

Primark Ltd. Modern Slavery Statement 2018

Primark Ltd.'s third Modern Slavery Act statement covers our activities in respect of the requirements under the UK Modern Slavery Act 2015 for the financial year ending September 2018 and builds on our 2016 and 2017 statements.

Our commitment to fighting modern slavery

At Primark, we believe that business can be a force for good if it acts responsibly towards those within its supply chain. We consider modern slavery to be one of the most salient risks within the global garment and textile sector and are committed to preventing and addressing modern slavery in line with the UN Guiding Principles on Business and Human Rights.

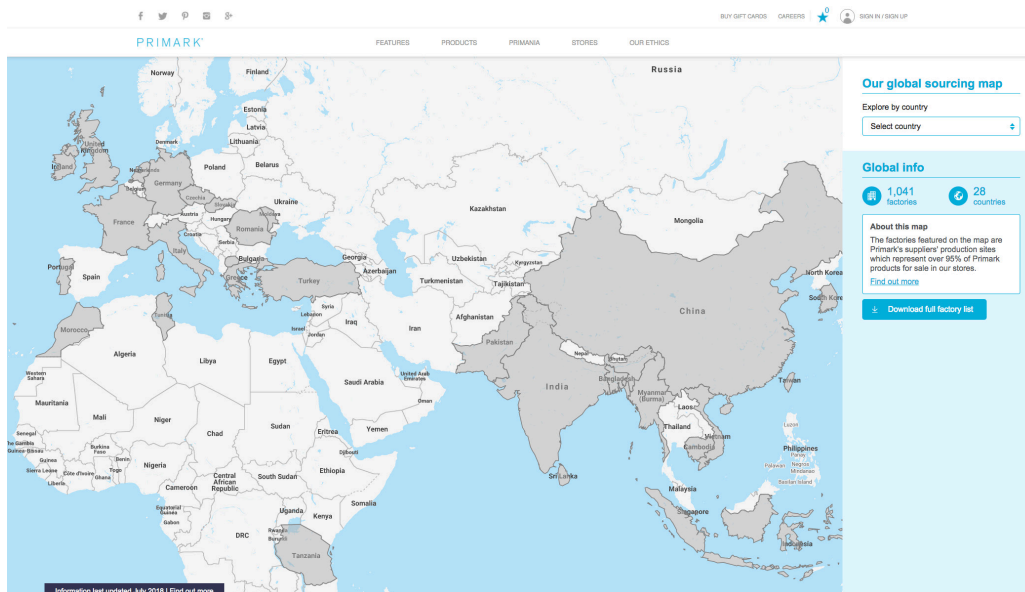
Key developments in 2018

Transparency

Forced and trafficked labour is one of the most adverse human rights impacts, and this has been reflected in the increase in and revision of regulation that attempts to address the issue including: the California Transparency in Supply Chains Act; EU regulations on reporting; the UK Modern Slavery Act 2015; and the ILO Protocol on Forced Labour.

In 2018, we published our Global Sourcing Map which shows information on Primark's suppliers' production sites which represent over 95% of Primark products for sale in Primark stores. Details relate to those factories that have been working with Primark for more than a year and include factory names, site addresses and the number of workers and gender split of the workforce.

<https://globalsourcingmap.primark.com/>



Our global sourcing map

Collaboration

Primark continues to work with international and local partners to expand its leverage and influence. We strive to make a positive impact on all the lives we touch.

This year, we have worked to map these collaborations across our key focus areas:

Awareness raising

We continue to focus on training and awareness raising. In addition to supporting our workforce to understand the risks of modern slavery, we proactively provide over 7,000 hours of training per year for our suppliers to help them implement the Primark Supplier Code of Conduct. This year we have also engaged over 700 suppliers and factories in the supply chain in understanding and addressing the risks of modern slavery.

Governance and best practice, overall policy and guidance	Child and Forced Labour	Decent Work	Worker Empowerment
OECD Advisory Group on Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector, Ethical Trading Initiative (ETI), Partnership for Sustainable Textiles, Business for Social Responsibility (BSR), Sustainable Apparel Coalition (SAC), Business Fights Poverty, Social Accountability International (SAI), Business Network for Civic Freedoms and Human Rights Defenders	Cotton Campaign Pledge), ILO-IPEC, ILO-IPEC Child Labour Platform, OECD Due Diligence Responsible Business Conduct (India), Impactt, Anti-Slavery International, ETI (Modern Slavery Working Group), ETI (Tamil Nadu Multi-Stakeholder Programme), SAVE, Mudem, CYDD, CCR-CSR	Bangladesh Accord on Building and Fire Safety, Action, Collaboration, Transformation on Living Wages (ACT), ILO Better Work, SAC, SAI, Myanmar Centre for Responsible Business, Impactt, Mott McDonald, Partnership for Sustainable Textiles (Grievance Mechanisms), ETI (Social Dialogue), Elevate, TRN, TUV SUD, Innovatus, UL, NUK/SCIB	DFID, UN Women, SEWA, Cotton Connect, BSR (HERproject), ETI (Tamil Nadu Multi-Stakeholder Programme), ACT, Women Win, Microbenefits, Carnstone, SHEVA, St Johns Medical College, Sudhershana Rao Sarde, Elevate, Naz Foundation, SWASTI, Girl Determined, Palladium, Reeds

Overview

About our business and supply chains

Primark is a major retail group employing over 77,600 people. Primark's product range includes womenswear, lingerie, childrenswear, menswear, footwear, accessories, hosiery, beauty and homeware. We operate 363 stores in 11 countries including the UK, Republic of Ireland, mainland Europe and the USA. We are headquartered in Dublin, Republic of Ireland.

Our operations and logistics include warehouses and distribution centres. We recognise that there is also a risk of modern slavery within these parts of our supply chain, and are taking steps to strengthen our approach to the risks in this sector. We audit all warehouses and distribution centres, those being used by our suppliers, and those providing logistics support to Primark, including our own warehouse in Islip.

We source our products from approximately 700 first-tier suppliers in a range of countries including China, Bangladesh, India, Vietnam and Turkey.

Our business also sources goods not for sale, such as fittings and fixtures for our stores. We do not own the companies or factories that produce our goods, but recognise that we have a role to play in ensuring that our products are made in good working conditions.

All Tier 1 factories producing for Primark must be audited annually against our Supplier Code of Conduct. In 2017, we carried out 3,420 audits.

Orders can only be placed with a factory once it is operating to a standard that meets the requirements set out in our Code of Conduct, and it is approved by the Primark Ethical Trade team. Tier 1 suppliers are also required to apply our Supplier Code of Conduct to their own supply chain.

Suppliers must ensure that they do not knowingly source components or materials for use in Primark products that are made using forced or trafficked labour. We recognise that modern slavery is equally or more likely to occur in the lower tiers of our supply chain and that our leverage to address such issues decreases at this level due to the indirect nature of the relationship between Primark and these suppliers. We are taking additional steps to identify and address these risks, both directly and in collaboration with other stakeholders, by taking actions such as reviewing our approach to raw materials in our supply chain.

Our partners

Collaborating with other stakeholders on the issues facing the garment and textile industry enables us to increase our leverage and make lasting, sustainable changes. Building on existing collaborations and creating new alliances is critical if we are to make a lasting impact, particularly on complex issues such as modern slavery. Examples of our collaborations and partnerships are set out below, and further information is available on the Partners page of the Primark website <https://www.primark.com/en/our-ethics/partners>

Primark is a member of the Advisory Panel of the OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector.

The Guidance, which was approved in 2017, outlines the process of identifying and addressing issues in the garment and footwear sector, including forced labour. The guidance was developed to be practical, and emphasises the need for collaborative constructive approaches to complex challenges. We have continued to work with the OECD in 2018 on tools to help companies assess and align their due diligence programmes with the guidance. <http://mneguidelines.oecd.org/oecd-due-diligence-guidance-garment-footwear.pdf>

Primark is a founder member of an initiative of major global brands and retailers which aims to contribute towards the prevention and mitigation of harmful impacts on the workers in the spinning mill industry in South India, and particularly in Tamil Nadu.

The OECD is collaborating on this initiative and providing technical assistance as part of its sector work on due diligence and responsible business conduct within the garment and footwear sector.

Primark has been a member of the Ethical Trading Initiative (ETI) since 2006 and has held leader status since June 2011.

The ETI has played an important role in calling for improved enforcement and regulation on modern slavery. Primark is also a member of the Steering Committee of the ETI's Tamil Nadu Multi Stakeholder Programme (TNMS).

During 2018, Primark has also worked with Anti-Slavery International and Impactt Ltd specifically on recruitment processes as a driver of modern slavery within the global textile supply chain.

Policy

Supplier Code of Conduct

Primark's Code of Conduct is a set of core principles that all suppliers must commit to meeting as a condition of doing business with us. The Code of Conduct applies across our entire supply chain, including the procurement of goods not for resale (such as store fittings), service providers, logistics, and transportation, and forms part of our General Terms and Conditions of Business.

The Code is based upon international best practice, including the ETI Base Code and the ILO Declaration on Fundamental Principles and Rights at Work.

This year, we have revised the code to include indentured labour, zero recruitment fees in line with the employer pays principle, along with other updates including grievance mechanisms. Our updated Code of Conduct will be published in 2018.

Primark's Supplier Code of Conduct is reviewed regularly to ensure it remains current and fit for purpose. We also benchmark the Supplier Code of Conduct against other relevant codes of practice and regularly consult with our internal and external stakeholders.

The Boards of Primark and its parent company ABF have oversight and responsibility for the Code of Conduct. Primark's Ethical Trade and Sustainability Director has responsibility for its development and implementation and reports to both the ABF Director of Legal Services and Company Secretary, and the Chief Executive of Primark.

Policy

Implementation of the Code of Conduct

We publish the Code in 42 languages and our local Primark Ethical Trade teams on the ground in key sourcing regions provide over 7,000 hours of support and training annually to help suppliers understand the Code and how to implement it. <http://www.primark.com/en/our-ethics/workplace-rights/code-of-conduct>

The Primark Ethical Trade team audit every Tier 1 factory against the Code of Conduct prior to approving it for production. Only when a factory is approved by the Primark Ethical Trade team to a standard that meets our minimum requirements can orders for production be placed. Once a factory is approved, it is then subject to regular unannounced audits and monitoring to help the factory maintain compliance and continue to improve. Our Tier 1 suppliers are responsible for ensuring compliance and implementation across their suppliers and contractors.

Primark pays directly for all its audits. This enables us to retain control of the audit protocol, quality and integrity. Suppliers receive the corrective action plan (CAP) but the final full audit report is confidential to Primark which enables worker anonymity and auditor testimony.

It is important that the workers in our supply chain can understand the Code of Conduct as it sets out their rights in the workplace. In some countries we have found that imagery can be an effective way to make the different elements of our Code of Conduct clearer for workers. In partnership with local experts, NGOs and designers, we asked workers to design posters that visualise the code to help workers better understand it. These posters are available for factories to display for workers and use in training and are available to download from the Primark website in English, Chinese, Tamil and Bangla. <https://www.primark.com/en/Our-Ethics/Resources/PeopleProduction>

Spotlight on specific issues covered in our Supplier Code of Conduct

Responsible Recruitment

Recruitment practices can present a particular risk to migrant and agency workers. We are reviewing our approach to recruitment practices within the supply chain to identify opportunities to strengthen this. Last year, we held a workshop with external experts to map our current approach, looking at policy, training and awareness, implementation through auditing and monitoring, capacity building and tools. This identified a number of strengths, including our auditing and monitoring programme, and our Fair Hiring, Fair Labour Toolkits.

Primark has been working with experts including Anti-Slavery International and Impactt Ltd to develop detailed guidance and toolkits on ethical recruitment, hiring, agency and migrant labour for our suppliers. Primark is also in the process of developing a dedicated supply chain agency labour employment policy for the UK for publication in 2018.

As with all amendments to our ethical trade policies, the agency labour employment policy will be benchmarked against industry best practice, and we will engage with stakeholders with relevant expertise, including the ILO, trade unions, and civil society.

Spotlight on specific issues covered in our Supplier Code of Conduct

Grievance mechanisms

It is important that people and organisations can raise grievances directly with us and alert us to potential breaches of our Code of Conduct.

They can do this via several channels:

- Directly through the Primark website <https://www.help.primark.com/hc/en-gb>;
- Through our whistle-blowing facility which is available to all our employees, including casual or agency staff http://www.abf.co.uk/documents/pdfs/policies/cr_policies_whistle_blowing.pdf; and
- Through confidential interviews with workers. These are a critical and mandatory part of our audit process. Interviews are always conducted in confidence and in a way that protects the worker and their testimony. During the interviews workers are informed that they can contact the Primark team at their discretion and are given direct contact details.

To strengthen our approach to grievance mechanisms we have reviewed our existing policies and processes to make it even easier for anyone affected to raise grievances and ensure that these are addressed effectively. We are moving forward with this process and have revised our Supplier Code of Conduct to include a new clause on grievance which we will publish in 2018.

We are also focusing on developing solutions that are tailored to meet a specific need or risk in the supply chain and in 2019 we will launch our Grievance Policy supported by a global programme and mechanisms to enable secure reporting.

Living wages

We acknowledge the UN Guiding Principle that processes should complement and not be used to undermine the role of trade unions and collective bargaining processes. Primark is one of the founding members of the Action, Collaboration, Transformation on Living Wages initiative (ACT). ACT aims to formalise the role of trade unions within industry-wide collective bargaining, ensuring that trade unions play a vital role in receiving and addressing grievances both at the operational and industry level. Progress on ACT in key sourcing countries can be found on the ACT website.

www.actonlivingwages.com

Education & awareness raising

Training is a core element to our whole Ethical Trade programme. Without access to the right information, it is difficult for behaviours and actions to change. We continue to prioritise training as a key part of our commitment to preventing and addressing modern slavery.

Employee training

In 2017, we re-launched our employee training programme on ethical trade and sustainability. Since re-launch, 226 members of Primark's commercial team have been trained on the potential risk of modern slavery and made aware of the resources available within the business to help them make informed buying and sourcing decisions.

Supplier and worker training and education

We also launched a new mandatory training programme for suppliers on the risk of forced and trafficked labour. The programme was developed with international experts and based on ILO materials for employers and businesses. During 2017, 95 per cent of suppliers successfully completed the course. In 2018, we will develop and launch further modules which focus on specific issues and indicators of modern slavery.

We believe that if we help workers better understand what they can and should expect from their employer, we can help empower workers and further improve working conditions in factories. That's why we run a number of programmes developed with workers, for workers. For example, in India we've been working on an initiative called 'Drawing the Line' (DTL), a partnership with two Indian NGOs, Women Win and the Naz Foundation.

The programme is designed to find new ways to engage female workers so they feel empowered and confident to define what issues they feel are priorities for them in improving the factory.

The Ethical Trade Team also works with a number of relevant local NGOs to develop our India Worker Empowerment Programme (iWEP) which supports workers understanding and access to their rights and supports management to create best practice in the workplace. SAVE ensures that garment factory workers understand and can articulate their rights by creating Worker Education Groups in the communities where the workers live.

Due Diligence

Identifying the risk of modern slavery

We conduct regular due diligence across the full scope of our business operations to identify risks of modern slavery. Our process was developed in line with the UN Guiding Principles and OECD Due Diligence Guidance, and was the result of in-depth benchmarking and consultation with human rights organisations. To identify risk, our due diligence process consists of four key components: information from credible external reports; Primark audits and information from the local Primark Ethical Trade team; stakeholder consultation; and consultation with rights holders.

— Context assessment

We conduct research using existing external reports and publicly available credible source information to build a context assessment of every country from which we source¹. This includes political, economic, social, and legal analysis and risk mapping, including modern slavery risk, both in the garment and textile sector and other sectors in the country. This helps us to build a detailed picture of potential risk in our sourcing countries and to understand some of the root causes of modern slavery. It also helps us identify key stakeholders and initiatives with whom we may wish to partner or consult.

Most recently, we founded an initiative along with other leading international brands to develop a sector wide approach focusing upon due diligence and responsible sourcing from India, with a particular focus on the lower tiers of the textile supply chain. This group regularly consults with a number of important civil society stakeholders, and in 2018 established an industry platform

on responsible business conduct with Indian manufacturing businesses and the OECD (Responsible Business Conduct Unit), to address due diligence challenges and opportunities in Indian supply chains through shared research and capacity building activities.

— Stakeholder consultation

External stakeholders are a vital source of information and guidance to help us understand the risk of modern slavery in our supply chains, how to identify it, and which groups may be most vulnerable. Their insight and knowledge is invaluable and feeds into our context assessment. External stakeholders also assist in the development of strategies and approaches to prevent or remediate issues. Among others, they include civil society groups, trade unions, governments, international agencies, multi-stakeholder initiatives, and legal experts².

¹ Our evaluation is informed by expert external analysis, and includes risk analysis using publicly available credible sources including: The US Department of Labor's List of Goods Produced by Child Labor or Forced Labor, and The US Department of State's Trafficking in Persons Report; ILO data, reports, observations, and other materials; The Global Slavery Index; The Danish Institute for Human Rights' Country Guides; The Business and Human Rights Resource Centre's records; reporting by international organisations including Human Rights Watch, Oxfam, Friedrich-Ebert-Stiftung, Amnesty International, and the World Bank. These include: ILO, ETI, trade unions, NGOs, and civil society groups and governments.

² This also includes experts in forced and trafficked labour, including IOM, IHRB, Anti-Slavery International, the Freedom Fund, ICN, SOMO, Solidaridad, Stop the Traffik, Responsible Sourcing Network, and many others.

Due Diligence

— Analysis from our own internal data

Primark's local Ethical Trade teams are one of our most important resources, they are our 'eyes and ears' on the ground. Our team of over 110 experts has been recruited from a range of different organisations including other companies, development agencies and NGOs, and includes highly specialised individuals, including a former senior member of the Bangladesh fire service. They are able to build direct relationships with workers in our supply chain and work closely with external partners and stakeholders.

We also scrutinise key trends from our own audit data. Primark has conducted 22,000 audits since 2007 and this information is held on our database which allows us to interrogate the data in detail. It also enables us to check if our audits are identifying all the risks we would expect to find.

— Rights holder consultation and worker empowerment

Workers in the supply chain are rights holders but are often excluded from the due diligence process or face obstacles in getting their voices and views heard. To address this, we launched a tool in 2016 called Drawing the Line (DTL) to help us conduct meaningful engagement with the workers in our supply chain. DTL is a participatory tool designed to obtain direct feedback from workers and can be extremely useful in highlighting the key risks and indicators of forced labour in areas such as recruitment practices, among others.

It was developed by an international NGO in collaboration with a local NGO in India and first implemented by Primark, together with our Indian NGO partner, in selected South India spinning mills as part of our programme to address modern slavery. We have since adapted the tool for Myanmar, with support from a local NGO, and have now implemented the tool in several factories as part of our due diligence there.

DTL engages groups of 10-15 workers in conversation about their understanding of their workplace rights, areas in the workplace where they feel satisfied and provided for, and areas they consider lacking and would like to see improve. The conversation and associated materials are informed by earlier stages of due diligence, including research and engagement with stakeholders, and audit findings. The conversation with workers is facilitated by a series of cards depicting workplace situations and rights and simple accompanying text. Workers select, discuss and rank each card to collectively agree a series of prioritised unmet needs. The process is overseen and managed by an experienced NGO facilitator and the Primark Ethical Trade team who ensures that everyone in the group participates and expresses views. At the end of the process the facilitator helps the group explore how they can work together to address their most important unmet needs.

Tackling and addressing risks

Audit programmes and remediation

Compliance with Primark's Supplier Code of Conduct forms part of our General Terms and Conditions of Business, and we require all our supplier Tier 1 factories to comply with the Primark Code of Conduct as a condition of doing business with us.

In 2017 we carried out 3,420 audits. Primark pays directly for all its audits. This enables us to retain control of the audit protocol, quality and integrity. It also allows us to more effectively address risk through the ability to adapt the audit process as required, for example, the use of unannounced audits or additional indicators to monitor for modern slavery. Suppliers receive the corrective action plan (CAP) but the final full audit report is confidential to Primark which enables worker anonymity and auditor testimony.

All new Tier 1 factories are audited against our Supplier Code of Conduct and must demonstrate that they meet the Code's requirements before they are approved to manufacture Primark products. For new factories, the initial audit is announced, and the date agreed by both parties in order to build trust at the start of the new supplier relationship. This initial meeting also gives Primark the opportunity to explain our Supplier Code of Conduct and ethical trade standards. Once approved, the factory is subject to regular audits, at least once a year, to check the Supplier Code of Conduct is being applied. These subsequent follow-up audits are conducted on an unannounced basis, meaning the supplier does not receive advance warning of when the audit will take place. By conducting unannounced audits, we can ensure we are seeing a more accurate picture of the

factory and workforce. Additional monitoring is carried out by Primark's Ethical Trade team for example, through unannounced 'spot checks' of factories or during discussions with workers in their communities. Confidential worker interviews are mandatory during the audit and form a critical part of the audit process. These are always conducted in confidence and in a way as to protect the workers and their testimonies. During the interviews, workers are informed that they can contact the Primark team at their discretion whenever they wish and are given direct contact details. Any issues that present a severe and imminent threat to workers' lives or safety are prioritised for immediate remediation. Such issues would be assigned a red critical rating under our audit categorisation and the factory immediately suspended on our purchase order system until such time as the issue has been fully and appropriately remediated. In some cases, we partner with NGOs and other organisations for remediation.

All our audits include rigorous checks for forced and trafficked labour. For example, we prohibit the retention of any identity papers, including passports, the use of agency labour that does not meet national standards and any involuntary work. We require the use of transparent employment practices, wages to be paid regularly, on time and directly, including full legal and social security entitlements, freedom of movement, written contracts in employees' own languages with all terms and conditions explained clearly, and the worker's agreement obtained without coercion and suppliers to have policies on employment practices in place.

Tackling and addressing risks

Audit data and findings

Our audits identified a relatively small number of issues relating to forced labour, including the absence of a formal policy on forced labour, retention of documents including identification cards and passports, forced overtime and payment of recruitment fees.

Sub-contracting

Undisclosed sub-contracting, where approved factories send our product orders to unapproved factories for manufacture without consent and approval from Primark, is expressly prohibited and constitutes a breach of our Supplier Code of Conduct and General Terms and Conditions of Business. Workers at unapproved sites engaging in this activity can be more at risk of exploitation, and for this reason we take any such breaches extremely seriously. When undisclosed sub-contracting is identified we suspend the approved factory from our purchase order system.

This means that no further orders can be placed until the supplier is able to demonstrate to us that they can manage and prevent further issues of sub-contracting. This approach has led to several whistle-blowers contacting us with information regarding undisclosed sub-contracting.

Geographic Case Studies

Remediation in Malaysia¹

In April 2018 Primark was made aware of a potential breach of its Code of Conduct in a Malaysian factory relating to the payment of recruitment fees by foreign migrant workers and retention of passports. The factory had produced goods for Primark for eight months, between 2016 and 2017.

Following notification of the breach, Primark thoroughly investigated and worked with Impactt Ltd, with guidance from Anti-Slavery International to remediate existing impacts and prevent any immediate and critical danger to workers, in line with our company's values and international standards of best practice.



Tackling and addressing risks

Geographic Case Studies

Remediation in Malaysia¹

Primark's programme of remediation consisted of three key steps:

- **Addressing** the issues at the factory and working to implement a full programme of remediation and prevention in collaboration with other brands and suppliers sourcing from the same supplier. This included reimbursement of recruitment fees and returning passports to workers.
- **Developing** the opportunities to strengthen our programme and review of our Ethical Trade programme and policies with expert stakeholders to learn from our experience and strengthen our approach in this area.
- **Supporting** wider change across our industry: We are building our understanding of broader issues of migrant employment both in Malaysia and other countries from which we source, and identifying where we can support sectoral level change, in collaboration with other brands and organisations, government and international agencies, including the International Organisation for Migration.

Cotton from Uzbekistan and Turkmenistan²

Suppliers must ensure that they do not knowingly source materials for use in Primark products that are made using forced or trafficked labour. We recognise that modern slavery is equally or more likely to occur in the lower tiers of our supply chain, and that our leverage to address such issues decreases

at these lower tiers due to the indirect nature of the relationship between Primark and these suppliers. Primark banned cotton from Uzbekistan in 2015 due to the risk of forced labour in cotton farming, and extended the ban to Turkmenistan in 2016. We set up a programme to check suppliers are applying the ban and began inspections in 2016 in Bangladesh, extended to India in 2018. Our team on the ground visit spinning mills and check on cotton bale country of origin to ensure there is no cotton from these countries in our supply chain.

Due diligence in China³

Primark's Code of Conduct expressly prohibits the use of any prison labour in the manufacture of its products. Reports by human rights campaigners and media have stated that the practice of forced labour in Chinese prisons and detention centres includes manufacturing for both domestic and export markets. Production allegedly takes place either within prisons, or facilities often owned by prisons which operate as commercial organisations and use prison labour.

Our research and investigations showed that prison labour in China is most likely to feature in the use of unauthorised sub-contracting. We now conduct spot checks that have been specifically designed to verify production is being undertaken in approved sites and all factories where there is evidence of unauthorised sub-contracting are suspended on our purchase order system until the supplier can demonstrate appropriate resource and process to manage production in approved sites.

Tackling and addressing risks

Geographic Case Studies

Due Diligence for North Korean Workers⁴

We know that the North Korean population is a particularly vulnerable group to exploitation and forced labour. North Korea is increasingly sending workers abroad to seek employment in countries, and in industries, around the world. In August 2017, the United States enacted amendments to the North Korea Sanctions and Policy Enhancement Act of 2016. The amendments create a presumption that goods made by North Korean citizens or nationals, anywhere in the world, are made with forced labour.

Primark's Supplier Code of Conduct sets out our requirements to ensure that workers in our supply chain have good working conditions and workplace rights are afforded and respected. This is true for all workers, but we know that we must be even more vigilant when there are known populations of vulnerable workers.

Measuring

We know that measuring progress and impact on issues relating to human rights and modern slavery is difficult. To understand and quantify any actual progress being made, we must understand the story of the worker or affected person. To build a better internal data gathering process, Primark has created a monitoring and evaluation (M&E) framework for our Ethical Trade programmes, to enhance the quality of planning, monitoring and evaluation across our activities.

In developing our M&E framework, we undertook consultations in UK, India and Bangladesh, which included government bodies, the ETI, and other local and international NGOs.

We monitor the coverage and effectiveness of the steps we take to combat forced labour by tracking the following indicators. These are reviewed yearly as part of our Ethical Trade and Sustainability Strategic Objectives:

- The impacts of specific initiatives to address highlighted risks.
- Supplier training and awareness of forced and trafficked labour issues.
- Internal staff training and awareness of forced and trafficked labour issues.
- Actions taken as part of collaborative initiatives to address modern slavery.
- Our audit indicators relating to forced and trafficked labour, and advocacy efforts we have undertaken to draw awareness to or address these risks.
- Supplier non-compliances with our Code of Conduct provisions that employment is freely chosen.
- Registered grievances in our supply chain relating to any form of forced labour.
- Investigative and remedial actions taken in response to any perceived instance of forced labour in our supply chain.

Sign off

This statement encompasses all Primark goods and services and operations, including our retail operations and manufacturing supply chain. It details our policies, our due diligence process, areas of risk we have identified and how we are addressing those risks both directly, and in collaboration with other stakeholders and also outlines our training programmes. Oversight of Primark's ethical trade risks, including modern slavery, is led at Board level by both Primark and its parent company, Associated British Foods plc. (ABF). Accordingly, this statement has been reviewed and approved by both the Board of Primark and Paul Lister, ABF Director of Legal Services and Company Secretary, and signed by Paul Marchant, Chief Executive of Primark.



**Paul Marchant,
Chief Executive,
Primark**

November 6, 2018