

Primark Chemical Management Programme:

Statement on Progress and Roadmap 2015/2016

1.0 Introduction

Primark prioritises the health and safety of the environment, employees and customers globally including our supply chain partners in the entire product lifecycle.

Supporting our ethical trade programme, Primark has in place an active programme to drive environmental sustainable manufacturing practices in our global supply chain.

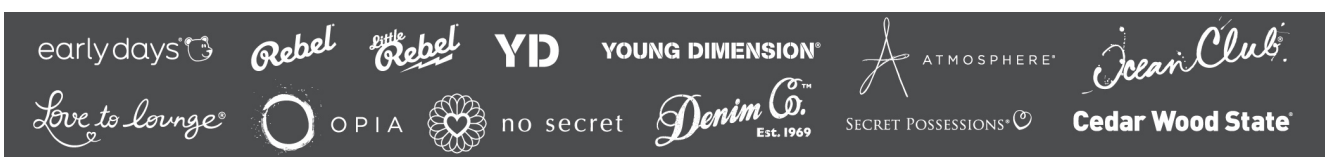
As part of our Environmental Sustainability Programme, we have strict chemical management requirements for our products that comply with EU and US legislation. We also look for opportunities to go beyond EU and US legislation, adopting the precautionary principle to reduce the environmental impact of the textile manufacturing processes throughout our supply chain. Our suppliers agree to adhere to our standards as part of the terms and conditions of doing business with us. We have a factory focused programme to provide formal training, resources and support to our suppliers and their factories on Primark's standards in order to bring about sustainable change throughout the manufacturing process.

Our Chemical Commitment and Chemical Management Programme focuses on the integration of environmental management knowledge, standards and tools into our upstream supply chain partner facilities and production processes. Our approach is to empower our partners to guarantee the integration of our objectives.

Whilst we have a rigorous programme in place to ensure our products and processes are in conformance to our requirements, we are committed to the present and future development and publication of these resources by and on behalf of our fellow brands and the industry.

Our objective is to have full traceability from all Primark supply chain partners of upstream manufacturing, product and chemical inventory information for every point in the supply chain.

We are committed to helping bring about industry wide change, and believe that this requires collaboration with industry experts, other brands and organisations to facilitate a common set of tools and standards. This is why, beyond actively engaging with our



suppliers and their factories, we also work with a number of organisations including Greenpeace’s Detox campaign, ZDHC and the Sustainable Apparel Coalition (SAC).

This progress report provides an overview of our activity to date and outlines our next steps.

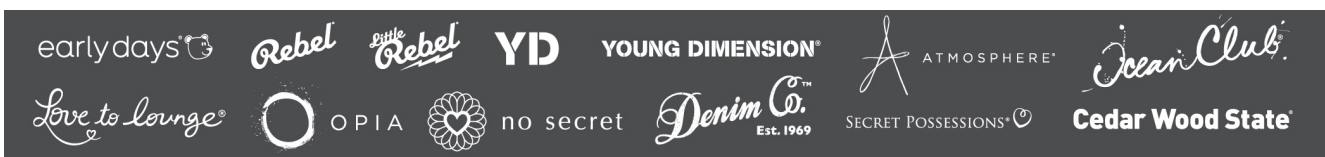
1.1 Disclosure

We track and map all our Tier 1 suppliers’ factories, monitoring their compliance to the standards outlined in our Code of Conduct, which they must adhere to as a condition of doing business with us.

We also have a Tier 2 programme that monitors compliance to the standards outlined in our Code of Conduct in wet processing facilities, including washing and dyeing, on chemical management and the use of natural resources, managing closely how chemicals are used and verifying outputs. This programme is in operation in key sourcing countries, Bangladesh and China, where we also partner with other organisations to affect change, including Solidaridad and IFC, focused implementation programmes in wet processing facilities.

Primark discloses supplier data relating to environmental performance in a number of forums for example via the IPE platform and the HIGG Index.

We have long-term relationships within our supply chain. These strong, long-term relationships with our supply chain partners reflect the strength of our purchasing policies, ethical and environmental programmes.

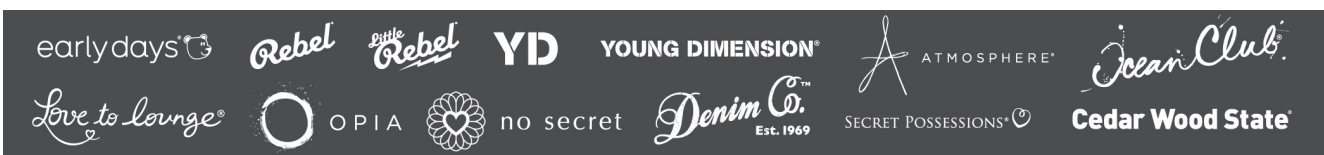


1.2 Our Commitment

Our original commitment published in 2014 to phase out hazardous chemicals from the supply chain contained the following goals.

i.	What have we committed to?	Status
ii.	Phase out of the use of 11 priority chemical groups from the supply chain by 2020	On-going
iii.	Carry out investigation into current compliance regarding the use of APEOs and Phthalates and make the findings publicly available on our website	Completed
iv.	Ensure only APEO free formulations are used within our production*	On-going
v.	Ensure only PFC free formulations are used within our production*	On-going
vi.	Ensure only Phthalate free formulations are used within our production*	On-going
vii.	Strengthen our supplier contract language to ensure only APEO and Phthalate free formulations are used within our production	Completed
viii.	Identify other chemicals beyond the priority 11 for phase out	Completed
ix.	Publish an updated copy of Primark's Restricted Substances List	Completed
x.	Publish disclosure of wastewater discharges via IPE public platform	Completed
xi.	Publish case studies of chemical substitutions via the Supsport.org platform	Completed

* Total ban issued in 2015 on the use and presence of APEOs, PFCs and Phthalates



1.3 Our Chemical Management Programme

In 2015, Primark expanded the scope of the original DETOX programme to provide for a more holistic approach to the goal of clean manufacturing processes. The programme differences are below:

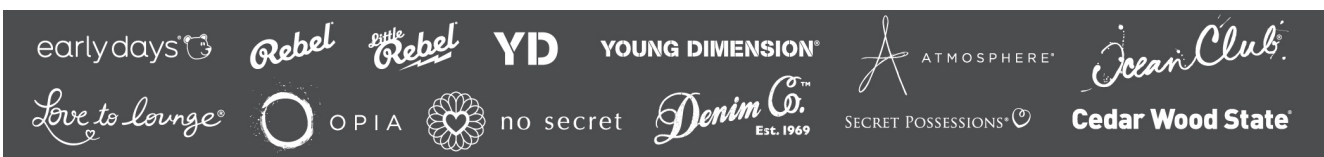
2014-2015		2015-2016
Focus on delivering Detox commitments.	→	Our chemical management work has now expanded and matured to cover additional scope and objectives.
Product RSL based on EU legislation.	→	Our Product RSL now lists additional chemicals beyond the scope of EU and US legislation.
Priority focus on the prevention of water pollution.	→	We have expanded our original priority to focus on <ul style="list-style-type: none"> • MRSL compliant chemical inventory, • Clean air, water and waste emissions, • Health and safety in manufacturing processes, • Management standards adoption/implementation.
Priority focus on apparel and footwear production.	→	We have expanded our original priority focus to all production, including apparel, footwear and beauty.
Recognition of the importance of brand and industry collaboration.	→	Primark now actively supports implementation through brand and industry initiatives.
Priority focus given to Tier 1 suppliers.	→	We have moved to an integrated approach, with Tier 1 suppliers and Primark working together to implement the programme to Tier 2 and beyond.
Programme priority on investigation pilots in China, India and Bangladesh	→	We are now implementing our programme within our global supply chain, across all product areas.
Priority focus on elimination of intentional use of MRSL substances in products.	→	Our programme now requires the elimination of intentional use and contamination.



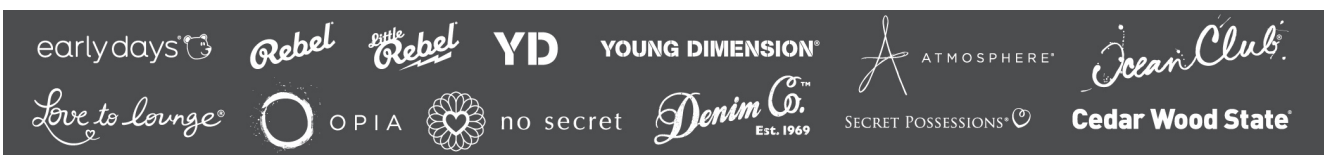
1.4 2015/2016 Implementation Timeline

This shows the full timeline of Primark’s programme to achieve the goals of the Detox Commitment and clean manufacturing processes to date.

2015	
MAR	<ul style="list-style-type: none"> - Primark’s Annual progress report published - Greenpeace Detox Catwalk published – Primark achieved Leadership Status.
APR	<ul style="list-style-type: none"> - APEO Elimination focus - Full APEO and Phthalate ban - communication and follow-up - ZDHC membership application
MAY	<ul style="list-style-type: none"> - Engagement with APEO risk suppliers
JUN	<ul style="list-style-type: none"> - ZDHC membership approved - Commencement of Primark’s Environmental Sustainability Steering Committee (ESSC) - Bangladesh pilot undertaken with support from STS and BV - Environmental Sustainability Controller, Charles Dickinson joins the team
JUL	<ul style="list-style-type: none"> - Continuation of Bangladesh pilot
AUG	<ul style="list-style-type: none"> - Bangladesh pilot results and remediation - Uploading of test results on IPE DETOX platform (on-going) - Internal communications on ZDHC and Charles Dickinson’s Board of Directors position - Phase 2 China pilot initiated at 4 additional dye sites focussing on PFCs
SEP-OCT	<ul style="list-style-type: none"> - ESSC engagement with chemicals to internal buying/sourcing teams - PFC focused investigation with Huntsman and BV - Chemical Management training in India for suppliers - PFC elimination focus – communication, investigation and follow-up
NOV	<ul style="list-style-type: none"> - PFC investigation results evaluation and remediation - Product and Manufacturing RSLs updated & added to supplier portal and on the Primark website
DEC	<ul style="list-style-type: none"> - Engagement with suppliers on PRSL and testing portal - Direct engagement with outerwear, swimwear, performance wear, umbrella and shower curtain suppliers on PFCs - Internal training sessions on PFCs to all buyers and technical product managers with the support of chemical experts



	<ul style="list-style-type: none"> - PFC guidance resource training to internal teams - Full PFC ban communicated to suppliers
2016	
JAN	<ul style="list-style-type: none"> - Bangladesh pilot published on website - China pilot focused on PFCs published on website - Publication of case study on 4-Chloroaniline substitution on website - Follow up training with internal teams on PFC training - Follow up training with suppliers on PFC ban - Chemical management updates included to supplier workshops
FEB	<ul style="list-style-type: none"> - Environmental Sustainability Manager, Emma Hamilton-Foster joins the team - Fibre to fabric training with internal buying teams (chemical management topic integrated) - Year 3 (Phase 1) Primark Sustainable Cotton Programme completed – significant reduction of chemicals and water usage - Additional factories engaged in PaCT factory improvement programme - Bangladesh in-country factory assessments of chemical management
MAR	<ul style="list-style-type: none"> - Environmental Sustainability Manager joins Bangladesh team - Ethical team training on MRSL and MRSL Guidelines - Bangladesh wet processing mapping with audit programme - Quality and Sourcing teams training on MRSL - Key line product suppliers workshops on MRSL and MRSL Guidelines - Systems update to capture traceability of Tier 3+ and fibre information
APR	<ul style="list-style-type: none"> - Updated Supplier Code of Conduct with MRSL commitment - Updated Environmental Policy with strengthened chemical management commitment - MRSL Guidelines published and distributed to 100% supply chain - Beauty suppliers engagement and training on MRSL Guidelines - China in-country supplier workshop with IPE - Upstream raw material testing programme launched
MAY	<ul style="list-style-type: none"> - Further internal training to Quality, Sourcing, Ethical and buying teams on MRSL Guidelines - Chemical Management software selected - SAC and ZDHC collaboration in Copenhagen – MRSL conformance process, data management, audit and CMS finalisation - Chemical product screening methodology agreement - 100% supply chain engaged on MRSL implementation process



2.0 Manufacturing Restricted Substances List (MRSL)

Where there is credible scientific evidence that a chemical in a formulation or recipe related to Primark production may result in harm to human and/or environmental health we take action to eliminate the use of the chemical and replace it with suitable alternatives. Alternatives must be safer, affordable, achieve quality performance and be environmentally sustainable.

What chemicals have we banned?

1. Alkylphenols and Alkylphenol Ethoxylates
2. Phthalates
3. Brominated and chlorinated flame retardants
4. Azo dyes
5. Organotin compounds
6. Per and Poly fluorinated Chemicals
7. Chlorobenzenes
8. Chlorinated solvents
9. Chlorophenols
10. Short Chain Chlorinated Paraffins
11. Heavy metals

In addition to the list above we have also banned an additional five substances, including PAHs and glycol ethers.

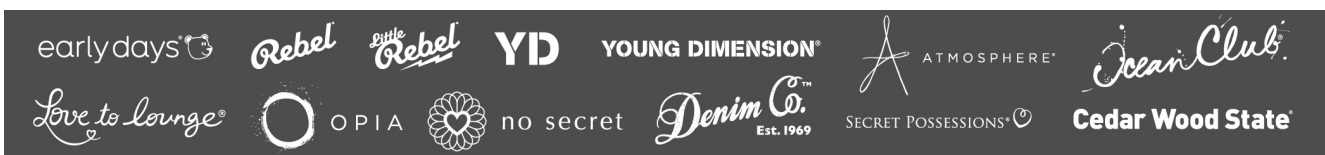
Future:

<http://www.roadmaptozero.com/fileadmin/layout/media/downloads/en/ResearchList.pdf>

Primark supports and has adopted the ZDHC MRSL developed on behalf of ZDHC member brands and manufacturers committed to the elimination of specific chemicals in the apparel and textile industry.

The ZDHC brands comprise 25-30% of the industry and now, in partnership with the BEPI (Business Environmental Performance Initiative), 1700 brands.

Adopting this approach ensures alignment on the identification and elimination of chemicals for our shared supply chain, and allows us to apply collaborative pressure on the chemical manufacturers to develop alternative solutions. We have found this method



to be very successful in driving real progress and not overburdening or providing conflicting messages to our supply chain partners.

As mentioned, Primark support the ZDHC MRSL as it lists only those chemical substances which are used in the supply chain and for which alternative safer chemistries with acceptable performance are available. This means the supply chain can source and implement substitutions for the entire ZDHC MRSL now. We strongly advise that only through collaboration and practicality will we be able to scale adoption and implementation required to meet our 2020 goal in full.

In addition to our own targeted research we have used the ZDHC Research List to update our MRSL and implementation roadmap. Our suppliers were issued with the MRSL in 2015 and it remains in place as a complete ban on all these substances from use, discharge and presence in product.

The ZDHC research list contains those chemical substances for which alternatives that are safer and provide acceptable performance are not yet available, and identifies these substances where it is necessary to establish alternatives.

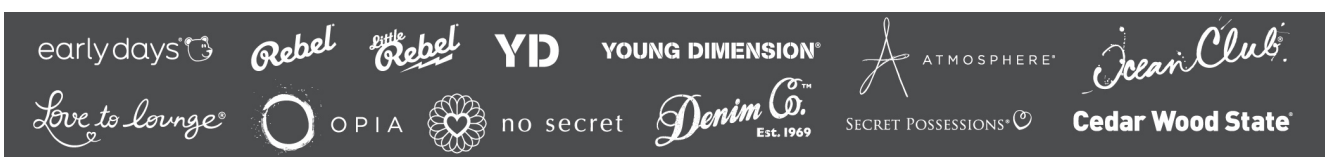
The ZDHC MRSL already covers more than the 11 priority chemical groups. In addition to this Primark has eliminated all PFCs (short and long chain) from December 2015. We have actively manage product in delivery to ensure this ban is rigorously enforced.

Primark enforces implementation of the MRSL and transparency of the elimination of the DETOX 11 priority chemicals groups, in addition to the 5 additional chemical groups currently on the ZDHC MRSL, through the process described below.

2.1 MRSL Implementation

Primark focuses on the delivery of environmental risk elimination and delivery of other positive business benefits through front-end chemical selection and product (incoming material and chemical formulations) procurement.

Our experience has demonstrated the efficient elimination or control of environmental and human health hazards associated with chemical use through implementation of this approach using our MRSL implementation programme. For more information, see MRSL Commitment and Guidelines Implementation, p.13.



3.0 Product Management

Primark has a product management programme in place to ensure the elimination of intentional use and presence of our MRSL chemicals in production. We maintain a strict stance to our upstream supply chain partners on the responsibility for MRSL compliance in relation to incoming chemical products and raw materials, and discharges.

3.1 PFC Elimination

Primark banned all PFC analytes in 2015. We have issued and reinforced communications on this specific ban, conducted targeted investigations and screened for compliance in key product areas.

A specific challenge we have encountered in our site assessment process has been the presence of this chemical in inventories and production lines at request of other brands. Our approach remains one of complete phase-out from all factory production, however this is proving challenging to achieve across all suppliers for the reason mentioned above. We continue to drive industry collaboration on this issue in order to drive the chemical out of the market, and focus the sector on looking at the economic viability of the growing range of suitable alternatives.

3.2 Phthalate Elimination

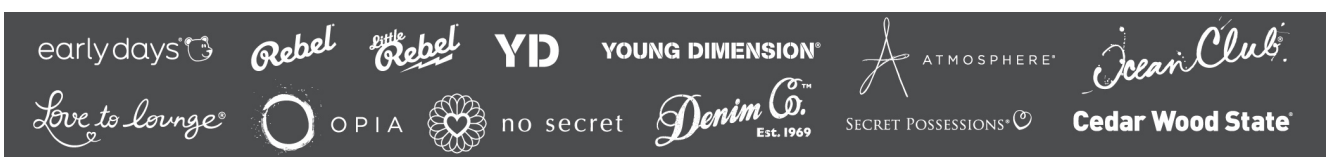
Primark had in place a programme to ban phthalates prior to signing Greenpeace's DETOX Commitment. Our Product RSL (PRSL) details the standard required on this specific chemical and monitoring is managed through the supplier portal and finished product testing process. In addition to our targeted investigations we require suppliers to ensure phthalates are not present in supplier inventories, and screen emissions accordingly.

3.3 AP/APEO Elimination

Primark enforced a ban on all Alkylphenol and Alkylphenol Ethoxylates in 2014. We take a holistic approach to the elimination of this chemical as our pilot investigations have shown contamination in incoming water and inconsistencies in legislation banning the use of these in certain countries.

3.4 Upstream Material Testing

In order to ensure compliance of Primark's production processes to our MRSL standards we will shortly commence the testing of raw material for our finished product suppliers. We aim to



empower our finished product suppliers to take ownership over their upstream supply chain by monitoring incoming product conformance to our shared chemical requirements.

In AW16 production our raw material testing programme represents 43% of our business by volume. Our main countries of testing are China, Bangladesh, India and Turkey.

Primark adopts the product testing method with the lowest detectable limit, and requires all testing laboratories to report according to this and not to a reporting or 'not-detected' limit. In order to do this we invest a larger up-front resource by agreeing on a testing programme only with specific labs that are certified and qualified to undertake such tests.

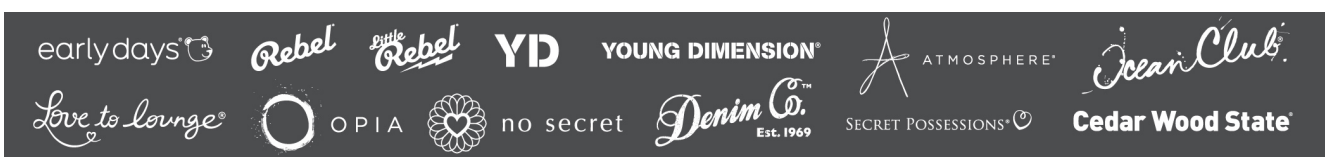
Primark manage failures to intentional use and contamination. Any failure to APEO, PFC or Phthalates are considered in breach of the Supplier terms and conditions and managed accordingly.

We do not support publishing case studies on these findings as they are not developed on behalf of an academic or professional institution, merely observations and findings from our own activities. In the absence of a suitable verification process for this information we share to inform internal decisions and industry collaboration forums only.

3.5 Finished Product Management

Primark manages compliance of finished product through the PRSL and our 'Portal' system. The Primark Portal is an interactive web based platform that interfaces between the Primark Quality/Compliance team and our suppliers. Its main use is for our suppliers to request testing as per Primark's requirements. The resulting reports are then shared via the portal with both suppliers and Primark, and stored in a database.

Within the Portal there is a chemical management section which offers technical guidance on APEOs, Phthalates and PFCs specifically developed by Primark. Also readily available is the Primark PRSL and MRSL and other supporting materials including guidance and training tools. An alert system allows us to instantly communicate new requirements or documents with our entire supply base.



3.6 Other MRSL and Future Chemical Elimination

Through our chemical management programme our internal product management teams have developed a much more detailed understanding of our supply chain partners including the sourcing of product in their upstream supply chains, and the quality of finished products. Increased knowledge of raw material procurement and chemical inventory data assists our internal teams in identifying changes in quality and performance of finished products.

The upstream material testing activities will evolve in 2016-2017 to be owned by the finished product manufacturers and coordinated by the buying and sourcing teams. We plan to prioritise additional chemical groups and plan to focus on Short-Chain Chlorinated Paraffin's (SCCPs) and Chlorophenols in our next season.

Our elimination roadmap reflects our priority to ensure implementation and compliance of our production supply chain.

3.7 Recycling

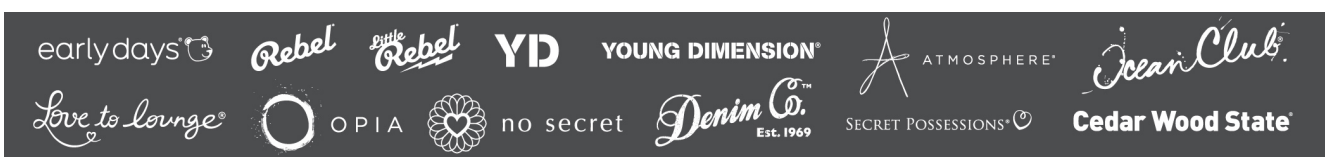
Primark is committed to reducing the environmental impact of products at every stage of their life, which is why it has engaged with a number of different programmes and partners to reuse and recycle its products.

In Europe Primark has been donating unsold merchandise to the Newlife Foundation since the charities inception in 2010. These goods are recycled in an environmentally sound manner, and the profits support the work of the Newlife Foundation for Disabled Children, including the establishment of Europe's first dedicated birth defects research centre in 2012.

In the US Primark donates unsold merchandise to the charity K.I.D.S/Fashion Delivers. K.I.D.S/Fashion Delivers distributes the merchandise Primark donates through a network of over 1,000 community partners across America and around the world, who in turn redistribute the donations to families and individuals in need and recovering from disasters. Any merchandise that can't be redistributed is recycled in an environmentally sound manner. The partnership started in 2015 when Primark opened its first US store.

For more information on both programmes:

<http://www.primark.com/en-ie/our-ethics/environment/recycling-clothing>



4.0 Process Management

4.1 Chemical Use Reduction

Primark prioritises the elimination of **use** of chemicals. In site visits and factory remediation we mandate the exclusion of chemical products or reduction of use where it is absolutely necessary for it to be used. An example of this is where we have integrated water resistant fibres into home products to achieve water repellence as opposed to water proofing to unnecessary quality standards.

While Primark buys no cotton direct from producers, its long-term ambition is to ensure all the cotton in its supply chain is sourced sustainably. So in 2013 Primark used its relationships to bring together agricultural experts, CottonConnect, and the Self-Employed Women's Association to create 'Primark's Sustainable Cotton Programme'. The three year programme trained 1,251 female smallholder farmers in India and 1,200 smallholders in China to produce more environmentally sustainable cotton by reducing fertiliser, pesticide and water usage, increase cotton quality and ultimately improve their livelihoods through increased income.

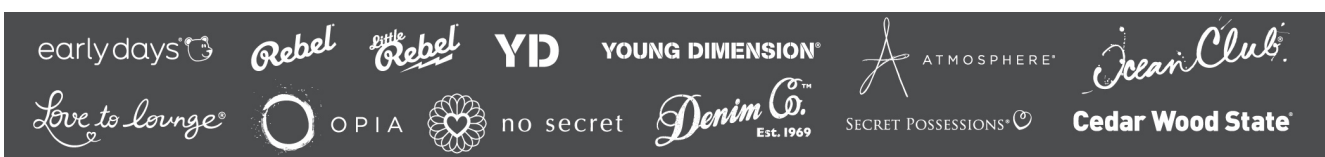
In May 2016 we completed Phase 1 of the Primark Sustainable Cotton Programme. Results included a substantial decrease in the use of chemicals, both pesticide and fertilisers, and the adoption of natural alternatives. There was also an overall reduction in water usage.

Specifically, in Year 2 in India there was a 53.5% reduction in pesticide use, 13.5% reduction in fertiliser usage and 27.9% decrease in water usage.

In May 2016 Primark announced the extension of this programme to another 10,000 farmers in the same region in India. For more information on this programme and developments see [here](#).

4.2 Emissions

Primark support the right-to-know and values the impact of emissions disclosure on chemical elimination where it is legally mandated. Currently a selection of core suppliers have published on the IPE DETOX platform. In addition to this Primark has engaged priority suppliers in the reporting of emissions data on the IPE PRTR platform. We aim to expand this exponentially in 2016-2017. In April 2016, we had a representative from IPE present at an in-country workshop in Shanghai on the PRTR platform to Tier 1 and 2 suppliers.



We are further developing our relationship with IPE to ensure our Chinese supply chain Partners, focusing on wet processing sites, are reporting to the PRTR platform in alignment with their own on-going environmental programme to ensure preventative management of their emissions. Special attention is applied to the auditing and remediation efforts to facilities associated with central wastewater treatment, where we aim to overcome the issues associated with lack of ownership.

After our initial achievement of wet processing sites publishing wastewater results on IPE in our earlier pilots, our efforts have been focused on the implementation of the MRSL and chemical management structure in our wet processing sites. We are continuing work with our supply chain towards the goal of emissions disclosure.

4.3 MRSL Commitment and Guidelines Implementation

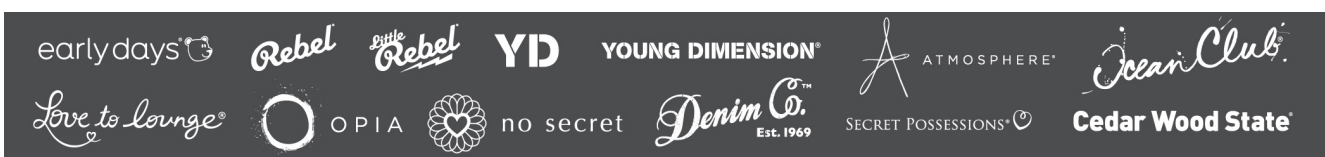
In 2016 we distributed our MRSL Guidelines resource to our upstream supply chain partners with the requirement to sign and return an MRSL commitment. The purpose of this commitment is to ensure all our direct suppliers (Tier 1, Tier 2 and mills) understand and commit to our MRSL and chemical management requirements and ensure amplification of this process to their upstream supply chain. We require all partners to maintain an up-to-date resource declaring upstream supply chain partners and their associated commitments. This process is designed to guarantee transparency and alignment on our chemical management requirements. Our experience of this and the mind-set shift it has instigated with our supply chain is very positive.

Within a week of distributing our MRSL Guidelines we received over 100 signed commitments from suppliers.

Common feedback in this process is the provision of [REACH](#) compliance certificates and/or industry certifications such as [OEKO-TEX®](#) or [bluesign®](#). We encourage the adoption of such standards, as they support good chemical management, however we do not accept production on this basis alone and through constant dialogue we ensure suppliers understand the additional rigour needed to adhere to our MRSL.

4.4 Chemical Management Assessment and Remediation

Primark has had a dedicated environmental management resource in Dhaka, Bangladesh, since February 2016. In addition to the Tier 1 and Tier 2 auditing programme which covers 100% of our suppliers and looks at environmental management in association with ethical and social criteria, we have rolled out a targeted chemical audit programme.



An overview of our assessment process we implement is as follows:



Our hazard based approach to supplier assessment is applicable to all suppliers and priority is applied to factories based on processes (wet processing), volume and strategic relationship.

At present our assessment process is implemented in a staged approach; in the future we plan to report via different channels on statistics demonstrating improvements and challenges.

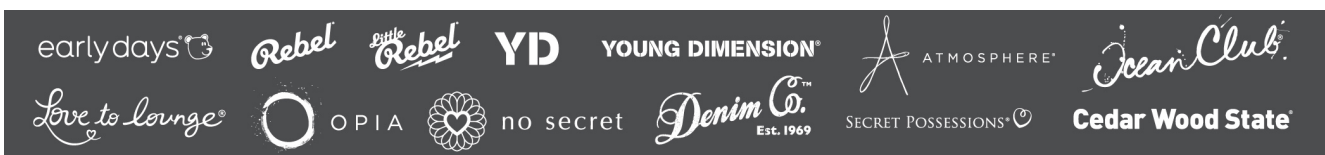
4.5 Inventory Screening Methodology

Primark not only considers intentional use of chemicals within Tier 1 and 2 suppliers, but also the use and presence of chemicals in the entire product supply chain including contamination in resources and product.

To support the capture of chemical inventory data and ensure the safe procurement of chemical products we have been strongly involved in the development of, and have now approved, three different but complimenting solutions which will become available to us during 2016.

1. An industry chemical registry with supportive MRSL conformance process
2. A shared supplier profile and inventory management software
3. A 3rd party chemical product screening programme

We look forward to sharing more information and implementation results in the next annual report.



5.0 Targeted Projects

5.1 China I:

For our first chemical investigation launched by Primark, we selected 6 facilities: 3 dyeing mills, 1 dyeing and printing and 2 garment washing mills. The aim was to better understand the current practices in term of chemical management and the level of hazardous chemicals used in the processes. All substances detected were below the 1ppm level (and below 0.005 ppm for PFCs, Chlorophenol and Chlorobenzenes). While being very low levels, they also confirmed the presence of high priority chemicals for phase out which helped us to adapt our chemical strategy accordingly.

5.2 China II:

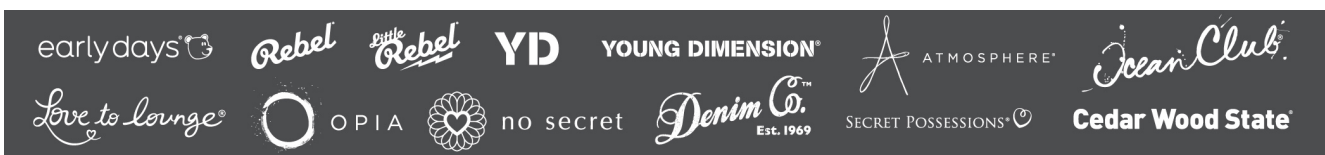
Using the knowledge gained during our first Pilot, we selected 5 additional mills, linked to the same suppliers as the mills involved in Pilot I. Again the chemicals targeted were found below the 1ppm level. While those results were encouraging they highlighted the need in increasing our communication towards our suppliers as some of the substances were still present.

5.3 China III:

Before launching a communication campaign on PFCs within our supply chain and our own business, we decided to set up a PFCs focus pilot in China with 3 of our outerwear suppliers 'mills. The results have shown waste water before treatment didn't have any traces of PFCs but some traces (below 1ppm) of APEOs and Phthalates had been detected, highlighting the widely spread use of those 2 chemicals.

5.4 India

In 2015 we launched a series of workshops across India (Delhi, Tirupur and Bangalore) to explain our PRSL requirement and our 2020 target in details, share some chemical management best practices and present the IPE platform and how to upload testing results on it. 79 of our India suppliers attended those workshops and we received very positive feedback.



Primark Sustainable Cotton Programme

Primark has been working hard for the last decade to improve the rights of workers and the lives of the people working within our supply chain. Cotton, a natural fibre, makes up a large proportion of our clothing range and in some regions cotton is grown on large-scale industrial farms. However, it is mostly grown on small farms in low-income countries, where knowledge of the most up to date and environmentally friendly farming practices is often limited.

That is why, in 2013, Primark partnered with agricultural experts, CottonConnect, and the Self-Employed Women's Association to create the 'Primark Sustainable Cotton Programme'.

The programme is designed to introduce sustainable farming methods, improve cotton yields and increase the farmers' income. During 3 years, 1251 female smallholder farmers from 5 villages in Gujarat, India, have been trained through classroom sessions and in-field trainings to adopt more sustainable farming methods.

The programme aims to reduce the environmental impact of cotton production while increasing female farmer's income via reducing the amount of water, fertilisers and pesticide used, increasing yield. These new practices have a direct impact on the input cost and their new agricultural knowledge allows them to produce more and better quality cotton, leading to an increase in their profits which benefits all their families.

The results have exceeded all our expectations and that is why over the next six years, an additional 10,000 female farmers will be taken through the programme, with the first seeds being sown by new trainees in April 2016.

By working only with women, Primark trains farmers that are often excluded from trainings and educational programmes. The Primark Sustainable Cotton Programme gives these women formal training, improves their livelihood, empowers them and helps narrow the gender inequality gap in their community.

In May 2016 Primark received the prestigious 'Environmental Initiative' Award for the [EDIE Environment and Energy awards](#) in recognition of our work on this project over the past 12 months.

earlydays®

Rebel

little Rebel

YD

YOUNG DIMENSION®

A

ATMOSPHERE®

Ocean Club®

Love to lounge®



OPIA



no secret

Denim Co.™
Est. 1969

SECRET POSSESSIONS®

Cedar Wood State®

5.5 Bangladesh

Following the detection of Phthalates in mills involved in different type of garments, we decided to launch a programme focusing on T-shirt printing mills. Indeed substances used for some printing techniques may contain Phthalates. The findings of this pilot have been particularly interesting as only heavy metals were found in effluent, and phthalates only found in high levels in incoming water.

Partnership for Cleaner Textile (PaCT)

In 2011, Primark started a partnership with Solidaridad, the International Finance Corporation (IFC) and the Embassy of the Kingdom of Netherlands, to support textile wet processing factories in Bangladesh in implementing sustainable and resource efficient practices.

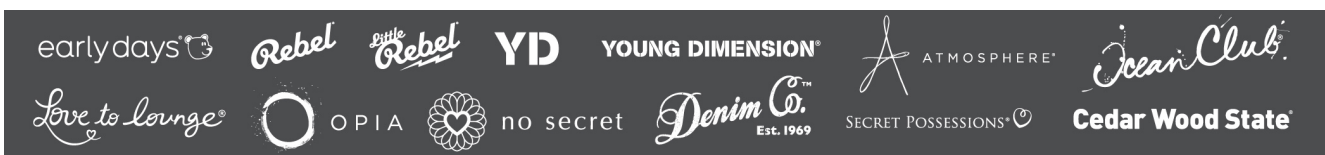
Our Cleaner Production programmes provide training to mills and vertical suppliers on how to make improvements to their washing, dyeing and printing operations. The training helps them to reduce the water, chemicals and energy they use and ensure that waste water is treated properly.

Primark and 8 other apparel brands are working together on this programme to bring systemic change in the Bangladesh apparel wet processing sector and increase awareness on water scarcity in the region.

The PaCT team work closely with the involved factories to create a personalised action plan with key performance indicators based on each factories current practice and previous year's performances. Divided in short, medium and long term actions this action plan provides factories with pragmatic solutions to reduce their environmental impact with real monetary benefits. An evaluation is done 6 months after the publication of the Assessment Report and its presentation to the mill's team.

The programme also includes in-house training and documentation for buyers and designers presenting different alternatives to high water, chemical and resource consuming technologies and processes.

During 2015/2016 Primark nominated 12 wet processing factories to be involved in this programme and will select 8 others within its supply chain to participate in the programme before 2016 end.



6.0 Engagement

6.1 Partner Communications

We maintain an open and constructive communication channel with all our suppliers. Our environmental sustainability team is well educated on both the chemical properties and elimination process, and they support our suppliers with the implementation of our RSLs and chemical management system in a positive and proactive manner. We are also supported by external specialists as required for training purposes.

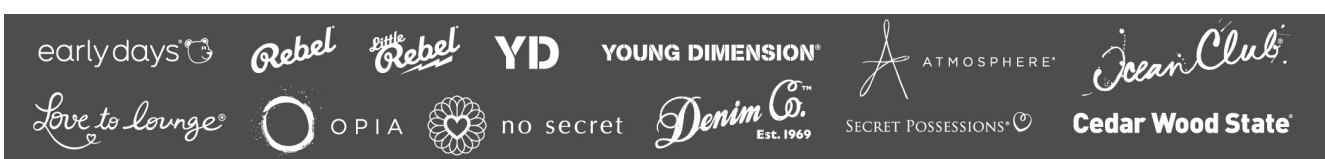
6.2 Internal Team Engagement

We have an on-going internal programme for interacting with and sharing responsibilities with our internal teams on chemical management. Our buying and sourcing teams actively participate in our training sessions on both the RSL's and upstream supply chain partner requirements. Some of the training sessions completed in 2014/2015 include:

- Farm to fibre training
- PaCT Factory Improvement and process and technology selection training
- Chemical Elimination training (using the Primark APEO, Phthalates and PFCs guidance material – what it means and how to use it)
- Targeted PFC elimination and product management training
- MRSL implementation training
- Key lines engagement training
- Fibre selection training
- Responsible Cotton Sourcing Programme

During 2015 we organised several internal PFCs sessions followed by some one-to-one meetings. For those sessions, specific types of products were selected and the attendees chosen accordingly: outerwear, swimwear, sportswear, umbrellas and shower curtains. The objective of this training was to explain to our technical managers, buyers and designers working with these categories of products what PFCs are, why we banned them and how to manage the switch to safer alternatives.

A specific PFC Guidance document was created to be used by our teams during their day to day dialogue with our suppliers.



The results of this training were very well received and we saw a clear improvement in the understanding and level of engagement from our teams in reaching our elimination goal and more consistent communication with our suppliers on our chemical requirements.

6.3 Workshops

Primark provides in-country workshops for suppliers focused on chemical management. The most recent of these was in Shanghai where we presented to finished product suppliers and their upstream mills including dye houses, printing mills, wash facilities and most importantly their chemical suppliers. Each supplier was represented by their senior leadership and technical management. We had representatives speaking on the day from [Huntsman](#), [STS](#) and IPE. Topics covered included the MRSL and implementation of the chemical management processes within our guidelines and the requirement to be reporting to IPE PRTR.

In 2016/2017 our agenda features a series of workshops in China, Bangladesh, India, Turkey and UK.

6.4 Case Studies

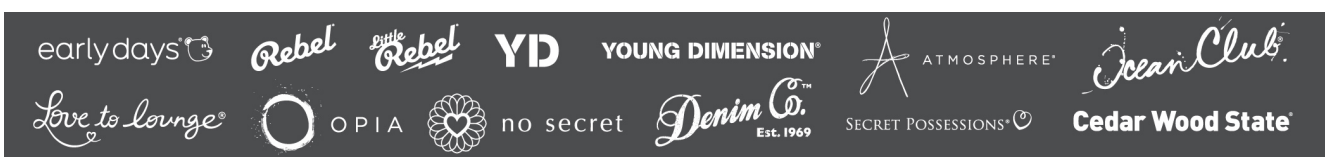
As per our commitment we have published a number of case studies via the [Subsport platform](#). Primark now maintains a collection of case studies. These detail evidence of elimination, challenges and achievements which assist our internal and external stakeholders in collective learning.

Whilst we have not published these on our website, we distribute them in various forums. Three specific examples are as follows:

1. Elimination of PFCs in shower curtains (*finished product supplier*)
2. Best practice chemical inventory management (*fabric mill*)
3. Best practice chemical management system (*jewellery and accessories supplier*)

6.5 Management Software

Primark has spent considerable time and resource evaluating the most suitable solution to secure a data and process management solution for us in collaboration with our upstream supply chain partners specific to chemical management.



In addition to the system currently in place which manages supplier information including audit and approval reporting, we have selected a system to facilitate transparency of chemical inventory including the ability to provide compliant sourcing of chemical products. We plan to begin rolling this out to our suppliers in July 2016.

We are working on other system solutions with our industry partners also through the ZDHC and SAC groups, to ensure a common process for assessment and sharing of factory data relating to environmental management.

7.0 Collaboration

7.1 ZDHC

We have and will continue to actively contribute to the development of standardised testing methods to support the MRSL so that there are methods with known accuracy and precision are available globally to support transparency of elimination.

Primark openly shares upstream supply chain information and lessons learned within the controlled context of the ZDHC forum. On the website and in working groups we discuss challenges and successes, tools and resources, and partner with other brands in delivering implementation with maximised return to shared supply chain partners or industry stakeholders.

7.2 Sustainable Apparel Coalition (SAC)

Since 2015, Primark has been a member of the SAC, a coalition of more than 150 members, collectively committed to improving supply chain sustainability in the apparel and footwear industries.

Together the members have created an online tool: the HIGG Index, which allows brands, retailers and factories to assess themselves against sustainable criteria and to then anonymously compare their scoring with the rest of the industry.

Primark completed its first Brand Environmental Module in 2015 and will continue to monitor its own improvement annually while engaging with its suppliers, increasing our supplier connections on the tool and strengthening our implementation programme.

We are currently working closely with SAC to converge assessment tools and ensure a streamlined chemical management agenda.

