## **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 modern slavery and human trafficking. Therefore, we continue to do all we can to eliminate it within our direct and indirect operations. We also remain committed to developing our policies, practices and ways of working to deal with any evolving modern slavery or human rights risks.

### **Highlights from FY2425**

- As a business, we continue to transition from a compliance-led approach to a Human Rights Due Diligence (HRDD) approach, in line with the UN Guiding Principles on Business and Human Rights (UNGPs), the OECD Due Diligence Guidance for Responsible Business Conduct and emerging Human Rights Due Diligence (HRDD) legislation. In September 2024, we hired a Human Rights Sustainability Manager whose key responsibility is the oversight of this process.
- In 2024, we continued our partnership with TrusTrace to strengthen and formalise our supply chain mapping process. As a result, 100% of core suppliers are now listed on the platform, with visibility of our Beyond Tier 1 facilities having increased by 55%.
- In August 2024, New Look signed a Memorandum of Understanding (MoU) with the International Transport Workers' Federation (ITF). Under this agreement, New Look will carry out HRDD in consultation with the ITF across its directly operated and third-party logistics providers, aligning with UN Guiding Principles, ILO standards, and OECD guidelines.
- We have engaged with the Ethical Trading Initiative (ETI) Community of Practice on Gender-Responsive HRDD; a collaborative programme focused on addressing gender-based violence and harassment (GBVH) through collective action. The initiative supports the application of gender-responsive HRDD by building capacity among suppliers and factories. Insights and learnings from this programme will be applied throughout the upcoming financial year.
- In 2024, New Look collaborated with GoodWeave to contribute to growing industry knowledge and exposure 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. Whilst no indicators have been found to date through this programme, New Look has the policies and processes in place to support remediation should it be necessary.
- At the end of 2024, New Look began a worker voice project with The Reassurance Network (TRN) aimed at improving transparency around working
  conditions, strengthening of grievance mechanisms and enabling integration of worker feedback into HRDD practices. To date TRN have visited
  six factories across India, China and Egypt, with findings from these are being reviewed to inform our risk assessment and practices going
  forward.

#### **OUR BUSINESS**

### **Own operations**

Founded in 1969, New Look is a leading omnichannel broad-appeal fashion brand, dedicated to creating a feel-good shopping experience. 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 graphic below provides an overview of New Look's operations with the data accurate as of July 2025.



7,201

**EMPLOYEES** 

Total number of directly employed colleagues across our own operations



353

**TIER 1 FACTORIES** 



992

#### **AGENCY WORKERS**

Total number of agency workers employed in our DC In Staffordshire & Support Centres in London and Weymouth



910

#### **BEYOND TIER 1 FACTORIES**

Based on the ongoing onboarding of suppliers onto our digital platform TrusTrace



346

**UK STORES** 



170,000

#### **WORKERS IN OUR TIER 1 FACTORIES**

Includes permanent employees, agency workers and temporary workers. 55% of these workers are female.



**SOURCING COUNTRIES** 

At Tier 1 level

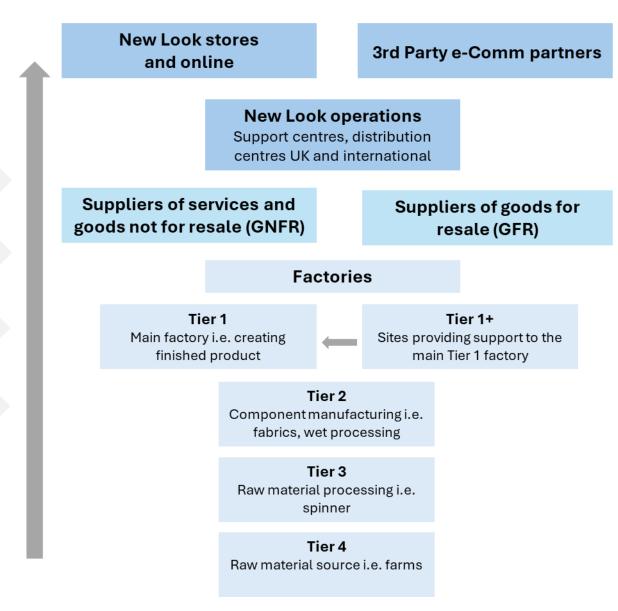


82%

**PRODUCTS** 

Supplied by our top 10 suppliers

Labour providers and recruitment agencies



#### **POLICIES AND GOVERNANCE**

We take a zero-tolerance approach to modern slavery across all areas of our business. Our <u>Anti-Slavery and Human Trafficking Policy</u> 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. through agencies) further down our Goods for Resale (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 the contractual terms and conditions of trade detailed in our supplier manual, suppliers commit to the below policies. These are updated annually or in reaction to changing business operations or sourcing contexts. Our suppliers are required to distribute them within 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; and
- Xinjiang Uyghur Autonomous Region (Uyghur Region) Sourcing Policy.

In addition, we also require our suppliers to adhere to New Look's:

- · Speak Up Whistleblowing Policy; and
- Responsible Entry & Exit Policy.

#### **HUMAN RIGHTS DUE DILIGENCE**

## Risk prioritisation

We recognise that violations, including modern slavery and forced labour, may affect our own operations, those of our business partners and those within our respective value chains. Therefore, we continually monitor the Environmental, Social and Governance (ESG) risks pertinent to New Look's business model to prioritise our strategic focus and determine our ability to influence change.

### Saliency assessment

In 2024, we revised our saliency assessment by combining proprietary and open-source data, including TRN worker feedback, industry indices, and New Look's latest audit/visit figures. We focused on the top sourcing countries—Bangladesh, India, Cambodia, China, Türkiye, and the UK—and identified key social and environmental risks. Risks were mapped and scored

# Case study 2: Supporting Bangladesh factory following civil unrest

One of New Look's factories in Bangladesh closed temporarily due to the unrest following the riots in the summer of 2024. Once it reopened, it operated excessive overtime to make up for lost production hours.

Under ordinary circumstances, non-compliances of this nature would cause suspension of the facility's low risk/ non-conformances status until improvement was made. However, given the exceptional situation in Bangladesh at the time, we did not impose any penalties and instead worked with the factory very closely to monitor and gradually reduce overtime.

This collaborative approach ensured we mitigated any potential risks of exploitation while at the same time allowing the factory to recuperate from the disruptions earlier in the year.

# Case Study 1: Addressing Unauthorised Subcontracting and Irregular Employment in India

In 2023, TRN conducted unannounced visits to a New Look factory in India, uncovering unauthorised subcontracting for ancillary processes, missing worker documentation, and lack of payroll records for piece rate workers. To address these issues, we partnered with TRN on a supplier-funded factory improvement programme in 2024. This included capacity building across all supplier sites, focusing on health and safety, grievance mechanisms, and regular employment. Additionally, a new factory set-up process was implemented, and ancillary processes were moved in-house.

based on scale, scope, and likelihood, then adjusted using commercial criteria to guide prioritisation and mitigation. We aim to fully align this methodology with New Look's Corporate Risk Register for consistency across the business.

Please see the sections below and **Case studies 1 and 2** for details of the risks identified in the last iteration of the saliency assessment, including the progress on the mitigation and prevention activities taken thus far and the objectives for FY2526.

#### Limitations

Many of the key risks identified in our saliency assessment are found in areas of informal employment and beyond our Tier 1 factories. While these parts of the supply chain present unique challenges, we are actively expanding our visibility and understanding of them. Through ongoing collaboration with our suppliers and the use of tools like TrusTrace, we are steadily mapping these extended networks. In the meantime, our due diligence efforts remain focused on ensuring that, where issues do arise, workers receive timely and appropriate remediation. This approach reflects our commitment to responsible sourcing and continuous improvement across all tiers of our supply chain.

### Whistleblowing procedures

We have partnered with Navex to provide a 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, our Human Rights Sustainability Manager acts as a modern slavery officer for the business.

We recognise that it is essential for workers within our supply chain to also have access to remedy and adequate channels to raise grievances. Ideally, traditional workplace channels are sufficient but when these fail, other independent avenues need to be provided. Therefore, workers can raise concerns directly via local representatives of TRN. In addition, we have facilitated access to whistleblowing helplines and anonymous grievance mechanisms in several strategic sourcing countries:

## Case Study 3: Skilled Worker Management in Leicester, UK

In 2024, our whistleblowing mechanism revealed that a Leicester facility failed to meet its responsibilities towards a migrant worker on a Skilled Worker visa. Issues included inadequate recruitment, differing employment terms, and non-payment of dues. New Look and TRN investigated, ensuring the worker received all owed payments. TRN initiated a factory improvement programme to better manage migrant workers and improve working conditions. New Look continues to oversee the site's ethical commitments. The improvement programme is ongoing, and the worker has been compensated. Learnings from this case will be used to inform future protocols.

- Bangladesh and Pakistan through the International Accord;
- Bangladesh through our collaboration with ACT;
- the UK as part of the Fast Forward programme, as well as a community outreach programme in Leicester; and
- Türkiye through our strategic supplier's own whistleblowing line.

In the last financial year, the majority of issues logged through the above whistleblowing channels have primarily been individual grievances rather than highlighting any indicators of modern slavery or human trafficking. This being said, **Case study 3** highlights remediation undertaken after receiving information of potential modern slavery indicators.

### Internal risk and compliance

ESG is one of the areas within New Look's Corporate Risk Register and ESG infringements are considered a principal risk in our annual report. This ensures that ESG risks are regularly reviewed by senior management. It also 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.

The Head of Operational Compliance has an agile approach to planning in reaction to any increase in risk or incidents that may occur. The risk of modern slavery is audited separately but also as part of other audits relating to, amongst others, recruitment, the use of temporary workers, distribution centre operations, sourcing, ESG and organisational ethics (e.g. whistleblowing). The Compliance Team also provide ongoing input to the HRDD working group.

## **Training**

During the last financial year, we updated the internal Modern Slavery Compliance training by integrating it into a new online *Essentials Compliance* module. The course is now tailored into three distinct versions, Support Centre, Distribution Centre, and Retail, ensuring that while the core compliance elements are consistent, each version is relevant to its specific business area. We've also incorporated real-life scenarios to enhance understanding and practical application.

For our Retail and Distribution Centre colleagues, we have introduced a fixed compliance period (January to March), replacing the previous approach based on individual start dates. This change allows for a more focused training window, with time specifically allocated for compliance learning. As a result, we've seen a significant improvement in both engagement and completion rates, achieving a 95% completion rate to date.

In addition, for suppliers operating within the UK, whether providing ancillary services or managing UK-based warehousing, they are required to participate in Fast Forward's Supplier Engagement Programme, which offers continuous support and training opportunities, including updates on legislative training.

## **ACTIVITIES UNDERTAKEN DURING FY2425**

# **Own Operations**

We have support centres located in London and Weymouth, with one distribution centre in Staffordshire, which distributed all stock to our stores, wholesale partners and fulfilled global E-commerce orders.

Potential risk	Progress in FY24/25	Objectives for FY25/26
Labour providers not adhering to the requirements set out in our policies	Within the DC we continued to work with one main agency, Job & Talent. They do not use overseas partners and only recruit 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.	We plan to phase out our use of agency providers within DC operations during the next financial year, as a way of streamlining our recruitment processes.

# Goods for Resale (GFR)

Salient risk	Geographical area	Details		Progress in FY24/25		Objectives for FY25/26
Exploitative working conditions in the informal sector	India, Bangladesh, Cambodia	Workers employed in the informal sector are not covered by the same protections of the labour laws as the worker employed formally. They are often from vulnerable groups (migrants, refugees, women, children) and do not have job security.	•	We have worked closely with Sedex to widen the amount of disaggregated data gathered around vulnerable worker groups, with 80% of Tier 1 factories currently sharing this information with us.  We collaborated with GoodWeave to increase knowledge regarding the use of subcontracting in RMG supply chains in Bangladesh, subsequently highlighting where there might be increased risks to vulnerable groups. To date, visits have taken place at two Tier 1 sites and three Tier 2 sites.	•	Work with the remaining 20% of Tier 1 factories to onboard onto the Sedex platform, to provide us with greater visibility of worker demographics.  As efforts to reduce environmental impacts intensify, we recognise the importance of adopting a Just Transition approach - one that ensures the shift is fair and inclusive, particularly for workers and communities most affected by the change
Lack of freedom of association and/or freedom of association is not respected	Global	Restrictive laws, exploitative industry practices, limited awareness, and union suppression create significant barriers to workers' freedom of association and collective bargaining.	•	We continued our collaboration with ACT, working towards implementation of a collective bargaining agreement within the Cambodia supply chain.  We have worked with TRN to create a programme focused on understanding freedom of association practices in key sourcing countries. The aim of the project is to understand effectiveness of grievance mechanisms and worker committees, as well	•	Integrate insights from the Worker Voice project into future risk assessments and remediation strategies across the supply chain, with the objective of fostering more effective and sustainable improvements in factory management systems, particularly in relation to grievance mechanisms.

				as to facilitate an environment of safety for raising grievances.		
Gender discrimination, gender-based violence and harassment (GBVH)	Global	Prevalence of GBVH is high despite initiatives by the authorities and other nongovernmental actors. Even where dedicated complaints mechanisms have been mandated by law, their implementation is inadequate, Women also continue to be underrepresented in leadership positions and higher education, despite their high rate of participation in the labour force.	•	We have engaged with the ETI Community of Practice on Gender-Responsive HRDD, a collaborative programme focused on addressing GBVH through collective action. The initiative supports the application of gender-responsive HRDD by building capacity among suppliers and factories.	•	Insights gained through the ETI programme will be formalised into an action plan focused on improving our gender-responsive HRDD practices, creating the basis for our work in this area going forward.
Lack of supply chain transparency and working practices in lower tiers	India, Morocco, Bangladesh, China, UK	The widespread use of subcontracting, due to country-specific working practices, increases the complexity of monitoring labour practices, raising the likelihood of unethical treatment and forced labour.	•	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 re-processors that work with New Look products.  In 2024, we continued our partnership with TrusTrace to strengthen and formalise our supply chain mapping process on their platform.  We continue to work closely with TRN to perform semi-announced or unannounced visits across key sourcing countries. Part of these visits will assess supply chain mapping matches with details provided to us by the supplier and/or factory.  As above, we have partnered with GoodWeave to assess subcontracting risks in the RMG sector.	•	As part of our forward-looking objectives, we will closely monitor emerging circular supply chains to identify and assess potential risks, particularly those related to the lack of transparency in working conditions. Following several visits to Egypt by TRN, a number of common industrywide labour practices have been identified. In response, we will strengthen our due diligence efforts to gain a deeper understanding of systemic issues that may negatively impact workers.
Forced labour in Xinjiang	China (Xinjiang)	Workers may be coerced into labour in harsh conditions, often without consent.	•	We have continued working in alignment with the 'Call to Action on Human Rights Abuses in the Uyghur Region'.  As part of our partnership with TrusTrace we have increased visibility through full supply chain mapping and continue to monitor that sites have no links to forced labour practices.	•	We will continue enhanced supply chain mapping and HRDD for facilities located in China, to ensure no direct or indirect links to forced labour practices.

## 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 1,504 suppliers using a category management methodology.

We have implemented a structured screening process for all new Goods Not For Resale (GNFR) suppliers to assess their awareness of, and exposure to, modern slavery risks. We remain actively engaged with our existing suppliers to drive a more effective and wide-reaching approach across our supply base. Our established procedures include a streamlined self-assessment questionnaire designed to encourage supplier participation and enhance visibility into their modern slavery policies and practices. Additionally, all new supplier contracts include specific modern slavery clauses as a standard part of the onboarding process.

Potential risk	Progress in FY24/25	Objectives for FY25/26
Heightened risk of isolated working conditions in the supply chain, leading to greater risk of worker exploitation.	In August 2024, New Look signed an MoU with the ITF. Under this agreement,     New Look will carry out enhanced HRDD in consultation with the ITF across its     directly operated and third-partly logistics providers. Key provisions include     advancing freedom of association permitting ITF-affiliated unions access to     logistics facilities, conducting joint training sessions for workers and suppliers,     and establishing collective-bargaining-based remediation mechanisms.	We will engage all relevant internal stakeholders to develop a comprehensive action plan to advance HRDD across our logistics supply chain.
Lack of visibility of our GNFR supplier operations	We have launched our supplier eLearn and use this to support improving awareness of modern slavery for suppliers who score as high risk through our due diligence processes.	<ul> <li>We will continue using our established process for new suppliers to screen our existing supplier base and assessing their approaches to modern slavery.</li> <li>We will continue to provide reporting for internal stakeholders on awareness levels of modern slavery within suppliers.</li> </ul>

#### Global Partnerships, Wholesale and Marketplace

We continue to trade an established third-party business with our key wholesale partners ASOS and Very in the UK and ROI, while our European marketplace with Zalando is now in its third year and continues to grow. We remain trading in eight European countries and fulfilling customer orders via a German warehouse operation. All our partners have established modern slavery policies and processes in place which take into consideration appropriate legislation related to modern slavery. Every signed agreement between New Look and our partners includes our specific requirements related to modern slavery. We work collaboratively with them to enhance transparency and improve visibility across our supply chains.

During the previous financial year, our freight partner EV Cargo, supported with routing stock to several of our wholesale partners and marketplaces via their warehouse operations in Germany. Whilst our current partners have their own sustainability agendas, our own due diligence approach with these logistics providers will be strengthened as we continue efforts as part of our collaboration with ITF to increase visibility of conditions in our logistics supply chain. 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 women, temporary, migrant or agency labour.

#### Our brands and concessions

Potential risk	Progress in FY24/25	Objectives for FY25/26
Lack of transparency form our brands and concessions partners	<ul> <li>We have continued to promote greater transparency and improved due diligence across our existing third-party brands and concessions by updating our online ESG Questionnaire, as well as using this as part of the onboarding process. To date, 95% of all partners have completed the updated questionnaire and sent us the associated supporting evidence.</li> <li>New Look continued our commitment to being part of the 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> <li>Continue to roll out our ESG questionnaire to all remaining and new third-party brands and concessions.</li> <li>Continue our involvement in TIWW learning exchange, to create a framework for retailers selling third-party brands and concessions.</li> </ul>

#### **MONITORING & EVALUATION**

We operate a continuous improvement model across our supply chain, underpinned by regular monitoring and evaluation. This includes independent third-party audits, site visits conducted by TRN, and targeted programmes designed to drive meaningful, long-term change.

We work collaboratively with our suppliers and factories on remediation efforts, providing tailored improvement plans and clear recommendations for issue resolution. Progress is closely tracked over defined timeframes, determined by the severity of identified issues. High-risk sites are prioritised for more frequent and earlier follow-up visits to ensure the effective implementation and verification of corrective actions.

Looking ahead, we remain committed to strengthening our HRDD practices and mitigating risks to individuals within our supply network. This includes the adoption of recognised frameworks and the implementation of context-specific, on-the-ground initiatives where appropriate. As part of our continued improvement efforts, we have revised our site visit protocols in collaboration with TRN and are in the process of integrating third-party audit data into our internal systems. This integration will enhance the quality and consistency of our data collection, supporting both our sustainability objectives and alignment with evolving regulatory and reporting requirements.

On a quarterly basis, we hold an HRDD (previously Modern Slavery) working group which is a cross-business forum reporting into our ESG Steering Group. It provides an opportunity to reflect on the human rights efforts undertaken by all departments and agree on areas of priority. In FY2425, the working group expanded its remit beyond modern slavery to cover all human rights areas and therefore ensure the HRDD is embedded across all functions within New Look.

# **PARTNERSHIPS**

Partner	Overview	New Look's involvement
Better Cotton Initiative	Global sustainability initiative for cotton promoting,	100% of our cotton is sourced as more responsible cotton - BCI, organic or
(BCI)	amongst others, improved working conditions and a	recycled
	higher standard of living for farmers	
British Retail Consortium	Trade association for UK retail businesses running	We joined BRC's Better Retail Better World initiative in 2019
(BRC)	sustainability initiatives and setting industry standards	We are signatories to the BRC Diversity and Inclusion Charter
Call to Action – End	Coalition of civil society organisations and trade unions	We are mapping our value chain to ensure we are not knowingly supporting the
Uyghur Forced Labour	united to end state-sponsored forced labour and other	abuse of Uyghur workers whether directly or indirectly
	egregious human rights abuses against people from the	
	Xinjiang Uyghur Autonomous Region (Uyghur Region) in	
	China	
Ethical Trading Initiative	Alliance of trade unions, NGOs and businesses, working	Member since September 2003
(ETI)	together with key stakeholders to promote practical	We participate in the Gender Responsive Action Community (GRACE) which
	solutions to end the abuse of human rights at work	supports companies to identify, prevent, mitigate and account for the risks of
		GBVH in their supply chains, using a gender-responsive HRDD approach
GoodWeave	International NGO working to stop child labour in global	• In 2024, we participated in a project aimed at increasing knowledge of the use of
	supply chains through a market-based system and holistic	subcontracting in RMG supply chains in Bangladesh and documenting the
	approach	conditions of work, including child and forced labour
		In 2025, we nominated three of our factories in Bangladesh for a trial of
		GoodWeave's rapid forced labour assessment methodology
International Transport	A democratic, affiliate-led federation recognised as the	In 2024, we signed a MoU to formalise our partnership with ITF, aiming to
Workers' Federation (ITF)	world's leading transport authority, promoting respect for	strengthen our due diligence efforts in collaboration with our logistics providers
	trade union and human rights	
Sedex	Global technology company that specialises in data,	We utilise Sedex risk analysis tools as part of our saliency assessment
	insights and professional services to empower supply	We are also currently working with Sedex on a streamlined data solution to
	chain sustainability	facilitate our social reporting going forward
The Reassurance	Close-knit team of specialists located in major sourcing	We partnered with TRN in 2019 and have been utilising their on-the-ground-
Network (TRN)	regions helping manufacturers, suppliers and agents to	expertise to support us in our key sourcing countries with factory visits, capacity-
	understand and improve working conditions and factory	building and targeted projects
	performance	
TrusTrace	TrusTrace is a traceability and compliance data	In 2023, we partnered with TrusTrace to strengthen and formalise our supply
	management platform that automates the collection and	chain mapping process
	validation of real-time granular data direct from the supply	As of July 2025, 100% of our suppliers have been onboarded onto the platform
	chain	with 77% of our Tier 1 facilities fully mapped

New Look's Modern Slavery Statement was prepared by our HRDD working group and approved by the board of directors of New Look Retail Holdings Limited on 30<sup>th</sup> September 2025.

Helen Connolly

**Chief Executive Officer** 

New Look Retail Holdings Limited