

NEW LOOK

Anti-slavery and Human Trafficking Policy and Remediation Plan

Definitions:

Modern Slavery	The exploitation of a person or group of people for commercial or personal gain.
Human Trafficking	The transportation or coercion of a person or group of people in order to benefit from their service or work.

Anti-Slavery and Human Trafficking Policy

Modern slavery is a crime and a violation of fundamental human rights. It takes a number of forms, including slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty in order to exploit them for personal or commercial gain.

New Look strongly condemns and prohibits any form of modern slavery within its supply chain. New Look are committed to:

- acting ethically and with integrity in all business dealings and relationships.
- implementing effective systems and controls to ensure modern slavery is not taking place anywhere in the business or supply chains; and
- ensuring there is transparency in the approach to tackling modern slavery throughout supply chains, consistent with the disclosure obligations under the Modern Slavery Act 2015.

Commitment to the Policy

This policy applies to every person working for or on behalf of New Look, including employees, suppliers, agents, contractors, external consultants, third-party representatives and business partners.

As a condition of working with New Look, all such persons or organisations who have their own employees, suppliers and subcontractors that make up the wider part of the supply chain, are required to make sure New Look standards are understood and met in their operations including prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude (whether adults or children) and New Look expect that contractors will hold their own suppliers to the same high standards.

The prevention, detection and reporting of modern slavery in any part of New Look's supply chains is the responsibility of all those working in the supply chain. Suppliers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

If it is believed or suspected that a conflict with this policy has occurred or may occur in the future, then Suppliers must notify New Look's Modern Slavery Officer at:
ModernSlaveryOfficer@NewLook.com.

New Look may terminate a relationship with other individuals and organisations working on their behalf if they breach this policy.

Specific Supplier Requirements

Reviewed 1.07.2026.

[INTERNAL]

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- **Freedom of Employment:** All workers will have the right to enter employment voluntarily and freely, without the threat of a financial penalty, violence, intimidation, or any other disadvantage.
- **Freedom of Movement:** Coercion will not be used to physically confine or imprison workers to the workplace or related premises, for example employer-operated residences. Mandatory residence in employer-operated residences must not be made a condition of employment. Practices such as confiscating or withholding worker identity documents or other valuable items (e.g., work permits and travel documentation) are prohibited.
- **Conditions relating to Skills, Development & Vocational Training:** Training offered to workers must be undertaken voluntarily. Employers that provide such opportunities shall not unreasonably impose work or service as a means of recovering the costs associated with them.
- **Employment Agencies:** Suppliers that engage private employment agencies must take measures to
 - Ensure that such agencies do not engage in fraudulent practices that place workers at risk of forced labour and trafficking for labour exploitation;
 - Prevent the abuse of workers contracted by such agencies, for example by ensuring that such workers receive adequate protection in relation to wage-related matters, working hours, overtime and other working conditions;
 - Ensure that no fee or cost for recruitment shall be charged to a worker employed by New Look's direct product suppliers, or by a factory manufacturing product for direct suppliers. Recruitment fees for workers in other parts of the supply chains must either not be charged to the worker or must be reasonable and must not result in debt bondage;
 - Use only those recruitment agencies that are licensed or certified by the competent authority.

New Look requires all suppliers to comply with the obligations of this policy. The supplier must also ensure that each of its subcontractors, suppliers, factories and any other entities also comply with the policy.

Situational Action Plan

Situation	Action Plan	Time Frame	Preventative Actions	Stakeholders Involved
An employee is being forced to work, including involuntary overtime.	1. Action needs to be taken to ensure that the employee is out of immediate danger. 2. The supplier and New Look need to work with the factory to understand the reasons why the employee is being forced to work. 3. Steps need to be taken to ensure that the employee is working in line with their signed contract.	Immediate action to improve the situation and provide employees with the necessary support.	• The factory must have appropriate means for an employee to raise a concern, whether it be through a committee, a representative, a union, or another means. • The factory should provide information on organisations for employees to contact externally, if they wish to seek advice or raise a concern.	- Supplier/agent - Factory - New Look - Retailers - External partners, including consultants and NGO's

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Situation	Action Plan	Time Frame	Preventative Actions	Stakeholders Involved
	4. The situation needs to be monitored regularly over a period of time, to ensure that the employee is safe and working in fair conditions.		• The factory must implement robust systems to manage working hours to ensure that no employees are forced to work. • Training must be provided to management and employees on how to raise and handle concerns. • Better capacity planning in the factory to ensure that forced labour is not used.	
A worker's ID documents are withheld, restricting their movement.	1. Action needs to be taken to ensure that the employee is out of immediate danger. 2. An investigation needs to happen between the factory, supplier and New Look to understand why the ID documents have been withheld. 3. The employee shall have their documents returned to them. 4. Training shall be given to management so they understand that employees can't have restricted movement due to withheld documents. 5. Training shall be given to employees to support them in understanding their rights.	Immediate action to ensure that the employee has control over their documents and is free to move.	• The factory must have appropriate means for an employee to raise a concern, whether it be through a committee, a representative, a union, or another means. • The factory should provide information on organisations for employees to contact externally, if they wish to seek advice or raise a concern. • The factory must implement a robust social system to manage personnel files.	- Supplier/agent - Factory - New Look - Retailers - External partners, including consultants and NGO's