

# TELL US POLICY

Version One, January 2024

## Primark's commitment

At Primark, we aim to do business the right way. We're committed to always acting with integrity. We proudly promote, and aim to protect, a culture of openness, honesty and inclusion that puts responsible practices first.

We're committed to promoting safe and decent workplaces for workers in our supply chain. We know that we're a stronger company when these workers, suppliers and the people who live by the sites which make Primark products feel empowered to speak out and Tell Us about inappropriate, dishonest, illegal or dangerous behaviour they experience. We encourage effective and honest communication at all levels of our supply chain and its communities. Our Tell Us policy is aligned to the UN Guiding Principles on Business and Human Rights (UNGPs) and relevant evolving regulatory requirements that we are aware of.

## WHY should you TELL US?

If you are a worker or supplier in our supply chain or you live by the sites which make Primark products and you become aware of anything you believe to be inappropriate, dishonest, illegal or dangerous, we want you to come forward and express your concerns. We have a confidential and anonymous (unless we must disclose due to legal reasons) system, Tell Us, which enables you to do this. It is covered by this Tell Us Policy. By speaking out, action can be taken to investigate and address issues.

Please be aware that Tell Us does not replace your normal workplace policies and procedures, such as grievance and disciplinary mechanisms, or any trade union or worker committee process that may be available to you.

## WHO does TELL US apply to?

We encourage all workers and suppliers throughout Primark's supply chain and people who live by the sites which make Primark products to speak out and Tell Us. Any type of worker can use Tell Us such as full-time, part-time or fixed-term, casual or agency worker, home worker, secondee, trainee or volunteers.

Colleagues working directly for Primark in any country where we have stores and Primark shareholders, agents, contractors, external consultants, third-party representatives, business partners and sponsors are encouraged to use Primark's Speak Up mechanism. You can learn more here: <https://corporate.primark.com/en-gb/primark-cares/resources/social>.

## WHAT should you TELL US about?

If you believe that inappropriate, dishonest, illegal or dangerous behaviour is taking place, you can raise your concern with the confidence that we will support you. You should report any of the following:

- breaches to Primark's [Supplier Code of Conduct](#), including:
  - forced or compulsory labour or any other indication of modern slavery;
  - non-payment of legally entitled wages and benefits;

- the prevention of joining or forming trade unions or collective bargaining;
- unsafe or unhygienic working environment;
- working hours beyond the legal maximum;
- discrimination, bullying or harassment;
- abusive or coercive behaviour;
- environmental damage; and
- bribery and corruption.
- breaches of any other Primark policies concerning [human rights and ethical issues](#) and the [environment](#);
- unauthorised disclosure of confidential information or other data breaches;
- unauthorised subcontracting of Primark orders;
- fraudulent financial activity; and
- deliberate concealment of any of the above.

Anything not included in the list above can be reported through Tell Us using Option 4 (set out below).

If you are uncertain whether something is within the scope of this Tell Us policy, or if you would like to speak to someone in confidence prior to making a formal report, we suggest you speak to your line manager or supervisor or, if available, your trade union or worker committee representative at your place or work.

### HOW do you raise issues and TELL US?

Please see the below options to raise an issue of concern. **If you or another are in immediate danger, please contact your local emergency services.**

#### *Option 1: Tell your line manager/supervisor*

We suggest you raise your concern with your line manager or supervisor verbally or in writing. If you are concerned about contacting your line manager or supervisor due to the circumstances of the behaviour you have observed, we encourage you to use any of the options outlined below.

#### *Option 2: Where available, contact your local trade union or worker committee representative*


If you feel unable to raise the matter with your line manager or supervisor, or if you feel that your line manager or supervisor has not addressed your concern, where available, you can bring the issue to the attention of your local trade union or worker committee representative.

#### *Option 3: Where available, contact your local worker helpline (See Appendix 1)*

If you are unable to raise the matter with your line manager or supervisor or trade union or worker committee representative, or you have done this and you feel your concern has not been addressed, where available, you can bring the issue to the attention of your local worker helpline identified below at Appendix 1.

**Option 4: TELL US line (Details below and on noticeboards in factories that make Primark products)**

If options 1, 2 and 3 are unavailable to you, or if your concern has not been addressed through the other options, please use the Tell Us phone line, webservice or smartphone app, which are all free of charge, using the details below.

Telephone	Web address	Access Code	QR Code
Bangladesh: 008809610998462  UK: 08000224118	<a href="https://primark.speakup.report/tellus">https://primark.speakup.report/tellus</a>	106502	

If you choose to call the Tell Us phone line, you will hear a recorded message (in most instances with your local language) which asks you to provide the access code unique to Primark, 106502. You are then able to record a voice message detailing your concern.

If you choose to use the Tell Us webservice, you will need to provide the Primark access code, 106502, and will then be given the opportunity to write a message detailing your concern. Text on the webservice is in your local language.

If you choose to use the Tell Us smartphone app, you can scan the QR code and download the app free of charge. You will then need to provide the Primark access code, 106502, and will then be given the opportunity to write a message detailing your concern. Text on the app is in your local language.

Details of the phone number, web address, access code and QR code for Tell Us are also available to you on posters displayed in factories that make Primark products. It is our utmost concern that you can easily access the Tell Us mechanisms and feel comfortable using them. As part of our regular social audit programme of our suppliers' factories, we will check the accessibility of posters and other relevant information material as well as your understanding of the mechanism.

The records of the concerns raised with Primark will be retained in accordance with applicable laws. In relation to the Tell Us phone line, a transcript of your voice message or an audio recording is made.

Your report will be addressed in accordance with our Tell Us procedures, set out below.

**WHAT will happen next if you contact Primark using the Tell Us system?**

You will receive a unique case number. If you go back into the Tell Us phone line, webservice or smartphone app and use this number, you will be able to listen/read the acknowledgement of your report (after 7 days), any requests for more information and any update on the status of your concern.

We aim to acknowledge your report within seven days. We will then conduct an initial assessment, as part of this, you may be asked to provide additional information about your concern, depending on what is found, will determine the action to be taken and the timescales involved.

You will be informed of the outcome of any investigation and actions planned or taken and reasons for such actions (subject to confidentiality requirements). We ensure the persons who are responsible for investigating Tell Us grievances are independent and impartial.

If you are unhappy with the response you receive at any point, remember you can go to any of the other contacts detailed in this Tell Us Policy set out above. We are committed to ensuring any such issues are handled fairly and properly.

### **HOW will we protect you if you contact Primark using the Tell Us system?**

#### **From repercussions**

We will not tolerate retaliation against anyone raising a concern: any individual raising a concern should be protected from adverse repercussions, retaliation or detriment. Should you feel that there is any detriment to you or your job, as a result of raising the concern, this should be reported immediately using the Tell Us phone line, webservice or smartphone app.

#### **Your identity and Privacy**

We hope you feel able to speak to us openly. If you wish to be completely anonymous, which is up to you and is possible using our Tell Us phone line, webservice or smartphone app. Please share any information that you think will help us to address your issue. Don't worry if you have forgotten something, you have the option to contact us again, or you can request that we contact you directly to discuss your issue.

If you do disclose your identity, we will take all reasonable steps to keep your identity private and confidential. We will only make your name known to those people who need to know it in order to investigate the allegation or otherwise as required by law. Any personal data that identifies you or another person obtained as part of any concern raised under this Tell Us Policy will only be used for the purposes described in this Tell Us Policy and in accordance with the Privacy Notice at Appendix 2.

Regardless of whether you opt for anonymity, we never include information about workers in our supply chain in our published reports on grievances which would lead to their identification.

#### **OTHER**

Unless otherwise provided for by law, this Tell Us Policy does not form part of your contract of employment and does not provide the basis for any such contract with Primark; we may amend this Tell Us Policy at any time.

## APPENDIX 1

## LOCAL WORKER HELPLINES

Name	Country	Telephone and/or Website
<p>Amader Kotha</p> 	Bangladesh	08006666666
<p>MUDEM Worker Support Centre</p> 	Turkey	<a href="https://iscidestekmerkezi.org">https://iscidestekmerkezi.org</a>
<p>RMG Sustainability Council (RSC)</p> 	Bangladesh	<p>Safety Complaints: 08801769969000</p> <p>General Enquiries: 08801766695900 0880241081863-6</p>
<p>Ungal Kural</p> 	India	1-800-8333-12

## APPENDIX 2

### TELL US – YOUR PRIVACY

For the purposes of European data protection legislation, Primark is the data controller with responsibility for personal data you submit through our Tell Us phone line, webservice and smartphone app.

#### Your personal data

We use the personal data submitted under our Tell Us Policy only for the purposes of investigating allegations of inappropriate, improper, dishonest, illegal or dangerous behaviour (“inappropriate behaviour”) under our Tell Us Policy and in compliance with applicable laws. This notice tells you about the information we collect when you report inappropriate behaviour and how that information is used and shared within Primark.

#### What personal data do we process?

If you report an issue through the Tell Us phone line, webservice or smartphone app we collect whatever personal details you include in your report about you or anyone you identify in your report. We do not require you to leave your name. We do encourage you to identify yourself, as concerns raised anonymously tend to be far less effective and if we do not have enough information, a full investigation may not be possible.

You may include personal information falling into special categories, sometimes called “sensitive personal data”. This term includes information relating to such matters as racial or ethnic origin, religious beliefs, physical or mental health, trade union membership, sexual orientation, information regarding sexual life, biometric data, genetic data, criminal records and information regarding criminal offences or proceedings.

If you are the subject of a report or named in a report, we will endeavour to inform you promptly, unless doing so might prejudice the investigation or we are prohibited from doing so by law.

#### How do we use this data?

Voice reports submitted through the Tell Us phone line are briefly recorded and then transcripts created both in original language and English. All transcripts and reports received through the Tell Us webservice and smartphone app, irrespective of country of origin, are stored in a case management system and sent to Primark.

We use data submitted to us for the purposes of reviewing the report and, where appropriate, investigating allegations made. Our use of this data is generally necessary for our legitimate interests in relation to these purposes and we put in place appropriate measures to protect the individuals involved.

Where your report includes special categories of personal data and/or personal data regarding criminal offences or proceedings, generally speaking our use of this data is necessary for our legitimate interests (as described above) and:

- In respect of the use of special categories of personal data, necessary for substantial public interests and/or necessary for the establishment or defence of legal claims; and

- In respect of information relating to criminal offences or allegations, necessary to detect or prevent unlawful acts.

### Sharing your data

Any reports submitted through the Tell Us system that relate to ethical issues will initially be directed to the Primark Ethical Trade team to deal with according to the procedures set out in the Tell Us Policy.

Other reports will typically be passed to the relevant team within Primark to assist with the appropriate investigation.

In order to keep an overview of any trends or areas of concern where further training or other steps are needed, all reports will be anonymised and collated into summary reports by Primark for quarterly review by the Primark Director of Risk and Compliance.

### How long do we keep your data?

Initial voice recordings are deleted once transcripts are created. The transcripts of reports and reports received through the Tell Us webservice and smartphone app will be retained within the Tell Us system for the period of time to investigate and once a case has been 'closed', for a further period of three years (unless a longer period is required under applicable laws). All identifying information is then deleted and only a statistical record of the type of report, the location and the outcome of the investigation are retained for internal reporting purposes.

### Where is your data held and transferred?

Reports submitted through the Tell Us phone line, webservice and smartphone app will be stored on our supplier's servers in the Netherlands, Europe. Your data will also be accessed by Primark in the UK and Ireland and then allocated for investigation to the most appropriate business. This means your data will be transferred to the UK, Ireland and the Netherlands and to the relevant investigation team, wherever they are based.

### Your Rights

You can ask us at any time to provide you with a copy of your personal data. If you think the personal data we hold about you is inaccurate or incomplete, you can ask us to correct it or complete it. In some circumstances you also have the right to object to our use of your data and the right to ask us to restrict our use of your data or to delete it. There are some exceptions to these rights however. For example, it will not be possible for us to delete your data if we are required by law to keep it or if we need to use it in order to establish or defend a legal claim.

If you wish to access your personal data or exercise any of your rights, you should contact the Primark Data Protection Team on [dataprotection@primark.ie](mailto:dataprotection@primark.ie) in the first instance. If you have a concern about the way we handle your information you have the right to complain to your local data protection supervisory authority.