

Modern Slavery Statement

At New Look we believe in respecting and improving the lives of workers right across our global business and supply chain, paying particular attention to modern slavery risks and indicators. We recognise that modern slavery is a global issue and that no economy, industry or sector is immune. We are committed to doing all we can to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

Following our first statement published last year, this is the second statement which documents our ongoing commitment to preventing modern slavery, progress that we have made to end of financial year 2017/18 and our focus areas for the future.

Who we are

The New Look story began in 1969 with a single fashion store in the UK. From there, we've grown to become a leading fast-fashion brand. Our structure has not changed in the last year; since 2015, the New Look group has been majority owned by Brait, an investment holding company with a c. 90% interest in New Look. The Singh family and New Look management still hold the remaining c. 10%. Within the New Look group, New Look Retailers Limited is the main employer and trading entity .



£1.3BN

FY18 REVENUE

Revenue £1.34bn for year to March 2018

On a store contribution basis. Store contribution is gross profit less directly attributable costs (i.e. excluding an apportionment of distribution costs) in stores which have been trading for 12 months.



18,000

EMPLOYEES

c.18,000 employees globally



850

PEOPLE

c.850 people through employment agencies, at peak trading times



895

STORES WORLDWIDE

895 including franchise (826 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 depicts our supply chain, and the different areas where people are employed. Our approach to identifying risks is based on this diagram. Slavery, servitude, forced and bonded labour, and human trafficking are issues of global concern, potentially affecting all areas of our business and the people working there if the right due diligence mechanisms are not put in place.



Our own operations: Stores, Support Centres and Distribution Centres

We own 826 stores in the UK, Republic of Ireland, France, Belgium, Poland and China.

We have two large UK Support Centres in London and Weymouth, complemented by international support centres in Shanghai, Paris, and Warsaw. In the UK we operate our own highly automated distribution centre in Staffordshire handling retail stock for our stores, despatching to our franchise and wholesale partners, and fulfilling global E-commerce orders. This operation is complemented by additional support for our Asian markets from outsourced distribution hubs in Singapore and Shanghai.

We employ approximately 18,000 people and engage up to a further c.850 people through employment agencies, at peak trading times.

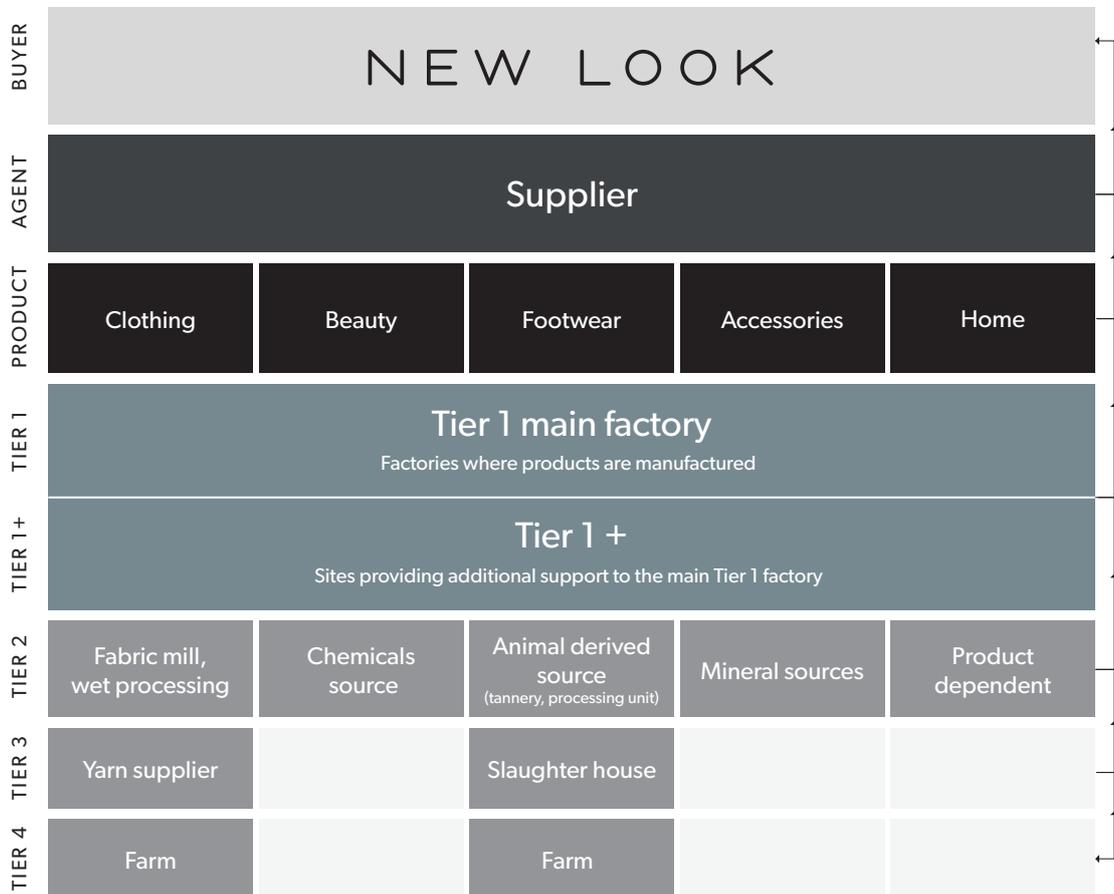
Our partnerships: Franchise Stores and 3rd Party E-Commerce

In addition to our own stores, New Look has long standing relationships with over 15 partners globally. Some of these are New Look franchises, which operate stores in our name overseas. Others are 3rd Party E-commerce partners, like ASOS, who sell our products online. The franchise and third party organisations we contract with employ their own people in the stores they run and businesses they operate.

Goods for resale Suppliers

These are the suppliers of products and services that we sell in our stores and on our website, including products made by other brands that are sold in our store or on our website.

There are many people involved in the supply of our products before it reaches our Distribution Centres. To meet our customers' needs, we have a global supply chain and we source our products from 196 suppliers, through 770 factories across 25 countries, involving c.320,000 workers¹. At New Look, we map and describe our goods for resale supply chain as shown below.



¹Worker number based on information from audit reports of Tier 1 sites only. Data from our latest annual report covering the financial year ending on 24 March 2018

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 3,700 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, 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. In September 2016, we published our Anti-Slavery and Human Trafficking Policy, which outlines our commitment to acting ethically and enforcing effective systems and controls to prevent modern slavery in our own business and within our supply chains, as well as our activity in the event of an incident.

New Look's directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations and that everyone it applies to complies with it. Department heads have primary and day-to-day responsibility for implementing this policy in their specific areas. Suppliers have responsibility for upholding it in their business and onward supply chain.

We work hard to try to make sure our suppliers, contractors, partners and businesses further down our supply chains are aware of and understand their obligations under our policy.

We have an active Modern Slavery Working Group formed of representatives from different areas of the business, leading the work on this particular agenda.

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

- Our Equal Opportunities and Dignity at Work policies apply to our people, and outline the ways in which we look to eliminate discrimination and keep our workplaces free from any form of bullying or harassment.
- Our Ethical Aims reflect our commitment to acting ethically and with integrity in all our wider business relationships, including enforcing effective systems and controls to guard against slavery or human trafficking taking place at any point in our supply chains.

- Our Code of Business Ethics sets out the ethical standards we require our people and those we work with to live up to. We work continually to develop and revise the code to deal with new risk areas and the changing nature of our industry.
- Our Whistleblowing Policy applies to employees, contractors and anyone else acting on New Look's behalf. It encourages reporting of any wrongdoing and sets out a clear procedure for raising concerns. We have also extended this principle of whistleblowing into our supply chains.

In addition to the above and as part of the ethical policies and standards from our supplier manual, also have a number of additional Corporate Social Responsibility (CSR) policies, including our Refugee Policy and Child Labour procedures, all of which our product suppliers must sign up to and adhere to.

New Look acknowledge the need to drive initiatives beyond our principal manufacturing sites, and deeper into the supply chain, to identify areas of potential high risk presented by unauthorised subcontractors or the exploitation of a growing migrant workforce or other sectors of vulnerable labour. We continually strive to test our policies and processes to achieve this, our immediate focus is on ensuring our ethical standards are fully embedded into our own organisation and direct supply chains.

Collaboration and partnerships

At New Look, we are committed to tackling Human Rights issues directly. We have a dedicated CSR team and we instil CSR in every part of our business. The CSR team works closely with our buyers and goods for resale suppliers to monitor purchasing practices and understand the impact on people in our supply chain.

To live up to our global CSR goals and address the complex issues facing the fashion industry, we think it's vital that we partner with governments, the private sector, civil society, trade unions and other stakeholders. Our partners range from international organisations to local Non-Governmental Organisations (NGOs) and on-the-ground specialists.

We are a member of the Ethical Trading Initiative (ETI), an organisation which brings corporate, trade union and NGOs together in a unique alliance to tackle ethical issues. New Look has adopted the ETI's Base Code of Conduct which is based on the standards of the International Labour Organization (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; sharing information and supporting projects. In March 2018, New Look was one of the brands attending CEO Forum on Modern Slavery hosted in the House of Lords (London)² to identify and address shared risks in the apparel sector.

We're also members of the Business Social Compliance Initiative (BSCI) using their supply chain management system as one of our preferred standards for factories to follow. BSCI implements the principle international labour standards protecting workers' rights such as International Labor Organization (ILO) conventions and declarations, the United Nations (UN) Guiding Principles on Business and Human Rights and guidelines for multinational enterprises of the Organization for Economic Co-operation and Development (OECD).

² Event organised by the House of Lords and ASOS.

Risk prioritisation & management

As a large brand we know we have a responsibility towards every individual who contributes to our business, whether that's as an employer protecting our employees, as an end-client ensuring our temporary staff are looked after by their agencies, or as a leader supporting our franchise partners to do the same. When it comes to our suppliers, we need to both set the right example, and be able to insist on appropriate standards being upheld.

We recognise that there is a greater risk of modern slavery affecting our people or supply chains where the following risk factors are present:

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

Underlining all these factors is the need to have visibility of our supply chain and subcontracting by our suppliers, to enable us to identify risks and address them proactively.

We have identified our core responsibility as having visibility of the groups that are at greater risk of modern slavery and ensure they're protected. We have therefore focussed our efforts according to the above risk factors, along with our perception of where we can best make a difference. We believe the most risk lies in our outsourced employment (agencies) across our supply chains and further down the goods for resale supply chain, where we inevitably have less or no visibility and control of workers and employment practices, so we have prioritised mapping our supply chain. See our progress at the end of our statement for details of what we've been up to.

Our due diligence mechanisms

Our own operations

We recognise that modern slavery could occur in our own recruitment processes without the right checks and procedures in place. We therefore ensure, when engaging anyone as an employee of New Look, that a robust recruitment selection process has taken place which is managed centrally by a trained recruitment team. It is important to us that any of our applicants/potential hires apply for opportunities at their own free will or give full permission to be represented by a third party (which is agreed in our terms and conditions with our recruitment agencies and workforce suppliers).

This has also been achieved through strengthening our direct hiring model; over 80% of our employees are hired directly without the assistance of recruitment agencies. Where we do require any support in the hiring process, we have also reviewed our agency partnerships to ensure that we are only working with employment agencies that have the same ethical standards as our own. We review these suppliers on an ongoing basis.

Recruitment agencies used in our UK distribution centre have been subject to our own audit process. The distribution centre has also set up an independent and well communicated whistleblowing hotline which went live in April 2017.

Our goods for resale supply chain

We monitor our Tier 1 goods for resale supply chain through independent third party audits and specialised programmes. We also have an internal CSR team who visit factories to carry out audits and encourage transparency. While we are mindful of limitations of audits as they only provide a snapshot in time and do not always highlight the complete issues, they do provide important input for risk assessment which is combined with partner reports and market studies to help us understand the risks.

We also use an online onboarding process for new suppliers 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 aspects.

In the UK, and as a founding member of the Fast Forward programme, we use its audit methodology to assess our sites and evaluate modern slavery risks through a series of indicators.

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

As part of our commitment to transparency we also made our [Tier 1 factory list](#) public and update it on a biannual basis.

Our Services and Goods not for resale supply chain

For our suppliers providing services and goods not for resale (GNFR), we have used an objective risk scoring methodology to classify our entire supply base according to the country of origin of goods or services supplied, the prevalence of modern slavery risk in the category or sub-category of the spend (measured according to objective third party risk data) and whether or not the vendor provides any goods to us containing materials identified by third party data as carrying an enhanced risk of modern slavery in the supply chain for that item.

During FY17/18, all new services and goods not for resale suppliers were risk scored before entering into business with New Look, a practice that is now established for any new GNFR supplier.

Any suppliers flagged as having higher risk using this methodology are now asked to complete a detailed questionnaire, which will be reviewed by our Procurement and Corporate Governance teams, with support from our CSR team. Where the answers to the questionnaire do not satisfy New Look, a detailed audit of the supplier will be carried out.

When it comes to logistics/warehousing, all suppliers have been subject to the services and goods not for resale risk scoring and we have commenced a review of all current contracts in place. The majority of these suppliers have undergone a contract review to ensure inclusion of modern slavery clauses and we are aiming to have this completed to ensure all are covered by contracts containing modern slavery clauses by the end of 2018. In addition we will engage with our key logistics suppliers during FY18/19 to meet their CSR leads to ensure an ongoing and open channel of communication between the parties.

Our third party E-commerce and franchise partners

In 2017 we introduced New Look's modern slavery approach to our global partners as part of our brand days. We took this as an opportunity to refresh their understanding of our ethical policies. An eLearning module is being developed to launch in 2018, which will allow us to communicate our Anti-Slavery and Human Trafficking Policy to all of our partners globally. This tool will allow us to monitor the partners' completion of the module and where appropriate we will introduce a due diligence process to monitor the adherence of our standards.

Access to remedy

It is essential to empower workers to speak up and raise any concerns in total confidence. We have whistleblowing helplines for GFR factories in three of our strategic countries, Bangladesh, China and the UK. We are exploring the wider rollout of a global helpline, however we recognise that to implement effectively, this will take some time as this must go hand in hand with having an appropriate infrastructure in place to offer help if a person is in danger. At present, we are reviewing how to best implement a more appropriate solution. For this reason, our contract in China is currently being reviewed

and while active, the hotline was promoted by NGO Inno Community Development at 30 factories available to 6,464 employees in total. A further 270 factories with 51,300 employees have conducted the hotline training themselves or by suppliers.

In the UK, all of our sites must be enrolled in the hotline programme. Each factory manufacturing or processing New Look goods must have posters around the premises in order for workers to call if they need to. Additionally, when we visit factories we hand out cards with both the Speak Up details and New Look's CSR team details in order for workers to call if they need to.

*In FY 17/18 we logged 6 reports in relation to alleged issues with factories. The nature of issues encountered this year included unauthorised subcontracting, holiday pay, workers concerns about working conditions and working hours, alleged discrimination. We addressed each report on a case-by-case basis and tailored remediation plans that don't put workers at risk.

Through the newly promoted whistleblowing line in our UK distribution centre, we received two calls which were not related to modern slavery and have been fully investigated.

We have also set up designated communication channels for our own employees and suppliers to raise modern slavery concerns and appointed a Modern Slavery Officer for the business as part of New Look's Anti-Slavery and Human Trafficking Policy. We have a remediation plan to be followed in the event that forced labour, modern slavery or human trafficking activities should be found or alleged 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 surrounding the case.

Training

To ensure an understanding of the risks and possible indicators of modern slavery and human trafficking we provide briefings to our directors and training to all our New Look employees, with an emphasis on encouraging their vigilance and willingness to challenge a situation.

We developed a mandatory eLearning programme in-house for all employees globally. It aims to help people understand what they need to do, and how to work together internally or externally if they encounter something that raises concerns. Completion rates have been good, with 68% of our UK staff having completed training in the first year of the module but lower completion rates in our international markets. This is something we are determined to address and improve in 2018/19.

When it comes to manager training, we have added accountability for managers who now have monthly reporting in place for training completion, but our next challenge is how to use the information in the reports more effectively. Our aim for next year is to increase completion rates significantly.

We have also delivered training on raising awareness among our UK supply base through a series of workshops under the Fast Forward programme.

It's also important that we continuously raise awareness and build the capacity of workers in our supply chain to understand their rights and be less exposed to the risks of modern slavery. We're part of different programmes, such as the Sumangali programme in South Indian Mills, financial inclusion programme in India and Bangladesh, worker forum training in the UK through ACAS, social dialogue in Bangladesh and Turkey and the ILO SCORE programme in China.

The more we understand the underlying challenges in our supply chain, the better we can target our approach. Whereas it's important to have access to remedy and proper channels to deal with modern slavery cases, we must focus our attention on how can we be more proactive and train the people in our supply chain.

Our progress and steps taken

Through our own due diligence programmes and consultation with different business departments we identify a number of areas at a greater risk of modern slavery. The below table highlights some of the progress we've made in these areas. We acknowledge that our knowledge of issues will inevitably increase as our due diligence programmes progress. We review these risks and how we address them on a continuous basis.

	Risk Factor	Progress Towards Mitigating Risk
Goods for Resale Supply Chain	<p>Lack of visibility of supply chain. Potential higher risk of undetected modern slavery issues.</p> <p>Unauthorised subcontracting is a key factor in clouding visibility.</p>	<p>Aim: Increase understanding and visibility of our product supply chain.</p> <p>Progress:</p> <ul style="list-style-type: none"> We now have full visibility of our Tier 1 factory base and made it public in 2017 following our commitment to have a transparent supply chain. In FY17/18 we sourced 83.6 % of our products from our 20 largest suppliers and have mapped 63.6% of their Tier 1+ and Tier 2 supply chains. We have also mapped tanneries for our leather supply chain and now are in the process of mapping wet processors. In UK, we have assessed Tier 1 and Tier 1+ against the Fast Forward standard. Currently we're assessing our warehouses in the UK and will give a progress update next year. The Fast Forward methodology provides an assessment of audited sites against forced labour and modern slavery indicators. In Turkey, 90% of Tier 1+ have been mapped . We're putting in place a system to ensure we risk assess them jointly with our suppliers on the ground. In the last year we gained visibility of our cotton supply chain. As part of our first year as Standard Member of BCI we sourced over 5% of cotton as Better Cotton. We're currently working with our commercial teams to agree on sourcing targets for the next 5 years. This gives us visibility of the country of origin of the Better Cotton sourced across the business. <p><u>We operate an unauthorised subcontracting policy, which has been in place for a number of years. Under this policy all Tier 1 factories manufacturing New Look product must be registered following our CSR requirements prior to production being placed. This reporting year we uncovered 3 cases where suppliers received a financial penalty. Additionally our subcontracting policy provides first time offenders with a warning. If subcontracting occurs more than once, suppliers face penalties. In one of the cases, one of our team members audited a factory in China and found out that the factory had subcontracted some of the production. An immediate investigation was conducted with a visit to the subcontracted sites, where there was New Look product. We've also had a number of cases where warnings were given to suppliers. An example of a warning given to a supplier was when they were not fully clear on factory requirements and mistakenly had placed orders at a non-registered factory.</u></p>
	<p>Failure by our suppliers to hold labour providers to our high standards, resulting in a high risk of forced or bonded labour situations.</p>	<p>Aim: Increase our understanding and risk faced by agency workers in our supply chain</p> <p>Progress:</p> <p>We can't address this without knowing where agencies are used. So, as a first step we performed a preliminary risk assessment of our supply chain based on information from third party audits and found:</p> <ul style="list-style-type: none"> 19% of the Indian workforce is agency workers, representing 91% of global total agency workers and 2% of the entire global workforce. Agency workers in Turkey represent 5% of agency workers globally (1% of workforce in the country). This is followed by Pakistan (2% of agency workers globally, 0% of workforce in country). In the UK it's standard practice to map labour providers through Fast Forward, which will then be screened for compliance. <p>We've used audit information to map agency workers. Our next area of focus will be to evaluate modern slavery risks for agency workers.</p>

	Risk Factor	Progress Towards Mitigating Risk
Goods for Resale Supply Chain	Suppliers' use of Migrant Workers recruited through agencies can be prone to exploitation, and unaware of rights and terms of contract. Migrant workers are more susceptible to debt bondage.	<p>Aim: set out clear standards on using migrant workers, which suppliers must adhere to.</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: get a better understanding of where migrant workers exist in our supply chain, so that we can better address the risks.</p> <p>Progress: When it comes to risk assessing migrant workers globally, we've used information from Tier 1 audits.</p> <ul style="list-style-type: none"> • 43% of Chinese workers are migrants (local). These migrant workers account for 7% of our entire global workforce. • Migrant workers represent 20% of the workforce in the UK (but this only accounts for 1% of global total migrant workers). • Migrant workers in India account for 3% of global total migrant workers, followed by Pakistan (2%). • In Turkey, despite current reports of increased Syrian refugee numbers in the country, audit reports from Tier 1 factories shows no migrant workforce. This gives us an indication that Syrian refugees are located in lower tiers of the supply chain. Please refer to our progress below. • We are actively working within our key supplier in the region with a formal approach to manage risk below tier 1.
	Suppliers' failure to have in place proper HR controls can lead to children being employed illegally.	<p>Aim: continued implementation of our child labour policy and remediation plan which suppliers must adhere to. We have in place checks to help identify young workers and support suppliers and young workers in cases where they are found.</p> <p>Progress:</p> <ul style="list-style-type: none"> • We continue to monitor the presence of young workers through our factory visits and 3rd party audits. • In China, our team worked with local stakeholders on the ground and suppliers to deliver age verification training in 233 factories. • In UK, age verification is part of the Fast Forward audit programme and follows strict protocols to verify right to work.
	Refugee Workers are more vulnerable to human trafficking, forced, bonded labour. Refugee workers are particularly prevalent in Turkey.	<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. All cases found have been dealt the same way, with factories respecting worker rights, treating them the same as the rest as well as helping workers apply for work permit. • We are part of the ETI working group in Turkey and continue to work collaboratively to find solutions and lobby relevant stakeholders for the betterment of the employment conditions of refugee workers. <p><u>In FY 17/18 we recorded 3 cases of Syrian refugees being employed in two factories. In all cases our remediation plan was implemented immediately and all cases have applied and are awaiting for the work permit. We work very closely with our key supplier on the ground to actively follow up on the progress of these applications as well as working conditions on the factory floor.</u></p>
	Women Workers are particularly vulnerable to exploitation.	<p>Aim: Understand where there are concentrations of women in our supply chain who may be vulnerable.</p> <p>Progress: We did an initial analysis of the gender breakdown in our supply chain:</p> <ul style="list-style-type: none"> • Of all female workers in our global supply chain, 49% are based in China and Bangladesh. This represents a quarter of total workers in our supply chain (25%). • Of all male workers in our global supply chain, 52% are based in Bangladesh and Pakistan. This represents a quarter of total workers in our supply chain (26%) • In India, we are working with ETI to deliver Nalam programme in our supply chain. • In Bangladesh, our factories which are part of ETI social dialogue programme where women workers are being encouraged and trained to represent the workforce. • Additionally, we're working with Geosansar in a financial inclusion programme in India, to train workers on financial management matters.

	Risk Factor	Progress Towards Mitigating Risk
Services and goods not for resale	Lack of knowledge about our suppliers, leading to a higher risk of undetected modern slavery issues.	<p>Aim: Know our service providers and goods not for resale suppliers better, so as to be able to identify and guard against modern slavery risks and to help them do the same.</p> <p>Progress: In 2016/17 we conducted an initial review of our general due diligence protocols for goods not for resale supply base and identified key risk areas. We also began supplier screening and a more comprehensive risk profiling</p> <ul style="list-style-type: none"> • By the end of 2017/18 we had implemented new vendor protocols. Under this new process, GNFR suppliers are given an initial screening to identify where there may be a heightened risk within the supply of goods or services against a number of key criteria and where flagged for further assessment a detailed modern slavery questionnaire is issued to ascertain further detail in respect of their policies and practices. • In addition, throughout 2017/18 we finished reviewing all existing suppliers to conduct a basic screen and are in the process of sending out the more detailed questionnaire to those flagged for further assessment. • Following the detailed screening of those suppliers highlighted as a potential risk within our GNFR supply chain we will be introducing monthly reporting to Senior Management based upon an agreed risk grading. • In 2016/17 we updated our standard contracts, purchase orders and terms and conditions to underpin New Look's policy requirements. • In 2017/18 we have continued to use our standard terms in the vast majority of contracts. Of our top 12 suppliers across Logistics and Shop Fit Kit 7 contracts already contained our Modern Slavery clause whilst the remaining 4 have recently had addendums issued to address. The remaining supplier is contracted under a JCT agreement and therefore, modern slavery will be managed. • We have established within our reporting tool methods to identify high risk suppliers across our GNFR supply base 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.	<p>In May 2017 we appointed G.I. Group, a new, single agency to supply our Distribution Centres, the main area in our business where we rely on temporary agency labour, particularly at peak times. Our new agency 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.</p> <p>Our third party agency, GI Group are regularly audited and provide monthly management reports to show the recruitment activity including the nationality of our temporary workers. We use one provider; GI Group, they assess, recruit and on-board all of our agency workers on our behalf. In a Peak period (cyber for example) 44% of our warehouse workforce would be employed through the GI Group.</p> <p>Our normal run rate (when not in a peak period) of agency workers is 28% of our warehouse staff.</p> <p>In our support centres, a review of our temporary contract terms and providers was undertaken and outsourcing this was considered but due to the low usage of temps it was decided that it was not beneficial considering the cost to outsource.</p> <p>As we have a very low usage of agency temps within our support centres and stores and our terms of business are sufficient for our requirement we decided to put this on hold. The agency partners were also reviewed and it was decided that we had a good selection that were compliant with our policies.</p>
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: Although our first focus has been on our own business and supply chain, 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. We previously committed to further awareness training through our Brand Days.</p> <p>Progress: Due to a change in priorities, brand days have not taken place this year. Instead, our focus is on adapting our internal awareness programme for use by our international partners. We recognise that the greater risk lies with our smaller partners. We therefore believe that making our online e-learning module accessible to our partners, and requiring them to complete it, is currently the best way for us to make clear the standards New Look expects of our franchisees, and to start a meaningful dialogue in our wider business, based on a proper understanding of the reality of modern slavery in retail.</p> <p>We have a new onboarding process for franchise partners, which involves them going through the new GNFR process including the 'enhanced due diligence' questionnaire, designed to flag potential modern slavery risks.</p> <p>This year, our focus on partners' practices has found that many of our larger partners have already put in place great ideas about managing the risks of modern slavery.</p>

Effectiveness of our approach and continuous improvement

It's key to acknowledge the fact that modern slavery can happen in any area of our business. However, the complex, hidden and potentially criminal nature of labour exploitation, in particular relating to modern slavery, can be very difficult to uncover. Acknowledging that risk and the progress achieved so far in mapping the people within our supply chains has been a great internal achievement.

However we can't tackle this on our own, that's why we always advocate for collaborative approaches when possible, especially when we share our supply chain with many other international retailers. We must also rely on local organisations that can help us understand some of the underlying issues a worker at risk may face.

For next year, our focus will concentrate on the following areas:

- Deliver formalised risk assessments across the differing areas of our business. Establish action plans at a corporate level, not at department level through our Modern Slavery Working Group.
- We will continue to seek guidance and support from expert organisations on handling modern slavery cases as well as organising plans of action which offer effective access to remedy and result in swift appropriate action in the event of an incident.
- Whereas access to remedy is extremely important to support victims of modern slavery, we will continue to focus our efforts on being more proactive and do what we can to prevent modern slavery violations

from happening in the first place. We will continue to work on awareness raising and capacity building of our varied supply chains.

- We will continue to further our efforts on mapping lower tiers of our supply chain where we currently have little or no visibility of working conditions and strengthen risk prioritisation and management of those tiers as we gain visibility.
- We will continue to seek an approach to tackle modern slavery that is collaborative, one that is alert to emerging risks and improves our preparedness to address them. We will advocate for what is right with relevant stakeholders involved.

New Look's Modern Slavery Statement was prepared by our Modern Slavery Working Group and approved by the board of directors on 19th September 2018.



Alistair McGeorge
Executive Chairman

New Look Retail Group Limited
September 2018