

# ASOS Third-Party Brands Ethical Policy

## 1. INTRODUCTION

This ASOS Third-Party Brands Ethical Policy (the “Policy”) applies to all third-party branded suppliers of ASOS, including agents and licensees (“Brand(s)”).

This Policy sets out the standards and responsibilities that Brands are required to follow and implement throughout their supply chain and the minimum standards that their products supplied to ASOS must meet.

If ASOS becomes aware of a breach or alleged breach of this Policy, ASOS shall, in addition to any remedies available to it including those set out in the Supplier Agreement, be entitled to terminate the Supplier Agreement in accordance with Clause 35.

ASOS reserves the right to conduct an audit or inspection of any premises used in the manufacture of products sold by the Brand to ASOS, including premises used by the Brand itself or any other third parties within the Brand’s supply chain, if ASOS reasonably suspects or becomes aware of a breach or alleged breach of this Policy. The Brand shall provide and shall procure that any applicable third parties shall provide such information and access to premises and individuals as may be reasonably required to investigate such breach and/or alleged breach.

Brands shall attend and participate in good faith in all review meetings reasonably requested by ASOS, including where such meeting is requested as the result of any audit or inspection, or breach of the Supplier Agreement and/or this Policy. Brands shall take such action and make such changes as may be reasonably required by ASOS in order to remedy any breach of this Policy and/or the Supplier Agreement.

## 2. THIRD-PARTY BRANDS CODE OF CONDUCT

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

It is ASOS’ responsibility to ensure that the human rights of every worker in its supply chain is respected and protected and that every worker in its supply chain feels safe at work and financially secure. This responsibility extends to Brands, who are responsible for ensuring that the human rights of every workers in their supply chain are respected and protected.

To achieve this, ASOS expects its Brands to:

- engage with the communities in which they operate, and with their business partners throughout their supply chain;
- have visibility of their supply chain with a view to provide transparency to customers including ASOS;
- monitor their supply chain and implement policies and procedures; and
- address human rights impacts and remediate, when necessary.

All Brands are required to comply with this Policy throughout their supply chain, including within sub-contracted production facilities. If a difference arises between standards within this Policy and relevant local legislation, the highest standard shall apply.

- **No forced labour, human trafficking and slavery**  
ASOS condemns and prohibits all forms of modern slavery. Brands must ensure that no forced labour, including prison labour, indentured labour, bonded labour or other forms of forced labour is used in their supply chain at any time. This includes making sure Brands and those in their supply chain do not

withhold the citizenship documents of their workers and are responsible for employment eligibility fees of all workers, including recruitment fees.

- **No connection to the Xinjiang Uyghur Autonomous Region (XUAR) or suspected forced labour either directly or indirectly**

Brands must ensure that no products sold or offered for sale to ASOS are linked in any way to the XUAR or to any forced labour, and that all products shown to ASOS buyers can be verified as having no connection to the XUAR. This includes indirect connections such as partnership, group company links, or investment activities that are connected to the XUAR region or to Government-supplied labour in China.

Brands must immediately notify ASOS at [ethicaltrade@asos.com](mailto:ethicaltrade@asos.com) should they become aware of any direct or indirect links or suspected links, to the XUAR or any forced labour, so appropriate next steps can be taken by ASOS and/or the Brands.

Brands must promptly provide all documentation required by ASOS and the applicable customs authority to release any products detained by such customs authority due to their link or suspected link to XUAR.

- **No child labour**

ASOS condemns and prohibits child labour. Brands must ensure that no workers under the age of 15, or the local legal minimum age, or the age for completing compulsory education, whichever of the three is higher, are employed in their supply chain.

- **Freedom of association and collective bargaining**

ASOS recognises that both a worker's right to organise and bargain collectively are the foundations for the realisation of other labour rights. Brands must ensure that their suppliers do not prevent or discriminate against workers who wish to associate or bargain collectively.

Where the right to freedom of association and collective bargaining is restricted under law, Brands must ensure suppliers allow for the development of parallel means for independent and free association and bargaining.

- **No discrimination**

Brands must ensure that discrimination against any supply chain workers is prevented, including hiring, compensation, promotion or discipline. Supply chain workers must be treated with respect and equality regardless of gender, race, religion, caste, age, disability, sexual orientation, pregnancy, marital status, nationality, political opinion, trade union affiliation, social or ethnic origin. Women and men shall receive equal pay for work of equal value.

- **No harassment or abuse**

ASOS does not tolerate harassment, physical, sexual, psychological or verbal abuse, or corporal punishment perpetrated against supply chain workers. Brands must ensure that no harassment or abuse is perpetrated in their supply chain and workers are treated with respect and dignity.

- **Wages and benefits**

All women and men have the right to be compensated for a regular work week that is sufficient to meet employees' basic needs and provide some discretionary income. Brands must ensure that their suppliers or any other third parties within the Brands' supply chain, are paying at least the legal minimum wage on a timely manner, and all the legally mandated benefits including holidays and leaves, and statutory severance when employment ends. Disciplinary deductions from pay must not be tolerated.

- **No excessive working hours**  
Brands must ensure that workers throughout their supply chain are not obliged to work in excess of the regular workweek and maximum overtime set by local law. A regular workweek shall not exceed 48 hours and one day off shall be guaranteed for every seven-day period. Other than in exceptional circumstances, the sum of regular and overtime hours in a week shall not exceed 60 hours. Overtime shall be voluntary, compensated at a premium rate and not be requested on a regular basis.
- **Regular employment relationship**  
Brands must ensure that their suppliers adopt and adhere to rules and conditions of employment that respect workers, and, at a minimum, safeguard their rights under national and international labour and social security laws and regulations. Homeworkers must be compensated and treated accordingly with the Third-Party Brands Code of Conduct.
- **Safe working environment**  
Brands must ensure that their suppliers provide a safe and hygienic working environment for all employees. There must be systems in place to detect, avoid and respond to potential risks to the safety of all employees. All possible precautions must be taken to prevent accidents at the workplace. Brands must ensure that their suppliers and their sub-contractors' manufacturing and storing buildings are safe, fire and emergency action plans are in place. All safety measures must also be in place at dorms, canteens, and childcare facilities. All workers have the right to refuse unsafe working conditions.
- **Business ethics**  
ASOS recognises the importance of the Bribery Act 2010 (and applicable local equivalents) in combatting global corruption and fosters a culture across its operations to resist and eliminate corruption in all its forms. Brands must not seek an improper advantage, including through the payment of bribes, to secure business with ASOS, or to influence the outcome of an independent audit or review. Brands must ensure corruption and/or bribery do not occur throughout their supply chain.

### 3. THIRD-PARTY BRANDS MINIMUM REQUIREMENTS

As part of its approach to responsible sourcing and ethical trade, ASOS has some minimum requirements that Brands must meet.

ASOS's minimum requirements aim to establish a common baseline across its Brands and are basic practices which ASOS believes any responsible business must implement.

- **Supply chain transparency**  
Brands must have visibility of where their products are made and maintain a complete set of records, including name and addresses of all manufacturing sites integral to the production of their products (i.e. Tier 1 suppliers). If requested by ASOS, Brands must promptly provide full and accurate information regarding their Tier 1 suppliers and any records / documentation which may be requested by ASOS from time to time including any records or documentation that may be required to verify compliance with this Policy. If ASOS believes that a Brand has attempted to withhold or falsify information requested by an ASOS representative, this shall be considered a breach of this Policy and the provisions set out in Section 1 of this Policy shall apply.
- **Supplier ethical code of conduct**  
In addition to complying with this Policy, Brands must have their own supplier ethical code of conduct (or equivalent) which covers the basic fundamental human and labour rights of the people in their supply chains and which must mirror the obligations in this Policy. The supplier ethical code of conduct must cover the Ethical Trade Initiative (ETI) base code (including any updates made from time to time)

and be appropriately enforced in their supply chains. The policy must be approved by the ASOS Branded Engagement team.

- **Compliance with human rights due diligence legislations**

Brands must comply with human rights due diligence laws applicable to their business.

If a Brand operates in the UK and the requirements under the Modern Slavery Act 2015 apply to its business, Brands must produce a modern slavery statement ("**Statement**") in accordance with Government guidance.

- **Compliance with chemical regulations**

Brands must ensure that all products supplied to ASOS comply with relevant chemical regulations requirements outlined in ASOS Chemical Policy, Restricted Substance List ("**CPRSL**"). Additionally, Brands shall ensure that their fabric mills, wet processors, and component suppliers also comply with relevant chemical regulations requirements in the CPRSL.

- **Animal-derived materials policy**

In addition to complying with the ASOS Animal Derived Materials Policy, if Brands use animal-derived materials in their products, they must have their own animal-derived materials policy that protects the Five Freedoms for Animal Welfare (as included in the Animal Welfare Act 2007) and which is enforced within their supply chain.

- **UK Manufacturing standards**

Brands manufacturing clothing products (including clothing accessories such as hats, scarves, gloves, belts, etc.) ("**Clothing Products**") in the United Kingdom must commit to sign the Transparency Pledge and disclose their full supplier list (UK & rest of the world) on their website and/or on the Open Apparel Registry in line with the Transparency Pledge requirements. Brands must ensure this information is updated at least once a year.

Brands manufacturing Clothing Products in the United Kingdom must align with ASOS UK production standards by joining the Fast Forward programme and must ensure that all of their UK suppliers and/or any UK entity in its supply chain who manufactures Clothing Products sold to ASOS, are audited according to the Fast Forward methodology. Brands must provide full and accurate information to Fast Forward of all their UK suppliers and/or any UK entity in its supply chain who manufactures Clothing Products sold to ASOS. Attempts to withhold or falsify information provided to Fast Forward shall be considered a breach of this Policy and the provisions set out in Section 1 of this Policy shall apply.