

NEW LOOK

Access to Remedy & Grievance Mechanisms Policy

New Look is committed to ensuring that all workers in our supply chain have access to safe, trusted, and effective avenues to seek remedy when harm occurs. This policy outlines the principles, processes, and responsibilities for receiving, assessing, and resolving grievances in a fair, timely, and confidential manner, including but not limited to, those related to discrimination, exploitation, abuse, and gender-based violence and harassment (GBVH). It also reflects New Look's survivor-and-rights-centred approach to addressing complaints and the emphasis we place on protection from retaliation.

We expect every New Look supplier to work closely with all the stakeholders in their supply chain to ensure that each worker has access to confidential and effective grievance mechanisms¹. 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.

Suppliers must ensure these mechanisms adhere to the following requirements which should be applicable across all tiers of their supply chain, including their logistics and warehousing partners:

- All workers, including but not limited to, permanent, temporary, migrant, seasonal, homeworkers, young and agency workers must have access to multiple reporting channels, such as union/worker representatives, anonymous hotlines, suggestion boxes, HR or management points of contact, and third-party channels.
- Mechanisms must be available to all workers, including those with disabilities, low literacy levels or limited digital access.
- Workers must be informed, in a language and format they understand, about what issues can be reported and how to use each mechanism available to them with visual materials made available on noticeboards and in worker common areas.
- Training must be conducted at onboarding and be refreshed regularly.

Grievance Procedure

Suppliers must implement a grievance procedure that is documented and effectively communicated to all within their own operations, and work with their factory base to implement the same. Facilities must keep accurate records of grievances, investigation findings, outcomes, and remediation actions.

This should include:

- How grievances are received and logged.
- Investigation steps and expected timelines.
- Roles and responsibilities.

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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- Means and frequency of updating workers.
- Expected closure times or escalation pathways.
- A clear process for appeals if a worker is not satisfied with the outcome.

Suppliers must ensure:

- All applicable local laws relating to freedom of association shall be complied with. Where this policy affords greater protections to workers, it shall apply alongside local legal requirements.
- Workers face no retaliation, intimidation, or disadvantage for raising a grievance. Any individual engaging in retaliation is subject to appropriate disciplinary action.
- Survivors will be offered a range of support services, including but not limited to legal, psychological, medical, or financial assistance, as well as reasonable adjustments to work schedules, duties, or access to paid leave to support their recovery.
- Investigators are trained on case-handling to ensure grievances are handled sensitively.
- The process should be based on informed consent, with complainants updated at every stage and their cases handled anonymously unless otherwise agreed.
- Remedies are proportionate, appropriate, and agreed with the complainant.
- Follow-up monitoring is conducted after closure to ensure no hidden retaliation occurs.
- Gender-related grievances are addressed through a gender-responsive approach, ensuring safe, confidential, and accessible reporting options, including access to female case handlers and off-site channels.

Escalation

Where a grievance cannot be resolved at facility level, suppliers must ensure there are clear and documented escalation pathways that are communicated to workers in an accessible manner. Workers must be informed of their right to raise concerns through external routes, including trade unions, labour inspectorates, judicial or non-judicial grievance mechanisms, or other legitimate third-party channels. Access to and use of these external pathways must not result in retaliation, intimidation, or disadvantage of any kind. Suppliers are expected to respect workers' freedom to seek remedy through such channels and to cooperate in good faith with any resulting processes.

Continuous Improvement

Suppliers must regularly assess the effectiveness of their grievance mechanisms to ensure they remain trusted, accessible, and responsive. This should include periodic reviews of grievance data, such as uptake and usage trends, resolution timelines, and outcomes, as well as qualitative feedback from workers. Workers and their representatives must be consulted as part of the review and improvement process. Findings from these reviews should be used to strengthen grievance systems on an ongoing basis, address barriers to access, and ensure continuous improvement in line with evolving risks and worker needs.

Suppliers are responsible for maintaining appropriate oversight of grievance mechanisms and for reporting grievance data to New Look upon request in an aggregated and anonymised format. Suppliers must cooperate fully during New Look-led investigations, audits, or assessments relating to access to remedy and grievance handling.

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Failure to implement, maintain, or effectively operate grievance mechanisms in line with this policy may result in compulsory corrective actions and where corrective actions are not complied with, or where failures are persistent or severe, the supplier's business relationship with New Look may be impacted (including but not limited to reduced order volumes or termination of the relationship).