



# United Nations Global Compact Advanced Communication On Progress

2020 - 2021

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**asos**

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# Chief Operating Officer Statement of Support

Dear Mr. Secretary-General

The UN Global Compact (UNGC) continues to be a driving force in raising global business sustainability standards. We are pleased to further demonstrate our commitment to the UNGC principles in this, our ninth Communication on Progress (COP) – fittingly in the year of COP26 here in the UK.

We have made significant progress in the development of our sustainability programme, Fashion with Integrity (FWI), over the past year. In September, we launched our 2030 Programme – a series of four key overarching goals against which we’ll be focusing our efforts over the next decade, building on our decade of action since launching FWI in 2010.

Our full 2030 programme and the detail on the targets that sit under our goals is available to read here. On page 16 of our report we have mapped our efforts against the Sustainable Development Goals (SDGs), highlighting how each of our focus areas aligns to SDG sub-goals.

Our FWI programme continues to be the vehicle through which we embed each of the UNGC principles within our business strategy, our culture, and our day-to-day operations.

We state our commitment to the UNGC and share all ASOS COP submissions on our public corporate responsibility website, [www.asosplc.com](http://www.asosplc.com). We also provide an index here, showing where stakeholders can find further information about how ASOS supports each of the UNGC principles.

I am proud to endorse ASOS’ continued support of the UNGC and its ten principles with respect to human rights, labour, the environment, and anti-corruption.


**Mat Dunn**  
Chief Operating Officer, ASOS Plc



Mat Dunn, COO, ASOS Plc







The tables below describe examples of the best practices we have adopted under each of the UN Global Compact Advanced Level reporting criteria. They also contain links to where further information can be found and state the related Sustainable Development Goals (SDGs) we are supporting.



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

| UNGC best practices                                                                                                                                                                                                                                    | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | References                                                                                                                                                                       | Related SDGs |
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| 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 have completed a critical assessment of our corporate responsibility programme, Fashion with Integrity (FWI), and how it is governed internally. Led by our Chief Strategy Officer with support from our CEO we have reimagined our FWI programme and set ambitious goals to help us minimise our impact on the planet and deliver positive benefits for people. The process involved key stakeholders from across the business. As part of this new strategy we have implemented a more robust governance framework which allows practitioners and managers of the various goals to report to an ESG committee on a regular basis who in turn report to the board every 6 months. The new goals also form part of the ASOS Executive Team’s objectives which are linked to remuneration. This new governance mechanism ensures we maintain progress and create accountability. | <div>Fashion With IntegrityVIEW</div> <div>ASOS Supply ChainVIEW</div> <div>Modern Slavery StatementVIEW</div> <div>Fashion With Integrity Report 2030 Strategy reportVIEW</div> |              |
| Assign responsibility for corporate sustainability implementation to an individual or group within each business unit and subsidiary.                                                                                                                  | See above                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <div>Fashion With IntegrityVIEW</div>                                                                                                                                            |              |
| Ensure that different corporate functions coordinate closely to maximize performance and avoid unintended negative impacts.                                                                                                                            | See above                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <div>Fashion With IntegrityVIEW</div>                                                                                                                                            |              |

2: The COP describes value chain implementation

| UNGC best practices                                                                                                             | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | References                                                                                                                                           | Related SDGs |
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| Analyse each segment of the value chain carefully, both upstream and downstream, when mapping risks, opportunities and impacts. | <ul style="list-style-type: none"><li>• Our FWI programme oversees our approach to sustainability risk, opportunities and impact management.</li><li>• Our Responsible Sourcing programme covers ASOS Brands and non-stock suppliers.</li><li>• All third-party brands we sell must complete an ethical and sustainable self-assessment questionnaire (SAQs) so we can establish their baseline performance level.</li><li>• Our approach to value chain risk assessment comprises of desk-based research, supply chain mapping, SAQs, auditing and internal and external stakeholder engagement.</li><li>• As a member of Textiles 2030 we calculate the carbon and water impact of each level of the supply chain, to identify and address hotspots.</li></ul> | <div>ASOS Reporting and PoliciesVIEW</div> <div>Modern Slavery StatementVIEW</div> <div>Fashion With Integrity Report 2030 Strategy reportVIEW</div> |              |
| Communicate policies and expectations to suppliers and other relevant business partners                                         | <ul style="list-style-type: none"><li>• ASOS Brands and non-stock suppliers are contractually required to comply with ASOS codes and policies. Follow the Policies links for further information.</li><li>• Third-party brands are required to implement five Minimum Requirements (“5MRs”) on ethical trade and sustainability.</li><li>• Suppliers and supply chain partners are regularly engaged on these policies through training, audits and close relationship management to support them in meeting our standards.</li></ul>                                                                                                                                                                                                                            | <div>ASOS Reporting and PoliciesVIEW</div> <div>Modern Slavery StatementVIEW</div> <div>Fashion With Integrity Report 2030 Strategy reportVIEW</div> |              |

2: The COP describes value chain implementation

| UNGC best practices                                                                                                             | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | References                                                                                                | Related SDGs |
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| Implement monitoring and assurance mechanisms (e.g. audits/screenings) for compliance within the company’s sphere of influence. | <ul style="list-style-type: none"><li>• Our supplier audit programme identifies risk across our tier 1-2 suppliers against our Supplier Ethical Code and local law.</li><li>• Between February 2020 and January 2021, together with third-party auditors, we carried out 332 unannounced audits, giving visibility of working conditions across the tier 1-2 sites in our supply chain. This figure is lower than the previous year due to the impact of COVID-19 on our ability to undertake audits.</li><li>• 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.</li><li>• 40% of our suppliers by volume have carried out an environmental self-assessment to monitor their environmental performance and potential risks</li></ul> | <div>Modern Slavery StatementVIEW</div> <div>Fashion With Integrity Report 2030 Strategy reportVIEW</div> |              |
| Undertake awareness-raising, training and other types of capacity building with suppliers and other business partners.          | <ul style="list-style-type: none"><li>• We run regular tailored conferences, workshops and online webinars and provide training tools for suppliers and partners.</li><li>• We also participate in a number of initiatives aimed at building supplier capacity. Follow the links for further information.</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <div>Modern Slavery StatementVIEW</div> <div>Fashion With Integrity Report 2030 Strategy reportVIEW</div> |              |

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

| UNGC best practices                                                                                                                                                                                                            | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | References                                                                                                                                                                                                             | Related SDGs |
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| <p>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).</p> | <ul style="list-style-type: none"><li>• FWI is continuously being developed in alignment with UN Global Compact, UN Sustainable Development Goals and the United Nations Guiding Principles on Business and Human Rights.</li><li>• All ASOS codes and policies are aligned with internationally-recognised human rights standards, such as the International Labour Organisation Fundamental Conventions.</li><li>• 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.</li></ul> | <div><div>Modern Slavery Statement</div><div>VIEW</div></div> <div><div>Fashion With Integrity Report 2030 Strategy report</div><div>VIEW</div></div>                                                                  |              |
| <p>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>                                                               | <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"><li>• Supplier Ethical Code</li><li>• Child Labour Remediation and Young Worker Policy</li><li>• Contract and Migrant Worker Policy</li><li>• Modern Slavery Statement</li><li>• Homeworker Policy</li><li>• Freedom of Association and Collective Bargaining Policy</li><li>• Accommodation Guidelines (not publicly available)</li></ul>                                                                    | <div><div>ASOS Reporting and Policies</div><div>VIEW</div></div> <div><div>Modern Slavery Statement</div><div>VIEW</div></div> <div><div>Fashion With Integrity Report 2030 Strategy report</div><div>VIEW</div></div> |              |



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

| UNGC best practices                                                                                                                                              | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | References                                                                                                                                                                                       | Related SDGs |
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| Statement of policy stipulating human rights expectations of personnel, business partners and other parties directly linked to operations, products or services. | We have a number of policies stipulating our human rights expectations: <ul style="list-style-type: none"><li>• Supplier Ethical Code</li><li>• Child Labour Remediation and Young Worker Policy</li><li>• Contract and Migrant Worker Policy</li><li>• Modern Slavery Statement</li><li>• Homeworker Policy</li><li>• Freedom of Association and Collective Bargaining Policy</li><li>• Accommodation Guidelines (not publicly available)</li><li>• Third Party Brands minimum requirements</li></ul> | <div>ASOS Reporting and PoliciesVIEW</div> <div>Third-Party Brands ProgrammeVIEW</div> <div>Modern Slavery StatementVIEW</div> <div>Fashion With Integrity Report 2030 Strategy reportVIEW</div> |              |
| Statement of policy publicly available and communicated internally and externally to all personnel, business partners and other relevant parties.                | Our policies and statements are 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 (covid permitting).                                                                                                                                                                                       | <div>ASOS Reporting and PoliciesVIEW</div>                                                                                                                                                       |              |

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

| UNGC best practices                                                                                      | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | References                                                                                                                                       | Related SDGs |
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| Process to ensure that internationally recognized human rights are respected.                            | <ul style="list-style-type: none"><li>• 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.</li><li>• 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.</li></ul>                                     | <div>Third-Party Brands ProgrammeVIEW</div> <div>Fashion With Integrity Report 2030 Strategy reportVIEW</div>                                    |              |
| On-going due diligence process that includes an assessment of actual and potential human rights impacts. | <ul style="list-style-type: none"><li>• ASOS' approach to risk assessment comprises of desk-based research, supply chain mapping, auditing and stakeholder engagement to assess actual and potential human rights impacts.</li><li>• Our audit programme identifies risk across our tier 1-2 suppliers against our Supplier Ethical Code and local law.</li><li>• 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.</li></ul> | <div>Modern Slavery StatementVIEW</div> <div>Fashion With Integrity Report 2030 Strategy reportVIEW</div>                                        |              |
| Internal awareness-raising and training on human rights for management and employees.                    | <ul style="list-style-type: none"><li>• ASOS CEO and Executive Directors are engaged in discussions on human rights and are involved in strategic decision making on a quarterly basis.</li><li>• 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.</li></ul>                                                                                                                              | <div>Ethical Trade ProgrammeVIEW</div> <div>Modern Slavery StatementVIEW</div> <div>Fashion With Integrity Report 2030 Strategy reportVIEW</div> |              |

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

| UNGC best practices                                                                                | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | References                                                                                                                                                                                          | Related SDGs |
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| Allocation of responsibilities and accountability for addressing human rights impacts.             | <ul style="list-style-type: none"><li>• The Chief Executive and ASOS Executive Board are responsible for ensuring ASOS meets its human rights responsibilities.</li><li>• We have our own team of 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.</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <div>Ethical Trade Programme <a href="#">VIEW</a></div> <div>Modern Slavery Statement <a href="#">VIEW</a></div> <div>Fashion With Integrity Report 2030 Strategy report <a href="#">VIEW</a></div> |              |
| 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"><li>• Company grievance procedure covering ASOS employees and contractors in ASOS premises</li><li>• Spot, an independent 24/7 whistleblowing service that employees can use to raise problems and report concerns, completely anonymously and confidential with no repercussions. Reports raised via Spot are investigated by the General Counsel and the Business Assurance Manager</li><li>• We operate 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.</li><li>• We’ve helped establish a trade-union-based Migrant Resource Centre (MRC) in Mauritius, through which workers are able to file complaints and grievances about their working conditions in a way that doesn’t put them at risk of repercussions from their employers</li></ul> | <div>Modern Slavery Statement <a href="#">VIEW</a></div> <div>ASOS Business Integrity <a href="#">VIEW</a></div>                                                                                    |              |



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

| UNGC best practices                                                                                                                     | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | References                                                                                                           | Related SDGs |
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| Internal decision-making, budget and oversight for effective responses to human rights impacts.                                         | <ul style="list-style-type: none"><li>• We have processes and budgets in place to respond to and remediate human rights impacts.</li><li>• Depending on the severity of the impact we involve a number of key internal decision makers, including, when required, the Executive Board.</li><li>• 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.</li></ul>                                                                         | <div>Modern Slavery StatementVIEW</div>                                                                              |              |
| 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"><li>• We continue to build local NGO and Trade Union partnerships in order to monitor and deliver effective remediation of any adverse human rights impacts.</li><li>• We have a critical friend 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.</li><li>• The ASOS Child Labour, Remediation and Young Worker policy sets out the steps to remedy the discovery of child labour in our supply chain.</li></ul> | <div>Modern Slavery StatementVIEW</div> <div>Child Labour PolicyVIEW</div> <div>Ethical Trade PartnershipsVIEW</div> |              |

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

| UNGC best practices                                                                                                                                                                                               | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | References                                                                                                                                                           | Related SDGs |
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| 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"><li>• We are actively involved with a range of organisations and initiatives. Read our Modern Slavery Statement to find out more.</li><li>• We have signed a Global Framework Agreement with IndustriALL Global Union, representing a strong framework for implementing freedom of association and other labour rights.</li><li>• We hold regular workshops and events to establish collaboration between third-party brands, including on purchasing practices, Uyghur forced labour, and UK specific modern slavery risks.</li></ul> | <div>Ethical Trade ProgrammeVIEW</div> <div>Ethical Trade PartnershipsVIEW</div> <div>Modern Slavery StatementVIEW</div> <div>Third-Party Brands ProgrammeVIEW</div> |              |

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

| UNGC best practices                                                                                                                                              | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | References                                                                                                                                                                                                            | Related SDGs |
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| <p>System to monitor the effectiveness of human rights policies and implementation with quantitative and qualitative metrics, including in the supply chain.</p> | <ul style="list-style-type: none"><li>Partnerships are integral for ASOS in addressing modern slavery risks. We continue to build local NGO and trade union partnerships in order to monitor the implementation and effectiveness of human rights policies.</li><li>We have established our own benchmarking standards to assess third-party brands Modern Slavery Statements against section 54 of UK Modern Slavery Act.</li><li>We operate in line with our Supplier Ethical Code, based on the ETI Base Code and ILO Fundamental Conventions, and thus defines the minimum standards we require from our suppliers.</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <div><div>Modern Slavery Statement</div><div>VIEW</div></div> <div><div>Supplier Ethical Code</div><div>VIEW</div></div> <div><div>Fashion With Integrity Report 2030 Strategy report</div><div>VIEW</div></div>      |              |
| <p>Monitoring drawn from internal and external feedback, including affected stakeholders.</p>                                                                    | <ul style="list-style-type: none"><li>We conduct purchasing practices assessments with our retail teams and suppliers and use the findings to inform improvements and training.</li><li>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.</li><li>We regularly engage with suppliers to address challenges in implementing labour standards at the factory level. One example is our ongoing work in Mauritius to support ethical migrant labour recruitment practices, build trade union capacity and provide workers with access to grievance mechanisms, with funding granted from the UK Government’s Modern Slavery Innovation Fund.</li><li>We partner with credible international stakeholders, for example Anti-Slavery International and IndustriALL Global Union to seek further independent feedback to inform strategy.</li><li>We respond to any media and NGO reports and are committed to incorporating advised actions and recommendations to reduce country specific risk.</li></ul> | <div><div>Fashion Transparency Index</div><div>VIEW</div></div> <div><div>Modern Slavery Statement</div><div>VIEW</div></div> <div><div>Fashion With Integrity Report 2030 Strategy report</div><div>VIEW</div></div> |              |



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

| UNGC best practices                                                                                             | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | References                                                                                                                                                                                                                           | Related SDGs |
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| Leadership review of monitoring and improvement results.                                                        | <ul style="list-style-type: none"><li>• We report Sourcing, Ethical Trade, Sustainability and Branded Responsible Sourcing performance to the Executive Board on a quarterly basis.</li><li>• To ensure effective delivery of the Fashion with Integrity 2030 strategy, we will measure progress against the 2030 goals in leadership objectives and increase our focus on sustainability alongside business outcomes in reviews. This is already part of the CEO’s incentive arrangements, and from FY22 the wider ASOS executive team will each be set relevant FWI-linked objectives, which will impact their remuneration.</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <div>Modern Slavery StatementVIEW</div> <div>Fashion With Integrity Report 2030 Strategy reportVIEW</div>                                                                                                                            |              |
| Process to deal with incidents the company has caused or contributed to for internal and external stakeholders. | <ul style="list-style-type: none"><li>• We continue to build local NGO and Trade Union partnerships in order to monitor and deliver effective remediation of adverse human rights impacts. Since 2017, we have partnered with Anti Slavery International, which acts as our ‘critical friend’, helping to ensure that our human rights due diligence process is robust and that we’re continuously reviewing and mitigating risks in our supply chain.</li><li>• ASOS’ audit and ‘beyond audit’ approach sets out high ethical standards against our Supplier Ethical Code and national legislation, ensuring thorough assessments and support to our suppliers to help remediate any issues found. All of ASOS’ UK factories (tier 1&amp;2) are audited using Fast Forward, which was developed to address UK-specific issues.</li><li>• We use a combination of our own in-country teams and third-party audit providers to identify risk at factory level against our policies and indicators of modern slavery. This enables our head office and in-country teams to take immediate action and mitigate risk across our supply chain.</li><li>• The ASOS Child Labour, Remediation and Young Worker policy sets out the steps to remedy the discovery of child labour in our supply chain.</li></ul> | <div>Modern Slavery StatementVIEW</div> <div>Child Labour PolicyVIEW</div> <div>Remediation and Young Worker PolicyVIEW</div> <div>Supplier Ethical CodeVIEW</div> <div>Fashion With Integrity Report 2030 Strategy reportVIEW</div> |              |

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

| UNGC best practices                                                                                                                                                                         | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | References                                                                                                                                                                                                                                                                                                                                                                           | Related SDGs |
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| <p>Grievance mechanisms that are legitimate, accessible, predictable, equitable, transparent, rights compatible, a source of continuous learning, and based on engagement and dialogue.</p> | <p>We have a number of formal and informal feedback mechanisms across our operations:</p> <ul style="list-style-type: none"><li>• Newly developed in 2021, our Freedom of Association and Collective Bargaining Policy expands on the freedom of association requirements outlined in our Supplier Ethical Code and recognises the role of freedom of association and collective bargaining as being fundamental for the realisation of other labour rights, setting out supplier requirements to ensure this right is protected.</li><li>• Company grievance procedure and whistleblowing policy - covering ASOS employees and contractors in ASOS premises. Through our independent, third-party whistleblowing service, Spot, anyone connected to ASOS can share concerns about the business through a website portal. Reports raised via Spot are investigated by the General Counsel and the Business Assurance Manager. The Audit Committee is advised of any significant concerns raised through this service and subsequent investigations, while the Board has oversight of investigations of serious wrongdoing and is responsible for reviewing and approving our Whistleblowing Policy and processes.</li><li>• We operate 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.</li><li>• In Mauritius we have developed a smartphone app and pre-departure training for workers considering migration to Mauritius to support ethical recruitment. We've also established a trade-union-based support centre for migrant workers in Mauritius, providing grievance advice and case management.</li></ul> | <div><div>Modern Slavery Statement</div><div>VIEW</div></div> <div><div>ASOS Business Integrity</div><div>VIEW</div></div> <div><div>Global Framework Agreement</div><div>VIEW</div></div> <div><div>ASOS Freedom of Association and Collective Bargaining Policy</div><div>VIEW</div></div> <div><div>Fashion With Integrity Report 2030 Strategy report</div><div>VIEW</div></div> |              |

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

| UNGC best practices                                                                                                                                            | ASOS Examples                                                                                                                                                 | References                                                                                                | Related SDGs |
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| 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 report on outcomes and impacts of actions taken to address and remediate human rights abuses in our supply chain. | <div>Modern Slavery StatementVIEW</div> <div>Fashion With Integrity Report 2030 Strategy reportVIEW</div> |              |



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

| UNGC best practices                                                                                                                                     | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | References                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Related SDGs |
|---------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|
| Reference to principles of relevant international labour standards (ILO Conventions) and other normative international instruments in company policies. | <ul style="list-style-type: none"><li>ASOS Brands and non-stock suppliers are contractually required to comply with ASOS codes and policies.</li><li>These include: ASOS Supplier Ethical Code, Freedom of Association and Collective Bargaining Policy, Child Labour Remediation and Young Worker Policy, Migrant and Contract Worker Policy, Homeworker Policy, Migrant Worker Guidelines Accommodation Guidelines (not publicly available)</li><li>ASOS supports third-party brands to develop their own Ethical Code to establish standards in their supply chains, in line with internationally recognised labour and human rights standards.</li></ul> | <div>ASOS Reporting and PoliciesVIEW</div> <div>Modern Slavery StatementVIEW</div> <div>Third-Party Brands ProgrammeVIEW</div> <div>Homeworking PolicyVIEW</div> <div>Supplier Ethical CodeVIEW</div> <div>Child Labour Remediation and Young Worker PolicyVIEW</div> <div>Migrant and Contract Labour PolicyVIEW</div> <div>Freedom of Association and Collective Bargaining PolicyVIEW</div> <div>Fashion With Integrity Report 2030 Strategy reportVIEW</div> |              |

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

| UNGC best practices                                                                                                                                                                                                                                                | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | References                                                                                                                                                                                                                                                                                                                                                                                                                              | Related SDGs |
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| Reflection on the relevance of the labour principles for the company.                                                                                                                                                                                              | <ul style="list-style-type: none"><li>Our Modern Slavery Statements reflect on the relevance of labour principles to our business.</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <div>Modern Slavery Statement</div> <div>VIEW</div>                                                                                                                                                                                                                                                                                                                                                                                     |              |
| 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"><li>Supplier Ethical Code</li><li>Child Labour Remediation and Young Worker Policy</li><li>Migrant and Contract Labour Policy</li><li>Homeworker Policy (not publicly available)</li><li>Accommodation Guidelines (not publicly available)</li><li>Migrant Worker Guidelines</li><li>Freedom of Association and Collective Bargaining Policy</li><li>We have signed a Global Framework Agreement with IndustriALL Global Union, representing a strong framework for implementing freedom of association and other labour rights.</li></ul> | <div>ASOS Reporting and Policies</div> <div>VIEW</div> <div>ASOS GFA with IndustriALL</div> <div>VIEW</div> <div>Supplier Ethical Code</div> <div>VIEW</div> <div>Child Labour Remediation and Young Worker Policy</div> <div>VIEW</div> <div>Migrant and Contract Labour Policy</div> <div>VIEW</div> <div>Freedom of Association and Collective Bargaining Policy</div> <div>VIEW</div> <div>Homeworking Policy</div> <div>VIEW</div> |              |

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



| UNGC best practices                                                                                                                                                 | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | References                                                                                                                                                                                                                                                               | Related SDGs |
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| 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"><li>• Supplier Ethical Code</li><li>• Child Labour Remediation and Young Worker Policy</li><li>• Migrant and Contract Labour Policy</li><li>• Homeworker Policy (not publicly available)</li><li>• Freedom of Association and Collective Bargaining Policy</li><li>• Accommodation Guidelines (not publicly available)</li><li>• ASOS requires all new third-party brands to meet our 5MRs at the onboarding stage.</li></ul> | <div>ASOS Reporting and PoliciesVIEW</div> <div>Supplier Ethical CodeVIEW</div> <div>Child Labour Remediation and Young Worker PolicyVIEW</div> <div>Migrant and Contract Labour PolicyVIEW</div> <div>Freedom of Association and Collective Bargaining PolicyVIEW</div> |              |



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

| UNGC best practices                                                                                                                                                                                                                                                                                                                                                                                                    | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | References                                                                                                                                                                                                                                                                                                                                                                                                | Related SDGs |
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| <p>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.</p> | <ul style="list-style-type: none"><li>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.</li><li>Our Supplier Ethical Code details specific commitments and Human Resources policies every supplier must comply</li><li>Our Fashion with Integrity 2030 Strategy report outlines our commitment for an inclusive and supportive environment for all people, and have programmes in place to drive diversity, equity and inclusion across the business.</li><li>We've signed up to the Business in the Community Race at Work Charter, built diversity and inclusion objectives into our executive team's objectives.</li><li>Our 'Race Equality Heads and Hearts Group' has celebrated its first anniversary.</li><li>We published our Ethnicity Pay Gap data (EPG) for the first time, alongside our Gender Pay Gap data, as part of our drive for transparency and inclusivity at ASOS.</li><li>We launched four new gender-neutral policies for UK ASOSers around major life events – pregnancy-loss, reproductive health, exceptional health-related leave and menopause.</li><li>We've signed up to the Government's Disability Confident scheme to continue our journey to becoming a truly Disability Confident Committed employer.</li><li>We've established a dedicated LGBTQ+ workplace equality network, providing specific wellbeing resources for our LGBTQ+ colleagues and running regular education and awareness sessions for all our people.</li></ul> | <div><div>ASOS Reporting and Policies</div><div>VIEW</div></div> <div><div>ASOS GFA with IndustriALL</div><div>VIEW</div></div> <div><div>Ethnicity and Gender Pay Gap Report 2021</div><div>VIEW</div></div> <div><div>Inclusion</div><div>VIEW</div></div> <div><div>ASOS Foundation</div><div>VIEW</div></div> <div><div>Fashion With Integrity Report 2030 Strategy report</div><div>VIEW</div></div> |              |

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

| UNGC best practices                                                                                                                                                                                                                                                             | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                         | References                                                                                                                                            | Related SDGs                                                                          |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|
| Continued...                                                                                                                                                                                                                                                                    | <ul style="list-style-type: none"><li>• We're proud members of the cross-industry network Inclusive Companies, and are pleased to be working with them to help us on our journey to being the most inclusive ASOS we can be.</li><li>• The 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.</li></ul> |                                                                                                                                                       |                                                                                       |
| 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). | <p>We participate in a number of initiatives to collaboratively address labour standard challenges.</p> <p>Partnerships are integral for ASOS in addressing modern slavery risks. Please follow the Modern Slavery Statement link for information on the key organisations and initiatives we partner with.</p>                                                                                                                                       | <div><div>Modern Slavery Statement</div><div>VIEW</div></div> <div><div>Fashion With Integrity Report 2030 Strategy report</div><div>VIEW</div></div> |   |
| Structural engagement with a global union, possibly via a Global Framework Agreement.                                                                                                                                                                                           | <p>We have signed a Global Framework Agreement with IndustriALL, representing a strong framework for implementing freedom of association and other labour rights.</p>                                                                                                                                                                                                                                                                                 | <div><div>ASOS GFA with IndustriALL</div><div>VIEW</div></div>                                                                                        |  |

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

| UNGC best practices                               | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | References                                                                                                                                      | Related SDGs |
|---------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|--------------|
| Risk and impact assessments in the area of labour | <ul style="list-style-type: none"><li>• We have currently mapped by address 90% of our ASOS Tier 4 fabric mill supply chain. We will continue our journey to extend to all Suppliers of Trims and Components. By mapping our supply chain to Tiers 4 and 5, the material level, will give us greater understanding of where we can drive impact, enabling us to make better material choices. As part of our commitment to transparency and to keep us fully accountable to our customers and our stakeholders, from next year we'll publish regular updates on our fibre mix to encourage external scrutiny.</li><li>• Our Fashion with Integrity 2030 Strategy outlines our goals and commitments in relation to mapping our supply chain. Including 100% of ASOS own-brand products will have supply chains mapped to raw material level by 2030, extending our existing supply chain mapping.</li><li>• Our audit programme identifies risk across our tier 1-2 suppliers against our Supplier Ethical Code and local law. We carried out 332 unannounced audits between February 2020 and January 2021. Due to the pandemic, we have been unable to meet our target of auditing all tier 1 and 2 sites globally in 2020.</li><li>• We maintain frequent contact with our suppliers to make sure any outstanding corrective actions found during audits are resolved.</li><li>• We have also partnered with international / external stakeholders, e.g. Anti-Slavery International and IndustriALL Global Union, while continuing to build local NGO and Trade Union partnerships to monitor and deliver effective remediation of adverse human rights impacts.</li><li>• We publish a Modern Slavery Statement annually.</li></ul> | <div>Modern Slavery StatementVIEW</div> <div>Fashion With Integrity Report 2030 Strategy reportVIEW</div> <div>Reporting and PoliciesVIEW</div> |              |

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

| UNGC best practices                                                                                                   | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | References                                                                                                                                                                                      | Related SDGs |
|-----------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|
| Continued...                                                                                                          | <ul style="list-style-type: none"><li>• We have developed ethical trading policies and mitigation strategies to protect vulnerable workers across our supply chain. Third-party brands are required to implement five Minimum Requirements (“5MRs”) on ethical trade and sustainability. Suppliers and supply chain partners are also regularly engaged with our policies through training, audits and close relationship management to support them meeting our standards.</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                 |              |
| Dialogue mechanism with trade unions to regularly discuss and review company progress in addressing labour standards. | <ul style="list-style-type: none"><li>• We have signed a Global Framework Agreement with IndustriALL Global Union, representing a strong framework for implementing freedom of association and other labour rights.</li><li>• We have supported trade union capacity building in Mauritius, in collaboration with our local affiliate IndustriALL Global Union.</li><li>• 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.</li><li>• This year, we signed a ‘Charter for Enhanced Relations’ with Community Trade Union. This commits us to enhancing our existing constructive relationship with Community with the joint objective of maintaining and enhancing good employment practices and industrial relations across our UK fulfilment sites at Barnsley and Lichfield.</li></ul> | <div><div>ASOS GFA with IndustriALL</div><div>VIEW</div></div> <div><div>ACT</div><div>VIEW</div></div> <div><div>Fashion With Integrity Report 2030 Strategy report</div><div>VIEW</div></div> |              |



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

| UNGC best practices                                                                            | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | References                                                                                                | Related SDGs |
|------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|--------------|
| Allocation of responsibilities and accountability within the organization.                     | <ul style="list-style-type: none"><li>• The Chief Executive and ASOS Executive Board are responsible for ensuring ASOS meets its human rights responsibilities. They are supported by the Corporate Responsibility, Ethical Trade and Sourcing teams.</li><li>• To ensure effective delivery of our Fashion With Integrity 2030 programme, we will measure progress against the 2030 goals in leadership objectives and increase our focus on sustainability alongside business outcomes in reviews. From this year the wider ASOS executive team will each be set relevant FWI-linked objectives, which will impact their remuneration.</li><li>• We have a team of 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.</li></ul> | <div>Modern Slavery StatementVIEW</div> <div>Fashion With Integrity Report 2030 Strategy reportVIEW</div> |              |
| Internal awareness-raising and training on the labour principles for management and employees. | <ul style="list-style-type: none"><li>• ASOS CEO and Executive Directors are engaged in discussions on human rights and are involved in strategic decision making on a quarterly basis.</li><li>• 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.</li><li>• We train our retail employees on our Responsible Sourcing programme, responsible purchasing practices, and respectful and collaborative supplier relationships.</li><li>• 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.</li><li>• Buyers are also made aware of suppliers' corrective action plans so they can help support us in driving improvements.</li></ul>                                     | <div>Modern Slavery StatementVIEW</div> <div>Fashion With Integrity Report 2030 Strategy reportVIEW</div> |              |

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

| UNGC best practices                                                    | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | References                                                                                                                                            | Related SDGs |
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| Active engagement with suppliers to address labour-related challenges. | <ul style="list-style-type: none"><li>• We run tailor made supplier conferences in our key sourcing destinations. As of this year, our supplier roadshows have been virtual due to the pandemic</li><li>• In September 2020, we hosted a virtual event for all brands to whom UK requirements apply. Representatives from the Transparency Pledge coalition and the Fast Forward programme joined the event to introduce their initiatives and answer questions from brands.</li><li>• In November 2020, we organised a Q&amp;A session with Human Rights Watch to provide further guidance on how to sign and align with the Transparency Pledge.</li><li>• In December 2020, we hosted two virtual workshops for our 13 brands who signed the Modern Slavery Pledge in 2019. In the first workshop, Anti-Slavery International delivered an in-depth presentation about forced labour of the Uyghur people in Xinjiang and risks posed to the fashion industry. The second workshop, supported by ACT, focused on purchasing practices.</li><li>• We participate in a number of initiatives aimed at building supplier capacity. Follow the links for further information.</li></ul> | <div><div>Modern Slavery Statement</div><div>VIEW</div></div> <div><div>Fashion With Integrity Report 2030 Strategy report</div><div>VIEW</div></div> |              |

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

| UNGC best practices                                                                                                                                                                                                                                                       | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | References                                                                                                                                                                                                                                                                                                              | Related SDGs |
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| <p>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.</p> | <ul style="list-style-type: none"><li>● Newly developed in 2021, our Freedom of Association and Collective Bargaining Policy expands on the freedom of association requirements outlined in our Supplier Ethical Code and recognises the role of freedom of association and collective bargaining as being fundamental for the realisation of other labour rights, setting out supplier requirements to ensure this right is protected.</li><li>● We operate 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. As of January 2021, the app had been downloaded 6,804 times. The ‘my rights’ section has been clicked 8,498 times. We plan on expanding this to other regions in the future.</li><li>● In Mauritius we have developed a smartphone app and pre-departure training for workers considering migration to Mauritius to support ethical recruitment. We’ve also established a trade-union-based support centre for migrant workers in Mauritius, providing grievance advice and case management.</li></ul> | <div><div>Modern Slavery Statement</div><div>VIEW</div></div> <div><div>Global Framework Agreement</div><div>VIEW</div></div> <div><div>ASOS Freedom of Association and Collective Bargaining Policy</div><div>VIEW</div></div> <div><div>Fashion With Integrity Report 2030 Strategy report</div><div>VIEW</div></div> |              |

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

| UNGC best practices                                                                                                                                              | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | References                                                                                                                                                            | Related SDGs |
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| 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.                                                                                                                                                                                                                                                                                                                                                                           | <div><div>Fashion With Integrity Report 2030 Strategy report</div><div>VIEW</div></div> <div><div>Modern Slavery Statement</div><div>VIEW</div></div>                 |              |
| 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"><li>• We have signed a Global Framework Agreement with IndustriALL Global Union, representing a strong framework for implementing freedom of association and other labour rights.</li><li>• Through our ACT membership, we review progress in addressing labour standards and jointly identify priorities for the future.</li><li>• 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.</li></ul>                                                 | <div><div>Modern Slavery Statement</div><div>VIEW</div></div> <p>See pp.32-34 of our Modern Slavery Statement for our Collaborations and Stakeholder Engagements.</p> |              |
| 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"><li>• We have mapped tiers 1 to 3 of our supply chain and partially mapped tiers 4 and 5.</li><li>• Our audit programme identifies risk across our tier 1-2 suppliers against our Supplier Ethical Code and local law. During the last financial year, we carried out 332 unannounced audits. This figure is lower than the previous year due to the impact of COVID-19 on our ability to undertake audits.</li><li>• 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.</li></ul> | <div><div>Fashion With Integrity Report 2030 Strategy report</div><div>VIEW</div></div> <div><div>Modern Slavery Statement</div><div>VIEW</div></div>                 |              |



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

| UNGC best practices                                                                                                                                                                          | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | References                                                                                                                                                                                                                                                    | Related SDGs |
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| <p>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.</p> | <ul style="list-style-type: none"><li>• All of our UK (tier 1 &amp; 2) factories are part of the 'Fast Forward' programme. This is a continuous improvement programme which involves pre-audit training and access to guidance and resources to support supply chain businesses to achieve and improve the ethical treatment of their workers and collaborative working amongst the brands involved.</li><li>• We participate in a number of initiatives aimed at improving ethical supply chain practices. Follow the links for further information.</li></ul> | <div><div>Fashion With Integrity Report 2030 Strategy report</div><div>VIEW</div></div> <div><div>Modern Slavery Statement</div><div>VIEW</div></div> <p>See pp.32-34 of our Modern Slavery Statement for our Collaborations and Stakeholder Engagements.</p> |              |
| <p>Outcomes of integration of the Labour principles [report main incidences].</p>                                                                                                            | <p>Our Modern Slavery Statements transparently report on outcomes and impacts of actions taken to address and remediate labours standard violations in our supply chain.</p>                                                                                                                                                                                                                                                                                                                                                                                    | <div><div>Modern Slavery Statement</div><div>VIEW</div></div>                                                                                                                                                                                                 |              |

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

| UNGC best practices                                                                                            | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | References                                                                                                                                                                         | Related SDGs |
|----------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|
| Written company policy on environmental stewardship.                                                           | <ul style="list-style-type: none"><li>• We have a publicly available overarching Environmental Policy.</li><li>• Other relevant codes include: ASOS Supplier Ethical Code, Wood and Wood Pulp Policy, ASOS Chemical policy and Restricted Substance List (RSL), ASOS Cotton Sourcing Policy, Animal Derived Materials Policy.</li></ul>                                                                                                                                                                                                                                                                   | <div>ASOS Environmental PolicyVIEW</div> <div>ASOS Reporting and PoliciesVIEW</div> <div>Animal Derived Material PolicyVIEW</div>                                                  |              |
| Inclusion of minimum environmental standards in contracts with suppliers and other relevant business partners. | <ul style="list-style-type: none"><li>• 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, Animal Derived Materials Policy.</li><li>• As part of our third party-brands programme we have five minimum requirements ('5MR') we expect all brands to be compliant with, including relevant chemical legislation and animal welfare policy implementation.</li></ul> | <div>ASOS Reporting and PoliciesVIEW</div> <div>Sustainable Sourcing ProgrammeVIEW</div> <div>Third-Party Brands ProgrammeVIEW</div> <div>Animal Derived Material PolicyVIEW</div> |              |

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



| UNGC best practices                                 | ASOS Examples                                                                                                                                | References                                                                                                              | Related SDGs |
|-----------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|--------------|
| Specific commitments and goals for specified years. | Follow the links for a comprehensive list of our environment and sustainable sourcing commitments and our performance against these targets. | <div>ASOS_AR2021<br/>(asosplc.com)<div>VIEW</div></div> <div>ASOS Carbon Emissions<br/>Report 2021<div>VIEW</div></div> |              |

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

| UNGC best practices                                                                              | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | References                                                                                                                                        | Related SDGs |
|--------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------|--------------|
| Environmental risk and impact assessments.                                                       | <p>We undertake the following risk and impact assessments:</p> <p><b>Business operations:</b></p> <ul style="list-style-type: none"><li>• Carbon footprint assessment of business operations</li><li>• Renewable energy generation assessments</li></ul> <p><b>Supply chain:</b></p> <ul style="list-style-type: none"><li>• Delivery GHG emissions assessments</li><li>• Calculation of ASOS carbon, water and waste footprint since 2012 using SCAP tool, now known as Textiles 2030.</li><li>• Environmental impact assessment of our apparel supply chain through Sustainable Apparel Coalition’s Higg Index FEM (Tier 1-5)</li><li>• Due diligence screening and testing to ensure compliance with our chemical policy and Restricted Substances List.</li><li>• Supplier scorecards provide buyers with a summary of a supplier’s sustainability data to inform their sourcing decisions.</li></ul> | <p><b>Corporate Responsibility – ASOS plc</b> <a href="#">VIEW</a></p> <hr/> <p><b>ASOS Carbon Emissions Report 2021</b> <a href="#">VIEW</a></p> |              |
| Assessments of lifecycle impact of products, ensuring environmentally sound management policies. | <ul style="list-style-type: none"><li>• We use the Sustainable Apparel Coalition’s Higg Index FEM to assess the environmental impact of our supply chain.</li><li>• We use the SCAP/T2030 tool to measure our water, carbon, and waste impacts, measuring how these impacts reduce through fibre switching.</li><li>• We have developed guidelines and requirements for all designers, buying and garment tech, developed with the Centre for Sustainable Fashion. Also available publicly.</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                     | <p><b>Corporate Responsibility – ASOS plc</b> <a href="#">VIEW</a></p> <hr/> <p><b>Circular Design Guidebook</b> <a href="#">VIEW</a></p>         |              |



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

| UNGC best practices                                                                                | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | References                                                                                                          | Related SDGs                                                                          |
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| Continued...                                                                                       | <ul style="list-style-type: none"><li>• We manage our Denim range using the EIM scoring system.</li><li>• 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.</li><li>• As part of our circular fashion system commitment we are incorporating a circular approach to sourcing materials and packaging.</li></ul>            |                                                                                                                     |                                                                                       |
| 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 Corporate Responsibility, Ethical Trade, Sustainability, Fabric, Product Technical and Sourcing teams.                                                                                                                                                                                                                                      |                                                                                                                     |   |
| 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"><li>• Retail training: sustainable sourcing, animal welfare, chemical management, circular fashion and sustainable raw materials</li><li>• Launched new Fashion with Integrity strategy to the business, including series of events and seminars to promote and discuss the new strategy.</li><li>• Trained commercial teams on the circular design guidelines.</li></ul> | <div>ASOS Reporting and Policies<div>VIEW</div></div> <div>Corporate Responsibility – ASOS plc<div>VIEW</div></div> |  |



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

| UNGC best practices                                                                                                                                                          | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | References                                                                                                                 | Related SDGs |
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| 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"><li>• Company grievance procedure</li><li>• Spot, an independent 24/7 whistleblowing service that employees can use to raise problems and report concerns, completely anonymously and confidential with no repercussions. Reports raised via Spot are investigated by the General Counsel and the Business Assurance Manager</li><li>• We raise awareness of these mechanisms through internal communications channels including social media, screens, workshops, online videos, conferences and the Employee Forum.</li></ul> | <div><div>Modern Slavery Statement</div><div>VIEW</div></div> <div><div>ASOS Business Integrity</div><div>VIEW</div></div> |              |

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



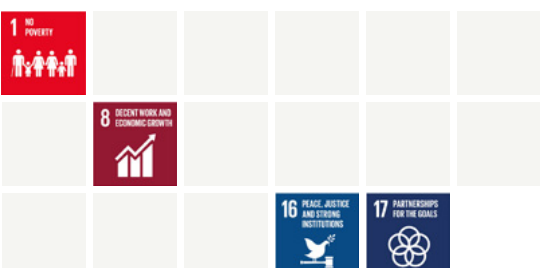
| UNGC best practices                                                                | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | References                                                                                                                                                                                                       | Related SDGs |
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| System to track and measure performance based on standardized performance metrics. | <p>We use a number of systems to track environmental performance:</p> <p><b>Business operations:</b></p> <ul style="list-style-type: none"><li>• Annual carbon emissions report for operations.</li><li>• Regular tracking and benchmarking of carbon dioxide emissions from delivery partners.</li><li>• Energy management system, Fariq, to monitor consumption at all major sites.</li></ul> <p><b>Supply chain:</b></p> <ul style="list-style-type: none"><li>• Close engagement with our packaging and third-party logistics companies to remove unnecessary plastic or other materials from mail and transit packaging.</li><li>• FEM Higg Index to track sustainability performance of our supply chain.</li><li>• Using EIM tool to assess impact of Denim.</li><li>• SCAP's/ Textiles 2030 assessment tool to calculate ASOS products' environmental footprint.</li><li>• Sustainable cotton tracker to track the use of sustainable cotton.</li><li>• Interlink to evaluate suppliers' chemical compliance.</li></ul> | <div><div>ASOS Carbon Emissions Report 2021</div><div>VIEW</div></div> <div><div>ASOS Reporting and Policies</div><div>VIEW</div></div> <div><div>Corporate Responsibility – ASOS plc</div><div>VIEW</div></div> |              |

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


| UNGC best practices                                                                                          | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | References                                                                                                                                                                                                 | Related SDGs                                                                         |
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| Leadership review of monitoring and improvement results.                                                     | We regularly report environmental and sustainability performance to the Executive Directors.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                            |   |
| Audits or other steps to monitor and improve the environmental performance of companies in the supply chain. | <p>We use a number of systems to track environmental performance:</p> <p><b>Business operations:</b></p> <ul style="list-style-type: none"><li>• Annual carbon emissions report for operations.</li><li>• Regular tracking and benchmarking of carbon dioxide emissions from delivery partners.</li><li>• Energy management system, Fabriq, to monitor consumption at all major sites.</li></ul> <p><b>Supply chain:</b></p> <ul style="list-style-type: none"><li>• Close engagement with our packaging and third-party logistics companies to remove unnecessary plastic or other materials from mail and transit packaging.</li><li>• FEM Higg Index to track sustainability performance of our supply chain.</li><li>• Use EIM tool for denim.</li><li>• SCAP’s assessment tool to calculate ASOS Brands products’ environmental footprint (aka Textile2030).</li><li>• Track the use of sustainable cotton fibres.</li><li>• Interlink to evaluate suppliers’ chemical compliance.</li></ul> | <p><b>ASOS Carbon Emissions Report 2021</b> <a href="#">VIEW</a></p> <p><b>ASOS Reporting and Policies</b> <a href="#">VIEW</a></p> <p><b>Corporate Responsibility – ASOS plc</b> <a href="#">VIEW</a></p> |  |





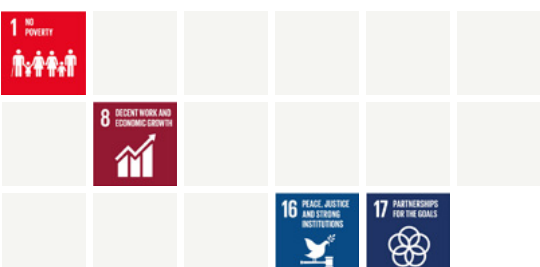
12: The COP describes robust commitments, strategies or policies in the area of anti-corruption

| UNGC best practices                                                                                                                                    | ASOS Examples                                                                                                                                                                                                                                                                                                                    | References                                                                                                                                                                          | Related SDGs                                                                          |
|--------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|
| Publicly stated formal policy of zero-tolerance of corruption.                                                                                         | <p>The following ASOS codes state our policy of zero tolerance of corruption:</p> <ul style="list-style-type: none"><li>• Do the Right Thing – Code of Integrity (provided to all business partners and suppliers but not publicly available)</li><li>• Gifts &amp; Hospitality Policy</li><li>• Supplier Ethical Code</li></ul> | <p>ASOS Business Integrity <a href="#">VIEW</a></p>                                                                                                                                 |    |
| Commitment to be in compliance with all relevant anti-corruption laws, including the implementation of procedures to know the law and monitor changes. | <p>The following ASOS codes include commitments to be in compliance with relevant anti-corruption laws:</p> <ul style="list-style-type: none"><li>• ASOS Do the Right Thing - Code of Integrity</li><li>• Supplier Ethical Code</li></ul>                                                                                        | <p>ASOS Reporting and Policies <a href="#">VIEW</a></p> <p>ASOS Business Integrity <a href="#">VIEW</a></p> <p>ASOS Do the Right Thing – Code of Integrity <a href="#">VIEW</a></p> |   |
| Detailed policies for high-risk areas of corruption.                                                                                                   | <p>The ASOS Group Tax Strategy sets out our approach to managing tax risks.</p>                                                                                                                                                                                                                                                  | <p>ASOS Group Tax Strategy <a href="#">VIEW</a></p>                                                                                                                                 |  |



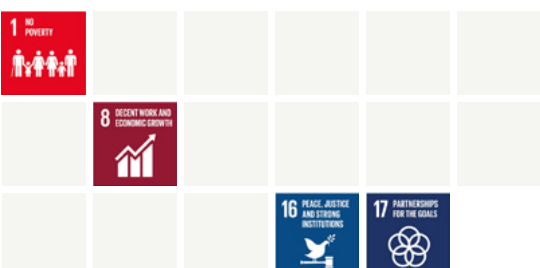
12: The COP describes robust commitments, strategies or policies in the area of anti-corruption

| UNGC best practices                                   | ASOS Examples                                                                                                                                           | References                                                                                            | Related SDGs                                                                        |
|-------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|
| 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. | <div>ASOS Reporting and PoliciesVIEW</div> <div>ASOS Do the Right Thing – Code of IntegrityVIEW</div> |  |



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

| UNGC best practices                                                                                                                        | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                   | References                                   | Related SDGs                                                                          |
|--------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|---------------------------------------------------------------------------------------|
| 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 <a href="#">VIEW</a> |    |
| 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.                                                                                                                                                                                                                                                                              | Annual Report 2021 <a href="#">VIEW</a>      |   |
| Human Resources procedures supporting the anti-corruption commitment or policy, including communication to and training for all employees. | <ul style="list-style-type: none"><li>• All new employees are trained on Do the Right Thing code and the Gifts &amp; Hospitality policy.</li><li>• Employees receive refresher training on these policies through internal communications and workplace posts.</li><li>• We have an online tool for gifts and hospitality reporting.</li><li>• We send out regular internal communications to employees on business integrity issues.</li></ul> | ASOS Business Integrity <a href="#">VIEW</a> |  |

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




| UNGC best practices                                                                                          | ASOS Examples                                                                                                                                                                                                                                                                      | References                                                                                         | Related SDGs                                                                          |
|--------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|
| Internal checks and balances to ensure consistency with the anti-corruption commitment.                      | 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 Business Integrity <a href="#">VIEW</a>                                                       |    |
| Actions taken to encourage business partners to implement anti-corruption commitments.                       | <ul style="list-style-type: none"><li>• All suppliers and third-party brands are contractually obliged to comply with Do the Right Thing – Code of Integrity and Supplier Ethical Code.</li><li>• We run annual supplier training workshops which cover anti-corruption.</li></ul> | ASOS Business Integrity <a href="#">VIEW</a><br><hr/> Ethical Trade Programme <a href="#">VIEW</a> |   |
| 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 <a href="#">VIEW</a>                                                       |  |

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

| UNGC best practices                                                                                         | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | References                                                                     | Related SDGs                                                                          |
|-------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|
| 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"><li>• Employee gifts and hospitality online reporting tool</li><li>• Company grievance procedure</li><li>• Spot, an independent 24/7 whistleblowing service that employees can use to raise problems and report concerns, completely anonymously and confidential with no repercussions. Reports raised via Spot are investigated by the General Counsel and the Business Assurance Manager</li></ul> <p>We raise awareness of these mechanisms through internal communications channels including social media, screens, workshops, online videos, conferences and the Employee Forum.</p> | <div>Modern Slavery StatementVIEW</div> <div>ASOS Business IntegrityVIEW</div> |    |
| Internal accounting and auditing procedures related to anticorruption                                       | <ul style="list-style-type: none"><li>• Deloitte completes an internal audit of our business annually which includes a review of our anti-bribery and corruption measures.</li><li>• This year we began the evolution of our Internal Audit function with the appointment of a Director of Internal Audit &amp; Risk and a Head of Internal Audit who are working to build an in-house Internal Audit function. Previously the company's Internal Audit function has been solely outsourced to Deloitte LLP, but from FY22 we will move to a co-source arrangement to bring greater assurance and more integrated support to the business on a day-to-day basis.</li></ul>                                                                          | <div>Annual Report 2021VIEW</div>                                              |  |



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

| UNGC best practices                                                  | ASOS Examples                                                                                                                                                                                                                                                               | References         |                      | Related SDGs                                                                          |
|----------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|----------------------|---------------------------------------------------------------------------------------|
| Leadership review of monitoring and improvement results.             | <ul style="list-style-type: none"><li>• The Audit Committee receives regular reports on the operation of our anti-corruption policies.</li><li>• Outcomes from Spot are reported to the Audit Committee who have the right to review investigations if requested.</li></ul> | Annual Report 2021 | <a href="#">VIEW</a> |    |
| Process to deal with incidents.                                      | We have a crisis management communication tool in place across all 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.                                                                                                                                          | Annual Report 2021 | <a href="#">VIEW</a> |  |



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

| UNGC best practices                                                                                  | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | References                                                                                                                                                               | Related SDGs |
|------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|
| Align core business strategy with one or more relevant UN goals/issues.                              | The four pillars of our FWI strategy; Be Net Zero, Be More Circular, Be Transparent, Be Diverse and the ASOS Foundation drive our approach to business and all align with one or more of the SDGs.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | ASOS_AR2021 (asosplc.com) <div>VIEW</div>                                                                                                                                |              |
| Develop relevant products and services or design business models that contribute to UN goals/issues. | <p>Some examples of the products and services we have developed include:</p> <ul style="list-style-type: none"><li>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.</li><li>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.</li><li>We are a signatory of Textiles 2030 and have signed the circular economy commitment</li><li>As a member of Ellen MacArthur Foundation - we are committed to their Circulytics tool</li><li>Delivered an innovative research project on circular business models with CFS and Cambridge university</li><li>In response to the COVID-19 pandemic, we have worked to raise over £700,000 for charities supporting those vulnerable to the crisis via fundraising products sold on ASOS.com</li><li>Trialled customer pre-loved clothing donations with DPD, making it possible for customer to donate clothing to charity from their doorstep.</li></ul> | <p>Made in Kenya <div>VIEW</div></p> <p>Our Products <div>VIEW</div></p> <p>GFA Circular Fashion Commitment <div>VIEW</div></p> <p>DPD ReLove scheme <div>VIEW</div></p> |              |

16: The COP describes strategic social investments and philanthropy

| UNGC best practices                                                                                                                                                                                   | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | References                                                                                                                                                                                 | Related SDGs |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|
| <p>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.</p>     | <p>As part of our FWI strategy we invest in a range of social programmes. Follow the links for more information.</p> <p>This year we partnered with Exist Loudly, a London-based youth organisation committed to creating spaces of joy, community and care for Black LGBTQ+ youths through creative intervention, self-expression and digital storytelling. We raised money for Exist Loudly through the sale of specially designed product. Funds generated will support Black LGBTQ+ youths who are NEET (not in employment, education and training), helping them to explore different creative mediums, build employability skills.</p> | <div>ASOS FoundationVIEW</div> <div>Ethical Trade PartnershipsVIEW</div> <div>Community ProgrammesVIEW</div> <div>Inclusion PartnershipsVIEW</div> <div>Exist Loudly PartnershipVIEW</div> |              |
| <p>Coordinate efforts with other organizations and initiatives to amplify—and not negate or unnecessarily duplicate—the efforts of other contributors.</p>                                            | <p>We partner with a number of organisations and cross industry initiatives to deliver FWI and ASOS Foundation programmes. Follow the links for more information.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <div>ASOS FoundationVIEW</div> <div>Fashion With Integrity Report 2030 Strategy reportVIEW</div>                                                                                           |              |
| <p>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.</p> | <p>We always work with established local partners/NGOs to help us design, implement and manage locally and culturally sensitive social and community programmes.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <div>ASOS FoundationVIEW</div> <div>Ethical Trade PartnershipsVIEW</div>                                                                                                                   |              |

17: The COP describes advocacy and public policy engagement

| UNGC best practices                                                                                                                                           | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | References                                                                                                                                                                                                                                                                                                                                                           | Related SDGs                                                                          |
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| Publicly advocate the importance of action in relation to one or more UN goals/issues.                                                                        | <p>Some examples from the last year include:</p> <ul style="list-style-type: none"><li>Publicly supporting the Black Lives Matter movement and making donations to relevant charities</li><li>Committing to improving gender equality and reducing our Ethnicity and Gender Pay Gap</li><li>Launch of Circular guidelines to raise awareness of circular design principles as an educational resource</li><li>Asking third-part brands to sign the Transparency Pledge and join the Fast Forward auditing programme to ensure transparency and fair treatment of their supply chains. We will ensure that 100% of third-party brands sign up to the Transparency Pledge by 2025.</li><li>Developing programmes supporting the Global Framework Agreement with IndustriALL Global trade union.</li><li>Trialled customer pre-loved clothing donations with DPD, making it possible for customer to donate clothing to charity from their doorstep.</li></ul> | <div><div>Ethnicity and Gender Pay Gap Report 2021</div><div>VIEW</div></div> <div><div>Fashion With Integrity Report 2030 Strategy report</div><div>VIEW</div></div> <div><div>Transparency Pledge and Fast Forward</div><div>VIEW</div></div> <div><div>Modern Slavery Statement</div><div>VIEW</div></div> <div><div>DPD ReLove scheme</div><div>VIEW</div></div> |    |
| Commit company leaders to participate in key summits, conferences, and other important public policy interactions in relation to one or more UN goals/issues. | <p>Senior leaders in the business host and participate in government roundtables and conferences on industry related issues such modern slavery, the circular fashion economy, sustainability in the fashion industry and due diligence in textile sourcing.</p> <p>We take part in regular industry meetings, such as with the BRC and consult with government figures such as Baroness Lola Young. We also take part in other government consultations if and when requested to.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <div><div>ASOS Modern Slavery House of Lords</div><div>VIEW</div></div> <div><div>ASOS joins Global Fashion Agenda</div><div>VIEW</div></div> <div><div>OECD due diligence in textile sourcing</div><div>VIEW</div></div>                                                                                                                                            |  |

18: The COP describes partnerships and collective action

| UNGC best practices                                                                                                                                                                                                                                                   | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | References                                                                                                                                                                                                                                                                                                             | Related SDGs |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|
| <p>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.</p>                                                                         | <p>We partner with a number of organisations and cross industry initiatives to deliver FWI and ASOS Foundation programmes. Follow the links for more information.</p> <p>This year we partnered with the grass roots anti-racism campaign, Love Music Hate Racism (LMHR). We sold a collection of t-shirts to raise charitable funds, and help spread the charity’s message. Monies raised will fund further their campaign, and support an artist residency programme, as well LMHR’s ‘Speak Up Thursday’ Radio show, which explores race and unity.</p> | <div><div>Modern Slavery Statement</div><div>VIEW</div><div>See pp.32-34 of our Modern Slavery Statement for our Collaborations and Stakeholder Engagements.</div></div> <div><div>Fashion With Integrity Report 2030 Strategy report</div><div>VIEW</div></div> <div><div>LMHR Partnership</div><div>VIEW</div></div> |              |
| <p>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.</p> | <p>See above.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <p>See above.</p>                                                                                                                                                                                                                                                                                                      |              |



19: The COP describes CEO commitment and leadership

| UNGC best practices                                                                                                                       | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | References                                                                                                                                       | Related SDGs |
|-------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|--------------|
| CEO publicly delivers explicit statements and demonstrates personal leadership on sustainability and commitment to the UN Global Compact. | <ul style="list-style-type: none"><li>• Our Plc website contains a page on ASOS’ membership of the UNGC and includes a statement of support for the initiative from ASOS CEO.</li><li>• Our CEO has also written forewords or statements for the following reports, communicating the importance to act on those topics:<ul style="list-style-type: none"><li>• Gender and Ethnicity Pay Gap Report</li><li>• Carbon Emission Report</li><li>• Modern Slavery Statement</li></ul></li></ul> | <div>Ethnicity and Gender Pay Gap Report 2021VIEW</div> <div>ASOS Carbon Emissions Report 2021VIEW</div> <div>Modern Slavery StatementVIEW</div> |              |
| CEO promotes initiatives to enhance sustainability of the company’s sector and leads development of industry standards.                   | See above.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <div>Ethnicity and Gender Pay Gap Report 2021VIEW</div> <div>ASOS Carbon Emissions Report 2021VIEW</div> <div>Modern Slavery StatementVIEW</div> |              |
| CEO leads executive management team in development of corporate sustainability strategy, defining goals and overseeing implementation.    | This year we completed a critical assessment of our corporate responsibility programme, Fashion with Integrity (FWI), and how it is governed internally. This piece of work was led by our Chief Strategy Officer with support from our CEO. This led to creation of our new FWI Strategy.                                                                                                                                                                                                  | <div>Fashion With IntegrityVIEW</div>                                                                                                            |              |


20: The COP describes Board adoption and oversight

| UNGC best practices                                                                                                                       | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                            | References                                                                                     | Related SDGs |
|-------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|--------------|
| Board of Directors (or equivalent) assumes responsibility and oversight for long-term corporate sustainability strategy and performance.  | <p>Underpinning our new FWI strategy, its goals and KPIs is a new approach to ESG (Environment, Social and Governance) governance and reporting. We have formed a new ESG committee, which is chaired by the CEO and attended by members of the ASOS executive team and those accountable for delivering our Fashion with Integrity (FWI) and ESG programme.</p> <p>This new approach will ensure the effective delivery of the strategy and management of ESG risk.</p> | <div>Fashion With Integrity</div> <div>VIEW</div>                                              |              |
| Board establishes, where permissible, a committee or assigns an individual board member with responsibility for corporate sustainability. | <p>The new ESG Committee, chaired by the CEO, meets quarterly, reporting to the ASOS Plc Board on a six-monthly basis.</p>                                                                                                                                                                                                                                                                                                                                               | <div>Fashion With Integrity</div> <div>VIEW</div>                                              |              |
| Board (or committee), where permissible, approves formal reporting on corporate sustainability (Communication on Progress).               | <p>The Executive Board signs off the corporate responsibility section of our Annual Report and formally approves ASOS' Modern Slavery Statement.</p>                                                                                                                                                                                                                                                                                                                     | <div>ASOS CR Reports</div> <div>VIEW</div> <div>Modern Slavery Statement</div> <div>VIEW</div> |              |

21: The COP describes stakeholder engagement

| UNGC best practices                                                                                | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | References                                                                                                                                                         | Related SDGs |
|----------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|
| 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 CR ReportsVIEW                                                                                                                                                |              |
| Define sustainability strategies, goals and policies in consultation with key stakeholders.        | <p>We regularly consult with stakeholders on the development of key corporate responsibility strategies and policies. Some examples include:</p> <ul style="list-style-type: none"><li>• 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.</li><li>• Development of the Circular brand guidelines with Centre for Sustainable Fashion, as well as engaging EMF, H&amp;M, and PVH</li><li>• 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.</li><li>• We have asked third-party brands to sign the Transparency Pledge and join the Fast Forward auditing programme to ensure transparency and fair treatment of their supply chains. By 2025, 100% of third-party brands will have signed up to the Transparency Pledge.</li></ul> | <p>Modern Slavery StatementVIEW</p> <p>ASOS Carbon Emissions Report 2021VIEW</p> <p>Transparency Pledge and Fast ForwardVIEW</p> <p>Fashion With IntegrityVIEW</p> |              |

21: The COP describes stakeholder engagement

| UNGC best practices                                                                                                                              | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | References                                                                                                                                                                                                                                                                     | Related SDGs                                                                        |
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| <p>Consult stakeholders in dealing with implementation dilemmas and challenges and invite them to take active part in reviewing performance.</p> | <p>We seek to incorporate the views of key stakeholders when designing and reviewing our FWI programmes. Over the last 12 months we have regular engaged with the following external stakeholders to help inform our strategy:</p> <ul style="list-style-type: none"><li>• The Ellen MacArthur Foundation</li><li>• Centre for Sustainable Fashion</li><li>• Canopy</li><li>• Textiles 2030 (MSI)</li><li>• Textile Exchange</li><li>• Better Cotton Initiative</li><li>• Sustainable Apparel Coalition</li><li>• Higg Index</li><li>• Anti-Slavery International</li></ul> <p>Follow the links for further information.</p> | <div><div>Stakeholder EngagementVIEW</div><div>Modern Slavery StatementVIEW</div><div>Modern Slavery StatementVIEW</div><div>See pp.32-34 of our Modern Slavery Statement for our Collaborations and Stakeholder Engagements.</div><div>Fashion With IntegrityVIEW</div></div> |  |

21: The COP describes stakeholder engagement

| UNGC best practices                                                                                                                                      | ASOS Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | References                                                                                                                 | Related SDGs |
|----------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|--------------|
| <p>Establish channels to engage with employees and other stakeholders to hear their ideas and address their concerns, and protect ‘whistle-blowers’.</p> | <p>We have a number of channels in place to engage with key stakeholders:</p> <ul style="list-style-type: none"><li>• Company grievance procedure</li><li>• Spot, an independent 24/7 whistleblowing service that employees can use to raise problems and report concerns, completely anonymously and confidential with no repercussions. Reports raised via Spot are investigated by the General Counsel and the Business Assurance Manager</li><li>• For supply chain workers, we run 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.</li><li>• In Mauritius we have developed a smartphone app and pre-departure training for supply chain workers considering migration to Mauritius to support ethical recruitment. We’ve also established a trade-union-based support centre for migrant workers in Mauritius, providing grievance advice and case management.</li></ul> | <div><div>Modern Slavery Statement</div><div>VIEW</div></div> <div><div>ASOS Business Integrity</div><div>VIEW</div></div> |              |



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