



PRIMARK®

# Sustainability and Ethics Progress Report

2023/24

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# Foreword from our Chief Executive



Offering more sustainable choices for customers is central to our brand. With the majority of our clothes now made from recycled or more sustainable materials, it's the perfect time to show that Primark Cares is more than just a label. Moving forward, our Primark Cares strategy will continue to be truly woven into every part of our business and integrated into our Primark brand."

**Paul has been Chief Executive at Primark for 15 years. Under his leadership, Primark's sustainability ambitions have accelerated to become a core strategic priority and part of our 2030 vision.**

The theme of this year's Sustainability and Ethics Progress Report, Update and Evolve, reflects the many changes and developments across Primark over the past 12 months. Our customers will have started to notice a new look for Primark as we launch our refreshed brand look. We've also continued to expand into new locations and countries, including Hungary as our 17<sup>th</sup> market. We've strengthened our commitment to the high street through our continued investment in our stores and our communities. Celebrating 50 years of Primark in Great Britain, our largest market, was a particularly proud moment for me.

This year we've seen some volatility, leading to disruptions both in our sourcing countries and closer to home. The pace of legislative change is also pushing our industry to adapt and evolve. Amid these changes, we've remained focused on upskilling our people, particularly around sustainability, to further embed our commitments in our business and supply chain. I am pleased by the progress we've made in making sustainability a part of Primark's DNA. Whether it's through new roles in our sourcing markets or training our Product Teams on designing more durable and recyclable clothes, being more sustainable is now woven into how we do business every day.

One of the things I valued this year was visiting our partners and suppliers in a number of our sourcing markets, something I continue to prioritise. These visits not only strengthen our collaborative relationships, but they help us continue to work with our suppliers to deliver the quality and innovation that our customers love and expect. Earlier this year, whilst in Bangladesh, I had the opportunity to visit the facilities of our partner Recover™, who is helping us expand our use of recycled cotton fibre.

Offering more sustainable choices for customers is central to our brand. With the majority of our clothes now made from recycled or more sustainably sourced materials, it's the perfect time to show that Primark Cares is more than just a label. Moving forward, our Primark Cares strategy will continue to be truly woven into every part of our business and integrated into our Primark brand. This is a new and exciting era where we'll refresh how we show up and talk about Primark, while continuing to deliver for our customers, partners and colleagues. The Primark Cares strategy is still very much a priority for our business, and we will continue to celebrate our successes and progress.

I truly believe that we must lead by example, especially in a time of industry transformation. That's why we introduced sustainability KPIs for all Directors this year, encouraging our senior leaders to bring it into their everyday.

At Primark, people are at the heart of everything we do. I remain proud of our ability to adapt and evolve. I take pride in connecting with the talented teams who play a significant role in the designing and manufacturing of our products and supporting Primark's commitment to become a more sustainable business. Every day, I'm inspired by our people, brand and customers. Their passion and innovation keep me driven and always looking forward.

**Paul Marchant**  
Chief Executive

# A message from our Primark Cares Director



“I’m proud of the way sustainability initiatives are woven into everything we do at Primark, but I especially appreciate the hard work that goes into measuring their impact. Knowing how far we’ve come as a business means we can better scope out the challenges ahead and move forward at an even faster pace. It also means our stakeholders can follow our journey and hold us accountable for our progress.”

**Lynne is responsible for leading the delivery of Primark’s sustainability strategy across the business and more widely through our supply chain.**

In the three years since we launched our Primark Cares commitments, I have really seen our confidence in this area grow significantly. The dedication and enthusiasm shown by our colleagues, suppliers and partners is extremely encouraging as we advance our strategy.

We are proving that it’s possible to make sustainability affordable for all. The insights we’re gaining now will be crucial as we move towards 2030 and beyond. One thing we’ve learned is that consumers continue to seek guidance on how they can play a part. As a brand for everybody, we see it as our responsibility to help consumers make informed choices, all while maintaining the affordability that they know and love us for. Our in-store repair workshops are a great example of how we’re continuing to engage with our customers, having hosted just under 400 sessions in three years.

We also see a huge opportunity to empower our people. With over 80,000 colleagues across 17 countries, we have a strong presence in many communities and the ability to inspire conversations on better choices in our stores every day. Our goal is to support our colleagues so they can better understand the changes we’re making and their role within this.

We continue to listen to our customers and colleagues and focus on the things that matter to them. One of these is tackling single-use plastic and we’ve intensified our efforts to reduce plastic hangers in-store by switching to hangers made from recycled materials and encouraging reuse.

Collaboration continues to be essential in driving industry change. By working together, we’re making progress on important issues like reducing waste and improving durability. We’re especially proud to have launched our Durability Framework this year. This was developed with the support of industry stakeholders, including WRAP, and with other retailers so industry-wide progress can be made. Primark continues to sit on the Fashion Advisory Board for the Ellen MacArthur Foundation. I also joined the Textile 2030 Advisory Group this year, a key initiative to drive sustainability and circularity within the fashion industry.

I’m proud of the way sustainability initiatives are woven into everything we do at Primark, but I especially appreciate the hard work that goes into measuring their impact. Knowing how far we’ve come as a business means we can better scope out the challenges ahead and move forward at an even faster pace. It also means our stakeholders can follow our journey and hold us accountable for our progress. That understanding drives us on every day.

**Lynne Walker**  
Primark Cares Director

# About Primark

Primark was founded in Ireland 55 years ago in 1969 as Penneys to provide affordable clothing and lifestyle products for families. Today, our principles are the same: we want our customers to trust that we will always offer the best prices without compromising.

Our purpose is to create maximum joy at minimum cost. We make looking good and feeling good cost less. We've always been about affordability but nowadays that means so much more to us. Affordability should not only mean low prices but should also be linked to quality, longevity, ethics, sustainability, accessibility, and community impact. Our purpose will keep evolving to help the customers we serve.

**£9,448m<sup>1</sup>**  
2024 Revenue

**17<sup>2</sup>**  
Sourcing countries

**£1,108m<sup>1</sup>**  
2024 adjusted operating profit

**2,536<sup>Δ3</sup>**  
Number of ethical trade social audits

**82,123<sup>1</sup>**  
Number of colleagues

**66%<sup>Δ</sup>**  
of our clothing unit sales contain recycled or more sustainably sourced materials

**17<sup>Δ1</sup>**  
Markets

**36**  
External partnerships supporting workers in our supply chain

**451<sup>1</sup>**  
Stores

**21**  
Social impact programmes supporting workers in our supply chain

Metrics independently assured by Ernst & Young (EY) against the International Federation of Accountants' International Standard on Assurance Engagements Other than Audits or Reviews of Historical Financial Information – known as ISAE 3000 (Revised). These are highlighted in this report with the symbol Δ.

1. Data as per ABF's financial year end of 14<sup>th</sup> September 2024.
2. Figures based on our Global Sourcing Map, updated in November 2024: <https://globalsourcingmap.primark.com/>
3. Data as per year end of 31 December 2023.

# Embedding sustainability through Primark



“Finance collaborates closely with colleagues across Primark to help understand the financial impacts of our Primark Cares strategy, while also making sure processes and data are robust and auditable. This means we can continue to tell our story in a confident and transparent way, which is crucial as regulations evolve. Our work in this space has also provided much broader career opportunities for finance colleagues as we integrate the Primark Cares strategy into our colleagues’ day jobs.”

Peter Rogan, Finance Transformation Director



“Our Primark Cares strategy is at the heart of decision-making in my team. The work we’re doing to eliminate single-use plastic is challenging so we’ve had to think creatively to help drive change at pace and optimise the impact of our investments. Critical to this is working in close collaboration with our suppliers, who have had to think differently about how they work with us in order to meet the demands of our roadmap. We can only drive real sustainable change at this scale together.”

Laura Cook, Procurement Director



“This year, we’ve created KPIs for our suppliers to support the delivery of our Primark Cares strategy. We hope these metrics will drive awareness, improve performance and support suppliers to progress. This includes the introduction of mandatory supplier greenhouse gas (GHG) carbon targets, in addition to pushing the adoption of the HIGG Index across our suppliers’ factories. We hope to include other metrics in the future.”

Matthew Rhodes, Sourcing Director



“My team is responsible for the transportation of our products from factory to shopfloor. As we ship the majority of our products by sea, we’ve been focused on finding ways to reduce the carbon emissions of long ocean voyages from Asia to Europe and the US. This year, we’ve invested in the increased use of ocean biofuel in partnership with Maersk. This will help reduce our shipping carbon emissions in the near-term but also demonstrates our commitment to investment in alternative fuels for ocean shipping.”

Barry Wallace, Logistics Director



“Our Primark Cares strategy gives Primark a strong foundation from which to build out and embed compliance with current and upcoming regulatory requirements. The EU Green Deal and other sustainability-related regulations will enable our business to move forward with our commitments while raising the standards for our sector in relation to environmental, social and governance principles.”

Eleanor O’Shaughnessy, Risk and Compliance Director

# How we do business

Everyone is welcome at Primark. We cater for customers of all ages, sizes and incomes and offer everything from basic tees and winter coats, to premature babywear and post-surgery breast cancer garments. Our ability to make great fashion affordable for everyone for more than 50 years is driven by the **lean, simple and efficient way we work.**

## Operational efficiencies



Our model is simple and lean. We have one value chain and use sea freight to get products to our stores, so we can keep our costs affordable for our customers.

## Buying model



We design and source for all our markets centrally and benefit from economies of scale through our orders. Over half of what we sell is everyday basics such as underwear, t-shirts and jeans, which we can order during off-peak manufacturing times to reduce costs further for our customers. We're focused on affordability, but we're not a discount business. We don't buy for sales like some retailers, and have little excess stock and few markdowns.

## Supply chain



We have long relationships with our suppliers and share factories with other major brands. We wouldn't call ourselves fast – our average product journey across our value chain is six months, with the sea freight we use to ship our products taking up to 10 weeks to deliver to our stores. Less than 2% of our overall freight is air, resulting in lower carbon emissions.<sup>1</sup>

## Marketing



We are very targeted with our customer marketing investments, and benefit from a 24 million-strong social media following, who help drive awareness and demand.

1. Based on tonnage km

# 2023/24 Highlights



Colleagues, Inclusion and Community Impact

More than **1,700** colleagues joined our two-day **Primark Connect** event, showcasing our vision for 2030 and how sustainability and ethics are integral to the way we are moving forward as a business.

More than **300 colleagues** globally were involved in defining our updated values: **Caring, Dynamic and Together**, which launched this year.

We launched our **first adaptive range** to support those with limited mobility.

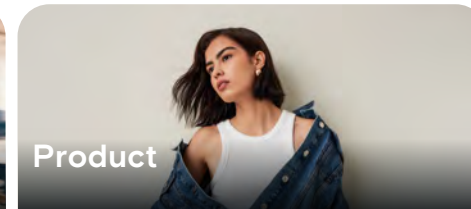


People

We've launched a new project with **Vision Spring** to provide **glasses** to workers in **nine** factories in India, Bangladesh and Vietnam.

Our skills development programme **Sudokkho** has been rolled out across **28 factories in Bangladesh**.

We signed a legally binding agreement to support **collective bargaining in Cambodia's garment and footwear sector**, a key milestone for workers and the industry.



Product

We launched our **Durability Framework** designed to give clothes a longer life. **66%** of our clothing tested has passed the aspirational level of 45 washes.

In three years, we've hosted **393** repair workshops across France, Italy, the Netherlands, UK and Ireland, offering **7,157 places**.

**3%** of our clothing unit sales this year were circular by design. **529 colleagues** have completed our foundational Circular Design training.



Planet

We launched a new performance metric requiring our top **100 suppliers to set greenhouse gas (GHG) emission reduction targets**.

Through our partner Maersk, we've introduced green fuel alternatives, such as **biofuel**, when shipping some of our products, emitting approximately **40% less GHG emissions** annually than traditional fuel.

Our carbon emissions across Scopes 1, 2 (Market based)<sup>1</sup> and 3 compared to last year declined by **11.6%** a total decrease of **1.9% Δ** since 2019 baseline.

1. Scope 2 emissions for the 2018/19 baseline year were calculated using the location-based method, which uses location-specific grid-average emissions factors. As Primark did not procure any renewable or low carbon power at that time, it is considered an appropriate methodology to establish baseline impact. For 2023/24, we are reporting under the market-based method, taking into account Primark's energy contracts and their associated emissions factors. We consider this to be a more accurate calculation method that can reflect the improved emissions performance achieved from renewable energy procurement.



# Primark Cares Commitments

**Primark Cares is our commitment to doing better as a business. This means making more sustainable products everyone can afford, reducing our impact on the planet and supporting the livelihoods of the people who make our clothes.**

To realise these goals, we're changing how we design and make our clothes, from the materials we use to how we work with our suppliers to how our products are packaged and shipped.

Our Primark Cares strategy builds on the work of our Ethical Trade and Environmental Sustainability (ETES) team, established over 15 years ago.

With a focus on three areas, Product, Planet and People, our strategy stretches until 2030 and is 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.



# Sustainability and ethics governance

We have a comprehensive governance system to oversee sustainability and ethics covering all our Primark businesses. Our CEO and Senior Directors are responsible for, and central to, all decision-making and implementation. Relevant topics are fed into the wider business governance strategy as needed. Our parent company, Associated British Foods plc (ABF), provides further oversight. Relevant topics related to ethics and sustainability, which are material at the ABF level, are discussed with the ABF Group CEO and Board both annually and when appropriate.

## Primark Cares Executive Steering Committee

Frequency: Quarterly

This Committee reviews progress of the Primark Cares commitments, in addition to risks and opportunities related to the strategy delivery. This helps ensure Primark Cares is embedded in wider key business strategies, initiatives and functions.

It is chaired by the Director of Primark Cares and members include the Primark CEO, the Primark Executive Committee, ABF Director of Legal Services and Company Secretary, Primark Director of Legal and other Director-level stakeholders.

## Primark Cares Steering Group

Frequency: Every eight weeks

This group supports the Primark Cares Executive Steering Committee, signing off project milestones and providing strategic direction to the Working Group. It also acts as an escalation point for commitment delivery risks and issues. It is chaired by the Director of Primark Cares and members include cross-functional leaders (Director-level and Head of Level).

## Primark Cares Working Group

Frequency: Every four weeks

This group is responsible for the day-to-day delivery of the Primark Cares commitments as well as supporting key functions to implement changes and new approaches. Sub-working groups are created as required.

## Policy and Compliance Forum

Frequency: Every six weeks

This forum discusses emerging policy and assurance requirements. It also supports discussions on product compliance to enable efficient decisions. Any outputs from this forum are cascaded across relevant teams in the business as required.

## Topic-specific Steering Committees

Frequency: As required

Matters related to human rights due diligence in our supply chain that require ongoing, cross-functional discussions are raised through our Steering Committees. Meetings are set up when required and bring in relevant internal stakeholders. These committees give guidance and propose appropriate actions that are subsequently reviewed and signed off by the Primark CEO and Primark Executive Team. Solutions are also discussed with the ABF Group CEO and Board when necessary.

# Our commitment to people making our products

## Our presence in our sourcing markets

Our ETES team has more than 130 people present in 10 key sourcing countries. We also have Primark colleagues focused on Product Sustainability, Quality and Sourcing based locally in some of these markets.

- Ethical trade and Environmental Sustainability team
- Quality, Product, Sustainability and Sourcing team

### Türkiye projects

- Safety on site (SoS) - AKUT
- MUDEM - WSC
- Snowball

9 1

### Pakistan projects

- Hamary Awaz

3

### Bangladesh projects

- Clear Vision Workplace
- Tell Us
- Industrial Relations Training
- Sudokkho
- Amader Kotha Hotline
- Moner Kotha

22 15

### China projects

- C-IQ Worker App
- EHS Now!
- Handshake Worker's Hotline

33 21

### South East Asia projects

#### Cambodia

- Responsible Wage Digitization

3

#### Vietnam

- Bright Futures
- Drama for Change
- Clear Vision Workplace

6

### India projects

- My Life
- Clear Vision Workplace
- My Space
- Maitri
- Securing Futures
- Haqdarshak

21 4

We continue to push for fair and safe working conditions for workers in our supply chain, as set out in our [Supply Chain Human Rights Policy](#). This is underpinned by the [United Nations Guiding Principles on Business and Human Rights \(UNGPs\)](#).

Our Supplier Code of Conduct<sup>1</sup> translates our human rights commitments into specific requirements all suppliers must comply with. It covers workers' rights such as freely chosen employment, freedom of association, safe working conditions and wages. It also addresses discrimination and prohibits all forms of modern slavery.

Our Supply Chain Human Rights Policy and Supplier Code of Conduct underpin the work of our ETES team who are responsible for managing human rights due diligence (HRDD) in our supply chain. Their HRDD work is the basis for all our activities under the People pillar of our Primark Cares strategy. Our ETES programme and wider People commitments share a common goal: to protect and improve the lives of the people who make our clothes. More information can be found [here](#) and our [Modern Slavery Statement](#).

This year we ran

# 21 initiatives

for workers in factories across our supply chain

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

## Our commitment to people making our products



### Our Social Audit Monitoring Programme

Under our social audit monitoring programme, tier one factories<sup>1</sup> approved to make our products are audited at least once a year.<sup>2</sup> Like most clothing brands, we don't own the factories where our products are made but these audits check whether our suppliers and their factories meet our [Supplier Code of Conduct](#) requirements. They are managed by our teams in sourcing markets, who understand local regulations and are trained to identify risks and work with suppliers and factory management to drive workplace improvements. The programme is governed centrally by Primark's Head Office. We bare the full cost of these audits, which are undertaken by Primark or a third-party on our behalf, and most of which are unannounced.

Any new factory must undergo a social audit as part of our onboarding process. No orders are placed until the factory has been audited and approved.

Following an audit, supplier factories are issued with a corrective action plan (CAP) that outlines areas for improvement. In cases where we have identified high or salient risks to workers, we implement additional due diligence activities. These include many of the social impact programmes that fall under our Primark Cares commitments, such as our My Life programme for vulnerable migrant workers in India.

We continue to expand the scope of our social audit programme into other areas of the supply chain.

### Risk identification and action

We conduct due diligence to identify risks throughout our business, aligned with industry best practice. Our approach focuses on the following:

- **Country risk assessments:** we use external reports and publicly available, credible information sources to build assessments for every country we source from. This includes political, economic, social and legal analysis and risk-mapping. Assessments look at both the garment and footwear sector, in addition to other sectors and industries. This helps us to understand the risk profile of our sourcing countries, and causes of the risks, in addition to identifying stakeholders we can engage with locally.

- **Analysis from our own data:** our local teams monitor our supply chain to ensure our workplace standards and policies are being met, and to help prevent and manage risk. Data from our social audit programme is central to this.
- **Stakeholder engagement:** external stakeholders are a vital source of information and guidance. They help us understand the risks in our supply chains, how to identify them, and which groups may be most vulnerable. External stakeholders also assist in the development of strategies and approaches to prevent or resolve issues. Read more [here](#) on our engagement.
- **Rights holder consultation and worker engagement:** garment workers have clearly defined rights, yet are often excluded from the due diligence process or face obstacles in getting their voices and views heard. We have built trusted partnerships with local and regional stakeholders to give us ongoing insight into workers' needs. Our local teams also regularly engage with factory management and workers. This provides important feedback about the issues they face, and the impact of our work with them.

### Worker engagement and grievance mechanisms

Direct engagement with workers is fundamental to supporting our commitment to decent and safe workplaces. Our local teams speak directly with workers during audits and through our social impact programmes. This enables us to better understand and respond to their workplace needs and experiences.

Grievance processes – or mechanisms which enable workers to raise issues in the workplace – are an important aspect of workplace rights, which is why they are part of our Supplier Code of Conduct.

1. Tier one factories are factories manufacturing finished goods in our supply chain.  
 2. 98% of tier one suppliers' factories were audited in calendar year 2023. 2% of factories were not audited during this period due to planned deactivation.

**Our commitment to people making our products**

We're committed to making effective and accessible grievance mechanisms available to all our colleagues and people in our supply chain. This includes:

- having grievance mechanisms which allow for anonymous reporting
- expecting all Primark-approved factories to have grievance mechanisms available to their workers that are effective, as defined by UNGPs principles
- working with third parties, including NGOs, to implement industry-wide grievance mechanisms in our sourcing countries and support existing ones such as Amader Kotha
- developing and launching a separate, widely available, Primark-funded grievance mechanism called Tell Us that will be accessible to all workers and relevant stakeholders in our supply chain. We launched Tell Us in Bangladesh in December 2023. It was rolled out to a further 21 countries by the end of August 2024 to suppliers making goods both for resale and not for resale.

We plan to continue expanding the training and awareness of this mechanism to all our sourcing and retail locations by the end of 2025.

We also receive grievances through other channels, including the customer services section of our website, confidential worker interviews during social audits, and workers having direct contact with Primark colleagues and our partner organisations. When issues or grievances are raised, we take steps to investigate thoroughly while protecting the confidentiality of those raising the complaint, and anyone else who might be affected. We do not tolerate any retaliation against those who have raised a grievance or against any affected stakeholders.

Our teams closely monitor the use and uptake of these grievance mechanisms, engage with the partners and factory management, and support remediation as required. Where successful, we are working to expand access to these mechanisms across our supply chain. During the year, we have supported the roll-out of five initiatives focusing the development of effective grievance mechanisms across 212 participating factories.<sup>1</sup>

**Expanding access to grievance mechanisms in our supply chain**

<b>Hamary Awaz</b>	Pakistan	In partnership with global assurance provider LRQA and local partner Baidarie, we are piloting this external grievance mechanism (which means 'our voices' in Urdu).
<b>Handshake Workers' Hotline</b>	China	This year we joined Handshake grievance mechanism in partnership with local partner <u>INNO</u> .
<b>Worker Support Centre</b>	Turkey	We've been working with local NGO partner MUDEM to encourage workers in Turkey to use the <u>Worker Support Centre</u> grievance mechanism. This is the final year of this partnership.

**Scaling up access to independent grievance mechanisms**

The Amader Kotha hotline is an independent, industry-wide grievance mechanism which has been run for the past 10 years by local NGO partner Phulki, with global assurance provider LRQA. It was set up following the Rana Plaza tragedy to give workers a way to report safety concerns, and it has since evolved into the widespread mechanism it is today.

This year, we supported the introduction of Amader Kotha's new eLearning platform for factory managers, to help embed the hotline across their workforce.

Building on the success of Amader Kotha in Bangladesh, we have signed new partnerships to establish similar grievance mechanisms in Pakistan.



1. Data from our Global Sourcing Map up until 31 July 2024. It is updated annually and was last updated in November 2024: <https://globalsourcingmap.primark.com/>

## Our commitment to people making our products

### Structural integrity

Workers who make our clothes have the right to a structurally safe working environment. [The Primark Structural Integrity Programme](#), established in 2013, helps us assess the safety of our suppliers' factory buildings against international standards. We survey the tier one sites of our supplier factories in Bangladesh, Pakistan and Cambodia, and tier two sites in Bangladesh and Pakistan, as well as providing ad hoc support as needed in other sourcing countries. Find out more [here](#).

Primark is also a signatory to the [International Accord for Health and Safety in the Garment and Textile Industry](#), which operates in Bangladesh and Pakistan currently.

### Partnering with suppliers

As is typical with large retailers, we don't own the factories in our supply chain but work in partnership with suppliers to make our products. Supplier engagement sits across several teams, including Buying, Merchandising, Quality, Sourcing, Product Sustainability and ETES. Strategic supplier relationships are led by our Sourcing team who engage regularly with suppliers to collaborate and help manage any local issues.

Our long-term ambition is to build stronger strategic supplier relationships to help drive progress in our Primark Cares commitments. We have developed some key performance indicators (KPIs) that will strengthen our relationships with suppliers who support our sustainability strategy, and who intend to develop more around HRDD in the future.

Our global supply chain spans

# 17 countries<sup>1</sup>

### Supplier and factory exits

We value our existing supplier relationships. However, should we need to stop working with a factory or supplier for any reason, exits are managed by our Sourcing and ETES teams. This is in line with the expectations of responsible business conduct laid out by the [Organisation for Economic Co-operation and Development \(OECD\)](#) and as set out in our Supply Chain Human Rights Policy, as well as through our active membership of [Action, Collaboration and Transformation \(ACT\)](#).

### Transparency and traceability in our supply chain

Supply chain traceability is a complex and ever-evolving area. We continue to advance our processes in this context. Our online [Global Sourcing Map](#) covers tier one factories that make our products, in addition to showing the number and gender of workers at each site shown.

Read more about our commitment to transparency and traceability [here](#).

Most Primark suppliers have worked with us for more than

# seven years

Our longest-standing supplier has worked with us for more than

# 24 years

### Effective worker dialogue mechanisms

Labour disputes between workers and factory management can happen within supply chains. We continue to encourage effective worker dialogue mechanisms through our social impact programmes. As of July 2024, we support the initiative Industrial Relations in Bangladesh, which encourages worker representation through democratically elected bodies across 26 participating factories.<sup>1</sup>

This trains suppliers on dispute resolution, relationship building, and promoting a positive working environment.



1. Figures based on our Global Sourcing Map, updated in November 2024: <https://globalsourcingmap.primark.com/>

2. Data from our Global Sourcing Map up until 31 July 2024. It is updated annually and was last updated in November 2024: <https://globalsourcingmap.primark.com/>



# Colleagues, inclusion and community impact

We want our colleagues to work in an environment where they feel empowered and inspired to do their best work every day, positively impacting our customers, partners, suppliers and the communities we support.



Over  
**80,000**  
colleagues representing

**176**  
nationalities.



Over

**630**

colleagues now  
trained as Mental  
Health First  
Responders.



**Four**

new commitments to  
drive inclusion and  
accessibility at  
Primark.

# Engaging and connecting our colleagues

## Launching our new values and behaviours

**Our new values and behaviours – Caring, Dynamic and Together – were launched across our global business this year.**

We sought to create an ambitious direction for 2030 and were unanimous that culture would play a key role in this. We had not previously clearly defined the culture we wanted across Primark. Colleagues desired more clarity on what's expected of them and what's most important to our culture.

The first step was to create a unified, global view of our desired culture through a new set of values – Caring, Dynamic, Together. These values and the supporting behaviours make it clear what culture we need to help us to protect the best bits of Primark, yet also to evolve to help achieve our 2030 ambitions.

Co-created by our people with over 300 colleagues involved, these values describe how it feels to work at Primark, and how we show up as an organisation. They retain the best bits of our existing culture, while guiding how we continue to work together to ensure Primark remains a fantastic place to work, learn, grow, create and succeed.

We know that our leaders are vital to embedding new values and behaviours, so we initially brought our senior leaders at a dedicated event in June 2023. We then engaged all our colleagues globally through an extended communications and engagement campaign via a number of channels including videos, in-person events, culture workshops, newsletters and posts on our colleague app. We also established a dedicated values and behaviours channel on our Digital Learning Platform where colleagues can learn more about how to live each value and demonstrate the behaviours in their day-to-day roles.

Our new values and behaviours were also central to our Primark Connect event in Dublin in January 2024, which was attended by more than 1,700 of our global leaders, including all store managers.

We're now integrating these values and behaviours at every stage of our colleague lifecycle, from recruitment and onboarding to learning and development, to performance management. We'll track how well we implement them through our twice-yearly 'Your Voice' colleague engagement surveys and other metrics, such as retention figures.

## CARING

We always strive to put people first

## DYNAMIC

We bravely push the boundaries to stay ahead

## TOGETHER

We learn more, laugh more and achieve more as a team



“My team is responsible for supporting managers and leaders across Primark to have a positive impact on people and our business. Managers play a key role in a colleague's experience of working at Primark so we continue to invest in development for managers at all levels. This year, over 2,500 people managers attended a leadership development programme. My team also exists to help create great cultures across Primark, cultures that embody our values and behaviours and that really help to bring the best out of people.”

Adam Streeter,  
Head of Leadership and Culture



## Engaging and connecting our colleagues

### Listening to our colleagues

Fostering an engaged workforce is about enabling conversations and providing opportunities for colleagues to voice their opinions, share ideas and contribute to decisions and strategies. Through our twice-yearly colleague engagement survey, Your Voice, colleagues can share insights and feedback on a wide range of topics, including diversity & inclusion and sustainability.

We use insights from the survey to make positive changes to the colleague experience, often by adapting policies and strategies that matter to them. For example, in January, we eliminated all single-use paper cups in our head offices in the UK and Republic of Ireland in response to feedback from this survey.



We also know that our colleagues have creative ideas that can positively impact the colleague and customer experience, and even shape the future of our business and the decisions we make. We're working to unlock this potential through our FWD THINK initiative, which allows colleagues to share ideas on topics such as cost-efficiency, and how we can create more inclusive products and in-store experiences for customers. The most creative and viable ideas are then implemented.

Our colleague app, ZING, currently connects over 26,896 colleagues across our office, markets and stores, and the platform is still growing. ZING is one of our most powerful communication tools and the greatest source of news and knowledge sharing from around the business. For updates on specific topics, there are dedicated channels on ZING. For example, in March, we launched the Cares Club, a space on ZING for colleagues to learn and share content and updates about ethics and sustainability, ask questions and start conversations about this really important topic.

#### Your Voice colleague survey March 2024

# 80%

of our global workforce participated

# 452,000

comments received

### Primark Cares Day: France and Belgium

A shared vision begins with a shared understanding. Bringing together 100 colleagues from across France and Belgium, we held sessions to help our retail colleagues accelerate our Primark Cares strategy. The day was an opportunity for colleagues to understand more about our programme, how they can get involved, and the individual impact they can make to drive our strategy forward. We continue to roll out similar educational days for colleagues in other countries.



## Engaging and connecting our colleagues



### Connecting our leaders

In January, more than 1,700 of our leaders from around the world, and special guest and collaborator Rita Ora, came to Dublin for our two-day Primark Connect event. Run for our people, by our people, the event brought to life our strategy, purpose, values and behaviours for all attendees. A key focus was demonstrating how sustainability and ethics are

integral to the way we work and how we want to move forward as a business. Gamification and immersive experiences brought this to life, one of which invited colleagues to follow the lifecycle of a garment, from seed to shop floor.

### Attracting and advancing talent at Primark

Our Early Careers Programme gives us an amazing opportunity to build a talent pipeline in a competitive landscape. This year, we welcomed 47 students to Primark for year-long university placements in teams ranging from Product to Brand to ETES and Sourcing. 21 students from our 2022 cohort will be joining us in permanent positions from September 2024. Our graduate recruitment strategy for the Autumn 2023 intake included attending career fairs at our partner universities and using social media campaigns, including content for TikTok for the first time. This resulted in an increase in applications by 6% year on year, with an excellent standard of applicants who have made a great impact on the business.

### Nurturing talent and wellbeing

Providing opportunities for continuous learning and growth for colleagues is a priority for us. Our colleagues stay with us for an average of 4.5 years, which is testament to our culture and the numerous career progression opportunities at Primark.

## Engaging and connecting our colleagues

### Progressing our people

Across our new stores we welcomed colleagues to the Primark family who were previously unemployed along with colleagues for whom it was their first job. This financial year, we have opened 22 new stores globally. Grow With Us is our suite of career development programmes designed to help colleagues progress through four management levels, from Retail Assistant to Store Manager. This year, these programmes were handed over to markets, kicking off with 801 participants in the Retail Assistant - Team Manager programme. This year 297 retail assistants have completed the programme, and 138 have been promoted to Team Manager.

### Developing our leaders

This year, we introduced a new globally aligned Retail Management Induction Programme for Department Manager, Assistant Manager and Store Manager roles. The programme includes a detailed week-by-week workbook, bi-weekly line manager check-ins and evaluation questionnaires. The approach means we can highlight important information and topics, such as our Primark Cares strategy, in an efficient and consistent way as soon as colleagues join our business, embedding sustainability and ethics from the outset.

### Mentoring at Primark

This year we introduced a new reciprocal mentoring programme, Diverse Minds. The programme pairs senior leaders and more junior colleagues in a co-mentoring relationship, allowing both sides to gain diverse perspectives, build connections within the business and develop a greater sense of understanding and empathy for others.

The programme pilot saw 46 colleagues from our Buying, Merchandising, People & Culture, and Retail teams invited to take part. Each pair took part in at least five co-mentoring sessions over a five-month period, covering topics such as work/life balance and career aspirations. Participants also spent a day in their co-mentor's area of work to better understand their experience. Initial feedback from those involved has been incredibly positive, with many sharing how the programme has inspired them to do things differently.

**1,981**  
promotions awarded in 2023/24

### Colleague health, safety and wellbeing

Caring is one of our core values at Primark, so prioritising our colleagues' wellbeing is of paramount importance to us. This commitment is cemented by our health and safety strategy, 'Safe Today, Safe Tomorrow', where we set out our vision and high standards along with our plans to embed them across the business.

We set central and global KPI improvement targets and objectives for health and safety. In addition to Environment, Health and Safety (EHS) audit results, this helps us drive continuous improvement in our performance.

In 2024, 192 employees experienced an on-site Lost Time Injury (LTI). This can be put down to several factors, including:

- the complexities of entering new markets and ensuring consistent health and safety practices across all locations
- new colleagues, who required additional training and support to adapt to our safety standards and procedures
- the challenge of maintaining compliance across markets due to differing legal requirements.

### Sparking wellbeing

Our colleague wellbeing programme, Spark, was created to empower colleagues to become their best selves in work and life, focusing on the three pillars of Mind, Body and Life.

To support this wellbeing agenda on the ground, we now have Wellbeing Champions in place in all stores in the UK, Ireland, Belgium and Netherlands, and aim to cover all markets in the coming year.



## Engaging and connecting our colleagues



### Employee assistance programme

Our Let's Talk employee assistance programme (EAP) gives every colleague and members of their household access to free and confidential advice to support their health and wellbeing. We want everyone at Primark to feel safe opening up when they need help. This year, we launched a rebranded Let's Talk campaign, to coincide with the introduction of a new provider of the programme in all our markets outside the UK and US. Colleagues were reminded of what the EAP covers and how to access it, resulting in a 133% increase in take-up compared with last year.

Critical in-person on-site support is also available via the EAP, and stores across a number of our markets, including Spain, Belgium, UK, ROI and Czechia, have accessed this support for colleagues.

## Diversity and Inclusion

At Primark, our vision is to be a place where everyone feels the joy of finding somewhere they belong, whether they work for us, shop with us or live in the communities that surround us.

With over 80,000 colleagues representing 176 nationalities, and ranging in age from 16 to over 65, we're working hard to make sure everyone feels represented, tackling barriers to access and creating opportunities for brighter futures.

# 47%

of senior roles filled by women in Primark

Everyone plays a part in embedding diversity and inclusion in our business. Our Head of Diversity and Inclusion and relevant business partners work across multiple markets, building on existing foundations to deliver our strategy in this space, supported by our sponsors and colleague networks. This year, we invited external experts to help us host a series of inclusion webinars, with one designed specifically for senior leaders. We also ran expert-led sessions for teams on topics such as inclusive marketing and advertising.

Our global colleague networks continue to give people a place to share their experiences and have a say in how we shape our culture. These networks are LGBTQIA+, Cultural Diversity, Life Stages & Gender, and Neurodiversity & Disability, which have over 900 collective members across 15 markets.

# 900

colleagues involved in our global colleague networks, across

# 15 markets



### Mental Health First Responders

Our Mental Health First Responders (MHFRs) are colleagues trained to spot signs of a mental health issue or emotional distress that colleagues may be experiencing. They have been trained to initiate a conversation and outline where colleagues can source appropriate help and support. Since hitting our target of training 5% of our office colleagues last year, we have rolled out the programme to most of our markets where between one and four colleagues are now trained in every store. This year, 450 colleagues were trained, bringing the total to over 630 colleagues. They will complete refresher training on the core principles of their role every two years.

## Engaging and connecting our colleagues

### Accessible Primark



We want Primark to be an inclusive and accessible place to work and shop for everyone. That means truly considering and adapting our workplaces, our product ranges and our stores to cater for the needs of people with disabilities, chronic health conditions and post-operative or age-related needs. We've partnered with Victoria Jenkins, award-winning adaptive designer and founder of [Unhidden](#), to help us accelerate our ambitions.

We also have sensory friendly shopping hours in Ireland, offer dedicated accessible till points and fitting rooms in our stores, and our marketing campaigns and imagery feature disabled talent both in front of, and behind the camera. In January 2024, we committed to going further and driving change across our business with four accessibility commitments. We're working with inclusion and accessibility specialists to inform our strategy, such as Dr. Shani Dhanda. Dr Dhanda has provided advice, guidance and training to many teams, supported at two photoshoots as Accessibility Coordinator, and helped us to design and deliver our Disability Pride Month event. After this, we developed a guide for the business on hosting inclusive events.

#### 1. Accessible Products

We're starting with the first thing we put on under our clothes. Adaptive underwear is now available at Primark's affordable prices. In the future, we will introduce more adaptive items and apply inclusive designs to more product ranges. We'll work in partnership with experts to learn and push ourselves to go further and faster, and to make a bigger impact.

We're committed to this, and we're only just getting started. In January 2024, we launched our first adaptive underwear collection designed to support those with limited mobility with easy access closures. Priced at £8 to £10, we launched the collection in selected stores, and we were awarded with the Disability Smart Inclusive Product Design award at the Business Disability Forum Awards 2024 in London. Our partnership with Victoria Jenkins will help us to expand our offering in accessible products next year.

#### 2. Accessible Stores

In our stores, we're committed to creating a more accessible environment for our customers and colleagues. To support us in achieving this, we are partnering with accessibility specialist organisation [AccessAble](#) to survey all our stores in ROI and the UK, as well as our head offices and our Slip depot. The in-store information will be published on AccessAble's website and will provide disabled customers with essential information to inform their visit to a Primark store. Accessibility information relating to our store back-of-house areas, offices and depot will be shared with our colleagues internally, benefitting new joiners and existing colleagues alike. As of the end of September 2024, 97% of UK and ROI stores have been surveyed.

#### 3. Culture of Accessibility

As part of our commitment to a culture of accessibility we worked with [Purple Tuesday](#) to conduct an audit. This work is now complete and we are building an action plan based on the findings. Purple Tuesday have also completed a full review of our Diversity and Inclusion policy, providing recommendations to make this more comprehensive.

#### 4. Inclusive Representation

At Primark, we strive to reflect the beautiful, vast diversity of our customer base through our campaign imagery, and we are proud to work with talent from the disabled community, both in front of and behind the camera. We will continue to do this. We've recently created a guide to future-proof our photography studio so when models work with talent from the disabled community, accessibility adjustments can be made in advance.

### Supporting the LGBTQIA+ community

We're a longstanding partner of ILGA World, a worldwide federation of more than 1,800 organisations campaigning for the rights of lesbian, gay, bisexual, transgender and intersex people.

This year, we also forged partnerships with several local LGBTQIA+ charities in our markets, choosing organisations that align with our values. In addition to supporting these charities through donations, we hope to tap into their expertise and resources in a way that benefits our colleagues, customers and communities.



## Engaging and connecting our colleagues

### Community impact through charity partnerships

We aim to make a positive difference in the areas where we live and work through partnerships with charities and community organisations that share our core values and vision for a positive social impact.

Our long-standing charity partners include [UNICEF](#), [Breast Cancer Now \(UK\)](#) and the [Irish Cancer Society](#). Over the years we have also built partnerships with local charities and organisations across our markets, including Lebenshilfe in Austria, Fundación ONCE in Spain, UWV in the Netherlands, Fondazione Adecco in Italy and Les Restos Du Coeur in France.

Each year, we donate the proceeds of our bag levy in multiple markets to selected charity partners. This financial year, we reached an important milestone of raising £1 million for our Scottish and Welsh partners, [Children's Hospices Across Scotland \(CHAS\)](#) and [Noah's Ark](#).

We donated over

# £3m

to our charitable partners in 2023/24

# £1m

of this was raised through customer fundraising campaigns.

### Boosting social inclusion

Over the past year, we've been looking at ways to help tackle barriers and promote a culture of inclusion both within and beyond our offices, depots and stores.

This was the first year of our new three-year partnership with [WorkEqual](#), which supports people in entering or returning to the workplace. The Dublin-based social enterprise specialises in removing barriers to work through targeted services and support such as image styling, interview preparation, job applications and confidence-building.

#### How we support good causes

- Corporate financial and product donations
- Customer in-store fundraising campaigns
- Practical support and colleague volunteering

On International Women's Day, we co-hosted a confidence-building event at our Dublin headquarters for a group of early school leavers preparing to take their first steps on their career journeys. In March, we also co-hosted a similar event in Cork, southern Ireland, as part of our €300,000-backed commitment to help WorkEqual expand its services across Ireland over the coming years.



### Sharing ways to wear, care and repair

Connecting our sustainability ambitions to charity partnerships is an exciting new step for Primark. We joined forces with French charity Chaussettes Solidaires this spring to run dozens of free sewing workshops showing people how to repair and upcycle old clothes.

More than 750 free places were offered to customers and colleagues. 36 'Aimer pour Durer' (Love it for Longer) sessions were held outside our stores in nine shopping malls across France. We invited participants to bring their old clothes to work on or they could have one of our tote bags to customise using scraps of fabric provided. The workshop instructors were graduates of a sewing course run by Chaussettes Solidaires for vulnerable, unemployed or disabled people.

Read more about our [repair programmes](#).

# Partnerships and stakeholder engagement

## Engaging with key external stakeholders

We often 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 - membership groups, charity organisations, local and international NGOs, and unilateral and multi-stakeholder initiatives.

We follow the guidance of the UNGPs and the [OECD Due Diligence Guidance for Responsible Business Conduct](#). We also actively participate in multi-stakeholder and industry initiatives at a national and international level. We're signatories to major industry initiatives that give guidance and support in this area.

## The shifting legislative environment

Engagement with policymakers is important with increased regulation, and impending changes to local legislation in our sourcing markets. The volume of legislation will require changes to our processes and systems and evolve how we and our suppliers source and make products, as well as how our products are used and disposed of when they leave our stores. We welcome these changes and we're adapting to meet them as necessary.

New legislation will also require greater transparency within the fashion industry, which will require the entire industry to adapt and evolve. It's vital that new legislation across the EU is aligned, to allow it to be more effective in raising standards and creating a level playing field for all. If done well, harmonised regulation should simplify compliance for retailers and provide opportunities for our business and the industry. We remain committed to the delivery of Primark Cares under this changing landscape.






## Partnerships and stakeholder engagement

Stakeholder	Their expectations	How we engage
 <b>Charities, NGOs and civil society</b>	Transparency and a commitment to addressing social and environmental challenges through responsible business practices.	Collaboration with charities, NGOs, and civil society organisations to support accessibility, sustainability and community impact projects, engage in open dialogue, and address risks within our supply chain.
 <b>Colleagues</b>	A fair, safe, and inclusive work environment with opportunities for growth and development.	Regular communication, colleague feedback initiatives (Your Voice Survey), internal training and development opportunities.
 <b>Customers</b>	Affordable, quality and durable products produced ethically and more sustainably.	Providing transparent information on our sustainability efforts, offering more sustainably sourced products, and encouraging dialogue through customer service channels, media and social media.
 <b>Government and regulators</b>	Compliance with legal requirements and ethical standards, particularly regarding labour rights and environmental impact.	Maintaining ongoing dialogue with government bodies and regulators, ensuring compliance with legal requirements and collaborating on policies that promote sustainability and ethical trade.
 <b>Industry and Trade Associations</b>	Active participation in collective initiatives and adherence to industry standards that drive responsible business practices.	Active participation in industry forums and collaborations, contributing to shared initiatives aimed at improving sustainability standards across the sector.
 <b>Industry partners</b>	Collaboration, adherence to shared ethical standards, and a focus on innovation and sustainability within the supply chain.	Collaborations that align with our Primark Cares strategy and ETES programme, sharing best practices and working together to achieve common goals.
 <b>Investors</b>	Sustainable growth, profitability, and transparent reporting on environmental, social, and governance (ESG) performance.	Through regular reporting on our ESG performance, providing updates on sustainability initiatives and fostering transparent communication.
 <b>Media and key opinion leaders</b>	Clear, transparent communication on our sustainability initiatives and responsiveness to societal issues.	Transparent and timely updates to media and key opinion leaders on our sustainability efforts, responding to inquiries and sharing our progress on ethical initiatives.
 <b>Suppliers and workers</b>	Ethical trade terms, timely payments, and a commitment to decent and fair sourcing and labour conditions.	Through direct partnerships, responsible sourcing programmes, audits, and capacity-building and social impact initiatives that improve labour conditions and promote ethical practices.
 <b>Trade Unions</b>	Open dialogue and collaboration to protect workers' rights, ensure fair wages, and improve working conditions.	Through ongoing dialogue and collaboration to ensure workers' rights are upheld, working together on initiatives that improve workplace conditions both within our sourcing and our operating markets.





# Improving livelihoods

Our Primark Cares commitments in the People pillar support our human rights due diligence (HRDD) activities and aim to make a positive difference for the hundreds of thousands of workers in our supply chain. As outlined earlier, our [Supplier Code of Conduct](#) and [Supply Chain Human Rights Policy](#) set out the conditions that all our suppliers must follow. We run social impact programmes in many of our sourcing markets and continue to evolve our practices to promote a resilient supply chain with safe and decent workplaces.

## People commitments

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

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

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



We hosted our first event in Bangladesh to bring together suppliers with physical and mental health providers.



**32 factories** participating in our wage data collection pilot project in Bangladesh, Cambodia, India, and Türkiye.



We evolved our My Space programme to include education for workers on physical health.

# Creating financial resilience

## Pursuing a living wage for people in our supply chain

Our commitment is to pursue a living wage<sup>1</sup> for workers in our supply chain. To do this, we are focusing on the following:

- **Industry collaboration:** This is key to our approach. We're a founding member of [Action, Collaboration, Transformation \(ACT\)](#), an agreement between 20 global brands and [IndustriALL Global Union](#) in pursuit of living wages for workers in textile and garment supply chains. We continue to take part in discussions through the Ethical Trade Initiative's (ETI) Learning and Implementation Community (LIC) to share our learnings from putting in place responsible purchasing practices.
- **Embedding responsible purchasing practices** within our business: This is an important part of creating the right working conditions for improved worker wages. We use [ACT's Accountability and Monitoring Framework](#) to measure our progress. Our progress on this can be found on the next page.
- **Transparency on wage data:** As our social audits determine whether legally required wages and benefits are being paid, we're exploring more effective ways to gather accurate information so that we can better understand the overall wage gap to a living wage and incentivise suppliers to make progress in this space. This year, we piloted the Fair Labor Association (FLA) Wage Tool to collect wage data in a range of factories in Bangladesh, Cambodia, India, and Türkiye. Thirty two factories are participating in the project. Information from the pilot will be used to compare actual wages paid against the living wage benchmark of the [Global Living Wage Coalition](#).



1. A living wage must provide a decent standard of living for a worker and their family, taking into account the cost of food, housing, essential needs and unexpected events. We follow the Global Living Wage Coalition's (GLWC) definition of the living wage.

## Creating financial resilience



### Embedding responsible purchasing practices

Responsible purchasing practices are the strategies we implement and decisions we make when we engage with suppliers and purchase goods. They are a key element of improving wage conditions for workers in our supply chain. We're focused on improving our purchasing practices in the following areas, in line with [ACT principles](#):

#### 1. Upskilling and awareness training

We continue to build understanding and awareness among our colleagues on the importance of responsible purchasing practices in their product decisions. Starting from Autumn 2023, we trained 1,253 colleagues across our business on various modules relating to responsible purchasing practices.

#### 2. Wages as itemised costs

Identifying and ringfencing the labour cost of a product will help protect workers' wages from price negotiations. We've set up a working group, comprising some of our key suppliers and teams from our sourcing markets, to develop a tool to identify labour costs. We provided training to 320 suppliers and 455 colleagues on this and will continue to embed this in our business moving forward.

#### 3. Fair terms of payment

We continue to offer our Goods for Resale suppliers 30-day standard payment terms. This year, all orders for 93% of Goods for Resale suppliers were paid within the agreed time frame. We also set up a cross-company working group to develop a more collaborative approach to drive further improvement.

#### 4. Better forecasting and planning

By establishing more long-term planning for core products, we can support our suppliers in managing their production cycles and budgets. We're piloting a solution to inform and improve forecasting for all product areas.

#### 5. Responsible exit strategies

If we need to stop working with a factory or supplier, we continue to follow our Supply Chain Human Rights Policy and the [ACT Responsible Exit Policy and Checklist](#), honouring any existing orders. This process was followed when we decided to stop sourcing from Myanmar in 2022; where our last orders were shipped from in October 2023. The Ethical Trading Initiative (ETI) highlighted our approach to this exit as an example of good practice in its [report on human rights due diligence in challenging contexts](#), published in May 2024.

## Creating financial resilience



### Pursuing a living wage for workers in Cambodia

In May, Primark signed a legally binding agreement with the [IndustriALL global union](#) to support collective bargaining for garment workers' wages in Cambodia. IndustriALL is a global federation of unions representing 50 million workers in 140 countries. With the support of ACT, a number of brands also signed individual agreements with the global union.

The agreement commits Primark to supporting any of our approved factories in Cambodia who sign the collective bargaining agreement between local unions and [TAFTAC](#)<sup>1</sup>. This is an important step towards achieving living wages in the longer term. Read more [here](#).

### Strengthening the financial literacy of people in our supply chain

We know that workers who can read their payslips, manage their money, and access social security are less vulnerable, resulting in a more stable and resilient supply chain. That's why we invest in financial literacy programmes that help workers build their financial understanding and access the benefits to which they are entitled.

During the year, we implemented five initiatives supporting access to social protection and financial education and services in 28 factories across four countries.<sup>2</sup>

#### Financial resilience programmes in key sourcing markets

<b>Haqdarshak</b>	India	<a href="#">Haqdarshak</a> is an initiative complementing Securing Futures in India. It provides a technology solution to help workers access government welfare schemes beyond social security. We are now in 8 factories as of July 2024. <sup>2</sup>
<b>Bright Futures</b>	Vietnam	We are working with the <a href="#">Standard Chartered Foundation</a> and <a href="#">IDEO.com</a> to develop a model for improving workers' financial literacy. Booklets, training, and mentoring support materials have been created and are ready to pilot in factories.
<b>Responsible Wage Digitisation</b>	Cambodia	Responsible Wage Digitisation is an initiative with the ILO's <a href="#">Better Work</a> in Cambodia designed to support wage digitalisation. <a href="#">The German Agency for International Cooperation (GIZ)</a> -funded programme is currently supporting 7 factories in our supply chain to transition to digital wage distribution, moving away from cash. <sup>2</sup>

1. TAFTAC is the Textile, Apparel, Footwear and Travel Goods Association in Cambodia.

2. Data from Global Sourcing Map up until 31 July 2024. It is updated annually and was last updated in November 2024: <https://globalsourcingmap.primark.com/>

## Creating financial resilience

### Helping workers in India access benefits

Our **Securing Futures** programme was developed by our team in India to help workers take advantage of social insurance provided by the state.

The project nominates workers to become 'nanbans', meaning 'friend' in the local language, Tamil. They are trained on the benefits of and requirements for accessing the Indian government's Provident Fund and reach out to the wider workforce to share what they've learned to support colleagues in completing the complex registration process for obtaining benefits.

Early findings and feedback shows that workers are not only gaining awareness of what they are entitled to, but translating this into increased access to social security.



### Supporting vulnerable migrant workers

Many of our supplier factories in India are concentrated in areas where poorer and less-educated people move to for work. Since 2017, we have run the My Life programme in India in partnership with the international NGO **Women Win** and **Naz Foundation**. This initiative has been designed to address the risks that vulnerable people face, particularly domestic migrant workers and women in factories in our finished goods supply chain.

The initiative equips workers with essential life skills in three key areas: communication skills, knowledge of worker rights and workplace health practices.

This year, our partner **60 Decibels** published a [report](#) on My Life. The findings revealed that the programme has positively impacted workers' communication skills and has provided workers with a better understanding of their rights and responsibilities. For example, 95% of respondents stated that their communications skills had either 'very much improved' or 'slightly improved'.

When disaggregating the results between migrant workers and non-migrant workers, the results show bigger improvements for migrant workers. For example, 70% of migrant workers reported their communications skills had 'very much improved' compared to 50% of non-migrant workers. This trend is replicated across various criteria underscoring the initiative's success in addressing the needs of the most vulnerable workers.

# Promoting equal opportunities for women

Our experience shows us that some systemic barriers around gender equality exist in some of our sourcing countries. These include a lack of training among female garment workers which may mean they do not have the technical or managerial skills to progress. Women predominantly carry the burden of unpaid care, leaving less time to work and balance their wellbeing. Social norms in some countries also mean women are discriminated against because of the work they do. Some may also have difficulties accessing equal pay and being respected at work.

To help address these barriers, we're working to change perceptions of women in the workplace in our sourcing countries. With the help of our partnerships, we're engaging with women and men in our supply chain through training, knowledge sharing and open conversations. One example is our My Life programme, which helps vulnerable migrant workers understand their rights, with a strong focus on women.



## Skills development among women factory workers

Many women feel unable to progress in their careers because they lack the necessary skills. We're working to empower women to take on more responsibility, grow their earning potential and become leaders who uplift others. Through partnerships and close collaboration with suppliers, we offer a range of training to improve both women's technical skills, such as sewing, and soft skills like problem-solving and communication. It's also our aim that factory managers can see the business benefits of upskilling women.

During the year, we implemented two initiatives supporting skills development in our finished goods supply chain across 35 factories.<sup>2</sup>

Sudokkho also supports the promotion and training of female supervisors. One successful trainee observed:

**"I feel empowered after becoming a supervisor. After 13 years in this industry, Sudokkho has given me the chance to progress in my career. I aspire to advance to a senior position like Production Manager."**

**Sudokkho trainee**  
Trained female supervisor

## Supporting women leaders in garment factories

In Bangladesh, we have expanded our skills development programme, Sudokkho<sup>1</sup>, which helps factories create effective technical training for sewing operators, most of whom are women. Sudokkho now covers 28 factories in the country.<sup>2</sup>

Several factories that have completed the programme with us have continued to use the Sudokkho model, with many keeping a dedicated training line and trainers. Since the launch of the programme, one factory in a remote area added two production lines with the help of Sudokkho, by upskilling workers without increasing the workforce.



1. Read more here: [The Primark Sustainability and Ethics Report 2022/23](#), page 42.

2. Data from our Global Sourcing Map up until 31 July 2024. It is updated annually and was last updated in November 2024: <https://globalsourcingmap.primark.com/>

## Promoting equal opportunities for women



### Deepening our understanding of gender inequity in garment factories

Gender inequity is not just a women's issue, but a societal issue. If we are to foster safer, more inclusive workplaces for women in the garment industry, we need to know what gender-based beliefs are held by their male managers and supervisors, and engage these colleagues as allies.

We worked with the [International Center for Research on Women](#) (ICRW) to explore gender norms held by male managers at four Indian factories in our supply chain. The study involved one-on-one interviews and focus group discussions with male managers on their attitudes towards women as co-workers, gender division of labour, gender-based violence and harassment (GBVH), and the creation of gender-equitable workplaces.

Drawing from the research findings, published this year, the ICRW has now developed a step-by-step [conversation guide](#) to engage male managers in meaningful conversations to help reduce stereotyping and create a more gender-inclusive workplace. This guide will help us work with partners to design programmes that engage male managers on promoting gender equity.

### Tackling gender-based violence in our supply chain

Gender-based violence and harassment (GBVH) in the workplace is often driven by complex social norms as well as a lack of awareness, systems and resources. We partner with technical experts on the ground and take a systematic approach to preventing and addressing the root causes of GBVH. These include inappropriate behaviour and attitudes, limited understanding of what constitutes harassment, lack of senior level commitment to address the issue, and inadequate workplace mechanisms through which workers can safely and effectively raise grievances related to GBVH.

During the year, we had three initiatives supporting efforts to address GBVH in 28 factories across three countries.<sup>1</sup>

#### The Maitri initiative in India

This was the first full year of our Maitri programme in India, which seeks to prevent and address GBVH in the workplace through peer-based interventions. The programme was developed by our team in India and [St Johns Medical College](#), and was implemented in six factories in the last year. Trained 'maitris' – meaning 'friends' in Sanskrit – provide support to women workers, and trained gender champions act as workplace change-makers promoting dignity and respect for all. Early reporting to St Johns has indicated that workers at three factories have raised workplace and domestic GBVH issues to the 'maitris'. These issues are being worked on through internal factory management systems followed up with support by Primark and St. Johns.

### Improving awareness and understanding of GBVH in Vietnam

This year, two programmes in Vietnam focused on providing factories with the processes and skills to address and prevent GBVH.

[Drama for Change](#), is run in partnership with the [Atelier Théâtre et Art \(ATH\)](#). We have been working with them to host improvisation theatre workshops in 11 factories over the last three years to engage workers on GBVH issues. We used these interactive sessions to spark conversations and help workers and management break down stereotypes together, building trust so that people feel more comfortable about reporting GBVH through grievance mechanisms. Through the workshops, the suppliers noted greater worker awareness and trust, improved skills and confidence among those handling grievances and stronger policies and procedures.

Respectful Workplaces is run in partnership with the [International Finance Corporation](#). Through this programme, we have rolled out training in 14 factories to build capacity and skills for preventing and addressing GBVH in the workplace.

### Supporting workers through effective and accessible grievance mechanisms

When they work properly, grievance mechanisms give people a way to safely raise problems they are experiencing at work without retaliation. These mechanisms are required as part of our Supplier Code of Conduct, and so play a central role in doing business with us.

[Read about our approach to grievance mechanisms.](#)

1. Data from Global Sourcing Map up until 31 July 2024. It is updated annually and was last updated in November 2024: <https://globalsourcingmap.primark.com/>

# Improving health and wellbeing

We work hard to protect the health and safety of workers in our supply chain. We require suppliers to provide a safe and hygienic working environment with access to adequate medical assistance in the event of illness or injury at work. All workers must receive regular and recorded health and safety training.

We also work with suppliers to raise and maintain health and safety standards in the workplace through various initiatives.

## Physical and mental health initiatives in our sourcing markets

During the year, we had five initiatives supporting improvements to workers physical and mental health and wellbeing across 127 participating factories.<sup>1</sup>

In China, the EHS Now! programme trains managers in environmental health and safety (EHS) topics such as chemical safety and personal protective equipment, so they can train others. A new EHS KPI Dashboard also helps factories to keep track of health and safety initiatives within the factory. This project is running in 90 finished goods supply chain factories in China.<sup>2</sup>

Following the devastating earthquakes in Türkiye in February 2023, we identified disaster preparedness as a priority for workers and factories in the region. In partnership with a local NGO AKUT, we ran a pilot helping five factories in Türkiye identify areas for improvement in their disaster preparedness responses and processes. AKUT then guided the factories on ways to enhance their emergency risk assessments and emergency action plans, before rolling out disaster preparedness training. We will use our learnings to develop a toolkit that we can roll out elsewhere in our supply chain.

In Bangladesh, we continue to support the pilot Employment Injury Scheme for workers in partnership with the ILO, GIZ and Bangladesh Government. The scheme compensates injured workers and dependents for accidents that lead to permanent disability or death. In July 2024, the injury scheme was expanded to cover accidents that may occur when workers are commuting to work.

As well as making sure that workplaces are safe, we also believe employers can do more to help workers to access health and wellbeing services. We're working with suppliers to create better support systems that reduce stress and enable people to reach out for help.

## Health Mela in Bangladesh

In March 2024, we hosted the first-ever Health Mela (fair) for suppliers and factory managers in Bangladesh. It acted as a marketplace for suppliers to meet 19 organisations offering workers a wide range of physical and mental health services, including telemedicine, menstrual care, mental health support, and training programmes. Our aim was to empower suppliers to forge partnerships with organisations that aligned with the needs and priorities of their management and workers.

Over 200 participants visited the day-long Mela, including some of our supply chain partners, along with different stakeholders, such as representatives from the Bangladesh Garment Manufacturers and Exporters Association (BGMEA) and UNICEF. Two new partnerships between suppliers and providers were subsequently established, and our Bangladesh team is supporting conversations for other potential partnerships.



1. Data from our Global Sourcing Map up until 31 July 2024. It is updated annually and was last updated in November 2024: <https://globalsourcingmap.primark.com/>  
 2. As of August 2024.



## Improving health and wellbeing

### Promoting good mental health in our supply chain

One challenge in improving health and wellbeing is overcoming negative stigmas around mental health and wellbeing, which prevent people from speaking up and getting help. Women are particularly impacted by drivers of poor mental health, including unpaid care work, family matters, sexual harassment and gender-based discrimination. We believe suppliers can play a valuable role in opening up discussions and empowering people to prioritise their wellbeing.



### My Space, India

Our [My Space](#) programme in India has become a leading example of how workplaces can change attitudes and behaviours around mental health. The programme trains selected staff to become lay counsellors who support colleagues experiencing poor mental health or stress. In the long term, improved dialogue and understanding of mental health can reduce the stigma. We run the programme in partnership with [St John's Medical College](#), India.

This year, My Space evolved to deepen its impact. The curriculum expanded to cover physical health, including menstrual hygiene, ergonomics, nutrition, sleep and diabetes. It was also condensed into a four-day training session, which makes it easier to implement, and was adapted to overcome language barriers, helping migrant workers to benefit from the programme.



My Space has been celebrated for its success globally. To encourage others in adopting similar programmes, the programme was used as an example of best practice by St John's at the [International Congress on Occupational Health held in Marrakech, Morocco](#). The programme was well received, with attendees noting that it was a robust programme to support employees and reduce the mental health knowledge gap. Many also said that having an international brand support the programme sets an example for other businesses to invest in mental health. St John's Medical College received a fellowship to present a paper and case studies, which included My Space, at the World Congress on Safety and Health at Work, in Sydney, Australia in November 2023. Similarly, we have presented My Space alongside the [Tirupur Exporters Association](#), raising awareness of the benefits a programme like this delivers to businesses and workers.

## Improving health and wellbeing

### Moner Kotha, Bangladesh

Using learnings from the successful My Space project, Moner Kotha ('mind talk' in Bengali), was set up in 2022 across four factories in Bangladesh. It aims to raise awareness of mental health issues, share self-coping mechanisms and build people's understanding of supportive services. It is run in partnership with the [British Asian Trust](#) and [Sajida Foundation](#).

The programme has delivered the first round of mental health and wellbeing awareness sessions to 2,500 workers. This year, we continued to roll out refresher training for para counsellors, focusing on building their skills in delivering counselling in a factory. Our partner, the Sajida Foundation, reported that around 350 counselling sessions have taken place.

The British Asian Trust reviewed learning to date from Moner Kotha. They found that it is important to have a range of para counsellors to support diverse needs and problems. People tend to select a counsellor based on the challenge they are facing, and both peers and managers are needed to support different issues. We will use these learnings as we scale the programme.

**"In the factory I've become a familiar face, known to both management and workers for my role as a para counsellor. It fills me with pride to support my colleagues during their toughest moments, guiding them through their mental health challenges. My ability to navigate and resolve issues has earned the trust of my family, who now look to me for guidance. This programme has not only transformed my professional life but has also brought about significant changes in my personal sphere."**

Para counsellor participating in Moner Kotha initiative



## Improving access to eye care

Globally, over one billion people could see clearly if they had glasses. To help workers across our supply chain improve their vision, we've partnered with global social enterprise [VisionSpring](#) in India, Bangladesh and Vietnam.

This new project will involve setting up pop-up stations to test every worker's vision and provide glasses when needed. Some workers may be unaware of their vision problems, so testing everyone will make sure no issues go undetected. Glasses are provided on the day if a screening result shows they are needed. Additionally, selected factory employees will also be trained as 'Vision Champions' to encourage workers to wear their glasses.

Through our support, VisionSpring visited nine factories across India, Bangladesh and Vietnam, and conducted screenings testing the vision of 3,673 workers. Early results show that 1,854 of these workers required glasses of which 89% were first time wearers. VisionSpring will continue to conduct screenings and provide glasses as needed.

In Bangladesh, three suppliers have agreed to share the costs of the project with us. Their contribution reflects their commitment to their workers' health and their understanding of the importance of this to their business.



# Giving clothes a longer life

The fashion industry is changing, as are customer expectations, so the way we design and make our clothes is also evolving. We want customers to get more out of their clothes and to love them for longer. Our three Product commitments aim to address different stages of the product life cycle to help us become a more sustainable and circular business.

## Product commitments

**Clothes made from recycled fibres:** all our clothes will be made from recycled or more sustainably sourced materials by 2030.

**Affordable clothes designed to last:** we will strengthen the durability of our clothes by 2025.

**Clothes that can be recycled:** our clothes will be recyclable by design by 2027.



57% $\Delta$

of the cotton clothes contained cotton that is organic, recycled or from our Primark Cotton Project, up from 46% in 2023.



66% $\Delta$

of our clothing units sold contained recycled or more sustainably sourced materials, up from 55% in 2023.



We launched a partnership with WRAP to explore solutions to better manage textile waste.

# Increasing recycled or more sustainably sourced fibres in our clothes

66% $\Delta$  of our clothing units sold this year contained recycled or more sustainably sourced materials, up from 55% in 2023. This has given us the confidence to decide that the Primark Cares label will no longer be needed on our clothes. Over the next 18 months, the Primark Cares logo will be phased out from product labels, our website product pages and store artwork and will be replaced by the Primark logo. Our minimum requirements for use of these fibres in our clothing will remain and our products will still be clearly labelled to meet customer expectations around sustainability.

We continue to accelerate our training programme for suppliers and internal product teams on our recycled or more sustainably sourced minimum fibre content protocols. In 2023/24, we trained 309 of our suppliers and 231 buyers across our business, with mandatory protocol training introduced for all new starters in the product teams.

There is still no industry minimum recycled content standard that covers all material types. Our minimum fibre content protocols vary by material type and have been set, where relevant, to align with industry recognised standards such as the [Organic Content Standard \(OCS\)](#), [Global Organic Textile Standard \(GOTS\)](#), [Recycled Claim Standard \(RCS\)](#) and [Global Recycled Standard \(GRS\)](#).

We are members of [Textile Exchange](#) and use its preferred materials matrix to guide our decision-making for our recycled or more sustainably sourced minimum fibre content protocols.

Sustainability claims are complex and can be confusing for customers. We believe it's our role to educate customers about the fibres in our products so they can make informed decisions about the products they buy. That's why we have an [online glossary](#) where you can learn about the fibres we use in our clothing and the terms we use when talking about our sustainability strategy.

All products containing recycled or more sustainably sourced materials are clearly identifiable with minimum fibre content claims included on each individual product label. For example, where recycled polyester is used within a product, the label will clearly state that it was made using a minimum of 50% recycled polyester. Our [online glossary](#) also defines what we mean by a recycled or a more sustainably sourced materials and is in line with the [Textile Exchange Preferred Fibre Matrix \(PFM\)](#).

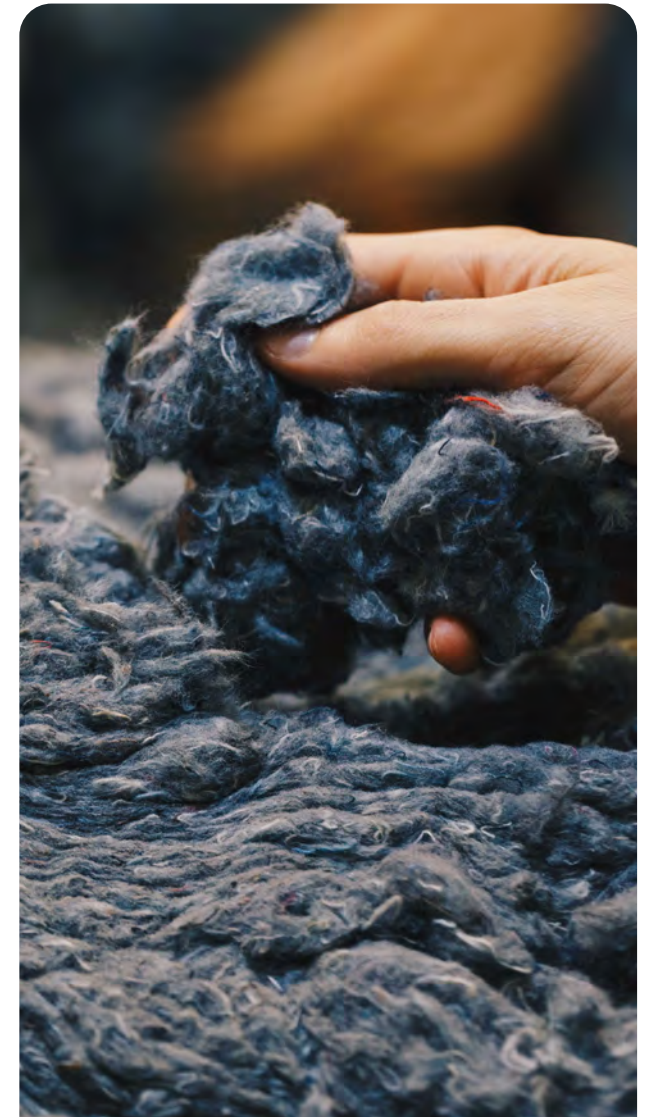
## Scaling our use of recycled cotton

Recycled cotton is one of the fibres we want to use more of in our products. Since 2020, we have been working with [Recover™](#) to incorporate more of its low-impact, high-quality recycled cotton fibre and cotton fibre blends in our products. Every year, this partnership grows stronger. We have significantly increased the use of Recover™ fibres through our Pakistan and Bangladesh supply chain, scaling our use of its RCotton range across our jersey and denim products.

We continue to work with Recover™ to look for more ways to expand its fibres through our product ranges to help meet our targets.

## Responsible sourcing of man-made cellulosic fibres and synthetic materials

We use wood pulp for a range of fibres like viscose and lyocell, known as manmade cellulosic fibres (MMCFs). Our [Wood and Wood-Derived Fibre Policy](#) sets out our approach to responsibly sourcing these materials. Since 2022, we have been a partner of [Canopy](#), a global non-profit organisation dedicated to protecting the world's forests. Alongside other fashion brands, we are signatories to the CanopyStyle initiative to transform fashion supply to move away from using resources from ancient and endangered forests.



## Increasing recycled or more sustainably sourced fibres in our clothes

All suppliers that use MMCFs are required to only use producers that are green rated by [Canopy's Hot Button ranking](#). Our Traceability team has added MMCFs to the TrusTrace platform, allowing us to better map our use of it.

## Traceability of the fibres in our products

Traceability is an important part of making sure the fibres used in our products meet our standards and, since 2022, we have been rolling out our Traceability programme. We have partnered with market-leading platform [TrusTrace](#) and are using its software to map our products' supply chain, from raw material to finished product.

We started with cotton-based products, as it is our most used fibre. We have since expanded the programme to include more suppliers, fibres and products. This year, our programme reached 100 suppliers and we increased the number of raw materials mapped to the four main materials Primark uses: cotton, polyester, nylon and MMCFs such as viscose.

As part of the phased rollout of our Traceability programme this year, we began automating traceability information with 11 of our suppliers. The new system links live orders to their mapped supply chains, allowing us to track each tier involved in producing a specific product. It means every time we raise an order, the supplier is automatically asked to declare the supply chain of the product provided. All supply chain data is collated on a live dashboard, giving us real-time visibility. The TrusTrace platform also helps us prepare for upcoming regulatory requirements, such as the Digital Product Passport scheme that forms part of the EU's Ecodesign for Sustainable Products Regulation (ESPR).

We continue to train suppliers regularly on our traceability expectations and have governance in place to uphold these standards. Additionally, our local teams monitor for the presence of forced labour in our sourcing markets.

## Traceability in our Primark Cotton Project

57% $\Delta$  of the cotton clothing units sold contained cotton that was organic, recycled or sourced from the Primark Cotton Project (formerly the Primark Sustainable Cotton Programme) our unique training programme for cotton farmers in our supply chain.

The Primark Sustainable Cotton Programme was renamed to the Primark Cotton Project in 2024 to align with the latest regulations and guidance on environmental claims. However, nothing about the programme itself has changed. We continue to train and support cotton farmers in agricultural methods which aim to increase the amount of cotton grown, reduce their input costs and therefore boost farmers profits. In line with our commitment to drive the uptake of more regenerative farming within the Primark Cotton Project by 2030, we continue to train farmers in how to reduce their use of chemical pesticides and fertilisers to grow cotton.

We have built traceability into the programme to help identify the origin of our cotton and to help us meet growing legislative requirements around fibre transparency.



We use [CottonConnect's](#) digital traceability platform, [TraceBale](#), to track the cotton from farmers in the Primark Cotton Project as it passes through our supply chain, from ginner to spinners. To give us greater assurance, we partnered with [Qritain](#), a specialist verification firm which uses forensic science techniques to confirm the cotton's source.

Read about the Primark Cotton Project [here](#).

Number of farmers trained in the Primark Cotton Project<sup>1</sup>:

**309,394 $\Delta$**



1. Farmers who have both enrolled and begun a three-year training programme are considered for the metric reporting. The number reported may include some farmers that have left the programme before full completion. As at 31 July 2024, 11,144 farmers were known to have permanently left the programme. Refer to our [Basis of Reporting](#) for further information.

# Our new Durability Framework

## We're committed to extending the lifespan of our clothing.

We define durability as the amount of wear or use that a customer can get from an item of clothing over a period of time. Clothing is durable if it remains functional and wearable without requiring too much maintenance or repair when faced with the challenges of normal wash and wear over its lifetime.

Despite the EU's focus on product durability, and the impact of waste on the environment, there is currently no agreed industry or legal standard for physical durability.

This year we published the Primark Durability Framework (Framework). It includes physical quality tests linked to a set number of washes across four levels, these are set out below. These levels range from 5 to 45 washes, and are categorised as minimum compliance, foundational, progressive, and aspirational.

Framework level	Extended washing intervals <sup>1</sup>
Minimum compliance	5
Foundational	23
Progressive	32
Aspirational	45

We set an aspirational level of 45 washes for eligible clothes<sup>2</sup> after consulting with WRAP on its latest data on the average number of washes for an item's target lifetime, and taking an average of the number of washes for all clothing categories from the [WRAP Longevity Protocol](#).

Since January 2024, eligible clothing has been tested to the aspirational level. The Framework exists to give clear guidance to our product teams and suppliers when considering the material, design, and manufacture of our clothing.

We have now collected a full year's durability data for denim, socks and jersey. This will enable us to build a full product performance baseline and to truly understand how each product category is performing on durability. Our ambition is to continue to demonstrate to our customers that there is no need for the industry to charge higher prices for clothes that are made to last, building on our research with the University of Leeds and [Hubbub](#) published last year.

Since January, 66% of clothing across socks, denim and jersey that were tested passed the aspirational level of 45 washes.

The table below outlines the % of socks, denim and jersey that was tested which passed our aspirational level of 45 washes.

	% that passed the aspirational level of 45 washes 2024
Denim	56%
Socks	68%
Jersey	67%

## Changing mindsets and standards

We created the Primark Durability Framework to give our consumers greater confidence that low prices don't come at the expense of durability. One of our aims with the Framework is to make it easier for our suppliers and testing houses to identify, understand and implement areas for improvement.

Now that we have rolled out the Framework across our business, we're collaborating with internal and external stakeholders to understand how we can continuously improve and evolve our approach.

We're excited to partner with Primark in strengthening the durability of its clothes. The aspirational targets they have set are truly stretching, with extended 45 wash testing that is way beyond the industry average. Because of the leap this testing requirement represents, it was initially a challenge to align everyone (including, for example, fabric mills, component and trim suppliers, and dyestuff producers). However, we have been pleasantly surprised by how many clothes we produce that already meet foundational and progressive targets. The next stage is to partner on a 'continuous improvement' programme to analyse and close the gap to the aspirational targets. This starts with the design and development decisions we make in partnership with the Primark and includes working with all our different supply chain partners on the detailed technical changes required."



Glen George  
Director, Padma Design Ltd., Primark supplier

PADMA

1. Extended washing intervals is the number of times a clothing item can be washed to maintain its durability.
2. There are currently some clothing exemptions within the Primark Durability Framework. These include anything that needs handwashing or dry cleaning.

# Love it for Longer repair workshops

## Scaling our repair programme

We're educating our customers on how to care for, repair and upcycle their clothing. We run free repair workshops<sup>1</sup> in many of our stores, which aim to inspire people to mend, darn, embroider, customise, and upcycle their clothing. We also offer [online tutorials](#) for those who cannot attend in person.



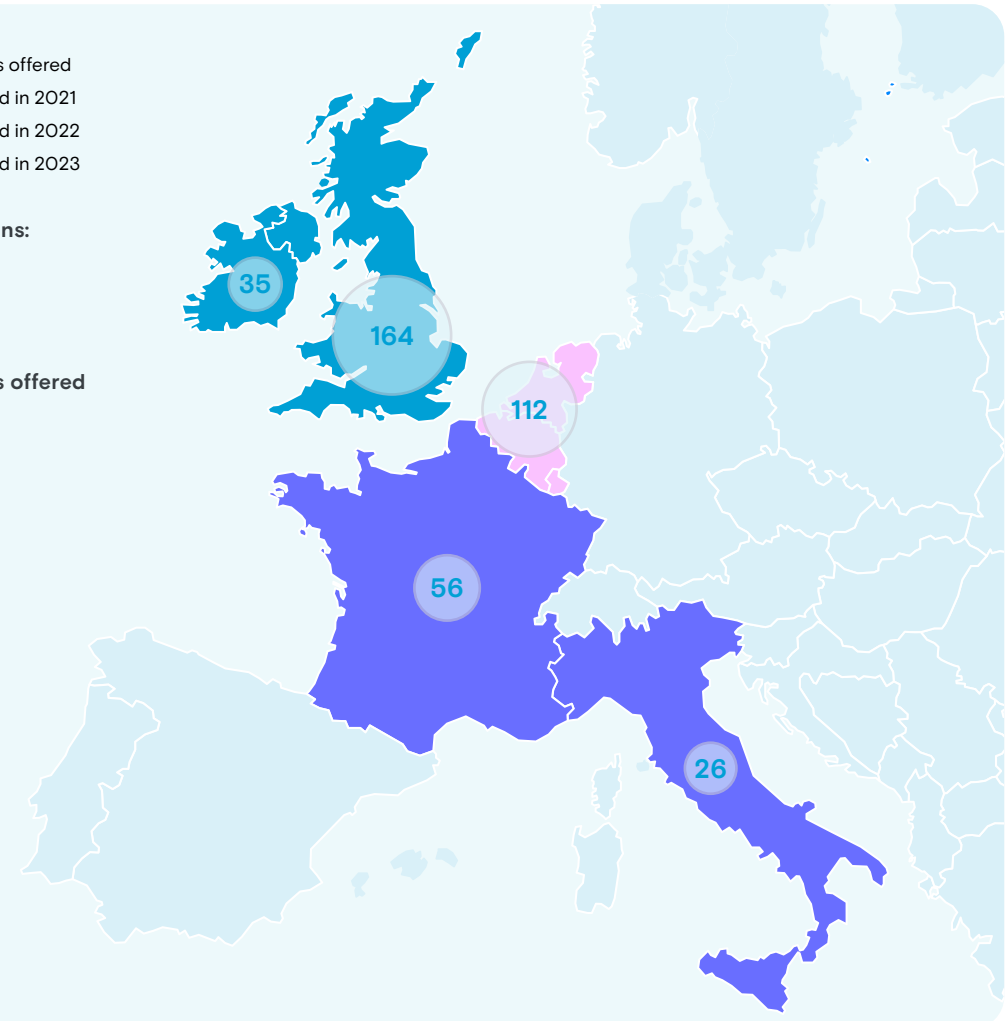
- Total number of sessions offered
- Repair workshops started in 2021
- Repair workshops started in 2022
- Repair workshops started in 2023

Total number of sessions:

# 393

Total number of places offered

# 7,157



1. These include sessions held with The Fashion School, Manchester, UK.

# Clothes that can be recycled

We've committed that our clothes will be recyclable by design by 2027. Currently there is no single industry-recognised definition of the word 'recyclable' for textiles and clothing, but we've focused on scaling items that are circular by design in certain categories. We've also created specific product guidelines and engaging and training colleagues and suppliers on circular design principles. In other categories, we're testing, trialing and learning to overcome significant and inherent challenges. For example, some types of products and materials are much harder than others to move to a circular design.

Our own [Circular Product Standard \(CPS\)](#) sets out how we intend to design products now and in the future. It is built on the [Ellen MacArthur Foundation's](#) vision of a circular economy for fashion and covers key aspects of clothing design: use of more sustainably sourced materials, durability, and recyclability.

We launched our first circular collection last year and continue to train teams to begin scaling circular design in key product categories such as denim and jersey, which are easier to design for recyclability at the end of their life, including the setting of more specific internal targets for these areas. We continue to translate these principles into tangible and practical guidelines for different clothing types and categories, such as knitwear.

**3% of all our clothing unit sales met the criteria set out in our CPS. In key categories where many products are made using cotton, such as t-shirts and denim, 11% of all t-shirt and 5% all of denim sales meet our circularity criteria, respectively.**

We are now looking at circularity solutions for products made of blended fibres (recognised as one of the major inhibitors of textile-to-textile recycling) and other product categories, such as socks or lingerie, which are more difficult to move into circular design due to their performance or function. We are starting to look at what long-term strategies are feasible here.





## Clothes that can be recycled

## How is a t-shirt made in line with the Primark Circular Product Standard?<sup>1</sup>

The t-shirt has been designed using one type of material (mono-material) so that it can be more easily recycled at the end of its life.

Main fabric of the t-shirt is 100% cotton, made using cotton from the Primark Cotton Project and/or recycled cotton and/or organic cotton.

5% of the t-shirt is made up of trims, stitching threads, embellishments or buttons, which where possible, are removable or recyclable.

The t-shirt has been designed for physical durability, meeting the wash and performance testing under our Primark Durability Framework.

1. Learn more about our Circular Product Standard here: <https://primark.a.bigcontent.io/v1/static/Primark-Circular-Product-Standard-2023>

## Clothes that can be recycled



### Launch of advanced circular design training: Circular Textiles Foundation

Our Circular Design training programme was co-developed by [Circle Economy](#) and the [Sustainable Fashion Academy](#) last year. It began as a foundation course, which is mandatory for all Product Teams and some select suppliers. To date, 529 colleagues (80% of Product colleagues) have completed the foundational training, which is designed to orient and familiarise colleagues with the basic concepts of a circular economy for fashion.

To apply the learnings to different product categories, this year we evolved the programme to create 'expert' level training. These sessions, run in partnership with the [Circular Textiles Foundation \(CTF\)](#) and involve smaller groups of colleagues and select suppliers. Working with CTF, each group co-creates a blueprint for a circular product in their specific categories.

Part of this advanced training includes in-person sessions where we examine the challenges and gaps we need to overcome to implement circular design principles. For example, much of our knitwear is made using blends of several fibre types. In our advanced sessions, we explore ways to minimise the number of blends while maintaining performance, look and feel.

### Collaborating to keep clothes in circulation

This year, we joined the Fashion ReModel, a [Ellen MacArthur Foundation](#) project involving leading brands to help the industry unlock the barriers to scaling circular business models. Together with the Ellen MacArthur Foundation, we're now exploring how to unlock barriers to scaling new revenue streams across resale, rental, repair, and remaking.

This project builds on work we're already doing to encourage customers to keep clothes in circulation. Since 2022, we've been making pre-loved clothing more accessible to our customers through our partnership with the Vintage Wholesale Company WornWell with concessions in selected stores. Since opening 10 WornWell concessions in stores across the UK and ROI, more than 150,000 pre-loved garments have been sold. WornWell is an independent concession and we are pleased to support a small business to scale up its efforts in contributing to the circular fashion movement.

Progress is underway for new Primark customer offerings across pre-loved, we have started with a trial of 'Primark presents Pre-loved' in seven UK stores during last summer, featuring an exclusive collection of vintage music t-shirts.



# Reducing textile and clothing waste

Textile waste is generated in our supply chain. Most of the time it happens when fibres are produced and fabric is cut into pieces for making clothes, so we're working with suppliers to understand this issue better. Particularly, how we can better support our suppliers to reduce textile waste and improve recycling capabilities so end-to-end circularity can be better integrated into clothing supply chains.

## Supporting Textile Waste Recycling in Cambodia

According to [Global Fashion Agenda \(GFA\)](#), Cambodia's textile, garment and footwear industry generates approximately 140,000 tonnes of textile waste each year, most of which undergoes unregulated downcycling, and incineration, or ends up in landfills. To help combat this, we joined a pilot project in December 2023, led by [GIZ](#) and the GFA, to explore how to improve post-industrial textile waste recycling in Cambodia.

12 brands are involved in the pilot and six of our suppliers' factories are now participating. Its core focus is to improve circularity with textile-to-textile recycling and to support compliance and sustainability within textile waste management.

To date through this pilot, over 3,000 tonnes of textile waste have been diverted from landfill or incineration. All six of the factories have also contracted recyclers to handle textile-to-textile recycling. One has even been called out as a best-in-class example of textile waste segregation.

## Revolutionising Pakistan's Textile-to-Textile Recycling Industry

In March 2024, Primark joined a textile-to-textile programme led by Reverse Resources (RR) and the National Textile University (NTU) in Pakistan. Its goal is to establish a structured framework for managing textile waste, ensuring transparency and verifiable traceability in the recycling process. The programme is also supported by the [Sustainable Manufacturing and Environmental Pollution \(SMEP\)](#) programme, the [Foreign, Commonwealth and Development Office \(FCDO\)](#) and is implemented in partnership with the [United Nations Conference on Trade and Development \(UNCTAD\)](#). This programme aims to build on the success of the Reverse Resources programme in Bangladesh.



## WRAP x Primark

This year, we announced our new [partnership with WRAP](#) to support our commitment to giving clothes a longer life.<sup>1</sup> This three-year partnership will explore how collaboration and innovative solutions can better manage textile waste. This includes looking at the next step for our Textile Takeback scheme and other routes for circular business models.

“We are proud to be continuing our work, which spans many years, with Primark via this new partnership. Circular living is a key business opportunity for this generation so it is fantastic to see a fashion giant like Primark gaining recognition in this emerging area. Without widespread scaling of circular business models which are accessible to people, the world will not be able to achieve vital carbon and water reductions. WRAP's mission is to embed circular living in every boardroom and every home. We are working in new ways with businesses like Primark, and across the world, to accelerate progress towards our goal of cutting the carbon footprint of the textiles industry in half by 2030.”



**Catherine David**  
Director of Behaviour  
Change & Business  
Programmes

**wrap**

1. WRAP X Primark partnership began on 24 October 2024

## Reducing textile and clothing waste

### Expanding our Textile Takeback scheme

Our Textile Takeback scheme is one part of our wider approach to circularity within our business. With the help of recycling partner [Yellow Octopus Circular Solutions](#), we offer customers and colleagues a convenient way to donate unwanted clothing or textiles and give items a second life. If textiles or clothes put into the takeback boxes can't be reused or resold they will be recycled.

We collect customers' pre-loved clothes, textiles and various accessories at collection boxes in all stores across the UK, Republic of Ireland (ROI), Austria, Germany and the Netherlands<sup>1</sup>. Each donated item is sorted and graded by Yellow Octopus Circular Solutions to be re-loved by someone else or recycled.

Our Textile Takeback scheme covers just over 64% of our total store footprint globally. We plan to expand the scheme to all stores across all markets by the end of 2025, in line with local regulations.

Funds we raise from items which are resold support UNICEF in providing better access to education, health, water and hygiene, as well as life-saving aid to children in need.

**Textile takeback (cumulative figure as of July 2024):**

**638 tonnes**

**69%**

of items were suitable for resale

**31%**

of items were recycled or repurposed

**£48,000**

in funds raised for UNICEF (cumulative figure as of July 2024)

### Managing excess stock

Our lean business model allows us to minimise excess stock. Where we do have unsold stock and buying samples, these are donated, and then resold or recycled by the partners below.

- UK and Ireland: Head office samples in Ireland and unsold stock from UK stores are donated to [Newlife](#), a charity supporting disabled and terminally ill children across the UK. We donated 44,411 cartons of stock to Newlife this year. 87% were sold in its charity shops, and 13% were responsibly repurposed or recycled.
- US: Donations are made to [Delivering Good](#), a charity that gives items to those dealing with poverty, disaster and other challenges. Over the reporting period, we donated 24 tonnes of products.

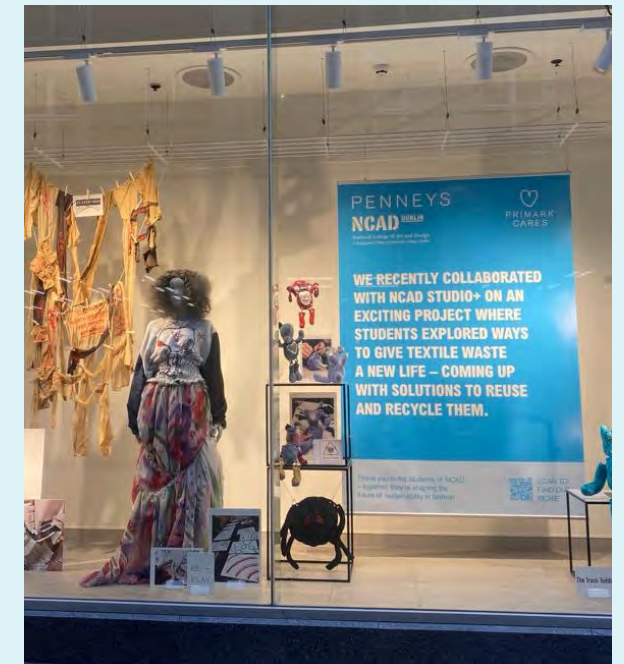
### Customer swap shops

In September 2024, we launched Swap Shops in select UK stores as part of the [British Fashion Council's](#) citywide events. In partnership with [Verte](#), a circular clothing swapping company, we offered customers the chance to swap their clothes from a curated collection of pre-loved clothing from all brands. Any clothes not chosen were kept for the next swap shop event, donated to local charities, or placed in our Textile Takeback boxes.



### Textile Takeback scheme with National College of Art and Design

In October 2023, we gave the donations from our Textile Takeback in our Mary Street store in Dublin to students at the [National College of Art and Design \(NCAD\)](#). The students then took part in a six-week project to find creative ways to give the textiles a new life. They explored how various techniques, education and digital platforms could turn these pre-loved items into new products. Primark colleagues also provided students with practical guidance, support, and information to support their recycling and reuse initiatives.



1. We now also have takeback boxes in Head Offices in UK and ROI.



# Protecting life on the planet

We have a responsibility to reduce the impact of both our own operations and those within our supply chain, as set out in our Planet commitments. We continue to take action in other areas, such as water stewardship and more sustainable chemicals management, which are underpinned by our long-standing [Environmental Policy](#).

## Planet commitments

**Halve our carbon footprint:** we will halve carbon emissions across our value chain by 2030.

**Eliminate non-clothing waste:** we will eliminate single-use plastics and all our non-clothing waste by 2027.

**Restore biodiversity:** our Primark Cotton Project will use more regenerative agricultural practices by 2030.



We began biodiversity surveys on 14 farms in our Primark Cotton Project across five villages in Gujarat, India.



Our total Scope 3 GHG emissions, which represent the biggest portion of our carbon footprint, reduced by

**12%**

in 2024 compared to last year and were 0.6% lower than our 2019 baseline.



We have seen an increase in the uptake of more regenerative agricultural among farmers involved in our three-year pilot in our Primark Cotton project.

# Halving our carbon footprint

Reducing our carbon footprint is an essential way we can play our part in mitigating the risks and impacts climate change presents to our planet and future generations.

We've pledged to achieve a 50% reduction in absolute Scope 1, 2 and 3 emissions by 2030 from a 2018/19 base year. This target also encompasses the commitments we've made through reputable third parties, most notably:

- [UNFCCC Fashion Industry Charter for Climate Action](#)
- [Science Based Targets initiative \(SBTi\)](#)
- [WRAP's Textiles 2030 initiative](#)

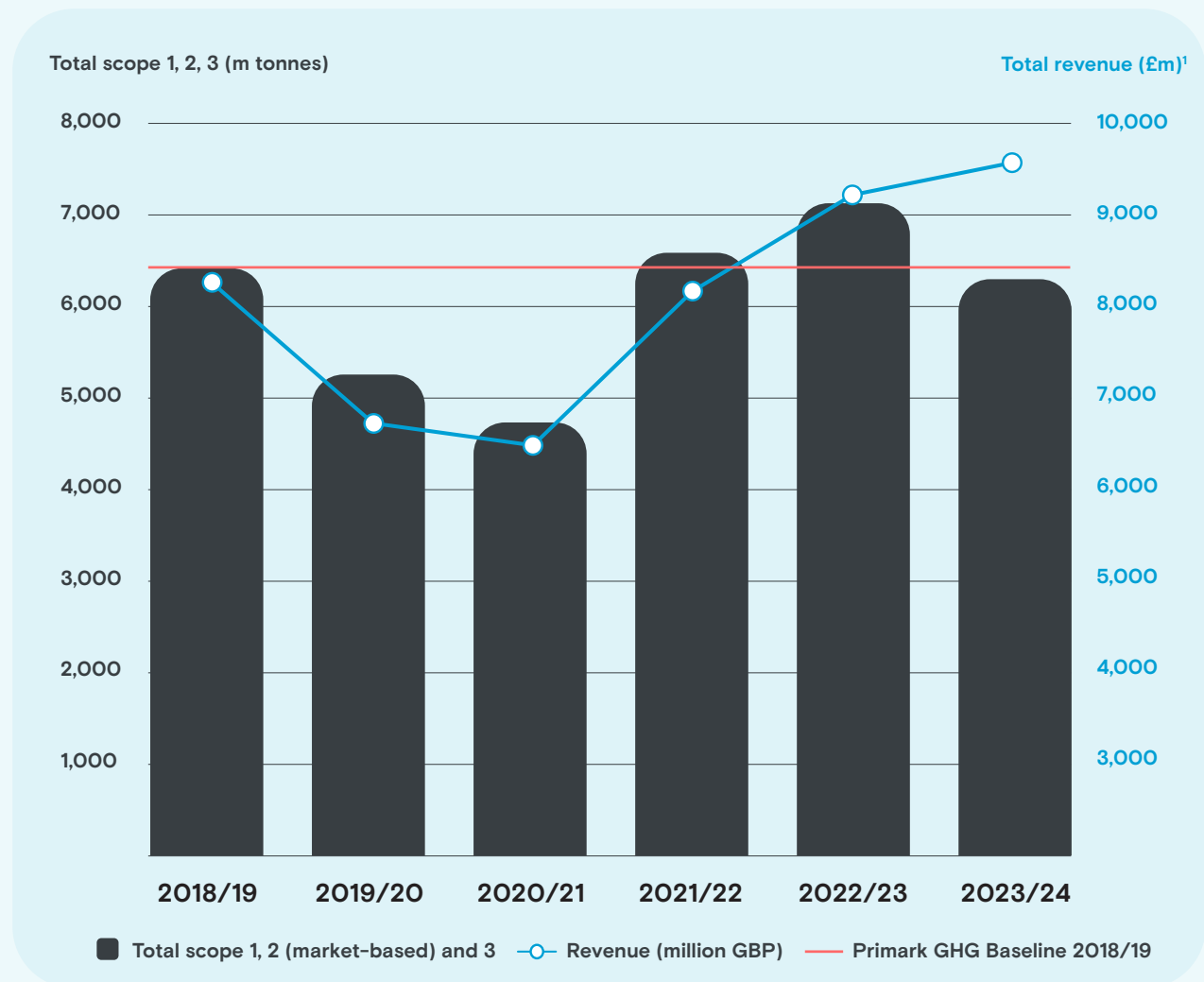
Our roadmap to meet this ambition is disclosed through our annual [Transition Plan](#).

## Our progress to date

Our year-on-year performance shows a decrease in emissions across Scopes 1, 2 and 3 compared to our previous year (FY 2022/23) of 12%.

This is due to an approximate 5% year-on-year decrease in the volume of material procured for our goods for resale, alongside the success of our efforts to decarbonise our business, and global emissions reduction trends, such as the global increase in renewable power and efficiency which resulted in reduced emissions factors for certain good and services.

Towards our Primark Cares carbon target, to halve carbon emissions by 2030 from a 2018/19 baseline, we've achieved a 1.9%Δ decrease in emissions across Scopes 1, 2 (market-based)<sup>1</sup> and 3. This reduction is largely due to the success of our work to reduce Scope 1 and 2 emissions, alongside key actions covering wider business activities, such as upstream transportation.



1. Scope 2 figures for 2018/19 to 2021/22 represent location-based emissions. For the purpose of reporting against targets, Primark have been tracking Scope 2 (market-based) since 2022/23.

## Halving our carbon footprint

This year, we joined the [Value Change Initiative \(VCI\)](#), a peer-to-peer learning forum bringing together climate experts developing solutions to drive value chain emission reductions and removals. We're participating in the apparel sector working groups to help advance our approaches in this space.

## TCFD

Building on the risk disclosure we make via our parent company ABF under the [Task Force for Climate-related Financial Disclosures \(TCFD\)](#) requirement, we've been working to understand what climate risk management looks like specifically for Primark and taking an approach that's aligned to our wider risk management approach. We're also assessing how we could embed this into our planning to strengthen the long-term resilience of our business.

## Reducing emissions in our operations

Scope 1 and 2 emissions include those generated by running our stores and offices, in addition to our transport and distribution centres. These are smaller than emissions in Scope 3 but it is where we have the most direct influence.

Under our SBTi commitment, and as a signatory of the UNFCCC Fashion Industry Charter for Climate Action (FICCA), we have two specific commitments covering our own operations. These are:

- **SBTi:** Primark commits to reduce absolute scope 1 and 2 GHG emissions by 50% by 2030 from a 2019 base year; and
- **FICCA:** Secure 100% of electricity from renewable sources with minimal other environmental or social impacts, for owned and operated (Scope 2) emissions by 2030.

This 52% reduction meets the threshold of Primark's SBTi validated Scope 1 and 2 emissions target ahead of our 2030 deadline. However, we know that with our growth, and renewable power procurement challenges in some markets where we trade, we may drop below the 50% threshold in the short term. However, we're committed to evolving our programmes and strategies so we can meet our 2030 target in the most robust way.

GHG Protocol Category	Baseline 2018/19	Last year 2022/23	Current year 2023/24	Change against last year	Change against baseline year
<b>tCO<sub>2</sub>e</b>					
Scope 1	20,602	21,179	23,154	9%	12%
Scope 2 - Location based	139,841	99,195	85,406	-14%	-39%
Scope 2 - Market based	-	75,860	53,795	-29%	-62%
<b>Scope 1 &amp; 2 (Market-based)<sup>2</sup></b>	<b>160,443</b>	<b>97,039</b>	<b>76,949</b>	<b>-20.7%</b>	<b>-52%</b>
Scope 3	6,246,005	7,018,793	6,210,586 <sup>Δ</sup>	-11.5%	-0.6%
<b>Total scope 1, 2, 3 (Market-based)<sup>2</sup></b>	<b>6,406,448</b>	<b>7,115,832</b>	<b>6,287,535<sup>Δ</sup></b>	<b>-11.6%</b>	<b>-1.9%<sup>Δ</sup></b>

We have reduced our Scope 1 and Scope 2 (market-based) emissions by 52% compared to our 2018/19 baseline. This has been achieved through energy efficiency measures in our stores and the procurement of renewable and low-carbon electricity for powering our stores, head offices and depots.

1. Scope 2 emissions for the 2018/19 baseline year were calculated using the location-based method, which uses location specific grid-average emissions factors. As Primark did not procure any renewable or low carbon power at that time, it is considered an appropriate methodology to establish baseline impact. For 2023/24, we are reporting under the market-based method, taking into account Primark's energy contracts and their associated emissions factors. We consider this to be a more accurate calculation method that can reflect the improved emissions performance achieved from renewable energy procurement.
2. For the purpose of reporting against targets Primark have been tracking Scope 1 & 2 Market based since 2023

## Halving our carbon footprint



### Renewable and low carbon energy procurement

We continue to evolve our approach to procuring renewable and low carbon energy<sup>1</sup> to power our stores, head offices and depots. This has been informed by our planet commitments as well as third-party guidelines and standards that govern these, notably the GHG Protocol Standard<sup>2</sup> and the RE100.

Currently, most of the renewable and low carbon energy we obtain comes in the form of bundled procurement, where energy and energy attributes<sup>3</sup> are procured together in the same contract and transaction. This approach has led to our Scope 2 market-based emissions being lower than our location-based emissions. The market based emissions are based on the actual energy purchasing decisions we have made/control, rather simply the average intensity of the local grid, giving a more accurate picture.

# 64%

of our electricity demand in our own operations was covered by renewable energy in 2023/24

### Procurement challenges

Access to low carbon and renewable power can be challenging in some geographies, particularly as we look to entering into power purchase agreements (PPAs). We are working to secure the most robust options possible in line with the guidance of the RE100.

### Improving energy efficiency in our stores

We constantly look for ways to make energy-efficiency improvements to our that reduce our carbon footprint without impacting the shopping experience for our customers. All Primark stores and distribution centres, with the exception of our new store in Hungary, are certified to [ISO 50001](#), the globally recognised standard for energy management systems.

This year, we continued to build our network of Energy Champions across the Primark estate, with hundreds of colleagues now trained to drive down energy consumption in stores.

1. Low carbon refers to lower carbon dioxide (CO<sub>2</sub>) emissions than conventional energy sources. There are four main types of low-carbon energy: wind, solar, hydro or nuclear power.
2. The GHG Protocol standard is a framework for businesses, governments, and other entities to measure and report their greenhouse gas emissions.
3. Energy attributes are data attributes that describe the performance or characteristics of an energy generation resource.



## Halving our carbon footprint

### Reducing Scope 3 emissions in our value chain

The majority of our emissions occur in our wider value chain. Sourcing and collating data on these impacts is evolving as we progress our decarbonisation programme and improve data around product traceability.

We're increasing the amount of data we get from our suppliers, which is incorporated into our Scope 3 calculation, but we still rely heavily on industry average data for many of the impacts we assess as part of this calculation. These data limitations should be considered when reading and interpreting our results.

Emissions in our value chain that we don't directly control (Scope 3) made up 98.8% of our total carbon footprint in 2023/24. The table shows the decrease in our Scope 3 emissions since our 2018/19 baseline year. Tackling the three biggest sources of our Scope 3 emissions is the key focus of Primark's decarbonisation roadmap.

#### These are:

##### Category 1: Purchased goods and services (goods for resale)

Emissions related to the manufacturing of our products by suppliers (including tiers one, two and three).

##### Category 4: Upstream transportation

Emissions related to transporting goods from suppliers to Primark depots, and from depots to Primark stores.

##### Category 11: Use of sold product

Emissions related to the way customers use our products and how they dispose of them (see our Product section on pages 35-44).

##### Category 1: Purchased goods and services (goods for resale)

Like most clothing brands, we don't own any of the factories in our supply chain. So, supplier engagement is key to reducing emissions caused in the making of our products.

We work with selected suppliers across tiers one, two and three to address energy consumption and other emission sources within their factories. At the tier four level, we focus on switching to more sustainable materials and training farmers in our Primark Cotton Project.

GHG Protocol Category	tCO <sub>2</sub> e				
	Baseline 2018/19	Last year 2022/23	Current year 2023/24	Change against last year	Change against baseline year
Cat 1 Purchased goods and services	4,771,324	5,854,005	5,138,034	-12%	8%
Cat 2 Capital goods	123,393	209,811	115,174	-45%	-7%
Cat 3 Fuel and energy-related activities	34,904	23,474	20,401	-13%	-42%
Cat 4 Upstream transportation	506,663	304,680	289,054	-5%	-43%
Cat 5 Waste generated in operations	4,297	3,341	4,468	34%	4%
Cat 6 Business travel	10,573	4,993	8,618	73%	-18%
Cat 7 Employment commuting	-	-	2,818	N/A	N/A
Cat 11 Use of sold products	756,260	587,601	576,106	-2%	-24%
Cat 12 End of life	38,591	39,888	35,055	-12%	-9%
Cat 13 Downstream and leased assets	-	-	20,857	N/A	N/A
<b>Total</b>	<b>6,246,005</b>	<b>7,018,793</b>	<b>6,210,586</b>	<b>-11.5%</b>	<b>-0.6%</b>

## Halving our carbon footprint

### Manufacturing and finishing efficiency

We're training and upskilling suppliers to increase energy efficiency in their factories, and auditing factories to actively identify resource efficiency opportunities.

Alongside our efforts to make factory processes efficient, we're supporting suppliers and factories to switch to renewable energy sources. This year, we began implementing our supply chain renewable energy roadmap to 2030, starting in India. Working with our partner Ren Energy and factories in the Tamil Nadu region, we investigated opportunities for collective purchasing of on-site solar panels. Our initial developer shortlist suggests factories could pay around 25% less per kWh versus average grid tariffs. We are also exploring opportunities for collective purchasing of offsite-generated renewable electricity, which offers the potential to cover a greater percentage of a factory's energy needs.

This year, we also carried out climate action training in Vietnam, building on our work in Cambodia last year that saw us roll out the training developed by [GIZ](#), in collaboration with the [Fashion Charter for Climate Action](#) and selected signatories. It provides garment, textile and footwear manufacturers with basic knowledge of climate change, the impact of the fashion industry, energy efficiency, and renewable energy, as well as practical expertise on greenhouse gases and carbon accounting.

Emissions associated with manufacturing and finishing by tier one suppliers have been trending downwards year on year. Beyond tier one however, it is challenging to obtain Primark-specific data and projects are taking longer to implement. Therefore, we are still seeing an increase in emissions at these stages of the supply chain.



### Tackling energy and water efficiency together

**Energy usage and water consumption are closely linked in fabric manufacturing since most of the energy used occurs during water-intensive processes.**

Since 2018, we've been using the [Apparel Impact Institute's Clean by Design](#) initiative which guides factories in reducing their environmental footprints. Over the last two years we've built on these learnings to launch our own resource efficiency programme, which started with Bangladesh and has since moved into China and India.

Working with a partner on the ground, we identified opportunities in 29 factories to reduce GHG emissions annually by an average of 32% (equivalent to a total GHG reduction potential of 125,335 tCO<sub>2</sub>/y) and water consumption

by an average of 17% (equivalent to a total water reduction potential of 2,379,297m<sup>3</sup>/y)<sup>1</sup>.

Over the next 12 months, we will support factories to implement the measures and prioritise sites for a wider rollout. This year we have onboarded an additional 51 factories in India and China, on top of the 29 in Bangladesh. However, as each project can take 18 months to two years to complete, we don't yet have a full set of data on our resource efficiency programme.

1. All data points are for full factory operations. The % savings may not be realised fully for Primark, depending on the product being sourced from that factory.

## Halving our carbon footprint

### Category 1: Purchased Goods and Services

This year there has been a reduction in emissions generated in the Raw material extraction stage of our textiles and accessories supply chain (Tier four), versus last year of 18.6%. This is because of two main initiatives:

- Transitioning to more sustainable materials as part of Primark Cares commitments (see the [Product section](#)); and
- Supporting farmers in our Primark Cotton Project to move to more regenerative agricultural practices.

However, since the total volume of materials sourced by Primark has increased since 2018/2019 baseline, in line with business growth over the same period, the absolute impact of this stage of our supply chain still shows an overall increase of 9.8%.

These year-on-year trends show that Primark's approach to tackling emissions at tier four stage is beginning to yield results, helping to decouple our emissions from business growth.



### Category 4: Upstream transportation

Like most international retailers, we source our products from multiple markets across the world. How we transport these products from our sourcing countries to our depots impacts the amount of carbon we emit across our value chain.

### Partnering with Maersk

We ship most of our products by ocean, which has a lower environmental impact than air transport. Shipping by sea also helps to keep our prices affordable for our customers as its more cost effective than air transport.

One important development we are integrating into our business and our supply chain is with our shipping partner of six years Maersk, who are helping us evolve how we get our products from our suppliers' factories to our depots.

Through our partnership, Maersk have started to introduce more sustainable fuel alternatives, such as Biofuel, instead of fossil fuel when shipping our products.

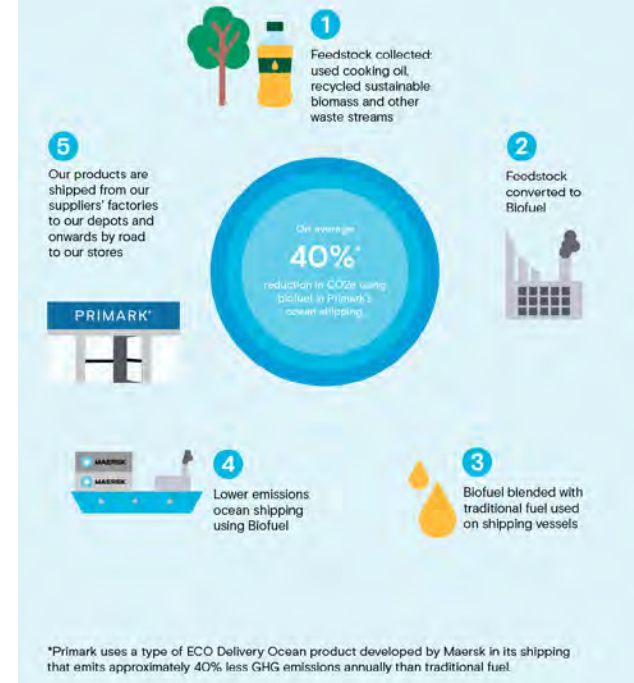
The Eco Delivery Ocean biofuel used by Maersk must be certified by a third party to verify the stated GHG emissions savings are accurate. Once the fuel is certified it is blended with traditional/conventional fuel and used on Maersk shipping vessels. This biofuel product emits approximately 40% less GHG carbon emissions annually than traditional fuel.<sup>1</sup>

This is a really important step for Primark, and our commitment to more sustainable fuel alternatives supports Maersk's investment in future research as they continue to identify more sustainable and innovative fuel solutions for the future.

It's an ever-changing space but we believe using more sustainable fuel alternatives has the opportunity to bring positive change to how we ship our products and support our progress to reducing our carbon emissions across our value chain by 2030.



## How Biofuel Works



### What is biofuel

Biofuel is a more sustainable fuel alternative. It is manufactured from used cooking oil, recycled sustainable biomass and other waste streams that can't be used elsewhere.

1. Primark uses a type of ECO Delivery Ocean product developed by Maersk in its shipping that emits approximately 40% less GHG emissions annually than traditional fuel. By procuring different types and batches of more sustainable fuel, Maersk knows exactly the GHG/CO<sub>2</sub>e emission reduction from using each fuel on a life cycle basis and can therefore calculate the overall average annual emission reduction.

## Halving our carbon footprint



### Understanding the environmental impact of our supply chain

To better understand the environmental performance of our suppliers' factories, we use the Higg Facility Environmental Module (FEM). Factories that make up over 70% of Primark's capacity are invited to complete the assessment. This year, 1,309 facilities have completed their Higg FEM self-assessments. Of that group, 906 sites have verified their self-assessment and had an average score of 47%<sup>1</sup>. Factories are given one score overall but this can be broken down into sub-scores such as energy, water, waste and chemistry. Having sight of these scores allows factories and us to identify opportunities for improvement in environmental performance.

We also put our China supply chain through the Green Supply Chain CITI evaluation, developed by the [Institute of Public and Environmental Affairs \(IPE\)](https://www.ipe.org.cn/). The evaluation assesses brands on the environmental management of their supply chains in China. In 2024, Primark improved its CITI score compared to 2023, ranking number six out of 126 companies in the textile industry and six overall out of a total of 780 brands<sup>2</sup>. This is a result of our continuous efforts to improve the environmental performance of suppliers in China beyond our tier one factories.

### Supplier engagement

This year, we launched a Supplier Carbon KPI requiring our top 100 suppliers to set greenhouse gas (GHG) emission reduction targets within tier one and two of their own supply chains. Suppliers are asked to use guidance prepared by the Science Based Target initiative and the Greenhouse Gas Protocol Standards.

Our aim is to encourage and reward suppliers that have already taken action to reduce emissions and give clear direction to those at the start of their journey.

1. The Green Supply Chain Corporate Information Transparency Index (CITI) assesses brands on the environmental management of their supply chains in China. The evaluation uses government data and public information published by the brands to assess overall supply chain environmental management. The CITI report has been published annually since 2014. More information can be found here: <https://www.ipe.org.cn/GreenSupplyChain/CITI.html>

# Restoring biodiversity

More than a third of the world's land surface is devoted to crop or livestock production. Conventional farming methods, including the overuse of chemicals, are depleting soil, harming ecosystems and releasing carbon into the atmosphere. Climate change is both exacerbating, and exacerbated by the problem.

Since cotton is the main fibre used in our clothing and cotton production involves resource intensive processes, we are focused on supporting and enhancing soil health and biodiversity. That's why one of our Planet commitments is that farmers in our Primark Cotton Project will use more regenerative agricultural practices by 2030. We have a framework for measuring whether farmers have adopted these practices and a baseline of practice adoption against which to benchmark future progress.



## Shifting to regenerative agriculture

Over recent years, we've evolved our Primark Cotton Project to focus the training on more regenerative agricultural practices, following [CottonConnect's REEL Regenerative Code](#). Regenerative agricultural practices, which have been built into the curriculum for farmers since 2023, are designed to help farming work in sync with nature, restoring the soil, protecting biodiversity and preserving water. For example, incorporating cotton stalks into the soil increases carbon and nitrogen content, supporting plant growth. It also prevents the need for crop burning, which contributes to climate change.

## Regenerative agriculture pilot results

By the second year of the pilot, we found that 80% of farmers had implemented at least two soil health practices (such as crop rotation or intercropping), 55% at least two pest management practices (such as homemade bio-pesticides and use of traps) and 26% one water management practice (like furrow or micro irrigation). Many farmers also chose to plant trees around the cotton farms to improve biodiversity.

**In November 2023, Primark, [CottonConnect](#) and our local partner [SEWA](#) won Partnership of the Year at the Reuters Responsible Business Awards 2023 for the Primark Cotton Project, with one judge commenting: "If you work in sustainability agriculture, this is something to be replicated."**

The data from year three is still being collected but we expect to see an increase in the uptake of regenerative practices across all areas among the farmers.



## Restoring biodiversity

### Measuring our impact on biodiversity

It is likely to take several years before we see the impacts of biodiversity restoration within our Primark Cotton Project. To measure progress over time and refine the programme as our understanding evolves, we have a Biodiversity Monitoring Programme.

We began in March 2024 with biodiversity surveys on 14 farms spread over five villages in the Indian state of Gujarat, working with our consultant partners Biodiversity and the Srushti Conservation Foundation.

Two of the villages contained Primark Cotton Project farms and three were control villages where farmers had not been trained in more regenerative agricultural practices. In each village, the farms and an area of natural habitat was monitored so that we can see how the farms are performing in comparison. Species monitored included plants, invertebrates, reptiles, amphibians, birds and mammals. We also conducted soil sampling and tested soil organic carbon content as an indicator of soil biodiversity. We assessed local farmers on their level of understanding about biodiversity and captured their observations about changes in the abundance of important species.

Our monitoring methodology is based on the Biodiversity Monitoring Framework we have developed over the last three years. The Framework aligns with the [Science Based Targets for Nature \(SBTN\)](#), the [Task Force on Nature-related Financial Disclosures \(TNFD\)](#) and the [International Union for Conservation of Nature \(IUCN\)](#) guidelines for planning and monitoring corporate biodiversity performance.

We will continue to conduct biodiversity surveys over the next five years. We also aim to begin surveys on a similar sample size of farms in Bangladesh and Pakistan.

### Managing climate change impacts

Beyond training, the Primark Cotton Project is providing additional support to help farmers manage the consequences of climate change. This year, in Gujarat, India we supported over 100 farmers affected by cyclone damage, for example by funding the construction of rainwater harvesting structures to provide access to fresh drinking water. We also built a shelter and toilets at a community learning centre that will benefit the wider community.

To explore ways to help build cotton farmers' climate resilience, we commissioned the International Institute for Environment and Development to assess the availability and uptake of insurance products for farmers that guard against risks such as the effect of extreme heat on production. This revealed a relatively high uptake of crop insurance (used by 60% of respondents) compared to other products, such as livestock insurance (used by 8% of respondents). However, it identified that crop insurance often only repaid farmers against crop-related loans taken out rather than providing compensation for lost income.

The research identified key barriers to insurance uptake, the most significant being low product awareness (60% of respondents). Drawing on these insights, we are now considering how we can support potential new solutions to facilitate farmers' access to suitable insurance.

### Animal welfare

Our approach to animal welfare remains consistent, as outlined in our 2022/23 report and our [Animal-Derived Material Policy](#). We support the development of animal welfare standards and certifications, and our policy requires that our suppliers comply with these industry standards in the sourcing of our products. We do not conduct or support the use of animal testing that is not required by law. Our own-brand cosmetics are approved by [Leaping Bunny](#), an internationally recognisable gold standard for products that are cruelty-free.



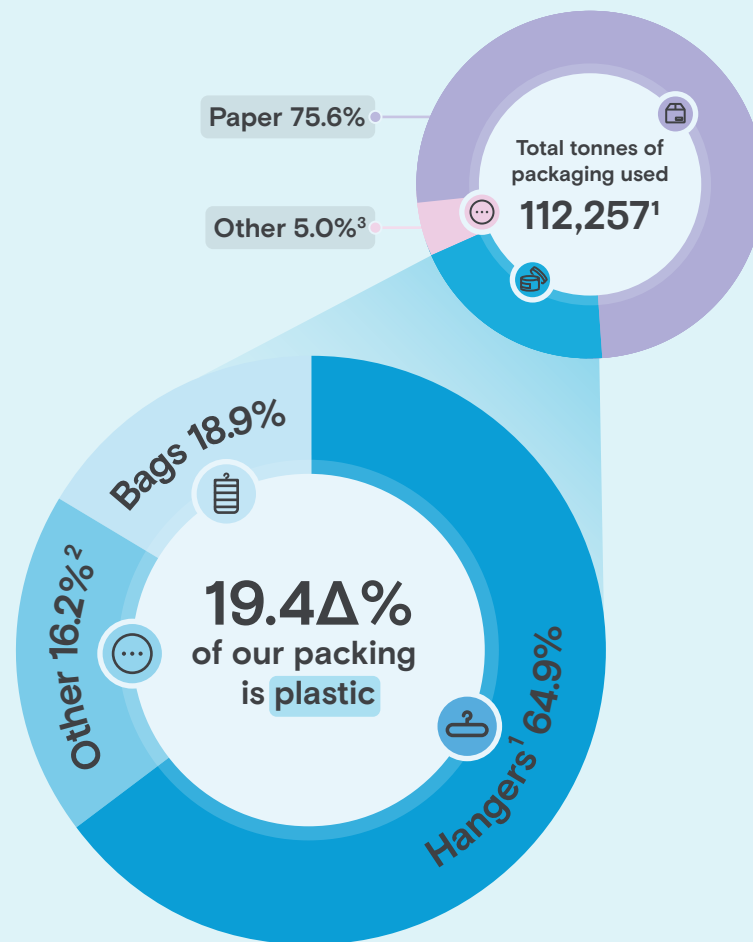
# Eliminating non-clothing waste

## Packaging Baseline

Total Tonnes of packaging used 112,257<sup>1</sup>

Packaging breakdown	%
Paper	75.6
Plastic	19.4 $\Delta$
Other materials <sup>3</sup>	5.0

Plastics breakdown	%
Hangers	64.9
Other <sup>2</sup>	18.9
Bags	16.2



## Changing our product packaging

Product packaging is one of our main sources of non-clothing waste, making its reduction a priority for us.

We've working to eliminate single-use plastics (SUP) by 2027. This year, we established a baseline for all the packaging in our business so that we can track our progress towards this commitment. As we don't purchase packaging directly, we collected data directly from 470 global suppliers on all our packaging between January 2022 and January 2023. Compliance with data collection will become part of the supplier scorecard (where supplier data is captured, measured and benchmarked to grade suppliers against performance criteria) from August 2024.

In 2022, our baseline identified 21,797  $\Delta$  tonnes of single-use plastic, which represents 19.4%  $\Delta$  (in tonnes) of our total packaging used. We're currently collecting our 2023 data and will now track and report our progress against this baseline, using our detailed packaging roadmap.

There continues to be challenges around the elimination of SUP from our business. This is because of practical limitations, technical constraints, and the absence of suitable alternatives – for example, hygienic shrink wraps on some skincare and beauty products are currently required. However, our dedicated in-house team of packaging technologists continue to drive the innovation and adoption of more efficient packaging and materials. We're also using our scale to partner with trusted packaging suppliers to develop new best-in-class solutions.

1. Data relates to 2022 baseline year. We have used an extrapolated methodology where we don't have supplier data.  
 2. Other materials include glass (3%), metal (2%), other (0.33%) composites (0.05%), wood (0.004%)  
 3. Bottles, Jars, Caps, Lids 4%, Straps, Clips, Bands, Tape 3%, Dividers, Inserts, Trays 3%, Ribbons 1%, Attachers/Ties 1%, Boxes, Cartons, Sleeves, Blister 1%, Film 1%, Buckets, Tubs, Tubes 1%, Other 1%, Labels 0.4%, Straps, Clips, Band 0.35%, Filling 0.01%, Display Unit 0.01%

## Eliminating non-clothing waste

### Other packaging initiatives

- **Plastic film used to protect garments in transit:** Since September 2022, we've collected 2,178 tonnes so that it can be recycled into new film.
- **Bra accessories and headphones:** We are transitioning to easier-to-recycle polyethylene terephthalate (PET) with a minimum of 30% recycled content.
- **Baby bodysuits:** We have reduced the packaging size by approximately 20%.

### Hanging onto our hangers

Clothes hangers make up almost two-thirds of SUP volumes used within Primark.

Durable new hangers, made from a minimum of 90% certified recycled polypropylene, are being phased in for main apparel ranges, with completion due in 2027

An increasing number of hangers in our baby range have now converted to certified recycled card, and we are converting lingerie and swimwear hangers from plastic to cardboard. This project will be rolled out by the end of 2025.



### Recycling and managing our own waste

We diverted 95%Δ of the waste we produce from our own operations from landfill this year. We continue to educate colleagues, both in retail and head offices, on how non-clothing and clothing waste can be reused or recycled, and have put textile takeback boxes in our offices.

We are working to standardise waste management across Primark operations, which include a global rollout of waste bins to enable segregation and recycling in every store, office and depot.



# Water

Since water is used at most stages of making our clothes, from growing cotton to dyeing fabrics, it's important that it's used efficiently.

We are signatories to [WRAP's Textiles 2030](#) initiative, which means we've signed up to a target to reduce the water footprint of new products we sell by 30%.

Through our 2030 Water Stewardship Strategy, we're managing our water impacts, risks and opportunities in three ways:

## Factory-based action

- Working with suppliers and factories to reduce water usage, reuse and recycle water, and drive advanced water quality management, particularly at sites in vulnerable, water-stressed regions.

## Sub-catchment (river basin) action

- Along with our suppliers in stressed sourcing basins, collaborating with other water users, including brands and governing bodies, to address shared water challenges.

## Product footprint

- Reducing our water impact in our supply chain through alternative materials and fibres use. Read more about our efforts [here](#).

## Understanding our water footprint and risks

This year, third-party specialists carried out a water footprint assessment across our value chain, looking at quantity and quality indicators. We now have a robust baseline against which to measure progress and can develop a roadmap encompassing both supply chain interventions and smarter material choices.

We have combined our water footprint findings with data from our annual assessments of water-related risks in our supply chain and data on water dependency at different factories. Together, this information is enabling us to target our efforts on water-stressed river basins and the factories that have the greatest potential impact on those basins.

## Collaborating for improved water management

In addition to working with suppliers to reduce water usage and to reuse and recycle water where possible, we're also committed to collective action, working with other stakeholders to address shared water challenges.

We continue to be funding members of the [Alliance for Water Stewardship \(AWS\)](#). Through the AWS's Impact Accelerator Programme, we are working to fast-track adoption of the [AWS Standard](#)<sup>1</sup>, the universal water stewardship framework at factories in priority basins. This year, 20 of our suppliers in Bangladesh, India and China underwent the first phase of the programme which included an assessment of water-related challenges in their catchments and a gap analysis of their readiness to address them. Over the next year, we will help them develop water stewardship plans for implementing the measures necessary to meet standards set out in the framework.

Wastewater recycling is a valuable, effective tool for suppliers facing significant water risks. This year, we partnered with multiple stakeholders, including other retail brands, WaterAid and technology providers, to start an innovative water recycling project in Bangladesh. Supported by the [UK Government's Sustainable Manufacturing and Environmental Pollution programme \(SMEP\)](#), we aim to understand how much wastewater can be efficiently recycled without compromising energy efficiency and chemical balance.

## Tackling water and energy efficiency together

Looking at energy and water usage together is helpful because water-intensive processes in textile production also tend to be energy-intensive. This year, we carried out audits at 29 factories in Bangladesh to identify potential energy and water savings as part of our [resource efficiency programme](#). See page 50 for details on how we found opportunities to reduce water consumption by an average of 17%, equating to savings of more than 2 million m<sup>3</sup> of water annually across the audited factories.

Alongside other global brands, we're also part of the [Corporate Water Leaders' Textiles and Leather Taskforce](#) to collectively address water challenges through our shared value chains. The first step in this initiative is to create a Common Water Framework (CWF) to set industry expectations and use the same language when engaging with suppliers.

## Understanding water quality impacts

Through our membership of the [Microfibre Consortium](#) and [Zero Discharge of Hazardous Chemicals \(ZDHC\) Foundation](#), we are measuring 'microfibres' – microscopic plastic-based threads shed by certain types of synthetic material – in wastewater, and working with suppliers to refine their processes and technologies to better target their removal.

We continue to collaborate with the [Oxford Molecular Biosensors \(OMB\)](#) to understand water quality impacts to freshwater biodiversity within a given catchment. The aim is for the work to help us and the industry drive greater wastewater performance.

1. The AWS International Water Stewardship Standard (AWS Standard) is a globally applicable framework for major water users to understand their water use and impacts, and to work collaboratively and transparently for sustainable water management within a catchment context.

# Chemicals management

Chemistry plays an essential role in manufacturing clothes, from growing cotton to dyeing fabrics to creating synthetic fibres such as polyester. We continue to support our suppliers and their factories with the tools and guidance to help them manage the use of chemicals correctly. Our approach is focused on continuing to strengthen compliance and risk management and support our suppliers to develop more sustainable chemistry methods. This includes optimising chemistry to cut water and energy intensity, and related GHG emissions.

## Collaborating with industry partners

We work closely with industry to help us improve chemicals management across our supply chain, including through our membership of the [AFIRM Group](#) and the [ZDHC Foundation](#).

Our [Restricted Substance List \(RSL\)](#) sets strict limits on chemicals used in manufacturing our products and aligns with that of the AFIRM Group and the [ZDHC Manufacturing Restricted Substances List \(ZDHC MRSL\)](#), Version 3.1.

Every year, ZDHC assesses our chemical management programme against its Brands to Zero framework. This year, our performance was rated as 'Accelerator,' which is the second highest level. Factories we work with are required to implement ZDHC measures such as submitting chemical inventories so that we can assess them against the ZDHC MRSL and testing their wastewater in reference to the ZDHC Wastewater Guidelines.

We are also working with ZDHC to develop a methodology for brands to implement more sustainable chemical technologies in their supply chains under the Chemicals to Zero Framework with a focus on driving improvements in areas such as increased water efficiency, recycling, reduced pollutant load and salt circularity.

During the past two years we have been collaborating with several other brands to expand the scope of the existing MRSL from fashion to additional product ranges, including homeware. We welcome ZDHC's announcement to take on this project to enable us to expand robust supply chain chemicals management across more of our product portfolio.

## Working with suppliers to manage chemicals

In our supply chain, many of the chemicals used are during wet processes such as the dyeing, printing, and washing of our materials. Our local teams based in our sourcing countries provide training about our chemicals management programme. Some achievements this year include:

- We supported training of 59 wet processors across India, Bangladesh and China, which has led to improvements in Higg FEM chemical scores.
- Three wet processors began piloting Aii's Clean by Design Chemistry and Wastewater programme, with some promising improvements indicated through the mid-term reports. The final outcomes will help to guide our future decisions for our on site-based efficiency improvements linked to Primark's broader Resource Efficiency Programme which covers our carbon, water, and chemistry efforts.
- Launching a due diligence programme with 20 wet processors<sup>1</sup> that have been prioritised for targeted, risk-based testing. We worked with the facilities to improve the quality of their wastewater and chemical management.
- Launching a new analytics dashboard, working with CleanChain, to provide improved access to supply chain

chemical and wastewater data for all our mapped wet processors related to our top 100 suppliers. This will lead to better decision-making, for example helping us react swiftly to improve discharges based on priority.

- Adding a new chemistry KPI among our top 100 suppliers to help drive improvements in our value chain.

## 2023 key wet processor highlights

- 423 factories have registered to the ZDHC Gateway chemical database
- 251 factories have submitted their chemical inventories through ZDHC InCheck reports
- 241 factories tested their wastewater to the ZDHC guidelines, equal to >80% in scope
- 198 completed "Supplier to Zero" training and met at least foundational level for their chemical management systems<sup>2</sup>

1. Wet processors are involved in the dyeing, printing, bleaching, tanning and washing materials, as well as other processes.  
2. Figures relate to the wet processors servicing our top 100 suppliers in 2023 calendar year.

# About our reporting

This Sustainability and Ethics Progress Report was published in November 2024 and, unless otherwise indicated, the information and data recorded relates to the period from 1 August 2023 to 31 July 2024.

The below metrics have been independently assured by Ernst & Young (EY) against the International Federation of Accountants' International Standard on Assurance Engagements Other than Audits or Reviews of Historical Financial Information – known as ISAE 3000 (Revised). These assured metrics are highlighted in this report with the symbol Δ.

Basis of reporting information for some of the metrics listed below can be found [here](#).

- Percentage of our cotton clothes containing cotton that is organic, recycled or from our Primark Cotton Project
- Percentage of our clothing unit sales containing recycled or more sustainably sourced materials
- Number of farmers trained in the Primark Cotton Project
- 2022 SUP packaging (tonnes) baseline
- Percentage of SUP to overall packaging (tonnes) baseline
- Percentage of our own operations waste diverted from landfill
- Number of audits conducted
- Percentage change carbon emissions across our value chain against our 2018/19 baseline
- Greenhouse gas emissions Scopes 1, 2 (market-based) and 3
- Number of countries of operation

As a division of ABF, we contribute to the [ABF Annual Report](#). We also contribute to the ABF Carbon Disclosure Project (CDP) and Task Force on Climate-related Financial Disclosures (TCFD) submission. Our GHG emissions reduction target has been assessed and validated by the SBTi, highlighting that our target is supported by the latest climate science criteria and recommendations.

Reporting methodology information for our carbon reporting can be found [here](#).

In line with the UK Modern Slavery Act, we publish a [Modern Slavery Statement](#) annually. This sets out the measures we have taken during the past year to mitigate against the risks of modern day slavery and human trafficking in our supply chain or within our operations.

Our website also provides details of our approach and is updated to highlight any new initiatives. We also regularly report through partner and third-party benchmarks. More information on our reporting can be found [here](#).



# Independent assurance statement to Primark limited

## Scope

We have been engaged by Primark Limited (“Primark”) to perform a ‘limited assurance engagement,’ as defined by International Standards on Assurance Engagements, hereafter referred to as the engagement, to report on selected non-financial indicators as listed below in Table 1 (the “Subject Matter”) for the year ended 31 July 2024 (or for the 52 weeks ended 14 September 2024 for metrics marked with an asterisk, or year ending 31 December 2023 for metrics marked with an ^) contained in the Primark Sustainability and Ethics Progress Report 2023/24 and in the ‘Social Audit Performance Statement’ subsection of the ‘Reports’ section of Primark’s corporate website (referred to as “the Primark Reports”).

The Subject Matter, as listed in Table 1, is also marked with a Δ symbol in the Primark Reports.

**Table 1: List of selected non-financial indicators**

Pillar	Indicator name
Product	<ul style="list-style-type: none"> <li>• Percentage of our clothing unit sales containing recycled or more sustainably sourced materials</li> <li>• Percentage of our cotton clothes containing cotton that is organic, recycled or from our Primark Cotton Project</li> </ul>
Planet	<ul style="list-style-type: none"> <li>• Greenhouse gas emissions (Scope 1, 2 market-based and 3) (tCO<sub>2</sub>e)</li> <li>• Scope 3 greenhouse gas emissions (tCO<sub>2</sub>e)</li> <li>• % change carbon emissions across our value chain against Y2018/19 baseline</li> <li>• % of our own operations waste diverted from landfill</li> <li>• Number of countries of operation*</li> <li>• 2022 single-use plastic packaging (tonnes) baseline</li> <li>• % of single-use plastic to overall packaging (tonnes)</li> <li>• Number of farmers trained in the Primark Cotton Project</li> </ul>
People	<ul style="list-style-type: none"> <li>• Number of audits conducted^</li> <li>• Most frequent non-compliances identified^</li> <li>• Audit rating percentages^ consisting of:               <ul style="list-style-type: none"> <li>• Grade 1: Good systems in place to ensure ethical compliance, limited number of minor issues (%)</li> <li>• Grade 2: Evidence of some good systems in place, however, not achieved full ethical compliance (%)</li> <li>• Grade 3: Ethical compliance not met, with significant and numerous issues (%)</li> </ul> </li> </ul>

Other than as described in the preceding paragraph, which sets out the scope of our engagement, we did not perform assurance procedures on the remaining information included in the Primark Reports, and accordingly, we do not express a conclusion on this information.

## Criteria applied by Primark

In preparing the Subject Matter, Primark has applied the reporting criteria detailed in the ‘About our Reporting’ appendix of the Primark Sustainability and Ethics Progress Report 2023/24 (the “Criteria”).

## Primark’s responsibilities

Primark’s management is responsible for selecting the Criteria, and for presenting the Subject Matter in accordance with that Criteria, in all material respects. This responsibility includes establishing and maintaining internal controls, maintaining adequate records and making estimates that are relevant to the preparation of the Subject Matter, such that it is free from material misstatement, whether due to fraud or error.

## EY’s responsibilities

Our responsibility is to express a conclusion on the presentation of the Subject Matter based on the evidence we have obtained.

We conducted our engagement in accordance with the International Standard for Assurance Engagements Other Than Audits or Reviews of Historical Financial Information (‘ISAE 3000 (Revised)’), and the terms of reference for this engagement as agreed with Primark on 30 July 2024, and subsequently amended on 16 October 2024 and 18 November 2024.

Those standards require that we plan and perform our engagement to express a conclusion on whether we are aware of any material modifications that need to be made to the Subject Matter in order for it to be in accordance with the Criteria, and to issue a report. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risk of material misstatement, whether due to fraud or error.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our limited assurance conclusions.

### Our independence and quality management

We have maintained our independence and confirm that we have met the requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants, and have the required competencies and experience to conduct this assurance engagement.

EY also applies International Standard on Quality Management 1, Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services engagements, which requires that we design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

### Description of procedures performed

Procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. Our procedures were designed to obtain a limited level of assurance on which to base our conclusion and do not provide all the evidence that would be required to provide a reasonable level of assurance.

Although we considered the effectiveness of management's internal controls when determining the nature and extent of our procedures, our assurance engagement was not designed to provide assurance on internal controls. Our procedures did not include testing controls or performing procedures relating to checking aggregation or calculation of data within IT systems.

A limited assurance engagement consists of making enquiries, primarily of persons responsible for preparing the Subject Matter and related information, and applying analytical and other appropriate procedures.

The procedures we performed were based on our professional judgement and included the steps outlined below:

1. Engaging with selected members of the Primark's leadership and senior management to discuss the governance structures around the preparation of the Subject Matter, and the progress made during the reporting year.
2. Meeting with key data owners to understand the processes for recording, aggregating, calculating, and reporting the Subject Matter.
3. Undertaking analytical procedures on the Subject Matter, to:
  - a. assess the accuracy and completeness, and consistency with the established Criteria; and
  - b. make enquiries of management to obtain explanations for any significant differences we identified.
4. Testing, on a sample basis, underlying source information to check the accuracy of the Subject Matter.
5. Recalculating computations performed by management to assess the accuracy of data aggregation for reporting purposes.
6. For the audit rating percentages, on a sample basis, agreeing the reporting audit grade back to management's records and the established Criteria. We did not reperform any underlying audits to determine if the gradings applied were appropriate nor did we perform any procedures to assess the appropriateness of managements' judgement in determining the grading. Our work does not provide any assurance over the appropriateness of the gradings determined by management.

We also performed such other procedures as we considered necessary in the circumstances.

### Conclusion on selected Subject Matter performance data

Based on our procedures and the evidence obtained, we are not aware of any material modifications that should be made to the Subject Matter for the year ended 31<sup>st</sup> July 2024 (or for the 52 weeks ended 14 September 2024 for metrics marked with an asterisk, or year ending 31 December 2023 for metrics marked with an ^), in order for it to be in accordance with the Criteria.

### Use of our Assurance Statement

We disclaim any assumption of responsibility for any reliance on this assurance report or its conclusions to any persons other than Primark, or for any purpose other than that for which it was prepared.

Accordingly, we accept no liability whatsoever, whether in contract, tort or otherwise, to any third party for any consequences of the use or misuse of this assurance report or its conclusions.

**ERNST & YOUNG LLP**  
25 November 2024  
Birmingham

# Glossary

<b>Aii</b>	Apparel Impact Institute. A collaboration of brands, manufacturers and industry associations that have come together to identify, fund, scale, and measure proven climate solutions to accelerate positive impact in the apparel and footwear industry.
<b>Action, Collaboration, Transformation (ACT)</b>	Action, Collaboration, Transformation. An agreement set up in 2014 between 20 global brands and IndustriALL Global Union in pursuit of living wages for workers in textile and garment supply chains. Primark is a founding member of ACT.
<b>AWS</b>	Alliance for Water Stewardship. A global membership collaboration comprising businesses, NGOs and the public sector.
<b>Biofuel</b>	Biofuel is a more sustainable fuel alternative. It is manufactured from used cooking oil, recycled sustainable biomass and other waste streams that can't be used elsewhere. Read more here: <a href="https://corporate.primark.com/en-gb/a/news/behind-the-seams/maersk-partnership-biofuel">https://corporate.primark.com/en-gb/a/news/behind-the-seams/maersk-partnership-biofuel</a>
<b>Care International</b>	Global confederation working to fight poverty and social injustice in the world, with a specific focus on the empowerment of women and girls.
<b>CbD</b>	Clean by Design. An approach to green supply chain efficiency which brings together multinational apparel retailers and fashion brands to improve upon environmental impacts in their factories across the globe.
<b>CDP</b>	Carbon Disclosure Project a not-for-profit charity that runs the global disclosure system for investors, companies, cities, states and regions to manage their environmental impacts.
<b>Circular Product</b>	A definition inspired by our partner the Ellen MacArthur Foundation, circular products are made from recycled or more sustainably sourced materials and designed with the future in mind in line with our Circular Product Standard (CPS). This means they have a longer lifespan when in use and can be recycled into new materials or clothes at end-of-life.
<b>CPS</b>	Our Circular Product Standard (CPS), is a set of design principles that will live and grow within our business as we strive to give our clothes a longer life.
<b>ETI</b>	Ethical Trading Initiative. A leading alliance of trade unions, NGOs and businesses, working together with key stakeholders to promote practical solutions to end the abuse of human rights at work.
<b>Fair Labor Association (FLA)</b>	Fair Labor Association (FLA) is an international network promoting human rights at work. FLA membership includes companies, universities, and civil society organizations.

<b>Fashion industry charter for climate action by the united nations framework convention on climate change (UNFCCC)</b>	<p>The Fashion Industry Charter for Climate Action goes beyond previous industry-wide commitments. Work under the Fashion Industry Charter for Climate Action is guided by its mission to drive the fashion industry to net zero greenhouse gas (GHG) emissions no later than 2050 in line with keeping global warming below 1.5 degrees. The signatories and supporting organisations of the Charter will work collaboratively to deliver on the commitments enshrined in the document. This will be done through Working Groups, which will bring together relevant stakeholders, experts and initiatives in the fashion and broader textile sector. The Fashion Industry Charter for Climate Action, with its Working Groups, will identify and amplify best practices, strengthen existing efforts, identify and address gaps, facilitate and strengthen collaboration among relevant stakeholders, join resources and share tools to enable the sector to achieve its climate targets. The Industry Charter specifies the following overarching areas of work to be further developed by specific Working Groups:</p> <ul style="list-style-type: none"> <li>• Decarbonisation pathway and GHG emission reductions</li> <li>• Raw material</li> <li>• Manufacturing/Energy</li> <li>• Logistics</li> <li>• Policy engagement</li> <li>• Leveraging existing tools and initiatives</li> <li>• Promoting broader climate action</li> <li>• Brand/Retailer Owned or Operated Emissions</li> </ul>
<b>Freedom of association</b>	<p>This is the right for people to come together with other individuals to collectively express, promote, pursue and/or defend their common interests, either formally or informally.</p>
<b>GBVH</b>	<p>Gender-based violence and harassment.</p>
<b>GHG</b>	<p>Greenhouse Gas. The atmospheric gases responsible for causing global warming and climate change. The major GHGs are carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>) and nitrous oxide (N<sub>2</sub>O). Less prevalent – but very powerful – greenhouse gases are hydrofluorocarbons (HFCs), perfluorocarbons (PFCs) and sulphur hexafluoride (SF<sub>6</sub>).</p>
<b>GHG emissions</b>	<p>Emissions of the seven greenhouse gases covered by the Kyoto Protocol – carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulphur hexafluoride (SF<sub>6</sub>) and nitrogen trifluoride (NF<sub>3</sub>).</p>
<b>GHG Emissions (Scope 1)</b>	<p>Direct GHG emissions from owned or controlled sources. For example, the use of non-renewable fuels such as natural gas in boilers, as well as fugitive emissions.</p>
<b>GHG Emissions (Scope 2)</b>	<p>Indirect GHG emissions associated with the purchase of electricity, steam, or cooling.</p>

<b>GHG Emissions (Scope 3)</b>	<p>GHG emissions which are the result of activities from assets not owned or controlled by Primark, but that Primark indirectly impacts in our value chain. The following categories of the GHG Protocol Corporate Value Chain (Scope 3) Standard are included:</p> <p><b>Upstream emissions</b></p> <ul style="list-style-type: none"> <li>• Category 1: Purchased goods and services</li> <li>• Category 2: Capital goods</li> <li>• Category 3: Fuel and energy-related activities</li> <li>• Category 4: Upstream transportation and distribution.</li> <li>• Category 5: Waste generated in operations</li> <li>• Category 6: Business travel</li> </ul> <p><b>Downstream emissions</b></p> <ul style="list-style-type: none"> <li>• Category 11: Use of sold products</li> <li>• Category 12: End-of-life treatment of sold products</li> </ul>
<b>GIZ</b>	<p>German Agency for International Cooperation. An internal enterprise owned by the German Federal Government, operating in many fields across more than 130 countries. As a federal enterprise, they support the German Government in achieving its objectives in the field of international cooperation for sustainable development.</p>
<b>Global Fashion Agenda (GFA)</b>	<p>Global Fashion Agenda is a non-profit organisation that fosters industry collaboration on sustainability in fashion to accelerate impact.</p>
<b>Global living wage</b>	<p>We adopt the definition of a living wage provided by the GLWC. A living wage is the remuneration received for a standard work week by a worker in a particular workplace which is sufficient to afford a decent standard of living for the worker and their family. Elements of a decent standard of living include food, water, housing, education, health, transportation, clothing and other essential needs including provision for unexpected events.</p>
<b>GSM (Global sourcing map)</b>	<p>Primark does not own any factories. The factories featured on the Global Sourcing Map are Primark's suppliers' production sites which represent approximately 94% of Primark products for sale in our stores. A factory is detailed on the Map only after it has produced products for Primark for a year and has become an established supplier. During the first year of production, a factory has to demonstrate that it can consistently work to Primark's ethical standards, as well as meet our commercial requirements in areas such as quality and timely delivery. Each factory entry on the map includes the site address, the number of workers and gender split. We review and update the information on the map once a year, although we may choose to remove a factory between formal updates, if we are no longer using a particular factory as a supplier. The map can be found here: <a href="https://globalsourcingmap.primark.com/">https://globalsourcingmap.primark.com/</a></p>
<b>GLWC</b>	<p>Global Living Wage Coalition. The GLWC is engaged in both research and action on living wage, with the ambition of ensuring a living wage for all.</p>
<b>Goods For Resale (GFR)</b>	<p>Goods acquired by an enterprise for the purpose of reselling them without further processing.</p>
<b>Goods Not For Resale (GNFR)</b>	<p>Items that a business purchases and uses in its day-to-day operations, but does not sell to customers.</p>



<b>HRDD</b>	Human rights due diligence is a management system that allows companies to proactively assess their human rights risks and impacts and take appropriate measures to address them.
<b>IFC</b>	International Finance Corporation. A member of the World Bank Group, advancing economic development and improving the lives of people by encouraging the growth of the private sector in developing countries.
<b>ILGA World</b>	The International lesbian, gay, bisexual, trans and intersex association.
<b>ILO</b>	International Labour Organization. It is part of the United Nations and brings together governments, employers and workers of 187 Member States, to set labour standards, develop policies and devise programmes promoting decent work for all women and men.
<b>ISO 50001</b>	ISO 50001 an international standard developed by the International Organization for Standardization, establishes requirements and provides guidance for the implementation of energy management systems.
<b>KPI</b>	Key Performance Indicators (KPI) are a set of quantifiable metrics used to evaluate and track a performance.
<b>Learning and Implementation Community (LIC)</b>	Learning and Implementation Community (LIC). Is a group of garment brands and retailers committed to improving purchasing practices, together with manufacturers and supply chain partners.
<b>LGBTQIA+</b>	Lesbian, Gay, Bisexual, Transgender, Queer (or Questioning), Intersex, Asexual and more.
<b>Lost Time Injury (LTI)</b>	A lost time injury (LTI) is an injury or illness sustained at work that causes an employee to miss a day or more of work.
<b>Man-made Cellulosic Fibres (MMCF)</b>	Manmade cellulose (MMCFs) are regenerated fibers usually made from the dissolved wood pulp or “cellulose” of trees.
<b>Mono-material</b>	A mono-material refers to a product composed of a single material or fibre. This makes the recycling process much easier, as it reduces the amount of energy required to split or separate various materials.
<b>More sustainably sourced materials</b>	Materials in which efforts are made to help reduce environmental impact in their sourcing. For more information on the fibres used in our clothes, please visit our fibres <a href="#">glossary</a> .
<b>Next generation solutions</b>	This is a commitment led by environmental non-profit Canopy aimed at using more sustainable and lower carbon alternatives to raw materials.
<b>NGO</b>	A non-governmental organization (NGO) is an organization that generally is formed independent from government.
<b>Organisation for Economic Co-operation and Development (OECD)</b>	The Organisation for Economic Co-operation and Development (OECD) is an international organisation that works to build better policies for better lives. They work closely with policy makers, stakeholders and citizens to establish evidence-based international standards and to find solutions to social, economic and environmental challenges.

<b>OECD Due Diligence Guidance for Responsible Business Conduct</b>	The OECD Due Diligence Guidance for Responsible Business Conduct provides practical support to enterprises on the implementation of the OECD Guidelines for Multinational Enterprises by providing plain-language explanations of its due diligence recommendations and associated provisions.
<b>RE100</b>	The RE100 initiative is a global corporate renewable energy initiative bringing together numerous large and ambitious companies that have committed to using 100% renewable power.
<b>Recyclable by design</b>	Decisions made in the design and development stage in the manufacture of a product that make it easier to recycle at the end of its life. This could include components that can be dismantled or removed, or using a mono-material instead of a blended fabric to enable recycling.
<b>Responsible Purchasing Practices</b>	Responsible purchasing means purchasing in a way that enables positive change at the supplier level, so that every part of the supply chain benefits.
<b>SBTi</b>	<p>The Science Based Targets initiative (SBTi), which:</p> <ul style="list-style-type: none"> <li>• Defines and promotes best practice in emissions reductions and net-zero targets in line with climate science.</li> <li>• Provides technical assistance and expert resources to companies who set science-based targets in line with the latest climate science.</li> <li>• Brings together a team of experts to provide companies with independent assessment and validation of targets.</li> </ul> <p>The SBTi is the lead partner of the Business Ambition for 1.5°C campaign – an urgent call to action from a global coalition of UN agencies, business and industry leaders, mobilizing companies to set net-zero science-based targets in line with a 1.5°C future.</p>
<b>Self-Employed Women's Association (SEWA)</b>	A trade union in India which promotes women's rights at work. Primark has worked with SEWA and CottonConnect since 2013 on the Primark Cotton Project. The project supports female cotton farmers to reduce their production costs, adopt more environmentally-friendly farming methods and ultimately increase their earnings.
<b>Single-use plastics (SUP)</b>	Single-use plastics are products which are used once, or for a short period of time, before being thrown away.
<b>Supplier Code of Conduct</b>	Our Supplier Code of Conduct which sets out the standards we expect of our suppliers and partners.
<b>TAFTAC</b>	TAFTAC is the Textile, Apparel, Footwear and Travel Goods Association in Cambodia
<b>TCFD</b>	The Task Force on Climate-related Financial Disclosures. Created by the Financial Stability Board, the TCFD was developed to provide recommendations on the types of information that companies should disclose to support investors, lenders, and insurance underwriters in appropriately assessing and pricing a specific set of risks-related to climate change. Upon delivery of the TCFD's 2023 Status Report, and on request of the Financial Stability Board, the TCFD has now been disbanded.
<b>Tier one factory</b>	Factories manufacturing finished goods.
<b>Tier two factory</b>	Factories which provide materials and services to tier one factories.

<b>United Nations Conference on Trade and Development (UNCTAD)</b>	UNCTAD is a permanent intergovernmental body established by the United Nations General Assembly in 1964.
<b>UNFCCC</b>	United Nations Framework Convention on Climate Change. The United Nations Framework Convention on Climate Change has near universal membership (198 countries) and is the parent treaty of the 2015 Paris Agreement to keep the global average temperature rise this century as close as possible to 1.5 degrees Celsius above preindustrial levels.
<b>UNGPs</b>	United Nations Guiding Principles on Business and Human Rights. These provide a framework for the measures nations and businesses should implement to protect and respect human rights.
<b>UNICEF</b>	UNICEF, the United Nations agency for children. An agency of the United Nations which works to protect the rights of every child, especially the most disadvantaged and those hardest to reach, across the world.
<b>Value Change Initiative (VCI)</b>	The Value Change Initiative is a peer-to-peer learning forum bringing together 500+ climate experts, developing solutions to implement and achieve value chain emission reductions & removals.
<b>WRAP</b>	WRAP is a global environmental NGO transforming our broken product and food systems to create Circular Lining for the benefit of climate, nature and people.
<b>ZDHC programme</b>	The Zero Discharge of Hazardous Chemicals programme. A global initiative that supports the application of sustainable chemistry and best practices in the textile, leather and footwear industries to protect consumers, workers and the environment.
<b>ZDHC MRSL</b>	ZDHC Manufacturing Restricted Substances List. The ZDHC MRSL offers brands and suppliers a single, harmonised list of chemical substances banned from intentional use during manufacturing and related processes in supply chains of the textile, apparel, and footwear (including leather, rubber, foam and adhesives) industries.

