NEW LOOK
CORPORATE SOCIAL RESPONSIBILITY REPORT
2014-2015
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Imagery © Subathra Vaidhiyanathan
Welcome to New Look’s first CSR report. This report sets the ground for the development of an inclusive approach to ethical trade, animal welfare and the environment. We recognise the role of fashion groups like ours to influence the far-reaching social, economic and environmental impacts of the industry.

Since our work in ethical trade began in 1993 we’ve invested our efforts deep into our supply chain. Therefore, the time was right to not only adapt our initial work but also integrate our work and policies on environmental and animal welfare. Our CSR strategy will now be focusing on these three pillars, under which we’ve set out ambitious objectives. You will see these throughout the report.

New Look has long believed and is a champion of going beyond audits, focusing on the root cause of issues and addressing them. Our approach towards CSR would not be complete without the crucial support of our partners who bring expert knowledge around the specific issues affecting our supply chain. This valuable asset, combined with our experience and industry knowledge, results in a better project implementation and impact measurement, which eventually leads to a healthier supply chain.

Some of our key achievements over the last year have included:

- Reached over 200,000 workers through our CSR programme, 11% increase from last year
- Training 291 factories in Bangladesh, China, Cambodia, India, Turkey, Vietnam and the UK on health and safety, 6% more than last year
- Worked with 56 factories to deliver capacity building projects, 93% increase from last year
- Worked with 38 factories on women empowerment projects, 153% increase from last year

We welcome new legislation and policy updates such as the Modern Slavery Act and the UN Guiding Principles on Business and Human Rights, as they not only shape the global CSR agenda, but add meaning to the work we already do.

Creating a positive social impact in workers’ lives whilst reducing our environmental footprint and maintaining good animal welfare standards across our supply chain is an ambitious vision. Ensuring that this becomes a reality will require both hard work and further industry commitments that can only be achieved through collaboration. We’re committed to ensuring this becomes a reality not only because we believe in it but simply because it’s the right thing to do.

Thank you for your interest in our CSR work. Please read this report and visit our website to find out more.

Yours sincerely,

Anders Kristiansen
CEO

Letter from our CEO
Anders Kristiansen

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We welcome new legislation and policy updates such as the Modern Slavery Act and the UN Guiding Principles on Business and Human Rights, as they not only shape the global CSR agenda, but add meaning to the work we already do.
Founded in 1969, New Look has grown from a single store to become a dynamic international, multi-channel retail brand with a unique value-fashion offer in apparel, footwear and accessories for women, men and teenage girls. To meet our needs, we operate a vast, global supply chain in locations stretching from Eastern Europe to the distant Far East.

To us, CSR means improving the lives of the workers throughout the supply chain whilst working in a way to protect the environment and ensuring animal welfare. Our CSR strategy also aims to contribute to our core business and provides our staff with a New Look they can be proud of.

Our CSR programme is built on the strengths of the ethical trade programme. This is the first year we’ve integrated the three main pillars of ethical trade, animal welfare and environment within one programme. Each pillar contains its own focus areas. Due to the nature of the supply chain some projects address more than one pillar. This approach makes sure we’re adapting to feedback and industry developments as and when they occur. For us, our first thought in the decision process is to prioritise the issues that are important to workers and deliver real improvements for workers in our supply chain.

We consistently focus on using our experience and industry knowledge to tailor our approach to each issue in its local context. To create meaningful impact we speak to thousands of workers every year to understand their needs and priorities. Within this year alone we’ve spoken to over 3,000 workers, influencing the design of our CSR strategy.

As well as placing the workers needs at the centre of our strategy, we strive to achieve equal partnerships and shared responsibility with our suppliers. We hope this’ll deliver benefits and build on their ability to tackle these issues independently.

We partner with a number of external stakeholders who we’ve carefully selected based on where we see a good fit with their work and our CSR programme. We see this as a joining of both hands and forces to increase the impact of our work. This is reflected in the case studies and supporting information within this report.

We take pride in the fact we responded to 100% of queries from our workers and customers in the past year. We’ve also responded to queries from various stakeholders as we see this as extra knowledge. Our answers create a two-way information source that may help others.

We set ambitious targets to increase our impact for each objective. We’re meticulous in what we measure to make sure it provides the impact analysis appropriate to each specific project. Continual improvement is crucial for success, so throughout the report we’ve compared our results against last year’s performance.

We don’t underestimate the challenges we face but we strive to be bold and brave in our efforts to have the desired impact. We remain completely honest about where our projects don’t see the expected outcomes and look upon these as learning opportunities.

We hope the following sections of this report provide you with a full picture of our CSR programme. We will be pleased to hear from you if you would like to know more. You will find the details of our CSR team in the contacts section.

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<th>Commitment</th>
<th>2013/2014</th>
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<tr>
<td>Create positive impact for more</td>
<td>184,000</td>
<td>296,000</td>
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<tr>
<td>workers through our CSR programme</td>
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+11%
Partners

Here are some of the organisations we partner with:

The Accord is an independent, legally binding agreement between brands and trade unions designed to work towards a safe and healthy Bangladeshi Ready-Made Garment Industry. The Accord has been signed by over 200 apparel brands, retailers and importers from over 20 countries in Europe, North America, Asia and Australia; two global trade unions; and eight Bangladesh trade unions and four NGO witnesses.

www.bangladeshaccord.org

Better Factories Cambodia is a programme of the International Labour Organisation for the improvement of working conditions in Cambodia’s export garment factories. It combines independent monitoring with finding solutions (through suggestions to management), training, advice and information.

www.betterfactories.org

Business for Social Responsibility (BSR) are a global non-profit business network dedicated to working with businesses to create a just and sustainable world.

www.bsr.org
www.herproject.org

The Ethical Trading Initiative (ETI) is a leading alliance of companies, trade unions and National Governing Bodies (NGOs) that promotes respect for workers’ rights around the globe. New Look is an active member of the ETI and is committed to improving working practices in our supply chains through the application of international labour standards. The ETI Base code forms the basis of our Ethical Aims.

www.ethicaltrade.org

Geosansar is a social initiative based in India which aims to provide financial products and services coupled with education to the workers in the supply chain. We’ve worked together to provide workers in our supply chain with access to bank accounts and financial training.

www.geosansar.com

Impactt enables organisations to improve working conditions and livelihoods across global supply chains in a way that brings clear business benefits to both ends of the chain. We’ve worked with them on our projects in Turkey.

www.impactlimited.com

Nari Uddug Kendra (NUK) is a non-government national women’s development support organisation which promotes gender equality, human rights and personal empowerment of women and girls in Bangladesh. We’ve worked together to deliver our gender programmes.

www.nuk-bd.org

Solidaridad is an international civil society organisation that brings together supply chain actors to find innovative solutions to improving production and ensuring a transition to a sustainable and inclusive economy that maximises the benefits to all.

www.solidaridadnetwork.org

MADE-BY is a non-profit organisation that provides consultancy services to fashion and textile brands in order to improve environmental and social conditions within the fashion industry.

www.made-by.org

Camstone is an independent management consultancy specialising in corporate responsibility and sustainability.

www.camstone.com

BRAC Bank was established in 2001 to help build profitable and socially responsible business in Bangladesh through offering key financial services to small and medium sized enterprises.

www.bracbank.com

Phulki, meaning ‘spark’ in Bengali, is a non-profit organisation in Bangladesh that aims to promote and improve the rights of women workers and their children.

www.phulki.org

Founded in 2002, Alliance HR specialises in supporting businesses to implement fair employment and ethical trade supply chain solutions.

www.alliancehr.co.uk

The International Finance Corporation (IFC) is an international financial institution that offers investment, advisory, and asset management services to encourage private sector development in developing countries.

www.ifc.org
**Partners continued**

The Self-Employed Women’s Association of India (SEWA) is a trade union for poor, self-employed women workers in India. SEWA’s main goals are to organise women workers for full employment and self-reliance. SEWA aims to mainstream marginalised poor women in the informal sector and lift them out of their poverty.

www.sewa.org

Sustainable Clothing Action Plan (SCAP) 2020’s ambition is to improve the sustainability of garment life cycles. The SCAP 2020 commitment sees leading organisations from across the clothing sector – supply, re-use and recycling – working together to reduce the environmental footprint of clothing.

www.wrap.org.uk/content/scap-2020-commitment

Reed Consulting Bangladesh Ltd. helps different sectors in Bangladesh to be more responsible, sustainable and profitable.

www.reedconsultingbd.com

Centre for Promotion of Quality of Life (Life Centre) is a non-government and non-profit organisation registered with the Vietnam Union of Science and Technology Associations (VUSTA) since 2007. It has a mission to promote and enhance the quality of life of vulnerable people and communities by conducting research, training and implementing cost-effective, sustainable and high impact programmes.

www.life-vietnam.org

Marie Stopes International is an international NGO and was founded in China in 2001. The organisation provides a range of health services. They’re our project trainer for HER programme in China.

www.mariestopes.org

Sedex is a web-based database that enables suppliers to share information about the labour standards at their factories in a simple, efficient and cost-effective manner. We require our suppliers to provide assessment information for all factories producing our products using Sedex.

http://www.sedexglobal.com/

**Key Contacts**

Our eleven-member CSR team are based in the UK, Bangladesh, China, India and Turkey.

We’re a member of our CSR team on hand to answer any queries. Just email ethical.support@newlook.com and we will answer.

**UK**

Subathra Vaidhiyanathan - Senior CSR Manager

Subathra manages a global team of ten CSR members. She’s responsible for the designing and delivering our CSR strategy, encompassing ethical trade, environment and animal welfare and for crafting relevant goals, policies and programmes. She manages external stakeholder engagement and works closely with the executive and leadership team to make sure our CSR aims and objectives are a part of our business agenda.

Sophie Goddard - CSR Specialist

Sophie’s responsible for the project management and delivery of our CSR strategy. She focuses on producing new systems and processes for our international CSR Team to deliver the projects in a more efficient way. Sophie also develops and manages communication.

Rohini Kale - CSR Assistant

Rohini’s main role is to manage and maintain all internal and external data systems and be the main point of contact for suppliers and factories. She assists in research for project development and CSR internal and external communications. She also works with our Supply Base Team in order to manage our supply base.

Victor Serrano - CSR Assistant

Victor provides data analysis and communications support to the CSR Team in all aspects of raising the ethical, environment and animal welfare profile within the business and our supply base.

Ashish Sachdeva - UK Compliance Officer

Ashish looks after our UK supply chain and is responsible for conducting social compliance audits and monitor labour standards and sub-contracting. He develops and delivers training and projects for factories and suppliers to support improvements. Ashish also works closely with ETI on their UK based projects and programmes.

**FAR EAST**

Frannie Wen - CSR Manager Far East

Frannie’s key role is to deliver our CSR strategy in the Far East, which is our biggest sourcing country. Her role includes auditing and monitoring labour standards in factories, analysing improvements and region specific initiatives to drive the CSR programme forward.

Elvia Shi - CSR Specialist

Elvia’s key responsibility is to support Frannie in delivering our CSR strategy for the Far East. She also works with our key suppliers closely to carry out different assessments and background research to implement our projects. She focuses on the North China region.

**BANGLADESH**

Sharif Uddin - Ethical Trade Manager

Sharif is responsible for delivering our CSR strategy in Bangladesh. He conducts social compliance audits in our factories. Sharif also works closely with ACCORD, suppliers and factories on the remediation process.

**INDIA**

Giriraj Jajware and Sebastian George - Ethical Compliance

Giriraj and Sebastian play a key role in delivering our CSR projects in India. They conduct social compliance audits on regular basis making sure factories meet our compliance standards.

**TURKEY**

Sevinc Aktaş - Ethical Compliance

Sevinc is responsible for conducting social compliance audits and monitor labour standards and sub-contracting. She’s responsible for delivering our CSR projects in Turkey.
Here at New Look we place a determination to trade ethically at the heart of who we are and what we do. We believe that our business can have a positive impact on the lives and livelihoods of workers in the supply chain. Right across our global supply chain we would like to see good jobs sustained in safe working environments where workers are treated fairly.
Ethical Objectives

1. Continually improve workers’ lives and livelihoods
   We aim to improve the lives and livelihoods of every worker in our supply chain by driving continual improvements in pay and workplace conditions.

2. Empower people in factories to raise and resolve issues
   We want workers to be confident in their ability to represent themselves and bring about positive change in their workplace.

3. Build factory management skills and systems
   We want all of our factories to have effective systems in place to manage issues such as wages and working hours. We want managers and supervisors to have the knowledge and ability to resolve workers’ issues.

4. Build trust, transparency and shared responsibility along the supply chain
   We aim to build trust and openness through our supply chain. We see long-term and strong relationships as a way to build a sense of responsibility and a vision for ethical trade among our suppliers and factories.

5. Make sure our team & suppliers share the responsibility in delivering the ethical trade strategy
   We work to inspire belief in our ethical trade programme. Through this, we aim to embed shared responsibility within New Look, across our supply chain and throughout our stakeholders.
Our Approach

Building on these objectives we set an approach to incorporate them within the core of our business practice. This begins at the start of our relationship with each supplier. We make sure all suppliers sign up to our ethical trade policy. We don’t want to push responsibility away from ourselves so we partner with our suppliers to help them meet the requirements. For this to work we build open and honest relationships within our supply chain.

To help us build a picture of our supply chain we use audits completed by either our internal CSR team or a third party auditing company. We understand that an audit will only provide us with a snapshot of the real picture, hence we go beyond. It’s tackling the root cause that’ll help make sure change is sustainable. Therefore our projects are our main tool to improve our global supply chain.

In the last year we’ve implemented 65 projects across seven countries (China, Bangladesh, India, Cambodia, Vietnam, UK and Turkey). We’re proud of our achievements and we’re always looking for ways to improve. Whilst we may not always get it right, our priority is to make sure our work brings real benefits to workers.

In the following sections we’ll elaborate on our focus areas and highlight key projects under each objective.

Wages

Continually Improve Workers’ Lives and Livelihoods

In aiming to improve workers’ lives and livelihoods we’ve identified that improving wages and careers prospects is central to achieving our aims. Research shows that higher wages are important but so is the financial literacy and security of the wage. Even where wages meet a country’s minimum, they may not keep up with the pace and living costs of the everyday needs of workers. This can then be worsened by the underpayment of overtime in factories. We’re addressing these areas both within and beyond the factory walls.

To achieve a fair wage, a joint approach is vital. All relevant stakeholders must work together and assume their respective responsibilities to push forward this agenda. In particular this includes brands, retailers, suppliers, manufacturers, business associations, trade unions, governments, NGOs and multi-stakeholder supply chain initiatives. We believe that for the change to be sustainable we also need the buy in of the local stakeholders. As we see it industry-wide collective bargaining agreements are preferable actions as these industry-wide solutions ensure a fair competitive environment. Within this context we can see that to achieve higher wages an incremental approach must be adopted.

We have real evidence of significant wage increases that are reaching workers’ pockets as a result of our projects. We’ve led development of collaborations such as the Benefits for Business and Workers programme (BBW). Our pilot work on developing new productivity, quality and HR methodologies to transform workplaces formed the foundation of the BBW methodology. This has attracted the support of Impact, 15 brands, one venture capital fund, the BGMEA, Oxfam and DFID through its RAGS, TGVCI and BIF funds. BBW itself has worked in more than 300 factories in India, Bangladesh and Myanmar.

In China we’ve supported 45 factories to build wage and hours records and analysis systems, enabling us to set wage benchmarks for the coming year. We’ve collected data and carried out an in-depth analysis of average pay and hourly pay against the Asia Floor Wage (AFW) and local minimum wage. We used this to establish a wages benchmark and a long term strategy roadmap. The findings were as follows:

Average monthly wage summary:
• 42% (19 factories) of factories’ average monthly wages were higher than AFW.
• 71% (32 factories) of factories’ wages were higher than AFW for 10 months of the year.

Average hourly wage summary:
• 93% (42 factories) of factories’ average hourly wage was higher than the local minimum hourly rate.
• 9% (4 factories) of factories’ average hourly rate was higher than the Asia Floor Hourly Wage in each month.
• 16% (7 factories) of factories’ average hourly rate in 10 months was higher than the AFW.
• In FY14-15, 8 factories have increased the average wage per hour. Among them, the increased ratio is between 2% and 58%.

It requires high-level commitment, sustained effort over time and expertise to continually improve wages in the long-term. Though we’ve seen many achievements, we’ll continue to seek and play an active role in supporting industry wide initiatives and expand wage improvement projects. Our associated case studies provide further information on our work in financial inclusion.
**Case Study**

**Financial Inclusion Programme**

**Context**
Having access to a bank account is a privilege not everybody has. 60% of the population in India and 78% of Bangladesh’s[1] don’t have access to those privileges, accounting for nearly 900 million people. Improving financial literacy among low-income workers not only puts in place a transparent system of wage monitoring and control, but also a secure delivery mechanism, allowing workers to manage their savings. At New Look, we believe the importance of improving wages across the industry, but also support wage management systems and the required training needed to help workers thrive with their personal finances.

**Approach**
As part of our Financial Inclusion Programme, we’re the first brand to establish a pioneering two-year partnership with India’s social enterprise Geosansar to deliver financial education and training to garment workers. The overall purpose is not only improved wages, but the understanding of basic financial topics (from opening a savings account or using a credit card to financial advice). Geosansar’s programme is divided into five different modules conducted by in-house trainers in the local language with sessions of up to 60 people. Training tools comprise animated videos, animated PowerPoint presentations, posters, picture cards, role play and group discussions, live demos, written tests and handouts.

We’ve partnered with Alliance HR in the UK and BRAC Bank in Bangladesh to host an extensive programme of meetings and workshops to explain the tangible benefits of financial inclusion. Training was necessary as managers and workers showed some hesitancy to adopt these new systems due to their lack of familiarity.

**Impact**
These projects have clearly had a positive impact on workers.
- In India, 2,417 workers across 12 factories have been trained, of which 1,965 have opened bank accounts. The project has now moved to the second stage, involving further factories to reach more people. Additionally, factory management have opened banking kiosks in all factories and are expanding the approach to other locations.
- In Bangladesh, one of our factories has helped 300 workers to successfully open bank accounts, leading to the full rollout to the rest of the 2,100 workers at the premises.
- In the UK, eight factories (1,384 workers) have already switched to paying wages by bank transfer, reducing the time spent on payroll administration and avoiding the security concern of handling cash. Workers are now able to budget, pay bills or build a credit history more easily.

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“I didn’t have a savings account before because I could not submit the required documents, nor maintain the required minimum balance. With Geosansar I opened one with very few documents and withdrew my last month salary using a biometric device located at the factory.”

Javed Khan - Indian factory worker
Workers’ Voice
Empower people in factories to raise and resolve issues

As we feel this is such an important part of our programme, we’ve integrated it within our policy which all suppliers sign up to. The information within the policy clearly sets out our requirements and provides a self-assessment form, which enables factories to understand to what extent they meet our requirements of Freedom of Association and Collective Bargaining.

Although we encourage workers to speak up we’re aware that sometimes the root cause of this issue is deeper. From our research we’ve seen that workers don’t speak up due to a lack of communication pathway and also due to the fact they don’t feel empowered to do so. We’ve identified that workers may not understand or be aware of their rights and responsibilities at their workplace. For us to empower the workers within their factories we run training on labour rights. Industry wide we’ve focused on projects to encourage Freedom of Association and democratically elected worker committees.

New Look, along with other brands, worked with IndustriAll and Cambodian trade unions to advocate for a fair wage setting process and its regular review (inclusive of all stakeholders in the garment industry).

Our case studies for this area provide further information on our highlighted project.

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<th>2013/2014</th>
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<tr>
<td>Deliver trainings and projects on worker awareness and labour rights</td>
<td>117 factories</td>
<td>131 factories</td>
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Case Study
Freedom of Association in Turkey

We place workers’ voice at the centre of our work. Workers in many parts of the world aren’t able to represent themselves, bargain with their employers or see their issues and grievances resolved. Raising awareness is an important first step for us to approach this issue. We’ve focused our efforts to set up helplines in various sourcing countries to allow workers to raise their concerns. This in turn encourages relevant people to address and find ways to resolve the issue. We address 100% of workers’ queries and are proud for doing so.

As context, Freedom of Association (FOA) is a challenging topic in Turkey. Whilst trade union rights are included in the constitution, Turkish law doesn’t currently comply with fundamental ILO conventions on FOA as there are large numbers of exceptions which have a detrimental impact upon the ability of Turkish trade unions to operate effectively. Any legislation that can be used to protect trade unions and their members is usually poorly enforced. All New Look suppliers formally commit to working towards our requirements of FOA and collective bargaining.

Approach
As the first step towards building stronger FOA within our Turkish supply base, we wanted to start tackling the root causes of the issues faced by our suppliers and identify practical steps to begin to strengthen worker committees. We chose Impactt as our partner. The aim of the project was to create working examples of worker-management communications mechanisms and identify the key ingredients for success. The project was divided in two phases:

1. Group training: Divided between management training and worker representative training, 44 participants from 21 factories attended.
2. Practical implementation: Five of the 8 factories invited to the second stage completed the programme where we started with initial visits and telephone support plus a final follow up visit to each factory.

Impact
We had to understand that many factories in Turkey are openly hostile to the idea of FOA and collective organisation of workers. So, we had to take that into account in order to begin the implementation of the programme. We identified the following success factors:

- Training for worker representatives is particularly important. According to the feedback received, workers felt empowered through the learning process and many demonstrated the hunger to continue the learning, feeling more confident in their role.
- Changing the mindset of management. New procedures were implemented most successfully in those factories where management demonstrated a greater openness to the idea of worker-management communication.

While no effective and efficient worker committees were seen, we’re happy with the amount we learnt. Further programmes can be implemented using the outcomes of this project.

“…”

Factory worker
Gender

Around the world, a vast majority of garment workers are women, however there aren’t policies or resources within factories to reflect this. For us, gender empowerment is about equality. We facilitate conversations within the factories to better understand the impact of subconscious and conscious bias in the various countries we source from.

We understand that gender empowerment and equality are complex in the way the concerns manifest themselves in the various countries we source from, as it’s connected to deep routed social, religious, economical and historical influences of the region. For New Look to enable a positive impact we take into account and respect the local beliefs while facilitating conversations that promote equality.

One of the areas we’ve looked at is how we can transform the way women are treated in the workplace. We’ve implemented training initiatives and education programs to build on women’s leadership skills. Please see the case studies for further information.

One more important issue affecting the garment industry is the existence of poor health awareness and access to health care services. We feel very strongly about promoting greater awareness and understanding of women’s health issues through education.

In China and Vietnam, we’re working with Business for Social Responsibility (BSR) to implement the HER project to increase women’s health awareness and access to health services through sustainable workplace programs. The targeted factories for the programs were selected as more than 70% of the workforce is female.

The programme uses a peer education model to train women in factories to become Peer Health Educators (PHEs) and deliver training to increase awareness of women’s health topics and facilitate better access to health services.

In China, we’ve trained 537 women with a total of 24 appointed PHEs. In our analysis we’ve also noted that 67% of surveyed women at the end-line (versus 9% at the base-line) claimed they learned female health information from factory outreach activities. 56% of them reported having more power over decision making on health subjects at home, and 57% were confident in talking about their rights with mid-level management. Female line workers told our trainer that the training provided has improved their confidence, strengthened their sense of responsibility and helped line workers know and protect themselves better.

Our HER project in Vietnam is on-going at a factory with 380 women. We look forward to including an update on the results in next year’s report.

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<tr>
<td>Deliver specialist projects on women empowerment</td>
<td>15 factories</td>
<td>38 factories</td>
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Health & Safety

Health and safety (H&S) is a fundamental requirement within our ethical aims. Globally, research has identified that health and safety is a concern in the garment production sector. In the past year we’ve focused our efforts in Bangladesh, where health and safety are our greatest concerns. Our team in Bangladesh builds close relationships with key suppliers and are on hand to support them with implementation of H&S standards.

Some of the non-compliances that are identified are easy to fix however others are much more complex. Our approach to H&S varies on the particular issue we’re addressing. H&S standards are a minimum requirement for a factory to supply to New Look. Our policy sets our standards and provides resources for suppliers to meet them.

This year, we’ve rolled out projects and supplier trainings to over 291 factories across seven countries. Please see our case study for health and safety within Bangladesh. Whilst our efforts have focused on Bangladesh, we’ve worked across our global supply chain. For example in China, where:

- 57 factories have made improvements on H&S
- 40 factories have rectified 70% of H&S issues
- 30 factories have rectified 100% of H&S issues

Case Study

Women’s empowerment

We should continue this kind of activities, otherwise people will easily forget.

Production Manager
China factory

“...”

Context
Women make up the vast majority of the world’s garment workers. In Cambodia, China and Vietnam the percentage of women working in the garment industry is 90%, 80% and 81% respectively. Yet, a little proportion of them seem to progress to supervisory or management roles. At New Look, we’re aware of cultural challenges with regard to discrimination in garment factories on the basis of gender, religion, education, or marital status among other things. Therefore, we take into consideration underlying cultural factors to bring about positive change and empower women workers.

Approach
New Look’s concerns over gender discrimination prompted us to deliver a project that would focus on evolving existing perceptions of mid-level management who particularly discriminated female workers on the factory floor. Starting in 2013, this ongoing project aims at empowering workers to raise and resolve issues as well as improving factory management skills and systems. Our local CSR Teams work on factory selection process and collaborate with local NGOs (Nari Udyog Kendra in Bangladesh) to finalise the content and training material. Once the project has been delivered, our local team follows up regularly to ensure the long term prosperity of the systems in place. These leadership training and workshops aren’t only aimed at female workers but to the workforce as a whole, with the objective of developing awareness and creating dialogue between management and workers about the benefits of equality and gender empowerment in factories.

Impact
Following the delivery of the project, the factory established a new gender based equal opportunity policy with the promotion of two women to supervisory positions on each floor. The factory went from having only three female supervisors to having 13 at the end of the project (a 333% increase).

As a consequence, the atmosphere of the factory has changed positively. Female employees feel more confident and worker-supervisor relationships have improved. The behaviour of male supervisors has also seen a radical change. This has, in turn, encouraged women to apply for internal promotions. We saw a reduction of worker absenteeism combined with an increase in productivity.

Commitment

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<th>2013/2014</th>
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<td>Work with factories to deliver healthier and safer environment</td>
<td>275 factories</td>
<td>291 factories</td>
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Better Work
ILO and ADB
BSR
Just-Style
Case Study

Health and Safety in Bangladesh

Context
Bangladesh is one of our top five sourcing countries. We work closely with our suppliers and factories to make sure those who make our products work in a safe environment. Our audits identify that health and safety remains the most common issue across our supply base. New Look’s commitment to improving the working conditions of garment workers is strengthened through the joint efforts of the Accord, which is now entering a post-audit phase of remediation facing new challenges, such as technical expertise, awareness of structural and fire safety mechanisms, or the availability of the necessary safety equipment among others.

Approach
Fire and structural safety is a crucial requirement for all the factories that supply New Look. We conducted factory inspections and implemented training policies before the Accord was set up. This joint initiative reinforced our work on the ground as well as the commitment of the industry, reaching a five-year legally binding agreement between retailers, trade unions and NGOs.

Our Senior CSR Manager sits on the Worker Participation Working Group, helping to develop provisions around compliant mechanisms, worker participation on health and safety committees and training programmes. We’ve made a commitment to continue sourcing in Bangladesh and support the change needed despite the challenges faced up until now.

In this second phase of the Accord, we actively support remediation procedures to help factories overcome the issues found in the technical inspections. The complex technicalities and expertise required to deliver these projects has led our local CSR team in Bangladesh to actively cooperate with the Accord engineers and factories.

New Look’s team assists factories in resolving and prioritising the issues found in Corrective Action Plans (CAP), coordinates communication between the Accord and factories (10 meetings have been facilitated so far), and provides fire training and monitoring according to the remediation needed, using our own resources or external agents.

We’re closely monitoring some of the key challenges affecting the speed at which factories undertakes remediation progress, such as the delay in the procurement of fire doors, concerns regarding the funding of remediation programmes, or the overbooking of the Detailed Engineering Assessment (DEA) firms among others.

Impact
100% of the 65 factories we work with in Bangladesh have been inspected. Compared to the initial assessment, 86% of our factories have successfully moved to a lower risk category. We’re proud of these achievements as we work closely with factories to resolve these issues. The main work has comprised the installation of fire doors, fire alarms, hydrants, sprinklers and essential retrofitting work in five of the factories.

In addition to continuing to support the Accord remediation, here are some of the most relevant statistics from our work with factories:

- 100% have now made sure that emergency exits are kept clear and open (from a previous 78%).
- 99% of factories have an approved building plan (from a previous 49%).
- 80% have rectified electrical risk issues.
- 95% now have fire wardens (from a previous 54%).
- 13% remediation has been completed, 43% is pending verification and 45% of work is in progress.

Workers feel more comfortable knowing that their factories are undertaking essential changes to guarantee their safety at work.

This is a good initiative as I didn’t know the red (high risk) grading of my factory until the Accord assessment was completed. I have started working on the issues highlighted during the Detailed Engineering Assessment (DEA) visit.

Mr. Faisal Samad,
Managing Director - Surma Garments
Transparency

Build trust, transparency and shared responsibility along the supply chain

Building trust, transparency and shared responsibility along our supply chain is a key part of our programme. We believe this is the vital baseline we need to achieve impact with our ethical trading programme.

We have long-term relationships with our suppliers. The average length of relationship has increased by 18% from 1874 days (5 years 2 months) to 2218 days (6 years 1 month) in the past year. We’ve been working with some of our key suppliers for over 40 years. The length of our relationships means that suppliers understand our ethical requirements and work together with our team to ensure long-term improvements for their workers.

We use an ethical scorecard for our top 24 suppliers, responsible for 84% of our intake value last year. Suppliers are evaluated on their ethical performance alongside quality, on-time delivery and commercial measures. They use the following score matrix:

<table>
<thead>
<tr>
<th>Level</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>0</td>
<td>Not fulfilling our basic ethical requirements</td>
</tr>
<tr>
<td>1</td>
<td>Working towards our basic ethical requirements</td>
</tr>
<tr>
<td>2</td>
<td>Fulfilling our basic ethical requirements</td>
</tr>
<tr>
<td>3</td>
<td>Demonstrating actions that go beyond our basic ethical requirements</td>
</tr>
<tr>
<td>4</td>
<td>Significant investment in ethical trade</td>
</tr>
</tbody>
</table>

To achieve a maximum Level 4, suppliers must have an ethical trading policy, a dedicated ethical trading manager and be working actively on projects that benefit workers. Some of the examples of these projects include providing a housing fund for workers, or liaising with Trade Unions in Vietnam to arrange events for workers.

The Sourcing Team discusses the ethical scorecard and their progress against KPIs with all the Heads of Buying at New Look and each supplier to identify areas for further improvement and support.

We’re also rolling out a factory scorecard, which measures key indicators across 100% of Bangladeshi factories. We’ve committed to supporting factories to reduce their risk rating against the benchmark to meet our standards or we’ll stop the sourcing relationship.

<table>
<thead>
<tr>
<th>Commitment</th>
<th>2013/2014</th>
<th>2014/2015</th>
</tr>
</thead>
<tbody>
<tr>
<td>Factory improvement programme</td>
<td>260 visits</td>
<td>517 visits</td>
</tr>
</tbody>
</table>

+99%
Overview

Supply chain mapping

Knowing our supply chain is important for us. Mapping our suppliers, factories and their suppliers is a task of enormous proportions. A second tier of fabric mills, dye plants and other workplaces need to be identified in order to begin our engagement process.

The Modern Slavery Act in the UK sets out a strengthened legislative framework for tackling modern slavery, adding meaning to the work we do. The transparency in supply chains provision requires businesses to produce a slavery and human trafficking statement, setting out what they do to ensure there’s no slavery or human trafficking in their supply chain.

We’re engaging with our suppliers to make sure all second-tier workplaces are mapped in order to build a robust new authorisation process. We’re working towards mapping out the cotton we use in our products, the jewellery we make and also the home workers in India. We also collaborate with the Better Mills Initiative, which focuses on improving the textile wet processing industry in China.

Achievements from all the initiatives and projects in which New Look is taking part will be made available in future reports.
Case Study

Fast Forward

Context
The garment manufacturing industry in the UK poses an important challenge when subcontracting. Factories in the UK tend to be very small units who pass the work between each other in an informal subcontracting network. Understanding what goes on all the way down our supply chain and making sure not only our suppliers but also their suppliers respect labour standards is an important challenge for us.

Factories face an environment dominated by the lack of management systems, with a shortage of trained manpower to keep accurate records, a struggle with cost calculation processes or simply the lack of knowledge about national laws. Therefore, the existing audit systems in the industry make it difficult to verify the truth behind the records.

Approach
Transparency along the supply chain is essential to ensure all tiers of our supply chain understand and meet our requirements. 18 months before ETI’s report was published about the garment industry in the UK, we identified the need for a project to improve our supply base in the UK, and proposed a new system for the industry: Fast Forward.

We partnered with Alliance HR (part of Gangmasters Licensing Authority) to develop a programme to drive full compliance with all legal requirements, and also combined with our ethical objectives, setting a new standard for the industry to follow. We also wanted to help factories build better systems and practices to achieve great accuracy (from production cost calculation to payroll processing). We invited other high street retailers to join, as we believe more brands adopting this system will bring about an industry wide change. Three other retailers have adopted the Fast Forward methodology so far.

In order to develop the project, a series of 9 workshops, meetings, live scenarios, audits, consultation with workers and engagement with third party accountants were put in place. Workshops were attended by 250 representatives from the industry and the changes proposed were brought in for the first time in the industry. As a result, an effective audit process was devised to rate and monitor factories and their progress.

Impact
We’ve seen great progress regarding safety compliance and had some positive feedback from workers about their paying conditions. Fast Forward has improved recording systems and set up the necessary methods to better understand production costs. Factories now have the ability to check workers’ right to work documents to avoid potential fines, having a better control of the premises.

We’re aware of the challenges of the industry and the fact that Fast Forward is still in its infancy. For that reason, we set up this project on an ongoing basis as there’s still much improvement to be achieved. Some initial examples of individual factory improvements are:

• Weekly increase in wages of £61.49 per worker in one factory.
• Right to work check implemented in 100% of workers in another factory.
• Another factory established a worker committee.
• 100% of salaries of another factory are now paid through bank transfer improving record keeping.

I first met Subathra following a Stronger Together presentation I gave at the Migrant Help conference in July 2013. We discussed Stronger Together which helps businesses to tackle modern slavery and forced labour in supply chains. A visit to a Leicester manufacturing operation followed and a commitment forged to work together to improve labour standards compliance in UK manufacturing supply. The Fast Forward programme was born!

David Camp - Alliance HR
Shared Responsibility

Make sure our team and suppliers share the responsibility in delivering the ethical trade strategy

Overview

Ethical Champions

As well as improving relationships we work to encourage an environment consisting of shared responsibility. We’d like to see shared responsibility between our team, our company, our suppliers and other stakeholders to deliver our ethical trade programme.

We’ve focused within our company to make sure our CSR objectives are at the core of our business. We believe this also reflects the shared responsibility we hope to achieve. Following this we introduced the New Look Ethical Champions programme. These are self-elected New Look staff members from various Buying, Merchandising and Design teams who meet regularly to address CSR objectives. This past year, for the first time, Ethical Champions were involved in the shaping and rebranding of the CSR strategy.

Some of the other key areas of focus in the last one year for the programme have included:

1. Increasing understanding and awareness of ethical trade for New Look suppliers and across New Look buyers, merchandisers and designers
2. Bringing ethical changes in internal behaviour to build momentum and commitment to ensure long-lasting change
3. Ensuring suppliers and factories see that buyers prioritise ethical and build supplier responsibility on this

We believe that increasing awareness and understanding within our business will help us achieve our CSR aims. We view the Ethical Champions programme as a long term project and are happy with the outcomes so far.
Environment

As our business continues to grow we’re working to make sure our resulting potential impact on the environment isn’t only minimised but removed. Our approach aims to combine sufficient research, new technologies, innovative thinking and communication to create solutions that benefit the environment while meeting the needs of our customers and supporting our suppliers. Over the years, we’ve championed good-practice policies which we’re proud of, however we have a long way to go.
Our Approach

Having incorporated environmental issues into our CSR strategy, we’d like to be bolder and much braver in inspiring conservation of energy and resources, reduction in waste, and containment of emissions wherever in the world our products are made. We’d like to inspire a proactive approach to environmental management across our global supply chain.

As we can’t do this alone, we’ve created partnerships with carefully selected factories, suppliers and organisations to strengthen our environmental focus. This includes suppliers, other brands, the International Finance Corporation (IFC) and Camstone as well as other experts, NGOs and various government initiatives around the world.

Over time, we hope every factory handling production for us will far exceed the basic provisions of our code. We think it’s right that factories should take responsibility for managing their own environmental impact, recording all energy consumption and a written strategy with clearly defined targets. We’re committed to providing support to help build momentum towards achieving our longer-term environmental goals.

Our approach

At New Look we recognise that different parts of our supply chain face different sets of environmental challenges. We take a pragmatic approach to make sure we focus our efforts on the areas that’ll have the biggest impacts first. Our projects aim to produce clear case studies depicting lower environmental impacts, including targets and obtain permits that comply with national laws.

A number of these are local laws, however within our Environment Standards we encourage our supply chain to go beyond the minimum requirements. We see our Environment Standards as the minimum threshold required for a supplier to take part in the production of any New Look product.

To encourage this we expect suppliers to:

1. Have a written plan for managing environmental impacts, including targets
2. Measure and track their environmental impacts
3. Establish responsibilities for environmental management
4. Take practical steps to reduce their environmental impacts

The Environment Standards also include due diligence so that we can verify compliance. Although we set these standards for every supplier to sign up, we understand that we can’t just pass the responsibility along the chain. Alongside our Environment Standards we’ve completed a number of projects to help suppliers meet our requirements.

We’ve introduced an Environmental Scorecard for our factories. To begin this process we first identify high risk suppliers based on the type of product, the manufacturing process involved and their location. We don’t want to increase the burden on our suppliers so we’ve chosen this selection process to target only those who need to take part. Following this, the in-country CSR specialists will visit the sites and assess their performance using the New Look Environmental Scorecard. This involves collecting quantitative data such as fuel, water, raw materials, chemicals and waste that’s used or produced by the factory. The qualitative data is also taken into consideration and collected using a questionnaire to provide a better picture of the factory.

The collected information is analysed by the team and feedback is sent back to the factory in an Environmental Benchmark Report. This report shows how they perform compared to their peers and where their standards are in comparison to New Look expectations. We carefully produce this report to include relevant and achievable information, so that it can serve as guidance on what they can do to improve their score. Further to this, follow up conversations are held with the factory management to monitor progress and give further guidance and support to those who need it.

In Bangladesh we’re part-funding our suppliers to participate in the International Finance Corporation’s (IFC) Cleaner Production Programme. Please see more information within the case study.

We’ve also signed the Sustainable Clothing Action Plan, which is a voluntary industry agreement to achieve the following by 2020:

- 15% reduction in carbon
- 15% reduction in water
- 3.5% reduction in waste
- 15% reduction in waste to landfill

These are ambitious targets and require a proactive and forward-thinking approach for us to achieve them. Although we’ve a long way to go we’re happy with the outcomes of our work from last year. Within this time, we’ve reduced carbon emissions by 14% compared with the previous year. We’ve also recycled 71% of all waste from our UK stores, this is up from 64% the previous year.

Our drive to reduce our environmental footprint reaches beyond the first tier of our supply chain, including dye works, fabric mills and other workplaces. During the past year, we piloted a Better Mills initiative in China designed to inspire new standards.

Bringing environmental awareness under our CSR umbrella has also encouraged us to build a ‘green’ dimension into other factory-focused initiatives. In China, our far-reaching Responsible Factory project combined a drive for greater energy efficiency and increased awareness of environmental impact with improvements in leadership, systems and
Environment continued

workplace safety.
The project was originally set up as labour and raw material costs were rising and factories needed to adapt to cope by increasing efficiency and using waste more efficiently. To tackle this we engaged with suppliers to get them on board. We delivered training and technical expertise to drive improvements in their standards, systems and practices. From our research we identified that this helped encourage transparency as various people will benefit from the lessons along the way. We noted that commitment varied as the participating factories had differing objectives and aspirations, and there was general concern about potential disruption to production that some elements.

We therefore had to adjust the original timeline. However, energy efficiency improved with participating factories achieving substantial year-on-year savings in energy consumption and water usage.

Levels of commitment and delivery varied, but the factory that demonstrated the strongest commitment derived the greatest benefits – achieving a clear competitive edge that should inspire other factories to pursue good practice. The project’s breadth of approach delivered important knowledge for everyone.

Cost savings were achieved through driving down resource usage and energy consumption strongly supported our argument that the drive towards more responsible and sustainable practices makes great business sense.

**Case Study**

**Cleaner Production Bangladesh**

**Recommendations set by PaCT experts helped us immensely to be better at thermal efficiency compared to our past days. HAMS Garments Ltd. are happy with PaCT to be able to make a positive turnaround in terms of power and cost savings**

Chairman
HAMS Garments Ltd

**Context**
The wet processing sector in Bangladesh is known for its excessive and wasteful energy use. Common misuse of energy found at these premises include the inefficient use of thermal energy, irregular monitoring of boiler-burner combustion, excessive boiler blow-down, loss of heat in processing wastewater or poor steam pipes insulation. There’s a lack of awareness of how to upkeep plants and machinery and also about the impact of unlimited emissions. Cost savings improvements in thermal efficiency are possible in almost every washing-dyeing-finishing textile factory. Free or low cost solutions can reduce energy bills by 5-25% and lower CO2 emissions.

**Approach**
Cleaner Production is an integrated strategy to maximise profits by making more efficient use of inputs while maintaining or increasing production and minimising waste and pollution at source. We’ve collaborated with the Bangladesh Water PaCT, a programme with the objective of bringing about environmental change that supports textile wet processing factories in adopting cleaner production practices.

We put forward three of our factories to enter this programme as they needed technical expertise to devise and implement energy-efficient initiatives. One factory, HAMS Garments Ltd., has already seen the benefits of these initiatives. With an average production of 13 tons of finished fabric per day, the main challenge was to identify thermal efficiency improvements within the factory required analysis by skilled CP engineers. Once HAMS Team and PaCT experts identified areas of potential improvement, several opportunities to reduce waste heat and conserve energy were encountered. For this project, we partnered with the International Finance Corporation (IFC)

**Impact**
Out of the 33 free and low cost projects that were recommended by PaCT experts, HAMS implemented 18 of these measures investing a total of US $101,798. These changes saved the company a total of US $192,730 (nearly doubling the initial investment) with a payback period of about six months. HAMS reduced gas bills by an average of US $1,300 per month as well as increase efficiency in several processes.

We’re continuing the follow-up of the remaining two factories and will have more details in our next year report.
Animal Welfare

In the production of some of our products, materials such as leather and suede are used. We’re committed to sourcing these animal derived materials in a way where animals are treated with the respect and decency they deserve. We consider it unacceptable to cause suffering in the process of manufacture of our products.
Our Approach

Since last year, we’ve worked hard to update our management of animal welfare. Our updated animal welfare programme now falls as one of the three CSR pillars. Moving forward, we’re working harder than ever to understand and address the challenges, identify concerns, and increase transparency.

We’re committed to addressing this and join in a collaborative way with industry experts to make sure best practices are embedded in our supply chain. To implement our animal welfare approach we’ve developed the New Look Animal Welfare and Animal Protection Policy, which every supplier must sign. This policy sets out strict guidance on our requirements. The policy explains that our suppliers must only source animal derived material from farms with good animal husbandry. This means that animals have:

- Freedom from hunger and thirst
- Freedom from discomfort
- Freedom from pain, injury or disease
- Freedom to express normal behaviour
- Freedom from fear and distress

The policy highlights that using some animal materials is unacceptable in any measure and, as a result, we’ve banned the use of animal fur, endangered species, Karakul, leather or skin products from exotic and wild caught animals, Mongolian lamb’s fur, Australian Merino wool and Angora.

Our approach

Our approach to animal welfare must be focused on transparency and partnering to achieve our aims. This begins with the previously discussed Animal Welfare and Animal Protection Policy.

To achieve the aims of our policy we believe that transparency is vital. We're working to map our supply chain so that we can see every step from the very beginning to the end of the production process of the product. In doing this we can identify where animal welfare issues are present and we can then share the responsibility of addressing them.

Before our suppliers can begin production they must complete an animal welfare form containing information such as animal species and country of origin. This must be fully completed and once it’s submitted, the CSR Team will review the information. We also include testing for species identification to validate the information we receive. This is done by both New Look and suppliers; for example all accessories are tested by New Look.

Our approach has also included a great deal of education and raising awareness for this issue. Over the past year our focus has been on our internal buyers and technologists. We’ve educated them to increase their awareness and encourage their own commitment to the subject. Following this we’ve trained them to make sure they can ask the right questions and validate information and responses received to check compliance against our animal welfare policy.

At times we understand that there are instances where a supplier does not uphold our animal welfare policy. Where this has occurred, we’ve acted swiftly and decisively in dealing with the issue and rectifying the situation in a robust way. We also provide further support in the form of follow up visits from our CSR Team.

Over the past year we’ve worked on a number of projects within the animal welfare section. One such project has looked at where our suppliers source the duck down used in padded jackets and as part of this we’ve tracked exactly how it’s produced. Following this, our BMD (Buying Merchandising and Design) Teams have previously restricted their intake of down-filled products to one supplier with production at just two garment factories (both in China), which in turn relied on two processing plants to meet all their duck down requirements. We engaged with the supplier and factories so that we could identify and visit not only the processing plants but the slaughter houses, duck farms and hatcheries too.

We’ll also continue tracking and mapping each stage in the production and processing of other animal-derived materials and products. We promise to be open and honest about what we find and what we do or don’t achieve.
Key Learnings

Key Learnings from 2014/2015

We’re consistently evaluating our work and improving our approach to CSR. We want to learn from our experiences and build on them each year. Over the past year we’ve identified some key lessons:

• Health & safety is and will be our key focus especially in Bangladesh
• Women empowerment is an important area, as it has a direct impact on workers’ lives and livelihoods
• Working closely with our Buying Team to make sure CSR is integrated in their approach is essential
• Collaborating with different stakeholders in key projects maximises project impact
• Working closely with our suppliers and factories in order to build stronger relationships

Looking Ahead at the Coming Year

Using our circular feedback mechanism to continually learn and adapt, we work to have the best possible approach for each issue within each region. Following this rationale, we’ve carefully evaluated our approach and designed our new strategy for the coming year.

One of our most ambitious and key outcomes of the strategy is its rebranding to the more integrated concept of CSR. The inclusion of animal welfare and environmental sections will have their own set objectives in the coming years. Furthermore, as our CSR team continues to grow, so does the buy-in from not only senior management, but each individual within the company.

Some of our key priorities for next year include:

• The production of animal welfare and environment objectives.
• The movement from set year objectives to a year-on-year reporting approach, so we can better track our progress in the long term.
• Continue to integrate CSR throughout the company and further increase the impact of each employee on the global strategy.

• Working closely with buyers and suppliers to create a focused approach within the supply chain to build on existing and creating new relationships.
• Focusing on strategically important factories to make the most of existing relationships.
• Better use of internal and external research to improve our knowledge base in order to identify the best approach for the implementation of key projects in countries with diverse economic, social and environmental values.

Incorporating animal welfare and environmental issues within a rebranded CSR strategy has been an important step for us. We’re now in a better position to engage in new projects and partnerships within our clearly defined CSR scope. This provides us with the strength required to achieve our objectives and set out ambitious targets for the future. As we progress in the right direction we’re excited about the next stage and look forward to elaborating on our future success in upcoming reports.
Appendix
New Look CSR Aims

New Look’s CSR Aims represent the ethical and environmental standards used as a framework when conducting our business. Suppliers, agents, factories and units producing for New Look show commitment to work toward achieving these standards. If an employee feels they are unable to resolve an issue through existing procedure, they should be able to contact New Look’s CSR Department on ethical.support@newlook.com.

The provisions of this code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Failure to meet our ethical aims may result in termination of the business relationship and the cancellation of all outstanding and future New Look orders at our discretion, without liability to New Look.
New Look Ethical Aims

Based on the Ethical Trading Initiative Base Code

1. Employment is freely chosen
   1.1 There’s no forced, bonded or involuntary prison labour.
   1.2 Workers aren’t required to lodge “deposits” or their identity papers with their employer and are free to leave their employer after reasonable notice.

2. Freedom of association and the right to collective bargaining are respected
   2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
   2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
   2.3 Workers representatives aren’t discriminated against and have access to carry out their representative functions in the workplace.
   2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates and does not hinder, the development of parallel means for independent and free association and bargaining.

3. Working conditions are safe and hygienic
   3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
   3.2 Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
   3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
   3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
   3.5 The company observing the code shall assign responsibility for health and safety to a senior management representative.

4. Child labour shall not be used
   4.1 There shall be no new recruitment of child labour (under the age of 15).
   4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.
   4.3 Young persons (under the age of 18) shall not be employed at night or in hazardous conditions.
   4.4 These policies and procedures shall conform to the provisions of the relevant ILO standards.

5. Living wages are paid
   5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
   5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
   5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

6. Working hours aren’t excessive
   6.1 Working hours comply with national laws and benchmark industry standards, whichever affords greater protection.
   6.2 In any event, workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every seven day period on average. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate.

7. No discrimination is practised
   7.1 There’s no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
   7.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there’s no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

8. Regular employment is provided
   8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
   8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there’s no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

9. No harsh or inhumane treatment is allowed
   9.1 Physical abuse or discipline, the threat of physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.
**New Look Environment Standards**

Based on international industry standards, most are included in local law.

The following standards constitute MINIMUM standards, not MAXIMUM standards, and shouldn’t be used to prevent companies from exceeding these standards. They’re divided under seven distinct topic headings: energy, water, hazardous substances, raw materials, air emissions, wastewater, and solid waste.

We expect all entities that take part in the manufacturing and finishing of New Look products to:

- Have a written plan for managing environmental impacts, with targets
- Measure and track their environmental impacts
- Create organizational responsibility for environmental management
- Take practical steps to reduce their environmental impacts

### 1 ENERGY

1.1 Continuously measure, record and track the amount of electricity, gas, and fuel used onsite, including for transportation, from all sources, including any on-site generation.

1.2 Set targets to energy consumption and start a programme to achieve the reduction.

1.3 Carry out projects to reduce the site’s consumption of energy.

### 2 WATER

2.1 Continuously measure, record and track the amount of water used onsite, for both domestic and industrial processes, and from all sources – municipal mains, groundwater (boreholes and wells), and surface water (rivers, lakes).

2.2 Get permits and licenses required by local and national law and have test results on-site to demonstrate legal compliance.

2.3 Set targets to reduce water consumption and start a programme to achieve the reduction.

2.4 Carry out projects to reduce the site’s consumption of water.

### 3 HAZARDOUS SUBSTANCES

3.1 Continuously measure, record and track the use of hazardous substances.

3.2 Keep an inventory of hazardous substances used, handled, transported and stored onsite, including their quantities and where they’ve been bought from.

3.3 Make sure Material Safety Data Sheets (MSDSs) are available in the local language for all hazardous substances used onsite.

3.4 Make sure control measures are in place to prevent workers from being exposed to hazardous substances and to prevent them contaminating the environment. This should include: training for workers who handle hazardous chemicals on how to do so safely, and clear labelling of all hazardous chemical containers and storage in secure areas with spill prevention/secondary containment vessels. Chemicals should never be poured directly into the ground or washed directly into surface water.

3.5 Communicate emergency procedures to workers and follow them in the event of a spill or release.

3.6 Make sure that all chemicals used in the manufacturing of New Look’s products comply with New Look’s Restricted Substances List.

3.7 Take steps to reduce the use of hazardous substances and replace them with safer alternatives. Where possible, use bio-degradable chemicals if they meet the same technical performance requirements.

### 4 RAW MATERIALS

4.1 Trace raw materials and keep appropriate records to show this. For man-made materials this should be back to the final production process location, for natural raw materials (such as cotton) this should be back to the country in which they were harvested.

### 5 AIR EMISSIONS

5.1 Continuously measure, record and track emissions generated by onsite combustion and conduct periodic air quality testing to capture air quality on the factory floor.

5.2 Minimise, and as appropriate, treat before release, all emissions to air that have potential to adversely affect human health and/or the environment.

5.3 Obtain permits and licenses required by local and national law and have test results onsite to demonstrate legal compliance.

5.4 Set targets to reduce emissions to air and start a programme to achieve the reduction.

5.5 Keep a list of all air emissions points within the factory and which substances are emitted at each point.

5.6 Install air extraction devices in areas of the factory where fumes or particulates (including dust) are generated and can be inhaled by workers.

### 6 WASTEWATER

6.1 Treat all wastewater in a fully functioning effluent treatment plant (ETP) either on-site or in a shared ETP off-site before discharge.

6.2 Employ a trained individual, who understands the processing requirements and regulations for wastewater discharge, to operate any onsite ETP.

6.3 Measure, record and track wastewater volume and quality by collecting samples from the final discharge points.

6.4 On a monthly basis (or as required by the law, whichever is greater) measure: Oxygen Demand (COD), Biological Oxygen Demand (BOD), pH, temperature, colour, Total Suspended Solids (TSS), and Total Dissolved Solids (TDS), and specific metals.

6.5 Make sure that wastewater leaving the site meets the BSR Water Quality Guidelines which New Look supports and all applicable local and national laws.

6.6 Obtain permits and licenses required by local and national law and keep test results on file for at least 12 months to demonstrate compliance.

6.7 If discharging to a central ETP, have on file valid permits to do so, and test reports that show compliance with the central ETP’s requirements.

### 7 SOLID WASTE

7.1 Continuously measure, record and track the types and amount of solid waste produced by the factory. This should be done for all solid waste streams including: fabric, paper, plastic, general (domestic) and sewage sludge if there is onsite wastewater treatment, and any hazardous wastes.

7.2 Have systems in place to ensure the safe handling, movement, storage, recycling, reuse, or disposal of waste.

7.3 Set targets to reduce solid waste production and start a programme to achieve the reduction.

7.4 Make someone responsible for meeting these targets.

7.5 Consider reducing, re-using, and recycling for each waste stream.

7.6 Track the disposal route for each waste stream.

7.7 Obtain permits and waste receipts required by local and national law and keep them on file to demonstrate legal compliance.

7.8 Dispose of hazardous waste safely and legally using licensed waste contractors only.
New Look Animal Welfare Policy

Animal Welfare and Animal Protection Policy

We consider it unacceptable to harm animals in the process of manufacture of our products. All our suppliers must meet strict animal welfare requirements and ensure our animal welfare standards are maintained at all times.

Our suppliers must only source animal derived material from farms with good animal husbandry.1

Good animal husbandry means animals have:
1. Freedom from hunger and thirst by ready access to fresh water and a diet to maintain full health and vigour.
2. Freedom from discomfort by providing an appropriate environment including shelter and a comfortable resting area.
3. Freedom from pain, injury or disease by prevention or rapid diagnosis and treatment.
4. Freedom to express normal behaviour by providing sufficient space, proper facilities and company of the animal’s own kind.
5. Freedom from fear and distress by ensuring conditions and treatment which avoid mental suffering.

We believe that using some animal materials is unacceptable in any measure, and as a result, we never use the following in our products:

• Animal fur: This includes both farmed fur (e.g. fox, mink, sable) and fur which may be a by-product of the meat industry (e.g. rabbit).
• Endangered species: This is defined as those species which appear on the CITES (the Convention on International Trade in Endangered Species of Wild Fauna and Flora) or IUCN (International Union for Conservation of Nature) lists of endangered species. Information on these lists can be found at http://www.cites.org and http://www.iucnredlist.org respectively.
• Karakul: Or any leather or skin products that are the product of unnatural abortions. Sometimes called Astrakhan, Broadtail, Persian Lamb, Swakara or Krimmer.
• Leather or skin products from exotic and wild caught animals: New Look doesn’t accept the use of skins from wild-caught animals or real exotic animal skins, including but not limited to: reptile skins, snake, alligator, crocodile and lizard. New Look Retailers doesn’t accept the use of these materials in any of its products.
• Mongolian lambs fur: Due to the practices involved in the traditional methods of slaughter, we won’t use this sheepskin variety.
• Australian Merino wool: Due to the widespread practice of mulesing sheep in Australia we will not use Merino wool sourced from Australia.
• Angora: Due to the reported plucking methods used by some angora suppliers, we don’t accept any products containing angora.
• Feather/down: New Look only accepts down, feathers and decoration feathers which are a by-product of the meat industry, excluding the production of foiegras, and must come from farms with good animal husbandry as per our definition. We don’t accept feathers or down obtained from the live boiling, live plucking, endangered, exotic or wild-caught animals. All our down and feathers must be sterilised as per the EU standard EN 12935.
• Wool, including mohair and alpaca: New Look only uses wool originating from farms with good animal husbandry as per our definition. We’re strictly against the practice of mulesing and don’t accept wool from farms that expose the animal to suffering as a result of this practice.

We sometimes use the below listed animal materials in our products under the following conditions. When we do, we only work with suppliers which provide us with information that enables us to trace their supply chain down to the farms.

• Leather or skin Products: All leather used for New Look Retailers Ltd must be a by-product of the meat industry. It can never be obtained from live skinning or live boiling, or from aborted, exotic, wild-caught or endangered animals, and must come from farms with good animal husbandry as per our definition.
• Feather/down: New Look only accepts down, feathers and decoration feathers which are a by-product of the meat industry, excluding the production of foiegras, and must come from farms with good animal husbandry as per our definition. We don’t accept feathers or down obtained from the live boiling, live plucking, endangered, exotic or wild-caught animals. All our down and feathers must be sterilised as per the EU standard EN 12935.
• Sheepskin: New Look only uses sheepskin which is a by-product of the meat industry, excluding the production of foiegras, and must come from farms with good animal husbandry as per our definition. We don’t accept sheepskin obtained from the live boiling, live plucking, endangered, exotic or wild-caught animals. New Look follows recommendations on animal welfare set out by the World Organisation by Animal Health (OIE) in their Animal Health Codes and the Farm Animal Welfare Committee (FAWC) and their Five Freedoms. http://www.defra.gov.uk/fawc/about/five-freedoms/, http://www.oie.int/eng/en_index.htm

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Animal Testing Policy
Against Animal Testing

We believe that animal testing for cosmetic purposes is not acceptable. We recognise that customer safety is of paramount importance but that this can be assured without the use of animal testing. However, we may occasionally use in our cosmetic products ingredients which are animal derivatives but which may be collected without harm to animals.

- We won’t conduct, commission, or be party to any animal testing of cosmetic products or ingredients
- We won’t knowingly purchase ingredients, formulations or products from suppliers that have conducted, commissioned or been party to animal testing for cosmetics purposes on these products after the company’s fixed cut-off date. In order to verify supplier compliance with this policy, the company obtains written certificates of supplier assurance from each of their suppliers on an annual basis.