

The background of the image is a dense, pixelated pattern of black and white squares, creating a noisy, digital texture. In the center of the image, the word "asos" is written in a clean, white, lowercase sans-serif font. The letters are bold and stand out prominently against the dark, busy background.

asos

# **United Nations Global Compact Advanced Communication On Progress**

**2019 – 2020**

# Chief Executive Statement of Support

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Dear Mr Secretary-General

For the last two decades, the UN Global Compact (UNGC) has been a driving force in raising global business sustainability standards, and we would like to congratulate all those involved with the UNGC on reaching this milestone 20-year anniversary.

In this, our eighth Communication on Progress (COP), we demonstrate the progress ASOS has made to further integrate the UNGC principles within our business strategy, culture, and day-to-day company operations. This year, we have also included information in our COP on how we are supporting the achievement of the Sustainable Development Goals (SDGs) through our corporate responsibility programme, Fashion with Integrity.

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.

The UNGC and SDG frameworks are needed now more than ever to help us address the most critical issues of our time, such as climate change, inequality and the COVID-19 crisis.

We are committed to taking them further into the heart of how we work, to strengthen our business, protect all those working on behalf of ASOS and to regenerate our local communities and the environment.

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






Nick Beighton  
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 and states the related Sustainable Development Goals (SDGs) we are supporting.

# Implementing the ten principles into strategies & operations



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

| UNGC best practices   | ASOS Examples  | References          | Related SDGs  |
|---|--|---------------------|---|
| Place responsibility for execution of sustainability strategy in relevant corporate functions (procurement, government affairs, human resources, legal, etc.) ensuring no function conflicts with company’s sustainability commitments and objectives | We are in the process of critically assessing our corporate responsibility programme, Fashion with Integrity (FWI), and how it is governed internally. This piece of work is being led by our newly appointed Chief Strategy Officer with support from our CEO. During this review period, we are holding regular, cross-departmental calls and meetings to make sure all key stakeholders continue to be engaged with the existing FWI strategy and performance. Ensuring all key stakeholders and departments understand their responsibilities for delivering sustainability is integral to the successful implementation of our FWI strategy and governance project. | <a href="#">FWI</a> |   |
| Assign responsibility for corporate sustainability implementation to an individual or group within each business unit and subsidiary  | See above  | <a href="#">FWI</a> |  |
| Ensure that different corporate functions coordinate closely to maximize performance and avoid unintended negative impacts  | See above  | <a href="#">FWI</a> |  |






2: The COP describes value chain implementation

| UNGC best practices  | ASOS Examples   | References  | Related SDGs |
|--|---|---|--------------|
| 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></ul> | <p><b><u>FWI</u></b></p> <p><b><u>ASOS SUPPLY CHAIN</u></b></p> <p><b><u>ETHICAL TRADE</u></b></p> <p><b><u>SUSTAINABLE SOURCING</u></b></p> <p><b><u>MODERN SLAVERY STATEMENT</u></b></p> <p><b><u>THIRD PARTY PROGRAMME</u></b></p> |              |
| 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 link 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>  | <p><b><u>ASOS REPORTING &amp; POLICIES</u></b></p> <p><b><u>ETHICAL TRADE</u></b></p> <p><b><u>MODERN SLAVERY STATEMENT</u></b></p> <p><b><u>THIRD PARTY PROGRAMME</u></b></p>  |              |

| UNGC best practices  | ASOS Examples   | References   | Related SDGs  |
|--|---|--|---|
| 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>In the last financial year, together with third-party auditors, we carried out 381 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></ul> | <p><b><u>ETHICAL TRADE</u></b></p> <p><b><u>SUSTAINABLE SOURCING</u></b></p> <p><b><u>MODERN SLAVERY STATEMENT</u></b></p> <p><b><u>THIRD PARTY PROGRAMME</u></b></p>  |    |
| 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>   | <p><b><u>ETHICAL TRADE</u></b></p> <p><b><u>SUSTAINABLE SOURCING</u></b></p> <p><b><u>MODERN SLAVERY STATEMENT</u></b></p> <p><b><u>THIRD PARTY PROGRAMME</u></b></p> <p><b><u>ETHICAL TRADE PARTNERSHIPS</u></b></p> <p><b><u>SUSTAINABLE SOURCING PARTNERSHIPS</u></b></p> |  |





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




| UNGC best practices  | ASOS Examples  | References   | Related SDGs  |
|--|--|--|---|
| Commitment to comply with all applicable laws and respect internationally recognized human rights, wherever the company operates (e.g., the Universal Declaration of Human Rights, Guiding Principles on Human Rights) | <ul style="list-style-type: none"><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.</li><li>Our 5MRs for third-party brands are based on internationally-recognised standards and legislation like the Ethical Trading Initiative Base Code and UK Modern Slavery Act.</li></ul> | <p><b><u>ASOS REPORTING &amp; POLICIES</u></b></p> <p><b><u>ASOS UN GLOBAL COMPACT</u></b></p> <p><b><u>ETHICAL TRADE</u></b></p> <p><b><u>THIRD PARTY PROGRAMME</u></b></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>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 (not publicly available)</li><li>Accommodation Guidelines (not publicly available)</li></ul>   | <p><b><u>ASOS REPORTING &amp; POLICIES</u></b></p> <p><b><u>ETHICAL TRADE</u></b></p> <p><b><u>MODERN SLAVERY STATEMENT</u></b></p>  |  |
| Statement of policy stipulating human rights expectations of personnel, business partners and other parties directly linked to operations, products or services  | <p>We have a number of policies stipulating our human rights expectations:</p> <ul style="list-style-type: none"><li>Supplier Ethical Code (including for non-stock and third-party brands)</li><li>Child Labour Remediation and Young Worker Policy</li><li>Migrant and Contract Labour Policy</li><li>Modern Slavery Statement</li><li>Third-Party Brand Minimum Requirements</li><li>Homeworker Policy (not publicly available)</li><li>Accommodation Guidelines (not publicly available)</li></ul>                       | <p><b><u>ASOS REPORTING &amp; POLICIES</u></b></p> <p><b><u>ETHICAL TRADE</u></b></p> <p><b><u>MODERN SLAVERY STATEMENT</u></b></p> <p><b><u>THIRD PARTY PROGRAMME</u></b></p> |  |




|  |   |                                      |   |
|--|---|--------------------------------------|---|
| Statement of policy publicly available and communicated internally and externally to all personnel, business partners and other relevant parties | Our policies and statements are all available on our public Plc website. Employees and supply chain partners are regularly engaged on these policies through internal communications, training, a monthly supplier newsletter, close relationship management and in country regional conferences. | <b>ASOS REPORTING &amp; POLICIES</b> |  |
|--|---|--------------------------------------|---|

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

| UNGC best practices   | ASOS Examples  | References  | Related SDGs  |
|---|--|---|---|
| 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>                                   | <b><u>ETHICAL TRADE</u></b><br><br><b><u>THIRD PARTY PROGRAMME</u></b>    |   |
| 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> | <b><u>ETHICAL TRADE</u></b><br><br><b><u>MODERN SLAVERY STATEMENT</u></b> |  |





| UNGC best practices   | ASOS Examples  | References   | Related SDGs  |
|---|--|--|---|
| 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>  | <p><b><u>ETHICAL TRADE</u></b></p> <p><b><u>MODERN SLAVERY STATEMENT</u></b></p> |    |
| 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>   | <p><b><u>ETHICAL TRADE</u></b></p> <p><b><u>MODERN SLAVERY STATEMENT</u></b></p> |    |
| Operational-level grievance mechanisms for those potentially impacted by the company's activities | <ul style="list-style-type: none"><li>We have a number of formal and informal feedback mechanisms across our operations:</li><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 confidentially 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></ul> | <p><b><u>ETHICAL TRADE</u></b></p> <p><b><u>ASOS BUSINESS INTEGRITY</u></b></p>  |  |





| UNGC best practices  | ASOS Examples   | References   | Related SDGs  |
|--|---|--|---|
| 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>   | <b><u>MODERN SLAVERY STATEMENT</u></b>   |    |
| 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 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> | <b><u>MODERN SLAVERY STATEMENT</u></b><br><br><b><u>ASOS CHILD LABOUR POLICY</u></b><br><br><b><u>ETHICAL TRADE</u></b>  |    |
| 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. Follow the partnership link for more information.</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 events at the House of Lords.</li></ul>   | <b><u>ETHICAL TRADE</u></b><br><br><b><u>ETHICAL TRADE PARTNERSHIPS</u></b><br><br><b><u>MODERN SLAVERY STATEMENT</u></b><br><br><b><u>THIRD PARTY PROGRAMME</u></b> |  |



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

| UNGC best practices  | ASOS Examples  | References  | Related SDGs  |
|--|--|---|---|
| System to monitor the effectiveness of human rights policies and implementation with quantitative and qualitative metrics, including in the supply chain | <ul style="list-style-type: none"><li>• 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>   | <p><b><u>ETHICAL TRADE PROGRAMME</u></b></p> <p><b><u>MODERN SLAVERY STATEMENT</u></b></p> <p><b><u>ETHICAL TRADE PARTNERSHIPS</u></b></p> <p><b><u>SUPPLIER ETHICAL CODE</u></b></p> |    |
| Monitoring drawn from internal and external feedback, including affected stakeholders  | <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></ul> | <p><b><u>FASHION TRANSPARENCY</u></b></p> <p><b><u>ETHICAL TRADE PROGRAMME</u></b></p> <p><b><u>MODERN SLAVERY STATEMENT</u></b></p>  |  |







| UNGC best practices   | ASOS Examples   | References  | Related SDGs  |
|---|---|---|---|
| Leadership review of monitoring and improvement results   | We report Sourcing, Ethical Trade, Sustainability and Branded Responsible Sourcing performance to the Executive Board on a quarterly basis.   | <b><u>MODERN SLAVERY STATEMENT</u></b>  |    |
| 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.</li><li>• ASOS' audit and 'beyond audit' approach sets out high ethical standards, ensuring thorough assessments and support to our suppliers to help remediate any issues found.</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>   | <b><u>MODERN SLAVERY STATEMENT</u></b><br><b><u>ETHICAL TRADE PROGRAMME</u></b><br><b><u>ASOS CHILD LABOUR POLICY</u></b> |    |
| Grievance mechanisms that are legitimate, accessible, predictable, equitable, transparent, rights compatible, a source of continuous learning, and based on engagement and dialogue | <ul style="list-style-type: none"><li>• We have a number of formal and informal feedback mechanisms across our operations:</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 confidentially 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></ul> | <b><u>MODERN SLAVERY STATEMENT</u></b><br><b><u>ASOS BUSINESS INTEGRITY</u></b>   |  |
| 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.   | <b><u>MODERN SLAVERY STATEMENT</u></b>  |  |

Criterion 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, Child Labour Remediation and Young Worker Policy, Migrant and Contract Worker Policy, Homeworker Policy (not publicly available) and 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> | <p><b><u>ASOS REPORTING &amp; POLICIES</u></b></p> <p><b><u>ETHICAL TRADE PROGRAMME</u></b></p> <p><b><u>MODERN SLAVERY STATEMENT</u></b></p> <p><b><u>THIRD PARTY PROGRAMME</u></b></p> |              |
| Reflection on the relevance of the labour principles for the company   | Our Modern Slavery Statements reflect on the relevance of labour principles to our business.  | <p><b><u>MODERN SLAVERY STATEMENT</u></b></p>  |              |
| 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></ul> <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><b><u>ASOS REPORTING &amp; POLICIES</u></b></p> <p><b><u>ASOS GFA</u></b></p>   |              |






| UNGC best practices  | ASOS Examples   | References  | Related SDGs  |
|--|---|---|---|
| Inclusion of reference to the principles contained in the relevant international labour standards in contracts with suppliers and other relevant business partners   | All suppliers are contractually obliged to comply with the following policies: <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>• ASOS requires all new third-party brands to meet our 5MRs at the onboarding stage.</li></ul>  | <b><u>ASOS REPORTING &amp; POLICIES</u></b><br><br><b><u>THIRD PARTY PROGRAMME</u></b>  |    |
| 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>• 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 with the policy</li><li>• Our Customer FWI Pillar focusses on disability, diversity, LGBTQ+ and gender equality.</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> | <b><u>ASOS REPORTING &amp; POLICIES</u></b><br><br><b><u>ASOS GFA</u></b><br><br><b><u>ASOS FOUNDATION</u></b><br><br><b><u>ETHICAL TRADE PROGRAMME</u></b> |    |
| Participation and leadership in wider efforts by employers' organizations (international and national levels) to jointly address challenges related to labour standards in the countries of operation, possibly in a tripartite approach (business – trade union – government).  | We participate in a number of initiatives to collaboratively address labour standard challenges. Follow the partnership link for more information.  | <b><u>ETHICAL TRADE PROGRAMME</u></b>   |  |
| 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.  | <b><u>ASOS GFA</u></b>  |  |



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 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. We carried out 381 unannounced audits during the last financial year.</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><li>• We publish a Modern Slavery Statement annually.</li></ul> | <p><u>ETHICAL TRADE PROGRAMME</u></p> <p><u>ETHICAL TRADE PARTNERSHIPS</u></p> <p><u>MODERN SLAVERY STATEMENT</u></p> <p><u>THIRD PARTY PROGRAMME</u></p> |              |
| 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>• 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></ul>  | <p><u>ASOS GFA</u></p>  |              |
| 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>• 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>                                  | <p><u>ETHICAL TRADE PROGRAMME</u></p> <p><u>MODERN SLAVERY STATEMENT</u></p>  |              |



| UNGC best practices  | ASOS Examples   | References   | Related SDGs  |
|--|---|--|---|
| 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></ul> | <p><b><u>ETHICAL TRADE PROGRAMME</u></b></p> <p><b><u>MODERN SLAVERY STATEMENT</u></b></p>   |    |
| 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.</li><li>We conducted a series of modern slavery focused webinars in collaboration with the Ethical Trading initiative for our Chinese suppliers on the Modern Slavery Act and modern slavery risk in supply chains.</li><li>We participate in a number of initiatives aimed at building supplier capacity. Follow the links for further information.</li></ul>  | <p><b><u>ETHICAL TRADE PROGRAMME</u></b></p> <p><b><u>MODERN SLAVERY STATEMENT</u></b></p> <p><b><u>ETHICAL TRADE PARTNERSHIPS</u></b></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. | 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.   | <p><b><u>MODERN SLAVERY STATEMENT</u></b></p>  |  |






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

| UNGC best practices   | ASOS Examples  | References   | Related SDGs |
|---|--|--|--------------|
| 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.   | <b><u>ETHICAL TRADE PROGRAMME</u></b><br><br><b><u>MODERN SLAVERY STATEMENT</u></b>    |              |
| 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>   | <b><u>MODERN SLAVERY STATEMENT</u></b><br><br><b><u>ETHICAL TRADE PARTNERSHIPS</u></b> |              |
| 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 381 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> | <b><u>ETHICAL TRADE PROGRAMME</u></b><br><br><b><u>MODERN SLAVERY STATEMENT</u></b>    |              |





| UNGC best practices  | ASOS Examples   | References   | Related SDGs  |
|--|---|--|---|
| Process to positively engage with the suppliers to address the challenges (i.e., partnership approach instead of corrective approach) through schemes to improve workplace practices | <ul style="list-style-type: none"><li>As part of the 'Fast Forward' programme, all our UK suppliers to participate in a workshop that sets out our Ethical Standards and processes that suppliers can use to achieve them.</li><li>We participate in a number of initiatives aimed at improving ethical supply chain practices. Follow the links for further information.</li></ul> | <p><b><u>ETHICAL TRADE PROGRAMME</u></b></p> <p><b><u>MODERN SLAVERY STATEMENT</u></b></p> <p><b><u>ETHICAL TRADE PARTNERSHIPS</u></b></p> |  |
| Outcomes of integration of the Labour principles [report main incidences]  | 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><b><u>MODERN SLAVERY STATEMENT</u></b></p>  |  |




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, ASOS Animal Welfare Policy.</li></ul>   | <p><b><u>ASOS ENVIRONMENTAL POLICY</u></b></p> <p><b><u>ASOS REPORTING &amp; POLICIES</u></b></p>                                       |    |
| 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, ASOS Animal Welfare 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> | <p><b><u>ASOS REPORTING &amp; POLICIES</u></b></p> <p><b><u>SUSTAINABLE SOURCING</u></b></p> <p><b><u>THIRD PARTY PROGRAMME</u></b></p> |   |
| Specific commitments and goals for specified years  | Follow the links to for a comprehensive list of our environment and sustainable sourcing commitments and our performance against these targets.  | <p><b><u>PERFORMANCE &amp; COMMITMENTS</u></b></p> <p><b><u>CARBON REPORT</u></b></p> <p><b><u>PROJECT PIPELINE</u></b></p>             |  |



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>Environmental impact assessment of our apparel supply chain through Sustainable Apparel Coalition’s Higg Index FEM</li><li>Due diligence screening and testing to ensure compliance with our chemical policy and RSL</li><li>Supplier scorecards provide buyers with a summary of a supplier’s sustainability data to inform their sourcing decisions.</li></ul> | <p><b><u>SUSTAINABLE SOURCING PROGRAMME</u></b></p> <p><b><u>SUSTAINABLE SOURCING PARTNERSHIPS</u></b></p> <p><b><u>CARBON REPORT</u></b></p> <p><b><u>PROJECT PIPELINE</u></b></p> <p><b><u>CARBON AND ENERGY</u></b></p> |    |
| Assessments of lifecycle impact of products, ensuring environmentally sound management policies | <ul style="list-style-type: none"><li>We use the Sustainable Clothing Action Plan’s assessment tool to calculate ASOS Brands products’ environmental footprint and Sustainable Apparel Coalition’s Higg Index FEM to assess the environmental impact of our supply chain.</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>  | <p><b><u>SUSTAINABLE SOURCING PROGRAMME</u></b></p> <p><b><u>SUSTAINABLE SOURCING PARTNERSHIPS</u></b></p> <p><b><u>ASOS PACKAGING</u></b></p>   |  |



| UNGC best practices   | ASOS Examples   | References   | Related SDGs  |
|---|---|--|---|
| 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 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>• Incorporating FWI into the new ASOS Leadership programme and supporting events</li><li>• Environmental volunteering opportunities</li><li>• Retail training: Sustainable Fashion Academy, sustainable sourcing, including animal welfare, chemical management, circular fashion and sustainable raw materials</li><li>• Supplier scorecards to provide buyers with a summary of a supplier’s sustainability data to inform their sourcing decisions.</li><li>• Animal welfare training workshops to press and customer care teams</li><li>• Branded Champions from among buyers and merchandisers in business to raise the profile of FWI.</li></ul> | <p><b><u>ASOS REPORTING &amp; POLICIES</u></b></p> <p><b><u>SUSTAINABLE SOURCING PROGRAMME</u></b></p> <p><b><u>THIRD PARTY PROGRAMME</u></b></p> <p><b><u>SUSTAINABLE SOURCING PARTNERSHIPS</u></b></p> <p><b><u>ASOS PACKAGING</u></b></p> |    |
| Grievance mechanisms, communication channels and other procedures (e.g. whistle-blower mechanisms) for reporting concerns or seeking advice regarding environmental impacts | <p>We have a number of formal and informal feedback mechanisms across our operations:</p> <ul style="list-style-type: none"><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 confidentially 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>   | <p><b><u>MODERN SLAVERY STATEMENT</u></b></p> <p><b><u>ASOS BUSINESS INTEGRITY</u></b></p>   |  |





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

| UNGC best practices   | ASOS Examples   | References  | Related SDGs  |
|---|---|---|---|
| System to track and measure performance based on standardized performance metrics | <p>System to track and measure performance based on standardized performance metrics.</p> <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>• Supplier sustainability scorecards</li><li>• Sustainable Apparel Coalition’s Higg Index to track sustainability performance of our supply chain</li><li>• Wet processing benchmarking tool for denim</li><li>• SCAP’s assessment tool to calculate ASOS Brands products’ environmental footprint.</li><li>• Cotton tracker for sustainable cotton</li><li>• Interlink to evaluate suppliers’ chemical compliance</li></ul> | <p><b><u>CARBON REPORT</u></b></p> <p><b><u>ASOS REPORTING &amp; POLICIES</u></b></p> <p><b><u>ASOS PACKAGING</u></b></p> <p><b><u>SUSTAINABLE SOURCING PROGRAMME</u></b></p> <p><b><u>THIRD PARTY PROGRAMME</u></b></p> <p><b><u>SUSTAINABLE SOURCING PARTNERSHIPS</u></b></p> |    |
| Leadership review of monitoring and improvement results                           | We regularly report environmental and sustainability performance to the Executive Directors.  |   |  |






| UNGC best practices   | ASOS Examples   | References  | Related SDGs  |
|---|---|---|---|
| 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>• Supplier sustainability scorecards</li><li>• Sustainable Apparel Coalition’s Higg Index to track sustainability performance of our supply chain</li><li>• Wet processing benchmarking tool for denim</li><li>• SCAP’s assessment tool to calculate ASOS Brands products’ environmental footprint.</li><li>• Cotton tracker for sustainable cotton</li><li>• Interlink to evaluate suppliers’ chemical compliance</li></ul> | <p><b><u>CARBON REPORT</u></b></p> <p><b><u>ASOS REPORTING &amp; POLICIES</u></b></p> <p><b><u>CARBON REPORT</u></b></p> <p><b><u>ASOS PACKAGING</u></b></p> <p><b><u>SUSTAINABLE SOURCING PROGRAMME</u></b></p> <p><b><u>SUSTAINABLE SOURCING PARTNERSHIPS</u></b></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> | <u><b>ASOS BUSINESS INTEGRITY</b></u>  |    |
| 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>  | <u><b>ASOS REPORTING &amp; POLICIES</b></u><br><br><u><b>ASOS BUSINESS INTEGRITY</b></u> |  |
| Detailed policies for high-risk areas of corruption   | The ASOS Group Tax Strategy sets out our approach to managing tax risks.   | <u><b>ASOS GROUP TAX STRATEGY</b></u>  |  |
| 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.  | <u><b>ASOS REPORTING &amp; POLICIES</b></u><br><br><u><b>ETHICAL TRADE PROGRAMME</b></u> |  |




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.   | <u><b>ASOS BUSINESS INTEGRITY</b></u>  |    |
| 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.  | <u><b>ASOS ANNUAL REPORT 2019</b></u>  |    |
| 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> | <u><b>ASOS BUSINESS INTEGRITY</b></u>  |  |
| 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.  | <u><b>ASOS ANNUAL REPORT 2019</b></u>  |  |
| 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>  | <u><b>ASOS BUSINESS INTEGRITY</b></u><br><u><b>ETHICAL TRADE PROGRAMME</b></u> |  |



| UNGC best practices   | ASOS Examples  | References   | Related SDGs  |
|---|--|--|---|
| 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.  | <u>ASOS BUSINESS INTEGRITY</u>   |    |
| 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 confidentially 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> | <p><u>MODERN SLAVERY STATEMENT</u></p> <p><u>ASOS BUSINESS INTEGRITY</u></p> |    |
| Internal accounting and auditing procedures related to anticorruption                                       | Deloitte completes an internal audit of our business annually which includes a review of our anti-bribery and corruption measures.   | <u>ASOS ANNUAL REPORT 2019</u>   |  |



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> | <u>ASOS ANNUAL REPORT 2019</u> |    |
| Process to deal with incidents                                      | We have a crisis management communication tool in place across all of our global sites.   |                                |   |
| Use of independent external assurance of anti-corruption programmes | Deloitte completes an internal audit of our business annually which includes a review of our anti-bribery and corruption measures.  | <u>ASOS ANNUAL REPORT 2019</u> |  |

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, Our Products, Our Business, Our Customers and Our Community and the programmes of the ASOS Foundation drive our approach to business and all align with one or more of the SDGs.  | <u>OUR PRODUCTS</u><br><u>OUR BUSINESS</u><br><u>OUR CUSTOMERS</u><br><u>OUR COMMUNITY</u><br><u>ASOS FOUNDATION</u> |   |
| Develop relevant products and services or design business models that contribute to UN goals/issues | <ul style="list-style-type: none"><li>Some examples of the products and services we have developed include:</li><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>Circular economy strategy: As a signatory to the 2020 Circular Fashion System commitment we've committed to four circular fashion targets relating to products, packaging and recycling waste.</li><li>In September 2020 we launched our first ever Circular Collection centred around circular design principles.</li><li>In response to the COVID-19 pandemic, we have worked to raise over £500,000 for charities supporting those vulnerable to the crisis via fundraising products sold on ASOS.com</li></ul> | <u>MADE IN KENYA</u><br><u>OUR PRODUCTS</u><br><u>ASOS GFA</u><br><u>INCLUSION PARTNERSHIP</u>                       |  |

16: The COP describes strategic social investments and philanthropy



| UNGC best practices   | ASOS Examples  | References   | Related SDGs |
|---|--|--|--------------|
| Pursue social investments and philanthropic contributions that tie in with the core competencies or operating context of the company as an integrated part of its sustainability strategy     | As part of our FWI strategy we invest in a range of social programmes. Follow the links for more information.  | <u><b>ASOS FOUNDATION</b></u><br><u><b>ETHICAL TRADE PARTNERSHIPS</b></u><br><u><b>SUSTAINABLE SOURCING PARTNERSHIPS</b></u><br><u><b>COMMUNITY PROGRAMMES</b></u><br><u><b>INCLUSION PARTNERSHIP</b></u><br><u><b>MIND AND BODY</b></u> |              |
| Coordinate efforts with other organizations and initiatives to amplify—and not negate or unnecessarily duplicate—the efforts of other contributors  | We partner with a number of organisations and cross industry initiatives to deliver FWI and ASOS Foundation programmes. Follow the links for more information. | <u><b>ASOS FOUNDATION</b></u><br><u><b>ETHICAL TRADE PARTNERSHIPS</b></u><br><u><b>SUSTAINABLE SOURCING PARTNERSHIPS</b></u><br><u><b>COMMUNITY PROGRAMMES</b></u><br><u><b>INCLUSION PARTNERSHIP</b></u><br><u><b>MIND AND BODY</b></u> |              |
| 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.  | <u><b>ASOS FOUNDATION</b></u><br><u><b>ETHICAL TRADE PARTNERSHIPS</b></u><br><u><b>SUSTAINABLE SOURCING PARTNERSHIPS</b></u>   |              |






17: The COP describes advocacy and public policy engagement

| UNGC best practices  | ASOS Examples  | References  | Related SDGs  |
|--|--|---|---|
| Publicly advocate the importance of action in relation to one or more UN goals/issues  | <ul style="list-style-type: none"><li>Some examples from the last year include:</li><li>Publicly supporting the Black Lives Matter movement and making donations to relevant charities</li><li>Committing to improving gender equality and reducing our Gender Pay Gap</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</li><li>Developing programmes supporting the Global Framework Agreement with IndustriALL Global trade union.</li></ul> | <p><b><u>INCLUSION PARTNERSHIP</u></b></p> <p><b><u>ASOS GENDER PAY GAP REPORT</u></b></p> <p><b><u>ETHICAL TRADE PROGRAMME</u></b></p> <p><b><u>TRANSPARENCY</u></b></p> |    |
| Commit company leaders to participate in key summits, conferences, and other important public policy interactions in relation to one or more UN goals/issues | Senior leaders in the business host and participate in government roundtables, evidence sessions, inquiries 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><b><u>ASOS MODERN SLAVERY HOUSE OF LORDS</u></b></p> <p><b><u>GLOBAL FASHION AGENDA</u></b></p> <p><b><u>OECD DUE DILIGENCE IN TEXTILE SOURCING</u></b></p>            |  |

18: The COP describes partnerships and collective action




| UNGC best practices   | ASOS Examples  | References  | Related SDGs  |
|---|--|---|---|
| Develop and implement partnership projects with public or private organizations (UN entities, government, NGOs, or other groups) on core business, social investments and/or advocacy   | We partner with a number of organisations and cross industry initiatives to deliver FWI and ASOS Foundation programmes. Follow the links for more information. | <p><u><b>ASOS FOUNDATION</b></u></p> <p><u><b>ETHICAL TRADE PARTNERSHIPS</b></u></p> <p><u><b>SUSTAINABLE SOURCING PARTNERSHIPS</b></u></p> <p><u><b>COMMUNITY PROGRAMMES</b></u></p> <p><u><b>INCLUSION PARTNERSHIP</b></u></p> <p><u><b>MIND AND BODY</b></u></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 | See above  | <p><u><b>See above</b></u></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 Nick Beighton.</li><li>Nick has also written forewords or statements for the following reports, communicating the importance to act on those topics:</li><li>Gender Pay Gap Report</li><li>Carbon Emission Report</li><li>Modern Slavery Statement</li></ul>  | <p><b>UNGC</b></p> <p><b><u>ASOS GENDER PAY GAP REPORT</u></b></p> <p><b><u>CARBON REPORT</u></b></p> <p><b><u>MODERN SLAVERY STATEMENT</u></b></p> |    |
| CEO promotes initiatives to enhance sustainability of the company’s sector and leads development of industry standards                   | See above  | <p><b>UNGC</b></p> <p><b><u>ASOS GENDER PAY GAP REPORT</u></b></p> <p><b><u>CARBON REPORT</u></b></p> <p><b><u>MODERN SLAVERY STATEMENT</u></b></p> |  |
| CEO leads executive management team in development of corporate sustainability strategy, defining goals and overseeing implementation    | We are in the process of critically assessing our corporate responsibility programme, Fashion with Integrity (FWI), and how it is governed internally. This piece of work is being led by our newly appointed Chief Strategy Officer with support from our CEO. During this review period, we are holding regular, cross-departmental calls and meetings to make sure all key stakeholders continue to be engaged with the existing FWI strategy and performance. Ensuring all key stakeholders and departments understand their responsibilities for delivering sustainability is integral to the successful implementation of our FWI strategy and governance project. | <p><b>FWI</b></p>   |  |




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   | We are in the process of critically assessing our corporate responsibility programme, Fashion with Integrity (FWI), and how it is governed internally. This piece of work is being led by our newly appointed Chief Strategy Officer with support from our CEO. During this review period, we are holding regular, cross-departmental calls and meetings to make sure all key stakeholders continue to be engaged with the existing FWI strategy and performance. Ensuring all key stakeholders and departments understand their responsibilities for delivering sustainability is integral to the successful implementation of our FWI strategy and governance project. | <u>FWI</u>  |    |
| Board establishes, where permissible, a committee or assigns an individual board member with responsibility for corporate sustainability. | See above  | <u>FWI</u>  |  |
| Board (or committee), where permissible, approves formal reporting on corporate sustainability (Communication on Progress)                | The Executive Board signs off the corporate responsibility section of our Annual Report and formally approves ASOS' Modern Slavery Statement.  | <u>ASOS REPORTING &amp; POLICIES</u><br><u>MODERN SLAVERY STATEMENT</u> |  |

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.   | <b>ASOS REPORTING &amp; POLICIES</b>   |    |
| Define sustainability strategies, goals and policies in consultation with key stakeholders   | <ul style="list-style-type: none"><li>We regularly consult with stakeholders on the development of key corporate responsibility strategies and policies. Some examples include:</li><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>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</li></ul> | <b>STAKEHOLDER ENGAGEMENT</b><br><b>MODERN SLAVERY STATEMENT</b><br><b>INCLUSION PARTNERSHIP</b><br><b>THIRD PARTY PROGRAMME</b><br><b>CARBON REPORT</b><br><b>TRANSPARENCY</b>  |   |
| 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.   | <b>STAKEHOLDER ENGAGEMENT</b><br><b>MODERN SLAVERY STATEMENT</b><br><b>INCLUSION PARTNERSHIP</b><br><b>MIND AND BODY</b><br><b>ENVIRONMENT</b><br><b>ETHICAL TRADE PARTNERSHIPS</b><br><b>SUSTAINABLE SOURCING PARTNERSHIPS</b><br><b>COMMUNITY PROGRAMMES</b> |  |

| UNGC best practices  | ASOS Examples  | References   | Related SDGs  |
|--|--|--|---|
| Establish channels to engage with employees and other stakeholders to hear their ideas and address their concerns, and protect ‘whistle-blowers’ | <ul style="list-style-type: none"><li>• We have a number of channels in place to engage with key stakeholders:</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 confidentially 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></ul> | <p><b><u>MODERN SLAVERY STATEMENT</u></b></p> <p><b><u>ASOS BUSINESS INTEGRITY</u></b></p> |  |



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