# CORPORATE

## PRIMARK ANIMAL DERIVED MATERIAL POLICY – Non Food Product[1]

Primark shares the concerns of our customers towards the fair and ethical treatment of animals and we believe all animals should be treated humanely. **We are also committed to reducing our business impact on the environment.**[2] As part of our Primark Cares initiative, we are committed to a better, more sustainable future.[3] We take our responsibility seriously and will keep moving towards a better future for people, planet and animals.

### Our Position

As we increase the use of more sustainable materials across our product range, we consider several aspects when considering our natural and synthetic material selections. This includes environmental, social, quality and animal welfare. We have committed to significantly increasing the use of recycled materials across all our products, and we encourage the same for animal derived materials.

Traceability and transparency of all our materials is paramount and we endorse the use of recognised industry standards/certifications where available to achieve this.

We know we cannot increase our sustainable material selection and improve animal welfare practises alone. Collaboration with leading industry experts, our supply network and other brands is key to our programme. Primark actively supports the development of recognised animal welfare standards and certifications.

### Key Principles

All suppliers in our supply network are required to comply with this policy.

Animal derived materials used in our products must comply with the following;

- Have full chain of custody to confirm the species and origin of the full supply chain of these materials.
- Not come from any species as listed on CITES[4] or IUCN Red List as Critically Endangered, Endangered or Vulnerable[5]. (This also includes animal **and** plant species)
- No animal must be specifically slaughtered to produce any non-food Primark branded products
- The sourcing all animal derived materials must be underpinned by the five freedoms of animal welfare

### Scope

The scope includes all materials used in non-food Primark branded products

[1] Previously known as Primark Animal Welfare Statement.
[2] More information in Primark's Environmental Policy. https://primark.a.bigcontent.io/v1/static/Environmental-Policy
[3] Primark Cares – A Better Future. https://www.primark.com/en/a-better-future
[4] CITES. Convention on International Trade in Endangered Species https://cites.org/eng/disc/species.php
[5] IUCN. International Union for the Conservation of Nature Red List. https://www.iucnredlist.org/

## Five Freedoms

It is important that the sourcing of any animal derived materials is underpinned by these internationally recognised Five Freedoms:

1. **Freedom from Hunger and Thirst** – by ready access to fresh water and a diet to maintain full health and vigour.

2. **Freedom from Discomfort** – by providing an appropriate environment including shelter and a comfortable resting area.

3. **Freedom from Pain, Injury and Disease** – by prevention or rapid diagnosis and treatment

4. **Freedom to Express Normal Behaviour** – by providing sufficient space, proper facilities and company of the animal's own kind.

5. **Freedom from Fear and Distress** – by ensuring conditions and treatment which avoid mental suffering.

## Prohibited Materials

Our suppliers must not source materials for Primark products which contain any of the following:

- No animal must be slaughtered specifically to produce any non- food Primark products
- Any material from any ***endangered species***, defined as those which appear on the Convention on International Trade in Endangered Species (CITES) (see www.cites.org/ for list of species) or the IUCN red list as Critically Endangered, Endangered or Vulnerable (www.redlist.org/).
- Any species harvested directly from the wild
- Real fur[6] - including farmed fur
- Any material obtained from live skinning (e.g. reptiles) or live boiling
- Astrakhan (Karakul) or any other leather/skin products which the product of unnatural abortions
- Angora Rabbit fibre
- Vicuna or Guanaco fibre
- Any animal derived bone or horn
- Any Coral
- Any materials made in or originating from certain territories as communicated in writing by Primark to our suppliers

## Material Compliance requirements

Our suppliers may source the following materials for Primark products, only if the requirements listed below are met and comply with the key principles listed on the first page of this policy;

**Leather**

- Skins (with or without hair on) from domesticated livestock species sourced as a by-product of the meat industry
- Must not be from aborted animals e.g. slink/karakul.
  Must not be obtained from live skinning (e.g. reptiles) or live boiling
- Primark is a member of the Leather Working Group.[7] We encourage our suppliers to source leather from LWG medal rated tanneries.

[6] Suppliers should perform a visual check on all faux fur production to ensure that it does not contain real fur. Please refer to guidance in the BRC Faux Fur Guideline https://brc.org.uk/media/398594/bc-18-005-voluntary-guidelines-on-artificial-faux-fur.pdf

[7] The Leather Working Group/LWG is an international organisation made up of stakeholders across the leather supply chain, working to promote environmental best practice within leather manufacturing and related industries. https://www.leatherworkinggroup.com/

**Wool**

- All wool must come from farms which rear sheep to the highest welfare practices
- Wool must only be sourced from sheep that have not been mulesed
- Our approach to responsible sourcing of wool is based on a risk-based approach:
  Low Risk Sources: Suppliers sourcing from low risk countries are required to provide import / export documentation proving Country of Origin and country of destination.
  Wool from South Africa, China and South America is considered lower risk as these sources suffer much lower instances of blowfly and mulesing is not commonly practiced
- Australian Wool: Wool from Australia is the highest risk as the use of surgical mulesing is wide spread. Suppliers are required to provide an AWTA certificate to verify the mulesing status.
  We only accept wool categorised as Non Mulesed (NM) or Ceased Mulesed (CM).
- We encourage the use of certified recycled[8] wool or wool that is fully certified to the Responsible Wool Standard with full chain of custody (RWS).[9]

**Cashmere**

- All cashmere must come from farms which rear goats in accordance with responsible animal welfare practices
- Any shearing or combing of goats for cashmere must be performed in such a way as to minimise any animal discomfort.
- We encourage the use of certified recycled cashmere

**Mohair & Alpaca**

- All mohair must be sourced from farms and suppliers that are fully certified to the Responsible Mohair Standard (RMS) with a full chain of custody
- Alpaca must only be sourced if it is fully certified to the Responsible Alpaca Standard (RAS) with a full chain of custody. This standard is due to be launched publicly in 2021

**Feather and Down**

- Must be sourced as a by-product of the meat industry
- Must not be obtained from the live plucking of birds
- Must not be sourced from birds that have been force fed or from birds used in the production of Foie Gras
- 
- All feather and down must be sourced in accordance with either one of the following standards;
  - Responsible Down Standard (fully certified with a full chain of custody)[10]
  - IDFL Down Standard (IDS)[11]

[8] Post-consumer textile waste is preferred. GRS and RCS certification standards are accepted. https://textileexchange.org/standards/recycled-claim-standard-global-recycled-standard/

[9] The Responsible Wool Standard is a voluntary standard owned by Textile Exchange that addresses the welfare of sheep and the land they graze on. https://textileexchange.org/standards/responsible-wool/

[10] The Responsible Down Standard (RDS) aims to ensure that down and feathers come from animals that have not been subjected to any unnecessary harm https://textileexchange.org/standards/responsible-down/

[11] The purpose of IDFL Down Standard (IDS) is to verify that down and feather products are ethically sourced https://www.idfl.com/services/audits-certifications/

**Silk**

We encourage the use of recycled or organic silk

**Other animal derived materials**

- All other animal derived materials must be sourced in accordance with this policy and relevant details must be provided on an Animal Derived Material Declaration form

## Animal Testing

We do not conduct, support or condone the use of animal testing that is not required for safety or quality by law. We avoid the use of animal testing wherever possible and do not maintain any testing facilities.

### Primark Beauty[12]

Primark's own branded cosmetics have been approved by the Leaping Bunny Programme, the international gold standard for products that are cruelty free.

For more information about the Leaping Bunny Programme and Cruelty Free International, please visit http://www.crueltyfreeinternational.org/

## Supplier Responsibilities

Primark suppliers are required to share this policy with their supply network and communicate our requirements for animal derived materials. In addition, suppliers must;

- Declare the full supply chain of these materials, including raw material origin.
- Work with their supply network to ensure materials in our product comply with this policy and perform due diligence checks.
- Test materials for composition[13], and submit a 3rd party lab report via the Supplier Testing Portal.
- Products must be clearly labelled with the full composition.
- It is recommended that all faux fur is tested in bulk to verify the fibre composition to minimise the risk of real fur contamination or substitution
- Discuss any known contraventions to this policy with their Primark contact.

**If you have any concerns concerning the risk or origin of an animal derived raw material, it is recommended that you request that the supplier completes the "Animal Material Declaration Form" see appendix.**

[12] Suppliers must refer to the Primark Beauty Testing Manual for full requirements on Primark branded cosmetics.
[13] Testing must be conducted in line with Primark's Testing Manual requirements.

## Labelling

Where parts of animal origin are used, the material type must be clearly labelled. Synthetic materials made to look like animal products must be clearly labelled as faux on the product description and care label to avoid confusion. The below phrases should be applied to all applicable products:

| **PRODUCT APPLICABILITY** | **WORDING** |
|---|---|
| All non-textile animal products, e.g. leather or shell | CONTAINS NON-TEXTILE PARTS OF ANIMAL ORIGIN |
| All faux fur products | THIS PRODUCT DOES NOT CONTAIN REAL FUR |

Fibre content labelling must be in compliance with the EU Directive 96/74/EC as mandated across all Primark Testing Manuals.

## Continuous Improvement

We will work with our suppliers to respect the humane treatment of animals. We will work with expert organisations to understand and promote best practice in animal welfare standards and traceability systems in our supply chain.

Primark will review this policy regularly to ensure it is current, fit for purpose and appropriate to our business.