

NEW LOOK

Rt Hon Tom Tugendhat MP
Chair, Foreign Affairs Committee
House of Commons
London SW1A 0AA

Rt Hon Nusrat Ghani MP
Business, Energy
and Industrial Strategy Committee
House of Commons
London SW1A 0AA

Rt Hon Darren Jones MP
Chair, Business, Energy and
Industrial Strategy Committee
House of Commons
London SW1A 0AA

5th January 2020

Dear Mr Tugendhat, Ms Ghani and Mr Jones,

Re: Foreign Affairs and Business, Energy and Industrial Strategy Committees' inquiries into Xinjiang detention camps

Thank you for your letter dated 16 December 2020 regarding information from New Look about its supply chain with regards to the Xinjiang region.

As a company that is committed to the highest standards of responsible sourcing across our supply chain, and as a long-term member of the Ethical Trading Initiative (ETI), we share the growing concerns and evidence regarding the use of forced labour in the Xinjiang region, and we welcome the opportunity to respond to your questions on the matter, which are outlined below.

1. What is the nature and extent of your company's operations in Xinjiang?

New Look does not manufacture any of the product it sells within its business. Nor does it have any direct relationship with any operation in Xinjiang. All manufacturing is carried out on New Look's behalf by a long established and loyal supply base that spans the world. When we were made aware of the issues in Xinjiang we proactively communicated with suppliers in China and across our global supply chain to raise everybody's awareness. We outlined actions such as the acceleration of their raw materials mapping activities and increased transparency to ensure we are in no way linked to operations in Xinjiang. In December 2020 we added these actions to our sourcing policy, specifically citing the Xinjiang region which has been communicated to suppliers globally and has now been published in our supplier manual (please see the response to Question 5 below). The manual makes it clear that New Look will not accept any production, raw materials or services linked to the region, and underlines the requirement for evidencing the origin of goods.

2. What specific raw materials arriving in UK markets are sourced from Xinjiang?

New Look does not directly source any raw material from Xinjiang. As members of the Better Cotton Initiative (BCI), we have supported its suspension of its licensing and assurance activities in the Xinjiang region.

New Look Retailers Ltd

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3. Are any of your products assembled in factories deemed to be at risk of using forced labour?

We believe in respecting and improving workers' rights across our value chain, and we have a zero-tolerance policy towards modern slavery in our value chain, including forced labour. Suppliers agree to comply with our policies in agreed terms of trading ahead of order placement.

Our Modern Slavery Statement can be viewed at the following link:

<https://www.newlookgroup.com/sustainability/modern-slavery-statement-0>

We audit our factories annually and work with suppliers and factories on the remediation of root causes of non-compliance (further information is provided below in question 7). Where appropriate, we partner with expert stakeholders to develop and deliver projects to remediate and deliver acceptable working conditions. We remain vigilant to constant changes in labour practices globally through multiple stakeholder groups and local intelligence gathering.

4. Which Chinese companies are involved in your supply chains?

New Look is a signatory to the Transparency Pledge (<https://transparencypledge.org/>) whose objective is to help the garment industry reach minimum standards for supply chain disclosure, and we have been publishing our Tier 1 factory list on our public website since 2016.

As part of our continued commitment to transparency, from March 2020 we additionally started to publish our Wet Processing, Fabric Mills and Tanneries list, which is an ongoing process and is updated regularly: <https://www.newlookgroup.com/sustainability/value-chain/transparency/factory-list>

Since 2019 we have worked with Open Apparel Registry (OAR), an open-source, neutral and publicly accessible digital factory database, which outlines the Chinese facilities we work with, alongside other retailers: <https://info.openapparel.org/>

5. How do you ensure that companies at every stage of your supply chain meet their contractual obligations regarding anti-slavery and anti-human trafficking laws?

The standards we have adopted are those of the ETI, which New Look is a member of since 2003. These are based on the internationally recognised standards of the International Labour Organisation (ILO). As part of our supplier manual and trading agreements, suppliers must also commit to the following policies:

- Anti-Slavery and Human Trafficking policy
- Child Labour policy
- Homeworking policy
- Human Rights Statement
- Migrant and Contract Worker policy
- Refugee policy
- Subcontracting policy
- Uzbek and Turkmenistan Cotton policy. .
- Xinjiang Uyghur Autonomous Region (Uyghur Region) Sourcing policy

Further information on these policies is available from the following link:

<https://www.newlookgroup.com/sustainability/policies>

Due diligence forms a critical part of our efforts to ensure the highest standards are achieved within our value chain globally and to promote positive and long-lasting change. This includes conducting

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audits right across our value chain, with a specific focus on higher-risk regions and we also audit beyond principle manufacturing sites. We work with an on-the-ground specialist team, The Reassurance Network, who help us monitor our value chain on an ongoing basis with regular announced and semi announced visits to factories.

We aim to be vigilant in identifying any potentially vulnerable workers in the value chain and to any emerging social issues. Going beyond audit activity is central to our social sustainability aims, including for example, conducting worker interviews, cross-checking payment records and mapping migrant workers.

Collaboration with other brands and stakeholder groups, including the ETI and British Retail Consortium, for example, helps supports our own intelligence and activities.

6. *What is New Look's approach to assessing and scrutinising its supply chains to ensure that materials are ethically sourced?*

In line with industry peers, our sustainable sourcing strategy focuses on the principal fibres we use; cotton, viscose and polyester. For each fibre, we are moving towards more traceable and more sustainable sources.

For instance, our preferred alternatives to conventional cotton are Better Cotton (The Better Cotton Initiative), organic cotton (certified under the Organic Content Standard and/or the Global Organic Textile Standard) and recycled cotton (certified under the Recycled Content Standard and/or Global Recycled Standard). We have signed the Sustainable Cotton challenge of Textile Exchange as proof of this commitment. And as outlined above, we have also banned cotton from Uzbekistan and Turkmenistan due to risk of forced labour in those countries.

Using certifications and traceable branded fibres is a key objective in establishing the chain of custody of raw materials and their origins.

7. *Where materials from unethical sources are identified, how does your company respond and what steps are taken to mitigate the risk of future occurrences?*

In the extremely rare occasion that material from an unethical source makes its way through our rigorous checks and into the New Look supply chain, we will always take decisive action if materials are identified to be from unethical sources.

When appropriate we work with suppliers and factories on the remediation of issues identified. When remediation fails to deliver the desired outcomes or is not viable for example due to state backed initiatives, we will act to disengage and find alternative sources.

8. *What is your information-gathering process for your Modern Slavery statements, and how do you verify this information? What is your process for acting on the findings of your Modern Slavery statements?*

Our Modern Slavery Statement can be viewed at the following link:

<https://www.newlookgroup.com/sustainability/sustainability-new-look>

New Look's Modern Slavery working group, chaired by the Company's Modern Slavery Officer and comprising of representatives from each business area, operations, Goods for Resale buying and Goods Not for Resale procurement and business partners, meets monthly.

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We gather intelligence from many sources including whistle blowers, worker interviews, multi-stakeholder forums, and well-informed NGO advisers to identify vulnerable workers and priorities, and work together with external stakeholders to tackle risks, raise awareness and deliver impactful improvement programmes across our business.

The group reports on a biannual basis via our internal audit committee to the Board.

We trust that that our answers are of assistance and thank you again for the opportunity to provide a response to your questions on this matter. As we have outlined above, as a responsible retailer we remain fully committed to the highest standards of responsible sourcing across our supply chain. We have a zero-tolerance policy towards forced labour and we will not source products or raw materials from any regions that are linked to the exploitation or forced labour of Uyghur workers. We will also continue to actively work with relevant stakeholders like the Ethical Trading Initiative and British Retail Consortium to help bring positive, long-term change.

Yours faithfully,



Nigel Oddy, Chief Executive Officer
New Look



Sue Fairley, Head of Sustainability
New Look



Foreign Affairs Committee

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From the Chair
Tom Tugendhat MP

Nigel Oddy
CEO
New Look
Letter by email: sue.fairley@newlook.com

16 December 2020

Dear Mr Oddy,

We are writing to you following recent reports that parts of UK companies' supply chains include materials and/or labour sourced from the Xinjiang Uyghur Autonomous Region of China. As part of the Foreign Affairs and Business, Energy and Industrial Strategy Committees' inquiries into the Xinjiang detention camps, we are reaching out to a number of businesses to establish a clearer understanding of commercial activity in the region, and what private companies perceive their ethical responsibilities to be in this area.

We would be grateful if you could address the following questions:

1. What is the nature and extent of your company's operations in Xinjiang?
2. What specific raw materials arriving in UK markets are sourced from Xinjiang?
3. Are any of your products assembled in factories deemed to be at risk of using forced labour?
4. Which Chinese companies are involved in your supply chains?
5. How do you ensure that companies at every stage of your supply chain meet their contractual obligations regarding anti-slavery and anti-human trafficking laws?
6. What is New Look's approach to assessing and scrutinising its supply chains to ensure that materials are ethically sourced?
7. Where materials from unethical sources are identified, how does your company respond and what steps are taken to mitigate the risk of future occurrences?
8. What is your information-gathering process for your Modern Slavery statements, and how do you verify this information? What is your process for acting on the findings of your Modern Slavery statements?

It would be helpful to have a response to this letter by 5 January 2021. We intend to place your response in the public domain.

Best wishes,

TOM TUGENDHAT MP
CHAIR, FOREIGN AFFAIRS COMMITTEE

Handwritten signature of Nusrat Ghani in blue ink, with a horizontal line underneath.

NUSRAT GHANI MP
BUSINESS, ENERGY AND INDUSTRIAL STRATEGY COMMITTEE

Handwritten signature of Darren Jones in black ink.

DARREN JONES MP
CHAIR, BUSINESS, ENERGY AND INDUSTRIAL STRATEGY COMMITTEE