



Version: 1.0

This document applies to all Suppliers who provide goods or services to ASOS relating to own brand product. This excludes our partner brands and GNFR suppliers.

Effective from July 2025

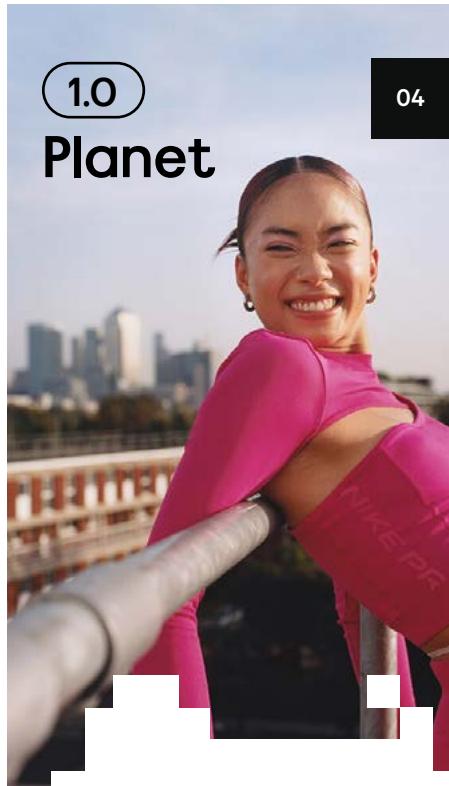
asos

**Code of Conduct &
Policies for Own Brand
Manufacturers & Suppliers**

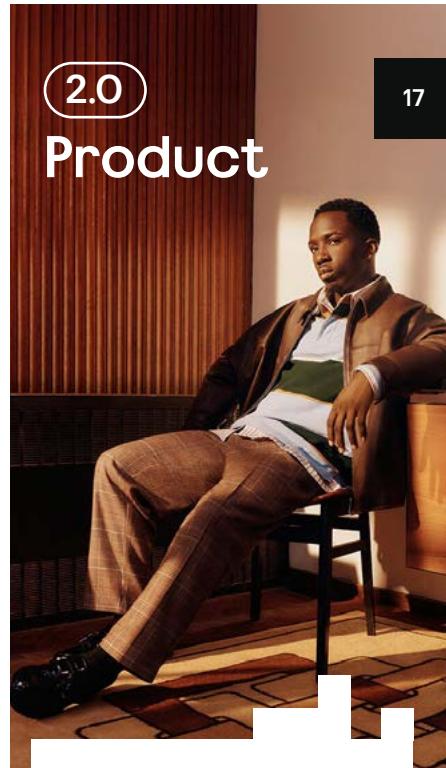
Contents

Introduction

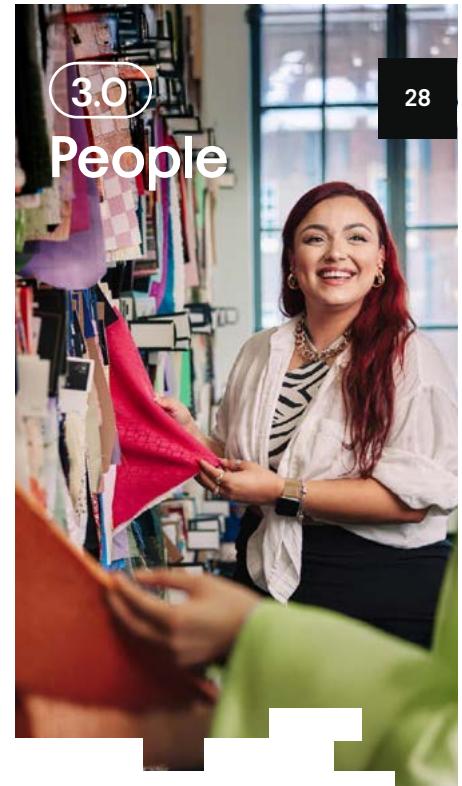
03



1.0 Planet



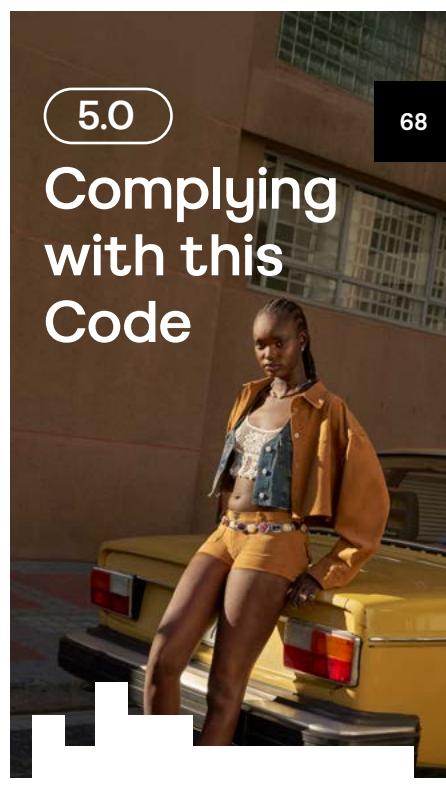
2.0 Product



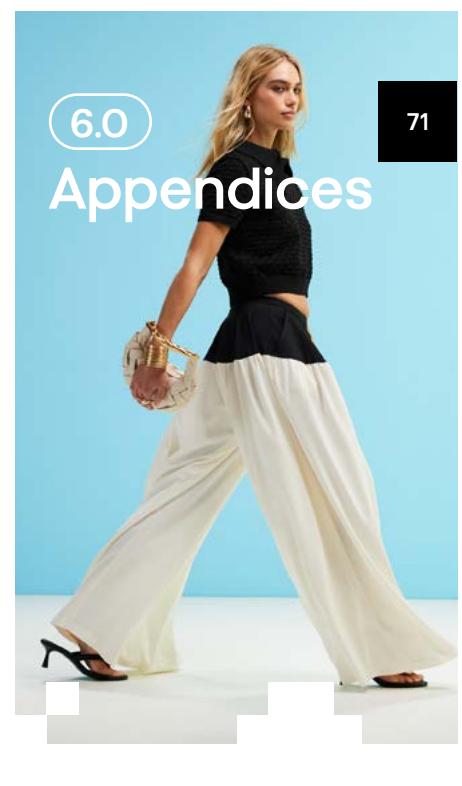
3.0 People



4.0 Business Ethics and Compliance



5.0 Complying with this Code



6.0 Appendices





Introduction

About this Document

This Supplier Code of Conduct ('Code') establishes the minimum standards and behaviours that must be met by any entity that supplies products or services to ASOS. ASOS values its relationship with suppliers, aiming for long-term partnerships based on trust and respect. ASOS collaborates with diverse suppliers globally, addressing various risks. The Code outlines standards to ensure responsible, ethical, and legal supplier conduct.

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.

Key definitions and scope

In this Document:

- 'Supplier' means a body corporate, partnership or individual that provides goods or services to ASOS OR one or more members of the ASOS group of companies. The term 'supplier' in this document refers to all associated parties within ASOS's supply chain, including subcontractors and any other entities acting on the supplier's behalf. Suppliers are responsible for ensuring that this policy is communicated to, understood by, and upheld by all such parties.
- 'Worker' means any individual whom the Supplier employs, hires or engages, or otherwise uses to conduct its business.
- 'Representative' means the Supplier's suppliers, vendors, agents, and subcontractors who form part of ASOS's supply chain.
- 'Facility' means a manufacturing location that is part of the ASOS supply chain in Tiers 1-4.

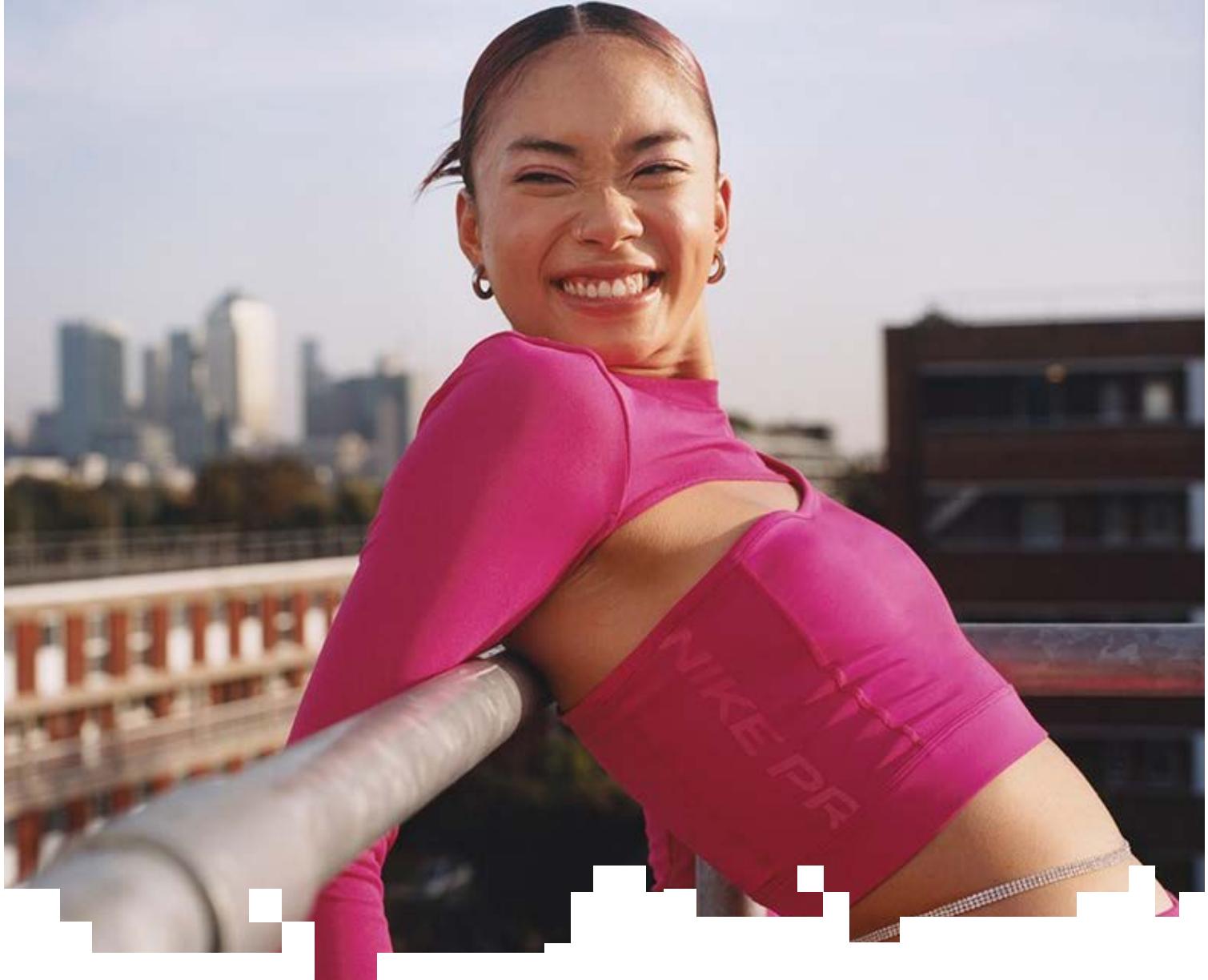
Who must comply?

The Supplier shall comply with the Code and shall ensure that its Workers are aware of this Code and comply with it.

Supplier's commitment

The Supplier agrees that:

- It will comply with the requirements in this Document.
- It has appropriate systems in place to ensure continuous compliance and to demonstrate such compliance.
- Any breach of the requirements set out in this Document will allow ASOS to terminate its relationship with the Supplier with immediate effect.



1.0

Planet

1.1 Environmental Data Gathering	05
1.2 Environmental Management Systems	06
1.3 Greenhouse Gas Emissions and Energy Use	07
1.4 Waste Management	09
1.5 Water Use	11
1.6 Flooding Risk	12
1.7 Wastewater Discharge	13
1.8 Air Pollution	15
1.9 Environmental Monitoring	16



1.1 Environmental Data Gathering

Context

Environmental data is critical in supporting the delivery of sustainability targets and enhancing environmental standards throughout the supply chain. For ASOS, this data contributes to our carbon emissions targets and water strategy.

Definitions

- Higg Facility Environment Module (Higg FEM): A comprehensive assessment tool focusing on environmental performance across site operations, energy use, water management, and waste.
- Higg Facility Data Module (Higg FDM): A simplified version of the FEM for low-volume Tier 1 sites, completed quarterly.

Supplier Responsibilities

ASOS requires all Tier 1, Tier 4 and applicable Tier 3 facilities (e.g. laundries) to complete the Higg Facility Environment Module (FEM) annually, by April of each year. Suppliers and subcontractors are responsible for ensuring all associated Tier 1-4 facilities comply.

Tier 1 – Manufacturing Facilities.

Tier 1 factories producing small volumes for ASOS may use the Higg Facility Data Module (FDM), a cut-down version of the FEM, completed quarterly.

Strategic Tier 1 factories producing large volumes (currently defined as over 250K units annually) for ASOS should have their FEM verified by an approved third party <https://howtohigg.org/higg-fem-verification-program>. The ASOS Sustainability team will advise facilities of the cut off volumes for each type of facility on a yearly basis.

When completing the FEM all facilities must complete as a minimum:

- Site information and permitting.
- Energy, EMS, waste and water to achieve Level 2 (baseline measurement, target setting and reporting).

Tier 4 (fabric mills and wet processors) and wet Tier 3 (laundries) Facilities.

ASOS requires all core Tier 4 mills and wet processors to complete the Higg FEM annually. The cut off to define core will be a minimum volume of fabric supplied to ASOS factories, to be advised by ASOS annually. We require Suppliers to engage with their core Tier 4 mills, wet processors and laundries to achieve this.

BEST PRACTICE: Achieve Level 3 in all of the Higg FEM categories



1.2 Environmental Management Systems

Context

An Environmental Management System (EMS) is an essential tool for identifying, tracking, and managing the environmental impacts of factory operations over time. It is critical for understanding environmental risks, ensuring legal compliance, and driving continuous improvement.

Definitions

- **Environmental Management System (EMS):** A structured framework that helps factories monitor and manage their environmental impacts, including energy use, waste, water, and health and safety risks.
- **Environmental Action Plan:** A documented strategy that outlines a facility's key environmental impacts and sets measurable targets for improvement, such as greenhouse gas reduction and waste management.
- **ISO14001:** A globally recognised certification for an environmental management system that represents leading practice in sustainability management.

Supplier Responsibilities

ASOS requires all facilities involved in production of our products to have an effective EMS. The expectations of this include:

- Facilities must identify significant environmental impacts associated with current operations within Tier 1-4 factories.
- Facilities must set out environmental management activities to reduce their environmental impacts and reduce health and safety risks across Tier 1-4 factories.
- Facilities must appoint a senior manager, responsible for coordinating the facilities' environmental management activities. Suppliers should also appoint a senior manager to co-ordinate the environmental management and performance of their supply chain, including the onward reporting of environmental activities to ASOS via completion of the Higg FEM.
- Facilities must offer information and opportunities to upskill workers, sub-contractors and suppliers on wider environmental management activities and practices (e.g. improving efficiency of machinery or processes, energy or water saving practices etc.)
- Suppliers and subcontractors must ensure that each facility has in place an Environmental Action Plan covering their key environmental impacts and targets to reduce them. The action plan should include energy and greenhouse gas reduction targets, waste management and waste disposal, and water reduction targets. For Tier 4 mills and wet processors this will additionally include wastewater treatment plans, chemical use, and air emissions (if applicable). Evidence of having such plans should be presented in the Higg FEM by the achievement of Level 2 (target setting) in these categories.

BEST PRACTICE: Engage leadership and workers in formulation and implementation of the EMS.



1.3 Greenhouse Gas Emissions and Energy Use

Context

Climate change poses critical threats to life, requiring urgent action across industries to mitigate its impacts. Failure to reduce emissions and adapt to climate change poses risks to environmental sustainability, worker welfare, and business continuity.

ASOS is targeting a 42% reduction in supply chain GHG emissions by 2030 in line with the Paris Accord's 1.5°C pathway. ASOS is committed to achieving its GHG emission reduction goals through targeted initiatives within its supply chain, including energy efficiency improvements, renewable electricity adoption, and phasing out coal.

Definitions

- **Paris Accord 1.5°C Pathway:** A global effort to limit temperature increases to 1.5°C above pre-industrial levels to avoid severe climate impacts.
- **Higg Facility Environment Module (FEM):** A tool to assess environmental performance, requiring facilities to report energy use and reduction actions annually.
- **Sustainable Biomass Certification:** Internationally recognised certifications ensuring biomass use complies with responsible forestry practices, particularly in high-risk countries.

Supplier Responsibilities

This applies to Tiers 1 to 4 of ASOS facilities. Suppliers are responsible for using laundries, mills and wet processors that meet these requirements.

Facilities must track all energy sources and set a baseline for energy use. This includes energy production on site such as gas for boilers and diesel for transport; and also, that bought in from another party, such as purchased electricity, purchased steam. This information should be tracked via energy bills or meters and submitted to the Higg FEM annually.

Facilities must have an action plan to reduce the consumption of energy and/or greenhouse gases. This should be part of the abovementioned Environmental Action Plan and should be shared as part of Higg FEM annually in achieving Level 2 in Energy.

The action plan should include:

- Identification of the equipment using the most energy.
- Establishing a baseline and setting targets for the most significant energy sources.
- Set out specific actions that will achieve these targets, such as fuel switching, purchase of renewables, investment in energy saving measures such as LED lighting, insulation improved maintenance, energy recovery systems. It should include ASOS-specific targets of:
 - ▲ Use of renewable electricity, in whole or in part, by 2027.
 - ▲ Phase out of on-site use of coal by 2028.
- Report progress against these targets.



1.3 Greenhouse Gas Emissions and Energy Use continued

Facilities that are using woody biomass as an alternative to coal, such as timber offcuts, brash or sawdust and are also located in countries with high risk of illegal logging and poor forestry practices, must use biomass that has an internationally recognised sustainability certification such as FSC. These countries include Madagascar, Indonesia, Cambodia, Vietnam, Thailand and Brazil. Other biomass crops in any country that are grown specifically for burning must also be similarly certified. This does not apply to the use of crop wastes and residues.

BEST PRACTICE:

1. **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.**
2. **Procure 100% of electricity and thermal energy needs from renewables. Supporting the electrification of all processes including heat raising.**

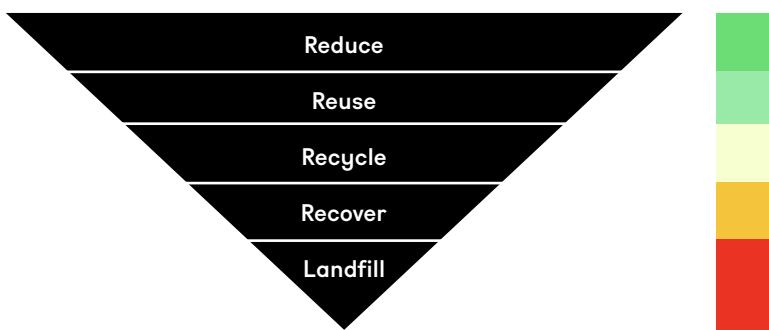




1.4 Waste Management

Context

Incorrect management of waste can be a substantial environmental risk. It is also a loss of natural resources and usually a contributor to increased greenhouse gas emissions. ASOS uses the waste hierarchy to shape its approach to its own 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.



Definitions

- **Waste Hierarchy:** A framework prioritising waste management practices from prevention and minimization to recycling, reuse, and finally disposal with material or energy recovery.
- **Higg Facility Environment Module (Higg FEM):** A tool for tracking waste and environmental impacts, requiring facilities to report key waste metrics annually.

Supplier Responsibilities

We require facilities in Tiers 1-4 making ASOS products to:

- Prioritise waste reduction by setting reduction targets and reporting on these via the Higg FEM, achieving Level 2 minimum.
- Reuse and recycle products and materials whenever possible. We particularly encourage the reuse of fabric scraps and roll ends to make other products, and the recycling of fabric cuttings in a circular way back into fibre for respinning as yarn.
- If the above is not possible, then energy recovery by controlled and appropriately permitted incineration is preferable to landfill.

Facilities must:

- Ensure compliance with local waste management regulations.
- Identify all waste sources (e.g. packaging, material offcuts, excess stock etc.) and track the total volume of each waste source.
The volumes should be shared as part of Higg FEM annually.
- All waste streams must be segregated into hazardous and non-hazardous waste and be stored separately (if applicable).
- Inventories of hazardous and non-hazardous waste should be kept.



1.4 Waste Management continued

- Suppliers and subcontractors are responsible for ensuring training and appropriate health and safety equipment is provided to all employees handling hazardous waste.
- Any and all containers of hazardous waste shall be in good condition, and not damaged in any way which may compromise its ability to isolate hazardous waste, and all containers must be clearly labelled (if applicable).
- Open burning or dumping of waste on-site or uncontrolled on-site incineration is strictly prohibited. No further orders will be placed until a corrective action plan has been implemented.
- Disposal of residual waste in unregulated or unlicensed sites is strictly prohibited. Authorised contractors must be used for waste removal. Sites used for the ultimate disposal of residual waste e.g. landfill or incineration must be audited at a minimum every 3 years for regulatory compliance and good practice and a record, including photographs, kept of the audit. If a facility disposes of waste at an unregulated site, no further orders will be placed until a corrective action plan has been completed.

BEST PRACTICE: divert at least 90% of waste from controlled incineration or landfill; to recycle or reuse fabric waste as products or yarn in a circular system.





1.5 Water Use

Context

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. Suppliers in water-stressed regions must take proactive measures to mitigate risks, ensuring responsible water use while preserving community resources.

Definitions

- **High Water Stress:** Areas where water demand exceeds supply, assessed through tools such as the WWF Water Risk Filter or WRI Aqueduct.
- **Water Balance Analysis:** A method of evaluating water inputs and outputs to identify heavy water usage processes and opportunities for reduction.
- **Higg Facility Environment Module (Higg FEM):** A tool for tracking and reporting water usage, efficiency improvements, and reduction targets annually.

Supplier Responsibilities

This applies to Tiers 1 to 4 of ASOS facilities. Suppliers are responsible for using mills and wet processors that meet these requirements.

Facilities must ensure all water sources such as ground water, municipal supply, surface water or rainwater harvesting are identified and water use is measured and tracked, preferably by meter. These results should be reported annually through the Higg FEM. Facilities must be in compliance with water abstraction limits and licencing.

Facilities must identify if they are located in regions of high or very high water stress using on-line tools such as the [WWF Water Risk Filter](#) or [WRI Aqueduct](#). If a facility is located in such a region it must additionally:

- Conduct a water balance analysis and identify processes that are heavy water users.
- Set targets for reduction of water withdrawal for industrial processes reported through the Higg FEM.
- Have a water efficiency action plan that sets out how the targets will be achieved. This could include investment in low water dyeing, the use of reverse osmosis to recycle process water or better process control. Such plans should not compromise the availability of water to personnel for hygiene and other purposes.

BEST PRACTICE: Facilities in water stressed regions should invest in rainwater harvesting and other methods to reduce water abstraction; demonstrating positive impact on water availability in the local community; enabling high levels of water reuse/recycling; and investing in advanced dyeing and finishing techniques with minimal water consumption.



1.6 Flooding Risk

Context

Climate change is increasing the risk of flooding in those areas already at high risk.

Definitions

- High or very high flooding risk is assessed through tools such as the WWF Water Risk Filter or WRI Aquaduct
- Mitigation could include physical measures (e.g. barriers) or commercial (e.g. ability to switch production)

Supplier Responsibilities

This applies to Tiers 1 to 4 of ASOS facilities. Facilities should identify whether they are in an area of high or very high flood risk and possess a flood resilience plan that eliminates or mitigates the flood risk.



1.7 Wastewater Discharge

Context

Wastewater mismanagement poses significant environmental, legal, and reputational risks. Discharge of untreated wastewater can severely impact ecosystems and communities, especially in regions of high water stress.

ASOS is a signatory brand of ZDHC (Zero Discharge of Hazardous Chemicals), and any industrial wastewater should meet the latest [ZDHC Wastewater guidelines](#) including [ZDHC MRS \(Manufacturing Restricted Substances List\)](#).

The ZDHC Wastewater Guidelines set a unified expectation for wastewater quality in the textile, apparel, leather, and footwear industry. This includes reporting limits for traditional (conventional) parameters and hazardous chemical parameters, sampling and reporting frequency. By doing so, the Wastewater Guidelines aim to reduce the workload and cost faced by suppliers in satisfying multiple brand-specific testing requirements. Please use this link to the [ZDHC Wastewater Guidelines V.2.2](#).

Definitions

- **Zero Discharge of Hazardous Chemicals (ZDHC):** A global initiative to eliminate the discharge of harmful chemicals into the environment by setting wastewater quality standards across industries.
- **Higg Facility Environment Module (Higg FEM):** A tool for tracking and reporting wastewater discharge volumes and quality annually.
- **ClearStream Report:** A document generated for each wastewater testing cycle, outlining compliance with ZDHC parameters and identifying any non-conformities.

Supplier Responsibilities

- Suppliers and subcontractors' facilities shall identify wastewater discharge sources and monitor the quantity and quality of emission in accordance with local regulatory requirements. This should be shared as part of Higg FEM annually.
- Facilities shall train at least one individual in local regulation for wastewater regulation.
- Facilities shall ensure that they have and maintain the appropriate license and/or permit for wastewater discharge.
- Facilities shall treat all wastewater in a fully functioning, adequately sized effluent treatment plant (ETP) either on-site or in a shared ETP off-site before discharge. Discharge of untreated wastewater to surface water or to land is strictly prohibited.
- ETP sludge shall be properly and responsibly disposed of in accordance with local legislation and in line with the waste requirements in this Code (See Section 1.4).
- If the facility uses an on-site ETP, it shall have an effective and documented back-up procedure in case of ETP failure.
- Wet processors discharging more than 15 m³/day must comply with ZDHC waste water guidelines. Suppliers are required to conduct wastewater sampling and testing.



1.7 Wastewater Discharge continued

Waste Water Requirements:

- Perform wastewater testing twice a year i.e. during the October and April cycles.
- Generate a ClearStream Report for every wastewater testing cycle.
- Meet all reporting limits for ZDHC MRSL parameters.
- Meet, at a minimum wastewater Foundational Limits for all Heavy Metals.
- Meet, at a minimum wastewater Foundational Limits for all Conventional Parameters and Anions for direct discharge facilities.
- In case of non-conformities in the ClearStream Report, suppliers should perform a Root Cause Analysis (RCA) and upload a Corrective Action Plan (CAP) in their ZDHC Gateway supplier account.

Non-conformity with ZDHC requirements more than twice in four years will lead to no further orders being placed for at least three years combined with the completion the CAP.

In areas of high water stress, it is expected that facilities will have invested in effluent minimisation and recycling (See Section 1.5).

BEST PRACTICE: Achieve ZDHC Progressive or Aspirational levels of performance;
implementation of wastewater recycling.



1.8 Air Pollution

Context & Risk

Air emissions from manufacturing processes can significantly impact the environment and public health if not properly identified, monitored, and controlled. Common emissions include nitrogen and sulphur oxides from combustion, dust particulates, refrigerants from air conditioning units, and volatile organic compounds (VOCs) from adhesives. Of particular concern is Dimethyl Formamide (DMF), a solvent used in the production of polyurethane materials, which poses toxic risks if not managed appropriately. Proper air emissions management is critical for regulatory compliance and environmental stewardship.

Definitions

- **Higg Facility Environment Module (Higg FEM):** A tool for tracking and reporting air emissions data annually.
- **Scope 1 & Scope 2 GHG Emissions:** Scope 1 refers to direct emissions from owned or controlled sources; Scope 2 encompasses indirect emissions from purchased electricity, steam, or heat.

Supplier Responsibilities

- Facilities in Tiers 1-4 should know the identity and sources of air emissions from on-site processes. This could include nitrogen oxides and sulphur oxides from combustion processes, dust particulates, refrigerants from air conditioning units, and volatile organic compounds (VOCs) from adhesives used in shoe factories or from polyurethane coating.
- Facilities should use this information to create an inventory of air emissions. Facilities should report emissions on a yearly basis using the Higg FEM as well as required by any local regulations. Facilities must ensure that they have any permits required for air emissions and are in compliance with these permits.
- Facilities should possess an action plan to minimise and reduce air emissions. This could be through better equipment maintenance, or replacement following guidance such as [EU BAT](#).
- Uncontrolled release of toxic solvents such as dimethyl formamide (DMF) is not permitted either within or without the facility. Such chemicals should either be collected for recycling or destroyed e.g. by using an emissions oxidation unit.

BEST PRACTICE: report against international guidelines such as [ZDHC Air Emissions Guidelines](#); to eliminate air emissions of hazardous chemicals by substituting materials or processes.



1.9 Environmental Monitoring

ASOS reserves the right to audit environmental plans, records and operational sites for compliance with its own and legal requirements. Suppliers and subcontractors shall maintain a complete set of records to trace the supply chain of all Products supplied to ASOS under this Code. The Supplier shall promptly provide ASOS with full and accurate information 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.

Terms in this Code are monitored through facilities' annual completion of the Higg FEM, alignment with other ASOS policies named in this document, and the transparency of information shared between ASOS and supplier factories.

Suppliers and subcontractors are obliged to comply with the ASOS Subcontracting requirements in this Code (See Section 3.5) to keep ASOS informed at all times of where each product is being produced and through which factory.

Training, guidance and support is provided through:

- The ASOS supplier extranet, where sustainability resources are available such as how to acquire renewable electricity in individual countries.
- Supplier sustainability webinars, usually held quarterly.
- Worldly have a range of training resources on how to complete the Higg FEM and how suppliers can make best use of it themselves.
- The ASOS sustainability team are able to help with individual supplier and prospective supplier enquiries.



2.0

Product

2.1 More Sustainable materials	18
2.2 Animal Welfare	20
2.3 Chemical Management	23
2.4 Metal contamination	25
2.5 Rejected Stock	26
2.6 Supply Chain Traceability (T4 & T5)	27



2.1 More 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 are committed to increasing the use of more sustainable materials year-on-year, focusing on Own Brand clothing products. Each year we set a target for the proportion of more sustainable materials used in our products for the year ahead. This ensures accountability while recognising market uncertainties.

Definitions

In general, a material type must meet all of the following criteria to be counted by ASOS as a “more sustainable material”. However, due to the varied materials used in our products and the different processing methods, each material has different challenges in terms of its sustainability impacts – and these can occur at different stages of fibre/material production. For this reason, the general criteria below are applied with some flexibility to specific materials. In some cases, we set additional criteria or minimum requirements due to heightened risks.

ASOS General Criteria for More Sustainable Materials

1. Lower Environmental Impact: The production of the raw material must have a lower environmental impact than the conventional form verified by credible, independent evidence.
2. 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.
3. 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.
4. 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.

Supplier Responsibilities

In line with our commitment to increase our use of more sustainable materials year on year we are initially focusing on our largest three materials by weight: Cotton, Polyester and Man-Made Cellulosic Fibres. We are setting incremental annual targets internally to ensure increased uptake of these fibres. Below is a description of the key risks associated with these fibres and any minimum requirements ASOS have set to address these risks. More details can be found in our Sustainable Materials policy.

Suppliers must actively engage with ASOS teams to increase the amount of sustainable materials within their products. Where Suppliers are sourcing one of our ASOS Accepted More Sustainable materials suppliers must obtain all required certification and submit to ASOS within the specified timeframes.



2.1 More Sustainable materials continued

A full list of ASOS Accepted More Sustainable material types and certificate requirements for suppliers can be found in our Sustainable Materials policy.

Cotton

Cotton has long been recognised as a resource-intensive crop, with conventional cotton farming techniques requiring large quantities of water, pesticides and fertilisers. Cotton farming is also associated with serious human rights risks in some cotton production regions, including forced labour and child labour.

As a result of these risks, ASOS requires that as a minimum:

- Suppliers must declare the country of origin of all raw cotton used in the manufacturing of products supplied to ASOS.
- ASOS does not permit the sourcing of cotton from Xinjiang (China), Turkmenistan or Uzbekistan.
- All Cotton used in ASOS products must be sourced as one of our approved More Sustainable Cotton fibres, with Better Cotton as a minimum requirement, from Spring Summer 2026 onwards.

Polyester

Synthetic fibres such as polyester are traditionally made from crude oil, contributing to the depletion of this finite natural resource. Converting crude oil into finished fabrics require significant amounts of energy and the process creates biproducts that can contain harmful chemicals. Synthetic fabrics also contribute to microplastic pollution of rivers, lakes and oceans as small particles are released during washing and laundering.

While we have no minimum requirements for Polyester, we expect suppliers to actively engage with ASOS teams to increase the amount of recycled polyester they are using year on year.

MMCFs (Man-Made Cellulosic Fibres)

Man-Made Cellulosic Fibres (MMCFs) including viscose and lyocell are traditionally made using pulp from wood. There are significant risks associated with how this wood is sourced including deforestation and negative impacts on biodiversity and indigenous communities. In addition to the risks associated with raw material sourcing, the chemicals used in the pulping and processing of the wood into the fibre can pose a risk to workers health and safety as well as causing pollution through emissions and discharge of liquid waste.

As a result of these risks, ASOS requires that as a minimum:

- Suppliers must source all Man-Made Cellulosic fibres from producers rated as 'Green Shirt', as identified in the Canopy Hot Button Report. For more information see: [Hot Button Report | Canopy Planet](#).
- Suppliers must not source cellulosic fibres from the Xinjian Region.

Wood, Paper and Bamboo

ASOS buys a small amount of wood, paper and bamboo, primarily in our accessories products. As with Man-Made Cellulosic Fibres there are significant risks associated with how this wood is sourced including deforestation and negative impacts on biodiversity and indigenous communities.

As a result of these risks all wood, paper and bamboo contained in ASOS products must be FSC certified.



2.2 Animal Welfare

Context

The full ASOS Animal Derived Material Policy, and certificate requirements for suppliers can be found in our Sustainable Materials policy.

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 products sold through any of ASOS' websites. All animal materials used must be by-products of the meat industry.

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 lambss 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 anaesthetic, 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®](#).

Supplier 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.
- Come from animals reared, transported and slaughtered under industry best practice standards, based on the [Five Domains](#):
 1. Good nutrition.
 2. Good environment.
 3. Good health.
 4. Appropriate behaviour.
 5. Positive mental experience.



2.2 Animal Welfare continued

- **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 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.

Permitted Animal Derived Materials

The following materials can be used with some exceptions:

- Feathers & Down, Alpaca, Mohair:
 - ▲ Must be certified to Textile Exchange standards (Responsible Alpaca Standard, Responsible Down Standard, Responsible Mohair Standard).
- Cashmere:
 - ▲ Only cashmere certified to The Good Cashmere Standard is permitted.
- Leather & 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.
 - ▲ Leather or skin with hair or wool on are accepted from the above species only, including shearling/sheepskin.
 - ▲ Must not be obtained from aborted animals, juvenile animals, animals kept in confinement systems, wild-caught animals, exotic animals, or vulnerable and endangered species.
 - ▲ Must meet UK/EU deforestation regulations.
- Wool:
 - ▲ 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.
- Other Animal Hair:
 - ▲ 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.



2.2 Animal Welfare continued

- Animal Testing:
 - ▲ No product sold on ASOS.com should be tested on animals.
- Animal Imagery:
 - ▲ Must be sensitive to animal welfare issues.
 - ▲ Prohibited animals and materials must not be used for marketing, production, or communication purposes.

BEST PRACTICE: Ensure all animal-derived materials are ethically sourced as by-products of the meat industry, comply with the Five Domains, undergo rigorous testing and labelling, and meet ASOS's animal welfare and compliance standards.



2.3 Chemical Management

Context

ASOS aims to reduce environmental impact and eliminate the use of harmful chemicals to protect worker/consumer health and the environment. ASOS has developed a Restricted Substance List (RSL) to comply with legislative and regulatory requirements of global trading territories, including REACH and Proposition 65. ASOS commits to working with the supply chain, industry associations, and leaders to accelerate industry efforts towards safer, sustainable chemistry inputs, processes, and outputs.

Please use this link to the full, [ASOS Chemical Policy Restricted Substances List](#)

Definitions

- **RSL (Restricted Substance List):** Outlines the acceptable limits of potentially toxic or harmful substances which can be present in finished products.
- **ZDHC (Zero Discharge of Hazardous Chemicals):** An initiative that ASOS is a signatory of, requiring suppliers to share ZDHC requirements down the supply chain.
- **REACH:** A European Union regulation concerning the Registration, Evaluation, Authorisation, and Restriction of Chemicals.
- **Proposition 65:** A California law that requires businesses to provide warnings about significant exposures to chemicals that cause cancer, birth defects, or other reproductive harm.

Supplier Responsibilities

ASOS requires suppliers to ensure all products and packaging meet the limits set out in our RSL. To ensure compliant product, suppliers must:

- Communicate our RSL and ZDHC's MRS (Manufacturing Restricted Substance List) upstream to material, component and chemical suppliers.
- Source materials/components responsibly at development/order stage by requesting declarations, recognised certifications and/or test reports from your suppliers showing compliance to our RSL and ZDHC MRS.
- Map material/component sources to establish compliant sources.
- Test materials/components for high-risk chemicals and submit mandatory chemical testing to your technologist prior to Gold Seal Approval.
- Highlight any non-conformance with our RSL prior to starting production/delivery.
- Respond swiftly to ASOS' request to see evidence of compliance in cases of customer complaints or enforcement authority challenge.
- Follow ZDHC CMS (Chemical Management System) and TIG (Technical Industry Guide) to implement better chemical management practices.
- Suppliers who carry out wet processing are asked and encouraged to complete ZDHC Performance InCheck, Verified InCheck, Clear Stream reports, (including Supply to Zero certification level 1 & 2), to evaluate and monitor the chemicals used in production.



2.3 Chemical Management continued

- Suppliers who produce MMCF fabrics must follow and undertake the ZDHC MMCF module, please read (depending on the reporting year) the [ZDHC MMCF Guidelines V2.2](#) and [ZDHC MMCF Guidelines V3.0](#). Relevant stakeholders are to adopt and implement. Please read the [ZDHC MMCF Implementation V3.0](#) document.
- All suppliers on the ZDHC program, are to follow [ASOS ZDHC Standard Operating Procedure \(SOP\)](#). This can be found on the supplier Extranet.

Supplier Action on Chemical Failures

As soon as the brand/supplier becomes aware of any product that may not comply with the ASOS RSL they must notify ASOS immediately. Providing evidence of compliance and product information required. The brand/supplier must co-operate with all reasonable requests to provide such information as necessary to demonstrate evidence of testing and product compliance.

Dealing With Complaints and Enforcement Authority Challenges

In the event that:

- ASOS receives notice that it has resold a product supplied by you that does not comply with our RSL; or
- ASOS carries out testing on your product and determines a failure to comply with our RSL; or
- ASOS receives a complaint from our customer, we will take steps to immediately withdraw the Product from further sale.

ASOS Actions on Chemical Failures

ASOS will not accept products which fail to comply with our RSL and reserves the right to:

- Reject non-compliant products and require a replacement with compliant products.
- Require re-working of the products to comply with the ASOS RSL.
- Test and/or conduct a product recall.
- Cancel any undelivered order/s.
- Discount / price reduction of delivered orders.
- Apply service credits.
- Apply monetary deductions including but not limited to covering the cost of paying fines to an enforcement authority.
- Account for any lost profits incurred by ASOS including but not limited to as a result of a product recall and making goodwill payments.
- Destroy or safely dispose of products (at supplier's cost).
- Reject stock (supplier to arrange and pay for the cost of storage and collection).
- Recover associated costs from suppliers.



2.4 Metal contamination

Context & Risk

It is critical that all ASOS products are safe for handling and wearing, protecting both customers and employees from potential harm caused by metal contamination.

Definitions

- **Metal Contamination:** The presence of unwanted metal particles in products.
- **Service Credit:** A financial penalty issued against the supplier for non-compliance with the metal contamination requirements in this Code.

Supplier Responsibilities

- Demonstrate Prevention: Suppliers must demonstrate effective prevention of metal contamination in their products.
- Manage and Detect: Suppliers are fully responsible and accountable for the management and detection of metal contamination in all merchandise.
- Understand Procedures: Ensure that each procedure related to metal contamination prevention is understood and followed by all parties involved in the manufacture of the product.
- Cover Inspection Costs: In the event of metal contamination, suppliers must cover the cost of 100% inspection of the stock.
- Handle Returns and Destruction: Suppliers must handle the return or destruction of contaminated stock at their own cost if required.

ASOS Actions on Metal Contamination Failures

In the event of metal contamination found in any products, ASOS will take immediate action:

- The stock will be removed from sale by ASOS.
- The stock will be 100% inspected at the supplier's own cost. This may result in the stock being cancelled and returned to the supplier at the supplier's own cost or seized by governmental health and safety bodies. Depending on the contamination, the stock may not be returned to the supplier and may be destroyed.
- A service credit will be issued against the supplier. This is a tiered system dependent on the number of previous metal contamination offences:
 - ▲ 1st offence: £2,000.
 - ▲ 2nd offence: £5,000.
 - ▲ 3rd offence: Supplier disengagement.

Note on fines: All legal and safety fines will be invested in the ASOS Foundation. Fines are applied in addition to any costs incurred due to managing non-compliant stock.



2.5 Rejected Stock

Context

If there is an issue with stock meaning that ASOS is unable to sell it, ASOS has the right to reject the stock and require the Supplier to collect it. This may apply in cases such as:

- Legal/Corporate Responsibility Complaint: e.g., product infringes third-party intellectual property or is offensive.
- Customer Safety Issue: e.g., product causes harm/damage (including product recall).
- Faulty/Product Testing Failure: e.g., product fails safety tests or ASOS chemical requirements & RSL (See Section 2.3).
- Poor Quality/Incorrect/Unordered Stock: e.g., right item but wrong colour.

ASOS will notify the Supplier in writing, triggering the RSC process. The notification will include details of the rejection, such as SKUs, quantities, reasons for rejection, collection process, and reimbursement details. Suppliers must submit a collection request within 5 days and collect the stock within 28 days. Failure to collect the stock within the deadline will result in additional charges and escalation to senior management.

Definitions

- **SKUs (Stock Keeping Units):** Unique identifiers for each product or item in inventory.

Supplier Responsibilities

Rejection and Collection Process

1. Day 1 – Notification: The Supplier will be notified in writing by its Retail contact or another relevant ASOS team, triggering the RSC process. The notification will include details of the rejection, SKUs, quantities, reasons for rejection, collection process, and reimbursement details.
2. Day 2–6 – Collection Request: The Supplier must submit a collection request within 5 days of the notification. If multiple locations are involved, a collection request must be submitted for each. The Supplier will be provided with available booking slots and a collection reference number.
3. Day 28 – Final Collection Date: The Supplier must collect the stock within 28 days of notification, from each collection location, at the agreed booking slots. The collection reference number must be provided at each location.

Suppliers are fully responsible for the cost of logistics/transportation and any associated costs.

Failure to Collect Stock by the Deadline

ASOS will take failure to collect rejected stock within 28 days extremely seriously. If a Supplier doesn't collect within the 28-day period, the breach will be escalated to senior management. ASOS will be entitled to charge a handling/administration charge as well as weekly storage costs. ASOS reserves the right to rely on other contractual remedies, at the Supplier's cost.



2.6 Supply Chain Traceability (T4 & T5)

Context & Risk

Supply chain transparency and traceability enables ASOS to manage risks, undertake due diligence assessments, and comply with current and upcoming regulations. ASOS is committed to enhancing visibility and transparency within its supply chain to enable better management of risks and regulatory compliance.

Definitions

Tier	Definition	Example
Tier 1	Main production sites	Factory which cuts, sews, finishes ASOS own brand product and ships to ASOS
Tier 2	Process integral to production	Provider of one or more processes, e.g. stitching, cutting, packing, quality control, warehouses
Tier 3	Enhancements to product	Provider of one or more processes e.g. printing, dyeing, laundry, embroidery
Tier 4	Fabric and components	Fabric mills and their wet processors, tanneries, hardware and trims
Tier 5	Raw materials	Textile fibres, natural and manmade materials

Supplier Responsibilities

- Share Information: Provide Tier 4 fabric mills and Tier 5 spinners name, address, Country of Origin (COO), and contact information when requested by ASOS.
- Support Fabric Specification: Assist in the full completion of fabric specification visibility and provide physical samples when requested.
- Complete Assessments: Ensure the ASOS Mill Technical Assessment is completed by the Tier 4 source when requested. If you're a Supplier and would like more details on the scope of the ASOS Mill Technical Assessment, you can find a template on the Supplier Extranet.
- Provide Transparency: Be prepared to share fabric/yarn/trim source transparency and price information when requested by ASOS.
- Engage in Compliance Conversations: Engage in conversations with ASOS to ensure no release of hazardous chemicals within Tier 4 facilities and that mills are producing right first-time fabrics. Ensure compliance with local laws for Tier 4 and Tier 5 suppliers.
- Share Certifications: Provide required Tier 4 and Tier 5 fabric and yarn certifications for sustainable materials when requested by ASOS.



3.0

People

3.1 Child Labour Remediation and Young Workers Policy	30
3.2 Migrant Workers Policy	32
3.3 Homeworking Policy	36
3.4 Freedom of Association and Collective Bargaining Policy.....	38
3.5 Unapproved Sub-Contracting	40
3.6 Responsible Exit Policy	41
3.7 Timebound Remediation Policy.....	43
3.8 Gender Equality in the Supply Chain Policy	44
3.9 Anti-Slavery and Human Trafficking Policy	46



At ASOS, we are committed to upholding the highest standards of ethics, integrity, and respect for human rights across our operations and supply chain. The protections outlined in this Code of Conduct are applicable to all who come into contact with our operations, including employees, supply chain workers, third-party workers, customers, and local communities.

It is our responsibility to ensure that every worker in our supply chain is treated with dignity and their human rights are promoted, protected and respected. All suppliers must fully comply with this Code and uphold the highest standards of worker protection, adhering to all relevant laws and best practices. In cases of conflict or differing standards, the approach that offers the greatest protection for workers will always be followed. This Code of Conduct reflects our core values and outlines our expectations of suppliers to promote a culture of transparency and fairness, where workers' rights are at the forefront and embedded in everything we do.



3.1 Child Labour Remediation and Young Workers Policy

Context

ASOS has a zero tolerance policy for child labour within its supply chain. 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. Suppliers 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, suppliers contribute to the protection of children's rights, support their well-being, and uphold the ethical standards of the supply chain.

Definitions

- **Child(ren):** Anyone below 18 years old.
- **Child Worker:** Someone who has not reached their 15th birthday, or any higher age specified in local law for completing mandatory schooling or beginning of legal employment, thus not legally entitled to work.
- **Young Worker:** A young person who is legally entitled to work, i.e., above 15 or the minimum age of employment and below the age of 18.
- **Child Labour:** Any use of a Child Worker for work, including forced, indentured, or trafficked labour, or any exposure of a Young Worker to Hazardous Work.
- **Hazardous Work:** Any work likely to harm the health, safety, or morals of children, including working with chemicals, machinery, or electrics; in confined spaces; at height or in extreme temperatures; exposed to dust, fumes, or loud noise; lifting heavy loads; working overtime or at night.

Supplier Responsibilities

Prohibition of Child Labour:

- Child Workers must not be involved in the manufacture of goods for ASOS.
- Children must not be permitted in production areas at any time. This includes the Children of Workers who live in factory accommodation and Children brought to care facilities on site.
- Young Workers can be employed if adequate precautions are in place and they are not subjected to Hazardous Work.
- No Child Worker or Young Worker shall be employed through a labour agent in any part of the ASOS supply chain.
- Suppliers must have effective systems to verify the age of workers and maintain records of their documentation, including maintaining copies of any ID cards.
- Suppliers must ensure a qualified employee checks the validity of worker documentation, detailing their name, department, ID card number, date of birth, and date of joining.



3.1 Child Labour Remediation and Young Workers Policy continued

- If official documentation is unavailable, other methods must be used to verify age, and if not possible, the worker must not be employed.
- Suppliers must maintain a list of all employees and a separate list of Young Workers.
- Procedures must be in place to check the identity of all visitors to ensure no children are in production areas.

Obligations When Child Labour is Suspected/Identified:

- Inform ASOS immediately and conduct a full investigation.
- Explain legal requirements to the Child and guarantee re-hiring when they reach legal working age.
- Work with ASOS to create a remediation programme in the best interests of the Child.
- Discourage the Child from seeking alternative work and ensure their living conditions are secured.
- Provide the Child with legal minimum wage until they reach legal working age.
- Keep clear records of all steps taken and payments made.
- Improve internal procedures to prevent recurrence.
- Do not intimidate the Child or their family, remove or dismiss the Child without implementing the Code, send the Child anywhere without ASOS' consent, falsify records, pay any form of "settlement" or compensation to the Child or their family without ASOS' prior written consent.

Child Labour Remediation Programme:

- ASOS will work with suppliers and local NGOs to develop a solution in the best interests of the Child Worker.
- The programme will seek to meet the educational, social, and economic needs of the Child Worker.
- The Local NGO will contact the Child and their family, facilitate school enrolment, and monitor their performance.
- When a supplier is funding the remediation programme of a Child, the Local NGO will help facilitate the transfer of monthly compensation to the Child's family on a monthly basis. ASOS will debit the minimum wage compensation to the corresponding Supplier and provide additional payments on top of the local minimum wage.

Protecting Young Workers:

- Young Workers can be employed if adequate procedures are in place to safeguard them and they do not perform Hazardous Work.
- Formal work-based training or apprenticeship programs are supported if they meet local legal requirements. These programmes should be implemented for workers who lack necessary skills and knowledge, thus cannot be employed yet as regular workers and should not be used to undermine the local labour law requirements.
- Young Workers must be paid at least the local minimum wage.
- Suppliers must implement and maintain adequate management systems, verify the authenticity of employee ID cards, comply with local laws, and conduct risk assessments to protect Young Workers.
- If a Young Worker is found doing Hazardous Work, they must be removed immediately and employed in a safe environment without reduction in pay or benefits.



3.2 Migrant Workers Policy

Context

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. Suppliers 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.

Definitions

- **Bonded Labour:** Debt bondage where workers are forced to work for an employer to pay off recruitment fees or debts.
- **Destination Country/Territory:** The country/territory where the migrant worker will work.
- **Direct Employment/Directly Employed:** An arrangement where a worker is employed directly by the employer.
- **Discrimination:** Any form of unequal treatment not permitted by local law or this Code, including treatment based on race, caste, age, role, gender, gender identity, religion, country of origin, sexual orientation, marital status, pregnancy, dependents, disability, social class, union membership, or political views.
- **Employer:** A person or legal entity that provides work and remuneration and controls and directs workers.
- **Forced or Compulsory Labour:** Work or service exacted from any person under the menace of any penalty and for which the person has not offered voluntarily.
- **Indirect Employment/Indirectly Employed:** An arrangement where a worker is employed or managed by a recruitment agency or labour provider while working for a supplier.
- **Labour Provider:** An organisation that employs or manages workers on behalf of a supplier.
- **Migrant Worker(s):** A person who migrates from one territory or country to another to seek employment.
- **Recruitment Agency:** An organisation that arranges work or services for workers in return for a fee.
- **Recruitment Fee:** Fees or costs levied against a worker by a recruitment agency, often in the context of securing employment.
- **Sending Country/Territory:** The home country, territory, or region from which the worker has migrated.
- **Worker:** A person who provides work or services to a supplier, including migrant workers and contract workers.

Supplier Responsibilities

General Obligations:

- Ensure migrant workers are employed responsibly, not indebted to recruitment agencies, labour providers, or the supplier, receive adequate training, and their welfare and legal rights are protected.
- Apply employment standards outlined in this Code to migrant workers.
- Inform ASOS of all migrant workers used in the supply chain.
- Notify ASOS immediately of any breaches of this Code.



3.2 Migrant Workers Policy continued

- Monitor and inspect all sites where migrant workers are engaged or housed and inform ASOS of any offences under the UK Modern Slavery Act 2015 or this Code.
- Protect migrant workers after their employment ceases.
- Comply with migrant labour recruitment laws in both the destination country/territory and the home country of the migrant worker, applying the provision that grants the greater benefit.
- Ensure no discrimination against workers, including migrant workers, before, during, or after employment.
- Treat all workers equally and provide migrant workers with the same opportunities and employment conditions as other workers.

Right to Work:

- Ensure migrant workers have the legal right to work in the destination country/territory and obtain work permits. No migrant worker must be under 18.
- Be familiar with immigration requirements, including work permits.
- Keep records of the expiry dates of migrant workers' passports and temporary work permits/visas and ensure renewal before expiry.
- Support migrant workers in enrolling in obligatory state social security and taxation systems and help with setting up local bank accounts.

Recruitment Agents and Third-Party Labour Providers:

- Work only with established legal entities that do not engage in unethical practices. If a certification system exists, Suppliers must only use certified organisations.
- Limit the number of recruitment agencies or labour providers used and recruit workers directly wherever possible.
- Have written contracts with recruitment agencies/labour providers stipulating all fees and responsibilities, including a zero-tolerance approach to exploitation, forced, compulsory labour, or bonded labour.
- Do not engage migrant workers under 18 via recruitment agencies or labour providers.
- Communicate the standards in this Code to recruitment agencies/labour providers and ensure professional recruitment and employment practices are followed.

Recruitment Fees and Other Associated Costs:

- Cover all costs related to the recruitment of workers, ensuring no fees or deposits are charged to workers at any point during the recruitment process. These fees may include, but are not limited to:
 - ▲ Recruitment agent fees
 - ▲ Interview fees
 - ▲ Visa processing fees
 - ▲ Medical tests and vaccinations
 - ▲ Insurance costs
 - ▲ Skills and qualification tests
 - ▲ Training and orientation
 - ▲ Equipment costs



3.2 Migrant Workers Policy continued

- Outbound and return travel from/to departure port
- Reimburse workers immediately if any fees have been paid. At no point should any money be owed/ payments be overdue to Workers.
- Set up systems to pay recruitment agencies directly for migrant and contract workers' fees, travel costs, and other associated costs.

Supplier's Obligations to a Migrant Worker Prior to Engaging Them:

- Provide migrant workers with all relevant information relating to their work and accommodation before signing a contract and departing for the destination country/territory.
- Communicate terms of employment clearly in the migrant worker's native language or a language they understand.
- Ensure migrant workers understand they are not required to pay any recruitment fees or other sums to the supplier or any third party. Workers' Passports, ID papers must not be withheld under any circumstances.

Employment Documentation:

- Provide migrant workers with a written contract of employment and other employee materials in their native language or a language they understand.
- Ensure contracts are signed at least 7 days prior to departure for the destination country/territory.
- Employ migrant workers through direct employment contracts, even if recruited through a recruitment agency.
- Ensure contracts are legally enforceable in the destination country/territory.
- Ensure migrant workers retain and have access to their identity documentation at all times. Workers' Passports, ID papers must not be withheld under any circumstances.
- Employment documentation must be available to migrant workers at all times. This includes:
 - ▲ Contract of Employment
 - ▲ Payslips
 - ▲ Personnel files
 - ▲ Any additional working or living arrangements
- Provide lockable storage for workers to safely retain their papers.

Supplier's Obligations During a Migrant Worker's Employment
Personnel/ Employment Documentation:

- Organise personnel files for all workers and ensure they are available for review at all times.
- Ensure employment contracts include provisions for salary payment, reimbursement of unauthorised fees, accommodation details, transportation, health and safety provisions, working hours, overtime pay, weekly day off, and annual leave arrangements.
- Keep clear records of all hours worked and payments made to migrant and contract workers.



3.2 Migrant Workers Policy continued

Earnings:

- Pay all earnings directly to the worker, not through a third party.
- Prohibit forced saving schemes, deposits, and “runaway insurance”.

Freedom of Association and Right to Collective Bargaining:

- Ensure migrant workers have access to trade unions. Where this is not possible within the legal local context Supplier must not prohibit Workers from meeting/ organising.

Ensure migrant workers and are represented on worker committees, health and safety committees, and in all other workplace communications.

Freedom of Movement:

- Ensure migrant workers have the same freedoms as local workers, including the freedom to leave employment or seek work elsewhere.
- Do not withhold money or introduce restrictions that may limit this freedom.
- Guarantee migrant workers' freedom to return home at the end of their employment, clearly stipulated in their contracts.

Accommodation:

- Ensure accommodation used by migrant workers is safe and hygienic, and help migrant workers find suitable accommodation and access local healthcare facilities.

Obligations Post-Employment:

- Cover all costs associated with repatriation at the end of a migrant worker's contract.
- Cover repatriation costs in extenuating circumstances.
- Cover contract renewal costs.
- Provide reference letters for future work with the supplier before the worker leaves.
- Do not deter or prevent workers from freely terminating their agreements, including by levying “leaving fees” or deductions.

These may include, but not limited to:

- ▲ Withholding of wages and benefits, bonuses or allowances already earned including holiday pay;
- ▲ Early termination fine or deductions;
- ▲ Forfeiture of lawful deposits or saving accounts; and
- ▲ Withholding any severance payments owing.



3.3 Homeworking Policy

Context

Homeworkers are a vital part of the ASOS supply chain, providing specialist and craft-related skills essential for producing the fashion items ASOS customers love. However, homeworkers are often overlooked and employed informally, leaving them vulnerable to underpayment and job insecurity. Many homeworkers are women balancing paid work with domestic responsibilities, and homeworking provides a crucial income stream for their families. ASOS is committed to improving conditions for homeworkers, ensuring their employment is sustained and regular, and contributing to better rights, income, and working conditions through responsible purchasing practices.

Definitions

- **Home Work:** Work carried out by a person (homeworker) in their home or other premises of their choice, for remuneration, resulting in a product or service specified by the employer. This excludes persons with employee status who occasionally work from home.
- **Homeworker:** A person who performs home work as defined above.
- **Employer:** A person, natural or legal, who uses home work in their business activity, either directly or through an intermediary.

Supplier Responsibilities

Commitment to Homeworking:

- 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 with ASOS to identify and map where homeworking occurs in the supply chain and disclose this information.
- Manage and implement the standards set out in this policy for homeworkers.
- Develop an action plan with ASOS to improve labour conditions for homeworkers, involving homeworkers and/or their representatives.

Improving Labour Conditions:

- Keep up-to-date records of all homeworkers, including name, proof of age, and address.
- Develop systems to guarantee payments to homeworkers, such as passbooks and payslips.
- Provide training and information to homeworkers about their rights and entitlements and an accessible grievance mechanism.
- Enable enrolment in social security systems or equivalent private provisions.



3.3 Homeworking Policy continued

- Develop a work quota system to provide more regular work and deter subcontracting.
- Provide training and information to intermediaries on their responsibilities and entitlements.
- Provide access to key health and safety equipment, such as potable water and appropriate lighting.
- Provide direct employment for homeworkers where possible.

Use of Intermediaries:

- Establish transparency in the supply chain between the factory and the homeworker, understand all tiers of intermediaries, and disclose this information to ASOS.
- Ensure all intermediaries comply with applicable licencing or certification systems and national law.
- Establish a pre-qualification system for intermediaries involved in contracting work to homeworkers.
- Ensure factories establish contractual relationships with intermediaries.
- Provide training to intermediaries on their legal obligations and ASOS standards.
- Establish internal protocols for outsourcing work to homeworkers, including verification of pre-qualified intermediaries and tracking of pieces and payments.



3.4 Freedom of Association and Collective Bargaining Policy

Context & Risk

Ensuring the freedom of association and the right to collective bargaining is fundamental to the realisation of other labour rights. ASOS is committed to upholding these rights within its supply chain, in compliance with the International Labour Organisation's Conventions 87, 98, 135, and 154, and is therefore a signatory of the Global Framework Agreement with IndustriALL Global Union. Suppliers are required to implement and monitor compliance with these standards, guaranteeing workers' rights to organise and bargain collectively. ASOS will actively monitor adherence and take necessary actions in cases of non-compliance, including remediation plans, cancellation of orders, withholding payment, termination, suspension, or other legal actions as deemed necessary.

Definitions

- **Collective Bargaining Agreement:** Negotiations between an employer, a group of employers, or employers' organisations, and workers' organisations to determine working conditions, terms of employment, and relations between employers and workers.
- **Discrimination:** Any form of unequal treatment not permitted by local law or ASOS policies, including treatment based on race, caste, age, role, gender, gender identity, religion, country of origin, sexual orientation, marital status, pregnancy, dependents, disability, social class, union membership, political views, or work status (e.g., part-time, fixed term, agency workers).
- **Global Framework Agreement:** An agreement negotiated globally between trade unions and a multinational company to protect workers' interests across the company's operations.
- **Trade Union:** A workers' organisation constituted to further and defend the interests of workers.
- **Worker:** A person who provides work or services to a supplier.

Supplier Responsibilities

Attitude Towards Trade Unions:

- Adopt an open attitude towards the activities of trade unions.
- Guarantee the right of workers to join trade unions and bargain collectively.

Allow trade union representatives sufficient access to the workforce to communicate and consult on employment conditions.

Non-Interference:

- Do not interfere with trade union activities, organisers, or representatives.
- Ensure workers are free to join trade unions without victimisation, discrimination, intimidation, or abuse.
- Do not penalise workers for joining a trade union.



3.4 Freedom of Association and Collective Bargaining Policy continued

Protection Against Retaliation:

- Do not deter workers from joining trade unions through threats of violence, dismissal, denial of promotion, or earning opportunities.
- Do not dismiss workers because of their trade union membership or blacklist them to prevent employment elsewhere.

Compliance with Collective Bargaining Agreements:

- Comply with existing collective bargaining agreements at the industry level in the country of manufacture.
- Do not refuse to recognise and bargain with trade unions.
- Provide representatives access to appropriate information for meaningful bargaining.
- Do not use threats to transfer operations to unfairly inhibit workers' bargaining positions.

Alternative Means:

- Where freedom of association and collective bargaining rights are restricted by law, allow the development of parallel means for independent and free association and bargaining.

Communication and Monitoring:

- Provide agents and subcontractors involved in manufacturing ASOS products with a copy of this Code and monitor compliance.
- ASOS reserves the right to conduct routine, unannounced audits to monitor compliance.
- ASOS may initiate independent investigations upon receipt of complaints regarding the matters herein, including from workers, NGOs, and trade unions.



3.5 Unapproved Sub-Contracting

An important part of our commitment to operate ethically is being able to trust our suppliers, particularly in guaranteeing that ASOS products are only manufactured in locations preapproved by ASOS. This approval process ensures that employment and working conditions meet ASOS' required standards. Suppliers must understand the serious consequences they will face if unapproved sub-contracting is found within ASOS' supply chain. Transparency and early reporting of issues are encouraged and will be considered when enforcing these requirements.

If you're one of our Suppliers and would like more detail on this, please refer to our full Unapproved Subcontracting Policy which can be found on the Supplier Extranet.





3.6 Responsible Exit Policy

Context

ASOS strives for long-term relationships with our 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. Suppliers and factories are expected to support ASOS in these aims and commitments by working collaboratively during the exit process.

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.

Prior to Exiting – Internal Communications and Initial Risk Assessment

The relevant ASOS departments will conduct an impact assessment and will engage internally to try and address reasons for exiting and will collect information including, but not limited to, the below:

1. Factory details (including name, country of production, teams using the factory and the duration of the business relationship with the factory)
2. Reason for exiting.
3. Information on the history with the supplier including discussions on improvement plans.
4. The exiting order volume as a percentage of factory capacity (based on the previous 12 months of production) and whether this percentage has varied significantly in recent months.
5. The anticipated final order placement and final shipment dates for all goods manufactured in the factory.

Please note: when a decision to exit a factory is due to a high-risk rating, final warning letter, or Accord Article 21 escalation, there will be times when some of the above steps would have been performed already by ASOS. Where this occurs, ASOS will not repeat those steps as part of the responsible exit process.



3.6 Responsible Exit Policy continued

Exiting Factories – Communication with Suppliers and Ongoing Risk Assessment

Intention to exit factories will be communicated to the relevant contact at the supplier/factory and will be accompanied by a clear timeline for exiting the factory. Suppliers are required to share the exit timeline with all factories. ASOS will further engage with the suppliers/factories (including where possible, with the trade unions in the factories) regarding the impact of the withdrawal on workers and will assess the exit timeline accordingly, in order to allow the factory to alleviate any adverse impact on workers.

On occasions, unavoidable terminations of employment due to factory exit will be carried out. If this occurs, those terminations must be carried out by the employer/factory in accordance with local law and the Fair Labor Association's Retrenchment Guidance. The factory/employer must ensure that all wages, severance pay, and other benefits are paid to the workers according to local law and the Fair Labor Association's Retrenchment Guidance.

In these circumstances, the supplier/factory must:

1. Provide, at the earliest possible opportunity, written notice to the workers of the possibility of employment termination and the reasons, therefore.
2. Consult with worker(s) and their representatives before a final decision to dismiss is taken.
3. Ensure that all possible alternatives to employment termination are explored and that workers who are to be dismissed are treated fairly as per ACT guidance..
4. Ensure that worker(s) whose employment will be terminated are selected objectively.
5. Allow worker(s) whose employment will be terminated time off during the notice period to apply for other jobs.

All suppliers should keep detailed records showing how and when the above actions were taken. ASOS reserves the right to request copies of such records for verification purposes which the supplier/factory shall promptly provide to ASOS.

Immediately After Exiting – Assessing Adverse Impact on Workers

Our Global Framework Agreement with IndustriALL Global Union have been central to our approach to human rights and ethical trade since 2017.

Where negative impacts to workers as a consequence of a factory exit are brought to the attention of ASOS or IndustriALL, and/or ACT, ASOS will engage with and/or IndustriALL in a process of mediation and where applicable agree on remediation. We expect suppliers and factories to take any action necessary to support with the remediation process; this can include but not limited to worker consultation regarding any dismissal and ensuring workers are paid their dues.



3.7 Timebound Remediation Policy

Context

ASOS is committed to supporting and working with our suppliers to ensure that our factories respect and protect workers in line with local and international human rights laws and the requirements in this Code. Our audit program helps us understand the performance of a factory against these standards and provides guidance on areas of strength and areas needing improvement. While we manage remediation in a practical and realistic manner, we expect factories to work with us to improve or remediate issues found during audits effectively and promptly. From March 2020, ASOS has implemented a Timebound Remediation escalation process for Tier 1, Tier 2, and Tier 3 factories to meet our human rights due diligence obligations and ensure suppliers' commitment to respecting and protecting workers.

If you're one of our Suppliers and would like more details on our factory auditing procedures, please refer to our full Factory Auditing Policy which can be found on the Supplier Extranet.

Definitions

- **Timebound Remediation:** An escalation process to ensure timely improvement in factory conditions following audits.
- **Red Critical:** A grading given to a manufacturing unit following an audit indicating severe non-compliance.
- **Limit on Business:** Restrictions placed on a supplier, including no year-over-year business growth, no new departments linked to the factory/supplier, no new suppliers linked to the manufacturing site, and no new development with the manufacturing site.
- **Responsible Exit:** A process to exit a factory in a manner that reduces negative impacts on workers and the long-term viability of the site.

Supplier Responsibilities

Preparation:

- Check the factory list and audit grading.
- Ensure the Ethical Trade team has received updates or evidence on any outstanding non-conformances.

Remediation Process:

- *If a manufacturing unit is graded Red Critical following an audit, ASOS will place an immediate limit on business growth.*
- *If no improvement is made within 3 months following a follow-up visit, ASOS will start a responsible exit process.*
- *If a manufacturing unit is graded Red, a follow-up will be conducted within 6 months. If the unit shows improvements, it will be audited again within 3 months. If no improvement is shown, ASOS will start a responsible exit process.*

Communication and Compliance:

- Communicate with ASOS regarding any questions or updates.
- Work collaboratively with ASOS to ensure compliance with the Timebound Remediation process and support the responsible exit process if necessary.



3.8 Gender Equality in the Supply Chain Policy

Context

ASOS is committed to preventing gender-based discrimination and promoting gender equality within its supply chain. Traditional gender norms can lead to human rights violations such as violence against women, sexual harassment, gender pay gaps, and lack of employment security. These issues particularly affect women, who are more likely to be employed in non-standard forms of employment. Women constitute a significant portion of the workforce in the garment industry, including ASOS' supply chain. Addressing discrimination and promoting gender equality is a matter of human rights and ethical business practices. Despite formal non-discrimination provisions in local laws, women continue to face various forms of discrimination due to patriarchal power structures, social norms, and gender stereotypes.

ASOS commits to integrating a three step framework for promoting gender equality in the Supply Chain as recommended by the United Nations' Working Group on Business and Human Rights and in order to do this working with women's human rights defenders and civil society organisations to support our suppliers to ensure that implementation of this Policy, actions taken and remedy being provided will be transformative towards gender equality and empowering for women.

Definitions

- **Gender:** Socially constructed roles and power relations among men, women, and gender nonbinary persons.
- **Violence and Harassment in the World of Work:** A range of unacceptable acts, omissions, or behaviours that result in physical, psychological, sexual, or economic harm or suffering, including threats of such acts.
- **Gender-Based Violence and Harassment:** Violence and harassment directed at persons because of their sex or gender or affecting persons of a particular sex or gender disproportionately.
- **Sexual Harassment:** Any unwelcome conduct of a sexual nature that causes offense or humiliation, interferes with work, is made a condition of employment, or creates an intimidating, hostile, or offensive work environment.
- **Discrimination:** Any form of unequal treatment not permitted by local law or ASOS policies, including treatment based on race, caste, age, role, gender, gender identity, religion, country of origin, sexual orientation, marital status, pregnancy, dependents, disability, social class, union membership, political views, or work status.
- **Worker:** A person who provides any form of work or service to a supplier.
- **Homeworker:** A worker who performs a stage of manufacturing, assembly, or packaging in their home or other premises of their choice.
- **Supplier:** An organisation that manufactures or procures goods or services, including agents and sub-contractors.

Supplier Responsibilities

Promoting Gender Equality:

- Develop an open approach to eliminating gender-based discrimination and promoting gender equality in the workplace.
- Provide all data requested by ASOS related to the gender dimension of work, including employment, promotion, and payments.
- Collaborate with ASOS to support the establishment of gender-sensitive grievance and remedy mechanisms.



3.8 Gender Equality in the Supply Chain Policy continued

Preventing Discrimination:

- Do not permit discrimination in any form, including discrimination based on gender, sexual orientation, gender identity, marital status.
- Develop policies and procedures to prevent discrimination in recruitment, wages, benefits, promotion, training, transfer, termination, and retirement.
- Do not implement irrelevant health checks, including pregnancy tests, during recruitment or at any time during employment.
- Provide the same or similar job positions with no wage reduction for women after maternity leave.

Supporting Workers:

- Protect workers from bullying, verbal or physical harassment, victimisation, discrimination, or physical abuse in the workplace.
- Disseminate this Code to women working in the supply chain in accessible language and format provided by ASOS.



3.9 Anti-Slavery and Human Trafficking Policy

Introduction

The ASOS Anti-Slavery and Human Trafficking Policy (“Policy”) is mandatory for all personnel who are working for or on behalf of ASOS, including employees, suppliers (of ASOS branded goods for resale and goods not for resale), agents, contractors, and any other business partners in the ASOS value chain.

Modern slavery is a violation of fundamental human rights and involves the exploitation of people for personal or commercial gains. It can include forced labour, bonded labour, human trafficking, child slavery, and servitude. ASOS is committed to preventing modern slavery within its value chain and ensuring compliance with the International Labour Organisation’s Conventions 29 and 182.

Definitions

Modern Slavery is an umbrella term which covers different contemporary forms of slavery, including, but not limited to:

Forced labour- all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.

Human trafficking - involves transporting, recruiting or harbouring people for the purpose of exploitation, using violence, threats or coercion to achieve control over the person.

Debt bondage or bonded labour - the world’s most widespread form of slavery, where debt is used as a mechanism of control over a person and then to force people to work to pay off that debt. People borrow money they cannot repay, are forced to work off the debt and lose control over the conditions of both their employment and the debt.

Child slavery - is the enforced exploitation of a child for someone else’s gain, meaning the child will have no way to leave the situation or person exploiting them. It can include child trafficking, see below, and children in debt bondage.

Child trafficking - child trafficking is the recruitment, transportation, transfer, harbouring or receipt of any person under the age of 18 years of age, for the purpose of exploitation. Children are defined as trafficked even if there has been no violence, deception or coercion .

Responsibility and Commitment to the Policy

ASOS recognises and continuously assesses the level of risk of modern slavery across all areas of its supply chain and is committed to identifying and addressing salient risks through ongoing due diligence, risk assessments, and proactive mitigation measures. We recognise our responsibility to uphold ethical business practices and implement policies and processes that protect workers from abuse and exploitation in all aspects of our operations and partnerships.

This policy applies to all individuals across our value chain, including those employed directly by ASOS and those engaged indirectly through third parties. Everyone shares an equal responsibility for preventing, identifying, and reporting any breaches of this policy.

Policy Requirements

- **Freedom of Employment:** All workers have the right to enter and leave employment voluntarily, without any physical or monetary threats or barriers. Workers must not be subjected to any form of coercion or forced to remain in their jobs against their will.
- **Freedom of Movement:** Ensure workers are not coerced or physically confined to the workplace or provided accommodation. Workers must have the freedom to move and leave their place of work or accommodation without restrictions. This includes ensuring workers always retain control of their personal identification documents.



3.9 Anti-Slavery and Human Trafficking Policy continued

- Child labour: Suppliers and their subcontractors may not employ anyone below 15 years of age, or the local legal minimum age, or the age for completing compulsory education, whichever of the three is higher. Please see Section 3.1 for further information.

Remediation

ASOS requires a remediation plan to be implemented whenever Modern Slavery is identified and is committed to collaborating with suppliers to develop tailored, case-specific plans based on root cause analysis. We investigate all allegations, support corrective actions, and work with relevant authorities to ensure victims receive appropriate care and support. Where suppliers demonstrate little or no commitment to remediation, ASOS may enforce its Timebound Remediation Policy.

In line with the UN Guiding Principles, remediation may include apologies, restitution, rehabilitation, financial or non-financial compensation, sanctions, and preventative measures. ASOS remains committed to supporting suppliers throughout the entire remediation process.

Policy breaches and consequences

We monitor compliance and should a supplier or related third-party be found to have breached this policy we may take action including remediation plans, order cancellations, payment withholding, suspension, or contract termination. If a non-compliance is found or remediation cannot be demonstrated we will investigate, which could include reporting the breach to the relevant authorities.

While ASOS aims to work collaboratively with suppliers and encourages transparency, we reserve the right to end relationships where serious breaches occur and there is no commitment to remediation within a reasonable timeframe, in line with our Responsible Exit Policy.

Suppliers must ensure that any private agencies or subcontractors they engage with have effective due diligence processes to prevent modern slavery and human trafficking (see Appendix B for details).

Training and Communication

ASOS will provide this policy to all employees and suppliers as part of the on-boarding process. It is imperative that everyone confirms they have read, understood and will comply with this policy, suppliers must also ensure that this policy is shared with their value chain and associated parties.

Reporting Suspicions

At ASOS, we are fully committed to supporting anyone who raises concerns in good faith under this policy, even if those concerns are ultimately unfounded. We ensure that no individual will face any negative consequences for refusing to participate in, or for reporting, suspected modern slavery or human trafficking practices. Please report any suspicions immediately using one of the following methods. Your voice is vital in our fight against exploitation.

Topic	Key Contact
ASOS Human Rights Team	ASOSethicaltrade@asos.com
ASOS' whistleblowing hotline	SPOT
If there is concern that an individual is in immediate danger, then the relevant emergency authorities in your local areas should be contacted immediately.	



4.0

4.1 Compliance with Laws and Regulations	49
4.2 Training.....	49
4.3 Anti-Bribery and Corruption	50
4.4 Anti-Money Laundering	52
4.5 Sanctions	54
4.6 Transparency and Ethics (Col and Whistleblowing)	56
4.7 Fraud	58
4.8 Data Protection.....	60
4.9 Artificial Intelligence (AI)	62
4.10 Cyber Security	64

Business Ethics and Compliance



4.1 Compliance with Laws and Regulations

Context

Suppliers 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:

- Suppliers 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 supplier 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 supplier must meet the more stringent standard.

4.2 Training

Supplier Responsibilities

The Supplier shall implement a training program for its workers to ensure they understand and comply with the requirements of this Code. The Supplier 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

Suppliers 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 suppliers' compliance with Anti-Bribery and Corruption legal requirements and policies.

Supplier Responsibilities

Compliance with Laws:

- Suppliers 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:

- Suppliers 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.



4.3 Anti-Bribery and Corruption continued

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

- Suppliers 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:

- Suppliers 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.

Reporting and Whistleblowing:

- Suppliers 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 suppliers' compliance with Anti-Bribery and Corruption legal requirements and policies.
- Suppliers must maintain accurate records of all transactions and be prepared to provide evidence of compliance when requested.



4.4 Anti-Money Laundering

Context

Suppliers 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. Suppliers 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.

Supplier Responsibilities

Compliance with Laws

Suppliers 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. Suppliers are responsible for staying updated on changes to relevant laws and regulations and must take proactive measures to ensure ongoing compliance.

Risk Management

Suppliers 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, suppliers, 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.

Transaction Monitoring

Suppliers 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.



4.4 Anti-Money Laundering continued

Record Keeping

Suppliers 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, suppliers must provide relevant authorities with access to these records to support compliance investigations and audits.

Training and Awareness

Suppliers 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

Suppliers 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. Suppliers must enforce strict accountability measures, ensuring individuals responsible for non-compliance face appropriate disciplinary actions.



4.5 Sanctions

Context

Suppliers 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. Suppliers 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.

Supplier Responsibilities

Compliance with Laws

Suppliers 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. Suppliers are responsible for staying informed about relevant sanctions laws and ensuring their business practices align with these legal requirements.

Screening and Monitoring

Suppliers must implement robust screening and monitoring processes to ensure compliance with international sanctions regulations. This includes screening all business partners, suppliers, 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. Suppliers should maintain accurate records of their screening activities and be prepared to provide evidence of their compliance upon request.

Prohibited Activities

Suppliers 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. Suppliers must exercise due diligence to ensure they do not indirectly support or facilitate transactions that would violate ASOS's commitment to sanctions compliance.



4.5 Sanctions continued

Reporting and Accountability

Suppliers 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

Suppliers 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. Suppliers must take proactive steps to keep their employees informed about regulatory changes and best practices.

Third-Party Compliance

Suppliers 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. Suppliers are expected to take corrective action if any third party is found to be in breach of sanctions regulations.

Record Keeping

Suppliers 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

Suppliers 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.

Supplier Responsibilities

Ethical Business Practices

Suppliers 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

Suppliers 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 supplier must not attempt to unduly influence ASOS employees through gifts, hospitality, or favours.

Reporting Concerns and Whistleblowing

Suppliers should actively encourage employees to report any concerns regarding wrongdoing, unethical behaviour, or violations of this Code. Employees of the supplier 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. Suppliers 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.



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

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. Suppliers must cooperate fully with any audits or investigations relating to ethical conduct and compliance with ASOS standards.

Training and Awareness

Suppliers 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

Suppliers 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.

Supplier Responsibilities

Compliance with Laws

Suppliers 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

Suppliers are required to implement robust measures to prevent, detect, and respond to fraud. This includes maintaining effective internal controls, conducting regular audits, and performing risk assessments to mitigate potentially fraudulent activities. Any suspicious activity must be promptly investigated and reported in accordance with applicable laws and contractual obligations.

Ethical Conduct

ASOS expects suppliers to always conduct business ethically and with integrity. Suppliers 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.

Transparency

Suppliers 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.



4.7 Fraud continued

Training and Awareness

Suppliers 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. Suppliers must ensure that their workforce understands their responsibilities in upholding ethical standards.

Third-Party Management

Suppliers 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. Suppliers 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

Suppliers 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.

Supplier Responsibilities

Compliance with Data Protection Laws

Suppliers 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

Suppliers 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, along with remediation plans to address vulnerabilities.

Data Minimisation

Suppliers 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.

Transparency

Suppliers 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 suppliers to uphold these principles by maintaining open communication and ensuring that individuals understand how their data is handled.



4.8 Data Protection continued

Individual Rights

Suppliers 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

Suppliers are required to implement robust procedures to detect, report, and investigate data breaches. In the event of a breach, suppliers must promptly notify affected individuals, ASOS, and relevant authorities as required by law. For the avoidance of doubt, suppliers must notify ASOS immediately and no later than 24 hours of the data breach to 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

Suppliers 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. Suppliers remain responsible for the actions of their third-party partners.

Training and Awareness

Suppliers 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

Suppliers 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.

Supplier Responsibilities

Compliance with Laws

Suppliers 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. Suppliers 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. Suppliers 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.

Bias and Fairness

AI systems must be designed and maintained to be free from bias and discrimination. Suppliers 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.



4.9 Artificial Intelligence (AI) continued

Transparency

Suppliers 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

Suppliers 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

Suppliers 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

Suppliers 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

Suppliers 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.

Supplier Responsibilities

Compliance with Laws and Regulations

Suppliers 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

Suppliers 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. Suppliers must cooperate fully with customers, regulators, and authorities to ensure an effective response and minimise harm.

Access Control

Suppliers 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

Suppliers 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

Suppliers 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.



5.1 Certifying Compliance and Audit	67
5.2 Self-Monitoring and Reporting Breaches	67
5.3 Breach, Remediation and Termination	67
5.4 Updating this Document	68

5.0

Complying with this Code



5.1 Certifying Compliance and Audit

The Supplier 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 Supplier 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 Supplier'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 Supplier is responsible for monitoring its compliance with the Code and must report any breaches, whether actual or suspected, to ASOS.Compliance@ASOS.com as soon as possible. Additionally, the Supplier 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 Supplier or its workers, ASOS may choose to either:

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

If the Supplier 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 Supplier, including any contracts. ASOS may, at its discretion, provide the Supplier with support and resources to assist with remediation. ASOS may also suspend the business relationship with the Supplier while remediation efforts are ongoing.

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 Supplier, including any contracts; or
- b. require the Supplier to address the incident (or incidents) with the Representative.

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

ASOS may, at its discretion, provide the Supplier and Representative with support and resources to assist with remediation. Additionally, ASOS may suspend the business 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
Environmental Management	Sustainability@asos.com
Waste Management	Sustainability@asos.com
Sustainable Materials	FabricTeam@asos.com
Animal Welfare & Derived Materials	FabricTeam@asos.com
Chemical Management	ChemicalManagement@asos.com
Traceability	FabricTeam@asos.com
Human Rights	EthicalTrade@asos.com
Factory Auditing	EthicalTrade@asos.com
Compliance Matters	ASOS.Compliance@asos.com
Business Ethics	ASOS.Compliance@asos.com
Fraud	ASOS.Compliance@asos.com
Cyber Security & Data Protection	DatapProtection@v.com



6.2 Appendix B – Requirements Overview Table

Topic	Minimum	Ambition	Prohibited
Supply chain	<ul style="list-style-type: none"> ● Keep ASOS informed of which factory is producing product in line with subcontracting policy. ● Be willing to provide transparency on supply chain and risks to stakeholders including ASOS. 	<ul style="list-style-type: none"> ● Have full visibility of Tier 4 and 5 supply chain . 	<ul style="list-style-type: none"> ● Products and services must not be conducted in sanctioned territories. ● Production in factories not authorised by ASOS.
Human Rights	<ul style="list-style-type: none"> ● Monitor supply chain and implement policies and procedures, which identify, address and prevent human rights risks and remediate these when necessary. ● Access to facilities/ documents/ workers during audits/ investigations initiated by ASOS or a third party to be shared with ASOS. 		<ul style="list-style-type: none"> ● Denying auditors' or ASOS representatives' access to factory production floor and facilities – including but limited to dormitories, lunch halls, and childcare facilities.
Modern Slavery, forced labour & Child labour	<ul style="list-style-type: none"> ● Immediately notify ASOS should a Supplier become aware of any forced labour, so appropriate next steps can be taken by ASOS. ● Promptly provide all documentation required by ASOS and the applicable customs authority to release any products detained by such customs authority due to forced labour suspicion. ● Take proactive measures to prevent child labour. ● Implement ASOS Child Labour Remediation Programme in case any child labour identified. 		<ul style="list-style-type: none"> ● ASOS condemns and prohibits all forms of modern slavery. ● Suppliers must ensure that no products sold or offered for sale to ASOS are linked in any way to any forced labour. ● ASOS has a zero-tolerance policy for child labour within its supply chains.



6.2 Appendix B – Requirements Overview Table continued

Topic	Minimum	Ambition	Prohibited
Freedom of association & collective bargaining	<ul style="list-style-type: none"> Do not intervene in workers' freedom of association and right to collective bargaining 		<ul style="list-style-type: none"> Any discrimination against union members, including but not limited to dismissals, threats, blacklisting, unfair disciplinary actions etc.
No discrimination, harassment or abuse	<ul style="list-style-type: none"> Ensure that discrimination against any supply chain workers is prevented. 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. 		<ul style="list-style-type: none"> ASOS does not tolerate harassment, physical, sexual, psychological or verbal abuse, or corporal punishment perpetrated against supply chain workers. Disciplinary deductions from pay must not be tolerated.



6.2 Appendix B – Requirements Overview Table continued

Topic	Minimum	Ambition	Prohibited
Wages, benefits & working hours	<ul style="list-style-type: none"> ● Pay workers 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. ● Ensure that workers are not obliged to work excessive working hours and paid at least legal overtime pay for any overtime work. ● 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 this Code of Conduct. 		<ul style="list-style-type: none"> ● Working hours must comply with national laws and collective agreements, and should not exceed 48 hours per week, excluding overtime. ● Overtime shall be voluntary, compensated at a premium rate and not be requested on a regular basis.
Safe working environment	<ul style="list-style-type: none"> ● Provide a safe and hygienic working environment for all employees. 		
Environmental Impact	<ul style="list-style-type: none"> ● Legally compliant with up to date permits and authorisations. ● Promptly disclose any environmental non-compliances to ASOS. ● Possess an effective Environmental Management System (EMS). ● Have plans in place to remediate risks when necessary, prioritising the most significant adverse impacts. 	<ul style="list-style-type: none"> ● Engage leadership and workers in formulation and implementation of EMS. ● Level 3 FEM across energy, water, waste, chemicals. ● Implement a greenhouse gas reduction Science Based Target or one consistent with SBTi 1.5C pathway. 	<ul style="list-style-type: none"> ● Authorisations non-compliant or out of date. ● >2 environmental fines in 2 years. ● Non-disclosure of environmental violations. ● No plan to remove coal by 2028. ● No renewable electricity (part or all) by 2027.



6.2 Appendix B – Requirements Overview Table continued

Topic	Minimum	Ambition	Prohibited
Environmental Impact continued	<ul style="list-style-type: none"> ● Complete the Higg FEM with targets and action plan to reduce greenhouse gas (GHG) emissions. For small volume suppliers complete the Higg FDM. ● Achieve Higg FEM Level 2 across energy, water, waste, chemicals. ● Adoption of renewable electricity, whole or part by 2027. ● Plan for coal elimination in Tier 4 by 2028. ● Use of sustainably certified wood biomass in high risk regions. ● Waste disposal at licensed and audited sites. ● Waste disposed of in an efficient, safe and environmentally responsible way, in line with the waste hierarchy and in full compliance with applicable laws. ● Reduce, reuse and recycle products and materials as much as possible to reduce waste in their business operations. ● Track water consumption by source. ● Identify if located in area of high or very high water stress. ● In areas of high water stress, carry out a water balance; have reduction targets and a water efficiency plan. ● Identify if in an area of high flood risk and mitigate risk. 	<ul style="list-style-type: none"> ● Source 100% of energy needs from renewable sources, preferably all electric. ● 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. ● Use textile waste in circular systems. ● >90% diversion of waste from incineration or landfill. ● Take proactive measures to mitigate water risks, ensuring responsible water use while preserving community resources. ● Investment in low water consumption processes in water stressed areas. ● Rainwater harvesting in water stressed areas. ● Ensuring water availability for local communities in high water stress areas. ● ZDHC Progressive or Aspirational standards. ● Waste water recycling using e.g. reverse osmosis in water stressed areas. 	<ul style="list-style-type: none"> ● No energy efficiency or GHG reduction plan. ● No Environmental Management System. ● No FEM or FDM. ● Open burning or dumping waste on-site. ● Waste disposal at unlicensed sites. ● Unlicensed or over-the-limit water abstraction. ● Discharge of untreated effluent to surface water or to land. ● Lack of waste water sampling and analysis for wet processors of >15m³ / day effluent. ● Uncontrolled release of toxic VOCs.



6.2 Appendix B – Requirements Overview Table continued

Topic	Minimum	Ambition	Prohibited
Environmental Impact continued	<ul style="list-style-type: none">● Effective ETP with back-up plan.● Compliance with ZDHC guidelines.● Inventory of air emissions including source and identity.● Action plan for minimization of air pollution.		



6.2 Appendix B – Requirements Overview Table continued

Topic	Minimum	Ambition	Prohibited
Chemical Compliance	<ul style="list-style-type: none"> Suppliers 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"). MRSL, including testing and reporting. SDSs, emergency response plans and training. Maintain a Chemical Inventory List. Action plan to improve chemical management. 		<ul style="list-style-type: none"> Products manufactured using substances listed above the threshold on the ASOS CPRSL Chemical policy restricted substances list, will not be accepted.
Animal Welfare	<ul style="list-style-type: none"> 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 suppliers. 		<ul style="list-style-type: none"> No product sold on ASOS should be tested on animals. Not come from animals slaughtered specifically to produce fashion or beauty products. Not come from vulnerable, endangered, exotic or wild caught species. No Silk. No Angora & other rabbit hair. No Bone, Horn, Coral, Pearl, Shell (including Mother Of Pearl) or Teeth.



6.2 Appendix B – Requirements Overview Table continued

Topic	Minimum	Ambition	Prohibited
Materials	<ul style="list-style-type: none"> All Cotton used in ASOS products must be sourced as one of our approved More Sustainable Cotton fibres, with Better Cotton as a minimum requirement, from Spring Summer 2026 onwards. All Man-Made Cellulosic fibres must be sourced from producers rated as 'Green Shirt', as identified in the Canopy Hot Button Report. All Wood, Paper and Bamboo used in ASOS products must be FSC certified. Be able to provide required certifications for all more sustainable materials used in ASOS product, as specified in the Sustainable Materials Policy. 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. 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 indicated on the product care label and what description. 	<ul style="list-style-type: none"> Actively engage with ASOS teams to increase the amount of more sustainable materials they are using year on year. Focusing first on our 3 key fibre categories; Cotton, Polyester and Man-Made Cellulosic Fibres. Obtain certification at manufacturer level for standards listed in the Sustainable Materials Policy e.g. GRS or GOTS. 	<ul style="list-style-type: none"> ASOS does not permit the sourcing of cotton or other materials from Xinjiang (China), Turkmenistan, or Uzbekistan or other prohibited regions. Materials should not come from: <ul style="list-style-type: none"> animals slaughtered specifically for fashion or beauty products. vulnerable, endangered, exotic, or wild-caught species. 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. Down feathers from swans are not allowed. Feather or down from greylag geese are banned. Recycled cashmere can be used if certified to GRS or RCS but cannot be blended with un-certified cashmere. 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.



6.2 Appendix B – Requirements Overview Table continued

Topic	Minimum	Ambition	Prohibited
Materials continued	<ul style="list-style-type: none"> ● Feathers & 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. ● Cashmere must be certified by The Good Cashmere Standard. The brand must be pre-approved to sell cashmere at ASOS. ● 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. ● Animal Hair must not be obtained from vulnerable or endangered species or harvested by live plucking. Synthetic alternatives must be clearly labelled as synthetic. 		<ul style="list-style-type: none"> ● Merino wool must not be sourced from farmers who practice mulesing. ● Animal hair must not be used in makeup or shaving brushes.



6.2 Appendix B – Requirements Overview Table continued

Topic	Minimum	Ambition	Prohibited
Business Ethics and compliance	<ul style="list-style-type: none"> 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. 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. 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. Disclose any situations where their personal or financial interests could potentially conflict with their obligations to ASOS. 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 (FCPA). 		<ul style="list-style-type: none"> Business partners must not, directly or indirectly, offer, give, receive, or solicit bribes or any improper advantages in any form. ASOS has a strict no-retaliation policy and will not tolerate any retaliation against individuals who report violations in good faith. 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. No employee should face harassment, discrimination, or disciplinary action for reporting misconduct in good faith. Excessive or irrelevant data collection must be avoided to ensure compliance with data protection principles and to minimize risks associated with unnecessary data retention.



6.2 Appendix B – Requirements Overview Table continued

Topic	Minimum	Ambition	Prohibited
Business Ethics and compliance	<ul style="list-style-type: none"> Maintain accurate records of all transactions and be prepared to provide evidence of compliance when requested. 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. 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. 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. Fully comply with all applicable sanctions laws and regulations in the 		



6.2 Appendix B – Requirements Overview Table continued

Topic	Minimum	Ambition	Prohibited
Business Ethics and compliance continued	<p>United Kingdom and in any other jurisdictions where they operate.</p> <ul style="list-style-type: none"> ● Exercise due diligence to ensure they do not indirectly support or facilitate transactions that would violate ASOS's commitment to sanctions compliance. ● Actively encourage employees to report any concerns regarding wrongdoing, unethical behavior, 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. ● Provide clear and accessible channels for reporting concerns, such as a dedicated email address, hotline, or anonymous reporting tool. ● 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. ● Comply with all relevant data protection laws, including the UK and European General Data Protection Regulation (GDPR) and any applicable local regulations. This includes 		



6.2 Appendix B – Requirements Overview Table continued

Topic	Minimum	Ambition	Prohibited
Business Ethics and compliance continued	<p>ensuring the lawful processing of personal data in accordance with legal requirements and industry best practices.</p> <ul style="list-style-type: none"> ● Comply with all applicable cybersecurity laws, regulations, and industry standards relevant to their operations and services. ● Proactively monitor changes in regulatory requirements and industry best practices to ensure continuous adherence. 		