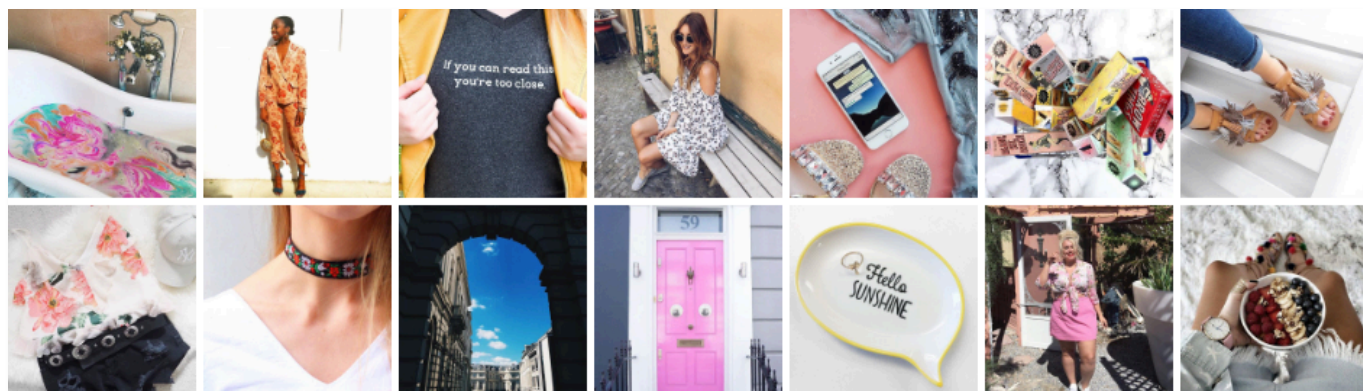


UN GLOBAL COMPACT

Communication on Progress

2015 – 2016



CHIEF EXECUTIVE STATEMENT OF SUPPORT

25th June 2016

H.E. Ban Ki Moon
Secretary-General
United Nations
New York, NY10017
USA

Dear Mr Secretary-General,

ASOS has been a signatory to the UN Global Compact since 2012. Our corporate responsibility programme 'Fashion with Integrity' was relaunched in 2015 and further builds on our commitment to the aims and principles of this important initiative. Fashion with Integrity sets out how ASOS will make a positive contribution to raising standards within the fashion industry in the fields of human and labour rights, environmental protection and business integrity.

Through our fourth Active level Communication on Progress I welcome the opportunity to express ASOS' continued support for the Global Compact, and to report on how our policies, programmes and goals actively promote its 10 principles. All ASOS Communication on Progress submissions can also be downloaded from our public corporate responsibility website. We also provide an index for our stakeholders on our website signposting where they can find more information about how ASOS supports each of the Global Compact principles. Our Communication on Progress submissions and Global Compact Index can be found here: <http://www.asosplc.com/responsibility/fashion-with-integrity/the-united-nations-global-compact.aspx>

We are a rapidly growing global business, and while I know there is more for us to do to balance our impacts, I am excited by the progress we are making to advance the development of more sustainable materials and processes within the industry and beyond.



Nick Beighton
Chief Executive Officer, ASOS Plc

HUMAN RIGHTS

Principle 1:

Businesses should support and respect the protection of internationally proclaimed human rights

Principle 2:

Businesses should make sure that they are not complicit in human rights abuses

ASSESSMENT, POLICY AND GOALS

Assessment and policy

- In our human rights statement we publicly commit to supporting the UN Declaration of Human Rights, the ILO Labour Conventions and the UN Guiding Principles on Business and Human Rights.
- Our human rights approach largely focuses on safeguarding the rights of workers within our global supply chain, where we perceive the greatest human rights' risks for our business to be.
- Our Ethical Trade Strategy sets out our commitment to being a responsible retailer, where every worker in our supply chain is respected and protected. The strategy's three year objectives are aimed at ensuring:
 1. workers in our supply chain have a voice, are free from forced labour, employed in safe environments and have improved financial literacy
 2. our sourcing practices are reviewed against our Ethical Standards and are continuously improved
 3. our suppliers share our ethical trade vision and work with us to achieve it.
- We require our suppliers to meet the ethical requirements set out in our Code of Conduct and Ethical Standards document.
- We assess all new suppliers and continue to review existing suppliers, via our supplier scorecards, to ensure they meet ASOS' human rights standards.
- Our regional Ethical Trade teams regularly visit supplier sites, monitor whether they are upholding our standards and provide support, where required.
- The principles set out in the ASOS Way, our Company values, provide the foundation for job descriptions, our recruitment, selection and promotion processes.
- We pride ourselves on being a fair and supportive employer. We do not hire or discriminate on the basis of age, gender, religious belief, ethnicity or nationality, sexual orientation, or disability.
- Our Cultural Sensitivity Guidelines help our design and communication teams to consider indigenous, cultural and religious rights when designing and marketing products.
- We have a country risk assessment process and training programme in place to help ensure the safety of ASOS employees when they are traveling abroad.

Our goals

- Explore ways to improve worker management dialogue in factories.
- Continue to work with suppliers to improve health and safety standards.
- Implement worker wage improvement initiatives.
- Regularly review and improve ASOS' purchasing practices.
- Improve buyer understanding of the impact of purchasing practices on worker rights.
- Increase the support provided to suppliers to help them protect labour rights and advance their ethical trade programmes.
- Continue to map our supply chain beyond tier 1 to better understand and address social impacts.
- Develop a Modern Slavery Statement and approach with a focus on continuous improvement.
- Continue to raise internal awareness and provide training to design and communication teams on our Cultural Sensitivity Guidelines.

IMPLEMENTATION

- Our human rights matrix, which includes clear guidelines on the rights of employees, customers, supply chain workers and communities, demonstrates the policies we have in place to protect and promote the rights of these stakeholders and how we monitor them.
- Our Corporate Responsibility Leadership Group is responsible for overseeing and regularly reviewing our approach to human rights. The Group, comprised of Head of Corporate Responsibility, directors of Sourcing and People departments, General Counsel & Company Secretary, Head of Ethical Trade, Fabric and Sustainability Manager and Communications Director meets regularly discuss emerging risks and to set policies and standards relating to human and labour rights, environmental impacts and business integrity.
- All new starters receive a contract, employee handbook and a set of the company standards, the ASOS Way, clearly explaining employees' rights and responsibilities.
- Our buyers and merchandisers receive regular training on how to support and promote human rights within the supply chain.
- ASOS' Ethical Trade team conduct regular supplier risk assessments and visits to identify and monitor human rights risks and provide support where required. We also hold regular supplier workshops focussing on key issues in each sourcing region.
- We are a member of the Better Cotton Initiative which exists to make global cotton production better for the people who produce it and the environment it grows in.
- We are one of 17 brands participating in ACT: 'Action, Collaboration and Transformation', an initiative between international brands, manufacturers and trade unions to address the issue of living wages in the textile and garment supply chain.
- We use social media to engage with our customers and the wider fashion industry on issues such as cultural diversity and human and workers' rights within our supply chain.
- 'We're Listening', is our confidential independently operated 24/7 helpline, through which employees can raise any concerns – including about their rights. Concerns are then passed to our General Counsel for investigation and remain strictly confidential at all times. The helpline is promoted on posters displayed in all of our offices.
- We also provide a confidential helpline for our UK manufacturing sites.
- In 2013 we carried out an internal risk assessment and safety review of every country visited by ASOS employees. We sought specific security advice for high-risk countries and now offer personal security updates and training for colleagues who plan to visit these areas.

ACHIEVEMENTS

- We carried out 383 visits to supplier sites between July 15 and May 2016 in order to assess and monitor workers' rights and to provide support to help meet our ethical standards.
- We updated our Ethical Code of Conduct to include a statement on migrant labour and produced a set of migrant labour guidelines to strengthen our position in this area and to help suppliers comply with our requirements.
- We are a founder brand of Fast Forward, a collaborative initiative to build labour standards compliance within the UK garment and general merchandise retail supply base.
- We updated our Ethical Code of Conduct to include a statement on migrant labour and produced a set of migrant labour guidelines to strengthen our position in this area and to help suppliers comply with our requirements.
- We set up a cross-functional group to address the requirements of the Modern Slavery Act 2015. The group's remit is to ensure that all areas of the business understand modern slavery risks, to undertake modern slavery due diligence and to develop processes and policies to mitigate these risks.
- We developed guidelines and held workshops with retail and editorial colleagues on customer diversity and cultural sensitivity.

LABOUR RIGHTS

Principle 3:

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining

Principle 4:

The elimination of all forms of forced and compulsory labour

Principle 5:

The effective abolition of child labour

Principle 6:

The elimination of discrimination in respect of employment and occupation

ASSESSMENT, POLICY AND GOALS

Assessment and policy

- Our Ethical Trade Strategy sets out our commitment to being a responsible retailer, where every worker in our supply chain is respected and protected. The strategy's three year objectives are aimed at ensuring
 1. workers in our supply chain have a voice, are free from forced labour, employed in safe environments and have improved financial literacy
 2. our sourcing practices are reviewed against our Ethical Standards and are continuously improved
 3. our suppliers share our ethical trade vision and work with us to achieve it.
- We require our suppliers to meet the ethical requirements set out in our Code of Conduct and Ethical Standards document. Our stance is derived from the UN Declaration on Human Rights and the ILO Labour Conventions, and covers: terms of employment for workers at manufacturing sites, including preventing forced and compulsory labor; freedom of association and the right to collective bargaining; wages and working hours; young workers; maintaining a fair and respectful working environment; health and safety.
- We assess all new suppliers and continue to review existing suppliers, via our supplier scorecards, to ensure they meet the human rights standards set out in our Ethical Code of Conduct and Ethical Standards document.
- We have a Young Worker and Child Labour Policy in place to ensure our suppliers have implemented effective systems to check the ages of all recruited employees and assess specific young worker risks.
- We provide our suppliers with Migrant Labour Guidelines to ensure they implement effective systems for responsible recruitment of migrant workers.
- We pride ourselves on being a fair and supportive employer. We do not hire or discriminate on the basis of age, gender, religious belief, ethnicity or nationality, sexual orientation, or disability.
- The principles set out in the ASOS Way, our Company values, provide the foundation for job descriptions, our recruitment, selection and promotion processes.
- All new starters receive a contract, employee handbook and a set of the company standards, the ASOS Way, clearly explaining employees' rights and responsibilities.
- We joined the Business Disability Forum in 2012 and have aligned our approach with the Forum's Disability Standard, a set of ten criteria designed to help all aspects of the business become 'disability-smart'.
- Our Cultural Sensitivity Guidelines help our design and communication teams to consider indigenous, cultural and religious rights when designing and marketing products.

Our goals

- Explore ways to improve worker management dialogue in factories.
- Continue to work with suppliers to improve H&S standards.
- Implement worker wage improvement initiatives.
- Regularly review and improve ASOS' purchasing practices.
- Improve buyer understanding of the impact of purchasing practices on worker rights.
- Continue to map our supply chain beyond tier 1 to better understand and address social impacts.
- Increase the support provided to suppliers to help them protect labour rights and advance their ethical trade programmes.
- Hold ethical trade induction sessions for all new buyers and technicians every two months.
- Launch a new UK intranet to help maintain good employee relations and continue to build employee trust and engagement.
- Train employees on our newly developed disability awareness programme.
- Further develop our work on cultural sensitivity and diversity, with a focus on increasing access to our products and services for customers with disabilities.
- Develop an action plan to improve accessibility of ASOS' digital communications to customers with visual impairments, following an RNIB audit of our systems.

IMPLEMENTATION

- Our Corporate Responsibility Leadership Group is responsible for discussing risks and for setting policies and standards relating to human and labour rights, environmental impacts and business integrity.
- Our Sourcing Director is responsible for overseeing and regularly reviewing our approach to managing labour practices in our supply chain. Our Procurement & Facilities Director is responsible for the health and safety of all our employees.
- ASOS' Ethical Trade programme helps us to ensure that our products are sourced from manufacturers who operate in a way that respects workers' rights, maintains safe working conditions, upholds local employment laws and protects the environment.
- We have a UK-based Ethical Trade management team and regional Ethical Trade teams in China, Eastern Europe, India, Turkey and UK, now comprising 19 ethical trade experts. The Ethical Trade team sits within ASOS' sourcing function so that we can put ethical considerations at the heart of supply chain decision-making.
- ASOS' Ethical Trade team conduct regular supplier risk assessments and we aim to visit all 503 factories regularly to assess how they are performing against our standards, monitor labour practices and provide support where required.
- We have been a member of an alliance of companies, non-governmental organisations and trade unions called the Ethical Trading Initiative (ETI) since 2009. We regularly attend ETI meetings and participate in the following working groups set up to address labour rights issues: Apparel and Textiles Group, Medium Companies
- All new employees receive information on how we protect their labour rights during induction training, as well as on our Ethical Trade programme and how we manage supply chain labour standards. In addition, our buyers and merchandisers receive ongoing training on how to support and promote labour rights within the supply chain.
- Every two months we hold review meetings with buying teams to discuss sourcing strategies and to inform them of any new ethical trade projects we are implementing.
- We also send out a monthly sourcing newsletter to our buying teams to inform them of ethical trade updates and best practice.
- We hold regular supplier and factory workshops focussing on key issues in each sourcing region.
- We are a member of the Better Cotton Initiative which exists to make global cotton production better for the people who produce it and the environment it grows in.
- We are one of 17 brands participating in ACT: 'Action, Collaboration and Transformation', an initiative between international brands & retailers, manufacturers, and trade unions to address the issue of living wages in the textile and garment supply chain.
- We engage with our customers and the wider fashion industry on issues such as cultural diversity and human and workers' rights within our supply chain through a number of social media platforms.
- The People Hub, our integrated global human resources IT system, enables us to store, access and analyse more detailed data about our employees and their careers, and monitor our progress in promoting equality and diversity.

Group, China Forum, UK and Turkey.

- Our 'Celebrating Diversity' disability programme covers a number of areas, including improving website access to customers with disabilities, making our communications more inclusive and establishing working groups in key departments to improve internal awareness and create opportunities for young adults with disabilities.
- ASOS worked with the British Paralympic Association (BPA) to design formal and ceremonial wear for ParalympicsGB. Our Paralympics legacy forms part of our Celebrating Diversity programme and seeks to raise awareness of disability, and to increase accessibility of employment opportunities for talented people with disabilities.
- We regularly consult our employees on any proposed changes to employment terms, working environments and our company values.
- We have internal communications such as Facebook at work and ASOS Home which enable better access to ASOS policies and information regarding working conditions as well as allowing real time feedback from employees.
- We're Listening, is our confidential independently operated 24/7 helpline, through which employees can raise any concerns, including about employment rights.
- We also provide a confidential helpline for our UK manufacturing sites.

ACHIEVEMENTS

- We carried out 383 visits to supplier sites between July 15 and May 2016 in order to assess and monitor workers' rights and to provide support to help meet our ethical standards.
- We developed a supplier scorecard to enable us to grade suppliers on their ethical trade as well as commercial performance.
- We updated our Ethical Code of Conduct to include a statement on migrant labour and produced a set of migrant labour guidelines to strengthen our position in this area and to help suppliers comply with our requirements.
- We held ethical trade supplier workshops or conferences in UK, China, Turkey and Mauritius.
- We set up a cross-functional group to address the requirements of the Modern Slavery Act 2015. The group's remit is to ensure that all areas of the business understand modern slavery risks, to undertake modern slavery due diligence and to develop processes and policies to mitigate these risks.
- We are a founder brand of Fast Forward, a collaborative initiative to build labour standards compliance within the UK garment and general merchandise retail supply base.
- We developed guidelines and held workshops with retail and editorial colleagues on customer diversity and cultural sensitivity.
- The RNIB carried out an audit of our websites and mobile sites to identify ways that we can improve accessibility for customers with visual impairments.
- We are using our relationship as supplier of formal wear to the ParalympicsGB team as a stimulus to improve our awareness of disability. Some of the activities we have undertaken this year include:
 - working with Paralympian athletes to understand the fashion needs of people with disabilities
 - partnering with disability charity SCOPE and donating products to raise funds for employment accessibility programmes for young adults
 - providing training to employees on disability awareness
 - reviewing the equality of opportunities for potential and current employees with disabilities.

ENVIRONMENT

Principle 7:

Businesses should support a precautionary approach to environmental challenges

Principle 8:

Undertake initiatives to promote greater environmental responsibility

Principle 9:

Encourage the development and diffusion of environmentally friendly technologies

ASSESSMENT, POLICY AND GOALS

Assessment and policy

- ASOS' Environmental Policy sets out our approach to managing our environmental impacts and commitments and covers: continuously improving environmental performance; reducing pollution; using resources more efficiently; consider environmental criteria when leasing and using office buildings and when procuring goods and services; measuring and cutting our carbon footprint; managing waste; complying with all environmental legislation and requirements.
- We began measuring our carbon footprint in 2008. We recently developed a new carbon strategy which defines key ambitions for the business that focus on reducing our energy consumption and delivery and packaging emissions and increasing our renewable energy usage.
- Our Ethical Trade Code of Conduct and Standards for suppliers also include environmental requirements. Suppliers must assess and manage waste, water energy and hazardous substances.

Our Business goals

- As part of our new carbon strategy to reduce our carbon intensity every year until 2020 we have set ourselves key ambitions to increase energy efficiency and renewable energy sourcing and to prioritise carbon efficient delivery and packaging partners.
- Continue to review all of our packaging with our suppliers to ensure that we are providing the most effective solutions to customers with the least environmental impact.
- Fulfil 90% of European (excluding UK) orders through our German Eurohub to reduce stock and vehicle movements across Europe.
- Continue to extend our waste packaging management and compliance programmes to cover additional territories.

Sustainable Sourcing goals

- Set further ambitious goals to use more sustainable materials in our product ranges.
- Work with womenswear and menswear to develop and implement strategies to increase the use of sustainably sourced materials in our own label and branded ranges.
- Aim to double the value of our Eco Edit sustainable product platform by 2020.
- Map our supply chain beyond tier 1 to better understand and address its environmental impacts.
- Promote the menswear section of our Eco Edit sustainable product platform due to be launched in AW 2016.
- Continue to work with SCAP to measure our product lifecycle impacts and collaborate with the sector to find ways to reduce water, waste and carbon emissions.

IMPLEMENTATION

Overall

- Our Corporate Responsibility Leadership Group meets regularly to discuss risks and to set policies and standards relating to human and labour rights, environmental impacts and business integrity.
- Andrew Magowan, General Counsel & Company Secretary is responsible for overseeing and regularly reviewing our environmental management approach.

Our Business

- Our Corporate Responsibility and Sourcing teams work with all areas of the business to manage our environmental impacts, including carbon emissions, energy, chemicals, packaging, water and waste.
- The biggest contribution to our carbon footprint is emissions from customer deliveries. We are working with our delivery partners to minimise these emissions by:
 - continuously reviewing and reducing packaging, thereby allowing more packages to be loaded onto delivery trailers to maximise capacity
 - working in partnership with our third party delivery partners, who are introducing fuel saving technologies such as route planning software to cut the length of journeys and researching low-carbon vehicles and fuels
 - including environmental criteria in our tendering process enabling us to award contracts to partners who are working to reduce their own emissions
 - developing a supplier environmental benchmarking scorecard.
- We have established a Eurohub in Germany that fulfils all of our European orders (excluding the UK), reducing stock and vehicle movements across Europe.
- The energy efficiency and carbon reduction measures we have put in place in our buildings include:
 - extending our Barnsley fulfilment centre by over 25%, enabling us to hold more stock and therefore reducing the number of miles our vehicles travel by 200,000 per year, saving 250 tons of carbon. Our fulfilment centre has been rated 'excellent' by BREEAM (the Building Research Establishment's environmental assessment method)
 - installing more efficient lighting systems.
 - purchasing energy using a green energy tariff (this applies when we directly purchase our own energy).
- Our packaging initiatives include:
 - using lighter packaging to help reduce emissions from customer deliveries, and increasing recycled content and improving its recyclability
 - working closely with our waste packaging advisory service to ensure we comply with international regulations on consumer waste
 - recycling all of the packaging that comes through our returns processing site.
- We support community infrastructure in Kenya where one of our suppliers is based, by providing drinking water to over 10,800 local people, through the provision of a water rock catchment and tank system and 6km pipeline.
- We monitor our suppliers' ability to meet our environmental standards through regular visits by our regional Ethical Trade teams.

Sustainable Sourcing

- Our Sourcing team helps our buyers and designers to source materials and products more sustainably, providing training, access to new materials and guidance on supply chain integrity.
- We regularly update all of our buying and technical teams on our Product Sustainability Programme and run events to inspire more sustainable sourcing.
- We are launching a 'Sustainable Leaders' programme with the Sustainable Fashion Academy, to deepen engagement and ownership of sustainable sourcing among buying, design, technical and marketing teams.
- The Eco Edit, launched on Womenswear in 2010 and soon to include menswear, is a section of our website where our customers can find out about and buy our most sustainable fashion and beauty products.
- We tag with a 'Signpost' image all products that we sell that have a social or environmental benefit which helps to promote sustainable fashion to our customers and buying teams.
- We are partnering with The Sustainable Clothing Action Plan, SCAP, to reduce the water use, carbon emissions and waste of ASOS own-label products sold in the UK.
- As a member of the Better Cotton Initiative, we collaborate with suppliers to create demand for Better Cotton and have secured increased supplier participation season on season.
We are working with strategic men's and womenswear suppliers to implement our sustainable sourcing cotton strategy.
- ASOS Marketplace promotes reuse and recycling by providing a platform to sell and buy pre-owned fashion items.
- We support Canopy, a global initiative working to phase out the use of endangered forest fibre in fabric.
- We are a member of the Leather Working Group and are working with them to map our leather supply chain and identify social and environmental risks.

ACHIEVEMENTS

Our Business

- We have reduced carbon intensity, as measured by grams per customer order by approximately 4% compared to the previous year.
- We signed off a new carbon strategy which aims to reduce our energy consumption and delivery and packaging emissions, and to increase our renewable energy usage.
- 45% of European orders (excluding UK) are now fulfilled from our German Eurohub, reducing stock and vehicle movements and emissions across Europe,
- We set up a customer clothes recycling scheme in partnership with Duddle, a package delivery company and TRAIID, a UK charity who are reducing the social and environmental cost of the textile industry. TRAIID will receive funds from clothes donated by ASOS customers that are sold in its shops.
- We expanded our waste compliance programme to cover a further 10 territories.
- We are in the process of replacing all of the lighting at our Barnsley fulfilment centre to low carbon LED fittings, at a cost of £600,000.
- We carried out a desktop environmental assessment to benchmark our top 30 non-stock suppliers with the aim of developing supplier environmental scorecards.
- We completed an action plan for undertaking energy audits of all our UK premises.
- Our data centre reduced emissions by 43% through the procurement of more energy efficient equipment.
- Our returns processing site in Selby recycled 106 tonnes of cardboard and sent 181 tonnes of plastic to be transformed into manufacturing pellets.
- As part of our community infrastructure programme in Kenya we installed a 6km pipeline to bring water to an additional 3800 local people.

Sustainable Sourcing

- We strengthened our Sourcing team with two new team members, including a Compliance Manager to ensure we continue to develop our approach to chemicals management.
- We implemented a continuous improvement plan for responsible chemicals management.
- We successfully relaunched our Green Room sustainable product platform under 'Eco Edit', doubling, on average, customer sales from the platform.
- We set up Eco Edit on Instagram to promote to our customers the stories behind the featured sustainable brands.
- We joined the WWF Leather Buyers Platform, a working group collaborating to map and reduce pollution from tanneries in the Ganges River Delta.
- We developed a calendar of inspirational and educational events for buying and technical teams to help promote more sustainable sourcing.
- Our AW16 collections are on track to contain 40% sustainable Better Cotton, including Cotton made in Africa (CmiA).
- We delivered sewing, technical and management training to SOKO employees and to the local community where SOKO, our ASOS Africa manufacturer, is based so that we can build SOKO's capacity and extend the ASOS Africa range.

ANTI-CORRUPTION

Principle 10:

Businesses should work against corruption in all its forms, including extortion and bribery

ASSESSMENT, POLICY AND GOALS

Assessment and policy

- In 2013 we launched 'Do the Right Thing', the ASOS Code of Integrity which promotes integrity, best practice and appropriate corporate behaviours across our business in the following areas:
 - complying with laws
 - prohibiting and combating corruption and bribery
 - dealing fairly in business
 - contracting openly with connected parties
 - ensuring gifts and hospitality are appropriate
 - protecting company assets and information.
- 2014 we rolled out the ASOS Do The Right Thing Code to all of our stock suppliers and our main non-stock suppliers.
- We have also developed a set of supplier Ethical Standards and Code of Conduct, that all suppliers must sign up to if they want to do business with us, which includes business integrity.

Our goals

- Keep Do The Right Thing as a central tenet of how ASOS operates, day to day, in all parts of its business.
- Improve employee and supplier understanding, engagement and compliance with Do The Right Thing so that as we continue our rapid international growth business integrity remains part of ASOS' DNA.
- Review the Do the Right Thing business integrity communications strategy.
- Reiterate the purpose of the gifts policy to ASOS employees, to reinforce their buy-in to the policy and improve the level of reporting of all corporate hospitality and gifts received and given by ASOS employees.
- Increase awareness of We're Listening, our confidential, independent helpline for employees.

IMPLEMENTATION

- Andrew Magowan, General Counsel & Company Secretary is responsible for overseeing and regularly reviewing our business integrity standards and performance.
- Our Corporate Responsibility Leadership Group meets regularly to discuss risks and to set policies and standards relating to human and labour rights, environmental impacts and business integrity.
- At the end of each financial year senior managers are required to confirm any incidences of non-compliance with ASOS' Do the Right Thing Code.
- We report quarterly to ASOS' Audit Committee on the overall level of corporate hospitality and gifts accepted, declined and given by each department, to enable any relevant trends and learnings to be more readily identified and to assess how appropriately the Code is being applied.
- All new starters receive information on Do The Right Thing when they join ASOS.
- We include information on Do The Right Thing in our new intranet, ASOShome, as well as on our integrated global human resources IT system, the 'People Hub'.
- Our buyers and merchandisers receive training on how to promote Do The Right Thing and our anti-bribery stance within our supply chain.
- As part of a multi-faceted approach to encouraging and enabling anyone connected with ASOS to raise concerns, questions and ideas (alongside an open-desk approach from Executives and many email routes), we operate We're Listening, our confidential independently-operated 24/7 helpline, through which employees can raise any concerns, including about business integrity. Concerns are then passed to our General Counsel for investigation and remain strictly confidential at all times. The helpline is promoted on posters displayed in all of our offices.
- We also provide a confidential helpline for our UK manufacturing sites.

ACHIEVEMENTS

- We enhanced our business integrity due diligence process for key third party suppliers and service providers in selected countries and industries.
- We implemented more detailed reporting on gifts and hospitality received and given by ASOS employees.