



# United Nations Global Compact Advanced Communication On Progress

2021 - 2022

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**asos**

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# Chief Executive Officer Statement of Support

## Dear Mr. Secretary-General

I am pleased to endorse our commitment to the United Nations Global Compact (UNGC) and its ten principles with respect to human rights, labour, the environment, and anti-corruption.

In this, our tenth Communication on Progress (COP), we demonstrate progress against our sustainability programme, Fashion with Integrity (FWI). Focused on four key goals – Be Net Zero, Be More Circular, Be Transparent and Be Diverse – FWI reflects our commitment to doing business responsibly, delivering benefits for people and reducing our impact on the planet, building on the decade of progress since we first launched FWI in 2010.

Through FWI, we continue to make progress to embed the UNGC principles into our business strategy, our culture, and our day-to-day operations. A significant mark of progress this

year relates to value chain implementation, as we conducted scenario analysis across our value chain for the first time and aligned to the recommendations of the Task Force of Climate-Related Financial Disclosures (TCFD).


We have mapped our efforts against the Sustainable Development Goals (SDGs). We also 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).

**José Antonio Ramos Calamonte,**  
Chief Executive Officer, ASOS Plc



José Antonio Ramos, CEO, ASOS Plc

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



## Principles and Global Goals Addressed in this CoP:

Principles: [Human Rights](#) [Labour Rights](#) [Environment](#) [Anti-Corruption](#)

Sustainable Development Goals:

<b>3</b> GOOD HEALTH AND WELL-BEING	<b>4</b> QUALITY EDUCATION	<b>5</b> GENDER EQUALITY	<b>6</b> CLEAN WATER AND SANITATION	<b>7</b> AFFORDABLE AND CLEAN ENERGY	<b>8</b> DECENT WORK AND ECONOMIC GROWTH
<b>9</b> INDUSTRY, INNOVATION AND INFRASTRUCTURE	<b>10</b> REDUCED INEQUALITIES	<b>11</b> SUSTAINABLE CITIES AND COMMUNITIES	<b>13</b> CLIMATE ACTION	<b>16</b> PEACE, JUSTICE AND STRONG INSTITUTIONS	

ASOS

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

UNGC best practices    ASOS Examples		References
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	<p>Fashion with Integrity (FWI) guides our approach to business at ASOS. Since 2010, it’s been our programme for moving us forward in a more responsible and sustainable way. Our FWI strategy has four key goals: Be Net Zero, Be More Circular, Be Transparent and Be Diverse.</p> <p>We have recently evolved our corporate governance structure regarding environmental, social and governance (ESG) issues, in recognition of the importance of these issues to the future of the business. The highest level of governance is the Board-level ESG Committee, a delegated body of Non-executive Directors which provides oversight on behalf of and to the ASOS Plc Board in relation to the Group’s ESG strategy and activities, including around the subject of climate change. The ESG Committee meets formally four times per year and feeds back to the ASOS Plc Board after every meeting.</p> <p>Reporting into the Board-level ESG Committee are our FWI Working Group and Governance Working Group. To ensure greater consistency of approach, the General Counsel &amp; Company Secretary chairs both groups, acting as the key liaison between the ASOS Plc Board and the Executive team. These Working Groups are comprised of a cross-functional team of senior leadership, representing all key areas of the business. The FWI Working Group was responsible for the formation of the new FWI strategy announced in September 2021. The group oversaw the development of the strategy and associated commitments, including our verified science-based carbon reduction targets. The FWI Working Group meets monthly and the Governance Working Group meets bi-monthly, with both reporting updates to the ESG Committee on a quarterly basis.</p> <p>Our Executive team holds collective responsibility for delivery of our cross-functional FWI programme. Accordingly, Executive remuneration is partly weighted towards FWI targets, which includes climate targets.</p> <p>As part of our operational excellence programme, we have also appointed the Responsible Sourcing Director to a new role as Commercial ESG &amp; Sustainability Director, reflecting the role in driving progress across both our People and Planet pillars within our Commercial team.</p> <p>In addition, sustainability and climate change have been identified as a principal risk to ASOS, and therefore it is considered as part of the Company’s six-monthly risk review reported to the Audit Committee of the ASOS Plc Board.</p>	<div><div>Annual Report 2022</div><div>VIEW</div></div> <div><div>ESG Committee</div><div>VIEW</div></div> <div><div>Fashion With Integrity</div><div>VIEW</div></div>

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

UNGC best practices	ASOS Examples	References
Assign responsibility for corporate sustainability implementation to an individual or group within each business unit and subsidiary	See above	See above
Ensure that different corporate functions coordinate closely to maximize performance and avoid unintended negative impacts	See above	See above

2: The COP describes value chain implementation

UNGC best practices ASOS Examples		References
Analyse each segment of the value chain carefully, both upstream and downstream, when mapping risks, opportunities and impacts	<p>Our FWI 2030 strategy outlines our goals and commitments to building full visibility of our value chain. We are committed to calculating and reporting our annual full Scope 1, Scope 2 and Scope 3 carbon emissions. Our ESG governance structure is responsible for delivering the FWI strategy and goals, as well as wider ESG risk and performance management. We manage ESG related risks in the same way as all other business risks, with senior-level management and oversight. Our approach to value chain risk assessment comprises of desk-based research, supply chain mapping, Self Assessment Questionnaires (SAQs), auditing and internal and external stakeholder engagement.</p> <p>This year we have continued to drive progress towards our FWI ‘Be Transparent’ goals, specifically around the upstream value chain. We have currently mapped Tiers 1-3 and will continue to improve on our visibility of Tier 4. We’re committed to achieving full transparency down to Tier 5 for our own supply chain by 2030 at the latest by investing in the necessary technology and working with our partners. As a member of Textile2030 we calculate the carbon and water impact at Tier 1, based on our total material tonnage annually. As a member of the Sustainable Apparel Coalition, we engage with and gather data of the own-brand supply chain at facility level across Tiers 1-4 on environmental management.</p> <p>Within our ‘Be Transparent’ pillar we are requesting that 100% of ASOS’ partner brands publicly share their Tier 1 supply chains by 2025, and in June 2022 we mandated commitment to this as a minimum requirement for all new brands who wish to partner with ASOS. In addition to this, we have reinforced the screening process for new brands wishing to partner with ASOS, updating our Brand self-assessment questionnaire and educating our commercial buying teams. Now an on-line screening document, the SAQ asks brands for a greater level of disclosure on the supply chain management and environmental impact of our partner brands.</p> <p>This year we worked with an expert third-party consultancy firm to understand our value chain’s climate risk exposure and complete our first analysis aligning to the recommendations from the Task Force of Climate-Related Financial Disclosures (TCFD). This analysis identified risks and opportunities associated with the physical changes in climate and the risks associated with the transition to a lower carbon economy across the short, medium and long term under three scenarios. Identified physical and transition risks and opportunities were assessed using our defined threshold levels in our multi-disciplinary company-wide risk management process.</p> <p>Asset by asset exposure analysis for a range of climate risks and opportunities at the present day, as well as for future projections, was undertaken across the value chain. This included ASOS’ own operations (offices, fulfilment centres, returns processing centres), Tiers 1-3 of ASOS own-brand supply chain, and key raw material sourcing regions (Tier 5) for two most-used natural materials: cotton and viscose. For this TCFD analysis, all ASOS operational assets were analysed and for the ASOS own-brand supply chain, 45 out of the top 50 suppliers by value were assessed. This totalled 265 supply chain locations across Tier 1-3 and represented 60% of the total own-brand intake value and 62% of all materials by weight.</p>	<div><div>Fashion With IntegrityVIEW</div><div>Fashion with Integrity 2030 StrategyVIEW</div><div>Annual Report 2022 Pages 36-44 for TCFD disclosureVIEW</div></div>

2: The COP describes value chain implementation

UNGC best practices    ASOS Examples		References
Communicate policies and expectations to suppliers and other relevant business partners	<p>ASOS Brands and non-stock suppliers are expected to comply with ASOS codes and policies. Follow the Reporting and Policies link for further information.</p> <p>This year many of our ASOS own-brand supplier policies were updated to move towards best-practice, this included the Environmental Code of Conduct, Cotton Sourcing Policy and Man-Made Cellulosic Fibre Policy, Animal Derived Materials Policy, Chemical Policy and Restricted Substance List. All suppliers were notified of these updates via monthly newsletters.</p> <p>Partner brands are expected to be compliant with a set of minimum requirements covering ethical trade, modern slavery, chemical compliance, and animal welfare. This year we also relaunched our Third-Party Brands Ethical Trade Policy which all partner brands must adhere to as a part of their contractual Terms &amp; Conditions.</p> <p>Our partners are regularly engaged on the policies through communications and 1-2-1 guidance to support their progression against the ASOS Third-party brand maturity framework.</p>	<p>Reporting and Policies <a href="#">VIEW</a></p>
Implement monitoring and assurance mechanisms (e.g. audits/screenings) for compliance within the company’s sphere of influence	<p>Appropriate assurance and oversight of risk management is guided by our approach to risk appetite and echoes the ‘Three Lines of Defence’ model, where day-to-day responsibility for risk management lies with business control owners in the first line. The Risk team provide second line guidance, oversight, and challenge on risk management activities and facilitate the risk management process to provide insights and assurance to the Audit Committee and Board. Internal Audit deliver risk-based audits in the third line to provide independent assurance over key risks. We are in the process of enhancing our reporting by seeking external assurance, please see our latest annual report for more details.</p> <p>For our own-brand stock suppliers, 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. 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. Between May 2021 and August 2022, together with third-party auditors, we carried out 649 unannounced audits, giving visibility of working conditions across the Tier 1-2 sites in our supply chain. This accounts for nearly 90% of our Tier 1-3 supply chain and covers 64% of the total workforce. Building on our annual audits of Tier 1 and Tier 2 facilities, we are now collecting SAQs from our Tier 3 suppliers on an ongoing basis. We maintain frequent contact with our suppliers to make sure any outstanding corrective actions found during audits are resolved.</p> <p>70% of our suppliers by volume have carried out an environmental self-assessment to monitor their environmental performance and potential risks. Additionally, all partner brands we sell must complete an ethical and sustainable SAQ so we can assess their baseline performance level.</p>	<p>Annual Report 2022 <a href="#">VIEW</a></p> <p>Modern Slavery Interim Statement April 2021 – May 2022 <a href="#">VIEW</a></p> <p>Modern Slavery Statement April 2021 – August 2022 <a href="#">VIEW</a></p>

2: The COP describes value chain implementation

UNGC best practices    ASOS Examples		References
Undertake awareness-raising, training and other types of capacity building with suppliers and other business partners	We run regular tailored conferences, workshops and online webinars and provide training tools for suppliers and partners. For example, in Mauritius in May 2022 local IndustriALL trade union affiliate CTSP conducted in-factory training for workers in our Mauritian supply chain on the Just Good Work Mauritius app. International Labour Organisation (ILO) Better Work, a key partner of ours, runs advisory and training sessions in our factories in Madagascar. In June 2022 we held a supplier and factory workshop in Bulgaria to refresh them on our ethical standards, policies, sourcing strategy and sustainability requirements. We also participate in a number of initiatives aimed at building supplier capacity. Follow the links for further information.	<div><div>Modern Slavery Interim Statement April 2021 – May 2022</div><div>VIEW</div></div> <div><div>Modern Slavery Statement April 2021 – August 2022</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
Commitment to comply with all applicable laws and respect internationally recognised human rights, wherever the company operates (e.g., the Universal Declaration of Human Rights, Guiding Principles on Human Rights)	<p>Our FWI programme was developed with reference to the United Nations Global Compact, United Nations Sustainable Development Goals and the United Nations Guiding Principles on Business and Human Rights.</p> <p>All ASOS codes and policies are aligned with internationally-recognised human rights standards, such as the ILO Fundamental Conventions.</p> <p>Our Minimum Requirements for partner brands are based on recognised standards and legislation like the Ethical Trading Initiative (ETI) Base Code and UK Modern Slavery Act.</p>	<p><b>Fashion with Integrity</b></p> <p><a href="#">VIEW</a></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	We have integrated statements of policy expressing our commitment to respect and support human rights, which are all approved at Board level, as well as a number of policies stipulating our human rights expectations. Employees and supply chain partners are regularly engaged on these policies through internal communications, training, supplier communications, close relationship management and in country regional conferences. For publicly available codes, policies and statements and details of their scope, please follow the Reporting and Policies link.	<p><b>Reporting and Policies</b></p> <p><a href="#">VIEW</a></p>
Statement of policy stipulating human rights expectations of personnel, business partners and other parties directly linked to operations, products or services	See above	See above
Statement of policy publicly available and communicated internally and externally to all personnel, business partners and other relevant parties	See above	See above

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

UNGC best practices    ASOS Examples		References
Process to ensure that internationally recognised human rights are respected	<p>We work closely with own-brand suppliers and partner brands to help them meet our standards and improve conditions for workers in our supply chain.</p> <p>In June 2022, we relaunched our revised supply chain audit methodology to ensure we meet our external obligations on human rights due diligence and can monitor our supply chain to meet our FWI commitments. Our new audit methodology provides consistency between auditors and regions through a list of 202 assessment points formulated in line with the ASOS Code of Conduct.</p>	<div>Our Approach</div> <div>VIEW</div>
On-going due diligence process that includes an assessment of actual and potential human rights impacts	<p>ASOS' approach to due diligence that includes an assessment of actual potential human rights impacts is detailed in Criterion 2 'Implement monitoring and assurance mechanisms (e.g. audits/screenings) for compliance within the company's sphere of influence'.</p>	
Internal awareness-raising and training on human rights for management and employees	<p>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.</p> <p>Over the next year, we plan to:</p> <ul style="list-style-type: none"><li>● Relaunch our business-wide online modern slavery training</li><li>● Provide focused training to our internal teams including our 3rd party logistics providers, procurement and operations teams who deal with day-to-day non-stock supplier engagement</li><li>● Provide training to workers within major non-stock locations on labour rights and grievance mechanisms, in collaboration with grassroots organisations</li></ul>	
Operational-level grievance mechanisms for those potentially impacted by the company's activities	<p>ASOS' approach to operational-level grievance mechanisms for those potentially impacted by the company's activities is detailed in Criterion 21 'Establish channels to engage with employees and other stakeholders to hear their ideas and address their concerns, and protect 'whistle-blowers'.</p>	

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

UNGC best practices    ASOS Examples		References
Allocation of responsibilities and accountability for addressing human rights impacts	For responsibilities and accountability of our FWI programme, see Criterion 1 ‘The COP describes mainstreaming into corporate functions and business units’.	
Internal decision-making, budget and oversight for effective responses to human rights impacts	We have processes and budgets in place to respond to and remediate human rights impacts.  Depending on the severity of the impact we involve a number of key internal decision makers, including, when required, the Executive Board.  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.	<b>Modern Slavery Interim Statement April 2021 – May 2022</b> <a href="#">VIEW</a>
		<b>Modern Slavery Statement April 2021 – August 2022</b> <a href="#">VIEW</a>
Processes to provide for or cooperate in the remediation of adverse human rights impacts that the company has caused or contributed to	We continue to build local NGO and Trade Union partnerships in order to monitor and deliver effective remediation of any adverse human rights impacts. See our Child Labour, Remediation and Young Worker Policy for information on our child labour remediation programme.	<b>Modern Slavery Interim Statement April 2021 – May 2022</b> <a href="#">VIEW</a>
		<b>Modern Slavery Statement April 2021 – August 2022</b> <a href="#">VIEW</a>
		<b>Child Labour, Remediation and Young Worker Policy</b> <a href="#">VIEW</a>

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

UNGC best practices    ASOS Examples		References
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	We are actively involved with a range of organisations and initiatives such as our membership of Action, Collaboration, Transformation (ACT) to support collective action. We also sign frameworks, such as the Global Framework Agreement with IndustriALL Global Union, representing a strong framework for implementing freedom of association and other labour rights. In addition, 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.  Read our Modern Slavery Statement to find out more.	<div>PartnershipsVIEW</div> <div>Modern Slavery Interim Statement April 2021 – May 2022VIEW</div> <div>Modern Slavery Statement April 2021 – August 2022VIEW</div>

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

UNGC best practices	ASOS Examples	References
System to monitor the effectiveness of human rights policies and implementation with quantitative and qualitative metrics, including in the supply chain	Our audit programme and grievance mechanisms are used to monitor the implementation and effectiveness of human rights policies – see Criterion 2 ‘Implement monitoring and assurance mechanisms (e.g. audits/screenings) for compliance within the company’s sphere of influence’ and Criterion 21 ‘Establish channels to engage with employees and other stakeholders to hear their ideas and address their concerns, and protect ‘whistle-blowers’.	
Monitoring drawn from internal and external feedback, including affected stakeholders	<p>Within the ACT framework, we have conducted internal and external surveys on our purchasing practices, covering areas including sourcing strategy, forecasting &amp; capacity planning, price negotiations, changes to orders and terms of payment. Findings from these surveys are used to identify areas for improvement and set internal targets.</p> <p>We contribute to notable industry-wide reports, for example the Fashion Transparency Index and use our results and feedback to inform our strategy and programmes. We are proud to have increased our public disclosure about our social and environmental policies, practices and impacts from 47% in 2021 to 51% in 2022. ASOS is also the top scoring UK brand out of the 250 major fashion brands and retailers reviewed in the Fashion Transparency Index 2022.</p> <p>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.</p> <p>We partner with credible international stakeholders, for example Anti-Slavery International and IndustriALL Global Union to seek further independent feedback to inform strategy.</p> <p>We regularly engage with partner brands to address global human rights challenges. One example is our response to reports of human rights abuses in China’s Xinjiang Uyghur Autonomous Region and the consequential introduction of the Uyghur Forced Labour Prevention Act (UFLPA) in December 2021. This led us to engage with all our partner brands, calling action to ensure no products offered to or sold to ASOS is linked in any way to the XUAR or forced labour more widely both directly and indirectly.</p> <p>We respond to any media and NGO reports and are committed to incorporating advised actions and recommendations to reduce country specific risk.</p>	<div><div>Fashion Transparency Index</div><div>VIEW</div></div> <div><div>Modern Slavery Interim Statement April 2021 – May 2022</div><div>VIEW</div></div> <div><div>Modern Slavery Statement April 2021 – August 2022</div><div>VIEW</div></div>
Leadership review of monitoring and improvement results	Human rights and wider ethical trade performance is managed under our FWI programme. The ESG Committee receive quarterly updates on progress against FWI KPIs.	<div><div>Fashion with Integrity</div><div>VIEW</div></div>

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

UNGC best practices ASOS Examples		References
Process to deal with incidents the company has caused or contributed to for internal and external stakeholders	<p>We continue to build local NGO and Trade Union partnerships in order to monitor and deliver effective remediation of adverse human rights impacts, such as our ‘critical friend’ Anti Slavery International.</p> <p>ASOS’ audit and ‘beyond audit’ approach is described in UNGC Principle 2. Outcomes of the audits enable our head office and in-country teams to take immediate action and mitigate risk across our supply chain. We maintain frequent contact with our suppliers to make sure any outstanding corrective actions found during audits are resolved.</p> <p>As part of our Ethical Trade programme, we have developed several policies and guidelines to ensure workers are respected and protected across our supply chain. Our policies are contractually binding, helping us to manage the risks in our supply chain and to set out remediation steps when issues are found. We continually review and update our policies and guidelines to ensure they achieve the right results. For more information, please see Reporting and Policies link.</p> <p>We ask that all partner brands supplying product to ASOS that is manufactured in the UK join the ‘Fast Forward’ programme. This year we have continued to develop our relationship with ‘Fast Forward’ working to collaboratively drive engagement with the programme. This continuous improvement programme works to identify and remediate risk at factory level, helping to ensure robust compliance with our Third-Party Brands Ethical Policy.</p>	<p>Reporting and Policies <a href="#">VIEW</a></p>
Grievance mechanisms that are legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, and based on engagement and dialogue	<p>ASOS’ approach to operational-level grievance mechanisms that are legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, and based on engagement and dialogue is detailed in Criterion 21 ‘Establish channels to engage with employees and other stakeholders to hear their ideas and address their concerns, and protect ‘whistle-blowers’.</p>	
Outcomes of integration of the human rights principles [outcomes of due diligence process, external reporting of human rights impacts, disclosure of main incidents and outcomes of remediation]	<p>Our Modern Slavery Statements transparently report on outcomes and impacts of actions taken to address and remediate human rights abuses in our supply chain.</p>	<p>Modern Slavery Interim Statement April 2021 – May 2022 <a href="#">VIEW</a></p> <hr/> <p>Modern Slavery Statement April 2021 – August 2022 <a href="#">VIEW</a></p>

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

UNGC best practices ASOS Examples		References
Reference to principles of relevant international labour standards (ILO Conventions) and other normative international instruments in company policies	<p>We operate in line with our Supplier Ethical Code, based on the Ethical Trade Initiative (ETI) Base Code and International Labour Organisation (ILO) Fundamental Conventions, and thus defines the minimum standards we require from our suppliers.</p> <p>Our Ethical Trade policies have been extended in scope and are applicable to our non-stock supply chain. All non-stock suppliers are required to answer our ESG questionnaire before onboarding and are strongly encouraged to enrol with our ESG monitoring partner, EcoVadis.</p> <p>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).</p> <p>ASOS requires that all brand partners have a written Ethical Trade Policy covering the Ethical Trade Initiative Base Code and evidence of implementation through their supply chains.</p>	<div>Reporting and PoliciesVIEW</div>
Reflection on the relevance of the labour principles for the company	<p>Our Modern Slavery Statements reflect on the relevance of labour principles to our business.</p>	<div>Modern Slavery Interim Statement April 2021 – May 2022VIEW</div> <div>Modern Slavery Statement April 2021 – August 2022VIEW</div>

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

UNGC best practices	ASOS Examples	References
Specific commitments and Human Resources policies, in line with national development priorities or decent work priorities in the country of operation Examples: Inclusion of vulnerable/discriminated groups in the workforce (e.g., women, disabled, migrant, HIV/AIDS, older/younger workers); equal pay for work of equal value; contribution to national strategies to eliminate child/forced labour, etc.	<ul style="list-style-type: none"><li>• Our FWI 2030 Strategy report outlines our commitment for an inclusive and supportive environment for all people, and we have programmes in place to drive diversity, equity and inclusion across the business. In April 2022, we published our first annual FWI progress update</li><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>• 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>• We publish our Ethnicity Pay Gap data and Gender Pay Gap data, as part of our drive for transparency and inclusivity at ASOS</li><li>• We have gender-neutral health policies 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><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 creates opportunities that enable disadvantaged young people to reach their potential. Drawing on ASOS’ skills in tech and fashion, it provides the inspiration, education, support, infrastructure and training needed to unlock young people’s talent and give them the confidence to be whoever they want to be - helping them progress towards economic independence and shaping a brighter future we can all be proud of</li></ul>	<div>Fashion with IntegrityVIEW</div> <div>Fashion with Integrity 2030 StrategyVIEW</div> <div>Fashion with Integrity FY21 Progress UpdateVIEW</div> <div>Modern Slavery Interim Statement April 2021 – May 2022VIEW</div> <div>Modern Slavery Statement April 2021 – August 2022VIEW</div> <div>Reporting and PoliciesVIEW</div> <div>Global Framework AgreementVIEW</div> <div>Ethnicity and Gender Pay GapVIEW</div>

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

UNGC best practices    ASOS Examples		References
Continued...		<div>Gender-neutral Health PoliciesVIEW</div> <div>ASOS FoundationVIEW</div>
Participation and leadership in wider efforts by employers’ organisations (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)	Partnerships are integral to help us addressing risks, including modern slavery risks, and industry collaboration will be a key driver of sustainable change across the industry. We partner with a wide range of key organisations and initiatives.  For examples of tripartite approach, see Criterion 7 ‘Dialogue mechanism with trade unions to regularly discuss and review company progress in addressing labour standards’ and Criterion 8 Dialogues with the representative organisation of workers to regularly review progress made and jointly identify priorities for the future’.	PartnershipsVIEW
Structural engagement with a global union, possibly via a Global Framework Agreement	We have signed a Global Framework Agreement with IndustriALL, representing a strong framework for implementing freedom of association and other labour rights.	Global Framework AgreementVIEW

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

UNGC best practices ASOS Examples		References
Risk and impact assessments in the area of labour	<ul style="list-style-type: none"><li>• In our own-brand stock supply chain, Tier 1 and Tier 2 factories are audited at least once a year. Between May 2021 and August 2022, together with our third-party auditors, we carried out 649 unannounced and semi-announced audits across Tier 1 and 2 of our supply chain, which accounts for nearly 90% of our Tier 1-3 supply chain and covers 64% of the total workforce. We take a continuous improvement approach and look to work with our suppliers to ensure corrective actions have been implemented. Building on our annual audits of Tier 1 and Tier 2 facilities, we are now collecting SAQs from our Tier 3 suppliers on an ongoing basis</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><li>• We have developed ethical trading policies and mitigation strategies to protect vulnerable workers across our supply chain. Brand partners are required to be compliant with a set of minimum requirements on ethical trade and sustainability</li><li>• 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>	<div><div>Modern Slavery Interim Statement April 2021 – May 2022</div><div>VIEW</div></div> <div><div>Modern Slavery Statement April 2021 – August 2022</div><div>VIEW</div></div> <div><div>Global Framework Agreement</div><div>VIEW</div></div>
Dialogue mechanism with trade unions to regularly discuss and review company progress in addressing labour standards	<p>We have signed a Global Framework Agreement (GFA) with IndustriALL Global Union, representing a strong framework for implementing freedom of association and other labour rights. We are currently in the process of renegotiating our current GFA with a view to strengthening the right of workers to freedom of association and providing a clearer complaint resolution mechanism. We have also supported trade union capacity building in Mauritius, in collaboration with our local affiliate IndustriALL Global Union.</p> <p>In 2015, ASOS joined forces with international brands and retailers, alongside IndustriALL Global Union, to be part of the ACT initiative. Through our participation in ACT, we have signed a Memorandum of Understanding with IndustriALL Global Union that commits us to working with others in the sector to improve wages in key garment sourcing countries through collective bargaining. Together, ACT signatories have agreed sourcing and buying commitments that are linked to the achievement of an industry-wide collective agreement.</p> <p>We have 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, where Community is the recognised union.</p>	<div><div>Global Framework Agreement</div><div>VIEW</div></div>

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

UNGC best practices	ASOS Examples	References
Allocation of responsibilities and accountability within the organisation	For responsibilities and accountability of our FWI programme, see Criterion 1 ‘The COP describes mainstreaming into corporate functions and business units’.	
Internal awareness-raising and training on the labour principles for management and employees	<p>Our Executive 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.</p> <p>This year we rolled out refresher training to our branded buying teams which reinforced the importance of ensuring that our brand partners are compliant to the ASOS minimum ethical and environmental requirements. Buyers are also made aware of suppliers’ corrective action plans so they can support in driving improvements in labour standards.</p> <p>Our retail employees are trained on our Responsible Sourcing programme, responsible purchasing practices, and respectful and collaborative supplier relationships. Training continues to be a key focus for us. Over the next year, we plan to:</p> <ul style="list-style-type: none"><li>● Relaunch our business-wide online modern slavery training</li><li>● Provide focused training to our internal teams including our 3rd party logistics providers, procurement and operations teams who deal with day-to-day non-stock supplier engagement</li><li>● Provide training to workers within major non-stock locations on labour rights and grievance mechanisms, in collaboration with grassroots organisations</li></ul>	

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

UNGC best practices    ASOS Examples		References
Active engagement with suppliers to address labour-related challenges	<p>We run regular tailored conferences, workshops and online webinars and provide training tools for suppliers and partners. For example, in Mauritius in May 2022 local IndustriALL trade union affiliate CTSP conducted in-factory training for workers in our Mauritian supply chain on the Just Good Work Mauritius app. ILO Better Work, a key partner of ours, runs advisory and training sessions in our factories in Madagascar. In June 2022 we held a supplier and factory workshop in Bulgaria to refresh them on our ethical standards, policies, sourcing strategy and sustainability requirements.</p> <p>We also participate in a number of initiatives aimed at building supplier capacity. Follow the links for further information.</p>	<div><div>Modern Slavery Interim Statement April 2021 – May 2022</div><div>VIEW</div></div> <div><div>Modern Slavery Statement April 2021 – August 2022]</div><div>VIEW</div></div> <div><div>Partnerships</div><div>VIEW</div></div>
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 organisation of workers	<p>ASOS’ approach to 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 organisation of workers is detailed in Criterion 21 ‘Establish channels to engage with employees and other stakeholders to hear their ideas and address their concerns, and protect ‘whistle-blowers’.</p>	

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

UNGC best practices ASOS Examples		References
System to track and measure performance based on standardised performance metrics	Labour principles and wider ethical trade performance is managed under our FWI programme. The ESG Committee receive quarely updates on progress against FWI KPIs.	Fashion with Integrity <a>VIEW</a>
Dialogues with the representative organisation of workers to regularly review progress made and jointly identify priorities for the future	<p>We have signed a Global Framework Agreement with IndustriALL Global Union, representing a strong framework for implementing freedom of association and other labour rights.</p> <p>Through our ACT membership, we review progress in addressing labour standards and jointly identify priorities for the future.</p> <p>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.</p> <p>In addition to our existing policies, we have developed a Gender Policy, to further our commitment to empowering women in our supply chain. The implementation process will begin with three key sourcing countries, in collaboration with local stakeholders.</p> <p>We recognise the role community outreach needs to play in educating and engaging workers about their rights and providing support in accessing these. Over the past year we have been involved in several UK initiatives to achieve this, including:</p> <ul style="list-style-type: none"><li>• Fashion-Workers Advice Bureau Leicester (FAB-L)</li><li>• Workplace Support Agreement</li><li>• Apparel General Merchandising Public and Private Protocol (AGM PPP)</li></ul>	Modern Slavery Interim Statement April 2021 – May 2022 <a>VIEW</a>
		Modern Slavery Statement April 2021 – August 2022 <a>VIEW</a>
		Reporting and Policies <a>VIEW</a>
		Partnerships <a>VIEW</a>
		Global Framework Agreement <a>VIEW</a>

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

UNGC best practices ASOS Examples		References
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	<p>ASOS' audit and 'beyond audit' approach is described in UNGC Principle 2. Outcomes of the audits enable our head office and in-country teams to take immediate action and mitigate risk across our supply chain. We maintain frequent contact with our suppliers to make sure any outstanding corrective actions found during audits are resolved.</p> <p>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.</p> <p>As part of our Ethical Trade programme, we have developed several policies and guidelines to ensure workers are respected and protected across our supply chain. Our policies are contractually binding, helping us to manage the risks in our supply chain and to set out remediation steps when issues are found. We continually review and update our policies and guidelines to ensure they achieve the right results. For more information, please see Reporting and Policies link.</p>	<div>Reporting and Policies</div> <div>VIEW</div>
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>All of our UK (Tier 1 &amp; 2) own-brand supplier 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.</p> <p>Key audit providers we partner with are The Reassurance Network, ELEVATE, Sustainable Compliance Management, and the Accord. Another key partner of ours is ILO Better Work, which runs in-country programmes in Bangladesh, Cambodia, and Vietnam to improve compliance in our factories through assessments. ILO Better Work also runs advisory and training sessions in our factories in Madagascar.</p> <p>We participate in a number of initiatives aimed at improving ethical supply chain practices. Follow the link for further information.</p>	<div>Partnerships</div> <div>VIEW</div>
Outcomes of integration of the Labour principles [report main incidences]	<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>Modern Slavery Interim Statement April 2021 – May 2022</div> <div>VIEW</div> <div>Modern Slavery Statement April 2021 – August 2022</div> <div>VIEW</div>

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

UNGC best practices ASOS Examples		References
Written company policy on environmental stewardship	<p>This year we updated some Environmental policies for our ASOS own-brand suppliers, these include:</p> <ul style="list-style-type: none"><li>• Environmental Code of Conduct – covering the standards and responsibilities for ASOS suppliers as well as minimum standards for products</li><li>• Cotton Sourcing Policy – covering cotton targets as well standards for suppliers to follow in sourcing and verifying sustainable and conventional cotton</li><li>• Man-Made Cellulosic Fibre Policy – covering the use of MMCF and ASOS’ standards on traceability and sourcing</li><li>• Chemical policy and Restricted Substance List – covering the actions on chemical failures and list of global requirement for restricted substances covering all fabrics, components, products and packaging</li><li>• Animal Derived Materials Policy – covering the requirements of suppliers when using Animal Derived Materials</li></ul>	<div><div>Environmental Code of Conduct</div><div>VIEW</div></div> <div><div>Cotton Sourcing Policy</div><div>VIEW</div></div> <div><div>Man-Made Cellulosic Fibre Policy</div><div>VIEW</div></div> <div><div>Chemical Policy and Restricted Substance List</div><div>VIEW</div></div> <div><div>Animal Derived Materials Policy</div><div>VIEW</div></div>
Inclusion of minimum environmental standards in contracts with suppliers and other relevant business partners	ASOS Brands and non-stock suppliers are expected to comply with ASOS codes and policies.	<div><div>Reporting and Policies</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
Specific commitments and goals for specified years	<p>Our FWI strategy has four key goals: Be Net Zero, Be More Circular, Be Transparent and Be Diverse. Underpinning each is a series of metrics and key performance indicators (KPIs) so we can measure and communicate our progress. Our decarbonisation targets were set in collaboration with the Carbon Trust, a global climate change and sustainability consultancy, and verified by Science Based Targets initiative (SBTi).</p> <p>Follow the links for our FWI 2030 strategy and goals, as well as the first annual progress update published in April this year.</p>	<div><p>Fashion with Integrity 2030 Strategy</p><p>VIEW</p></div> <div><p>Fashion with Integrity FY21 Progress Update</p><p>VIEW</p></div>

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

UNGC best practices ASOS Examples		References
Environmental risk and impact assessments	<p>We undertake the following risk and impact assessments:</p> <ul style="list-style-type: none"><li>● Climate-related risks and opportunities associated with the physical changes in climate and the transition to a lower carbon economy across the short, medium and long term under three scenarios, in line with the TCFD recommendations (explained earlier in UNGC Principle 2)</li><li>● Scope 1, Scope 2 and Scope 3 carbon footprint assessment</li><li>● Renewable energy generation assessments under operational control</li><li>● Calculation of ASOS own-brand supply chain of carbon, water and waste footprint since 2012 using SCAP tool, now known as Textile2030</li><li>● Environmental impact assessment of our apparel supply chain through Sustainable Apparel Coalition’s Higg Index FEM (Tier 1-4)</li><li>● Supplier webinar series was conducted February-April 2022 whereby suppliers and facilities were invited to receive information and training on completing Higg FEM</li></ul>	<div><p><b>Fashion with Integrity</b></p><p><b>Annual Report 2022</b> Pages 36-44</p></div> <div><p><b>VIEW</b></p><p><b>VIEW</b></p></div>
Allocation of responsibilities and accountability within the organisation	<p>For responsibilities and accountability of our FWI programme, see Criterion 1 ‘The COP describes mainstreaming into corporate functions and business units’.</p>	
Grievance mechanisms, communication channels and other procedures (e.g. whistle-blower mechanisms) for reporting concerns or seeking advice regarding environmental impacts	<p>ASOS’ approach to grievance mechanisms, communication channels and other procedures (e.g. whistle-blower mechanisms) for reporting concerns or seeking advice regarding environmental impacts is detailed in Criterion 21 ‘Establish channels to engage with employees and other stakeholders to hear their ideas and address their concerns, and protect ‘whistle-blowers’.</p>	

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

UNGC best practices	ASOS Examples	References
System to track and measure performance based on standardised performance metrics	<p>We use a number of systems to track and measure environmental performance:</p> <ul style="list-style-type: none"><li>• Annual Scope 1, Scope 2 and Scope 3 carbon emissions reporting in line the GHG Protocol Standard</li><li>• Completion of benchmarks and engagement with rating agencies, such as, Carbon Disclosure Project (CDP), Sustainable Apparel Coalition Brand and Retail Module (SAC BRM), and S&amp;P Global</li><li>• Energy management system, Wattics, to monitor electricity and gas consumption at all sites under operational control</li><li>• FEM Higg Index to track sustainability performance of our supply chain</li><li>• Using EIM tool to track and encourage reduced water usage, and at finishing stages of our Own Brand Denim</li></ul>	<p><b>Fashion with Integrity FY21 Progress Update</b></p> <p><a href="#">VIEW</a></p>
Leadership review of monitoring and improvement results	<p>Environmental and sustainability performance is managed under our FWI programme. The ESG Committee receive quarterly updates on progress against FWI KPIs.</p>	<p><b>Fashion with Integrity</b></p> <p><a href="#">VIEW</a></p>
Audits or other steps to monitor and improve the environmental performance of companies in the supply chain	<p>We use FEM Higg Index to track the sustainability performance of our supply chain.</p>	

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

UNGC best practices	ASOS Examples	References
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><li>• Regulatory horizon scanning processes in place to ensure regulatory updates are captured, assessed and implemented</li></ul>	
Policy on anti-corruption regarding business partners	<p>All suppliers and partner brands are contractually obliged to comply with the Do the Right Thing – Code of Integrity and the Supplier Ethical Code. Suppliers and third parties are also provided with the Anti Bribery and Corruption (ABC) policy when onboarded.</p>	

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

UNGC best practices	ASOS Examples	References
Support by the organisation’s leadership for anti-corruption	The Executive Board are responsible for reviewing ‘Do the Right Thing – Code of Integrity’.	
Carrying out risk assessment of potential areas of corruption	Risk factors are considered and build into refreshed ABC policy and training.	Annual Report 2022 <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>• All employees have to complete annual ABC training</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></ul>	
Internal checks and balances to ensure consistency with the anti-corruption commitment	<ul style="list-style-type: none"><li>• All employees required to confirm they have read and understood the ABC policy</li><li>• Independent review of contracts by the legal team prior to signing. Third parties need to sign up to our policies incl. our Code of integrity which includes bribery and corruption</li><li>• ASOS’ accounting procedures include controls for the independent (from the requestor) review and approval of payments prior them being made</li><li>• Larger or manual (i.e., not automatically matched to purchase orders) payments require more senior review and approval per a delegation of authority</li><li>• Costs are subject to review either through pre-approval of budgets or regular monthly review and approval controls</li></ul>	Annual Report 2022 <a href="#">VIEW</a>

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

UNGC best practices ASOS Examples		References
Actions taken to encourage business partners to implement anti-corruption commitments	<ul style="list-style-type: none"><li>• All suppliers and partner brands are contractually obliged to comply with Do the Right Thing – Code of Integrity and Supplier Ethical Code</li><li>• Suppliers and partner brands are provided with the Anti Bribery and Corruption policy and the AML &amp; Anti Terrorism Financing policy</li></ul>	
Management responsibility and accountability for implementation of the anti-corruption commitment or policy	ASOS' General Counsel & Company Secretary is responsible for the ABC policy and training.	
Communications (whistleblowing) channels and follow-up mechanisms for reporting concerns or seeking advice	ASOS' approach to communications (whistleblowing) channels and follow-up mechanisms for reporting concerns or seeking advice is detailed in Criterion 21 'Establish channels to engage with employees and other stakeholders to hear their ideas and address their concerns, and protect 'whistle-blowers'.	
Internal accounting and auditing procedures related to anticorruption	<p>ASOS' accounting procedures include controls for the independent (from the requestor) review and approval of payments prior them being made. Larger or manual (i.e., not automatically matched to purchase orders) payments require more senior review and approval per a delegation of authority. Costs are subject to review either through pre-approval of budgets or regular monthly review and approval controls.</p> <p>We have an in-house independent Internal Audit function that reports into the Board's Audit Committee; this function was previously outsourced. As part of bringing the function in house the risk-based process for setting the annual Internal Audit Plan was updated, and now effectively focuses on the key risks to the business aligned to delivery of company strategy. Risks around bribery and corruption are included in the risk universe used when setting the Plan, hence assurance over controls in these areas may be included in internal audit's work on a risk basis.</p>	<div>Annual Report 2022</div> <div>VIEW</div>

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

UNGC best practices   ASOS Examples		References	
Leadership review of monitoring and improvement results	Outcomes from Spot are reported to the Audit Committee who have the right to review investigations if requested.	Annual Report 2022	<a href="#">VIEW</a>

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

UNGC best practices ASOS Examples		References
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.	<div>Annual Report 2022VIEW</div> <div>Fashion with IntegrityVIEW</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>• We are a signatory of Textiles 2030 and have signed the circular economy commitment</li><li>• We are a member of the Ellen MacArthur Foundation, committed to their Jeans Redesign Project and completion of the Circulytics report</li><li>• The ASOS South Asian Wedding Collection was designed to be more inclusive of our ASOS customers who attend South Asian weddings and occasions. The range was developed with the support of an in-house South Asian sounding board who advised on product design, studio considerations and marketing content, to ensure the project was culturally appropriate and relevant</li></ul>	<div>The South Asian Wedding CollectionVIEW</div>

16: The COP describes strategic social investments and philanthropy

UNGC best practices    ASOS Examples		References
Pursue social investments and philanthropic contributions that tie in with the core competencies or operating context of the company as an integrated part of its sustainability strategy	As part of our FWI strategy we invest in a range of social programmes. This year we’ve committed to a two-year partnership with the Safe Space Alliance, a charity connecting the LGBTQ+ communities with verified allied venues around the world. The two-year partnership and accompanying donation are all about supporting the sustainable growth of the organisation. This means helping raise awareness about the Safe Space Alliance, expanding its directory of safe spaces across as many locations as possible, and strengthening the safety interventions and support it offers members, with the overarching goal of improving mental health and wellbeing for LGBTQ+ communities globally.	<div>ASOS FoundationVIEW</div>
Coordinate efforts with other organisations and initiatives to amplify—and not negate or unnecessarily duplicate—the efforts of other contributors	We partner with a number of organisations and cross industry initiatives to deliver FWI and ASOS Foundation programmes. Follow the links for more information.	<div>ASOS FoundationVIEW</div> <div>Fashion with IntegrityVIEW</div>
Take responsibility for the intentional and unintentional effects of funding and have due regard for local customs, traditions, religions, and priorities of pertinent individuals and groups	We always work with established local partners/NGOs to help us design, implement and manage locally and culturally sensitive social and community programmes.	<div>ASOS FoundationVIEW</div> <div>PartnershipsVIEW</div>

17: The COP describes advocacy and public policy engagement

UNGC best practices    ASOS Examples		References
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>• Launch of Circular Design Guidebook to raise awareness of Circular design Strategies as an educational resource</li><li>• Committing to improving gender equality and reducing our Ethnicity and Gender Pay Gap</li><li>• We have publicly committed that 100% of our third-party brands will have signed the Transparency Pledge and share their Tier-1 supply chain by 2025. We launched our Modern Slavery E-Guide Book to all partner brands. This resource is designed to guide our brands through the process of embedding these principles in their own supply chains</li></ul>	<div>Ethnicity and Gender Pay Gap</div> <div>VIEW</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 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. In June, ASOS and ASI hosted a panel discussion at the GFS on the topic of migrant labour.</p> <p>We also take part in regular meetings with industry bodies and policymakers and respond to relevant government consultations, such as the International Sustainability Standards Board (ISSB) Exposure Draft Proposed IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information; and Exposure Draft Proposed IFRS S2 Climate-related Disclosures.</p>	<div>Global Fashion Agenda</div> <div>VIEW</div>

18: The COP describes partnerships and collective action

UNGC best practices ASOS Examples		References
Develop and implement partnership projects with public or private organisations (UN entities, government, NGOs, or other groups) on core business, social investments and/or advocacy	<p>We partner with a number of organisations and cross industry initiatives to deliver FWI and ASOS Foundation programmes. Some example from this year:</p> <ul style="list-style-type: none"><li>● We partnered with Fashion Minority Report (FMR), an organisation working to diversify the fashion industry by supporting the creative and professional development of young talent from marginalised and underrepresented groups. We have donated to partner with FMR on 3 projects; a learning hub to help young people learn employability skills and develop a better understanding of the industry, a mentorship programme designed to support young people from a lower socio-economic background or minority community who want to pursue a career in fashion, and a Secondary School Programme that will promote the fashion industry as a career path and unlock creative talent from an early age</li><li>● We signed a new three-year partnership to 2025 with Anti-Slavery International, the world’s oldest human rights organisation, to support ASOS in delivering its ambitious Fashion with Integrity programme. Anti-Slavery International has acted as ASOS’ ‘critical friend’ since 2017, providing advice, guidance and critique on ethical trade and tackling modern slavery, 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>● Two ASOSers completed the UNGC Young Innovator Programme. This programme gave our ASOSers the opportunity to collaborate with the other member groups as well as the UNGC team. The programme teaches key project management skills as well as workshopping innovations for sustainable developments</li></ul> <p>Please read more about our key partners via the Partnerships link.</p>	<div><div>Fashion with Integrity</div><div>VIEW</div></div> <div><div>ASOS Foundation</div><div>VIEW</div></div> <div><div>Partnerships</div><div>VIEW</div></div>
Join industry peers, UN entities and/ or other stakeholders in initiatives contributing to solving common challenges and dilemmas at the global and/or local levels with an emphasis on initiatives extending the company’s positive impact on its value chain	See above	See above

19: The COP describes CEO commitment and leadership

UNGC best practices ASOS Examples		References
CEO publicly delivers explicit statements and demonstrates personal leadership on sustainability and commitment to the UN Global Compact	<p>Our CEO and wider Executive team hold collective responsibility for delivery of our cross-functional FWI programme. The highest level of governance of FWI and wider ESG issues is the Board-level ESG Committee (described in more detail in Criterion 1).</p> <p>Our Plc website contains a page on ASOS’ membership of the UNGC and includes a statement of support for the initiative from ASOS CEO.</p> <p>Our CEO has also written forewords or statements for the following reports, communicating the importance to act on those topics:</p> <ul style="list-style-type: none"><li>• Gender and Ethnicity Pay Gap Report</li><li>• Fashion with Integrity Strategy Report and Progress Update</li><li>• Modern Slavery Statement</li></ul>	<div><div>Fashion with Integrity 2030 Strategy</div><div>VIEW</div></div> <div><div>Fashion with Integrity FY21 Progress Update</div><div>VIEW</div></div> <div><div>Modern Slavery Statement April 2021 – August 2022</div><div>VIEW</div></div> <div><div>Ethnicity and Gender Pay Gap</div><div>VIEW</div></div>
CEO promotes initiatives to enhance sustainability of the company’s sector and leads development of industry standards	See above	See above
CEO leads executive management team in development of corporate sustainability strategy, defining goals and overseeing implementation	See above	See above

20: The COP describes Board adoption and oversight

UNGC best practices    ASOS Examples		References
Board of Directors (or equivalent) assumes responsibility and oversight for long-term corporate sustainability strategy and performance	Our newly formed ESG Committee, a delegated body of Non-executive Directors, provides oversight on behalf of and to the ASOS Plc Board in relation to the Group’s ESG strategy and activities, including defining the Group’s ESG strategy, reviewing the practices and initiatives of the Group relating to ESG matters to ensure they remain effective and up to date, ensuring compliance with legal and regulatory requirements, including corporate governance principles and industry standards, applicable to the Group and ensuring all stakeholders receive appropriate information about the Group’s ESG activities.	ESG Committee <a href="#">VIEW</a>
Board establishes, where permissible, a committee or assigns an individual board member with responsibility for corporate sustainability.	See above	See above

21: The COP describes stakeholder engagement

UNGC best practices ASOS Examples		References
Publicly recognise 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 FWI reports and our Modern Slavery Statement.	<div>Annual Report 2022VIEW</div> <div>Fashion with IntegrityVIEW</div> <div>Modern Slavery Interim Statement April 2021 – May 2022VIEW</div> <div>Modern Slavery Statement April 2021 – August 2022VIEW</div>
Define sustainability strategies, goals and policies in consultation with key stakeholders	<p>The FWI 2030 strategy was developed following a materiality process and through engagement with critical friends. The materiality assessment was carried out by an external reporting expert in line with the industry standard approach to sustainability strategy development based on guidance provided by the Global Reporting Initiative (GRI) and the Sustainability Accounting Standards Board (SASB). The process involved engagement with employees, investors, global brand partners and suppliers, and human rights and fashion sustainability organisations, to identify the most important areas of focus for our strategy.</p> <p>Engagement with other key stakeholders includes the development of the Circular Design Guidebook with Centre for Sustainable Fashion (University Arts London), as well as engaging The Ellen MacArthur Foundation, Textiles 2030, H&amp;M, and PVH. We also collaborated with the Centre for Sustainable Fashion in the creation of an E-Guidebook for Partner Brands covering our minimum ethical and environmental requirements which was launched earlier this year.</p> <p>In January, we signed a new three-year partnership to 2025 with Anti-Slavery International, the world’s oldest human rights organisation, to support in delivering our ambitious FWI programme. Anti-Slavery International has acted as ASOS’ ‘critical friend’ since 2017, providing advice, guidance and critique on ethical trade and tackling modern slavery, 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.</p> <p>We continue to engage with critical friends ‘Fast Forward’ and the ‘Transparency Pledge’ to drive progress towards meeting our FWI goals and ensure transparency and fair treatment within our supply chains.</p>	<div>Fashion with IntegrityVIEW</div>

21: The COP describes stakeholder engagement

UNGC best practices ASOS Examples		References
Consult stakeholders in dealing with implementation dilemmas and challenges and invite them to take active part in reviewing performance	We seek to incorporate the views of key stakeholders when designing and reviewing our FWI programmes. Follow the links for further information.	<div>Fashion with IntegrityVIEW</div>
Establish channels to engage with employees and other stakeholders to hear their ideas and address their concerns, and protect 'whistle-blowers'	<p>We have a number of channels in place to engage with key stakeholders.</p> <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 in a timely manner</li><li>• We raise awareness of these mechanisms through internal communications channels including screens around the office and regular email communications to all employees</li></ul> <p>For supply chain workers:</p> <ul style="list-style-type: none"><li>• We have country-specific helplines including the Accord (RSC) in Bangladesh</li><li>• 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></ul>	<div>Whistleblowing PolicyVIEW</div> <div>Modern Slavery Interim Statement April 2021 – May 2022VIEW</div> <div>Modern Slavery Statement April 2021 – August 2022VIEW</div>

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