

MODERN SLAVERY STATEMENT

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

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

This report documents progress made to the end of the financial year 2019/20. We are publishing this document in line with our annual report, which was delayed because of the COVID-19 pandemic.

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

WHO ARE WE?

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

The business in numbers



£999.7M

FY20 REVENUE

Revenue £999.7m for 52 weeks to 28 March 2020 for continuing operations



10,087

EMPLOYEES



1,404

PEOPLE

Total number of agency workers employed FY20
In our DC, Stores and Support Centres



574

STORES WORLDWIDE

511 including franchise supplied (505 owned) as at 28th Mar 2020



66

COUNTRIES

We deliver to 66 countries through newlook.com



80%

PRODUCTS

c.80% of products are by our top 10 suppliers

OUR VALUE CHAIN MODEL

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

We expect and insist that our suppliers look after their workers, but we also believe that, as a major customer of some of our suppliers, we too have a responsibility to promote and protect the welfare of those workers too. We do this by sharing knowledge and risk-awareness with our suppliers and making our requirements and expectations very clear.



Own Operations

During FY20 we:

- operated circa 500 stores in the UK and Republic of Ireland;
- had support centres located in London and Weymouth
- operated one distribution centre in Staffordshire which distributed all stock to our stores, franchise and wholesale partners and fulfilled global E-commerce orders.

At the end of FY20 we employed 10,087 people. During FY20 we employed a total of 1,125 agency colleagues in our UK distribution centre and a further 279 in our UK stores and Support Centres.

Supply Chain: Goods For Resale (GFR)

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

Many people are involved in supplying our products before they reach our distribution centres. We have a global supply chain of c.140 suppliers and a network of over 550 factories across 24 countries, involving approximately 252,000 employees. This is how we map and describe our GFR supply chain:



Services and Goods Not For Resale (GNFR)

These are services and goods that we buy because they are needed for our business to operate; they are not sold to our customers. These services and goods include warehouse management, garment processing, outsourced customer deliveries, logistics, IT, utilities, cleaning and customer care. We procure these services and goods from more than 1,200 suppliers, using a category management methodology.

Partnerships- Franchise stores and third party E-commerce

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

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 supply chains, but also in outsourced employment (agencies) further down our GFR supply chain.

Our main board is ultimately responsible for compliance, but all directors within the business are responsible for ensuring that the Anti-Slavery and Human Trafficking Policy upholds the necessary legal and ethical duties – and that all employees adhere to it. Heads of departments have primary accountability for implementing the policy in their specific areas and we act to ensure that our suppliers, contractors, partners and businesses further down our supply chains are aware of and understand their obligations and uphold the policy in their businesses and onward supply chains.

Several of our other policies support our commitments in this area:

- Our Equal Opportunities and Dignity at Work policies outline the ways we look to eliminate discrimination and keep our workplaces free from any form of bullying or harassment.
- Our Ethical Aims reflect our commitment to acting ethically (and with integrity) in all our wider business relationships.
- Our Code of Business Ethics explains the ethical standards that we require from our employees and those who we work with. We continuously develop and revise the code to deal with new risk areas as we or our industry evolve.
- Our Whistleblowing Policy encourages employees to report any wrongdoing and provides a clear procedure for raising concerns. We extend the principle of whistleblowing to our supply chains too and we continue to explore ways to make our whistleblowing facilities more accessible and co-ordinated across our whole business.

We understand that we need to drive initiatives beyond our own business 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:

- Refugee policy
- Child labour policy
- A ban on Uzbek and Turkmen cotton
- Homeworker policy
- Migrant and contract worker policy
- Anti-Slavery and Human Trafficking policy

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

RISK PRIORITISATION

We have a responsibility towards every individual who contributes to our business. When it comes to our suppliers and partners, we insist on appropriate standards being upheld.

We recognise that modern slavery may affect our people and supply chains and have identified that the below groups are more vulnerable to the risks of modern slavery:

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

Our core responsibility is to have visibility of the areas that are at greater risk of modern slavery and to ensure that workers are protected. Therefore, we focus our efforts according to the risk factors.

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

As a result, we have prioritised mapping our supply chain and identifying areas where workers are engaged through agencies.

Our overall group risk management process is constantly evolving. In our GFR supply chain we use a baseline risk assessment (for our key sourcing countries) as well as our suppliers' factories' profiles to make more informed decisions.

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

DUE DILIGENCE

Our (own) operations

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

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

The recruitment agency used in our UK distribution centre is regularly audited. Monthly management reports are provided to our Head of Logistics (detailing the recruitment activity and nationality of our temporary workers). Since April 2017, our distribution centre has also operated an independent and well-communicated hotline for workers to report issues safely and confidentially.

Our goods for resale (GFR) supply chain

We monitor our Tier 1 GFR supply chain through independent third-party audits and specialised programmes. Our in-house Sustainability team and partner organisation, the Reassurance Network, also do site visits and promote transparency in the factories we use.

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

We are members of Sedex, Business Social Compliance Initiative (BSCI) and Sustainable Apparel Coalition (SAC) and use their supply chain management protocols and platforms as the preferred choices for our factories to follow.

As a founding member of the Fast Forward programme, we use their audit methodology to assess our UK sites and to evaluate modern slavery risks through a series of indicators. Every factory must hold training sessions to raise awareness on noticeable issues, which then have to be checked by their management team.

To promote a more transparent supply chain, we signed the Transparency Pledge in 2017 and since then have been publishing our Tier 1 factory list on our group website biannually. This year we furthered our commitment and started publishing our Tier 1+ and Tier 2 lists. In FY 2019/20, we were ranked amongst the top 17% of scorers out of the 250 brands in the Fashion Transparency Index.

COVID-19

The Covid-19 pandemic has impacted the fashion industry and global supply chains in a way that has been unprecedented. We are constantly reassessing the growing related risks to the health and wellbeing of workers in our supply chain.

A key priority for our business is to ensure that workers in our suppliers' factories have a safe working environment and are getting paid as they should. As a part of our due diligence, we have been working with our suppliers and their factories to ensure that workers have been getting their monthly wages paid, as per local law guidelines and have taken the appropriate action to provide support where necessary.

To promote a safe working environment, we rolled out a checklist to all our factories to ensure that they are operating safely and considering local and international guidelines as a precaution. The checklist has been formed using guidance from the International Labour Organisation (ILO) and The Re-Assurance Network (TRN), and focuses on health and safety, policies and awareness.

In the UK, to respect the localised lockdown in Leicester, we put all our orders on hold to stop the movement of goods in and out of the lockdown area. Additionally, against a backdrop of increased enforcement of health and safety measures in Leicester we have supported in the information gathering and reporting of risk to the appropriate authorities.

Through our partnership with TRN we have also been carrying out virtual visits, where our primary focus has been on health and safety (including personal protective equipment), policies and procedures, worker transport, accommodation and wages payment. We are continuing to roll out these virtual visits and plan to cover as much of our supply chain as possible.

Our services and goods not for resale supply chain

During FY20, we continued to embed our updated Modern Slavery screening processes, which we created following our engagement with Anti-Slavery International for our GNFR suppliers. We still experience some challenges with suppliers in terms of engagement to enable us to assess both the level of awareness of modern slavery across our supply chain, and practices adopted to mitigate risk. However, through increasing communication at the outset about our principles and approach to Modern Slavery we believe we are making good progress.

Our supplier onboarding processes includes an initial basic screening with more due diligence for suppliers where a risk might be present. Risk is decided by using an objective risk scoring methodology.

We continue to revisit our existing GNFR supply base by working through our higher risk commodities first. 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.

During FY20 we became members of the Indirect Procurement Human Rights Forum and, with our already established relationship with Anti-Slavery International, look forward to continuing to improve the channels of communications in respect of Modern Slavery across the GNFR space.

Our Franchise stores and 3rd party e-commerce partners

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

Internal audit and assurance

Corporate Social Responsibility is a risk area on our Corporate Risk Register, and in the 'Risks and Uncertainties' section of our Annual Report – key factors used to inform our annual Internal Audit Plan and assurance work.

In FY19, Corporate Social Responsibility was included on our annual Internal Audit Plan. An audit review was completed which focused on the organisational control environment for managing the CSR risks.

The Internal Audit team provides on-going support to the Modern Slavery Working Group. In FY19, a risk assessment of the employment agency who source workers for our distribution centre was completed to support the analysis of CSR risk.

The FY20 Internal Audit Plan includes a planned follow up, revised assurance statement and an updated risk register will be produced.

Access to remedy

When other channels in the workplace fail, it is essential to empower workers, so that they feel that they can speak up and raise any concerns in confidence. We have whistleblowing helplines for the GFR factories in two of our strategic countries: Bangladesh, through the Accord; and the UK, as part of the Fast Forward programme.

To guarantee access to remedy for workers in the countries that we source from, we will build an approach based on solid due diligence. This year, through our partnership with Anti-Slavery International, access to remedy is a key focus area that we need to address. During FY20, we will continue working with Anti-Slavery International to develop an access to remedy plan that is based on sector best practice key indicators and high-risk countries. This will help us target how we can best support affected workers.

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

In FY20, we logged nine reports of alleged issues raised by factory workers in the UK. The nature of issues encountered included unauthorised subcontracting, alleged discrimination, unfair dismissals, concerns about working hours, issues relating to workers' pay, holiday and overtime pay and concerns about working conditions. We addressed each report on a case-by-case basis and followed up with tailored remediation plans that would protect workers against repercussion. We received no calls to our own UK distribution centre whistleblowing helpline.

While we have had many examples where access to remedy was required, they were not related to modern slavery. They were related to other areas, including dispute resolution cases between factories and unionised workers.

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

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

Training

We provide training by way of e-learning to all our in-house employees about the risks and possible indicators of modern slavery and human trafficking. This is mandatory and must be completed within four weeks of an employee's start date. As part of the training we encourage employee vigilance and willingness to challenge a situation.

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

The content of the training is reviewed annually, and it is also mandatory for employees to complete each year. Compliance is monitored centrally.

We are aware that bonded labour is an issue in some of the countries that we source from and it is something we completely oppose.

This year, we have continued to participate with the Nalam programme. We are working with the ETI to improve the conditions of young female mill workers in Tamil Nadu – who seek to promote ethical recruitment and combat exploitative labour practices.

Our membership with the ETI BRC Fast Forward and our membership of the Private Public Protocol focussed on Leicester and UK labour practices continues to tackle labour abuse in the UK garment industry. In the UK and Turkey, we are working with the ETI to define the next steps to embed social dialogue training in a larger share of our supply chain. We also continue to be a part of the ILO Score Programme, which targets to improve productivity and working conditions in small and medium enterprises.

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

We are dedicated to focussing our attention on proactively training the people in our supply chain. This year, through our partnership with Anti-Slavery International, our procurement and supply chain team for goods not for resale attended a training workshop on how to refine our risk assessment and due diligence mechanisms to prevent and protect vulnerable workers.

PARTNERSHIPS

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

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

To meet our global CSR goals and address the issues facing the fashion industry, we think that it is vital to partner and work with the following:

- Governments
- The private sector
- Civil societies (e.g. NGOs and Trade Unions)
- Other stakeholders

During FY20 we strengthened our existing partnerships and forged some new ones. The key collaborations and initiatives we are part of, which help support our commitment are:

Partner	Who	Purpose	Working together
Action Collaboration Transformation (ACT)	ACT is a ground-breaking, precompetitive initiative between international brands and retailers, manufacturers, and trade unions to address the issue of living wages in the textile and garment supply chain through purchasing practices.	Living wage	As an active participant in ACT initiative, we assessed our purchasing practices within the ACT framework and now taking relevant actions to improve on focussed areas
Anti-Slavery International (ASI)	ASI is an international human rights organisation working to eliminate all forms of slavery and slavery like practices throughout the world	Modern slavery	We partnered with them in 2019 to support us in strengthening our modern slavery risk assessments and due diligence.
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 in lower tiers	BCI contributes to our target of 100% sustainable cotton by 2021. Better Cotton is produced by farmers who implement seven principles, including Decent Work
British Retail Consortium (BRC)	BRC is the trade association in the UK, which we are members of.	Modern slavery	In 2019, we joined the BRC's Better Retail Better World initiative
Ethical Trading Initiative (ETI)	ETI is a global alliance of companies, trade unions and NGOs that promotes respect for workers' rights.	Labour rights	We adopted the ETI's Base Code of Conduct, which is based on the standards of the International Labour

			Organisation (ILO) as the foundation of our Ethical Aims. Under those aims, employment should be freely chosen, forced bonded or child labour cannot be used.
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 in UK supply chain	We implement this programme in our UK supply chain Tier 1 sites and in 2020 will be implementing across 100% UK supply chain including 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.
SMART Myanmar	SMART is funded by the European Union and co-funded by private sector partners and aims at improving working conditions, promoting labour and environmental standards and reducing labour right abuses in the textile and garment industry.	Management system improvement	In 2019, we partnered with SMART Myanmar to deliver HR Management and Social Compliance training in three factories
The Reassurance Network	TRN is a close-knit team of specialists located who in major sourcing regions helping manufacturers, suppliers and agents to understand and improve working conditions and factory performance.	Modern Slavery	We partnered with them in 2019 to support us in the implementation of on-the-groundwork in several sourcing countries

PROGRESS

We have identified several priority areas at a greater risk of modern slavery.

We committed to report on the priorities set out in the below table and have highlighted the progress we have made.

We continue to renew and monitor the risks faced by our business and the consequent priorities on an ongoing basis.

	Potential Risk	Aim and Progress in FY 19/20
Our Own Operations	<p>Labour providers we use not adhering to the high standards set out in our policy, including a prohibition on charging fees to workers, for example. Such failure results in a high risk of forced labour situations.</p>	<p>Aim: To protect agency workers in our own operations</p> <p>Progress</p> <ul style="list-style-type: none"> • We have used a single agency: GI Group, since May 2017 to supply our Distribution Centre, the main area in our business where we rely on temporary agency labour, particularly at peak times. GI Group does not use overseas partners, and only recruits foreign workers already resident in the UK, which reduces the modern slavery risks associated with travel for work. They operate robust checks for modern slavery indicators, such as duplicated bank details (suggesting someone else may be collecting workers' wages), similar mobile phone numbers (suggesting SIM cards may be bought and distributed in bulk to groups of workers) and forged or invalid personal documents. Our time and attendance systems also safeguard against worker substitution. • GI's commitment as a Stronger Together Business Partner and being an active member of The Association of Labour Providers, The Recruitment and Employment Confederation and the GLAA Labour Provider/User Group provide us with a consistent flow of information and support tools. • GI Group is regularly audited and provides monthly management reports to show the recruitment activity including the nationality of our temporary workers. They assess, recruit and on-board all our agency workers on our behalf. In a Peak period (cyber for example) 38% of our warehouse workforce would be employed through the GI Group. Our normal run rate (when not in a peak period) of agency workers is 28% of our warehouse staff. <p>We engaged with the IPHR Forum at the end of FY20 to focus on various areas of our GNFR supply chain.</p>

<p>Goods for Resale supply chain</p>	<ul style="list-style-type: none"> • Potential for heightened risks of modern slavery going undetected if the supply chain is not transparent. • Risk of unauthorised subcontracting. 	<p>Aim: Continually increase the transparency of our product supply chain.</p> <p>Progress:</p> <ul style="list-style-type: none"> • We started publishing our Tier 1 factory list on our group website in September 2017: This is updated biannually <ul style="list-style-type: none"> ◦ In March 2020, we published our Beyond Tier 1 factory list on our website for the first time, which includes tier 1+ and tier 2 sites. ◦ China and Bangladesh represent 53% of the total workforce for Tier 1 factories. • In FY20 we sourced 79% of our products from our 10 largest suppliers and have mapped 85% of their Tier 1+ and Tier 2 supply chains, including tanneries making leather products. • We are continuing to work towards our sustainability agenda with ambitious targets to limit the impact at every step of our supply chain. We will increase transparency further with the following targets: <ul style="list-style-type: none"> ◦ 100% of wet processing units disclosed by 2020, with additional plans to monitor and promote the best practice in place. With the launch of New Look Kind (products with declared sustainable credentials) in September 2019, we increased our mapping of lower tiered units. Unfortunately, Covid-19 has impacted our progress in this area. ◦ 100% sustainably sourced cotton by 2021. – End of FY20, we had reached 40.4%. (Spring Summer '20: 68%) sustainably sourced cotton in our products. ◦ 100% traceable and sustainable viscose by 2023. – End of FY20, we had reached 5% traceable viscose. (Spring Summer '20: 35%) • In the UK, we have assessed Tier 1 and Tier 1+ against the Fast Forward standard. We will further roll out the standard to the warehouses and reprocessing units in the next financial year. We had planned to start the visits in March 2020 but they had to be delayed due to Covid-19. • We have operated an unauthorised subcontracting policy for several years, requiring all Tier 1 factories manufacturing New Look product to be registered following our Sustainability requirements prior to production being placed. This reporting year we have had one case of unauthorised subcontracting linked to financial penalties.
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<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Goods for Resale supply chain</p>	<ul style="list-style-type: none"> Suppliers' use of migrant workers recruited through agencies can put workers at risk of exploitation, unaware of their rights and terms of contract. Migrant workers are recognised as more susceptible to debt bondage. 	<p>Aim: Set out clear standards which must be met on the use of migrant workers</p> <p>Progress: We have a migrant labour and contract worker policy which is included in the supplier manual. This policy can be found on our website.</p> <p>Aim: Achieve a clearer picture of the use of migrant workers in our supply chain.</p> <p>Progress: We conducted a preliminary risk assessment using data from Tier 1 third party audits:</p> <ul style="list-style-type: none"> Migrant workforce represents 7% of the total workforce globally. 95% of the global migrant workforce concentrates in China, where 57% of workers are migrant. Although we have no tier 1 or tier 1+ factories registered in Xinjiang region, we are actively mapping our cotton supply chain to ensure that there is no risk of forced labour. Other countries with a high proportion of migrant labour are the United Arab Emirates with 100% (only in one factory), followed by the UK with 25% and then Italy with 13%
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Goods for Resale supply chain</p>	<p>Suppliers' failure to have in place proper HR controls can lead to children being employed illegally.</p>	<p>Aim: Ongoing implementation of our child labour policy and remediation plan</p> <p>Progress:</p> <ul style="list-style-type: none"> 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 FY20. 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.
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Goods for Resale supply chain</p>	<p>Refugee workers are more vulnerable to human trafficking, forced, and bonded labour. Refugee workers are particularly prevalent in Turkey.</p>	<p>Aim: To support the no discrimination and fair treatment of refugee workers when found in our supply chain.</p> <p>Progress:</p> <ul style="list-style-type: none"> We continue to implement our refugee policy and remediation plan to our supply base in Turkey. <ul style="list-style-type: none"> Since the implementation of our refugee policy and remediation plan in 2016 we found nine cases of refugees working without a work permit. In FY20, no new cases of were reported All cases found have been dealt the same way, with factories respecting worker rights, treating them the same as the rest of other workers as well as helping workers apply for a work permit. We are part of the ETI working group in Turkey and will continue our commitment to this collaborative platform.

<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Goods for Resale supply chain</p>	<p>Suppliers must ensure their labour providers meet our standards. Failure could result in a risk of forced or bonded labour situations.</p>	<p>Aim: Understanding risks faced by the agency workers in our supply chain</p> <p>Progress:</p> <ul style="list-style-type: none"> • In FY20 we signed the Turkmenistan Cotton Pledge hosted by the Responsible Sourcing Network to confirm our commitment that we will not knowingly source Turkmen cotton for the manufacturing of any of our product until the govt. ends the practice of forced labour • FY20 we have risk assessed and mapped agency workers in our Tier 1 supply chain. <ul style="list-style-type: none"> ◦ 1% of the total workforce globally is formed by agency workers. ◦ 94% of these workers are in factories in 3 countries: India, Turkey and Sri Lanka. ◦ Our data by country shows that 14% of the Indian workforce is agency workers, representing 71% of the agency workforce globally. This number is followed by Turkey, where 1% of the workforce is agency, and that is 12% of the total agency workforce globally. ◦ Our reporting shows that Sri Lanka, Turkey and Morocco have the highest number of young workers (under 18 years of age). • In the UK it is standard practice to map and screen compliance of labour providers through Fast Forward. Our data shows that 16% of the Moroccan workforce is temporary, accounting for 25% of total temporary workforce globally.
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Goods for Resale supply chain</p>	<p>Women workers are particularly vulnerable to exploitation.</p>	<p>Aim: Identify concentrations of women in our supply chain who may be in a vulnerable position.</p> <p>Progress:</p> <ul style="list-style-type: none"> • Like migrant and agency workers, we also carried out the same analysis in the last financial year for identifying concentrations of women workers in our Tier 1 supply chain. <ul style="list-style-type: none"> ◦ According to our data, 53% of the total workforce of our Tier 1 supply chain is female. ◦ 40% of the total number of female workers globally are in these five countries Bangladesh, China, Turkey, Cambodia and Myanmar. ◦ In India, we are working with ETI to deliver Nalam programme in our supply chain.

<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Services and Goods Not for Resale</p>	<p>Lack of knowledge about our suppliers, leading to a higher risk of undetected modern slavery issues.</p>	<p>Aim: Increasing transparency of how our service providers and goods not for resale suppliers operate, to be able to identify and guard against modern slavery risks and to help them do the same.</p> <p>Progress: Following our engagement with Anti-Slavery International, we continued to embed our improved screening process across the GNFR space and considered how we could take a more impactful approach across our supplier base. We have also become members of Indirect Procurement Human Rights (IPHR) forum 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"> • By the end of FY20 we improved our vendor onboarding processes to ensure we conduct a more focused initial screening of GNFR suppliers to identify where there may be a heightened risk were well embedded and enabling filtering of suppliers requiring deeper due diligence. • We further developed our secondary assessment for suppliers who were 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 are introducing monthly 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. • Throughout FY21 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. This will include any impact arising from Brexit. • We will leverage our relationships with bodies such as Anti-Slavery International and IPHR to engage with high-risk commodities such as logistics to ensure that the importance of Modern Slavery and how we guard against it becomes a collaborative programme between us and our suppliers
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Our Partners</p>	<p>Failure by our partners to comply with our standards, leading to increased risk of modern slavery arising in their businesses, operate under our brand.</p>	<p>Aim: Our first focus remains on our own business and supply chain, but we recognise that it is also important to work with our partners to highlight modern slavery as an issue and check they are complying with our policy.</p> <p>Progress:</p> <ul style="list-style-type: none"> • In FY19 we updated all our standard contracts (also referenced in our Letter of Intent which is used ahead of a new partner signing our long form agreement) to include our Modern Slavery Policy. • We experienced a delay to our E-Learning module being fully developed. This is now complete, and we will roll this out across all partners as we still believe that this is the best way to make clear the standards we expect from our International Partners.

NEXT STEPS

Our modern slavery agenda has not deviated from where we want to take it. However, it is key to acknowledge that modern slavery can happen in any area of our business and that criminal exploitation can be difficult to uncover. We have recognised the risk that our supply chain faces and mapped its key areas to determine our priorities, but we are unable to tackle this all on our own.

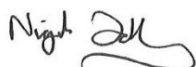
That is why we are advocates for collaborative approaches where possible.

We must rely on local organisations to help us understand any underlying issues workers at risk may face, who to support first and who requires support most. We aim to achieve this with training on various fronts or access to remedy.

Next year, our focus will be on the following areas:

- We will continue our efforts to deliver training to increase awareness across our own organisation, relevant external parties and key contractors. We will focus on our growing 3rd party brands and our logistics partners.
- We will place a strong focus on tailoring a collaborative approach and remain alert to existing modern slavery risks that are shared across the industry. We commit to agreeing an approach to growing concerns surrounding potential bonded labour in Chinese supply chains and in supporting industry initiatives to ensure Modern Slavery is not present in UK supply chains, in particular Leicester.
- Where visibility is clouded, we commit to achieve greater transparency throughout our supply chain. To reach our goal, we will embed targets across the organisation, such as pledges including: 100% sustainable cotton by 2021 and 100% traceable viscose by 2023. We also promise to map our wet processing units for chemical management and the embedding of worker demographic analysis for our GNFR suppliers.
- We will continue to seek guidance and support from expert organisations on handling any modern slavery cases.
- We will continue to raise awareness and build the capacity of our varied supply chains. This work will also include a renewed approach of our whistleblowing policy.

New Look's Modern Slavery Statement was prepared by our Modern Slavery Working Group and approved by the board of directors of New Look Retailers Holding Limited on 3rd November 2020.



Nigel Oddy

Chief Executive Officer
New Look Retail Group Limited
03 November 2020