

# NEW LOOK

## Code of Ethics

New Look’s Sustainability aims for Social, Environmental and Animal Welfare are set out below as a Base Code for suppliers, along with New Look Pledges, factory registration and auditing and New Look Kind requirements. Outlining the policies, requirements and processes to achieving these aims.

Suppliers who enter into business with New Look should show a clear commitment to achieving the sustainability aims. New Look suppliers must comply with national law and, where the provisions of law and this Base Code address the same subject, to apply that provision which affords the greater protection.

Acceptance of these principles is required prior to engaging with suppliers and it is the responsibility of the supplier to communicate these aims to all employees within their company and all entities engaged in the manufacturing and processing of New Look products, up to Tier 2 level at least. Please see below for ‘Tier system’ clarification.

Failure to make efforts to meet the sustainability aims may result in the ending of the business relationship and the cancellation of all outstanding and future New Look orders at our discretion.

If you have any queries regarding this document or an employee feels they are unable to resolve an issue through existing procedure, please contact New Look on [ethical.support@newlook.com](mailto:ethical.support@newlook.com).



### New Look ethical aims

#### 1. Employment is freely chosen

- 1.1. There is no forced, bonded or involuntary prison labour.
- 1.2. Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

#### 2. Freedom of association and the right to collective bargaining are respected

- 2.1. Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- 2.2. The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
- 2.3. Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace
- 2.4. Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.
- 2.5. Wages negotiated through collective bargaining must be implemented

#### 3. Working conditions are safe and hygienic

- 3.1. All sites manufacturing goods for New Look need to have fire and structural permits as per the country's legal requirement.
- 3.2. A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- 3.3. Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- 3.4. Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 3.5. Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- 3.6. The company observing the code shall assign responsibility for health and safety to a senior management representative.

#### 4. Child labour shall not be used

- 4.1. There shall be no new recruitment of children (below 15 years of age unless local law stipulates higher age in which case higher age shall apply)
- 4.2. Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child<sup>1</sup> found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child
- 4.3. Children and young persons<sup>2</sup> under 18 shall not be employed at night or in hazardous conditions.
- 4.4. These policies and procedures shall conform to the provisions of the relevant ILO standards.

#### 5. Living wages are paid

- 5.1. Wages and benefits paid for a standard working week must meet, at a minimum, national legal standards or wage set through collective bargaining agreement, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
- 5.2. All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

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<sup>1</sup> Any person less than 15 years of age unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age shall apply.

<sup>2</sup> Any worker over the age of a child as defined above and under the age of 18.

5.3. Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

## **6. Working hours are not excessive**

6.1. Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.

6.2. Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week. \*

6.3. All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay, however if overtime premium is required by local law at higher rate, the higher rate shall be followed for the purpose of overtime calculation.

6.4. The total hours worked in any seven-day period shall not exceed 60 hours, except where covered by clause 6.5 below.

6.5. Working hours may exceed 60 hours in any seven-day period only in exceptional circumstances where all of the following are met:

- this is allowed by national law;
- this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
- appropriate safeguards are taken to protect the workers' health and safety; and
- the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

6.6 Workers shall be provided with at least one day off in every seven-day period or, where allowed by national law, two days off in every 14-day period.

*\* International standards recommend the progressive reduction of normal hours of work, when appropriate, to 40 hours per week, without any reduction in workers' wages as hours are reduced.*

## **7. No discrimination is practised**

7.1. There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

## **8. Regular employment is provided**

8.1. To every extent possible work performed must be based on the recognised employment relationship established through national law and practice.

8.2. Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or homeworking arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

## **9. No harsh or inhumane treatment is allowed**

9.1. Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

## **10. Transparency**

10.1. The Supplier is required to inform New Look of the name and address of each factory / unit prior to New Look production being placed and send all the relevant documentation to register the factory for production. The Supplier must not commence production in a factory / unit until formal authorisation has been given by New Look, as this will be considered as 'unauthorised subcontracting'.

- 10.2. In line with our pledge to develop increasingly strong and transparent relationships with our suppliers, we expect all our suppliers to map and have complete visibility of their supply chain that produce and supply goods to us.
- 10.3. For each fabric mill currently working for the supplier, a Self-Assessment Questionnaire (SAQ) must be completed and sent to New Look Sustainability team.

## **Environment**

### **New Look Health, Safety and Environmental standards**

We want to do the right thing by the people we work with and the environments we operate in. To us, this means considering all aspects of our work, including improving the lives of the people we work with and minimising our environmental impacts.

The below adopted minimum standards are based on international industry standards, most of which are included in local law. They are designed to be reasonable and achievable and we expect all entities in the supply chain to meet them. Suppliers are encouraged to go beyond these standards and work towards best practices in the industry.

We expect all entities in the supply chain to:

- Meet our ethical trade requirements as highlighted in our base code
- Have a written plan for managing environmental impacts, with targets
- Measure and track their environmental impacts
- Create organisational responsibility for environmental management
- Take practical steps to reduce their environmental impacts
- Meet the minimum standards, and review the environmental management plan and targets annually

## Principles

1. New Look is committed to protecting the environment, conserving natural resources and conducting business in an environmentally responsible and efficient manner.
2. We expect all our suppliers and factories to share this commitment and believe that it's the responsibility of our suppliers and factories to manage their own environmental impacts.
3. We believe that it's our responsibility to support our suppliers and factories to manage their environmental impacts, and to meet our expectations.
4. While we expect suppliers to comply with local law, we also expect them to follow the spirit of the law, taking a proactive rather than a reactive approach to compliance. Doing so will help them to deliver real business benefit.
5. Where there are differences between our minimum standards and the law, whichever gives the greater environmental benefit should be followed.
6. New Look is committed to working collaboratively with different stakeholders to implement this policy.
7. Higg Index FEM is our preferred benchmark system and we expect all units (including fabric mills) to be registered within the platform and sharing the details with the New Look CSR Team by December 2021

**It is expected that wet processors involved in the production of New Look products meet the criteria below.**

## **1. Water consumption**

- 1.1. The factory must work within water abstraction permits
- 1.2. The factory should have working, water meters to measure the total water consumption of the factory
  - 1.2.1. These must be in place for New Look Kind
- 1.3. The factory should calculate the water consumption in wet processing per unit of production delivered to customers (l/kg)
  - 1.3.1. A water map should be drawn up to calculate water use that can be legitimately discounted from the calculation (e.g. domestic use, steam in garment making)

- 1.3.2. Process water, non-recycled cooling water, boiler water, laboratory water and sample department water must be included
- 1.4. There should be no over overflow rinsing of processes
- 1.5. All cooling water should be recycled
- 1.6. The factory should calculate the energy consumption in wet processing per unit of production delivered to customers
  - 1.6.1. An energy map should be drawn up to calculate energy use that can be legitimately discounted from the calculation (e.g. domestic use, vertical process such as knitting, spinning garment making)

### ***Water consumption - Good Practices***

- Measure a baseline and set targets to reduce water and energy consumption and start a programme to achieve the reduction.
- Achieve Level 3 in Water use Higg verified FEM
- Have a relevant certification in place that confirms that measurements and continuous improvement programmes are in place for water and energy, for instance Oeko Tex Step, ISO 14001, Bluesign, GOTS
- New Look intends to introduce maximum water and energy usage caps per unit of production in wet processing
- New efficient equipment
- Recycling initiatives

## **2. Chemical Management**

- 2.1. There should be an inventory of all chemicals used, handled, transported and stored onsite, including their quantities and where they have been bought from.
- 2.2. Safety Data Sheets (SDSs) should be available in the local language for all chemicals and formulations in the vicinity of the chemicals.
- 2.3. Chemicals should be stored and labelled according to the information on the MSDS including hazard information and PPE requirements.
- 2.4. Ensure control measures and PPE should be in place to prevent workers from being exposed to hazardous substances and to prevent them contaminating the environment.
- 2.5. Formulations should be part of certification schemes that guarantee compliance with the RSL (e.g. Bluesign or Oekotex Passport) or the factory should have written declarations of conformity from suppliers

### ***Chemical Management - Good practices***

- New Look supports the concept of chemical input management and declarations of compliance against e.g. the ZDHC MRSL or the use of certified compliant formulations is recommended.
- It is good practice to conduct chemical checks on incoming raw materials, chemicals and finished products.
- Achieve Level 3 in Chemical Use in Higg Index verified FEM
- It is good practice to continuously review the chemicals being used, reduce the use of hazardous substances and replace them with lower impact alternatives.
- Have relevant certification in place that confirms a good standard of chemical management - for instance ZDHC, Bluesign, Oeko Tex Step, ISO 14001

## **3. Wastewater**

- 3.1. All wastewater must be treated in a fully functioning effluent treatment plant (ETP) either on-site or in a shared or municipal ETP off-site before discharge.
- 3.2. Effluent discharges must meet the standards set out in permits and licenses required by local and national law. (for both volume and concentration).
- 3.3. Test results from an independent facility demonstrating compliance must be kept on file for at least 12 months.
- 3.4. If discharging to a central or municipal ETP, factories must have on file valid permits to do so, and test reports that show compliance with the central ETP's requirements.
- 3.5. For factories with an on-site ETP there should be a water meter on the exit. Readings of this meter should be correlated with the incoming water meter on frequent basis.

- 3.6. The following parameters should be checked on a monthly basis (or as required by the law, whichever is greater): Oxygen Demand (COD), Biological Oxygen Demand (BOD), pH, temperature, colour, Total Suspended Solids (TSS), and Total Dissolved Solids (TDS), and metals according to ZDHC MRSL List

### ***Wastewater - Good Practices***

- Check effluent discharges against the ZDHC wastewater guidelines for MRSL chemicals.
- Achieve Level 3 in Wastewater management in verified Higg FEM
- Have relevant certifications for instance Bluesign, OekoText Step, GOTS, ISO 14001 that confirm compliance has been demonstrated.
- Although generally mandated in certain regions, Zero liquid discharge is viewed positively provided energy use is not excessive.

### **4. Air emissions**

- 4.1. Obtain and operate within the permits and licenses required by local and national law and have test results on-site to demonstrate legal compliance.
- 4.2. Set targets to reduce emissions to air and start a programme to achieve the reduction.
- 4.3. Keep a list of all air emissions points within the factory and which substances are emitted at each point.
- 4.4. Install appropriate and appropriately positioned air extraction devices in areas of the factory where fumes or particulates (including dust) are generated and can be inhaled by workers.

### **5. Solid Waste**

- 5.1 Have systems in place to ensure the safe handling, movement, storage, recycling, reuse, or disposal of waste.
- 5.2 Consider reducing, re-using, and recycling for each waste stream.
- 5.3 Obtain and operate within the permits and waste receipts required by local and national law and keep them on file to demonstrate legal compliance.
- 5.4 Store and dispose of hazardous waste safely and legally using licensed waste contractors only.

### **6. Raw materials**

- 6.1 Cotton used to make our products shall be from BCI, CmiA, Organic or recycled. All suppliers must send to New Look the relevant certifications. Untraceable cotton will be banned from December 2020.
- 6.2 Viscose, Palm Oil and other wood-based fibres must be traceable down to the source and must not be sourced from ancient and endangered forests, endangered species habitat or through illegal logging.
- 6.3 The only nominated suppliers for viscose are Lenzing and Aditya Birla and New Look won't accept any other viscose from December 2022 onwards
- 6.4 Trace raw materials and keep appropriate records to show this. For man-made materials this should be back to the final production process location, for natural raw materials (such as cotton) this should be back to the country in which they were harvested.
- 6.5 Mica used in cosmetics must be traceable down to the source and not be sourced where there is a risk of child labour and unsafe working conditions

### ***Raw Materials – Good Practices***

- Use the Content Claim Standard of Textile Exchange to ensure the origin of certain raw materials, particularly MMCF and cotton, is considered a good Practice and New Look will have the right to ask for such documentation to ensure the fulfilment of its pledges.

## **7. Health and Safety – Minimum Expectations**

7.1. It is expected that workers are provided with a safe working environment along with personal protective equipment (PPE) with respect to:

**7.1.1.** Fire (including escape routes, exits, alarms, fire-fighting equipment, storage of flammable materials, machines, electrics, chemicals)

**7.1.2.** Structural (buildings – walls/roofs, floors, drops)

**7.1.3.** Machines (electrical and physical)

**7.1.4.** Chemicals

**7.1.5.** Air quality

**7.1.6.** Noise

**7.1.7.** Housekeeping and tidiness

### ***Health & Safety– Good Practices***

- Certifications such as OSHAS 18001 will be a good practice regarding worker safety and New Look strongly encourages its adoption by all suppliers

## New Look Animal Standards and Policies

### **Animal Welfare Policy**

We consider it unacceptable to harm animals in the process of manufacturing of our products.

Any animal materials in our products must come from animals treated according to the recommendations on animal welfare set out by the World Organisation for Animal Health (OIE)<sup>3</sup> in their Animal Health Codes and the Farm Animal Welfare Committee (FAWC) and their Five Freedoms<sup>4</sup>. These codes lay out requirements for keeping and treating animals that constitute, according to New Look, good animal husbandry.

No animal must be slaughtered solely to produce New Look goods. Animal derived products coming from slaughtered animals must be a by-product of the meat industry. Animal derived products must not come from endangered species as defined by Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)<sup>5</sup> and the International Union for Conservation of Nature (IUCN)<sup>6</sup> lists.

Our suppliers must obtain animal derived materials from farms with good animal husbandry and ensure our animal welfare standards are always safeguarded across the supply chain during rearing, transportation and slaughter. Suppliers should seek for industry recognised animal husbandry schemes and certifications when sourcing these products in order to achieve industry best practice. Suppliers must provide New Look with information about the origin of the animal derived materials to comply with our due diligence process.

Our suppliers must always adhere to this policy to promote and maintain animal welfare standards in the supply chain. By adhering to this policy, suppliers confirm that they meet New Look requirements and have communicated these to the relevant manufacturers, intermediaries and farms that handle our products to ensure understanding of and compliance with this policy and commit to follow due diligence practices stated by New Look to demonstrate compliance and promote best practice. The following information must be provided as a starting point for the relevant due diligence to be carried out:

- Name of the species used (common and scientific name)
- Country and region where the animals were reared

### **Endangered species**

New Look does not accept animal derived products from endangered species as defined by the CITES list and the IUCN red list of threatened species.

### **Fur**

New Look does not accept real animal fur. All the fur supplied to New Look must be artificial. This includes:

- Farmed fur (e.g. fox, mink, sable)
- Fur as a by-product of the food industry (e.g. rabbit)
- Mongolian lamb's fur, due to the practices involved in the traditional methods of slaughter
- Any leather or skin products that are product of unnatural abortions, including but not limited to karakul, astrakhan, broadtail, Persian lamb, swakara, krimmer or slink

For best practice please refer to [BRC Voluntary Guideline on Artificial/Faux Fur](#)<sup>7</sup>.

### **Animal hair**

- New Look only accepts hair from living animals such as cow, buffalo, yak, horse, goat, pig, and alpaca when this is sourced from farms with good animal husbandry as per our definition
- New Look does not accept hair from animals reared in cages
- New Look does not accept any products containing angora, due to the reported plucking methods used by some angora suppliers
- No vulnerable or endangered species must be used
- The retrieval of animal hair must not cause the death of the animal
- The retrieval of animal hair must not be obtained through live plucking or live boiling methods

<sup>3</sup> [http://www.oie.int/eng/en\\_index.htm](http://www.oie.int/eng/en_index.htm)

<sup>4</sup> <http://www.defra.gov.uk/fawc/about/five-freedoms>

<sup>5</sup> <http://www.cites.org>

<sup>6</sup> <http://www.iucnredlist.org>

<sup>7</sup> <https://brc.org.uk/media/273161/voluntary-guidelines-on-artificial-fox-fur.pdf>



### **Leather and skin**

- New Look only accepts animal leather and skin as a by-product of the meat industry, slaughtered in a humane way, coming from farms with good animal husbandry as per our definition - preferably with an accreditation from a recognised body
- New Look accepts products made of leather from cow, pig, buffalo, goat, sheep or fish (the latter must be sustainably caught/farmed). Other animals will have to be considered and assessed by New Look prior to sourcing the product

Animal leather and skin must not be obtained from:

- Live skinning or live boiling
- Endangered species
- Aborted animals, including but not limited to karakul, astrakhan, broadtail, Persian lamb, swakara, krimmer or slink
- Wild-caught or exotic animals, including but not limited to reptile skins, snake, alligator, crocodile and lizard

### **Wool**

- New Look accepts wool sourced from farms with good animal husbandry as per our definition. Sheep, lamb, cashmere and alpaca fall into conventionally used types of wool
- New Look does not accept mulesing practices in the supply chain
- Wool must not be harvested using live plucking or live boiling methods
- New Look does not use Merino wool sourced from Australia due to the widespread mulesing practices, unless it's declared as a Non-Mulesed or Ceased-Mulesed wool according to the National Wool Declaration
- New Look does not accept mohair in our product ranges due to widespread concerns on animal welfare practices in the South African mohair supply chain.

### **Feathers and Down**

- New Look accepts feathers, down feather and decoration feathers as a by-product of the meat industry, sourced from farms with good animal husbandry as per our definition
- Even as a by-product of the food industry, New Look does not accept feathers or down from farms which practice force feeding (i.e. production of foie gras)
- New Look does not accept feathers or down obtained from live boiling and/or live plucking methods
- Feathers and down from endangered, exotic or wild-caught animals must not be used
- All our down and feathers must be sterilised as per the EU standard EN 12935, preferably with an accreditation from a recognised body

### **Other Materials**

- Our suppliers must not use glue which derives from/contains animal products
- We do not accept bone, even if it's a by-product of the meat industry
- By-products from domesticated animals such as cats or dogs must not be used

### **Animal Testing**

- We will not conduct, commission, or be party to any animal testing of cosmetic products, ingredients or raw materials.
- We will not knowingly purchase ingredients, formulations or products from suppliers that have conducted, commissioned or been party to animal testing for cosmetics purposes on these products after the company's internal fixed cut-off date.
- Our suppliers must ensure their products comply with New Look animal testing standards and are required to engage in a due diligence process to demonstrate compliance and best practice. Suppliers are requested to inform New Look when their raw materials and finished products were last tested on animals.
- Occasionally we may use animal derived ingredients in our cosmetic products, but these must be collected without harm to animals.