

# Fashion with Integrity (FWI) supplementary information

Scope: ASOS

Last updated: 21 November 2025

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# 1. Introduction

This document provides key supporting information relating to ASOS' Fashion with Integrity programme.

This document provides supporting key information relating to Fashion with Integrity, ASOS' programme for sustainability and corporate responsibility. It details target updates and definitions, methodologies for emissions and material use calculations, and sensitivity analyses supporting sustainability claims.

# 2. Target updates changelog

\*Target or commitment

Date and location of	Pillar	T/C*	New version	Previous version	Rationale
DATE  2025 Annual Report & Accounts, page XX	Planet	T	Net Zero carbon across our entire value chain by FY50, progress towards brandspecific decarbonisation pathways. with a 90% reduction in absolute emissions from our FY22 baseline.	By FY50, reduce 90% of the absolute emissions generated by our entire value chain compared to a FY22 baseline.	This target has passed Science Based Targets initiative (SBTi) Validation. The changes made were to satisfy their technical requirements.
DATE  2025 Annual Report & Accounts, page XX	Planet	Т	Reduce absolute Scope 3 emissions from purchased goods and services and upstream transportation* and distribution by 42% by FY30.  * In line with Science Based Targets initiative (SBTI) guidance this covers 100% of our Category 1a and 12.9% of our Category 4 emissions	By FY30, reduce the absolute emissions generated by the manufacture of ASOS own brands and labels products by 42% compared to a FY22 baseline	This target has passed Science Based Targets initiative (SBTi) Validation. The changes made were to satisfy their technical requirements.
DATE  2025 Annual Report & Accounts, page XX	Planet	Т	Reduce absolute Scope 1 and 2 GHG emissions by 45% by FY30 from our FY22 baseline; and source 100% renewable electricity across the ASOS Estate by 2027.	By FY27, procure 100% renewable electricity across the ASOS estate.	This target has passed Science Based Targets initiative (SBTi) Validation. The changes made were to satisfy their technical requirements. Further, the renewable electricity portion of this target has been approved by RE100.
DATE  2025 Annual Report & Accounts, page XX	Planet	Т	Target removed	By FY30, ensure 90% of emissions generated by brand partner products sold on ASOS come from brands who have set science-based targets.	This target has been removed as part of our SBTi validation. We will continue to engage with our brand partners to ensure they set science-based targets.
DATE  2025 Annual Report & Accounts, page XX	People	С	Grow our connection with underrepresented customers and communities through authentic, impactful partnerships and programmes.	Implement our external Diversity, Equity & Inclusion strategy to drive a safer society for women, girls, and	Updated for clarity and to refocus on commercial opportunity
DATE  2025 Annual Report & Accounts, page XX	People	С	Support and amplify new and emerging talent and brands to help make fashion more inclusive, exciting, and relevant	LGBTQIA+ people; create fairer economic opportunity for global majority creatives; and ensure an inclusive	



	product offering for customers with disabilities and neurodiversity.	
	neurodiversity.	

# 3. Definitions and Methodologies

Frequently used ASOS terms			
ASOS own brands	These are brands and labels under ASOS' operational control.		
Partner brands	Brands sold on the ASOS platform (ASOS.com and its local websites or the ASOS app) where ASOS does not have operational control. This can include brands or products sold exclusively on ASOS. It also includes brands sold through Partner Fulfils or other flexible business models.		
'By FYXX'	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.		
Our Tier list	Defined in our Modern Slavery Statement.		
	PLANET		
Greenhouse Gas inventory	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 partner Vaayu Tech.		
	We have applied the operational boundary of control to our GHG inventory, accounting for the GHG emissions associated with all activities over which we have operational control. We have not accounted for GHG emissions from activities in which we own an interest but have no operational control, and therefore no authority to influence.		
	Emissions relating to categories, 10 (processing of sold goods), 13 (downstream leased assets), 14 (franchises), and 15 (investments) have been excluded from our Scope 3 footprint, as these either fall outside our operational boundary of control or have been determined to be immaterial. We will continue to review whether any activity in these areas fall within our boundary of control, and will report on the emissions associated with these as/when appropriate.		
	Our Scope 1 & 2 emissions relate to energy consumption and f-gas leakage across the ASOS Estate. The ASOS 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: "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."		
	Where sites in the ASOS Estate are leased to sub-tenants who take control of energy procurement decision-making, these emissions will be reported under Scope 3 Category 8.		
	Our Scope 3 calculations include an assessment of the volumes of materials used in our products. This relies on a series of assumptions. More detail on this is provided in the sensitivity analysis section below.		
	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).		
Net Zero carbon across our entire value chain by FY50, progress towards	Value chain emissions include all Scope 1 and 2 (market-based) emissions and the following Scope 3 categories:		
brand-specific decarbonisation	1a: Purchased goods and services (product)		
pathways. with a 90%	1b: Purchased goods and services (non-product)		
reduction in absolute	2: Capital goods		
emissions from our FY22 baseline.	3: Fuel and energy-related activities  A Unatage of the property of the p		
Dadomio.	4: Upstream transportation and distribution     5: Waste generated in exercising.		
	5: Waste generated in operations		



#### 6: Business travel

- 7: Employee commuting
- 8: Upstream Leased Assets
- 9: Downstream Transportation and Distribution

Our target is to achieve a 90% reduction (to  $182,866tCO_{2}$ e) from our FY22 baseline value chain emissions of  $1,828,661tCO_{2}$ e in our FY50 reporting period, which runs to end of August 2050.

Reduce absolute Scope 1 and 2 GHG emissions by 45% by FY30 from our FY22 baseline; and source 100% renewable electricity across the

ASOS Estate by 2027.

Category 11 (Use of sold products) and Category 12 (End-of-life treatment of sold products) are excluded as these categories fall outside our boundary of operational control and are not mandatory for target setting under <u>GHG Protocol guidance</u>.

Our target is to achieve a 45% reduction (to 3,518 tCO<sub>2</sub>e) by FY30 from our FY22 baseline scope 1 and market-based scope 2 emissions of 6,397 tCO<sub>2</sub>e, in our FY30 reporting period, which runs to end of August 2030.

Scope 1 emissions relate to the combustion of natural gas used for stationary equipment (e.g., gas boilers) across ASOS's property estate. It also includes losses from our air-conditioning units (F-gas leakage). 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.

A market-based method reflects emissions from electricity that companies have purposefully chosen (or their lack of choice). It derives emission factors from contractual instruments, which include any type of contract between two parties for the sale and purchase of energy bundled with attributes about energy generation, or for unbundled attribute claims.

To support this emission reduction, we are also targeting an increase in active annual sourcing of renewable electricity across our direct operations (the ASOS estate) from 80.3% coverage in FY22, to 100% coverage by the end of FY27 and we commit to continue active annual sourcing of 100% renewable electricity through to the end of FY30.

We'll have achieved this target if the total kWh consumed from FY27 through to FY30, is from renewable sources. This means that all the electricity consumed within this period, at the premises in the ASOS estate, will be generated from one of the following sources:

- Wind
- Solar
- Geothermal
- Sustainably sourced biomass (including biogas)
- Sustainable hydropower

We'll procure this renewable electricity via the following means, in line with best practice:

- 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)

The ASOS 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 <a href="GHG Protocol definition">GHG Protocol definition</a>: "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."

Reduce absolute Scope 3 emissions from purchased goods and services and upstream transportation and distribution by 42% by FY30 In line with Science Based Targets initiative guidance, this target covers 100% of emissions relating to Purchased Goods for Resale (Category 1a) and 13% of emissions relating to Upstream Transportation and Distribution (Category 4).

Our target is to achieve 710,078 tCO $_2$ e of emissions from Category 1a (product) Scope 3 emissions for ASOS own brands and partner brands in our FY30 reporting period. This is a 42% reduction from Scope 3 Category 1a (product) emissions of 1,224,272 tCO $_2$ e recorded in FY22.

Category 1a (product) emissions are emissions associated with the manufacture of products for our ASOS own brand and partner brand products. Calculating emissions



related to this target includes an assessment of the materials used in our products sold on our platform. This relies on a series of estimates and assumptions such as product weight. We have determined these estimates are not sensitive. More detail is provided in section 3 of this document.

Additionally, our target is to reduce our Category 4 emissions by 22,866 tCO2e. This represents a 42% reduction of 12.9% of our Category 4 emissions. Category 4 emissions (upstream transportation and distribution) are associated with transportation and distribution of products between Tier 1 suppliers and own operations including transport of the product between our warehouses. It also includes transportation emissions from our operations to the customers and transportation related to returns.

#### PRODUCT

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.

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.

We define 'more sustainable' materials as those that meet the following criteria:

- 1. The production of the raw material type has on average a lower environmental impact than the production of the conventional form of that material.
- 2. The material type is widely recognised within the industry as a more sustainable material.
- 3. 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.<sup>1</sup>
- 4. The relevant standard-setting body, or owner of the branded sustainable material, operates in accordance with ISEAL Credibility Principles.

We maintain a list of accepted more sustainable materials. This includes materials certified to Global Organic Textiles Standard (GOTS), Organic Content Standard (OCS), Recycled Claim Standard (RCS), Responsible Wool Standard (RWS), Responsible Down Standard (RDS), Responsible Mohair Standard (RMS), Responsible Alpaca Standard (RAS), Good Cashmere Standard (GCS), Master of flax standard (European flax), and Leather Working Group. We also accept branded man-made cellulosic fibres including LENZING™ ECOVERO™; TENCEL™ Lyocell; TENCEL™ Modal; TENCEL™ fibres produced with REFIBRA™ technology (TENCEL™ x REFIBRA™); Livaeco by Birla Cellulose, and others. It also includes Better Cotton, which is sourced via a system of mass balance.

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.

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 is detailed in the section below.

The volume of Better Cotton we report is based on the volume of Better Cotton Claims Units (BCCUs) received.

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

We'll have achieved this commitment when our plastic garment and mailing bags are made of at least 95% post-consumer recycled material, certified to Recycled Claim Standard (RCS) or Global Recycled Standard (GRS) or ISO 14021. 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. Alongside this, we'll also continue to test innovative new packaging materials and solutions.

<sup>&</sup>lt;sup>1</sup>Better 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.



Train the manufacturers of our ASOS own brand clothing products on our ASOS Čircular Design Strategies. By FY27, we'll have launched a phased training programme prioritising suppliers based on their level of business with **ASOS** 

Suppliers will receive training in one of three training phases and methods, depending on their relationship with ASOS

- Phase 1: mandatory bespoke 1:1 training over video call
- Phase 2: mandatory group webinar training
- Phase 3: mandatory e-learning

We'll have achieved this commitment when:

- 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

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.

Tier 1 suppliers cover finished product manufacturing: cut make trim (CMT), garment stitching, sewing, product assembly, or lasting. 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

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.

We'll have achieved this commitment when:

We've piloted and/or launched to customers at least one circular business model across each area of resale, rental, takeback, and repair

Circular business models are defined as:

- Resale: clothing resale models, including customer-to-customer and customerto-business-to-customer
- Rental: clothing rental services, whether offered directly by ASOS or by a
- 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

#### PEOPLE

Implement our human rights strategy to enhance the human rights of workers across our value chain.

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:

- 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. We'll have completed this action when:
  - We've completed an analysis of priority risk areas within our GNFR supply chain
  - A workplan has been created to support the implementation of human rights due diligence
  - Human rights due diligence is being conducted within our inbound supply chain
  - Our 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 workplan
  - An internal programme has been established to conduct human rights due diligence of the service providers within our offices
  - Guidance 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 Renew Global Framework Agreement (GFA) with IndustriALL Global Trade
- Union. We'll have completed this action when:
  - Both ASOS and IndustriALL have signed a new global framework agreement (replacing this 2017 agreement) and this has been published
- Develop a methodology to collect wage data during audits. We'll have completed this action when:
  - We've produced and finalised an internal 'methodology' document setting out what wage data we will collect from our suppliers
  - This methodology and calculation method has been integrated into our auditing processes
  - Auditors have been trained on this methodology



	d. We've conducted our first audit using this methodology 4. Develop and pilot a Gender Programme at factory level to empower women workers in our supply chain.
	We'll have completed this action when:  a. We've developed the guidelines for implementation, including meeting plans and agendas for factories  b. We've implemented training by meeting directly with women in at least two factories  c. We've assessed the performance of the pilot and produced an assessment report
	Looking beyond FY26, we're reviewing how best to scale our gender programme across more sourcing countries.
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 grievance channel structure with the aim of maximum accessibility, transparency, confidentiality, and enhanced remedy for workers.	Our commitment in this area is to implement all the below actions by the end of FY27:  1. Review and enhance current due diligence mechanisms and introduce a grievance model that ensures accessibility, transparency, confidentiality and enhanced remedy for workers. We'll have completed this action when:  a. We've held consultation meetings with our stakeholders and critical friends on our due diligence mechanisms  b. We've created and introduced a grievance model that defines how we manage grievances together with civil society partners/ worker representatives with the aim of maximum accessibility, transparency, confidentiality, and enhanced remedy for workers  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. To ensure we meet this commitment we'll require:  a. Engagement with all partner brands to map and share their factory lists in line with industry best practice  b. Brand partners to provide their human rights and supply chain due diligence approach, either publicly or via a self-assessment questionnaire (SAQ) to ASOS, which covers supply chain traceability, transparency, risk management, internal resourcing, governance, and related areas.
Grow our connection with underrepresented customers and communities through authentic, impactful partnerships and programmes.	Our current focus within this commitment is on delivering our first ASOS Design adaptive range for our customers with disabilities and neurodiversity, scheduled for launch in FY26.  Future activity under this commitment will focus on delivering initiatives that support customers and communities that we deem to be underrepresented on ASOS. We will focus on partnerships and programmes that have a clear, tangible impact for those customers.
Support and amplify new and emerging talent and brands to help make fashion more inclusive, exciting, and relevant	Our current focus within this commitment is on delivering the second cohort of our ScaleUP incubator programme with the (Fashion) Minority Report, which supports global majority owned brands to access the fashion industry and scale their businesses  Future activity under this commitment will focus on supporting up and coming fashion brands or designers, where ASOS can offer support in growing scale or reach. We will focus on initiatives and programmes that prioritise inclusion and access to the industry, alongside the latest fashion.
By FY30, achieve 50% female and 15% ethnically diverse representation across our combined leadership team.	We'll calculate progress on this target as a snapshot at the end of the reporting year. 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. 'Ethnically diverse' in the data refers to those who identify as Asian, Black, Mixed or Other, based on the UK Government's 2021 Census. This data is disclosed in our internal systems. Where data is not available it is excluded from the calculation. '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.



# 4. Sensitivity analysis on tonnage methodology

Date: November 2024

Disclosure last updated: October 2025 (updating target references & conclusion)

#### Overview

Product materials data – the type and volume of materials used in products sold on ASOS – is key to measuring our sustainability performance. This data feeds into several of our Fashion with Integrity targets and calculations, including:

- Our measurement of our use of more sustainable materials (defined above).
- Our calculation of Scope 3 Category 1a (purchased goods for resale) emissions related to both ASOS own brands and partner brands. This feeds into the following targets:
  - Net Zero carbon across our entire value chain by FY50, progress towards brand-specific decarbonisation pathways. with a 90% reduction in absolute emissions from our FY22 baseline.
  - Reduce absolute Scope 3 emissions from purchased goods and services and upstream transportation and distribution by 42% by FY30.
- Our assessment of our dependency on certain material types.
- Our analysis of climate-related (and, in future, nature-related) risks and opportunities.

To calculate our materials data, we generate an internal 'tonnage report' estimating the weight of material used. Our tonnage report methodology takes in a range of data sources from across ASOS. It applies several assumptions and estimates (detailed below) for specific data points where there is a lack of granularity, or the data is not available. This methodology, and our assumptions, will evolve as more data becomes available.

### Tonnage report - scope

This report includes product data from the following areas:

- All ASOS own brand products
- All partner brand products, excluding Face + Body
- All business models, excluding our marketplace model, Partner Fulfils
- All product types, excluding Face + Body and other non-clothing/accessories products (i.e. gifting).

## Tonnage report – methodology and calculation

To calculate the weight of each material used in products sold on ASOS, we apply a series of automated steps for all products within scope:

- Calculate the total estimated weight for each product line using an estimated weight for each size and inventory records.
- Divide this weight proportionally by the composition of each material in the product. For some product types, this composition is based on estimates, as detailed below.
- Split the material weight into its more sustainable and conventional variants as required. This is based on certain manually inputted data and assumptions, detailed below.



• Add total weight of each material type across all products.

Where we have external data that tells us the amount of material we used, we do not include this within the tonnage methodology. For example, Better Cotton is not currently measured using this methodology.

Tonnage report – key inputs, assumptions and estimates

We use the following key inputs, assumptions and estimates:

- 1. Accuracy of input data (input).
  - i. While not an estimate or assumption, the product attribution data is manually input and therefore at risk of error. We have implemented a number of controls to mitigate this, however further refinement of these is required. Through sensitivity analysis performed (detailed below), it has been determined that no reasonable possible change in the inputs could lead to a material change in the related outputs.
- 2. Weight of each size (estimate).
  - i. We estimate the average weight of each product size based on data from an internal study of weight differences conducted across a range of product types.
- 3. Prominence of each component in a multi-component product (estimate).
  - i. We estimate the proportion of different components within each product type (e.g. for a jacket, the "Main" represents 80% of the garment and the "Lining" represents 20% of the garment). This is based on data from an internal study carried out across multiple product types. Our estimates have a small level of variation from estimates commonly used across the industry.
- 4. Proportion of more sustainable materials within a material type (assumption).
  - i. We use assumptions (based on data from an internal study and industry data) to determine the proportion of a material that would be classified as more sustainable. If a product is tagged as recycled cotton on our systems, for example, the presence of recycled cotton is capped at 20% of the relevant fabric composition. This is due to limitations related to mechanical recycling of cotton which means that recycled cotton can only form 20% of a fabric.

#### Conclusion

To support our FY24 sustainability disclosures, we conducted sensitivity analysis on the above inputs, estimates, and assumptions to determine the risk of potential errors in our reported figures. This work identified that no reasonable possible change in our inputs, estimates and assumptions would result in our reported figures changing by 5% or more. 5% is the threshold at which we consider potential inaccuracies in data to be material from an ESG reporting perspective, based on the Science Based Targets initiative threshold for triggering a recalculation of carbon emissions. As a result, we do not consider these estimates or assumptions to be materially sensitive.

As there is no reasonable possible change that would cause an impact to our reported figures exceeding our 5% threshold, we have not re-run our analysis for our FY25 Annual Report, even though the volumes and mix of some materials have changed.

