Primark Limited has set the following targets for the year 2019:

- **Mandatory targets:** 5
- **Recommended targets:** 1
- **Already achieved goals:** 8
- **Not achieved, continued goals:** 0
- **Voluntary targets:** 3

### Corruption prevention policy

**Target demand:** Commitment to a zero tolerance towards all forms of corruption including extortion and bribery in the own organisation

**Target already met**

Our Anti-Bribery and Corruption Policy and procedure form part of our Code of Conduct, and all suppliers are assessed for Anti-Bribery and Corruption as part of our General Terms and Conditions of Business.

### Identification of deeper supply chain actors

**Target demand:** Identification of additional actors in the deeper supply chain

We will expand the Primark Sustainable Cotton Programme (PSCP) in 2019, and by 2022, over 30,000 farmers will be enrolled in the programme. Within the PSCP, we monitor and record data on yarn production, ginning, and cotton growing, at farmer level, enabling us to have full traceability.

### Cross topic

#### Risk-based selection of suppliers & procurement

**Target demand:** Selection of suppliers and award of contracts taking into account the identified social risks and potential negative impacts

**Target already met**

Every factory producing for Primark is audited before the start and at least once a year throughout the entire business relationship. Suppliers’ performances are tracked through an internal system, which is used by buying teams to support order placement decisions.

#### Prohibition of subcontracting

**Target demand:** It is prohibited for producers and business partners to award sub-contracts without authorisation

**Target already met**

Undisclosed sub-contracting is prohibited and constitutes a breach of our Supplier Code of Conduct and General Terms and Conditions of Business.

### Social standards

#### Promotion of living wages

**Target demand:** Initiation or involvement in a measure that aims to pay living wages for employees in production countries

**Target already met**

Primark and other leading retailers developed the ‘ACT on Living Wages’ initiative to provide a global framework on living wages. The initiative aims to improve wages in the global garment sector by establishing industry-wide collective bargaining in sourcing countries.
Chemical and environmental management

**Reduction of hazardous chemicals**
Target demand: Measures to increase ZDHC conformity of the used chemical products in the supply chain
In 2019, our Environmental Sustainability team will continue to support the implementation of ZDHC’s chemical gateway for suppliers in our extended supply chain by providing training through workshops, factory visits and supplier meetings.

**Orderly & environmentally responsible housekeeping**
Target demand: Support of producers in the supply chain to improve proper and environmentally sound business management
In 2019, our Environmental Sustainability team will continue to support the implementation of ZDHC’s chemical gateway for suppliers in our extended supply chain by providing training through workshops, factory visits and supplier meetings.

**Communication of wastewater guidelines**
Target demand: Communication of the wastewater standard to 100% of producers and business partners
Target already met
We have communicated the ZDHC wastewater standard to 100% of producers and business partners in 2018. We will continue to support the implementation of the ZDHC Wastewater Guidelines by scaling up our testing and continuous improvement programme in line with our commitments to ZHDC.

Natural fibers

**Increase sustainable cotton**
Increase share of sustainable cotton to 10 %
Including organic cotton (as a share of the total amount of cotton) 10 %
In 2017 we launched our first sustainable cotton products, and announced our ambition for all our cotton to be sustainable. We are investing further in expanding our Primark Sustainable Cotton Programme to over 30,000 farmers in India and Pakistan.

Corruption prevention

**Zero tolerance regarding corruption within supply**
Target demand: Act on / Stand up against all forms of corruption including bribery and extortion in the own organization and towards producers and business partners.
Target already met
Our Anti-Bribery and Corruption Policy and procedure form part of our Code of Conduct, and we have a defined process to ensure all suppliers are assessed for Anti-Bribery and Corruption as part of our General Terms and Conditions of Business. All relevant personnel receives ABC-training regularly.

Monitoring & auditing of guidelines

Target demand: Introducing an effective system for inspecting and monitoring the implementation of measures to improve social and environmental conditions in the supply chain
Target already met
All factories are audited against our CoC before being approved for Primark production. Our team follow up on any issues identified & produce a CAP for the factory. In addition, factories must submit environmental management data through the HIGG Self Assessment tool and IPE in China.

Access to effective complaint mechanisms

Target demand: Initiation or involvement in a measure that aims to improve employee access to complaints mechanisms
In 2019, we will design and prepare a pilot for using a hotline as point of access to the grievance mechanism to be launched with our suppliers in the UK. Following a successful design, we envision implementation of the pilot in 2020.

Explanation
Primark is aware of the risks associated with chemical substances in the global garment production, both to the environment as well as to the workers handling them. We work collaboratively with other signatory brands, retailers and chemical manufacturers towards the elimination of certain substances, through the Zero Discharge of Hazardous Chemicals Foundation (ZDHC). More information: https://www.roadmaptozero.com/

Explanation
In 2018 we continued the rollout of our Chemical Management Implementation Toolkit which allows us to assess the current standard of chemical management and housekeeping within our global supply chain. Our in-country teams will provide guidance and support to our suppliers through in-person meetings, workshops and site visits. Primark currently also uses the SAC HIGG Facilities Environmental Module 3.0 to communicate our expected level of environmental management to Suppliers. More information: https://www.primark.com/en/our-ethics/planet-and-environment

Explanation
In 2017 we launched our first sustainable cotton products, and announced our ambition for all our cotton to be sustainable. We are investing further in expanding our Primark Sustainable Cotton Programme to over 30,000 farmers in India and Pakistan.

Explanation
Current quantity sustainable cotton
Share of SUSTAINABLE cotton in total amount of cotton 1.9 %
Of which ORGANIC cotton as a percentage of the total amount of cotton No entry

Explanation
Enabling workers and affected parties throughout the supply chain to raise grievances is important. However, access to grievance mechanisms is often not easily obtainable - especially for vulnerable persons. For this reason we aim to strengthen the facilitation of grievances by designing, piloting and learning from easier access to grievance mechanisms. This process also includes thorough expert consultations and advise on best practice in the field.
The initiative "Primark Cares" highlights Primark's commitment to Quality, Ethical Trade and Environmental Sustainability to customers. It has so far included, among others, general information about Primark's activities with regards to Ethical Trade and Environmental Sustainability in the supply chain, as well as introduced products with more sustainable features for our customers, such as products with Sustainable Cotton, and other recycled fibres. This underlines Primark's vision to make sustainability affordable for all.

Voluntary targets

**Disclosure of manufactures & business partners**

Target demand: Systematic identification and publication of all business partners and producers

- Primark has mapped and assessed all its Tier 1 suppliers with which it has a contractual relationship, and in 2018 published its Global Sourcing Map. This map is updated every six months and includes information such as the address, number of workers and gender split.

**Raising awareness regarding sustainable textiles**

Target demand: Implementation of measures to raise awareness about sustainable textile production in the following topics

- In 2019, we will expand our range of products with sustainable features such as sustainable cotton and recycled fabric, and actively communicate this to our customers. This includes launching Primark denim made with 100% sustainable cotton.

**Voluntary targets**

**Own internal Policy**

- Target demand: Adoption of a policy on the topics:
  - Human Rights

  Primark will publish its human rights policy in 2019 following extensive preparatory consultation with internal business and external stakeholders. It will align with the UN Guiding Principles, core UN conventions and OECD Due Diligence Guidance.

**Policy—Expansion**

- Target demand: Expansion of the policy to include the following topics:
  - h) Forced labour
  - Grievance mechanisms

  In 2019 we will publish a revised copy of our Code of Conduct which includes updates on forced labour and inclusion of a new clause on grievance mechanisms.

**Expanding the requirements**

- Target demand: Expanding our requirements to the supply chain to include:
  - j) Use of safe chemicals

  Over 2019, we will align our Chemicals and Pollution Management programme, part of our Environmental Management system, with existing requirements within our direct sites (stores, offices, distribution and inspection centres). An analysis of chemical products used and stored will be completed to ensure compliance with Primark’s RSL / MRSL.

**Sector-wide commitment**

- Target demand: Implementation of measures to raise awareness about sustainable textile production in the following topics

  In 2019, we will expand our range of products with sustainable features such as sustainable cotton and recycled fabric, and actively communicate this to our customers. This includes launching Primark denim made with 100% sustainable cotton.

**Public disclosure of products and supply chain impacts**

- Target demand: Systematic identification and publication of all business partners and producers

  - Primark has mapped and assessed all its Tier 1 suppliers with which it has a contractual relationship, and in 2018 published its Global Sourcing Map. This map is updated every six months and includes information such as the address, number of workers and gender split.

**Reporting and communication**

- Target already met

  Primark has mapped and assessed all its Tier 1 suppliers with which it has a contractual relationship, and in 2018 published its Global Sourcing Map. This map is updated every six months and includes information such as the address, number of workers and gender split.

**Sector-wide commitment**

- Target demand: Implementation of measures to raise awareness about sustainable textile production in the following topics

  In 2019, we will expand our range of products with sustainable features such as sustainable cotton and recycled fabric, and actively communicate this to our customers. This includes launching Primark denim made with 100% sustainable cotton.

**Voluntary targets**

**Disclosure of manufactures & business partners**

- Target demand: Systematic identification and publication of all business partners and producers

  - Primark has mapped and assessed all its Tier 1 suppliers with which it has a contractual relationship, and in 2018 published its Global Sourcing Map. This map is updated every six months and includes information such as the address, number of workers and gender split.

**Raising awareness regarding sustainable textiles**

- Target demand: Implementation of measures to raise awareness about sustainable textile production in the following topics

  - In 2019, we will expand our range of products with sustainable features such as sustainable cotton and recycled fabric, and actively communicate this to our customers. This includes launching Primark denim made with 100% sustainable cotton.

**Voluntary targets**

**Own internal Policy**

- Target demand: Adoption of a policy on the topics:
  - Human Rights

  Primark will publish its human rights policy in 2019 following extensive preparatory consultation with internal business and external stakeholders. It will align with the UN Guiding Principles, core UN conventions and OECD Due Diligence Guidance.

**Policy—Expansion**

- Target demand: Expansion of the policy to include the following topics:
  - h) Forced labour
  - Grievance mechanisms

  In 2019 we will publish a revised copy of our Code of Conduct which includes updates on forced labour and inclusion of a new clause on grievance mechanisms.

**Expanding the requirements**

- Target demand: Expanding our requirements to the supply chain to include:
  - j) Use of safe chemicals

  Over 2019, we will align our Chemicals and Pollution Management programme, part of our Environmental Management system, with existing requirements within our direct sites (stores, offices, distribution and inspection centres). An analysis of chemical products used and stored will be completed to ensure compliance with Primark’s RSL / MRSL.

**Sector-wide commitment**

- Target demand: Implementation of measures to raise awareness about sustainable textile production in the following topics

  In 2019, we will expand our range of products with sustainable features such as sustainable cotton and recycled fabric, and actively communicate this to our customers. This includes launching Primark denim made with 100% sustainable cotton.

**Public disclosure of products and supply chain impacts**

- Target demand: Systematic identification and publication of all business partners and producers

  - Primark has mapped and assessed all its Tier 1 suppliers with which it has a contractual relationship, and in 2018 published its Global Sourcing Map. This map is updated every six months and includes information such as the address, number of workers and gender split.

**Reporting and communication**

- Target already met

  Primark has mapped and assessed all its Tier 1 suppliers with which it has a contractual relationship, and in 2018 published its Global Sourcing Map. This map is updated every six months and includes information such as the address, number of workers and gender split.

**Sector-wide commitment**

- Target demand: Implementation of measures to raise awareness about sustainable textile production in the following topics

  In 2019, we will expand our range of products with sustainable features such as sustainable cotton and recycled fabric, and actively communicate this to our customers. This includes launching Primark denim made with 100% sustainable cotton.