

## **MODERN SLAVERY STATEMENT**

At New Look, we believe in respecting and improving the lives of our people across our business, including those who work in our global supply chains.

We recognise that no economy or industry is immune to the issues of modern slavery and human trafficking. Therefore, we continue to do all that we can to ensure that they do not exist in any part of our business or supply chain.

This report documents progress made to the end of the financial year 2020/21, published in line with our annual report.

Although this report relates to actions we have taken in the last financial year, we also highlight new focus areas for New Look. These have come about as a result of the ongoing pandemic and the need to raise awareness about the associated potential risks and vulnerabilities it has created. We remain committed to developing our policies, practices and ways of working to deal with the evolving risks we face as a business.

## WHO ARE WE?

New Look opened its first store in 1969 and is now a leading fashion brand. Within the New Look group, New Look Retail Holdings Limited is the group holding company where the main board of directors for the group is appointed. New Look Retailers Limited is the main employer and trading entity within the group.

### The business in numbers



**£542.2M**

**FY21 REVENUE**

Revenue £542.2m for 52 weeks  
to 27<sup>th</sup> March 2021



**9774**

**EMPLOYEES**



**1768**

**PEOPLE**

Total number of agency workers  
employed in FY21, in our DC,  
Stores and support centres.



**472**

**STORES WORLDWIDE**

472 stores worldwide, 5 of  
which were franchise at 27<sup>th</sup>  
March 2021



**66**

**COUNTRIES**

We deliver to 66 countries  
through newlook.com



**74%**

**PRODUCTS**

c. 74% of products are supplied  
by our top 10 suppliers

# OUR VALUE CHAIN MODEL

We have mapped our value chain, the different areas where people are employed and recognise that an extensive due diligence process is paramount to identifying risks. Slavery, forced labour, servitude, bonded labour and human trafficking are issues of global concern that could potentially affect all areas of our business and those working across our value chains.

We expect and insist that our suppliers look after their workers. Equally, in line with our responsibility as a company under the UN Guiding Principles of Business and Human Rights, have a duty to promote and protect the welfare of all workers across our value chain. To drive this agenda forward, we focus on sharing knowledge and risk-awareness with our suppliers and making our requirements and expectations very clear.



## **Own Operations**

At the end of FY21 we employed 9774 people. During this time, we employed a total of 1234 agency colleagues in our UK distribution centre and a further 534 in our UK stores and Support Centres.

- 467 stores in the UK and Republic of Ireland were in operation;
- We had support centres located in London and Weymouth; and
- We operated one distribution centre in Staffordshire, which distributed all stock to our stores, franchise and wholesale partners and fulfilled global E-commerce orders.

## **Goods for Resale (GFR)**

These are suppliers of products and services that are sold in our stores and online, including products made by third-party brands.

Many people are involved in supplying our products before they reach our distribution centres. We have a global supply chain of 176 suppliers and a network of over 480 factories across 24 countries, involving approximately 195,000 employees.

## **Services and Goods Not for Resale (GNFR)**

These are services and goods that we buy because they are needed for our business to operate and they are not sold to our customers. These services and goods include warehouse management, garment processing, outsourced customer deliveries, logistics, IT, utilities, cleaning and customer care. We procure these services and goods from more than 1200 suppliers, using a category management methodology.

## **Partnerships, Franchise stores and 3rd party e-commerce**

We continue to expand our third-party E-commerce business partners, including ASOS and Zalando, and currently trade with more than eight partners globally. Our franchise partners operate five stores and employ their own staff.

## **COVID-19**

The Covid-19 pandemic has impacted everyone globally, including the apparel industry and global supply chains in a way that could never have been predicted. Throughout the pandemic, we have continued to work closely with our suppliers and across our own operations to ensure that necessary support was provided. While this was uncharted territory for all, the welfare of our employees, our suppliers and their workers have remained a priority.

### **Value Chain**

A key priority for us has been to ensure that the workers in our suppliers' factories have continued to work in safe environments and have been paid their wages, as per local law. We have taken the appropriate action to provide financial support where necessary.

We worked with several of our partners and collaborated with different stakeholders in the relevant countries to encourage and where possible, facilitate access to local government funding.

To promote a safer working environment, we created and rolled out a checklist to all of our factories to ensure that they were operating safely and considering local and international guidelines as a precaution.

With our on the ground partnership with The Reassurance Network, we also carried out virtual factory visits where the primary focus was on health and safety (including personal protective equipment), policies and procedures, worker transport, accommodation and payment of wages. In FY20/21 we virtually visited 46% of our factories. These virtual visits are continuing into FY21/22, so we can ensure that the workers are still working in safe environments.

Throughout the pandemic, we provided regular updates internally, so our colleagues were aware of the situation in our sourcing countries and the impact on our value chains.

### **Own Operations**

Our distribution centre remained operational throughout the Covid-19 pandemic, with strict safety measures in place to ensure that our distribution centre employees were working in a safe environment. The safety measures have remained in line with the Government's Health and Safety Guidance. If employees had any concerns about their safety, there were channels in place to raise concerns, including our internal whistleblowing line and an internal health and safety email address.

Our support centres in Weymouth and London closed during the lockdowns, with employees working from home, where possible. Both support centres reopened in line with the easing of national restrictions, with safety measures in place and mandatory online training.

## **POLICIES AND GOVERNANCE**

We have a zero-tolerance approach to modern slavery across all areas of our business. Our Anti-Slavery and Human Trafficking Policy outlines our commitment to act ethically – not only to prevent modern slavery within our business and value chains, but also in outsourced employment (agencies) further down our GFR chains.

Our Board of Directors is ultimately responsible for compliance, but all our Business Directors are responsible for ensuring that our Anti-Slavery and Human Trafficking Policy upholds necessary legal and ethical duties and that all employees adhere to it. We ensure that our suppliers, contractors, partners and businesses across our value chains are aware of and understand their obligations, as well as upholding the policy in their businesses.

Examples of other policies which support our commitments in this area include:

- Equal Opportunities and Dignity at Work Policy
- Code of Ethics
- Whistleblowing Policy

We understand that we need to drive initiatives beyond our own business. We have a responsibility to identify potential risks from unauthorised subcontractors, the exploitation of a growing migrant workforce, or any other sectors of vulnerable labour.

As part of our supplier manual and trading and compliance standards, suppliers also commit to the below policies:

- Refugee Policy
- Child Labour Policy
- A Ban on Uzbek and Turkmen Cotton
- Homeworker Policy
- Migrant and Contract Worker Policy
- Anti-Slavery and Human Trafficking Policy
- Xinjiang Uyghur Autonomous Region Sourcing Policy

We continually review our policies and processes to ensure they achieve the right results. Our immediate focus is on ethical standards, to ensure that they are embedded into our organisation and direct value chains.

## **RISK PRIORTISATION**

We recognise that modern slavery may affect our people and those within our respective value chains. We have identified the below groups as those more vulnerable to risks of modern slavery and wider exploitation:

- Migrant workers
- Young workers and children
- Refugees and minority groups
- Temporary, contract or agency workers
- Homeworkers
- Women workers

We focus our efforts according to the risk factors, to have visibility of the areas that are at greater risk of modern slavery and to ensure that workers are protected.

Most risk lies in outsourced employment because we have less control and visibility of these workers and the employment practices of their employers.

Our overall group risk management process is constantly evolving. In GFR, more specifically within our key sourcing countries, we use a baseline risk assessment based on a combination of New Look specific requirements and other available risk matrices, such as Sedex, the ITUC Global Rights Index, etc. We also gather detailed information through our suppliers' factories profiles to make more informed decisions. We gather and analyse 3<sup>rd</sup> party audit data from annual social audits, identifying patterns and common issues to inform next steps and support needed to mitigate risks. Every tier 1 factory is expected to meet our annual audit requirements and we grade these audits depending on the issues found. We work closely with our suppliers and factories on remediation to ensure that the factories are improving, and worker welfare is protected and monitored.

We have documented our control environment as part of New Look's Risk Management process so that we can monitor the effectiveness of our controls. We produce a Group Compliance Report that is presented to our Governance Steering Group and Audit Committee.

## **DUE DILIGENCE**

### **Own Operations**

Without the appropriate checks and procedures, we recognise that there is the potential for modern slavery to occur within our own recruitment processes. Therefore, when recruiting new team members, we ensure that a robust selection process takes place – which is managed by a trained recruitment team. All applicants and potential hires must apply for opportunities of their own free will or give permission to be represented by a third party (agreed in the T&Cs with our recruitment agencies and workforce suppliers).

We improved our due diligence mechanisms by strengthening our direct hiring model. Approximately 80% of our employees were employed without the help of a recruitment agency. We continuously review our agency partnerships, where external support is required in the hiring process, and only work with employment agencies that have the same ethical standards as our own.

New Look works with one main recruitment agency in our UK distribution centre, which is regularly audited. Monthly management reports are provided to our Director of Logistics (detailing the recruitment activity and nationality of our temporary workers). The recruitment agency are Stronger Together members, so are trained to monitor red flags in relation to modern slavery. During each worker's induction, the team share that any concerns can be raised with them and show the Stronger Together informational film with additional support information shared. Since April 2017, our distribution centre has also operated an independent and well-communicated hotline for workers to report issues safely and confidentially.

### **GFR (Goods for Resale)**

We monitor our Tier 1 sites through independent third-party audits and specialised programmes. Since 2019, we have extended our monitoring programme to further Tiers, ultimately down to raw material source sites where possible. Our in-house Sustainability team and partner organisation, The Reassurance Network, conduct site visits (both physically and virtually) to promote transparency in the factories we use.

Whilst we are mindful of the limitations of audits, they offer an important input for risk assessments, which are combined with partner reports and market studies to help us better understand the risks. This helps us to work towards remediation of the high-risk issues.

We are a founding member of the UK based Fast Forward programme, as well as, for example, Sedex, the Ethical Trading Initiative (ETI), Business Social Compliance Initiative (BSCI) and the Sustainable Apparel Coalition (SAC) – see a full table under Partnerships.

As a signatory to the Transparency Pledge, we publish our Tier 1 factory list on a biannual basis in March and September and have furthered our commitment by publishing our Beyond Tier 1 list.

### **GNFR (Goods and services not for resale)**

Our supplier onboarding processes include an initial basic screening with a deeper due diligence for suppliers where a risk might be present using an objective risk scoring methodology.

We continue to revisit our existing GNFR supply base by working through our high-risk commodities. This includes cleaning services; road transportation; and other categories with high labour services. We remain focused on ensuring we have modern slavery clauses within our key contracts.

Challenges are ongoing with some suppliers in assessing awareness levels of Modern Slavery and practices in place to mitigate risk. However, through increasing communication at the outset of our principles and approach to Modern Slavery, we believe we are making significant progress. One of the practical steps in support we are providing is establishing a supplier E-Learning module, which will be freely accessible for all sites in our supply chain.

As members of the Indirect Procurement Human Rights Forum and working in partnership with Anti-Slavery International, we look forward to continuing to improve the channels of communications further in respect of Modern Slavery across the GNFR space.

### **Our Franchise stores and 3rd party E-commerce Partners**

In 2017, we introduced our modern slavery approach to our global partners through our 'Brand Days'. Here, we refreshed their understanding of our policies and expected standards. Additionally, we developed an e-learning module for our International Partners. For our other franchise partners, we ran a training session on modern slavery in our May 2019 Brand Day and are now developing a follow-on e-learning module, which is in process of development and will soon be rolled out.

### **Internal Audit and Assurance**

Environmental, Social, Governance (ESG) Standards is a risk area on our Corporate Risk Register, and in the 'Risks and Uncertainties' section of our Annual Report. This helps to ensure that from a strategic point of view, the associated ESG risks are regularly monitored and are key factors used to inform our annual Internal Audit Plan and assurance work.

The last Internal Audit review was completed in FY19, with all improvement actions signed off as complete. ESG has been included on the Agile Internal Audit Plan and will be audited as part of this rolling assurance process.

The Internal Audit team provides on-going support to the Modern Slavery Working Group. In FY21, the supporting risk register was reviewed and updated to enable the group to monitor the effectiveness of the control environment.

### **Access to Remedy**

Workers need to have trust and confidence to raise concerns as and when they arise. Ideally these are through traditional workplace channels, but when these fail, other independent avenues need to be provided. We have facilitated access to whistleblowing helplines in two strategic sourcing countries for New Look: in Bangladesh through the Accord and in the UK as part of the Fast Forward programme. In Turkey, our strategic supplier introduced their own whistleblowing line at the end of FY21 and we will be working closely with them to risk assess how worker confidentiality is maintained and how information is gathered and reported.

The more we understand the underlying challenges in our value chains, the better we can target our approach. It is important to have access to remedy and adequate channels to deal with modern slavery cases.

In the UK, all the factories we source from must enrol in a hotline programme. Each factory, manufacturing or processing New Look goods must display posters that include the hotline programme's contact details. This allows workers to call should they need to or report their concern through an online platform.

In FY21, we logged 16 reports of alleged issues raised by factory workers and unions globally. The nature of issues encountered included unauthorised subcontracting, Covid-19 workplace safety, concerns about working hours, issues relating to workers' pay, holiday and overtime pay, and concerns about working conditions. We addressed each report on a case-by-case basis and followed up with tailored remediation plans that would protect workers against repercussion.

We have designated communication channels for our own employees and suppliers to raise modern slavery concerns. As part of New Look's Anti-Slavery and Human Trafficking Policy, we have also appointed a Modern Slavery Officer for the business, who at present is the Head of Sustainability, Sourcing and Quality.

We have a remediation plan to follow in the event that forced labour, modern slavery or human trafficking activities are found in our business or value chain. Since the symptoms and root causes of forced labour are varied, the investigation and corrective actions need to be tailored to the circumstances that surround any potential case.

### **Training**

We provide training by way of e-learning to all our in-house employees about the risks and possible indicators of modern slavery and human trafficking. For our new starters, this training is mandatory and must be completed within their first two weeks of their start date, after this their training becomes an annual, mandatory module, with a 4-week window provided to complete it. The content is reviewed annually, and compliance is monitored centrally.

As part of the training, we encourage employee vigilance and willingness to challenge a situation.

Through our mandatory e-learning programme, we aim to help people understand how to work together, internally and externally, if they encounter something that raises concerns.

Through our membership with Fast Forward, our suppliers and factories in the UK can attend training sessions on the audit programme. Any new suppliers and factories that we work with in the UK are asked to take part in the training, to help them understand the audit methodology to ensure best practice.

## PARTNERSHIPS

We are committed to tackling human rights issues directly and have a dedicated team who promote and drive sustainability across the whole business.

The Sustainability team work closely with our buyers and GFR suppliers to monitor purchasing practices and help teams to understand the impact on people in our supply chain.

To meet our global sustainability goals and address the issues facing the fashion industry, we think that it is vital to partner and work with governments, the private sector, civil societies (e.g. NGOs and Trade Unions) and other relevant stakeholders.

The key collaborations and initiatives we are part of, which help support our commitment are:

Partner	Who	Purpose	Working together
<a href="#">Action Collaboration Transformation (ACT)</a>	ACT is a ground-breaking, precompetitive initiative between international brands and retailers, manufacturers and trade unions to address the issue of living wages in the textile and garment supply chain through purchasing practices.	Living wage and collective bargaining agreements	As an active participant in ACT, we assessed our purchasing practices within the ACT framework and are now taking relevant actions to improve on focussed areas.
<a href="#">Apparel and General Merchandise Public Private Protocol (AGM PPP)</a>	The AGM PPP is a multi-stakeholder initiative which aims to prevent the exploitation of vulnerable workers in the UK's garment industry.	Modern Slavery	We are engaged in two working groups through the work of the AGM PPP; one focuses on worker voice and the other on business accountability.
<a href="#">Better Cotton Initiative (BCI)</a>	The BCI makes global cotton production better for the people who produce it, better for the environment it grows in, and better for our sector's future.	Modern slavery in lower tiers	BCI contributes to our target of 100% sustainable cotton by 2021. Better Cotton is produced by farmers who implement seven principles, including Decent Work.
<a href="#">British Retail Consortium (BRC)</a>	BRC is the trade association in the UK, which we are members of.	Modern slavery	In 2019, we joined the BRC's Better Retail Better World initiative.
<a href="#">Call to Action - End Uyghur Forced Labour</a>	Coalition of civil society organisations and trade unions united to end state-sponsored forced labour and other egregious human rights abuses against people from the Uyghur Region in China.	Modern Slavery	As an endorsee, we have agreed to map our value chain to ensure we are not knowingly supporting the abuse of Uyghur workers directly or indirectly.
<a href="#">Ethical Trading Initiative (ETI)</a>	ETI is a global alliance of companies, trade unions and NGOs that promotes respect for workers' rights.	Labour rights	We adopted the ETI's Base Code of Conduct, which is based on the standards of the International Labour Organisation (ILO) as the foundation of our Ethical Aims. Under those aims, employment should be freely chosen and forced, bonded or child labour cannot be used.
<a href="#">Fast Forward</a>	Fast Forward is a next-generation supply chain labour standards improvement programme that works for all suppliers and service	Modern Slavery in UK supply chains	We implement this programme in our UK supply chain and are currently auditing all facilities down to Tier 2, which includes

	providers, in all sectors, at all stages of their social compliance journey.		manufacturing sites, reprocessing facilities and landed warehouses.
Indirect Procurement Human Rights forum (IPHR)	Cross industry collaboration to protect and respect human rights in GNFR supply chains.	Modern slavery in GNFR supply chains	We engaged with the IPHR Forum at the end of FY20 to focus on various areas of our GNFR supply chain.
<a href="#">Sedex</a>	The Sedex platform has a variety of tools and services that supports human rights due diligence in supply chains.	Audit and risk management	Through our Sedex membership, we utilise the risk analysis tools to understand the risks in our sourcing countries and to help us make informed decisions.
<a href="#">SMART Myanmar</a>	SMART is funded by the European Union and co-funded by private sector partners. It aims to improve working conditions, promote labour and environmental standards and reduce labour right abuses in the textile and garment industry.	Management system improvement	In 2019, we partnered with SMART Myanmar to deliver HR Management and Social Compliance training in three factories.
<a href="#">The Reassurance Network (TRN)</a>	TRN is a close-knit team of specialists located in major sourcing regions helping manufacturers, suppliers and agents to understand and improve working conditions and factory performance.	Modern Slavery	We partnered with TRN in 2019, to support us in the implementation of groundwork in several sourcing countries.

## PROGRESS TO DATE

As part of our ongoing monitoring, we have identified several ongoing priority areas that pose a greater risk to modern slavery. These areas, alongside new priorities for the coming financial year will have their progress reported on. We remain committed to reporting and have highlighted progress in the below table.

	Potential Risk	Aim and Progress in FY 20/21
Own Operations	Labour providers we use not adhering to the high standards set out in our policy, including a prohibition on charging fees to workers, for example. Such failure results in a high risk of forced labour situations.	<p><b>Aim:</b> To protect agency workers in our own operations</p> <p><b>Progress</b></p> <ul style="list-style-type: none"> <li>• We have used a single agency: GI Group, since May 2017 to supply our Distribution Centre, the main area in our business where we rely on temporary agency labour, particularly at peak times. GI Group does not use overseas partners, and only recruits foreign workers already resident in the UK, which reduces the modern slavery risks associated with travel for work. They operate robust checks for modern slavery indicators, such as duplicated bank details (suggesting someone else may be collecting workers’ wages), similar mobile phone numbers (suggesting SIM cards may be bought and distributed in bulk to groups of workers) and forged or invalid personal documents. Our time and attendance systems also safeguard against worker substitution.</li> <li>• GI’s commitment as a Stronger Together Business Partner and being an active member of The Association of Labour Providers, The Recruitment and Employment Confederation and the GLAA Labour Provider/User Group provide us with a consistent flow of information and support tools.</li> <li>• GI Group is regularly audited and provides monthly management reports to show the recruitment activity including the nationality of our temporary workers. They assess, recruit and on-board all our agency workers on our behalf. In a Peak period (cyber for example) 46% of our warehouse workforce would be employed through the GI Group. Our normal run rate (when not in a peak period) of agency workers is 31% of our warehouse staff.</li> <li>• Any subcontracted agency used by our main provider needs to either already be a member of Stronger Together or be in process of application, along with completing all other relevant checks, as are in place for our main provider. These will be led by GI and monitored by New Look.</li> <li>• We engaged with the IPHR Forum at the end of FY20 to focus on various areas of our GNFR supply chain.</li> </ul>

Goods for Resale	<p>Potential for heightened risks of modern slavery going undetected if the supply chain is not transparent.</p> <p>Risk of unauthorised subcontracting.</p>	<p><b>Aim:</b> Continually increase the transparency of our product supply chain.</p> <p><b>Progress:</b></p> <ul style="list-style-type: none"> <li>• We publish our Tier 1 and Beyond Tier 1 list on our <a href="#">group website</a> on biannual basis.</li> <li>• In FY21 we sourced 74% of our products from our 10 largest suppliers and have mapped 70% of their Tier 1+ and Tier 2 supply chains, including tanneries making leather products.</li> <li>• We are continuing to work towards our sustainability agenda with ambitious targets to limit the impact at every step of our supply chain. We will increase transparency further with the following targets: <ul style="list-style-type: none"> <li>◦ 100% of wet processing units disclosed by 2020, with additional plans to monitor and promote the best practice in place. Unfortunately, Covid-19 has impacted our progress in this area.</li> <li>◦ 100% sustainably sourced cotton by 2021. – End of FY21, we had reached 74% sustainably sourced cotton in our products.</li> <li>◦ 100% traceable and sustainable viscose by 2023. – End of FY21, we had reached 38% traceable viscose.</li> </ul> </li> <li>• In the UK, we have assessed Tier 1 and Tier 2 against the Fast Forward programme. Our plans to roll out the Fast Forward programme to the landed warehouses and reprocessing facilities was delayed due to the various lockdowns. Two audits went ahead while it was safe to do so in the Autumn of 2020. Audits started to take place again at the end of FY21.</li> <li>• We have an unauthorised subcontracting policy which requires all Tier 1 factories manufacturing our product to be registered prior to production being placed. This reporting year, we had 13 cases of unauthorised subcontracting. In all 13 cases, our suppliers were given warnings and we visited the factories for due diligence purposes. The factories were issued with corrective action plan reports following these visits.</li> </ul>
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<b>Goods for Resale</b>	<p>Suppliers' use of migrant workers recruited through agencies can put workers at risk of exploitation, unaware of their rights and terms of contract.</p> <p>Migrant workers are recognised as more susceptible to debt bondage.</p> <p>Refugee workers are more vulnerable to human trafficking, forced, and bonded labour. Refugee workers are particularly prevalent in Turkey.</p>	<p>We have a Migrant Labour and Contract Worker policy and Refugee policy which is included in the supplier manual. This policy can be found on our website.</p> <p><b>Aim:</b> Achieve a clearer picture of the use of migrant and refugee workers in our supply chain.</p> <p><b>Progress:</b> We conducted a preliminary risk assessment using data from Tier 1 third party audits:</p> <ul style="list-style-type: none"> <li>○ Migrant workforce represents 6% of the total workforce globally</li> <li>○ In China, 56% of workers are migrant (local). Although we have no tier 1 or tier 1+ factories registered in Xinjiang region, we are actively mapping our cotton supply chain to ensure that there is no risk of forced labour.</li> <li>○ Last year we mapped six facilities that were linked directly or indirectly to the labour use of Uyghur workers. We worked with our suppliers and have either terminated the relationship, or in most cases, worked with our suppliers to redirect the sourcing route.</li> <li>○ Other countries with a high proportion of migrant labour are the United Arab Emirates with 100% (only in one factory), followed by the UK with 25% Cambodia with 15%.</li> </ul> <p><b>Aim:</b> To support the no discrimination and fair treatment of refugee workers when found in our supply chain.</p> <p><b>Progress:</b> Syrian refugees account for 6% of our Turkish value chain.</p> <ul style="list-style-type: none"> <li>○ Since the implementation of our refugee policy and remediation plan in 2016 we found nine cases of refugees working without a work permit. In FY21, one new case was reported.</li> <li>○ By working closely with our suppliers and factories, we have ensured that the Syrian workers were able to obtain the approved work permit, following a successful application.</li> </ul>
	<p>Suppliers' failure to have in place proper HR controls can lead to children being employed illegally.</p>	<p><b>Aim:</b> Ongoing implementation of our child labour policy and remediation plan.</p> <p><b>Progress:</b></p> <ul style="list-style-type: none"> <li>• We have checks in place to identify young workers and support suppliers and young workers in cases where they are found.</li> <li>• We have not found any cases of child labour in FY21.</li> <li>• We continue to monitor the presence of young workers through our factory visits and 3rd party audits. We consider young workers to be more vulnerable and this is a key focus area on our assessments.</li> </ul>

<b>Goods for Resale</b>	<p>Suppliers must ensure their labour providers meet our standards. Failure could result in a risk of forced or bonded labour situations.</p>	<p><b>Aim:</b> Understanding risks faced by the agency workers in our supply chain.</p> <p><b>Progress:</b></p> <ul style="list-style-type: none"> <li>• In FY21 we signed the Call to Action by The Coalition to End Forced Labour in the Uyghur Region to confirm our commitment that we will not knowingly source any raw material or services for the manufacturing of any of our product which exploits people from the Uyghur Region in China.</li> <li>• FY21 we have risk assessed and mapped agency workers in our Tier 1 supply chain. <ul style="list-style-type: none"> <li>○ 1% of the total workforce globally is formed by agency workers.</li> <li>○ 97% of these workers are in factories in 3 countries: India, Turkey and Sri Lanka.</li> <li>○ Our data by country shows that 19% of the Indian workforce are agency workers, representing 67% of the agency workforce globally. This number is followed by Turkey, where 1% of the workforce are agency, and that is 15% of the total agency workforce globally.</li> <li>○ Our reporting shows that Sri Lanka, Turkey and Morocco have the highest number of young workers (under 18 years of age).</li> </ul> </li> <li>• Our data shows that 26% of UK, 6% of the Moroccan workforce and Moldova with 4% have temporary workforce, accounting for 28% of total temporary workforce globally.</li> </ul>
	<p>Women workers are particularly vulnerable to exploitation.</p>	<p><b>Aim:</b> Identify concentrations of women in our supply chain who may be in a vulnerable position.</p> <p><b>Progress:</b></p> <ul style="list-style-type: none"> <li>• We carried an analysis in the last financial year for identifying concentrations of women workers in our Tier 1 supply chain. <ul style="list-style-type: none"> <li>○ According to our data, 54% of the total workforce of our Tier 1 supply chain is female.</li> <li>○ 42% of the total number of female workers globally are in these five countries Bangladesh, China, Turkey, Cambodia and Myanmar.</li> <li>○ Our analysis showed both Moldova and Romania have got 92% women workforce. Morocco and Sri Lanka have 68%. China has 62% and Bangladesh 50%.</li> </ul> </li> </ul>

<b>Services and Goods Not for Resale</b>	<p>Lack of knowledge about our suppliers, leading to a higher risk of undetected modern slavery issues.</p>	<p><b>Aim:</b> Increasing transparency of how our service providers and goods not for resale suppliers operate, to be able to identify and guard against modern slavery risks and to help them do the same.</p> <p><b>Progress:</b> We continue our screening program of existing suppliers and as part of the onboarding process across the GNFR space. Through this, we pro-actively engage with our suppliers enabling a more impactful approach across our supplier base. Our membership with the Indirect Procurement Human Rights (IPHR) forum helps us to engage further with our industry peers on common themes and share best practice.</p> <p>Relevant progress in this area:</p> <ul style="list-style-type: none"> <li>• Our vendor onboarding processes ensure we conduct a focused initial screening of GNFR suppliers to identify where there may be a heightened risk enabling filtering of suppliers requiring deeper due diligence.</li> <li>• We are further developing our deeper due diligence assessment for suppliers who were identified as requiring a more detailed review through a more in-depth modern slavery questionnaire.</li> <li>• Following the detailed screening of those suppliers highlighted as a potential risk within our GNFR supply chain, we are introducing monthly reporting to Senior Management based upon an agreed risk grading.</li> <li>• We continue to ensure all new contracts include a Modern Slavery clause with our own standard contracts, purchase orders and terms and conditions updated to incorporate this and to underpin New Look’s policy requirements.</li> <li>• Throughout FY22 we will continue to revisit our existing supply base focusing on high risk categories to assess their policies and practices through collection of data using our revised in-depth modern slavery questionnaire.</li> <li>• For suppliers who flag as high or above average risk from our in-depth modern slavery questionnaire we will do further support education in respect of modern slavery which will include a requirement for their completion of a mandatory eLearn module.</li> <li>• We will continue to leverage our relationships with bodies such as Anti-Slavery International and IPHR to engage on high-risk commodities such as logistics to ensure that in respect of Modern Slavery and how we guard against it becomes a collaborative program between New Look and our suppliers</li> </ul>
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<b>Our Partners</b>	<p>Failure by our partners to comply with our standards, leading to increased risk of modern slavery arising in their businesses, operate under our brand.</p>	<p><b>Aim:</b> Our first focus remains on our own business and value chain, but we recognise that it is also important to work with our partners to highlight modern slavery as an issue and check they are complying with our policy.</p> <p><b>Progress:</b></p> <ul style="list-style-type: none"> <li>• In FY21, we created a set of minimum requirements for our brand partners. The key focus areas are: <ul style="list-style-type: none"> <li>◦ Ethical compliance (including modern slavery statement)</li> <li>◦ Transparency of the supply chain</li> <li>◦ Chemical compliance</li> <li>◦ Environmental compliance</li> <li>◦ Animal welfare</li> </ul> </li> <li>• In FY19 we updated all our standard contracts (also referenced in our Letter of Intent which is used ahead of a new partner signing our long form agreement) to include our Modern Slavery Policy.</li> <li>• We experienced a delay to our e-Learning module being fully developed. This is now complete, and we will roll this out across all partners as we still believe that this is the best way to make clear the standards we expect from our international partners.</li> </ul>
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## NEXT STEPS

Our modern slavery agenda has not deviated from our direction of travel. It is key to acknowledge that modern slavery can happen in any area of our business and criminal exploitation can be difficult to uncover, which is why it is so important to have an evolving risk mitigation approach. We continue to recognise the risks our value chain faces, by regularly mapping key areas to determine our priorities. We have a responsibility but cannot tackle it all alone. Collaborative approaches are integral, so we always advocate for them.

The Modern Slavery Working Group will work within a wider business transformation programme to accelerate initiatives over the next 3 years. Next year, our priorities will be on the following areas:

- We will continue our efforts to deliver training to increase awareness of modern slavery across our own organisation, relevant external parties and key contractors. We will focus on our growing 3<sup>rd</sup> party brands and our logistics partners.
- We will place a strong focus on tailoring a collaborative approach and remain alert to existing modern slavery risks that are shared across the industry. We commit to agreeing to an approach to growing concerns surrounding potential bonded labour in Chinese supply chains, and in supporting industry initiatives to ensure Modern Slavery is not present in UK supply chains, in particular, Leicester.
- Where visibility is clouded, we commit to achieve greater transparency throughout our value chain. To reach our goal, we will embed targets across the organisation, such as pledges including; 100% sustainable cotton by 2021; and 100% traceable viscose by 2023. We also promise to continue to map our wet processing units for chemical management and the embedding of worker demographic analysis for our GNFR suppliers.
- We will continue to seek guidance and support from expert organisations on handling any modern slavery cases.
- We will continue to raise awareness and build the capacity of our varied supply chains. This work will also include a renewed approach of our whistleblowing policy.
- To facilitate working more closely with local civil society organisations to help us identify underlying issues workers may be facing, which put them at greater risk of Modern Slavery. We will be implementing training opportunities in how to implement these approaches as well as more in-depth work around creating greater access to remedy.
- We will work in greater depth with our logistics teams to better map and understand the full breadth of our connections to global transport. We will be exploring opportunities for collaboration with relevant partners.

New Look's Modern Slavery Statement was prepared by our Modern Slavery Working Group and approved by the Board of Directors of New Look Retail Holdings Limited on 22<sup>nd</sup> June 2021.



Nigel Oddy  
Chief Executive Officer  
New Look Retail Group Ltd.  
22/06/2021