

NEW LOOK

Anti-Gender-Based Violence and Harassment (GBVH) Policy

New Look is committed to eliminating all forms of gender-based violence and harassment (GBVH) in the workplace and associated supply chains. We recognise GBVH as a serious violation of human rights and a threat to the health, safety, and dignity of individuals. We acknowledge that unequal power relations, gender stereotypes, and social norms contribute to GBVH and we undertake to address these root causes insofar as our influence allows.

We are committed to:

- Fostering an inclusive, safe, and respectful working environment for all.
- Upholding a zero-tolerance approach to all forms of GBVH and inaction on complaints, while actively encouraging reporting by ensuring there will be no retaliation or other negative personal or commercial consequences for any worker, witness, bystander or anyone else who reports or discloses GBVH.
- Ensuring compliance with national legislation and alignment with international standards, particularly [ILO Convention 190](#) and [Recommendation 206](#).
- Working closely with our suppliers to support them with creating their own anti-GBVH policy and ensuring they have effective mechanisms for raising grievances and remediation processes upheld throughout their entire supply chains.

Definition of GBVH

As defined by ILO C190, GBVH refers to **"a range of unacceptable behaviours and practices, or threats thereof, whether a single occurrence or repeated, that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm."** Examples include (but are not limited to):

- Physical assault, sexual violence, and threats of harm.
- Verbal abuse, slurs, or degrading comments.
- Non-verbal abuse such as staring, gestures, or displaying offensive materials.
- Stalking, cyber harassment, and abuse via text or social media.

Scope of the Policy

This policy applies to any supplier and/or factory engaged in a business relationship with New Look, and covers the following:

- All workers, including full-time, part-time, temporary, agency workers, migrant workers, trainees, apprentices, and interns.
- All tiers of the supply chain, including mills, logistics, warehousing and raw material sources.
- All workplace contexts, such as factories, offices, field sites, dormitories, canteens, and sanitary facilities.

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- All work-related activities, such as travel, commuting to/from work, events, meetings, training, and social gatherings.
- Online and digital communications (e.g. emails, messaging apps, calls).
- GBVH experienced due to domestic violence, including abuse by current or former intimate partners, where it impacts work.
- Women workers, LGBTIQ+ individuals, and all those vulnerable to GBVH due to gender identity, sexual orientation, or social status.
- Any third-party brand or concession selling within New Look stores.

Risks of GBVH for New Look's own employees and own operations are covered by our '[Preventing Sexual Harassment](#)' policy and 'Speak Up Whistleblowing' policy.

Roles and Accountability

New Look holds overall responsibility for setting expectations, monitoring compliance, and ensuring appropriate remediation where GBVH risks or incidents are identified. Suppliers are responsible for cascading this policy throughout their supply chains and ensuring that all factories adopt and implement effective anti-GBVH measures consistent with its requirements. Factory management is accountable for the day-to-day prevention of GBVH, the appropriate handling of complaints, meaningful engagement with workers and their representatives, ensuring lack of retaliation and ensuring grievance mechanisms are effective.¹ Senior leadership at both supplier and factory level must actively support, resource, and uphold these commitments.

Assessing GBVH Risks and Prevention Activities

We are committed to conducting gender-inclusive risk assessments during the onboarding of new factories as well as during our standard site visits. Confidential worker interviews, focus group discussions and safety walks, among other procedures, are used to identify GBVH indicators, including long working hours, job insecurity, production pressures, power imbalances, and discriminatory workplace cultures.

We develop a comprehensive tailored Prevention Plan with our suppliers in consultation with the workers. Prevention Plans include targeted training and awareness initiatives, revisions to workplace policies and the regular review and improvement of procedures to ensure sustainable prevention of GBVH.

Access to Remedy & Grievance Mechanisms

We expect all suppliers to work closely with every factory in their supply chain to ensure that all workers have access to confidential and effective grievance mechanisms. These may include trade union representation, elected worker committees, digital or in-person reporting channels, or any other appropriate mechanism that enables workers to raise concerns without fear of retaliation.

¹ UN Guiding Principle on Business and Human Rights 31 defines an effective non-judicial grievance mechanism as one that is: legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, and based on engagement and dialogue.

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Where GBVH is identified, a survivor-centred approach should be prioritised to ensure safety, privacy, and emotional wellbeing throughout the grievance handling process.

Further details on expectations around access to remedy and grievance mechanisms for suppliers and/or factories can be found in the 'Access to Remedy & Grievance Mechanism' Policy.

Training & Awareness

Suppliers and factories are expected to provide regular training and awareness-raising on GBVH for all workers, with enhanced training for supervisors and management. Training should be delivered to all workers in languages they can competently understand, be culturally sensitive, and be repeated periodically to ensure ongoing understanding of rights, responsibilities, and reporting mechanisms.

Review & Monitoring

This policy will be reviewed annually in line with our risk assessment process, incorporating feedback from suppliers, workers and worker representatives, to ensure it remains relevant and effective. Gender-disaggregated data on complaints and outcomes will be maintained confidentially to support informed decision-making. Policy updates will be guided by emerging best practices, insights gained through implementation of this document, and evaluation of procedures applied in past cases.