

ASOS Health & Safety Policy

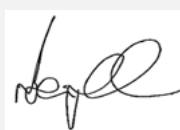
ASOS Global Health & Safety Policy Statement:

Everything we do at ASOS starts with the amazing people who work for our organisation. Ensuring the safety and wellbeing of all ASOSers, as well as any other persons who may be impacted by our activities, is our number one priority.

ASOS fully recognises and accepts its obligations and duties under the laws that apply to its operations around the world, to protect the Health & Safety of all employees, contractors, and visitors to any part of ASOS' business.

The ASOS Executive Committee is dedicated to doing all we reasonably can to provide a safe and responsible workplace for all employees, contractors and visitors, by:

- Providing all employees and contractors with the necessary information, equipment, training and supervision to carry out their roles safely and effectively.
- Controlling safety risks to keep those risks as low as is reasonably practicable and minimise the number of accidents and incidents that occur when people are in our care.
- Providing adequate resource, both financially and with dedicated professionals, for managing our health and safety risk.
- Encouraging the prompt reporting and recording of all accidents and injuries, however small, sustained by a person whilst on ASOS' premises, and any situation which could jeopardise the wellbeing of employees or any other person.
- Maintaining a positive safety culture that is transparent, inclusive and embraced by all ASOSers from the top down – Health & Safety is a shared responsibility.
- Proactively assessing the risks posed to the organisation, adhering to applicable legal requirements as a minimum and striving for a best practice approach where possible.
- Documenting and maintaining what we are doing to achieve all of the above, and regularly reviewing and revising those mechanics, actions and processes so they remain relevant and appropriate to the nature and scale of ASOS' operations and risks.



CEO, ASOS.COM LTD

Date: **21.08.2020**

Scope:

This policy covers ASOS' global operations at ASOS managed sites (e.g. offices) or sites engaged to perform activity on behalf of ASOS (e.g. Fulfilment Centres (FCs) and Returns Centres (RCs)). This policy does not cover the operations within supply chain and sourcing sites engaged, but not managed, by ASOS – for such sites, our pre-requisite due diligence checks and inspection programmes will ensure alignment with safety expectations.

Responsibilities:

ASOS recognises that for Health & Safety to be managed effectively it needs to be a shared responsibility; therefore, by applying both a top-down/ bottom-up approach, a positive Health & Safety culture is promoted and embedded across our business and operations.

Executive Board

- Overall responsibility for Health & Safety at ASOS.
- Allocating resources for fulfilment of the objectives within the Health & Safety policy.
- Setting an example to the rest of the organisation by following ASOS' Health & Safety standards.

General Counsel and Company Secretary

- Ensuring matters of importance regarding Health & Safety are reported and discussed at PLC Board, Audit Committee, and/or Executive Board level.
- Ensuring measures are in place to meet compliance with laws and regulations relating to Health & Safety.

Business Assurance

- Ensuring Health & Safety aspects and requirements are considered in Business Continuity Plans and Incident Response and Recovery Procedures.

Audit Committee

- Overseeing the effectiveness of ASOS' internal control and risk management systems, by scrutinising and assessing the processes, policies and systems ASOS has in place to ensure they are operating efficiently and effectively. The Committee holds ASOS accountable for its compliance with these processes, policies and systems and receives regular reports on the adherence to the Health & Safety policy.
- Monitoring the resolution of any issues or actions taken in connection with the Health & Safety policy.

Health & Safety Steering Committee

- Cascading Health & Safety information across the business following periodic updates from the Health & Safety Manager.
- Acting as a conduit for Health & Safety queries or concerns that are raised to each committee member as a local representative for the business area.

ASOS Senior Management

- Ensuring Health & Safety is always considered prior to ways of work changes being made that may affect the health, safety or welfare of staff.
- Ensuring that all line managers are made aware of their accountability for Health & Safety in areas of their control.

Health & Safety Manager

- Periodically review our Health & Safety performance, policies and ways of working to ensure controls are performing as intended.
- Set and monitor Health & Safety performance objectives.
- Delegated responsibility for ensuring the intended Health & Safety performance objectives are fulfilled.

- Ensuring means are in place for thorough, transparent internal and external reporting on Health & Safety performance.
- Ensuring the contents of our Health & Safety policy are communicated to all interested parties.
- Ensuring an adequate level of Health & Safety advice is given to all business areas, including the potential legal implications.
- Identifying Health & Safety training needs and planning for implementation as necessary across the business.
- Informing the necessary stakeholders of any updates and changes to laws and regulations impacting their business area.
- Ensuring means are in place for thorough, transparent internal and external reporting on Health & Safety performance.

ASOSers, Contractors and Visitors

- Co-operating with the Health & Safety guidance set by ASOS at all times.
- Take care of themselves and anyone else that may be affected by their activities.
- Report anything that could cause harm to them or others while within an ASOS managed space.
- Complete and follow the guidance detailed within any Health & Safety training assigned to them.

Health & Safety Standards:

The 'Health & Safety Standards @ ASOS' document outlines the minimum expectation that must be adhered to while operating within an ASOS site or a site engaged to manage activity for or on behalf of ASOS – including FCs and RCs.

The Standards form a framework for our internal governance audit programme that is managed by the Health & Safety team.

Complying with the law & standards:

The Health & Safety Manager will ensure that all applicable Health & Safety legislation is identified and integrated across ASOS. This will also be reflected through the maintenance of a Health & Safety legal and risk register, which will be regularly reviewed and updated in conjunction with the Business Assurance team. ASOS commit to always working towards best practice throughout its operations and adopting all relevant legislation in the territories where it operates.

Health & Safety Management

To successfully execute ASOS' commitment statement and build a working system, the management of Health & Safety will be subject to on-going evaluation and improvement by the Health & Safety team, subject to periodic validation by the ASOS Audit Committee. The framework of the system will always be proportionate to the Health & Safety risks within ASOS and contain all relevant procedures, guidance and forms.

Implementation of the Health & Safety management system will be achieved using innovative technologies and internal systems, where possible, to ensure it is unique to the ASOS business.

Communication

Effective Health & Safety management requires ongoing communication across all levels. The General Counsel & Company Secretary is the Executive sponsor for Health & Safety and helps drive key messages across ASOS, while the Business Assurance team provide subject matter expertise and support to ASOSers, both strategically, tactically and on an ad hoc basis. This includes personal support and influencing the wider Health & Safety culture.

The periodic Health & Safety Steering Committee drives forward the Health & Safety agenda and management of key risks. Stakeholders across key business areas attend the Steering Committee, providing a focal point for ASOSers feedback regarding Health & Safety matters.

Covid-19

Safeguarding our people, buildings and brand throughout the Covid-19 pandemic and beyond is of paramount importance to ASOS. We've implemented robust social distancing and safety measures to protect our people from Covid-19, wherever they are in the world, and always in line with local Government or WHO guidance. The measures we have implemented in our fulfilment centres have informed industry best practice, and we will continue to review and improve measures across all of our sites to ensure we maintain the industry gold standard.

Hazard Identification, Risk Assessment and Controls

ASOS is committed to the identification of significant hazards, risk assessment and the implementation of measures to protect our ASOSers, contractors and visitors. We recognise that it is a shared responsibility when it comes to hazard identification and reporting, and such arrangements for undertaking the assessments will be facilitated by the Health & Safety team who will also provide training, advice and support where required.

Training

ASOS will provide training where necessary to ensure that Health & Safety responsibilities and standards at work are understood and maintained. In conjunction with wider internal stakeholders, the Health & Safety team will ensure that an up-to-date training needs analysis is in place and implemented covering all business activities. This will include, but will not be limited to, the following:

- Induction for new starters and contractors
- General health, safety and fire safety training
- Workstation awareness training and assessment
- Specialist training (First Aider, Fire Marshal, Display screen assessments)
- Operation equipment training – safe system of work

Training will be adapted to suit the intended audience and will be informative and engaging.

Supply Chain sites

We recognise that the nature of our activities within our supply chain sites require specialist consideration. Our third-party providers ensure the effective management of Health & Safety through compliance with internally and externally accredited standards. The ASOS Health & Safety team will ensure our minimum expectations at our supply chain sites are met through an internal audit programme. The Health & Safety performance of each fulfilment centre will continue to be reported regularly into the sites leadership team to identify areas for improvement wherever possible.

The Health & Safety controls implemented across our supply chain sites are proportionate to the risks posed, this will be periodically reviewed for effectiveness through a number of means:

- Risk assessment
- Externally accredited assessments and audits
- Internal audit programme
- Compliance with any recommendations posed by regulating authorities
- Review of accident, incident and near miss data by Health & Safety and the third-party provider

Incident Reporting & Management

In conjunction with wider internal stakeholders, the Health & Safety team will ensure that appropriate procedures are in place for Health & Safety incident reporting, escalation response, incident investigation/analysis and subsequent improvement measures. These procedures will include arrangements for those incidents that require reporting to an external enforcement authority.

Fire Risk Management

In addition to the general risk assessment arrangements outlined in this policy, the Health & Safety team will work alongside the Space team and external risk management consultancy to create and implement a business-wide fire risk management strategy, based on best practice where this is reasonably achievable, by the end of 2020. Currently, fire risk management takes a site by site-based approach with external validation from our consultants. The fire risk management strategy will allow us to consistently govern practices across all locations to work to an 'ASOS standard'.

Event Management

All events run by or on behalf of ASOS shall be undertaken in a manner where the Health & Safety of all attendees is under advance consideration. The objective is to avoid any potential incidents that impacts on the Health & Safety of attendees and to protect ASOS' reputation. The Health & Safety team, the Events/Production team and the Space team shall work in partnership to ensure arrangements are put in place and best practice is adopted for any event organised.

Construction Projects

The Projects team or any other team involved with construction related projects will ensure that Health & Safety is considered throughout the whole design and construction process. Health & Safety risks will be managed through a comprehensive process which includes the review of method statements, risk assessments, insurance and permit approvals. The Health & Safety team will manage and maintain this process.

Health & Wellbeing

ASOS understands the importance of the mental and physical wellbeing of its employees. As a responsible employer, ASOS is focused on enabling our employees to feel supported being whoever they want to be, both at work and in their personal lives. All permanent employees have access to benefits via ASOS Extras and the well-being initiatives continue to be adapted to meet the changing demands and needs of our people. There will also be a sufficient number of wellbeing champions who are qualified mental health first aiders on hand across our sites.

Business Continuity

At ASOS, we have a robust business continuity programme with a formalised crisis & incident management framework in place. Designated teams are invoked either proactively to plan for an anticipated event or in response to a major incident. This structure includes a Gold, Silver, Bronze, 3 lines of defence approach, along with regional and functional incident teams.

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