

NEW LOOK

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

POLICY NUMBER	NL/POL/141
ISSUE DATE	8 th July 2022
VERSION NUMBER	4
TERRITORIES COVERED	Worldwide
APPLICABLE TO	All employees & Suppliers
POLICY OWNER	Sue Fairley

1. Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes a number of forms, including slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty in order to exploit them for personal or commercial gain.

New Look strongly condemns and prohibits any form of modern slavery within our supply chain and throughout our entire organisation. We are committed to:

- **acting ethically** and with integrity in all our business dealings and relationships;
- implementing **effective systems** and controls to ensure modern slavery is not taking place anywhere in our own business or in our supply chains; and
- ensuring there is **transparency** in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers, and other business partners. In our contracts with third parties, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude (whether adults or children) and we expect that our contractors will hold their own suppliers to the same high standards.

This policy applies to every person working for us or on our behalf, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, suppliers, agents, contractors, external consultants, third-party representatives, and business partners. As a condition of working with New Look, all such persons or organisations who have their own employees, suppliers and subcontractors that make up the wider part of our supply chain, are required to make sure our standards are understood and met in their operations too. We may amend this policy from time to time.

2. Responsibility for the Policy

New Look's directors have overall responsibility for ensuring New Look complies with its legal and ethical obligations and that everyone it applies to complies with this policy.

Department heads have primary and day-to-day responsibility for implementing this policy in their specific areas.

Suppliers have responsibility for upholding it in their business and onward supply chain.

Employees of New Look are all responsible for making themselves familiar with the policy so that they can uphold it in their particular role and identify potential breaches.

3. Commitment to the Policy

All suppliers, contractors and other business partners must show a clear commitment to maintaining the following standards, in particular the Specific Supplier Requirements in Section 7, and should ensure that factories producing any New Look products share this commitment.

4. Compliance with the Policy

As an employee, supplier, agent, or contractor of New Look you must ensure that you read, understand, and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our supply chains is the responsibility of all those working in our supply chain. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify us at ModernSlaveryOfficer@NewLook.com as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our supply chains of any supplier tier at the earliest possible stage.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of modern slavery, raise it in an email to ModernSlaveryOfficer@NewLook.com or individually with any current member of the Modern Slavery Working Group. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith under this policy.

5. Communication and Awareness of this Policy

You should be aware of our zero-tolerance approach to modern slavery and where appropriate must communicate the same throughout your business and to all of your suppliers that feed into our supply chain, both at the outset of the business relationship and on an ongoing basis as necessary.

6. Breaches of this Policy

Any employee who breaches this policy may face disciplinary actions which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

7. Specific Supplier Requirements

- 7.1 **Freedom of Employment:** All workers will have the right to enter into employment voluntarily and freely, without the threat of a financial penalty, physical or emotional violence or intimidation.
- 7.2 **Freedom of Movement:** Coercion will not be used to physically confine or imprison workers to the workplace or related premises, for example employer-operated residences. Mandatory residence in employer-operated residences must not be made a condition of employment. Practices such as confiscating or withholding worker identity documents or other valuable items (e.g., work permits, travel documentation and debit and credit cards) are prohibited.
- 7.3 **Conditions relating to Skills, Development & Vocational Training:** Employers that provide such training opportunities shall not unreasonably impose work or service as a means of recovering the costs associated with them.

7.4 Employment Agencies: Suppliers that engage private employment agencies must take measures to:

- Ensure that such agencies do not engage in fraudulent practices that place workers at risk of forced labour and trafficking for labour exploitation;
- Prevent the abuse of workers contracted by such agencies, for example by ensuring that such workers receive adequate protection in relation to wage-related matters, working hours, overtime and other working conditions;
- Ensure that no fee or cost for recruitment shall be charged to a worker employed by our direct product suppliers, or by a factory manufacturing product for our direct suppliers. Recruitment fees for workers in other parts of our supply chains must either not be charged to the worker or must be legal, reasonable and must not result in debt bondage;
- Use only those recruitment agencies that are licensed or certified by the competent authority

8. Remediation

We have a remediation plan to be followed in the event that forced labour, modern slavery or human trafficking activities should be found or alleged in our business or supply chain. Since the symptoms and root causes of forced labour are varied, the investigation and corrective actions would be tailored to the circumstances surrounding the case. As a minimum, New Look is committed to performing the following actions in all reported cases. The process will be overseen by the Modern Slavery Working Group or an individual member of the Modern Slavery Working Group in conjunction with the appropriate Director. The key stages are:

Review and Investigate the Allegation(s):

- Upon receiving information or allegations of forced labour, modern slavery or human trafficking, the Modern Slavery Committee, along with New Look's Legal, Sustainability and Sourcing teams, will carefully and immediately activate our investigation and remediation protocol, in co-operation with local advisors and the source of the allegations where appropriate.

Corrective Action plan:

- Once a full investigation has been conducted and the modern slavery concern properly confirmed and understood, New Look will approach management of the business involved and begin the corrective action process in co-operation with the affected facility or supplier. We will also make sure the findings of our investigation are reported or notified in accordance with the relevant laws.
- As far as possible, New Look will co-operate with the relevant authorities to ensure victims have the appropriate care and support.
- Once the root cause analysis process has been satisfied, New Look will work with the factory, business, supplier, or agent to develop sustainable corrective action plans and timelines for execution and will oversee and monitor implementation of those plans.

Escalation where appropriate:

- New Look has established an escalation policy which will be used in the event that a factory, suppliers, agents, contractors, external consultants, third-party representatives or business partners refuse to cooperate, make little or no progress in remediation and/or demonstrate a lack of commitment to the process. This may result in New Look ending the commercial relationship with that entity.