

MODERN SLAVERY STATEMENT

At New Look, we believe in protecting and enhancing the lives of our people across our business and our global value chains. We recognise that no economy or industry is immune to the issues of modern slavery and human trafficking. Therefore, we continue to do all that we can to ensure that they do not exist in any part of our business or value chain.

This report documents the progress made to the end of the financial year 2021/22, which is published in line with our annual report.

Although this report relates to actions we have taken in the last financial year, we also highlight new focus areas for New Look. These have arisen due to the ongoing COVID-19 pandemic, updated materiality risk assessments, and the need to raise awareness of associated potential risks and vulnerabilities. We remain committed to developing our policies, practices, and ways of working to deal with any evolving risks we face as a business.

WHO ARE WE?

New Look is a leading omnichannel broad-appeal fashion brand, dedicated to creating a feel-good shopping experience. First founded in 1969, New Look now operates in 53 countries with 435 stores worldwide. Within the New Look group, New Look Retail Holdings Limited is the group holding company where the main board of directors for the group is appointed. New Look Retailers Limited is the main employer and trading entity within the group.

The business in numbers



£839.6M

FY22 REVENUE



9848

EMPLOYEES

Total number of colleagues across our own operations directly employed



4129

PEOPLE

Total number of agency workers employed in our DC & Support Centres.



435

STORES WORLDWIDE

435 stores across the UK and ROI, as of 26th March 2022



53

COUNTRIES

We deliver to 53 countries through newlook.com



82%

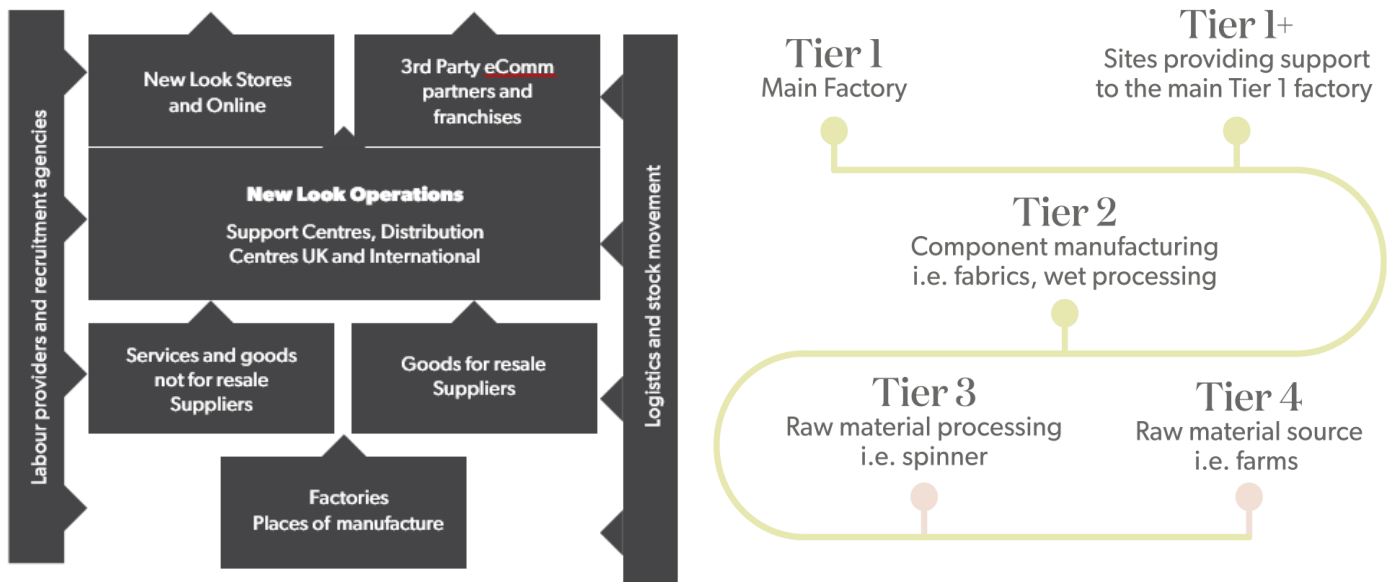
PRODUCTS

82% of products are supplied by our top 10 suppliers

OUR VALUE CHAIN MODEL

We have mapped our value chain to better understand the areas at risk and update information on a biannual basis. All sites across our Tier 1, as well as those Beyond Tier 1, are published on our corporate website, as well as the Open Apparel Registry. Ongoing mapping and monitoring are paramount to identifying risks, as part of an extensive due diligence process. Slavery, forced labour, servitude, bonded labour and human trafficking are issues of global concern that could potentially affect all areas of our business and those working across our value chains.

We expect and insist that our suppliers support and protect their workers. Equally, in line with our responsibility as a company under the UN Guiding Principles of Business and Human Rights, we have a duty to promote and protect the welfare of all workers across our value chain. To drive this agenda forward, we focus on sharing knowledge and building capacity with our suppliers, so that our requirements and expectations are understood and actioned.



OUR BUSINESS

Own Operations

At the end of financial year 2021/22 we had employed 9848 people. In that time, to accommodate peak needs within our UK distribution centre, we employed a total of 3880 agency colleagues throughout the course of the year, as well as a further 249 in our Support Centres.

- 435 stores in the UK and Republic of Ireland were in operation.
- We had support centres located in London and Weymouth.
- We operated one distribution centre in Staffordshire, which distributed all stock to our stores, franchise and wholesale partners and fulfilled global E-commerce orders.
- From August 2021, we introduced New Look concessions in 18 Asda stores.

From April 2022, our current freight partner, EV Cargo, will be providing support with routing stock to several of our wholesale partners via their centres in Germany. All appropriate due diligence will be undertaken as part of this process. This will ensure adherence to internal modern slavery requirements and the upcoming German Supply Chain Due Diligence Act, with a high priority being assessment of risk for any vulnerable worker groups, such as temporary, migrant or agency labour.

Goods for Resale (GFR)

This is the supply of products that are sold in our stores and online, including products made by third-party brands.

Many people are involved in supplying our products before they reach our distribution centres. As of 31 March 2022, we have a global value chain of 125 suppliers and a network of over 494 factories across 21 countries, involving approximately 200,000 workers.

Services and Goods Not for Resale (GNFR)

These are services and goods that we buy because they are needed for our business to operate and are not sold to our customers. These services and goods include warehouse management, garment processing, outsourced customer deliveries, logistics, IT, utilities, cleaning and customer care. We procure these services and goods from more than 1100 suppliers using a category management methodology.

Global Partnerships, Wholesale, Franchise and Marketplace

We continue to expand our global business partners, with key wholesale partners including ASOS and Very within the UK and ROI. Our franchise partner in Malta operates three stores, and a local website, whereby they employ their own staff to run the business on behalf of New Look.

POLICIES AND GOVERNANCE

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

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

this and other supporting policies such as Whistleblowing, Code of Ethics and Equal Opportunities and Dignity at Work in their businesses.

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

As part of our supplier manual and trading and compliance standards, suppliers also commit to the below policies. They are required to distribute these policies to the lower tiers of their value chain.

- Refugee Policy
- Child Labour Policy
- Cotton Sourcing Policy
- Homeworker Policy
- Migrant and Contract Worker Policy
- Anti-Slavery and Human Trafficking Policy
- Anti-Bribery Policy
- Whistleblowing Policy

During the annual review of our policies and processes, we have made updates to include clearer definitions as well as situational action plans for our suppliers. As part of our work on improving purchasing practices, we have also developed a new responsible entry and exit policy. This policy aims to support those making considered decisions around entering new factories and to ensure we decrease the impact on the factories and their workforce when we exit a factory.

RISK PRIORITISATION

Our overall group risk management process is constantly evolving. During this last financial year, across our GFR value chains, specifically within our key sourcing countries, we conducted a materiality review and risk assessment, highlighting our salient risks, our ability to influence and strategic priorities. More details can be found in our 2022 Sustainability Strategy Refresh.

Our methodology is based on a combination of New Look specific requirements and other available risk matrices, including SEDEX, the ITUC Global Rights Index, the OECD, ILO standards. We also gather detailed information through our suppliers' factories profiles to make more informed decisions. We gather and analyse third party audit data from annual social audits, identifying patterns and common issues to inform our next steps and the support needed to mitigate risks. Every Tier 1 factory is expected to meet our annual audit requirements and we grade these audits depending on the issues found. We work closely with our suppliers and factories on remediation to ensure that the factories are improving, and worker welfare is protected and monitored.

We recognise that modern slavery may affect our people and those within our respective value chains. We have identified the below groups as those more vulnerable to risks of modern slavery and wider exploitation. Most risk lies in outsourced employment because we have less control and visibility of these workers and the practices of their employers.

- Migrants
- Women
- Young people and children
- Refugees and minority groups
- Displaced people and communities
- Temporary, contract or agency workers
- Homeworkers
- Seafarers and workers in the logistics and freight supply chains

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

We have documented our control environment in our corporate risk register as part of New Look's Risk Management process. This allows us to monitor the effectiveness of our controls and the risk of a major breach of our ESG commitments or obligations. We produce a Group Compliance Report that is presented to our Governance and Compliance Steering Group and the Board via the Audit Committee.

DUE DILIGENCE

COVID-19

The COVID-19 pandemic continues to have a global impact, including on the apparel industry and global value chains. Throughout the pandemic, we have continued to work closely with our suppliers and across our own operations to ensure that necessary support is provided.

During FY21/22, we continued to prioritise the wellbeing of our workers in our suppliers' factories, facilitating safe working environments and ensuring all wages continued to be paid, as per local law. In 2020, we created and rolled out a checklist, which has now become a standard part of our factory registration process to continue facilitating worker safety.

With the support of our on the ground partnership with TRN, we continue to assess H&S standards including PPE, policies and procedures, worker transport, accommodation, and payment of wages, as part of the virtual and on-site visits.

Our operations

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

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

New Look works with three recruitment agencies in our UK distribution centre, which are regularly audited. Monthly management reports are provided to our Director of Logistics (detailing the recruitment activity and nationality of our temporary workers). These agencies are members of the Stronger Together initiative and provide comprehensive support and information to workers during the induction process.

In addition, in April 2021 we published an update to our whistleblowing policy. We partnered with Navex to introduce a new, confidential reporting portal and hotline for all our colleagues. The service can be always accessed, either online or by telephone and can be used to report any concerns of wrongdoing within our business, or by our suppliers, or associates.

GFR

We monitor our Tier 1 sites through independent, third-party audits and specialised programmes. In addition, our in-house sustainability team and partner organisation, The Reassurance Network, conduct site visits (both physically and virtually) to promote transparency. Since 2019, we have extended our monitoring programme to further Tiers.

We use risk ratings for all Tier 1 factories to inform prioritisation and remediation. We support sites to identify critical issues, recognise modern slavery risks and help build capacity to address these issues and risks. 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 and we work with sector partners to facilitate risk assessments and implement mandatory training across the business.

Whilst we are mindful of the limitations of audits, we recognise their importance for risk assessments when combined with partner reports, industry benchmarks and market studies. These help us to better understand the risks present in our value chain. Our risk assessment process also takes into consideration the different worker demographics across countries, value chain tier and product types, to identify vulnerable groups and inform a targeted approach in addressing their specific risks. As a signatory to the Transparency Pledge, we publish our Tier 1 and Beyond Tier 1 factory lists on a biannual basis in April and October.

Going forward, we will be drawing on recognised frameworks to support our focus on risk to people. We will review existing audit requirements to facilitate optimum data collection and collaborate further along the value chain to address greater modern slavery risk areas, such as freight and transport. More detailed information can be found in our [Sustainability Strategy Refresh](#), launched in January 2022.

GNFR

Our supplier onboarding processes include an initial basic screening with a deeper due diligence for suppliers. Where a risk might be present an objective risk scoring methodology is utilised. We continue to revisit our existing GNFR supply base by working through our high-risk commodities. This includes cleaning services, road transportation, and other categories with high labour services. We remain focused on ensuring we have modern slavery clauses within our key contracts.

All suppliers are required to complete a modern slavery questionnaire before services are contracted. Their score is on a spectrum, from those who demonstrate clear understanding and processes to those scored high risk for things such as worker engagement or lack of processes in place. Those deemed high risk will be required to complete our e-Learning module to support greater understanding of risks, of which we anticipate significant benefits. Whilst this has been met positively by most, we do continue to experience a lack of understanding of the exposure to modern slavery and human trafficking.

We utilise our membership of the Indirect Procurement Human Rights Forum and consult with other experts to improve the channels of communications further in respect of modern slavery across the GNFR suppliers.

Our franchise, wholesale, and marketplace partners

Building on the work started in 2017 with our partners, we have developed a Franchise Environmental Social Governance (ESG) Self-Assessment Questionnaire to carry out relevant due diligence on new franchise partners that we are looking to onboard. This will identify areas of risk where they may need additional support.

Internal audit and assurance

Environmental, Social, Governance (ESG) Standards is a risk area on our Corporate Risk Register and a principal risk in our Annual Report. This helps to ensure that the associated ESG risks are regularly reviewed by senior management and then used to inform our annual internal audit plan and assurance work. The audit and risk team provide ongoing input to the Modern Slavery Working Group.

The audit and risk team has adopted an 'agile' approach to planning including a specific modern slavery internal audit in reaction to any increase in risk or incidents that may occur. Outside of a specific audit, the risk of modern slavery would be considered as part of the scope of other audits, including but not limited to, recruitment, the use of temporary workers, distribution centre audits, sourcing, ESG and organisational ethics (e.g., whistleblowing).

Access to remedy

Workers need to have trust and confidence to raise concerns as and when they arise. Ideally, these are through traditional workplace channels, but when these fail, other independent avenues need to be provided. We have facilitated access to whistleblowing helplines in three strategic sourcing countries: Bangladesh, through Accord, the UK as part of the Fast Forward programme and in Turkey, through our strategic supplier's own whistleblowing line.

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

In the UK, all factories we source from must be Fast Forward audited, which includes making resources available to workers to contact if needed. We are also supporting a community outreach programme in Leicester. This provides two outreach workers to directly support workers, as well as advocating more widely for the provision of greater protections and services for workers in the garment sector. We are also part of the Workplace Support Agreement, a programme which works collaboratively with trade unions and factories to enhance worker-management relations.

In the last financial year, despite having logged social compliance issues, none have resulted in any indicators of modern slavery or human trafficking. We have designated communication channels for our own employees and suppliers to raise modern slavery concerns. As part of the staff induction, employees are made aware of the Stronger Together initiative should they wish to raise any concerns. In addition, as part of our Anti-Slavery and Human Trafficking Policy, a Modern Slavery Officer for the business has been appointed.

In the event of any forced labour, modern slavery or human trafficking activities being found in New Look, we have a remediation plan in place. Since the root causes of forced labour are varied, the investigation and corrective actions need to be tailored to the circumstances that surround any potential case.

PARTNERSHIPS

We are committed to tackling human rights issues directly and have a dedicated team who promote and drive sustainability across the whole business. The sustainability team work closely with our buyers and GFR suppliers to monitor purchasing practices and help teams understand the impact on people in our value chain.

The key collaborations and initiatives we are part of, which help to support the commitments outlined in this statement are:

Partner	Who	Purpose	Working together
Apparel and General Merchandise Public Private Protocol (AGM PPP)	The AGM PPP is a multi-stakeholder initiative which aims to prevent the exploitation of vulnerable workers in the UK's garment industry.	Modern slavery & human trafficking	We are engaged in two working groups through the work of the AGM PPP; one focuses on worker voice and the other on business accountability.
Better Cotton Initiative (BCI)	The BCI makes global cotton production better for the people who produce it, better for the environment it grows in, and better for our sector's future.	Modern slavery & human trafficking in lower tiers	Better Cotton is produced by farmers who implement seven principles, including Decent Work.
British Retail Consortium (BRC)	BRC is the trade association in the UK, which we are members of.	Modern slavery & human trafficking	In 2019, we joined the BRC's Better Retail Better World initiative.
Call to Action - End Uyghur Forced Labour	Coalition of civil society organisations and trade unions united to end state-sponsored forced labour and other egregious human rights abuses against people from the Uyghur Region in China.	Modern slavery & human trafficking	As an endorsee, we have agreed to map our value chain to ensure we are not knowingly supporting the abuse of Uyghur workers directly or indirectly.
Fast Forward	Fast Forward is a next-generation supply chain labour standards improvement programme that works for all suppliers and service providers, in all sectors, at all stages of their social compliance journey.	Modern Slavery & Human Trafficking in UK supply chains	We implement this programme in our UK supply chain and are currently auditing all facilities down to Tier 2, which includes manufacturing sites, reprocessing facilities and landed warehouses.
Indirect Procurement Human Rights forum (IPHR)	Cross industry collaboration to protect and respect human rights in GNFR supply chains.	Modern slavery in GNFR supply chains	We engaged with the IPHR Forum at the end of FY20 to focus on various areas of our GNFR supply chain.
International Transport Workers' Federation (ITF)	The International Transport Workers' Federation (ITF) is a democratic, affiliate-led federation recognised as the world's leading transport authority, promoting respect for trade union and human rights.	Modern slavery in logistics supply chains	In March 2021, we agreed a partnership with ITF for their support on mapping shipping vessels used by our logistics providers, and to verify working conditions for seafarers linked to these vessels.
Sedex	The Sedex platform has a variety of tools and services that support human rights due diligence in value chains.	Risk Management & detection of forced labour indicators	Through our Sedex membership, we utilise the risk analysis tools to understand the risks in our sourcing countries and to help us make informed decisions.
The Reassurance Network (TRN)	TRN is a close-knit team of specialists located in major sourcing regions helping manufacturers, suppliers, and agents to understand and improve working conditions and factory performance.	Modern slavery	We have partnered with TRN since 2019, to support us in our key sourcing countries with factory risk assessments, supplier, and factory capacity building, as well as providing on the ground expertise.

PROGRESS TO DATE

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

	Potential Risk	Aim	Progress in FY21/22	Next Steps
Own Operations	Labour providers we use not adhering to the high standards set out in our policy. Failure results in a heightened risk of forced labour situations.	To protect agency workers in our own operations.	<ul style="list-style-type: none"> To provide greater flexibility in our Distribution Centre, the main area in our business where we rely on temporary agency labour, particularly at peak times. We have introduced two additional agencies, KPI Recruitment and Job and Talent Works, who operate alongside our existing agency GI Group. Neither agency uses overseas partners and only recruits foreign workers already resident in the UK, which reduces risks associated with travel for work. They operate robust checks for modern slavery indicators and our time and attendance systems also safeguard against worker substitution. Each agency has committed to being a: Stronger Together Business Partner, an active member of The Association of Labour Providers. The Recruitment and Employment Confederation and the GLAA Labour Provider/User Group provide us with a consistent flow of information and support tools. Any subcontracted agency used by our providers need to either already be a member of Stronger Together or be in process of application, along with completing all other relevant checks. These are led by the agency and monitored by New Look. Agency colleagues are trained on Modern Slavery indicators and Stronger Together, including what to do if colleagues have any concerns around modern day slavery. Posters are placed in the offices and canteen and notice boards showing GLAA contact numbers. 	<ul style="list-style-type: none"> Following the introduction of the additional agencies, our focus this year will be ensuring the first self-assessments for these new agencies are completed and reviewed. We will continue to hold regular review meetings with each partner to ensure our ongoing commitment to preventing modern slavery is achieved.

	Potential Risk	Aim	Progress in FY21/22	Next Steps
	Employees in own operations not aware of modern slavery indicators.	To raise awareness internally across the business of modern slavery and increase vigilance.	<ul style="list-style-type: none"> The sustainability team, in conjunction with the Talent & Development (TD) team, are in the process of updating the modern slavery mandatory eLearning module. The format of this eLearning will change into a 'Test Me Teach Me' format, meaning colleagues will need to 'pass' the test to ensure clear understanding, or retake the module. The Sustainability Strategy and its pillars are referenced in the Corporate and DC Induction increasing awareness of Modern Slavery throughout the business. The induction training has been strengthened, including more details on value chain, sourcing countries, risk areas and modern slavery generally. For our new starters, this training is mandatory and must be completed within their first two weeks of their start date. After this the training becomes an annual, mandatory module for all. The content is reviewed annually, and compliance is monitored centrally. 	<ul style="list-style-type: none"> New Look's compliance targets for mandatory completion are 95% which considers LTS & Mat leavers. It currently stands at 90% and steps are being taken to achieve target. A 'Welcome to New Look' working party to be set up for SMEs to take ownership of induction material on Welcome Zone to ensure up to date. A governance group of SMEs who own the mandatory compliance modules to be set up to ensure SMEs review and update eLearning content quarterly.
Goods for Resale	Suppliers must ensure their labour providers meet our standards. Failure could result in a risk of forced or bonded labour situations.	Reduce risks faced during recruitment and provision of agency workers in our value chain.	<ul style="list-style-type: none"> In FY21 we signed the Call to Action by The Coalition to End Forced Labour in the Uyghur Region to confirm our commitment that we will not knowingly source any raw material or services for the manufacturing of any of our product which exploits people from the Uyghur Region in China. During the last financial year, we have mapped three facilities that were linked directly or indirectly to the labour use of Uyghur workers. We worked with our suppliers and have either terminated the relationship, or in most cases, worked with our suppliers to redirect the sourcing route. 	<ul style="list-style-type: none"> Continue collaboration with the Call to Action to strengthen our approach. This will be supported by our ongoing targets to increase transparency. Continue mapping labour providers when onboarding new manufacturing facilities. Assessment of the labour providers to ensure they meet our standards. Review requirements for labour providers in the value chain.

	Potential Risk	Aim	Progress in FY21/22	Next Steps
Goods for Resale	<p>Potential for heightened risks of modern slavery going undetected if the value chain is not transparent.</p> <p>Risk of unauthorised subcontracting.</p>	Continually increase the transparency of our product value chain.	<ul style="list-style-type: none"> • We biannually publish our Tier 1 and Beyond Tier 1 list on our group website. • We are continuing to work towards our sustainability agenda with ambitious targets to limit the impact at every step of our value chain. We aim to increase transparency further as outlined in our Sustainability Strategy Refresh. • In the UK, we have assessed Tier 1 and Tier 2 against the Fast Forward programme. Our plans to roll out the Fast Forward programme to the landed warehouses and reprocessing facilities continues after delays caused by various lockdowns. • Through Fast Forward membership, our suppliers and factories in the UK can attend training sessions on the audit programme. Any new suppliers and factories that we work with in the UK are asked to take part in the training, to help them understand the audit methodology to ensure best practice. • We have an unauthorised subcontracting policy which requires all Tier 1 factories manufacturing our product to be registered prior to production being placed. • We have created a formal process for all third-party brand and concession partners, to promote greater transparency and improved business practices. As part of this process, they are required to complete a self-assessment questionnaire and provide details of their Tier 1 factories. This will help us to identify any potential risk areas in our wider operations. 	<ul style="list-style-type: none"> • Publish full visibility of all suppliers through to Tier 2 by FY23. • Publish full visibility of our cotton, viscose and polyester supply chains to Tier 3 by FY23 (equates to 75% of our raw materials). • Continue working with our third-party brand and concession partners to promote transparency of their supply chains and continuous improvement of standards. • Continue working towards increased auditing of reprocessing sites.
	<p>Suppliers' use of migrant workers recruited through agencies can put workers at risk of exploitation.</p> <p><i>Migrant workers are more susceptible to debt bondage. Refugee workers are more susceptible to forced labour.</i></p>	Mapping the use of migrant and refugee workers in our value chain. To support the no discrimination and fair treatment of refugee workers when found in our supply chain.	<ul style="list-style-type: none"> • We have a Migrant Labour and Contract Worker policy and Refugee policy which is included in the supplier manual and can be found on our website. • During FY21/22 we have reviewed and updated these policies to include situational action plans, providing suppliers with greater support and insight into how these issues can be remediated should they arise in the value chain. • We created the migrant worker due diligence checklist as part of our risk assessment process when entering a new sourcing country. This was utilised as part of our due diligence when onboarding a factory in Mauritius, a country that heavily relies on migrant labour. • We are closely monitoring the evolving situation in Ukraine, collaborating with the ETI and other stakeholders to understand the impact across our business operations. Whilst we currently have no factories located in Ukraine or Russia, we are aware of the potential impact that this will have on our value chain due to the displaced communities entering neighbouring countries, as well as labour shortages and the reliance of migrant labour in logistics supply chains. 	<ul style="list-style-type: none"> • Rollout of the migrant worker checklist to areas of the value chain that rely heavily on migrant labour. • Continue collaboration with our suppliers, the ETI, ITF and other stakeholders on how to support displaced communities from Ukraine.

	Potential Risk	Aim	Progress in FY21/22	Next Steps
			<ul style="list-style-type: none"> Syrian refugees account for 6% of our Turkish value chain. By working closely with our suppliers and factories, we have ensured that the Syrian workers were able to obtain the approved work permit, following a successful application. Refugee information will be updated regularly to ensure support can be provided with the annual renewal of work permits. Our main supplier in Turkey has begun a collaboration with The Refugee Support Association (MUDEM). MUDEM provides refugees with social and legal support, as well as access to rights and services should they need it. MUDEM's posters will be available in all factories in their value chain providing a communication channel for refugee workers. 	<ul style="list-style-type: none"> Continue mapping refugee populations in other key sourcing countries.
Goods for Resale	Suppliers' failure to put HR and recruitment processes in place can lead to children being employed illegally.	Ongoing implementation of our child labour policy and remediation plan.	<ul style="list-style-type: none"> In FY21 we updated our child labour and remediation policy, to provide suppliers with more detail on actionable steps to prevent child labour occurring, as well as steps to be taken should child labour be found in their value chain. We have checks in place to identify young workers and support suppliers and young workers in cases where they are found. We have not found any cases of child labour in FY21/22. We continue to monitor the presence of young workers through our factory visits and 3rd party audits. We consider young workers to be more vulnerable and this is a key focus area on our assessments. 	<ul style="list-style-type: none"> We will be reviewing our risk assessment framework to be more in-depth across tiers and countries, which will include identifying more vulnerable groups for exploitation.
	Women workers are particularly vulnerable to exploitation.	Identify concentrations of women in our value chain who may be in a vulnerable position.	<ul style="list-style-type: none"> We have been engaging with Sedex on their gender data indicators for guidance on data points that we can begin gathering. This allows us to better understand the gender differences within our value chain, as well as identifying the risk areas. Working with our IT company to allow us to integrate gender data more seamlessly into our internal reporting capabilities, allowing us to make more gender informed decisions when implementing beyond audit programmes. 	<ul style="list-style-type: none"> Investigate programmes that support with the target of increasing access to leadership positions. Work towards understanding the concentrations of women workers in beyond Tier 1 value chain. Continue working to upgrade our internal reporting systems to allow for gender data to be gathered more efficiently.

	Potential Risk	Aim	Progress in FY21/22	Next Steps
Services and GNFR	Heightened risk of isolated working conditions in the supply chain.	To ensure that those working within our freight and logistics supply chain are treated fairly and are in safe working environments.	<ul style="list-style-type: none"> We are in the initial stages of collaborating with the International Transport Workers' Federation (ITF), with the aim of mapping the vessels used by our logistics providers to verify if they comply with ITF standards of working conditions and treatments of seafarers. Early measurement demonstrated that approximately 90% of vessels used are covered by ITF-approved collective bargaining agreement (CBA) or ITF-acceptable collective bargaining agreements (CBAs). Agreements ensure that seafarers have access to the protections and recourse offered by a negotiated agreement between the owners/operators of the vessels on which they work and a trade union that is affiliated to the ITF. 	<ul style="list-style-type: none"> Continue collaboration with ITF to map vessels and verify their working conditions, particularly those not covered by an approved CBA. This collaboration will be increasingly important due to the developing situation in Ukraine and the high numbers of Ukrainian seafarers. We will be undertaking a review of the logistics functions. Modern slavery will be included as part of this review.

	Potential Risk	Aim	Progress in FY21/22	Next Steps
Services and GNFR	Lack of visibility of our GNFR supplier operations could lead to a heightened risk of undetected modern slavery issues.	Increasing transparency of how our service providers and GNFR suppliers operate, to be able to identify and guard against modern slavery risks and to help them do the same.	<p>We continue our screening program of existing suppliers and as part of the onboarding process across GNFR suppliers. Through this, we proactively engage with our suppliers enabling a more impactful approach across our supplier base. Our membership with the Indirect Procurement Human Rights (IPHR) forum helps us to engage further with our industry peers on common themes and share best practice.</p> <p>Relevant progress in this area:</p> <ul style="list-style-type: none"> • Our vendor onboarding processes ensure we conduct a focused initial screening of GNFR suppliers to identify where there may be a heightened risk enabling identification of suppliers requiring deeper due diligence. • We have developed our deeper due diligence assessment for suppliers who are identified as requiring a more detailed review through a more in-depth modern slavery questionnaire. • Following the detailed screening of those suppliers highlighted as a potential risk within our GNFR supply chain, we provide reporting to Senior Management based upon an agreed risk grading. • We continue to ensure all new contracts include a modern slavery clause with our own standard contracts, purchase orders and terms and conditions updated to incorporate this and to underpin New Look's policy requirements. • Work with suppliers who are flagged as high or above average risk from our in-depth modern slavery questionnaire to support them in respect of modern slavery. This will include a requirement for completion of a mandatory eLearn module. • Our risk and compliance team send an annual modern slavery questionnaire to suppliers to identify any potential risks. This is shared back with the business to enable any actions to be taken. During FY22, the annual questionnaire identified low risk, which indicates our suppliers are taking relevant steps to protect against modern slavery and human trafficking. 	<ul style="list-style-type: none"> • Taking the learnings from the last year, we will further develop due diligence for smaller suppliers. • We will continue to apply the reassessment of our high-risk categories within our existing supply bases working with our internal relationship owners to improve awareness of modern slavery across our GNFR supply chain. • We look forward to the launch of our suppliers eLearn module which will be a key tool in supporting this education piece for our GNFR supply chain • Throughout FY23 we will continue to revisit our existing supply base focusing on high-risk categories to assess their policies and practices through collection of data using our revised in-depth modern slavery questionnaire.

	Potential Risk	Aim	Progress in FY21/22	Next Steps
Our Partners	Failure by our partners to comply to the Modern Slavery Act, leading to heightened risk of modern slavery arising within their business operations.	We recognise that it is important to work with our partners, to align with our zero-tolerance approach to modern slavery and human trafficking.	<ul style="list-style-type: none"> • We created a set of minimum requirements for our brand partners. This includes an assessment of the following areas: <ul style="list-style-type: none"> ◦ Ethical compliance (including modern slavery statement) ◦ Transparency of the supply chain • We experienced a delay to our e-Learning module being fully developed. This is now complete and will be rolled out over the next financial year to support the development of our international partners. 	<ul style="list-style-type: none"> • Update our franchise manual to include latest business policies and situational action plans. • Issue a new Franchise SAQ to both existing partners and new partners that we are looking to onboard with a review/ remedial action to ensure they meet business expectations. • Incorporate modern slavery and human trafficking risk assessment within the annual business review meetings. • Implementation and roll out to partners of the e-learning module.

NEXT STEPS

Our modern slavery agenda has not deviated from our direction of travel. It's vital we acknowledge that modern slavery can happen in any area of our business and criminal exploitation is difficult to uncover, which is why an evolving risk mitigation approach is essential.

We continue to recognise the risks our value chain faces by regularly mapping emerging risks to determine our priorities. We have a responsibility but cannot tackle it all alone, which is why we always advocate for collaborative approaches.

The Modern Slavery Working Group is a cross-business forum, reporting into our ESG Steering Group. Next year, we will prioritise the following areas:

- Continue our efforts to deliver training to increase awareness of modern slavery across our own organisation, relevant external parties and key contractors. We will increase our focus on our growing third-party brands, concessions, franchise and logistics partners.
- Work in greater depth with our logistics teams, as part of our new partnership with International Transport Worker's Federation (ITF), to better map and understand vulnerabilities linked to global transport and work collaboratively to mitigate these.
- To remain alert to existing and emerging modern slavery risks, we will explore collaborative partnerships and local civil society organisations, including on issues such as Ukraine and Uyghur labour, as well as supporting greater access to remedy.
- Where visibility is clouded, we commit to achieving greater transparency throughout our value chain. Our [2022 Sustainability Report](#) outlines this and we will be reporting in June 2022 on progress.
- We will continue to seek guidance and support from expert organisations on handling any modern slavery cases.
- We will continue to raise awareness and build the capacity of our varied supply chains, including policy reviews, particularly on whistleblowing.

New Look's Modern Slavery Statement was prepared by our Modern Slavery Working Group and approved by the Board of Directors of New Look Retail Holdings Limited 21 June 2022.



Helen Connolly
Chief Executive Officer
New Look Retail Group Ltd.
21/06/2022