



Version: 1.0

This document provides a high-level summary of our Supplier and Business Partner Codes of Conduct. For full detail on our policies & your responsibilities please refer to the full Code relevant to your business with ASOS.

Effective from July 2025

asos

Code of Conduct Summary

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At ASOS, we are committed to building and maintaining strong, ethical, and sustainable partnerships. We value human and labour rights, ethical standards, compliance with the law, diversity and inclusion, and environmental sustainability. Integrity, respect, and transparency are the foundation of our business culture.

Our Approach

We hold ourselves and our partners accountable to these standards and expect our Suppliers and Business Partners to conduct themselves in line with ASOS's Code of Conduct. Our Code of Conduct applies to all 'Suppliers' and 'Business Partners' of ASOS. This document provides a high-level summary of our Code of Conduct and outlines our minimum requirements. We expect all Suppliers and Business Partners to integrate these standards throughout their own value chains and to observe best-practice minimums for all individuals involved.

See the full Code of Conduct & Policy Documents here:

Code of Conduct
& Policies for Suppliers

Code of Conduct
for Business Partners

Applying the Code of Conduct

Key Definitions and Scope

In this document:

- **'Supplier'** refers to manufacturers of ASOS private label products.
- **'Business Partner'** includes, but is not exclusive to, Wholesale, marketplace, Partner fulfil, ASOS fulfilment services (AFS), agents and licensees ("Partner Brand(s)"), and Goods not for resale partnerships (GNFR).
- **'Worker'** means any individual whom the Suppliers and/or Business Partners employs, hires or engages, or otherwise uses to conduct its business.
- **'Representative'** means the Suppliers and/or Business Partners suppliers, vendors, agents, and subcontractors who form part of ASOS's supply chain.

Supplier and Business Partner's Commitment

The Supplier and/or Business Partner agrees that:

- It will comply with the requirements in ASOS's Code.
- It has appropriate systems in place to ensure continuous compliance and to demonstrate such compliance.
- Any breach of the Code will allow ASOS to terminate its relationship with the Supplier and/or Business Partner with immediate effect.





“We reserve the right to conduct audits, co-define risk mitigation plans, and terminate relationships with Suppliers and Business Partners that do not comply with the requirements outlined.”

Our Expectations

ASOS expects Suppliers and Business Partners to comply with the principles outlined in the Code of Conduct and to strive for continuous improvement beyond regulatory obligations. The obligations are based on international standards, including ILO Conventions and the Universal Declaration of Human Rights (UDHR).

Consequences in Case of Violations

ASOS will not tolerate any violations of human and labour rights, breaches of law, or other violations of the Code of Conduct. We reserve the right to conduct audits, co-define risk mitigation plans, and terminate relationships with Suppliers and Business Partners that do not comply with the requirements outlined.

1.0

Planet

Environmental Data Gathering

Suppliers and Business Partners must collect and report environmental data annually. This practice supports ASOS’s sustainability targets and enhances environmental standards by tracking progress, identifying areas for improvement, and ensuring transparency in environmental performance.

Environmental Management Systems

Suppliers and Business Partners are required to implement an effective Environmental Management System (EMS) with measurable targets for continuous improvement. An EMS helps systematically manage environmental responsibilities, ensuring compliance with regulations, identifying and mitigating risks, and driving ongoing enhancements in environmental performance.

Greenhouse Gas Emissions and Energy Use

To combat climate change, Suppliers and Business Partners must track energy sources, set baselines for energy use, and implement plans to reduce greenhouse gas emissions. Renewable energy should be adopted in order to minimise the carbon footprint and promote sustainable energy practices.

Waste Management

Proper waste management is crucial for minimising environmental pollution and conserving natural resources. Suppliers and Business Partners must prioritise waste reduction, reuse, and recycling, ensuring compliance with local waste management regulations. Open burning or dumping of waste is strictly prohibited to prevent environmental harm.

Water Use

Responsible water use is essential for sustainable operations, particularly in regions of high water stress. Suppliers and Business Partners must track water sources, conduct water balance analyses, and implement water efficiency measures. These actions help conserve water resources and ensure the availability of water for communities and ecosystems. efforts help improve air quality and ensure compliance with environmental regulations.

“Renewable energy should be adopted as it helps minimise the carbon footprint and promotes sustainable energy practices”





Wastewater Discharge

Suppliers and Business Partners must treat all wastewater responsibly and comply with relevant wastewater guidelines. Discharge of untreated waste water to land or surface water is prohibited to prevent environmental contamination and protect ecosystems. Proper treatment and discharge practices ensure that wastewater is managed responsibly, minimising its environmental impact.

Air Pollution

Managing air emissions is crucial for protecting public health and the environment. Suppliers and Business Partners must identify and manage air emissions, create an inventory of emissions, and implement plans to minimise and reduce emissions. These efforts help improve air quality and ensure compliance with environmental regulations.

Environmental Monitoring

ASOS reserves the right to audit environmental plans and records to ensure compliance with environmental standards. Suppliers and Business Partners must maintain complete records and provide information as requested. Regular environmental monitoring helps identify areas for improvement and supports ASOS’s commitment to environmental sustainability.

For more detail on specific environmental requirements for Suppliers and Business Partners, see the full Code of Conduct & Policy Documents here:

Code of Conduct
& Policies for Suppliers
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2.0

Product

Supply Chain Transparency

Suppliers and Business Partners must maintain visibility of their supply chains. This involves providing accurate information on manufacturing sites and complying with traceability requirements. Ensuring supply chain transparency is crucial for managing risks, undertaking due diligence assessments, and complying with regulations. It helps ASOS maintain ethical practices and accountability throughout the supply chain.

Sustainable Materials

Suppliers and Business Partners must use more sustainable materials, such as recycled polyester and certified man-made cellulosic fibers. They must obtain necessary certifications and engage in sustainable sourcing practices. Using sustainable materials reduces environmental impact and promotes responsible sourcing. It aligns with ASOS's commitment to increasing the use of sustainable materials year-on-year, ensuring accountability and supporting market uncertainties.

Animal Welfare

Suppliers and Business Partners must adhere to ASOS’s Animal Derived Materials requirements, ensuring animal-derived materials are sourced ethically and comply with the Five Freedoms for Animal Welfare. Prohibited materials include fur, silk, and angora. Ethical treatment of animals is a key concern for ASOS, and this requirement ensures that animal-derived materials are sourced responsibly, promoting animal welfare and compliance with industry best practices.

Chemical Management

Suppliers and Business Partners must ensure all products and packaging meet the limits set out in ASOS’s Restricted Substance List (RSL) and comply with ZDHC guidelines. They must communicate these requirements upstream to material, component, and chemical suppliers. Proper chemical management protects worker and consumer health and minimises environmental impact. It ensures that products meet safety

regulations and industry standards, supporting ASOS’s commitment to safer, sustainable chemistry inputs and processes.

Metal Contamination

Suppliers and Business Partners must prevent metal contamination in products and cover the cost of inspection and handling of contaminated stock if required. Preventing metal contamination ensures product safety and protects consumers. This requirement emphasises the importance of managing and detecting metal contamination, ensuring that products are safe for handling and wearing.

Rejected Stock

Suppliers and Business Partners must collect rejected stock within 28 days of notification and cover the cost of logistics and associated costs. Proper handling of rejected stock ensures that non-compliant products are managed responsibly. This requirement outlines

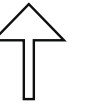
the process for collecting and managing rejected stock, ensuring accountability and compliance with ASOS’s standards.

“Proper chemical management protects worker and consumer health and minimises environmental impact.”

For more detail on specific product requirements for Suppliers and Business Partners, see the full Code of Conduct & Policy Documents here:

Code of Conduct
& Policies for Suppliers
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3.0 People

Modern Slavery and Human Trafficking

Modern slavery is a violation of fundamental human rights and involves the exploitation of workers for personal or commercial gains. It can include forced labour, bonded labour, human trafficking, child slavery, and servitude. Suppliers must ensure:

Freedom Of Employment - All workers have the right to enter and leave employment voluntarily, without any physical or monetary threats or barriers. Workers must not be subjected to any form of coercion or forced to remain in their jobs against their will.

Freedom Of Movement - Ensure workers are not coerced or physically confined to the workplace or provided accommodation. Workers must have the freedom to move and leave their place of work or accommodation without restrictions. This includes ensuring workers always retain control of their personal identification documents.

Child Labour

Suppliers may not employ anyone below 15 years of age, or the local legal minimum age, or the age for completing compulsory education, whichever of the three is higher.

Apprenticeships

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

Young Workers

Adequate safeguarding procedures must be in place to protect young workers who are under the age of 18. This is to ensure they are working in a safe environment and do not perform any hazardous work.

Remediation

Should a case of child labour be found; the supplier must take responsibility in remediation of the adverse impacts to ensure the well-being of the minor.

Freedom Of Association and Collective Bargaining

We recognise that a worker's right to organise and engage in collective bargaining is essential for safeguarding their labour rights. Suppliers must ensure that workers have the right to join unions and participate in collective bargaining.

Suppliers must not hinder or discriminate against workers who wish to associate or bargain collectively and should adopt a supportive approach towards union activities.





Discrimination, Harassment and Abuse

Suppliers must not discriminate against any workers including areas such as hiring, compensation, promotion, or disciplinary processes. All 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, or social or ethnic origin.

All workers must receive equal pay for work of equal value. Suppliers are expected to foster an inclusive workplace by actively addressing gender-based discrimination and promoting gender equality.

Harassment and abuse, whether physical, sexual, psychological, or verbal, and the use of corporal punishment are strictly prohibited within our supply chain. Suppliers must ensure all workers are treated with dignity, respect, and fairness at all times.

Wages and Benefits

All workers have the right to receive fair compensation for their work, including, at least, the legal minimum wage which is to be paid in a timely manner. This is to include all legally mandated benefits such as holidays, leave entitlements, and statutory severance upon termination of employment.

Unauthorised wage deductions such as those for PPE or used as a form of discipline are strictly prohibited. ASOS prioritises suppliers who go beyond legal minimums by providing enhanced wages and benefits, whether through individual arrangements or collective labour agreements.



“ASOS prioritises suppliers who go beyond legal minimums by providing enhanced wages and benefits, whether through individual arrangements or collective labour agreements.”

Working Hours

Working hours must comply with national laws and collective agreements, and should not exceed 48 hours per week, excluding overtime. Workers must receive at least one day off in every seven-day period, or two days off in every 14-day period where permitted by law.

Total working hours, including overtime, must not exceed 60 hours per week, except in exceptional circumstances where legally allowed or mutually agreed through a workers' organisation. Overtime must always be voluntary, compensated at a premium rate, and not regularly required.

Regular Employment

Suppliers must implement employment terms and conditions that respect workers and, at a minimum, uphold their rights in accordance with national and international labour and social security laws.

Legal obligations must not be circumvented through practices such as labour-only contracting, misuse of apprenticeship schemes, home-working arrangements, or the excessive use of fixed-term contracts.

Safe-Working Environment

Suppliers must provide a safe and hygienic working environment for their workers. Reasonable measures must be taken to prevent the workplace accidents and health hazards associated with the specific industry-related risks.

Regular, documented health and safety training must be provided to all workers and repeated for new or reassigned staff.

Workers must have access to clean toilet facilities, potable water, and, where applicable, sanitary food storage areas.

Any accommodation provided must be clean, safe, and meet basic living standards.

A senior management representative must be appointed to oversee and ensure compliance with health and safety responsibilities.



Subcontracting and Transparency

Sub-contracting of any part of ASOS production without the knowledge and approval of ASOS will not be tolerated and could lead to the termination of your contract and relationship with ASOS.

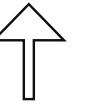
Anti-Corruption and Bribery

Suppliers must act with professionalism, fairness, and integrity in all their business relationships and operations, and comply with all applicable anti-bribery and anti-corruption laws in every jurisdiction where they operate.

For more detail on specific product requirements for Suppliers and Business Partners, see the full Code of Conduct & Policy Documents here:

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Business Ethics & Compliance

Compliance with Laws and Regulations

Suppliers and Business Partners must operate in compliance with all applicable laws and regulations relevant to their operations and the matters covered in ASOS's Code. Ensuring compliance with legal standards upholds ethical business practices and promotes accountability. It helps prevent legal issues and ensures that business operations align with regulatory requirements.

Training

Suppliers and Business Partners must implement training programs to ensure workers understand and comply with the Code. Providing training ensures that employees are aware of their responsibilities and the ethical standards they must uphold. It promotes a culture of compliance and helps prevent violations of the Code.

Anti-Bribery and Corruption

Suppliers and Business Partners must comply with all applicable anti-bribery and corruption laws and establish mechanisms to detect and prevent bribery and corruption within their operations. Preventing bribery and corruption upholds ethical business practices and promotes transparency. It helps maintain trust and integrity in business relationships.

Anti-Money Laundering

Suppliers and Business Partners must adhere to all relevant anti-money laundering and counter-terrorist financing laws and implement comprehensive systems to manage related risks. Preventing money laundering and terrorist financing protects the integrity of financial systems and ensures compliance with legal standards. It helps mitigate risks associated with illicit financial activities.

Sanctions

Suppliers and Business Partners must fully comply with all applicable Sanctions laws and regulations in the United Kingdom and other jurisdictions where they operate. This includes adherence to sanctions imposed by the United Nations, the United States, the European Union, and the United Kingdom. Suppliers must implement robust screening and monitoring processes to ensure compliance with international sanctions regulations.

Transparency and Ethics

Suppliers and Business Partners must conduct business with integrity, honesty, and transparency. Any form of bribery, corruption, fraud, or unethical conduct is strictly prohibited. Suppliers must disclose any actual or potential conflicts of interest that may affect their business relationship with ASOS. Suppliers should actively encourage employees to report any concerns regarding wrongdoing, unethical behavior, or violations of the Code.

Fraud

Suppliers and Business Partners must comply with all relevant laws and regulations related to fraud prevention, including the Economic Crime and Corporate Transparency Act 2024. Suppliers are required to implement robust measures to prevent, detect, and respond to fraud. This includes maintaining effective internal controls, conducting regular audits, and performing risk assessments to mitigate potentially fraudulent activities.

Data Protection

Suppliers and Business Partners must comply with all relevant data protection laws, including the UK and European General Data Protection Regulation (GDPR). Suppliers must implement appropriate technical and organisational measures to protect personal data from unauthorised access, loss, or damage. Any security breaches or data incidents must be immediately reported to ASOS to dataprotection@asos.com.

Artificial Intelligence

Suppliers and Business Partners must adhere to all applicable AI laws and regulations, including the European Union AI Act. AI systems must be developed and deployed in a manner that respects ethics, privacy, security, and human rights. Suppliers must ensure that AI-driven decisions are transparent and explainable, providing clear accountability for their outputs.

Cyber Security

Suppliers and Business Partners must fully comply with all applicable cybersecurity laws, regulations, and industry standards relevant to their operations and services. Suppliers must maintain and continuously improve an incident response plan to detect, mitigate, and remediate cybersecurity incidents. Suppliers must enforce strict access controls, granting permissions on a need-to-know basis.



“AI systems must be developed and deployed in a manner that respects ethics, privacy, security, and human rights.”

For more detail on specific business ethics & compliance requirements for Suppliers and Business Partners, see the full Code of Conduct & Policy Documents here:

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Monitoring & Complaints

Certifying Compliance and Audit

Suppliers and Business Partners must provide written confirmation to ASOS within 30 days when requested. This confirmation should state that they have appropriate systems in place to monitor compliance with the Code and that they can comply with the Code for the duration of their relationship with ASOS. Additionally, suppliers must provide any third-party or self-certifications that ASOS reasonably requires to demonstrate compliance with all applicable laws, regulations, and frameworks within 30 days of a written request.

Self-Monitoring and Reporting Breaches

Suppliers and Business Partners are responsible for monitoring their compliance with the Code and must report any breaches, whether actual or suspected, to ASOS.Compliance@ASOS.com as soon as possible. Suppliers must not retaliate against or take disciplinary action against any worker who, in good faith, has reported breaches of the Code, questionable behaviour, or sought advice regarding the Code.

Breach, Remediation, and Termination

If ASOS becomes aware of a breach of the Code by the Supplier, business partner or its Workers, ASOS may choose to either immediately terminate its business relationship with the Supplier, including any contracts, or request the supplier to produce a remediation plan outlining the actions the supplier will take.

For more detail on monitoring and compliance requirements for Suppliers and Business Partners, see the full Code of Conduct & Policy Documents here:

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