

## 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 we can to ensure they do not exist in any part of our business or value chain. We remain committed to developing our policies, practices and ways of working to deal with any evolving modern slavery or human rights risks within our direct and indirect operations.

### **Key Activities Undertaken During FY23/24**

- As a business, we are continuing to transition from a compliance-led approach to a Human Rights Due Diligence (HRDD) approach, working in line with the UN Guiding Principles on Business & Human Rights (UNGPs) and the OECD Due Diligence Guidance for Responsible Business Conduct. This shift allows us to proactively identify and address human rights risks within our value chain, monitor ongoing risks and collaborate on remediation and solutions. This change in approach requires capacity-building both internally and across our value chain and will also support our alignment with increasing HRDD legislation requirements.
- In 2023, we partnered with TrusTrace to begin the process of strengthening and formalising our supply chain mapping process on their platform, with the view to increase visibility of the beyond tier 1 of our value chain, enabling us to identify and prioritise risks more effectively.
- We have signed up to the Ethical Trading Initiative (ETI) Community of Practice on Gender Responsive HRDD. This is a collaborative programme aimed at addressing Gender-based violence and harassment (GBVH). The purpose of the programme is to support efforts to effectively address GBVH in high-risk supply chains, by applying gender responsive HRDD through collective action and capacity building with suppliers and factories.
- In 2024, New Look engaged with GoodWeave to increase knowledge regarding the use of subcontracting in Ready-Made Garments (RMG) supply chains in Bangladesh and to document the conditions of work, including child and forced labour should they exist.

## 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 50 countries with 385 stores in the UK and Ireland. 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



£769.2M

#### **FY24 REVENUE**



7,965

#### **EMPLOYEES**

Total number of colleagues across our own operations directly employed



1,233

#### **PEOPLE**

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



385

#### **STORES WORLDWIDE**

385 stores across the UK and ROI, as of March 2024



50

#### **COUNTRIES**

We deliver to 50 countries through newlook.com



74%

#### **PRODUCTS**

74% of products are supplied by our top 10 suppliers

## **OUR BUSINESS**

### **Own Operations**

In FY24 9,198 people were employed by us. In that time, within our UK distribution centre, we employed a total of 1,069 agency colleagues throughout the course of the year, as well as a further 164 in our support centres.

- We now have 385 stores in the UK and Republic of Ireland 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.
- We have concessions in two Tesco stores.

Our current freight partner, EV Cargo, supports the routing stock to several of our wholesale partners and marketplace via their warehouse operations in Germany. All appropriate due diligence is undertaken as part of this process. This ensures 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)**

New Look's supply chain includes 108 active suppliers and 403 Tier 1 sites. Additionally, there are 721 sites across Tiers 1+ to Tier 3, making a total of 1,124 factories across 19 countries. Our supply chain involves more than 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 to operate our business 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 1,100 suppliers using a category management methodology.

### **Global Partnerships, Wholesale, Franchise and Marketplace**

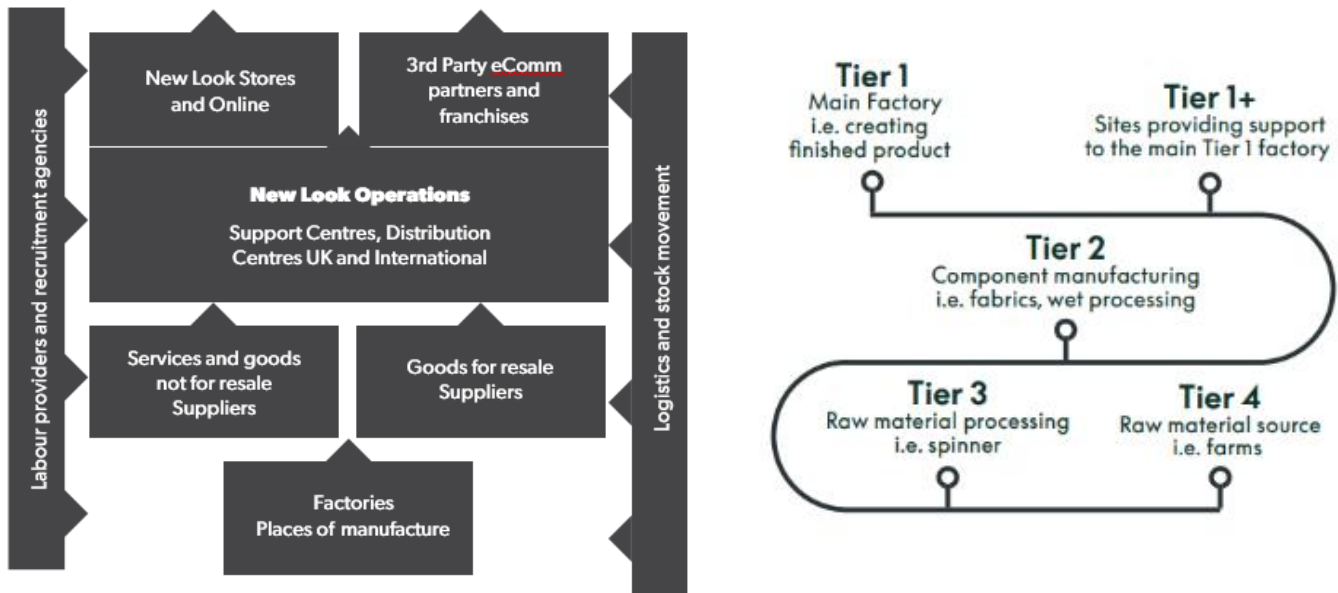
We continue to expand our third-party wholesale business with our key partners, ASOS and Very, in the UK and ROI. We have now successfully traded for over 18 months through our first European marketplace with Zalando, selling into 8 countries and fulfilling through a German warehouse operation. Marketplace is now a significant area of planned growth for the business with Zalando and other potential marketplace channels in the future. As of January 2024, we exited our franchise business in Malta.

### **Brands and Concessions**

We currently have 83 active third-party brands and concessions, representing approximately 10% of all business. Among these brands, over 60% have now shared their Tier 1 site lists this year and we are continuing our efforts to increase this number on an ongoing basis.

## OUR VALUE CHAIN MODEL

We map our own operations and tiers as below:



Ongoing mapping and monitoring is paramount to identifying risks and part of our extensive due diligence process. 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 on our corporate website and the Open Supply Hub. We actively participate in the annual [Fashion Transparency Index](#) by Fashion Revolution - it ranks 250 of the world's largest fashion brands and retailers based on their public disclosure of human rights and environmental policies, practices and impacts, across their operations and supply 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 on 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.

## RISK PRIORITISATION

We recognise that modern slavery may affect our own operations, those of our business partners and those within our respective value chains. Through our materiality review and risk assessment process, we have identified our salient Environmental, Social and Governance (ESG) risks within our operations and value chains – this has enabled us to prioritise our strategic focus and determine our ability to influence.

Our methodology is constantly evolving, based on a combination of New Look-specific requirements and other available risk matrices, including SEDEX, the ITUC Global Rights Index, OECD Guidelines and ILO standards. We also gather detailed information from our suppliers' factory profiles, third-party audit data and through visits by our partners The Reassurance Network (TRN) – they identify patterns and common issues to inform our next steps and the support needed to mitigate any risks. Our risk assessment process also takes into consideration the different worker demographics across countries,

value chain tiers and product types to identify vulnerable groups and inform a targeted approach in addressing their specific risks.

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. While 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. Together, these help us better understand the risks present in our value chain.

Through our annual risk assessment process, we have identified the below groups as vulnerable to risks of modern slavery and wider exploitation. Most risk lies in outsourced employment and beyond Tier 1 factories, as we have less direct influence and visibility of these workers and the practices of their employers. We focus our due diligence efforts according to the relevant risk factors to ensure the appropriate remediation is provided should issues be found.

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

### **Internal Audit and Assurance**

Environmental, Social and Governance (ESG) standards are 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 is 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).

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.

## **POLICIES AND GOVERNANCE**

We take 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 (e.g. agencies) further down our GFR value chains. 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.

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.

We have developed several policies that form part of our social sustainability agenda. As part of our contractual terms and conditions of trade detailed in our supplier manual, suppliers commit to the below policies which are updated annually, or in reaction to changing business operations or sourcing contexts. They are required to distribute these policies to 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
- Responsible Entry & Exit Policy

## **DUE DILIGENCE**

### **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, 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 have successfully enhanced our direct hiring process, with around 68% of our Distribution Centre (DC) colleagues being recruited directly, while the remainder were hired through our agency partner, Job&Talent UK Ltd. We maintain a rigorous review of our agency partnerships to ensure they meet our ethical standards, as verified by our ESG Self-Assessment Questionnaire for GNFR.

This year we saw a 24% reduction in the use of agency workers within our DC operations, which can be attributed to a 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 10% reduction in throughput. Agency workers constituted 27% of our Distribution Centre (DC) colleague headcount.

New Look works with Job&Talent UK Ltd as the sole agency provider in our UK distribution centre and they are regularly audited. Monthly management reports are provided to our director of logistics detailing the recruitment activity and nationality of our temporary workers. This agency 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 always be accessed, either online or by phone, and can be used to report any concerns of wrongdoing within our business or externally by our suppliers and associates. In addition, as part of our Anti-Slavery and Human Trafficking Policy, a modern slavery officer for the business has been appointed.

## **Goods for Resale (GFR)**

We monitor our sites regularly through third-party audits, site visits by our partner organisation The Reassurance Network (TRN) and through specialised programmes aimed at creating long-lasting change. In the UK, all sites must participate in the Fast Forward program. These Fast Forward assessments are conducted for Tier 1 and Tier 2 sites, with visits increasingly occurring at supplier warehouses and fabric mills. 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 and more frequently to ensure verification of remediation.

Going forward, we will continue to use recognised frameworks to support our focus on HRDD and therefore risk to people through capacity building and 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.

It is important for workers to have access to remedy and adequate channels to raise grievances. 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 several strategic sourcing countries: Bangladesh and Pakistan through the International Accord, in the UK as part of the Fast Forward programme, through our collaboration with ACT in key sourcing countries, and in Turkey through our strategic supplier's own whistleblowing line. In addition, through our close partnership with TRN, workers can raise concerns directly via local representatives. 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.

In the last financial year, any issues logged through the above whistleblowing channels have primarily been individual grievances rather than highlighting any indicators of modern slavery or human trafficking.

## **Goods not for Resale (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 pre-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 not be onboarded, those of medium risk will be required to complete our e-Learning module to support greater understanding of modern slavery and are closely monitored. Suppliers falling into a medium risk category will be made aware of areas where they are considered to lack awareness and are reassessed after a period to monitor improvement in their processes and practices. All low-risk suppliers are routinely reassessed every three years.

## **Wholesale, Marketplace and Franchise Partners**

Our new partner onboarding process requires several due diligence steps prior to the signing of any contractual agreements. All partners are required to complete the ESG Self-Assessment Questionnaire (SAQ) to carry out relevant social and environmental due diligence, and this is renewed annually. Any gaps identified in the questionnaire are followed up – this includes support offered to improve partners' internal policies regarding modern slavery. In addition, within all partners' contractual

agreements, they are reminded of their legal obligations as a business when it comes to modern slavery and they are required to comply with our company policies. Should they fail to do so any breaches will ultimately result in termination.

### Our Brands and Concessions

Prior to onboarding, all relevant brands must demonstrate their processes and policies regarding modern slavery and human trafficking through our Self-Assessment Questionnaire. For those brands required to publish a modern slavery statement, approval is not granted if they do not have this in place. In addition, all contracts with brands and concession partners reference modern slavery and must agree their commitment to adhering to these requirements within their own supply chains.

Moving forward, our objective is to continue collaboration 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.

## PARTNERSHIPS

The following collaborations and initiatives help to support us to meet the commitments outlined in this statement.

Partner	Who?	Aim
<a href="#">Better Cotton</a>	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.	Better Cotton is produced by farmers who implement seven principles, including Decent Work.
<a href="#">British Retail Consortium (BRC)</a>	BRC is the trade association in the UK, which we are members of.	In 2019, we joined the BRC's Better Retail Better World initiative, and are signatories of the BRC Diversity and Inclusion Charter.
<a href="#">Call to Action - End Uyghur Forced Labour</a>	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.	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.
<a href="#">Fast Forward</a>	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.	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.
<a href="#">GoodWeave</a>	GoodWeave aim to work with suppliers and factories to end child labour and forced labour.	In 2024, New Look has engaged with GoodWeave with the aim to increase knowledge regarding the use of subcontracting in RMG supply chains in Bangladesh and to document the conditions of work, including child and forced labour.
<a href="#">International Transport Workers' Federation (ITF)</a>	The International Transport Workers' Federation (ITF) is a democratic, affiliated federation recognised as the world's leading transport authority, promoting respect for trade union and human rights.	We have been working with ITF since March 2021 for their support on biannually mapping shipping vessels used by our logistics providers to ensure they are covered by an ITF-Approved Collective Bargaining Agreement. In June 2024, we signed a collaboration agreement to formalise our partnership.
<a href="#">Sedex</a>	The Sedex platform has a variety of tools and services that support human rights due diligence in value chains.	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. We are currently working to utilise Sedex data more effectively through their platform.



<a href="#">The Reassurance Network (TRN)</a>	<p>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.</p>	<p>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.</p>
<a href="#">TrusTrace</a>	<p>TrusTrace is a traceability and compliance data management platform that automates the collection and validation of real-time granular data direct from the supply chain.</p>	<p>In 2023, we partnered with TrusTrace to begin the process of strengthening and formalising our supply chain mapping process on their platform.</p>

## KEY UPDATES ON PROGRESS FOR FY23/24

As part of our continuous monitoring process, we have identified several ongoing priority areas that pose a greater risk to modern slavery. We remain committed to reporting our progress in these priority areas, with key actions highlighted in the below table.

	Potential Risk	Progress in FY23/24	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.	<ul style="list-style-type: none"> <li>• During 2023/24, we continued to work with one main agency Job&amp;Talent. A key focus for us in the procurement process was establishing the safeguards Job&amp;Talent have in place to guard against modern slavery.</li> <li>• The agency does not use overseas partners and only recruits foreign workers already residing 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.</li> <li>• The agency has committed to being a Stronger Together Business Partner and 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.</li> <li>• 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. They also need to be GLAA registered and will be subject to regular audits. These are led by the agency and monitored by New Look.</li> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• We will continue to hold regular review meetings with Job &amp; Talent to ensure our ongoing commitment to preventing modern slavery is achieved.</li> </ul>
Own Operations	Employees in own operations not aware of	<ul style="list-style-type: none"> <li>• There is a mandatory modern slavery eLearning module on the Academy, New Looks' learning platform, that was designed by the Sustainability team for all colleagues and is updated annually.</li> </ul>	<ul style="list-style-type: none"> <li>• New Look's compliance targets for mandatory completion are 95% which considers long-term sick</li> </ul>

	modern slavery indicators.	<ul style="list-style-type: none"> <li>The Sustainability Strategy and its pillars will be referenced in the new digital corporate and DC induction increasing awareness of modern slavery throughout the business. Induction training has been strengthened, including more details on value chain, sourcing countries, risk areas, modern slavery and HRDD.</li> </ul>	<p>and maternity leavers. It currently stands at 90% and steps are being taken to achieve target.</p> <ul style="list-style-type: none"> <li>A new digital induction programme is being designed for launch Q2 FY25 with an additional face-to-face experience 'Welcome to New Look' launching by the end of Q3. Both will provide the opportunity to educate colleagues around the prevalence of modern slavery, their role in being vigilant in identifying issues and advice on how to report them.</li> <li>We will update mandatory learning in line with changes in legislation on HRDD.</li> </ul>
Goods for Resale	Suppliers must ensure their labour providers meet our standards. Failure could result in a risk of forced or bonded labour situations.	<ul style="list-style-type: none"> <li>In the UK, we continue to assess all Tier 1 and Tier 2 sites against the Fast Forward programme requirements, with increasing focus on the landed warehouses and reprocessors that work with New Look product. During the previous financial year, New Look organised 14 Fast Forward audits on our UK supply chain.</li> <li>Through Fast Forward membership, our suppliers and factories in the UK can attend training sessions on the Supplier Engagement Programme (SEP) 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 increase awareness of modern slavery risks and understand the audit methodology to ensure best practice.</li> </ul>	<ul style="list-style-type: none"> <li>Continue working towards increased auditing of reprocessing sites and landed warehouses.</li> <li>Continue mapping labour providers when onboarding new manufacturing facilities.</li> </ul>
Goods for Resale	Potential for heightened risks of modern slavery going undetected if the value chain is not transparent.	<ul style="list-style-type: none"> <li>We continue to map the beyond Tier 1 supply chain, through regular updates and via the onboarding process. We also publish full visibility of our cotton, viscose and polyester supply chains down to Tier 3. We have partnered with TrusTrace to strengthen and formalise our mapping process</li> </ul>	<ul style="list-style-type: none"> <li>Continue regular mapping of all suppliers, including beyond Tier 1, with the aim to increase percentage of supply chain covered by the</li> </ul>

	<p>Risk of unauthorised subcontracting.</p>	<p>on their platform. Through this process we have seen an increase in instances of unauthorised subcontracting which we continue to monitor and mitigate through supplier training and factory visits.</p> <ul style="list-style-type: none"> <li>• We have continued to promote greater transparency and improved due diligence across our third-party brands and concessions through our Self-Assessment Questionnaire used as part of the onboarding process.</li> <li>• In addition, we have been involved in developing the Fast Forward Brand Engagement Programme (BEP) which aims to encourage smaller brands to incorporate Fast Forward requirements into their business strategy, with the view of eventually becoming full members of Fast Forward.</li> <li>• Working with ITF, we performed another health check on the vessels involved in transporting our goods which increased visibility of working conditions for seafarers within the logistics supply chain.</li> </ul>	<p>TrusTrace system on a continuous basis.</p> <ul style="list-style-type: none"> <li>• We aim to link every purchase order to its value chain by the end of FY25</li> <li>• Continue working with our third-party brand and concession partners to promote transparency of their supply chains and continuous improvement of standards.</li> <li>• Continue developing our collaboration with ITF to support transparency of conditions within the wider logistics and transport supply chain.</li> </ul>
Goods for Resale	<p>Suppliers' use of migrant workers recruited through agencies can put workers at risk of exploitation.</p> <p>Migrant workers are more susceptible to debt bondage. Refugee workers are more susceptible to forced labour.</p>	<ul style="list-style-type: none"> <li>• In FY21, we signed the Call to Action by The Coalition to End Forced Labour in the Uyghur Region – this confirmed our commitment to not knowingly sourcing any raw material or services for the manufacturing of our products that exploit people from the Uyghur Region in China. New Look continues to support this through our due diligence processes.</li> <li>• During the last financial year, we identified one facility that was potentially linked to a parent company involved in the labour use of Uyghur workers. We worked with the supplier directly on the matter, concluding that there was in fact no relationship with the identified parent company.</li> <li>• We continue to identify the use of any migrant labour as part of our risk assessment process when entering a new sourcing country.</li> </ul>	<ul style="list-style-type: none"> <li>• Continue collaboration with the Call to Action to strengthen our approach. This will be supported by our ongoing targets to increase transparency.</li> <li>• Continue mapping refugee populations across our sourcing countries.</li> <li>• Continue to explore new technologies to help in highlighting risk in this area.</li> </ul>
Goods for Resale	<p>Suppliers' failure to put HR and recruitment processes in place can lead to children being employed illegally.</p>	<ul style="list-style-type: none"> <li>• We continue to monitor the presence of young workers through our factory visits and third-party audits. We consider young workers to be more vulnerable and this is a key focus area on our assessments. We have checks in place to identify young workers and support suppliers and young workers</li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> </ul>

		<p>in cases where they are found.</p> <ul style="list-style-type: none"> <li>• New Look has engaged with GoodWeave with the aim to increase knowledge regarding the use of subcontracting in RMG supply chains in Bangladesh and to increase visibility of the conditions of work, focusing on child and forced labour should they exist.</li> </ul>	<ul style="list-style-type: none"> <li>• Continue to engage with GoodWeave following the findings of their study, understanding if there are any risks of child or forced labour in identified Bangladesh supply chain.</li> </ul>
Goods for Resale	Women workers are particularly vulnerable to exploitation.	<ul style="list-style-type: none"> <li>• Working with Sedex to integrate gender data more seamlessly into our internal reporting capabilities, helping us to make more gender informed decisions when implementing remediation and beyond audit programmes.</li> <li>• We have signed up to the ETI Community of Practice on Gender Responsive HRDD. This is a collaborative programme aimed at addressing GBVH. The purpose is to effectively address GBVH in high-risk supply chains, by applying gender responsive HRDD through collective action and capacity building.</li> </ul>	<ul style="list-style-type: none"> <li>• Continue working to upgrade our internal reporting systems to allow for gender data to be gathered more efficiently and understand the concentration of women workers in beyond Tier 1 value chains.</li> <li>• Begin engagement with the ETI Gender programme to build internal capacity and with our suppliers to address GBV in high-risk supply chains.</li> </ul>
Services and GNFR	Heightened risk of isolated working conditions in the supply chain.	<ul style="list-style-type: none"> <li>• After engaging with the International Transport Workers' Federation (ITF) in FY22-23, we have continued our collaboration in FY23-24 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.</li> <li>• In FY23-24 we have achieved; <ul style="list-style-type: none"> <li>– 90% of vessels used are covered by ITF-approved collective bargaining agreement (CBAs) or ITF-acceptable collective bargaining agreements (CBAs).</li> <li>– Regular review of vessel lists and work with third-party forwarder ensures we use only vessels covered by CBAs where possible.</li> <li>– ITF access to vessel compliance tools and data, enabling New Look to report on compliance.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Continue our ongoing collaboration with ITF, with the view to formalise our relationship by signing a cooperation agreement.</li> <li>• 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.</li> <li>• 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.</li> <li>• We will seek assurances from our logistics provider that all charter</li> </ul>

			<p>parties applicable to the vessels carrying our goods do not contravene the ability for crew changes to take place within contractual obligations.</p> <ul style="list-style-type: none"> <li>• Throughout FY24-25, we will be undertaking a review of the functions within our supply chain, including third-party relationships. Modern slavery will be included as part of this review.</li> </ul>
<p>Services and GNFR</p>	<p>Lack of visibility of our GNFR supplier operations could lead to a heightened risk of undetected modern slavery issues.</p>	<p>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 more impactful approach across our supplier base and 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"> <li>• 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.</li> <li>• By simplifying our modern slavery due diligence assessment, we have been able to increase our completion rate and engagement with our suppliers giving us greater intelligence into their awareness of modern slavery and the practices within their company.</li> <li>• We have developed a self-scoring assessment leading to less subjective scoring – this is allowing us to assess a greater number of suppliers than ever before. The questions asked through this assessment have been reviewed by ITF.</li> <li>• We have continued to ensure all new contracts include a modern slavery clause with our own standard contract's, purchase order terms and conditions updated to incorporate this.</li> </ul>	<ul style="list-style-type: none"> <li>• Our focus for FY25 will be to continue reviewing our existing supplier base, using our screening process for new suppliers and assessing their approaches to modern slavery.</li> <li>• We are establishing insightful, simplified reporting for our internal stakeholders providing them with key data on the level of modern slavery awareness across suppliers within their areas of responsibility.</li> <li>• 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.</li> </ul>

<p>Our Partners</p>	<p>Failure by our partners to comply to the Modern Slavery Act, leading to heightened risk of modern slavery arising within their business operations.</p>	<ul style="list-style-type: none"> <li>• We experienced a delay to our e-Learning module being fully developed. This is now complete and we will identify where it is appropriate to issue to support the development of our partners.</li> <li>• We have continued to roll 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.</li> <li>• Modern slavery and human trafficking risk assessment is included within the quarterly business review meetings for brands and concessions.</li> <li>• With Stronger Together, we have been involved in the development of a brand associate option for the Fast Forward programme, tailored for UK small and medium-sized brands with a turnover under £36 million. A unique ethical labour standards improvement initiative designed to provide a step-by-step journey to enhance knowledge through an online education programme and collaboration with peer brands.</li> <li>• New look has committed to being part of a learning exchange, hosted by The Industry We Want (TIWW), with the purpose of creating a level playing field for Human Rights Environmental Due Diligence (HREDD) and establishing a common framework for retailers selling third-party brands.</li> </ul>	<ul style="list-style-type: none"> <li>• Update our concession manual to include latest business policies and situational action plans.</li> <li>• Continue to roll out our SAQ to all third-party partnerships, brands and concessions.</li> <li>• Implementation and roll out to partners of the e-learning module as and where it is identified as a requirement.</li> <li>• Engage with our brand and concession partners on the brand associate programme with Fast Forward to raise awareness of modern slavery within smaller brands not required to report on their activities.</li> <li>• Continue our involvement in TIWW learning exchange, to create a framework for retailers selling third-party brands.</li> </ul>
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## **NEXT STEPS**

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 amending our processes to be aligned with a Human Rights Due Diligence 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 advocate for sector collaboration and regulation.

On a quarterly basis, we hold a modern slavery working group which is a cross-business forum, reporting into our ESG steering group. Next year, the group has agreed that we will prioritise the following areas:

- To continue moving 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), OECD Guidelines for Responsible Business Conduct and new regulations.
- 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 continue to focus on extending auditing of reprocessing sites and warehouses across our UK sites.
- To embed gender responsive HRDD within our value chain, through collective action and capacity building, supported by the ETI Community of Practice on Gender Responsive HRDD.
- As we increase our visibility of our beyond Tier 1 value chain through more robust data gathering methods, we acknowledge there may be areas where an alternative approach may be required to identify, address and mitigate risks. These will be incorporated into our evolving materiality assessment and due diligence processes through a collaborative approach.
- We will continue to seek guidance and support from expert organisations on handling any modern slavery cases, and any emerging risks that may be identified through our materiality assessment.

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 on 25 September 2024.



Helen Connolly  
Chief Executive Officer  
New Look Retail Holdings Limited