

PRIMARK CODE OF CONDUCT 2025

1. Employment is freely chosen

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

2. Freedom of Association and Right to Collective Bargaining

- 2.1 All workers have the right to join or form trade unions of their own choosing and to bargain collectively.
- 2.2 Employers will adopt an open attitude towards the activities of trade unions and their organisational activities.
- 2.3 Workers' representatives must not be discriminated against and must have access to carry out their representative functions in the workplace.
- 2.4 Where the right to freedom of association and collective bargaining is restricted under law, Employers will facilitate, and must not hinder, the development of parallel means for independent and free association and collective bargaining.
- 2.5 Individuals who represent workers should do so willingly, and be freely and transparently elected, without influence from any other party.

3. Working Conditions are safe and hygienic

- 3.1 Employers must provide a safe and hygienic working environment, bearing in mind the prevailing knowledge of the industry and of any specific hazards. This includes the physical structure of the buildings and facilities used.
- 3.2 Through policy and procedure employers must take adequate steps to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work.
- 3.3 Employers must appoint a senior management representative to be responsible for ensuring a safe and healthy workplace environment.

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- 3.4 Workers must receive regular and recorded health and safety training and such training will be repeated for new or reassigned workers.
- 3.5 Access must be provided to clean toilet facilities and to clean drinking water. If appropriate, clean and safe facilities for the preparation, consumption and storage of food should be provided.
- 3.6 Employers must provide access to adequate medical assistance and facilities in the event of illness or injury at work.
- 3.7 Accommodation, where provided, must be chosen by the worker, be clean, safe and meet their basic needs.

4. Child Labour must not be used

- 4.1 There must be no recruitment or employment of child labour.
- 4.2 In any given country the minimum working age, as well as rules regarding the employment of a Young Worker will be defined by the conventions of the ILO or national/regional law, whichever affords greater protection to the individual.

For clarity, Young Worker in this context refers to an individual above the legal working age but before their 18th birthday.
- 4.3 Companies must have policies and programmes which prevent the recruitment and employment of child labour.

5. Living Wages are paid

- 5.1 Wages and benefits paid for a standard working week must meet, as a minimum, the national minimum wage, or in the absence thereof an acceptable industry benchmark. In any event, wages must always be enough to meet basic needs and to provide some discretionary income. Primark actively supports moves to ensure that the minimum wage is determined by national collective bargaining at industry level.
- 5.2 All Workers must be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- 5.3 Deductions from wages as a disciplinary measure or any deductions from wages not provided for by national law are not permitted without the express permission of the Worker. All disciplinary measures must be recorded.

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- 5.4 Overtime hours must always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.
- 5.5 Overtime and benefits should be paid in the period worked.

6. Working Hours are not excessive

- 6.1 Working hours must comply with national laws and benchmark industry standards, whichever affords greater protection.
- 6.2 Standard working hours, excluding overtime, must be defined by contract and must not exceed 48 hours per week*.
- 6.3 Overtime must be used responsibly, taking into account the extent, frequency and hours worked by individual workers and the workforce as a whole.
- 6.4 Total hours worked including overtime, must not exceed 60 hours in any 7 day period unless there are exceptional circumstances. In such cases, all of the following conditions must be met:
- This is permitted by national law;
 - This is permitted by a collective agreement freely negotiated with a workers' organization representing a significant portion of the workforce;
 - Appropriate safeguards are taken to protect Workers' health and safety; and
 - The Employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.
- 6.5 Workers must be provided with at least 1 day off in every 7 day period or, where permitted by national law, 2 days off in every 14 day period.

**International standards recommend the progressive reduction of standard hours of work (excluding overtime), when appropriate, to 40 hours per week, without any reduction in workers' wages as hours are reduced.*

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7. No Discrimination is practised

- 7.1 There must be no discrimination of Workers including, but not limited to, hiring, occupation, compensation, access to training, promotion, termination or retirement based on but not limited to race, caste, colour, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

8. Regular Employment is Provided

- 8.1 To every extent possible, work performed must be on the basis of a recognised employment relationship established through national law and industry practice.
- 8.2 Obligations to Workers under labour or social security laws and regulations arising from the regular employment relationship must not be avoided through the use of labour-only contracting, sub-contracting, home-working arrangements or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor must any such obligations be avoided through the excessive use of fixed-term contracts of employment.
- 8.3 Overtime must not be used to replace regular employment.
- 8.4 Contract termination must be based on a process which is fair, transparent and consistent with the requirements of local law, and which is communicated to relevant workers clearly.

9. No Harsh or Inhumane Treatment

- 9.1 There must be no physical abuse or discipline, threat of physical abuse, sexual or other harassment, verbal abuse or other forms of intimidation including a hostile or offensive work environment.

10 Environmental Responsibility

- 10.1 Suppliers must comply with all applicable local laws and regulations regarding the protection and preservation of the environment. This includes obtaining and maintaining all required environmental permits, approvals and registrations.

For more information please read the Environmental Policy [here](#).

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11 Legal Requirements

- 11.1 Primark is committed to the laws and regulations in each procurement location where it conducts business, and will not knowingly operate in violation of any such law or regulation.
- 11.2 Where the requirements of this Supplier Code of Conduct set a higher standard than is required by local laws and regulations, suppliers must align with the requirements of this Supplier Code of Conduct.

12 Grievance Procedure

- 12.1 There should be a procedure that allows workers to raise and address workplace grievances, without fear of reprisal.
- 12.2 The procedure must be clearly communicated to Workers at the time of their recruitment and be easily accessible to all Workers and their representatives.
- 12.3 The grievance procedure must involve an appropriate level of management.
- 12.4 The management must address Workers' concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned.
- 12.5 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.

13 No Bribery or Corruption will be tolerated

- 13.1 The offering, paying, soliciting or accepting of bribes or kick-backs, including facilitation payments, is strictly prohibited. A bribe may involve giving or offering any form of gift, consideration, reward or advantage to someone in business or government in order to obtain or retain a commercial advantage or to induce or reward the recipient for acting improperly or where it would be improper for the recipient to accept the benefit.

Bribery can also take place where the offer or giving of a bribe is made by or through a third party, e.g. an agent, representative or intermediary.

Some examples of bribes are as follows. This is not an exhaustive list:

- gifts, or travel expenses

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- the uncompensated use of company services, facilities or property
- cash payments
- loans, loan guarantees or other credit
- the provision of a benefit, such as an education scholarship or healthcare, to a member of the family of a potential customer/public or government official
- providing a sub-contract to a person connected to someone involved in awarding the main contract
- engaging a local company owned by a member of the family of a potential customer/public or government official.

13.2 Facilitation payments are small payments or fees requested by government officials to speed up or facilitate the performance of routine government action (such as the provision of a visa or customs clearance). Such payments are strictly prohibited.

13.3 Suppliers, representatives and their employees must comply with all applicable anti-bribery and corruption laws. If no such anti-bribery or corruption laws apply, or are of a lesser standard to that prescribed in the UK Bribery Act 2010, suppliers, representatives and their employees must adhere to the UK Bribery Act 2010.

13.4 Suppliers and representatives must have in place anti-corruption and bribery procedures to prevent employees or persons associated with its business from committing offences of bribery or corruption. Suppliers and representatives will properly implement these procedures into their business and review them regularly to ensure that they are operating effectively.