

## An Overview on approach, status and goals

The welfare of the people who make products for Primark matters to us. We require suppliers and factories who commit to making our products to do so in factories with good working conditions, so that people are treated decently and paid a fair wage. And we strive to minimise the impact on our planet wherever we can. We share these goals with the Partnership for Sustainable Textiles and our membership underlines our commitment to enhance sustainability across the entire supply chain.

### Primark's goals for the Partnership for Sustainable Textiles 2017

For the German Partnership for Sustainable Textiles 2017 roadmap, Primark has set 14 goals. We have an extensive range of social and environmental activities across the Primark supply chain and for the roadmap we have chosen the goals which best align with the Partnership's reporting scheme. In many cases the goals refer to the next stage of programmes which have been in place for a number of years, such as our work with ACT, training of cotton farmers in India in sustainable farming practices and all the goals under the Chemical Management section. A new goal is the development of formalised and robust grievance procedures for workers to use, which we will be doing in consultation with other brands and NGOs. The next two pages summarise Primark's 2017 goals for the Partnership.

### German Partnership for Sustainable Textiles: one building block of Primark's international engagement

We believe no one retailer alone can have a positive impact on an entire industry. However we believe we can play a role alongside other retailers, NGOs and other organisations, to improve ethical and environmental standards in the industry. Primark is a member and active contributor in several multi-stakeholder initiatives, like the Ethical Trading Initiative, the Sustainable Apparel Coalition and the ACT initiative on wages. Primark is also on the board of organisations including Zero Discharge of Hazardous Chemicals (ZDHC) Programme and the UK's Ethical Trading Initiative. All these bodies include some type of reporting, either internally to them or publically.

### Primark's programmes and activities

It is a step-by-step process: for more than a decade Primark has worked to promote workers' rights within our supply chain, to improve the lives of the workers and to reduce our environmental impact. Today we have an extensive social and environmental programme across our supply chain, much of which falls outside the activities covered by our Partnership roadmap goals. For example, we have a programme of structural integrity surveys for our suppliers' factories in Bangladesh and Pakistan, which we are looking to extend to our sourcing countries in South East Asia, over the coming months. We also run training programmes and other projects for our suppliers and their workforces, such as the SAVE health and education community project in Southern India, which we have been running since 2009.

<https://www.primark.com/en/our-ethics/people-production/running-education-programmes>

### Code of Conduct

Primark is able to offer low prices because we do some simple things differently to other retailers, for example, we have very efficient processes and do almost no advertising, but we do have high standards. These are set out in the Primark Code of Conduct, which is the backbone of the Ethical Trade and Environmental Sustainability programme and covers a robust set of requirements. The Code of Conduct is underpinned by the UN Guiding Principles and OECD guidelines, and has a robust due diligence framework. It forms part of every supplier's contract and is a condition of doing business with Primark. 100% of all Primark's suppliers' factories are audited against the Code. Today Primark has more than 90 ethical and environmental experts based in key sourcing countries, who undertake the following activities: they monitor compliance, carrying out almost 3.000 audits per year; deliver training for factory management and their workers; and engage with stakeholders locally. In 2016 more than 7000 hours of training was conducted. Primark's extensive range of social and environmental activities has gained Primark Leadership status from the UK's Ethical Trading Initiative since 2011.

<https://www.primark.com/en/our-ethics/people-production/standards-in-factories>

## Primark 2017 Partnership for sustainable textiles roadmap goals

### Chemical Management:

As an international retailer with a complex supply chain Primark makes a real effort to reduce its impact on the planet wherever it can. As textile manufacturing has evolved, so too has the range of fabrics and functionality on offer to customers. The development of water-resistant fabrics, or having the season's latest colours available across a range of products, has meant that new and different chemicals have been introduced into supply chains. Like a number of other high street retailers, we have signed up to the ZDHC Foundation's programme, in which we are phasing out certain chemicals deemed hazardous and replacing them with alternatives and also committed to Greenpeace's Detox campaign in 2014.

- Primark's support of suppliers in their chemical management is the centre point of the 2017 goals, through
  - Running a targeted training programme to promote the use of the ZDHC Chemical gateway– The Chemical Gateway is an online search tool, which helps to choose chemicals that are less harmful to the environment. The aim is to improve chemical product procurement practices.
  - Requiring strategic suppliers to follow the ZDHC Chemical Management System manual and audit protocol– With our most important suppliers we intend go a step further. The objective is for our suppliers to understand how to implement good environmental management practices in their factories.
- In 2016 Primark partnered with leading industry chemical experts to review our environmental sustainability programme. As an outcome of this in 2017:
  - The Primark Environmental Management System will be finalised using the ISO 14001:2015 standard – This system will support the management and monitoring of the environmental impacts of Primark's supply chain operations world-wide as well as identifying how we can continually improve our performance year on year.
  - The Primark chemical inventory will be developed and published
  - An enhanced, more detailed Detox Report will be published
- Water conservation is one of our focus areas: Primark will engage with strategic suppliers on submission of wastewater data to the platform of the Institute of Public Environmental Affairs. In parallel the Primark environmental sustainability team carry out assessments within factories to identify the root cause of any environmental issues.

More information on the programmes involving raw materials can be found here:

<https://www.primark.com/en/our-ethics/planet-and-environment/responsible-manufacturing>

## Social Standards and Living Wages segment

Whether making t-shirts in Bangladesh, socks in Turkey or footwear in India, we expect wages of people making products for Primark to be fair and working conditions safe. Primark does not own factories and requires every supplier and factory to comply with the Primark Code of Conduct. It is based on the International Labour Organisation (ILO), a United Nations body, as well as the Ethical Trading Initiative Base Code and it also encompasses the Textilbündnis goals.

- For 2017 Primark puts the emphasis on
  - Strengthening the grievance mechanism – The aim is that grievances can be addressed early and remediated directly. The mechanisms within factories should be designed to complement, and not undermine, the role of trade unions and collective bargaining processes.
  - In 2017, we will finalize the ACT purchasing practice industry benchmark tool, which will identify the purchasing practices that have the greatest impact on a living wage – While seamstresses and other worker’s wages are fixed by the producing suppliers, Primark acknowledges the impact retailers as customers can have here. Jointly with others, Primark will finalise the ACT (Action, Collaboration, Transformation) purchasing practice industry benchmark tool. The self-assessment questionnaire looks at all the key elements, activities, procedures and processes involved in purchasing practices, all of which can impact a living wage.
  - Underage working in the garment industry – Primark is supporting the ILO (international Labour Organisation) to develop a framework for the clothing and textile industry on how to prevent and address child labour. This will include training for suppliers, auditors, and companies, how to establish effective partnerships on the ground and how to track and monitor impacts. They will be publicly available through the ILO.
- As part of the on-going evolution of the Primark programme the audit verification process will be refined – To ensure the nearly 3.000 audits carried out each year are as robust as they can be, Primark works with external partners to conduct additional due diligence checks on the audits, and on those conducting them. A framework and internal procedures will be piloted in China and India.
- As part of the environmental sustainability programme the Primark Recycling initiative will be rolled out in more stores across Europe.

More information about Primark’s activities in our supply chain can be found here:

<https://www.primark.com/en/our-ethics/people-production>

## Natural Fibres segment

A range of natural and manmade fibres are used to make Primark products. Cotton is one of the most important natural fibres used, but others play an important part in production too. Regardless of the raw material used, it matters to us that it is sourced responsibly. Primark does not buy raw materials directly, this is done by Primark suppliers or factories. Through our commitment to an initiative from environmental experts WRAP – the Sustainable Clothing Action Plan (SCAP) - we have been working with our suppliers to improve the traceability of raw materials in our supply chain. We also want to ensure our raw materials are sustainably sourced, and have started with cotton.

- Primark will assess the volume of sustainable natural fibres used by suppliers – Taking stock of the sustainable natural fibres used by suppliers is one step in achieving traceability.
- The 2017 spotlight is on Cotton by scaling up the Primark Sustainable Cotton Programme to 5.151 female farmers in India – The programme trains female farmers in India in sustainable farming methods. The impact is threefold: increased livelihood through increased income, improved cotton yield and improved sustainability through reduced use of chemical fertilizers, pesticides and water. The impact of the programme is assessed regularly, e.g. 2.087 kg less fertilisers were used and profit increased by 246% over 3 years
- Between 2013 and 2016 1.251 female farmers were trained. In 2016 the programme was extended to 2022 to include a further 10.000 farmers.

More information about Primark's activities regarding natural fibres can be found here:  
<https://www.primark.com/en/our-ethics/planet-and-environment/raw-materials>

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Primark Limited		Member since March 2016
Companies (brand/retail)		
<b>Limited</b> Arthur Ryan House, Mary Street 1 1 Dublin, Republic of Ireland	A subsidiary company of Associated British Foods Plc	<b>Memberships:</b> <ul style="list-style-type: none"> <li>• Accord on Fire and Building Safety in Bangladesh</li> <li>• Ethical Trading Initiative (ETI)</li> <li>• Responsible Sourcing Network, ILO Child Labour Platform, ILO Better Work, ACT, Amsterdam Coalition, SCAP, ECAP, Leather Working Group, VGT NL, India BEWG, and other national and local groups.</li> <li>• Sustainable Apparel Coalition (SAC)</li> <li>• Zero Discharge of Hazardous Chemicals (ZDHC)</li> </ul>
<b>Number of employees (Reporting period):</b> 69000	<b>Top 3 countries of origin of textile procurement:</b> No entry	<b>Top 3 sales markets (countries):</b> No entry
Profile / Self – display:		CSR profile:
<p>Primark offers good quality fashion that is affordable for everyone. We are an international retailer, with over 330 stores in 11 countries. We are able to offer low prices because we do some simple things differently to other retailers, for example we have very efficient processes and do almost no advertising. But we do have high standards: Our Ethical Trade and Environmental Sustainability team of over 90 people based in key sourcing countries around the world, monitor standards in our suppliers' factories and are critical to ensuring that the standards we require are met. We have an extensive range of social and environmental programmes across our supply chain and regularly report on these to the multi-stakeholder initiatives we are members of, including the Textilbündnis, the Sustainable Apparel Coalition and the Ethical Trading Initiative, where we have held 'Leadership' status since 2011.</p>		<p>The welfare of the people who make products for Primark and the planet matters to us. As we do not own any factories, we require suppliers and factories who produce for Primark, to adhere to our Code of Conduct and is based on international standards. It sets out all our standards, including working conditions and the environment. . We audit every factory at least once a year, sometimes more. This work is carried out by our Ethical Trade team, who carry out almost 3,000 audits of our suppliers' factories every year. Building on this work, we carry out large amount of projects in order to train and support factory management and the workers. This deals with topics such as worker's rights and environmental protection.</p> <p><a href="https://www.primark.com/en/our-ethics#start">https://www.primark.com/en/our-ethics#start</a></p> <p><a href="https://www.primark.com/en/our-ethics/setting-high-standards/our-performance">https://www.primark.com/en/our-ethics/setting-high-standards/our-performance</a></p>

# Goals for 2017

Primark Limited has set targets for 2017 in 14 of 28 possible fields (key questions)

Topic	Key question	Goal for 2017
<b>Chemicals and Environmental Management</b>	Does your organisation promote the application of an MRSL (Manufacturing Restricted Substances List) in its procurement processes?	<b>In 2017, we will run a targeted training programme for our suppliers to promote the use of the ZDHC Chemical Gateway. The objective will be for suppliers to commit to using the Gateway for procurement of chemicals that are less harmful to the environment.</b>
	Does your organisation recommend and support taking stock of chemical products used and reporting quantities and types of chemicals (chemical inventory)?	<b>In 2017, we will further develop and publish the Primark chemical inventory on our website.</b>
	Does your organisation recommend its business partners and producers proper and environmentally safe management (good housekeeping) and does it support them in achieving this?	Implementation of measures (individually or in cooperation) to support the implementation of proper and environmentally safe management <b>In 2017, we will require our strategic suppliers to use ZDHC CMS manual and audit protocol.</b>
	Does your organisation recommend and support measures for improving wastewater management and/or reporting wastewater data?	Communication of a specific data platform to producers with wet processes <b>In 2017, we will engage with our strategic suppliers in China on submission of waste water data to the IPE platform.</b>
	Does your organisation support the periodic assessment of the existence and functioning of environmental management systems in its facilities and supply chain?	<b>We will finalise developing Primark's Environmental Management System using internationally recognised standard ISO14001, which sets out the framework we will follow to establish and continuously improve our environmental performance within our supply chain whilst complying with relevant legislation</b>
	Does your organisation publish information or a sustainability report in the field of chemicals/environmental management in the supply chain?	Publication of information or sustainability report on chemical/ environmental management <b>In 2017, we will continue to build upon our progress under our Detox commitment by publishing an enhanced Detox report on our website, which will contain increased detail on our implementation process and results.</b>

<b>Social Standards and Living Wages</b>	<p>Does your organisation have a code of conduct / obligation for producers and business partners that covers the Partnership's social goals and cascades their implementation in the supply chain?</p>	<p>Including an obligation to maintain systematic social dialogue and establish a complaints mechanism into the code of conduct</p> <p><b>In 2017, Primark will review its role in ensuring that effective grievance mechanisms are available. We will benchmark best practice from a range of industries, and we will consult with relevant stakeholders to develop a supply – chain wide approach to enabling workers' access to grievance mechanisms.</b></p>
	<p>Does your organisation assess risks and their impacts on the Partnership's social goals along its textile supply chains and in its business relationships?</p>	<p>Analysis of own procurement processes for ways to promote payment of living wages in the supply chain and/or to prevent excessive overtime hours</p> <p><b>In 2017, we will finalize the ACT purchasing practice industry benchmark tool, which will identify the purchasing practices that have the greatest impact on a living wage. This tool will be used by all ACT members to define best practice and identify where improvements need to happen.</b></p>
	<p>Does your organisation incorporate the results of any social or human rights risk and impact assessments into the procurement process or its own operations?</p>	<p>Incorporation of requirements for preventing, monitoring and handling cases of child or forced labour into own standards and processes</p> <p><b>In 2017, we will begin implementation of a best practice framework to prevent, mitigate and remediate the risk of child labour, through our partnership with ILO – IPEC. This includes a review of our Code of Conduct and tools for remediation, tracking and monitoring, which we will share with members.</b></p>
	<p>Does your organisation possess effective verification and monitoring processes along the supply chains?</p>	<p>Audit the effectiveness of the social management systems by an independent third party</p> <p><b>In 2017, we will refine our audit verification programme, establishing a frame work and internal procedures, and pilot this in China and India.</b></p>
	<p>Does your organisation ensure or support granting affected persons access to effective complaints mechanisms?</p>	<p>Support of producers in risk countries in establishing effective complaints mechanisms</p> <p><b>In 2017, we will review our existing approach on Grievance Mechanisms in line with the UNGPs and with relevant stakeholders to see where the process can be strengthened further to protect those within our supply chain.</b></p>
	<p>Is your organisation (individually or collectively) committed to the sector – wide implementation of the Partnership's social goals?</p>	<p>Promotion of awareness of socially sustainable textile production in Germany</p> <p><b>Following our successful pilot in UK and Germany, we will roll out the Primark Recycling Initiative to cover more European stores in 2017/2018.</b></p>

<b>Natural Fibres</b>	Does your organisation promote the use of sustainable natural fibres in its procurement processes?	Stocktaking for recording the total amount of natural fibres and the proportion of sustainable natural fibres <b>In 2017, we will take stock of the sustainable natural fibres we use.</b>
	Does your organisation promote measures for farmers and/or agricultural workers that support the Partnership's goals in the field of natural fibres?	Expansion of an existing training concept <b>In 2017, we will scale up training from 1.251 to 5.151 farmers in India.</b>

## Our commitment to the Partnership for Sustainable Textiles

<b>Participation in Partnership Committees</b>	Working Group Natural Fibers, Working Group Implementation and Internationalisation, Working Group Review Process
<b>Participation in Partnership initiatives</b>	No entry
<b>Other Commitment</b>	No entry