



Modern Slavery Statement

September 2024 – August 2025

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CEO Statement

At ASOS, we firmly believe that fashion should never come at the cost of human dignity. As we publish our statement¹, I want to take a moment to reflect on the progress we've made between September 2024 and August 2025 to strengthen our approach. It reflects our ongoing commitment to transparency, accountability, continuous improvement and the responsibility we continue to uphold.

Modern slavery and forced labour remain deeply entrenched global challenges, posing serious risks to human dignity and business integrity. As a company operating within a international supply chain, we recognise that addressing these issues is not just a legal or reputational necessity—it is a moral imperative. We have a dual responsibility: first, to conduct rigorous due diligence to identify, prevent, and mitigate risks of exploitation; and second, to collaborate across our industry to drive systemic change. This is not simply about reducing risk—it's about doing what's right. We're committed to delivering high-quality products to our consumers while actively protecting and empowering the communities we engage with. Forced labour (modern slavery) is a strategic pillar of our Human Rights strategy under Fashion with Integrity (FWI), reflecting our unwavering commitment to fair, safe, and dignified work for all.

The workers within our supply chain are central to everything we do—they are the foundation of our industry and the key to building a fairer future. We believe that giving workers a voice and ensuring their active participation in shaping workplace conditions is key to preventing forced labour and other forms of exploitation. Our vision is rooted in the belief that collaboration—especially among brands—has the power to transform systems and create lasting impact. Some of the key actions we've taken this year reflect this commitment:

- Renewing our Global Framework Agreement with IndustriALL Global Union, to reinforce our commitment to protect workers' rights across our supply chain. The updated agreement introduces a binding dispute resolution mechanism and a joint training programme, aimed at improving workplace conditions and ensuring respect for international labour standards. This renewal reflects ASOS's continued focus on collaboration and accountability in addressing human rights risks.
- Our agreement with the International Transport Workers' Federation (ITF) marks an important step in strengthening our commitment to human rights across some of the highest-risk areas of our supply chain. By working with the ITF's global network and drawing on their expertise, we can better protect the workers behind our logistics and shipping operations and increase transparency at every stage.
- Through our brand engagement programme, we have strengthened our commitment to transparency and continuous improvement in risk management by taking a proactive approach to due diligence with brand partners. This has included engaging in industry forums and with civil societies to help identify and address human rights risks across our extended supply chains. We have also improved our data collection processes and reinforced our policies to better support this work.

These achievements are only possible through the support and collaboration of our partners—customers, suppliers, human rights organisations, audit bodies, and trade unions – who I thank for their support and commitment.

This statement was prepared in accordance with the Modern Slavery Act 2015 and Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act and has been approved by the ASOS Board of Directors on 28th October 2025.



José Antonio Ramos,
Chief Executive Officer

¹ Our tenth Modern Slavery Statement and third under Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act



Our Business

Founded in 2000, ASOS has 18m active customers in over 200 markets. We bring fashion lovers around the world the best and most relevant fashion through our unique own brands including ASOS DESIGN, ARRANGE, COLLUSION, Topshop, and Topman, styled with the most exciting products from local and global partner brands. With our expert in-house design team and agile and flexible commercial model, including ASOS Fulfilment Services, Partner Fulfils, and Test & React, we make the latest trends accessible to all and give customers the confidence to be whoever they want to be.

ASOS is headquartered in London, with 2,727 permanent employees across the UK, Northern Ireland, Hong Kong, Germany, the Netherlands, the US, and Turkey as of 31 August 2025. ASOS operates two third-party fulfilment centres in Barnsley (UK) and Berlin (Germany), along with returns and reprocessing sites in Poznan (Poland) and the Doncaster (UK).

Goods for resale – ASOS brands and labels

ASOS own brands - including ASOS Design, Topshop Topman, and other ASOS-owned and operated brands and labels—are designed in-house and produced by third-party suppliers, operating across a complex global supply chain and distributed through ASOS’s platforms and wholesale partnerships.

As of 31 August 2025, ASOS sourced from 21 countries, with 441 active factories in Tiers 1 and 2, employing approximately 236,750 workers through 164 suppliers. The workforce is nearly evenly split, with 49.87% male and 50.13% female workers. For full visibility, [our interactive supply chain map](#) is available powered by the Open Supply Hub.

ASOS defines tiers as follows:

Tier	Tier definition
1	Finished product manufacturing and shipping to ASOS
2	Subcontracted site for finished product manufacturing
3	Enhancement to product
4	Fabric and components
5	Raw materials

Goods for resale – Partner Brands

We host hundreds of partner brands on our platform, representing c.60% of our business in FY25. Our diverse portfolio ranges from multinational corporations to small and medium-sized enterprises (SMEs), operating across Wholesale, Partner Fulfils, and ASOS Fulfilment Services (AFS). Our Brand Engagement team supports alignment between our brand partners and ASOS’s human rights and environmental standards.

Goods Not for Resale (GNFR)

Procurement is a vital part of our business operations, ensuring we have the tools, services, and infrastructure needed to function effectively every day. Our vendors are grouped into key GNFR categories: supply chain and logistics, technology, marketing, packaging, product, property, as well as facilities management and general services.

These suppliers form the backbone of our organisation, driving everything from operational efficiency to the delivery of exceptional customer experience. We recognise the critical importance of responsible sourcing across these categories and are committed to partnering with suppliers who uphold human rights and fair labour standards. Tackling modern slavery risks within our GNFR supply chains is a fundamental part of our responsibility as a business and a direct reflection of our values.

Policies and contractual controls

We're committed to building and maintaining strong, ethical, and sustainable partnerships, and to human rights, legal compliance, and environmental and social responsibility. Integrity, respect, and transparency are the foundation of our business culture, and we hold ourselves and our partners accountable to these standards.

To ensure a consistent and robust approach to ethical trade across both our Own Brand and Partner Brand operations, we have developed two tailored Codes of Conduct: one for Own Brand Suppliers and another for Business Partners. These Codes outline our expectations and help guide responsible business practices throughout our supply chain.

Both Codes are publicly available and demonstrate our commitment to decent labour practices, aligning with the UN Guiding Principles on Business and Human Rights.

- [Code of Conduct for Own Brand Suppliers](#)
- [Code of Conduct for Business Partners](#)

We want to create the best possible working environment for our ASOSers, supported by the right systems to identify and address problems should anything not be quite right. Our [Whistleblowing Policy](#) encourages employees, contractors, and consultants to report serious concerns—such as fraud or misconduct—confidentially and without fear, ensuring all reports are taken seriously and investigated appropriately.

Risk management framework

We employ comprehensive due diligence processes to identify, assess, and mitigate potential human rights risks across our supply chains, ensuring alignment with our Code of Conduct. Central to this approach is our multi-stakeholder strategy, which values the insights and collaboration of suppliers, factories, trade unions, and civil society organisations to strengthen our understanding and response to emerging risks.

Risk Mapping

Goods for resale – ASOS own brands

We adopt a strategic, risk-based approach to identifying and addressing human rights risks across our global supply chain. This approach combines desk-based research, detailed supply chain mapping, and data-driven risk indicators with insights gathered from unannounced and semi-unannounced audits, worker interviews, and direct engagement with suppliers. Our audit programme identifies risk across our manufacturing (Tier 1 and 2) suppliers against our Code of Conduct and local law.

Our efforts are further strengthened through partnerships with expert organisations that offer deep thematic and regional expertise, enabling us to better understand local contexts and emerging risks. We prioritise visibility in high-risk areas through regular site visits and the presence of ASOS colleagues in key sourcing regions. To support this, we have developed country-specific risk profiles that assess national legislation and key social concerns. These profiles are refreshed every six months to reflect critical developments and emerging social concerns. This enables us to proactively identify gaps, assess vulnerabilities, and collaborate with suppliers and factories to strengthen systems and prevent harm before it occurs.

Enhancing supply chain visibility is a key element of our FWI strategy. It is essential for fulfilling our commitment to respect, protect, and champion the human rights of everyone involved in ASOS operations. Our supply chain is publicly available to access in the form of a downloadable factory list and an embedded interactive map on our [PLC site](#), powered by the Open Supply Hub.

Goods for resale– Partner brands

Through our Brand Engagement programme, we adopt a risk-based strategy to managing supply chain issues linked to brand partners, supported by a suite of due diligence tools. These include self-assessments and internal measures that help us map and measure risk across product supply chains and sourcing territories.

We consolidate supply chain data from the Open Supply Hub, partner websites, and brand disclosures into a regularly updated brand partner factory list, which, combined with intake data, enables targeted engagement with brands sourcing from higher-risk regions.

Our Human Rights and Environmental Due Diligence (HREDD) Framework underpins our risk assessment, driving continuous improvement and reinforcing our commitment to protecting workers across extended supply chains.

Goods not for resale (GNFR)

Our approach to risk assessment within the GNFR supply chain is primarily desk-based and includes the use of SAQs and stakeholder engagement. Our SAQ process plays a critical role in identifying risk areas and evaluating supplier alignment with our ethical standards and applicable local legislation.

Strengthening our due diligence processes remains central to our commitments and will continue to be a key area of focus as we enhance visibility and accountability across our GNFR operations.

Warehousing has been identified as one of the highest risk areas in our GNFR supply chain, driven by widespread third-party labour, subcontracting, and the potential for poor working conditions. These factors increase worker vulnerability and the risk of exploitation. To address this, we developed a Warehouse SAQ in 2024, which we began trialling in 2025. The SAQ is a key part of our ongoing effort to strengthen due diligence processes. We continuously refine our methodology to ensure it identifies the highest risk areas and reaches the most vulnerable workers. We are committed to protecting freedom of association, including in our fulfilment centres, and in 2017 we voluntarily recognised the Community trade union at our Barnsley site.

In FY24 we launched a new partnership with the International Transport Workers Federation (ITF). This partnership continued into FY25, where we signed a legally binding agreement to protect transport workers' rights and enhance the safety, resilience and sustainability of its supply chains. The ITF is now supporting our ongoing monitoring and analysis of shipping data to help identify risks and improve standards for workers in our inbound supply chain, while we expand our focus beyond sea freight to assess risks across third-party logistics.

Standard Operating Procedures

Goods for resale - ASOS own brands

[Audits and remediation](#)

Our audit programme plays a key role in identifying, evaluating, and addressing risks across our supply chain, including those linked to modern slavery. We use in-country colleagues and trusted third-party auditors to assess factory performance against local and international standards, as well as our Code of Conduct. We adopt a country-specific approach to auditing, tailoring our model to reflect the unique social, regulatory, and operational contexts of each region and are committed to supporting suppliers in addressing audit findings through practical and timely remediation.

In FY25, our core audit partners included The Reassurance Network, ELEVATE, Partner Africa, and RK Consultancy. Additionally, we also collaborate with in-country improvement programmes such as ILO Better Work across Bangladesh, Pakistan, Cambodia & Vietnam, International Accord initiatives in Bangladesh and Pakistan, and Fast Forward in the UK (see page 7 for more details).

[Access to remedy \(whistleblowing\)](#)

Country-specific helplines and access to remedy are present across our supply chain to support workers, including the Accord (RSC) in Bangladesh, FAB-L in the UK, and the Migrant Resource Centre in Mauritius. In the last reporting period, we received a total of 33 whistleblowing cases from Albania, Bangladesh, Cambodia, India, Romania, Turkey, and the UK. Out of these, 26 cases have been resolved, while investigations into the remaining cases are still ongoing. The grievance cases included unpaid wages and separation benefits, dismissals and unfair treatment, harassment or abuse, bribery, freedom of association, and other management-related issues. We're working with relevant stakeholders to investigate the ongoing cases and will implement appropriate remediation plans and preventative measures as needed.

We also continued our partnership with Unseen, a UK-based anti-slavery charity that provides safehouses and, community support for survivors of modern slavery and forced labour and operates the UK Modern Slavery & Exploitation Helpline.

Goods for resale - Partner Brands

[Self-Assessment Questionnaire \(SAQ\)](#)

Before inviting brands to complete an ASOS Self-Assessment Questionnaire (SAQ), the Brand Engagement team reviews available disclosures and existing assessments. To reduce duplication, we encourage brands to share SAQs completed for other retailers where appropriate. Whether ASOS-specific or externally completed, these assessments, alongside evaluations of brand transparency, public disclosures, Worldly's Brand & Retail Module (Higg BRM), and B-Corp Impact Reports, help us assess how brands map, monitor, and manage supply chain risks, including modern slavery. Completion of an ASOS SAQ or approved equivalent self-assessment is mandatory prior to onboarding and annually thereafter.

All partners are expected to demonstrate robust risk management practices, including independent audits by recognised bodies, grievance and remediation processes, and clear procedures for addressing non-compliance. We also expect them to comply with all mandatory legal disclosures.

[Risk Rating](#)

To assess compliance, we have revised our grading system to benchmark brands by risk level and compliance maturity. This enables more targeted engagement and support.

[Corrective Action Plans \(CAPs\) and Continuous Improvement](#)

We use Corrective Action Plans (CAPs) to support ongoing monitoring and improvement and have formalised and automated our CAP management process to enable structured follow-up and accountability when gaps are identified. For brands identified as higher risk, we conduct enhanced due diligence, including reviews of audits, CAPs, relevant partnerships or affiliations that support human rights standards, and approaches to subcontracting.

Governance

We operate a continuous cycle of identifying and responding to risks and opportunities across our operations and in our decision-making. Our approach is underpinned by our Enterprise Risk Management Policy and Standard which includes our comprehensive Risk Taxonomy.

Our Board has defined risk appetites for each type of risk category within the taxonomy. This enables us to share risk appetite information across ASOS and ensure appropriate levels of control are applied. Mapping similar risks against the same category also allows us to consolidate, share and escalate risk information. Categories include "FWI Strategy and Programme Management", "Ethical Trade (including supplier management)" and "Ethics, Conduct and Integrity." Responsibility for oversight and management of our risks sits across our Board, Management Committee, and Senior Leaders.

Our Internal Audit & Risk team is responsible for maintaining our enterprise-wide risk management approach, supporting and helping to embed related activities and providing independent assurance over controls and mitigations. Our biggest risks are reviewed and updated bi-annually by our Management Committee and Audit Committee and are also reviewed annually by our Board. Our principal risks include "Not protecting stakeholder safety and wellbeing" which covers potential issues around modern slavery in our value chain. Our Audit Committee maintains oversight of movements in, and the management of, our principal risks which are disclosed in both our half-year financial reporting and annual report & accounts.

Our Partners

Advancing human rights and labour standards depends on strong collaboration. We work with expert partners to identify and address risks, uphold worker rights, and drive ethical practices across our global supply chain. These partnerships bring local insight and specialised expertise, helping us protect and empower workers where it matters most.

Partner organisation	Partnership summary
ACT On Living Wages	ACT is an agreement between global brands and IndustriALL Global Union in pursuit of living wages for workers in textile, garment, and footwear supply chains. As an ACT signatory we are committed to ensuring our purchasing practices support suppliers in improving wages and working conditions.
Anti-Slavery International	Anti-slavery International is a non-governmental organisation, charity and advocacy group working exclusively against slavery. Through our 'critical friend' partnership, we receive guidance that helps strengthen and deliver our FWI programme
Bangladesh RMG Sustainability Council	A tripartite initiative of the Bangladesh RMG Industry, brands and trade unions that conducts safety inspections, training, and operates an independent worker safety and health complaints mechanism. In Bangladesh, we exclusively work with RSC-certified factories.
Better Work	A partnership between the United Nations' International Labour Organisation and the International Finance Corporation, uniting stakeholders to improve working conditions in the global apparel and footwear industry. In Bangladesh, Pakistan, Cambodia and Vietnam, we require eligible factories to enrol in the Better Work Programme.
Ethical Trading Initiative	The Ethical Trading Initiative (ETI) is a leading alliance of companies, trade unions, and NGOs that promotes respect for workers' rights around the globe. ASOS aligns its ethical trade programme with the ETI Base Code, founded on International Labour Organization (ILO) conventions. Through this membership, we collaborate with other brands, civil society, and unions to drive systemic improvements in global supply chains, engage in multi-stakeholder working groups, and strengthen our human rights due diligence approach.
Fashion Workers Advice Bureau Leicester	The Fashion Workers Advice Bureau Leicester (FAB-L) is a community-run initiative focused on positively impacting garment workers by offering free support on workplace and welfare issues. ASOS co-funds FAB-L and fosters relationships between their representatives, trade unions, and our UK factories to facilitate access for workers to their support services.
Fast Forward	Fast Forward is a UK labour standards education, audit, and improvement initiative operated by Stronger Together, designed to support all business in the supply chain to collaborate and improve. ASOS is a founding member of Fast Forward, and our UK factories are audited using their audit methodology.
GoodWeave International	GoodWeave is a non-profit that partners with brands and selected factories to bring visibility to supply chains, protect workers' rights, and provide assurance that products are free of child, forced and bonded labour. GoodWeave works with ASOS in Northern India and Bangladesh, to assess and address risks of child and forced labour in select garment supply chains.
IndustriALL global union	We have an ongoing partnership with IndustriALL, a global union representing 50 million workers across 130 countries in the mining, energy, and manufacturing sectors, advocating for improved working conditions and trade union rights. Our Global Framework Agreement with IndustriALL, first signed in 2017 and recently renewed, supports and safeguards workers' rights to freedom of association and collective bargaining.
International Accord	Established in 2013, the Bangladesh Accord transformed factory safety, saving lives and empowering workers to refuse unsafe work, while also advancing support for union rights. In 2023, it expanded to Pakistan. ASOS is a signatory of the International Accord and we mandate that our factories in Bangladesh and Pakistan are members of the programme.
International Transport Workers' Federation	The International Transport Workers' Federation (ITF) is a democratic, affiliate-led trade union federation, recognised as the world's leading transport authority. Our partnership with the ITF allows us to work together on improving the safety, resilience, and sustainability of our transport supply chains. In FY25, we signed a legally-binding agreement with ITF, to protect transport workers' rights and enhance the safety, resilience and sustainability of its supply chains.

Partner organisation	Partnership summary
KADAV – Kadınlarla Dayanışma Vakfı	KADAV- women solidarity foundation, empowers women in Turkey affected by violence and discrimination, guiding them to support networks and safeguarding them from harm. KADAV supports the implementation of our Child Labour and Remediation Policy by conducting risk assessments and facilitating remediation processes.
Mobilising for Rights Associates	Mobilising for Rights Associates (MRA) is an international non-profit that works across North Africa to advance women's rights, emphasising grassroots changes and collaborating with youth-led NGOs. In Morocco, we formed a network of women's organisations and are piloting a programme on female empowerment in our factories with MRA.
Partner Africa	Partner Africa is a non-profit social enterprise that conducts ethical audits and training across African supply chains. ASOS works with Partner Africa to strengthen human rights due diligence and improve working conditions through local expertise and responsible business practices.
The Centre for Child Rights and Business	The Centre supports ASOS in strengthening child rights within our supply chains. They help us identify and address risks of child labour, provide guidance on effective remediation, and promote family-friendly practices for workers. Through this partnership, we ensure our approach to human rights due diligence includes a strong focus on safeguarding children and supporting responsible business conduct.
The Trades Union Congress	The Trades Union Congress (TUC) is a national trade union centre, a federation of trade unions that collectively represent most unionised workers in England and Wales. The TUC, GMB Midlands, and Unite East Midlands created a Workplace Support Agreement, to access our factories and workers within them, and strengthen industrial relations in the Leicester garment sector.
Unseen	Unseen is an anti-slavery charity based in the UK. It provides safehouses and support in the community for survivors of trafficking and modern slavery. Additionally, it also runs the UK Modern Slavery and Exploitation Helpline. Our partnership provides ASOS with access to Unseen's modern slavery portal, enabling us to monitor and address any reported cases of modern slavery linked ASOS.

Training and Capacity Building

Goods for resale - ASOS brands and labels

Training and workshops play a crucial role in equipping our employees and external partners with the tools to identify, address, and mitigate human rights violations within our supply chain. Ongoing training aims to embed ethical practices, build capacity, and hold ASOS and our partners accountable for mitigating the risk of modern slavery in our global supply chains.

It's mandatory for all ASOS employees to complete Modern Slavery training on an annual basis. This year, we reviewed and updated the training content to reflect evolving legislative trends and best practice expectations. The refreshed module places greater emphasis on identifying risks, supporting remediation, and strengthening supply chain due diligence, ensuring our teams are equipped to uphold our commitment to ethical and responsible business conduct.

As an ACT signatory brand, we have dedicated training modules to build awareness and an understanding of living wages and responsible purchasing practices, particularly for our product teams. These modules provide guidance on how teams can support the payment of higher wages, including best practices around supplier payment terms, order forecasting, and labour costing. We also completed our regular Purchasing Practices Survey this year, engaging internal teams and suppliers.

In July 2025, we hosted an online training session open to all ASOS employees in our commercial teams. The session provided an overview of our priorities in human rights, our due diligence tools, and an update on legislation. It also offered valuable insights from an external NGO and one of ASOS's suppliers, who shared how they embed human rights into their operations.

Goods for resale - Partner Brands

Small- and Medium-sized Enterprises (SMEs) represent over a third of our brand partners across fashion and non-clothing. We have developed an SME roadmap and engagement strategy, offering tools and guidance tailored to SMEs, while our open-door policy ensures we are responsive to feedback from SMEs.

To build capability, we have enhanced the Fashion with Integrity Learning Hub for Partner Brands, with walkthroughs on due diligence policy development and curated external resources. SME feedback has shaped both the SME-specific SAQ and the Learning Hub via surveys and onboarding sessions.

We have trained internal commercial teams on our revised onboarding process and minimum requirements for partner brands, reinforcing the importance of compliance in protecting workers and managing risk. The Brand Onboarding Hub complements this by providing step-by-step guidance, templates, and trackers to streamline setups and improve data accuracy.

Weekly buyer drop-ins resolve onboarding issues in real time, while updated glossaries for fashion and non-clothing brands clarify expectations, terminology and policy implementation.

Key Updates

Goods for resale - ASOS own brands

Gender Empowerment

We continued to expand our gender empowerment initiatives across sourcing regions. Four factories in Morocco were onboarded into the Gender Empowerment Programme, supporting the formation of women's committees in collaboration with NGOs and women's rights defenders. In Tunisia, ASOS sponsored a new centre dedicated to supporting female workers through training and resources focused on gender-based violence, health and safety, and workplace rights. In China, we partnered with The Centre for Child Rights and Business to launch a year-long Gender Transformative Programme, delivering training, policy development, and in-factory activities to promote gender equality and anti-harassment.

Child Labour and Responsible Recruitment

To mitigate child labour risks, particularly during school holidays and youth internships, we distributed guidance on legislation and responsible recruitment to 53 suppliers in China, in partnership with The Centre for Child Rights and Business. Additionally, ASOS renewed its Memorandum of Understanding with GoodWeave International in Bangladesh to strengthen oversight and remediation efforts in the lower tiers of its supply chain.

Worker Protection and Social Insurance

We joined the Employment Injury Scheme (EIS) Pilot in Bangladesh, led by the ILO and GIZ, marking the country's first national employment injury insurance for garment workers. The scheme provides compensation for permanent disability and financial support to dependents in the event of a worker's death.

Freedom of Association and Union Engagement

In August 2025, we renewed our Global Framework Agreement (GFA) with IndustriALL, reinforcing our commitment to fair treatment and union collaboration. As part of this agreement, ASOS and IndustriALL will deliver joint training to key suppliers to strengthen their understanding of workers' rights and foster sustainable, rights-based dialogue within factories.

Forced Labour and Ethical Sourcing

We upheld commitments under the [Uyghur Forced Labor Prevention Act \(UFLPA\)](#) and the Coalition's Call to Action to [End Uyghur Forced Labour](#) in the Xinjiang Uyghur Autonomous Region. In the last reporting period, ASOS suspended onboarding of three China-based suppliers linked to Xinjiang as part of our due diligence processes.

Goods for resale – Partner brands

Targeted due diligence strategies for SME and non-clothing partners

This year, we introduced a tailored SAQ for Small- and Medium-sized Enterprise (SME) brands to improve accessibility and relevance, shaped by their feedback. We also launched a bespoke due diligence strategy and SAQ for non-clothing partners across jewellery, electronics, and Face + Body, developed through stakeholder engagement and risk assessment insights to address modern slavery risks.

The non-clothing strategy prioritises risks such as forced labour in commodity sourcing and unsafe mining practices. By focusing on commodity-level risks and aligning with evolving regulations, it strengthens our ability to identify and mitigate modern slavery risks across complex supply chains. It also ensures our non-clothing brand partners meet ethical standards from the outset, reinforcing our role as a responsible partner.

High-risk territories approach

We have developed an internal policy titled *Partner Brands Approach to High-Risk Territories and Conflict-Affected Areas*, which outlines our process for identifying, assessing, and managing risks in sourcing regions with elevated human rights concerns. The policy aims to reduce the risk of human rights violations and environmental harm within our third-party brand supply chains, while strengthening accountability across our brand portfolio.

In Myanmar, we have taken steps to strengthen our due diligence through a brand portfolio-wide risk analysis. This includes direct engagement with brands, a survey aligned with OECD guidance, and targeted oversight to support responsible sourcing and ethical operations in a high-risk context. This work is ongoing and reflects the approach we apply to all high-risk territories under our internal policy - ensuring consistent, proactive management of human rights risks.

Goods not for resale

In July 2025, we conducted a strategic review of our GNFR supply chain, ensuring our human rights approach remains measurable, actionable, and impact driven. Building on this, a gap analysis was initiated in August 2025 to assess the strengths and limitations of the current due diligence framework considering emerging human rights legislation. The findings will inform the next phase of GNFR strategy updates, helping to strengthen alignment with global standards and enhance long-term supply chain resilience.

International Transport Workers' Federation (ITF) - In August 2025, ASOS signed a formal agreement with the International Transport Workers' Federation (ITF), a global organisation that advocates for the rights of 16.5 million transport workers through more than 700 affiliated unions across 150 countries. The ITF plays a pivotal role in driving collective action to improve labour conditions across the transport sector. This partnership represents a key step forward in strengthening human rights due diligence within our GNFR supply chain.

Transport remains a high-risk sector for worker exploitation due to limited visibility in complex supply chains. Our partnership with the ITF helps us assess human rights risks in inbound logistics, including vessel-level analysis. In July 2025, we began exploring ways to expand this work to land transport, warehousing, and shipyards to strengthen our due diligence across logistics.

Warehouse SAQ - Building on the Warehouse SAQ, which was developed in 2024 and trialled in 2025, we are now focused on evolving the tool to deliver greater impact and usability. As part of our broader commitment to strengthening due diligence across our GNFR supply chain, we are enhancing the SAQ to more effectively identify high-risk operational areas and better capture data related to vulnerable worker groups.

These enhancements will position the SAQ as a central tool in our supplier engagement strategy, enabling us to proactively address human rights risks and support continuous improvement across our warehouse operations. The ITF will be an essential partner in shaping the development of this SAQ in the future.

Measuring Effectiveness and Forward Commitments

To address direct and indirect risks of modern slavery and child labour, we implement a comprehensive range of processes and procedures and monitor effectiveness through key performance indicators, including:

- Completion rates of Human Rights training modules
- The number of whistleblowing cases and grievances reported and resolved globally
- Progress against our Human Rights strategy milestones

We recognise the need for continuous improvement and will continue to strengthen our approach to due diligence and remediation across our supply chain and business operations.

For our own brand suppliers, we'll expand gender empowerment and grievance mechanisms, ensuring fair treatment and safe reporting channels. Partnering with IndustriALL, we'll train suppliers on workers' rights and factory dialogue, with updated modules aligned to EU legislation and focused on responsible purchasing and living wages.

To support our brand partners, we're working with peers in the industry to improve interoperability across systems, data, and due diligence processes.

And for our GNFR suppliers, we'll enhance our Supplier Assessment Questionnaire (SAQ) to better identify high-risk operational areas and build on our partnership with the International Transport Workers' Federation (ITF) to expand our transport and logistics due diligence to include grievance mechanisms and ethical recruitment training.

Appendix

ASOS in Canada:

Gross Sales Units FY25

ASOS own brands and partner brands	238,204
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