

PRIMARK®

Modern Slavery Statement 2024

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Introduction

We're pleased to share our Modern Slavery Statement which covers our programmes and approach to mitigating against modern slavery for financial year 2023/24.

Modern slavery is one of the most prominent risks within global supply chains. According to the [United Nations \(UN\)](#) there are an estimated 27.6 million people in forced labour globally.

Our commitment to our customers, stakeholders and the people making our products is clear. We ban the use of child and forced labour anywhere in the Primark supply chain. We have very strict governance in place including policies, procedures and training programmes for our suppliers, business partners and our employees to ensure that our standards are being met and to help individuals raise issues and concerns. We do this in line with our [Supply Chain Human Rights Policy](#) and our [Supplier Code of Conduct](#) which are based on the [United Nations Guiding Principles \(UNGPs\)](#) and Organisation for Economic Co-operation and Development (OECD) [Due Diligence Guidance](#).

In this statement, we outline how our commitment is put into practice through our wider risk assessment and due diligence processes.

This statement was endorsed by the Primark Chief Executive and Leadership Team in February 2025.

Paul Marchant
CEO, Primark

February 2025

About Primark

Primark is an international retailer employing more than 82,000 colleagues¹ across 17 countries² in Europe and the US. 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. 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.

While we don't own the factories that produce our products, we know we have a responsibility to ensure the people who make our products can access fair and safe working conditions, free from modern slavery.

Primark is part of Associated British Foods plc (ABF), and for the purposes of the UK Modern Slavery Act 2015, it is also covered by the [ABF Modern Slavery Act Statement](#).



1. Data as per ABF's financial year end of 14 September 2024.
 2. Figures based on our [Global Sourcing Map](#), updated in November 2024.
 3. As of end of December 2024.
 4. Tier one factories manufacturing finished goods in our supply chain.
 5. Figures based on our [Global Sourcing Map](#), updated in November 2024.
 6. Tier one factories manufacturing finished goods in our supply chain.
 7. Tier one factories manufacturing finished goods in our supply chain.
 8. Data runs to 31 December 2023. This number has been publicly assured by EY.

Governance

Governance and accountability

We have a comprehensive governance system to oversee sustainability and ethics, including modern slavery, 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, ABF, provides further oversight. Relevant topics related to ethics and sustainability, including modern slavery, which are material at the ABF level, are discussed with the ABF Group CEO and Board both annually and when appropriate.

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 Leadership Team. Solutions are also discussed with the ABF Group CEO and Board when necessary.

Communicating our progress

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

- We publish this Modern Slavery statement annually. All previous statements can be found on our [website](#).
- We publish further details on our efforts on our website, within our annual [Primark Sustainability and Ethics Progress Report](#) and within the [ABF Responsibility Report](#).
- As a member of the [Ethical Trading Initiative \(ETI\)](#) we are assessed regularly on our due diligence.
- NGO KnowTheChain benchmarks our performance in addressing the risk of modern slavery; their feedback can be [read here](#).
- We provide regular updates directly to our shareholders, stakeholders and regulators as relevant.



Over 130

Ethical Trade and Environmental Sustainability team members across our 10 key sourcing markets



Primark Cares

Our work focusing on improving labour standards in our supply chain has been implemented through our Ethical Trade programme for over 15 years. Our [Primark Cares](#) strategy, launched in 2021, aims to build on these foundations and accelerate our commitment towards becoming a more circular and more sustainable business. 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 consists of commitments stretching until 2030 that are underpinned by four key elements:

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

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

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

1. Create financial resilience

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

2. Promote equal opportunities for women

we will strengthen the position of women through skills development and addressing their barriers to progression by 2030.

3. Improve health and wellbeing

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

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

More information on Primark Cares and our work to embed the strategy within our business and supply chain can be found in our Primark Sustainability and Ethics Progress Report 23/24. Click below:



Policies and advocacy

Our policies and approach

We have a set of policies covering our standards and commitments for how we and our suppliers conduct business. We regularly review these policies which align with industry standards, laws, and regulations, and in some cases go beyond this. We also have mechanisms that give individuals the ability to safely raise any issues and concerns around modern slavery.

Our Supply Chain Human Rights Policy

Our [Supply Chain Human Rights Policy](#) outlines our commitment to respect the human rights of the people in our supply chain and sets out our risk-based, worker-centric approach to due diligence, which is underpinned by the United Nations Guiding Principles on Business and Human Rights (UNGPs).

The policy sets out:

Our commitments and contribution to the UN Sustainable Development Agenda, and in particular Sustainable Development Goal 8 on Decent Work – i.e. to promote sustained, inclusive, and sustainable economic growth, full and productive employment, and decent work for all.

Our commitment to ensuring effective grievance mechanisms are present and in place throughout our supply chain.

How we enact the UNGPs, the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, and the OECD Due Diligence Guidance for Responsible Business Conduct.

Our Supplier Code of Conduct

Our [Supplier Code of Conduct](#) translates our human rights commitments into specific requirements all suppliers must comply with.¹

It is based on the UN's International Labour Organization's (ILO) Core Conventions and Fundamental Principles, including the elimination of forced labour. The scope of our Supplier Code of Conduct covers our full supply chain including goods for sale, services (such as service providers, logistics and transportation) and goods not for sale (those goods that Primark uses for its own consumption). Our suppliers are responsible for compliance with the Supplier Code of Conduct in their whole supply chain and Primark has audit rights with unrestricted access.

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

We require that all our suppliers' factories communicate our Supplier Code of Conduct to all employees, and that all worker contracts are in the workers' own language. We translate and publish our Supplier Code of Conduct in 44 languages on our website.

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

Employment is freely chosen:

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

Auditing suppliers against our Supplier Code of Conduct

Our social audits are managed by our global ETES team, one of our most important resources in identifying risks. We have more than 130 team members working across 10 key sourcing countries. They understand local regulations and are trained to identify risks and work with suppliers and factory management to drive workplace improvements. They also engage directly with workers in our supply chain and our external partners to understand the risks and root causes of such risks. They have been recruited from a range of different organisations including other companies, development agencies and civil society. This on-the-ground engagement adds an important additional layer of insight and visibility into working conditions and human rights risks within our supply chain.

Primark's audit programme is governed by Primark's Head Office. We bear the full cost of these audits, which are undertaken by Primark or a third-party on our behalf, and most of which are unannounced. Where any issues are identified through an audit, a corrective action plan (CAP) is put in place, which is agreed by the site management during the audit closing meeting, and which that outlines any areas for improvement. In cases where we have identified high or salient risks, we may implement additional due diligence activities. These could include the social impact programmes that fall under our Primark Cares commitments, such as our My Life programme for vulnerable migrant workers in India.

Any new factory producing goods for resale must undergo a social audit as part of our onboarding process. Primark conducts a pre-supply audit of all potential supplier factories during which we check adherence to the standards laid out in our Supplier Code of Conduct, a prerequisite of making any Primark product. No orders are placed until the factory has been audited and approved. Once a factory is approved to produce Primark products, Primark continues to assess whether the factory meets the expectations in the Supplier Code of Conduct by conducting audits at least once a year.

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.

Policies and advocacy continued

Anti-bribery and corruption policy

As part of the ABF group, we've adopted [ABF's Anti-Bribery and Corruption Policy](#) and are committed to maintaining the highest standards of ethics and compliance wherever business is conducted, in line with all relevant legislation and local laws. The policy is also incorporated into our Supplier Code of Conduct and prohibits any form of bribery, including facilitation payments.

All Primark employees, whose day-to-day activities fall within the realm of our anti bribery and corruption policy must complete online training on anti-bribery and corruption when they join the company, and at regular intervals during their employment. The ABF Legal team deliver face-to-face and virtual training with our teams located in our sourcing countries, which allows for direct discussion and enables a forum where specific questions or concerns can be raised and addressed. We also require relevant third-party service providers and partners – regardless of size, location or type of service provided – to undergo our training programme where our assessment indicates there is a need. Primark's suppliers are also required to put in place their own anti-bribery and corruption procedures within their own businesses.

Our approach to whistleblowing within Primark

We are proud to promote and protect our culture of trust, accountability and respect here at Primark along with our values of Caring, Dynamic and Together. It is really important to us that our colleagues feel empowered to tell us if they are aware of anything they believe to be inappropriate, illegal or dangerous, and that we maintain open and honest communication throughout all levels of the business.

We provide dedicated Speak Up phone lines and email addresses supported by dedicated Speak Up officers both within Primark and ABF. We encourage all colleagues working for Primark in any of our businesses in any country and in any capacity to Speak Up, including colleagues at all levels, directors, officers, part-time and fixed-term workers, casual and agency workers, seconded workers and volunteers. This grievance

mechanism allows for anonymous reporting and confidentiality is ensured, unless required otherwise by law, and persons bringing a complaint will be protected from adverse repercussions, retaliation or detriment.

Where appropriate, we also encourage third parties who are associated with Primark to use Speak Up, including shareholders, suppliers, agents, contractors, external consultants, third-party representatives, business partners and sponsors. Our Speak Up policy can be found on our website [here](#).

Further information on our approach to grievance mechanisms in our supply chain can be found on p17.

Advocating for effective policy and legislation on modern slavery

We support legislation and policy which aims to prevent and address the global risks of modern slavery. Such measures can support company-level efforts in tackling modern slavery and create a level playing field where all companies are taking the right steps.

Legislation to address modern slavery has been significantly strengthened. In addition to the UK Modern Slavery Act (2015), several important legal developments have emerged that address modern slavery and forced labour. These include the US Uyghur Forced Labour Prevention Act and the EU Forced Labour Regulation, along with broader legislative initiatives on responsible business conduct and due diligence at a regional and national level.

We engage with policymakers to share our experiences and learnings and support effective government-led measures. In the period under review, we have:

- Engaged with policymakers in the UK on addressing forced labour risks in global supply chains, including the Department for Business and Trade, and the Foreign Commonwealth and Development Office and the Office of the Prime Minister's Office.
- Engaged in discussions on CSDDD, CSRD and the proposed EU Forced Labour Regulation through industry groups including EuroCommerce and Policy Hub.



Due diligence to identify risk



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 to 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. Stakeholders are defined as including anyone who is affected by the company's operations, value chain or products, including employees, workers, trade unions, community members and their representatives.¹
- 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 insights 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. Interviewing of workers also forms part of Primark's social audit programme.

Using multiple different sources of information, we gain a more holistic understanding of risks. Where there is a severe and systemic risk of forced or child labour or other severe human rights abuses, we work with experts to conduct heightened or enhanced due diligence.

We have outlined our approach on our due diligence to identify risks in more detail in our [Modern Slavery Statement 2023](#) (p21) and continue to implement this approach.

We conduct specific risk assessments covering all clauses in our Supplier Code of Conduct annually. In 2023, this assessment focused on the most significant countries of origin for our products. We looked at risks against our Code of Conduct on a country-by-country basis as we recognise that the legal, political and cultural composition of each country will vary and may present different risks to workers' in the workplace.

The starting point for our risk assessment is an external view of risk. To establish this view, we sought advice from a range of external stakeholders: NGO, Multi-Stakeholder Initiative, and specialist consultants were involved in our risk assessment process.

Combining these points of view gave us a holistic external view of risk, scored on a scale from one to ten, with ten being highest risk. This scoring was applied to all clauses of our code of conduct for our top sourcing countries. Alongside this, we analysed twelve months of our own audit data and used this to compare with the external abstract theory of risk from our stakeholders. Again, the audit data was ranked one to ten with ten being the highest risk or occurrence. Using our audit data and expertise of our regional teams we then identified how risks manifested against each clause of our code of conduct in each of the top sourcing countries.

Our regional teams were then able to use this in their review of plans for the coming year to ensure that we are investing in the right programmes to have the most impact for workers.

1. EU Corporate Sustainability Due Diligence Directive <https://eur-lex.europa.eu/eli/dir/2024/1760/oj/eng>

Due diligence to prevent and mitigate risks

Our approach to the prevention and mitigation of risks

Our approach to due diligence to address the risks of modern slavery in our supply chain is tailored to the context and nature of the specific risks, the underlying root causes of the risks, the infrastructure, and resources available. We also seek to apply lessons learnt from precedent and best practice, and the expertise of our local team on the ground, to inform us as to the most valid and appropriate due diligence method to apply.

We use a range of appropriate measures, including corrective action plans resulting from audits and assessments, often in partnership with expert organisations and stakeholders. 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. See p13 for more detail.

A core part of our approach focuses on developing and implementing programmes for workers to help them understand and exercise their rights, in partnership with local experts on the ground. We know that partnering with local experts is important if we are to develop effective programmes built around the needs of the workers that deliver the impact that works for them. Many of our partners are grassroots civil society and development organisations and these partnerships have been built and fostered over the past decade and span our key sourcing markets.

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

More details on our programmes can be found on p27.

Training and awareness-raising programmes

Training and awareness-raising programmes are both important tools within our business to help guide decision-making and to support the implementation of our programmes to address risks within the supply chain.

We deliver training directly to our employees through dedicated training seminars designed to promote awareness and mitigate and prevent risks. Highlights from the year under review include:

- Primark trained 1253 colleagues across the business on various modules related to responsible purchasing practices.
- 320 suppliers and 455 colleagues from Buying and Merchandising also received specific training on costing methods to identify and ringfence labour costs as part of our on-going commitment to responsible purchasing practices.

Spotlight on responsible recruitment

Recruitment and hiring practices are one of the most common ways in which workers in all sectors can be exploited and are at risk of modern slavery. The ILO includes deception and debt bondage within the recruitment process as indicators of forced labour. We have taken the following steps to address this risk:

- We support the Employer Pays Principle (EPP), which means that no worker in our supply chain should pay for their job, and any costs associated with their recruitment must be paid for by the employer. This is stated in our Supplier Code of Conduct.
- Our suppliers are permitted to use agency and contract workers provided they are afforded the full rights as set out in the Supplier Code of Conduct. We provide training to suppliers to ensure they are aware of the risks and our requirements.

- If recruitment fees are identified as having been paid by workers, suppliers are expected to provide remedy in the form of reimbursement of fees to workers.
- We may conduct additional due diligence on suppliers that hire migrant and contract or agency workers. Migrant, contract and agency workers can be more vulnerable to recruitment practices that may result in forced, indentured and bonded labour. See p20 for further detail.



Due diligence to prevent and mitigate risks continued

My Journey, India

Primark's 'My Journey' is a training and awareness programme focused on identifying and addressing the risks of modern slavery and forced labour in the hubs of South India and North India.

The programme trains all staff and workers in a factory who are involved in the recruitment and hiring of workers. It helps them understand the potential risks of forced labour involved in these processes, and how they can help to address them, for example, by making sure that all new recruits have contracts that they understand and that they have not paid recruitment fees to secure their job. The programme first launched in 2019 in South India which is a hub for spinning and fabric mills and many workers migrate there from different regions across India. Workers in this region, both local and domestic migrants, have been identified as vulnerable and at risk of forced labour. Recruitment and hiring practices are a key source of these risks.

The programme expanded to manufacturing hubs in Delhi, North India in 2024. Migratory patterns to this region differ to those of South India, but similar risks of modern slavery and forced labour arising from recruitment practices have been identified.



Transparency and traceability of our supply chain

Selecting suppliers that meet and share our standards

Our global supply chain is large and diverse and our tier one supply chain spans 17 countries. We have implemented several measures for supplier selection and ongoing due diligence, and we regularly monitor and update this process.

Unauthorised subcontracting is strictly prohibited and constitutes a breach of our contracts with suppliers and factories. We recognise that workers in unauthorised factories may be exposed to significant violations of our Code of Conduct. To mitigate this, we have clearly outlined what constitutes unauthorised subcontracting in our prevention policy, which has been communicated to all suppliers.

If unauthorised subcontracting is suspected, we will conduct an unannounced assessment of the relevant factory or factories to confirm whether this is occurring. Our team will perform a comprehensive social audit of these sites to identify any additional violations of our Code of Conduct. Any serious findings will lead to immediate action and further discussions.

This year, we rolled out training for our buying teams to remind them of the core questions they need to pose to suppliers in terms of capability and capacity.

We have outlined our approach to supplier selection in more detail in our [Modern Slavery Statement 2023](#) (p21) and continue to implement this approach.

Transparency and traceability of supply chain

We're focused on improving transparency and traceability across our end-to-end product supply chain. This will enable us to further understand what potential risks are present throughout the supply chain, allowing us to prioritise our approach to risk. The size and complexity of our product supply chain makes traceability a challenge but it's something we continue to focus on. We have a dedicated Traceability team within the Sourcing team, to help us further embed this with our business and supply chain. This team is located across our Head Office and our key sourcing markets.

Tier one (finished goods)

Primark's Global Sourcing Map covers tier one factories that make our products, and the number and gender of workers at each site. The map is available [here](#).

Upstream (suppliers of fabrics and yarns)

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 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 increased the number of raw materials mapped to the four main materials Primark uses, cotton, polyester, nylon and manmade cellulosic fibres such as viscose.

We continue to train suppliers regularly on our traceability expectations to uphold these standards.

Upstream (suppliers of raw materials)

As of July 2023, 57% 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 as 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 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 spinner. To give us greater assurance, we partnered with Oritain, a specialist verification firm which uses forensic science techniques to confirm the cotton's source.

Transparency and traceability of our supply chain continued



The Primark Cotton Project

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

We have since expanded our Primark Cotton Project to other countries and work with an additional local partner Myrada in India, the Rural Education and Economic Development Society (REEDS) in Pakistan and Thengamara Mohila Sabuj Sangha (TMSS) in Bangladesh.

As of July 2024, 309,394 farmers received training within the Primark Cotton Project.

About the programme

Cotton farmers are trained to use water more efficiently and reduce dependence on chemical fertilisers and pesticides, in addition to learning new skills relating to seed selection, land preparation, sowing, crop management and harvesting. The training is aligned to CottonConnect's [REEL Regenerative Code of Conduct](#). Some of the farmers have shared with us how they have re-invested their improved income from the cotton into their farms and homes, and in the education of their children.¹

Approximately 90% of the farmers in our Primark Cotton Project are smallholders and 84% of the farmers in the programme are women. Building resilience among farming communities is at the centre of the Primark Cotton Project.

Identifying and addressing risks within the cotton supply chain

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

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

Transparency and traceability of our supply chain continued

Human Rights Due Diligence in the Primark Cotton Project

We are enhancing our approach to human rights due diligence (HRDD) and strengthening progress against the social elements of the REEL Code of Conduct at farmer level, in collaboration with Impactt, CottonConnect and SEWA.

Whilst the Primark Cotton Project does have an existing approach to HRDD based on the REEL Code requirements, we are proactively working with our partners to evolve and strengthen the approach at smallholder farmer level, so the Primark Cotton Project is better aligned with international best practice in this area and appropriate to the local context. To achieve this, we are working with international consultancy Impactt who have over 25 years' experience delivering diagnostic and improvement work to uncover root causes of issues affecting supply chains.

Our work with Impactt has focused on building a human rights due diligence framework for the Primark Cotton Project that is based on the [OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector](#). The first part of this has been working with CottonConnect at a strategic level to build a gap analysis and understand the roles and responsibilities of the different actors in the cotton supply chain. Impactt has also developed a monitoring framework which is based on our Supplier Code of Conduct. This includes building out a methodology for field level assessments, how our partners define severity of risks, and potential response pathways. In 2023 we piloted this framework in Türkiye on large scale farms, where the main risks identified were related to wages and occupational health and safety. We are now piloting the framework for smallholder farmers in India.



309,394
farmers trained or
receiving training
currently



84%
are women

Working with partners and stakeholders

Working with partners and stakeholders to increase leverage and improve standards

We often work with trusted partners to help us deliver greater impact within our business, supply chain or local communities.

This can range from scoping risks within our risk identification process, understanding the nature and root causes of risks, working with partners to prevent and mitigate those risks through programmes and initiatives on the ground in our sourcing countries, to supporting workers getting access to effective grievance mechanisms.

These include partners from a range of organisations – membership groups, charity organisations, local and international NGOs, governments and unilateral and multi-stakeholder initiatives.

A full list of our partners can be found in Annex II – Our Partnerships, p22.

Additional information is included in the [2024 Primark Sustainability and Ethics Progress Report](#).

My Life, India

My Life Programme

The “My Life” programme, initiated by Primark in India in 2017, is designed to empower vulnerable migrant workers, particularly women, in the garment supply chain. The primary objective of the programme is to equip workers with essential life skills across three key areas: communication skills, knowledge of worker rights, and workplace health practices. By addressing these critical areas, the programme aims to build resilience among workers, enabling them to navigate complex factory environments and mitigate the risks they face.

Migrant workers in India often encounter significant vulnerabilities, including poor education, limited understanding of their rights, and language barriers. Many workers lack access to essential information, such as employment documents and workplace benefits, which makes them vulnerable to potential abuse and exploitation, which is a key indicator of potential forced labour as outlined by the ILO.

The My Life programme is delivered by Primark’s Ethical Trade Team in India. The programme was initially developed in partnership local NGOs Maitrayana and the Naz Foundation, and global NGO Women Win. This partnership helped strengthen the initiative’s ability to reach and effectively support the most vulnerable workers in the supply chain, particularly in the early years.



Working with partners and stakeholders continued



An independent assessment conducted by 60 Decibels, from a survey of 545 workers has highlighted the positive impacts of the My Life programme, particularly for the most vulnerable workers. Key findings include:

- Almost all trained workers reported that this was the first interactive training they have ever received. This finding shows 97% of surveyed workers prior to My Life had never received a training like this before and therefore arrive with very limited basic skills and knowledge to apply in the factory workplace. This is a consistent finding across men, women, migrant workers, and local hires. Significant improvements across all key areas of communication skills, understanding rights and responsibilities, and health in the workplace. 98% of surveyed workers self-reported 'significant' or 'some' improvements across key areas, which helps us understand that these workers have felt impacted by the training.
- More migrant workers report significant improvements compared to local hires. For example, 70% of migrant workers reported their communication skills had 'very much improved' following the training compared to 50% of non-migrant workers. This is one of the most significant findings because it demonstrates that the most vulnerable are most positively impacted.

“

This was my first time working outside my home. I did not know much about the working procedure or even Tamil or Hindi. Over the training period, I talked with people and understood the work and lifestyle here. The programme is very good for new colleagues, and I surely will recommend it to them.

Female migrant worker, 19

“

This training consists of everything which is related to a migrant worker from taking care of hygiene, to safety at the workplace to understanding documents to communicate with our supervisor and colleagues. We never had access to these basic things which are very important for our life.

Male migrant worker, 40

Fair and safe working conditions

Within this section, we have reported on our due diligence on selected issues relating to fair and safe working conditions – such as living wages, purchasing practices, and freedom of association. These can contribute to, or are related to, ILO indicators of forced labour.



Living wages

We've committed to pursuing a living wage for workers in the supply chain under our Primark Cares strategy, supported by financial literacy training and access to social protection by 2030. More information on our work on financial resilience and social protection as can be found in our [Primark Sustainability and Ethics Progress Report](#).

Freedom of association and worker representation

We acknowledge and support the right to freedom of association. This enables workers to be aware of, and to exercise their fundamental rights at work. We also support the role of legitimate trade unions in achieving mature industrial relations and addressing labour disputes and grievances.

- Our [Supplier Code of Conduct](#) sets out the standards we expect of our suppliers in relation to freedom of association and collective bargaining agreements.
- We monitor and track alignment with the Supplier Code of Conduct, looking at whether the site has a trade union or worker representation and how many workers are covered through collective agreements by a trade union or other means. We require factories to supply documentary evidence, a list of committee members and minutes of meetings, election procedures, and registers of any grievance or suggestion boxes during the audits that we conduct as part of our factory-level due diligence.
- We participate in programmes such as Better Work which strengthen and build the capacity of workers and management to understand and participate in mature industrial relations and social dialogue. More information on these programmes and the partners we work can be found in the Annexes (p22, p27).

- We engage and work directly with trade unions and other relevant stakeholders to resolve specific issues and grievances. Where necessary, we have sought the involvement of national Arbitration Councils, the ILO, and multi-stakeholder initiatives including the ETI in order to resolve these issues.
- We are 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. Updates on ACT's activities in the countries can be found on the [ACT website](#).

Access to grievance mechanisms and remedy

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

When grievances are raised, we take immediate steps to investigate thoroughly while protecting the confidentiality of those raising the complaint, victims and anyone else who might be affected. We do not tolerate any retaliation against those who have raised the grievances and any affected stakeholders.

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

We track, monitor and report on the key performance indicators related to grievances. See Annex III, Key performance indicators (p25).

Access to grievance mechanisms

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 principles¹ 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 markets 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.

Suppliers' own operational-level grievance mechanisms for their employees

Our [Supplier Code of Conduct](#) requires all suppliers to establish their own effective and accessible grievance mechanisms for their own employees and management. We check whether our factories are compliant with this requirement and require suppliers to provide us with anonymised information on grievances that are registered with their grievance mechanisms.

The relevant clause in our Supplier Code of Conduct states:

Grievance Procedure

1. There should be a procedure that allows workers to raise and address workplace grievances, without fear of reprisal.
2. The procedure must be clearly communicated to workers at the time of their recruitment and be easily accessible to all workers and their representatives.
3. The grievance procedure must involve an appropriate level of management.
4. The management must address workers' concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned.
5. The grievance procedure must not be used to undermine the role of trade unions and collective bargaining processes and must not impede access to other existing judicial, arbitration or administrative procedures.

1. More information on the criteria set out by the UNGP can be found [here](#)

Access to grievance mechanisms and remedy continued

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

We work with civil society and other organisations to develop bespoke grievance mechanisms that are available to a number of workers in our supply chain. As of July 2024, we have supported the roll-out of five independent initiatives supporting the development of effective grievance mechanisms across 212 participating factories.

Care is taken to ensure these mechanisms do not undermine supplier's own operational level grievance mechanisms for their employees or those set up by worker committees or trade unions. We review these mechanisms regularly to ensure they are effective for the stakeholders they are intended to support.

- **Amader Kotha, Bangladesh:** The Amader Kotha hotline is an independent, industry-wide grievance mechanism implemented by project partners Clear Voice, a project of the Cahn Group, civil society organisation Phulki, and LRQA. This year, we supported the introduction of Amader Kotha's new eLearning platform for factory managers, to help embed the hotline across their workforce.
- **Hamary Awaz, Pakistan:** The Hamary Awaz Helpline is implemented by project partners Clear Voice, a project of the Cahn Group, civil society organisation Baidarie, and LRQA. Training and other support is provided by NGO Phulki.
- **Ungal Karal, India:** Ungal Karal in India is an external and independent grievance mechanism operated by a third-party to provide workers with a trusted, accessible means to raise concerns. Through the pilot helpline, workers report on substantive issues in their factories, including health and safety concerns, wage compensation, leave, termination and other general inquiries. Over the next year, we will use learnings from the pilot to continue to develop the project.
- **Worker Support Centre, Türkiye:** We continued our pilot of the Worker Support Centre, a grievance mechanism operating in four languages, run by Turkish NGO, Refugee Support Center (MUDEM). This is our final year of the partnership.

The project was originally designed to focus on refugee workers in the garment industry but has now been expanded more broadly for factories operating in the garment sector. Over the next year, we will transition factories within our Türkiye supply chain to our 'Tell Us' grievance mechanism.

- **Handshake Workers' Hotline, China:** This is a new grievance mechanism set up in partnership with local partner INNO. This independent grievance mechanism helps workers to access support and information and register their grievances confidentially. We have piloted this mechanism over the last year within our China supply chain.

Industry sectoral mechanisms: Primark is also a member of multi-stakeholder initiatives ACT and the RMG Sustainability Council which provide access to sectoral grievance mechanisms.

Providing remedy

Under the OECD Due Diligence Guidance, companies are expected to provide for, or cooperate in, the remediation of harms where they have caused or contributed to that impact. We seek to ensure that any provision of remedy is satisfactory to those affected and seek to involve them in the design of the remedy. We regularly share information on our experiences and

the challenges of effective remedy within our sector, through reports to stakeholders and through industry forums such as the ETI, BetterWork and the OECD.

Tracking and monitoring

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

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

All our programmes and projects are reviewed through a Monitoring, Evaluation and Learning (MEL) framework. We also work with social impact measurement experts 60 Decibels to strengthen our measurement approach and to understand the effectiveness of our programmes in line with international best practice.



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Annexes

Annex I – Modern slavery risks in the global garment and footwear sector

Global risks within the garment sector

Our due diligence process has identified potential and actual risks of modern slavery within our industry. Many of these risks are systemic and endemic to a particular region, country or worker population and are also present in other sectors and industries. We have outlined steps we are taking as part of our due diligence process to prevent and mitigate these risks.¹

Agency labour in supply chains

Workers hired through agency and labour providers can be particularly at risk of modern slavery.

Our actions taken to address these risks:

- Programme of enhanced due diligence of agency and labour providers including in production, logistics providers, warehouses and recyclers, security providers, cleaning services, across both goods for resale and goods not for resale.
- Adapted audit programme to identify risks based on the current context in each country.
- Corrective action programmes at individual site level.

Cotton

In many cotton-producing countries, temporary and migrant workers employed by cotton farmers can be at high risk of indentured and bonded labour and child labour. Risks of forced labour also exist within the cotton value chain at ginning and spinning mill level. We have prioritised the traceability of cotton within our Primark Cotton Project. Further details can be found on p11.

Cotton from Uzbekistan and Turkmenistan

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

Our actions taken to address these risks include:

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

Migration from Ukraine

Workers fleeing conflict from Ukraine, could potentially be at risk of exploitation in destination countries. We continue to monitor migrant worker populations and after an initial influx, we have seen the number of Ukrainian migrants level out across UK sites, and continue to see rising numbers in Eastern Europe.

Spinning mills and factories in South India

Migrant workers, including young women, can be at risk of forced labour in spinning mills and factories in South India. There are some inherent socio-economic drivers that create these vulnerabilities, including limited knowledge of rights and education, economic choices and issues of communication due to language barriers. Those from lower castes or marginal ethnic groups are particularly at risk.

Our actions taken to address these include:

- Implementation of the My Journey Programme in mills to address recruitment and hiring practices; See p9 for further detail of the programme.
- Support for various factory-level programmes and multi-stakeholder sectoral initiatives with brands, local and national civil society groups, suppliers, factories and other associated experts and partners.

Forced labour in China

Adhering to the terms of our [Supplier Code of Conduct](#) is a mandatory condition of working with Primark. In 2019, we found we could no longer conduct effective human rights due diligence in the Xinjiang Uyghur Autonomous Region of China (XUAR), a critical tenet of our Code of Conduct. Subsequently, in September 2020, we prohibited all suppliers who make products for Primark from using or sourcing products, materials, components, or labour originating in any way from the region.

1. This is not intended to be a complete map of all inherent risks that Primark has identified across its global value chain but indicates some of the major forced labour risks present across the sector.

Annex I – Modern slavery risks in the global garment and footwear sector continued

We remain committed to this position and its enforcement. This includes obtaining our suppliers' written acknowledgement of compliance with our supplier mandate, specifically naming several organisations from which they cannot source. This list is reviewed and recirculated to suppliers regularly.

Our actions include:

- For the past six years, we've published our [Global Sourcing Map](#), which covers tier 1 factories that make our products, in addition to showing the number and gender of workers at each site shown.
- Over the last two years, we've been building a partnership with a platform for supply chain traceability, [TrusTrace](#). Its traceability software and online platform allows us to gather data from the supply chain of a product from raw materials through to finished product. We started with the supply chains of products containing cotton, as it is our most used fibre, with a pilot involving suppliers that account for around one third of our cotton used. We have since expanded the programme to include more suppliers, fibres and products.
- Since last year, any new factories onboarded in China are required to provide a supply chain map as a matter of course, and we carry out our own analysis to check for risk of exposure to the XUAR.
- We have recruited a dedicated Traceability team within our Sourcing team to lead this programme. This team is based centrally in our Head Office and across our sourcing markets.
- As of July 2023, 57% of the cotton clothing units sold contained cotton that was organic, recycled or sourced from the Primark Cotton Project our unique training programme for cotton farmers in our supply chain. 44% of the cotton we use comes from the Primark Cotton Project. This programme sources cotton from smallholders and small-scale farmers in India, Pakistan and Bangladesh. Forensic specialists Oritain provide us with additional verification of the origin of this cotton which further reduces our exposure to the XUAR.

- We continue to train suppliers on a regular basis around our traceability expectations. Last year, we ran training for all tier 1 suppliers on how enhanced legislation and supply chain due diligence expectations are driving traceability requirements, and the challenges we'll need to work through together to ensure compliance. This year, we also ran face-to-face training with forty-eight suppliers in China highlighting the importance of traceability, why it matters and what is required from a Primark supplier perspective.
- Primark has a large Ethical Trade team in China who have received specific training on how to monitor for the presence of XUAR labour. We've doubled the number of inspections this team conducts in Primark-approved factories throughout China as an additional due diligence mechanism in response to these risks.

Migration into Türkiye

Undocumented foreign workers in Türkiye, including refugees from Syria, Afghanistan and other Middle Eastern countries, are at high risk of forced labour and poor working conditions. Our actions taken to address these risks include:

- A partnership programme with expert NGOs since 2016 to provide support and remedy for any undocumented refugees and foreign workers.
- Monitoring these risks through audits and factory checks at factory and subcontractor level.
- Corrective action programmes at individual factory level where issues are identified.

Myanmar

In September 2022, following the publication of the [Ethical Trading Initiative \(ETI\) assessment on responsible business conduct within Myanmar](#) we took the difficult decision to exit the country and created a framework to guide our responsible exit. The ETI's independent findings confirmed we could no longer conduct the necessary due diligence we insist upon to protect the safety and rights of the people who make our products.

We worked closely with global trade union IndustriALL and other major brands with reference to the OECD guidance to working in conflict affected areas for our responsible exit from Myanmar. Our final orders were shipped in October 2023. The 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.

Our actions included:

- Working closely with global trade union IndustriALL and other major brands to create a framework for responsible business disengagement from Myanmar with input from the OECD's Centre for Responsible Business Conduct (OECD). This new framework aligned with our long-standing global approach to responsible factory exit under the terms of our membership of ACT, and took into account the very specific context of Myanmar post the coup in 2021 and the guidelines of the OECD. The framework guided our responsible exit from Myanmar which was conducted with frequent consultation with IndustriALL and other relevant stakeholders. These included the ETI, the Myanmar Centre for Responsible Business, Eurocham Myanmar, Smart Myanmar, the ILO and local and international worker organisations.
- We worked closely with factories, suppliers, trade unions, basic labour organisations and project partners to seek remedy for issues that arise and, where possible, build capacity for the factories' management and mitigate the impact to the workers in our suppliers' factories.
- Final orders from Myanmar were shipped at the end of October 2023 with the Primark team ceasing operation in the region at the end of March 2024.

Annex II – Our partnerships

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



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



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



Annex II – Our partnerships continued

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



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



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



Annex III – Key performance indicators

Through our due diligence programme, we monitor the steps we take to address the risk of forced labour indicators by tracking the following indicators.

Audit indicators¹



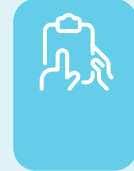
98%²
of tier one suppliers' factories were audited



90%
of audits were unannounced (apart from initial approval audits)



2,536
audits were conducted³



Of all non-compliances,
0.44%
were identified that fell under the 'Employment is Freely Chosen' condition of our Supplier Code of Conduct



Of all non-compliances,
0.25%
fell under the 'Employment is Freely Chosen' condition of our Supplier Code of Conduct and were resolved



59
incidents of unauthorised sub-contracting were identified

Number of programmes and projects in our supply chain⁴

Number of initiatives supporting access to social protection and financial education and services.

We implemented five initiatives supporting access to social protection and financial education and services in 28 factories across four countries.

- Haqdarshak
- Bright Futures
- Responsible Wage Digitisation
- Securing Futures
- My Life

Number of initiatives supporting skills development.

We implemented two initiatives supporting skills development in our finished goods supply chain across 35 factories.

- Sudokkho
- My Life

Number of factories participating in the Sudokkho initiative.

Our skills development programme, Sudokkho now covers 28 factories in Bangladesh.

Number of initiatives supporting efforts to address GBVH

We implemented three initiatives supporting efforts to address GBVH in 28 factories across three countries.

- Maitri
- Drama for Change
- Respectful Workplaces

Number of initiatives supporting the development of effective grievance mechanisms

We supported the roll-out of five initiatives focusing the development of effective grievance mechanisms across 212 participating factories.

- Worker Support Centre
- Hamary Awaz
- Amader Kotha Hotline
- Handshake Worker's Hotline
- Ungla Kural

Number of initiatives supporting the development of worker representation through democratically elected bodies.

We supported the initiative Industrial Relations in Bangladesh, which encourages worker representation through democratically elected bodies, across 26 participating factories.

Number of initiatives supporting improvements to workers' physical and mental health and wellbeing.

We implemented five initiatives supporting improvements to workers physical and mental health and wellbeing across 127 participating factories.

- EHS Now!
- Employment Injury Scheme
- My Space
- Moner Kotha
- Safety on site (SoS) – AKUT

1. For the calendar year 2023 (01 January to 31 December 2023)


2. 2% of factories were not audited during this period due to planned deactivation


3. Data assured by EY. <https://primark.a.bigcontent.io/v1/static/Primark-Social-Audit-Performance-2023>


4. For reporting period 1st August 2023 – 31st July 2024


Annex III – Key performance indicators continued


Supporting workers to access external independent grievance mechanisms¹


Country	 Bangladesh
Mechanism	Occupational Safety and Health (OHS) Complaints Mechanisms
Provider	Bangladesh RMG Sustainability Council
Coverage across Primark's supply chain	204 factories
Number of issues reported	88 issues were reported ²

Country	 Bangladesh
Mechanism	Amader Kotha Helpline
Provider	Cahn Group, Phuki, LRQA
Coverage across Primark's supply chain	203 factories
Number of issues reported	1,788 issues were reported. 1765 were resolved. 23 were outstanding.

Country	 Pakistan
Mechanism	Hamary Awaz
Provider	Cahn Group, Baidairi, LRQA, Phulki
Coverage across Primark's supply chain	10 factories
Number of issues reported	147 issues were reported. 123 were resolved, 24 were outstanding.

Country	 Bangladesh
Mechanism	ACT Interim Dispute Resolution Mechanism (DRM)
Provider	ACT, Bangladesh Apparels Workers Federation (BAWF), National Garment Workers Federation (NGWF), Akota Garments Workers Federation (AGWF)
Coverage across Primark's supply chain	204 factories
Number of issues reported	3 issues were received. 2 were resolved, 1 was outstanding.

Country	 Türkiye
Mechanism	Worker Support Centre
Provider	MUDEM
Coverage across Primark's supply chain	52 factories
Number of issues reported	30 issues were reported. 29 were resolved, 1 was outstanding.

Country	 India
Mechanism	Ungla Kural
Provider	LRQA and NGOs
Coverage across Primark's supply chain	8 factories
Number of issues reported	28 issues were reported. 28 were resolved.

Country	 China
Mechanism	Handshake Workers' Hotline
Provider	INNO
Coverage across Primark's supply chain	100 factories
Number of issues reported	21 issues were reported ³

1. Information on grievances is provided by third party providers and is not assured by Primark. Data on issues received relates to the reporting period 1 August 2023 – 31 July 2024.

All issues relate to those raised by workers in Primark's supply chain.

2. Data on cases resolved and pending was not provided by the third party.

3. Data on cases resolved and pending was not provided by the third party.

Annex III - Key performance indicators continued

Data on grievances received through Primark grievance mechanism channels¹

Data on grievances August 2023 – July 2024

Grievances related to clauses of our Code of Conduct

Open/Pending	Resolved	Total
3	27	30

Grievances specifically related to issues of forced labour²

Open/Pending	Resolved	Total
0	2	2

Tell Us Grievance mechanism

Total
18

1. Figures are based on grievances raised through Primark channels including those raised to Tell Us, auditors or through the customer service section of our website. All calculations are based on unique cases only, regardless of trigger. All have been identified as grievances. Figures do not include data from external independent grievance mechanisms which reported elsewhere in this report.

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

Annex IV – Worker-focused programmes and projects

Amader Kotha, Bangladesh (2020 – present)

Amader Kotha is a grievance mechanism in Bangladesh. See p17 for further detail on our approach to grievance mechanisms.

Partners: The Cahn Group, Phulki, LRQA

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

Primark is a partner member of the Better Work programme which operates in key sourcing countries. Better Work conducts monitoring of sites and provides capacity building for management.

Partners: ILO Better Work, IFC

iBridging Solution, Bangladesh (2022 – present)

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

Partner: ILO

Bright Futures, Vietnam (2022 – present)

Bright Futures aims to improve workers' financial health. The peer led model is under development and includes Bright Futures (self-learning) financial literacy booklets, peer leader training and mentoring support to peer leaders.

Partners: Standard Chartered Foundation and IDEO.

Digital Wage, Cambodia (2024 – present)

Digital Wage supports factories in making the transition from salary payments in cash to wage digitization through a Train the Trainer model.

Partners: GOPA, RISE, CGTI, GIZ.

Drama for Change, Vietnam (2022 – present)

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

Partner: Atelier Theatre et Arts (ATH)

EHS Now!, China (2020 – present)

EHS Now! Supports suppliers and factories to enhance their capability in managing EHS (environmental health and safety) issues in a more proactive manner. As part of the project, managers are trained in EHS topics such as chemical safety and personal protective equipment using a Train the Trainer methodology.

Partner: Meaning Advisors

Hamary Awaz, Pakistan (June 2023 – present)

Hamary Awaz is a grievance mechanism in Pakistan. See p17 for further detail on our approach to grievance mechanisms.

Partners: The Cahn Group, Baidari, LRQA, Phulki

Handshake Worker's Hotline, China (November 2023 – present)

Handshake is a grievance mechanism in China. See p17 for further detail on our approach to grievance mechanisms.

Partner: INNO

Haqdarshak, India (2023 – present)

Haqdarshak supports workers to access to welfare schemes. Haqdarshak is a community-based model now being piloted in sample of Primark's supplier factories in India.

Partner: Haqdarshak

Health Mela, Bangladesh (March 2024)

The Health Mela was a fair aimed at supporting the health and wellbeing of workers. The fair hosted 19 organisations from Bangladesh who provide health-related services and support workers and was attended by representatives from Primark's suppliers and factories.

Partner: Project led by Primark

Industrial Relations Training, Bangladesh (Jan 2023 – present)

Developed in partnership with Just Solutions, the training programme aims to build the capacity of factories in the area of industrial relations.

Partner: Project led by Primark

Annex IV – Worker-focused programmes and projects continued

Janbo Mora Janabo (July 2016 – ongoing)

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

Partner: Project led by Primark

Maitri, India (Sept 2022 – present)

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

Partner: St John's Medical College

Male Management Attitudes Research, India (2024 – present)

Research project focused on the male factory management attitudes to gender equity. The subsequent conversation guide developed as part of this work will support our understanding of management attitudes in the future.

Partner: ICRW

Moner Kotha, Bangladesh (2022 – present)

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.

Partners: British Asian Trust, Sajida Foundation

My Journey, India (2019 – present)

My Journey trains all staff and workers in a factory who are involved in recruitment and hiring of workers to help them understand the potential risks of forced labour involved in these processes, and how they can help to address them. See p9 for further detail on this programme.

Partners: Project led by Primark

My Life, India (2017 – present)

My Life in South India supports factories to train workers in basic life skills, including health and safety in the workplace, rights and responsibilities, communication, and teamwork. See p13 for further detail on this programme.

Partners: Women Win, Maitrayana Charity Foundation

My Space, India (2018 – present)

My Space aims to support the mental health of workers in selected factories in South India by establishing basic counselling services in factories, training selected factory staff as peer counsellors and engaging with workers and managers to reduce the stigma around mental health.

Partner: St John's Medical College

Pashe Achi, Bangladesh (March 2015 – present)

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

Partner: University of Dhaka

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

A pilot programme to improve the financial health of young garment workers in Vietnam.

Partners: Standard Chartered Bank, IDEO

Social insurance Project China (2018 – present)

Founded in partnership with Carnstone, the project aims to raise workers' awareness and understanding of China's complex social insurance system among workers and factory management, and support access to social insurance.

Partner: Project led by Primark

Refugee Recruitment Support, Türkiye (2022 – Sept 2024)

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

Partner: United Work

Respectful Workplace Programme, Vietnam (2022 – present)

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

Partner: IFC

Securing Futures, India (2022 – present)

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

Partner: Project led by Primark

SMART, Myanmar (2021 – Sept 2023)

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

Partner: SMART Myanmar

SoS, Türkiye (2023 – April 2024)

The S.O.S. (Safety on Site) project aims to improve disaster preparedness in Turkish factories, with a focus on earthquake response. The project trains workers and management in emergency protocols, enhancing factory emergency plans, and fostering a safer, more resilient work environment.

Partner: AKUT

[Annex IV - Worker-focused programmes and projects continued](#)

Sudokkho, Bangladesh (2016 – present)

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

Partner: Rajesh Bheda Consultant (RBC)

Ungal Karal, India (June 2023 – April 2024)

Ungal Karal is a grievance mechanism in India. See p17 for further detail on our approach to grievance mechanisms.

Partner: Elevate

Vision Spring, Bangladesh, Vietnam, India (June 2024 – present)

The pilot project aims to help workers have the benefit of clear vision, and includes eye testing for workers, providing eyeglasses where needed, and training to support and encourage workers to wear their new glasses.

Partner: Vision Spring

Worker Support Centre, Türkiye (July 2020 – present)

The Worker Support Centre is a grievance mechanism in Türkiye. See p17 for further detail on our approach to grievance mechanisms.

Partner: MUDEM, United Work

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<https://corporate.primark.com/en-gb/modern-slavery-statement>