

NEW LOOK

Human Rights Statement

New Look's approach to human rights is based on the UN Guiding Principles (UNGP) on Business and Human Rights and the recognition that while states have a duty to protect human rights, companies have a responsibility to respect the same. Both governments and businesses must provide access to remedy for human rights violations, which could include compensation, rehabilitation, and the prevention of further risks.

As a member of the Ethical Trading Initiative (ETI), and through our engagement with various project partners, we are aware of the potential labour and human rights abuses that may occur in our supply chains. Hundreds of thousands of people are part of this network, and we take proactive steps in the way we do business to protect and empower them.

Supply Chain

New Look is committed to respecting human rights in supply chains in line with Ethical Trading Initiative's (ETI) Base Code. We do so by ensuring workers in our supply chain are protected by the right policies and systems and provided access to remedy. Building strong partnerships with our suppliers ensures that we deliver products that are responsibly produced. New Look works with its suppliers to ensure that human rights are respected throughout the supply chain.

All suppliers, factories, agents and any authorised subcontracting units must commit to and demonstrate continued adherence to our standards and policies including our Ethical Aims (set out below) before commencing business with New Look. As a responsible retailer, we have zero tolerance approach towards:

- Forced work – i.e. work that is not undertaken voluntarily;
- Any kind of harassment; physical or sexual;
- Use of child labour;
- Discrimination at any level;
- Unsafe work environment, including but not limited to:
 - No fire exit, no fire alarm, locked exit;
 - Premises that are not structurally safe;
- Repressing worker voice.

We know that many of the serious abuses that exist in our sourcing countries are in the lower tiers of supply chains, hidden from easy sight and hard to identify – particularly forced labour. These can be addressed through collaborative efforts with other businesses and civil society.

To live up to our commitments and address the complex issues facing the fashion industry, it is 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. Each group has something unique to offer and a distinctive way of identifying and acting on challenges. Many of our partners bring essential expert knowledge on specific issues affecting our industry which, combined with our own experience and leverage, can lead to a greater positive impact.

In order to integrate human rights considerations into our business, we take a human rights due diligence (HRDD) approach to our risk assessment. We identify human rights related risks through collaboration and communication with different stakeholders, our own country team presence, factory visits, supply chain traceability and visibility.

If human rights issues are identified, we will seek to both address and understand the root causes of these abuses. We will work with relevant stakeholder groups to drive sustainable improvement and remediate appropriately in line with our remediation policy.

Code of Ethics

New Look’s Ethical Aims are set out below as a Base Code for suppliers, along with factory registration and auditing requirements. The policies, requirements and processes to achieve these aims are also outlined.

Suppliers who enter into business with New Look should show a clear commitment to achieving the Ethical Aims. New Look suppliers must comply with national law and, where the provisions of law and this Base Code address the same subject, to apply the provision which affords greater protection.

Acceptance of these principles is required prior to engaging with suppliers and it is the responsibility of the supplier to communicate these aims to all employees within their company and all entities engaged in the manufacturing and processing of New Look products, up to Tier 2 level at least. Please see below for ‘Tier system’ clarification.

Failure to make efforts to meet the Ethical Aims may result in the ending of the business relationship and the cancellation of all outstanding and future New Look orders, at our discretion.

If you have any queries regarding this document or an employee feels they are unable to resolve an issue through existing procedure, please contact New Look on ethical.support@newlook.com.

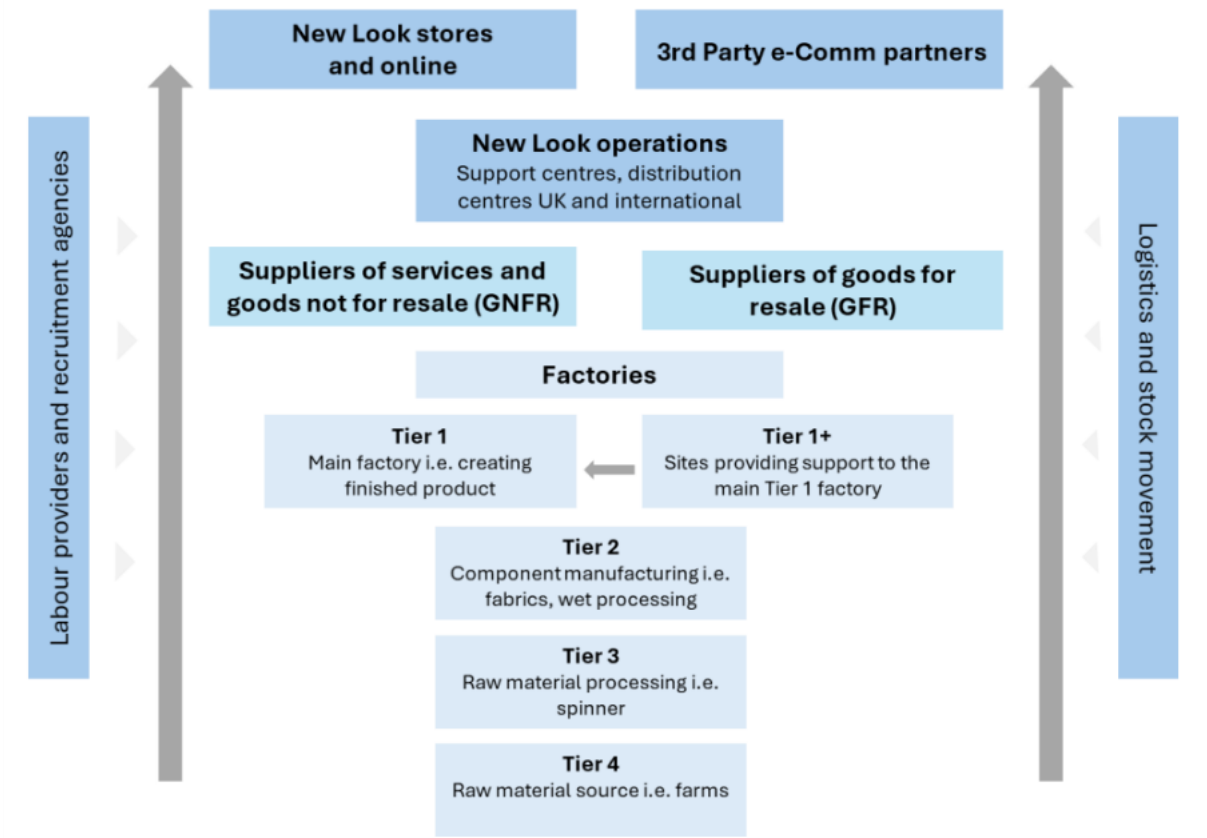


Table 1 – New Look tiering structure of the value chain

New Look Ethical Aims – Base Code

1. Employment is freely chosen

- 1.1. There is no forced, bonded or involuntary prison labour.
- 1.2. Workers are not 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 are not 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.
- 2.5. Wages negotiated through collective bargaining must be implemented.

3. Working conditions are safe and hygienic

- 3.1. All sites manufacturing goods for New Look need to have fire and structural permits as per the country's legal requirement.
- 3.2. 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.
- 3.3. Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- 3.4. Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 3.5. Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- 3.6. 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 children¹.
- 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 persons² 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 must meet, at a minimum, national legal standards or wage set through collective bargaining agreement, 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 without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

6. Working hours are not excessive

¹ Any person less than 15 years of age unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age shall apply.

² Any worker over the age of a child as defined above and under the age of 18.

- 6.1. Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.
- 6.2. Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week. *
- 6.3. All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all of the following:
 - 6.3.1. the extent, frequency and hours worked by individual workers and the workforce as a whole;
 - 6.3.2. overtime shall not be used to replace regular employment.
 - 6.3.3. overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay, however if overtime premium is required by local law at higher rate, the higher rate shall be followed for the purpose of overtime calculation.
- 6.4. The total hours worked in any seven-day period shall not exceed 60 hours, except where covered by clause 6.5 below.
- 6.5. Working hours may exceed 60 hours in any seven-day period only in exceptional circumstances where all of the following conditions are met:
 - 6.5.1. this is allowed by national law;
 - 6.5.2. this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
 - 6.5.3. appropriate safeguards are taken to protect the workers' health and safety; and
 - 6.5.4. the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.
- 6.6 Workers shall be provided with at least one day off in every seven-day period or, where allowed by national law, two days off in every 14-day period.

** International standards recommend the progressive reduction of normal hours of work, when appropriate, to 40 hours per week, without any reduction in workers' wages as hours are reduced.*

7. No discrimination is practised

- 7.1. There is 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.

8. Regular employment is provided

- 8.1. To every extent possible work performed must be based on the 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 homeworking arrangements, or through apprenticeship schemes where there is 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, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

10. Transparency

- 10.1. The Supplier is required to inform New Look of the name and address of each factory / unit prior to New Look production being placed and send all the relevant documentation to register the factory for production. The Supplier must not commence production in a factory / unit until formal authorisation has been given by New Look, as this will be considered as 'unauthorised subcontracting'.
- 10.2. In line with our pledge to develop increasingly strong and transparent relationships with our suppliers, we expect all our suppliers to map and have complete visibility of their supply chain that produce and supply goods to us.
- 10.3. For each fabric mill currently working for the supplier, a Self-Assessment Questionnaire (SAQ) must be completed and sent to New Look Sustainability team.

11. Subcontracting

- 11.1. New Look understands that sometimes suppliers/ factories may sub-contract certain processes in the production of our goods. Any intended sub-contracting/ new factories must be declared in advance and have our written agreement.
- 11.2. For any use of an unauthorised factory/ subcontracting unit the supplier will incur a fine at New Look's sole discretion for breaching CSR standards and policies. The supplier may also face immediate termination of our trading arrangements³.

³ Responsible exit from all facilities would be ensured, in line with New Look's Responsible Entry and Exit Policy.