?

Flammability is defined as the ability of a material or product to ignite and burn with a flame under specified conditions. Fabric flammability performance is mainly classified according to flame spread speed and the way of the base fabric burns.

2. Where is the risk?

Non-acceptable flammability performance for a fabric, when it comes into contact with a flame, could be due to different factors. A particularly high risk arises from the use of the following fabrics and/or materials:

- 1) plain surface fabrics:
 - o Fabrics made of natural or regenerated fibers (e.g. cotton, viscose, linen, silk) with a fabric weight less than 90 g/m².
 - o Fabrics blend weighing less than 90 g/m² and made of natural or regenerated fibers and any of the following fibers (or a combination thereof): acrylic, modacrylic, nylon, olefin, polyester, wool.
- 2) All raised surface fabrics, especially those fabrics with a pile average length longer than 0.5 cm.
- 3) Fabrics made of or containing feathers.

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

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

For a more detailed information, please see **Annex I: Guide to Flammability**.

3. How is it regulated?

- EU Directive 2001/95/EC of the European parliament and of the council of 3 December 2001 on general product safety - General Product Safety Directive
 - Sweden Konsumentverket, Brandrisk i kläder (Fire hazard in clothes), enforced under GPSD
 - Netherlands National Voluntary requirement enforced under GPSD.
 - EN 14878:2007 Burning Behaviour of Children's Nightwear – Specification
- USA: Code of Federal Regulations CPSC "Flammable Fabrics Act (16 CFR II, Subchapter D)"
 - Code of Federal Regulations CPSC Part 1610 "Flammability of Clothing Textiles "
 - USA : Code of Federal Regulations CPSC "PART 1611 — Standard for The Flammability of Vinyl Plastic Film
 - USA CFR 1615 Standard for the Flammability of Children's Sleepwear: Sizes 0 Through 6X
 - USA CFR 1616 Standard for the Flammability of Children's Sleepwear: Sizes 7 Through 14
- Canada Textile Flammability Regulations, SOR/2011-22 CAN/CGSB-4.2 No. 27.5, entitled Textile Test Methods — Flame Resistance — 45° Angle Test — One-Second Flame Impingement, as amended from time to time.
- Canada Consumer Product Safety Act SOR/2011-15 Children's Sleepwear Regulations



- Australia: Consumer Goods (Children's Nightwear and Limited Daywear and Paper Patterns for Children's Nightwear) Safety Standard 2017.
 - AS/NZS 1249:2014 Children's nightwear and limited daywear having reduced fire hazard.
- China GB31701 safety technical code for infant and children's textile products.
 - CNTAC Guidance on Implementation of GB31701 Safety Technical Code for Infants and Children Textile Products
- Norway FOR-1984-02-13-427 Forskrift om forbud mot svært brennbare tekstiler (Regulations prohibiting highly flammable textiles)
- UK Regulation "The Nightwear (Safety) Regulations 1985, S.I. 2043 and Amendment 1987, S.I. 286. [NOTE specific dated standards apply to this regulation]
- Ireland SI 215/1979 Industrial Research and Standards (Section 44) (Children's Nightdresses) (Amendment) Order, 1979.

4. How is it analyzed?

- USA 16 CFR 1610.6 (similar to ASTM D1230-10 Standard Test Method for Flammability of Apparel Textiles) (not applicable to vinyl fabrics)
- USA 16 CFR 1611.4 (applies to vinyl fabrics only)
- ASTM D1230 Standard test Method for Flammability of Apparel Textiles.
- Canada: CAN/CGSB-4.2 No. 27.5, entitled Textile Test Methods — Flame Resistance — 45° Angle Test — One-Second Flame Impingement,
- AS/NZS 1249:2014 Children's nightwear and limited daywear having reduced fire hazard.
- China GB31701 safety technical code for infant and children's textile products.
 - GB/T 14644: Textiles burning behaviour 45° test determination of flame spread rate.
- UK:
 - BS 5722:1984 specification (Flammability performance of fabrics and fabric assemblies used in sleepwear and dressing gowns) test method.
 - BS 5438:1976 as amended on 30 April 1981 (Methods of test. Details of washing pre-treatments for flammability of vertically orientated textile fabrics and fabric assemblies subjected to a small igniting flame).
 - BS 5651 1978 (Cleansing and wetting procedures for use in the assessment of the effect of cleansing and wetting on the flammability of textile fabrics and fabric assemblies.
- Ireland: I.S. 148:1988 Flammability and Labelling Requirements of Fabrics and Fabric Assemblies Used In Children's Nightwear.
- EN 14878:2007 Burning Behaviour of Children's Nightwear - Specification
- EN 1103:2005 Textiles - Fabrics for apparel - Detailed procedure to determine the burning behaviour.
- EN ISO 6941:2003 Textile fabrics — Burning behaviour — Measurement of flame spread properties of vertically oriented specimens



5. What are the acceptable limits?

Daywear - for adults, children and babies.

INDITEX Global Flammability Requirements - Class 1 ¹			
Age group of wearer	Plain surface fabrics	Raised surface or napped/pile fabrics	Test method
Kids (from birth up to 14 years old)	trip thread severed in not less than 7 s	trip thread severed in not less than 7 s	ASTM D1230 1 s flame application
Adults (older than 14 years old)	trip thread severed in not less than 5 s		
¹ This is INDITEX requirement Class 1 for all fabrics, except vinyl materials.			

For country specific requirements, please see **Annex I: Guide to Flammability**.

Nightwear - Children

Europe: all children's nightwear garments.

Nightdresses, dressing gowns, bathrobes (except those made from 100% cotton terry towelling) ¹	
Up to 53 cm chest measurement, 3 month size	No testing required. Label Keep away from fire in accordance with UK and Ireland regulations
Over 3 months up to 14 years boys up to 182cm girls up to 176 cm	Meet UK regulations and requirements in BS 5722:1984, when tested in accordance with BS 5438:1978 300mm trip thread not severed in less than 25 s 600mm trip thread not severed in less than 50s Label in accordance with UK and Ireland regulations
¹ This is the UK requirement which is considered the most demanding	

Pyjamas, sleep suits, other nightwear with trousers and bathrobes made of 100% cotton terry towelling	
Garments for babies up to 6 months	No testing required. Label "Keep away from Fire"
Garments over 6 months up to 14 years boys up to 182cm girls up to 176 cm	Meet EN 14878:2007 Class A when tested according to EN 1103 520mm trip thread not severed in less than 15 s label "Keep away from Fire"

USA

Age group of wearer	Garment limitations	Test	Requirements
For infants up to 9 months	One piece garments not exceeding 25.75 inches (60.8cm) in any direction Two piece garments not exceeding 15.75 inches (40.0cm) in any direction	USA 16 CFR 1610.6	To meet 16 CFR 1610 class 1 or 2 (see USA Daywear above) and be labelled with size by age [in months].



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Age group of wearer	Garment limitations	Test	Requirements
Snug fit nightwear for children over 9 months up to X14 size	must meet the strict snug fit design , embellishment and sizing criteria in CFR 1615.1 or 1616.1 respectively,	USA 16 CFR 1610.6	To Meet 16 CFR 1610 class 1 or 2. (see USA Daywear above) be permanently and correctly labelled and carry the prescribed yellow hang tag 1.5inches x 6.25inches (3.8 cmx 15.9cm) stating "For the child's safety this garment should fit snugly. This garment is not fire resistant. Loose-fitting garment more likely to catch fire".
All other children's nightwear and sleepwear up to X14, including all fabric not treated with fire retardant		When tested to CFR1615.4 or CFR 1616.5 must be sampled as defined in CFR 1615 or CFR 1616, be tested as produced or after 1 wash and dry cycle AND after 50 wash and dry cycles, then tested according to CFR 1615.4 or CFR1616.5.	1) Average char length. The average char length of five specimens must not be more than 17.8 cm. (7.0 in.). 2) Full specimen burn. No individual specimen may have a char length of 25.4 cm. (10 in.).

Canada

Garment type	Test	Requirements
Babies Up to 7 KG and Garments with chest measurement up to 508mm	CAN/CGSB-4.2 No. 27.5, 45° Angle Test	Time to sever trip thread more than 7s
Snug fitting garments (as defined in SOR 2011/15)	CAN/CGSB-4.2 No. 27.5, 45° Angle Test	Time to sever trip thread more than 7s
Loose fitting garments (as defined in SOR 2011/15)	When tested as produced or after 1 wash and dry cycle AND after 50 wash and dry cycles, then tested as described in CFR 1615.4 or CFR1616.5:	1) Average char length. The average char length of five specimens must not be more than 17.8 cm. (7.0 in.). AND 2) Full specimen burn. No individual specimen may have a char length > 25.4 cm. (10 in.).

Canada labelling requirements are that where fire retardants are applied, this must be stated on the label as "flame retardant" and full cleaning instructions provided in English and French.

Australia / New Zealand

AS/NZ 1249:2014 provides strict design, styling and sizing limitations, with flammability performance requirements. Infant sleep bags, and towels and blankets with sleeves or armholes are also included. Permanent labelling requirements are stringent.

The 4 categories of garment vary by type, fibre composition, fabric mass, design, styling, and size. Different kinds of mandatory warnings and labelling are also required.

Category	Garment limitations	Test	Requirements
1	Garments made from fabric of the low fire hazard type and which comply with Section 1 of AS/NZ 1249:2014	ISO 6941	Flat Fabrics: Average flame spread more than 12s ¹ . No single determination less than 10 s. Fabrics with pile: Average flame spread not less than 10s



Category	Garment limitations	Test	Requirements
2	Garments which are designed to be form fitting to reduce fire hazard and comply with Section 2 of AS/NZ 1249:2014	ISO 6941	All samples flame spread more than 10s.
3	Predominantly knitted all in one garments with a pile or nap, in sizes 00 - 2 which comply with Section 3 of AS/NZ 1249:2014	ISO 6941	All samples flame spread more than 10s.
4	Garments which may not comply with Section 1,2 or 3, but which comply with Section 4 of AS/NZ 1249:2014	ISO 6941	All samples flame spread more than 10s. Specific labelling as defined in AS/NZ 1249:2014

¹ Note the flame spread times defined in AS/NZ 1249:2003 relate to the elapsed time between severing 1st and 3rd trip threads in ISO 6941.

China

All nightwear for children up to 160cm must meet the same requirements as daywear.

Nightwear - Adult

Europe

All garments to be labelled “Keep away from Fire” in accordance with the UK Regulation. The Netherlands’ covenant on fire safety of nightwear applies the requirements below OR garments must carry the labelling prescribed in the Netherlands Covenant.

Country	Testing	Requirements
Netherlands	When tested to EN 1103 with a 5s flame application time	520 mm trip thread must not sever in less than 10 s. Falling flaming debris must not ignite the filter paper within 10s
	When tested to EN 1103 with a 1s flame application time	Surface flash must be less than 520 mm.
Norway	ASTM D1230 with 1s flame application time	Time to sever trip thread more than 5 s
Sweden	ASTM D1230 with 3s flame application time.	Time to sever trip thread more than 5 s

USA and Canada

Adult nightwear must meet the same requirements as daywear.

6. How can it be avoided?

The risk of a bad flammability performance of a garment can be avoided by a correct selection of the fabrics and an appropriate garment design construction in order to reduce the rate of flame spread. This could be achieved by applying, among others, the following preventive measures and production control:

- Selection of thicker and heavier fabrics.
- Use of a closer fabric construction.
- Choose preferably synthetic fibers or intimate blends of yarns if possible.
- Apply correct flame retardants in compliance with our Clear to Wear requirements.

For a more detailed information, please see **Annex I: Guide to Flammability**.



Mechanical Safety: Cords Drawstrings and Loops

1. What are they?

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

2. Where is the risk?

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

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

This risk shall be considered and evaluated in all garments intended to be worn by Children from birth up to 14 years.

For a more detailed information, please see **Annex II: Guide to Mechanical Safety. Cords, Drawstrings and Loops.**

3. How are they regulated?

- EU Directive 2001/95/EC of the European parliament and of the council of 3 December 2001 on general product safety - General Product Safety Directive
 - EN 14682: 2014 Safety of children's clothing — Cords and drawstrings on children's clothing — Specifications
- USA CPSIA: 16 CFR II Consumer Products Safety Improvement Act 2008.
 - ASTM F1816-97 Standard Safety Specification for Drawstrings on Children's Upper Outerwear
 - New York State General Business Law, Section 391-b (2) and Wisconsin State Law. ATCP 139.055 Banned children's products.
- China GB 31701-2015 Safety Technical Code for Infants and Children Textile Products.
 - CNTAC Guidance on Implementation of GB31701 Safety Technical Code for Infants and Children Textile Products
 - GB/T 22702-2008 Standard Safety Size for Drawstrings on Children's Upper Wear
 - GB/T 22705-2008 Safety Specifications for Cords and Drawstrings on Children's Clothing
- Japan JIS L 4129 Safety of children's clothing - Cords and drawstrings on children's clothing - Specifications
- Korea (South) KS K 0941: 2014 Safety of children's clothing—Cords and drawstrings on children's clothing—Specifications
- Brazil NBR 16365:2015 Safety Of Children's Clothing - Specifications of Fixed Strings and Adjustable Cords on Children's Clothing, Haberdashery In General - Physical Hazards.

4. How are they analyzed?

They are analyzed by visual inspection against criteria specified in:

- EN 14682:2014 Safety of children's clothing — Cords and drawstrings on children's clothing — Specifications



- ASTM F1816-97 Standard Safety Specification for Drawstrings on Children's Upper Outerwear
- China GB 31701-2015 Safety Technical Code for Infants and Children Textile Products.
 - CNTAC Guidance on Implementation of GB31701 Safety Technical Code for Infants and Children Textile Products
 - GB/T 22702-2008 Standard Safety Size for Drawstrings on Children's Upper Wear
 - GB/T 22705-2008 Safety Specifications for Cords and Drawstrings on Children's Clothing
- GPSD Risk assessment.

For a more detailed information please see **Annex II: Guide to Mechanical Safety. Cords, Drawstrings and Loops.**

5. What are the acceptable limits?

Garment features such as drawstrings, cords, loops, ties, adjusting tabs etc (both functional and decorative) are prohibited in certain areas of the body and limited in length depending on the type of garment and the age of the wearer.

For a more detailed information (definitions, areas of the body, pictures, how to measure, etc...), please see to **Annex II: Guide to Mechanical Safety. Cords, Drawstrings and Loops.**

Inditex Global Standard:

General Requirements (0 up to 14 years old)
<ul style="list-style-type: none"> - No knots or 3D embellishments on free ends or along the length of drawstrings, functional cords, or tied belts or sashes. - Toggles allowed only on drawstrings with no free ends or in decorative cords. - Drawstrings, to be attached to the garment in at least one point equidistant from the exit point. - Zip puller max. 7.5cm in length. - Fixed protruding loops or loops in fixed bows shall be no more than 7.5cm in circumference. - Flat loops, no more than 7.5cm in length.

Head, neck and upper chest area (Zone A)	
Young children (0 to 7 years old)	Older children and young persons (7 up to 14 years old)
<ul style="list-style-type: none"> - Drawstrings or functional cords are not permitted. - Decorative cords: NOT permitted on hood or back of the neck. In neck or upper chest area, decorative cords shall: <ul style="list-style-type: none"> - max. length of free ends less than 7.5 cm - not made from elastic or able to tie across the throat - no knots or 3D embellishments - Adjusting tabs: Max. 7.5cm in length and with no toggle, button or buckle in the free end that may present an entrapment hazard. - Shoulder straps: no free ends external to the garment when worn, adjustment is allowed inside the garment, or clip or fastening if any loop formed lies flat to the body when worn. Decorative cords on shoulder straps with no free ends >7.5cm long or fixed loops no more than 7.5cm in circumference. - Halter neck-style garments to have no free ends in the neck and throat. 	<ul style="list-style-type: none"> - Drawstrings: No free ends and no protruding loop when the garment is open to its largest and laid flat; when open to its smallest, max loop circumference less than 15 cm; adjustment toggles, if used, to be fixed to the garment. - Functional cords: 7.5cm max length and not made of elastic. - Decorative cords: max 7.5cm. including any attachment or 3D embellishment and not made of elastic. - Adjusting tab: same as for young children. - Shoulder straps: Free ends no longer than 14cm from the point at which they are to be tied; fixed loops max 7.5cm in circumference; if adjustable, the strap including any loop to lie flat when worn. - Halter neck-style garments to have no free ends in the neck and throat.



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Chest and waist area (Zone B - All ages)	
Garments worn from waist down (without shoulder straps, braces, or sleeves - such as trousers, shorts, skirts, briefs, bikini bottoms) :	<p>SHALL NOT HAVE:</p> <ul style="list-style-type: none"> a) Free ends of drawstrings longer than 20cm at each end (measured in a relaxed natural state). b) Protruding loops on drawstrings with no free ends, when the garment is open to its largest and laid flat. Toggles for adjustment of drawstrings with no free ends, must be fixed to the garment. c) Functional cords longer than 20cm. d) Decorative cords longer than 14cm including any embellishment.
Other garments (such coats, shirts, dresses, dungarees...):	<ul style="list-style-type: none"> a) Free ends of drawstrings longer than 14cm at each end (measured when open to its largest and laid flat). b) Same as garments worn from waist down. c) Functional cords longer than 14cm. d) Same as garments worn from waist down.
<ul style="list-style-type: none"> - Adjusting tabs not longer than 14cm. - Tied belts or sashes intended to be tied at the front or at the side of the garment shall be no more than 36cm in length from the point where they are to be tied. - For young children (0 up to 7 years old): tied belts or sashes intended to be tied at the back, must not hang below the hem of the garment when untied. 	

Lower edge of garments which hang below the crotch (Zone C – All ages):
<ul style="list-style-type: none"> - Include garments where the hanging position is unclear. - Drawstrings, functional cords or decorative cords, including any toggle, shall not hang below the lower edge of the garment and shall lie flat against the garment when is tightened or fastened. - Drawstrings, functional cords or decorative cords shall not be outside the garment in garments designed to finish at the ankle, such as trousers, skirts and coats. - Adjusting tabs: no longer than 14cm, no entrapment hazard on the free end (such buckle, button or toggle) and not hang below the lower edge of the garment.

Back area (Zone D - All ages) :
<ul style="list-style-type: none"> - No drawstrings or functional cords to emerge from the back of the garment or to be tied at the back. - Decorative cords no longer than 7.5cm and shall not have any toggle, knot or any other 3D element that could present an entrapment hazard. - Adjusting tabs no longer than 7.5cm, shall not have any entrapment hazard on the free end, and shall not hang below the lower edge of the garment. - For tied belts or sashes, same requirements as in the chest and waist area.

Sleeves (Zone E - All ages):
<ul style="list-style-type: none"> - Drawstrings, functional cords and decorative cords: <ul style="list-style-type: none"> - At the lower edge of long sleeves shall not be outside the garment when the garment is fastened. - If positioned below the elbow on long sleeves, shall not hang below the lower edge. - Free ends shall be no longer than 7.5cm. - On short sleeves, provided the sleeve finishes above the elbow, maximum protruding length shall be less than: <ul style="list-style-type: none"> -For young children (0 up to 7 years old): 7.5cm. -For older children (7 up to 14 years old): 14cm. - Adjusting tab: no longer than 10 cm in length and not hang below the edge of the sleeve when open.

Other parts of the garment:
<p>Drawstring, functional and decorative cords: to protrude not more than 14cm when the garment is open to its largest and laid flat.</p>



China specific Requirements:

General:

- Cords and drawstrings definition implies a ratio in length to width more than 2:1.
- Zip pullers are limited to 40mm in length.
- Free ends of any type of cord shall not have knots, toggles or any other 3D embellishments.

Head and neck area (Zone A)

Young children (0 to 7 years old):

- Decorative cords are NOT allowed.
- Bows are only permitted in the head and neck areas if stitched to the garment so there are no loops or cords with free ends.
- Hats with decorations such as ears or antenna are permitted only if the length to width ratio is less than 2:1, and they do not meet the definitions for cords or drawstrings in GB 31701.
- Halter neck-styles [neck straps] are not permitted.
- Shoulder straps must be continuous and attached at the front and back by sewing, or they may be adjustable using buttons only, provided the button is attached to the garment and not the shoulder strap. The use of press fasteners and clips are not permitted.

Children over age 7 up to 14 years old:

- No functional cords or adjusting tabs.

Waist area (Zone B or Zone C):

- Where sashes are attached to the garment and for other cords and drawstrings fixed in the waist area, the maximum free end length is 36cm measured from the fixed point, and may not hang below the hem of the garment for children up to 7 years old.
- When garment is open to its largest and laid flat, free ends of cords and drawstrings shall be no longer than 140 mm.

Important: belts and sashes which are > 3cm in width and not attached to the garment are not in scope of GB 31701, but should not hang below the hem of the garment.

Back area (Zone D – All ages)

- Decorative cords, adjusting tabs or fringes are not permitted.
- “Invisible” Zip pullers are permitted

Sleeves (Zone E – All ages)

- Adjusting tabs are considered as a type of cords, so its length shall be limited to a max. of 75 mm.

The following are however out of scope:

- Accessories sold as a set but not attached to a garment (e.g. suspenders, bow tie, and belts).
- Completely detachable fabric belts wider than 3cm and to be worn around the waist.
- Any cord or drawstring fixed inside of the garment and not exposed outside in wear.

6. How can they be avoided?

Cords, drawstrings, loops and similar features on garments present hazards of accidental entrapment. The hazard is largely determined by the position on the garment of these features and their length or size. They can be minimised by producing garment designs that comply with EN 14682:2014 and controlling production variation such that critical parameters are not exceeded.

For a more detailed information please see **Annex II: Guide to Mechanical Safety. Cords, Drawstrings and Loops.**



Mechanical Safety: Components, Materials and Construction

1. What is it?

Features and components of garments that may present a hazard of choking, aspiration or ingestion; cuts and piercing etc. Such features include small parts, security of attachment of “components” (buttons, press fasteners, rivets, sequins etc.), sharp edges and points.

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

2. Where is the risk?

Components and manufacturing processes present, or can introduce, hazards such as choking, aspiration or ingestion, cuts and piercing etc. in garments and related products. These hazards are included but not limited to small components of the garment or other type of sharp points or sharp edges reachable by the user. A particularly high risk arises from the use of the following processes and/or materials:

- Components attached by hand stitch.
- Buttons made of natural materials like wood, mother of pearl, etc.
- Fabrics used to support a sewn-on component not strong enough.
- Weak quality control in production.
- Garment dyeing, where attached components could be weakened.

The specific requirements are mandatory for all garments intended by design, production or selling route to be worn by babies (from birth to 12 months) and infants (12 months to 36 months). Certain aspects are also required for garments intended to be worn by children up to 14 years of age.

Garments include: i) baby clothing; ii) all children’s garments (including nightwear/sleepwear, hosiery/socks) iii) garment accessories including bonnets, hats, gloves, scarves etc. Requirements vary according to the age of the wearer.

For a more detailed information please see **Annex III. Guide to Mechanical Safety. Components, Materials and Construction.**

3. How are they regulated?

- EU Directive 2001/95/EC of the European parliament and of the council of 3 December 2001 on general product safety - General Product Safety Directive.
 - CEN/TR 16792:2014 Safety of children’s clothing — Recommendations for the design and manufacture of children’s clothing — Mechanical Safety.
 - EN 16732:2015 Slide fasteners (zips) — Specification.
 - Spain UNE 40902:2008 Safety of baby garments. Physical and mechanical properties.
 - UK BS 7907:2007 Code of practice for the design and manufacture of children’s clothing to promote mechanical safety.
- China GB 31701-2015 Safety Technical Code for Infants and Children Textile Products.
 - CNTAC Guidance on Implementation of GB31701 Safety Technical Code for Infants and Children Textile Products.
- Malaysia MS 1726:2004 Code of practice for the design and manufacture of children’s clothing to promote mechanical safety.



- Brazil NBR 16365:2015 Safety Of Children's Clothing - Specifications of Fixed Strings and Adjustable Cords on Children's Clothing, Haberdashery In General - Physical Hazards.
- United States of America CPSA: 16 CFR II Consumer Products Safety Improvement Act 2008. CHAPTER II Consumer Product Safety Commission
 - 16 CFR II, Subchapter D, Part 1500 Hazardous Substances and Articles; Administration and Enforcement Regulations

4. How are they analyzed?

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

- CEN/TR 16792:2014 Safety of children's clothing — Recommendations for the design and manufacture of children's clothing — Mechanical Safety
- UNE 40902:2008 Safety of baby garments. Physical and mechanical properties.

and/or by

- GPSD Risk assessment.

For a more detailed information please see **Annex III. Guide to Mechanical Safety. Components, Materials and Construction.**

5. What are the acceptable limits?

Requirements and testing vary depending on the type of garment and the age of the wearer:

Removable Parts

Small parts test:

Scope	Garments for babies and infants.
Application	Removable parts are any component or accessory which is intended to be capable of being separated from the garment. Examples include stickers, brooches, etc...
Age of wearer	Up to age 3 years
Standard(s)	UNE 40902, CEN TR 16792, CFR 1500
Test Method	UNE 40902 - Small Parts Test / CEN TR 16792 Annex H
Requirement	Removable parts must not be small parts - Items must not fit entirely within the test cylinder.

Durability of removable rigid parts:

Scope	Garments for babies and infants.
Application	Removable rigid parts are any component or accessory which is intended to be capable of being separated from the garment. Examples include stickers, brooches, etc)
Age of wearer	Up to age 3 years
Standard(s)	UNE 40902, CFR 1500
Test Method	UNE 40902 - Torque Test and UNE 40902 - Tension Test and UNE 40902 - Small Parts Test UNE 40902 Sharp points test and UNE 40902 Sharp Edges Test
Requirement	When subjected to Torque and Tension testing removable parts must not produce parts that are small parts, have sharp points or sharp edges.



Attached Components - grippable

Resistance to pulling:

Scope	Garments for babies and infants.		
Application	To any rigid component that is attached, not intended to be removable, and would if detached constitute a small part (UNE 40902 - Small Parts Test): examples include Sewn buttons, Pressure fasteners (studs, snaps and rivets, among others), Clasps with catches, Buckles, Hooks, Zipper parts, and any other general adornments.		
Age of wearer	Up to age 3 years		
Standard(s)	CEN TR 16792, UNE 40902		
Test Methods	Largest grippable dimension is		
	$\geq 6 \text{ mm}$ CEN TR 16792 Annex B	$>3 \text{ mm but } < 6 \text{ mm}$ CEN TR 16792 Annex B	$\leq 3 \text{ mm}$ CEN TR 16792 Annex C
Requirement	Minimum removal force 70 N	Minimum removal force 50 N	No change or Negligible change

Resistance to twisting (torque):

Scope	Garments for babies and infants.
Application	To any component that is attached, not intended to be removable, and would if detached constitute a small part. Examples include sewn buttons, press fasteners (studs, snaps and rivets, among others), clasps with catches, buckles, hooks, zipper parts, and other general adornments.
Age of wearer	Up to age 3 years
Standard(s)	UNE 40902
Test Methods	UNE 40902 Torque Test - See guidance on Mechanical Safety
Requirement	0.35 Nm

China: For children up to age 3 years old, attached components with larger dimension less than 3 mm. are not recommended. All other attached components must meet these removal force requirements when tested resistance to pulling according to GB 31701 Annex A 4.1.

Attached components - non-grippable

Security of attachment:

Scope	Garments for babies and Infants
Application	To any component that is attached, not intended to be removable, and would if detached constitute a small part. Examples include but not limited to sequins, glitter, rhinestones, etc.... and decorative items attached by bonding, adhesive, etc.
Age of wearer	Up to age 3 years
Standard(s)	CEN TR 16792
Test Method	CEN TR 16792 Annex C
Requirement	No change or Negligible change.



Sharp Points

Scope	Garments for Babies, Infants and Children
Application	To any component, part or garment assembly. Examples include: labels, buttons, press fasteners (studs, snaps and rivets, among others), Clasps with catches, Buckles, Hooks, Zipper parts, and other general adornments.
Age of wearer	Up to age 14 years (to comply with the Chinese requirement)
Standard(s)	UNE 40902, GB 31701, 16 CFR 1500, CEN TR 16792
Test Method	UNE 40902 Sharp points test
Requirement	Maximum penetration, 0.5 mm under test.

USA: For children aged from 3 up to 7 years old, pulling test shall be performed with a minimum requirement of 66,8 N and torque test with a minimum requirement of 0,45 Nm. After this use and abuse test, component tested shall be evaluated according to sharp points and sharp edges requirements.

Sharp edges

Scope	Garments for Babies, Infants and Children
Application	To any accessible component, part or garment assembly. Examples include labels, buttons, press fasteners (studs, snaps and rivets, among others), clasps with catches, buckles, hooks, zipper parts and other general adornments.
Age of wearer	Up to age 14 years (to comply with the Chinese requirement)
Standard(s)	UNE 40902, GB 31701, 16 CFR 1500, CEN TR 16792
Test Method	UNE 40902 Sharp Edges Test
Requirement	Maximum length of cut, 50%.

USA: For children aged from 3 up to 7 years old, pulling test shall be performed with a minimum requirement of 66,8 N and torque test with a minimum requirement of 0,45 Nm. After this use and abuse test, component tested shall be evaluated according to sharp points and sharp edges requirements.

Foreign objects

Foreign objects are defined as any item that should not be present or is not intended to be part of the garment and that may be a hazard. Examples include needles, pins and loose components.

Scope	Garments for Babies, Infants and Children
Application	To foreign objects that should not be present such as needles, pins, loose components etc.
Age of wearer	Up to age 14 years
Standard(s)	UNE 40902, GB 31701, CEN TR 16792; 16 CFR 1500
Test Method	Inspection ¹
Requirement	None to be present.

¹ **Note** Inditex Metal Detection Policy is a mandatory requirement to assure compliance in respect of ferrous metal items and broken needles. For a more detailed information, please see Annex IV. Metal Detection Policy

6. How can they be avoided?

By producing garment designs and controlling production in accordance with CEN/TR 16792.

For a more detailed information please see **Annex III. Guide to Mechanical Safety. Components, Materials and Construction.**

III. EU REGULATION OF MANDATORY COMPLIANCE



III. EU REGULATION OF MANDATORY COMPLIANCE

General Product Safety Directive.

What is it?

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

Is it of mandatory compliance?

The GPSD is mandatory for all suppliers that manufacture, distribute and/or supply product imported or commercialized into European Union member States, and requires all products to be safe or pose only the minimum of risk in normal use and foreseeable use for the life time of the product.

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

Specific requirements for safety or “acceptable risk” are not defined; this is the responsibility of the manufacturer, retailer, importer etc. to decide. A product is presumed to conform to the general safety requirement if it is in compliance with the appropriate European and national legislation or standards and, where no specific European and national legislation or standards exist, product safety should be assured by Risk Assessment.

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

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

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

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

ANNEX I: GUIDE TO FLAMMABILITY



ANNEX I: GUIDE TO FLAMMABILITY

Introduction

By definition, any material capable of burning with a flame is considered flammable. All fibre types commonly used in clothing are capable of burning with a flame, so are flammable.

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

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

The design and construction of the garment will also have an impact on its flammability performance and this should be considered as part of garment safety assessment along with the potential impact of any non-textile materials and components.

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

As all textiles will burn, Inditex's goal is to sell garments made from the safer fabrics, that is those which ignite less readily and burn more slowly or self-extinguish; and comply with safety requirements globally. The requirements specified in the reference manual are mandatory and can be achieved by producing garment designs using appropriate fabrics and styles.

Flammability Testing and Certification

Globally, flammability testing and certification is based on measuring a combination of the ease of ignition and rate of flame propagation. In most tests, a small panel of the fabric is held in a frame and a flame (with specific characteristics) is applied for a defined length of time; if ignition occurs the time for the burning to reach a defined point on the sample is measured. However significantly different protocols and different test apparatus and configurations are used and as a consequence test results and performance requirements are not comparable.

This section provides guidance to be followed to ensure all children's and adults' garments produced for Inditex group achieve flammability performance to comply with global legal compliance and consumer safety, with the minimum of product testing.

NOTE: Certification and flammability test certificates are needed in specific countries under importation regulations.

Guidance on Selection of fabrics for flammability performance

Typical sources of ignition involved in clothing fires, where the clothing being worn is the first item to ignite, are candles, open fires, gas hobs, matches and smoking materials. If the fabric of clothing comes into contact with the flame it is probable the fabric will ignite. The flammability hazard is clearly related to the speed or ease of ignition under these circumstances, and the Rate of flame spread, or Propagation - how fast the flame consumes the fabric - as the slower these occurs the greater the opportunity for the wearer to react to and extinguish the flames.



If the flame passes very rapidly over the raised surface fibres (hairs) of a fabric and the base fabric is not consumed, this is termed Surface flash flame. In general this occurs when a very rapid cool burning flame passes between the raised fibres, consuming each fibre so quickly that insufficient heat is generated to ignite the base fabric. As a result, in itself, surface flash flame very rarely leads to burn injury; but as the flash of flame will often shock the wearer and this may lead to other injuries, it is nevertheless unacceptable.

It is well documented that the chemical composition of the fibres, and their physical properties - influence ease of ignition and rate of flame propagation (spread). Different fibre types exhibit different burning behaviours and can usefully be split into three groups:

Group A	Wool and similar animal fibres	e.g. wool, cashmere, alpaca, mohair
Group A1	Fibres that melt	e.g. polyester, nylon (polyamide), acrylic, modacrylic, olefin,
Group B	Other natural or regenerated fibres	e.g. cotton, viscose, flax, silk, bamboo fibre, Lyocell

Fibre types in **Group A** tend to be resistant to ignition and exhibit a tendency to self-extinguish. Those in **Group A1** melt and so tend to fall away or shrink away from the source of ignition and also self-extinguish. Those in **Group B** are not resistant to ignition and have higher ease of ignition and higher rate of flame spread.

The geometric configuration of the fibres and yarn influence both ease of ignition and the rate of flame spread by altering the ratio of fuel to oxygen. The looser the fibre in the yarn, the more easily it will ignite. Fabrics of higher density, tighter weave or knit tend to provide lower ease of ignition and rate of flame spread.

Surface characteristics of fabric and in particular brushed or raised finishes tend to ignite easily and are particularly susceptible to surface flash.

Applied chemical finishes can totally change the flammability performance compared to the untreated fabric. Siliconized finishes for example are known to have a severely detrimental effect on flammability performance.

The design and construction of the garment will also have an impact on the flammability performance and for this reason in certain markets design constraints are included in their requirements, particularly for children's nightwear.

How to select fabric that will have the necessary flammability performance.

Based on many years of experience, it has been found that pure finish fabrics of certain weight or fibre types and fabric constructions have been shown to reliably deliver the necessary flammability performance and meet the requirements without testing: that is they always pass.

Confidence in this approach is such that for adult garments in the USA (since 2016), it is no longer mandatory to have certification to demonstrate flammability performance. Exemption from certification may be officially determined using weight of fabric, fibre composition and surface characteristics. Fabrics outside these criteria require testing and certification as indicated in the table below:

Fabric			Testing	
Weight	Group	Surface	Rate of flame Spread	Surface Flash
≥ 90 g/m ²	A / A1	Flat	NO	NO
		Raised	NO	Required
	B	Flat	NO	NO
		Raised	Required	Required



Fabric			Testing	
Weight	Group	Surface	Rate of flame Spread	Surface Flash
< 90 g/m ²	A / A1	Flat	NO	NO
		Raised	NO	Required
	B	Flat	Required	NO
		Raised	Required	Required

For children's daywear garments, certification remains a requirement, but using these guidelines will help in choosing those textile materials which are most likely to meet the requirements, eliminating unnecessary testing. For children's nightwear, flammability testing will be required, but these notes will help with the selection process.

Country specific requirements and acceptable limits

Test method and requirements vary according to country. Details of the testing are in the requirements table below:

Country		Test	Requirements	
			Flat fabrics	Raised surface or napped/pile fabrics
USA All fabrics except vinyl materials	Class 1	CFR 1610.6 (ASTM D1230) 1 sec flame application.	trip thread severed in not less than 3.5s	trip thread severed in not less than 7.0s OR no base fabric burns.
	Class 2	CFR 1610.6 (ASTM D1230) 1 sec flame application.	-	Trip thread severed in 4.0s -7.0s with base burn.
USA Non-rigid unsupported vinyl plastic films and fabrics only		CFR 1611.4 Average of 5 specimens each in length and width direction	1.2 inches/second (3.048cm/s)	1.2 inches/second (3.048cm/s)
Canada		CAN/CGSB-4.2 No. 27.5	Must take more than 3.5s to sever the trip thread	Must take more than 4.0s to sever the trip thread
Netherlands		ASTM D1230 - 1 s flame application.	Trip thread not severed in less than 3.5s	trip thread severed in not less than 4.0s
China All clothing for children up to 160cm:		GB 31701 / GB/T14644 Wool, acrylic, modified acrylic, polyamide, polypropylene and polyester textiles and blends of these fibres, and fabrics >90g/m ² . are not tested	Trip thread not severed in less than 3.5s	trip thread severed in not less than 4.0s
Sweden		ASTM D1230 - 3 sec flame application	to sever trip thread in more than 5.0s	
Norway Outerwear for children up to 170cm:		ASTM D1230 - 1 sec flame application.	More than 7.0s to sever trip thread	
All other daywear clothing:		ASTM D1230 - 1 sec flame application.	More than 5.0s to sever trip thread	
Australia Daywear and Underwear, commonly worn as nightwear for children.		Same as nightwear	Same as nightwear	
UK and Ireland Garments for children up to 3 months		None	Labelling requirements only	



Factors to consider when choosing fabrics for Inditex's garments:

Fibre composition

Synthetic fibres which melt when a flame is applied, for example polyester, polyamide and polyacrylonitrile, and animal fibres such as wool, mohair, cashmere, but NOT silk, do not ignite easily and are slower to propagate flames.

Cellulosic fibres like cotton and flax, and regenerated fibres such as viscose or Lyocell, can ignite more easily and propagate flames more readily. The behaviour of Silk, because of its chemistry and fibre structure, is similar in behaviour to these cellulosic fibres.

Yarns for weaving or knitting

The tighter (higher) the twist of the yarns, the more difficult it is to ignite a fibre, and the lower the rate of flame spread.

Fabric composition

Blended fabrics are typically constructed either of blended yarns - the yarn being composed of an intimate blend of different fibres - or of a mixture of yarns each of different fibres and the flammability performance tends to be different. Where fabrics are made of intimate blended yarns, for example polyester and cotton, the rate of flame spread will be better than for a fabric made of separate polyester yarns and cotton yarns. In the latter, the synthetic yarns will melt and allow more air in the spaces leading to hotter and faster flame. Choose intimate blends of yarns for more predictable performance.

Fabric construction (weave or knit)

The closer the fabric construction, increased ends and picks or courses and wales per cm, the better the fabric performance. The thicker and heavier the fabric, the slower the rate of flame spread. Experience in USA has led to the acceptance that fabrics weighing more than 90g/m² do not require testing provided they have a flat surface.

Raised, brushed or hairy surface fabrics

The raised surface may result in rapid burning surface flash flame which does not usually result in ignition of the base fabric: the surface fibres singe only with the fibres burning very rapidly, approximately 2s or less to travel 500mm. Typical fabrics which can be a problem are sweat shirt (cotton or regenerated cellulose brush back fabrics), terry towelling, velvet, velour, knitwear with ramie yarns, brushed cotton and winceyette fabrics. These will require testing regardless of weight.

Where fabrics are cropped, care must be taken during production to fully remove any cut loops and threads. This is particularly importance with towelling or velvet and velour, where the cut debris can act as a wick to promote ignition, either of the test sample or in real life situations. Use of suction to remove cut fibres during the cropping stages is recommended.

Applied chemical finishes

Certain finishes can have an adverse effect on flammability performance, these include:

- siliconized finishes often used for softness or fluffiness,
- resin finishes to attach glitter and other similar glued-on decoration,



Where fabrics of any composition or type have had chemical finishes applied, it should be assumed that the flammability performance will be different to that of the untreated fabric. Test results for the untreated fabric will no longer be valid. If for example printing is carried out in garment form (printed design on a tee shirt) the performance of the print must be considered.

Garment design considerations

Fabrics which are totally encased by the garment construction - for example interlinings - are considered not to be exposed to ignition sources and hence are in general excluded from regulation.

Lining materials which are not exposed on the outside of the garment in wear, are similarly excluded from regulation in certain countries such as China. However consideration must be made of the configuration of the garment in wear as features such as turned cuffs, hood linings and jacket openings may expose the lining or internal surfaces. In these cases the flammability performance of the internal fabric should be considered and chosen appropriately.

Globally, children's nightwear requirements include garment design and fit constraints, recognising that longer and more flowing garments may be more likely to brush against or through sources of ignition. The design constraints in these cases are fundamental to compliance. The principles here however should be taken into account in the design and selection of all garments.

Note on Leather, coated fabrics, plastic films, and other non-textile materials

A number of non-textile materials and coated textiles can be used in garments such as Leathers, synthetic leathers, coated fabrics, and non-woven foamed synthetic fabrics. The flammability performance of these varies dramatically.

Coated fabrics means a fabric composed of a textile and any adherent polymeric material applied to one or both surfaces, like polyurethane textiles or synthetic leather. Vinyl (PVC) coated fabrics require testing to specific tests and have different performance requirements to normal fabrics.

Real Leather is generally recognised as having very good flammability performance and there are no testing requirements. However the impact of any surface finish or decoration should be considered.

The potential flammability behaviour of all these materials and any novel fabrics, should be considered in the garment risk assessment and in particular their contribution to the flammability performance when made up into the garment.

ANNEX II: GUIDE TO MECHANICAL SAFETY. CORDS, DRAWSTRINGS AND LOOPS



ANNEX II: GUIDE TO MECHANICAL SAFETY. CORDS, DRAWSTRINGS AND LOOPS

Introduction

Cords, drawstrings, loops and similar features on garments present hazards of accidental entrapment. The level of risk is largely determined by the position on the garment of these features and their length or size. These requirements are designed to minimise these risks and are mandatory for all garments intended by design, production or selling route to be worn by children up to the age of 14 years. Certain requirements apply up to the age of 16 years in specified countries.

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

A - head, neck and upper chest area,

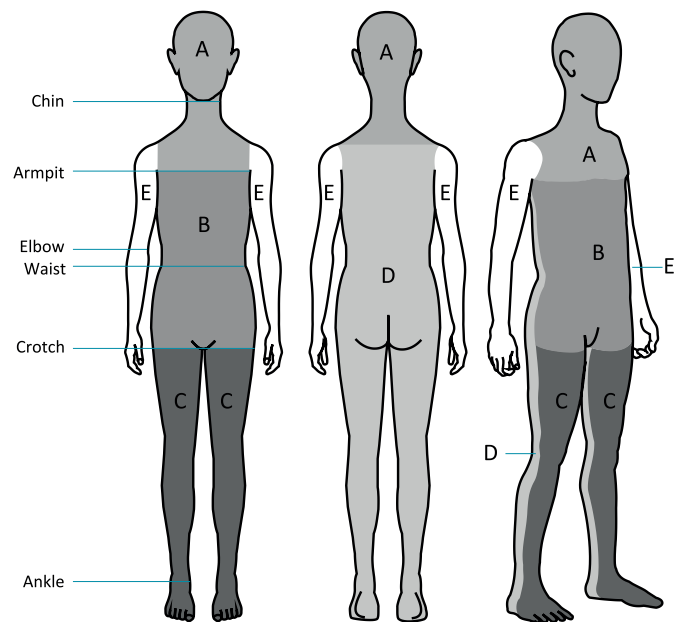
B - chest and waist area,

C - below crotch area,

D - back area,

E - arms (sleeves) area.

Requirements apply to features both inside and outside the garment.



The hazards presented by particular garment features are also influenced by the behaviour of the wearer which in turn is mainly governed by their age. A feature that presents no hazard to an adult may be a significant hazard for a young child as they obviously behave differently. Specifications are therefore also related to wearer's age and are applied to garments according to the age and height of the wearer for which the garment is intended:

Garments for young children: are those for children aged from birth up to age 7 years (that is up to their 7th birthday) and those intended for children whose height is 134 cm or below.

Garments for older children and young person: are those for children aged from 7 years up to age 14 years (that is up to their 14th birthday) and those intended for all boys of height greater than 134 cm up to 182 cm and girls of height greater than 134 cm up to 176 cm.

Most of these requirements are derived from EN 14682:2014 Safety of children's clothing — Cords and drawstrings on children's clothing — Specifications; and references to its clauses are included [in brackets] in the requirements section below. Many Standards and Regulations globally mirror these requirements or have directly adopted the specification. However certain countries apply different requirements so these are noted in the text.

Garment Features

Garment features are described here using the definitions adopted in EN 14682:2014. Any feature which is not defined but has similar characteristics to those defined should be treated as though they are the defined feature. Caution is needed as certain countries apply different definitions as noted below.

Cord: Any cord, chain, ribbon, string or tape, made of any textile or non-textile material including elastic material.

Drawstring: Any cord, which passes through a channel, loop(s) or eyelet(s) or similar, to adjust the size of the opening, or part of the garment or to fasten the garment itself. The protruding length of the drawstring may increase



ANNEX II: GUIDE TO MECHANICAL SAFETY. CORDS, DRAWSTRINGS AND LOOPS

when closure is affected. For some garments, a drawstring may be a loop with a tightening device rather than a single length with two ends that may or may not be tied.

Note: For China only a cord passing through a fabric channel is recognised as a drawstring otherwise it is treated as a functional or decorative cord.

Functional cord: Cord, which is used to adjust the size of the opening, or part of the garment or to fasten the garment itself

Decorative cord: Any cord which is non-functional, with free end with or without embellishment such as toggle, pom-pom, feather or bead, which is not intended to be used to adjust the size of the garment opening or fasten the garment itself. Fringes are considered as a series of decorative cords. Free ends of fixed bows are considered as decorative cords.

Loop: Cord or narrow strip of fabric, which may be fixed or adjustable in length, where both ends are attached to the garment. (A simple bow forms 2 loops and 2 decorative cords).

Adjusting tab: Strip of textile or non-textile material not less than 2 cm in width intended to adjust the size of opening on a garment or for decoration, for example at the ankle or sleeve cuff.

Toggle (Bauble): Wooden, plastic, metal or otherwise composed piece attached to or present on, a drawstring, functional cord or decorative cord. Toggles may or may not be functional. A locking or adjusting device on a drawstring is a functional toggle.

Three dimensional embellishment: decorative item attached to a cord that is thicker and/or wider than the cord itself. Thin materials such as plastic sleeving (boot lace ends) which are not thicker than the cord itself are not considered as three dimensional embellishments.

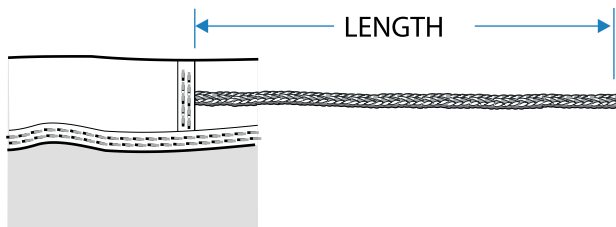
Belt (excluding tied belts): Strip of any material, with fastening mechanism such as buckle, worn around the chest or waist area used to hold up clothing or as decoration.

Tied belt or sash: Decorative or functional piece of any material of not less than 3 cm width tied round the chest or waist area of a garment. A tied belt or sash may or may not fully encircle the body. If the width is less than 3 cm, these are considered as functional cords or drawstrings.

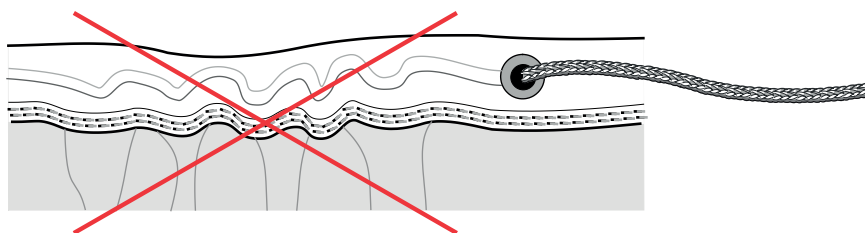
Measurements

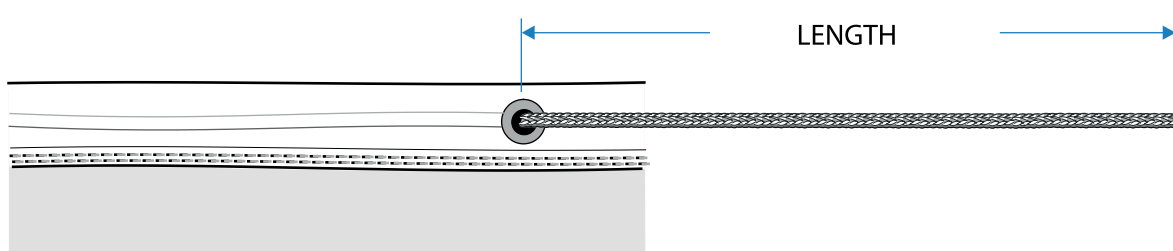
Many of the measurements specified are maximum or minimum lengths; garments should be designed and manufactured such that these limits are not exceeded in production garments.

In assessing compliance measurements should be taken with the cords or loops in their relaxed state:

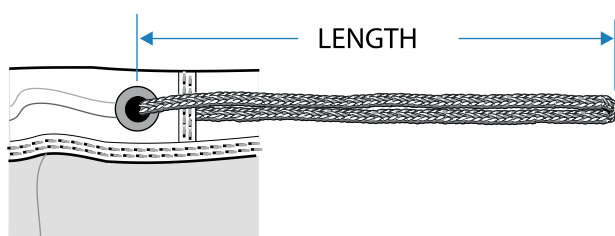
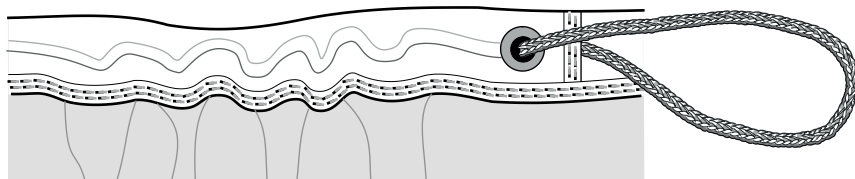


Drawstrings should be measured while they are flat in the channel:

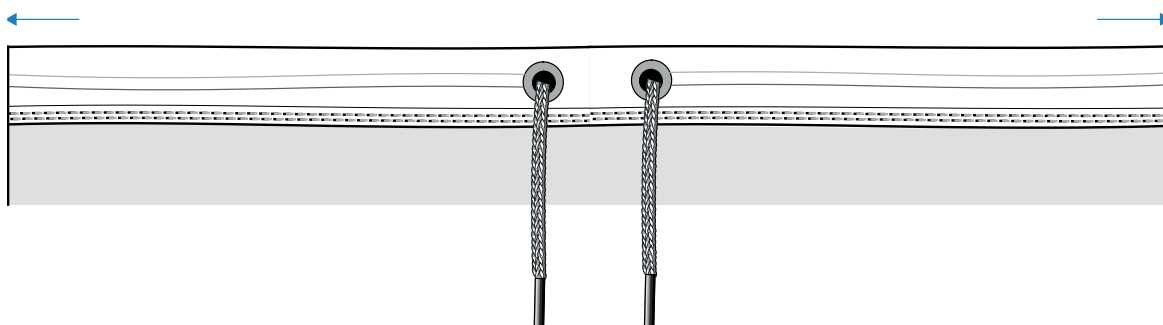
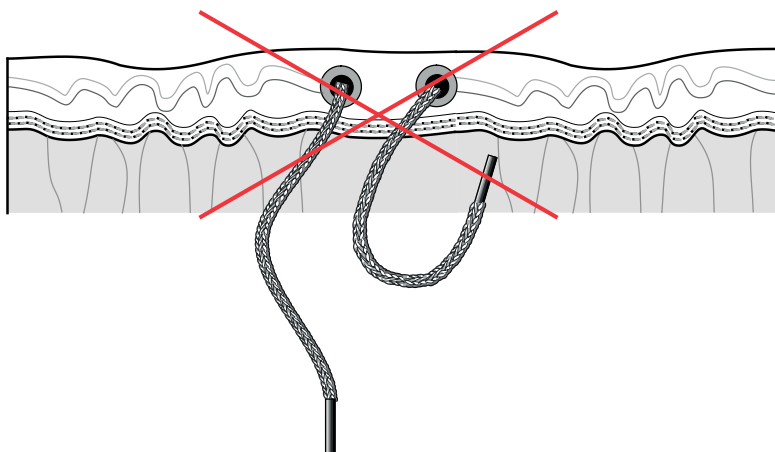




For cords with no free ends measure the circumference or measure the flattened length and multiply by two:



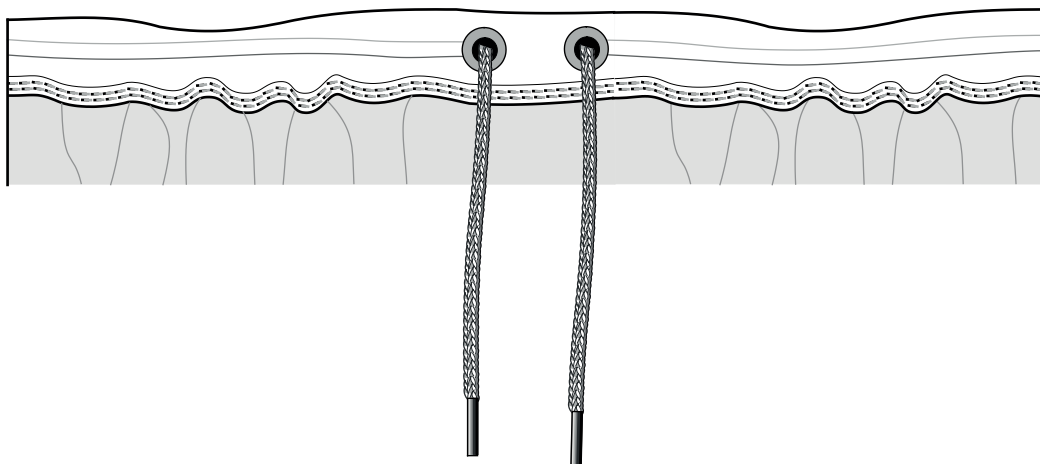
Where the measurement needs to be taken with the garment “open to its largest and laid flat”; any gathering or the effect of elastics must be lightly pulled out and held during the measurement while also ensuring the drawstring remains flat in the channel.



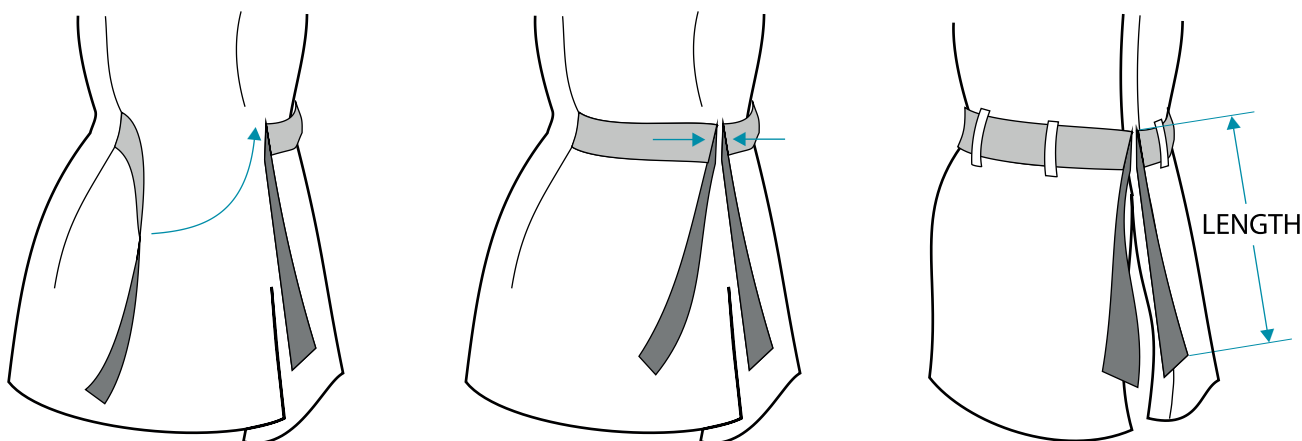


ANNEX II: GUIDE TO MECHANICAL SAFETY. CORDS, DRAWSTRINGS AND LOOPS

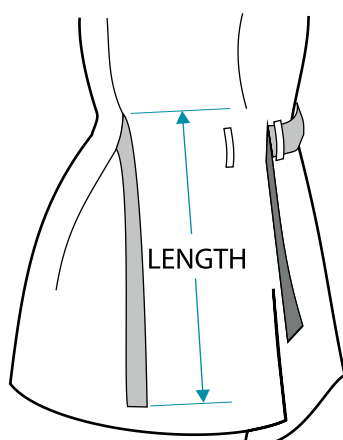
Where the measurement needs to be taken with the garment “in its relaxed natural state”; drawstrings must be pulled to be as flat as possible in the channel without adjusting the size of the garment and the garment laid flat on a table neither extended nor contracted. Any gathering or the effect of elasticsation must remain while the measurement is taken.



Sashes and tied belts should be measured from the point at which they will be tied.



Where a sash or tied belt is not fixed to the garment the free ends must first be adjusted to be equal in length. Where fixed to the garment if the ends are of different lengths then both must be measured.



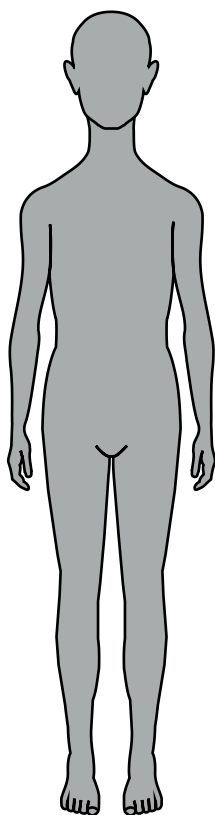
Note: For China Only

For a sash or tied belt attached to the garment the length must be measured from the fixed point.

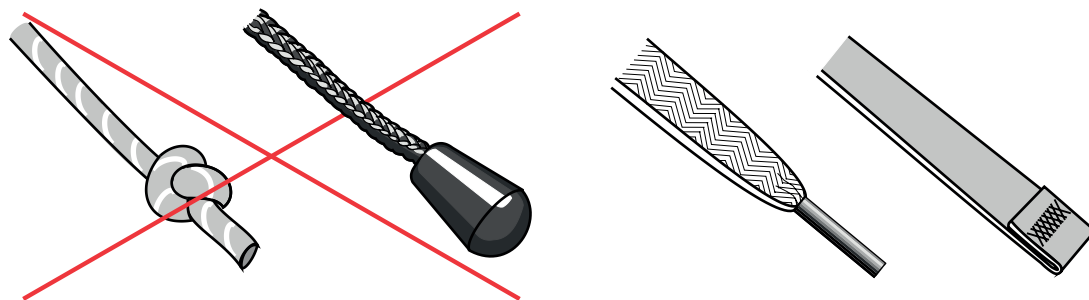


Specifications

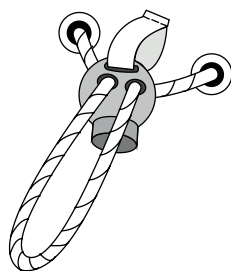
General requirements



Drawstrings, functional cords and the sashes must not have knots (or three dimensional embellishments) along their length or at the ends and the free ends must be protected to avoid fraying (for example thermal bonding or stitched). The hem or fold of the end is permitted as long as it does not create a risk of entanglement.



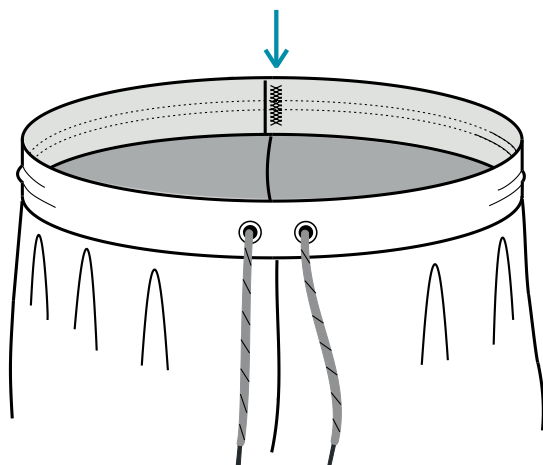
Toggles may only be used in drawstrings that do not have loose ends.



Decorative cords may carry three dimensional embellishments but are only permitted in certain areas as indicated in the following sections.

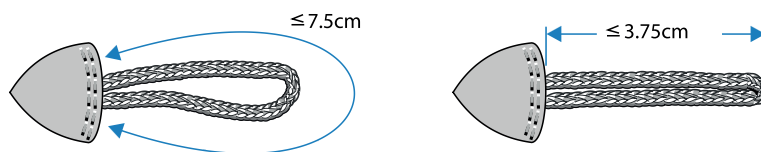
Note: For China, three dimensional embellishments are not permitted anywhere on decorative cords.

Where drawstrings are permitted, the cords must be fastened, using a stitch in at least one point equidistant from the exit points.

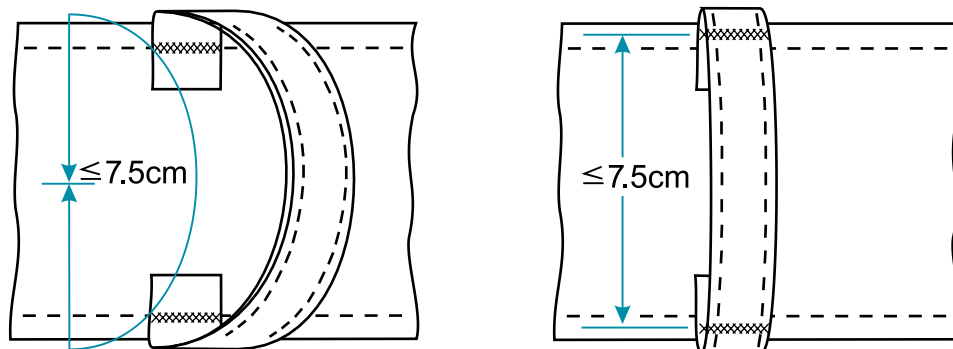




Fixed loops that protrude from the garment, such as those used to fasten a duffle coat, must have a circumference that does not exceed 75 mm.



Flat loops that do not stick out from the garment such as the loops of straps and belt loops, must have a length measured between their fixing points to the garment less than or equal to 75 mm.



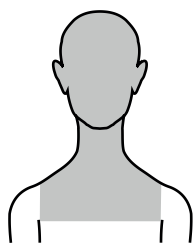
Loops inside the garment such as hanger loops are permitted provided they do not protrude from the garment in wear and do not present a hazard.

Zip pullers, including any embellishments, must have a length less than or equal to 75 mm measured from the slider.

Note: For China, zip pullers must have a length less than or equal to 40 mm measured from the slider.

Adjusting tabs should be designed not to have any item on the free end which may present an entrapment hazard.

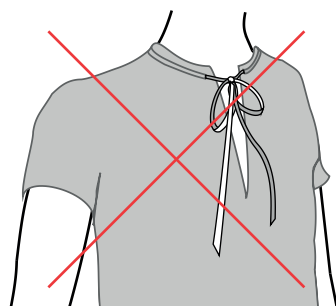
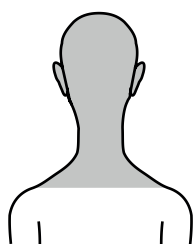
Head, Neck and Upper Chest Area.



In the head, neck and upper chest area specifications differ according to the age of the wearer.

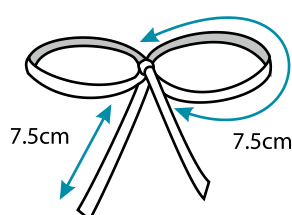
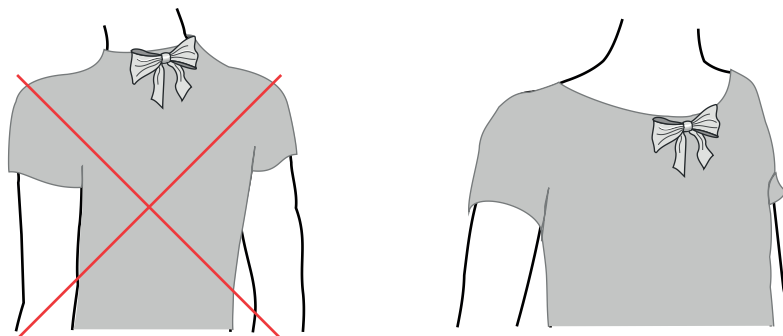
Young children's garments:

Drawstrings or functional cords are not permitted. [3.2.1]



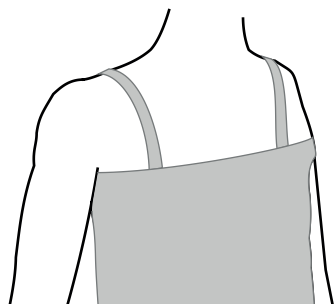


Decorative cords (including for example ribbons and bows) are permitted provided they are NOT on the head or at the back of the neck, are not made of elastic material, have no knots, toggles or three dimensional embellishments, have free ends not longer than 75mm and cannot be tied across the throat. [3.2.2-3.2.3]

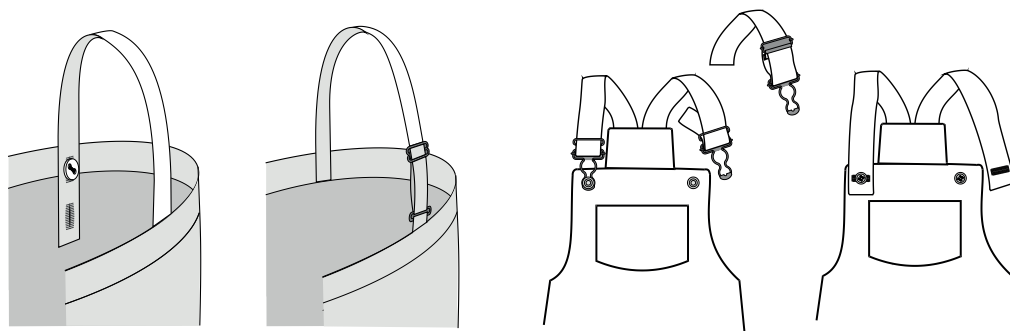


Note: For China, decorative cords are not permitted and bows must be stitched down to leave no free ends or loops.

Shoulder straps should be made of a continuous material or cords should be fixed in the front and back part of the garment and may be elasticated.



Adjustable straps are permitted provided there will be no free ends external to the garment in wear. Adjustment mechanisms such as ring and slider are permitted providing the strap and any loop formed lies flat against the body in wear. [3.2.5]



Note: For China shoulder straps must either be permanently attached or attached by buttons (other attachments such as clips on dungarees are not permitted) with the free end on the inside of the garment.



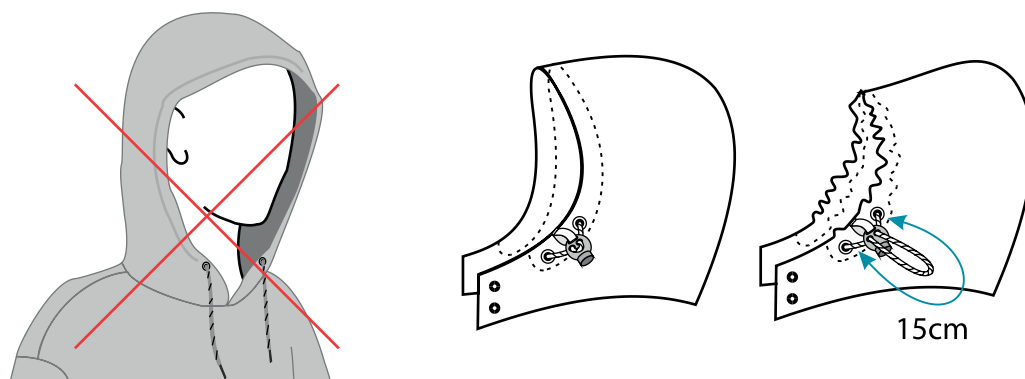
ANNEX II: GUIDE TO MECHANICAL SAFETY. CORDS, DRAWSTRINGS AND LOOPS

Decorative cords fixed to the straps must not have loose ends that are longer than 75mm and any loops must not have a circumference larger than 75mm.



Older children and young person's garments.

Drawstrings (including those made of elastic material) are permitted but must not have loose ends. [3.3.1] When the garment is opened as far as possible and laid flat, no loop should protrude. When the opening is at the minimum, that is, that which corresponds to the size for which it is intended to be adjusted, the maximum circumference of the loop must not exceed 150 mm.

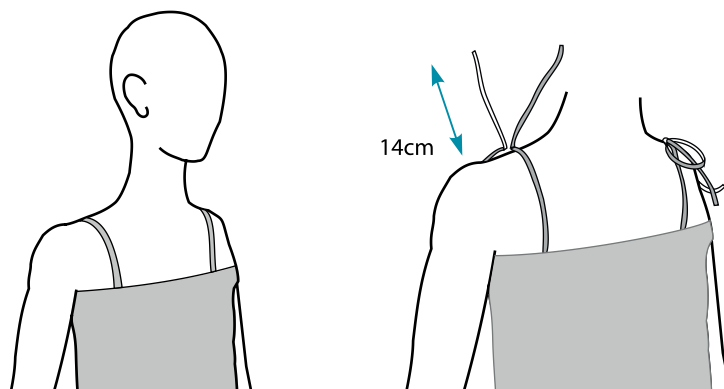


Decorative cords must not have a length over 75 mm including any embellishment or attached element, such as, for example, a bauble; and must not be fabricated with elastic material. [3.3.3]

Functional cords must not have a length over 75 mm on each end. Functional cords should not be fabricated with elastic material. [3.3.2]

Note: For China, functional cords with free ends are not permitted.

Shoulder straps are permitted as long as the loose ends are not over 140 mm, measured from the point at which they are tied and fixed loops must not have a circumference over 75 mm. [3.3.5]

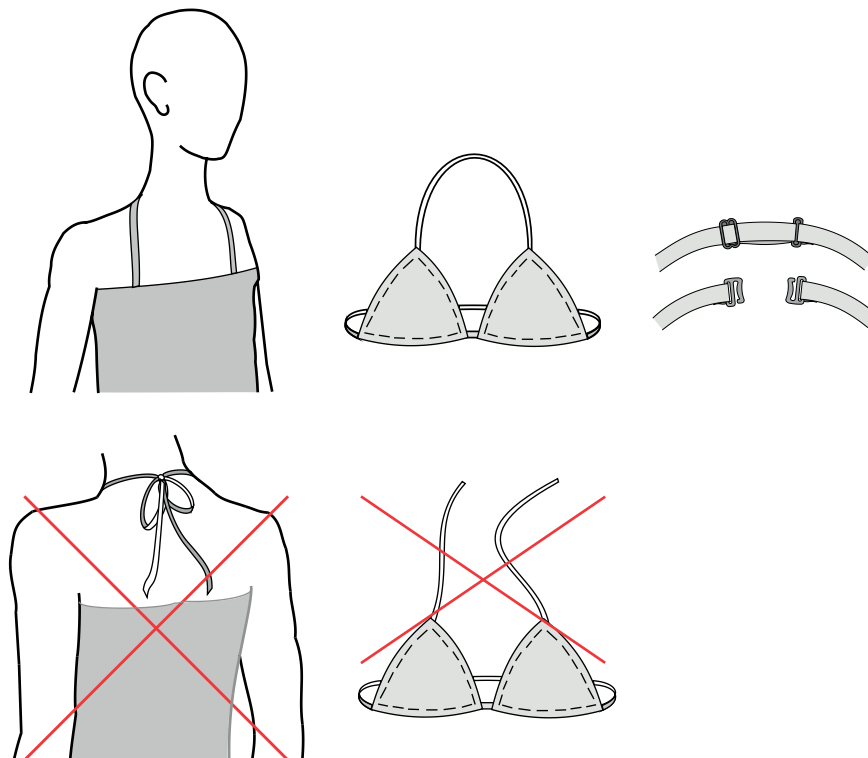




Adjustable shoulder straps are permitted provided there will be no free ends external to the garment in wear. Adjustment mechanisms such as ring and slider are permitted providing the strap and any loop formed lies flat against the body in wear.

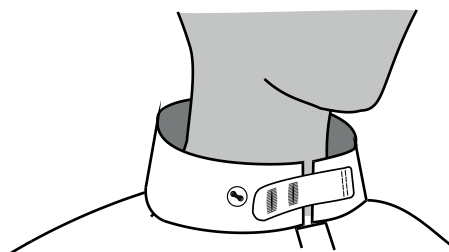
Both age groups.

Garments with cords around the neck (halter-neck style) must be designed without loose ends in the neck and throat area. [3.2.6] Elasticated or adjustable straps are permitted provided there will be no free ends external to the garment in wear. Adjustment mechanisms such as ring and slider are permitted providing the strap and any loop formed lies flat against the body in wear.



Note: For China, halter necks are not permitted for young children.

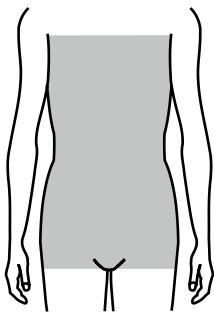
Adjusting tabs must not have a length over 75 mm or have any item (button, buckle) on the free end which may present an entrapment hazard. [3.3.4]



Note: China considers adjusting tabs to be functional cords so they are not permitted in the head and neck area.

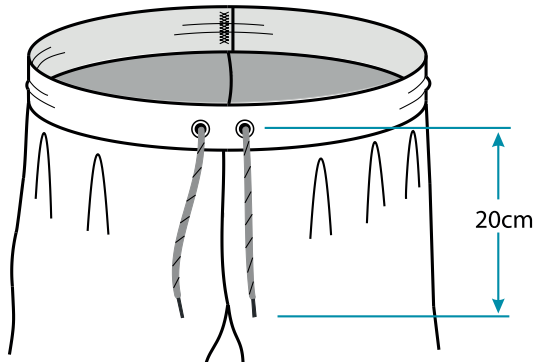


Chest and Waist Area



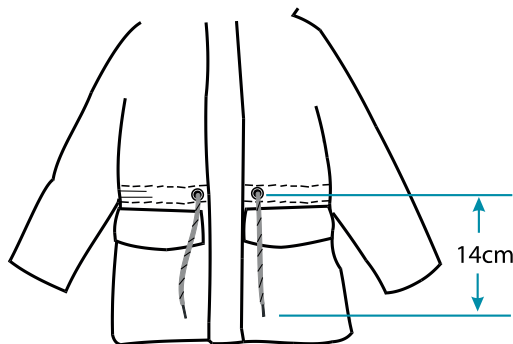
Drawstring and functional cord specifications for the Chest and Waist area differ between garments that are or not supported at the shoulder by straps, braces or sleeves. Some garments are typically worn from the waist down and examples include pants, trousers, shorts, skirts, briefs, bikini bottoms; other garments which are supported in this way include per example shirts, coats, dresses or dungarees.

Where garments are not supported at the shoulder: Free ends of functional cords and drawstrings must be no longer than 200mm when measured with the garment in a “relaxed natural state”. [3.4.1 a and c]

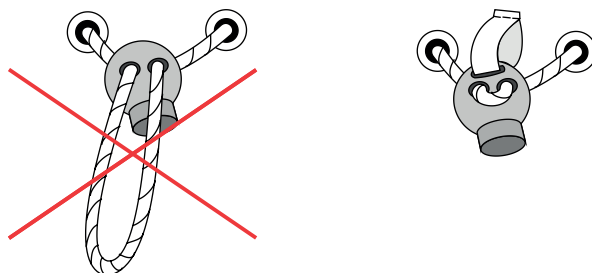


Note: In China, maximum permitted length for free end of functional cords is 140 mm when the garment is open to its largest and laid flat.

For garments that are supported at the shoulder: Free ends of functional cords and drawstrings must be no longer than 140mm when measured with the garment “open to its largest and laid flat”. [3.4.2a and c]



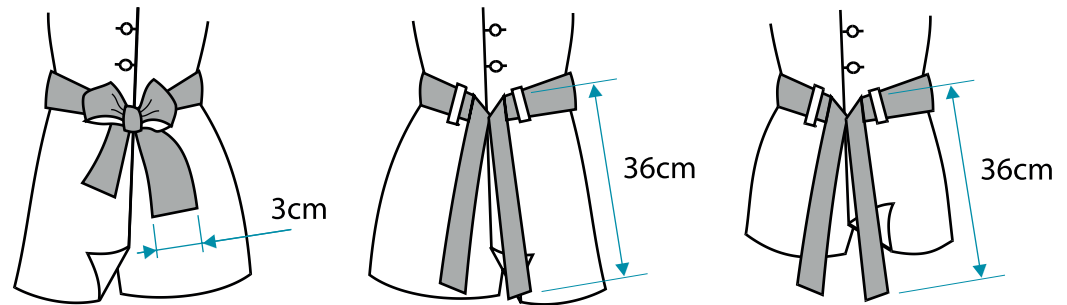
In both cases, where drawstrings have no free ends, there must be no loop remaining when the garment is “open to its largest and laid flat” and if an adjusting device (toggle) is used it must be secured to the garment. [3.4.1b and 3.4.2b]





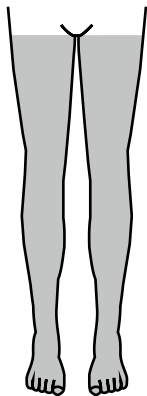
Decorative cords and tab fasteners may have a maximum length of 140 mm including any adornment on the decorative cords. [3.4.1d, 3.4.2d and 3.4.3]

Sashes designed to be tied in the front or at the side of the garment are permitted as long as when they are untied they do not exceed 360 mm, measured from the tying point [3.4.6].

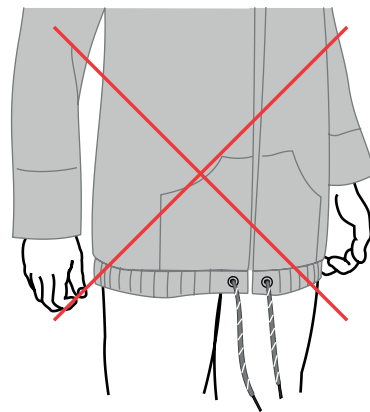


Note: In China if a sash is fixed to the garment the 360mm is measured from the attachment point and for young children the free ends must not hang below the hem of the garment.

Below Crotch Area



No part of a drawstring, decorative or functional cord (and including any embellishment) on the lower edge of garments in which the lower edge is situated below the hips, may hang below the lower edge of the garment. This requirement is also applied to garments where the position of the lower edge is unclear. [3.5.1]

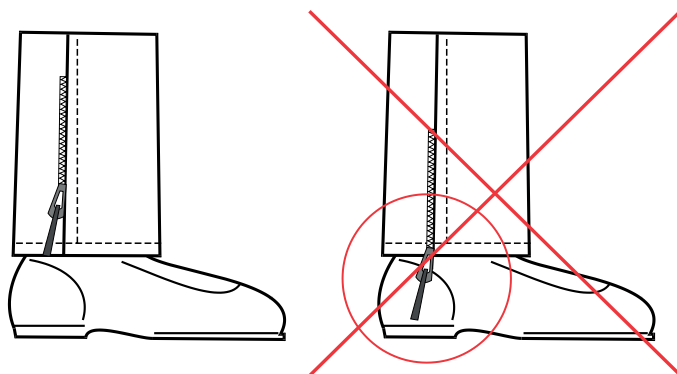


When they are on the outside of the clothing, cords or drawstrings must lie flat against the garment when it is adjusted or fastened. [3.5.2]

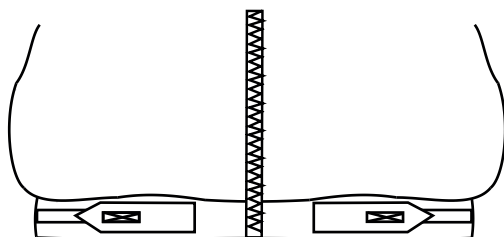
Drawstrings, functional or decorative cords at the lower edge of coats, pants or skirts designed to end at the ankle are acceptable provided they remain totally inside the garment during wear (functional stirrups are acceptable on the lower edge of pants). [3.5.3]



Zip pullers, must not extend beyond the lowest edge of the clothing designed to end at the ankle:

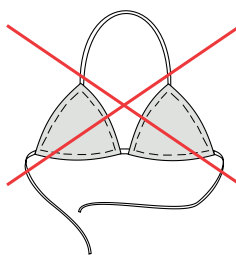
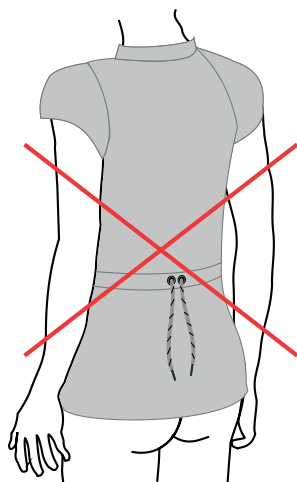
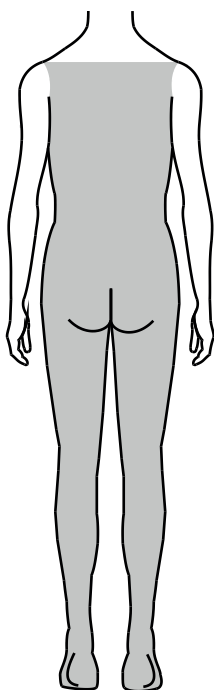


Adjusting tabs are acceptable if their length is no more than 140 mm and, in addition, they must not hang below the garment. [3.5.4]



Back Area

Drawstrings, or functional cords that protrude from the back part of the garment or that are fastened to the back are not permitted. [3.6.1]



Decorative cords are permitted only if they have no knots, toggle, bauble or three dimensional embellishment and are not more than 75mm in length. [3.6.2]

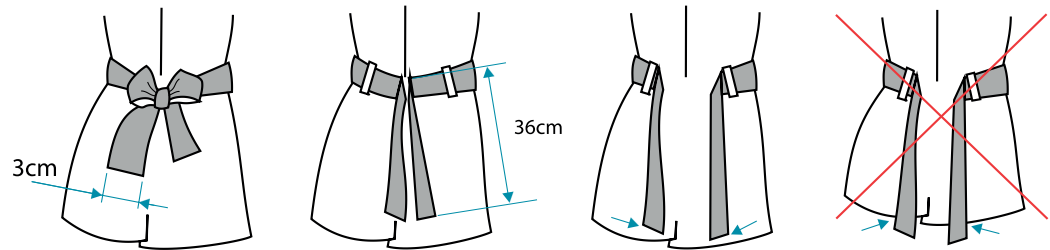


Note: For China, decorative cords are not permitted in the back area; hence for example fringes are not allowed.

Sash and tied belt specifications differ according to the age of the wearer:

Young children's garments.

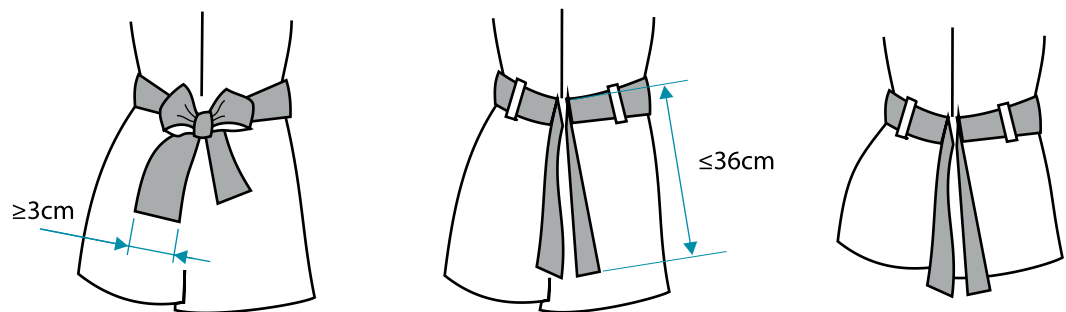
Sashes designed to be tied in the back of the garments are permitted, as long as when they are untied they do not exceed 360 mm, measured from the tying point and, in addition, when they are untied and loose they must not hang below the hem of the garment [3.4.4]



Note: In China if a sash is fixed to the garment the 360mm is measured from the attachment point.

Older children and young person's garments.

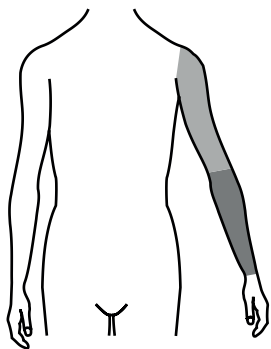
Sashes designed to be tied in the back of the garments are permitted as long as when they are untied they do not exceed 360 mm, measured from the tying point. [3.4.5]



Note: In China if a sash is fixed to the garment the 360mm is measured from the attachment point.



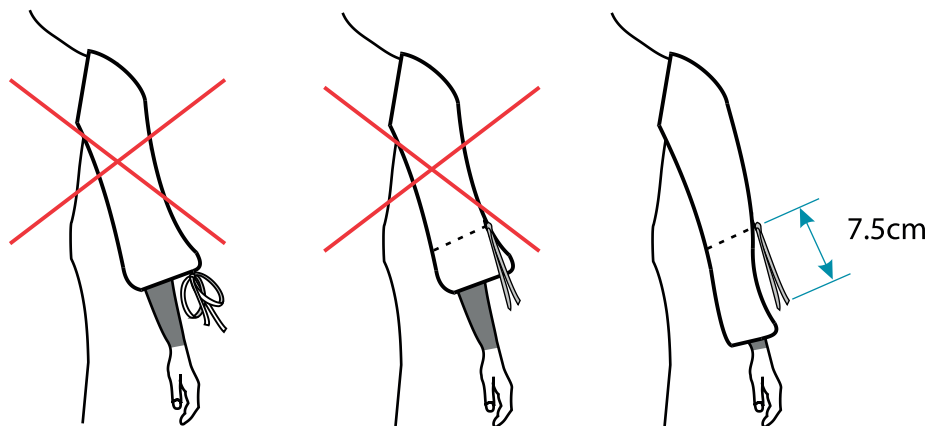
Arms (Sleeves) Area



Specifications for drawstrings, decorative and functional cords in the arms (sleeves) area differ according to where the sleeve ends.

For sleeves that end below the elbow:

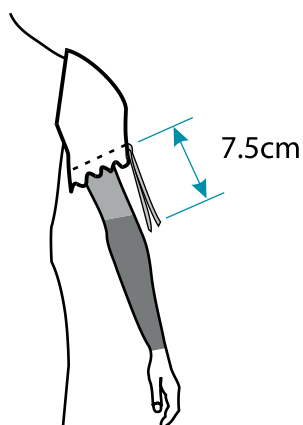
- In wear and when fastened, any drawstrings, functional and decorative cords on the lower edge of the sleeve must be completely inside the garment. [3.7.1]
- Drawstrings, functional and decorative cords positioned below the elbow must not be longer than 75mm and must not hang below the lower edge of the sleeve. [3.7.2]



For sleeves designed to end at or above the elbow (short-sleeved), requirements also differ according to the age of the wearer.

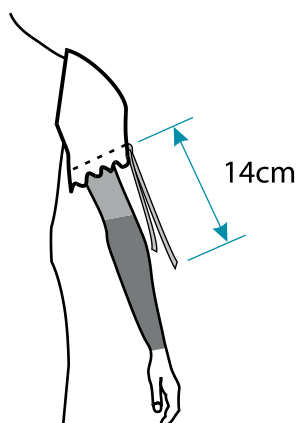
Young children's garments:

Drawstrings, functional and decorative cords are permitted if the maximum length that protrudes is not more than 75 mm, measured when the sleeve is open to its largest and laid flat. [3.7.3]

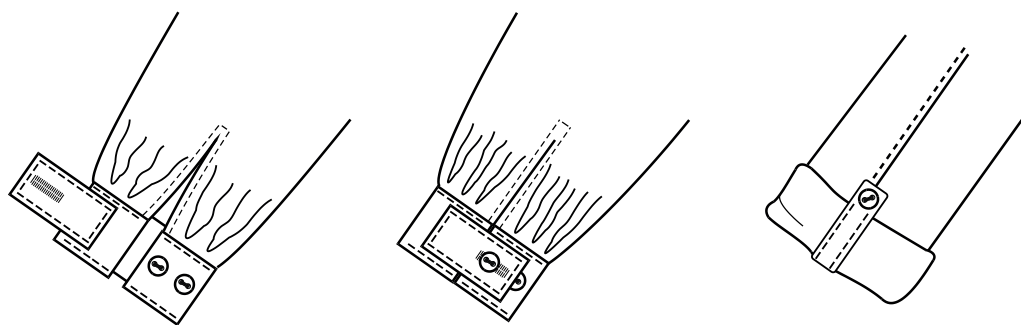


Older children and young person's garments:

Drawstrings, functional and decorative cords are permitted if their maximum length is not over 140 mm, measured when it is open to its largest and laid flat. [3.7.3]



Adjusting tabs are permitted on all sleeves as long as they do not exceed 100 mm in length and, in addition, when they are open they do not extend below the lower end of the sleeve. [3.7.5]



Other parts of garments

In other areas of the garment not mentioned above, drawstrings or functional and decorative cords must not protrude more than 140 mm, when the garment is completely open (maximum). [3.8]

ANNEX III: GUIDE TO MECHANICAL SAFETY. COMPONENTS, MATERIALS AND CONSTRUCTION



ANNEX III: GUIDE TO MECHANICAL SAFETY. COMPONENTS, MATERIALS AND CONSTRUCTION

Introduction

Components and manufacturing processes present, or can introduce, hazards such as choking, aspiration or ingestion, cuts and piercing etc in garments and related products. These requirements and recommendations are designed to minimise these hazards by specifying performance criteria which must be achieved under testing, together with guidance on the processes used in production and through the supply chain.

The requirements are mandatory for all garments intended by design, production or selling route to be worn by babies and infants; certain aspects are also required for garments intended to be worn by children and young people up to 14 years of age.

Adult wearers are considered to be able to recognise many of the hazards or their behaviours do not expose them to the risks in the same way as for minors. Hence most of the hazards are not regulated in adult's products and only have quality implications. Requirements are therefore related to wearer's age and are applied to garments according to the intended wearer's age and height:

Garments for babies: are those for children aged from birth up to 12 months and those intended for children of height 80cm or less.

Garments for infants: are those for children aged from 12 months up to 36 months and those intended for children of whose is height between 80cm up to 98cm.

Garments for children and young person: are those for children aged from 36 months up to 14 years and those intended for all boys of height greater than 98cm up to 182 cm and girls of height greater than 98cm up to 176cm.

Where inconsistencies with these definitions occur in certain regulatory regions or standards, the more onerous performance requirements have been adopted to maintain compliance.

Recommendations on how to achieve compliance are derived from CEN/TR 16792:2014 "Safety of children's clothing - Recommendations for the design and manufacture of children's clothing - Mechanical safety". These are consistent with BS 7907:2007 which remains current. Other standards are cited in the text where they apply specific requirements or as examples of wider adoption.

Components

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

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

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

Requirements

Small Parts

A **small part** is defined in terms of the ISO 8124 small parts cylinder which simulates the fully expanded throat of a child under 3 years old. If any object can fit completely into the cylinder without compressing and in any orientation, it is defined as a "**Small Part**". Small parts present hazards associated with choking, aspiration, ingestion (swallowing) etc, and also insertion into eyes, nose or ears. The consequences of these hazards are generally



serious for babies and infants (ie from birth to 36months). For this reason small parts are regulated in a wide range of products for this age group.

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

The tests to determine if a part constitutes a small part given in TR 16792:2014, UNE 40902, EN71-1 and 16 CFR 1501 are equivalent. See Small Parts Test Method (reference).

Removable Parts

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

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

Larger removable parts in babies’ and infants’ products must be subjected to torque and tensile testing to establish their likely durability and as a result of these tests must produce no parts that are themselves **small parts**, have sharp edges or sharp points (see below) [UNE 40902].

Attached Components

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

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

Where items are very small ($\leq 3\text{mm}$) they are unlikely to be gripped and pulled off by an infant but nonetheless can become detached in wear, cleaning etc and remain accessible as small parts. For this reason the approach in CEN/TR 16792 applies a durability wash test to these and other non-grippable items.

Note: Chinese requirements prohibit attached components $\leq 3\text{ mm}$ in infants’ textile products.

Sewn on components - buttons, sequins, small textile components etc.

The security of attachment of sewn on components can be easily compromised by the use of inappropriate stitching methods and for this reason CEN/TR16792 recommends the use of specific types of lockstitch for babies and infants products. Adoption of these practices has been found to result in product that reliably passes the tests.

Generally buttons of all types need to pass the tension and torque tests.

Sequins and small textile components are considered not to be grippable during testing without incurring damage. These components should be assessed for security of attachment in accordance with CEN/TR16792 Annex C.

Mechanically attached components - rivets, tack buttons, press fasteners, snaps.

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

- the process followed during attachment,



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

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

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

Adhesive and Heat fused components - glitter.

The security of attachment of these items can be adversely affected by the following factors:

- textured or uneven fabric surfaces,
- highly extensible fabrics,
- certain fabric finishes,
- uneven surfaces caused by garment construction.

These components will mostly be non-grippable and should be assessed for security of attachment in accordance with CEN/TR 16792 Annex C. Individual components of a grippable size need to pass the tension and torque tests.

Sharp Points and Sharp edges

No parts of, or components attached to garments intended for **babies, infants or children and young persons** are permitted to have sharp points or sharp edges.

Note: GB 31701:2015 makes this a mandatory requirement for all garments for children up to 14 years of age.

Tests for the penetration of a sharp point [UNE 40902 Sharp points test] and the sharpness of an edge [UNE 40902 Sharp Edges Test] are consistent across all standards which apply a test (and equivalent tests are defined in EN71-1).

CEN/TR 16792 does not apply a specific test but highlights the cutting and piercing hazards presented by sharp edges, points, burs, etc. and goes further to consider irritation and abrasion. These factors should be assessed by inspection. The sharpness and roughness of accessible edges, points, corners, seams or surfaces should be assessed, and are not acceptable if they have the potential to abrade or irritate the skin.

Foreign objects

Items that should not be present in the product or packaging, can also present hazards. For babies and infants product great care must be exercised to avoid objects being introduced during production and, packaging processes. Common problems involve needles, broken needle parts, pins, loose components etc.

Inditex's Metal Detection Policy which is a mandatory requirement for suppliers is intended to ensure that no metal objects are present in finished product.

Other objects such as stones from stone washing also present hazards in babies and infants products and procedures should be adopted to prevent their occurrence.

Notes on specific components

Slide Fasteners: Zips are generally made up of a significant number of small parts. Assurance of the compliance of zip-fasteners with the requirements is best achieved through the use only of items which conform with "EN 16732:2015 Slide fasteners (zips) — Specification". Fasteners conforming to the performance code appropriate to the type of clothing should be used. Code A (ultra-light) should not be used in babies and infants garments. Slide



fasteners should meet the requirements of Table 1 class C and Table 2 (Note: Table 2 ensures that the zip puller meets the UNE 40902 torque requirement).

Slide fasteners in the fly of trousers to be worn by boys up to 5 years of age should be avoided and a guard included in garments for older boys to protection against accidental entrapment. [NBR 16365]

Touch and Close Fasteners: To avoid the possibility of skin abrasion it is recommended that the hook component should be directed away from the child's body and that the pieces are die cut with rounded corners to minimize the risk of scratching. [NBR 16365]

Monofilament yarn: Should not be used in children's garments/products that would be in contact with their skin due to its tendency to induce skin irritation. [NBR 16365]

Embroidery and appliqué: The possibility that a baby's or infant's skin can be irritated or abraded should be avoided by consideration of the positioning of such decoration in respect of the skin. The use of interlining or panel linings will avoid the possibility of irritation from the reverse side.

ANNEX IV: METAL DETECTION POLICY



ANNEX IV: METAL DETECTION POLICY

1. Definition and Scope

The Metal Detection Policy (hereinafter, the Policy) is a mandatory policy designed by Inditex to ensure that all the products supplied by any external manufacturers and suppliers and their subcontractors to Inditex do not contain any needle, pin, staple or any metallic item (from any stage of the production process) that may cause any injury if inadvertently left in the product.

The Policy has been designed to protect not only the health and the safety of Inditex's consumers, its reputation as well as the external suppliers and manufacturers and their subcontractors, but also the health and safety of the workforce involved in any stage of the Inditex's supply chain.

The Policy implies that:

- It is a mandatory requirement since its approval and its non-compliance or violation can therefore not be tolerated and will lead to penalties starting from form fines until cancellation of all orders.
- When external manufacturers and suppliers and their subcontractors are not the manufacturer, they must ensure that any products supplied to Inditex will be in compliance with the Policy.
- All Inditex apparel items should be 100% ferrous free.

2. Commitments of the External Suppliers and Manufacturers

External manufacturers and suppliers and their subcontractors are committed:

- To manufacture their products using packing material, trims and accessories containing metallic components be made only of non-ferrous metal. Consequently, all metal accessories should pass the ferrous detection check with maximum diameter 1.00 mm from any direction.
- To check all incoming trims and accessories at least on a random basis in order to identify eventual metallic contamination at an early stage. Consequently, Inditex's external manufactures and suppliers top management will be immediately informed of any trims or accessories identified after the ferrous detection process.
- To pass a metal detection test with maximum diameter 1.00mm from any direction before carrying out the final inspection in all products manufactured to Inditex.
- To ensure that the metal detection machine is maintained properly and set according to the standard.

At manufacturing level:

- To make all machine workers/operators aware of the relevance and importance of the Policy and its implementation.
- To nominate fully responsible trained workers to keep the control of all new machine needles for embroidery, hosiery, knitting and sewing, mainly.
- To ensure that all sewing needles in the possession of the machine workers/operators are controlled at any time during the manufacturing process.
- To nominate fully responsible trained workers to monitor the adequate implementation of the Policy and deal with contaminated products.



Action to be taken with contaminated products:

- To destruct the product affected by it and to eliminate any possibility of its future use.
- To record product contaminated in a formal file.
- To keep the mentioned files available for inspections anytime when either Inditex or its external Quality Control and health and safety team require.
- To check again new samples of previous contaminated products to ensure their conformity with the Policy and its requirements once the contaminated product situation has been corrected.

3. Commitment of the Packaging, Trim and Accessory Suppliers

- The packaging, trims and accessory external suppliers must ensure that all packing material, trims and accessories are metal ferrous free and have successfully passed a metal detection process prior to the beginning of the manufacturing process.
- This process must to be recorded and all its documents must be available upon request from either Inditex or its external quality control and health and safety team.



METAL DETECTING PRODUCTION GUIDELINE

1. Training

1.1. General

External manufacturers and suppliers and their subcontractors are responsible for conducting and documenting regular quality control and health and safety audits at production units to ensure the compliance with this Policy.

1.2. Alcance

- External manufacturers and suppliers and their subcontractors should nominate a fully responsible trained worker/operator to conduct quality control and health and safety audits on a regular basis.
- External manufacturers and suppliers and their subcontractors should nominate a fully responsible trained worker/operator to conduct needle distribution at factory level.
- External manufacturers and suppliers and their subcontractors should train all their workers and operators on proper needle control and the contents of this Policy. The mentioned training program should include the following topics:
 - Machine cleaning.
 - Needle exchange.
 - Needle breakage.
 - Swift tag gun needles used for attaching hangtags.
- External manufacturers and suppliers should keep a record of the mentioned training courses given to their workers/operators.

2. Commitments

- External manufacturers and suppliers and their subcontractors should control the use of staples, metal paper clips and pins, mainly.
- External manufacturers and suppliers and their subcontractors should train fully responsible specialists/mechanics to conduct and document scheduled needle changes. Additionally, the quantity of needles should be verified and recorded each time.
- External manufacturers and suppliers and their subcontractors should have metal disposal boxes available on each floor/line to keep, control and isolate safety metal parts found or exchanged needles.
- External manufacturers and suppliers and their subcontractors should control:
 - Uncontrolled spare needles.
 - Uncontrolled metal tools from a tool board.
 - Unfixed scissors, trimmers and seam openers from the machine.
 - Unused tools to be located on the tool board at all times.



3. Scope

3.1. Cutting Area

- Markers must be fused onto fabric in order to avoid the use of pins or stuck with tape onto the upper layer.
- Metal clamps can be used but the number of clamps per cutting table must be checked after every shift.
- The quantity of the pins must be recorded when pins are used for striped and checked fabric.
- Supplier of above mentioned fabrics/padding must have a metal detection process.

3.2. Embroidery Area

- This Area must follow a strict needle control policy.
- All panels with embroideries must pass metal detection before they go into sewing line (either done by external subcontractor or manufacturer itself)
- Daily broken or damaged needle report must be kept.

3.3. Sewing Area

3.3.1. Needle Replacement Procedure

- New needles must be stored in a locked place operated by a nominated fully responsible trained worker/operator.
- No other needles except the sewing machine needles should be allowed at the machine.
- New needles must only be handed out to the operators by the nominated fully responsible trained worker/operator.
- New needles must only be handed out in exchange of damage needle or all the parts of the broken or damaged needles.
- All broken ore damaged needles parts must be taped on to the “Broken or Damaged Needle Report”.
- Machine drawers must be checked regularly by the line supervisor and machine tools must be kept in a secure place and accounted for at the end of each working day.
- Mechanics must not leave any needles on the machine.
- Screwdrivers and machine tools must be kept in a secure place and be accounted for at the end of each working day.

3.3.2. Broken or damaged Needle/ Part Not Found

In case not all parts of the broken or damaged needle were to be found the following procedure needs to be implemented:

- Request of thorough search of garment panels and work area. If not all parts of the needle found, the operator must inform the supervisor.



- Carry on a supervisor control of all garment panel within the area of 2.5 meters around the machine in a transparent plastic bag and check for broken or damaged needle through the metal detector. If the needle parts cannot be found during this checking, this parcel should be checked by the metal detector one more time.
- If the broken or damaged part of the needle can not be found after 2 times of needle detection checking the production should only continue by formal authorization of the Manager.
- To document all actions taken in a proper file.

3.3.3. “Broken or damaged Needle Report”

The “Broken or damaged Needle Report” is a spreadsheet which includes the following columns:

Section	MC type	Needle size	Seam operation	Style/order	Action

- An individual sheet should be issued for each needle type to easily identify incomplete broken or damaged needles.
- The column for the needles parts should be of the same width as the length of the needle.
- The broken or damaged needles on one page should match the pacing unit of the needed for easy book-keeping.
- Old broken or damaged needle reports must be properly disposed in order to prevent any person from harm.
- The “Broken or Damaged Needle Report” must be analyzed in a regular basis to gain important information which can prevent problems. This issue should mainly include:
 1. Type of fabric, where incidence of needle breakage is high.
 2. Kind of machine/operation where incidence of needle breakage is high.
 3. Size of needle with high incident of breakage.
 4. Does the needle always break into several pieces?
 5. What style/product has a high incidence of needle breakage?
- The “Broken or Damaged Needle Reports” must be kept for a period of at least five years.

3.3.4. Packing Area (Metal Detection Area)

- The metal detection process must be carried on in an isolated area of the warehouse with restricted access.
- The area must be free of any metal contamination or high power supply cable that might affect the sensitivity of testing.
- All packed and sealed garments must be tested by the metal detector individually.
- Records of the metal detection process must be kept on a record sheet.
- All garments which have passed the metal detection process must be immediately packed in the delivery carton. The carton must be sealed and signed with a sticker stating “metal free”.
- Delivery cartons must not be stapled and need to be free of metal.



4. Tools

4.1. Metal Detector

- Only nominated fully responsible trained workers will be allowed to handle and operate the metal detectors.
- Trained workers operating the metal detectors should be “metal free” (i.e. watch and ring, mainly).
- Metal detectors must be calibrated at least once a year by the metal detectors engineer. This process should be documented.
- Metal detectors need to follow the standard ferrous diameter 1.0 mm. and all of them must react against with the mentioned standard at the weakest sensitive points.
- External manufacturers and suppliers must ensure that the sensitivity points of the metal detectors in use are checked and calibrated at least once a month. This process must be documented.
- Metal detectors must be calibrated to react at these three points against the standard of ferrous diameter 1.0 mm. This process should be documented. Adjustments to be done if necessary.
- External suppliers and manufacturers must detect every garment in horizontal and vertical direction with the metal detector. Different ways of metal detector machine set ups are possible to ensure that the conveyer type is used. If garment fails to pass the metal detection process it must be kept in a separate box until further checking. This box must be locked and have a slit to deposit the contaminated garment.
- Lastly, if an unreasonable amount of garments fails the metal detection process the factory must locate the source of the detection and inform the respective persons immediately.

4.2. Documentation

- External Manufacturer and Suppliers and their Subcontractors must document the metal detection process on “Factory Metal Detecting Report” (see next page)
- Records need to be kept at least 5 years and need to be available upon request by either Inditex or its external quality control and health and safety team.
- “Broken or damaged Needle Report” must be maintained by fully responsible trained workers/operators.
- Accurate records of needle issued to production lines must be kept and checked regularly (needle stock control sheet) by fully responsible trained worker/operator.

4.3. Compliance Assessment

- Lastly, Inditex will assign an external quality health and safety team to audit each factory based on a regular basis.



Example of two-way needle detection by two sets of single gate needle detector. Source: SGS Internacional

FACTORY METAL DETECTING REPORT

Vendor Name:		Audit Date:	
Factory Name:		Factory Location:	
Style #:		Season:	
Color #:		PO Qty.:	
PO # :		Shipped Qty.:	
Info			
Detector Type:	Conveyor	Table Top	Hand Held
Nombre de la marca:			
Modelo n°:			
Intensivamente:			
Observaciones:			
Test passed	Yes O	No O	
We, here confirm that we have inspected the above mentioned style / quantity by metal detector and have sorted out any metal contaminated product from shipment.			
Factory's Representative:		Factory's QA Manager:	
Signature:		Signature:	
Date:		Date:	

ANNEX V: COMMITMENT TO COMPLY WITH INDITEX GROUP'S PRODUCT SAFETY STANDARD SAFE TO WEAR



ANNEX V: COMMITMENT TO COMPLY WITH INDITEX GROUP'S PRODUCT SAFETY STANDARD SAFE TO WEAR

I hereby confirm that:

- 1) We have received the safe to wear (hereinafter, STW) product health standard, we have read it and thoroughly understand its implications.
- 2) We acknowledge that compliance with STW is a contractual obligation and undertake, accordingly, to meet the STW requirements in all orders involving production, marketing or distribution placed by any of the formats of the Inditex Group.
- 3) We undertake to disclose and formally demand STW implications to the whole production line.
- 4) The Inditex Group:
 - Reserves the right to check: i) compliance with STW regarding any goods supplied, by any method, at any time, and/or at any stage of the production, marketing or distribution processes, and ii) the appropriate disclosure of STW.
 - Reserves the right to cancel any order for any goods where a non-compliance with STW regarding any test and/or inspection has been established.
 - Reserves the right to return any orders already delivered where a non-compliance with STW regarding any test and/or inspection has been established.
 - Reserves the right to cancel or destroy, or to order destruction of the goods subject to the cancelled order, subject to the fact that the cancellation of the relevant order shall entail the non-existence of the obligation to pay any sum whatsoever for the goods failing to comply with STW.
 - Holds the Supplier as solely responsible for any and all damages caused by goods failing to comply with STW.

and lastly,

- 5) We acknowledge that approval of a "sample" and any subsequent "repetition" of goods by the INDITEX Group do not release us from our liability, for the entire production, marketing and distribution processes.

THE SUPPLIER IS RESPONSIBLE FOR ALWAYS REFERRING TO THE LATEST UPDATED VERSION OF THIS DOCUMENT, AVAILABLE AT www.inditex.com.

INDITEX

Sustainability Department

www.inditex.com