

MODERN SLAVERY STATEMENT

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

We recognise that modern slavery is a global issue and that no economy or industry is immune. Therefore, we are committed to doing all that we can to ensure that there is no modern slavery or human trafficking in our supply chains or any part of our business.

This is our third annual statement which documents our ongoing efforts to prevent modern slavery, our progress made to the end of the financial year (FY19), and our future plans.

WHO WE ARE

New Look opened its first store in 1969 and is now a leading fashion brand. In 2019, we completed a financial restructuring to reduce New Look Group's debt, which resulted in a change of ownership structure. The New Look Group is now majority owned by senior secured creditors, with management holding a 5% stake. Within the New Look group, New Look Retailers Limited is the main employer and trading entity.

THE BUSINESS IN NUMBERS



£1.2BN

FY19 REVENUE

Revenue £1.24bn for year to March 2019 for continuing operations*

*Continuing operations comprises results from the UK, ROI, Ecommerce, 3PE, Franchise, France and Poland



15,500

EMPLOYEES

c.15,500 employees globally



2,124

PEOPLE

Total number of agency workers employed FY19 in our UK DC and UK stores



574

STORES WORLDWIDE

574 including franchise (568 owned)



66

COUNTRIES

We deliver to 66 countries through newlook.com



80%

PRODUCTS

c.80% of products are supplied by our top 20 Suppliers

OUR SUPPLY CHAIN MODEL

The below diagram illustrates our supply chain, the different areas where people are employed and our approach to identifying risks. Slavery, servitude, forced and bonded labour, and human trafficking are issues of global concern, that potentially affect all areas of our business, and those working across our supply chain if the right due diligence is not in place.



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Our own operations: Stores, support centres and distribution centres

During FY19 we owned over 500 stores in the UK, Republic of Ireland, France and Poland.

Due to the New Look Group's financial difficulties it was no longer able to continue to support the business in China, which has led to the exit from the market and closure of all the stores at the end of December 2018.

During FY19 we had support centres located in London, Weymouth, Paris and Warsaw. We also operated our distribution centre in Staffordshire, which distributed stock to our stores, franchise and wholesale partners and fulfilled global E-commerce orders.

We employed approximately 15,500 people and also engaged with agency workers. During FY19 we employed a total of 1,669 agency colleagues in our UK distribution centres, and a further 455 in our UK stores.

Our partnerships: Franchise stores and 3rd party e-commerce

We continue to expand our E-commerce partners, like ASOS and Zalando, and currently trade with over 15 brands globally. Our franchise partners operate 6 stores, and employ their own staff. In FY19 we stopped working with our largest franchise partner in the Middle East.

Goods for resale suppliers

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

Many people are involved in supplying our products before reaching our distribution centres. To meet customers' needs, we have a global supply chain of 180 suppliers and a network of over 600 factories across 25 countries, involving approximately 266,000 employees¹. We map and describe our goods for resale supply chain (see below).



¹ Worker number based on information from audit reports of Tier 1 sites only. Factory number as of 21 March 2019.

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Services and goods not for resale

These are services and goods we buy because they are needed for our business to operate, and not sold to our customers.

Non-stock items and services include warehouse management, garment processing, outsourced customer deliveries, logistics, IT, utilities, cleaning and customer care. We procure these services and goods from more than 1,900 suppliers, who we manage using a category management methodology. Of course, we expect and insist that our suppliers look after their workers, but we also believe that, as a major customer of some suppliers, we have a certain responsibility to promote and protect the welfare of those individuals too. We do this through sharing knowledge and risk-awareness with our suppliers, and making clear to them what our requirements are.

OUR POLICIES & GOVERNANCE

We have a zero-tolerance approach to modern slavery across all areas of our business. In September 2016, we published our Anti-Slavery and Human Trafficking Policy, which outlines our commitment to act ethically – not only to prevent modern slavery within our business and supply chains, but also in outsourced employment (agencies) further down the GFR supply chain.

All directors are responsible for ensuring that the policy follows legal and ethical duties – and that all employees adhere to it too. Heads of departments have primary accountability for implementing the policy in their specific areas, and suppliers are responsible for upholding the policy in their business and onward supply chain.

We act to ensure that our suppliers, contractors, partners and businesses further down our supply chains, are aware of and understand their obligations under our policy.

We have a Modern Slavery Working Group and representatives from all areas of the business leading the work on this agenda.

A number of our other policies support our commitment in this area:

- Our Equal Opportunities and Dignity at Work policies outline the ways we look to eliminate discrimination and keep our workplaces free from any form of bullying or harassment.
- Our Ethical Aims reflect our commitment to acting ethically (and with integrity) in all of our wider business relationships.

- Our Code of Business Ethics explains the ethical standards that we require from our employees and those who we work with. We continuously develop and revise the code to deal with new risk areas as the industry evolves.
- Our Whistleblowing Policy encourages employees to report any wrongdoing and provides a clear procedure for raising concerns. We extend the principle of whistleblowing to our supply chains too, and we continue to explore ways to make our whistleblowing facilities more accessible and co-ordinated across our whole business.

As part of our supplier manual and trading and compliance standards, suppliers also commit to:

- Refugee policy
- Child labour procedures
- A ban on Uzbek and Turkmen cotton

We understand the need to drive initiatives beyond our business. It is this drive that allows us to identify potential risks from unauthorised subcontractors, the exploitation of a growing migrant workforce or any other sectors of vulnerable labour.

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

Collaborative partnerships

We are committed to tackling human rights issues directly. We have a dedicated team who instil Corporate Social Responsibility (CSR) across the whole business. The CSR team work closely with our buyers and goods for resale suppliers to monitor purchasing practices. They also help teams to understand the impact on people in our supply chain.

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

- Governments
- The private sector
- Civil society
- Trade unions
- Other stakeholders

During FY19 we forged three new strategic partnerships:

- Anti-Slavery International – to support us in the progression of screening, training and due diligence processes
- The Reassurance Network (TRN) – a team of on-the-ground specialists who support us in the delivery of our CSR strategy
- Apparel and General Merchandise Public and Private Protocol ([Textiles Protocol](#)) – to protect vulnerable and exploited workers in the UK

We are a member of the Ethical Trading Initiative (ETI), an organisation that brings corporate, trade union and NGOs together to tackle ethical issues. We adopted the ETI's Base Code of Conduct, which is based on the standards of the International Labour Organisation (ILO) as the foundation of our Ethical Aims. Under those aims, employment should be freely chosen, forced bonded or child labour cannot be used.

As an active member of the ETI, we contribute and work closely with other members in working groups to share information and projects. To underpin our collaborative approach, in March 2019, we signed The ASOS & House of Lords Modern Slavery Pledge to tackle modern slavery within the supply chain. This was presented in an event co-hosted by ASOS and Baroness Young of Hornsey OBE.

We are also members of the Business Social Compliance Initiative (BSCI). We use their supply chain management system as a preferred choice for our factories to follow.

BSCI implements principle international labour standards protecting worker's rights, such as: International Labour Organisation (ILO) conventions and declarations, and the United Nations (UN) Guiding Principles on Business and Human Rights and guidelines for multinational enterprises of the organisation for Economic Co-operation and Development (OECD).

RISK PRIORITISATION & MANAGEMENT

We have a responsibility towards every individual who contributes to our business – whether it is our employees and temporary staff, or as a leader supporting our franchise partners. When it comes to our suppliers, we also need to insist on appropriate standards being upheld.

We recognise that modern slavery may affect our people and supply chains more where the following risk factors are present:

- Migrant labour is used.
- Vulnerable workers are prevalent especially in certain countries i.e. refugees, young workers, child labour.
- Temporary or agency workers are needed (who may not be subject to the right due diligence checks through their recruitment agencies and labour providers).
- Lower cost materials or services are being offered by suppliers.

Summary

Our core responsibility is to have visibility of the groups that are at greater risk of modern slavery, and to ensure that they are protected. Therefore, we have focused our efforts according to the aforementioned risk factors.

Most risk lies in the outsourced employment (agencies) across our supply chains and further down the goods for resale supply chain – where we have less control and visibility of workers and employment practices. Consequently, we have prioritised mapping our supply chain and identifying areas where workers are engaged through agencies.

Our risk prioritisation and management is constantly evolving. In our goods for resale supply chain we use baseline risk assessment (for our key sourcing countries) as well as our suppliers' factories' profiles to make more informed decisions.

See our progress at the end of our statement for further details.

OUR DUE DILIGENCE MECHANISMS

Our own operations

Without the appropriate checks and procedures, we recognise that modern slavery could occur in our own recruitment process. Therefore, when recruiting our staff, we ensure that a robust selection process takes place – which is managed by a trained recruitment team. It is important to us that all applicants and potential hires apply for opportunities at 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 also improved our due diligence mechanisms by strengthening our direct hiring model. Approximately 80% of our employees are employed without the assistance of recruitment agencies. Furthermore, we continuously review our agency partnerships, where external support is required in the hiring process, and only work with employment agencies that have the same ethical standards as our own.

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

Our goods for resale supply chain

We monitor our Tier 1 goods for resale supply chain through independent third party audits and specialised programmes. Our internal CSR team and partner organisation, TRN, also perform audits and encourage transparency in the factories we use. While we are mindful of the limitations of audits – they only provide a snapshot in time and do not highlight the

entire issue – they illustrate the important input for risk assessment (which is combined with partner reports and market studies to help us to understand the risks). We have partnered with TRN to support us with the implementation of our CSR strategy.

To ensure that new goods for resale suppliers go through a staged process of approvals – which includes ethical considerations at the same level as other commercial requirements – we use an online on-boarding process for new suppliers.

As a founding member of the Fast Forward programme, we use their audit methodology to assess our UK sites and to evaluate modern slavery risks through a series of indicators. This year, we became signatories of the Apparel and Generic Merchandise Public and Private Protocol (Textiles Protocol) – which was announced by the UK Prime Minister's office in November 2018 as a partnership between retailers and enforcement bodies. This protocol is important to eradicating labour abuse in the UK textile industry, and we will continue to play our part.

We are also part of the ACT initiative (Action, Collaboration, Transformation), a ground-breaking agreement between global brands, retailers and trade unions. The ACT initiative aim to transform the garment and textile industry, and achieve living wages for workers, through industry-wide collective bargaining linked to purchasing practices.

To promote a more transparent supply chain, we started publishing our Tier 1 factory list on our group website in September 2017 – and we have been updating it biannually since then. In 2018, we were ranked amongst the 30% highest scorers out of the 150 brands in the Fashion Transparency Index.

Our services and goods not for resale supply chain

During FY19, we took significant learning from our suppliers' screening process, which provided details of our services and goods not for resale (GNFR). We experienced some challenges with suppliers in terms of engagement to enable us to assess both the level of awareness of modern slavery across our supply chain, and practices adopted to mitigate risk. Therefore, we engaged with Anti-Slavery International to review our approach.

Anti-Slavery International supported our procurement, corporate governance and supply chain teams with training sessions that redefined our screening process for new suppliers. It also developed ways of assessing the inherent risk within our existing supply base. This assessment approach now includes an initial basic screening or a deeper due diligence for suppliers where a risk might be present – a decision based upon factors in an objective risk scoring methodology. Some of these factors include: the country of origin; goods or services being supplied; the prevalence of modern slavery risk in the category or subcategory of the spend; and the percentages of temporary/migrant/ contract/agency workers.

An updated screening process is now in place for all new suppliers, and we are revisiting our existing GNFR supply base by working through our higher risk commodities first. This includes: cleaning services; road transportation; and other categories with high labour services. Our largest temporary resource provider, which provides support to our distribution centre, was also subject to a risk assessment by our Internal Audit team – to ensure that all necessary controls were in place.

We will continue with this program to ensure that we have modern slavery clauses within our key contracts. This will continue to be our focus in FY20. In addition, we will work with our industry peers, Anti-Slavery International and other influential parties, to improve the channels of communication that concern modern slavery.

Our third party e-commerce and franchise partners

In 2017, we introduced our modern slavery approach to our global partners through our 'Brand Days'. Here, we refreshed their understanding of our policies and expected standards. Additionally, we developed an E-learning module for our International Partners. For our other franchise partners, we ran a training session on modern slavery in May 2019 Brand Day. Following this, we will introduce an E-learning module on modern slavery – a module that we will share with all new third-party E-commerce partners.

Internal audit and assurance

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

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

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

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

Access to remedy

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

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

In the UK, our sites must enrol in a hotline programme. Each factory manufacturing or processing New Look goods must have posters that feature the hotline programme's contact details. This allows workers to call should they need to. Additionally, we distribute business cards highlighting contact details for the hotline programme and New Look's CSR team. The new partnership with Textiles Protocol in the UK means that we will continue to work with other brands and enforcement agencies to address labour exploitation in the UK.

In FY19, we logged nine reports of alleged issues raised by factory workers in the UK. The nature of issues encountered this year included unauthorised

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subcontracting, alleged discrimination, unfair dismissals, concerns about working hours, issues relating to workers' pay, holiday and overtime pay, and concerns about working conditions. We addressed each report on a case-by-case basis, and tailored remediation plans that would protect workers against repercussion. We received no calls to our UK distribution centre whistleblowing helpline.

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

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

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

Training

We provide training to all in-house employees on the risks and possible indicators of modern slavery and human trafficking. We also encourage employee vigilance and willingness to challenge a situation.

Through our mandatory E-learning programme, we aim to help people understand how to work together, internally and externally, if they encounter something that raises concerns. Managers continue to report to our HR department to ensure that training is complete.

In the UK, we implement Fast Forward in every factory that we source from – this means that every factory has training sessions to raise awareness on noticeable issues, which are then checked by management to oversee.

Within our supply chain, workers are taught to understand their rights, so that they are less exposed to the risks of modern slavery.

We are aware that bonded labour is an issue in some of the countries that we source from, and it is something we strongly oppose. We source from Tamil Nadu, a state in southern India, where there is a lack of employment practices and a form of bonded labour known as Sumangali. This form of employment means that women

are recruited from impoverished and remote rural villages to work in textile mills.

Consequently, these conditions mean that women are vulnerable to abuse and face severe labour rights such as:

- Contract lengths of 3-5 years, after which the worker is paid a lump sum.
- Poor health and safety conditions (e.g. illness caused by dust exposure).
- Wages below the national minimum.
- Uninhabitable living conditions as staff are often forced to work in company-owned hostels (camp labour).
- Child labour – excessive working hours and working on-call.
- Denied rights to freedom of association and collective bargaining.

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

We are also part of financial inclusion programmes in India and Bangladesh, with partner organisation Geosansar. The emphasis of this programme is to promote financial literacy to low-income workers and provide access to financial products wherever required.

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

The more we understand the underlying challenges in our supply chain, the better we can target our approach. It is important to have access to remedy and adequate channels to deal with modern slavery cases. We must focus our attention on proactively training the people in our supply chain. This year, though our partnership with Anti-Slavery International, our procurement and supply chain team for goods not for resale attended a training workshop on how to refine our risk assessment and due diligence mechanisms to prevent and protect vulnerable workers.

OUR PROGRESS AND STEPS TAKEN

Through our own due diligence programmes and consultation, we have identified different areas at a greater risk of modern slavery. The below table highlights the progress that we have made in these areas. We understand that our knowledge of these issues will increase as our programmes progress; we will review the risks (and how we address them) on a continuous basis.

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	Potential Risk	Progress
Goods For Resale Supply Chain	<p>Potential for heightened risks of modern slavery going undetected if the supply chain is not transparent.</p> <p>Unauthorised subcontracting.</p>	<p>Aim: Continually increase the transparency of our product supply chain.</p> <p>Progress:</p> <ul style="list-style-type: none"> • We started publishing our Tier 1 factory list on our group website in September 2017: <ul style="list-style-type: none"> ◦ This is updated biannually. ◦ China and Bangladesh represent 51% of the total workforce for Tier 1 factories. • In FY19 we sourced 78% of our products from our 10 largest suppliers and have mapped 80% of their Tier 1+ and Tier 2 supply chains. • We have mapped tanneries making leather products. • We have recently launched a compelling sustainability agenda with ambitious targets to limit the impact at every step of our supply chain. We will increase transparency further with the following targets: <ul style="list-style-type: none"> ◦ 100% of wet processing units disclosed by 2020, with additional plans to monitor and promote best practice in place; building on the self-assessment findings gather from our top 5 clothing suppliers' supply chains in 2018. ◦ 100% sustainably sourced cotton by 2021. ◦ 100% traceable and sustainable viscose by 2023. • In the UK, we have assessed Tier 1 and Tier 1+ against the Fast Forward standard, whose methodology provides an assessment of audited sites against forced labour and modern slavery indicators. Warehouses and reprocessing units are now being targeted. • We have operated an unauthorised subcontracting policy for a number of years, requiring all Tier 1 factories manufacturing New Look product to be registered following our CSR requirements prior to production being placed. This reporting year we have not uncovered any case of unauthorised subcontracting linked to financial penalties.
	<p>Suppliers must ensure their labour providers meet our standards. Failure could result in a risk of forced or bonded labour situations.</p>	<p>Aim: Understanding risk faced by agency workers in our supply chain.</p> <p>Progress:</p> <ul style="list-style-type: none"> • FY19 we mapped agency workers in our Tier 1 supply chain. <ul style="list-style-type: none"> ◦ Progress on this area has been limited to key countries such as the UK. ◦ We have forged key partnerships that will help us address this issue in the next year on a more global scale, evaluating specific modern slavery risks for agency workers in our suppliers' factories. • We have risk assessed our Tier 1 supply chain to identify agency workers: <ul style="list-style-type: none"> ◦ 2% of the total workforce globally is formed by agency workers. ◦ 97% of these workers are in factories in 3 countries: India, Turkey and Sri Lanka. ◦ Our data by country shows that 13% of the Indian workforce is agency workers, representing 72% of the agency workforce globally. This number is followed by Turkey, where 4% of the workforce is agency, and that is 21% of the total agency workforce globally. • In the UK it is standard practice to map and screen compliance of labour providers through Fast Forward. • A further consideration is the number of temporary workers in our Tier 1 supply chain. • Our data shows that 18% of the Pakistani workforce is temporary, accounting for 89% of total temporary workforce globally. This is followed by Spain with 59% of its workforce being temporary (3% of total temporary workforce globally).

	Potential Risk	Progress
GoodsFor Resale Supply Chain	<p>Suppliers' use of migrant workers recruited through agencies can put workers at risk of exploitation, unaware of their rights and terms of contract.</p> <p>Migrant workers are recognised as more susceptible to debt bondage.</p>	<p>Aim: Set out clear standards which must be met on the use of migrant workers,</p> <p>Progress: We have drafted a migrant labour and contract worker policy which is included in the CSR section of the supplier manual</p> <p>Aim: Achieve a clearer picture of the use of migrant workers in our supply chain</p> <p>Progress: We conducted a preliminary risk assessment using data from Tier 1 third party audits:</p> <ul style="list-style-type: none"> • Progress in this area has been limited to key countries such as the UK where we have more direct involvement in the Fast Forward programme and factory audits. • Follow up risk assessments were conducted to locate migrant workers in Tier 1: <ul style="list-style-type: none"> ◦ Migrant workforce represents 6% of the total workforce globally. ◦ 94% of the global migrant workforce concentrates in China, where 40% of workers are migrant. ◦ Other countries with a high proportion of migrant labour are the United Arab Emirates with 100% (of only one factory), followed by Tunisia with 48% and UK and Serbia with 35%.
	<p>Suppliers' failure to have in place proper HR controls can lead to children being employed illegally.</p>	<p>Aim: Ongoing implementation of our child labour policy and remediation plan</p> <p>Progress:</p> <ul style="list-style-type: none"> • We have checks in place to identify young workers and support suppliers and young workers in cases where they are found. <ul style="list-style-type: none"> ◦ We have not found any cases of child labour FY19. • 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 is a key focus area on our assessments
	<p>Refugee workers are more vulnerable to human trafficking, forced, and bonded labour. Refugee workers are particularly prevalent in Turkey.</p>	<p>Aim: To support the no discrimination and fair treatment of refugee workers when found in our supply chain.</p> <p>Progress:</p> <ul style="list-style-type: none"> • We continue to implement our refugee policy and remediation plan to our supply base in Turkey. <ul style="list-style-type: none"> ◦ Since the implementation of our refugee policy and remediation plan in 2016 we found 9 cases of refugees working without work permit. ◦ All cases found have been dealt the same way, with factories respecting worker rights, treating them the same as the rest of other workers as well as helping workers apply for work permit. ◦ In May 2018 we recorded 2 cases of Azerbaijani refugees being employed in one factory in Turkey. Our remediation plan was implemented immediately but over time, both workers decided to leave the business voluntarily, one not long after our visit and the other one in April 2019. • We are part of the ETI working group in Turkey and will continue our commitment to this collaborative platform.
	<p>Women workers are particularly vulnerable to exploitation.</p>	<p>Aim: Identify concentrations of women in our supply chain who may be in a vulnerable position.</p> <p>Progress:</p> <ul style="list-style-type: none"> • As per our migrant and agency workers, we also carried out the same analysis in the last financial year for identifying concentrations of women workers in our Tier 1 supply chain. <ul style="list-style-type: none"> ◦ According to our data, 51% of the total workforce of our Tier 1 supply chain is female. ◦ 76% of the total number of female workers globally are located in only five countries: Bangladesh, China, Turkey, Cambodia and Myanmar. • In India, we are working with ETI to deliver Nalam programme in our supply chain. • We are working with Geosansar in a financial inclusion programme in India and Bangladesh, to train workers on financial management matters.

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	Potential Risk	Progress
Services And Goods Not For Resale	Lack of knowledge about our suppliers, leading to a higher risk of undetected modern slavery issues.	<p>Aim: Increasing transparency of how our service providers and goods not for resale suppliers operate, to be able to identify and guard against modern slavery risks and to help them do the same.</p> <p>Progress: during FY19 we reflected on the work done since FY17 on our due diligence and risk screening process, as a result we engaged with Anti-Slavery International, who reviewed how we approached our GNFR space and worked with us to assess how we could take a more impactful approach.</p> <p>Relevant progress in this area:</p> <ul style="list-style-type: none"> • By the end of FY19 we had improved our vendor on boarding processes to ensure we conduct a more focused initial screening of GNFR suppliers to identify where there may be a heightened risk. • We revised our secondary assessment for suppliers who were identified as requiring a more detailed review through a more in-depth modern slavery questionnaire. • Following the detailed screening of those suppliers highlighted as a potential risk within our GNFR supply chain we are introducing monthly reporting to Senior Management based upon an agreed risk grading. • We continue to ensure all new contracts include a Modern Slavery clause with our own standard contracts, purchase orders and terms and conditions updated to incorporate this and to underpin New Look's policy requirements. • FY20 we will continue to focus on existing contracts where there is an absence of a Modern Slavery clause to ensure this is updated to incorporate our Modern Slavery clause prioritized on a high risk categories basis. • In addition, we will revisit our existing supply base again focusing on high risk categories to assess their policies and practices through collection of data using our newly revised in-depth modern slavery questionnaire. • We have established within our reporting tool methods to identify high risk suppliers across our GNFR supply chain and our focus this year will be to identify how we can work with our supply chain to address any risks and establish appropriate auditing.
Our Own Operations	Labour providers we use not adhering to the high standards set out in our policy, including a prohibition on charging fees to workers, for example. Such failure results in a high risk of forced labour situations.	<ul style="list-style-type: none"> • We have used a single agency: GI Group, since May 2017 to supply our Distribution Centre, the main area in our business where we rely on temporary agency labour, particularly at peak times. GI Group does not use overseas partners, and only recruits foreign workers already resident in the UK, which reduces the modern slavery risks associated with travel for work. They operate robust checks for modern slavery indicators, such as duplicated bank details (suggesting someone else may be collecting workers' wages), similar mobile phone numbers (suggesting SIM cards may be bought and distributed in bulk to groups of workers) and forged or invalid personal documents. Our time and attendance systems also safeguard against worker substitution. • GI's commitment as a Stronger Together Business Partner and active members of The Association of Labour Providers, The Recruitment and Employment Confederation and the GLAA Labour Provider/User Group provide us with a consistent flow of information and support tools. • GI Group is regularly audited and provides monthly management reports to show the recruitment activity including the nationality of our temporary workers. They assess, recruit and on-board all of our agency workers on our behalf. In a Peak period (cyber for example) 48% of our warehouse workforce would be employed through the GI Group. Our normal run rate (when not in a peak period) of agency workers is 31% of our warehouse staff.
Our Partners	Failure by our partners to comply with our standards, leading to increased risk of modern slavery arising in their businesses, which operate under our brand.	<p>Aim: Our first focus remains on our own business and supply chain, but we recognise that it is also important to work with our partners to highlight modern slavery as an issue and check they are complying with our policy.</p> <p>Progress:</p> <ul style="list-style-type: none"> • FY19 we have updated all our standard contracts (also referenced in our Letter of Intent which is used ahead of a new partner signing our long form agreement) to include our Modern Slavery Policy. • We experience a delay to our E-Learning module being fully developed. This is now complete, and we will roll this out across all partners as we still believe that this is the best way to make clear the standards New Look expects from its International Partners.

EFFECTIVENESS OF OUR APPROACH AND CONTINUOUS IMPROVEMENT

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

Our three new partnerships are examples of this. Anti-Slavery International, The Reassurance Network and The Textiles Protocol in the UK all support us on our journey in several ways.

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

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

- We will continue our efforts to deliver training to increase awareness across the organisation. This includes external parties and key contractors.
- We will place a strong focus on tailoring a collaborative approach, and alert to existing modern slavery risks that are shared across the industry.

- Where visibility is clouded, we will continue to achieve greater transparency throughout our supply chain. To reach our goal, we will embed targets across the organisation, such as pledges including: 100% sustainable cotton by 2021; and 100% traceable viscose by 2023. We also promise to map our wet processing units for chemical management and the embedding of worker demographic analysis for our GNFR suppliers.
- We will continue to seek guidance and support from expert organisations on handling modern slavery cases.
- We will continue to raise awareness and build the capacity of our varied supply chains. This work will also include a renewed approach of our whistleblowing policy.

New Look's Modern Slavery Statement was prepared by our Modern Slavery Working Group and approved by the board of directors on 6th June 2019.



Nigel Oddy
Chief Operating Officer

New Look Retail Group Limited
25 June 2019