

ASOS Interim Modern Slavery Statement –

April 2021 – May 2022

To better align our modern slavery reporting with our financial year-end, we'll be publishing a full, in-depth sixth modern slavery statement in August 2022. In the interim, we're publishing this brief statement to present key updates since our detailed fifth Modern Slavery Statement, which was published in April 2021.

This interim statement covers the period from February 2021 to May 2022. More detail on each of the points it contains will be provided in our August 2022 statement.

About ASOS

ASOS is a destination for fashion-loving 20-somethings around the world, with a purpose to give its customers the confidence to be whoever they want to be. Through its app and mobile/desktop web experience, available in ten languages and in over 200 markets, ASOS customers can shop a curated edit of over 100,000 products, sourced from nearly 900 global and local partner brands alongside a mix of fashion-led own-brand labels - ASOS Design, ASOS Edition, ASOS 4505, Collusion, Reclaimed Vintage, Topshop, Topman, Miss Selfridge and HIIT. ASOS aims to give all of its customers a truly frictionless experience, with an ever-greater number of different payment methods and hundreds of local delivery and return options, including Next-Day Delivery and Same-Day Delivery, dispatched from state-of-the-art fulfilment centres in the UK, US and Germany.

Our supply chain

Our ASOS brands products are designed in-house, manufactured by third-party supplier factories, and sold on our platforms. Product supply chains are complex, involving several different manufacturing processes.

We're committed to building full visibility of our supply chain and have currently mapped tiers 1 - 3, with targets in place to map tiers 4 and 5. ASOS maps and describes them as follows:

Supplier and factory data as of May 2022:

- 27 source countries
- 228 suppliers
- 1,061 factories (tiers 1 3)
- 209,005 workers (56% female, 44% male, 6% migrant)

Factory list:

- Factory list updated quarterly
- Supply chain on the Open Apparel Registry

Fashion with Integrity: 2030 programme

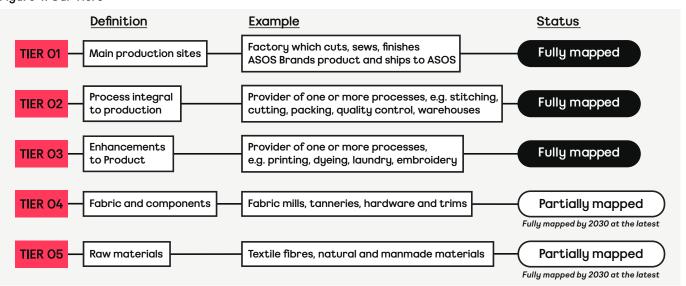
Fashion with Integrity guides our approach to business at ASOS. Since 2010, it's been our programme for moving us forward in a more responsible and sustainable way. In 2021, we launched an updated 2030 strategy, focused on delivering positive benefits for **people** and minimising our impact on the planet. This is underpinned by four big goals: Be Net Zero, Be More Circular, Be Transparent, Be Diverse.

Through Be Transparent, we'll accelerate progress on transparency and human rights within our own supply chain and the wider fashion industry. We've committed to providing full public transparency of every own-brand product sold on ASOS by 2030 and ensuring 100% of third-party brands have signed up to the Transparency Pledge by 2025. Through our risk assessment process, we have also identified vulnerable groups to modern slavery which has informed our prevention and mitigation strategies. This will be reflected through a detailed public-facing human rights strategy released each year from 2023, where we'll also set out our plans to deliver benefits for people by empowering women in the supply chain, to further support freedom of association, and to work to achieve a living wage throughout our supply chain.

For more details on Fashion with Integrity, our Be Transparent goal and our progress, head to our plc site.

Our Fashion with Integrity related codes, policies and statement can be found here. These include our Child Labour Remediation and Young Worker Policy, Cotton Sourcing Policy, Global Framework Agreement with IndustriALL, Migrant Workers Policy, Freedom of Association and Collective Bargaining Policy and our Code of Conduct.

Figure 4: Our Tiers



Activity highlights and key results

We have continued to make progress on a range of topics which will be set out in detail in our forthcoming statement in August 2022. The following is a high-level summary of key activity carried out in the reporting period.

Mauritius

In October 2021, ASOS committed to provide financial support for Anti-Slavery International to continue supporting the MRC in Mauritius. The centre was set up in 2019 in partnership with Anti-Slavery International and local trade union Confederation des Travailleurs des Secteurs Publique et Privé (CTSP), affiliated to IndustriALL Global Union. The investment contributes to the running of the centre and supports Anti-Slavery International in continuing to provide technical advice, monitoring and learning support to the MRC's staff. In February 2022, the centre was formally opened, with ASOS, Anti-Slavery International and CTSP joined by local and international stakeholders, including migrant workers, to celebrate the progress the MRC has made.

Read more about ASOS' continued support for the Migrant Resource Centre.

Read more about the formal opening of the Migrant Resource Centre.

United Kingdom

Fashion-Workers Advice Bureau Leicester (FAB-L) is a community-led project in Leicester, United Kingdom that was set up in 2021 and launched in January 2022. It brings together garment worker communities, garment brands, and trade unions to work together to provide advice, support, and advocacy for garment workers across Leicester.

ASOS sits on the steering committee of FAB-L and works closely with the team and partners to advise on how to develop remediation strategies. ASOS has also introduced the FAB-L team to its supply chain and encouraged factories to put up posters and signpost workers if they need assistance or help.

The creation of FAB-L was the first action of the Apparel and General Merchandise Public-Private Protocol (AGM PPP), a multi-stakeholder forum in the UK designed to drive positive changes for the garment industry.

Through the AGM PPP, ASOS has also been working with trade unions to implement a Workplace Support Agreement (WSA) in its supply chain. A WSA provides garment workers access to trade unions regardless of whether they have a membership.

Read more about Fashion-Workers Advice Bureau Leicester.
Read more about the AGM PPP and Workplace Support
Agreements.

Ukraine

We are working with our partners to closely monitor and take a proactive response to prevent risks of refugee exploitation related to the war in Ukraine. As part of this, we have sent a statement to our European suppliers regarding our expectations on the employment of refugees in our supply chain and have shared guidance to respond to the risk of exploitation of this group. We are also working to map stakeholders on the ground who can support us in monitoring working conditions while we can't audit, such as trade unions and NGOs and continue to engage with the wider industry on this issue.

Partnership with Anti-Slavery International

Anti-Slavery International has acted as ASOS' 'critical friend' since 2017, providing advice, guidance and critique on ethical trade and tackling modern slavery. In January 2022, ASOS and

Anti-Slavery International signed a new partnership to 2025 to support ASOS in achieving its Fashion with Integrity goals. Each year, work through the partnership will focus on one or more of Anti-Slavery International's key strategic themes on responsible business, ending child slavery, migration and trafficking, and modern slavery and climate change. Anti-Slavery International is providing support to develop new solutions to address these challenges within ASOS' supply chain. Our partnership will also support Anti-Slavery International's advocacy and campaigning, to try to bring about stronger legal frameworks to address the global systems that enable forced labour in supply chains.

As part of our work with Anti-Slavery International, in January 2022, we formed an internal Modern Slavery Working Group (MSWG) within ASOS, featuring key internal stakeholders from different areas of the business, including Ethical Trade, Sustainability, Procurement, People Experience, Sourcing, Supply Chain, Security and Legal. The MSWG will be charged with moving our modern slavery agenda forward across the business.

One of the key workstreams of our partnership is focussed on our non-stock supply chain, with Anti-Slavery International helping to scope and co-develop an ethical trade strategy for this area of our business.

Read about our new partnership with Anti-Slavery International.

Training our people

We continue to provide training to all ASOS employees on modern slavery risks and possible indicators of modern slavery through an e-learning module. We are in the process of reviewing and updating this training and will provide more detail later in the year.

In 2022, in conjunction with Anti-Slavery International CTSP and Fifty Eight, we launched an app for migrant workers in Mauritius. Through this, workers in Mauritius can access information on their rights and responsibilities at work, as well as access an independent grievance mechanism where they can file complaints. We'll soon be conducting in-factory training for workers in our Mauritian supply chain on how to use the app confidently and effectively.

Progress reporting

We are working with Anti-Slavery International to develop impact indicators against our modern slavery strategy, to communicate our progress in addressing modern slavery risks in future modern slavery reporting.

Conclusion

We will continue to assess, develop and extend our approach to modern slavery between now and the end of the financial year, and will continue to work with our partners and other brands to reduce risks of modern slavery wherever they occur. We will provide a full update on our progress between May 2021 – Aug 2022 in August 2022.

ASOS' Interim Modern Slavery Statement was signed off by:

Simon Platts

Commercial ESG & Sustainability Director, on 17th June 2022