

ASOS Code of Conduct

ASOS is committed to respecting, protecting and championing the human rights of all who come into contact with our operations, including employees, supply chain workers, customers, and local communities.

It's our responsibility to make sure that the human rights of every worker in our supply chain are respected and protected. Everyone in our supply chain should feel safe at work, financially secure and respected. To realise this responsibility we:

- engage with the societies in which we operate, and with our partners throughout our supply chain;
- provide visibility of our supply chain and transparency to the customer;
- monitor our supply chain;
- address social impacts and remediate.

All our suppliers are required to comply in full with this Code of Conduct throughout their supply chain where ASOS production takes place. Where differences or conflicts arise, the highest standard for protection of workers shall apply.

NO FORCED LABOUR, HUMAN TRAFFICKING & SLAVERY

ASOS condemns and prohibits all forms of modern slavery.

The supplier must not use forced labour, including prison labour, indentured labour, bonded labour or other forms of forced labour. All workers should have access to and/or control of their citizenship documents at all times.

The supplier is responsible for employment eligibility fees of all workers, including recruitment fees.

NO CHILD LABOUR

Suppliers and their subcontractors may not employ anyone below 15 years of age, or the local legalminimum age, or the age for completing compulsory education, whichever of the three is higher.

Suppliers are encouraged to develop workplace apprenticeship programmes, provided that all participantsmeet both our legal age and minimum wage requirements.

Employees under 18 must not be employed in hazardous conditions.

In case child labour is revealed, suppliers must take responsibility in remediation of the adverse impacts toensure the well-being of the minor.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

We recognise that both a worker's right to organise and bargain collectively are the foundations for the realisation of other labour rights. Suppliers must guarantee the right of their employees to join unions and tobargain collectively.

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The Employer must not prevent, or discriminate against workers who wish to associate or bargain collectively. The Employer must adopt an open attitude towards the organisational activities of Trade Unions.

Where the right to freedom of association and collective bargaining is restricted under law, the supplier mustallow the development of parallel means for independent and free association and bargaining.

NO DISCRIMINATION

Suppliers and their subcontractors must not discriminate against any of their employees including hiring, compensation, promotion or discipline. Employees must treated with respect and equality regardless of gender, race, religion, caste, age, disability, sexual orientation, pregnancy, marital status, nationality,

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political opinion, trade union affiliation, social or ethnic origin. Women and men shall receive equal pay forwork of equal value

NO HARASSMENT OR ABUSE

We do not tolerate harassment, physical, sexual, psychological or verbal abuse, and corporal punishment inour supply chain. Suppliers must treat their employees with respect and dignity.

WAGES AND BENEFITS

All women and men have the right to be compensated for a regular work week that is sufficient to meet employees' basic needs and provide some discretionary income. Suppliers and their sub-contractors must payat least the legal minimum wage on a timely manner, and all the legally mandated benefits including holidays and leaves, and statutory severance when employment ends. Disciplinary deductions from pay is not tolerated. ASOS will prefer suppliers who provide wages and benefits that exceed legal requirements, through both individual or collective labour agreements.

NO EXCESSIVE WORKING HOURS

Workers must not be obliged to work in excess of the regular workweek and maximum overtime set by local law. A regular workweek shall not exceed 48 hours and one day off shall be guaranteed for every seven-dayperiod. Other than in exceptional circumstances, the sum of regular and overtime hours in a week shall not exceed 60 hours. Overtime shall be voluntary and compensated at a premium rate and not be requested on aregular basis.

REGULAR EMPLOYMENT RELATIONSHIP

Suppliers and their subcontractors must adopt and adhere to rules and conditions of employment that respect workers, and, at a minimum, safeguard their rights under national and international labour and social security laws and regulations. Homeworkers must be compensated and treated accordingly with this Code.

SAFE WORKING ENVIRONMENT

Suppliers and their sub-contractors must provide a safe and hygienic working environment for all employees. There must be systems in place to detect, avoid and respond to potential risks to the safety of all employees. All possible precautions must be taken to prevent accidents at the workplace. Suppliers and their sub-contractors must ensure that the manufacturing and storing buildings are safe, fire and emergency action plansare in place. All safety measures must also be in place at dorms, canteens, and childcare facilities. All workershas the right to refuse unsafe working conditions.

TRANSPARENCY

Sub-contracting of any part of ASOS production without the knowledge and approval of ASOS will not be tolerated. Sub-contractors must meet all the requirements set out in this Code of Conduct.

BUSINESS ETHICS

ASOS will not tolerate corruption and/or bribery throughout its supply chain.

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