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Version: 1.0

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This Code applies to all business partners of ASOS, including but not exclusive to, Wholesale, Partner Fulfills, ASOS fulfilment services (AFS) and Goods not for resale (GNFR).

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Effective from July 2025

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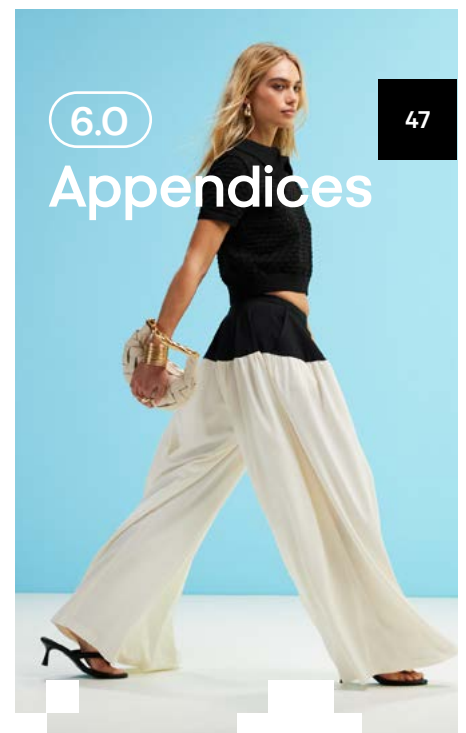
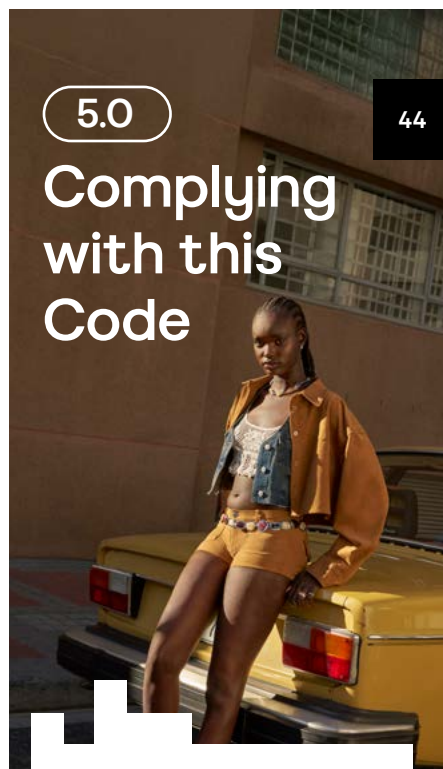
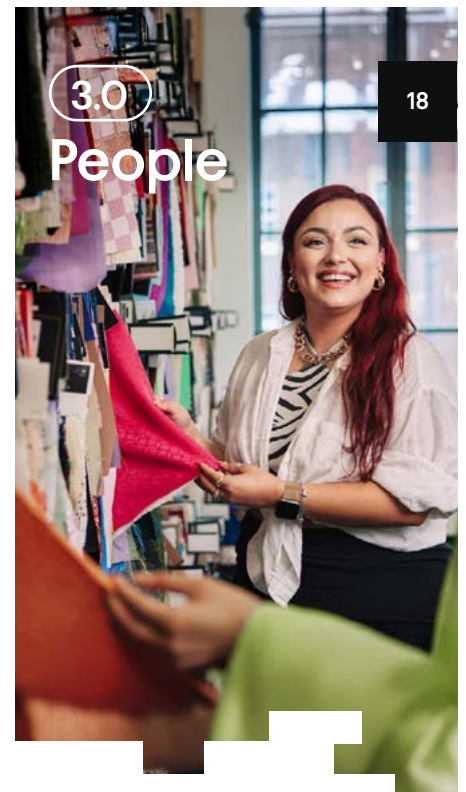
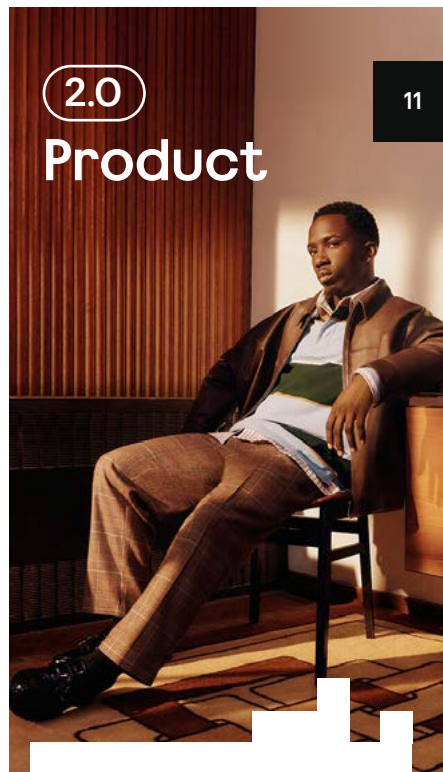
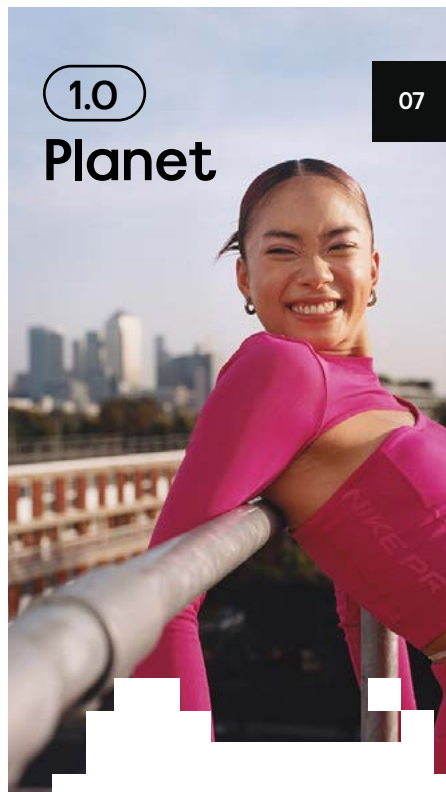
**Code of Conduct for  
Business Partners of ASOS**

# Contents



## Introduction

03







# About this code

This Code of Conduct ('Code') establishes the minimum standards and behaviours that must be met by any entity that supplies products or services to ASOS.

Corporate integrity, responsible sourcing, environmental sustainability and the safety and wellbeing of workers in the countries where we do business are of paramount importance to ASOS.

Fashion with Integrity (FWI) is our strategy for managing sustainability and corporate responsibility at ASOS. First launched in 2010, our latest evolution of FWI landed in 2024. We've updated our strategy to reflect the latest best practice, upcoming regulations, and changes to our business model and operating context. We've set a series of targets and commitments within our FWI strategy, focused on three key pillars: Planet, Product, and People.

The requirements set out in this Code are built upon the values of our FWI Strategy. All suppliers providing products and services to ASOS must conduct themselves in line with these fundamental values.

This Code applies to all Partner Brands suppliers including, but not exclusive to, Wholesale, marketplace, Partner fulfil, ASOS fulfilment services (AFS), agents and licensees ("Partner Brand(s)"), and Goods not for resale partnerships (GNFR). This code of conduct supersedes the "ASOS Third Party brand Ethical Trade policy".





# Our expectations of our business partners

We are continually working to improve our business practices and expect our partners to do the same. Business partners of ASOS should:

- Take responsibility to ensure that the manufacture of all products and provision of all goods and services is carried out in compliance with this code of conduct, which applies throughout the whole supply chain, including sub-suppliers and subcontractors.
- Ensure they have appropriate governance & management; stakeholder engagement; risk assessment and policy due diligence (including but not limited to regular independent auditing of production facilities by a recognised audit body, accessible grievance and remedy channels, escalation and remediation) and awareness raising measures in place (in line with the relevant aspects of the [ETI Base Code](#), [ILO Conventions](#), [UNGPs](#) and [MNE Guidelines](#)) and that these requirements are passed on and upheld across the supply chain.
- Be transparent and be working on improving traceability in their supply chains; and to address any non-compliances by agreeing, taking and following up on corrective actions relevant to the nature and severity of the non-compliance in a timely manner, and in line with any agreed remediation timescales.
- Notify ASOS in writing of any actual or suspected material breaches of this code of conduct within a maximum of 14 business days of becoming aware. This notification must include details of the instance, and actions proposed or taken to resolve.

ASOS reserves the right to conduct an audit or inspection of any premises used in the manufacture or provision of products, goods or services of business partners to ASOS, including premises used by the business partner itself or any other third parties within the business partners supply chain, if ASOS reasonably suspects or becomes aware of a breach or alleged breach of this code of conduct. The business partner must provide or obtain information and access to premises and individuals as may be reasonably required to investigate such breach and/or alleged breach. Business partners 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 Code.

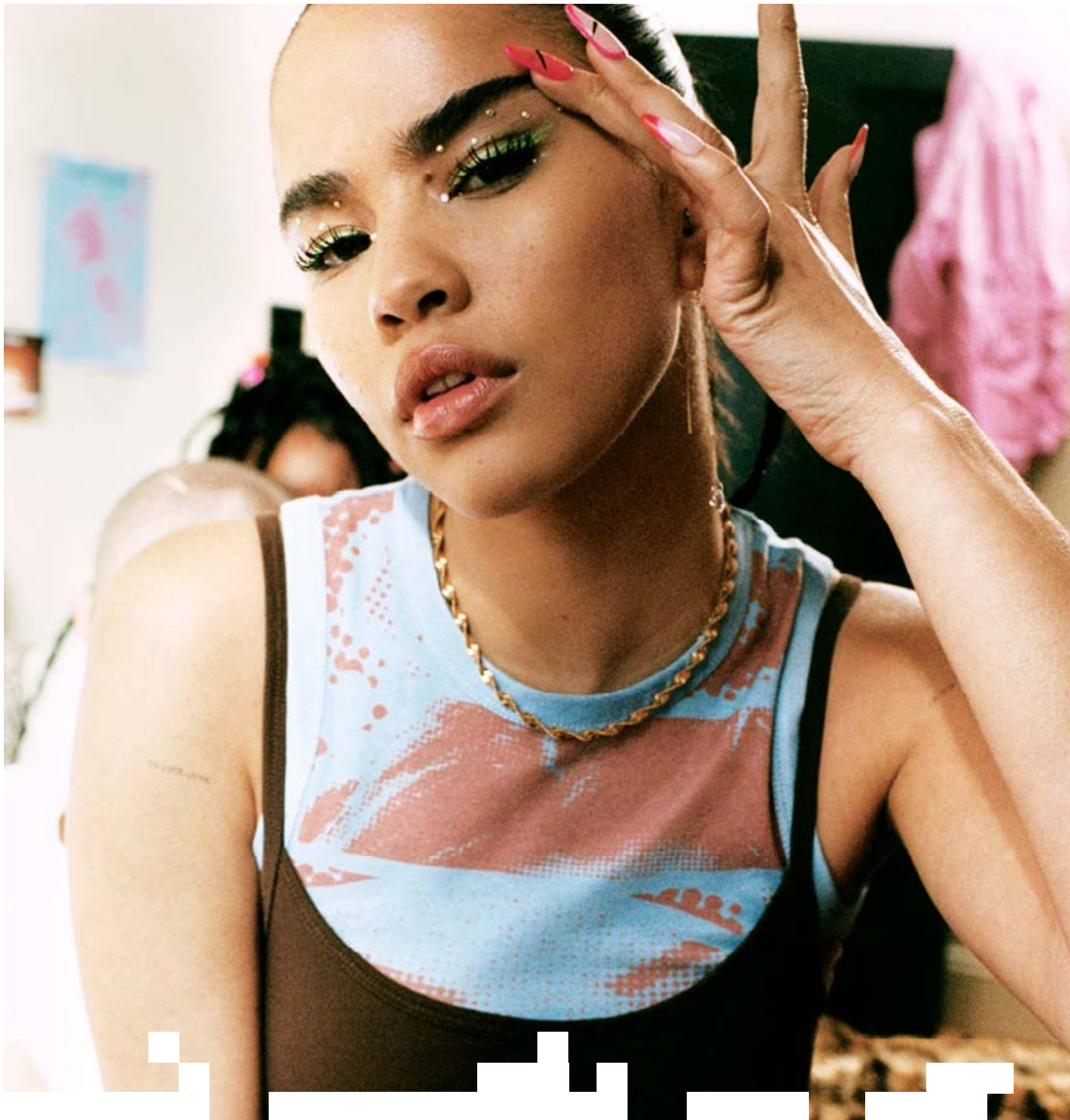
Business Partners shall take such action and make such changes as may be reasonably required by ASOS to remedy any breach of this Code and/or the Supplier Agreement. A lack of transparency, refusal to respond fully or significant delay in responding to due diligence requests, or non-resolution of critical issues, may impact your contract with us.



## Our due diligence

We aim to work with Brand Partners in a collaborative and transparent way. To gain further transparency we take certain actions and conduct our own due diligence, including requiring that suppliers agree to this code of conduct and requesting evidence to demonstrate compliance with these requirements and applicable legislation. This may include completion or disclosure of Self-Assessment Questionnaires (SAQ), requesting details and documentation of the measures in place and requesting the sharing of information using collaborative platforms such as Ecovadis, SEDEX and Worldly.

If ASOS becomes aware of a breach or alleged breach of this code of conduct, 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.





# Minimum Onboarding Requirements

ASOS has a set of minimum requirements that all brands selling, or sold, on our platform must meet. These help to ensure that our partners' approach is aligned with our own, and that we can meet legislative requirements in the territories we trade in.

Topic	Minimum requirements
Supply chain transparency	Business partners must have visibility of where their products and services are made or conducted and maintain a complete set of records, including name and addresses of all manufacturing sites and premises which are integral to the production of their products or services supplied to ASOS. (Direct suppliers as a minimum). Partners should be mapping to gain visibility throughout the supply chain. If requested by ASOS, business partners must promptly provide full and accurate information regarding the factories or premises used to for the manufacture of products or services supplied to ASOS or sold on the ASOS platform 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 Code. If ASOS believes that a business partner has attempted to withhold or falsify information requested by an ASOS representative, this shall be considered a breach of this Code and the provisions set out in Section 1 of this Code shall apply.
Due Diligence	<p>In addition to complying with this Code, ASOS business partners must have their own due diligence policy (or equivalent) which outlines the company's approach to conducting due diligence on human rights and environmental issues, including its scope, processes, and responsibilities. This policy must cover the fundamental human and labour rights of the people in their supply chain, and mirror the obligations in this Code and outline the due diligence that brands have in place to identify, prevent, mitigate and remediate the most significant risk to human rights and environmental impact in their supply chain and be appropriately enforced in their supply chains. The policy must be approved by ASOS prior to onboarding.</p> <p>If a Business partner of ASOS operates in the UK and the requirements under the Modern Slavery Act 2015 apply to its business, partners must produce a modern slavery statement ("Statement") in accordance with <a href="#">Government guidance</a>.</p>
Chemical compliance	Business partners of ASOS must ensure that all products or services supplied to ASOS directly or indirectly, comply with relevant chemical and product safety regulation requirements outlined in ASOS Chemical Policy, Restricted Substance List ("CPRSL").
Animal Welfare	In addition to complying with the ASOS Animal Welfare policy (page 13) , if business partners of ASOS use animal-derived materials in their products or services, they must have their own animal welfare policy that protects the Five Domains for Animal Welfare (as included in the Animal Welfare Act 2007) and which is enforced within their supply chain.
Legal Compliance	ASOS Business Partners and their suppliers must comply with all applicable laws and regulations regarding the protection and preservation of Human rights and the environment, including obtaining and maintaining all required permits. We also encourage our Business Partners to pursue aspirational commitments to the prevention, reduction and remediation of Human rights and environmental impacts.





1.0

# Planet

1.1 Planet.....08



# 1.1 Planet

## Context

Good environmental management is key to managing environmental risks and achieving the environmental goals that are demanded by regulators, customers and other stakeholders. ASOS is committed to preventing and minimising the impact its operations have on the environment and it is ASOS' responsibility to ensure that it is working with its business partners to also prevent, minimise and remediate risks to the environment which are caused by the production of goods or services procured by ASOS or sold on the ASOS platform.

## Definitions

Tier	Tier definition	Tier processes
Tier 1	Finished product manufacturing and shipping to ASOS	Cut make trim (CMT); garment stitching; sewing; product assembly; lasting
Tier 2	Subcontracted site for finished product manufacturing	Cut make trim (CMT); garment stitching; sewing; product assembly; lasting
Tier 3	Enhancement to product	Additions to product e.g printing (final product), embroidery, trim attachment, embossing, garment piece dyeing, laundry etc
Tier 4	Fabric and components	Fabric mills, tanneries, hardware and trims
Tier 5	Raw materials	Textile fibres, natural and manmade materials

## ASOS Business Partner Responsibilities

To achieve this, ASOS expects its Partner Brands to:

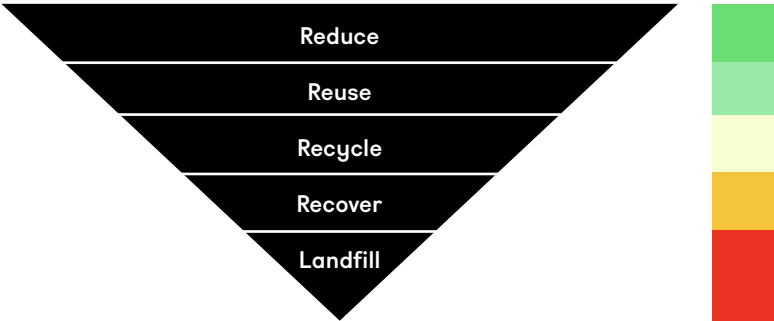
- Have visibility of their supply chain to at least tier 1 and be mapping beyond this.
- Monitor their supply chain, implementing policies and procedures, which identify, address and prevent the Environmental risks which may exist, and have plans in place to remediate these when necessary, prioritising the most significant adverse impacts.
- Seek continuous improvements in their environmental performance to reduce the impacts of their operations, ideally by using an externally accredited management process and with reference to science-based targets and industry standards.
- Be willing to provide transparency on environmental risks to stakeholders including ASOS.
- Be working on embedding the following improvements for responsible business conduct:





# 1.1 Planet continued

Topic	Guidelines
Environmental management systems	ASOS business partners should embed environmental management systems and appoint a senior team member responsible for coordinating environmental management activities. An environmental management system (EMS) helps you to identify, track and manage the environmental impact of your business over time and is essential for understanding environmental risks, achieving legal compliance and effecting improvement.
GHG Emissions/ Carbon	Partners of ASOS should seek Greenhouse gas (GHG) and Carbon emission reduction opportunities through lower impact materials, product processes and renewable energy sources. Implement a greenhouse gas reduction target and action plan consistent with a Science-based target for Climate on the 1.5C pathway, or a target approved by the SBTi.
Raw materials	Partners should minimise the use of virgin raw materials, optimising more efficient processes and the use of recycled and lower impact alternatives to fossil fuel-based and non-renewable resources where possible.
Water	Water availability is increasingly threatened by climate change, particularly in regions of high-water stress. Addressing this challenge is vital for sustainable operations and resource preservation. Business partners with suppliers in water-stressed regions should take proactive measures to mitigate risks, ensuring responsible water use while preserving community resources. Tools such as <a href="#">WWF Water Risk Filter</a> or <a href="#">WRI Aqueduct</a> can help you to identify if you or your suppliers are in a high-water stress location.
Waste management	<p>ASOS business partners should look to reduce, reuse and recycle products and materials used in their business operations as much as possible to reduce waste in their business operations. Waste shall be disposed of in an efficient, safe and environmentally responsible way and in full compliance with applicable laws.</p> <p>Business Partners should use the waste hierarchy to shape their approach to operational and to supply chain waste. At the top of the hierarchy is waste prevention and minimisation. At the bottom is disposal without any form of material or energy recovery.</p>





## 1.1 Planet continued

Topic	Guidelines
Chemical	ASOS has developed a <a href="#">Restricted Substances List (RSL)</a> , which outlines the acceptable limits of potentially toxic or harmful substances which can be present in finished products. This RSL has been developed to comply with legislative and regulatory requirements of global trading territories ASOS sells within, including REACH and Proposition 65. ASOS expects all our suppliers (including brands) to supply products that comply with applicable global legislative and regulatory requirements and take responsibility for keeping up to date with any legislative changes. Suppliers should be risk-assessing all materials and product for compliance as part of product development process.





2.0

# Product

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## 2.1 Sustainable Materials

### Context

Raw materials influence resource extraction, ability to circulate materials at their highest value, and are key to carbon reduction and reducing water impact. ASOS is committed to increasing the use of more sustainable materials year-on-year within our Own products and encourage our business partners to minimise the use of virgin raw materials, optimising more efficient processes and the use of recycled and lower impact alternatives to fossil fuel-based and non-renewable resources wherever possible.

### Definitions

- **More Sustainable Material:** A material that has a lower environmental impact on average at raw material production stage than the conventional form of that material.

### General Criteria for More Sustainable Materials:

- **More Sustainable Material:** A material that has a lower environmental impact on average at raw material production stage than the conventional form of that material.
- **Lower Environmental Impact:** The production of the raw material must have a lower environmental impact than the conventional form. This must be verified by credible, independent evidence.
- **Traceability:** The sustainable material content must be traceable up to at least the fabric level. This requires a credible physical tracer technology or a robust chain of custody system supported by third-party assurance.
- **Credibility of Standards:** The organisation owning the sustainability standard or branded sustainable material must be credible and committed to recognised good practice sustainability governance principles.
- **Industry Recognition:** The material must be widely recognised within the industry as a more sustainable material by credible sustainability organisations and other global fashion brands.





## 2.1 Sustainable Materials continued

### General Criteria for More Sustainable Materials:

Material	Guidance
Cotton	ASOS does not permit the sourcing of cotton from Xinjiang (China), Turkmenistan, or Uzbekistan or other prohibited regions. ASOS business partners must have conducted their own due diligence and be able to declare the country of origin of all raw cotton used in the manufacturing of products supplied to ASOS or sold on ASOS.com if requested. Preferably use recycled or more sustainable cotton which is certified to standards such as GRS (Global Recycled Standard) or RCS (Recycled Claim Standard), GOTS (Global Organic Textile Standard) or OCS (Organic Content Standard). Brand partners are encouraged to use Better cotton as a minimum standard.
Man-made cellulosic fibres (MMCF)	Preferably use MMCF materials that are certified and traceable, such as LENZING™ ECOVERO™, TENCEL™ Lyocell, and others listed in this Code. Be able to provide certification confirmation letters and product licenses from the respective certifying bodies if requested by ASOS.
Synthetic Fibres (Polyester, Acrylic, Nylon)	Preferably use recycled polyester, acrylic, and nylon which are certified to standards such as GRS (Global Recycled Standard) or RCS (Recycled Claim Standard). Be able to provide scope certificates at CMT/end product manufacture facility level and submit transaction certificates at purchase order level if requested.
Flax and Hemp	Preferably use more sustainable flax and hemp certified to standards such as GOTS (Global Organic Textile Standard) or OCS (Organic Content Standard). Be able to provide scope certificates at CMT/product manufacture facility level and submit transaction certificates at purchase order level if requested.
Non-Clothing Materials (Metals, Plastics, Glass)	Preferably use recycled versions of metals, plastics, and glass certified to standards such as GRS (Global Recycled Standard) or RCS (Recycled Claim Standard). Be able to provide scope certificates at CMT/product manufacture facility level and submit transaction certificates at purchase order level if requested.



## 2.2 Animal Welfare

### Context

ASOS believes it is not acceptable for animals to suffer in the name of fashion or cosmetics.

No animals should be slaughtered specifically to produce apparel, accessories, footwear and jewellery products sold through any of ASOS' websites. All animal materials used must be by-products of the meat industry.

We encourage our Face and Body partners to adopt more ethical and lower-impact alternatives to animal-derived ingredients whenever possible. Partners should be conducting thorough due diligence to map supply chains and identify, mitigate and remediate risks that may violate the five domains.

No product sold on ASOS should be tested on animals.

### Definitions

- **Animal Welfare** - the protection of the health and wellbeing of animals. Protecting an animal's welfare involves safeguarding a good quality of life throughout its entire rearing process, including during transportation to slaughter, as well as ensuring a humane death
- **By-product** - Animals should only be reared and slaughtered for the food industry.
- **Calf and Lamb Definitions:**
  - ▲ Calf: Animal under 8 months old.
  - ▲ Lamb: Animal under 2 years old.
- **Karakul lambskin fur** has several names. The fur from foetal lambs is called karakulcha, cha or broadtail. Fur from newborn lambs is known as karacul, caracul, garaqul, astrakhan, swakara, swartkoppersie krimmer, nakara, blackhead Persian or Persian pelts.
- **Mulesing** - Involves cutting away flesh from a sheep's rump, often without anesthetic, to prevent flystrike.
- **Textile Exchange Standards** - Promote good animal welfare, traceability, and responsible land management practices.
  - ▲ [Responsible Alpaca Standard.](#)
  - ▲ [Responsible Down Standard.](#)
  - ▲ [Responsible Mohair standard.](#)
  - ▲ [Responsible Wool Standard.](#)
- **Good Cashmere Standard' (GCS)** is an independent standard for cashmere, developed by the Aid by Trade Foundation (AbTF), that aims to improve the welfare of cashmere goats, the working conditions of the farmers. [Good Cashmere Standard®](#).

### ASOS Business Partner Responsibilities

#### **Animal-derived materials must:**

- Be a by-product of the meat industry: Materials must not come from animals slaughtered specifically for fashion or beauty products.



## 2.2 Animal Welfare continued

### ASOS Business Partner Responsibilities

#### ***Animal-derived materials must:***

- Be a by-product of the meat industry: Materials must not come from animals slaughtered specifically for fashion or beauty products.
- Adhere to the Five Domains: Animals must be reared, transported, and slaughtered under industry best practices ensuring:
  1. Freedom from hunger and thirst.
  2. Freedom from discomfort.
  3. Freedom from pain, injury, and disease.
  4. Freedom to express normal behaviour.
  5. Freedom from fear and distress.
- **Not** come from vulnerable, endangered, exotic, or wild-caught species.
- Undergo fibre composition or fibre identification testing to ensure prohibited materials are not used.
- Undergo due diligence checks: Both supplier and ASOS will conduct checks to ensure compliance.
- Be clearly labelled: Material type must be indicated on the product care label and what description.

#### ***Prohibited Animal Derived Materials***

The following materials must **not** be used in products sold through ASOS:

- Vulnerable and endangered species: Species listed by the International Union for the Conservation of Nature (IUCN) or the Convention on International Trade in Endangered Species (CITES).
- Fur: Including Mongolian lambs' fur and Karakul lambskin pelts from aborted or newborn lambs.
- Silk.
- Angora and other rabbit hair.
- Bone, horn, coral, pearl, shell (including mother of pearl), and teeth.



## 2.2 Animal Welfare continued

### *Permitted Animal Derived Materials*

The following materials can be used with some exceptions:

Material	Guidance
Feathers & Down, Alpaca, Mohair	<p>Must be certified to Textile Exchange standards (Responsible Alpaca Standard, Responsible Down Standard, Responsible Mohair Standard). Down feathers from swans are not allowed. Feather or down from greylag geese are banned due to the risk that they have been force-fed to produce foie gras.</p> <p>The brand must be pre-approved to sell Alpaca, Down/Feather or Mohair at ASOS.</p>
Cashmere	<p>Cashmere must be certified by The Good Cashmere Standard or Sustainable Fibre Alliance.</p> <p>Recycled cashmere can be used if certified to GRS or RCS but cannot be blended with un-certified cashmere.</p> <p>The brand must be pre-approved to sell cashmere at ASOS.</p>
Leather & Skin	<p>Only from cow, buffalo, sheep, goat, or pig, sourced as a by-product of the meat industry and from producers with good animal husbandry can be used. Must not be obtained from aborted animals, juvenile animals, animals kept in confinement systems, wild-caught animals, exotic animals, or vulnerable and endangered species. Leather or skin with hair or wool on are accepted from the above species only, including shearling/sheepskin. All leather must meet the UK/EU law38 on deforestation regulations. You must be able to provide evidence, on request, that your products are sourced from regions free from recent deforestation or any involvement in forest degradation.</p> <p>Undergo fibre identification (ISO 17131:2020) testing to identify leather and distinguish it from other materials.</p>
Wool	<p>Must be sourced from producers with good animal husbandry. Merino wool must not be sourced from farmers who practice mulesing. Encouraged to be sourced from Responsible Wool Standard certified farmers.</p>
Other Animal Hair	<p>Only from cow, buffalo, yak, horse, and goat from producers with good animal husbandry. Must not be obtained from vulnerable or endangered species or harvested by live plucking. Must not be used in makeup or shaving brushes. Synthetic alternatives must be clearly labelled as synthetic.</p>

### *Animal Testing:*

- No product sold on ASOS.com should be tested on animals.
- Brands selling cosmetic products in the EU through any of ASOS' websites must comply with the requirements of EU animal testing ban law.

### *Animal Imagery:*

- Must be sensitive to animal welfare issues.
- Prohibited animals and materials must not be used for marketing, production, or communication purposes.





## 2.2 Animal Welfare continued

*ASOS business partners are expected to:*

- Have an animal welfare policy that aligns with this code of conduct
- Request and share the species name and country of origin of the animal materials that are used in products sold to ASOS or sold on ASOS.com.
- Test materials for fibre composition and submit third-party lab test reports to ASOS if requested.
- Clearly label the type of animal-derived material on product care labels and descriptions.
- Include the term “faux” for synthetic animal materials.
- Check products to ensure compliance.
- Be aware that ASOS conducts visual product spot checks and may request third-party lab testing from our business partners.
- Discuss any concerns with ASOS Brand Engagement team.



3.0

# People

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## 3.1 General Requirements

### Context

ASOS is dedicated to upholding, safeguarding, and advocating for the human rights of all individuals impacted by our operations, including employees, supply chain workers, customers, and local communities.

We acknowledge our responsibility to ensure that the human rights of every worker within our supply chain are respected and protected. Every individual in our supply chain should experience a safe working environment, financial security, and dignity.

This responsibility extends to ASOS' business partners, who are responsible for ensuring that the human rights of all workers in their supply chain and operations are respected and protected.

### ASOS Business Partner Responsibilities

To achieve this, ASOS expects its business partners to:

- Engage with the communities in which they operate, and with their business partners throughout their supply chain.
- Have visibility of their supply chain to at least tier 1, be actively mapping beyond this and;
- Monitor their supply chain and implement policies and procedures, which identify, address and prevent human rights risks and remediate these when necessary.
- Be willing to provide transparency on supply chain and risks to stakeholders including ASOS.

All ASOS business partners are required to comply with this Code throughout their supply chain, including within sub-contracted facilities. If a difference arises between standards within this Code and relevant local legislation, the highest standard shall apply. Further details on ASOS' approach to managing Human Rights in our business can be found in the ASOS Code of Conduct for suppliers, and within our Modern Slavery statement on ASOS plc.



## 3.1 General Requirements continued

Topic	Requirements for ASOS business partners
No forced labour, human trafficking and slavery	ASOS condemns and prohibits all forms of modern slavery. ASOS business partners 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 that they and their supply chain partners 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	<p>ASOS business partners 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.</p> <p>Partners must immediately notify ASOS at <a href="mailto:branded.engagement@asos.com">branded.engagement@asos.com</a> 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.</p> <p>Partners 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.</p>
No child labour	ASOS has a zero-tolerance policy for child labour within its supply chains. Ensuring the elimination of child labour within the supply chain is of paramount importance. Child labour not only violates fundamental human rights but also hinders children's development, depriving them of education and a safe, healthy childhood. Business partners of ASOS must take proactive measures to prevent child labour by implementing rigorous age verification processes, monitoring compliance, and creating a safe working environment. It is essential to report any instances of child labour immediately and take swift action to remediate the situation. By doing so, ASOS's business partners contribute to the protection of children's rights, support their well-being, and uphold the ethical standards of the supply chain.
Freedom of association and collective bargaining	<p>ASOS recognises that both a worker's right to organise and bargain collectively are the foundations for the realisation of other labour rights. Partners must ensure that their suppliers do not prevent or discriminate against workers who wish to associate or bargain collectively.</p> <p>Where the right to freedom of association and collective bargaining is restricted under law, partners must ensure suppliers allow for the development of parallel means for independent and free association and bargaining.</p>





## 3.1 General Requirements continued

Topic	Requirements for ASOS business partners
No discrimination	Partners 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. Partners 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. Partners must ensure that their suppliers or any other third parties within the Partners' 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	Partners must ensure that workers throughout their supply chain are not obliged to work more than 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	Partners 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	Partners 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. Partners 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.



## 3.1 General Requirements continued

Topic	Requirements for ASOS business partners
Migrant workers	<p>Ensuring the ethical treatment of migrant workers is crucial for maintaining a responsible and sustainable supply chain. Migrant workers often face unique challenges, such as language barriers, lack of understanding of local employment laws, and vulnerability to exploitation. It is essential that suppliers take proactive measures to safeguard their rights and welfare. This includes providing adequate training, ensuring fair treatment, and protecting their legal rights. Business partners of ASOS must be vigilant in monitoring and inspecting work sites, reporting any instances of forced or compulsory labour, and adhering to all relevant laws and regulations. By doing so, suppliers contribute to a fair and just working environment, uphold the dignity of migrant workers, and support the overall integrity of the supply chain.</p>
Home workers	<p>Business partners of ASOS should adopt a policy of acceptance of homeworking and commitment to improving homeworkers' labour conditions in line with the ETI Base Code and the ILO Home Work Convention (1996, C177). Communicate this policy to all levels of the supply chain, including intermediaries and homeworkers. Work to identify and map where homeworking occurs in the supply chain and disclose this information. Manage and implement the standards set out in their policy for homeworkers.</p> <ul style="list-style-type: none"> <li>● Develop an action plan with ASOS to improve labour conditions for homeworkers, involving homeworkers and/or their representatives.</li> </ul>
Unapproved Subcontracting	<p>Business partners of ASOS should have an unapproved subcontracting policy which is clearly communicated to their suppliers and must maintain full visibility and oversight of every manufacturing unit involved in the production of products sold to ASOS or on ASOS.com. Partners should keep detailed records relating to all manufacturing units and ensure all products supplied to ASOS are manufactured in accordance with ASOS' required standards.</p>



## 3.2 Responsible Exit

ASOS strives for long-term relationships with our business partners and suppliers; however, there may be times when a supplier or factory exit is necessary. To prevent any adverse impacts on workers and ensure alignment with our commitments to the ACT Initiative on Living Wages, ASOS has established a responsible exit process. This process applies to our entire supply chain, whether sourcing directly with a factory or through an agent/supplier. If an exit is supplier-led, the same responsible exit process must be followed to prevent adverse impacts on factory workers. ASOS expects its business partners to take an aligned approach to responsible business conduct and responsible exit.

### Definitions

- **Responsible Exit:** The process of exiting a supplier or factory in a manner that prevents adverse impacts on workers and aligns with commitments to fair terms of payment, better planning and forecasting, and responsible exit strategies.
- **Impact Assessment:** An evaluation conducted by relevant ASOS departments to address reasons for exiting and collect necessary information about the factory and its operations.
- **Retrenchment Guidance:** Guidelines provided by the Fair Labor Association to ensure terminations of employment due to factory exit are carried out fairly and in accordance with local law.

### Responsible exit process:

#### *Prior to Exiting:*

- Conduct an internal impact assessment to address reasons for exiting and collect information, including factory details, reasons for exiting, history with the supplier, exiting order volume, and anticipated final order placement and shipment dates.
- Communicate the intention to exit to the relevant contact at the supplier/factory, providing a clear timeline for exiting.
- Engage with suppliers/factories and, where possible, trade unions regarding the impact of the withdrawal on workers and assess the exit timeline to alleviate any adverse impact.



## 3.2 Responsible Exit continued

### *During the Exit Process:*

- Provide written notice to workers of the possibility of employment termination and the reasons at the earliest opportunity.
- Consult with workers and their representatives before making a final decision to dismiss.
- Explore all possible alternatives to employment termination and ensure fair treatment of workers who are to be dismissed.
- Select workers for termination objectively and allow them time off during the notice period to apply for other jobs.
- Ensure all wages, severance pay, and other benefits are paid to workers according to local law and the Fair Labor Association's Retrenchment Guidance.
- Keep detailed records of actions taken and be able to provide copies to ASOS for verification if requested.

### *Immediately After Exiting:*

- Assess any adverse impacts on workers because of the factory exit.
- Engage in mediation and remediation processes with trade union representatives.
- Support the remediation process, including worker consultation regarding dismissals and ensuring workers are paid their dues.





4.0

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# Business Ethics and Compliance



## 4.1 Compliance with Laws and Regulations

### Context

Business partners are required to operate in compliance with all applicable laws and regulations in force from time to time, including those relating to the matters covered in this Code. This ensures that suppliers adhere to the highest standards of legal and ethical conduct.

### Supplier Responsibilities

#### *Compliance with Laws and Regulations:*

- Business partners must operate in compliance with all applicable laws and regulations relevant to their operations and the matters covered in this Code.

#### *Handling Competing Standards:*

- **Most Stringent Standard:** If there is a conflict between any applicable laws or regulations, the provisions of an agreement with ASOS, and the provisions of this Code, the Business partner must comply with the most stringent standard.
- **Agreement vs. Code:** If there is a conflict between the provisions of an agreement with ASOS and the provisions of this Code, the Business partner must meet the more stringent standard.



## 4.2 Training

### Business partner Responsibilities

The Business partner shall implement a training program for its workers to ensure they understand and comply with the requirements of this Code. The Business partner shall maintain records of all training provided and completed by its workers and shall make these records available to ASOS upon request.

## 4.3 Anti-Bribery and Corruption

### Context

Business partners must comply with all applicable Anti-Bribery and Corruption laws, including but not limited to the UK Bribery Act 2010 and the US Foreign Corrupt Practices Act (FCPA). Any breaches of such laws may result in the termination of the business relationship with ASOS.

### Definitions

- **Bribe:** Anything of value offered to influence an action or decision, including rewards, objects, or items of value offered to gain commercial, contractual, regulatory, or personal advantage.
- **Prohibition of Bribery and Corruption:** ASOS's zero-tolerance policy towards bribery and corruption, prohibiting the offering, giving, receiving, or soliciting of bribes or improper advantages in any form.
- **Gifts, Hospitality, Entertainment, Charitable Donations, and Sponsorships:** Items or services offered to ASOS employees that must be reasonable, proportionate, and for legitimate business purposes.
- **Conflicts of Interest:** Situations where personal or financial interests could potentially conflict with obligations to ASOS.
- **Reporting and Whistleblowing:** Mechanisms to detect and prevent bribery and corruption, and channels for reporting suspected violations.
- **Monitoring and Compliance:** ASOS's right to audit and assess Business partners' compliance with Anti-Bribery and Corruption legal requirements and policies.



## 4.3 Anti-Bribery and Corruption continued

### Business partner Responsibilities

#### *Compliance with Laws:*

- Business partners must comply with all applicable Anti-Bribery and Corruption laws, including the UK Bribery Act 2010 and the US Foreign Corrupt Practices Act (FCPA).
- Any breaches of such laws may result in the termination of the business relationship with ASOS.

#### *Prohibition of Bribery and Corruption:*

- Business partners must not, directly or indirectly, offer, give, receive, or solicit bribes or any improper advantages in any form.
- This includes offering or accepting payments, gifts, or hospitality to improperly influence business decisions, making facilitation payments to government officials, engaging in kickbacks or secret commissions, and using third parties to circumvent Anti-Bribery laws.

#### *Gifts, Hospitality, Entertainment, Charitable Donations, and Sponsorships:*

- Business partners must ensure that any gifts, hospitality, entertainment, charitable donations, and sponsorships offered to ASOS employees are reasonable, proportionate, and for legitimate business purposes.
- Lavish donations or excessive gifts that could be seen as attempts to influence business decisions are strictly prohibited.
- All gifts and hospitality must comply with ASOS's Gifts and Hospitality Policy, which outlines acceptable practices and reporting requirements to prevent conflicts of interest.

#### *Conflicts of Interest:*

- Business partners must disclose any situations where their personal or financial interests could potentially conflict with their obligations to ASOS.
- This includes relationships with ASOS employees, family ties, or financial investments that may influence business dealings.
- Any such conflicts should be reported to ASOS at [ASOS.Compliance@ASOS.com](mailto:ASOS.Compliance@ASOS.com).



## 4.3 Anti-Bribery and Corruption continued

### *Reporting and Whistleblowing:*

- Business partners must establish mechanisms to detect and prevent bribery and corruption within their operations.
- Any suspected violations should be reported immediately to ASOS through the confidential whistleblowing channel SPOT (<https://app.talktospot.com>).
- ASOS has a strict no-retaliation policy and will not tolerate any retaliation against individuals who report violations in good faith.

### *Monitoring and Compliance:*

- ASOS reserves the right to audit and assess Business partners' compliance with Anti-Bribery and Corruption legal requirements and policies.
- Business partners must maintain accurate records of all transactions and be prepared to provide evidence of compliance when requested.







## 4.4 Anti-Money Laundering

### Context

Business partners must adhere to all relevant Anti-Money Laundering (AML) and counter-terrorist financing laws and regulations. This includes full compliance with the Terrorism Act 2000 (UK), the Proceeds of Crime Act 2002 (UK), and any other applicable legislation in the jurisdictions in which they operate. Business partners are responsible for staying updated on changes to relevant laws and regulations and must take proactive measures to ensure ongoing compliance.

### Definitions

- **Anti-Money Laundering (AML):** Measures and regulations designed to prevent the illegal generation of income through money laundering.
- **Counter-Terrorist Financing:** Laws and regulations aimed at preventing the financing of terrorist activities.
- **Terrorism Act 2000 (UK):** Legislation that provides the legal framework for counter-terrorism measures in the UK.
- **Proceeds of Crime Act 2002 (UK):** Legislation that addresses the recovery of assets obtained through criminal activities.

### Business partner Responsibilities

#### *Compliance with Laws*

Business partners must adhere to all relevant AML and counter-terrorist financing laws and regulations. This includes full compliance with the Terrorism Act 2000 (UK), the Proceeds of Crime Act 2002 (UK), and any other applicable legislation in the jurisdictions in which they operate. Business partners are responsible for staying updated on changes to relevant laws and regulations and must take proactive measures to ensure ongoing compliance.

#### *Risk Management*

Business partners must implement comprehensive systems to identify, assess, and manage risks related to money laundering and terrorist financing. These systems must include robust internal controls, policies, and procedures designed to detect and prevent illicit financial activities. Due diligence must be conducted on all partners, Business partners, and third parties, with scrutiny applied to entities operating in high-risk countries or industries. AML policies and procedures should be regularly reviewed and updated to address emerging threats, ensuring that ASOS's supply chain remains secure and compliant with global AML standards.



## 4.4 Anti-Money Laundering continued

### ***Transaction Monitoring***

Business partners must implement robust monitoring systems capable of detecting and scrutinising complex or unusual transactions that may indicate illicit activities. All transactions must be screened against the most up-to-date global sanctions lists to prevent dealings with prohibited entities. Any suspicious activity must be promptly investigated and reported to the relevant authorities in accordance with applicable laws.

### ***Record Keeping***

Business partners are required to maintain accurate, detailed, and secure records of all AML and counter-terrorist financing activities. These records must be retained for the duration of the business relationship and for a minimum of five years thereafter. Upon request, Business partners must provide relevant authorities with access to these records to support compliance investigations and audits.

### ***Training and Awareness***

Business partners must provide regular AML and counter-terrorist financing training to employees, ensuring they understand their responsibilities and the legal requirements governing financial transactions. A strong culture of compliance and ethical behaviour must be promoted throughout the organisation to prevent financial crime.

### ***Reporting and Accountability***

Business partners must establish clear, confidential reporting channels for employees to raise concerns about potential breaches of AML policies. All reports must be taken seriously, thoroughly investigated, and addressed in a timely manner. Business partners must enforce strict accountability measures, ensuring individuals responsible for non-compliance face appropriate disciplinary actions.



## 4.5 Sanctions

### Context

Business partners must fully comply with all applicable sanctions laws and regulations in the United Kingdom and in any other jurisdictions where they operate. This includes strict adherence to sanctions imposed by the United Nations, the United States, the European Union, and the United Kingdom. Business partners are responsible for staying informed about relevant sanctions laws and ensuring their business practices align with these legal requirements.

### Definitions

- **Sanctions:** Penalties or other measures imposed by one or more countries against a targeted country, individual, or entity to achieve foreign policy and national security objectives.
- **United Nations Sanctions:** Measures imposed by the UN Security Council to maintain or restore international peace and security.
- **European Union Sanctions:** Restrictive measures adopted by the EU to promote the objectives of the Common Foreign and Security Policy.
- **United States Sanctions:** Economic and trade restrictions imposed by the US government to achieve foreign policy and national security goals.

### Business partner Responsibilities

#### *Compliance with Laws*

Business partners must fully comply with all applicable sanctions laws and regulations in the United Kingdom and in any other jurisdictions where they operate. This includes strict adherence to sanctions imposed by the United Nations, the United States, the European Union, and the United Kingdom. Business partners are responsible for staying informed about relevant sanctions laws and ensuring their business practices align with these legal requirements.

#### *Screening and Monitoring*

Business partners must implement robust screening and monitoring processes to ensure compliance with international sanctions regulations. This includes screening all business partners, Business partners, and customer transactions against official sanctions lists. These processes must be regularly reviewed and updated to reflect changes in sanctions regimes and emerging regulatory requirements. Business partners should maintain accurate records of their screening activities and be prepared to provide evidence of their compliance upon request.



## 4.5 Sanctions continued

### ***Prohibited Activities***

Business partners are strictly prohibited from conducting business with any sanctioned countries, individuals, or entities. No transactions may be undertaken with parties listed on international sanctions lists unless explicit authorization has been obtained from the relevant authorities. Engaging in such activities without the necessary approvals could result in severe legal and reputational consequences. Business partners must exercise due diligence to ensure they do not indirectly support or facilitate transactions that would violate ASOS's commitment to sanctions compliance.

### ***Reporting and Accountability***

Business partners must report any potential breaches of ASOS's sanctions policy immediately. Any concerns should be raised through established reporting channels, including direct contact with the General Counsel & Company Secretary or via the ASOS whistleblowing hotline. Prompt reporting is essential to ensure compliance and mitigate risks.

### ***Training and Awareness***

Business partners are responsible for providing regular training on sanctions compliance to their employees. It is essential that all employees understand and adhere to ASOS's sanctions policy, ensuring full compliance in all business activities. Business partners must take proactive steps to keep their employees informed about regulatory changes and best practices.

### ***Third-Party Compliance***

Business partners must ensure that any third parties they engage with comply with applicable sanctions laws and ASOS policies. This includes conducting thorough due diligence on all third-party partners before engagement and keeping ASOS informed of any changes that may impact compliance. Business partners are expected to take corrective action if any third party is found to be in breach of sanctions regulations.

### ***Record Keeping***

Business partners must maintain accurate and up-to-date records of all sanctions screening activities and related decisions. These records must be retained for the duration of the business relationship with ASOS and for a minimum of five years after its termination. Proper documentation is crucial for audit and regulatory compliance.



## 4.6 Transparency and Ethics (Conflicts of Interest and Whistleblowing)

### Context

Business partners must conduct business with integrity, honesty, and transparency. Any form of bribery, corruption, fraud, or unethical conduct is strictly prohibited. All business activities must comply with applicable laws and regulations.

### Definitions

- **Bribery:** Offering, giving, receiving, or soliciting something of value to influence a business decision.
- **Corruption:** Dishonest or fraudulent conduct by those in power, typically involving bribery.
- **Conflict of Interest:** A situation where personal, financial, or other interests could improperly influence business decisions.
- **Whistleblowing:** Reporting concerns about wrongdoing, unethical behaviour, or violations of policies in a confidential manner.

### Business partner Responsibilities

#### *Ethical Business Practices*

Business partners must conduct business with integrity, honesty, and transparency. Any form of bribery, corruption, fraud, or unethical conduct is strictly prohibited. All business activities must comply with applicable laws and regulations.

#### *Conflicts of Interest*

Business partners must disclose any actual or potential conflicts of interest that may affect their business relationship with ASOS. Any personal, financial, or other interests that could improperly influence business decisions must be reported immediately. Employees or representatives of the Business partner must not attempt to unduly influence ASOS employees through gifts, hospitality, or favours.





## 4.6 Transparency and Ethics (Conflicts of Interest and Whistleblowing) continued

### ***Reporting Concerns and Whistleblowing***

Business partners should actively encourage employees to report any concerns regarding wrongdoing, unethical behaviour, or violations of this Code. Employees of the Business partner must be made aware of how to report concerns confidentially, without fear of retaliation. A whistleblower protection policy must be in place to safeguard employees who raise concerns. No employee should face harassment, discrimination, or disciplinary action for reporting misconduct in good faith. The confidentiality of whistleblowers' identities must be maintained whenever possible. Business partners must provide clear and accessible channels for reporting concerns, such as a dedicated email address, hotline, or anonymous reporting tool. Employees should be informed of these channels and know whom to contact when raising concerns.

### ***ASOS Whistleblowing Channel SPOT***

Any suspected violations should be reported immediately to ASOS through our confidential whistleblowing channel SPOT (About Spot – Spot- <https://app.talktospot.com>). ASOS has a strict no-retaliation policy and will not tolerate any retaliation against individuals who report violations in good faith.

### ***Compliance and Monitoring***

ASOS reserves the right to assess and monitor compliance with this Code. Business partners must cooperate fully with any audits or investigations relating to ethical conduct and compliance with ASOS standards.

### ***Training and Awareness***

Business partners must provide regular training to their employees on whistleblowing policies and procedures. A culture of openness and accountability should be actively promoted, ensuring that employees understand their rights and obligations when reporting concerns.

### ***Documentation and Record Keeping***

Accurate records must be maintained for all reported concerns and their outcomes. These records should be used to assess the effectiveness of the whistleblowing policy and to improve compliance measures.



## 4.7 Fraud

### Context

Business partners must comply with all relevant laws and regulations, including those related to fraud prevention. This includes adherence to the Economic Crime and Corporate Transparency Act 2024, ensuring all business practices align with legal requirements.

### Definitions

- **Fraud Prevention:** Measures and controls implemented to detect, prevent, and respond to fraudulent activities.
- **Economic Crime and Corporate Transparency Act 2024:** Legislation aimed at enhancing corporate transparency and combating economic crime.
- **Internal Controls:** Processes and procedures designed to ensure the integrity of financial and accounting information, promote accountability, and prevent fraud.

### Business partner Responsibilities

#### *Compliance with Laws*

Business partners must comply with all relevant laws and regulations, including those related to fraud prevention. This includes adherence to the Economic Crime and Corporate Transparency Act 2024, ensuring all business practices align with legal requirements.

#### *Fraud Prevention*

Business partners 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. Any suspicious activity must be promptly investigated and reported in accordance with applicable laws and contractual obligations.

#### *Ethical Conduct*

ASOS expects Business partners to always conduct business ethically and with integrity. Business partners must refrain from any actions that could be perceived as fraudulent, dishonest, or misleading. Business dealings should reflect fairness, honesty, and accountability in every aspect of operations.



## 4.7 Fraud continued

### ***Transparency***

Business partners must maintain accurate and transparent financial records, ensuring that all transactions are properly recorded and reported. Misrepresentation, falsification, or omission of financial data is strictly prohibited. Clear and truthful reporting must be upheld in all dealings with ASOS and relevant authorities.

### ***Training and Awareness***

Business partners must provide regular training to their employees on fraud prevention, detection, and ethical business conduct. It is crucial to promote awareness of fraud risks and implement proactive strategies to mitigate potential threats. Business partners must ensure that their workforce understands their responsibilities in upholding ethical standards.

### ***Third-Party Management***

Business partners must ensure that all third-party partners, including subcontractors and agents, comply with ASOS's Anti-Fraud policies and ethical standards. Conducting thorough due diligence on third parties is essential to verifying their integrity and commitment to ethical business practices. Business partners remain accountable for the actions of their third-party partners and must implement safeguards to prevent fraudulent activities within their supply chain.



## 4.8 Data Protection

### Context

Business partners are required to comply with all relevant data protection laws, including the UK and European General Data Protection Regulation (GDPR) and any applicable local regulations. This includes ensuring the lawful processing of personal data in accordance with legal requirements and industry best practices.

### Definitions

- **General Data Protection Regulation (GDPR):** A regulation in EU law on data protection and privacy for all individuals within the European Union and the European Economic Area.
- **Data Security:** Measures taken to protect personal data from unauthorised access, loss, or damage.
- **Data Minimisation:** The principle of collecting and processing only the personal data that is strictly necessary for the specified business purposes.

### Business partner Responsibilities

#### *Compliance with Laws*

Business partners are required to comply with all relevant data protection laws, including the UK and European General Data Protection Regulation (GDPR) and any applicable local regulations. This includes ensuring the lawful processing of personal data in accordance with legal requirements and industry best practices.

#### *Data Security*

Business partners must implement appropriate technical and organisational measures to protect personal data from unauthorised access, loss, or damage. Regular security assessments and updates should be conducted to mitigate risks and safeguard sensitive information. Any security breaches or data incidents must be immediately reported to ASOS and no later than 24 hours of the breach to [dataprotection@asos.com](mailto:dataprotection@asos.com), along with remediation plans to address vulnerabilities.

#### *Data Minimisation*

Business partners should only collect and process personal data that is strictly necessary for the specified business purposes. Excessive or irrelevant data collection must be avoided to ensure compliance with data protection principles and to minimise risks associated with unnecessary data retention.



## 4.8 Data Protection continued

### ***Transparency***

Business partners must provide clear and transparent information regarding the collection, use, and sharing of personal data. Privacy notices should be easily accessible, written in plain language, and structured to ensure full compliance with transparency requirements. ASOS expects Business partners to uphold these principles by maintaining open communication and ensuring that individuals understand how their data is handled.

### ***Individual Rights***

Business partners must respect the rights of individuals, including their right to access, correct, and delete personal data in accordance with applicable data protection laws. Clear procedures must be in place to handle data subject requests efficiently and in a timely manner to ensure compliance with legal and regulatory requirements.

### ***Data Breach Notification***

Business partners are required to implement robust procedures to detect, report, and investigate data breaches. In the event of a breach, Business partners must promptly notify affected individuals, ASOS, and relevant authorities as required by law. For the avoidance of doubt, Business partners must notify ASOS immediately and no later than 24 hours of the data breach to [dataprotection@asos.com](mailto:dataprotection@asos.com), along with remediation plans to address vulnerabilities. Effective incident response measures must be maintained to minimize risks and prevent future occurrences.

### ***Third-Party Management***

Business partners must ensure that any third parties processing personal data on their behalf comply with all relevant data protection laws and ASOS policies. Contracts with third parties must include explicit data protection clauses to safeguard information and ensure accountability throughout the supply chain. Business partners remain responsible for the actions of their third-party partners.

### ***Training and Awareness***

Business partners must provide regular training to their employees on data protection principles and best practices to ensure compliance. A culture of data protection and privacy must be promoted within the organisation, reinforcing the importance of safeguarding personal data and adhering to industry standards.





## 4.9 Artificial Intelligence (AI)

### Context

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. Compliance with these legal frameworks is essential to maintaining a responsible AI ecosystem.

### Definitions

- **European Union AI Act:** Legislation aimed at regulating AI technologies to ensure they are used ethically and responsibly.
- **Ethical AI Use:** The practice of using AI technologies in a manner that prevents harm and promotes transparency and accountability.
- **Data Privacy:** Measures taken to protect the privacy of individuals whose data is used in AI systems.

### Business partner Responsibilities

#### *Compliance with Laws*

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. Compliance with these legal frameworks is essential to maintaining a responsible AI ecosystem.

#### *Ethical AI Use*

AI technologies must be used ethically and responsibly to prevent harm. Business partners are required to ensure that AI-driven decisions are transparent and explainable, providing clear accountability for their outputs. This commitment to ethical AI use fosters trust and reliability in AI applications.

#### *Data Privacy*

Protecting the privacy of individuals whose data is used in AI systems is a fundamental requirement. Business partners must implement robust security measures to safeguard data and prevent unauthorised access. The handling of personal and sensitive information must align with relevant data protection laws and industry best practices.



## 4.9 Artificial Intelligence (AI) continued

### ***Bias and Fairness***

AI systems must be designed and maintained to be free from bias and discrimination. Business partners are responsible for using diverse and representative training data to ensure fairness and inclusivity. Continuous monitoring and assessment must be conducted to mitigate any potential bias and maintain equitable AI outcomes.

### ***Transparency***

Business partners must maintain full transparency regarding the use of AI technologies and the data they process. Clear and accessible information about AI systems, including their decision-making processes, must be provided to ensure informed engagement with all stakeholders.

### ***Accountability***

Business partners are fully accountable for the AI technologies they develop and deploy. Mechanisms must be established to address and rectify any issues that arise from AI use, ensuring responsible oversight and continuous improvement.

### ***Training and Awareness***

Business partners must provide training to employees on ethical AI use and compliance. A culture of responsible AI development and deployment should be actively promoted to align with ASOS's commitment to ethical and fair business practices.

### ***Third-Party Management***

Business partners must ensure that any third parties using AI tools comply with responsible AI practices. Due diligence must be conducted on all third-party partners to verify adherence to ethical AI standards and prevent risks associated with improper AI deployment.



## 4.10 Cyber Security

### Context

Business partners are required to fully comply with all applicable cybersecurity laws, regulations, and industry standards relevant to their operations and services. They must proactively monitor changes in regulatory requirements and industry best practices to ensure continuous adherence. Any updates or amendments to cybersecurity laws must be promptly integrated into their security frameworks to prevent non-compliance and mitigate potential risks.

### Definitions

- **Cybersecurity Laws:** Legal frameworks designed to protect information systems and data from cyber threats.
- **Incident Response Plan:** A strategy for detecting, mitigating, and remediating cybersecurity incidents.
- **Access Control:** Measures to restrict access to information systems based on user roles and permissions.
- **Multi-Factor Authentication:** Security process requiring multiple forms of verification to access systems.

### Business partner Responsibilities

#### *Compliance with Laws and Regulations*

Business partners are required to fully comply with all applicable cybersecurity laws, regulations, and industry standards relevant to their operations and services. They must proactively monitor changes in regulatory requirements and industry best practices to ensure continuous adherence. Any updates or amendments to cybersecurity laws must be promptly integrated into their security frameworks to prevent non-compliance and mitigate potential risks.

#### *Incident Response and Reporting*

Business partners must maintain and continuously improve an incident response plan to detect, mitigate, and remediate cybersecurity incidents. Any incident impacting stakeholders must be reported promptly with transparent communication. Business partners must cooperate fully with customers, regulators, and authorities to ensure an effective response and minimise harm.

#### *Access Control*

Business partners must enforce strict access controls, granting permissions on a need-to-know basis. Regular access reviews should be conducted to update rights based on role changes or threats. Multi-factor authentication, encryption, and monitoring must be implemented to enhance security and prevent unauthorised access.



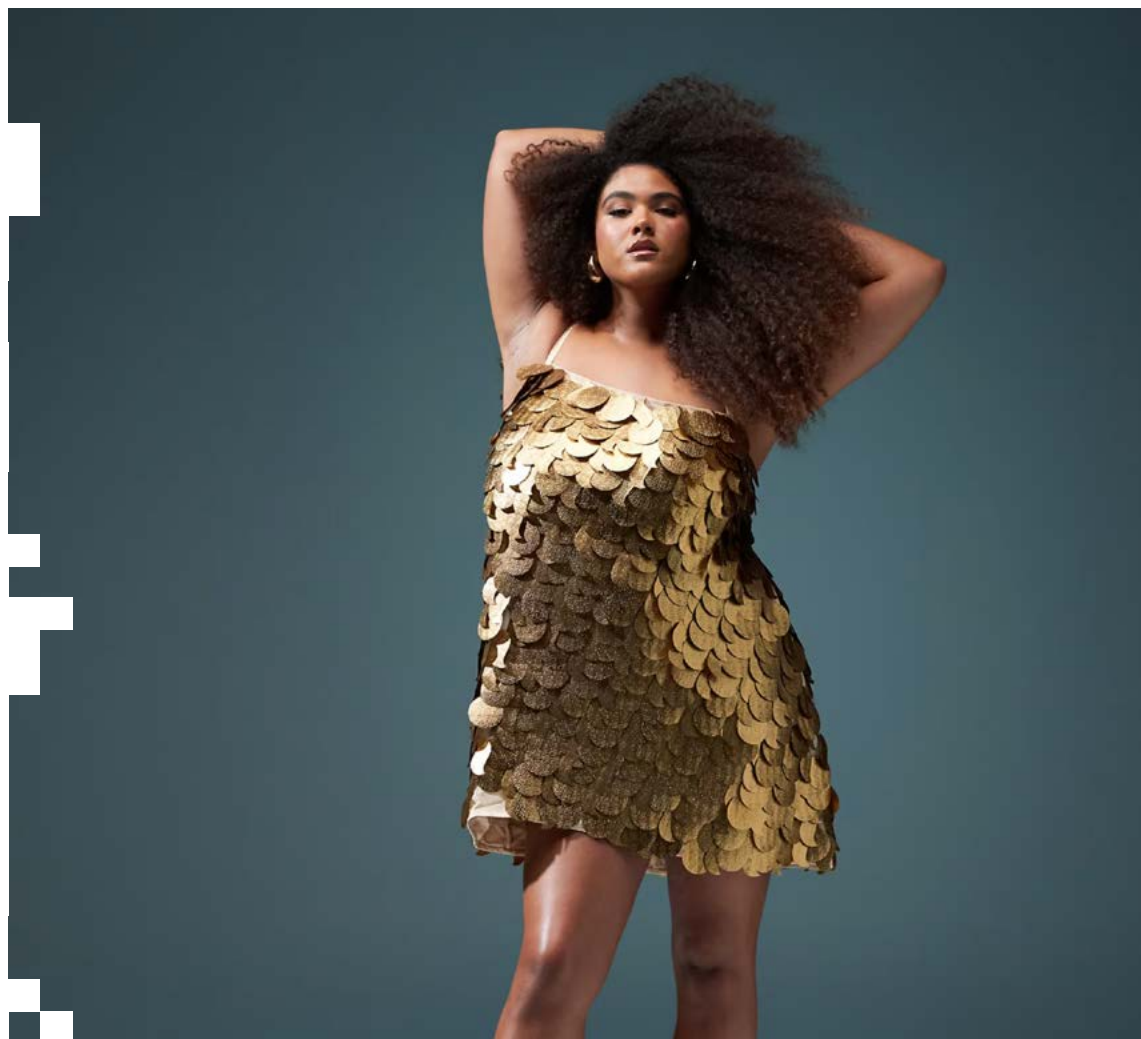
## 4.10 Cyber Security continued

### *Training and Awareness*

Business partners must establish an ongoing cybersecurity training program to educate employees on their roles, emerging threats, best practices, and compliance requirements. Regular training sessions should promote a strong security culture, emphasising proactive risk management.

### *Third-Party Management*

Business partners must implement a strong third-party risk management framework to assess, monitor, and enforce cybersecurity standards among their partners. Due diligence must be conducted before engagement, with strict cybersecurity clauses in contracts. Regular audits and ongoing monitoring are required to ensure compliance, address vulnerabilities, and mitigate supply chain risks.





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## 5.1 Certifying Compliance and Audit

The Business partner shall provide written confirmation to ASOS within 30 days where requested in writing by ASOS:

- a. it has appropriate systems in place to monitor its compliance with this Code; and
- b. it is able to comply with this Code for the duration of its relationship with ASOS.

The Business partner shall provide any additional 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.

In addition to the written confirmation outlined above, ASOS may conduct audits and inspections to verify the Business partner's compliance with this Code. However, ASOS is under no obligation to carry out such audits or inspections.

## 5.2 Self-Monitoring and Reporting Breaches

The Business partner is responsible for monitoring its compliance with the Code and must report any breaches, whether actual or suspected, to [ASOS.Compliance@ASOS.com](mailto:ASOS.Compliance@ASOS.com) as soon as possible. Additionally, the Business partner shall not retaliate against or take disciplinary action against any worker who, in good faith, has reported breaches of this Code, questionable behaviour, or sought advice regarding the Code.

## 5.3 Breach, Remediation and Termination

Where ASOS becomes aware of a breach of this Code by the Business partner or its workers, ASOS may choose to either:

- a. immediately terminate its business relationship with the Business partner, including any contracts; or
- b. request the Business partner to produce a remediation plan outlining the actions the Business partner will take to achieve compliance with the Code, and submit it to ASOS within 30 days of the request.

If the Business partner fails to provide the remediation plan within the specified timeframe or fails to implement it within a reasonable period, ASOS may immediately terminate its business relationship with the Business partner, including any contracts. ASOS may, at its discretion, provide the Business partner with support and resources to assist with remediation. ASOS may also suspend the business relationship with the Business partner while remediation efforts are ongoing.



## 5.3 Breach, Remediation and Termination continued

Where ASOS becomes aware that a Representative has been involved in an incident (or incidents) that would constitute a breach of any requirements under this Code, as if they were directly bound by it, ASOS may either:

- a. terminate its business relationship with the Business partner, including any contracts;
- b. require the Business partner to address the incident (or incidents) with the Representative.

If the Business partner is unable to resolve the issue with the Representative within a reasonable timeframe, ASOS may immediately terminate its business relationship with the Business partner, including any contracts.

ASOS may, at its discretion, provide the Business partner and Representative with support and resources to assist with remediation. Additionally, ASOS may suspend the business relationship with the Business partner while remediation is ongoing. relationship with the Supplier while remediation is ongoing.

## 5.4 Updating this Document

ASOS will review and update this code as required at least on an annual basis. Suppliers will be notified of updates via the Supplier Newsletter. It is the Suppliers responsibility to review any updates to the Code and take any action required to meet new/updated requirements.



6.0

# Appendices



## 6.1 Appendix A – Key Contacts

Topic	Key Contact
ASOS minimum requirements	<a href="mailto:Branded.Engagement@asos.com">Branded.Engagement@asos.com</a>
Environmental Management	
Surplus Stock & Waste Management	
Sustainable Materials	
Animal Welfare & Derived Materials	
Chemical Management	
Traceability	
Human Rights	
Factory Auditing	
Compliance Matters	<a href="mailto:ASOS.Compliance@asos.com">ASOS.Compliance@asos.com</a>
Business Ethics	
Fraud	
Cyber Security & Data Protection	<a href="mailto:Dataprotection@asos.com">Dataprotection@asos.com</a>



## 6.1 Appendix B – Key Summary of requirements

Topic	Minimum	Ambition	Prohibited
Supply chain	<ul style="list-style-type: none"> <li>● Have visibility &amp; document where products are made, including name and addresses of all manufacturing sites (at least tier 1).</li> <li>● Have an unapproved subcontracting policy which is clearly communicated to suppliers.</li> <li>● If requested share information with ASOS on factories used to manufacture goods sold on ASOS.com.</li> <li>● If requested, share copies of audits reports and be able to verify high-risk issues have been remediated.</li> <li>● Be willing to explain enhanced due diligence approach in conflict territories such as Myanmar.</li> <li>● Engage with the communities in which they operate, and with their business partners throughout their supply chain.</li> <li>● Be willing to provide transparency on supply chain and risks to stakeholders including ASOS.</li> </ul>	<ul style="list-style-type: none"> <li>● Map supply chains to tier 4/5.</li> <li>● Publish factory list on Open supply hub, or own website.</li> </ul>	<ul style="list-style-type: none"> <li>● Products and services must not be conducted in sanctioned territories.</li> </ul>



# 6.1 Appendix B – Key Summary of requirements

Topic	Minimum	Ambition	Prohibited
Human Rights	<ul style="list-style-type: none"><li>● Have own Human Rights policy (or equivalent) which outlines your company’s approach to conducting due diligence on human rights including scope, processes, and responsibilities, this must mirror the obligations in this code and be shared with ASOS .</li><li>● Have a modern slavery statement in line with the UK Modern Slavery Act 2015 requirements and updated 2025 guidance focusing on enhanced transparency.</li><li>● Monitor their supply chain and implement policies and procedures, which identify, address and prevent human rights risks and remediate these when necessary.</li></ul>		



## 6.1 Appendix B – Key Summary of requirements continued

Topic	Minimum	Ambition	Prohibited
Modern Slavery, forced labour & Child labour	<ul style="list-style-type: none"> <li>● Immediately notify ASOS at branded.engagement@asos.com should they become aware of any direct or indirect links or suspected links, to the Xinjiang Uyghur autonomous region (XUAR ) or any forced labour, so appropriate next steps can be taken by ASOS and/or the Brands.</li> <li>● Ensure sites —whether looking to onboarding or existing —are not listed on the UFLPA Entity List. In the event of identification, take appropriate steps to responsibly disengage.</li> <li>● 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.</li> <li>● Take proactive measures to prevent child labour.</li> </ul>	<ul style="list-style-type: none"> <li>● Supply chains include country-specific helplines, access to remedy, and a clear process for investigating whistleblowing cases, including follow-up and prevention measures.</li> </ul>	<ul style="list-style-type: none"> <li>● ASOS condemns and prohibits all forms of modern slavery.</li> <li>● ASOS business partners 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.</li> <li>● ASOS has a zero-tolerance policy for child labour within its supply chains.</li> </ul>
Freedom of association & collective bargaining	<ul style="list-style-type: none"> <li>● Where the right to freedom of association and collective bargaining is restricted under law, partners must ensure suppliers allow for the development of parallel means for independent and free association and bargaining.</li> </ul>		





## 6.1 Appendix B – Key Summary of requirements continued

Topic	Minimum	Ambition	Prohibited
No discrimination, harassment or abuse	<ul style="list-style-type: none"> <li>● Ensure that discrimination against any supply chain workers is prevented.</li> <li>● 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.</li> <li>● Women and men shall receive equal pay for work of equal value.</li> </ul>		<ul style="list-style-type: none"> <li>● ASOS does not tolerate harassment, physical, sexual, psychological or verbal abuse, or corporal punishment perpetrated against supply chain workers.</li> <li>● Disciplinary deductions from pay must not be tolerated.</li> </ul>



## 6.1 Appendix B – Key Summary of requirements continued

Topic	Minimum	Ambition	Prohibited
Wages, benefits & working hours	<ul style="list-style-type: none"> <li>● Ensure that their suppliers or any other third parties within the Partners' 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.</li> <li>● Ensure that workers throughout their supply chain are not obliged to work more than the regular workweek and maximum overtime set by local law.</li> <li>● 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.</li> <li>● Homeworkers must be compensated and treated accordingly with this Code of Conduct.</li> </ul>		<ul style="list-style-type: none"> <li>● 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.</li> <li>● Overtime shall be voluntary, compensated at a premium rate and not be requested on a regular basis.</li> </ul>
Safe working environment	<ul style="list-style-type: none"> <li>● Ensure that they and their suppliers provide a safe and hygienic working environment for all employees.</li> <li>● Adequate steps are taken to prevent accidents and injury. Regular and recorded health and safety training is carried out and reassigned for new employees.</li> </ul>		



## 6.1 Appendix B – Key Summary of requirements continued

Topic	Minimum	Ambition	Prohibited
Environmental Impact	<ul style="list-style-type: none"> <li>● Have own Environmental policy (or equivalent) which outlines your company's approach to conducting due diligence on environmental impact including scope, processes, and responsibilities, this must mirror the obligations in this code and be shared with ASOS.</li> <li>● Appoint a senior team member responsible for coordinating environmental management activities.</li> <li>● Monitor their supply chain, implementing policies and procedures, which identify, address and prevent the Environmental risks which may exist.</li> <li>● Have plans in place to remediate risks when necessary, prioritising the most significant adverse impacts.</li> <li>● Seek Greenhouse gas (GHG) and Carbon emission reduction opportunities.</li> <li>● Be willing to provide transparency on environmental risks to stakeholders.</li> <li>● Look to reduce, reuse and recycle products and materials as much as possible to reduce waste in their business operations.</li> <li>● Waste shall be disposed of in an efficient, safe and environmentally responsible way and in full compliance with applicable laws.</li> </ul>	<ul style="list-style-type: none"> <li>● Seek Greenhouse gas (GHG) and Carbon emission reduction opportunities.</li> <li>● Embed environmental management systems.</li> <li>● Use an externally accredited management process with reference to science-based targets and industry standards.</li> <li>● Implement a greenhouse gas reduction target and action plan, or a target approved by the SBTi.</li> <li>● Minimise the use of virgin raw materials, optimising more efficient processes and the use of recycled and lower impact alternatives to fossil fuel-based and non-renewable resources.</li> <li>● Take proactive measures to mitigate water risks, ensuring responsible water use while preserving community resources.</li> </ul>	



## 6.1 Appendix B – Key Summary of requirements continued

Topic	Minimum	Ambition	Prohibited
Chemical Compliance	<ul style="list-style-type: none"> <li>● Business partners of ASOS must ensure that all products supplied to ASOS comply with relevant chemical and product safety regulation requirements outlined in ASOS Chemical Policy, Restricted Substance List ("CPRSL").</li> <li>● Partners shall ensure that their fabric mills, wet processors, component suppliers, product and packaging also comply with relevant chemical regulations requirements in the CPRSL.</li> <li>● Partners must be able to share chemical test reports or certificates with ASOS.</li> </ul>		<ul style="list-style-type: none"> <li>● Products manufactured using substances above ASOS listed threshold on the ASOS CPRSL (Chemical policy restricted substances list) will not be accepted.</li> </ul>



## 6.1 Appendix B – Key Summary of requirements continued

Topic	Minimum	Ambition	Prohibited
Animal Welfare	<ul style="list-style-type: none"> <li>● Have an animal welfare policy that aligns with this code of conduct.</li> <li>● Request and share the species name and country of origin of the animal materials that are used in products sold to ASOS or sold on ASOS.com.</li> <li>● Test materials for fibre composition and submit third-party lab test reports to ASOS if requested.</li> <li>● Clearly label the type of animal-derived material on product care labels and descriptions.</li> <li>● Include the term “faux” for synthetic animal materials.</li> <li>● Check products to ensure compliance.</li> <li>● Be aware that ASOS conducts visual product spot checks and may request third-party lab testing from our business partners.</li> <li>● Discuss any concerns with ASOS Brand Engagement team.</li> <li>● Brands selling cosmetic products in the EU through any of ASOS’ websites must comply with the requirements of EU animal testing ban law.</li> </ul>		<ul style="list-style-type: none"> <li>● No product sold on ASOS should be tested on animals.</li> <li>● Not come from animals slaughtered specifically to produce fashion or beauty products.</li> <li>● Not come from vulnerable, endangered, exotic or wild caught species.</li> <li>● No Silk.</li> <li>● No Angora &amp; other rabbit hair.</li> <li>● No Bone, Horn, Coral, Pearl, Shell (including Mother Of Pearl) or Teeth.</li> </ul>



## 6.1 Appendix B – Key Summary of requirements continued

Topic	Minimum	Ambition	Prohibited
Materials	<ul style="list-style-type: none"> <li>● ASOS business partners must have conducted their own due diligence and;</li> <li>● be able to declare the country of origin of all raw cotton used in the manufacturing of products supplied to ASOS or sold on ASOS.com if requested.</li> <li>● Partners are encouraged to use Better cotton as a minimum standard for cotton product.</li> <li>● Partners must be able to provide required certifications for all more sustainable materials Used in the manufacturing of products supplied to ASOS or sold on ASOS.com if requested.</li> <li>● Animal-derived materials must be a by-product of the meat industry and must adhere to the Five Domains meaning that Animals must be reared, transported, and slaughtered under industry best practices ensuring: Good nutrition, Good environment, Good health, Appropriate behaviour and Positive mental experience.</li> <li>● Animal derived materials must undergo fibre composition or fibre identification testing to ensure prohibited materials are not used and be clearly labelled - Material type must be</li> </ul>	<ul style="list-style-type: none"> <li>● Brand Partners are encouraged to increase the amount of more sustainable materials they are using year on year. Focusing on the materials used in the largest volumes to achieve the biggest impact reduction.</li> <li>● Brand partners are encouraged to source wool from Responsible Wool Standard certified farmers.</li> </ul>	<ul style="list-style-type: none"> <li>● ASOS does not permit the sourcing of cotton or other materials from Xinjiang (China), Turkmenistan, or Uzbekistan or other prohibited regions.</li> <li>● Materials should not come from;</li> <li>● animals slaughtered specifically for fashion or beauty products.</li> <li>● vulnerable, endangered, exotic, or wild-caught species.</li> <li>● Fur: Including Mongolian lambs' fur and Karakul lambskin pelts from aborted or newborn lambs.</li> <li>● Silk.</li> <li>● Angora and other rabbit hair.</li> <li>● Bone, horn, coral, pearl, shell (including mother of pearl), and teeth.</li> <li>● Down feathers from swans are not allowed.</li> <li>● Feather or down from greylag geese are banned .</li> </ul>



## 6.1 Appendix B – Key Summary of requirements continued

Topic	Minimum	Ambition	Prohibited
Materials	<p>indicated on the product care label and what description.</p> <ul style="list-style-type: none"> <li>● Feathers &amp; Down, Alpaca, Mohair: Must be certified to Textile Exchange standards (Responsible Alpaca Standard, Responsible Down Standard, Responsible Mohair Standard). Business partners must be pre-approved to sell Alpaca, Down/Feather or Mohair at ASOS.</li> <li>● Cashmere must be certified by The Good Cashmere Standard or Sustainable Fibre Alliance. The brand must be pre-approved to sell cashmere at ASOS.</li> <li>● Leather and Skin Only from cow, buffalo, sheep, goat, or pig, sourced as a by-product of the meat industry and from producers with good animal husbandry can be used and must meet UK/EU deforestation regulations.</li> <li>● Animal Hair must not be obtained from vulnerable or endangered species or harvested by live plucking. Synthetic alternatives must be clearly labelled as synthetic.</li> </ul>		<ul style="list-style-type: none"> <li>● Recycled cashmere can be used if certified to GRS or RCS but cannot be blended with un-certified cashmere.</li> <li>● Leather and skin Must not be obtained from aborted animals, juvenile animals, animals kept in confinement systems, wild-caught animals, exotic animals, or vulnerable and endangered species.</li> <li>● Merino wool must not be sourced from farmers who practice mulesing.</li> <li>● Animal hair must not be used in makeup or shaving brushes.</li> </ul>





## 6.1 Appendix B – Key Summary of requirements continued

Topic	Minimum	Ambition	Prohibited
Business Ethics and compliance	<ul style="list-style-type: none"> <li>● Operate in compliance with all applicable laws and regulations in force from time to time, including those relating to the matters covered in this Code.</li> <li>● If there is a conflict between any applicable laws or regulations, the provisions of an agreement with ASOS, and the provisions of this Code, the Business partner must comply with the most stringent standard.</li> <li>● Ensure that any gifts, hospitality, entertainment, charitable donations, and sponsorships offered to ASOS employees are reasonable, proportionate, and for legitimate business purposes. All gifts and hospitality must comply with ASOS's Gifts and Hospitality Policy, which outlines acceptable practices and reporting requirements to prevent conflicts of interest.</li> <li>● Disclose any situations where their personal or financial interests could potentially conflict with their obligations to ASOS.</li> <li>● Establish mechanisms to detect and prevent bribery and corruption within their operations and comply with all applicable Anti-Bribery and Corruption laws, including but not limited to the UK Bribery Act 2010 and the US Foreign Corrupt Practices Act</li> </ul>		<ul style="list-style-type: none"> <li>● Business partners must not, directly or indirectly, offer, give, receive, or solicit bribes or any improper advantages in any form.</li> <li>● ASOS has a strict no-retaliation policy and will not tolerate any retaliation against individuals who report violations in good faith.</li> <li>● Business partners are strictly prohibited from conducting business with any sanctioned countries, individuals, or entities. No transactions may be undertaken with parties listed on international sanctions lists unless explicit authorization has been obtained from the relevant authorities.</li> <li>● No employee should face harassment, discrimination, or disciplinary action for reporting misconduct in good faith.</li> </ul>



## 6.1 Appendix B – Key Summary of requirements continued

Topic	Minimum	Ambition	Prohibited
Business Ethics and compliance	<p>(FCPA).</p> <ul style="list-style-type: none"> <li>● Maintain accurate records of all transactions and be prepared to provide evidence of compliance when requested.</li> <li>● Adhere to all relevant Anti-Money Laundering (AML) and counter-terrorist financing laws and regulations and have implemented comprehensive systems to identify, assess, and manage risks.</li> <li>● Implement robust monitoring systems capable of detecting and scrutinising complex or unusual transactions that may indicate illicit activities. All transactions must be screened against the most up-to-date global sanctions lists to prevent dealings with prohibited entities. Any suspicious activity must be promptly investigated and reported to the relevant authorities in accordance with applicable laws.</li> <li>● Required to maintain accurate, detailed, and secure records of all AML and counter-terrorist financing activities. Business partners must provide regular AML and counter-terrorist financing training to employees, ensuring they understand their responsibilities and the legal requirements governing financial transactions.</li> </ul>		



## 6.1 Appendix B – Key Summary of requirements continued

Topic	Minimum	Ambition	Prohibited
Business Ethics and compliance	<ul style="list-style-type: none"> <li>● Fully comply with all applicable sanctions laws and regulations in the United Kingdom and in any other jurisdictions where they operate.</li> <li>● Exercise due diligence to ensure they do not indirectly support or facilitate transactions that would violate ASOS's commitment to sanctions compliance.</li> <li>● Actively encourage employees to report any concerns regarding wrongdoing, unethical behavior, or violations of this Code.</li> <li>● Employees of the Business partner must be made aware of how to report concerns confidentially, without fear of retaliation. A whistleblower protection policy must be in place to safeguard employees who raise concerns.</li> <li>● Provide clear and accessible channels for reporting concerns, such as a dedicated email address, hotline, or anonymous reporting tool</li> <li>● Comply with all relevant laws and regulations, including those related to fraud prevention. This includes adherence to the Economic Crime and Corporate Transparency Act 2024, ensuring all business practices align with legal requirements.</li> <li>● Proactively monitor changes in regulatory requirements and industry best practices to ensure continuous adherence.</li> </ul>		



## 6.1 Appendix B – Key Summary of requirements continued

Topic	Minimum	Ambition	Prohibited
AI, Cyber and Privacy	<ul style="list-style-type: none"> <li>● Comply with all relevant data protection laws including the UK and European General Data Protection Regulation (GDPR), and any applicable local regulations. This includes ensuring the lawful processing of personal data in accordance with legal requirements and industry best practices.</li> <li>● Comply with all applicable AI and cybersecurity laws, regulations, and industry standards relevant to their operations and services.</li> <li>● Notify ASOS withing 24 hours of any data breach and work to minimise the impact of the business and data subjects.</li> </ul>		<ul style="list-style-type: none"> <li>● Excessive or irrelevant data collection must be avoided to ensure compliance with data protection principles and to minimize risks associated with unnecessary data retention.</li> </ul>