

PRIMARK®

Primark Modern Slavery Statement 2023

Introduction	3
Policies	8
Spotlight on gender	11
Due diligence to identify risks	14
Transparency and traceability of our supply chain	17
Supplier selection	21
Due diligence to prevent and mitigate risks	24
Working with partners and stakeholders	29
Decent work	30
Access to grievance mechanisms and remedy	31
Annexes	36
Annex I – Global risks	37
Annex II – Our partnerships	42
Annex III – Key performance indicators	43
Annex IV – Worker-focused programmes and projects	46

Our commitment

We're pleased to share our Modern Slavery Statement which covers our activities for the financial year ending in September 2023.

Modern slavery is one of the most prominent risks within global supply chains. According to [figures released by the United Nations \(UN\)](#) in September 2022, there are an estimated 27.6 million people in forced labour, a significant increase compared to the last figures from 2016. COVID-19, armed conflicts and climate change have exposed vulnerabilities in global supply chains and these challenges have led to unprecedented disruption to employment and education, a rise in poverty, forced and unsafe migration, and an upsurge in gender-based violence.

Our commitment to our customers, stakeholders and the workers who make our products is clear: we prohibit all forms of modern slavery, including child labour, forced labour and human trafficking. We take our responsibility to respect human rights extremely seriously and we're committed to preventing and addressing any modern slavery risks we identify in our operations and in our supply chain. We do this in line with our [Supply Chain Human Rights Policy](#) and our [Supplier Code of Conduct](#) which are aligned to the [United Nations Guiding Principles \(UNGPs\)](#) and Organisation for Economic Co-operation and Development (OECD) [Due Diligence Guidance](#).

In this statement, we outline how our commitment is put into practice through our wider risk and due diligence processes, highlighting the areas of risk we have identified and steps we are taking to address these directly ourselves, with our partners and with industry stakeholders.

All our Modern Slavery Statements can be found on our [website](#) and we welcome feedback on our efforts from our stakeholders, partners and our customers.

This statement was endorsed by the Primark Chief Executive and Executive Committee in January 2024.



Paul Marchant
CEO, Primark
February 2024



About Primark

Primark is an international retailer employing more than 75,000 colleagues¹ across 16 countries in Europe and the US. Founded in Ireland in 1969 under the Penneys brand, Primark aims to provide affordable clothing for everyone, from great quality everyday essentials to stand-out styles across womenswear, menswear and kidswear, as well as beauty, homeware and accessories. While we don't own the factories that produce our products, we know we have a responsibility to ensure the people who make our products can access decent work, in safe workspaces which are free from modern slavery.

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 Statement](#).



422
suppliers²



631,036
workers in tier
one supply chain²



851²
factories³



327,236
female workers



22
sourcing countries



2,360
ethical trade
supply chain
audits conducted
in 2022⁴

¹ Data as per ABF's financial year end of 16 September 2023.

² Figures based on our [Global Sourcing Map](#), updated in November 2023.

³ Tier one factories manufacturing finished goods in our supply chain.

⁴ Data runs to 31st December 2022. This number has been publicly assured by KPMG

Governance and accountability

We have an established governance and accountability framework for the implementation of our programmes to address modern slavery risks within Primark and its supply chain.

- Responsibility and accountability for risk management, including modern slavery due diligence, sits with our Chief Executive and Executive Committee. As a subsidiary of Associated British Foods (ABF), the ABF Board also provides general oversight and guidance.
- Our Chief Executive and Executive Committee oversee the strategy around modern slavery due diligence which is specific to Primark and our supply chain, and provide periodic updates to the ABF Board about this process. The Primark Ethical Trade and Environmental Sustainability Operations Director is responsible for operational implementation of Primark's policy relating to modern slavery due diligence in the product supply chain. Potential and actual risks of modern slavery within the product supply chain are managed by the Primark Ethical Trade and Environmental Sustainability Operations Director, the Group Product Director, the Primark Cares Director and other Directors in other relevant departments as needed, including Legal and Risk and Compliance. They are reported to the Primark Executive Committee, the ABF Director of Legal Services and Company Secretary, and the ABF Group Corporate Responsibility Director.
- Primark's Ethical Trade and Environmental Sustainability (ETES) team, is made up of over 130 team members who work across Primark globally and conduct due diligence on human rights issues and risks relating to the supply chain of products sold or used by Primark.
- If a risk or issue is complex or ongoing, a Steering Committee may be set up to manage and address the situation. This has been the approach, for example, in 2022 in relation to the risk of human rights violations in both Xinjiang and Myanmar. The relevant Steering Committee will include different specialisms from across the business such as members of the ETES team, Legal, Commercial, Sourcing, Internal Audit and Corporate Affairs.

 **130**

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

Communicating our progress

Communicating our progress is important to us and our stakeholders and can support our industry to help address modern slavery. We aim to be transparent in our efforts and to share our learnings.

- We publish an annual Modern Slavery Act statement which can be found on our [website](#).
- We publish further details on our efforts on our [website](#), within our annual [Primark Sustainability and Ethics Progress Report](#) and within the [ABF Responsibility Report](#).
- As members of the [Ethical Trading Initiative \(ETI\)](#) and the [German Partnership for Sustainable Textiles](#), we are assessed regularly on our due diligence.
- NGO KnowTheChain benchmarks our performance in addressing the risk of modern slavery, their feedback can be [read here](#).
- We provide regular updates directly to our shareholders and stakeholders.

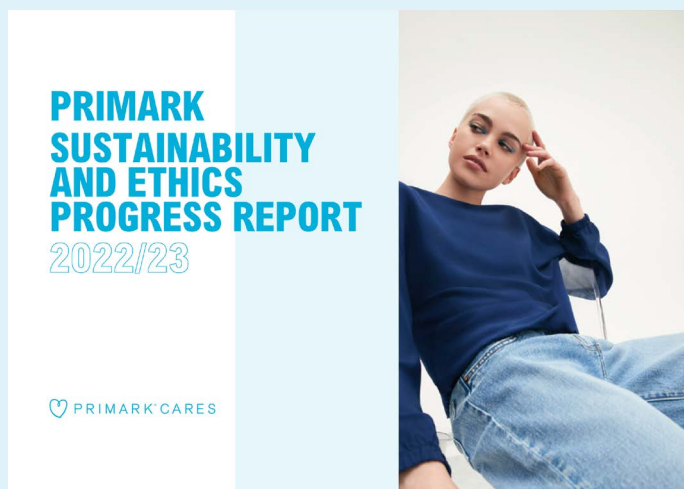


Primark Cares

Our work focusing on improving labour standards in our supply chain has been implemented through our Ethical Trade programme for over 15 years. Our [Primark Cares](#) strategy, launched in 2021, aims to build on these foundations and accelerate our commitment towards becoming a more circular and more sustainable business. Primark Cares is our commitment to doing better as a business. This means changing how we design and make our clothes, to the materials we use, how we work with our suppliers, and how our products are packaged and shipped.

Our Primark Cares strategy consists of commitments stretching until 2030 that are underpinned by four key elements:

- Our commitment to ethics and human rights through our [Supplier Code of Conduct](#) and [Supply Chain Human Rights Policy](#);
- Our [Environmental Policy](#), which sits within our Supplier Code of Conduct;
- How we collaborate and engage with our suppliers, stakeholders and partners; and
- Traceability and transparency.



There are three pillars to the strategy – Product, Planet and People – each of which has a clear ambition and supporting targets.

The People pillar is the most directly relevant to our work to address modern slavery risks in our supply chain with a commitment to protect and improve the livelihoods and resilience of the people who make our clothes with a focus on programmes and initiatives that will help:

1

Create financial resilience – we will pursue a living wage for workers in our supply chain and support with financial literacy training and access to social protection by 2030.

2

Promote equal opportunities for women – we will strengthen the position of women through skills development and addressing their barriers to progression by 2030.

3

Improve overall health and wellbeing – we will ensure access to effective grievance processes and widen access to help for mental and physical wellbeing by 2030.

We have a comprehensive governance framework in place to oversee the development and delivery of our Primark Cares strategy.

More information on Primark Cares and our work to embed the strategy within our business and supply chain can be found in our [Primark Sustainability and Ethics Progress Report 22/23](#).

Our policies and approach

We have policies and procedures in place that set out the standards we require from our suppliers and employees, and mechanisms that give individuals the ability to raise issues and concerns around modern slavery.

Primark's policies are reviewed and updated as needed to ensure we maintain rigour and that they align with international standards. The Primark Chief Executive and Executive Committee have accountability for the approval of policies. Our key policies are described in the next paragraphs.



Our Supplier Code of Conduct

Our [Supplier Code of Conduct](#) is based on the UN's [International Labour Organization's \(ILO\) Core Conventions and Fundamental Principles](#), including the elimination of forced labour. 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 compliance with the Supplier Code of Conduct in their whole supply chain and Primark has audit rights with unrestricted access. Our Supplier Code of Conduct is updated regularly, following internal review, and with input from external stakeholders.

The Supplier Code of Conduct is provided to suppliers and available online. Compliance with the Supplier Code of Conduct is a contractual commitment that we require of all our suppliers. It was last updated in 2023.

We require that all 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 44 languages on our [website](#).

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

Employment is freely chosen:

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

Our Supply Chain Human Rights Policy

Our [Supply Chain Human Rights Policy](#) was published in 2022. It was developed through stakeholder engagement and consultation and is sponsored and signed off by our Chief Executive.

The policy sets out:

- Our commitments and contribution to the UN Sustainable Development Agenda, and in particular Sustainable Development Goal 8 on Decent Work: 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 in place throughout our supply chain.
- How we enact the UN Guiding Principles for Business and Human Rights (UNGPs) and the OECD Due Diligence Guidance on Responsible Business Conduct and supply chain due diligence.

Anti-Bribery and Corruption Policy

As part of the ABF group of companies, we have 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 and local laws. The policy is also incorporated into our Supplier Code of Conduct and prohibits any bribes, including facilitation payments.

Primark Head Office employees based in the UK and Republic of Ireland must complete online training on anti-bribery and corruption when they join the company and at regular intervals during their employment. The ABF Legal team deliver face-to-face and virtual training with our teams located in our sourcing countries, which allows for direct discussion and enables a forum where specific questions or concerns can be raised and addressed. We also require relevant third-party service providers and partners – regardless of size, location or type of service provided – to undergo our training programme where our assessment indicates there is a need. Primark's suppliers are required to put in place 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 here at Primark. It is really important to us that our colleagues feel empowered to tell us if they are aware of anything they believe to be inappropriate, improper, dishonest, illegal or dangerous, and that we maintain open and honest communication throughout all levels of the business.

Our Speak Up policy sets out that we will not tolerate the victimisation of anyone raising a genuine concern and we will ensure that person is supported and protected from adverse repercussions, retaliation or detriment. Concerns can be reported verbally or in writing and we have established dedicated phonelines and email addresses to support our Speak Up policy, in addition to dedicated Speak Up officers both within Primark and ABF. More information can be found on our [website here](#).

We encourage all colleagues working for Primark in any of our businesses in any country and in any capacity to Speak Up, including colleagues at all levels, directors, officers, part-time and fixed-term workers, casual and agency workers, seconded workers and volunteers. Where appropriate, we also encourage third parties who are associated with Primark to Speak Up, including shareholders, suppliers, agents, contractors, external consultants, third-party representatives, business partners and sponsors.

We hope that our colleagues feel able to Speak Up internally; we advise our managers on how to deal with these issues discreetly and appropriately; otherwise we have a confidential and anonymous (where allowed) mechanism for Speaking Up (Speak Up System).

Further information on our approach to grievance mechanisms in our supply chain can be found on [page 30](#).

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 where all companies are taking the right steps.

In the year under review, there have been significant developments in legislation within the EU on responsible business conduct due diligence and regulation focusing on forced labour. This includes the German Supply Chain Due Diligence Act, the French Corporate Duty of Vigilance Law, the proposed EU regulation prohibiting products made with forced labour, and the EU Directive on Corporate Sustainability Reporting (CSRD).

We engage with policymakers to share our experiences and learnings where this can 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, and the Foreign Commonwealth and Development Office and the Office of the Prime Minister's Office;
- Engaged with Anti-Slavery International (ASI) around forced labour issues in Xinjiang Uyghur Autonomous Region of China (XUAR), Uzbekistan and Turkmenistan. Cotton from these countries is prohibited from Primark supply chains; and
- Engaged in discussions on Corporate Sustainability Due Diligence Directive (CSDDD) and Corporate Sustainability Reporting Directive (CSRD) and the EU proposal for a regulation on prohibiting products made with forced labour through industry groups including EuroCommerce and Policy Hub.

Addressing issues around gender in our supply chain

Gender-based violence and harassment (GBVH) is one of the most severe risks facing women in global supply chains. Physical and sexual violence is one of the [International Labour Organization \(ILO\)](#) indicators of forced labour. Issues can often be undetected or unreported and many workplaces do not have the skills and capacity to deal with cases when they do arise.

We understand that addressing and preventing risks to women requires a systems-led approach, and we continue to build and strengthen our approach to tackle this complex and serious issue through engagement with experts and key stakeholders. In 2022, we developed a draft remediation toolkit for GBVH in partnership with [Business Fights Poverty \(BFP\)](#) aimed to guide our in-country teams. Moving forward, we will continue to develop and adapt this to the specific context of Primark's supply chain.

We have prioritised working towards the application of Gender Responsive Due Diligence (GRDD) across GBVH risks. This is based on our understanding that women are often disproportionately affected by adverse business practices, which warrants a due diligence process that responds to their specific needs. GRDD is based on the recognition that human rights violations are not gender neutral and should not be treated as such.⁵



⁵ <https://www.genderduediligence.org/about/>

Cambodia STOP

In 2023, we completed the STOP programme with [NGO Care International \(Care\)](#), engaging five factories over 18 months from December 2021 to May 2023. The project aimed to promote harassment-free workplaces in Primark's supply chain and influence industry change. It included a model of workplace policies for preventing sexual harassment including implementation guidance, training for factory workers, awareness raising, strengthening women's voices in reporting sexual harassment, and ensuring the use of response mechanisms. Care identified and reported the following key outcomes from the programme.⁶

1

All five participating factories introduced workplace mechanisms to prevent and respond to sexual harassment. They all appointed a Sexual Harassment Prevention Committee (SHPC) responsible for implementing sexual harassment policy in the factory. They now meet every three months to share and discuss the challenges and support needed from their teams as well as from the project team.

The structure of SHPCs and their contact details are shared on posters as well in the audio record broadcasting during working hours in each factory.



2,184

women workers
trained



5

factories

2

Garment factory workers reported feeling safe to report sexual harassment free from negative consequences. In total, 86% of all factory workers (2,810 workers; 2,184 women workers) received training on sexual harassment prevention. 1,089 workers (832 women) across the five factories actively participated in awareness raising activities, such as May Day events, 16 Days of Activism against Gender-based Violence campaigns and International Women's Day events in their factory. Most of the workers improved their understanding of sexual harassment-related behaviours and their impacts. During focus group discussion, workers reported confidence to report cases.

A sample of 26 female workers from the five factories could provide at least two forms of sexual harassment behaviours from a position of none at the beginning of the project.

3

The initiative led to increased engagement of key stakeholders and their focus on improving conditions for women working in the garment industry. Key government stakeholders, including the Ministry of Labour and Vocational Training (MoLVT), Ministry of Women's Affairs (MoWA), Ministry of Interior (MoI) and Ministry of Justice (MoJ), were engaged in two key events facilitated by the project, including high-level dialogue on preventing GBVH in April 2023 and the dissemination and closing workshop in May 2023. Other key stakeholders included in the events were international brands, civil society, trade unions, and Better Factories Cambodia (BFC). Participants shared their experiences and committed to continuing the journey of eliminating GBVH and harassment in the world of work and to supporting the process of ratifying ILO Violence and Harassment Convention, 2019 (No. 190).⁷

We are now working to take learnings from this programme to inform the next phase of work on this issue in Cambodia.



86%

of all factory workers trained

⁶ Primark-CARE Cambodia Programme Phase 2 (Dec 2021-May 2023) STOP: Creating safe and respectful workplaces in the garment industry

⁷ https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C190

Raising awareness of GBVH in Vietnam

Over the last year, we've also continued to support our three-year partnership with the [International Finance Cooperation \(IFC\)](#) to prevent and address GBVH through engagement with four suppliers in Vietnam. As a first step, the IFC undertook an assessment of the factories and found they lacked policies and processes in this area but also highlighted the prevalence of certain attitudes as a key driver of GBVH, for example, that victim blaming is particularly common. This speaks to the importance of supporting attitude and behaviour change as part of the solution to drive a zero tolerance to workplace GBVH.

This form of support is the foundation of our [Drama for Change](#) programme which runs in parallel to our IFC programme and uses live participatory theatre performances to engage workers and management on attitudes towards GBVH. Since completion of the assessment, we've launched training in 13 factories and their four suppliers. This is supported by the provision of individual coaching based on the specific needs of the factory or supplier. Once this training is completed early next year, IFC will report on the impact of their support and recommend a methodology and tools to scale up the programme in other regions.



We conduct due diligence to identify the potential and actual risks of modern slavery in our own operations and our supply chain. This process is continuous, dynamic, and is informed by and responsive to multiple interdependencies. This includes, for example:

- information from stakeholders
- our own internal research
- findings from our country teams
- analysis from our monitoring; and
- dialogue with workers and their representatives.

Using multiple different sources of information allows us to collate information and gain a more holistic understanding of risks.

We have prioritised identifying the risks in our tier one supply chain, where we have more visibility and knowledge of risks.⁸ We are now extending our due diligence into the lower tiers of our supply chain, including into raw materials, where we have prioritised the cotton supply chain.

As part of our due diligence, we consider the root causes driving these risks, and whether risks are isolated and unique to a workplace or are widespread within a country or population. The presence of widespread risks can indicate a more systemic and endemic issue which requires a different approach than would be appropriate if we were to address a risk present in a particular workplace. The outcome of our risk mapping informs our due diligence programme, which enables us to prioritise our efforts and help prevent and mitigate risks in an appropriate manner.



41,198

audits, investigations and spot checks conducted on Primark's supplier factories since 2007

Our due diligence risk identification process

We identify the risks of modern slavery using a wide range of credible and robust sources. [See Annex I – Global risks.](#)

Our global ETES team and audit programme

Primark's global ETES team is one of our most important resources in identifying risks. We have more than 130 team members working across 12 key sourcing countries. They play a significant role in monitoring conditions in our factories, engaging directly with workers in our supply chain and our external partners and experts on the ground to understand the risks and root causes of such risks. They have been recruited from a range of different organisations including other companies, development agencies and civil society. This on-the-ground engagement adds an additional layer of insight and visibility into working conditions and human rights risks within our supply chain.

We carry the full cost of these audits which includes rigorous checks for health and safety management, in addition to human rights and labour rights issues.

We conduct social audits, most of them unannounced, on tier one factories at least once a year. Our social audit programme is currently being expanded to cover more of Primark's suppliers such as service providers and logistics. In situations where we perceive there to be a high risk of forced labour, we increase the frequency of our audit programme and enhance it with specific training to identify relevant indicators. This provides us with information on risks at a site level. We are able to draw from intelligence and analysis of over 41,198 audit, investigation and spot check reports conducted on Primark's supplier factories since 2007, which allows us to conduct trend analysis.⁹

⁸ Tier one factories manufacturing finished goods

⁹ Data as per August 2023. 41,198 audits, investigations and spot checks carried out since 2007.

Engagement and consultation with stakeholders

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 are invaluable. Stakeholders include civil society groups such as [Anti-Slavery International](#), trade unions such as [IndustriALL](#), governments, international agencies such as the ILO, intergovernmental agencies, multi-stakeholder initiatives (MSIs) such as the [Ethical Trading Initiative \(ETI\)](#), and legal experts.

Engagement and consultation with rights holders

As rights holders, workers globally across all sectors and industries can often be excluded from the due diligence process or face challenges in getting their voices and views heard. We have developed specific tools and methods to support rights holder consultation within our due diligence.

'Drawing the Line' is a tool that has been used by our teams in India and Myanmar in partnership with, and through support, of local NGO experts. It involves a participatory method designed to obtain feedback directly from workers on how they feel about their work and life at the factory, to engage discussions with workers on any unmet needs in the workplace, and to educate workers on how they can approach securing those needs. It helps Primark to understand the violations and risks facing workers, alongside their broader unmet needs in the workplace. These findings help to inform programming and prevention and mitigation within the factories, based on the gaps and impacts. This ensures interventions are appropriate and tailored to the needs of workers.



Country-based due diligence risk research

Due diligence is conducted on new countries or regions proposed for Primark production and includes a deep-dive, desk-based assessment using external reports and sources of credible information, ahead of market entry and on an ongoing basis.

The assessment includes political, economic, social and legal analysis, and risk-mapping including modern slavery risks. Assessments consider both the garment and footwear sector and additional relevant sectors and industries. This helps us to:

- build a comprehensive picture of the risks in the country, including those that fall into the classification of modern slavery using indicators of forced labour;
- understand the deeper root causes of these risks with a view to their prevention or mitigation ahead of entering a new country or region; and
- identify key stakeholders and initiatives working on these issues that we can engage with and learn from

Heightened due diligence assessments for high-risk areas

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.

Myanmar

In September 2022, following the publication of the [Ethical Trading Initiative \(ETI\)](#) independent assessment on responsible business conduct within Myanmar, we took the difficult decision to create a framework to guide our responsible exit from the country.¹⁰ The

ETI's independent findings confirmed we could no longer conduct the necessary due diligence we insist on to uphold the standards in our Supplier Code of Conduct and protect the safety and rights of the people who make our products.

Following the ETI report we worked closely in global trade union IndustriALL and other major brands with inputs from the OECD to develop a framework for responsible business disengagement from Myanmar. This new framework follows the guidelines of the OECD while considering the specific context of Myanmar and aligns with our approach to responsible exits under the terms of membership of ACT. The framework has guided our responsible exit from Myanmar which is conducted with frequent consultation with IndustriALL and other relevant stakeholders. We stopped placing new orders in October 2022 and our final orders were shipped in October 2023.

During the past 12 months, we continued to work closely with factories, suppliers, trade unions, labour organisations and project partners to seek remedy for issues that arose, and where possible, build capacity for the factories' management and mitigate the impact to the workers in our suppliers' factories.

¹⁰ <https://www.ethicaltrade.org/resources/myanmar-enhanced-due-diligence-sectoral-assessment>

We're focused on improving transparency across our end-to-end product beyond our tier one supply chain. This will enable us to further understand what potential risks are present throughout the supply chain, allowing us to prioritise our approach. The size and complexity of our product supply chain makes traceability a challenge but it's something we continue to focus on. This year, we established a Transparency and Traceability team, now seven strong, within the Sourcing team, to help us further embed this with our business and supply chain. This team is based centrally in our Head Office and in our sourcing markets.

Tier one – finished goods

For the past six years, we've published our [Global Sourcing Map](#) showing all Primark-approved tier one factories, representing approximately 94% of Primark products for sale in our stores.¹¹ Production sites are included once they have worked with us for over one year. We include the factory name and address, the number of workers and the gender split. Information from the Global Sourcing Map is accessible as a PDF to download. The map is updated annually and is also added to the [Open Supply Hub](#).



¹¹ Figures based on our [Global Sourcing Map](#), updated in November 2023.

Upstream - suppliers of fabrics and yarns

Over the last two years, we've been building a partnership with a market-leading platform for supply chain traceability, [TrusTrace](#). Its traceability software and online platform allows us to gather data from the supply chain of a product, from raw materials through to finished product. We started with the supply chains of products containing cotton, as it is our most used fibre, with a pilot involving suppliers that account for around a third of the cotton used in our products. We have since expanded the programme to include more suppliers, fibres and products. Our Transparency and Traceability team lead this programme.

We continue to train suppliers on a regular basis around our traceability expectations. Last year, we ran training for all tier one suppliers on how legislation and supply chain due diligence are driving traceability requirements, and the challenges we'll need to work through together to ensure compliance. This year, we also ran face-to-face training with 48 suppliers in China highlighting the importance of traceability, why it matters and what is required from a Primark-supplier perspective.

Upstream - suppliers of raw materials

We work closely with our suppliers to achieve segregation and traceability of the cotton from our [Primark Sustainable Cotton Programme \(PSCP\)](#), now 10 years old. The programme is helping to support our commitment that 100% of the cotton in our clothes will be organic, recycled or sourced from our PSCP by 2027.

We use [CottonConnect's](#) system called TraceBale to track the cotton from PSCP farming communities to ginners and spinners. Given the complexity of the cotton supply chain, we wanted to go further in terms of verification, and we were one of the first high street retailers to partner with [Oritain](#), a specialist scientific verification firm.

While [TraceBale](#) gives us visibility over the journey of the cotton from the PSCP farming communities to ginners and spinners in our supply chain, Oritain uses forensic science techniques to confirm the origin of our PSCP cotton. We combine the data from Oritain with the TraceBale database to help verify the traceability of the cotton from our PSCP.



The Primark Sustainable Cotton Programme

We launched our Primark Sustainable Cotton Programme (PSCP) as a pilot with 1251 farmers in India in 2013. Working in collaboration with agronomic experts [CottonConnect](#) and the [Self-Employed Women's Association \(SEWA\)](#), our objective was to understand and reduce the environmental impact of our cotton, support the livelihoods of cotton farmers and explore how we could change the way we sourced cotton.

We have since expanded our PSCP to other countries and also work with local partners Myrada in India, the Rural Education and Economic Development Society (REEDS) in Pakistan and Thengamara Mohila Sabuj Sangha (TMSS) in Bangladesh. This year we extended the programme to Turkey through an initial pilot.

As of July 2023, 299,388 farmers have received training in more sustainable farming methods, surpassing our target of 275,000 farmers by the end of 2023.

About the programme

Cotton farmers are trained to reduce their use of water and dependence on chemical fertilisers and pesticides, in addition to learning new skills relating to seed selection, land preparation, sowing, crop management and harvesting. The training is aligning to CottonConnect's REEL Code of Conduct.¹² The farmers have re-invested their improved cotton incomes into their farms and homes, and in the education of their children.¹³

Around 90% of the farmers in our PSCP are smallholders and 80% of the farmers in the programme are women. Building resilience among farming communities is at the centre of our PSCP. Since 2019, almost 12,000 women in Pakistan and Bangladesh have received training to improve their financial literacy, and access to healthcare, including family planning and menstrual hygiene. Participants are also educated about women's rights.¹⁴

Addressing risks within the cotton supply chain

Third party audits are conducted by FLOCERT against the REEL Code of Conduct. These audits are carried out in the second year of training at farm level based on standardised sampling methodology. FLOCERT audits generate recommendations through corrective action plans for CottonConnect and their implementing partners' follow up.



299,388
farmers trained



80%
are women



¹² Based on CottonConnect's REEL Code: www.cottonconnect.org/sustainable-practices

¹³ Based on research from 2023 involving 70 farmers involved in the programme since 2013.

¹⁴ Impactt: <https://impacttlimited.com/>

Human Rights Due Diligence in the Primark Sustainable Cotton Programme

We are enhancing our approach to Human Rights Due Diligence to strengthen progress against the social elements of the REEL Code of Conduct specifically at farmer level, in collaboration with Impactt and CottonConnect.

Whilst the PSCP does have an existing approach, designed and governed by our partner, CottonConnect, we identified a need to intensify our engagement on this issue and ensure we have an approach to human rights due diligence at the farmer level that both meets international best practice and is appropriate to the local context. To deliver this, we have started working with international consultancy Impactt, who have over 25 years' experience of delivering diagnostic and improvement work to uncover root causes of issues affecting supply chains.

The work with [Impactt](#) has focused on building a human rights due diligence framework for our PSCP that is based on the OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sectors. The first part of this work has been working at a strategic level collaboratively with CottonConnect to build a gap analysis as well as understanding the roles and responsibilities of the different actors in the cotton supply chain. Impactt has also developed a monitoring framework which is based on our Supplier Code of Conduct. This includes building out a methodology of what a field level assessment could look like, how our partners define severity of risks, and potential response pathways.



Selecting suppliers that meet and share our standards

Our global supply chain is large and diverse and our tier one supply chain spans 22 countries. We have implemented a number of measures for supplier selection and ongoing due diligence and we regularly monitor and update this process.

- Our suppliers are responsible for compliance with and implementation of our Supplier Code of Conduct across their supply chain, factories and contractors.
- Suppliers must not source components or materials for use in Primark products that are made using child labour, forced labour or human trafficking.
- We audit and approve all tier one factories before any orders are placed. Not all factories will pass this audit for approval, meaning we cannot work with them. Once a factory is approved, we then audit them on a regular basis (at least annually).
- Our policy is that all audits are unannounced, apart from the initial audit used to gain approval for Primark production.¹⁵ For these sites, production is only permitted once the ETES team is satisfied that Primark's standards, as set out in our Supplier Code of Conduct, are met.

- All audits include checks for forced and trafficked labour including a review of relevant documentation, confidential worker interviews, visits to associated production facilities, and worker accommodation if provided by the factory. We refer to the ILO indicators of forced labour for guidance within our ongoing risk analysis activities.
- We may also conduct worker interviews off-site, if necessary, and may use support from NGOs or other experts to carry these out.
- We follow Sedex Members Ethical Trade Audit (SMETA) best practice guidance on the sample number of workers interviewed.¹⁶



¹⁵ All Primark audits are unannounced. Audit conducted by ILO Better Work are semi-announced which means a supplier is given a window of time when the audit will be conducted.

¹⁶ <https://www.sedex.com/wp-content/uploads/2019/05/SMETA-6.1-Best-Practice-Guidance.pdf>

- Our own auditors are trained to SA8000 standards and conduct many of our audits, with the balance of our audits conducted by carefully selected third-party auditors.
- After an audit factory is issued with a corrective action plan (CAP) which outlines the areas for improvement. Each item in the CAP is timebound and the CAP contains practical guidance to help factory management implement the recommended action.
- We verify implementation of the CAP through ongoing monitoring, including follow-up audits, spot checks, document reviews and worker interviews.
- Should audits or third-party allegations highlight a severe risk of forced labour, we work with experts to conduct deeper dive assessments. These assessments employ worker-centric and forensic auditing techniques and provide sensitive and tailored remediation and ongoing support for workers.
- If at any point we identify any issues that present a severe and imminent threat to workers' lives or safety, we prioritise these risks for remediation, and the factory is immediately suspended from our purchase order system until we can verify that the issue has been fully addressed.
- Primark is a partner member of the ILO Better Work programme, a collaboration between the ILO and the IFC. Primark factories enrolled in Better Work go through a process that includes assessments, advisory services, industry seminars and training. Conditions and improvements in each factory are assessed by Better Work's enterprise advisors based on the Better Work Compliance Assessment Tool. Assessment results are accessed by Primark in Bangladesh, Cambodia, Pakistan and Vietnam where this tool is implemented.
- Situations where suppliers are either unable to make improvements, or lack commitment to do so, may lead to termination of our relationship.¹⁷

¹⁷ There may be situations where an inability to conduct due diligence requires us to withdraw from a region, sector or country. In these situations, we will be guided by international frameworks and consultation with all relevant stakeholders.

- We view termination as a last resort and it is an action that is rarely used. In cases involving individual suppliers or factories, our Buying and Sourcing teams work on a responsibly managed exit plan in line with the [Action Collaboration Transformation \(ACT\) Responsible Exit Policy and Checklist](#), which we have used as a business since 2019/2020.¹⁸ As part of our continuous improvement to this commitment, we conducted a review of the process in 2022 and strengthened our internal due diligence to ensure further compliance. Any exit of a supplier's factory includes a review of the factory's dependency on Primark and any possible impact on their workers as a result of our exit. We still continue to honour existing orders the factory already has with us before the decision to terminate the relationship.



¹⁸ [ACT_Fact-Sheets_ACT-Responsible-Exit-Policy_FA.pdf \(actonlivingwages.com\)](#)

Unauthorised subcontracting

Unauthorised subcontracting is not permitted and is a breach of our Terms and Conditions. We recognise that workers in unauthorised factories could be at heightened risk of forced labour.

We will conduct an immediate, unannounced assessment of any factory or production site where unauthorised subcontracting is suspected. The assessment focuses on whether unauthorised subcontracting has or is taking place and whether there are any severe issues, including forced and child labour, at the unauthorised factory.

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 the measures to manage and prevent any further issues of unauthorised subcontracting.

In cases where both unauthorised subcontracting and a further severe ethical breach are uncovered, the supplier and all production sites attached to the supplier may also be suspended. Suspension will remain in place until all remediation has been completed by the supplier. Failure to complete remediation and/or persistent unauthorised subcontracting may result in termination and deactivation of the supplier and/or sites from Primark.

We have recently reshared our policy on unauthorised subcontracting with every supplier we work with to ensure they have the most up to date information and Primark position on this.



Our approach to the prevention and mitigation of risks

Our due diligence to address the risks of modern slavery in our supply chain is tailored to the context and nature of the specific risks, the underlying root causes, the infrastructure, and resources available. It is informed by precedent and best practice, and the expertise of our local team on the ground, as to the most valid and appropriate method.

We use a range of appropriate measures, including corrective action plans resulting from audits and assessments, often in partnership with expert organisations and stakeholders.

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. We know that partnering with local experts is important if we are to develop effective programmes built around the needs of the workers that deliver the impact that works for them. Many of our partners are grassroots civil society and development organisations and these partnerships have been built and fostered over the past decade and span all our key sourcing markets.

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

Within this statement, we have:

- Reported on the key potential and actual risks we have identified within our industry, and the steps we are taking to address these risks, both directly ourselves and with other partners and stakeholders across the industry [[See Annex I – Global risks](#)];
- Included case studies on selected programmes and initiatives that seek to address modern slavery, decent work, and human rights in the supply chain [throughout]; and
- Reported on the partners and stakeholders we work and consult with as part of due diligence. [[See Annex II – Our partnerships.](#)]



Training and awareness-raising programmes

Training and awareness-raising programmes are both 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 employees in key roles through dedicated training seminars designed to promote awareness and mitigate and prevent risks. Highlights from the year under review include:

- Developing a training module to improve awareness of responsible purchasing practice commitments in collaboration with the [ACT](#) using the Primark Digital Learning Platform. 730 colleagues from the Product and Sourcing teams completed the initial awareness training in 2022 and in 2023 we extended this training to more teams.

- Providing human rights due diligence training and awareness raising sessions for 124 members of the ETES team, with additional sessions rolled out to other relevant departments and several key external service providers.¹⁹

- Delivering over 5,725 hours of training across the supply chain to more than 50,000 participants. Participants included factory managers and supervisors, workers, and Primark teams in our key sourcing countries. Training covered a range of topics from grievance mechanisms and gender-based violence and harassment, to worker skills development and gender equity, with support from external experts on these issues where required and as appropriate. 1,402 hours were delivered by internal colleagues and over 4,323 hours were delivered by external experts and partners.



¹⁹ Data correct as of September 2023.

Spotlight on responsible recruitment

Recruitment and hiring practices are one of the most common ways in which workers in all sectors can be exploited and 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 as part of our due diligence:

- We support the Employer Pays Principle (EPP), which means that no worker in our supply chain should pay for their job, and that any costs associated with their recruitment must be paid for by the employer. This is stated in our Supplier Code of Conduct.
- Our suppliers are permitted to use agency and contract workers provided they are afforded the full rights as set out in the Supplier Code of Conduct. We provide training to suppliers to ensure they are aware of the risks and our requirements.
- We may conduct additional due diligence on suppliers that hire migrant and contract or agency workers. Migrant, contract and agency workers can be more vulnerable to recruitment practices that may result in forced, indentured and bonded labour.
- If recruitment fees are identified as having been paid by workers, suppliers are expected to provide remedy in the form of reimbursement of fees to workers.

Agency and labour providers in Western Europe and the UK

Workers hired through agency and labour providers can be particularly at risk of forced labour. In 2019, we began a programme of enhanced due diligence on agency and labour providers in specific parts of the supply chain where we identified workers most at risk, which included production, logistics providers, warehouses and recyclers in key countries in Western Europe, including the UK.

From the beginning of 2022, we have expanded our due diligence approach to look at security providers and cleaning services that are provided via agency labour within our supply chain. We have expanded this work into the US, Morocco and Tunisia, in both our goods for resale and goods not for resale supply chains.

Our first objective has been to identify and prioritise those workers most at risk of forced labour. Our due diligence looked at the current context in each country (e.g; the prevalence of agency regulations, temporary labour usage trends, proportionality of known migrant worker routes) and enabled us to develop a risk-based prioritisation in consultation with local partners. Following this, we adapted our audit programme in order to identify risks based on the current context in each country.

My Journey, India

Factory middle management plays a critical role in identifying, preventing and mitigating forced labour risks in factories within the supply chain. Primark identified that middle management was often inadequately informed of forced labour risks and prevention measures. Where training was available to middle management, it was often not sufficiently practical and targeted enough for them to implement changes to their workplace policies and programmes that would address modern slavery.

This was particularly the case for recruitment and hiring processes, where there are indicators of forced labour.

As a response to this risk, My Journey was developed and launched by Primark's team in India in 2019. The programme 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 prevent and mitigate them. For example, making sure that all new recruits have contracts that they understand and have not paid recruitment fees to secure their job.

The programme is underpinned by three Golden Rules:

1. No recruitment fees
2. Accurate information provided to candidates
3. Free will of applicants and new recruits

The objectives of My Journey are for:

- Recruiters to understand the significance of the three Golden Rules;
- Factory management to understand and respect the role of their Human Resources departments in streamlining the recruitment and hiring process through coordination among different departments; and
- Factory management to effectively forecast human resource requirements through robust manpower planning.

Participants receive training on the ILO's forced labour indicators, key steps in the recruitment and hiring process (plan, search, select and hire), the risks of forced labour associated with each step, and documenting policy and procedures.

Prior to the delivery of training, Primark's team visits each factory to undertake a due diligence assessment of its current recruitment and hiring processes. Gaps are identified and discussed with management, and then used to measure subsequent progress throughout the programme. Some of the more common issues identified include:

- A lack of knowledge of the risks of modern slavery, and the legislation covering modern slavery
- No written policy, processes or procedures on recruitment and hiring; and
- No internal department coordination on manpower planning, often to the exclusion of the Human Resources department.

The due diligence assessments have also revealed isolated but concerning issues such as third-party recruitment agents charging new recruits for a job in the factory, and factories deducting pay from existing workers who recommended new workers who then left the factory before a certain period.



The impact of My Journey

To date, 27 factories in India have received training and support under the programme since 2019. A survey conducted by the Primark India team across 13 of the participating factories in 2022-2023 found that:

- 85% of the participating factories had developed new recruitment policies and procedures as a result of the programme;
- 15% of the participating factories had modified their existing processes as a result of the programme; and
- 80% of the participating factories had confirmed they had improved interdepartmental and managerial interaction following the training and improving shift planning and coordination among factory departments.

Factories have taken steps to improve their manpower planning and linked this to recruitment plans, reducing the risks created when recruitment is conducted in haste.

Looking ahead, the team plans to expand the programme to reach more factories, and to strengthen the ongoing monitoring of processes and outcomes at participating factories as part of its due diligence. Over time, it is essential that more factories take responsibility and ownership for embedding the programme learning into their management systems.

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85%

of participating factories developed new recruitment policies and procedures



80%

reported improved interdepartmental and managerial interaction



15%

of participating factories modified existing processes

"The misconception about fees in the recruitment has been removed, workers in general think we need to pay to factory or to agents in a way or any other form. But now after the training workers are aware, especially the migrant workers come with the information that they shall not pay any fees for any kind to anyone. Employment is their choice and they have right to get the all the related information about the employment prior to joining the factory".

Participating Factory Manager

Working with partners and stakeholders to increase leverage and improve standards

We work with trusted partners to help us deliver greater impact within our business, supply chain or local communities. These include partners from a range of organisations – including membership groups, charity organisations, local and international NGOs, and unilateral and multi-stakeholder initiatives.

This can range from scoping risks within our risk identification process, 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.

Throughout this statement, we have provided case studies and examples of our work with stakeholders and partners and have included a full list of these in [Annex II – Our Partnerships](#).



Within this statement, we have reported on our due diligence on selected issues relating to access to decent work – such as living wages, purchasing practices, and freedom of association – that can contribute to or are related to ILO indicators of forced labour.

Living wages and purchasing practices

In 2021, as part of our Primark Cares strategy, we committed to pursuing a living wage for workers in the supply chain, supported by financial literacy training and access to social protection by 2030. More information on our work on financial resilience and social protection can be found in our [Primark Sustainability and Ethics Progress Report 2022/23](#).



Freedom of association and worker representation

We acknowledge and support the right to freedom of association. This enables workers to be aware of, and to exercise their fundamental rights at work. 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 in relation to freedom of association and collective bargaining agreements.
- We monitor and track alignment with the Supplier Code of Conduct, looking at whether the site 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 the audits that we conduct as part of our factory-level due diligence.
- We participate in programmes such as ILO Better Work and ETI Social Dialogue which strengthen and build the capacity of workers and management to understand and participate in mature industrial relations and social dialogue. More information on these programmes can be found in the table on worker focused programmes on [page 46](#).
- Ensuring that manufacturers, employer representatives, trade unions and brands are at the same table is the cornerstone of the ACT model. ACT currently operates in three key countries – Bangladesh, Cambodia and Turkey. Updates on ACT's activities in these countries can be found on the [ACT website](#).
- We engage and work directly with trade unions and other relevant stakeholders to resolve specific issues and grievances. In some cases, we have sought the involvement of national Arbitration Councils, the ILO, and multi-stakeholder initiatives including the ETI.

It is important that people, organisations, workers and their representatives can raise grievances directly with us and alert us to breaches of our standards, including any issues of modern slavery.

When grievances are raised, we take immediate steps to investigate thoroughly 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.

We work with specialist organisations and civil society on the provision of access to effective grievance mechanisms and on the investigation and remediation of grievances, enabling us to draw on specific technical expertise and support when needed.

We track, monitor and report on the key performance indicators related to grievances. See [Annex III – Key performance indicators](#).

Access to grievance mechanisms

Enabling people to access remedy through effective grievance mechanisms is a fundamental component of our Human Rights Due Diligence. Our approach is underpinned by the UNGPs and evolving regulatory requirements.

Any independent grievance mechanisms that we support must not undermine factory-based grievance mechanisms.

Our approach has five key elements:

1. Grievance mechanisms for our own employees;
2. Requiring our suppliers' to have their own operational-level grievance mechanisms for their employees and management;
3. Working with NGOs to develop and implement independent additional grievance mechanisms in sourcing countries and support existing ones;
4. Taking steps to augment our own mechanisms to further their accessibility by workers and affected stakeholders in our supply chain, and
5. Monitoring the effectiveness of the grievance mechanisms.

More information on our approach to grievance mechanisms can be found in our Primark Sustainability and Ethics Progress Report [here](#).

Grievance mechanisms for Primark employees

Employees have access to Speak Up, which provides a grievance mechanism for employees in all countries where we have operations, details of which are set out earlier in the document here. This was introduced last year and prior to this, employees had access to ABF's Speak Up policy, which is available [online](#).



Suppliers' own operational-level grievance mechanisms for their employees

For Primark's supply chain, our Supplier Code of Conduct requires all suppliers to establish their own effective and accessible grievance mechanisms for their own 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 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.

Working with stakeholders and industry to develop and implement additional grievance mechanisms in sourcing countries and support existing ones

In addition to the mechanisms described, we work with civil society and other organisations to develop bespoke grievance mechanisms that are available to a number of workers in our supply chain.

Care is taken to ensure these mechanisms do not undermine grievance mechanisms that are set up by suppliers at their own factories or worker committees or trade unions processes that may be in place.

Examples of these mechanisms include:

- **Industry sectoral mechanisms:** Primark is a member of multi-stakeholder initiatives ACT and the International Accord, which provide access to sectoral grievance mechanisms.
 - **Amader Kotha, Bangladesh:** Amader Kotha is a helpline established in 2014 as a mechanism for workers to report grievances in the garment sector in Bangladesh. It is an independent initiative available to all garment workers with the support of factories and brands. Primark's local team on the ground in Bangladesh play a critical role in building awareness of and trust in Amader Kotha in Partnership with Phulki, Elevate, and the Cahn Group, and repeatedly see an uptick in grievances from factories they have visited to talk about the hotline to workers and management. Between June and November 2022, the team undertook refresher training for over 6,630 workers and 212 managers at 34 factories. We've committed to scale Amader Kotha to all the factories in our Bangladesh supply chain by the end of 2024.
- We are also participating in the 'Safer Together' initiative of Amader Kotha run by Columbia Business School and their partners. This involves research into the effectiveness of a new reporting option for workers; a reporting escrow, whereby workers can choose to create a report with the helpline that is only escalated if a predetermined number of similar reports are made. The hypothesis is that workers may prefer to use this option rather than report something individually that they may lack evidence for. Primark hopes to use the learnings to inform developments within other similar initiatives available to workers elsewhere in its supply chain.

- **Hamary Awaz, Pakistan, and Ungla Kural, India:** In June 2023, we signed two new partnerships to establish independent industry-wide grievance mechanisms in Pakistan and India, named Hamary Awaz and Ungla Kural respectively. Both initiatives involve local our international partner, Elevate and NGOs trained as hotline operators and factory liaison staff to build trust among workers, an approach used successfully in Amader Kotha.
- **Worker Support Centre, Turkey:** The Worker Support Centre is a grievance mechanism operating in four languages, run by Turkish NGO, Refugee Support Center (MUDEM). Primark joined the project in 2020 and it has been introduced to more than 20 factories in our supply chain. The project was originally designed to focus on refugee workers in the garment industry and was only promoted in factories employing refugees. It has now been expanded to reach all workers and we are planning significant scale-up across our supply chain in 2024. Learning from Amader Kotha in Bangladesh, the Primark team in Turkey will work alongside staff from MUDEM to visit factories covered by the hotline to raise awareness and engage management and workers.
- **Working in collaboration on grievance mechanisms :** In addition to industry initiatives mentioned, in 2021, Primark and four other brands nominated three factories in Pakistan to join a programme run by Fairtrade Germany, with support from Deutsche Gesellschaft für Internationale Zusammenarbeit GmbH (GIZ) Pakistan. The project aimed to improve internal complaints mechanisms and solve incidents more effectively. It ended this year, giving us insightful learnings that will help shape our future grievance initiatives. For example, research under the project highlighted that many workers are unaware of the law surrounding grievance mechanisms. The findings also indicated that low literacy levels of workers hamper the roll-out of education around these programmes; and that refresher training is key to successfully engaging participants. An impact evaluation of this project found that over 90% of workers said they were satisfied or very satisfied with the new mechanisms set up through the project.

Monitoring the effectiveness of grievance mechanisms

We continuously review our approach to grievance mechanisms with an ambition to making effective grievance mechanisms available across as much of our supply chain as is possible.

We also continue to consider other ways of ensuring grievances can be raised by those who are impacted by our own operations, or the operations of our suppliers.

Improving the accessibility of our grievance mechanisms

We are working to ensure that Primark grievance mechanisms are made available and publicised in a wide range of languages so that they are accessible to workers in our supply chain and other stakeholders in the countries where we source our products.

We will take steps to familiarise suppliers, factories and workers with the mechanisms and ensure that the mechanisms are appropriately advertised to workers in a way that is tailored to the local context.

Care is taken to ensure these mechanisms do not detract or otherwise undermine existing grievance mechanisms set up by suppliers. Rather, these mechanisms are intended to complement the supplier-level and NGO mechanisms and to provide an alternative route for workers and affected stakeholders to raise grievances.

Providing for or cooperating in remediation when appropriate

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. For example, in 2022 we continued to develop our approach to the remediation of child labour.

We regularly 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 and the OECD.

Throughout our programme, we monitor the steps we take to address modern slavery by tracking indicators including:

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

Annexes

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 present in other sectors. We have outlined steps we are taking as part of our due diligence process to prevent and mitigate these risks.

Agency labour in supply chains

Workers hired through agency and labour providers can be particularly at risk of modern slavery. In 2019, we began a programme of enhanced due diligence on agency and labour providers in specific parts of the supply chain where we identified the workers most at risk, which included production, logistics providers, warehouses and recyclers in key countries in Western Europe, including the UK.

Our actions taken to address these risks:

- Identifying where agency labour exists in our supply chain;
- Heightened due diligence on agency and labour providers in production, logistics providers, warehouses and recyclers across key countries in Western Europe, including the UK and North Africa;
- Regular assessments of workplaces and of employment conditions where agency labour is used;
- Corrective action programmes at individual site level;
- Face-to-face training for UK suppliers; and
- Ban on sourcing garments manufactured in the UK.

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 at ginning and spinning mill level. We have prioritised the traceability of cotton within our Primark Sustainable Cotton Programme (PSCP).

Our actions taken to address these risks:

- Training for 299,388 farmers in more sustainable farming methods, surpassing our target of 275,000 farmers by end of 2023;
- Working with the ginners and spinners to segregate and trace PSCP cotton, and increasing the roll-out of due diligence on gins and spinning mills used in the PSCP supply chain.
- Spot checks using a forensic technology tool (Oritain), on a sample basis, to confirm the provenance of the cotton from within PSCP using forensic science techniques;
- Developing a strengthened approach to human rights due diligence at farmer level with technical experts, [Impactt](#). This work began in 2023 with development of a draft framework for application to our PSCP pilot in Turkey. Design and finalisation of the overall framework continues, alongside plans for further rollout; and
- Developing an enhanced traceability programme.

Cotton from Uzbekistan and Turkmenistan

State-sponsored forced labour within the cotton farming industry exists in Turkmenistan. Uzbekistan has more recently made efforts to eradicate state-sponsored forced labour within its cotton industry.

Our actions taken to address these risks:

- Signatory to the [Responsible Sourcing Network Pledge \(RSN\)](#) which sets out our commitment to not knowingly source Uzbek or Turkmen cotton. While the RSN campaign has now ended, as of November 2023, we continue to prohibit the use of cotton from these countries until such time that we are confident the risks of forced labour can be managed appropriately;
- Communication with suppliers and their factories when onboarding, and at other points when required, to ensure prohibition is implemented;
- On-the-ground checks in spinning mills in Bangladesh, India and Pakistan to assess origin of cotton bales, and;
- Engagement with key stakeholders working on policy and campaigns, including Anti-Slavery International (ASI).

Migration from Ukraine

Foreign workers fleeing conflict from Ukraine, could potentially be at risk of exploitation in destination countries. We carefully monitor for the risk of modern slavery and, so far, have not identified any issues related to Ukraine. However, we continue to keep a watching brief on this issue. We have learnt from our experiences in Turkey (see above) that a worker-centric approach is the right approach, while ensuring our suppliers are aware of and are implementing our requirements as set out in our Supplier Code of Conduct, for all workers equally and without discrimination.

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 work in this area has sought to address the touchpoints in the supply chain where the risks of modern slavery are heightened, including recruitment, and hiring practices in the workplace.

Our actions taken to address these include:

- Implementation of the My Journey Programme in mills to address recruitment and hiring practices;
- Encouraging factories to recruit management and other staff that can communicate with migrant workers such as migrant worker coordinators; and
- 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.

Forced labour in China

In 2019, we found we could no longer conduct effective human rights due diligence in the Xinjiang Uygur Autonomous Region (XUAR). In September 2020, we prohibited all Primark suppliers who make products on our behalf from using or sourcing products, materials, components, or labour originating from the region.

Our actions taken to address this risk:

- Obtaining our suppliers' written acknowledgement of compliance with our mandate, specifically naming several organisations from which they cannot source. This list is reviewed and recirculated to suppliers regularly;
- Any new factories onboarded are required to provide a supply chain map as a matter of course, and we carry out our own analysis to check for risk of exposure to the XUAR;
- Primark's ETES team in China have received specific training on how to monitor for the presence of XUAR labour;
- We've doubled the number of inspections our team conducts in Primark-approved factories throughout China as an additional due diligence mechanism in response to these risks
- Immediate suspension for any sites found using unauthorised subcontracting;
- Engagement with stakeholders – including civil society, governments, brands, industry associations – to discuss appropriate routes for remedy and prevention, including the ASI. We've also had discussions with members of [Coalition to End Forced Labour](#) in the XUAR where Uyghur representatives have been involved;
- Continuing to train suppliers on a regular basis around our traceability expectations. Last year, we ran training for all tier 1 suppliers on how legislation and supply chain due diligence are driving traceability requirements, and the challenges we'll need to work through together to ensure compliance. This year, we also ran face-to-face training with 48 suppliers in China highlighting the importance of traceability, why it matters and what is required from a Primark-supplier perspective;

- Spot checks using a forensic technology tool (Oritain), on a sample basis, to confirm the provenance of the cotton from within our PSCP using forensic science techniques;
- Establishing and building our partnership with [TrusTrace](#). Its traceability software and online platform allows us to gather data from the supply chain, from raw materials through to finished product. We started with the supply chains of products containing cotton, as it is our most used fibre, with a pilot involving suppliers that account for around a third of our cotton used. We have since expanded the programme to include more suppliers, fibres and products;
- We have recruited a dedicated Transparency and Traceability team within our Sourcing team to lead this programme. This team is based centrally in our Head Office and in our sourcing markets; and
- As a business, we comply with all relevant regulations as required in the markets in which we retail and from which we source. This includes compliance with any requirements under the US Uyghur Forced Labor Prevention Act (UFLPA).

Undocumented workers in Turkey

Undocumented foreign workers in Turkey, 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:

- A partnership programme with expert NGOs since 2016 to provide support and remedy for any undocumented refugees and foreign workers;
- Monitoring through audits and factory checks at factory and subcontractor level;
- Corrective action programmes at individual factory level where issues are identified; and
- Suspension of all factories suspected of using undisclosed subcontracting.

Myanmar

In September 2022, following the publication of the ETI independent assessment on responsible business conduct within Myanmar, we took the difficult decision to plan and implement a responsible exit from the country. The ETI's independent findings confirmed we could no longer conduct the necessary due diligence we insist upon to protect the safety and rights of the people who make our products.

Our actions included:

- Working closely with global trade union [IndustriALL](#) and other major brands to create a framework for responsible business disengagement from Myanmar with input from the [OECD's Centre for Responsible Business Conduct \(OECD\)](#). This new framework aligns with our long-standing global approach to responsible factory exit under the terms of our membership of ACT, but takes into account the very specific context of Myanmar post the coup in 2021 and the guidelines of the OECD. The framework has guided our responsible exit from Myanmar which is conducted with frequent consultation with IndustriALL and other relevant stakeholders. These included the ETI, the Myanmar Centre for Responsible Business, Eurocham Myanmar, Smart Myanmar, the ILO and local and international worker organisations.
- Our announcement to stop placing orders in Myanmar didn't mark the end of our efforts to support workers in the country, which has continued throughout the responsible exit process. We continue to work closely with factories, suppliers, trade unions, basic labour organisations and project partners to seek remedy for issues that arise and, where possible, build capacity for the factories' management and mitigate the impact to the workers in our suppliers' factories.
- Since October 2022, we've increased the size of our ETES team in Yangon from three to eight people, enabling more frequent visits to our suppliers' factories to allow greater engagement and improved visibility.
- We launched new events for groups of workers this year in our My Life programme with our partner [Girl Determined](#). Between 2019 and 2022, this programme trained 1,231 workers in our supply chain in Myanmar. Feedback from workers indicated that the communication skills of workers improved, in addition to a greater ability to identify and reduce stress. In July 2023, [Girl Determined](#) also delivered seven events to over 80 workers. These events focused on topics such as self-confidence, gender-based violence, self-defence and communication. Although these programmes will end when we exit Myanmar, they've delivered a positive impact for workers while they were being run.
- Final orders from Myanmar were shipped at the end of October this year with the Primark team ceasing operation in the region at the end of March 2024.

Partnerships and collaborations that help us on governance, best practice, policy and guidance.



Partnerships and collaborations that help us prevent and address the risks of child and forced labour.



Partnerships and collaborations that help us promote decent work in our supply chains.



Partnerships and collaborations that help us support worker empowerment and raise awareness of workers' rights.



Partnerships and stakeholders that help us address gender issues and support women's rights and women's empowerment.

60__decibels



Partnerships and collaborations that help us on research, evaluation and learning

60__decibels



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 indicators

- 98% of tier one suppliers' factories audited in calendar year 2022. *
- 89% of audits that were unannounced (apart from initial pre-production audits).
- 2,360 Number of audits in calendar year 2022.²⁰
- 0.41% of non-compliances under clause **Employment is Freely Chosen** of our Supplier Code of Conduct in calendar year 2022.²¹
- 0.24% of non-compliances under clause **Employment is Freely Chosen** of our Supplier Code of Conduct which were resolved in calendar year 2022.
- 65 incidents of unauthorised sub-contracting in the financial year 2022.

Number of programmes and projects in our supply chain

Number of initiatives supporting access to social protection and financial education and services, and % of workers in our finished goods supply chain in participating factories.

As of July 2023, we had five initiatives supporting access to social protection and financial education and services across 445 participating factories. These factories have 83,065 workers, representing 13% of workers in our finished goods supply chain.

Number of initiatives supporting skills development and % of female workers in our finished goods supply chain in participating factories.

As of July 2023, we had three initiatives supporting skills development in our supply chain across 29 factories. These factories have 44,264 female workers, representing 14% of female workers in our finished goods supply chain.

Number of factories participating in the Sudokkho initiative and % of female workers in the Bangladesh finished goods supply chain trained.

As of July 2023, the Sudokkho skills development programme has been run in 17 factories. These factories have 29,224 female workers, representing 18% of the female workers in our Bangladesh finished goods supply chain.

Number of initiatives supporting efforts to address GBVH, and % of workers in our finished goods supply chain in participating factories.

As of July 2023, we have five initiatives supporting efforts to address GBVH across 45 participating factories. These factories have 45,040 workers, representing 7% of workers in our finished goods supply chain.

Number of initiatives supporting the development of effective grievance mechanisms, and % of workers in our finished goods supply chain in participating factories.

As of July 2023, we have six initiatives supporting the development of effective grievance mechanisms across 91 participating factories. These factories have 187,657 workers, representing 30% of workers across our finished goods supply chain.

²⁰ This data has been assured by KPMG. Data up to 31st Dec 2022.

²¹ The methodology used for non-compliance clauses is Forced Labour, 'Employment is Freely Chosen'.

This will be reviewed over the coming year so we can include non-conformances more accurately in line with what a forced labour indicator is.

* 2% of factories were not audited during this period due to planned deactivation or Covid-19 backlog

Number of initiatives supporting the development of worker representation through democratically elected bodies, and % of workers in our finished goods supply chain in participating factories.

As of July 2023, Primark has three initiatives supporting worker representation through democratically elected bodies across 24 participating factories. These factories have 34,602 female workers representing 11% of female workers in our finished goods supply chain.

Number of initiatives supporting improvements to workers' physical and mental health and wellbeing, and % of workers in our finished goods supply chain in participating factories.

As of July 2023, we have 7 initiatives supporting improvements to workers physical and mental health and wellbeing across 118 participating factories. These factories represent 16% of workers in our finished goods supply chain.



Supporting workers to access external independent grievance mechanisms

Country	Bangladesh
Mechanism	Occupational Safety and Health Complaints Mechanisms
Provider	Bangladesh RMG Sustainability Council
Coverage	All (113) sites
Scope	OHS
KPIs	34 issues received and logged on the investigation tracker

Country	Bangladesh
Mechanism	Amader Kotha Helpline
Provider	Clear Voice, Phuki, Elevate
Coverage	61 factories
Scope	Safety and labour issues
KPIs	Between August 2022 and July 2023, 1135 substantive calls (genuine grievances) were made from workers in the Primark supply chain. 11 of these cases were escalated to Primark by Amader Kotha and resolved. As of end of July 2023 17 were outstanding.

This information was provided by Primark's partner – a third party – and has not been assured by Primark.

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	All (113) factories
KPIs	2 ACT dispute resolution mechanism (DRM) cases.

Country	Turkey
Mechanism	ISCSI Destek Worker Support Centre
Provider	MUDEMw
Coverage	26 factories
Scope	Labour rights for Syrian workers in Turkey
KPIs	2 ACT dispute resolution mechanism (DRM) cases.

Data on grievances 2022/2023

Grievance related to Code of Conduct⁵

Open/Pending	26
Resolved	42
Total	68

Grievances related to issues of forced labour*

Open/Pending	3
Resolved	6
Total	9

Grievance mechanism**

Open/Pending	31
Resolved	61
Total	92

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

** All calculations are based on unique cases only, regardless of trigger. All have been identified as grievances. These figures do not include the grievances raised through external independent grievance mechanisms. The figures do include grievances raised through other channels, such as those raised to auditors or through the customer service section of our website.

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

Primark is a partner member of the ILO Better Work programme which operates in key sourcing countries.

Better Work conducts monitoring of sites and provides capacity building for management and workers, including offering training on preventing and addressing sexual harassment for workers, middle managers and supervisors. Central to Better Work is the establishment of factory committees to support worker-manager communication. Women are highly encouraged to join the committees and at least 50% of members must be female. Better Work has designed a programme to help female workers deal with situations in the workplace and develop leadership skills that they use to better represent themselves and their colleagues. The programme has also helped women to address the resistance they often receive from family members to join factory committees.²²

Implementation partner: ILO Better Work

Company IQ, China (2018–present)

Company IQ supports factories to implement the use of a mobile app that helps to improve transparency of human resources practices, facilitate better communication between management and workers and provide training for workers on multiple topics, including labour rights. The app also provides a function for workers to raise grievances.

Project partner: MicroBenefits

Drama for Change, Vietnam (2022–present)

Drama for Change aims to increase awareness of sexual harassment in the workplace through drama and role play.

Project partner: Atelier Theatre et Arts (ATH)

EHS Now!, China (Feb 2023 - present)

The programme supports workers and management to better address health and safety issues in factories.

Implementation partner: Meaning Advisors

ETI Social Dialogue, Bangladesh (2016–present)

The ETI's Social Dialogue programme in Bangladesh strengthens the capacity of worker participation committees and helps workers and management understand their rights and responsibilities. ETI Social Dialogue, Bangladesh (2016–present) .

Project partner: Ethical Trading Initiative (ETI)

Gender Sensitive Workplace Programme, Bangladesh (2020– April 2023)

The Gender Sensitive Workplace Programme promotes gender-friendly workplaces through gender sensitisation training and the creation of sexual harassment complaint committees.

Project partner: Ethical Trading Initiative (ETI)

Grievance Management Project, Pakistan (February 2022 – April 2023)

Grievance Management Project supports textile factories in setting up internal complaints structures and developing their existing grievance mechanisms.

Project partners: German Development Cooperation (GIZ), Fairtrade Germany

Hamary Awaz, Pakistan (June 2023-present)

Hamary Awaz in Pakistan is an external and independent grievance mechanism operated by a third-party to provide workers with a trusted, accessible means to raise concerns. Through the helpline, workers report on substantive issues in their factories, including health & safety concerns, wage compensations, leave, termination and other general inquiries.

Implementation partner: Elevate, Baidari

Industrial Relations Training, Bangladesh (Jan 2023 - present)

The training programme aims to build the capacity of factories in the area of industrial relations.

Implementation partner: Just Solutions

²² <https://betterwork.org/wp-content/uploads/2020/01/SHP-Thematic-Brief.pdf>

Janabo (July 2016 - ongoing)

Janbo Mora Janabo supports factories to educate workers on fire safety through the medium of drama performance

Implementation partner: Project led by Primark

JustMaxIt, Turkey (2022–present)

JustMaxIt strengthens communication channels between workers and management and, empower workers to raise and negotiate issues in a more informed way.

Project partner: JustMaxIt

Maitri, India (Sept 2022- present)

Maitri establishes basic counselling services by training selected factory staff and engaging with workers and managers to prevent GBVH.

Implementation partner: St John's Medical College

Moner Kotha, Bangladesh (2022–present)

Moner Kotha establishes basic counselling services in factories by training selected factory staff using medical professionals and engaging with workers and managers to reduce the stigma around mental health.

Project partners: British Asian Trust, Sajida 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.

Project partner: Project led by Primark

My Life, India (2017–present)

My Life in South India supports factories to train workers in basic life skills, including health and safety in the workplace, rights and responsibilities, communication, and teamwork.

Project partners: Women Win, Maitrayana Charity Foundation

My Life, Myanmar (2019–2023)

My Life (Myanmar) delivered in-factory training on life skills such as workplace rights and responsibilities, communication and health, using play-based learning techniques.

Project partners: Women Win, Girl Determined

My Space, India (2018–present)

My Space aims to support the mental health of workers in selected factories in South India by providing counselling services in factories and training factory-based counsellors.

Project partner: St John's Medical College

Pashe Achi (March 2015 - ongoing)

The programme aims to build the confidence and knowledge of those impacted by the Rana Plaza tragedy, so that they can manage their financial compensation.

Implementation partner: University of Dhaka

Paving a Pathway Towards Financial Health for Vietnam's Garment Workers, Vietnam (Oct 22-present)

A partnership with Standard Chartered Bank, and IDEO to research, design, and develop a programme or intervention that can be piloted to improve the financial health of young garment workers in Vietnam.

Implementation partner: Standard Chartered Bank, and IDEO

Promising Future, China (2018–July 2023)

The Promising Future programme for workers in China aims to raise awareness and understanding of China's complex social insurance system among workers and factory management, and support access to social insurance.

Project partner: Carnstone

Refugee Recruitment Support, Turkey (2022–present)

The Refugee Recruitment Support encourages and supports refugee recruitment by providing direct advice on work permit applications, recruitment services and training to factory managers.

Project partner: United Work

Refugee Support Programme Hotline, Turkey (2020–present)

Refugee Support Programme Hotline supports Syrian refugees to access legal services, language assistance and worker rights information, including a GM hotline.

Project partner: Refugee Support Center (MUDEM)

Respectful Workplace Programme, Vietnam (2022–present)

The Respectful Workplace Programme with IFC focuses on preventing and addressing GBVH with suppliers through training and coaching.

Project partner: International Finance Corporation (IFC)

Securing Futures, India (2022–present)

Securing Futures trains selected factory representatives to teach workers how to access social insurance benefits.

Project partner: Project led by Primark

Seth Yerng – Our Rights, Cambodia (2021–Nov 2022)

Seth Yerng is an app-based worker programme delivered in partnership with the Deutsche Gesellschaft für Internationale Zusammenarbeit GmbH (GIZ) and other international brands. The app provides workers with information about the most important labour laws and occupational health and safety regulations in the workplace in an interactive manner. The app also contains a wage calculator to help workers understand how their wages are determined.

Project partner: Deutsche Gesellschaft für Internationale Zusammenarbeit GmbH (GIZ)

SMART, Myanmar (2021–present)

SMART provides training and coaching for factories across several topics including social assessments, worker/management committees including elections, supervisory skills training and applied labour law, social dialogue, human resources and occupational health and safety.

Project partner: SMART Myanmar

Snowball, Turkey (2021–present)

Snowball supports gender equality through training factory management and workers and supporting the development and monitoring of factory gender equality plans.

Project partner: Mother Child Education Foundation (ACEV)

STOP Project, Cambodia, Vietnam (2019–May 2023)

The Enhancing Women's Voice to STOP sexual harassment (STOP) project programme with Care International develops, tests and adapts workplace models for preventing and responding to sexual harassment. The project focuses on supporting factories to establish and maintain effective workplace mechanisms to prevent and respond to sexual harassment.

Project partner: Care International

Sudokkho, Bangladesh (2016–present)

The Sudokkho programme helps factories introduce an efficient in-house training system for both new and existing sewing operators, most of whom are women. They receive quality technical training which improves their productivity and can often open up opportunities for promotion.

Project partner: Rajesh Bheda Consultant (RBC)

The Bridging Solution, Bangladesh (2022–present)

The project is a pilot of a new Employment Injury Scheme (EIS) for garment workers in collaboration with ILO and other brands.

Project partner: ILO

Ungal Karal, India (June 2023- present)

Ungal Karal in India is an external and independent grievance mechanism operated by a third-party to provide workers with a trusted, accessible means to raise concerns. Through the helpline workers report on substantive issues in their factories, including health and safety concerns, wage compensations, leave, termination and other general inquiries.

Implementation partner: Elevate, INNO

