

PRIMARK

Modern Slavery Statement 2025

Contents

Introduction	2
About Primark	2
Governance	3
Primark Cares	4
Policies and advocacy	5
Due diligence	7
Due diligence to identify risk	7
Due diligence to prevent and mitigate risk	8
Transparency and traceability of our supply chain	10
Working with partners and stakeholders	12
Fair and safe working conditions	13
Remedy	14
Access to grievance mechanisms and remedy	16
Annexes	17
Annex I – Modern slavery in the global garment and footwear sector	18
Annex II – Key performance indicators	20
Annex III – Relevant worker-focused programmes and projects	23



Introduction

Modern slavery remains a serious risk in global supply chains, and at Primark our position is clear: we do not tolerate forced labour or child labour anywhere in our supply chain.

To uphold this commitment, we've put strong governance in place – from policies and procedures to training for our suppliers, partners and colleagues – all developed to ensure our standards are understood and followed. This has been the foundation of Primark's Ethical Trade Programme for more than 15 years, enabling us to spot issues early and take meaningful action whenever needed.

A key part of this work is making sure that workers and colleagues feel safe to speak up. That's why we continue to invest in measures that give people access to effective grievance mechanisms and the confidence to use them.

Our Modern Slavery Statement 2025 outlines how we put these commitments into practice through comprehensive risk assessments, due diligence and, when required, remediation. As our business grows and legislation evolves, we will continue strengthening our approach to protect workers throughout our supply chain.

Eoin Tonge
Primark CEO

February 2026

About Primark

Primark operates in 18¹ countries in Europe, the US and the Middle East, with more than 470 stores and employs more than 83,000 colleagues.

Founded as Penneys in Ireland in 1969, Primark is now an international fashion retailer which stands for great value without compromise, offering affordable fashion and everyday essentials that are made to last. We're built on a belief and passion for physical stores helping to bring high streets and

retail centres to life and creating joyful, social experiences. We're focused on driving positive change by giving clothing a longer life, protecting life on the planet and supporting the livelihoods of the people who make Primark products.

Primark is part of Associated British Foods plc (ABF), and for the purposes of the UK Modern Slavery Act 2015, it is also covered by the [ABF Modern Slavery Act Statement](#).



1. The number of markets in operation as at ABF's financial year end of 13th September 2025 was 17. Primark expanded to Kuwait in October 2025.
 2. As of end of September 2025.
 3. Tier one factories manufacturing finished goods in our supply chain.

4. Figures based on our Global Sourcing Map, updated in November 2025.
 5. Data runs to 31 December 2024. This number has been publicly assured by EY.



Governance

Governance and accountability

We have a comprehensive governance system to oversee sustainability and ethics, including modern slavery, covering all our Primark businesses. Our CEO and Senior Directors are responsible for, and central to, all decision-making and implementation. Relevant topics are fed into the wider business governance strategy as needed. Our parent company ABF provides further oversight.

Additional details can be found in our annual [Primark Sustainability and Ethics Progress Report](#).

Communicating our approach and impact

Communicating our approach and impact is important to us and the industry. We aim to be transparent in our efforts and to share our learnings.

- We publish this Modern Slavery Statement annually. All previous statements can be found on our [website](#). All ABF Modern Slavery Statements can be found [here](#).
- Additional details can be found in our annual [Primark Sustainability and Ethics Progress Report](#) and within the [ABF Annual Report](#).
- As a member of the [Ethical Trade Initiative \(ETI\)](#), we're assessed regularly on our due diligence. NGO KnowTheChain rates our performance in addressing the risk of modern slavery; their feedback can be [read here](#).
- We provide regular updates directly to ABF's shareholders, stakeholders (including multi-stakeholder initiatives and NGOs such as [Anti-Slavery International](#)), and regulators as relevant.



Over 130

Ethical Trade and Environmental Sustainability team members across our key sourcing markets

Primark Cares

Our work to pursue fair and safe working conditions for workers in our supply chain has been implemented through our Ethical Trade Programme for over 15 years. Our sustainability strategy, [Primark Cares](#), aims to build on these foundations and accelerate our commitment towards becoming a more sustainable business. Supported by our human rights due diligence work and guided by our [Supplier Code of Conduct](#), we aim to address vulnerabilities in our supply chain by:

Building financial resilience among workers

Promoting equal opportunities for women through skills development and addressing barriers to progression

Improving health and wellbeing

Improving access to effective grievance processes

PRIMARK

Sustainability and Ethics Progress Report 2024/25 Overview



[Click here](#) for more information on our Primark Cares strategy and our work to embed it within our business and supply chain.

Policies and advocacy

Our policies and approach

We have a number of policies covering our standards and commitments for how we, and our suppliers, conduct business. These policies align with industry standards, laws, and regulations, and in some cases go beyond these. We also have mechanisms that give individuals the ability to safely raise any issues and concerns around modern slavery.

Our Supply Chain Human Rights Policy

Our [Supply Chain Human Rights Policy](#) outlines our commitment to respect and uphold the human rights of the people in our supply chain and sets out our risk-based, worker-centric approach to due diligence, which is underpinned by the [United Nations Guiding Principles on Business and Human Rights \(UNGPs\)](#).

The policy sets out:

- Our commitments and contribution to the [UN Sustainable Development Agenda](#), and in particular Sustainable Development Goal 8 on Decent Work (to promote sustained, inclusive, and sustainable economic growth, full and productive employment, and decent work for all).
- Our commitment to ensuring effective grievance mechanisms are present and operational throughout our supply chain.
- How we enact the UNGPs, the [OECD Guidelines for Multinational Enterprises on Responsible Business Conduct](#), and the [OECD Due Diligence Guidance for Responsible Business Conduct](#).

Our Supplier Code of Conduct

Our [Supplier Code of Conduct](#) translates our human rights commitments into specific requirements we set for our suppliers.¹ The scope of our Supplier Code of Conduct covers our full supply chain including goods for sale, services (such as service providers, logistics and transportation) and goods not for sale (those goods that Primark uses for its own consumption). Our suppliers are responsible for and contractually bound to ensure compliance with the Supplier Code of Conduct in their whole supply chain and Primark has contractual audit rights with unrestricted access.

We require that our suppliers' factories communicate our Supplier Code of Conduct to all employees, and that all worker contracts are in the workers' own language. We translate and publish our Supplier Code of Conduct in 45 languages on our website. It was last updated in 2025.

In relation to forced labour, our Supplier Code of Conduct states:

Employment is freely chosen:

- There must be no forced or compulsory labour in any form, including bonded, indentured, trafficked, or prison labour and overtime must be voluntary.
- Any fees associated with the employment of workers must be paid by the employer.
- Workers must not be required to lodge any monetary deposits or their identity papers with their employer.
- Workers must be free to leave their employer after reasonable notice.

Auditing suppliers against our Supplier Code of Conduct

Primark's audit programme allows us to monitor conditions in our supply chain and support corrective action plans. This is a key component of our approach to human rights due diligence.

Our social audits are managed by our Ethical Trade and Environmental Sustainability team of 130 members, based in our key sourcing markets. This team is one of our most important resources in identifying and mitigating working conditions and human rights risks. They understand local regulations and are trained to identify risks and work with suppliers and factory management to drive workplace improvements. They also engage directly with workers in our supply chain and our external partners to understand the risks and root causes of such risks. This on-the-ground engagement adds an important additional layer of insight and visibility into working conditions and human rights risks within our supply chain.

Governance of this audit programme sits with Primark's Head Office. We bear the full cost of these audits, which are undertaken by Primark or a third-party on our behalf. Where any issues are identified through an audit, a corrective action plan is put in place, which outlines any areas for improvement and the agreed actions required to make those improvements. In regions where we have identified high or salient risks, we may implement additional due diligence activities. These could include our social impact programmes, such as our [My Life](#) programme for vulnerable migrant workers in India.

Any new factory producing goods for resale must undergo a social audit as part of our onboarding process. Primark conducts a pre-supply audit of all potential supplier factories during which we check adherence to the standards laid out in our Supplier Code of Conduct. No orders are placed until the factory has been audited and approved. Once a factory is approved to produce Primark products, Primark continues to assess the factory by conducting an audit at least once a year, with the majority of these audits being unannounced.

1. Our Supplier Code of Conduct is based on standards from the International Labour Organization (ILO) core conventions, Ethical Trading Initiative (ETI) Base Code and the Organisation for Economic Co-operation and Development (OECD) guidelines.

[Policies and advocacy continued](#)

Anti-bribery and corruption policy

As part of the ABF group, we've adopted ABF's [Anti-Bribery and Corruption Policy](#) and are committed to maintaining the highest standards of ethics and compliance wherever business is conducted, in line with all relevant legislation and local laws. The policy is also incorporated into our Supplier Code of Conduct and prohibits any form of bribery, including facilitation payments

All Primark colleagues and third-party service providers whose activities fall within the scope of this policy must complete online training at the start of their engagement and refresh it at regular intervals. Primark's suppliers are also required to maintain their own [anti-bribery and corruption procedures](#) within their own businesses.



Our approach to whistleblowing within Primark

We are proud to promote and protect our culture of trust, accountability and respect at Primark in line with our core values (Caring, Dynamic and Together). It is important that our colleagues feel empowered to report anything they believe to be inappropriate, illegal or dangerous.

We provide dedicated Speak Up phone lines and email addresses both within Primark and ABF. We encourage all colleagues working for Primark to use Speak Up, including colleagues at all levels, (directors, officers, part-time and fixed-term workers, casual and agency workers, seconded workers and volunteers.) This grievance mechanism allows for anonymous reporting and confidentiality is ensured, unless required otherwise by law, and anyone bringing a complaint will be protected from adverse repercussions, retaliation or detriment.

Where appropriate, we also encourage third parties who are associated with Primark to use Speak Up, including shareholders, agents, contractors, external consultants, third-party representatives, business partners and sponsors. Our Speak Up policy can be found on our website [here](#).

Further information on our approach to grievance mechanisms in our supply chain including Tell Us, our Primark-funded grievance channel for workers and stakeholders, can be found on p.12.

Advocating for effective policy and legislation on modern slavery

We support legislation and policy which aims to prevent and address the global risks of modern slavery. Such measures can support company-level efforts in tackling modern slavery and create a level playing field across the industry.

Legislation to address modern slavery has, and continues to be significantly strengthened. In addition to the UK Modern Slavery Act (2015), several important legal developments have emerged in recent years. These include the US Uyghur Forced Labor Prevention Act and the EU Forced Labour Regulation, along with broader legislative initiatives on responsible business conduct and due diligence at a regional and national level.

We engage with policymakers to share our experiences and learnings and support effective government-led measures. In the period under review, we have:

- Engaged with policymakers in the UK on addressing forced labour risks in global supply chains, including the Department for Business and Trade, the Foreign Commonwealth and Development Office and the Prime Minister's Office.
- Engaged in discussions and consultations on the Corporate Sustainability Due Diligence Directive (CSDDD), the Corporate Sustainability Reporting Directive (CSRD) and the EU Forced Labour Regulation through industry groups including EuroCommerce and Policy Hub.
- Held discussions with senior civil servants in the Department of Enterprise, Tourism and Employment in Ireland on supply chain traceability and transparency, in addition to supporting business readiness for implementation of the EU Forced Labour Regulation.

Due diligence to identify risk

We conduct due diligence to identify risks throughout our business, aligned with industry best practice. Our formal risk assessment process looks at inherent external risk, as well as internal sources of information, providing us with a view of both actual incidence and likelihood of risk occurring within our supply chain.

This approach draws on both external and internal sources, including:

- **External sources:** The risk assessment begins with an external view of risk, informed by credible third-party data, public reporting and stakeholder and media sources. These inputs provide national and local political, economic, social and legal context, and support an understanding of inherent country-level risks relevant to our supply chain.
- **Internal data:** Our local teams monitor our supply chain to assess compliance with our workplace standards and policies, and to help prevent and manage risk. This includes data from our social audit programme as well as data from investigations and cases raised through grievance mechanisms, whistleblowing channels, or internal monitoring activities.
- **Stakeholder engagement:** External stakeholders are vital sources of information and guidance. They help us to understand the risks in our value chain, how to identify them, and which groups may be most vulnerable. External stakeholders also assist in the development of strategies and approaches to prevent or resolve issues. Stakeholders are defined as those directly affected by the company's operations, value chain or products, and can include employees, workers, trade unions, individuals, and community members.
- **Rights holder consultation and worker engagement:** Workers are often excluded from the due diligence process or face obstacles in getting their voices and views heard. We have built trusted partnerships with local and regional stakeholders to give us ongoing insights into workers' needs.

Our local teams also regularly engage with factory management and workers. This provides important feedback about the issues they face, and the impact of our work with them. Worker interviews also form part of our social audit programme.

By using multiple different sources of information, we gain a more holistic understanding of risks. Where there is a severe and systemic risk of forced or child labour or other severe human rights abuses, we work with experts to conduct heightened or enhanced due diligence.

We outlined our approach on our due diligence to identify risks in more detail in our [Modern Slavery Statement 2023](#) (p21) and we continue to implement this approach today.

We conduct specific risk assessments covering all clauses in our Supplier Code of Conduct annually. In 2025, this assessment focused on all countries listed on our [Global Sourcing Map](#). We looked at risks on a country-by-country basis as we recognise there is legal, political and cultural variations in each country which may present different risks to workers in the workplace.

Insights from the risk assessment process enable our regional teams to review their plans for the coming year to ensure that we are investing in the right programmes to deliver the most impact for workers in our supply chain.



Due diligence to prevent and mitigate risks

Our approach to the prevention and mitigation of risks

We tailor our approach to preventing and mitigating modern slavery risks to the specific risk context and root causes, and we adapt our response according to our ability to influence outcomes.

We also use lessons learnt from experience, industry best practice and the expertise of our local teams to decide the most appropriate due diligence approach.

We engage stakeholders including suppliers, factory management and workers through a range of measures to prevent and mitigate risk. We participate in collaborative initiatives to increase our leverage and carry out research to help us better understand the challenges faced by workers and how interventions can be strengthened. Our approach is not limited to what we can achieve on our own and we are members of the [ETI](#), [Better Work](#), [International Accord](#) and [ACT](#) where we collaborate with industry peers and trade unions to increase our leverage and impact.

A core part of our approach focuses on developing and implementing programmes for workers to help them understand and exercise their rights, in partnership with local experts on the ground, such as My Life in India. Partnering with local experts is important so we develop effective programmes built around the needs of the workers. Many of our partners are grassroots civil society and development organisations and these partnerships have been built and fostered over the past decade, spanning our key sourcing markets.

We also work with factories and suppliers to support them to improve systems where needed. We use a variety of tools, including corrective action plans resulting from audits and interventions such as training and capacity building, such as My Journey in India. See p.9 for more detail.

In many cases, addressing modern slavery, particularly where the risks are endemic and systemic, requires a longer-term due diligence approach in consultation with many stakeholders including government, intergovernmental organisations, civil society and industry.

More details on our programmes can be found on p.23.

Training and awareness-raising programmes

Training and awareness-raising programmes are important tools within our business to help guide decision-making and to support the implementation of our programmes to address risks within the supply chain.

We deliver training directly to our colleagues in key roles to promote awareness and mitigate and prevent risks. Highlights from the year under review include:

- Primark training to nearly 1,400 colleagues on responsible purchasing practices.
- Primark training to nearly 400 suppliers and almost 600 colleagues from Buying and Merchandising on costing methods to identify and ring-fence labour costs.

Spotlight on responsible recruitment

Recruitment and hiring practices are one of the most common ways in which workers in all sectors are at risk of modern slavery. The ILO includes deception and debt bondage within the recruitment process as indicators of forced labour. We have taken the following steps to address this risk:

- We support the Employer Pays Principle, which means that no worker in the value chain should pay for their job, and that any costs associated with their recruitment must be paid for by the employer.
- Our suppliers are permitted to use agency and contract workers provided they are afforded the full rights as set out in our Supplier Code of Conduct. We provide training to suppliers to ensure they are aware of the risks and of our requirements.
- If recruitment fees are identified as having been paid by workers, suppliers are expected to reimburse such fees to workers.
- We may conduct additional due diligence on partners that hire migrant and contract or agency workers as these workers can be more vulnerable to recruitment practices that may result in forced labour. See p.18 for further detail.
- This year, we commissioned research to better understand the experience of migrant workers in India. See p.30 for detail.

Due diligence to prevent and mitigate risks continued

Migrant Worker Research, Vietnam

In 2025, Primark initiated a multi-stakeholder research partnership with the International Organization for Migration (IOM) to better understand recruitment and employment practices across its Vietnam supply chain. This focused on the experiences of internal migrant workers, especially women.

We know that meaningful worker insights require approaches that build trust and encourage openness, so we expanded the collaboration to include our long-term partner Women Win, global leaders in participatory, play-based methodologies, and their Vietnam partner, the Center for Creative Initiatives in Health and Population (CCIHP), whose contextual expertise was vital for local adaptation. Together, we co-designed a participatory version of “Draw the Line” methodology, building on evidence from previous programmes such as My Life in India, where creative, play-based engagement helped surface sensitive worker experiences more effectively than traditional research tools. This collective approach ensures the study reflects diverse expertise including international migration specialists, gender and participation experts, and local practitioners. This results in research that is more inclusive, robust, and grounded in worker realities.

The insights generated will inform oversight of recruitment processes, and social impact programming across our Vietnam supply chain.

My Journey, India

Primark’s ‘My Journey’ is a training and awareness programme focused on identifying and addressing the risks of modern slavery and forced labour in South India and North India.

The programme trains staff and workers in a factory involved in the recruitment and hiring of workers. It helps them understand the potential risks of forced labour involved in these processes, and how they can help to address them. For example, by making sure that all new recruits have contracts that they understand and that they have not paid recruitment fees to secure their job. The programme first launched in 2019 in South India which is a hub for spinning and fabric mills and many workers migrate there from different regions across India. Both local and domestic migrants have been identified as vulnerable and at risk of forced labour. Recruitment and hiring practices in respect of these migrant workers are therefore a key source of these risks. The programme expanded to manufacturing hubs in Delhi, North India in 2024. Migratory patterns to this region differ to those of South India, but similar risks of modern slavery and forced labour arising from recruitment practices have been identified. We continue to look at programme outcomes to determine how we can evolve this project in the future.



Transparency and traceability in our supply chain

Selecting suppliers that meet and share our standards

Our global supply chain is large and diverse and our tier one product supply chain spans 15 countries. We have several measures for supplier selection and ongoing due diligence in place, which we monitor and update as needed.

Unauthorised subcontracting by a supplier is strictly prohibited and constitutes a breach of our contracts with suppliers. We outline what constitutes unauthorised subcontracting as part of our onboarding process.

If unauthorised subcontracting is suspected, we conduct an unannounced assessment of the authorised site to verify. If unauthorised subcontracting is confirmed, the approved factory linked to this will not be able to receive orders from Primark until the supplier and the approved factory can demonstrate they have put in place measures to manage and prevent any further issues of unauthorised subcontracting. Our local team will also perform an assessment of the unauthorised sites to identify any violations.

This year, we continued training for buying colleagues to remind them of the core questions they need to pose to suppliers and sites in terms of capability and capacity.

We outline our approach to supplier selection in more detail in our [Modern Slavery Statement 2023](#) (p21) and continue to implement this approach.

Transparency and traceability of supply chain

We see transparency as a key enabler of traceability, providing the visibility required to identify all the links in our end-to-end supply chain for our products.

Traceability in a multi-tiered supply chain like ours is complex but we've created a programme to help improve the way we map our products' supply chain from raw material to finished product.

Tier one (finished goods)

Our Global Sourcing Map covers tier one factories that make our products, and the number and gender of workers at each site. The map is available [here](#).

Upstream (suppliers of fabrics and yarns)

Our goal is to build a system that enables real-time visibility and traceability of the fibres in our products all the way through our supply chain. We have partnered with traceability platform TrusTrace, to work towards this ambition. This began with cotton, as it is our most used fibre, and has since expanded to include more suppliers, fibres and products. We continue to train suppliers regularly on our traceability expectations and requirements. We know there's always more to be done to drive greater supply chain transparency, including adapting new technologies as they emerge.

Using the TrusTrace platform, we record the journey of our products from raw material to finished product. Over 230 of our suppliers are now using the TrusTrace mapping module to share detailed supply chain information. This includes 100% of our

clothing, textile and footwear suppliers, meaning we now have full visibility of these supply chains, from raw material to finished product.¹ Of those 230 suppliers, 100 have progressed to real-time traceability of purchase orders. Work is ongoing to onboard our remaining suppliers outside of clothing, textiles and footwear.

Upstream (suppliers of raw materials)

57% of the cotton clothing units sold this year contained cotton that was either organic, recycled or sourced from the [Primark Cotton Project](#), our unique training programme for cotton farmers in our supply chain.

We continue to train and support cotton farmers enrolled in the Primark Cotton Project in agricultural methods which aim to increase cotton yields, reduce farmer input costs and boost farmer profits. We built traceability into the programme to enable the tracing of cotton from farm to ginner to spinner. This is done using [CottonConnect's](#) digital traceability platform, [TraceBale](#).

We have a longstanding partnership with [Oritain](#), a global leader in forensic origin verification, who use forensic and data science to verify the cotton's source. Our Oritain verification programme tests the cotton at different points throughout the supply chain, providing selective additional checks over the origin of cotton from the Primark Cotton Project.

1. This includes suppliers up to Autumn/Winter 2025.

Transparency and traceability in our supply chain continued

The Primark Cotton Project

Since 2013, through our Primark Cotton Project, we've trained almost 310,000 cotton farmers in our supply chain on farming practices that help to reduce the environmental impact of growing cotton and strengthen farmers' livelihoods and resilience.

This initiative has evolved to become the largest programme of its kind by a single fashion retailer. Based on a curriculum devised by agronomic experts CottonConnect, the training is delivered through local partners in India, Pakistan and Bangladesh. Nine out of ten participants are smallholders¹ and over 80% are women.

Human Rights Due Diligence in the Primark Cotton Project

Over the last year, we have been working with Impactt, a consultancy firm specialising in understanding and managing human rights issues. This work has focused on building a human rights due diligence framework for the Primark Cotton Project, based on the [OECD Due Diligence Guidance](#) for Responsible Supply Chains in the Garment and Footwear Sector.

We've worked with CottonConnect to build a gap analysis and understand the roles and responsibilities of the different actors in the cotton supply chain. Impactt has also developed a monitoring framework, based on our Supplier Code of Conduct. This includes building out a methodology for field level assessments, an understanding of the different way our partners define the severity of risks and potential response pathways.

Recognising that our partners have the trust of Primark Cotton Project farmers and are therefore best placed to lead this work, we worked with Impactt to develop a training curriculum for our implementing partners on key decent work issues and relevant laws, as well as how to identify risks at farm level.

1. Based on a definition from ISEAL, a smallholder farm in the developing world is typically a family-owned enterprise that produces crops or livestock on two or less hectares.

The training was completed in January 2026, with the expectation that these skills will now be embedded in their operations and support us in understanding the key decent work risks faced by farmers.

Improving access to social security among smallholder cotton farmers

Smallholder farmers are often more vulnerable, encounter pressure on time and resources and may face multiple climate change challenges.

To address this, we've started a project with partners [Haqdarshak](#) and [Myrada](#) in India to support Primark Cotton Project farmers to access social security. We first needed to identify the barriers, so we interviewed over 1,500 women farmers in the Warangal and Mahbubabad districts. We learned that:

- 87% had limited awareness of the government schemes available to them. Among agricultural support schemes, most farmers were familiar only with the highest-profile programmes;
- Over 40% of women in both districts belonged to 'Scheduled Tribes' in India, which are more marginalised communities. However, the majority lacked the 'caste certificates' necessary to access special welfare schemes set up especially for them; and
- 67% identified a need to improve their digital and financial literacy skills, while 62% were deterred by the complex application processes.

As a result of these barriers, 48% of respondents have never benefited from any of the available government support schemes.

The research also assessed the most relevant agriculture-related government benefits farmers are entitled to but struggle to access. It prioritised subsidies that support farming activities, including those for tractor use and seed purchase.

Based on these findings, the next phase of the project will train 35 Field Executives from the Primark Cotton Project to support around 4,000 farmers to navigate the barriers identified. A first step will be to provide the farmers with digital and financial literacy training to help them access and make effective use of the benefits available.

We are also working with our long-term partner, the Self-Employed Women's Association (SEWA), to help the cotton farmers in Gujarat, India, form clusters that act as knowledge and support groups. These groups allow farmers to use their collective power to lower input costs, access credit and form market linkages. With our support, SEWA has selected and started to train 25 project farmers on setting up these hubs. The next step is to create the first cluster by identifying members and establishing the management structure.



Working with partners and stakeholders

Working with partners and stakeholders to increase leverage and improve standards

We work with trusted partners to help us build further understanding of issues and deliver greater impact within our business, supply chain or local communities.

This can range from scoping risks, understanding the nature and root causes of risks, working with partners to prevent and mitigate those risks through programmes and initiatives on the ground in our sourcing countries, to supporting workers getting access to effective grievance mechanisms.

These include partners from a range of organisations including membership groups, local and international NGOs, governments and unilateral and multi-stakeholder initiatives.

Read more about our partners on [our website](#). Additional information is included in the [Primark Sustainability and Ethics Progress Report](#).

My Life India

My Life Programme

The My Life programme, initiated by Primark in India in 2017, is designed to empower vulnerable migrant workers, particularly women, in the garment supply chain. The primary objective of the programme is to equip workers with essential life skills across three key areas: communication skills, knowledge of worker rights, and workplace health practices. The aim is to build resilience among workers, enabling them to navigate complex factory environments and mitigate the risks they face.

The programme was initially developed in partnership with local NGOs [Maitrayana](#) and the [Naz Foundation](#), and global NGO [Women Win](#). This partnership helped strengthen the initiative's ability to reach and effectively support the most vulnerable workers in the supply chain, particularly in the early years.

An independent assessment conducted by [60 Decibels](#), from a survey of 545 workers has highlighted the positive impacts of the My Life programme, particularly for the most vulnerable workers. For more information on our My Life programme, please see our [Modern Slavery Statement 2024](#) (p 13).



Fair and safe working conditions

Some issues related to fair and safe working conditions, such as living wages, purchasing practices, and freedom of association can contribute to, or are related to, ILO indicators of forced labour.

Financial resilience

We continue to drive initiatives which aim to build financial resilience in our supply chain, including pursuing a living wage for workers; driving financial literacy training and access to social protection. More information on this work can be found in our latest [Primark Sustainability and Ethics Progress Report](#).

Freedom of association and worker representation

Freedom of association enables workers to be aware of, and to exercise their fundamental rights at work, which we fully endorse. We also support the role of legitimate trade unions in achieving mature industrial relations and addressing labour disputes and grievances.

- Our [Supplier Code of Conduct](#) sets out the standards we expect of our suppliers around freedom of association and collective bargaining agreements.
- Through our social audit programme, we monitor and track alignment with our Supplier Code of Conduct, including whether the factory has a trade union or worker representation and how many workers are covered through collective agreements by a trade union or other means. We require factories to supply documentary evidence, a list of committee members and minutes of meetings, election procedures, and registers of any grievance or suggestion boxes during our audits.

- We participate in programmes such as [Better Work](#) which build and strengthen the capacity of workers and management to understand and participate in mature industrial relations and social dialogue. More details on these programmes can be found in the Annex (p.23).
- We engage and work directly with trade unions and other relevant stakeholders to resolve specific issues and grievances. Where necessary, we have sought the involvement of national Arbitration Councils, the ILO, and multi-stakeholder initiatives, such as the ETI, to resolve these issues.
- We are a founding member of Action, Collaboration, Transformation (ACT), an agreement between 18 global brands and IndustriALL Global Union in pursuit of living wages for workers in textile and garment supply chains. Updates on ACT's activities can be found on the [ACT website](#).

Working conditions in our European warehouses

During due diligence audits with our European warehousing partners, we identified vulnerable workers and potential forced labour indicators.¹ A deeper investigation led to the development of a comprehensive corrective action programme, including worker engagement sessions, a review of our warehousing partner's labour agency policies and processes, and enhanced management oversight.

Key interventions included the introduction of an agency coordinator to build trust, strengthened First Day and First Week inductions, and external training for our warehousing partner's workforce teams. These actions resulted in significant improvements in worker satisfaction with onboarding, clearer terms and conditions for agency workers and the availability of effective grievance mechanisms.

- Over 95% reported being happy in their roles
- Over 80% felt supported by their agency or job trainer

Our warehousing partner also introduced its own accommodation audit and management process, extending improvements beyond Primark-linked sites.

Reflecting on this process, key lessons included the importance of stronger involvement from warehouse partner management, improved communication between partner leadership and onsite teams, and the delivery of more robust partner policy frameworks. Overall, the corrective action programme addressed the identified forced labour indicators, strengthened confidence in both our direct partner and their recruitment agencies, and improved operational practices across the wider supply chain.

1. Forced labour indicators defined by the ILO: <https://www.ilo.org/publications/ilo-indicators-forced-labour-1>

Access to grievance mechanisms and remedy

It is important that people, organisations, workers and their representatives can raise grievances or breaches of our standards, including issues of modern slavery.

When grievances are raised, we take immediate steps to investigate while protecting the confidentiality of those raising the complaint, victims and anyone else who might be affected. We do not tolerate any retaliation against those who have raised the grievances and any affected stakeholders.

When needed, we work with specialist organisations and civil society to provide access to effective grievance mechanisms and on the investigation and remediation of grievances.

We track, monitor and report on the key performance indicators related to grievances. See Annex II, Key performance indicators (p.20).



Access to grievance mechanisms

We expect all Primark-approved factories to have effective grievance mechanisms available to their workers. We also work with third parties, including NGOs, to implement industry-wide grievance mechanisms in some of our sourcing countries.

We receive grievances through other channels, including the customer services section of our website, confidential worker interviews during social audits, and workers having direct contact with Primark colleagues and our partner organisations.

Developing our own grievance mechanisms

We launched [Tell Us](#), a Primark-funded independent channel designed to give workers or stakeholders across our value chain a way to raise concerns confidentially in 2023. Any conversation can be anonymous if desired and in the reporter's native language. Tell Us can be accessed by phone, web or smartphone app, making it easily accessible to all workers regardless of location.

Beginning in Bangladesh, Tell Us has now been extended to suppliers in most sourcing countries, covering both resale and non-resale goods. It is designed to complement factory-level grievance systems, trade union channels and independent hotlines.

Suppliers' own operational-level grievance mechanisms for their employees

Our [Supplier Code of Conduct](#) requires all suppliers to establish their own effective and accessible grievance mechanisms for their employees and management. We check whether our factories are compliant with this requirement and require suppliers to provide us with anonymised information on grievances that are registered with their grievance mechanisms.

The relevant clause in our Supplier Code of Conduct states:

Grievance Procedure

1. There should be a procedure that allows workers to raise and address workplace grievances, without fear of reprisal.
2. The procedure must be clearly communicated to workers at the time of their recruitment and be easily accessible to all workers and their representatives.
3. The grievance procedure must involve an appropriate level of management.
4. The management must address workers' concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned.
5. The grievance procedure must not be used to undermine the role of trade unions and collective bargaining processes and must not impede access to other existing judicial, arbitration or administrative procedures.

Remedy and Access to grievance mechanisms and remedy continued

Independent grievance mechanisms

We work with civil society and other organisations to develop and support independent and bespoke grievance mechanisms for workers in our supply chain.

Primark seeks to ensure these mechanisms do not undermine supplier's own operational level grievance mechanisms for their employees or those set up by worker committees or trade unions. We review these mechanisms regularly to ensure they are effective for the workers they are intended to support.

Examples of these mechanisms include:

- **Amader Kotha, Bangladesh:** The Amader Kotha Helpline is an independent, industry-wide grievance mechanism implemented by project partners [Clear Voice](#), a project of the Cahn Group, civil society organisation [Phulki](#), and [LRQA](#). This year, we carried out a review of Amader Kotha to better understand its effectiveness and how we can work on the continuous improvement of it. This work has been undertaken in partnership with programme partners and [The Remedy Project](#). The review involved interviewing stakeholders of the Amader Kotha Helpline, which includes the operators that manage the calls from workers. It has also involved collecting confidential feedback from workers that have used the helpline. By using this and other evidence, we are assessing the effectiveness of Amader Kotha using the UNGP's effectiveness criteria.
- **Hamary Awaz, Pakistan:** The Hamary Awaz Helpline is implemented by project partners [Clear Voice](#), a project of the Cahn Group, civil society organisation [Baidarie](#) and [LRQA](#). Training and other support is provided by NGO [Phulki](#).

- **Ungal Kural, India:** Ungal Kural in India is an external and independent grievance mechanism which provides workers with a trusted, accessible way to raise concerns. Through the pilot helpline, workers report on substantive issues in their factories, including health and safety concerns, wage compensation, leave, termination and other general inquiries. This year, working with [LRQA](#) and [Change Alliance](#), we've continued with the pilot to refine our approach to implementing independent, in-country grievance mechanisms. We are also working to build robust partnerships on the ground to support the future success of this project.
- **Handshake Workers' Hotline, China:** We have piloted this mechanism in our suppliers factories in partnership with [INNO](#). Throughout 2026 we will continue this pilot allowing us to carefully consider methods to best support workers' access to independent grievance mechanisms in China.
- **Industry sectoral mechanisms:** Primark is also a member of multi-stakeholder initiatives [ACT](#) and the [RMG Sustainability Council](#) which provide access to sectoral grievance mechanisms.

Providing remedy

Under the OECD Due Diligence Guidance, companies are expected to provide for, or cooperate in, the remediation of harms where they have caused or contributed to that impact. We seek to ensure that any provision of remedy is satisfactory to those affected and seek to involve them in the design of the remedy. We share information on our experiences and the challenges of effective remedy within our sector, through reports to stakeholders and through industry forums such as the ETI, BetterWork, and ACT.



Tracking and monitoring

We monitor the steps we take to address modern slavery by tracking indicators including:

- Factory non-compliances against our Supplier Code of Conduct.
- Factories which participate in external independent grievance mechanisms.
- Recorded grievances received and resolved, both across all issues and those specifically related to modern slavery.
- The number of initiatives (programmes and projects) implemented across factories in our supply chain.

All our programmes and projects are reviewed through a Monitoring, Evaluation and Learning (MEL) framework. We also work with social impact measurement experts 60 Decibels to strengthen our measurement approach and to understand the effectiveness of our programmes in line with international best practice. See Annex II, Key performance indicators (p.20).



PRIMARK

Annexes

Annex I – Modern slavery in the global garment and footwear sector

Global risks within the garment sector

Our due diligence process has identified potential and actual risks of modern slavery within our industry. Many of these risks are systemic and endemic to a particular region, country or worker population and are also present in other sectors and industries. We have outlined steps we are taking as part of our due diligence process to prevent and mitigate these risks.¹

Agency labour in supply chains

Workers hired through agency and labour providers can be particularly at risk of modern slavery.

Our actions taken to address these risks:

- Programme of enhanced due diligence of agency and labour providers including in production, logistics providers, warehouses and recyclers, security providers, cleaning services, across both goods for resale and goods not for resale.
- Adapted audit programme to identify risks based on the current context in each country.
- Corrective action programmes at individual site level.

Cotton

In many cotton-producing countries, temporary and migrant workers employed by cotton farmers can be at high risk of indentured and bonded labour and child labour. Risks of forced labour also exist within the cotton value chain and across some of the regions where cotton grows.

Our actions taken to address these risks:

- Our suppliers are banned from using Uzbek cotton in the manufacturing of any of our products. We signed the [Responsible Sourcing Network Cotton Pledge](#) in 2015, and in 2016 extended the pledge to cover Turkmenistan.
- In 2019, we stopped sourcing cotton from the Xinjiang region in China. We remain committed to this position and its enforcement.
- Our suppliers must complete supply chain mapping for Primark products back to country of origin of the cotton. If a product is found to contain cotton originating from Turkmenistan, Uzbekistan or Xinjiang, we will take immediate action and reserve the right to review our business relationship with any suppliers of such product. Any stock found to be in violation of these requirements will not be accepted by Primark.
- We continue to operate within all relevant regulations in the markets where we retail and from which we source.
- We have prioritised the traceability of cotton within our Primark Cotton Project. Further details can be found on p.11.

Migration from Ukraine

Workers fleeing conflict from Ukraine could potentially be at risk of exploitation in destination countries. We continue to monitor migrant worker populations and, after an initial influx, have seen the number of Ukrainian migrants level out across UK sites. However we continue to see rising numbers in Eastern Europe.

Spinning mills and factories in South India

Migrant workers, including young women, can be at risk of forced labour in spinning mills and factories in South India. There are some inherent socio-economic drivers that create these vulnerabilities, including limited knowledge of rights and education, economic choices and issues of communication due to language barriers. Those from lower castes or marginal ethnic groups are particularly at risk.

Our actions taken to address these include:

- Implementation of the My Journey programme in mills to address recruitment and hiring practices; See p.9 for further detail of the programme.
- Support for various factory-level programmes and multi-stakeholder sectoral initiatives with brands, local and national civil society groups, suppliers, factories and other associated experts and partners.

1. This is not intended to be a complete map of all inherent risks that Primark has identified across its global value chain but indicates some of the major forced labour risks present across the sector.

Annex I – Modern slavery in the global garment and footwear sector continued

Migration into Türkiye

Undocumented foreign workers in Türkiye, including refugees from Syria, Afghanistan and other Middle Eastern countries, are at high risk of forced labour and poor working conditions. Our actions taken to address these risks include:

- Monitoring these risks through audits and factory checks at factory and subcontractor level.
- Corrective action programmes at individual factory level where issues are identified.

Gulf Cooperation Council (GCC)

Primark opened our first store in Kuwait in October 2025 in partnership with the Alshaya Group, a leading retail franchise operator in the Gulf Cooperation Council (GCC) region, with further stores planned to open in 2026. In line with the requirement for our suppliers, the Alshaya Group has agreed to comply with the principles set out in our Supplier Code of Conduct.

There are known risks to migrant workers in GCC linked to recruitment processes, as well as health and safety at work and in workers' accommodation. Ahead of opening our first stores in the GCC region, we conducted a review of each country involved in the franchise plans to understand relevant legal frameworks, working conditions and recruitment practices. We also built up our understanding of local labour experts and workers associations.

Based on this research, and working closely with the Alshaya Group with their local knowledge of the region, we're developing consistent and aligned approaches to due diligence for these new supply chains. For example, through standard operating procedures, policies, and audit protocols, with the aim of increasing transparency through the Alshaya local supply chain and agency worker agreements. We continue to share insights and suggested best practice in this area, as well as engage collaboratively with local stakeholders.

Annex II – Key performance indicators

Through our due diligence programme, we monitor the steps we take to address the risk of forced labour indicators by tracking the following indicators.

Audit indicators¹

- 98%² of tier one suppliers' factories were audited
- 91% of audits were unannounced, excluding initial approval audits, which are always unannounced
- 2,468 audits were conducted³
- Of all non-compliances, 0.29% fell under the 'Employment is Freely Chosen' condition of our Supplier Code of Conduct
- Of non-compliances that fell under the 'Employment Freely Chosen' condition of our Supplier Code of Conduct, 53% were resolved
- 53 incidents of unauthorised sub-contracting were identified

Initiatives supporting the development of worker representation through democratically elected bodies⁴

We supported two initiatives focused on strengthening industrial Relations, one in Bangladesh and Cambodia, which encourage worker representation through democratically elected bodies, across 22 participating factories.


- Industrial Relations Training Cambodia
- Industrial Relations Training Bangladesh





1. For the calendar year 2024, 1 January – 31 December 2024.
2. 2% of factories were not audited during this period due to planned deactivation.
3. Data as per year end of 31 December 2024.
4. For reporting period 1 August 2024– 31 July 2025.


Annex II – Key performance indicators


Supporting workers to access external independent grievance mechanisms¹


Country	 Bangladesh
Mechanism	Occupational Safety and Health (OHS) Complaints Mechanisms
Provider	Bangladesh RMG Sustainability Council
Coverage across Primark’s supply chain	161 factories
Number of issues reported	27 issues reported. 26 were resolved, 1 was outstanding.

Country	 Bangladesh
Mechanism	Amader Kotha Helpline
Provider	Cahn Group, Phulki, LRQA
Coverage across Primark’s supply chain	195 factories
Number of issues reported	3,776 issues reported. 3,733 were resolved. 43 were outstanding.

Country	 Pakistan
Mechanism	Hamary Awaz
Provider	Cahn Group, Baidarie, LRQA, Phulki
Coverage across Primark’s supply chain	28 factories
Number of issues reported	376 issues reported. 365 were resolved, 11 were outstanding.

Country	 Bangladesh
Mechanism	ACT Interim Dispute Resolution Mechanism (DRM)
Provider	ACT, Bangladesh Apparels Workers Federation (BAWF), National Garment Workers Federation (NGWF), Akota Garments Workers Federation (AGWF)
Coverage across Primark’s supply chain	142 factories
Number of issues reported	1 case was carried over from before the reporting period. 4 new issues were received. 3 were resolved, 2 were outstanding.

Country	 Türkiye
Mechanism	Worker Support Centre
Provider	MUDEM
Coverage across Primark’s supply chain	65 factories
Number of issues reported	16 issues reported. 13 were resolved, 3 were about inactive factories so were not in scope for investigation.

Country	 India
Mechanism	Ungal Kural
Provider	LRQA and Change Alliance
Coverage across Primark’s supply chain	15 factories
Number of issues reported	39 issues reported. 36 were resolved, 2 outstanding. 1 was not resolved as the complainant couldn’t be contacted.

Country	 China
Mechanism	Handshake Workers’ Hotline
Provider	INNO
Coverage across Primark’s supply chain	100 factories
Number of issues reported	32 issues were reported. ¹

1. Information on grievances is provided by third party providers and is not assured by Primark. Data on issues received relates to the period 1 August 2024 – 31 July 2025.

2. Data on cases resolved and pending was not provided by the third party.

Annex II – Key performance indicators

Data on grievances received through Primark grievance mechanism channels¹

Data on grievances 1 August 2024 – 31 July 2025

Grievances related to clauses of our Supplier Code of Conduct

Open/Pending	Resolved	Total
11	85	96

Tell Us Grievance mechanism

Open/Pending	Resolved	Total
3	32	35

Grievances specifically related to issues of forced labour²

Open/Pending	Resolved	Total
2	19	21

Tell Us grievances specifically related to issues of forced labour³

Open/Pending	Resolved	Total
1	11	12

1. Figures are based on grievances raised through Primark channels including those raised to Tell Us, auditors or through the customer service section of our website. All calculations are based on unique cases only, regardless of trigger. All have been identified as grievances. Figures do not include data from external independent grievance mechanisms which are reported elsewhere in this report.

2. Forced labour data has been calculated by identifying 'Forced Labour' in a text field.

3. Forced labour data has been calculated by identifying 'Forced Labour' in a text field.

Annex III – Relevant worker-focused programmes and projects

Better Work, Cambodia, Indonesia, Vietnam (2011 – present)

Primark is a partner member of the Better Work programme which operates in key sourcing countries. Better Work conducts monitoring of sites and provides capacity building for management.

Partners: ILO Better Work, IFC

Amader Kotha, Bangladesh (2020 – present)

Amader Khota is a grievance mechanism in Bangladesh. See p.16 for further detail on our approach to grievance mechanisms.

Partners: The Cahn Group, Phulki, LR

Industrial Relations Training, Bangladesh (Jan 2023 – present)

Developed in partnership with Just Solutions, the training programme aims to build the capacity of factories in the area of industrial relations.

Partner: Project led by Primark

Handshake Worker's Hotline, China (November 2023 – present)

Handshake is a grievance mechanism in China. See p.16 for further detail on our approach to grievance mechanisms.

Partner: INNO

My Life, India (2017 – present)

My Life supports factories to train workers in basic life skills, including health and safety in the workplace, rights and responsibilities, communication, and teamwork. See p.12 for further detail on this programme.

Partners: Women Win, Maitrayana Charity Foundation

My Journey, India (2019 – present)

My Journey trains all staff and workers in a factory who are involved in recruitment and hiring of workers to help them understand the potential risks of forced labour involved in these processes, and how they can help to address them. See p.9 for further detail on this programme.

Partners: Project led by Primark

Ungal Kural, India (June 2023 – present)

Ungal Kural is a grievance mechanism in India. See p.17 for further detail on our approach to grievance mechanisms.

Partner: Elevate

Migrant Worker Research, India

This year, we are engaging stakeholders through a research process to better understand migrant worker experiences outside of the factory walls, the existing mechanisms in place to protect and support migrant workers, and opportunities to better support migrant workers.

Partners: Association for Stimulating Know How (ASK)

Hamary Awaz, Pakistan (June 2023 – present)

Hamary Awaz is a grievance mechanism in Pakistan. See p.17 for further detail on our approach to grievance mechanisms.

Partners: The Cahn Group, Baidari, LRQA, Phulki

Migrant Worker Research, Vietnam (2025)

In partnership with the IOM, we are undertaking research in Vietnam to understand migrant workers' experiences, and the steps that could be taken to better support them in the workplace.

Partner: International Organisation for Migration

PRIMARK

Primark Modern Slavery Statement 2025

<https://corporate.primark.com/en-gb/modern-slavery-statement>