

MODERN SLAVERY STATEMENT

At New Look, we strive to take all necessary steps to protect and enhance the lives of people across our business and those in our global value chain. We understand and recognise that no industry or country is immune to the severity 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 2022/23.

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, war in Ukraine, earthquakes in Turkey, changes in legislation, 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 within our direct and indirect operations.

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 56 countries with 41 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



£844.7M

FY23 REVENUE



9,140

EMPLOYEES

Total number of colleagues across our own operations directly employed



1,814

PEOPLE

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



414

STORES WORLDWIDE

414 stores across the UK and ROI, as of March 2023



56

COUNTRIES

We deliver to 56 countries through newlook.com



78%

PRODUCTS

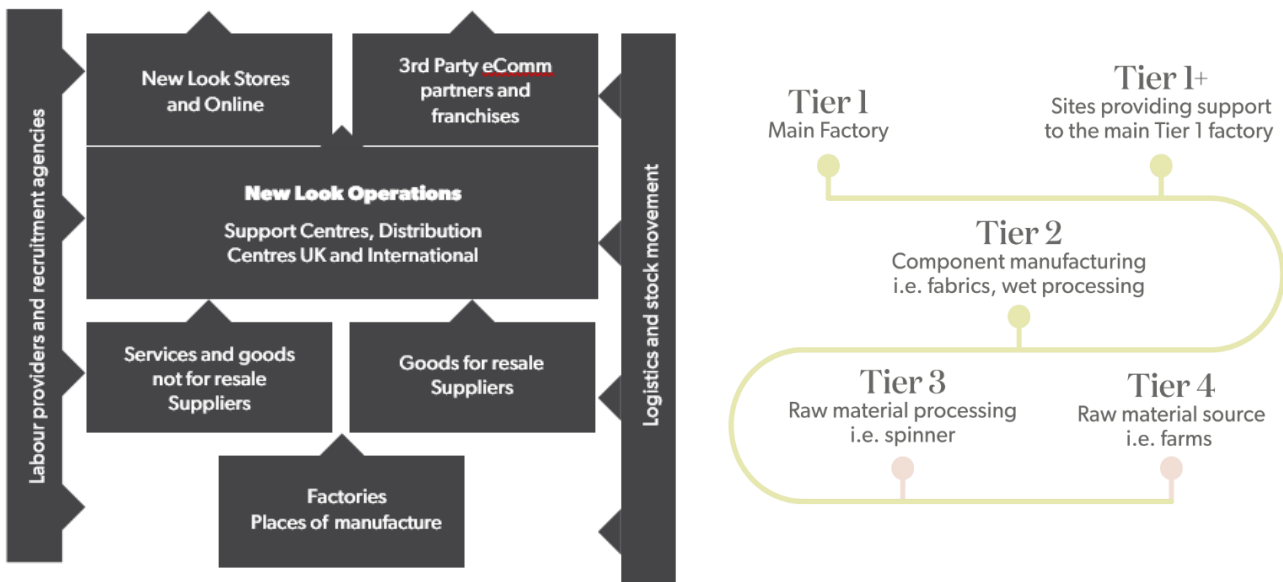
78% of products are supplied by our top 10 suppliers

OUR VALUE CHAIN MODEL

We have mapped our value chain to better understand the areas at risk and update this twice a year. All sites across our Tier 1, as well as those Beyond Tier 1, are published on our [corporate website](#), as well as the [Open Supply Hub](#). 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.

We map our operations as follows:



OUR BUSINESS

Own Operations

At the end of financial year 2022/23 9,140 people were employed by us. In that time, within our UK distribution centre, we employed a total of 1,650 agency colleagues throughout the course of the year, as well as a further 164 in our Support Centres.

- 414 stores in the UK and Republic of Ireland were in operation.
- We have 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. All of which have subsequently closed.
- From November 2022, we introduced New Look concessions in 2 Tesco stores

From April 2022, our current freight partner, EV Cargo, provided support with routing stock to several of our wholesale partners and marketplace via their centres in Germany. All appropriate due diligence was undertaken as part of this process. This ensured adherence to internal modern slavery requirements and the 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)

Many people are involved in supplying our products before they reach our distribution centres. New Look's supply chain includes 106 active suppliers and 426 Tier 1 sites (30 fewer than FY22). Additionally, there are 734 sites across Tiers 1+ to Tier 3, making a total of 1,160 factories across 24 countries. Our supply chain involves around 350,000 workers. These suppliers and factories are responsible for providing New Look branded products to our stores and online platforms.

Services and Goods Not for Resale (GNFR)

These are services and goods that are purchased 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, Digital, Marketing, Facilities Maintenance, utilities, cleaning and customer care. We procure these services and goods from more than 1000 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. In September 2022 we launched our first European marketplace with Zalando, selling into 8 countries on the continent and fulfilling through our German warehouse operation. 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.

Kind to Our Core strategy

In January 2022, we introduced our Sustainability Strategy Refresh under the 'Kind to Our Core' initiative. The strategy comprises four core pillars: Responsible Business, Responsible & Circular Product, Inclusive Culture, and Positive Local Impact. The social sustainability team are largely responsible for overseeing the delivery of the ambitious targets and KPIs associated with the Responsible Business pillar. Our primary focus is prioritising people and minimising environmental impacts while fostering transparency. Further details on our progress towards the targets under this pillar can be found in our [Sustainability Update 2023](#).

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 value 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.

We have developed several policies and statements that form part of our social sustainability agenda. As part of our supplier manual and trading and compliance standards, suppliers commit to the below policies which are updated annually. They are required to distribute these policies to the lower tiers of their value chain.

The following policies and statements are publicly available:

- [Refugee Policy](#)
- [Child Labour and Young Worker Policy](#)
- [Homeworker Policy](#)
- [Migrant and Contract Worker Policy](#)
- [Anti-Bribery Policy](#)
- [Human Rights Statement](#)
- [Subcontracting Policy](#)
- [Xinjiang Uyghur Autonomous Region \(Uyghur Region\) Sourcing Policy](#)

Additional:

- Whistleblowing Policy

As part of our work on improving purchasing practices, we have also updated our Responsible Onboarding 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. Through our materiality review and risk assessment, we have identified our salient risks within our GFR value chains in key sourcing regions. This has enabled us to prioritise our strategic focus and determine our ability to influence as outlined in our [2022 Sustainability Strategy Refresh](#) and reported against annually. Our latest report can be found [here](#).

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 outcomes and any issues found. In the UK, all sites must participate in the Fast Forward program. Audits are conducted for Tier 1 and Tier 2 sites, with some visits occurring in lower tiers as well. We work closely with our suppliers and factories on remediation by providing improvement plans and recommendations for issue closure. Progress is closely monitored over a specified period, based on issue severity. High-risk sites are revisited earlier to ensure verification of remediation.

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 and 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

Human Rights Due Diligence (HRDD)

As a business we are transitioning from a compliance-led strategy to a Human Rights Due Diligence (HRDD) approach in line with the UN Guiding Principles on Business & Human Rights (UNGPs). This shift allows us to proactively address human rights risks with our key partners, monitor ongoing risks, and collaborate on remediation and solutions. This change in approach requires capacity-building across our value chain to ensure HRDD approach is implemented.

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, as indicated by our ESG Self-Assessment Questionnaire for GNFR.

This year we saw a 56% reduction in the use of agency workers within our operations, which can be attributed to a significant reduction in demand from both our ecommerce and retail operations as well as our strategic move to a tighter stock model which resulted in a 28% reduction in product bought compared to last year.

New Look works with Job and Talent as sole agency provider in our UK distribution centre, who 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.

We have 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 sites, Tiers 1-3 through independent, third-party audits and specialised programmes. In addition, our in-house sustainability team and partner organisation, The Reassurance Network, conduct site visits to promote transparency and assess risk.

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. This information is gathered during factory registration, audits, and regular supplier reporting. 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. We actively participate in the annual [Fashion Transparency Index](#) by Fashion Revolution, which evaluates our disclosure on social and environmental indicators across the industry.

Going forward, we will be drawing on recognised frameworks to support our focus on risk to people through capacity building and aim to implement on the ground projects where appropriate. We have revised our visit requirements with The Reassurance Network to improve data collection in line with our ambitious sustainability targets.

GNFR

Our supplier onboarding processes include an initial basic screening. Where a risk might be present, a deeper due diligence is undertaken and 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 new suppliers are required to complete our modern slavery screening 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 continue to consult with industry experts to improve the channels of communications further in respect of modern slavery across the GNFR supply chain.

Our franchise, wholesale, and marketplace partners

We currently have 72 active third-party brands and concessions, representing a significant growth of 64% since April 2022. Among these brands, one-third have already shared their Tier 1 site lists this year and look to further increase this proportion in the future.

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 social and environmental due diligence on new franchise partners that we are looking to onboard. This questionnaire enables us to conduct due diligence on potential franchise partners, identifying areas of risk where additional support may be required.

Moving forward, our objective is to collaborate with brands that have conducted limited due diligence throughout their supply chains. We aim to encourage them to adopt a more proactive and risk-based approach, taking necessary actions within their associated sites.

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 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 the International Accord, Pakistan Accord and 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.

All UK sites must be audited through the Fast Forward methodology which includes giving workers direct contact to third parties where they can raise concerns if needed. We are also supporting a community outreach programme in Leicester. This provides direct support to 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 alleged case.

Within our own operations in the UK, a confidential reporting line is in place to allow colleagues and other stakeholders to report areas of concern, including breaches.

PARTNERSHIPS

We are committed to tackling human rights issues. We also 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 impacts 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
Better Cotton	Better Cotton 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, and are signatories of the BRC Diversity and Inclusion Charter.
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 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 3, which includes manufacturing sites, reprocessing facilities, fabric suppliers 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	We have been working with ITF since March 2021 for their support on mapping shipping vessels used by our logistics providers. In early 2022, a second health check was carried out 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 FY22/23	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 (DC), the main area in our business where we rely on temporary agency labour, particularly at peak times through an on-site agency provider. During 2022/23 we moved to a new main provider Job and Talent. A key focus for us in the procurement process was establishing the safeguards Job and Talent have in place to guard against modern slavery. • The agency does not use 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. • The agency has committed to being a Stronger Together Business Partner and an active member of The Association of 	<ul style="list-style-type: none"> • We will continue to hold regular review meetings with Job & Talent to ensure our ongoing commitment to preventing modern slavery is achieved.

			<p>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.</p> <ul style="list-style-type: none"> 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 slavery. Posters are placed in the offices and canteen and notice boards showing GLAA contact numbers. 	
Own Operations	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 	<ul style="list-style-type: none"> New Look's compliance targets for mandatory completion are 95% which considers long-term sick and Mat leavers. It currently stands at 90% and steps are being taken to achieve target. A 'Welcome to New Look' working party

			<p>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.</p> <ul style="list-style-type: none"> • 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. 	<p>has been set up for subject matter experts (SMEs) to take ownership of induction material on Welcome Zone to ensure up to date.</p> <ul style="list-style-type: none"> • 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 identified one facility that were linked directly or indirectly to the labour use of Uyghur workers. We worked with the supplier directly on the matter – including halting any orders and carrying out a responsible exit from the factory. 	<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.

<p>Goods for Resale</p>	<p>Potential for heightened risks of modern slavery going undetected if the value chain is not transparent.</p> <p>Risk of unauthorised subcontracting.</p>	<p>Continually increase the transparency of our product value chain.</p>	<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 and gain further transparency as outlined in our Sustainability Strategy Update 2023. • In the UK, we have assessed Tier 1 and Tier 2 against the Fast Forward programme, and some sites in lower tiers. Since April 2022 18 Fast Forward audits have been carried out - this includes audits of our landed warehouses and reprocessing facilities. • Through Fast Forward membership, our suppliers and factories in the UK can attend training sessions on the Supplier Engagement Programme and Fast Forward. 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 continued to promote greater transparency and improved due diligence across third-party brands and concessions through our Self-Assessment Questionnaire. • We have an unauthorised subcontracting 	<ul style="list-style-type: none"> • Continue mapping of all suppliers beyond Tier 1 • 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 and warehouses.
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			policy which requires all Tier 1 factories manufacturing our product to be registered prior to production being placed.	
Goods for Resale	<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>	<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.</p>	<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. • We continue to use the migrant worker due diligence checklist as part of our risk assessment process when entering a new sourcing country. This year, this was utilised as part of our due diligence when onboarding a factory in Mauritius, a country that heavily relies on migrant labour. • We have continued to closely monitor the evolving situation in Ukraine – including collaborating with the ETI and other stakeholders to understand the impact across our business operations. We shared ETI's guidance with our European suppliers in July 2022, offering support for businesses looking to recruit displaced workers from Ukraine. Additionally, we shared Anti-Slavery International's guidance with our suppliers mid-2023 which provides businesses with advice on preventing and mitigating the risk of 	<ul style="list-style-type: none"> • Continue to rollout 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. • Continue mapping refugee populations in other key sourcing countries.

			<p>exploitation in their operations and value chains.</p> <ul style="list-style-type: none"> • 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. • 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 continued its 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 are available in all factories in their value chain providing a communication channel for refugee workers to raise any issues. The posters 	
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			are available in Turkish and Arabic.	
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"> • Continue to follow our updated Child Labour and Remediation Policy should child be found in our supply chains. • 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 FY22/23. • 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"> • Continue to review our risk assessment framework to be more in-depth across tiers and countries, which will include identifying more vulnerable groups for exploitation.
Goods for Resale	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 continued to collect gender related data through our partner Sedex. We have worked with our partner, TRN to ensure we are capturing additional gender focused information through their visits. • 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"> • Using the data we collect through Sedex and TRN visits we need to establish a baseline and focus area from our supply chain data. This will allow us to focus on programmes and projects that address gaps in our supply chain. Our specific focus will be on enhancing women's access to leadership positions.

				<ul style="list-style-type: none"> • 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.
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 conditions.	<ul style="list-style-type: none"> • After engaging with the International Transport Workers’ Federation (ITF) in FY21/22, we have continued our collaboration 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 our ongoing 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.

			<ul style="list-style-type: none"> • On review of the ITF report and the vessels identified as not ITF approved, we have requested that these vessels are not used until they have been approved by ITF. • ITF have provided us with the tool to review the ITF vessel approval status. Any vessel not approved will be identified to our Supply Chain Manager. The ITF tool will provide us with the visibility of the non-approved vessels and the data analysis from this will identify the positive result of our due diligence checks and areas of improvement. 	<ul style="list-style-type: none"> • As and when the names of vessels transporting our goods are reported to us, we will check if these vessels are subject to a live CBA on the ITF Seafarers website. • We will seek assurances and written confirmation from our logistics provider that they will only utilise vessels with full ITF CBA coverage in the transportation of our goods. • We will seek assurances from our logistics provider that all Charter Parties applicable to the vessels carrying our goods do not contravene the ability for Crew Changes to take place within contractual obligations.
Services and GNFR	Lack of visibility of our GNFR supplier operations could lead to a heightened risk of	Increasing transparency of how our service providers and GNFR suppliers operate, to be able	As outlined in our previous years' statements we have an established screening process for new suppliers to assess modern slavery risk and awareness. We continue to proactively engage with existing suppliers enabling a	<ul style="list-style-type: none"> • Our focus for FY24 will be to review our existing supplier base and using our screening process for new suppliers, assess

	undetected modern slavery issues.	to identify and guard against modern slavery risks and to help them do the same.	<p>more impactful approach across our supplier base and have continued to leverage our relationships 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"> • Through establishing our initial screening process for modern slavery risk we have been able to deliver a more focused approach in establishing where risk may be prevalent with potential suppliers. • By simplifying our modern slavery due diligence assessment, we have been able to increase our completion rate and engagement with our suppliers to a 95% return rate giving us greater intelligence into their awareness of modern slavery and the practices within their company. • Working with our Learning and Development Team we have continued to finalise our Supplier eLearning Module in readiness for launch in FY24. • We have continued to ensure all new contracts include a modern slavery clause with our own standard contract's, purchase order 	<p>their approaches to Modern Slavery</p> <ul style="list-style-type: none"> • We look forward to launching our Supplier eLearn and using this to support improving awareness of modern slavery for suppliers who score as high risk through our due diligence processes. • Working with our CSR teams, we will re-evaluate our scoring for our due diligence assessment and ensure it remains appropriate.
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			terms and terms and conditions updated to incorporate this.	
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"> In FY21/22 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 is being rolled out to support the development of our international partners. We have rolled out our 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. Over one third of these brands have shared their Tier 1 site lists this year and we will continue to increase this transparency over the coming financial year. 	<ul style="list-style-type: none"> Update our concession manual to include latest business policies and situational action plans. Continue to roll out our SAQ to all third-party brands and concessions. 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:

- To maintain our approach from a compliance-led strategy to a Human Rights Due Diligence (HRDD) approach in alignment with the UN Guiding Principles on Business & Human Rights (UNGPs).
- 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.
- Continue to collaborate with our logistics team, as part of our partnership with International Transport Worker's Federation (ITF), to better map and understand vulnerabilities linked to global transport and work collaboratively to mitigate these.
- We will focus on continue working towards increased auditing of reprocessing sites and warehouses across our UK sites.
- Focus our attention on gender equity, specifically by creating a baseline using audit data that highlights gender-related aspects. This will allow us to explore projects that promote increased women's access to leadership positions.
- 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 the war in Ukraine, displacement of people due to the earthquakes in Turkey, Uyghur labour, as well as supporting greater access to remedy.
- Where visibility is clouded, we commit to achieving greater transparency throughout our value chain. Improving our direct dialogue with lower tier suppliers. Our 2023 Sustainability Report Update outlines this.
- We will continue to seek guidance and support from expert organisations on handling any modern slavery cases.
- Expand New Look's beyond audit approach with key partners.

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 26.09.23.



Helen Connolly
Chief Executive Officer
New Look Retail Holdings Limited
27.09.2023