



Independent Limited Assurance Report of KPMG LLP to ABF Investments Plc

KPMG LLP (“KPMG” or “we”) were engaged by ABF Investments plc (“ABF Investments”) to provide limited assurance over the Selected Information described below for the year ended 31 December 2022.

Our conclusion

Based on the work we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the Selected Information has not been properly prepared, in all material respects, in accordance with the Reporting Criteria.

This conclusion is to be read in the context of the remainder of this report, in particular the inherent limitations explained below and this report’s intended use.

Selected Information

The scope of our work includes only the information included within ABF Investments’ subsidiary Primark’s ‘Our Performance’ report (“the Report”) for the year ended 31 December 2022 marked with the symbol [φ] (“the Selected Information”) (and also listed in Appendix 1).

We have not performed any work, and do not express any conclusion, over any other information that may be included in the Report or displayed elsewhere on ABF Investments’ or Primark’s website for the current year or for previous periods unless otherwise indicated.

Reporting Criteria

The Reporting Criteria we used to form our judgements are ABF Investments’ Reporting Guidelines 2022 as set out within the Reporting Criteria section of the ‘Our Performance Report’ located at <https://corporate.primark.com/en-gb/primark-cares/resources/reports> (“the Reporting Criteria”). The Selected Information needs to be read together with the Reporting Criteria.

Inherent limitations

The nature of non-financial information; the absence of a significant body of established practice on which to draw; and the methods and precision used to determine non-financial information, allow for different, but acceptable evaluation and measurement techniques and can result in materially different measurements, affecting comparability between entities and over time. The Reporting Criteria has been developed to assist ABF Investments in reporting ESG information selected by ABF Investments as key KPIs to measure the progress of its ethical trade strategy. As a result, the Selected Information may not be suitable for another purpose.

In respect of the gradings of the audits as grade 1, 2 or 3, our assurance procedures were limited to agreeing the reported grading back to management’s gradings contained within Primark’s internal system to test if the grading has been extracted accurately from Primark’s data records. As set out in the Reporting Criteria, management apply Primark’s Supplier Code of Conduct and their judgement which takes account of less restrictive local regulatory and legislative requirements when determining the grading of the audits. We did not reperform any underlying audits to determine if the gradings applied were appropriate nor did we perform any procedures to assess the appropriateness of management’s judgement in determining the grading. Our work does not provide any assurance over the appropriateness of the gradings determined by management.

Directors’ responsibilities

The Directors of ABF Investments are responsible for:

- designing, operating and maintaining internal controls relevant to the preparation and presentation of the Selected Information that is free from material misstatement, whether due to fraud or error;
- selecting and/or developing objective Reporting Criteria;
- measuring and reporting the Selected Information in accordance with the Reporting Criteria; and

- the contents and statements contained within the Report and the Reporting Criteria.

Our responsibilities

Our responsibility is to plan and perform our work to obtain limited assurance about whether the Selected Information has been properly prepared, in all material respects, in accordance with the Reporting Criteria and to report to ABF Investments in the form of an independent limited assurance conclusion based on the work performed and the evidence obtained.

Assurance standards applied

We conducted our work in accordance with International Standard on Assurance Engagements (UK) 3000 *Assurance Engagements other than Audits or Reviews of Historical Financial Information* ("ISAE (UK) 3000") issued by the Financial Reporting Council. That standard requires that we obtain sufficient, appropriate evidence on which to base our conclusion.

Independence, professional standards and quality management

We comply with the Institute of Chartered Accountants in England and Wales ("ICAEW") Code of Ethics, which includes independence, and other requirements founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour, that are at least as demanding as the applicable provisions of the IESBA Code of Ethics. The firm applies International Standard on Quality Management 1 *Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements* which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Summary of work performed

A limited assurance engagement involves planning and performing procedures to obtain sufficient appropriate evidence to obtain a meaningful level of assurance over the Selected Information as a basis for our limited assurance conclusion. Planning the engagement involves assessing whether the Reporting Criteria are suitable for the purposes of our limited assurance engagement. The procedures selected depend on our judgement, on our understanding of the Selected Information and other engagement circumstances, and our consideration of areas where material misstatements are likely to arise.

The procedures performed included:

- conducting interviews with Primark's management to obtain an understanding of the key processes, systems and controls in place over the preparation of the Selected Information;
- selected limited substantive testing including agreeing a selection of the Selected Information to corresponding supporting information including reports of audits conducted by Primark or the International Labour Organisation ("ILO") which include the grading as determined by management, corrective action plans, and the ethical trading reporting database;
- performing analytical procedures over the aggregated Selected Information, including a comparison to the prior period's amounts having due regard to changes in business volume and the business portfolio;
- re-performing the mathematical calculation of the Selected Information in accordance with the Reporting Criteria; and
- reading the Report and narrative accompanying the Selected Information with regard to the Reporting Criteria, and for consistency with our findings.

The work performed in a limited assurance engagement varies in nature and timing from, and is less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

This report's intended use

Our report has been prepared for ABF Investments solely in accordance with the terms of our engagement. We have consented to the publication of our report on ABF Investments' and Primark's



website for the purpose of ABF Investments showing that it has obtained an independent assurance report in connection with the Selected Information.

Our report was designed to meet the agreed requirements of ABF Investments determined by ABF Investments' needs at the time. Our report should not therefore be regarded as suitable to be used or relied on by any party wishing to acquire rights against us other than ABF Investments for any purpose or in any context. Any party other than ABF Investments who obtains access to our report or a copy and chooses to rely on our report (or any part of it) will do so at its own risk. To the fullest extent permitted by law, KPMG LLP will accept no responsibility or liability in respect of our report to any other party.

KPMG LLP

KPMG LLP

Chartered Accountants

London

24 October 2023

The maintenance and integrity of ABF Investments' and Primark's website is the responsibility of the Directors of ABF Investments; the work carried out by us does not involve consideration of these matters and, accordingly, we accept no responsibility for any changes that may have occurred to the reported Selected Information, Reporting Criteria or Report presented on ABF Investments' or Primark's website since the date of our report.



Appendix 1

Selected Information	Value
Number of audits conducted	2,360
Most frequent non-compliances identified	Working Conditions
Percentage of Grade 1, 2 and 3 ratings for all sites audited	Grade 1: 2% Grade 2: 64% Grade 3: 34%