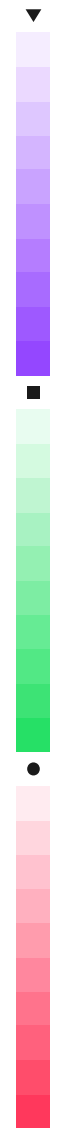


Fashion with Integrity: Strategy update

asos



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FOREWORD

José Antonio Ramos, CEO, ASOS

Fashion never stands still. Whether social media trends, the latest looks from the catwalk, innovations in design, manufacturing, and production, or just the flow of goods from supplier to retailer to customer – and, in future, back into circulation – fashion is always on the move.

As creators and curators of the best fashion for 20-somethings around the world, it's our job as ASOS to keep on top of these movements so we can continue to serve our customers, while also meeting our wider commitments to society and the environment.

Much like fashion, the field of sustainability is constantly shifting, too. This year marks three years since we refreshed our Fashion with Integrity (FWI) programme in 2021, building on the work we'd completed since we first launched Fashion with Integrity over a decade ago.

In those three years, we've seen a dramatic shift in both our external and internal operating context.

Externally, new sustainability legislation, driven by the EU but also underway in the US, our home market of the UK, and further afield, will require a fundamental shift in how all businesses address a wide range of issues across sustainability and human rights. New reporting regulations and due diligence obligations will require additional disclosures and transparency. And new best practice, constantly being developed and implemented, must also be considered.

Internally, we've seen our own understanding and expertise in this area continue to develop as we work to implement and refine our FWI programme and collaborate with our peers and colleagues in the industry.

Continued...



“Fashion with Integrity is something that all of us at ASOS are proud of and passionate about.”

FOREWORD

In the last few years, we've also introduced a wide range of changes within the ASOS business. We have a new leadership team and structure across ASOS, including the Management Committee, a new sustainability governance structure, and new membership within our Board-level Sustainability Committee. We've also refreshed our internal culture and established a new commercial model, transforming the way we operate with a new focus on efficiency and speed-to-market, helping reduce the amount of stock we have left over at the end of the season.

Taking all this into consideration, it's clear that now is the right time for us to revisit our approach to FWI and reassess our targets, goals, and metrics for the future. This is evolution, not revolution: we're keeping what works and making improvements where needed. It's important to stress that this will be an ongoing and continual process, as we adapt our strategy to meet our evolving needs and requirements.

To support the development of our new strategy we've updated our materiality assessment to validate that our approach continues to address the most relevant topics for the business. We've also simplified how we talk about FWI and our pillars for ease of understanding and reporting. Finally, from this year, we'll also be aligning

Delivering on our FWI targets is core to the future success of our business.

our FWI reporting timelines with our annual financial reporting.

Delivering on our FWI targets is core to the future success of our business. FWI is something that all of us at ASOS are proud of and passionate about, and I'm very pleased to share our updated strategy on behalf of the business.

José

José Antonio Ramos
CEO



MATERIALITY ASSESSMENT

To support the development of our new strategy, this year we've updated our materiality assessment, working with an expert third-party provider.

For this assessment, we've focused on impact materiality, reviewing where our business practices and operations have an impact on the economy, environment, and society, both directly and throughout our value chain, and rating these impacts based on their significance. By doing so, we can ensure that the targets we've set under our FWI strategy are aligned to our most significant impacts.

The assessment gathered insight from a wide range of sources, including desk-based research, stakeholder interviews, and insights from our finance, legal, and risk teams. It also incorporated findings from our climate scenario analysis completed in 2022 and our human rights salience risk review completed in 2023 to inform the development of our human rights strategy.

Topics for assessment were selected based on European Sustainability Reporting Standards (ESRS) guidelines. While the ESRS does not currently apply to ASOS, it is expected to do so in the coming years via the Corporate Sustainability Reporting Directive (CSRD). Using these guidelines to set our topics will therefore aid future comparisons.

It's important to note that ESRS guidelines also require a business to conduct a double materiality assessment. This means looking at both impact materiality (as we have done here), but also impact on ASOS from a financial, legal, and reputational risk perspective. We will therefore complete a double materiality assessment in the years ahead, using this impact assessment as our starting point.



MATERIALITY ASSESSMENT

Our impact materiality assessment clearly groups our topics into three areas

1

Priority areas

These are our most significant topics and areas where we currently contribute to negative outcomes overall, despite some contribution to positive outcomes. These are also our priority areas for reporting on our activities to mitigate impacts.

2

Areas to manage

These are broadly governance topics which are important for ASOS to continue to manage appropriately, to ensure that controls and processes prevent negative outcomes.

3

Opportunities

These are areas where we are currently contributing to positive outcomes or could do so in the future.

MATERIALITY ASSESSMENT

Priority areas

| Topic | Definition | Significance |
|--|--|--------------|
| Climate change | How an organisation manages impacts on climate change associated with GHG emissions and how it responds to the risks caused by climate change. | Critical |
| Biodiversity | How an organisation manages impacts on biodiversity and ecosystems relating to the prevention, management, and remediation of damage. | Significant |
| Equal treatment and opportunities in the supply chain | How an organisation manages impacts associated with equal treatment and opportunities in the supply chain, relating to the diversity and inclusion of workers, measures against gender-based violence and harassment, and equal pay and training. Includes consideration to the diversity of brand partners. | Significant |
| Resource use and waste (i.e. materials and packaging) | How an organisation manages impacts associated with the type and quantity of resources used across its supply chain own operations, and at end of life for packaging and products. | Significant |
| Pollution | How an organisation manages impacts on the pollution of air, water, and soil, with specific consideration to substances of concern (i.e. toxic chemicals), and microplastics. | Significant |
| Working conditions and work-related rights in the supply chain | How an organisation manages impacts on working conditions and work-related rights in the supply chain (including product manufacture and workers not directly employed by ASOS or third-party logistics providers, i.e. delivery drivers), including child labour, forced labour, adequate wages, health and safety, and freedom of association. | Significant |
| Water | How an organisation manages water-related impacts associated with water withdrawals, consumption, and discharges. | Significant |



MATERIALITY ASSESSMENT

| Topic | Definition | Significance |
|--|---|--------------|
| Data security and privacy | How an organisation manages impacts on data security and privacy relating to key stakeholders (incl. customers, employees, and suppliers). | Important |
| Safety and quality of products | How an organisation manages impacts by ensuring the safety and quality of its products for use by customers. | Important |
| Access to quality information | How an organisation manages information-related impacts by providing access to high quality information (i.e. by avoiding greenwashing). | Important |
| Business conduct and supply chain management | How an organisation manages impacts through its business conduct by meeting legal and regulatory requirements and through the management of its supply chain (covering own brands and partner brands) via procurement practices, due diligence, and engagement. | Important |

Areas to manage



MATERIALITY ASSESSMENT

| Topic | Definition | Significance |
|---|---|--------------|
| Community rights and engagement | How an organisation manages impacts on wider community rights (beyond its immediate supply chain), including the rights of vulnerable and/or marginalised people (i.e. women and the LGBTQ+ community), as well as socio-economic contribution. | Medium |
| DEI in our own workforce | How an organisation manages impacts on diversity, equity, and inclusion in its own workforce (incl. office and warehouse workers), relating to equal opportunities for all, diverse representation of workers, and the promotion of an inclusive culture. | Medium |
| Employment practices in our own workforce | How an organisation manages impacts on workers in its own workforce (incl. office and warehouse workers) relating to working conditions and rights, talent recruitment and retention, training and skills development, adequate wages, and health and safety. | Medium |

Opportunities



OUR STRATEGIC PILLARS

Our Strategic Pillars

We've simplified how we talk about FWI and restructured our pillars to make them easier to understand.

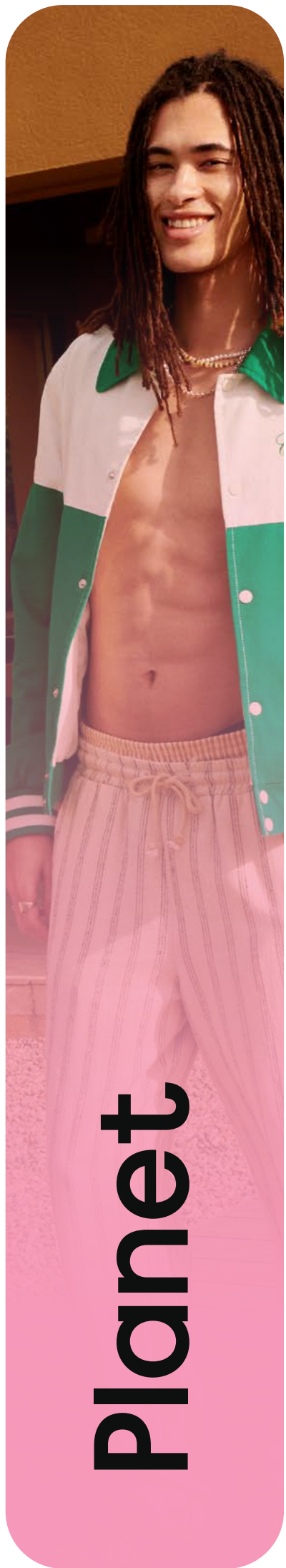


What's the difference between a target and a commitment?

We've set a mixture of targets and commitments against each of our FWI pillars. Where relevant, we've set measurable, data-led targets, backed by clear methodologies and operational roadmaps to help us achieve our aims.

It's not always appropriate to set data-led targets, for example when considering progress on human rights. When that's the case, we've set clear commitments instead. As with our targets, these commitments are supported by operational plans and interim objectives which we'll be using to measure and report against our progress.

OUR STRATEGIC PILLARS | PLANET



Focus area

What's included

Our targets and commitments

Jump to section

Climate & Nature

- Greenhouse gas emissions and reduction targets
- Climate-related risks and opportunities
- Nature-related risks and opportunities
- Biodiversity
- Water

- **Target:** By FY27, procure 100% renewable electricity across the ASOS estate.
- **Target:** By FY30, reduce the absolute emissions generated by the manufacture of ASOS own brand products by 42% compared to a FY22 baseline.
- **Target:** By FY30, ensure 90% of emissions generated by brand partner products sold on ASOS come from brands who have set science-based targets.
- **Target:** By FY50, reduce 90% of the absolute emissions generated by our entire value chain compared to a FY22 baseline.

A detailed definition of each of our targets and commitments is available in the appendix.

OUR STRATEGIC PILLARS | PRODUCT



Jump to section

| Focus area | What's included | Our targets and commitments |
|---------------------|--|---|
| Raw materials | <ul style="list-style-type: none">Material choice in products and packaging | <ul style="list-style-type: none">Commitment: Increase our use of more sustainable materials¹ in our ASOS own brand clothing products. Each year, we'll set a target for the proportion of our overall material use that we'd like to be more sustainable, and report back on our progress. |
| Design & Production | <ul style="list-style-type: none">Circular design strategyProduction processesSupply chain waste | <ul style="list-style-type: none">Commitment: Test and introduce innovative packaging materials and solutions, reducing overall usage where appropriate. By FY26, we'll increase recycled content in mailing and garment bags to a minimum of 95%. |
| Use & Recovery | <ul style="list-style-type: none">Takeback schemesCircular business models, i.e. rental and resale | <ul style="list-style-type: none">Commitment: Train the manufacturers of our ASOS own brand clothing products on our ASOS Circular Design Strategies. By FY27, we'll have launched a phased training programme prioritising suppliers based on their level of business with ASOS. |

A detailed definition of each of our targets and commitments is available in the appendix.

¹Defined as a material that has a lower environmental impact on average at raw material production stage than the conventional form of that material. A full list of currently accepted 'more sustainable' materials is on page 54.

OUR STRATEGIC PILLARS | PEOPLE



| Focus area | What's included | Our targets and commitments |
|--------------|--|---|
| Human Rights | <ul style="list-style-type: none">● Modern Slavery & Forced Labour● Gender empowerment● Freedom of Association and the Right to Collective Bargaining● Wages and benefits● Logistics and warehousing | <ul style="list-style-type: none">● Commitment: Implement our human rights strategy to enhance the human rights of workers across our value chain, focused on four key areas:<ul style="list-style-type: none">○ Forced Labour (Modern Slavery)○ Freedom of Association○ Wages & Benefits○ Gender Empowerment● Commitment: Maintain and build our foundation of effective own brand and partner brand due diligence. By FY27, we'll review and enhance current due diligence mechanisms, and introduce a global grievance channel structure with the aim of maximum accessibility, transparency, confidentiality, and enhanced remedy for workers |

A detailed definition of each of our targets and commitments is available in the appendix.

Jump to section

OUR STRATEGIC PILLARS | PEOPLE

Jump to section

Focus area

What's included

Our targets and commitments

Diversity, Equity, & Inclusion

- Supporting underrepresented communities
 - Empowering our customers through inclusion and representation
 - Working towards greater diversity, equity, and inclusion within ASOS
- **Commitment:** Implement our diversity, equity, & inclusion strategy for customers and communities, to drive a safer society for women, girls, and LGBTQIA+ communities; create fairer economic opportunity for global majority¹ creatives; and ensure an inclusive product offering for customers with disabilities and neurodiversity. By FY27, we'll:
 - Establish new charitable partnerships delivering change for those of marginalised gender identities and sexual orientations.
 - Develop plan and process to support and grow our network of global majority-owned brand partners, including scaling our annual incubator programme.
 - Launch the first ASOS Design adaptive collection.
 - **Target:** By FY30, achieve 50% female and 15% ethnically diverse² representation across our combined leadership team.

A detailed definition of each of our targets and commitments is available in the appendix.

¹ Global majority is used to refer to all ethnic groups except white British and all other white groups, including white minorities.
² Ethnically diverse refers to people who belong to a black, Asian, mixed, or other ethnic group, as defined by the UK Government's 2021 Census.



Planet

Climate & Nature

Overview

Our Planet pillar, and its Climate & Nature focus area, encompasses the work we're doing – and will do in future – to reduce the impact that our operations and value chain have on the environment and on natural ecosystems.

The urgency of addressing climate change and its impacts on nature and people has never been clearer. We're witnessing the tangible effects of climate change through extreme weather events, rising sea levels, and diminishing biodiversity. These changes not only threaten the ecosystems we rely on but also pose risks to our supply chain, operations, the people who work in them, and long-term business sustainability.

We're increasingly aware of the need to map the interfaces between ASOS and biodiversity, ecosystem integrity, and water, and deepen our understanding of the impacts and dependencies

realised between these areas.

We're committed to taking meaningful action to address these challenges. Climate & Nature serves as our roadmap for alignment with global climate goals, regulatory requirements, and stakeholder expectations.

To support our Climate targets, we updated our decarbonisation strategy, working with an external carbon accounting partner. Our next steps will be to consider and reflect the Transition Plan Taskforce's (TPT) recommendations before we publish our Climate Transition Plan. The UK Government is consulting on guidance for UK companies that will help them disclose transition plans in line with TPT recommendations. We will publish our transition plan following the publication of this guidance to ensure alignment.

[See overview](#)


Our FY22 baseline

| | FY22 emissions baseline (restated) | Previously reported FY22 |
|---|--|-----------------------------|
| Scope and Category | tCO2e | |
| Scope 1 - Fugitive emissions | 557 | N/A |
| Scope 1 - Natural gas | 3,608 | 3,351 |
| Scope 2 - Electricity – market-based | 2,232 | 2,860 |
| Scope 2 - Electricity – location-based | 10,096 | 11,497 |
| Scope 3.1a Purchased goods for resale (products and packaging) ¹ | 1,224,272 | 913,108 |
| ASOS own brands | 548,438 | 332,757 |
| Partner brands | 675,834 | 580,351 |
| Scope 3.1b Purchased goods and services not for resale | 101,963 | 23,015 |
| Scope 3.2 Capital goods | 52,598 | 53,780 |
| Scope 3.3 Energy-related activities not in Scopes 1 and 2 | 4,863 | 3,608 |
| Scope 3.4 Upstream transportation and distribution | 422,036 | 349,979 |
| Scope 3.5 Waste (operations) | 12,757 | 519 |
| Scope 3.6 Business travel | 1,383 | 1,535 |
| Scope 3.7 Employee commuting | 2,367 | 9,869 |
| Scope 3.8 Upstream leased assets | 25 | N/A |
| Scope 3.11 Use of sold products | 130,639 | 349,125 |
| Scope 3.12 End-of-life of sold products | 63,138 | 27,958 |
| Total | 2,022,438 | 1,738,708 |

¹Scope 3.1a emissions rely on material usage calculations, based on a series of documented estimates and assumptions, such as material weight and composition. We have conducted sensitivity analysis on these and consider them not to be material. For more detail, head to page 55.

²<https://unfccc.int/process-and-meetings/the-paris-agreement>

Climate

Our materiality assessment ranked climate change as our most significant topic, highlighting the importance of reducing our contribution to climate change by tackling our emissions.

In 2021, we achieved Science Based Targets initiative (SBTi) validation for emissions reduction targets set across Scopes 1, 2, and 3. In line with guidance at the time, these were intensity-based, meaning our emissions reduction targets and performance were calculated proportionally to either financial or operational metrics.

Following the introduction of these targets, the SBTi released the first iteration of its Corporate Net Zero Standard. This set new target-setting criteria for net zero, with a focus on absolute emissions reductions, excluding the use of carbon offsetting or removals until a 90% reduction in absolute emissions has been secured.

We’ve therefore reviewed our approach and set new near-term and long-term absolute emissions reduction targets, in line with the

latest best practice. The updates to our carbon reduction targets have been developed using the Paris-aligned 1.5-degree emissions pathway scenarios.²

To develop our climate targets, we worked with a new carbon accounting partner to update our carbon accounting methodology (using better quality emissions factors) and support our updated decarbonisation plan.

In line with our internal recalculation and rebase policy, we have updated our baseline year to FY22, due to significant changes in our carbon accounting methodology. FY22 is the earliest year for which we have access to sufficient data to enable a full recalculation. We have restated our FY22 emissions (left) and also provided our previously reported emissions for FY22 for comparison purposes.

OUR STRATEGIC PILLARS | PLANET | CLIMATE & NATURE

Nature

Although we're at the beginning of our nature journey, we understand the importance of integrating nature-related risks and opportunities into our business practices.

While we have much to learn and implement, we're committed to better understanding our impacts and dependencies on nature. Reporting against the Taskforce for Nature-related Financial Disclosures (TNFD) is currently voluntary, but we'll look to align our efforts in this space with its recommendations, and that of the LEAP framework.



OUR STRATEGIC PILLARS | PLANET | CLIMATE & NATURE

Our Targets & Commitments

A detailed definition of each of our targets and commitments is available in the appendix.

► Target: By FY27, procure 100% renewable electricity across the ASOS estate

This target means increasing our procurement of renewable electricity to cover 100% of electricity consumption across our direct operations: our offices and fulfilment centres.

We monitor our energy consumption via our Energy Management System (MyEnergy), which enables us to measure the impact of energy saving initiatives and ensure we're improving energy efficiency across our direct operations. As part of Energy Savings Opportunity Scheme (ESOS) Phase 3 requirements, we've recently conducted energy and carbon audits

across sites under our direct operational control¹ in the UK and EU. We'll be developing an action plan, in line with UK Government's Environment Agency requirements, to implement identified energy and carbon savings initiatives.²



¹See definition on page 51.

²<https://www.gov.uk/government/publications/comply-with-the-energy-savings-opportunity-scheme-esos/complying-with-the-energy-savings-opportunity-scheme-esos#esos-action-plan>

OUR STRATEGIC PILLARS | PLANET | CLIMATE & NATURE

Our Targets & Commitments

A detailed definition of each of our targets and commitments is available in the appendix.



► Target: By FY30, reduce absolute emissions generated by the manufacture of ASOS own brand products by 42% compared to a FY22 baseline¹

Almost all our emissions come from Scope 3. Within this, emissions generated by the manufacture of ASOS own brand products accounted for 27% of Scope 3 emissions and 27% of our overall emissions profile in our baseline year.

This target is aligned to the Paris Agreement's 1.5 degrees pathway and SBTi guidance. It requires us to work with our suppliers to identify and implement emissions reduction activities. Progress will be measured using the Higg Facility Environmental Module (FEM), through which suppliers report their energy sources to ASOS.

In the first instance, activity will focus on our Tier 1 (manufacturing) suppliers. However, we're continuing to map our fabric mills and fabric wet processing units further down our supply chain, adding to our existing mapping. Doing this will help us identify opportunities to drive improvements in energy usage to help meet our carbon reduction targets, for example removal of on-site use of coal and adoption of renewable energy. It will also support our wider due diligence efforts (detailed on page 42) and support the implementation

of our chemical strategy and ZDHC roadmap. This aims to eliminate hazardous chemicals in all the wet processing units within our supply chain – in line with our commitment to reduce our impact on nature.

Adoption of renewable energy includes the substitution of coal by biomass and the sourcing of electricity from renewable sources, either through direct generation (on-site solar panels, for example), Power Purchase Agreements, or Energy Attribution Certificates. We'll encourage our suppliers to move to sources of renewable electricity that better contribute to increased renewable capacity across the grid, such as on-site generation rather than through certificates, although we do accept use of these.

Achieving this reduction will also require the increased adoption of more sustainable raw materials in product manufacture. These are defined as materials with a lower environmental impact on average at raw material production stage than the conventional form of that material (head to page 29 for more).

¹Calculating performance against this target relies on material usage calculations, which are based on a series of documented estimates and assumptions, such as material weight and composition. We have conducted sensitivity analysis on these and consider them not to be material. For more detail, head to page 55.

OUR STRATEGIC PILLARS | PLANET | CLIMATE & NATURE

Our Targets & Commitments

A detailed definition of each of our targets and commitments is available in the appendix.

► Target: By FY30, ensure 90% of emissions generated by brand partner products sold on ASOS come from brands that have set science-based targets

We define partner brand products as those we sell on ASOS through our wholesale, Partner Fulfils, Marketplace, and ASOS Fulfilment Services models. Emissions generated by the manufacture of partner brand products sold on our platform accounted for 34% of Scope 3 emissions and 33% of our overall emissions profile in our baseline year (FY22).

Peer engagement and knowledge sharing is vital for us to reduce our impact. By engaging with our partner brands, which represent c.60% of our sales, we can work together to influence industry-wide decarbonisation. We can also support smaller brands by building their knowledge and capacity to align to a 1.5-degrees trajectory. We want to work with brands who take responsibility for their environmental impact and who are committed to working to tackle climate change.

In 2021, we set ourselves a goal of 66% of partner brand emissions (by volume) to come from brands who have set science-based targets by the end of our FY25. We achieved this goal a year early in FY24. As a result we've enhanced our ambition level to 90%, with

a new FY30 target date.

To deliver this target, we'll continue to build on our existing branded engagement programme, and have joined the FASHION LEAP FOR CLIMATE programme. This is an industry-led initiative to drive climate education, engagement, and action in the fashion industry. It means that eligible strategic brand partners of ASOS, together with brand partners of About You, Yoox Net-A-Porter, and Zalando, will be invited to join the Fashion LEAP for Climate Learning platform at no cost. The platform covers: measuring greenhouse gas emissions; setting targets that align with climate science; and submitting these targets to the Science Based Targets initiative.

We'll continue to share best practice across all brand partners and use our influence as a multi-brand platform to educate – and learn from – others, including through our FWI Learning Hub and a refreshed and updated partner brands code of conduct incorporating due diligence requirements.

OUR STRATEGIC PILLARS | PLANET | CLIMATE & NATURE

Our Targets & Commitments

A detailed definition of each of our targets and commitments is available in the appendix.

► Target: By FY50, reduce 90% of the absolute emissions generated by our entire value chain compared to a FY22 baseline

This long-term target builds on the actions and progress we'll make as part of our near-term FY30 targets. In line with the SBTi Net Zero Standard, we commit to reducing our absolute emissions by 90% from our FY22 baseline, excluding the use of carbon offsets or removals until FY50, at which time we'll neutralise the residual carbon (<10%).¹

We've set this target to ensure alignment with the Paris Agreement's 1.5-degree emissions pathway scenarios and to ensure we remain on this emissions reduction trajectory across our entire value chain, including those categories of emissions not covered in our near-term targets. Reducing our emissions in this way will reduce our contribution to climate change.

To achieve net zero, we'll engage and collaborate with industry peers to drive the necessary innovation to support the decarbonisation of our shared supply chains and ensure the fashion and apparel industry successfully transitions towards a low-carbon economy. We'll work with our inbound and outbound logistics partners to ensure we're working towards the same emissions trajectories.

Looking beyond our FY30 targets, our operational plans for 2030 to 2050 will require further supply chain improvements including the continued uptake of renewable energy by our suppliers and mills, and the decarbonisation of thermal processes, for example the replacement of fossil fuels by biomass or by electricity generated from renewable sources. These plans will be developed further as part of our Climate Transition Plan (see page 16 for more).

¹We're aware of the ongoing consultations on amendments to the Net Zero Standard, in line with the SBTi Standard Operating Procedure. We'll monitor and respond to these changes, including guidance and best practice around the use of offsetting or environmental attribute certificates (EACs), but will remain committed to science-based decarbonisation.

OUR STRATEGIC PILLARS | PLANET | CLIMATE & NATURE

Next Steps

As we're updating our carbon targets to include absolute reduction targets and an SBTi-aligned net zero target, we'll need to update our previous SBTi-validated intensity targets. We aim to get our updated near- and long-term carbon reduction targets submitted and validated by SBTi by our next update. This timing may be impacted by current wait times for SBTi validation.

In addition to setting emissions reduction targets, we must also monitor and manage the climate risks we face as we transition to a low-carbon economy. For more detail on our climate-related risks and opportunities, please refer to our latest TCFD disclosure in our Annual Report.



Product



Overview

Through our Product pillar, we want to make designing circular and more sustainable products business as usual, supporting us to create positive change across a product’s lifetime.

The Ellen MacArthur Foundation, a non-profit accelerating the transition to a circular economy, defines the circular economy as an alternative to our linear “take-make-waste” system, based on three principles: eliminate waste and pollution, circulate products and materials (at their highest value), and regenerate nature.^{1,2}

According to the Ellen MacArthur Foundation, a circular system:

- **Eliminates waste and pollution** by reducing the volume of products and materials that end up in landfills or incinerators, leading to a decline in greenhouse gas emissions associated with these forms of waste management

See overview

- **Circulates products and materials** by keeping them in use for as long as possible, through care, repair, reuse, and recycling, and in the case of biodegradable materials, composting. This circulation of products reduces the need to use virgin raw materials
- **Regenerates nature** by using farming and design practices that rebuild soil and enhance biodiversity

The shift to a circular economy is an essential tool in tackling climate change, biodiversity loss, and pollution, and therefore contributes to our goals under our Climate & Nature pillar. It’s vital for every business to play its role in facilitating the system change required to address the environmental and social impacts of our current ways of using resources and developing products.

¹<https://www.ellenmacarthurfoundation.org/fashion-and-the-circular-economy-deep-dive>

²<https://www.ellenmacarthurfoundation.org/the-circular-economy-in-detail-deep-dive>

OUR STRATEGIC PILLARS | PRODUCT

Our Circularity Framework

We've developed a circularity framework to guide our Product pillar and support our teams to implement circularity. Our circularity framework was informed by a comprehensive review of existing frameworks, including the Ellen MacArthur Foundation's vision of a circular economy for fashion, where we design products to be used more, made to be made again, and made from safe and recycled or renewable inputs.¹ It also reflects the Textiles 2030 Circular Design Toolkit, which outlines a new set of terminology to support brands to adopt the Ellen MacArthur Foundation's vision of a circular economy for fashion, with a specific focus on circular design.²

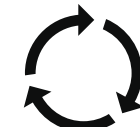
Our circularity framework is split into three subcategories, represented in our framework diagram: Raw Materials; Design & Production; and Use & Recovery. These form the focus areas of our Product pillar.



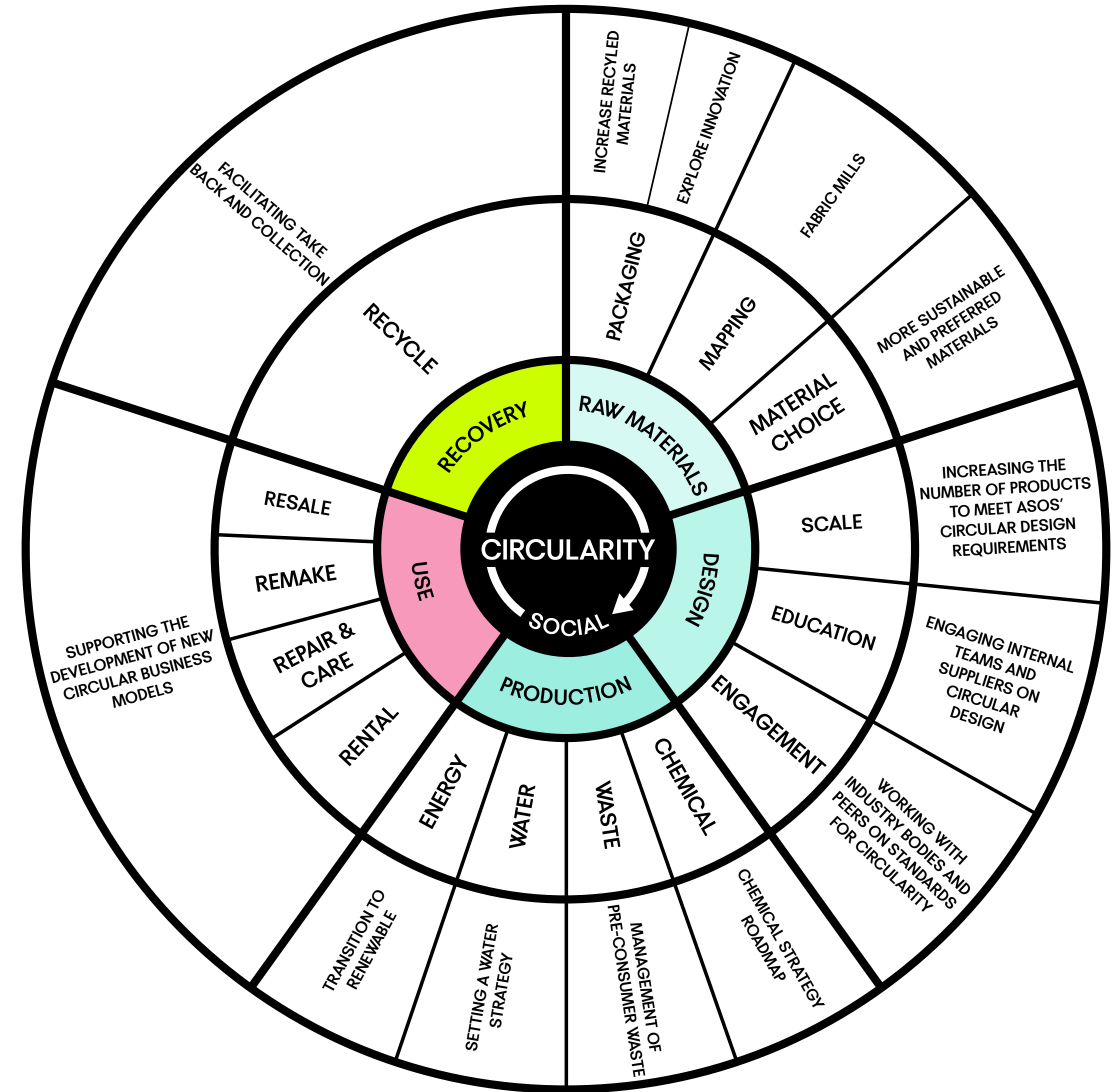
Raw Materials: our approach to material use and selection for products and packaging.



Design & Production: our approach to scaling circular design best practice and minimising processing impacts across our supply chain.



Use & Recovery: our approach to product longevity, circular business models (e.g., repair, rental, remake, resale) and recycling.



¹<https://www.ellenmacarthurfoundation.org/our-vision-of-a-circular-economy-for-fashion>

²<https://wrap.org.uk/resources/guide/circular-design-toolkit>

Our Circularity Framework

Circularity and a Just Transition

While our Product pillar focuses on environmental impact, our circularity framework holds social sustainability at its centre, acknowledging the need for a just and fair transition across our supply chain. A just and fair transition would see a shift to a circular system where our employees, suppliers, customers, and other stakeholders are supported, to ensure that the economic benefits of circularity are shared equally. Our People pillar guides our work on human rights and due diligence.



Raw Materials

Overview

Our Raw Materials focus area covers our approach to material use and selection for products and packaging.

Raw materials are a key component of sustainability and circularity, as they influence our contribution to resource extraction, determine our ability to circulate materials at their highest value, and are a key part of our approach to carbon reduction and reducing our water impact as part of our Climate & Nature pillar.

We've been working to increase our use of more sustainable materials in our ASOS own brand products. Alongside mandatory training on sustainable materials, we've set our buying teams

internal seasonal targets to increase their use of more sustainable materials.

We've also collaborated with the Centre for Sustainable Fashion (CSF), a University of the Arts (UAL) research centre based at London College of Fashion, since 2018.

Through our partnership, we've delivered in-person educational workshops and online training, which have supported our product teams to make more informed material decisions. Our most recent training collaboration with CSF saw over 300 members of our product teams complete our more sustainable materials training.

Through the development and release of our circular design collections, we've created products made from recycled and renewable materials. The collections provide a testbed for the use of these preferred raw materials, enabling us to trial the development of products using these materials internally and with our suppliers.

Our Targets & Commitments

- **Commitment: Increase our use of more sustainable materials in our ASOS own brand clothing products.**
Each year, we'll set a target for the proportion of the materials in our products that we'd like to be more sustainable, and report back on our progress.¹

A detailed definition of each of our targets and commitments is available in the appendix.

A significant portion of a product's environmental impacts occur in the production of the raw materials it contains. Switching to more sustainable raw materials is also core to reducing our emissions. Increasing our uptake of more sustainable materials is therefore an essential part of our Planet pillar, as well as Product.

We'll focus our efforts initially on switching our three most-used materials (by weight) – cotton, polyester, and viscose – to more sustainable alternatives. We'll continue to explore ways to switch our less-used materials, like nylon and acrylic, to more sustainable alternatives where possible.

We'll measure our progress by calculating the percentage, by weight, of raw materials used in our ASOS own brand clothing products that are approved by ASOS as a more sustainable material. This is defined as a material that has a lower environmental impact on average at raw material production stage than the conventional form of that material. A full list of currently permitted more sustainable materials is provided on page 54.

At the end of each year, we'll set out our target for our use of more sustainable materials in our products over the year ahead, and report back on our progress against the previous year's target. We're committed to increasing our use of more sustainable materials year-on-year, while recognising the uncertainty around the availability of these materials in the market several years in the future.

As part of increasing our use of more sustainable materials, we'll continue to use "preferred" more sustainable materials within our circular design collections. These materials meet our circularity requirements (i.e. made from recycled, renewable, or regenerative fibres), have the lowest carbon impact, or have the lowest water impact (when compared to other alternatives on the market).²

¹Calculating performance against this target relies on several documented estimates and assumptions, including product weight and composition. We have conducted sensitivity analysis on these estimates and assumptions and consider them not to be materially sensitive. For more detail, head to page 55.

²https://asos-12954-s3.s3.eu-west-2.amazonaws.com/files/1917/2121/9938/ASOS_Circular_Design_Collection_Policy.pdf

Our Targets & Commitments

A detailed definition of each of our targets and commitments is available in the appendix.

- **Commitment: Test and introduce innovative packaging materials and solutions, reducing overall usage where appropriate. By FY26, we'll increase recycled content in mailing and garment bags to a minimum of 95%.**

We continue to work to increase our use of recycled materials in our packaging.

Our mailing bags currently contain at least 80% post-consumer recycled material, and our garment bags (for ASOS own brands) contain at least 90% post-consumer recycled material. Our aim is to increase this to 95% for both bags by the end of FY26.

We want to support the introduction of more efficient and sustainable materials to help reduce overall packaging usage. We'll continue to test and trial new packaging materials, for example reusable and paper mailing bags, both of which we've tested internally for ASOS staff orders. These tests are helping us plan for potential legislative changes, such as bans on single-use plastics, or increased waste compliance fees.

We'll also continue exploring ways to reduce packaging use. This can often take the form of iterative changes, for example, trialling self-locking shipping boxes, or new linerless self-adhesive labels in our UK returns centre. The latter is estimated to reduce general waste collections at the site by approximately 30 tonnes per year.



Design & Production

Overview

Design and production are key components of our circularity framework, as they determine our ability to design products for circularity, influence our approach to materials waste, and offer the potential to minimise our use of chemicals, water, and energy.

Our approach to design and production is supported by our updated circular design strategies, which align with the Textiles 2030 Circular Design Toolkit.¹ These are detailed as part of our circular design collection policy.²

Our circularity framework supports the implementation of these strategies by introducing a commitment to train our suppliers on circular design, building on the learnings from our circular design collections and our continued engagement with industry initiatives.

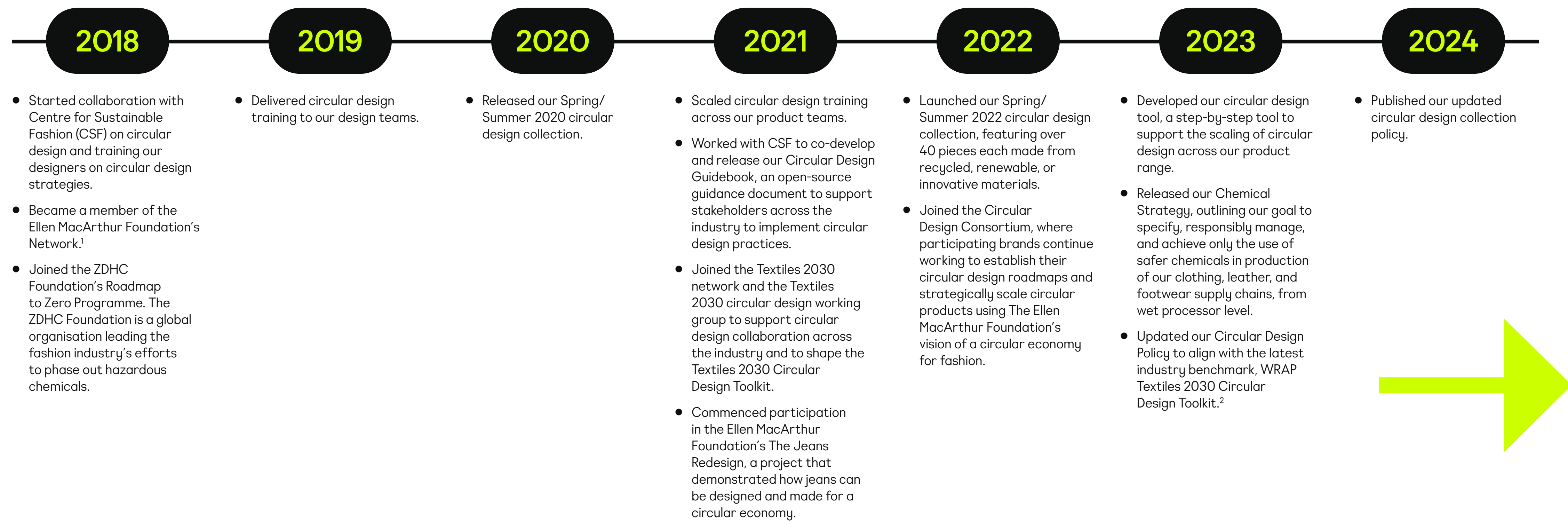


¹<https://www.wrap.ngo/resources/guide/circular-design-toolkit#download-file>

²https://asos-12954-s3.s3.eu-west-2.amazonaws.com/files/1917/2121/9938/ASOS_Circular_Design_Collection_Policy.pdf

OUR STRATEGIC PILLARS | PRODUCT | DESIGN & PRODUCTION

Design & Production in focus



¹<https://www.ellenmacarthurfoundation.org/network/overview>
The Ellen MacArthur Foundation's Network is a pioneering global community committed to taking action to drive systemic change.

²This meant focusing on each lifecycle phase within a product, as outlined and defined by the Ellen MacArthur Foundation's vision of a circular economy for fashion, by encouraging ASOS teams to embrace holistic design: thinking across the entire life of a product and its intended use when making design decisions. The circular design strategies that sit within these are also aligned with the Textiles 2030 Circular Design Toolkit.

Our Circular Design Strategies

Our definition of circular design is underpinned by seven circular design strategies that can be applied across four phases of a product’s lifecycle, illustrated below.

| Lifecycle phase | Circular design strategies | Gold Standard Mandatory (Yes/No) | Silver Standard Mandatory (Yes/N) |
|-----------------|--------------------------------------|-------------------------------------|--------------------------------------|
| Raw Materials | Recycled materials | Y | Y |
| | Renewable and regenerative materials | Y | Y |
| Production | Minimise processing impacts | Y | Y |
| | Minimise material waste | N | N |
| In Use | Design for physical durability | Y | Y (choose one) |
| | Design for versatility | N | N |
| After Use | Design for recyclability | Y | Y (choose one) |

A product that is designed to be fit for a circular economy at ASOS should use a combination of these strategies to address all four of the lifecycle phases. However, this may not always be technically possible or feasible. We’ve therefore split the requirements into Gold and Silver, based on which and how many circular design strategies are achieved at each phase.

Products must meet the Silver standard as a minimum to be included in an ASOS Circular Design Collection. To achieve Silver, products must address both the Raw Materials and Production lifecycle phases and at least one other lifecycle phase (either In Use or After Use). To achieve Gold, the product must address all four lifecycle stages (Raw Materials, Production, In Use, and After Use), and the specified circular design strategies.

Our commitment to training our suppliers will support us in rolling out Silver standard practices across our products, helping to scale circular design more effectively than would be possible through Gold standard collections only.

OUR STRATEGIC PILLARS | PRODUCT | DESIGN & PRODUCTION

Our Targets & Commitments

- **Commitment: Train the manufacturers of our ASOS own-brands and labels clothing products on our ASOS Circular Design Strategies.**
By FY27, launch a phased training programme prioritising suppliers based on their level of business with ASOS.

A detailed definition of each of our targets and commitments is available in the appendix.

Since we started our circular design journey in 2018, we've worked with our partners such as Centre for Sustainable Fashion to deliver training on circular design: first to our designers, then to our product team across buying, merchandising, and garment technology. We've also published our circular design guidebook for use by other designers and brands in the industry. As a natural next step, we're committing to train our final stage manufacturing suppliers for our ASOS own brands on circular design. These suppliers are responsible for most final-stage product manufacture and will be key collaborators to ensure we accelerate the use of circular design across our business and the industry.

Earlier this year, we updated our circular design techniques to reflect the latest industry best practice and the Textiles 2030 Circular Design Toolkit, as well as ensuring denim meets the minimum mandatory requirements of The Jeans Redesign Guidelines.^{1,2,3}

We also tested a new circular design tool, developed in collaboration with the Centre for Sustainable Fashion in 2023. The tool walks our internal product development teams through a step-by-step process to develop a product that adheres to our circular design techniques, with the ambition that this can be used to scale up our circular design assortment.

We delivered bespoke training on circular design to five key suppliers, which was instrumental in developing their capability in this area. This has directly informed our commitment. We'll take a phased approach to scaling up our training, based on our relationships with individual suppliers. Some suppliers will receive mandatory bespoke 1:1 virtual training with ASOS; others mandatory group webinar training; and others mandatory e-learning.

¹<https://emf.thirdlight.com/link/1jxg1ysqnzil-mz55wp/@/#id=1>

²<https://www.wrap.ngo/resources/guide/circular-design-toolkit#download-file>

³https://asos-12954-s3.s3.eu-west-2.amazonaws.com/files/1917/2121/9938/ASOS_Circular_Design_Collection_Policy.pdf

Use & Recovery

Overview

This focus area covers our approach to keeping products in use for longer, circular business models, and recycling. Use and recovery are key components of our circularity framework, as they help our customers to better care for their garments, provide the infrastructure to circulate our products, and offer the potential to close the loop on textile waste.

Recent Highlights

- We've started to encourage our customers to change the way they take care of their products by rolling out Clevercare across our ASOS Design products. Clevercare is a garment labelling system, which aims to extend the life of garments by providing simple care instructions across five areas: washing, bleaching, drying, ironing, and dry cleaning.
- We're committed to testing and trialling circular business models. We piloted a take-back and resale pilot with Thrift+ in 2022, allowing customers to send pre-loved clothes for Thrift+ to be sold online or donated to charity and recycling partners. We also trialled a donation service with delivery company, DPD, supporting customers to donate clothing to five UK charities.
- We launched our first rental edit in partnership with UK rental marketplace, Hirestreet, in May 2023. The collection included over 180 styles available to rent from four to 30 days. The edit focused on women's occasion wear, spanning ASOS DESIGN, ASOS EDITION, ASOS LUXE, as well as the curve, petite and tall ranges.

Our Targets & Commitments

A detailed definition of each of our targets and commitments is available in the appendix.

► Commitment: Facilitate recovery programmes to keep products in use at their highest value. By FY27, we'll pilot or launch new circular business models across resale, rental, takeback, and repair.

Our commitment is to pilot – or launch to customers – at least one circular business model across each area of resale, rental, takeback, and repair.

Through this, we hope to learn more about how we can encourage our customers to keep products in use at their highest value for as long as possible, in line with our circularity framework.

Circular business models are defined as:

- **Resale:** including customer-to-customer and customer-to-business-to-customer resale models
- **Rental:** whether offered directly by ASOS or by a partner
- **Takeback:** where items are collected for reuse or recycling, whether by ASOS or a partner
- **Repair:** including repair kits, repair models, education resources, training videos, and events or workshops

People

See overview

Human Rights

Overview

We recognise our responsibility to respect and protect the human rights of all workers in our supply chain. This means two things: first, avoiding causing or contributing to adverse human rights impacts, both in our supply chain and in the communities supporting it. Second, we must address and remediate those impacts if they occur.

There are multiple human rights challenges currently surfacing globally, ranging from a reduction in rights and freedoms to growing inequality and the human impact of a changing climate. The share of the world’s population living in free environments has fallen, and it’s estimated that 8 in 10 people lived in a ‘partly free’ or ‘not

free’ country as of 2021.¹ For the first time this century, we’ve also seen negative global real wage growth.² For lower income workers, these trends contribute to worsening outcomes and living standards.

Freedom of association and the right to collective bargaining is therefore becoming even more crucial in enabling workers to negotiate for better wages. But levels of unionisation remain limited in garment producing countries and are at risk of further suppression.³ And, with a predominantly women workforce, gender inequality can worsen impacts for those working in the global garment manufacturing industry.

Falls in real wages also have knock-on impacts on modern slavery by increasing risk factors such as vulnerability to exploitation or migrant labour. This has resulted in an increase in modern slavery around the world.⁴

Against this backdrop, our work on respecting and protecting human rights is more important than ever.

¹2022 Freedom House report.
²International Labour Organisation’s (ILO) Global Wage Report 2022-2023.
³According to data from the International Trade Union Confederation and Freedom House.
⁴ILO, Walk Free, and the International Organisation for Migration (IOM) in 2021 estimated nearly 50 million people were living in modern slavery on any given day, an increase of 10 million since 2016.

ASOS salient human rights review

Our supply chain broadly mirrors the supply chain of the wider garment industry. This means that when we talk about addressing risks in our supply chain, what we're often talking about is the global garment industry's supply chain. To address salient human rights risks in our supply chain, we must therefore also look to achieve industry-wide change through the sharing of best practice, collaboration, and joint action – with a view to both the global and the local context.

To help us manage our approach to human rights and ensure that we focus on projects and initiatives that address our biggest and most relevant risk areas, we commissioned a salience human rights review from an independent expert. This uses international methodology (captured in the UN Guiding Principles, and the UN Guiding Principles Reporting Framework) to determine a company's human rights priorities, based on risks to people.²⁷

The review assessed our full value chain. It took in a comprehensive range of inputs, ranging from desktop research and a review of policies and risk assessments, to anonymised insights from peer

companies. It also included interviews with internal and external stakeholders and partners, including leading NGOs working in the fashion space.

It identified four main areas as salient human rights risks for our garment supply chain for ASOS own brands:

- 1. Forced labour (modern slavery)**
- 2. Freedom of Association**
- 3. Wages and benefits**
- 4. Gender discrimination, harassment, and violence**

We recognise that as the internal and external context changes, so must our strategy. We'll continue to adapt our approach to reflect these shifts and to incorporate lessons learnt as we implement our programmes. Our overall aim is enhancing the human rights of all people involved in the manufacture of our fashion products.

We've also developed an approach to address human rights risks related to our brand partners. This includes brand partners we work with through both wholesale and marketplace models. We

acknowledge the risks inherent in partner brand supply chains, especially when sourcing from high-risk territories characterised by issues such as child labour, forced labour, lack of living wages, and poor health and safety standards.

As part of our partner brand engagement programme we've implemented minimum transparency requirements, including the disclosure of factory lists either directly to us or on the Open Supply Hub. Additionally, we've adopted a risk-based approach to identifying, preventing, mitigating, and remediating risks within the supply chains of our brand partners. This approach enables us to prioritise actions to effectively mitigate potential risks.

²⁷ Salient human rights issues are the human rights at risk of the most severe negative impact through the company's activities and business relationships according to the UNGP Reporting Framework.

Recent highlights

We’ve long worked to address issues relating to human rights: whether through our partnership with Anti-Slavery International, our Global Framework Agreement with IndustriALL Global Union, our participation in industry programmes like ACT on Living Wages, or our work identifying and remediating risks throughout our supply chain. Below are some highlights over just the last few years.

| June 22 | Oct 22 | Dec 22 | Mar 23 | May 24 | Aug 24 |
|--|---|---|--|--|---|
| Introduced a commitment to the Transparency Pledge as a minimum requirement for all ASOS partner brands, supporting our continued engagement with our partners on supply chain transparency. | Published our first Policy on Gender Equality in the Supply Chain, setting out our expectations for our suppliers when it comes to gender equality. We also conducted workshops in Morocco and Sri Lanka with women’s rights and labour rights organisations to discuss regional needs in this area. In Morocco, we formed a network of grassroots women’s organisations from different regions in the country. | Partnered with GoodWeave International, a non-profit organisation that promotes transparency in global supply chains. The initial phase of this partnership is focused on supporting three of our primary suppliers based in India. GoodWeave works towards bringing visibility to global supply chains by conducting deep supply chain mapping, remediation and preventative local community and workplace interventions to ensure that products are free of child, forced, and bonded labour. | Extended our partnership with GoodWeave to include our Bangladesh supply chain. Our partnership with GoodWeave will strengthen our existing efforts to combat child labour and modern slavery. | Launched the Fast Forward Brand Association programme, a new initiative designed specifically for UK small and medium-sized brands with a turnover under £36 million. The Brand Associate programme is a collaborative effort between Fast Forward, ASOS, and other brands, aimed at addressing the challenges that SMEs encounter. It seeks to provide a comprehensive solution by offering a step-by-step journey for brands to enhance their knowledge and understanding around decent working conditions and how businesses can operate on a level playing field with accountability and transparency. | Launched the FWI Learning Hub, a comprehensive learning resource centre, offering targeted learning opportunities, guidance, and resources on various topics including the importance of clear policy, transparency, auditing and corrective action planning, and how to identify and remediate modern slavery related risks. Developed with input from our critical friends, Anti-Slavery International, the hub aims to support our brand partners in developing and implementing best practice in the management of their supply chains. |

Our Targets & Commitments

A detailed definition of each of our targets and commitments is available in the appendix.

► Commitment: Implement the ASOS human rights strategy to enhance the human rights of workers across our value chain

By FY27, we'll:

| Forced Labour (Modern slavery) | Freedom of Association | Wages and benefits | Gender empowerment |
|--|--|---|---|
| Develop a modern slavery strategy for goods not for resale (GNFR) suppliers and a toolkit for suppliers, factories, partner brands and non-stock partners. | Renew Global Framework Agreement (GFA) with IndustriALL. | Develop a methodology to collect wage data during audits. | Develop and pilot a Gender Programme at factory level to empower women workers in our supply chain. |

Our strategy maps directly against our four most salient human rights risks identified on page 39: forced labour (modern slavery), freedom of association, wages and benefits, and gender empowerment.

Our Targets & Commitments

A detailed definition of each of our targets and commitments is available in the appendix.

► Commitment: Maintain and build our foundation of effective own brand and partner brand due diligence

By FY27, we'll review and enhance current due diligence mechanisms, and introduce a global grievance channel structure with the aim of maximum accessibility, transparency, confidentiality, and enhanced remedy for workers.

Conducting effective due diligence is already an important part of how we do business. We welcome upcoming legislation that will soon make this due diligence a legal requirement for the whole industry and will require us to extend due diligence to our entire value chain.

The EU Corporate Sustainability Due Diligence Directive, for example, focuses on three main requirements: due diligence, effective grievance channels in the supply chain, and stakeholder engagement at every level of action.

Our Human Rights commitment will help us to comply with this legislation and other relevant regulations, while addressing the salient human rights risks in our supply chain. We'll work with stakeholders to ensure engagement and monitoring from local to international level.

As part of our due diligence, we'll ensure that partner brands sold on our platform are committed to transparency. We'll continue to engage all partner brands to map and share their factory lists in line with industry best practice.

Diversity, Equity, & Inclusion

Overview

Our purpose is to give our customers the confidence to be whoever they want to be.

Through our Diversity, Equity & Inclusion (DEI) focus area, we'll ensure our products, platforms, and services support our purpose, building on the targets we set in 2021 to improve internal representation and equity.

Our customers are at the heart of everything we do, and we work hard to make sure they feel celebrated and represented.

We want to harness the progress we've made to date and work towards long-term ambitions that will make us truly inclusive of our customers and communities.

Our aim is to ensure ASOS is inclusive of all demographics, creates economic equity for marginalised and underrepresented communities, and strives towards a more accessible and inclusive fashion industry.

Our commitments are split into achievable milestones that ensure lasting and impactful change in DEI. As conversations within DEI are always evolving, this strategy will allow for agility across all our priority areas, so it continuously reflects the values and expectations of our customers and communities.



OUR STRATEGIC PILLARS | PEOPLE | DIVERSITY, EQUITY, & INCLUSION

Recent highlights

Building on our years of collaboration with charity partners in this space, we're onboarding two new charity partners: Beyond Equality, which works to create safer and equitable communities by engaging young men and boys to rethink masculinities; and Just Like Us, which works with schools and young people across the UK to ensure LGBTQIA+ young people can thrive. In June, we launched a Pride product range in collaboration with LGBTQIA+ artists, in support of Just Like Us.

In 2023, we launched incubator programme scaleUP with the (Fashion) Minority Report, helping bridge the gap between the fashion industry and global majority-owned¹ brands, who continue to face barriers in accessing the fashion market and scaling up their business operations. We're currently supporting six brands on their journey to scale.

To help drive progress within ASOS, we've signed up to the Race at Work Charter, and are working with The Outsiders Perspective, a not for profit driving racial equality within the fashion industry.

We continue to publish our Ethnicity Pay Gap data (EPG) on an annual basis, alongside our Gender Pay Gap data, as part of our commitment to transparency and inclusivity at ASOS.

¹Global majority is used to refer to all ethnic groups except white British and all other white groups, including white minorities. Global majority-owned brands are defined on page 60.

Our Targets & Commitments

A detailed definition of each of our targets and commitments is available in the appendix.

- **Commitment: Implement our Diversity, Equity, & Inclusion strategy for customers and communities, to drive a safer society for women, girls, and LGBTQIA+ communities; create fairer economic opportunity for global majority creatives; and ensure an inclusive product offering for customers**

By FY27, we'll:

- Establish new charitable partnerships delivering change for those of marginalised gender identities and sexual orientations.
- Develop a plan and process to support and grow our network of global majority-owned brand partners, including scaling our annual incubator programme.
- Launch the first ASOS Design adaptive collection.



Our Targets & Commitments

| What we want to achieve | What we'll do | Why is it important? |
|---|--|---|
| Drive a safer society for women, girls, and LGBTQIA+ people | Establish new charitable partnerships delivering change for those of marginalised gender identities and sexual orientations | <p>This programme aligns to Target 2 of Goal 5 of the UN Sustainable Development Goals, which is to ‘Eliminate all forms of violence against all women and girls in the public and private spheres, including trafficking and sexual and other types of exploitation’.</p> <p>One in three women globally will experience gender-based violence in their lifetime, and 64% of LGBTQIA+ individuals have experienced anti-LGBTQIA+ violence or abuse globally. By challenging systems of oppression (misogyny, gender norms, trans/homo/biphobia, harmful misconceptions) and promoting positive role models and allyship for Women, Girls, and LGBTQIA+ communities, we aim to drive a healthier and more inclusive understanding of gender identity and sexual orientation.</p> |
| Create fairer economic opportunity for global majority creatives | Develop a plan and process to support and grow our network of global majority-owned brand partners, including scaling our annual incubator programme | <p>Global majority communities are under-represented within the fashion industry, and the sector has a poor record when it comes to inclusion.</p> <p>The Black British In Business and Proud report revealed that 53% of global majority entrepreneur respondents experienced societal racism, and many still experience financial barriers when upscaling their business.</p> <p>Financial outcomes are also often worse for global majority business owners, with 38% of Asian and other global majority business owners and 28% of Black business owners reported making no profit compared to 16% of White business owners.</p> <p>By working with more global majority-owned brands and designers and offering opportunities to grow and scale, we can increase the flow of capital towards these businesses and communities. The goal of this is to contribute to a reduction in the economic gap impacting global majority communities.</p> |
| Ensure an inclusive product offering for customers with disabilities and neurodiversity | Launch the first ASOS Design adaptive collection | <p>Over 1 billion people worldwide have disabilities, yet the average disabled household faces higher clothing costs, and the fashion industry is limited in terms of adaptive product.</p> <p>We’ve not done enough in this area as a business, and we want to change. We want to create a more inclusive fashion industry which factors the needs of people with disabilities into products and services and helps reduce the financial pressures that people with disabilities face. We’ll do this by providing products which don’t require additional alterations to be accessible.</p> |

OUR STRATEGIC PILLARS | PEOPLE | DIVERSITY, EQUITY, & INCLUSION

Our Targets & Commitments

► **Target: By FY30, achieve 50% female and 15% ethnically diverse¹ representation across our combined leadership team²**

A detailed definition of each of our targets and commitments is available in the appendix.

We'll continue our focus on improving representation in our leadership team, in line with the internal targets we set in 2021. This target has been amended slightly to account for updates in our methodology and our approach.

We've worked hard to ensure that ASOS is an inclusive place that celebrates difference. These targets reflect our responsibility to make sure our customers feel celebrated and represented by ASOS, which we can only do authentically with a diverse and inclusive workforce and leadership team.

To help us achieve these targets, our programmes of work broadly fall into three areas: recruitment, retention, and culture.

Within recruitment, we'll work to further embed inclusive hiring practices, and we'll continue working with our trusted partner, the Outsiders Perspective, to improve our access to talent from underrepresented communities.

As well as ensuring we have a diverse talent pipeline, we'll enhance our approach to retention, by identifying areas for improvement within our benefits and policies, and increasing internal knowledge sharing to encourage best practice. We'll also work with teams to understand trends and develop plans to address any challenges.

¹Ethnically diverse refers to people who belong to a black, Asian, mixed, or other ethnic group, as defined by the UK Government's 2021 Census.

²Our combined leadership team is defined as Heads of and above. More detail is provided on page 60.

Appendix

Definitions and methodologies

| | | Definition |
|----------------------------|-----------------|---|
| Frequently used ASOS terms | ASOS own brands | <p>These are brands and labels where ASOS is responsible for design and/or production. These are:</p> <div><div><ul style="list-style-type: none">ASOS DesignASOS LuxeASOS EditionASOS 4505Collusion</div><div><ul style="list-style-type: none">Reclaimed VintageTopshopTopmanMiss SelfridgeWeekend Collective</div></div> |
| | Partner brands | <p>These are brands sold on the ASOS platform (ASOS.com and its local websites or the ASOS app) where ASOS is not responsible for design and/or production. It does not include brands sold on other platforms owned by ASOS (i.e. ASOS Marketplace) unless otherwise stated. This can include brands or products sold exclusively sold on ASOS.</p> |
| | ‘By FYXX’ | <p>Unless otherwise stated, targets with a ‘by FYXX’ (i.e. by FY30) time horizon refer to completion by the end of that financial year and/or covering the financial period referenced. They will be reported at the end of that period. Our financial period runs from the start of September each year.</p> |
| | Our Tier list | <p>See our latest Modern Slavery Statement on asosplc.com for a full definition of each of our supply chain tiers.</p> |

| Focus area | Targets & commitments | Definition and methodology |
|------------------|---|--|
| Climate & Nature | Our Greenhouse Gas inventory (page 17) | <p>Our Greenhouse Gas (GHG) inventory covers our entire value chain. In calculating our emissions metrics, we have applied best practice as laid out in the GHG Reporting Protocol – Corporate Standard, working with our partners Vaayu Tech.</p> <p>We have applied the operational boundary of control to our GHG inventory, accounting for all the GHG emissions associated with the operations over which we have operational control. We have not accounted for GHG emissions from operations in which we own an interest but have no operational control.</p> <p>Emissions relating to category 8 (upstream leased assets) have been included in our Scopes 1 and 2 footprint and emissions relating to categories 9 (downstream transport and distribution), 10 (processing of sold goods), 13 (downstream leased assets), 14 (franchises), and 15 (investments) have been excluded from our Scope 3 value chain footprint, as these either fall outside our operational boundary of control or have been determined to be irrelevant or immaterial.</p> <p>Our Scope 3 calculations include an assessment of the materials used in our products. This relies on a series of assumptions. More detail on this is provided on page 55.</p> <p>We use the latest emission factors from the UK Government’s Conversion Factors for Company Reporting combined with industry- specific factors such as the Worldly Materials Sustainability Index (MSI).</p> |
| | By FY27, procure 100% renewable electricity across the ASOS estate. | <p>Our target is to increase our procurement of renewable electricity to cover 100% of electricity consumption across our direct operations (the ASOS Estate) by the end of FY27. We’ll have achieved this target if the total kWh consumed throughout FY27 is from renewable sources.</p> <p>This means that all the electricity consumed throughout FY27 at the premises in the ASOS estate will be generated from one of the following sources:</p> <ul style="list-style-type: none">• Wind• Solar• Geothermal• Sustainably sourced biomass (including biogas)• Sustainable hydropower |

| Focus area | Targets & commitments | Definition and methodology |
|------------------|-----------------------|---|
| Climate & Nature | Continued... | <p>We'll procure this renewable electricity via the following means, in line with best practice:</p> <ul style="list-style-type: none">• Self-generation from facilities owned by ASOS (we do not currently own any facilities, but we may in future)• Direct procurement (through contracts with generators)• Contracts with our electricity suppliers• Unbundled procurement of energy attribute certificates (EACs)• Passive procurement (renewable electricity from the grid, supported by EACs or where the entire market's grid has a >95% renewable generation mix) <p>The ASOS property estate refers to all properties under our direct operational control at any point during the reporting period. These are sites where we have full authority over the energy procurement decision-making. This aligns with the GHG Protocol definition below:</p> <p><i>"A company has operational control over an operation if it or one of its subsidiaries has the full authority to introduce and implement its operating policies at the operation."</i>¹</p> <p>Scope 1 emissions relate to the combustion of natural gas used for stationary equipment (e.g., gas boilers) across ASOS's property estate.</p> <p>Scope 2 emissions use the market-based methodology and relate to the generation or purchase of electricity that is used in owned or controlled equipment across ASOS' property estate. This method reflects the contribution of renewable electricity to our energy portfolio over the reporting period.</p> |

¹<https://ghgprotocol.org/sites/default/files/standards/ghg-protocol-revised.pdf> (p18)

| Focus area | Targets & commitments | Definition and methodology |
|------------------|--|--|
| Climate & Nature | By FY30, reduce the absolute emissions generated by the manufacture of ASOS own-brands and labels products by 42% compared to a FY22 baseline. | <p>Our target is to achieve 318,094 tCO₂e of emissions coming from Category 1a (product) Scope 3 emissions for ASOS own brands in our FY30 reporting period, which runs to September 2030.</p> <p>This is a 42% reduction from Category 1a (product) Scope 3 emissions of 548,438 tCO₂e recorded in FY22.</p> <p>Category 1a (product) emissions are emissions associated with the manufacture of products for our ASOS own brands only. It excludes Category 1a (product) emission generated by our brand partners, and all other Scope 3 emissions, such as transportation from our manufacturers to our fulfilment centres.</p> <p>Calculating emissions related to this target includes an assessment of the materials used in our products. This relies on a series of estimates and assumptions such as product weight. More detail on this is provided on page 55.</p> |
| | By FY30, ensure 90% of emissions generated by brand partner products sold on ASOS come from brands who have set science-based targets. | <p>Our target is that in our FY30 reporting period, 90% of the emissions generated by our brand partners can be attributed to brand partners who have set science-based targets.</p> <p>Emissions measured and attributable to brand partners are:</p> <ul style="list-style-type: none">● Scope 3: 1a: Purchased goods & services● Scope 3: 4: Upstream transportation and distribution● Scope 3: 11: Use of sold products● Scope 3: 12: End-of-life treatment of sold products. <p>Within each emissions category this target assesses only the emissions associated with our brand partner products sold through ASOS platforms or ASOS.com. This includes both products sold by ASOS on a wholesale basis and products sold through a marketplace model (where we don't own the stock but facilitate the sale).</p> <p>It doesn't include products sold through ASOS Marketplace.</p> <p>For products which are fulfilled by our partners on a direct-to-customer partner fulfilment model ("Partner Fulfils"), we currently use proxy data to calculate emissions for Scope 3: Upstream transportation and distribution, Use of sold products, and End-of-life treatment. This is because we're not currently able to collect this data. The proxy data used is based on the emissions factors of similar products fulfilled by ASOS and assumes the highest impact so that we are not under-estimating our emissions.</p> <p>Science-based targets provide a clearly defined pathway for companies to reduce GHG emissions, helping prevent the worst impacts of climate change and future-proof business growth.</p> |

| Focus area | Targets & commitments | Definition and methodology |
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| Climate & Nature | Continued... | Targets are considered ‘science-based’ if they are in line with what the latest climate science deems necessary to meet the goals of the Paris Agreement – limiting global warming to 1.5°C above pre-industrial levels. These targets should either be verified by the Science-Based Targets initiative (SBTi) or have been submitted to SBTi for validation. The SBTi’s target dashboard shows companies that have set science-based targets or have committed to developing targets. We use this data to verify that our partners have set science-based targets that align with SBTi best practice. |
| | By FY50, reduce 90% of the absolute emissions generated by our entire value chain compared to a FY22 baseline. | <p>Our target is to achieve 189,180 tCO₂e of value chain emissions in our FY50 reporting period, which runs to September 2050. This is a 90% reduction from our baseline value chain emissions of 1,891,798 tCO₂e recorded in FY22.</p> <p>Value chain emissions include all Scope 1 and 2 emissions and the following Scope 3 categories:</p> <ul style="list-style-type: none">● 1a: Purchased goods and services (product)● 1b: Purchased goods and services (non-product)● 2: Capital goods● 3: Fuel and energy-related activities● 4: Upstream transportation and distribution● 5: Waste generated in operations● 6: Business travel● 7: Employee commuting <p>It doesn’t include category 11 (Use of sold products) and category 12 (End-of-life treatment of sold products) as these categories fall outside of our boundary of operational control and are not mandatory for target setting under GHG Protocol guidance.¹</p> |

¹https://ghgprotocol.org/sites/default/files/standards/Corporate-Value-Chain-Accounting-Reporting-Standard_041613_2.pdf

APPENDIX | PRODUCT

| Focus area | Targets & commitments | Definition and methodology |
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| Raw materials | Commitment: Increase our use of more sustainable materials in our ASOS own brand clothing products. Each year, we'll set a target for the proportion of our overall material use to be more sustainable over that FY, and report back on our progress. | <p>Our commitment is to increase our use of 'more sustainable' materials each year. At the end of each year, we'll disclose our performance against that year's target as part of our annual sustainability report, and set a new target for the following year. This will be based on the internal targets we've set our teams.</p> <p>We define 'more sustainable' materials as those that meet the following criteria:</p> <ol style="list-style-type: none">The production of the raw material type has on average a lower environmental impact than the production of the conventional form of that material.The material type is widely recognised within the industry as a more sustainable material.The sustainable material content is traceable up to fabric or end product, as verified either by physical tracer using well-established tracer technology, or by credible and robust chain of custody/traceability and assurance (auditing/ verification) systems that meets recognised good practice criteria.¹The relevant standard-setting body, or owner of the branded sustainable material, operates in accordance with ISEAL Credibility Principles. <p>Our current list of defined more sustainable materials is:</p> <ul style="list-style-type: none">Cotton – recycled cotton certified to Recycled Claim Standard (RCS) or Global Recycled Standard (GRS); organic cotton certified to Global Organic Textiles Standard (GOTS) or Organic Content Standard (OCS); Better CottonPolyester and nylon – recycled polyester or nylon certified to Recycled Claim Standard (RCS) or Global Recycled Standard (GRS)Viscose and other man-made cellulosic fibres (MMCFs) - LENZING™ ECOVERO™; TENCEL™ Lyocell; TENCEL™ Modal; TENCEL™ fibres produced with REFIBRA™ technology (TENCEL™ x REFIBRA™); Livaeco by Birla CelluloseOther recycled materials certified to RCS or GRS including recycled zinc, steel, silver and brassRecycled Sterling Silver certified to Responsible Jewellery Council (RJC) Chain of Custody standard |

¹Better Cotton is one exception to this rule. In line with many peers and the main sustainable materials benchmark used by the industry (Textile Exchange Preferred Fiber and Materials Matrix <https://textileexchange.org/about-materials-matrix/>), ASOS accepts Better Cotton as a more sustainable material. Although Better Cotton is not physically traceable to end product and operates on a mass balance system, the movement of Better Cotton through the supply chain is tracked by a system of credits which ensures that, for every 1kg of Better Cotton that ASOS sources, an equivalent amount of raw cotton is being grown somewhere in the world using [Better Cotton Production Principles](#). Read more about the mass balance system at <https://bettercotton.org/massbalance>.

| Focus area | Targets & commitments | Definition and methodology |
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| Raw materials | Continued... | <p>This target only applies to clothing products produced for our ASOS own brands. All partner brand products are excluded, as are non-clothing products from ASOS own brands, such as accessories or footwear.</p> <p>With the exception of Better Cotton, this target is measured through our ‘tonnage methodology’. This calculates the overall weight of sustainable materials used as a proportion of our total materials weight. This calculation depends on a series of documented estimates and assumptions such as product weight and overall composition. We have conducted sensitivity analysis on our estimates and assumptions to determine the risk of potential errors in our reported figures. This work identified that no reasonable possible change in our estimates and assumptions would result in our reported figures changing by 5% or more (our ESG materiality based on the SBTi’s triggered recalculation criteria thresholds). As a result, we do not consider these estimates or assumptions to be materially sensitive.</p> <p>As this tonnage methodology is important not just for this target but also for calculating our Scope 3 emissions, we’ve published a document covering our approach, available on the ASOS plc site.¹</p> <p>The volume of Better Cotton we report is based on the volume of Better Cotton Claims Units (BCCUs) received during the financial period. There is typically a delay between a product being purchased and received by ASOS and the receipt of an associated BCCU. This means that BCCUs reported may not directly correlate to the actual quantity of Better Cotton purchased over the reporting period. For example, BCCUs received in September and October 2024 (reported in our FY25) may be for products originally purchased and received in July or August 2024 (our FY24).</p> |
| | Test and introduce innovative packaging materials and solutions, reducing overall usage where appropriate. By FY26, we’ll increase recycled content in mailing and garment bags to a minimum of 95%. | <p>We’ll have achieved this commitment when our garment and mailing bags are made of at least 95% post-consumer recycled material. We use Low Density Polyethylene in our garment and mailing bags. This is certified to Recycled Claim Standard (RCS) or Global Recycled Standard (GRS) or ISO 14021.</p> <p>Garment bags are used to protect our products during their lifecycle within our supply chain and are used by our garment manufacturer and returns centres. Mailing bags are used exclusively by our fulfilment centres for shipping products to our customers.</p> <p>Alongside this, we’ll also continue to test innovative new packaging materials and solutions.</p> |

¹ asosplc.com/fashion-with-integrity/

| Focus area | Targets & commitments | Definition and methodology |
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| Design & Production | <p>Train the manufacturers of our ASOS own brand clothing products on our ASOS Circular Design Strategies. By FY27, we'll have launched a phased training programme prioritising suppliers based on their level of business with ASOS.</p> | <p>Suppliers will receive training in one of three training phases and methods, depending on their relationship with ASOS.</p> <ul style="list-style-type: none">● Phase 1: mandatory bespoke 1:1 training over video call● Phase 2: mandatory group webinar training● Phase 3: mandatory e-learning <p>We'll have achieved this commitment when:</p> <ul style="list-style-type: none">● We've developed a training programme for suppliers● Phase 1 of our training programme, which targets key suppliers, has been rolled out with all training sessions either scheduled or having taken place <p>This commitment covers Tier 1 suppliers manufacturing ASOS own brand clothing products only. It does not cover suppliers across non-clothing, footwear, or brand partner products.</p> <p>Tier 1 suppliers cover finished product manufacturing: cut make trim (CMT), garment stitching, sewing, product assembly, or lasting.</p> <p>Our circular design strategies describe certain objective circular design criteria requirements within a lifecycle phase, such as designing for physical durability, and are based on industry standards. A certain number of design strategies must be met to achieve Gold or Silver Standard, some of which are mandatory. The exact criteria are set out in the ASOS Circular Design Collection Policy on the ASOS plc site.¹</p> |
| Use & Recovery | <p>By FY30, 15% of ASOS own brand and partner brand products sold on ASOS will circulate through a circular business model across reduce, resale, rental, takeback, and repair.</p> | <p>We'll have achieved this commitment when:</p> <ul style="list-style-type: none">● We've piloted and/or launched to customers at least one circular business model across each area of resale, rental, takeback, and repair <p>Circular business models are defined as:</p> <ul style="list-style-type: none">● Resale: clothing resale models, including customer-to-customer and customer-to-business-to-customer● Rental: clothing rental services, whether offered directly by ASOS or by a partner● Takeback: clothing collection services where items are collected for reuse or recycling, whether by ASOS or a partner● Repair: services supporting garment repair, including the sale of repair kits, repair models, education resources, training videos, or events/workshops |

¹https://asos-12954-s3.s3.eu-west-2.amazonaws.com/files/1917/2121/9938/ASOS_Circular_Design_Collection_Policy.pdf

| Focus area | Targets & commitments | Definition and methodology |
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| Human Rights | Implement our human rights strategy to enhance the human rights of workers across our value chain. | <p>Our commitment in this area is to implement all the actions we’ve set out within our human rights strategy by the end of FY27. These are as follows:</p> <ol style="list-style-type: none">Develop a new modern slavery strategy for goods not for resale (GNFR) suppliers and a toolkit for suppliers, factories, partner brands, and non-stock partners. <p>We’ll have completed this action when:</p> <ul style="list-style-type: none">We’ve completed an analysis of priority risk areas within our GNFR supply chainA workplan has been created to support the implementation of human rights due diligenceHuman rights due diligence is being conducted within our inbound supply chainOur third-party logistics operators (3PLs) are being assessed through a self-assessment questionnaire based on the warehousing social standard, with plans for future auditing to take place as part of the workplanAn internal programme has been established to conduct human rights due diligence of the service providers within our officesGuidance has been developed that can be shared with our partners to communicate best practice and support them in conducting due diligence within their GNFR supply chains <ol style="list-style-type: none">Renew Global Framework Agreement (GFA) with IndustriALL Global Trade Union. <p>We’ll have completed this action when:</p> <ul style="list-style-type: none">Both ASOS and IndustriALL have signed a new global framework agreement (replacing this 2017 agreement) and this has been published <ol style="list-style-type: none">Develop a methodology to collect wage data during audits. <p>We’ll have completed this action when:</p> <ul style="list-style-type: none">We’ve produced and finalised an internal ‘methodology’ document setting out what wage data we will collect from our suppliers |

| Focus area | Targets & commitments | Definition and methodology |
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| Human Rights | Continued... | <ul style="list-style-type: none">This methodology and calculation method has been integrated into our auditing processesAuditors have been trained on this methodologyWe’ve conducted our first audit using this methodology <p>4. Develop and pilot a Gender Programme at factory level to empower women workers in our supply chain.</p> <p>We’ll have completed this action when:</p> <ul style="list-style-type: none">We’ve developed the guidelines for implementation, including meeting plans and agendas for factoriesWe’ve implemented training by meeting directly with women in at least two factoriesWe’ve assessed the performance of the pilot and produced an assessment report |
| | Maintain and build our foundation of effective own brand and partner brand due diligence. By FY27, we’ll review and enhance current due diligence mechanisms, and introduce a global grievance channel structure with the aim of maximum accessibility, transparency, confidentiality, and enhanced remedy for workers. | <p>Our commitment in this area is to implement all the below actions by the end of FY27:</p> <p>1. Review and enhance current due diligence mechanisms and introduce a global grievance model that ensures accessibility, transparency, confidentiality and enhanced remedy for workers.</p> <p>We’ll have completed this action when:</p> <ul style="list-style-type: none">We’ve held consultation meetings with our stakeholders and critical friends on our due diligence mechanismsWe’ve created and introduced a global grievance model that defines how we manage grievances together with NGO partners with the aim of maximum accessibility, transparency, confidentiality, and enhanced remedy for workers <p>2. Ensure that partner brands sold on our platform are committed to transparency. This includes all brand partners regardless of product type - including accessories, footwear, clothing and apparel, and Face + Body.</p> <p>To ensure we meet this commitment we’ll require:</p> <ul style="list-style-type: none">Brand partners to share factory lists with ASOS and commit in writing (either publicly or directly to ASOS) to have published their factory lists either on their own websites or the Open Supply Hub by 2027 |

| Focus area | Targets & commitments | Definition and methodology |
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| Human Rights | Continued... | <ul style="list-style-type: none">Brand partners to share with us their approach to human rights due diligence and supply chain transparency through our self- assessment questionnaire (SAQ) which includes a dedicated section on supply chain due diligence covering traceability, transparency, auditing process, internal resourcing, governance, and more. We also accept the Brand retail module (BRM) from Cascale brand members |
| Diversity, Equity, & Inclusion | Implement our Diversity, Equity & Inclusion strategy for customers and communities, to drive a safer society for marginalised genders; create fairer economic opportunity for global majority creatives; and ensure an inclusive product offering for customers with disabilities and neurodiversity. | <p>Our commitment in this area is to implement all the actions we’ve set out within our DE&I strategy for customers and communities by the end of FY27. These are as follows:</p> <ol style="list-style-type: none">Establish new charitable partnerships delivering change for people of marginalised gender identities and sexual orientations. We’ll have achieved this action when:<ul style="list-style-type: none">We’ve onboarded at least two new charity partners to ASOSWe’ve delivered at least one project or programme with each of these partners working towards gender equality and/or LGBTQIA+ inclusivity<p>Marginalised gender identities and sexual orientations are defined by the experiences of people holding those identities or orientations. This includes discrimination, inequity, inequality, a lack of representation, or a lack of inclusion.</p><p>Gender identity refers to a person’s internal sense of their own gender. This does not have to be man or woman. It could be, for example, non-binary. Sexual orientation describes who a person is emotionally, romantically or sexually attracted to.</p>Develop plan and process to support and grow our network of global majority-owned brand partners, including scaling our annual incubator programme. We’ll have achieved this action when:<ul style="list-style-type: none">We have an established process to support the onboarding of global majority-owned brand partnersWe’ve taken action to identify and/or remove barriers to working with ASOS for global majority-owned brand partnersWe’ve launched at least one further iteration of our incubator programme, ScaleUP, delivered with the (Fashion) Minority Report, with wider reach and additional support provided to prospective brands |

| Focus area | Targets & commitments | Definition and methodology |
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| Diversity, Equity, & Inclusion | Continued... | <p>Global majority is used to refer to all ethnic groups except white British and all other white groups, including white minorities. Global majority-owned is defined by one or more of the following statements:</p> <ul style="list-style-type: none">a. 50% or more of the management team are from global majority backgrounds, or if a person who is global majority is in sole control of the business.b. business with multiple owners, of which global majorities are the majority.c. business where people from global majority backgrounds are the majority shareholders. <p>3. Launch the first ASOS Design adaptive collection</p> <p>We'll have achieved this action when:</p> <ul style="list-style-type: none">● We've made an adaptive collection available for sale to customers on ASOS. Adaptive refers to clothing designed around the needs and abilities of people with disabilities or neurodiversity. |
| | By FY30, achieve 50% female and 15% ethnically diverse representation across our combined leadership team. | <p>We'll calculate progress on this target as a snapshot at the end of the reporting year.</p> <p>The 'female' percentage is taken from legal sex data disclosed by employees in Workday (our people system). This data is available for 100% of employees. We're working towards being able to measure and report on 'women' (i.e. gender rather than legal sex) to ensure we're taking gender identity into consideration.</p> <p>'Ethnically diverse' in the data refers to those who identify as Asian, Black, Mixed or Other, based on the UK Government's 2021 Census.¹ This data is disclosed in our internal systems. 95% of employees have provided this data. Where data is not available it is excluded from the calculation.</p> <p>'Combined leadership team' refers to leaders above 'Translate' level across the business, grouped together to form an average. 'Translate' level at ASOS refers to 'Head of' level and above.</p> |

¹<https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/ethnicity/bulletins/ethnicgroupenglandandwales/census2021>



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