



Modern Slavery Statement

September 2023 – August 2024

Foreword

Modern slavery and forced labour are intricate global challenges. As an international business, we acknowledge our twofold obligation: firstly, to perform thorough due diligence within our supply chain to address these risks; and secondly, to work in partnership to promote industry-wide transparency and broader systemic reform. Both are essential to safeguard vulnerable individuals from exploitation and ensure their rights to fair work and safety are upheld.

This is our ninth Modern Slavery Statement, published in accordance with the UK Modern Slavery Act (2015) and our second report published in accordance with the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act. The statement sets out our approach to preventing modern slavery and forced labour in our supply chain and business operations and provides an update on the steps taken from September 2023 to August 2024.

Over the period covered by this statement, some of the key steps to address risks in our supply chain include:

- Rolling out Modern Slavery training to our key suppliers.
- Collaborating with Fast Forward to establish the Brand Associate programme for SME partner brands manufacturing in the UK.
- Initiating due diligence in our inbound freight supply chain in partnership with the International Transport Workers' Trade Union Federation.

I extend my gratitude to our partners, including our customers, suppliers, human rights organisations, audit bodies, and trade unions. Their support is crucial for safeguarding worker's rights and mitigating modern slavery risks in our supply chain.

In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I have the authority to bind ASOS plc, by order of the Board.



José Antonio Ramos Calamonte

CEO

21st October 2024

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Human Rights Strategy

Identifying our salient Human Rights issues

To ensure our approach to human rights addresses our most relevant risk areas, we commissioned an independent expert to review the salient human rights risks in our value chain in FY23. Our salient human rights risks are those with the highest likelihood of occurring and that have the most severe negative impacts on people across our value chain. Understanding our salient issues helped us to prioritise risks and has informed our work to prevent, mitigate, and manage human rights impacts in FY24.

Our salient Human Rights issues

The most salient risks identified in our own garment supply chains are:

Forced Labour (Modern slavery)	Freedom of Association	Wages and Benefits	Gender Empowerment
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Addressing our salient Human Rights issues

Our aim is to protect the human rights of all individuals involved in the manufacture of our products. Our strategic actions to deliver this commitment map directly against our most salient human rights risks:

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 the factory level to empower women workers in our supply chain.
Building on a foundation of effective own-brand and partner-brand due diligence			
For ASOS own-brands and labels, review and enhance current due diligence mechanisms, and introduce a global grievance model with the aim of maximum accessibility, transparency, confidentiality, and enhanced remedy for workers.			
Ensure that partner brands sold on our platform are committed to transparency. Continue to engage all partner brands to map and share their factory lists in line with industry best practice.			

We recognise that as both internal and external contexts evolve, our risk exposure changes accordingly, necessitating adjustments to our strategy. We will continue to adapt our approach to reflect these shifts and to incorporate lessons learnt as we implement our programmes.

For full details of our Fashion with Integrity Strategy please head to asosplc.com/fashion-with-integrity.

Due Diligence

We employ a comprehensive due diligence process to assess and mitigate potential human rights risks within our ASOS own-brand and labels supply chains, ensuring adherence to our code of conduct. We have also started to embed human rights due diligence into our Goods Not for Resale (GNFR) supply chains to identify and address risks.

In line with our multi-stakeholder due diligence strategy, we value the insights from suppliers, factories, trade unions, and civil society organisations. Our ongoing partnership with Anti-Slavery International, initiated in 2022, underscores this

commitment. As the world's oldest human rights organisation, Anti-Slavery International has been a pivotal 'critical friend' since 2017, offering invaluable support and expertise in combating modern slavery risks in our supply chain.

Risk Mapping

Goods for resale – ASOS own-brands and labels: ASOS' approach to risk assessment comprises desk-based research, supply chain mapping, auditing, and stakeholder engagement to assess actual and potential human rights impacts. Our audit programme identifies risk across our manufacturing (Tier 1 and 2) suppliers against our Supplier Ethical Code and local law.

Goods for resale – partner brands: Under our Branded Engagement programme, we take a risk-based approach to prioritise actions for managing supply chain risks for our branded partners. Our ASOS Self-Assessment Questionnaire (SAQ) and other due diligence measures help us map and identify high-risk sourcing areas where our partners manufacture. We use the Open Supply Hub to access partner factory lists and internal intake data to identify high-risk regions for partner brand items sold on ASOS. This enables us to monitor and engage with brands in those regions, where we promote alignment with industry initiatives and [stakeholder partnerships](#) to enhance human rights due diligence through our corrective action plans. We also monitor adverse media and engage with stakeholders to resolve issues when identified, ensuring continuous improvement through proactive risk-based due diligence.

Goods not for resale (GNFR): Mapping risk in various GNFR sectors helps us identify those at a heightened risk of modern slavery. In collaboration with Anti-Slavery International, we have researched cleaning, security, warehousing, last-mile delivery, and inbound freight companies. These insights allow us to focus our efforts on areas where risks are greatest. Our new partnership with Unseen gives us access to its business portal and has enhanced our risk identification capabilities. We can identify emerging themes from the modern slavery helpline, which supports risk prioritisation.

Policies and Contractual Controls

Goods for resale – ASOS own-brands and labels: As part of our Human Rights programme, we have implemented a range of policies and guidelines designed to ensure the respect and protection of workers throughout our supply chain. These policies are contractually binding, supporting us in effectively managing supply chain risks and outlining remediation steps when issues arise.

Goods for resale – partner brands: We ensure our partners align with our Partner Brands Ethical Trade Policy which outlines the standards and responsibilities brands must implement throughout their supply chain and for products supplied to ASOS.

The following policies are publicly available:

- [ASOS Anti-Slavery and Human Trafficking Policy](#)
- [ASOS Child Labour, Remediation, and Young Worker Policy](#)
- [ASOS Policy on Gender Equality in the Supply Chain](#)
- [ASOS Freedom of Association and Collective Bargaining Policy](#)
- [ASOS Homeworking Policy](#)
- [ASOS Migrant Workers Policy](#)
- [ASOS Responsible Exit Policy](#)
- [Global Framework Agreement with IndustriALL](#)
- [ASOS Third-Party Brands Ethical Policy](#)

Standard Operating Procedures

Goods for resale – ASOS own-brands and labels

Audits and remediation: Our audit programme is used to identify, assess, and address risks throughout our supply chain, including those related to modern slavery. We employ a combination of our in-country teams and third-party audit providers to identify risks at the factory level and assess adherence to our Human Rights policies and standards. In FY24, our primary audit providers included RSC (International Accord), The Reassurance Network, ELEVATE, Sustainable Compliance Management, Depth Consultancy, and RK Consultancy. Additionally, we collaborate with ILO Better Work, which operates in-country programs in Bangladesh, Cambodia, and Vietnam to improve compliance in our factories through assessments. ILO Better Work also offers advisory and training sessions in Madagascan factories supplying ASOS.

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

Access to remedy (whistleblowing): Country-specific helplines and access to remedy are present in our supply chain to support workers, including the RSC (International Accord) in Bangladesh and the Migrant Resource Centre in Mauritius. In the last reporting period, we addressed a total of 23 whistleblowing cases from Bangladesh, China, Mauritius, Morocco, Turkey, and the UK. Out of these, 17 cases have been resolved, while investigations into the remaining cases are still ongoing. The reported issues included unfair dismissal, health and safety concerns, and wage disputes. We are collaborating with our partners and suppliers to investigate the ongoing cases and will implement appropriate remediation plans and preventative measures as needed.

Goods for resale – partner brands

Self-Assessment Questionnaire (SAQ): Since September 2023, we've required brand partners to detail their approach to mapping, monitoring, and assessing their supply base in our SAQ. This includes explaining the measures they've taken to mitigate modern slavery and human trafficking risks, evidence of training, and sharing their modern slavery statements (where relevant) to ensure compliance with our minimum requirements. The SAQ supports brand partners to improve their processes, with additional support for SME brands.

Higg BRM: We accept the Worldly Higg Brand Retail Module (BRM) from Cascale members as an additional self-assessment and conduct regular conversations with partners and desktop reviews.

High-Risk Brands: For brands we deem to be higher risk, we perform enhanced due diligence including reviews of audits, corrective action plans, purchasing practice memberships, and approaches to subcontracting.

Governance (previously risk assessment and management)

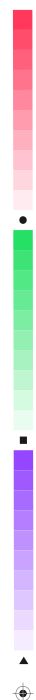
We maintain a continual cycle of risk and opportunity identification and response throughout our day-to-day decision-making and operations. As set out in our Enterprise Risk Management Policy and Standard, our Board and our Management Committee are responsible for overseeing and managing the risks across our Group. To help them achieve this we have captured our complete risk universe in the ASOS Risk Taxonomy within our Risk Management Standard. The Board has set the appetite for each category of our Risk Taxonomy enabling us to apply the right level of control and assurance for each category. The taxonomy includes categories such as "FWI Strategy and Programme Management", "Ethical Trade (including supplier management)" and "Ethics, Conduct and Integrity." Mapping risks against our taxonomy allows us to collate, share and escalate risk information across ASOS.

ASOS' Internal Audit & Risk function is responsible for establishing and maintaining the company-wide risk framework, supporting the business in risk management activities and providing objective assurance over risk controls and mitigations. Risks are regularly reviewed and updates to our principal risks, including "Ethical Trade Issues in Our Supply Chain", are reported to the Audit Committee biannually, and are presented in our Annual Report & Accounts.

This Year's Key Updates










Business Area	Key Updates
<p>Goods for resale (own-brand and labels)</p>	<p>Training: In the last reporting period, we launched modern slavery training for our key suppliers. The training addresses salient risks within the fashion industry, current and upcoming legislation, ASOS' expectations of our suppliers, and the steps to take if modern slavery is detected. The training will be updated annually to remain in line with the evolving legislative landscape. 65% of key suppliers had completed this training by the end of August 2024.</p> <p>Collective bargaining agreement (Cambodia): We have signed a legally binding agreement to support collective bargaining for workers in Cambodia's garment and footwear sector. This agreement, established between ASOS and IndustriALL Global Union with the support of ACT (Action, Collaboration, Transformation), covers commitments on labour costing, country volumes, and support for training and skills development. It will apply to ASOS garment factories that adopt the Collective Bargaining Agreement template with IndustriALL.</p> <p>China: During summer in China, children often visit their employed parents at work, and young workers pursue internships, which can pose child labour risks. In collaboration with The Centre for Child Rights and Business, our child labour remediation partner in China, we have distributed a guide detailing legislation, risks, and responsible summer recruitment protocols for factories. This guide has been distributed to 52 suppliers in China to enhance awareness and ensure responsible recruitment practices.</p> <p>In partnership with Assists Labour Service, we launched The Friendly Workplace Project at a Chinese knitwear factory to foster gender equality and combat discrimination and sexual harassment. The initiative, spanning from July 2021 to January 2024, involved four key phases: needs assessment, policy formulation, worker training, and evaluation. Despite COVID-19 delays, the program educated factory managers and workers, leading to enhanced awareness, the creation of guidelines for handling complaints, and the integration of an anti-harassment policy into employee handbooks.</p> <p>This financial year, we have conducted Human Rights induction trainings for newly-onboarded China-based factories and suppliers, focusing on the UK Modern Slavery Act's fundamentals and measures to prevent modern slavery.</p> <p>As a signatory to the Coalition's Call to Action to End Forced Labour in Uyghur Regions, we have upheld our responsibilities in ethical sourcing and conducted thorough due diligence when onboarding new factories. In the last reporting period, we suspended the onboarding of two Chinese factories with parent company links to Xinjiang.</p> <p>India: We continued our work with GoodWeave International, a non-profit organisation that promotes transparency in global supply chains through mapping; remediation; and preventative local community and workplace interventions focused on child, forced, and bonded labour. The initial phase of this partnership focused on supporting three of our suppliers based in India. During this financial year, we continued the project with two of these suppliers, carrying out deeper supply chain mapping. Between March and July 2024, 30 audits were conducted at subcontracted worksites within their supply chains. Two findings were identified linked to the working hours of young workers, which are being remediated collaboratively by the suppliers and GoodWeave.</p> <p>Bangladesh: In March 2023, we extended our partnership with GoodWeave to include our Bangladesh supply chain. The project has provided a comprehensive evidence-based analysis of the risk, prevalence, and root causes of modern slavery in the garment industry in the country. Seven production sites in our supply chain have been assessed, including three from Tier 1 and four from Tier 2. Over 100 workers have been interviewed during the process and we will be working with GoodWeave through the next financial year to action the recommended improvements.</p>
<p>Goods for resale (brand partners)</p>	<p>UK brand engagement – Fast Forward: In May 2024, Fast Forward launched the Brand Associate programme, a new initiative devised collaboratively by Fast Forward, ASOS, and other brands to address ethical challenges encountered by UK SME brands with a turnover under £36 million. The programme provides step-by-step guidance for brands to enhance their understanding of what constitutes decent work and how they can operate with accountability and transparency to level the playing field. The programme extends the partnership between ASOS and the Fast Forward programme, which ASOS co-founded in 2014.</p> <p>Brand learning and development: In 2024, we launched the FWI Brand Partner Learning Hub, a comprehensive resource centre for our brand partners to access learning materials on topics including the importance of clear policy, transparency, auditing and corrective action plans, and how to identify and remediate modern slavery related risks. Developed with input from our critical friend, Anti-Slavery International, the Hub aims to support our brand partners in developing and implementing best practices in the management of their supply chains.</p>

Business Area	Key Updates
<p>Goods not for resale</p>	<p>Supply chain: Our Procurement and Human Rights teams have worked collaboratively to revise our Self-Assessment Questionnaire (SAQ) for our third-party logistics providers (3PLs) and fulfilment centres. To support the implementation of the revised SAQ, we have also developed a Warehousing Social Standard that addresses the priority risk areas. The work was completed with the support of ASI, whose research into global warehouse operations helped identify potential risks. The revised SAQ and Warehousing Social Standard will launch in FY25.</p> <p>In July 2024, we launched a new partnership with the International Transport Workers’ Trade Union Federation (ITF). This marks the first step in conducting due diligence in our inbound supply chain, specifically sea freight. We have shared our FY23 shipping data with ITF to commence the Human Rights Due Diligence Health Check, which will provide insights into the treatment of seafarers within our inbound freight supply chain.</p> <p>Service providers: In FY24 we started the process of risk prioritisation across the service providers within our ASOS offices. Research conducted by the ASOS Human Rights team and ASI highlighted the sectors at a heightened risk of modern slavery and a project model has been developed to form the basis of an internal pilot programme to conduct human rights due diligence.</p> <p>Procurement: In January 2024, Anti-Slavery International hosted a training session for the ASOS Procurement team to raise awareness about human rights and the risks of modern slavery in GNFR. Anti-Slavery International is finalising an ASOS Procurement RFP Guidance document, which includes questions on human rights and modern slavery, along with sector-specific risk profiles featuring more detailed, sector-specific questions, which will support the Procurement team in understanding the key risks in the sectors they work in. This is due to launch in early FY25.</p> <p>Unseen: In May 2024, ASOS launched a new partnership with Unseen. We have gained access to Unseen’s business portal, which allows us to monitor all cases reported through the modern slavery helpline, heightening our due diligence approach to modern slavery across the business.</p>



Our Partnerships

Collaboration is a crucial component of industry change hence partnerships are integral to our risk mitigation efforts. Our partners are detailed below. For more information, please visit our PLC site [here](#).

Partner organisation	Who they are	How we work together
	The Centre for Child Rights and Business supports companies to promote and respect children's rights in all their operations in their supply chains.	The Centre helps facilitate our child labour and remediation policy and organises workshops for factories on child rights and gender equality.
	A partnership between the United Nations' International Labour Organisation and the International Finance Corporation, uniting stakeholders to improve working conditions in the global apparel and footwear industry.	In Pakistan, Cambodia and Vietnam, we require eligible factories to enrol in the Better Work Programme. In Bangladesh participation is optional but encouraged.
	Fifty Eight conducts research and develops technology solutions to help achieve good work for everyone, free from exploitation.	Fifty Eight provide the technology for our worker rights and pre-departure training app and the Just Good Work app.
	The Fashion Workers Advice Bureau Leicester (FAB-L) is a community-run initiative focused on positively impacting garment workers by offering free support on workplace and welfare issues.	ASOS co-funds FAB-L and fosters relationships between their representatives, trade unions and our UK factories to facilitate worker access to their support services.
	Anti-Slavery International is a non-governmental organisation, charity and advocacy group working exclusively against slavery.	Our 'critical friend' partnership provides guidance and supports the delivery of our Fashion with Integrity programme.
	Human Level is an advisory services firm that empowers companies to be human rights proactive in a changing climate.	Human Level conducted our human rights saliency risk assessment which informed our FWI Strategy.
	A tripartite initiative of the Bangladesh RMG Industry, brands and trade unions that conducts safety inspections, training, and operates an independent worker safety and health complaints mechanism.	In Bangladesh, we exclusively work with RSC-certified factories.
	Fast Forward is a UK labour standards education, audit, and improvement initiative operated by Stronger Together, designed to support all businesses in the supply chain to collaborate and improve.	ASOS is a founding member of Fast Forward, and all our Tier 1 to 3 UK factories are audited using their audit methodology. Our UK-sourcing brand partners are also required to join the programme.
	IndustriALL is a global union representing 50 million workers in 130 countries, fighting for better working conditions and trade union rights in the mining, energy, and manufacturing sectors.	We have an ongoing Global Framework Agreement (GFA) with IndustriALL, first signed in 2017. The GFA helps safeguard worker's rights to freedom of association and collective bargaining.
	The Trades Union Congress is a national trade union centre, a federation of trade unions that collectively represent most unionised workers in England and Wales.	The TUC, GMB Midlands, and Unite East Midlands created a Workplace Support Agreement (WSA), to access our factories and workers within them, and strengthen industrial relations in the Leicester garment sector.

Partner organisation	Who they are	How we work together
	GoodWeave is a non-profit that partners with companies to bring visibility to supply chains, protect workers' rights, and provide assurance that products are free of child, forced and bonded labour.	GoodWeave works with ASOS in Northern India and Bangladesh, to assess and address risks of child and forced labour in select garment supply chains.
	ACT is an agreement between global brands and IndustriALL Global Union in pursuit of living wages for workers in textile, garment, and footwear supply chains.	As an ACT signatory we are working to ensure our purchasing practices enable suppliers to improve wages and working conditions.
	A free interactive mobile app, giving jobseekers and workers critical information and advice on the journey to work, from recruitment to employment and life in a new destination, moving on, or returning home.	We have introduced the JGW app in our factories in Mauritius, to inform migrant workers of their rights throughout the recruitment process and during their stay.
	MRA (Mobilising for Rights Associates) is an international non-profit that works across North Africa to advance women's rights, emphasising grassroots changes and collaborating with youth-led NGOs.	In Morocco, we formed a nationwide network of grassroots women's organisations and are piloting a programme on female empowerment in our factories with MRA.
	KADAV empowers women in Turkey affected by violence and discrimination, guiding them to support networks and safeguarding them from harm.	KADAV helps facilitate our child labour and remediation policy and conducts risk assessments.
	The Bangladesh Accord, established in 2013, transformed factory safety, empowered workers to refuse unsafe work, saved lives, and supported union rights. In 2023, it expanded to Pakistan.	ASOS is a signatory of the International Accord. We mandate that our factories in Bangladesh and Pakistan are members of the programme.
	Unseen is an anti-slavery charity based in the UK. It provides safehouses and support in the community for survivors of trafficking and modern slavery. Additionally, it also runs the UK Modern Slavery and Exploitation Helpline.	Our partnership provides ASOS with access to Unseen's modern slavery portal, enabling us to monitor and address any reported cases of modern slavery linked ASOS.
	The International Transport Workers' Trade Union Federation (ITF) is a democratic, affiliate-led federation, recognised as the world's leading transport authority.	Our partnership with the ITF allows us to work together on improving the safety, resilience, and sustainability of our transport supply chains.

Assessment of Effectiveness

To address the risks of modern slavery, forced, and child labour that ASOS may cause, contribute to, or be directly linked to, we implement various processes and procedures. We monitor the effectiveness of these actions by tracking key performance indicators, such as the completion rates of Human Rights training modules, and the number of whistleblowing cases and grievances reported and solved globally. External input is crucial to our assessment, and our partnerships are explained throughout this statement. Notable examples include the human rights salience risk review conducted by an external advisory firm, which underpins the strategic direction of our Human Rights programmes, and our 'critical friend' relationship with Anti-Slavery International, providing external accountability and independent advice. Our ASOS own-brand and labels supplier contracts mandate compliance with our Human Rights Policies, covering child and forced labour, and are available on our PLC site. Using the outcomes of these processes, we will refine and enhance our actions to continually improve our response to modern slavery.

Our Forward Commitments

While we take pride in our progress and accomplishments over the past year, we understand that there is still much to be done. In the upcoming financial year, we will further enhance our strategies to address the risks of modern slavery and other human rights abuses within our business and throughout our supply chain.

In FY24 we extended the scope of our work to include our Goods Not for Resale (GNFR) footprint. This growth will continue in the next financial year, as we develop our new partnerships to drive sector-specific due diligence. We also plan to pilot a project model for service providers, that will form a bottom-up approach to due diligence. Our work on warehousing will continue to develop, with a focus on assessing and understanding risk through the launch of our revised SAQ and Warehousing Social Standard. From a Good-for-resale perspective, we continue to advance our gender empowerment programme. Further details of this work are available in our FY24 annual report and in our Fashion with Integrity: Strategy Update on asosplc.com/fashion-with-integrity.

For our brand partners, we will continue to prioritise our thorough due diligence throughout the brand onboarding process, lifecycle management, and beyond. This will be achieved through the rollout of our FY25 SAQ. Additionally, we will engage with key internal stakeholders and external partners to foster collaboration and drive industry-wide change.

This statement was prepared in accordance with the Modern Slavery Act 2015 and the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act and has been approved on behalf of the ASOS Board of Directors on 21st October 2024 and signed on its behalf by:



José Antonio Ramos Calamonte

CEO

21st October 2024

Appendix

ASOS in Canada:

Gross Sales Units FY24

ASOS own-brands and labels, and partner brands	344,748
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