



asos

United Nations Global Compact

**Advanced Communication on Progress
2018 - 2019**

Chief Executive Statement of support

Dear Mr Secretary-General,

I am pleased to reaffirm ASOS' continued support of the UN Global Compact (UNGC) and its ten principles with respect to human rights, labour, environment and anti-corruption.

In this our seventh Communication on Progress, we value the opportunity to demonstrate the progress we've made to further integrate these principles within our business strategy, culture and day-to-day company operations.

We state our commitment to the UNGC and share all ASOS Communication on Progress submissions on our public corporate responsibility website. We also provide an index with this submission signposting where stakeholders can find further information about how ASOS supports each of the UNGC principles.

We recognise the vital contribution the UNGC has made in raising global business sustainability standards, and we're determined to become a positive force for people, animals and the planet within our industry.



A handwritten signature in black ink, appearing to read 'Nick Beighton'.

Nick Beighton
Chief Executive Officer, ASOS Plc

Implementing the ten principles into strategies & operations

The table below sets out examples of the best practices we have adopted under each of the UN Global Compact Advanced Level reporting criteria and contains links to where further information can be found.

1. The COP describes mainstreaming into corporate functions and business units

UNGC best practices	ASOS Examples	References/links
Place responsibility for execution of sustainability strategy in relevant corporate functions (procurement, government affairs, human resources, legal, etc) ensuring no function conflicts with company's sustainability commitments and objectives.	We are in the process of restructuring how we govern our corporate responsibility programme, Fashion with Integrity (FWI). We are forming one Executive level FWI governance group, chaired by our CEO. All Executive Directors will participate in this group and be responsible for ensuring FWI is embedded within their functional strategies.	ASOS FWI >
Assign responsibility for corporate sustainability implementation to an individual or group within each business unit and subsidiary	See above	See above
Ensure that different corporate functions coordinate closely to maximize performance and avoid unintended negative impacts	See above	See above

2. The COP describes value chain implementation

UNGC best practices	ASOS Examples	References/links
Analyse each segment of the value chain carefully, both upstream and downstream, when mapping risks, opportunities and impacts	<ul style="list-style-type: none"> Our Responsible Sourcing programme covers ASOS Brands and non-stock suppliers. All third-party brands we sell must complete an ethical and sustainable self-assessment questionnaire (SAQs) so we can establish baseline performance level. Our approach to supply chain risk assessment comprises of desk-based research, supply chain mapping, SAQs, auditing and stakeholder engagement. 	ASOS Supply Chain > Ethical Trade Programme > Sustainable Sourcing Programme> Modern Slavery Statement > Third-Party Brands Programme >
Communicate policies and expectations to suppliers and other relevant business partners	<ul style="list-style-type: none"> ASOS Brands and non-stock suppliers are contractually required to comply with ASOS codes and policies. Follow the Policies link for further information. Third-party brands are contractually required to implement five Minimum Requirements ("5MRs") on ethical trade and sustainability. Suppliers and supply chain partners are regularly engaged on these policies through training, monthly supplier newsletters and workshops, webinars, close relationship management and in-country regional conferences. 	ASOS Reporting and Policies > Ethical Trade Programme > Sustainable Sourcing Programme> Modern Slavery Statement > Third-Party Brands Programme >
Implement monitoring and assurance mechanisms (e.g. audits/screenings) for compliance within the company's sphere of influence	<ul style="list-style-type: none"> Our supplier audit programme identifies risk at factory level against our Supplier Ethical Code and local law. In the last financial year, together with third-party auditors, we carried out 713 unannounced audits, giving visibility of working conditions in our factories. We collaborate with third-party organisations to help us better understand the complex nature of our supply chains, while providing us with responsible sourcing assurance. 	Ethical Trade Programme > Sustainable Sourcing Programme> Modern Slavery Statement > Third-Party Brands Programme >
Undertake awareness-raising, training and other types of capacity building with suppliers and other business partners	<ul style="list-style-type: none"> We run regular tailored conferences, workshops and online webinars and provide training tools for suppliers and partners. We also participate in a number of initiatives aimed at building supplier capacity. Follow the links for further information. 	Ethical Trade Programme > Sustainable Sourcing Programme> Modern Slavery Statement > Ethical Trade Partnerships > Sustainable Sourcing Partnerships > Third-Party Brands Programme >

3. The COP describes robust commitments, strategies or policies in the area of human rights

UNGC best practices	ASOS Examples	References/links
Commitment to comply with all applicable laws and respect internationally recognized human rights, wherever the company operates (e.g., the Universal Declaration of Human Rights, Guiding Principles on Human Rights)	<ul style="list-style-type: none"> FWI is continuously being developed in alignment with UN Global Compact and the United Nations Guiding Principles on Business and Human Rights. All ASOS codes and policies are aligned with internationally-recognised human rights standards. Our 5MRs for third-party brands are based on internally recognised standards and legislation like the Ethical Trading Initiative Base Code and UK Modern Slavery Act. 	ASOS Reporting and Policies > ASOS UN Global Compact > Ethical Trade Programme > Third-Party Brands Programme >
Integrated or stand-alone statement of policy expressing commitment to respect and support human rights approved at the most senior level of the company	<p>We have integrated statements of policy expressing our commitment to respect and support human rights, which are all approved at Board level:</p> <ul style="list-style-type: none"> Supplier Ethical Code Child Labour Remediation and Young Worker Policy Contract and Migrant Worker Policy Modern Slavery Statement 	ASOS Reporting and Policies > Ethical Trade Programme > Modern Slavery Statement >
Statement of policy publicly available and communicated internally and externally to all personnel, business partners and other relevant parties	<p>We have a number of policies stipulating our human rights expectations:</p> <ul style="list-style-type: none"> Supplier Ethical Code (including for non-stock and third-party brands) Child Labour Remediation and Young Worker Policy Migrant and Contract Labour Policy Modern Slavery Statement Third-Party Brand Minimum Requirements 	ASOS Reporting and Policies > Ethical Trade Programme > Modern Slavery Statement > Third-Party Brands Programme >
Statement of policy publicly available and communicated internally and externally to all personnel, business partners and other relevant parties	<p>Our policies and statements are all available on our public Plc website. Employees and supply chain partners are regularly engaged on these policies through internal communications, training, a monthly supplier newsletter, close relationship management and in country regional conferences.</p>	ASOS Reporting and Policies >

4. The COP describes effective management systems to integrate the human rights principles

UNGC best practices	ASOS Examples	References/links
Process to ensure that internationally recognized human rights are respected	<ul style="list-style-type: none"> We work closely with our suppliers and third-party brands to help them meet our standards and improve conditions for workers in our supply chain. We've developed our own detailed ethical trade audit methodology, which is designed to support and encourage transparency as well as compliance with our codes and policies. Our audit programme also provides valuable input into our wider labour rights risk assessment and programme work. 	Ethical Trade Programme > Third-Party Brands Programme >
On-going due diligence process that includes an assessment of actual and potential human rights impacts	<ul style="list-style-type: none"> ASOS' approach to risk assessment comprises desk-based research, supply chain mapping, auditing and stakeholder engagement to assess actual and potential human rights impacts. Our audit programme identifies risk at factory level against our Supplier Ethical Code and local law. Our annual corporate risk assessment process, which includes human rights, is overseen by the General Counsel and Company Secretary on behalf of the ASOS Plc Board. 	Ethical Trade Programme > Modern Slavery Statement >
Internal awareness-raising and training on human rights for management and employees	<ul style="list-style-type: none"> ASOS CEO and Executive Directors are engaged in regular discussions on human rights and are involved in strategic decision making. We have a number of related training programmes in place, covering our responsible sourcing strategy, modern slavery, purchasing practices, freedom of association and gender equality, amongst others. 	Ethical Trade Programme > Modern Slavery Statement >

Allocation of responsibilities and accountability for addressing human rights impacts	<ul style="list-style-type: none"> The Chief Executive and ASOS Executive Board are responsible for ensuring ASOS meets its human rights responsibilities. We have a team of 16 experts working together with third-party auditors in key product sourcing regions to understand country-specific issues, ensure our ethical standards are being upheld, and regularly engage with local and international stakeholders. Seven members of the third-party brands team support over 1,000 brands sold on ASOS, focusing on implementing best practice in the areas of ethical trade and sustainability. 	Ethical Trade Programme > Modern Slavery Statement > Third-Party Brands Programme >
Operational-level grievance mechanisms for those potentially impacted by the company's activities	<p>We have a number of formal and informal feedback mechanisms across our operations:</p> <ul style="list-style-type: none"> Company grievance procedure Whistleblowing helpline 'We're Listening' covering ASOS employees and contractors in ASOS premises We have launched a hotline application in Turkey in Turkish and Arabic in conjunction with IndustriALL Global Union, which provides information to workers about their rights and give them access to remedy. 	Modern Slavery Statement >
Internal decision-making, budget and oversight for effective responses to human rights impacts	<ul style="list-style-type: none"> We have processes and budgets in place to respond to and remediate human rights impacts. Depending on the severity of the impact we involve a number of key internal decision makers, including, when required, the Executive Board. Our budget is relatively evenly split between our audit programme and 'beyond audit' initiatives, including membership of multi-stakeholder initiatives and capacity building projects to address difficult or endemic issues. 	Modern Slavery Statement >
Processes to provide for or cooperate in the remediation of adverse human rights impacts that the company has caused or contributed to	<ul style="list-style-type: none"> We continue to build local NGO and Trade Union partnerships in order to monitor and deliver effective remediation of any adverse human rights impacts. We have a partnership with Anti-Slavery International, helping to ensure that our human rights due diligence processes are robust, while supporting us to continuously review and mitigate new risks in our supply chain. The ASOS Child Labour, Remediation and Young Worker policy sets out the steps to remedy the discovery of child labour in our supply chain. 	Modern Slavery Statement > Child Labour Policy >
Process and programs in place to support human rights through: core business; strategic philanthropic/social investment; public policy engagement/advocacy; partnerships and/or other forms of collective action	<ul style="list-style-type: none"> We are actively involved with a range of organisations and initiatives. Follow the partnership link for more information. We have signed a Global Framework Agreement with IndustriALL Global Union, representing a strong framework for implementing freedom of association and other labour rights. We hold regular workshops and events to establish collaboration between third-party brands, including events at House of Lords, and our own Future of Fashion event in 2018. 	Ethical Trade Programme > Ethical Trade Partnerships > Modern Slavery Statement > Third-Party Brands Programme >

5. The COP describes effective monitoring and evaluation mechanisms of human rights integration

UNGC best practices	ASOS Examples	References/links
System to monitor the effectiveness of human rights policies and implementation with quantitative and qualitative metrics, including in the supply chain	<ul style="list-style-type: none"> We continue to build local NGO and trade union partnerships in order to monitor the implementation and effectiveness of human rights policies. We also use qualitative and quantitative data from audits and from other public sources to measure policy effectiveness and to prioritise our social programmes. We have established our own benchmarking standards to assess third-party brands Modern Slavery Statements against section 54 of UK Modern Slavery Act. 	Ethical Trade Programme > Modern Slavery Statement > Third-Party Brands Programme >
Monitoring drawn from internal and external feedback, including affected stakeholders	<ul style="list-style-type: none"> We conduct purchasing practices assessments with our retail teams and suppliers and use the findings to inform improvements and training. We contribute to notable industry-wide reports, for example the Fashion Transparency Index and use our results and feedback to inform our strategy and programmes. We regularly engage with suppliers to address challenges in implementing labour standards at the factory level. We partner with credible international stakeholders, for example Anti-Slavery International and IndustriALL Global Union to seek further independent feedback to inform strategy. 	Fashion Transparency Index > Ethical Trade Programme > Modern Slavery Statement >

Leadership review of monitoring and improvement results	We report Sourcing, Ethical Trade, Sustainability and Branded Responsible Sourcing performance to the Executive Board on a quarterly basis.	Modern Slavery Statement >
Process to deal with incidents the company has caused or contributed to for internal and external stakeholders	<ul style="list-style-type: none"> We have processes and budgets in place to respond to and remediate human rights impacts. Depending on the severity of the impact we involve a number of key internal decision makers, including, when required, the Executive Board. We continue to build local NGO and Trade Union partnerships in order to monitor and deliver effective remediation of adverse human rights impacts. 	Modern Slavery Statement >
Grievance mechanisms that are legitimate, accessible, predictable, equitable, transparent, rights compatible, a source of continuous learning, and based on engagement and dialogue	<p>We have a number of formal and informal feedback mechanisms across our operations:</p> <ul style="list-style-type: none"> Company grievance procedure Whistleblowing helpline 'We're Listening' covering ASOS employees and contractors in ASOS premises A hotline in Turkey which provides information to workers about their rights and give them access to remedy. 	Modern Slavery Statement >
Outcomes of integration of the human rights principles (external reporting of human rights impacts, disclosure of main incidents and outcomes of remediation)	Our Modern Slavery Statements transparently reports on outcomes and impacts of actions taken to address and remediate human rights abuses in our supply chain.	Modern Slavery Statement >

6. The COP describes robust commitments, strategies or policies in the area of labour rights

UNGC best practices	ASOS Examples	References/links
Reference to principles of relevant international labour standards (ILO Conventions) and other normative international instruments in company policies	<ul style="list-style-type: none"> ASOS Brands and non-stock suppliers are contractually required to comply with ASOS codes and policies. These include: ASOS Supplier Ethical Code, Child Labour Remediation and Young Worker Policy, Migrant and Contract Worker Policy. ASOS supports our third-party brands to develop their own Ethical Code to establish their own standards in their supply chains, in line with internationally recognised labour and human rights standards. 	ASOS Reporting and Policies > Ethical Trade Programme > Modern Slavery Statement > Third-Party Brands Programme >
Reflection on the relevance of the labour principles for the company	<ul style="list-style-type: none"> Our Modern Slavery Statements reflect on the relevance of labour principles. 	Modern Slavery Statement >
Written company policy to obey national labour law, respect principles of the relevant international labour standards in company operations worldwide, and engage in dialogue with representative organization of the workers (international, sectoral, national).	<p>We have the following labour standards policies in place:</p> <ul style="list-style-type: none"> Supplier Ethical Code Child Labour Remediation and Young Worker Policy Migrant and Contract Labour Policy We have signed a Global Framework Agreement with IndustriALL Global Union, representing a strong framework for implementing freedom of association and other labour rights. 	ASOS Reporting and Policies > ASOS GFA with IndustriALL >
Inclusion of reference to the principles contained in the relevant international labour standards in contracts with suppliers and other relevant business partners	<p>All suppliers are contractually obliged to comply with the following policies:</p> <ul style="list-style-type: none"> Supplier Ethical Code Child Labour Remediation and Young Worker Policy Migrant and Contract Labour Policy ASOS requires all new third-party brands to meet our 5MRs at the onboarding stage. This will be mandatory from September 2019. 	ASOS Reporting and Policies > Third-Party Brands Programme >

Specific commitments and Human Resources policies, in line with national development priorities or decent work priorities in the country of operation Examples: Inclusion of vulnerable/discriminated groups in the workforce (e.g., women, disabled, migrant, HIV/AIDS, older/younger workers); equal pay for work of equal value; contribution to national strategies to eliminate child/forced labour, etc.	<ul style="list-style-type: none"> ASOS has signed a Global Framework Agreement with IndustriALL and is a signatory of the UN's Women's Empowerment Principles to advance and empower women in the workplace and community. Our Supplier Ethical Code details specific commitments and Human Resources policies and every supplier must comply with the policy ASOS Our Customer FWI Pillar focusses on disability, diversity, LGBTQ+ and gender equality. ASOS Foundation partners with charities in the UK, India and rural Kenya on programmes to remove barriers to education, training and employment, particularly for women and marginalised groups. 	ASOS Reporting and Policies > ASOS GFA with IndustriALL > ASOS Foundation > Ethical Trade Partnerships >
Participation and leadership in wider efforts by employers' organizations (international and national levels) to jointly address challenges related to labour standards in the countries of operation, possibly in a tripartite approach (business – trade union – government).	We participate in a number of initiatives to collaboratively address labour standard challenges. Follow the partnership link for more information.	Ethical Trade Partnerships >
Structural engagement with a global union, possibly via a Global Framework Agreement	We have signed a Global Framework Agreement with IndustriALL, representing a strong framework for implementing freedom of association and other labour rights.	ASOS GFA with IndustriALL >

7. The COP describes effective management systems to integrate the labour principles

UNGC best practices	ASOS Examples	References/links
Risk and impact assessments in the area of labour.	<ul style="list-style-type: none"> We have mapped tiers 1 to 3 of our supply chain and partially mapped tiers 4 and 5. Our audit programme identifies risk at factory level against our Supplier Ethical Code and local law. We carried out 713 unannounced audits during the last financial year, giving visibility of working conditions in our factories. We regularly engage with international and local stakeholders to gain a better understanding of our impacts on labour and human rights in our countries of operations. We publish a Modern Slavery Statement annually. 	Ethical Trade Programme > Ethical Trade Partnerships > Modern Slavery Statement > Third-Party Brands Programme >
Dialogue mechanism with trade unions to regularly discuss and review company progress in addressing labour standards	<ul style="list-style-type: none"> We have signed a Global Framework Agreement with IndustriALL Global Union, representing a strong framework for implementing freedom of association and other labour rights. Through our ACT membership, we have signed a Memorandum of Understanding with IndustriALL Global Union that commits us to work with others in the sector to improve wages in key garment sourcing countries through collective bargaining. 	ASOS GFA with IndustriALL > ACT >
Allocation of responsibilities and accountability within the organization	<ul style="list-style-type: none"> The Chief Executive and ASOS Executive Board are responsible for ensuring ASOS meets its human rights responsibilities. They are supported by the Director of Corporate Responsibility, Responsible Sourcing Director and Head of Ethical Trade. We have a team of 16 ethical trade experts working together with third-party auditors in key product sourcing regions to understand country-specific issues, ensure our ethical standards are being upheld, and regularly engage with local and international stakeholders. Seven members of the third-party brands team support over 1,000 brands sold on ASOS, focusing on implementing best practice in the areas of ethical trade and sustainability. 	Ethical Trade Programme > Modern Slavery Statement > Third-Party Brands Programme >
Internal awareness-raising and training on the labour principles for management and employees	<ul style="list-style-type: none"> ASOS CEO and Executive Directors are engaged in regular discussions on human rights and are involved in strategic decision making. Our directors spend time with auditors and suppliers within factory and distribution centre environments to help them gain a better understanding of the issues these sites face. We train our retail employees on our Responsible Sourcing programme, responsible purchasing practices and respectful and collaborative supplier relationships. We have also delivered a digital training programme on modern slavery, and trained key business stakeholders on freedom of association and gender equality in our supply chain. 	Ethical Trade Programme > Modern Slavery Statement >

Active engagement with suppliers to address labour-related challenges	<ul style="list-style-type: none"> We run tailor made supplier conferences in our key sourcing destinations. We conducted a series of modern slavery focused webinars in collaboration with the Ethical Trading initiative for our Chinese suppliers on the Modern Slavery Act and risk in supply chains. We participate in a number of initiatives aimed at building supplier capacity. Follow the links for further information. We conducted a purchasing practices assessment with suppliers in recognition that our buying practices impact on our suppliers' ability to meet our ethical standards. 	Ethical Trade Programme > Modern Slavery Statement > Ethical Trade Partnerships > Third-Party Brands Programme >
Grievance mechanisms, communication channels and other procedures (e.g., whistle-blower mechanisms) available for workers to report concerns, make suggestions or seek advice, designed and operated in agreement with the representative organization of workers.	We have launched a hotline application in Turkey in Turkish and Arabic in conjunction with IndustriALL Global Union, which provides information to workers about their rights and give them access to remedy.	Modern Slavery Statement >

8. The COP describes effective monitoring and evaluation mechanisms of labour principles integration

UNGC best practices	ASOS Examples	References/links
System to track and measure performance based on standardized performance metrics	We monitor and report on our suppliers' ethical trade performance through an internal database that captures all our audit data. We report key performance indicators to Retail management on a monthly basis and to the Executive Board on a quarterly basis.	Ethical Trade Programme > Modern Slavery Statement >
Dialogues with the representative organization of workers to regularly review progress made and jointly identify priorities for the future	<ul style="list-style-type: none"> We have signed a Global Framework Agreement with IndustriALL Global Union, representing a strong framework for implementing freedom of association and other labour rights. Through our ACT membership, we review progress in addressing labour standards and jointly identify priorities for the future. Our regional teams and in-country Ethical Trade Managers facilitate development of relationships with relevant local stakeholders and parties e.g. trade unions and worker representative organisations. 	Modern Slavery Statement > Ethical Trade Partnerships >
Audits or other steps to monitor and improve the working conditions of companies in the supply chain, in line with principles of international labour standards	<ul style="list-style-type: none"> We have mapped tiers 1 to 3 of our supply chain and partially mapped tiers 4 and 5. Our audit programme identifies risk at factory level against our Supplier Ethical Code and local law. During the last financial year, we carried out 713 unannounced audits, giving visibility of working conditions in our factories. We regularly engage with international and local stakeholders to gain a better understanding of our impacts on labour and human rights in our countries of operations. 	Ethical Trade Programme > Modern Slavery Statement >
Process to positively engage with the suppliers to address the challenges (i.e., partnership approach instead of corrective approach) through schemes to improve workplace practices	<ul style="list-style-type: none"> As part of the 'Fast Forward' programme, we invite all our UK suppliers to participate in a workshop that sets out our Ethical Standards and processes that suppliers can use to achieve them. We hold tailor made supplier conferences in our key sourcing destinations, including India, China, Eastern Europe, UK and Turkey. We participate in a number of initiatives aimed at improving ethical supply chain practices. Follow the links for further information. 	Ethical Trade Programme > Modern Slavery Statement > Ethical Trade Partnerships > Third-Party Brands Programme >
Outcomes of integration of the Labour principles [report main incidences]	<ul style="list-style-type: none"> Our Modern Slavery Statements transparently report on outcomes and impacts of actions taken to address and remediate labours standard violations in our supply chain. 	Modern Slavery Statement >

9. The COP describes robust commitments, strategies or policies in the area of environmental stewardship

UNGC best practices	ASOS Examples	References/links
Written company policy on environmental stewardship.	We have a publicly available Environment Policy.	ASOS Environmental Policy >
Inclusion of minimum environmental standards in contracts with suppliers and other relevant business partners	<ul style="list-style-type: none"> ASOS Brands and non-stock suppliers are contractually required to comply with ASOS codes and policies. These include: ASOS Supplier Ethical Code, Environmental Policy, Wood and Wood Pulp Policy, ASOS Chemical policy and Restricted Substance List (RSL), ASOS Cotton Sourcing Policy, ASOS Animal Welfare Policy. As part of new brand set up and our five minimum requirements ('5MR') we expect all third-party brands to be compliant with relevant chemical legislation. 	ASOS Reporting and Policies > Sustainable Sourcing Programme > Third-Party Brands Programme >
Specific commitments and goals for specified years	Follow the link to review our 2018-19 environment and sustainable sourcing commitments.	Performance and Commitments >

10. The COP describes effective management systems to integrate the environmental principles

UNGC best practices	ASOS Examples	References/links
Environmental risk and impact assessments.	<p>We undertake the following risk and impact assessments:</p> <p>Business operations:</p> <ul style="list-style-type: none"> Carbon footprint assessment of business operations Renewable energy generation assessments <p>Supply chain:</p> <ul style="list-style-type: none"> Delivery GHG emissions assessments Environmental impact assessment of our apparel supply chain through Sustainable Apparel Coalition's Higg Index FEM Due diligence screening and testing to ensure compliance with our chemical policy and RSL. Supplier scorecards provide buyers with a summary of a supplier's sustainability data to inform their sourcing decisions. 	Carbon & Energy > ASOS Carbon Emissions Report > Sustainable Sourcing Programme > Sustainable Sourcing Partnerships >
Assessments of lifecycle impact of products, ensuring environmentally sound management policies	<ul style="list-style-type: none"> We use the Sustainable Clothing Action Plan's assessment tool to calculate ASOS Brands products' environmental footprint and Sustainable Apparel Coalition's Higg Index FEM to assess the environmental impact of our supply chain. We have undertaken impact assessments on all our packaging materials to enable us to reduce plastic use and emissions and have begun to integrate customer waste packaging into the manufacture of ASOS mailing bags. As part of our circular fashion system commitment we are incorporating a circular approach to sourcing materials and packaging. 	Sustainable Sourcing Programme > Sustainable Sourcing Partnerships > Packaging & Waste >
Allocation of responsibilities and accountability within the organisation	The Chief Executive and ASOS Executive Board are responsible for ensuring ASOS meets its environmental responsibilities. They are supported by the Director of Corporate Responsibility, Responsible Sourcing Director and Head of Sustainability.	

Internal awareness-raising and training on environmental stewardship for management and employees	<p>We run a number of awareness raising and training activities for employees:</p> <ul style="list-style-type: none"> • Incorporating FWI into the new ASOS Leadership programme and supporting events • Training 50+ sustainability ambassadors to drive environmental behavioural change • Environmental volunteering opportunities • Plastics Week – 5 days of talks, workshops and demonstrations on ways to reduce the impact of plastics on the environment • Retail training: Sustainable Fashion Academy, sustainable sourcing, including animal welfare, chemical management, circular fashion and sustainable raw materials • Supplier scorecards to provide buyers with a summary of a supplier’s sustainability data to inform their sourcing decisions. • Animal welfare training workshops to press and customer care teams • Branded Champions from among buyers and merchandisers in business to raise the profile of FWI. 	<p>ASOS Reporting and Policies > Sustainable Sourcing Programme > Third-Party Brands Programme > Sustainable Sourcing Partnerships > Packaging & Waste ></p>
Grievance mechanisms, communication channels and other procedures (e.g. whistle-blower mechanisms) for reporting concerns or seeking advice regarding environmental impacts	<p>We have a number of formal and informal feedback mechanisms across our operations:</p> <ul style="list-style-type: none"> • Company grievance procedure • Whistleblowing helpline ‘We’re Listening’ covering ASOS employees and contractors in ASOS premises • We raise awareness of these mechanisms through internal communications channels including social media, screens, workshops, online videos, conferences and the Employee Forum. 	<p>Modern Slavery Statement ></p>

11. The COP describes effective monitoring and evaluation mechanisms for environmental stewardship

UNGC best practices	ASOS Examples	References/links
System to track and measure performance based on standardized performance metrics	<p>We use a number of systems to track environmental performance:</p> <p>Business operations:</p> <ul style="list-style-type: none"> • Annual carbon emissions report for operations • Monthly tracking and benchmarking of carbon dioxide emissions from delivery partners • Preparation for ISO 50001 Energy efficiency standard at Barnsley fulfilment centre <p>Supply chain:</p> <ul style="list-style-type: none"> • Close engagement with our packaging and third-party logistics companies to remove unnecessary plastic or other materials from mail and transit packaging • Supplier sustainability scorecards • Sustainable Apparel Coalition’s Higg Index to track sustainability performance of our supply chain • Wet processing benchmarking tool for denim • SCAP’s assessment tool to calculate ASOS Brands products’ environmental footprint. • Cotton tracker for sustainable cotton • Interlink to evaluate suppliers’ chemical compliance 	<p>ASOS Reporting and Policies > ASOS Carbon Emissions Report > Carbon & Energy > Packaging & Waste > Sustainable Sourcing Programme > Third-Party Brands Programme > Sustainable Sourcing Partnerships ></p>
Leadership review of monitoring and improvement results	<p>We regularly report environmental and sustainability performance to the Executive Directors.</p>	
Audits or other steps to monitor and improve the environmental performance of companies in the supply chain	<p>See first best practice above</p>	<p>See first best practice above</p>

12. The COP describes robust commitments, strategies or policies in the area of anti-corruption

UNGC best practices	ASOS Examples	References/links
Publicly stated formal policy of zero-tolerance of corruption	The following ASOS codes state our policy of zero tolerance of corruption: <ul style="list-style-type: none"> Do the Right Thing – Code of Integrity (provided to all business partners and suppliers but not publicly available) Gifts & Hospitality Policy Supplier Ethical Code 	ASOS Business Integrity >
Commitment to be in compliance with all relevant anti-corruption laws, including the implementation of procedures to know the law and monitor changes	The following ASOS codes include commitments to be in compliance with relevant anti-corruption laws: <ul style="list-style-type: none"> ASOS Do the Right Thing - Code of Integrity Supplier Ethical Code 	ASOS Reporting and Policies > ASOS Business Integrity >
Detailed policies for high-risk areas of corruption	The ASOS Group Tax Strategy sets out our approach to managing tax risks.	ASOS Group Tax Strategy >
Policy on anti-corruption regarding business partners	All suppliers and third-party brands are contractually obliged to comply with the Do the Right Thing – Code of Integrity and the Supplier Ethical Code.	ASOS Reporting and Policies > Ethical Trade Programme >

13: The COP describes effective management systems to integrate the anti-corruption principle

UNGC best practices	ASOS Examples	References/links
Support by the organization's leadership for anti-corruption	The Executive Board are responsible for periodically updating Do the Right Thing – Code of Integrity	ASOS Business Integrity >
Carrying out risk assessment of potential areas of corruption	Business Assurance facilitates the quarterly risk review process across all business areas the results of which are then reviewed by the Risk and Audit Committee.	ASOS Annual Report 2018 >
Human Resources procedures supporting the anti-corruption commitment or policy, including communication to and training for all employees	<ul style="list-style-type: none"> All new employees are trained on Do the Right Thing code and Gifts & Hospitality policy. Employees receive refresher training on these policies through internal communications and workplace posts. Online tool for Gifts & Hospitality reporting. We send out regular internal communications to employees on business integrity issues. 	ASOS Business Integrity >
Internal checks and balances to ensure consistency with the anti-corruption commitment	<ul style="list-style-type: none"> Business Assurance facilitates the quarterly risk review process across all business areas. The results of which are then reviewed by the Risk and Audit Committee. 	ASOS Annual Report 2018 >
Actions taken to encourage business partners to implement anti-corruption commitments	<ul style="list-style-type: none"> All suppliers and third-party brands are contractually obliged to comply with Do the Right Thing – Code of Integrity and Supplier Ethical Code We run annual supplier training workshops which cover anti-corruption 	ASOS Business Integrity > Ethical Trade Programme >
Management responsibility and accountability for implementation of the anti-corruption commitment or policy	ASOS' General Counsel & Company Secretary is responsible for running our anti-corruption programme.	ASOS Business Integrity >
Communications (whistleblowing) channels and follow-up mechanisms for reporting concerns or seeking advice	<p>Our Board level Audit Committee ensures whistleblowing and reporting arrangements are in place. These include:</p> <ul style="list-style-type: none"> Employee gifts and hospitality online reporting tool Company grievance procedure Whistleblowing hotline for employees and contractors in ASOS premises <p>We raise awareness of these mechanisms through internal communications channels including social media, screens, workshops, online videos, conferences and the Employee Forum.</p>	Modern Slavery Statement > ASOS Business Integrity >
Internal accounting and auditing procedures related to anticorruption	Deloitte completes an internal audit of our business annually which includes a review of our anti-bribery and corruption measures.	ASOS Annual Report 2018 >

14. The COP describes effective monitoring and evaluation mechanisms for the integration of anti-corruption

UNGC best practices	ASOS Examples	References/links
Leadership review of monitoring and improvement results	The Audit Committee receives regular reports on the operation of our anti-corruption policies.	ASOS Annual Report 2018 >
Process to deal with incidents	We have a crisis management communication tool in place across all of our global sites.	
Use of independent external assurance of anti-corruption programmes	Deloitte completes an internal audit of our business annually which includes a review of our anti-bribery and corruption measures.	ASOS Annual Report 2018 >

15. The COP describes core business contributions to UN goals and issues

UNGC best practices	ASOS Examples	References/links
Align core business strategy with one or more relevant UN goals/issues	The four pillars of our FWI strategy, Our Products, Our Business, Our Customers and Our Community and the programmes of the ASOS Foundation drive our approach to business and all align with one or more of the SDGs.	Our Products > Our Business > Our Customers > Our Community > ASOS Foundation >
Develop relevant products and services or design business models that contribute to UN goals/issues	Some examples of the products and services we have developed include: <ul style="list-style-type: none"> ASOS Made in Kenya collections: manufactured by SOKO, a Kenyan clothing workshop that provides fair and safe employment and training for some of the country's poorest communities. Responsible sourcing strategy: we will only work with suppliers and third-party brands who are committed to helping us achieve our ethical and sustainable sourcing goals. Circular economy strategy: As a signatory to the 2020 Circular Fashion System commitment we've committed to four circular fashion targets relating to products, packaging and recycling waste. Producing two gender-neutral clothing ranges in partnership with GLAAD to support '&Together Movement' which promotes acceptance for all communities subject to discrimination. 	Made in Kenya > Our Products > GFA Circular Fashion Commitment > Inclusion Partnerships >

16. The COP describes strategic social investments and philanthropy

UNGC best practices	ASOS Examples	References/links
Pursue social investments and philanthropic contributions that tie in with the core competencies or operating context of the company as an integrated part of its sustainability strategy	As part of our FWI strategy we invest in a range of social programmes. Follow the links for more information.	ASOS Foundation > Ethical Trade Partnerships > Sustainable Sourcing Partnerships > Community Programmes > Inclusion Partnerships > Mind and Body Partnerships >
Coordinate efforts with other organizations and initiatives to amplify—and not negate or unnecessarily duplicate—the efforts of other contributors	We partner with a number of organisations and cross industry initiatives to deliver FWI and ASOS Foundation programmes. Follow the links for more information.	ASOS Foundation > Ethical Trade Partnerships > Sustainable Sourcing Partnerships > Community Programmes > Inclusion Partnerships > Mind and Body Partnerships >
Take responsibility for the intentional and unintentional effects of funding and have due regard for local customs, traditions, religions, and priorities of pertinent individuals and groups	We always work with established local partners/NGOs to help us design, implement and manage locally and culturally sensitive social and community programmes.	ASOS Foundation > Ethical Trade Partnerships > Sustainable Sourcing Partnerships > Community Programmes >

17. The COP describes advocacy and public policy engagement

UNGC best practices	ASOS Examples	References/links
Publicly advocate the importance of action in relation to one or more UN goals/issues	Some examples from the last year include: <ul style="list-style-type: none"> • Joining TeamPride to promote LGBT acceptance in sport • Publicly supporting the trans equality movement as signatory in Metro newspaper advertisement • Committing to improving gender equality and reducing our Gender Pay Gap • Upholding commitments from the Time to Change Pledge to remove stigma and improve access to mental health support • Developing programmes supporting the Global Framework Agreement with IndustriALL Global trade union 	TeamPride > Trans equality > ASOS Gender Pay Gap Report 2019 > Ethical Trade Programme >
Commit company leaders to participate in key summits, conferences, and other important public policy interactions in relation to one or more UN goals/issues	Senior leaders in the business host and participate in government roundtables and conferences on industry related issues such as modern slavery, the circular fashion economy, sustainability in the fashion industry and due diligence in textile sourcing.	ASOS Modern Slavery House of Lords > ASOS joins Global Fashion Agenda > OECD due diligence in textile sourcing >

18. The COP describes partnerships and collective action

UNGC best practices	ASOS Examples	References/links
Develop and implement partnership projects with public or private organizations (UN entities, government, NGOs, or other groups) on core business, social investments and/or advocacy	We partner with a number of organisations and cross industry initiatives to deliver FWI and ASOS Foundation programmes. Follow the links for more information.	ASOS Foundation > Ethical Trade Partnerships > Sustainable Sourcing Partnerships > Community Programmes > Inclusion Partnerships > Mind and Body Partnerships >
Join industry peers, UN entities and/or other stakeholders in initiatives contributing to solving common challenges and dilemmas at the global and/or local levels with an emphasis on initiatives extending the company's positive impact on its value chain	See above	See above

19. The COP describes CEO commitment and leadership

UNGC best practices	ASOS Examples	References/links
CEO publicly delivers explicit statements and demonstrates personal leadership on sustainability and commitment to the UN Global Compact	Over the last year, ASOS CEO Nick Beighton has: <ul style="list-style-type: none"> • Presented evidence at the UK Government Environmental Audit Committee enquiry into sustainability in the fashion industry • Called on third-party brands to tackle modern slavery at an event at the House of Lords • Addressed suppliers on our Ethical Trade Programme, GFA and modern slavery at ASOS' UK supplier conference 	ASOS Modern Slavery House of Lords > Environmental Audit Committee >
CEO promotes initiatives to enhance sustainability of the company's sector and leads development of industry standards	See above	See above
CEO leads executive management team in development of corporate sustainability strategy, defining goals and overseeing implementation	We are in the process of restructuring how we govern our corporate responsibility programme, Fashion with Integrity. We are forming one Executive level Fashion with Integrity (FWI) governance group, chaired by our CEO. All Executive Directors will participate in this group and be responsible for ensuring FWI is embedded within their functional strategies.	ASOS FWI >

20. The COP describes Board adoption and oversight

UNGC best practices	ASOS Examples	References/links
Board of Directors (or equivalent) assumes responsibility and oversight for long-term corporate sustainability strategy and performance	We are in the process of restructuring how we govern our corporate responsibility programme, Fashion with Integrity. We are forming one Executive level Fashion with Integrity (FWI) governance group, chaired by our CEO. All Executive Directors will participate in this group and be responsible for ensuring FWI is embedded within their functional strategies.	ASOS FWI >
Board establishes, where permissible, a committee or assigns an individual board member with responsibility for corporate sustainability.	See above	See above
Board (or committee), where permissible, approves formal reporting on corporate sustainability (Communication on Progress)	The Executive Board signs off the corporate responsibility section of our Annual Report and formally approves ASOS' Modern Slavery Statement.	ASOS Annual Report 2018 > Modern Slavery Statement >

21. The COP describes stakeholder engagement

UNGC best practices	ASOS Examples	References/links
Publicly recognize responsibility for the company's impacts on internal and external stakeholders	We publicly talk about our impacts on our stakeholders on our corporate responsibility website, in our Annual Report, our Carbon Emissions report and our Modern Slavery Statement.	ASOS Annual Report 2018 > Modern Slavery Statement > ASOS Carbon Emissions Report > Stakeholder Engagement >
Define sustainability strategies, goals and policies in consultation with key stakeholders	<ul style="list-style-type: none"> We regularly consult with stakeholders on the development of key corporate responsibility strategies and policies. Some examples include: Our FWI diversity and inclusion work is carried out in consultation with partners and NGOs including Stonewall, SCOPE, and athletes and staff from the British Paralympics Association. As part of ASOS Third-Party Brands Programme, we are working to facilitate the uptake of sustainable materials by third-party brands that meet our 5MRs. We conducted a purchasing practices assessment with suppliers to help us strengthen our ethical trade programme. We are working together with our carrier partners to develop a platform that will enable us to calculate, track and report on carbon emissions from customer deliveries and returns. 	Stakeholder Engagement > Modern Slavery Statement > Inclusion > Third-Party Brands Programme > Carbon & Energy > ASOS Carbon Emissions Report >
Consult stakeholders in dealing with implementation dilemmas and challenges and invite them to take active part in reviewing performance	We seek to incorporate the views of key stakeholders when designing and reviewing our FWI programmes. Follow the links for further information.	Stakeholder Engagement > Modern Slavery Statement > Inclusion > Mind and Body Partnerships > Environment > Ethical Trade Partnerships > Sustainable Sourcing Partnerships > Community Programmes >
Establish channels to engage with employees and other stakeholders to hear their ideas and address their concerns, and protect 'whistle-blowers'	<p>We have a number of channels in place to engage with key stakeholders:</p> <ul style="list-style-type: none"> Company grievance procedure Whistleblowing helpline 'We're Listening' covering ASOS employees and contractors in ASOS premises For supply chain workers we are trialling a hotline application in Turkey in Turkish and Arabic in conjunction with IndustriALL Global Union, which provides information to workers about their rights and give them access to remedy. 	Modern Slavery Statement >