



KIND TO OUR CORE

# Sustainability Strategy Refresh

—— 2022 ——

NEW LOOK





## SUSTAINABILITY STRATEGY

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# Executive Summary

Sustainability is not new to New Look, and we are proud of our achievements to date – but priorities shift, and it's never been more important for fashion brands to be accountable and act in a responsible and transparent way. This strategy refresh is ambitious. It will drive progress, offering transparency and comparability of performance, focusing on addressing the most substantial issues for New Look and our stakeholders.

This won't be easy – there's no clear industry roadmap and long-term success will require strong leadership and culture shifts along the entire value chain. We've recognised a need to think as global citizens but deliver this through local actions to best effect the communities we impact, from those producing and delivering our goods to those who buy them. As an employer of almost 10,000 people, we want our New Lookers to be proud to say they work for us and feel they can be themselves at all times in the inclusive culture we create.

Our updated strategy is formed around four pillars: Responsible Business, Responsible & Circular Product, Inclusive Culture, and Positive Local Impact. Responsible Business is our core pillar, it's the engine of our brand, Positive Local Impact is our overriding focus and informs all we do, Responsible & Circular Product drives our

commitment to reduce social and environmental impact and play our part in wider industry transformational change and Inclusive Culture is ensuring we are embracing difference and welcoming everyone.

In this report, we have outlined a comprehensive set of targets. We are aligning with recognised industry programmes and benchmarks as well as collaborating when collective industry action makes sense – though not at the expense of moving forward; we will forge ahead with actions we know will contribute towards our global targets. We recognise that our stakeholders, customers, colleagues, investors and, in fact, the whole planet, want to know we are acting responsibly and supporting a shift to business practices that lower our impact on people and the environment.

This is a forward focused strategy update, sitting alongside our statutory reporting of the 2020/2021 Annual Report, and we will report progress from financial year 2022. We are committing to share hard, comparable data to supplement our customer-facing sustainability narrative, which encourages a move to a more sustainable lifestyle, while still enjoying fashion.





# Foreword



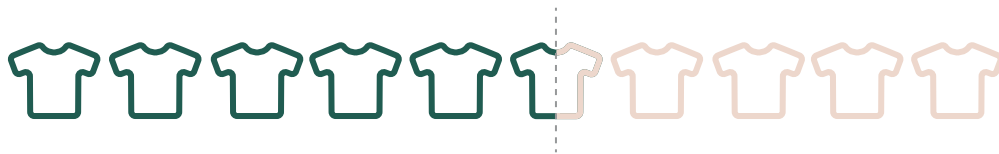
'As a leading broad appeal fashion destination, addressing our impact on the environment is not a choice, it's our responsibility to our people, our customers and the wider society.

We are fully committed to embracing and accelerating change, to enable us to operate a business which is 'Kind to our core'. This vision is one of the key foundations of New Look's transformation strategy, both at a global and local level, and is driven by hard targets and solid actions to get us there. Being a more environmentally aware and responsible retailer is part of the brand's DNA which is woven into everything we do and we are excited to lead our loyal customers, and invite new shoppers to join us, on the path to create a more sustainable future for New Look.' – Nigel Oddy, CEO

The last financial year (FY21) tested the resilience of our business and our entire value chain – including our customers, colleagues, supply chain, business partners and investors – and we continue to react, learn and adjust to the global legacy of the Covid-19 pandemic.

During this time, we've not wavered from our sustainability pledges. The backdrop brought sharply into focus the need to play our part by strengthening the purpose and values of our business, embracing increasing calls from all stakeholders to accelerate real sustainable value through responsible business practices.

55% of our clothing for Autumn/Winter 2021 had sustainable attributes



2% of our clothing in 2018 had sustainable attributes





We recognise our complex industry is frequently cited and measured for its impact on people and the environment. We acknowledge the part New Look plays in the international efforts to deliver on the climate change aims of the Paris Agreement and the more recent Glasgow Climate Pact from COP26, the global ambitions for change with the Sustainable Development Goals and the social change agenda brought about by movements such as Black Lives Matter. These issues have helped shape our targets and the way we're evolving our business.

Moreover, we acknowledge that our investors and other stakeholders want expanded ESG (Environmental Social Governance) insights regarding our risks and progress, so greater transparency across our value chain and in the way we report have been key objectives and developments this year.

This report serves as a refresh of our Sustainability Strategy, building on our reported achievements to date and extending the reach of our sustainability in a new approach involving everyone in our business. Alongside the statutory reporting found in our annual report, we are now aligning with and incorporating SASB (Sustainability Accounting Standards Board) reporting, please see appendix 1. FY22 will see us publish our first full SASB report and the auditing of our Higg Brand Retail Module.

Moreover, we plan to create science-based targets for our Greenhouse Gas (GHG) reduction that are approved by the Science Based Targets Initiative (SBTi) and undertake risk assessments and scenario planning that is aligned to the Task Force for Climate Related Disclosures (TCFD) methodology. We feel it's important to drive transparency in our industry and provide our investors and wider stakeholders with comparable data on the fundamentals of our sustainability performance.

# 100%

Buyers trained on  
purchasing practices in 2021

## Carbon Neutral

in our own operations  
since 2019

Committed to

## SBTi

in 2021

## Carbon Literacy

for all Directors &  
Managers in FY22

## SAC Members

Since 2019

### What is The Paris Agreement?



A legally binding international treaty on climate change. Adopted in Paris 2015, its goal is to limit global warming to well below 2°C, and preferably to 1.5°C, compared to pre-industrial levels. To achieve this countries aim to reach global peaking of greenhouse gas emissions as soon as possible to achieve a climate neutral world by the mid-century. That is why Governments, and New Look as a responsible business, must identify climate change mitigation, adaptation, and finance.



The 26th Global United Nations climate conference, bringing together governments, NGOs, trade unions, businesses, to review and negotiate climate action. Commitments made include reversing deforestation, phasing out coal and increased financial aid for developing countries, outlined in the Glasgow Climate Pact.



New Look supports the Sustainable Development Goals (SDGs): 17 interlinked global goals designed as a blueprint to achieve a better and more sustainable future for all. Set up in 2015 by the United Nations General Assembly, they are a call to action and intended to be achieved by 2030. You will see SDGs referred to alongside our targets.



SASB Standards are recognised to guide the disclosure of financially material sustainability information by companies to their investors. The Standards identify the subset of environmental, social, and governance (ESG) issues most relevant to financial performance. New Look will align their reporting to The Apparel, Accessories and Footwear Sustainability Accounting Standard.



New Look's 50-year history was built on a foundation of local, diverse and inclusive culture – as well as long-standing supply partnerships. Sustainability to date has taken many guises and, over the last 20 years, our ethical trade policy has matured. We have been at the forefront of recognising a responsibility to the people who make our products and tackling the risks of Human Rights abuse.

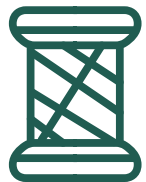
In 2018, New Look understood that along with the work of our ethical/corporate responsibility team, we had a stronger impetus to do more and address the issues we had found. Pockets of good were happening across our business which needed to be stitched together for maximum impact. Environmental responsibility had been growing but was slower to gain momentum.

We were understanding our impact more and more – but we knew we needed to make these impacts more visible and measurable, not just the GHG impact associated with climate change but also the impact of water scarcity, chemicals and waste on the environment.

Cross-business workshops, customer and industry insights as well as consultations with experts led us to the development of 'Kind' products in 2019. With improved verifiable sustainability credentials, these now account for 55% of our clothing product. Kind products and pledges have evolved into 'Kind to Our Core', a key pillar in a three-year business strategy backed by our Board, our CEO and our Directors, company-wide.

Kind to Our Core is a refreshed sustainability vision, complete with guiding principles, targets and transparent Key Performance Indicators (KPIs). It aligns with industry-recognised benchmarks and addresses upcoming legislative and regulatory change, allowing our progress to be measured, compared and reported.

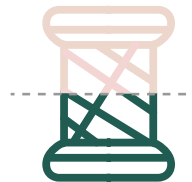
We are proud of our achievements over the last three years, we know we need to do more. Materiality assessments conducted in the last year show greater shifts needed in our priorities to raise the bar further. We will make even better choices in the raw materials we buy, the best practices we advocate and the circularity we implement into our products and processes.



**100%**  
sustainable cotton  
by 2022



**100%**  
sustainable viscose  
by 2023



**50%**  
recycled synthetics  
by 2024



The Higg Index was developed by the Sustainable Apparel Coalition, in partnership with more than 250 member companies, including New Look. It offers a trusted suite of tools including the Higg Facilities Environmental Module (Higg FEM) and the Higg Facilities Social & Labour Module (Higg FSLM) which standardise facilities measurements of environmental and social and labour impacts across the value chain. In addition, the Higg Brand & Retail Module (Higg BRM) assesses life cycle stages of a product as it goes through our value chain, identifying sustainability risks and impact, allowing New Look to share sustainability progress using trusted data.



SCIENCE  
BASED  
TARGETS  
DRIVING AMBITIOUS CORPORATE CLIMATE ACTION

The Science Based Targets Initiative (SBTi) is a call to action. It is a partnership between the Carbon Disclosure Project (CDP), the UN Global Compact, World Resources Institute (WRI) and the World Wide Fund for Nature (WWF). It supports companies to understand how much and how quickly to reduce GHG emissions in line with the Paris Agreement. New Look committed to SBT's in 2021 and now have 2 years to model and set these targets, including a roadmap for delivery.



The Financial Stability Board created the Task Force on Climate-related Financial Disclosures (TCFD) to improve and increase reporting climate-related financial information. Broadly speaking, we will look at the impact climate change could have on New Look.



Moreover, as the way in which we sell changes, thanks to increased digital channels, we've recognised the growing diversity of the customers we serve – and doing that to the best of our ability has emerged as both a priority and an opportunity. Inside New Look, our own teams have been telling us they feel they can be themselves at work, but we know we need to go further to deliver a more equitable and inclusive culture.

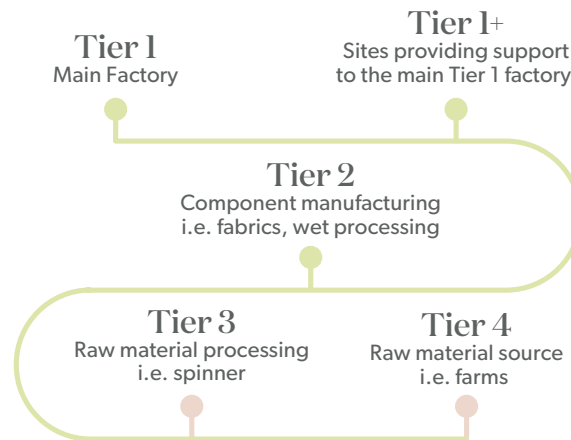
To deliver on our Kind to Our Core strategy, we have created 4 pillars:

- Responsible Business
- Inclusive Culture
- Positive Local Impact
- Responsible & Circular Product

The first three pillars cover the full scope of our value chain, namely our own operations, supply chains and communities we retail in. Our fourth pillar, Responsible & Circular Product, covers the impacts across the full life cycle of the product.



**89%** of New Lookers say  
they can be themselves at work



**80%** of tier 1 & tier 2 facilities to  
complete Higg FEM by **FY23**

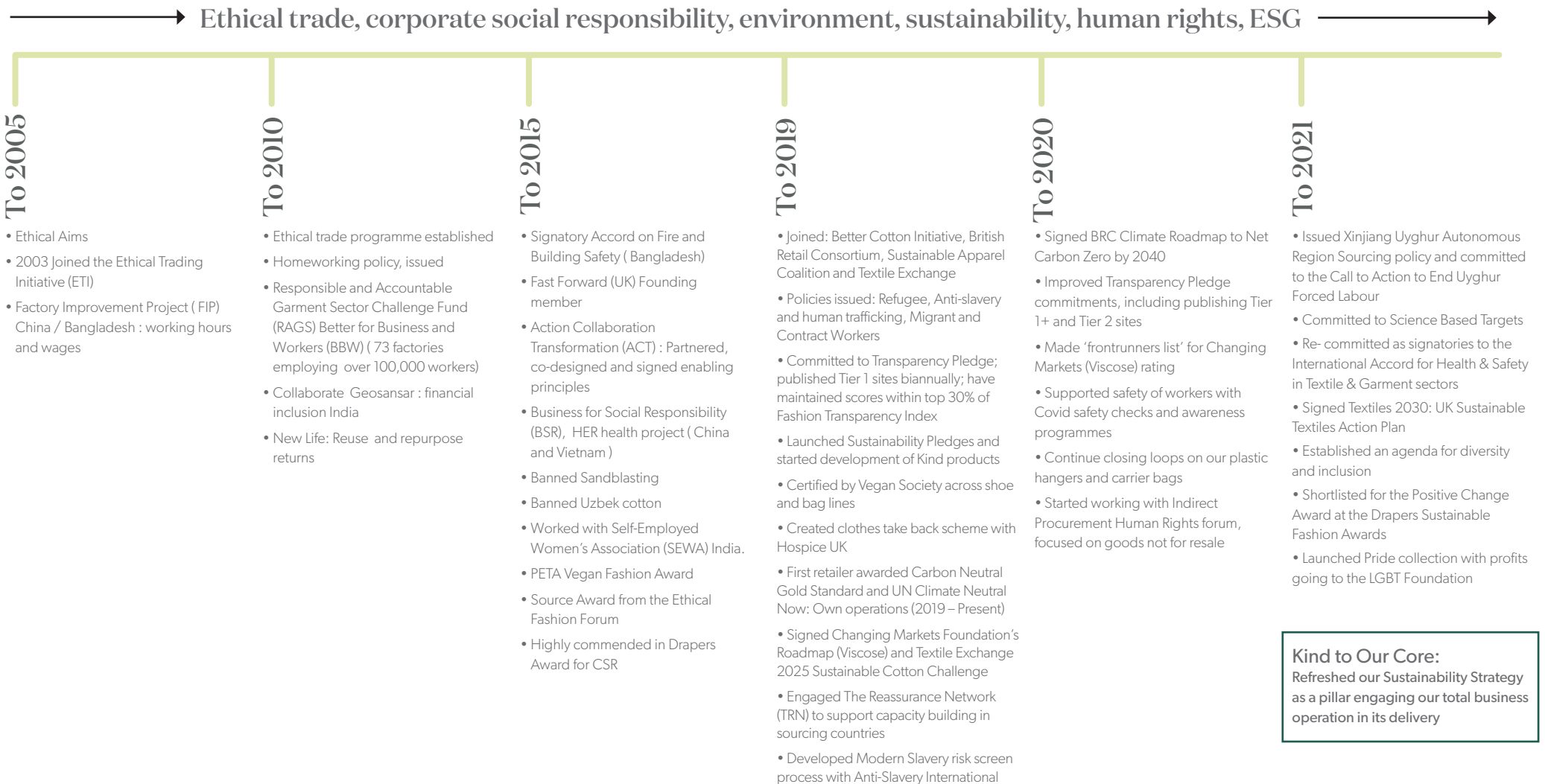


**100%**  
of packaging will be sustainably  
sourced or have recycled content  
by FY23



# Sustainability History

Our activities on sustainability began 20 years ago and have changed in nature over time, more specifically since 2019, and have become much more holistic, embedding across the full breadth of our business, products and value chain.





# Kind to Our Core: Sustainability Vision, Principles and Priorities

As a fashion brand, we understand more than ever, the social and environmental impacts across our business, our value chain and our products. We have refreshed our strategy in line with latest developments, being bold where we feel we can be, being mindful of who we serve, and making sure our actions are transparent, universally understood and that everyone is included.

## Our Sustainability Principles

Our sustainability principles were born out of our company values and culture.

- We respect human rights
- We prioritise equity and inclusivity
- We have a positive impact on our local communities
- We are reducing our climate change impact
- We deliver 'Kinder' products
- We embrace circularity

## Our Key Priorities

Our key priorities have been developed by assessing our values, our materiality, accepting our role in helping our industry reduce its overall impact and our ability to influence.

- Embed 'Kind to Our Core' principles across our value chain and product
- Be climate-positive by 2040
- Have our GHG-reduction targets approved by the SBTi and roadmap aligned to TCFD methodology
- Deliver fair wages and safe working conditions for everyone
- Increase transparency and provide comparable data by SASB reporting
- Recognise and address the needs of the communities we serve
- Ensure inclusivity runs through everything we do



# Materiality

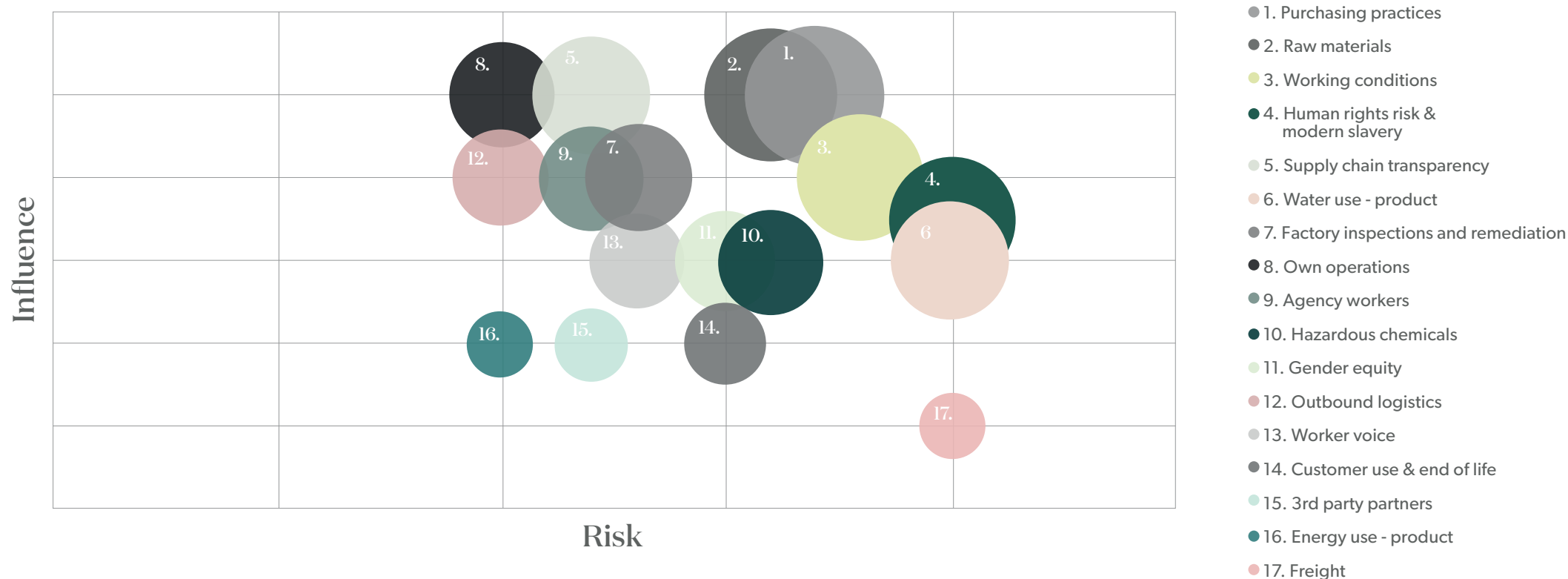
## Environmental and Social

New Look have conducted a materiality review and risk assessment, through our Environmental and Social Management System (ESMS), this highlighted our salient social and environmental risks, our ability to influence and in turn, our strategic priorities.

Our methodology is based on a cross section of assured indexes, including: the European Bank for Reconstruction and Development (EBRD), the Organisation for Economic Co-Operation and Development (OECD)

Due Diligence Guidance for Responsible Business Conduct, the Higg Material Sustainability Index, the Climate Change Performance Index, the ITUC Global Rights Index and Sedex's Supplier Risk Assessment Tool.

We have then mapped our own data and information onto these, further evaluating our risk assessments and prioritisation through the lens of severity of harm and likelihood.





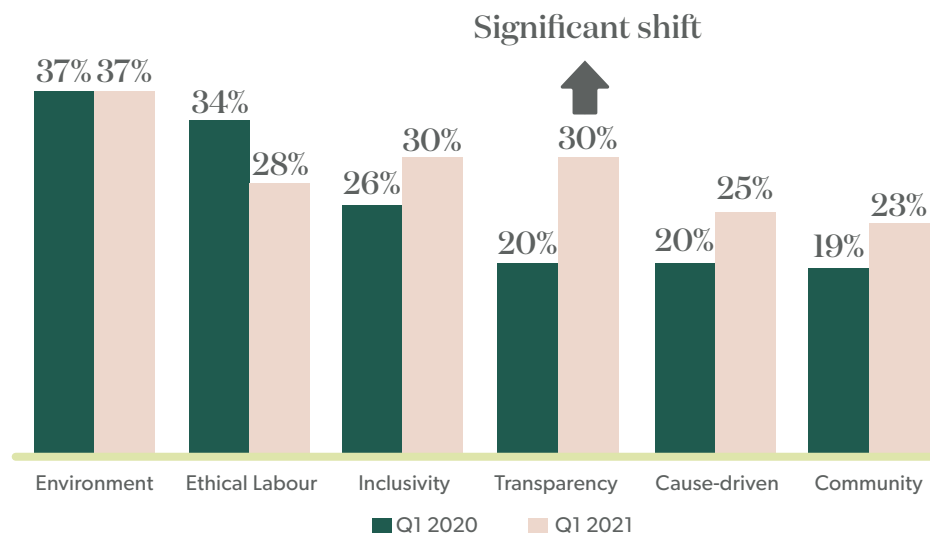
Our mapping of salient risks shows that there are several areas of high social and environmental risk that New Look can directly influence such as purchasing practices, raw materials and working conditions. Within areas deemed medium risk, our ability to influence remains high, for example in own operations and how transparent our supply chains are. This mapping has also identified some high-risk issues such as freight and water use where our ability to influence and change these remains limited, so we are exploring how best to work collaboratively, where possible, to increase our influence in these areas. These materiality outcomes have helped formulate and guide where New Look are as a business today, and how to prioritise our resources to reduce our social and environmental impacts going forward. We will review these risks regularly and make changes as needed to continue progressing.

### Our Communities

A separate materiality review was conducted to identify priorities within the people focused aspects of our own operations. Using data from customer insight and employee engagement surveys, consulting industry experts and engaging wider stakeholders. The assessment has identified what our own New Lookers, (our people) and our customers considered important as well as our opportunity to influence, and we have used these priorities to drive our strategy.

**Although environment remains the top issue of importance to our target customer, there has been the most significant shift in transparency as a key issue**

% issue is important to me  
Woman 18-44 (aware of New Look)



WSGN ask shoppers which retailers do they associate with:

Environment: Q helping to protect the environment

Ethical labour: Q having ethical labour practices

Inclusivity: Q being meant for people of all cultures and races

Transparency: Q offer transparency in how clothes are made

Cause-Driven: Q not being afraid to support important causes

Community: Q giving back to the community in some way

\*As per WGSN Barometer 18-44 Women, quarterly data in Jun 2021



## Key Social and Environmental Impacts of an Apparel Manufacturer and Retailer

### Purchasing Practices – supplier KPIs, capacity building and working with third party partners

The OECD, in conjunction with their work on responsible supply chains in the apparel and footwear sectors, outline how poor purchasing practices from brands can mean up to 22% lower wages for workers, meanwhile responsible pricing is associated with nearly 10% higher wages.<sup>i</sup> Buyer purchasing practices can prevent supplier compliance and put the lives and dignity of workers at significant risk.<sup>ii</sup>

Poor purchasing practices have been linked to negative social impacts in factories through increasing time pressures. This often leads to excessive overtime, failure to pay wages, unauthorised subcontracting, and increased use of temporary labour. Lack of capacity building with suppliers and in brand buying teams, paired with unrealistic KPIs, contribute toward potential exploitative conditions to meet volume and product requirements with short lead times. These potential risks are amplified when working with third party brands, as the leverage to influence diminishes but the risks remain high.

### Raw Materials

Raw materials present significant environmental and social risks which vary between material types but also have many commonalities. Generally, most raw materials production has potential to

impact human rights, working conditions, fair wages, deforestation, water use and chemicals. Some materials have more specific impacts for example, forced labour within the cotton industry came into focus with the emergence of issues in the Xinjiang region, China, as well as historical and continued forced labour within Turkmenistan and Uzbekistan. Deforestation and chemical use within the viscose supply chain are also significant. Other risks to be considered include, poor animal husbandry and cruel practices in farming. The conditions under which minerals are extracted and the effects on biodiversity and human health.

### Working Conditions - living wage, working hours and health & safety

The workplaces associated within the textiles and footwear sectors come with instances of exploitative practices, with long hours, low wages, denial of trade union rights and significant risks to workers health and safety through unsafe buildings.<sup>iii</sup> The industry lacks consensus on Living Wage calculations.

### Modern Slavery

The International Labour Organisation (ILO) estimates at any given time, more than 40 million people are in modern slavery, with nearly 25 million of those in forced labour. That translates to 5.4 victims for every 1,000 people, of these, 1 in 4 victims are children.<sup>iv</sup> Forced labour within supply chains is a high risk, from the farms picking cotton to the factories assembling products and the warehouses distributing them. Legislation in the UK and increasingly other countries have helped to bring justice and make businesses accountable, but so much more needs to be done to prevent, mitigate and remediate these risks across the industry.



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## Supply Chain Transparency, New Sourcing Routes and Management of Suppliers

Transparency and visibility through the supply chain remains problematic. Many brands have become more open, but many still lack visibility or remain protective of their information. Transparency levels hinder collaboration and sourcing route development and has a knock-on effect in supplier management. Given the nature of apparel sourcing systems, sites are often thousands of miles away from main offices and are not owned by brands – meaning that keeping track of these supply chains in a transparent way has evolved to be both complex and costly.<sup>v</sup>

### Water Use

Nearly half the global population are already living in potential water scarce areas at least one month per year and this could increase to some 4.8–5.7 billion (69%) in 2050.<sup>vi</sup> It is predicted that around 73% of those people affected live in Asia, where 32% of the world's exported clothing comes from.<sup>vii</sup>

### Own Operations

Although the UK has transitioned to cleaner energy, the environmental impacts of air pollution, climate change and on biodiversity all remain and additional impacts around availability and storage of energy are set to become bigger issues. In addition, inefficient waste management following a linear take-make-waste system is still prevalent. In 2018, less than half of the total waste produced in the UK was recycled, the majority was either incinerated or sent to landfill.<sup>viii</sup> This leads to resource depletion, GHG emissions, soil degradation and air pollution.

### Agency Workers and Vulnerable Groups

Agency and temporary workers often fall through the cracks around labour protections when compared to permanent workers. The nature of relationships between workers, recruiters and employers using the

labour, create risks around how workers are recruited and paid and opens opportunity for forced labour or debt-bondage. Accountabilities can be passed to agency versus employer and transparency can become clouded. Within warehouse environments, zero-hour contracts are often used creating instability and absolve responsibilities around worker protections from both the agency (labour provider) and the employer (labour user).

### Factory Inspections and Remediation

Factory safety and time needed to remediate and resolve issues presents ongoing risk in the apparel sector. The devastation of the Rana Plaza factory collapse in 2013 showed the importance of not just relying on one mechanism to check what was in place, but the necessity for follow-up to check issues are resolved. Contracted factories and their activities are now better understood but appropriate inspections, beyond Tier 1 and deeper into the supply chain, to spinning mills and dye houses are still insufficient due to the current complexity.

### Hazardous Chemicals

Chemicals used within the value chain from raw material to the finished product can have serious environmental impacts if not managed. Poor chemical management practices and lacking Personal Protective Equipment and training impact health and safety of workers and communities, and affects biodiversity, soil health, eutrophication and water pollution.

### Freedom of Association and Worker Voice

According to the ILO's report, Integrated Strategy on Fundamental Principles and Rights at Work 2017-202,<sup>ix</sup> "More than 40 per cent of the world's population live in countries that have ratified neither ILO Convention No. 87 on freedom of association nor Convention No. 98 on collective bargaining; and in many countries that have ratified them, violations of these rights persist in law and practice". Trade unions and collective bargaining

are at the heart of representative worker voice, but in the majority of the world's countries, the history of the movement has meant it can often be dangerous for workers to be associated with unions, even though it is those trade unions that have brought about so many of the working norms we've come to expect today. Even access to freely elected worker committees is increasingly difficult to find, limiting opportunities of collective voice for workers to share their concerns and be protected.

### Gender Equity

Approximately 190 million women work in global supply chains that supply the world's clothing, goods and food.<sup>x</sup> The reality of their working conditions include power imbalances between management and colleagues, sexual harassment and violence and excessive working hours often on top of care responsibilities. These cannot be ignored when trying to address and influence change.

### Outbound Logistics

Transportation of goods to warehouses, stores and homes has a significant impact on the environment both in terms of GHG emissions as well as air pollution. In 2019, transport accounted for 27% of the UK's carbon emissions.<sup>xi</sup> In addition, despite the general improvement of air quality of recent years, in many places it remains harmful to health, especially in built up areas.<sup>xii</sup>

### Customer Use and End of Life

Customer use of clothing represents 20% of the total emissions within the life cycle of a product<sup>xiii</sup> consuming significant amounts of energy and water. We are producing and consuming fashion at a faster rate than we ever have before and the vast majority of this is not being recycled. In 2016, 300,000 tonnes of clothing ended up in household waste, either being disposed of at landfill or incineration.<sup>xiv</sup>

## Energy Use

During the manufacturing stage, varying amounts of energy are used and from differing sources, some with higher environmental impacts than others. Energy reduction is required across the world to limit the effects of climate change caused by the release of GHGs.

## Freight

Movement of goods between factories from cradle to gate as well as freight via air, land and sea, can cover many miles and use multiple modes of transport making it high risk. In addition, the lack of visibility of this process within the value chain gives rise to social impacts such as working conditions, wages and fair remuneration. However, New Look has relatively low control over use and improvements within freight and it has therefore received a lower priority ranking.

## Diversity and Inclusion

Diversity and inclusion research makes it increasingly clear that companies with more diverse workforces perform better financially.<sup>xv</sup> Failure to drive a policy or culture of diversity and inclusion means missed opportunities. Effectiveness of individuals, teams and the whole organisation can be adversely affected: not hiring the best candidate, stifling innovation when not choosing from a diverse talent pool, missing out on unexpected perspectives and failure to best represent the customer.

People not able to be themselves at work feel undervalued, and their wellbeing is affected. There is a tendency to link diversity and inclusion with Race and Gender, and other protected characteristics under the Equality Act 2010. It is against the law to discriminate against someone because of a protected characteristic. However, there are infinite dissimilarities and the need for inclusion requires people to be treated as individuals.

## Local Impact

Local refers to the recognition that communities/ groups exist across a brand's customer base. Failure to recognise these communities or alienate communities and their needs across product, service and accessibility means lost opportunity, possible reputational damage, loss product relevance, poor customer experience, lack of trust in the brand or loss of market share. With digital engagement increasing, there needs to be a recognition of both physical and digital communities. The growing power of social media influence can bring opportunities but also accelerate and magnify risks.

## Product Liability

Brands have a legal and moral obligation to ensure products placed on the market are safe and fit for purpose. Failure to effectively manage product quality and safety can lead to customer injury, prosecution, fines and reputational damage. At a minimum this leads to compensation costs, loss of sales, withdrawal and/or recall cost. As a supplier of goods to third party partners and goods entering international markets, it is increasingly important that goods are globally compliant, and appropriate contracts are in place. This includes ensuring product assortments are appropriate to the markets they are entering. Complexity of business structure means that an organisation is subject to an equally complex legal and regulatory framework. Breaches of regulations or legal requirements can lead to significant fines and reputational damage. Compliance issues arising from numerous and potentially conflicting international legal standards, regulations and policies can adversely affect a financial position or business operations.

## Corporate Governance

Corporate governance are the actions and processes which set a framework for Directors to be held accountable for business operations. Poor corporate governance can lead to issues such as corruption, negligence, fraud and lack of accountability.



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# Strategy

We have created a strategy to deliver on the Kind to Our Core vision, principles and priorities. This strategy has created four pillars of focus: Responsible Business, Responsible & Circular Product, Inclusive Culture, and Positive Local Impact.

Responsible Business is our core pillar, it's the engine of our brand, Positive Local Impact is our overriding focus and informs all we do, Responsible & Circular Product drives our commitment to reduce social and environmental impact and plays our part in wider industry transformational change and Inclusive Culture is ensuring we are embracing difference and welcoming everyone.

The pillars each follow the same cascading structure:

- an overarching aim
- clear targets
- key performance indicators (KPI's) to drive progress
- an outline of how we will deliver on our targets
- supporting documentation we have/will have in place to ensure consistent standards and efficiency



# Pillar 1

## Responsible Business

### Overarching Aim

To prioritise our people and our environmental impacts and do so with growing transparency.

### Key Impacts

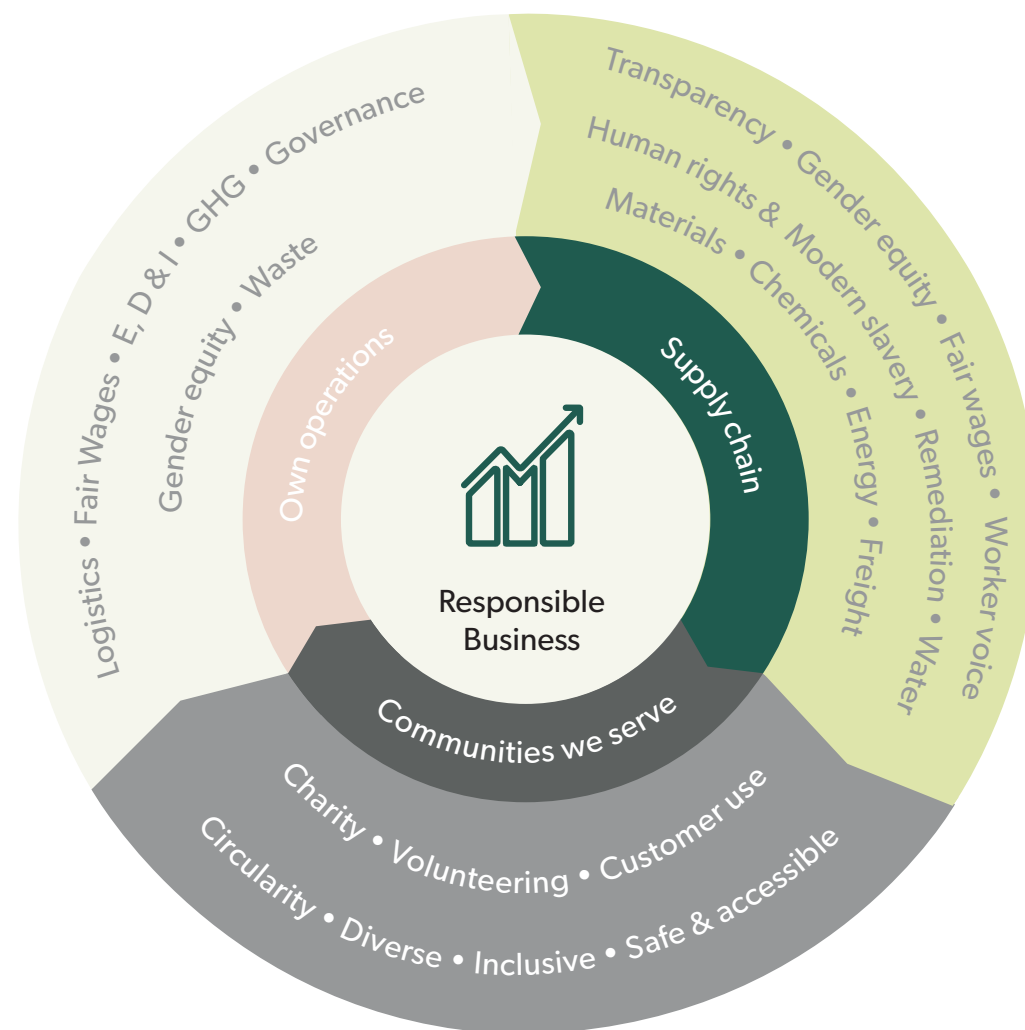
#### Environmental:

Air pollution  
Energy  
GHG  
Hazardous waste  
Marine impacts  
Soil health  
Waste management  
Water quality  
Water use  
Marine impacts

#### Social:

Human rights risk  
Working conditions  
Wages  
Worker voice  
Gender equity  
Modern slavery

<b>5 GENDER EQUALITY</b> 	New Look aligns to end all forms of discrimination against women & girls globally, ensuring women's equal opportunities for leadership	<b>6 CLEAN WATER AND SANITATION</b> 	We are committed to improving water quality by reducing release of hazardous chemicals & materials; substantially increase water-use efficiency to address water scarcity
<b>10 REDUCED INEQUALITIES</b> 	We empower & promote the inclusion of all, irrespective of age, sex, disability, race, ethnicity, origin, religion, economic or other status	<b>13 CLIMATE ACTION</b> 	New Look deliver reduced climate change impacts & promote changes to the habits of all associated with us
<b>14 LIFE BELOW WATER</b> 	We work to reduce negative impacts of land-based activities on the sustainability of our oceans	<b>15 LIFE ON LAND</b> 	New Look accepts responsibility to reduce the impact of our product and operations on ecosystems and biodiversity. We will make responsible decisions to halt & reverse forest degradation, contributing to new and replanting trees.
<b>8 DECENT WORK AND ECONOMIC GROWTH</b> 	New Look will: promote resource efficiency & support healthy environments in the communities from which we source; promote decent work for all & equal pay for work of equal value; take a stance to eradicate forced labour & end human trafficking & child labour; protect labour rights & promote safe and secure working environments; work with employers to expand access to financial services for all		





<b>Pillar 1 - Responsible Business Targets</b>	<b>Pillar 1 - Responsible Business KPI's</b>
<p><b>Transparency</b></p> <ul style="list-style-type: none"> <li>• We will publish full visibility of all suppliers through to Tier 2 by FY23</li> <li>• We will publish full visibility of our cotton, viscose and polyester supply chains to Tier 3 by FY23 (Equates to 75% of our raw materials)</li> <li>• 80% of our factories and associated sites (Tiers 1 &amp; 2) by volume to have measured and evaluated their environmental performance by FY23</li> <li>• To identify agency workers and any other vulnerable groups across our Tier 1 supply chains by FY23, informing a targeted approach in addressing their specific risks</li> <li>• To establish a formal requirement for any 3rd party brand working with us to share visibility of the factories they work with (Tier 1) to facilitate normal business practice by FY22</li> </ul> <p><b>Governance</b></p> <ul style="list-style-type: none"> <li>• All New Look Directors and Senior Managers to report against the Targets they directly influence.</li> <li>• All New Look colleagues to have at least one sustainability related KPI by the end of 2022</li> </ul> <p><b>Climate Change</b></p> <ul style="list-style-type: none"> <li>• Climate Positive by 2040</li> <li>• Commit to Science Based Targets (SBTi) FY22</li> <li>• Targets and action plan ratified by SBTi by 2024</li> </ul> <p><b>Own Operations</b></p> <ul style="list-style-type: none"> <li>• 100% LEDs to be used in any new buildings or stores</li> <li>• Transition to LEDs in all office buildings, stores and DCs by 2030</li> <li>• Only low impact refrigerant gases (max 150GWP) for all new refrigeration installations</li> <li>• Transition to low impact refrigerant gases by 2030</li> <li>• Advanced fuel efficiency programmes for fleet and drivers by 2023</li> <li>• Introduce electric and/or hybrid vehicles for staff by 2022</li> <li>• Introduce a carbon literacy programme, training all managers and senior managers by FY22</li> </ul>	<p><b>Transparency</b></p> <ul style="list-style-type: none"> <li>- % Tier 1 sites completing Higg FEM</li> <li>- % Tier 1 sites verifying Higg FEM completion</li> <li>- % Tier 2 sites completing Higg FEM</li> <li>- % Tier 2 sites verifying Higg FEM completion</li> <li>- Number of completed questionnaires for Tiers 2 &amp; 3</li> <li>- % of tier 2 suppliers mapped</li> <li>- % of cotton, viscose and polyester tiers fully mapped</li> <li>- % of agency workers in our own operations</li> <li>- % of agency workers in our supply chains</li> <li>- Number of 3rd party brands working transparently via sharing Tier 1 information</li> <li>- Number of factories visited by a representative of New Look</li> </ul> <p><b>Governance</b></p> <ul style="list-style-type: none"> <li>- Number of staff FTE responsible for sustainability strategy and implementation</li> <li>- Number of staff involved in social and green initiatives across the business</li> <li>- Teams involved in sustainability</li> </ul> <p><b>Climate Change</b></p> <ul style="list-style-type: none"> <li>- Public commitment to SBTi</li> <li>- Targets and action plan ratified by SBTi by 2024</li> <li>- % employees trained in carbon literacy</li> <li>- Carbon reduction YOY against a 21/22 baseline</li> <li>- % change in CO2e emissions Scope 1 &amp; 2 from baseline 19/20</li> <li>- % change in electricity intensity (kWh per sqft retail space) from baseline 19/20</li> </ul> <p><b>Own Operations:</b></p> <ul style="list-style-type: none"> <li>- % LEDs in all new buildings (stores, offices, DCs)</li> <li>- % buildings transitioned to LED (stores, offices, DCs)</li> <li>- % low impact refrigerant gases (max 150GWP) for all new refrigeration installations</li> <li>- % of old HVAC to be transitioned to low impact refrigerant gas</li> <li>- % water reduction in own operations against a 2021 baseline m3/FTE</li> <li>- % advanced fuel efficiency programmes for retailer fleet and drivers</li> <li>- % of waste recycled of all waste in own operations per employee (FTE)</li> <li>- % waste sent to RDF (refuse derived fuel) facility</li> <li>- number of electric and hybrid vehicles and charging bays from a 2021 baseline</li> </ul>

Pillar 1 - Responsible Business <b>Targets</b>	Pillar 1 - Responsible Business <b>KPI's</b>
<p><b>Customers and Colleagues</b></p> <ul style="list-style-type: none"> <li>Helping our employees and customers to live low carbon lifestyles by FY25</li> </ul> <p><b>Freight/Logistics</b></p> <ul style="list-style-type: none"> <li>Engaging in developments in low carbon logistics for inbound and outbound logistics</li> <li>Reduce air freight, increasing use of sea, land, and rail YOY against FY21/22 baseline</li> <li>Collaborate with freight partners and wider industry bodies on tackling modern slavery risks.</li> </ul> <p><b>Hazardous Chemicals</b></p> <ul style="list-style-type: none"> <li>80% of our factories and associated sites (Tiers 1 &amp; 2) by volume with good chemical management systems by FY24</li> </ul> <p><b>Gender Equity</b></p> <ul style="list-style-type: none"> <li>Women's empowerment and workplace progression: Increase the number of women workers in leadership positions in Tier 1 factories by FY24</li> </ul> <p><b>Goods and Services Not for Resale (GNFR)</b></p> <ul style="list-style-type: none"> <li>Sustainability clauses to be included within contracts by 2022</li> </ul> <p><b>Working Conditions</b></p> <p><b>Purchasing Practices</b></p> <ul style="list-style-type: none"> <li>Implement ACT accountability and monitoring framework for purchasing practices by FY22</li> <li>Labour costs visible in sourcing and buying decisions across all product areas by FY23</li> </ul>	<p><b>Customers and colleagues</b></p> <ul style="list-style-type: none"> <li>% of Kind products purchased against overall product volumes</li> <li>Number of customers engaged with Kind education campaigns</li> </ul> <p><b>Freight/Logistics</b></p> <ul style="list-style-type: none"> <li>% outbound logistics providers with carbon reduction targets</li> <li>% reduction in air freight from 2021/22 baseline</li> <li>Active engagement with one or more freight sustainability groups</li> <li>Number of initiatives existing on modern slavery and how many are NL engaged with</li> </ul> <p><b>Hazardous Chemicals</b></p> <ul style="list-style-type: none"> <li>% of top suppliers (80% of products) achieving level 2 in chemical management module of Higg FEM or other similar assessment</li> </ul> <p><b>Gender Equity</b></p> <ul style="list-style-type: none"> <li>% of women in leaderships positions in our own operations</li> <li>Number of women workers in our Tier 1 factories in leadership positions</li> <li>Number of relevant trainings conducted to support leadership development</li> </ul> <p><b>Goods and Services Not for Resale GNFR</b></p> <ul style="list-style-type: none"> <li>Number of contracts changed to include sustainability clauses</li> </ul> <p><b>Working Conditions</b></p> <p><b>Purchasing Practices</b></p> <ul style="list-style-type: none"> <li>Number of trainings conducted</li> <li>Disclosure of ACT Purchasing Practices Self-Assessment (How we think we're doing)</li> <li>Disclosure of ACT Purchasing Practices Assessment (How our suppliers think we're doing)</li> <li>New Look performance against ACT brands aggregate score</li> </ul>



Pillar 1 - Responsible Business <b>Targets</b>	Pillar 1 - Responsible Business <b>KPI's</b>
<p><b>Working Conditions Continued</b></p> <p><b>Fair Wages</b></p> <ul style="list-style-type: none"> <li>• To establish a methodology and conduct feasibility studies across three priority countries FY23</li> <li>• To contribute to the 2021/2022 ACT roadmap</li> </ul> <p><b>Human Rights Risk, Modern Slavery and Worker Voice</b></p> <ul style="list-style-type: none"> <li>• Incorporate and implement an enhanced human rights due-diligence based approach in line with the UNGPs by FY24</li> <li>• Expand on New Look's beyond audit approach with key partners in the next five years</li> <li>• To lead change where it is required and to meet our obligations to ensure Modern Slavery and Human Trafficking do not exist in any part of our operations or supply chains</li> <li>• Enhance accessibility to effective grievance mechanisms</li> </ul>	<p><b>Fair Wages</b></p> <ul style="list-style-type: none"> <li>- Fair Wage feasibility study completed in three priority countries</li> <li>- Wages currently being paid in factories we are working with vs fair wage index (where available)</li> <li>- Number of collective bargaining agreements in place</li> </ul> <p><b>Human Rights Risk, Modern Slavery and Worker Voice</b></p> <ul style="list-style-type: none"> <li>- Number of whistleblowers reporting issues</li> <li>- % of grievance mechanisms existing and improving</li> <li>- Number of suppliers engaged on beyond audit agenda</li> <li>- Monthly discussions with key points from across teams shared in Modern Slavery working group meetings</li> <li>- MS KPI added to each team involved in MSWG, particularly GNFR</li> <li>- Number of mechanisms existing</li> <li>- % increase in the access to worker voice mechanisms</li> </ul>

## How We Will Deliver

### Higg FEM - what is the Higg FEM and why do we use it?

The Higg Facilities Environmental Module (FEM) assesses the environmental impacts of a manufacturing facility, covering environmental management systems, energy, water, waste, wastewater, air emissions and chemical management. The module benefits both brands and manufacturers, creating a standardised method for annual audits which allows clear and simple identification and prioritisation for continuous improvement. New Look already require Tier 1 factories to complete the Higg FEM, and this will be extended to lower tiered sites in the coming year, where there are often higher environmental impacts. The Higg FEM forms the basis of their environmental scorecard using the scoring in each section to determine a facilities performance.

### Purchasing Practices and Fair Wages

Fair wages and their inherent link to effective and collaborative purchasing practices are fundamental in understanding how to effectively move forward. Since its inception, New Look has been working with ACT to improve wages in the industry by establishing industry collective bargaining in key garment and textile sourcing countries, supported by responsible purchasing practices. Working with ACT and other industry initiatives such as the Ethical Trading Initiative, Sustainable Apparel Coalition and the British Retail Consortium has kickstarted our wider work in addressing the role purchasing practices has across the way we source and buy.

To build on the work we have done to date and support our targets. Currently, we are rolling out training on better buying practices to support opportunities for fairer, ideally living wages to be paid, conducting factory visits for junior buyers to support development, and buying more sustainably. We have sustainability metrics included for buyer progression, building capacity of key suppliers and supporting industry initiatives on wage improvements. We will expand open costing to all product types, incorporate sustainability KPIs with buyers, restart wage reviews for priority countries, and conduct a feasibility study with an intention to implement next steps thereafter on wage related activities.

### Working Conditions

New Look's social sustainability programme has been in place for the last 20 years, with each year bringing on new lessons and innovations. We have long believed that audits are a tool which can provide a necessary snapshot of conditions at scale but are not the full solution to address working condition concerns. We aim to collaborate with our suppliers, factories, and other relevant stakeholders to solve problems together rather than a top-down approach.

We work with high-risk sites to remediate and resolve issues raised, we collaborate with others in shared factories to gain leverage in addressing workers' needs, and we participate in worker focused projects to address improving conditions. We will be working more proactively through an enhanced human rights due diligence approach to address working condition concerns, target our focus in areas where we can achieve greatest influence (country



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or number of factories specific), improve our remediation rates across a greater proportion of our key sourcing countries, focused on risk ratings, and continue to build on our data monitoring and factory management work in more depth.

### Human Rights Risk and Modern Slavery

Over time, New Look has shifted from a compliance-led approach, with risk to business at its heart, to one led by Human Rights Due Diligence (HRDD). HRDD allows us to work together and more proactively with our supply chain, with opportunities to identify and mitigate actions, remediate violations where needed and continuously monitor and report.

We use risk ratings for all Tier 1 factories to inform prioritisation and remediation, we support sites to address critical issues as well as help build their capacity, updated country profiles are regularly shared across the business, buying decisions and sourcing are monitored to prevent and/or mitigate any negative impacts, bi-monthly Modern Slavery working group meetings are held, work with sector partners to facilitate risk assessments and have mandatory training across the business.

Going forward, we will be drawing on existing frameworks to support being more focused on risk to people, we will conduct human rights impact assessments where needed, review existing audit requirements to facilitate better data collection and collaborate further down the supply chain to address greater Modern Slavery risk areas such as freight and transport.

### Transparency, Third-Party Partners and Vulnerable Groups

Through transparency, we can address issues further along the value chain and work with partners to achieve social and environmental improvements. New Look has been bi-annually publishing its Tier 1 factory list since 2017 and since 2020, this now includes Tier 1+ sites. Our transparency agenda is embedded across New Look teams and is an expectation with all partners, including third party brands. Greater visibility is one of the key methods we are using to identify more vulnerable groups within our supply chains, as well as own operations, including agency workers and the risks which are inherently more present with these groups.

Transparency initiatives are at the heart of our main business activities, but we know we will need to go deeper to be able to move forward in our ambitions. We currently risk-rate and disaggregate by gender all social audit data, bi-annually update fibre intake information of viscose and cotton and we have 41% of our Tier 1 supply base monitoring their environmental impacts through Higg FEM. We will be using data both from Higg and our own systems as responsible indicators to inform direction, prioritisation and how best to engage or responsibly exit.

### Gender Equity

Based on several studies to date, we know that women in leadership roles have a knock-on effect on productivity, efficiency, worker retention and overall worker morale. Currently, New Look has addressed gender



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equity from a data focused approach to date through disaggregated data monitoring and participation in gender specific projects. Going forward, we will be addressing our own operations and women in leadership positions, working with our key suppliers to identify target countries and factories to implement gender led programmes, including needs assessments to identify priorities, researching, and assessing relevant programme models to be joined; and exploring lessons from our own operations to be applied in the supply chain.

### Worker Voice

The most effective tool to understand what is happening in workplaces is to hear from workers themselves. Fair representation is critical - the choice to freely associate with a trade union, participate in collective bargaining or appoint freely elected representatives for a worker committee. The global statistics around freedom of association are regularly at risk.

Currently, through our ethical aims and ways of working we expect and work with our suppliers to have an enabling environment for workers representation and access to effective grievance mechanisms when required. We will be working on operationalising freedom of association more effectively within our supply chain through existing industry tools, gathering data on existing grievance mechanisms to facilitate improvement and collaborating where possible on upcoming industry initiatives.

### Climate Change – Own Operations, Customers, and Colleagues

Climate change remains the biggest challenge facing the planet and will have direct consequences on the fashion industry if action is not taken. As a responsible business, New Look are committed to reducing emissions through defined work streams. Currently, as signatories of the BRC Climate Roadmap, New Look are working across the industry to support retail to reach Net Zero Carbon by 2040. The pathways within this roadmap cover putting GHG data at the core of business decisions, operating efficient sites with renewables, zero carbon logistics, sustainable sourcing of raw materials and helping customers to live low carbon lifestyles. This work paired with our science-based targets will help us to deliver on our commitments toward carbon neutrality.





## Outbound Logistics and Freight

Last year New Look calculated scope 3 carbon data, including real data from inbound and outbound logistics, allowing understanding and comparison of modes of transport and their impact on New Look's carbon footprint. Despite having little control over inbound logistics, the supply chain analyst team are using the data to reduce the amount of air freight used within the business and have created a carbon calculation tool that will be used by buyers at the point of order to demonstrate the difference in carbon emissions depending on mode of transport selected. This, along with an overarching strategy to reduce air freight where possible, will support New Look to reduce carbon emissions.

## Factory Inspections and Remediation

Working closely with the factories with whom we source to support building their capacity and addressing critical issues as and when they come up, is at the core of our work within our supply chains. Industry innovation, such as the International Accord on Health and Safety, have provided the necessary framework to facilitate greater inspections and remediation at scale in Bangladesh with plans for international expansion.

Currently, we work with them to continuously improve, supporting on the most critical areas so that worker safety and environmental protection are at the forefront of our relationship, alongside price, quality, and volumes. We use our leverage in sites when necessary and collaborate with other brands to achieve change. Going forward, we will support our key suppliers to build capacity in sustainability and how to translate this into factory relationships, take lessons from different countries to apply elsewhere when remediation has worked well and increasing our involvement in remediation.

## Supporting Policies and Plans

To support our sustainability strategy and wider business governance, we have issued a number of policies and plans. A full list can be found on our corporate website. Suppliers are also required to commit to these policies.

- Code of Ethics
- Anti-Slavery and Human Trafficking policy
- Child Labour policy
- Homeworking policy
- Human Rights Statement
- Migrant and Contract Worker policy
- Refugee policy
- Subcontracting policy
- Uzbek and Turkmenistan Cotton policy
- Xinjiang Uyghur Autonomous Region Sourcing
- Animal Welfare policy
- Raw material- Cotton policy
- Raw material- Wood based policy
- Raw material- Mica policy
- Raw material- Palm Oil policy
- Chemical management policy
- Environment policy



## Pillar 2

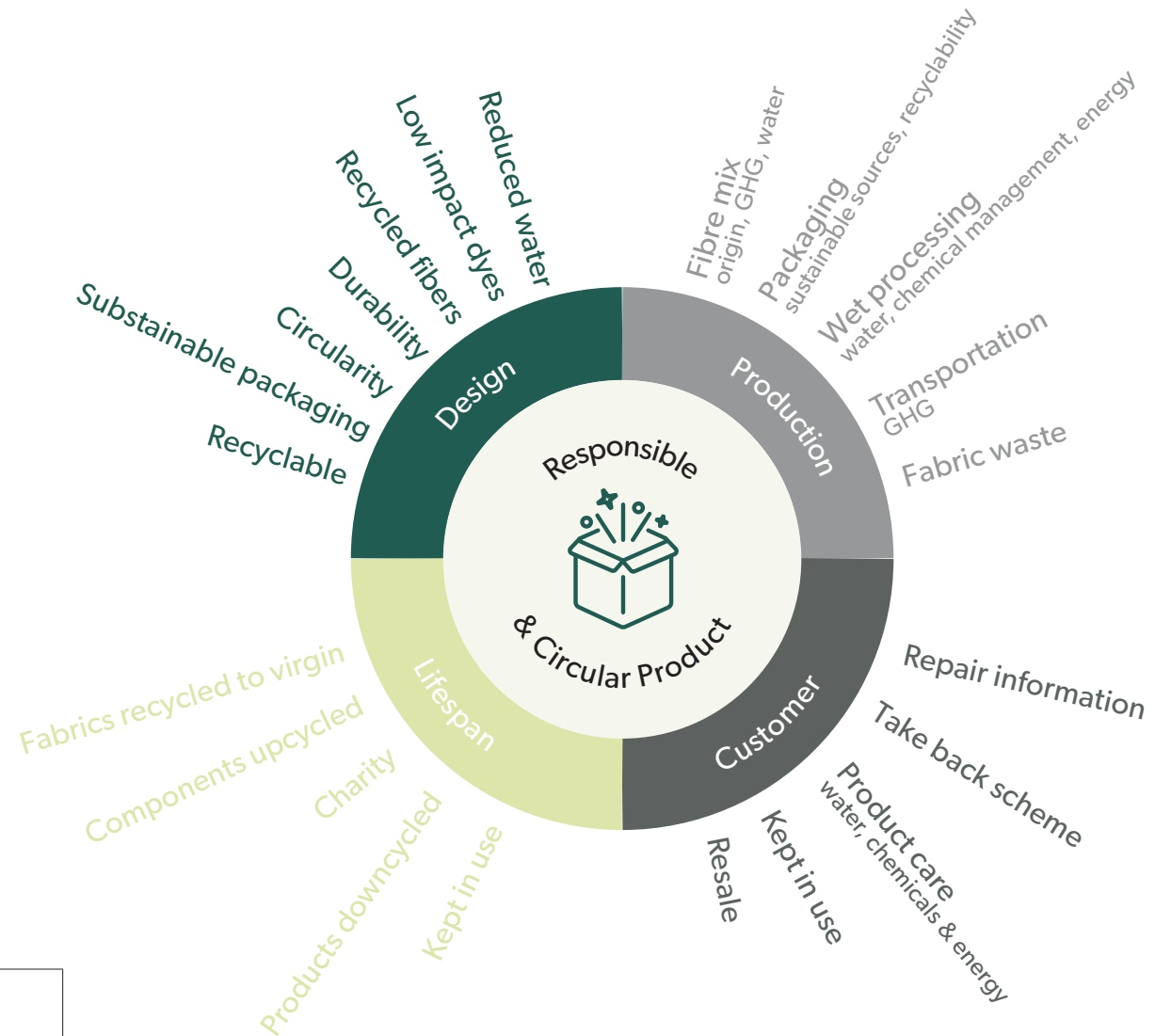
### Responsible & Circular Product

#### Overarching Aim

To improve the environmental impacts and circularity of our products from design stage to product end of life

#### Key Impacts

Environmental:  
 Air pollution  
 Biodiversity  
 Chemical impacts  
 Deforestation  
 Energy  
 GHG  
 Hazardous waste  
 Marine impacts  
 Soil health  
 Waste management  
 Water quality  
 Water use



<b>12</b> RESPONSIBLE CONSUMPTION AND PRODUCTION 	We will not be wasteful & will promote the environmentally sound management of chemicals & all waste throughout its life cycle
<b>15</b> LIFE ON LAND 	New Look accepts responsibility to reduce the impact of our product and operations on ecosystems, and biodiversity. We will make responsible decisions to halt & reverse forest degradation, contributing to new and replanting trees.



<b>Pillar 2 - Responsible &amp; Circular Product Targets</b>	<b>Pillar 2 - Responsible &amp; Circular Product KPI's</b>
<p><b>Raw Materials</b></p> <ul style="list-style-type: none"> <li>• 100% Sustainable Cotton by FY22</li> <li>• 100% Sustainable Viscose by FY23</li> <li>• 50% of our synthetics will be recycled fibre FY24</li> <li>• &gt;30% of product will have &gt; 25% recycled content FY24</li> <li>• 50% reduction in conventional Polyurethane (PU) Footwear and Accessories by FY24</li> <li>• Invest, test, and explore innovative 'Kind' materials</li> </ul> <p><b>Products</b></p> <ul style="list-style-type: none"> <li>• Provide circular design training for all designers by FY22</li> <li>• We will reduce the GHG footprint of products by 50% (aggregate) by 2030</li> <li>• We will reduce the water footprint of products by 30% (aggregate) by 2030</li> </ul> <p><b>Water Use – Product</b></p> <ul style="list-style-type: none"> <li>• 80% of our factories and associated sites (Tiers 1 &amp; 2 ) by volume to have measured and set targets to reduce water consumption by FY23</li> </ul> <p><b>Energy Use - Product</b></p> <ul style="list-style-type: none"> <li>• Gather Tier 1 manufacturing GHG data from top suppliers (80% of our products) by FY23</li> <li>• Initiate environmental programmes with Tier 1 and 2 suppliers to accelerate their decarbonisation activities to 2025 (and beyond)</li> </ul> <p><b>Packaging</b></p> <ul style="list-style-type: none"> <li>• 100% of packaging will be sustainably sourced or have recycled content by FY23</li> <li>• Reduce total tonnage of packaging YOY against FY21/22 baseline</li> <li>• Increase amount of packaging recycled and subsequently remade into new packaging against FY21/22 baseline</li> <li>• Invest, test and explore innovative packaging materials</li> </ul> <p><b>Customer Use and End of Life</b></p> <ul style="list-style-type: none"> <li>• Promote circularity of our products by educating customers on product care</li> <li>• Promote and provide end of use options and increase takeback schemes</li> <li>• Invest, test and explore innovative repurposing and recycling of textile materials</li> </ul>	<p><b>Raw Materials</b></p> <ul style="list-style-type: none"> <li>- % sustainable cotton of total cotton tonnage (x% cotton units)</li> <li>- % sustainable viscose of total viscose tonnage (x% viscose units)</li> <li>- % recycled synthetics of total synthetics tonnage (x% synthetics units)</li> <li>- % total products with recycled content</li> <li>- Number of new 'Kind' materials used within ranges</li> </ul> <p><b>Products</b></p> <ul style="list-style-type: none"> <li>- % designers with circular design training</li> <li>- % carbon reduction from better materials, design and end of life</li> <li>- % water reduction from better materials, design and end of life</li> </ul> <p><b>Water Use - Product</b></p> <ul style="list-style-type: none"> <li>- % of top suppliers (80% of products) with calculated water use and reduction targets</li> </ul> <p><b>Energy Use - Product</b></p> <ul style="list-style-type: none"> <li>- % of top suppliers (80% of products) providing manufacturing GHG data</li> <li>- Number of environmental programmes initiated with Tier 1 suppliers to accelerate their decarbonisation activities to 2025 from a (2021/22 baseline)</li> </ul> <p><b>Packaging</b></p> <ul style="list-style-type: none"> <li>- % of packaging sustainably sourced or made with recycled material</li> <li>- % reduction to net weight of total packaging per 100,000 units bought</li> <li>- % packaging by weight being recycled and reused within new packaging</li> <li>- Number of innovative packaging materials trialled</li> </ul> <p><b>Customer Use and End of Life</b></p> <ul style="list-style-type: none"> <li>- Number of customers engaged with recycling and care content</li> <li>- Number of customers using takeback services</li> <li>- Tonnage donated clothing through take back and resale</li> <li>- Tonnes of textiles reused, upcycled, or recycled to fibre</li> </ul>

# How We Will Deliver

## Raw Materials

Transitioning to more sustainable materials is fundamental to New Look's sustainability strategy and underpins our Kind range, used on products to highlight the more sustainable styles. New Look has been targeting the increase of more sustainable materials across our three most common fibres: cotton, polyester and viscose.

Through engaging with partners, such as Textile Exchange, Canopy, BCI and Changing Markets, New Look has identified better materials and practices, and alongside other industry experts created a set of requirements that products must meet to be considered and labelled Kind (more sustainable). The Kind range has been and continues to be a catalyst for driving better raw material uptake within the business.

## Product

The manufacturing stage of a product's life cycle is often where the most significant environmental impacts occur and, as such, New Look is committed to ensuring these impacts are minimised. New Look are working closely with suppliers to map lower tiered sites, understanding where materials are being sourced and increasing the volume of their value chain using the Higg (FEM).

Through the Higg FEM, New Look can determine the environmental performance and check that the minimum requirements set out in our supplier manual are achieved.

Earlier this year New Look became partner level members of Textiles 2030, a new voluntary

agreement overseen by the Waste and Resources Action Programme (WRAP). The goal of the initiative is to accelerate the fashion and textiles industry to move towards a circular economy within the UK. As partner members, New Look will be involved in implementing change, achieving global impacts, and demonstrating leadership across the three pathways: design for circularity, implement circular business models and close the loop on materials. Progress will be reported annually to achieve carbon and water use reductions within textile production.

## Water Use – Product

In 2019, New Look created a bespoke Self Assessment Questionnaire (SAQ) with the support of industry experts to begin to gather water use data from Tier 1 and beyond Tier 1 sites, focusing on wet processors. This data informed New Look of sites implementing best practices and mills with low water use technologies which was used to inform sourcing decisions. At the same time New Look became members of the SAC and began onboarding suppliers with Higg FEM. As the programme has developed over time, New Look will be utilising the data and benchmarking data from Higg FEM to inform sourcing strategies.

## Energy Use - Product

New Look use the Higg FEM to gather energy data from manufacturing facilities. Since joining, New Look have increased the percentage of Tier 1 & 2 factories reporting through the platform and as part of membership with the SAC are required to increase the number of facilities on the platform each year to retain membership.



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## Packaging

New Look has significantly reduced the weight of its plastic packaging through re-engineering as well as introducing recycled materials from their own waste stream. However, as the largest waste stream for retailers, packaging continues to be an issue that must be addressed. New Look's target is to reduce packaging and to achieve a circular system for all packaging used within our operations.

We work with recycling partners and industry experts to understand the impact of our packaging and make the right choices for New Look. The new Plastic Tax coming into force in April 2022 has driven New Look to make quick changes to value chain packaging, working with suppliers to transition to recycled materials. Moreover, there is a two-year initiative to review the end-to-end packaging strategy and drive further positive impacts by FY24.

## Customer Use

Customer use of a product results in 20% of the product's, emissions during the life cycle.<sup>xvi</sup> This is a significant proportion which is not under the control of a brand. New Look will be working to engage customers using storytellers/influencers to create interesting content across our digital platform, helping our customers to lower their impact and keep their clothing for longer. This content will be tracked through our digital teams so we can measure engagement.

## End of Life

New Look have over a 10-year partnership with Newlife who re-sell clothing which is no longer suitable to be sold through New Look channels. In addition, in 2019, New Look began a partnership with Hospice UK to give customers

the opportunity to donate their used garments.

However, New Look understand that circularity is hugely important as a fashion brand and a mindset that the world needs to embrace. New Look are engaging with many different partners to create a network of re-sell, leasing, upcycling, recycling to fibre opportunities which provide choice to both the customer and the business, ensuring textiles are used to their full and never end up in landfill.

## Supporting Policies and Plans

To support our sustainability strategy and wider business governance, we have issued a number of policies and plans. A full list can be found on our corporate website. Suppliers are also required to commit to these policies.

- Code of Ethics
- Anti-Slavery and Human Trafficking policy
- Child Labour policy
- Homeworking policy
- Human Rights Statement
- Migrant and Contract Worker policy
- Refugee policy
- Subcontracting policy
- Uzbek and Turkmenistan Cotton policy
- Xinjiang Uyghur Autonomous Region Sourcing
- Animal Welfare policy
- Raw material- Cotton policy
- Raw material- Wood based policy
- Raw material- Mica policy
- Raw material- Palm Oil policy
- Chemical management policy
- Environment policy



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## Pillar 3

### Inclusive Culture

#### Overarching Aim

To become an employer of choice, presenting a positively distinct and diverse culture, successfully engaging our employees, and recognised for our inclusivity.

#### Key Impacts

Equity  
Diversity  
Inclusion  
Employee engagement  
Productivity  
Wellbeing



**89%** of New Lookers say  
they can be themselves at work

<b>4</b> QUALITY EDUCATION 	We promote sustainable lifestyles, human rights, gender equality and promote a global citizenship and appreciation of cultural diversity
<b>5</b> GENDER EQUALITY 	New Look aligns to end all forms of discrimination against women and girls everywhere, ensuring women's equal opportunities for leadership
<b>10</b> REDUCED INEQUALITIES 	We empower & promote the inclusion of all, irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status





<b>Pillar 3 - Inclusive Culture</b> <b>Targets</b>	<b>Pillar 3 - Inclusive Culture</b> <b>KPI's</b>
<p><b>Understanding our Colleague Communities</b></p> <ul style="list-style-type: none"> <li>• Implement a new people system software to provide better and ongoing insights and reporting of E, D &amp; I and our demographics in 2023</li> <li>• Colleagues engaged in improving demographic data collection during 2022</li> <li>• Externally report demographic insights from FY24</li> </ul> <p><b>Resource Groups</b></p> <ul style="list-style-type: none"> <li>• Maintain E, D &amp; I effectiveness, and engagement scores through biannual survey</li> <li>• Colleague Resource groups established through our Your Voice internal engagement programme to drive engagement and contribution to employee experience strategy in 2022</li> </ul> <p><b>Board and Leadership</b></p> <ul style="list-style-type: none"> <li>• Established and embedded E, D &amp; I processes and measures across our Leadership team by the end of 2022</li> <li>• Internal dashboard to be created and established by FY23</li> <li>• Review and update relevant E, D &amp; I related policies in 2022</li> <li>• Ensure demonstrable E D &amp; I actions through people and pay practices</li> <li>• Introduce ethnicity Pay Gap Reporting by FY24</li> </ul> <p><b>Recruitment Processes</b></p> <ul style="list-style-type: none"> <li>• Complete E, D &amp; I review of recruitment processes by end of 2022</li> <li>• Programme E, D &amp; I related training, starting with senior hiring managers throughout 2022</li> <li>• Establish shortlisting across levels by the end of 2022 and then use colleague and customer demographic data to target recruitment by FY24</li> </ul> <p><b>Flexible Working and Wellbeing</b></p> <ul style="list-style-type: none"> <li>• Agree metrics to measure take up of flexible working 2022</li> <li>• Agree appropriate Wellbeing Metrics by FY23</li> <li>• Use gender pay gap reporting as a measure to contribute toward wider pay equity objectives</li> </ul>	<p><b>Understanding our Colleague Communities</b></p> <ul style="list-style-type: none"> <li>- People software in place</li> <li>- Insights and demographics data gathered (subject to local legislation)</li> <li>- External reporting ethnicity profiles and demographics</li> </ul> <p><b>Resource Groups</b></p> <ul style="list-style-type: none"> <li>- E, D &amp; I engagement scores</li> <li>- Number of ways of working changes implemented from Your Voice output FY23</li> </ul> <p><b>Board and Leadership</b></p> <ul style="list-style-type: none"> <li>- Processes and measures in place</li> <li>- Dashboard in place and providing data</li> <li>- Policies updated annually</li> <li>- Actions documented and completed in people and pay practices</li> <li>- Measures for ethnicity Pay Gap Reporting</li> </ul> <p><b>Recruitment Processes</b></p> <ul style="list-style-type: none"> <li>- Data and results from recruitment processes review</li> <li>- Number of hiring managers trained and impacts achieved</li> <li>- New Hire demographic data collected, reviewed and reported (subject to local legislation)</li> </ul> <p><b>Flexible Working and Wellbeing</b></p> <ul style="list-style-type: none"> <li>- Report against metrics for the uptake of flexible working</li> <li>- Wellbeing metrics collected and reported</li> <li>- Gender pay gap data gathered and reported annually</li> </ul>

<b>Pillar 3 - Inclusive Culture Targets</b>	<b>Pillar 3 - Inclusive Culture KPI's</b>
<p><b>Career Development Programmes</b></p> <ul style="list-style-type: none"> <li>• Talent for Tomorrow programme implemented in 2022</li> <li>• Annual E, D &amp; I training for all employees rolled out in 2022</li> <li>• Development &amp; coaching programmes established for underrepresented groups during FY23</li> <li>• Establish and implement Future Talent pipeline, focused on improving diversity annually by the end of 2023</li> </ul>	<p><b>Career Development Programmes</b></p> <ul style="list-style-type: none"> <li>- Talent for Tomorrow programme established 2022</li> <li>- Number of employees trained</li> <li>- Number of coaching initiatives for identified underrepresented groups</li> <li>- Report year on year success in the diversity of our Future Talent pipeline</li> </ul>



## How We Will Deliver

New Look is a market leader in fashion and our ambition is to match this record as an employer of choice in the way we continue to engage, develop, and support our diverse community of colleagues, or 'New Lookers' as we term everyone; all of whom are important and underpin our success.

As one of the UK's largest fashion retailers, Equity, Diversity & Inclusion doesn't just make sense for our internal community, it makes sense in the way we do business. From the development of great product and the way we select and work with partners to how we engage with our customers to offer them outstanding experience and mirror in our workforce composition the communities and people we work with and serve every day.

Over the next three years, we will accelerate our ambitions and efforts to firmly place New Look as a destination employer for Equity, Diversity, and Inclusion. To achieve this E, D & I sits at the heart of our new People and Talent Strategy and will be composed of a seven-point plan:

**1. New People Systems** to facilitate greater and more precise insight, targeting, and reporting of our evolving demographics. This will underline where we are great as well as help us take affirmative actions where improvement is needed. Enabled by new systems, our ambition is to start publishing our ethnic profile externally by 2024

**2. Resource Groups** will be established for our various and diverse communities through our 'Your Voice' Internal Engagement Process to continually listen and take feedback on how we can evolve our Ways of Working and Employee Experience to ensure we continue to build a

strong and inclusive culture

**3. Leadership Development** embedding performance processes and measures which prioritise E, D & I goals and underpin the evolution of our Board and Senior Leadership profiles.

**4. Recruitment Processes and Supplier Relationships** which look to insist and ensure a diverse representation of candidates for all opportunities

**5. Career Development Programmes** to develop the strength and diversity of our Future Talent Pipeline from early Careers via our Talent for Tomorrow programme, through to Leadership and other Development and coaching programmes for under-represented groups

**6. Flexible Working** to ensure we are attracting and retaining as broad a candidate and employee pool as possible

**7. Wellbeing Initiatives and Support** tailored to the diverse cultures and needs of our colleagues

### Understanding our Colleague Communities

New Look will continue with existing plans and partners and additional partnerships will be established to drive and achieve our inclusive culture targets. At the time of publishing this document our new people system is being finalised and our E, D & I lead is being recruited.

### Resource Groups

We are very proud that in our recent engagement survey, the overwhelming majority (89% of our workforce) felt they could be themselves at work. This reflects our ongoing commitment and ambition to create an inclusive working environment that respects everybody, along with attracting and retaining a diverse workforce.





## Board and Leadership

We will weave E, D & I actions into our talent development and succession planning. We are updating our existing E, D & I training to ensure we have well informed teams and supportive leaders. We will launch a reverse mentor programme. We will identify and develop values driven programmes via an online hub, to support accessibility for all groups. We are implementing the Business in the Community's Race at Work Charter to ensure ethnic minority employees are represented at all levels in an organisation, and we will be partnering with Retail Week's Be Inspired programme to help drive inclusivity and support colleagues' career aspirations. We are following the Halo Code as part of our continual learning on race-based hair discrimination. New Look are now a signatory to the British Retail Consortium's Diversity and Inclusion Charter and will be implementing actions from 2022.

## Recruitment Processes

We will continue to build strong relevant external partnerships based on learnings from our demographic data (e.g., Be Inspired, Stonewall, Business Disability Forum). New Look will continue to work with the LGBT Foundation a national charity delivering advice, support, and information services to lesbian, gay, bisexual and trans (LGBT) communities. To date, we have helped fund a 2021 Volunteering Programme which helps people to harness their lived experiences, build new skills and amplify impact across all the LGBTQAI+ services which exist to help ensure a safe, healthy, and equal future for all LGBTQAI+ people.

## Career Development Programmes

New Look's relationship with The Prince's Trust continues to grow, supporting social mobility; collaborating on a 'Get into Retail Programme' to help young people hone their employability skills. In the last five years, we have supported almost 300 young people, and in many cases, they have gone on to secure a job with us. We're also excited to collaborate with The Prince's Trust on new mentoring opportunities. We will identify appropriate opportunities for workplace apprenticeships and work closely with schools and colleges in developing our early careers programmes.

## Flexible Working and Wellbeing

We have started the process of demonstrating fair pay and pay equity using both internal appraisals and industry benchmarking and are looking at how best to improve wellbeing. We will be exploring fair pay and pay equity using both internal appraisals and industry benchmarking.

## Supporting Policies and Plans

To support our sustainability strategy and wider business governance, we have issued several policies and plans. A full list can be found on our corporate website.

- Anti-discrimination policy
- Anti-harassment policy
- Career break policy
- Equal opportunities policy
- Equality, diversity & inclusion policy
- Flexible working policy
- Health and wellbeing policy
- Maternity, paternity, and parental leave policies
- Gender reassignment policy



NEW LOOK



## Pillar 4

### Positive Local Impact

#### Overarching Aim

Committed to being a force for good in Fashion and our Communities: a customer obsessed brand that will always represent the full diversity of our customers and our communities.

#### Key Impacts

Localisation  
Community  
Equity  
Diversity  
Inclusivity  
Education

Change to Supporting  
local charities in  
**24** regions across  
472 stores



We promote sustainable lifestyles, human rights, gender equality and promote a global citizenship and appreciation of cultural diversity



New Look work for inclusive, safe, resilient, & sustainable communities



<p>Pillar 4 - Postive Local Impact</p> <p><b>Targets</b></p>	<p>Pillar 4 - Postive Local Impact</p> <p><b>KPI's</b></p>
<p><b>Our Customer Communities</b></p> <ul style="list-style-type: none"> <li>• Map demographics of the local communities we serve via our stores and digital channels by the end of 2022</li> <li>• Develop a roadmap of local and digital activities to represent the diversity of our customers by FY23</li> <li>• Identify under-represented groups and understand how we can best serve them by FY23</li> </ul> <p><b>Representing Our Customers</b></p> <ul style="list-style-type: none"> <li>• Ensure model &amp; influencer diversity reflects the customers we serve across all channels by FY22</li> <li>• Be body positive, reflecting and celebrating the diversity of body shape and making sure our inclusive sizes are shoppable across our channels by FY22</li> <li>• Empower our local teams to best represent our customers and offer an inclusive experience by FY23</li> <li>• Localise product assortments using data to improve our service and reduce wasteful operations by FY23</li> </ul> <p><b>Supporting Local</b></p> <ul style="list-style-type: none"> <li>• Localising charitable giving. Regionally elected charities supported by their local stores by FY22</li> <li>• Bringing the communities closer: offering inclusive local store and digital experiences by FY23</li> <li>• Work with local partners to support low carbon, safe and accessible physical shopping environments by FY24</li> <li>• Enable low carbon, safe and accessible digital shopping experiences by FY24</li> <li>• Recognise when a community we are part of is in crisis and react in an authentic, timely and appropriate manner</li> </ul>	<p><b>Our Customer Communities</b></p> <ul style="list-style-type: none"> <li>- Report activities directly related to our customer demographics</li> <li>- Report activity related to improving service of underrepresented and emerging groups</li> <li>- Report case studies of how we have used demographics to drive positive local impact</li> </ul> <p><b>Representing Our Customers</b></p> <ul style="list-style-type: none"> <li>- Report model and influencer demographics</li> <li>- Product sizes offered across all ranges</li> <li>- Indicate how we use our product assortment to serve communities</li> <li>- Report against metrics in development</li> </ul> <p><b>Supporting Local</b></p> <ul style="list-style-type: none"> <li>- Report the value and volunteer hours of regional and national charitable giving</li> <li>- Exceptional local crisis management support: Value and Man Hours</li> <li>- % of Portfolio: Landlord engaged in Climate Positive initiatives</li> <li>- Number of Business Improvement Districts we are engaged with</li> <li>- Report on % of store portfolio participating in initiatives to drive low carbon, safe and accessible physical shopping environments</li> <li>- Number of Safe and Accessible digital initiatives</li> <li>- Report on the value and volunteer hours on any exceptional local crisis management support required during the year</li> </ul>



Pillar 4 - Postive Local Impact <b>Targets</b>	Pillar 4 - Postive Local Impact <b>KPI's</b>
<p><b>Climate Positive: Thinking Local</b></p> <ul style="list-style-type: none"> <li>• Enable customers to live more sustainable lifestyles</li> <li>• Localising access to responsible product</li> <li>• Localising access to circularity. Promote and enable circular activities through our stores and digital: resale, upcycle, downcycle responsibly, with local solutions.</li> <li>• Identify and engage climate positive stores and digital service options, roadmap to 2040 (SBTi's) Energy, Water, and Waste</li> </ul>	<p><b>Climate Positive: Thinking Local</b></p> <ul style="list-style-type: none"> <li>- % of Store's meeting energy targets; % of Store's meeting waste targets</li> <li>- Backhauling plastics and cardboard weight</li> <li>- Hanger reuse data</li> <li>- Total weight of takeback and resale generated by channel</li> <li>- Number of innovative initiatives generated by our store and digital teams and the impacts they have had</li> </ul>

# How We Will Deliver

## Our Local Communities

Customer research and insight will engage appropriate resources to identify local detail on communities we are serving both in stores and on digital channels. Data gathered will create opportunities to be identified and leveraged which can be done at different levels: regionally, local stores or digitally. With these insights, we will explore opportunities in how we can better support these communities through different avenues.

## Representing Customers

We are very proud of our resourceful store teams and will empower them to develop their localness and relevance for their community. Our colleagues will continue to work within Retail Operational Frameworks to identify how best to serve the local communities identified.

Linking with our omnichannel transformation strategy, we will employ new digital enablers as well as the customer facing skills of their local store teams. We will grow our partnerships with influencers and storytellers to share our message on topics like sustainability, diversity & inclusion, body positivity and mental health.

Our own New Look teams are ambassadors for our sustainable product and inclusivity. Ensuring our retail and digital teams are well informed on the Kind to Our Core opportunities: to enable information to help customers make their choices, and ultimately encouraging them to choose New Look.

## Supporting Local

We have revised our charitable giving framework, our 24 store regions will now elect the local charity which they choose to support for the year, which will always align to our Kind values. We will support campaign led initiatives through our digital communities. Our regional and store managers will include time, resources, and charitable giving into their focus areas to facilitate delivering a local impact. In addition, we will support the Retail Trust through our stores, a charity that works to support everyone in retail when they need it most — in their own words, they create hope, health and happiness.

## Climate Positive: Thinking Local

We will not create waste in the communities we are part of. Last year we diverted 97% of our own waste from landfill. Our policies and processes of procurement, operations and facilities management will continue to drive down the volume of waste and repurpose and recycle all at end of useful life. We donate returned and damaged product to Newlife, a charity that also has an inclusive employment policy we admire.

Newlife sort the product they receive from stores and give us important feedback which we then use to continually improve our product development and durability. We promote take back with Hospice UK, supporting the cost of the administration of the scheme. We will be exploring resale opportunities with partners to further contribute toward our circularity ambitions to support the lifespan of products.





# Corporate Governance

New Look fulfills its reporting requirements through our Annual Report. In addition to the Principal Risks and Uncertainties section, our approach to Corporate Governance is outlined in our Directors report. The Directors have considered The Companies (Miscellaneous Reporting) Regulations 2018 and have applied the Wates Corporate Governance Principles for Large Private Companies. The policies by which we govern our business are outlined and available on our New Look group website.

Information about our Board members is set out in the Annual Report. The Board comprises of the non-executive Chairman, two executive directors (the Chief Executive Officer (“CEO”) and the Chief Financial Officer (“CFO”)), four non-executive directors, and two investor directors. The size of our Board and the expertise and constructive challenge of our non-executive directors is suitable for the size and scope of our operations and enables effective decision making. The Board meets at least eight times a year and the agenda is decided by the CEO and non-executive Chairman.

We understand the need to promote diversity at Board level that is in line with the protected characteristics within the Equality Act 2010. We have appointed two female directors, the Chief Customer Officer and Chief Commercial Officer, to attend board meetings as invited attendees (in a non-voting capacity). A key area of focus for us is helping more women progress into more senior roles at New Look. Currently 45% of our Operational Directors and 51% of our Heads of Department are female.

The Board has established an Audit Committee comprising of two non-executive directors (one of which is the Audit Chair), two investor directors and the CEO. The Committees have specific duties which have been delegated to them by the Board; details of these duties are set out in the terms of reference of each committee. We have also formed several operational level committees, such as a Treasury Committee, an Investment Committee, and a Governance & Compliance Steering Group. The terms of reference for these committees are approved by the Board.

We continue to refine our business strategy and are delivering a Transformation Plan to help us to improve performance and deliver sustainable, long-term change. A cross functional working group has been established to work collaboratively on a transformation plan, with the support of an external consultancy.

Effective risk management is fundamental to achieving our business objectives, protecting our reputation, and delivering added value to our stakeholders. The Board has overall responsibility for the risk management framework. The Governance and Compliance Steering Group meets monthly to monitor the Corporate Risk Register and review all emerging compliance and risk issues. During the year, the Audit Committee will meet three times. The Audit Committee reviews all audit and compliance outputs and monitors the effectiveness of the risk management arrangements. The Audit Committee provides an independent scrutiny and monitoring role to the Board. A risk based Internal Audit Plan is drafted on an annual basis and approved by the Audit Committee. The role of Internal Audit

provides the Board and the Audit Committee with valuable assurance in relation to the management of risk across the organisation. Principal risks & uncertainties are detailed in the Annual Report.

Good governance and effective communication are essential to deliver our purpose and to protect the Group’s brand and reputation. Our relationships with all stakeholders including shareholders, customers, employees, suppliers, and local communities are key.

## Sustainability Governance

We will strengthen our reporting through the Sustainability Accounting Standards Board (SASB) Apparel, Accessories and Footwear Sustainability Accounting Standard. (Appendix 1). New Look will answer the call from stakeholders for ESG reporting to offer comparable hard data.

An ESG Steering Group was formed ahead of the Sustainability Strategy refresh, and during our Materiality assessments. The group is comprised of C-Suite and Functional Directors across the business as well as the Heads of Sustainability, Operational Compliance and Legal – they all report to the New Look CEO. Meetings will take place quarterly, reviewing all Kind to Our Core activities and ESG related matters arising.

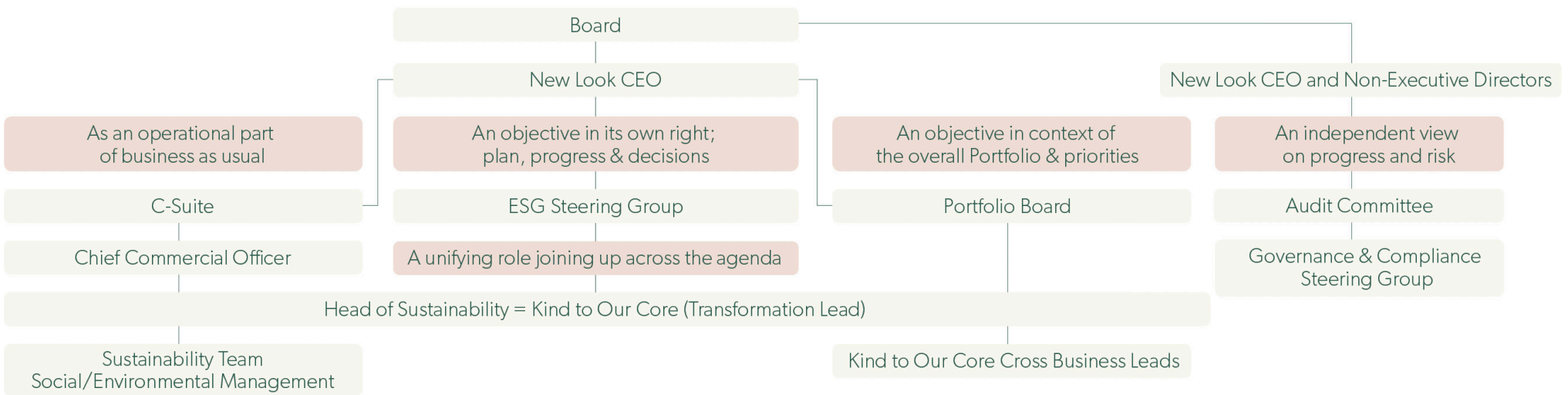
## Product Liability

New Look develop and place on the market, products which are safe and fit for purpose. Our Supplier Agreements outline the importance of product and service quality as well as our safety and product recall processes and policies. Our sourcing activities focus on continuous improvement and strengthening of our supplier performance through a supply base selected because they share our values and agree to work within our standards. Vendor onboarding checks are carried out, New Look operates a quality framework approach which requires best practice Quality Assurance protocols, Risk Assessments, and Quality Control activities.

Supplier Manuals are regularly updated which set out minimum performance requirements. Moreover, as noted above, there is oversight from established committees such as the Governance and Compliance Steering Group as well as our internal audit function, and key risks and regulatory developments are presented to the Audit Committee. Working groups have been established to monitor compliance and our International Standards Manager, together with our Legal team to ensure that new legislation is notified and is implemented in a timely manner. Our Buying teams have access to subject matter experts to support product development

and ensure Intellectual Property can be established and protected. Finally, we have a Data Protection Officer and GDPR is continuously monitored and reviewed.

## Corporate Governance





## Next Steps

This sustainability strategy refresh reflects a move forward in New Look's environmental, social and governance metrics and reporting – in line with a growing call from stakeholders for comparable hard data and a shift in customer and colleague expectations. New Look's sustainability activities to date have been considerable, which means foundations are in place, setting us up well for this transition in the remainder of FY22 and for the fresh targets we are now setting.

Sustainability and our Kind to Our Core principles run through our business transformation strategy, more specifically being given its own pillar in order that its related targets remain Board level priority. It is contributing to product relevance, supporting easy and inspiring experiences, operating as a brand that uplifts and unites as well as committing to being a force for good in fashion and our communities. In building a brand fit for change, Kind to Our Core will run through our cultural shifts as we continue to bring our values to life.

Progress will be shared alongside our annual report on an annual basis. Statutory reporting will remain part of our annual report and a separate sustainability progress report will be published. This will cover enhanced data reporting against our new targets, including our first full SASB report, the verification of our Higg Brand Retail Module and climate risk reporting aligned to the TCFD methodology.

We look forward to sharing our progress with you.

The New Look Sustainability Team



# Feel-good footwear

In 100% vegan materials  
approved by  
The Vegan Society



# NEW LOOK

# Definition of terms

<b>Accord</b>	The Accord is an independent agreement designed to make all garment factories in Bangladesh safe workplaces.
<b>ACT</b>	ACT is an agreement between 20 global brands and IndustriALL Global Union in pursuit of living wages for workers in textile and garment supply chains.
<b>BRC</b>	<a href="https://www.brc.org.uk/">https://www.brc.org.uk/</a>
<b>EBRD</b>	The European Bank for Reconstruction and Development (EBRD) is an international financial institution. The EBRD uses investment as a tool to build market economies.
<b>COP26</b>	The Conference of the Parties (COP) is an annual event that brings governments together to discuss and review how climate change is being managed domestically and internationally. This is the 26th year of the event.
<b>EBRD</b>	The European Bank for Reconstruction and Development (EBRD) is an international financial institution. The EBRD uses investment as a tool to build market economies.
<b>ED&amp;I</b>	Equity, Diversity and Inclusion - ensures fair treatment and opportunity for all. It aims to eradicate prejudice and discrimination on the basis of an individual or group of individual's protected characteristics
<b>ETI</b>	The Ethical Trading Initiative (ETI) is a leading alliance of companies, trade unions and non-governmental organisations that promotes respect for workers' rights around the globe.
<b>GHG</b>	A greenhouse gas is a gas that absorbs and emits radiant energy within the thermal infrared range, causing the warming of the planet. Examples of GHGs are carbon dioxide, methane and nitrous oxide.
<b>Higg FEM</b>	Higg FEM is a sustainability tool that allows factories to measure and assess their environmental impact, from water and energy use to waste and chemical management.
<b>Higg FSLM</b>	Higg FEM is a sustainability tool that allows factories to measure and assess their social impact, promoting safe and fair social and labor conditions for value chain workers all over the world.
<b>OECD</b>	The Organisation for Economic Co-operation and Development (OECD) is an international organisation that works to build better policies for better lives. Their goal is to shape policies that foster prosperity, equality, opportunity and well-being for all.
<b>Paris Agreement</b>	The Paris Agreement is an international treaty on climate change, adopted in 2015. It covers climate change mitigation, adaptation, and finance.
<b>SAC</b>	The Sustainable Apparel Coalition (SAC) is a global multi-stakeholder nonprofit alliance for the consumer goods industry.
<b>SASB</b>	SASB Standards guide the disclosure of financially material sustainability information by companies to their investors.
<b>SBTi</b>	The Science Based Targets Initiative (SBTi) defines and promotes best practice in science-based target setting.



# Definition of terms

<b>Scope 1</b>	Direct emissions from the activities of an organisation or under their control. Including fuel combustion on site such as gas boilers, fleet vehicles and air-conditioning leaks.
<b>Scope 2</b>	Indirect emissions from electricity purchased and used by the organisation. Emissions are created during the production of the energy and eventually used by the organisation.
<b>Scope 3</b>	All other indirect emissions from activities of the organisation, occurring from sources that they do not own or control. These are usually the greatest share of the carbon footprint, covering emissions associated with business travel, procurement, waste and water.
<b>SDGs</b>	The Sustainable Development Goals (SDGs) are 17 interlinked global goals designed to be a “blueprint to achieve a better and more sustainable future for all”. The SDGs were set up in 2015 by the United Nations General Assembly and are intended to be achieved by 2030.
<b>Sedex</b>	Sedex is a membership organisation that provides one of the world’s leading online platforms for companies to manage and improve working conditions in global supply chains.
<b>Textiles 2030</b>	<a href="https://wrap.org.uk/taking-action/textiles/initiatives/textiles-2030">https://wrap.org.uk/taking-action/textiles/initiatives/textiles-2030</a>
<b>UNGPs</b>	The United Nations Guiding Principles on Business and Human Rights (UNGPs) consists of 31 principles implementing the United Nations’ “Protect, Respect and Remedy” framework on the issue of human rights and transnational corporations and other business enterprises.

# SASB Table

Topic	Accounting Metric	Code	Further Details
Management of Chemicals in Products	Discussion of processes to maintain compliance with restricted substances regulations	CG-AA-250a.1	<p>New Look has a comprehensive Chemicals policy which covers both product and manufacturing restricted substances. The policy is managed by our international standards manager who actively researches and engages with authorities in this area, keeping it up to date with industry best practice, as well as regulatory requirements across all our markets. All requirements are communicated directly to suppliers. Compliance with testing and standards is managed through technical teams in each department.</p> <p>In addition to the chemical policy and standards, the Higg FEM module is also utilised to understand facilities chemical management. Next year we will introduce a minimum requirement for tier 2 facilities to have completed the Higg FEM module to monitor the chemical management compliance within our supply chain. As this programme develops we will be monitoring scores within the chemical section to ensure continuous improvement within our supply chain.</p>
	Discussion of processes to assess and manage risks and/or hazards associated with chemicals in products	CG-AA-250a.1	<p>New Look manages the chemical risks and hazards, by partnering with suppliers, acting on legislative changes early and setting a program of elimination.</p> <p>This is monitored using third party certification frameworks, component testing, and nominated sources.</p> <p>Failures are subject to corrective action plans, removed from the supply chain, and we work with affected suppliers on lessons learnt.</p> <p>As discussed above we are also engaging our suppliers in the Higg FEM module.</p>
Environmental Impacts in the Supply Chain	Percentage of (1) Tier 1 supplier facilities and (2) supplier facilities beyond Tier 1 in compliance with wastewater discharge permits and/or contractual agreement	CG-AA-430a.1	<p>The SASB Environmental metrics are very specific to compliance with the SAC and specifically the Higg FEM. New Look became members of the SAC in 2019 and we ask all of our suppliers to provide their environmental data for Tier 1 and Tier 2 facilities via Higg FEM.</p> <p>We explicitly state in our Supplier Manual that all suppliers are required to adhere to all applicable laws and regulations of the regions where they operate, included, but not limited to, the local environmental standards. This includes compliance with wastewater discharge permits - all facilities must ensure that wastewater leaving the site meets all applicable local and national laws.</p> <p>We have confirmed compliance of 60 of our Tier 1 and 2 facilities through their vFEM Higg module and will be increasing this as our roll out of Higg FEM grows.</p>
	Percentage of (1) Tier 1 supplier facilities and (2) supplier facilities beyond Tier 1 that have completed the Sustainable Apparel Coalition's Higg Facilities Environmental Module (Higg FEM) assessment or an equivalent environmental data assessment	CG-AA-430a.2	<p># 41% Tier 1 factories have completed Higg FEM</p> <p># 16% Tier 1 factories have verified their Higg FEM</p> <p># 38% of Tier 2 factories have completed Higg FEM</p> <p># 27% of Tier 2 factories have verified their Higg FEM</p> <p>New Look make the distinction between completed and verified Higg FEM in order to demonstrate reportable data available. New Look will reflect this with a move to mandatory verification for FY23 reporting.</p>

\* based on FY21/22 mid year figures



# SASB Table

Topic	Accounting Metric	Code	Further Details	
Labour Conditions in the Supply Chain	Percentage of (1) Tier 1 supplier facilities and (2) supplier facilities beyond Tier 1 that have been audited to a labour code of conduct, (3) percentage of total audits conducted by a third-party auditor	CG-AA-430b.1		Audited %
			Tier 1 Facilities	100%
			Beyond Tier 1 Facilities	<1%
			Total Audits Conducted by Third-party	100%
	Priority non-conformance rate and associated corrective action rate for suppliers' labour code of conduct audits	CG-AA-430b.2	This financial year we have so far had 8 cases of critical non-conformance within our supply chain, 38% of which have been remediated successfully. For the outstanding cases, discussions are on-going regarding remediation, with support being provided by The Reassurance Network to deliver a successful outcome.	
	Description of the greatest (1) labour and (2) environmental, health, and safety risks in the supply chain	CG-AA-430b.3	<b>Labour:</b> <ul style="list-style-type: none"> <li>- COVID-19</li> <li>- Modern Slavery, Forced Labour, Child Labour</li> <li>- Fair Wages, Minimum Wage, Working Hours</li> <li>- Freedom of Association and Collective Bargaining</li> </ul> <b>Environmental, Health and Safety:</b> <ul style="list-style-type: none"> <li>- Chemical safety</li> <li>- Climate change</li> <li>- Air pollution</li> <li>- Water consumption and pollution</li> <li>- Animal welfare</li> <li>- Reduce ecosystem biodiversity</li> </ul>	

# SASB Table

Topic	Accounting Metric	Code	Further Details	
Raw Materials Sourcing	Description of environmental and social risks associated with sourcing priority raw materials	CG-AA-440a.1	The main raw materials used in our products sourced in the highest volumes are cotton, man-made cellulosic fibres (such as viscose), polyester and PU. We recognise that these materials can have a significant environmental and social impacts, from sourcing and production through to customer use and disposal. Transitioning to more sustainable materials is fundamental to New Look’s sustainability strategy. New Look has been working on increasing the amount of more sustainable materials across their three most common materials cotton, polyester and viscose as well as introducing more recycled materials.	
			The production of conventional cotton uses large amounts of pesticides, chemicals and water. Furthermore, there are also social risks associated with cotton production, from food and water contamination to the use of forced labour. New Look has pledged to source 100% sustainable cotton by FY22. This is made up of recycled, organic and BCI cotton. Our organic cotton is certified to either Global Organic Textile Standard (GOTS) or Organic Content Standard (OCS). New Look issued a policy, committing to sourcing no production or raw materials linked to the exploitation and forced labour of Uyghur workers and we have been actively mapping the lower tiers of the value chain to ensure this commitment is upheld.	
			Viscose is a man-made cellulosic fibre, produced from wood pulp. Transforming the wood pulp into a fibre is an energy, water and chemically intensive manufacturing process. New Look have pledged to source 100% sustainable and traceable viscose by FY23 and have also signed the Changing Markets Roadmap to sustainable viscose. As part of the changing markets pledge, New Look is continually mapping their viscose supply chain, identifying poor viscose suppliers and working with direct suppliers to find better routes.	
			The production of synthetic fibres involves highly toxic chemicals and is energy intensive. New Look has pledged to source 50% recycled synthetics by FY24. Our more sustainable polyester is recycled. Our recycled polyester is certified to either Global Recycled Standard (GRS) or Recycled Claim Standard (RCS). New Look moved from PVC to polyurethane for footwear over the course of two years. New Look now have targets for the footwear and accessories team to transition to water based PU which has a lower environmental impact.	
			New Look has actively been mapping the lower tiers of the value chain, to gain more visibility of the mills that produce the polyester and viscose fabric that is used in the garments. This is to ensure that the fabric produced is coming from responsible sources and the workers are in a safe environment.	
	Percentage of raw materials third-party certified to an environmental and/or social sustainability standard by standard	CG-AA-440a.2	Material	%
			Cellulosics - Viscose	2.5
Cotton - Better Cotton Initiative			13.7	
Cotton - Organic Cotton			17.4	
Synthetics - Recycled Certified Polyester			3.5	
Activity Metric	Category			
Number of (1) Tier 1 suppliers and (2) suppliers beyond Tier 1	Quantitative		Tier 1: 472 Beyond Tier 1: 630	



# End Notes

- i <https://www.oecd.org/about/secretary-general/oecd-forum-on-responsible-supply-chains-in-garment-and-footwear-sector-france-february-2019.htm>
- ii <https://betterbuying.org/about-purchasing-practices/>
- iii <https://labourbehindthelabel.org/our-work/working-conditions/>
- iv <https://www.ilo.org/global/topics/forced-labour/lang--en/index.htm>
- v [https://drive.google.com/file/d/1TrctayepKX\\_oF7devRf77nmUy1xnZ33e/view](https://drive.google.com/file/d/1TrctayepKX_oF7devRf77nmUy1xnZ33e/view)
- vi <https://www.unwater.org/water-facts/scarcity/>
- vii [https://www.ilo.org/global/about-the-ilo/newsroom/news/WCMS\\_008075/lang--en/index.htm](https://www.ilo.org/global/about-the-ilo/newsroom/news/WCMS_008075/lang--en/index.htm)
- viii [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1002246/UK\\_stats\\_on\\_waste\\_statistical\\_notice\\_July2021\\_accessible\\_FINAL.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1002246/UK_stats_on_waste_statistical_notice_July2021_accessible_FINAL.pdf)
- ix [https://www.ilo.org/wcmsp5/groups/public/@ed\\_norm/@ipec/documents/publication/wcms\\_648801.pdf](https://www.ilo.org/wcmsp5/groups/public/@ed_norm/@ipec/documents/publication/wcms_648801.pdf)
- x <https://www.ethicaltrade.org/issues/gender-equity-global-supply-chains>
- xi [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/984685/transport-and-environment-statistics-2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/984685/transport-and-environment-statistics-2021.pdf)
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- xiii Fashion-on-climate-Full-report.pdf
- xiv [https://wrap.org.uk/sites/default/files/2020-10/WRAP-valuing-our-clothes-the-cost-of-uk-fashion\\_WRAP.pdf](https://wrap.org.uk/sites/default/files/2020-10/WRAP-valuing-our-clothes-the-cost-of-uk-fashion_WRAP.pdf)
- xv [https://www.mckinsey.com/insights/organization/~/\\_media/2497d4ae4b534ee89d929cc6e3aea485.ashx](https://www.mckinsey.com/insights/organization/~/_media/2497d4ae4b534ee89d929cc6e3aea485.ashx)
- xvi Fashion-on-climate-Full-report.pdf