

Primark Germany – Human Rights and Environmental Strategy Statement

Introduction

This document is the human rights and environmental strategy statement of Primark Mode Ltd. & Co. KG (*Primark Germany*), made under section 6(2) of the German Supply Chain Duty of Care Act (*LkSG*). The statement sets out Primark Germany's approach to its obligations under the LkSG and summarises how that approach operates within the frameworks set by the wider Primark group (*Primark*).

Approach to human rights and environmental risks

Primark Germany is responsible for the identification and management of human rights and environmental risks relating to its own colleagues, stakeholders and operations in Germany. We have human resource professionals at a country, regional and store level who work closely with colleagues and our Works Council. They are in place to understand any human rights risks relating to our own colleagues.

Primark's Ethical Trade and Environmental Sustainability (*ETES*) team, which works across Primark globally, conducts due diligence on human rights issues and risks relating to the supply chain of products sold or used by Primark Germany to the extent such products or supplier are covered by the defined audit scope.

Primark's commitment and approach to human rights risks in our global supply chain (including Primark Germany's supply chain) is set out in our Supply Chain Human Rights Policy (available [here](#)). The Primark Supplier Code of Conduct (available [here](#)) sets out the human rights standards Primark requires its suppliers to meet. Primark releases an annual Modern Slavery Statement setting out the steps we are taking to address modern slavery risks in our operations and, where we can, our supply chain (available [here](#)).

Primark's approach to environmental risks in our own operations (including in Germany) and our supply chain is set out in our Environmental Policy (available [here](#)). In addition, the Primark Supplier Code of Conduct requires suppliers to comply with all local laws and regulations regarding the protection and preservation of the environment.

Primark sets out a list of chemicals that suppliers are not permitted to use in the manufacture of Primark products and materials, information available on this can be found [here](#).

Primark's salient human rights and environmental risks

The ETES team includes a global team of more than 130 dedicated Primark employees plus third-party contractors working across each of our key sourcing territories. The team works closely with each of the third-party facilities where Primark's finished products are manufactured. Through Primark's analysis of human rights in our own operations and our global supply chain, understanding of environmental risks, the experience of our ETES team and our extensive consultation with stakeholders and rightsholders, we identify what we believe to be the salient human rights issues and environmental risks. Our Primark Supplier Code of Conduct and our Environmental Policy reflect the current salient risks identified by Primark, these policies are kept under constant review. The identified risks are as follows:

Forced labour

Freedom of association and right to collective bargaining

Safe and hygienic working conditions

Child labour

Payment of minimum wages

Excessive working hours

Discrimination

Regular employment

Harsh or inhumane treatment

Bribery and corruption

Grievance mechanisms

Responsible sourcing of materials

Chemical management

Resources and waste

Energy efficiency and greenhouse gases

Water efficiency and conservation

Animal welfare and biodiversity