



ASOS

Modern Slavery Statement

September 2022 – August 2023



Updated on 29th May 2024 to ensure compliance with the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act

Additions:

- Supply Chain Mapping
- Salient Human Rights Risks in the ASOS Value Chain
- Assessment of Effectiveness
- Appendix – ASOS in Canada

Foreword

Modern slavery and forced labour are complex global issues affecting all regions, sectors, and economies. As an international business, we accept the dual responsibilities that we have: first, to conduct the necessary due diligence to tackle the risks in our own supply chain; and second, to collaborate with others to drive transparency and systemic change across the industry and beyond. Each is vital to ensure that people who have been forced into situations of vulnerability can be protected from exploitation and enjoy the right to decent work and safety.

We are proud of the progress we've made to mitigate the risk of modern slavery in our supply chain and to engage with industry peers on this important topic. As we prepare for the forthcoming mandatory human rights and environmental due diligence legislation, we recognise we will need to continue to evolve our approach to meet the additional requirements this will place on all businesses. This legislation represents a significant step towards a level playing field in the industry, which is fundamental to driving progress in the fight against modern slavery.

This statement complies with the UK Modern Slavery Act 2015 and is our first report published in accordance with the 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 2022 to August 2023.

Over the period covered by this statement, we took some key steps to address risk in our supply chain, including:

- Conducting a human rights saliency assessment.

- Launching our Gender Equality in the Supply Chain Policy.
- Launching our internal business-wide modern slavery training.
- Developing our human rights strategy for launch in early 2024.

I would like to thank all our partners, including our customers, suppliers, local and international human rights organisations, audit providers and trade unions, without whom our work to protect the rights of workers in our supply chain and address the risk of modern slavery wouldn't be possible.

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 or entities 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

José Antonio Ramos,
CEO

29th May 2024

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About ASOS

ASOS is a destination for fashion-loving 20-somethings around the world, with a purpose to give its customers the confidence to be whoever they want to be. Through its app and mobile/desktop web experience, available in nine languages and in over 200 markets, ASOS customers can shop a curated edit of nearly 50,000 products, sourced from nearly 900 global and local third-party brands alongside a mix of fashion-led own brand labels.

Business Structure

ASOS is based in the UK, with its head office in London, a smaller technology office in Birmingham, a Customer Care hub in Leavesden, and a technology office in Belfast, Northern Ireland. We also currently have four third party run fulfilment centres (Barnsley, UK; Berlin, Germany; Atlanta, USA; Lichfield, UK) and three third party operated returns and reprocessing sites across Poland and the UK.

Our offices:

As of 31st August 2023, we had **3078** permanent employees in our own operations.

Our fulfilment centres (3PLs) (third-party operated)

(figures correct as of 31/08/23):

- **3735** Barnsley (3028 permanent, 707 agency)
- **605** Lichfield (605 permanent, 0 agency)
- **1023** Atlanta (1023 permanent, 0 temporary)
- **2367** Berlin (2151 permanent, 216 temporary)

Our other sites (figures correct as of 09/10/23):

- **780** Poland (312 permanent, 468 temporary)
- **587** Doncaster (391 permanent, 196 temporary)

ASOS at a glance:

- **23.3m** active customers
- **83.7m** shipped orders
- **50,000** products available to buy at any one time
- Over **900** brand partners
- **17** own brands and labels

Goods for Resale – ASOS Own Brand

Our supply chain is a complex, global network of manufacturers and suppliers. Each of these parties must abide by the values and standards set out in the ASOS code of conduct and policies. Our code of conduct and policies stipulate that manufacturers must uphold decent labour standards in line with the UN Guiding Principles on Human Rights. Products created under ASOS own brands and venture brands are designed in-house, manufactured by third-party supplier factories, and then sold through our platforms and wholesale partnerships.

We source from:

- **25** countries ((tier 1-3)). Link to our interactive supply chain map: Open Supply Hub.
- **892** factories (tiers 1-3) involving **278,152** workers through **196** suppliers
- Total male workers: 47%
- Total female workers: 53%

ASOS defines our tiers as follows:

Tier	Tier definition	Tier processes
Tier 1	Finished product manufacturing and shipping to ASOS	Cut make trim (CMT); garment stitching; sewing; product assembly; lasting
Tier 2	Subcontracted site for finished product manufacturing	Cut make trim (CMT); garment stitching; sewing; product assembly; lasting
Tier 3	Enhancement to product	Additions to product e.g. printing (final product), embroidery, trim attachment, embossing, garment piece dyeing, laundry etc
Tier 4	Fabric and components	Fabric mills, tanneries, hardware and trims
Tier 5	Raw materials	Textile fibres, natural and manmade materials

Supply Chain Mapping

Improving visibility of our supply chain is an important part of our Fashion with Integrity strategy and is fundamental to realising our commitment to respect, protect and champion the human rights of all who encounter ASOS operations. We have mapped our supply chain to Tier 3 (manufacturing level), which is publicly available to access in the form of an embedded downloadable factory list and [interactive map](#) on our PLC site powered by the Open Supply Hub. We are working to establish a complete geographical map of our supply chain, down to the raw material level, however, there are barriers to achieving this as obtaining information becomes increasingly difficult as we move further upstream in the value chain.

Goods for Resale – Partner Brands

We have over 900 partner brands on our platform, accounting for c.60% of our business in FY23. Working with a diverse portfolio of brands, from large multi-national corporations through to small-medium size enterprises, our Branded Engagement team take a proactive approach to ensure that our partners are aligned with ASOS' approach and expectations. It is our responsibility to work with these partners to continually improve transparency to help us to identify and mitigate the risk of modern slavery in our extended supply chains.

Since March 2022 we have strengthened our approach to branded supplier due diligence, introducing additional minimum requirements into our screening processes for new and existing brand partners such as commitment to the [Transparency Pledge](#), which asks our partners to agree to publicly disclosing their supply chains on either their own website or via the Open Supply Hub by 2025 at the latest.

In addition, all new brands being on-boarded into the business are asked to provide us with evidence of their Ethical Trade policy and how they implement this within their supply chain. We also ask our partners to share with us detail around how they ensure that their suppliers meet the requirements of their policy, and the approach that they take with those who fail to do so.

Existing brands are expected to complete a self-assessment questionnaire annually and update us with any changes to their business practices.

Goods Not for Resale – Procurement

Procurement plays an instrumental role in our day-to-day business operations and delivery and supports our wider Fashion with Integrity strategy. Our responsible procurement covers non-stock goods and services, including outsourced customer deliveries, logistics, technology, marketing, property, cleaning, and catering.

Vendors are grouped under the following main categories:

- Supply Chain & Logistics
- Technology
- Marketing
- Property and Facilities Management
- General Services

Last year we transacted with:

- 1,216 non-stock suppliers

Due Diligence

At ASOS, we use a systematic due diligence approach to evaluate, identify, and address any potential human rights risks in our own-brand supply chains. This helps us ensure that our code of conduct is implemented properly. We recognise that without appropriate processes, our procurement and supply chain is vulnerable to modern slavery. Therefore, due diligence to mitigate and where appropriate, remedy such risks forms the core of our ways of working with suppliers.

We adopt a multi-stakeholder approach in our due diligence process, considering the perspectives of suppliers, factories, trade unions and civil society organisations. To this extent, in 2022 we announced a three-year partnership with Anti-Slavery International. Anti-Slavery International is the world's oldest human rights organisation and has acted as our 'critical friend' since 2017. The partnership provides us with support, guidance, and advice on how to meaningfully address the risks of modern slavery within our supply chain.

Our approach to due diligence will continue to evolve in future as we work to meet forthcoming legislation, including the Corporate Sustainability Due Diligence Directive, which ASOS publicly supported prior to its publication. By introducing due diligence requirements for businesses, this legislation will help create a level playing field and ensure all businesses are working to address their risks and impacts.

Due diligence tools used to support our commitment include:

- Policies and contractual controls.
- Robust standard operating procedures, including:
 - Factory audit programme
 - Training and workshops for suppliers, partners and internal stakeholders.
 - Access to remedy and whistleblowing reporting
- Risk Management and Internal Audit programmes.

Policies and Contractual Controls

As part of our Ethical Trade programme, we have developed several policies and guidelines to ensure workers are respected and protected across our supply chain. For our supply chain, our policies are contractually binding, helping us to manage the risks in our supply chain and to set out remediation steps when issues are found.

We continually review and update our policies and guidelines to ensure they achieve the right results. The following policies are publicly available.

- [ASOS Child Labour Remediation and Young Worker Policy](#)
- [ASOS Policy on Gender Equality in the Supply Chain](#)
- [Freedom of Association and Collective Bargaining Policy](#)
- [Homeworking Policy](#)

- [Migrant Workers Policy](#)
- [Responsible Exit Policy](#)
- [Global Framework Agreement with IndustriALL](#)
- [Anti-Slavery and Human Trafficking Policy](#)
- [Third-Party Brands Ethical Trade Policy](#)

Anti-Slavery and Human Trafficking Policy: In 2023, we launched our Anti-Slavery and Human Trafficking Policy which was written in conjunction with Anti-Slavery International. This is an overarching policy that draws on and signposts to our modern slavery related commitments already outlined in our other policies and outlines the remediation process should any violations occur.

Standard Operating Procedures

Audits: Our audit programme is one mechanism that we use to identify, assess, and address risks throughout our supply chain, including modern slavery risks. We're mindful of the limitations and subjectivity of audits. Our audit programme is a critical enabler in the discovery and management of modern slavery risks throughout our supply chain, and something we continue to prioritise.

We use a combination of our own in-country teams and third-party audit providers to identify risk at factory level against our ethical trade policies and standards. Our key audit providers are The Reassurance Network, ELEVATE, Sustainable Compliance Management, Depth Consultancy and RK Consultancy. Another key partner of ours is ILO Better Work, which runs in-country programmes in Bangladesh, Cambodia, and Vietnam to improve compliance in our factories through assessments. ILO Better Work also runs advisory and training sessions in our factories in Madagascar.

Training: We want to make sure that our commercial teams and suppliers are adhering to high standards, and this is achieved in part by aligning our and our supplier's practices through training on ethics and integrity in business. Training and workshops play a significant role in achieving this by equipping our suppliers and commercial teams with the tools to effectively identify and address issues and ensure that practices respect human rights. Training is a continuous process that helps us instil ethical purchasing practices through capacity building. As more employees become aligned with the priority of identifying and preventing human rights violations, we gain increased visibility and accountability, purchasing practices are enhanced, and the risks associated with modern slavery and human rights abuses are mitigated.

In the last reporting period, we engaged with The Centre for Child Rights and Business to conduct a two-day workshop on harassment awareness and prevention (HAP) in a factory in China supplying our products where risks of harassment had been identified. The workshop covered the basic concepts of workplace harassment, its detrimental effects, and practical steps for prevention. The factory has since implemented a zero-tolerance policy and added anti-harassment policies to staff handbooks, with biannual training planned for long-term prevention.

Between October 2022 to August 2023, we encouraged our suppliers and their factories to participate in online training offered by the ILO Turkey office as part of the ILO Programme "More and Better Jobs for Women: Empowerment Through Decent Work". A total of 30% of our Tier 1 factories in Turkey took part in the "Zero Tolerance to Violence" training which focused on the different forms of violence, the negative

impact it has on work life and international conventions such as ILO Convention 190 around preventing gender-based violence in all aspects of life. 34% of our Tier 1 factories participated in the "I Support Equality" training, which aimed to enhance the trainee's knowledge of gender equality, the consequences of gender-based discrimination, and the importance of ensuring gender equality in the workplace. 53% of the participants scored higher in the final assessment as compared to pre-programme assessment, indicating an increase in awareness.

Access to Remedy (Whistleblowing): Country-specific helplines are present in our supply chain to aid workers. These helplines include the Accord (RSC) in Bangladesh and the Migrant Resource Centre in Mauritius.

In the last reporting period, we processed a total of 26 whistleblowing cases from Albania, Bangladesh, China, India, Romania, Turkey and the UK. Out of these, 18 cases have been resolved, and investigations into the remaining cases are ongoing. Issues reported included harassment, health and safety and wage-related disputes. We are taking the necessary steps to investigate the remaining ongoing cases, by liaising with our partners and suppliers on the ground. We will subsequently implement appropriate remediation plans and preventative measures.

Risk Assessment and Management

At ASOS we maintain a continual cycle of risk and opportunity identification and response throughout our day-to-day decision-making and operations. 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. This includes "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 are responsible for establishing and maintaining the company-wide framework, for supporting the business in risk management activities and for providing objective assurance over risk controls and mitigations. Risks are regularly reviewed and 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.

Salient Human Rights Risks in the ASOS Value Chain

Salient Risk Review of Human Rights Risks

In 2023, we commissioned an expert third party to conduct a human rights salience risk review of our value chain, which will serve as the basis for our Human Rights Strategy. The assessment established that the risks of child and forced labour are most prevalent in our upstream value chain, and indirect procurement and downstream value chain. Mapping our salient areas has facilitated the prioritisation of risk and informed our strategic workstreams to prevent, mitigate and manage risks in FY24.

This Year's Key Updates

Business Area	Key Updates
Own Operations	<p>Modern Slavery Internal Training: In May 2023, we rolled out a company-wide compulsory training module on Modern Slavery. The course provides a comprehensive introduction to modern slavery, its scope within the fashion industry and how ASOS are tackling this, and what one should do if they feel someone may be a victim.</p> <p>It was integral for us that the module was mandatory, given the prevalence of modern slavery within the industry. Each year, it will be updated to inform on changes both in the external legislative landscape and internal operations.</p>
Goods for Resale (Own-Brand)	<p>Transparency: Transparency is one of our core Fashion with Integrity pillars. We share factory information with our customers and other stakeholders through our public factory list and on the Open Supply Hub, which is updated quarterly to ensure the most up-to-date data is published and reflects Tiers 1-3 of our supply chain. By disclosing this information, we hope to encourage greater openness and accountability across the fashion industry.</p> <p>In March 2023, we embedded our interactive supply chain map from Open Supply Hub onto our PLC site, to facilitate easier access to our transparency commitments from a centralised platform. https://www.asosplc.com/fashion-with-integrity/people/our-supply-chain/</p> <p>This year, we continued our participation in Fashion Revolution's Fashion Transparency Index, achieving a score of 50% in the 2023 report and ranking joint 31st out of the 250 major fashion brands and retailers reviewed in the Fashion Transparency Index 2023.</p> <p>China: As part of our ongoing monitoring in this reporting period, we uncovered one case of child labour in our Chinese supply chain. Working with our local partner The Centre for Child Rights and Business (The Centre), we implemented our established child labour and remediation policy. This covers the schooling of the child, the payment of a living wage to their family, and close monitoring of the child to ensure their wellbeing. This year we also entered the fourth year of our sustainable education sponsorship for a child in college with the support of The Centre.</p> <p>We continued our partnership with The Centre, our remediation partner in China, and conducted a pre-assessment and two-day workshop for 23 members of factory management and 61 frontline workers in an eyewear factory between October and December 2022. The purpose of this was to educate participants on the detrimental effects of workplace harassment on victims, the potential harm to the business, and the legal policies on workplace harassment by introducing the basic concepts of sexual harassment in the workplace and the different types of workplace harassment. As a result, the factory has now taken a stronger preventative approach to sexual harassment by implementing a zero-tolerance policy; establishing an anti-harassment zero-tolerance policy advocacy board; increasing protection in the complaints procedure for employees, clients, and third parties; integrating an anti-harassment policy into staff handbooks; providing guidance for new staff onboarding; providing notice to candidates on the anti-harassment policy; and arranging anti-harassment training twice a year.</p> <p>As a brand signatory to the Coalition's Call to Action to Exit the Uyghur Region and responsible sourcing, we have continued to work to meet our associated commitments. Over the last reporting period, we have withheld the onboarding of two factories in Cambodia due to parent company links to Xinjiang.</p> <p>UK: In the UK, we have continued our partnership with the Fashion Workers Advice Bureau (FAB-L), a community-run initiative, funded by brands including ASOS and trade unions. The centre is focused on making a positive impact on the lives of workers by offering free support on a range of issues including workers' rights. In the past year, the centre has employed two new support staff: one to deliver social welfare rights advice and another focused on Eastern European community engagement, both funded by the Leicester Garment Workers Trust.</p> <p>We have also begun to introduce FAB-L and GMB union representatives to our UK factories to build relationships with suppliers and workers, as part of our workplace support access agreement with the GMB union. During factory visits from FAB-L and GMB representatives, workers can learn about the services FAB-L can offer them and the benefits of joining a trade union.</p> <p>International Accord: The implementation of the Bangladesh Accord (RMG Sustainability Council) over the last decade has seen over 40,000 inspections carried out, over 500 factories remediated and nearly 700 grievances resolved. This success has seen the extension of the Accord into Pakistan.</p> <p>ASOS has signed the Pakistan Accord, alongside other brands. The current factory scope covers nearly half a million workers. The Accord will work alongside brands, unions, and representatives in the country (e.g., Fire Protection Association of Pakistan, National Engineering Services Pakistan, and Department of Labour and HR in Punjab; amongst others) to establish a common set of minimum requirements to assess fire and building safety in Pakistan.</p>

Business Area	Key Updates
<p>Goods for Resale (Own-Brand)</p>	<p>The main objectives of the Accord are:</p> <ul style="list-style-type: none"> • To adapt the 2013 Accord building standards from Bangladesh • To integrate local fire, building and boiler safety codes • To agree with provincial governments of Punjab and Sindh • To raise awareness among manufacturers of the Accord standards and remediation solutions <p>In Bangladesh we continue to work with International Accord and RMG Sustainability Council to monitor and promote the safe working conditions in our supply chain.</p> <p>Purchasing Practices Survey (ACT): As a signatory of ACT (Action Collaboration and Transformation on Living Wages), ASOS has pledged to implement a set of commitments on purchasing practices to facilitate progress to the payment of living wages in our supply chain. We conducted assessments of our progress towards these commitments in 2021 and completed a second round of surveys in 2023. We are currently awaiting the publication of ACT's report on the aggregate findings of the surveys, which will help us identify ways to better support our suppliers in pursuing a living wage for workers.</p> <p>GoodWeave: In December 2022, ASOS 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. In March 2023, we extended our partnership with GoodWeave to include our Bangladesh supply chain. The project will provide a comprehensive evidence-based analysis of the risk, prevalence, and root causes of modern slavery in the garment industry in the country.</p> <p>Our partnership with GoodWeave will strengthen our existing efforts to combat child labour and modern slavery. It adds to ASOS' current approach of identifying and addressing potential risks through local engagement and audits and complements our collaborations with other non-governmental organisations working in this space, such as The Centre for Child Rights and Business in China. As a next step, ASOS will be reviewing additional suppliers to include in the next cohort of the programme.</p> <p>Gender Programme: This year, we published our gender policy, strengthening our commitment to gender empowerment in our supply chain. 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.</p> <p>Over the next year, we will pilot our gender programme in Morocco and support the establishment of women committees at factory level with the participation of women's rights organisations. These committees will help empower women workers and serve as gender sensitive grievance mechanisms at factory level.</p> <p>In collaboration with independent women's rights organisations, we will also develop a smartphone app to disseminate information on women's rights and available support mechanisms in the country. Once this project is completed in Morocco, we will roll it out to other regions, starting with Sri Lanka.</p>
<p>Goods for Resale (Brand Partners)</p>	<p>Self-Assessment Questionnaires (SAQs): As of June 2023, our enhanced supplier self-assessment screening processes request a deeper level of disclosure into our brand partners own human rights due diligence procedures. The self-assessment questionnaire helps us to identify and mitigate risks in our extended supply chains and develop learning opportunities to support our brand partners to improve their practises and processes, including additional support for SME brands.</p> <p>Within the ASOS FY24 self-assessment cycle all brands are asked to describe their approach to mapping, monitoring and assessing their supply base. We ask our partners for detail of the measures they have in place to mitigate the risk of Modern slavery and human trafficking in their supply chain, including evidence of their own modern slavery statement and whether they currently provide training to their employees on these topics.</p> <p>Legislative Engagement: During ASOS FY23 we have also worked closely with our internal and external stakeholders to educate on the importance of, and reinforce commitment to, current and upcoming legislative requirements which help prevent and mitigate the risk of forced labour.</p>
<p>Goods Not for Resale</p>	<p>Teams across our business have been supported through our partnership with Anti-Slavery International, including our Procurement team, who have regular meetings to discuss how to further strengthen due diligence in procurement practices.</p> <p>This year, Anti-Slavery International conducted research into the key risk areas and indicators related to fulfilment and returns centres in areas where ASOS operates. This included highlighting any considerations around legislation which will impact ASOS' operations. Informed by the risks identified through the initial research into warehousing, research was conducted into best practice. Additional opportunities to work with other brands to influence better practice within warehousing were also identified.</p>

Our Partnerships

We believe that collaboration is a key driver of sustainable change in the industry. Partnerships are integral to helping us address risks, including those associated with modern slavery. We partner with a wide range of organisations and initiatives, as detailed below. Further information on our work with these partners is available on our plc website, [here](#).



Assessment of Effectiveness

We use a variety of methods to assess the effectiveness of our actions to ensure that forced and child labour are not being used in our operations. We track key performance indicators such as employee completion rates of modern slavery training and the number of whistleblowing cases and grievances reported and solved globally. All our supplier contracts mandate compliance with our Human Rights Policies which encompass child and forced labour (available on our [PLC site](#)).

External advice and reviews are another essential element of assessing the effectiveness of our efforts. Engaging with an external human rights advisory firm to conduct an independent human rights salience risk review has helped to identify key risks along our value chain and shaped our strategic approach to mitigation and remedy. Our partnership with Anti-Slavery International forms another integral element of external accountability and independent advice.

Our Forward Commitments

We are proud of the progress and achievements of the past year, but we recognise that there is more to do.

Over the next 12 months, we will continue to strengthen our approach to managing the risks of modern slavery and other human rights abuses within our business and across our supply chain.

As part of our Modern Slavery Strategy, we intend to extend our scope, with a focus on our Goods Not for Resale (GNFR), and sites further down our supply chain. Training will remain a key priority as we roll out Modern Slavery training across our supply chain. Additionally, our strategy will aim to address the impact of climate change throughout our supply base.

From 2024 onwards, our Modern Slavery strategy update will be included in our Modern Slavery Statement.

This statement was prepared in accordance with the UK 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 29th May 2024 and signed on its behalf by:



José Antonio Ramos

José Antonio Ramos,
CEO

Appendix

ASOS in Canada:

Gross Sales Units FY23

ASOS own-brands and labels, and partner brands	592,880
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