

PRIMARK®

**Primark Ltd.
Modern
Slavery
Statement
2022**

Introduction	3
Policies	8
Spotlight on gender	11
Due diligence to identify risks	13
Traceability and transparency of supply chain	17
Supplier selection	19
Due diligence to prevent and mitigate risks	21
Working with partners and stakeholders to increase leverage and improve standards	25
Decent work	27
Access to grievance mechanisms and remedy	29
Tracking and monitoring	33
Annex I – Global risks	35
Annex II – Our partnerships	38
Annex III – Key performance indicators	41
Annex IV – Worker-focused programmes and projects	43

Our commitment

We're pleased to share our Modern Slavery statement, which covers our activities for the financial year ending 17 September 2022, in respect of the requirements under the UK Modern Slavery Act 2015.

Modern slavery is one of the most prominent risks within global supply chains. According to new figures released by the United Nations (UN) in September 2022, there are an estimated 27.6 million people in forced labour, a significant increase compared to the last figures from 2016. COVID-19, armed conflicts and climate change have exposed vulnerabilities in global supply chains and these challenges have led to unprecedented disruption to employment and education, a rise in poverty, forced and unsafe migration, and an upsurge in gender-based violence.

Primark's commitment to our customers and stakeholders on this is very clear: we ban all forms of modern slavery, including child labour, forced labour and human trafficking. We take our responsibility to respect human rights extremely seriously and we're committed to preventing and addressing any modern slavery risks we identify in our operations and, where we can, in our supply chain. We do this in line with our [Supply Chain Human Rights Policy](#) and [Code of Conduct](#) which are aligned to the [United Nations Guiding Principles](#) and [OECD Due Diligence Guidance](#).

In this statement we show how our commitment is put into practice through our wider risk and due diligence processes. The statement details areas of risk identified and the steps we're taking to address these directly ourselves or with our partners and with stakeholders across the industry.

All our Modern Slavery Act statements can be found on our [Primark Cares website](#), and we welcome feedback on our efforts from our stakeholders, our customers, and other interested parties.

This statement was endorsed by the Primark CEO and Leadership Team in March 2023.



Paul Marchant
CEO, Primark
March 2023



“

We take our responsibility to respect human rights extremely seriously and we're committed to preventing and addressing any modern slavery risks we identify in our operations and, where we can, in our supply chain.

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About Primark

Primark is an international retail company employing more than 72,000 colleagues¹ across 15 countries in Europe and the US, headquartered in Dublin, Republic of Ireland. Founded in Ireland in 1969 under the Penneys brand, Primark aims to provide affordable clothing for everyone, from great quality everyday essentials to stand-out style across womenswear, menswear and kidswear, as well as beauty, homeware and accessories. While we don't own the factories that produce our goods, we know we have a responsibility to ensure the people who make our products can access decent work, with safe workspaces which are 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 covered by the [ABF Modern Slavery Statement](#).



461
suppliers²



628,358
workers in tier
one supply chain⁵



883³
factories⁴



326,498
women workers



26
sourcing countries



2,471
ethical trade
supply chain
audits conducted
in 2021⁶

¹ Data as per ABF's financial year end of 17 September 2022.

² Data correct as of October 2022.

³ Figures based on our Global Sourcing Map, updated in October 2022.

⁴ Tier one factories manufacturing finished goods in our supply chain.

⁵ Figures based on our Global Sourcing Map, updated in October 2022. Our Global Sourcing Map is updated annually.

⁶ Data runs until 31 December 2021. 2,471 audits were conducted in total. This number has been publicly assured by KPMG and is covered under limited assurance by EY. We typically carry out an average of 3,000 factory ethical trade audits annually. During 2021/2022, the number was reduced due to restrictions from COVID-19 in our key sourcing markets. During the 2021 COVID-19 pandemic, all auditing continued but on a reduced capacity in line with safety requirements and travel restrictions. In the period under review, our ability to audit improved in all countries apart from China due to on-going restrictions. <https://primark.a.bigcontent.io/v1/static/KPMG-Assurance-Report-2021>

Governance and accountability

[Find out more](#)

We have established clear governance, responsibilities and accountabilities for the implementation of our policies and programmes within Primark:

- responsibility and accountability for risk management, including modern slavery due diligence, sits with the chief executives of each ABF business. The board of ABF provides continuous oversight and support;
- the Primark CEO and Leadership Team oversee the strategy around the due diligence of modern slavery risks that are specific to the Primark business and its supply chain, and it reports to the ABF board on elements and outcomes of this process;
- the ABF Group Corporate Responsibility Director has oversight of the development of Primark's policy relating to modern slavery due diligence. The Primark Ethical Trade and Environmental Sustainability Operations Director is responsible for operational implementation in the supply chain. Both report to the ABF Director of Legal Services and Company Secretary;

- potential and actual risks of modern slavery within the product supply chain are managed by the Primark Ethical Trade and Environmental Sustainability Operations Director and are reported to the ABF Director of Legal Services and Company Secretary, and the ABF Group Corporate Responsibility Director. The Director of Primark Cares is consulted on any areas of risk relevant to the delivery of the Primark Cares sustainability strategy. Severe risks are reported to the Primark Leadership Team and the Primark Business Risk Committee and escalated to the boards of Primark and ABF as necessary;
- Primark's Ethical Trade and Environmental Sustainability (ETES) team, consisting of over 130 team members working across 12 key sourcing markets, is responsible for managing Primark's due diligence within its product supply chain; and
- if a risk or issue is particularly serious or complex, a steering committee may be set up to manage and address the situation. This has been the approach, for example, in 2022 in relation to the risk of human rights violations in both Xinjiang and Myanmar. The relevant steering committee will include different specialisms from across the business as appropriate and will typically include members of the ETES team, Legal, Commercial, Sourcing, Supply Chain, Internal Audit and Corporate Affairs.

**130**

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

Communicating our progress

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

- We report on our progress annually through our Modern Slavery Act statements and publish these on our [website](#) which includes statements from 2016 onwards.
- We communicate on our programme and performance through the Primark Cares [website](#), the [Primark Sustainability and Ethics Progress Report](#) and the [ABF Responsibility Report](#).
- As members of the [Ethical Trading Initiative \(ETI\)](#) and the [German Partnership for Sustainable Textiles](#), we are assessed regularly on our due diligence. We also provide regular updates directly to our shareholders and stakeholders.

- NGO KnowTheChain benchmarks our performance on disclosure of our efforts to address the risk of modern slavery and we welcome their feedback which can be read [here](#).
- We welcome the launch of the UK Government Modern Slavery Registry to provide an accessible repository for company statements. ABF is considering how best to represent its businesses in the Registry, given the complexities of the ABF Group structure.



Primark Cares

[Find out more](#)

Primark's work focused on labour standards in its supply chain has been implemented through its Ethical Trade programme for over 15 years. Our Primark Cares strategy, launched in 2021, aims to build on these foundations and accelerate our commitments towards becoming a more sustainable business. Primark Cares is a multi-year strategy which will change how we do business and goes to the very heart of what we do. There are three pillars to the strategy – Product, Planet and People – each of which has a clear ambition and supporting targets. Our overall vision for Primark is to make more sustainable fashion affordable for all. Read more about Primark Cares in our annual report [here](#).

The People pillar is the most directly relevant to our work to address modern slavery. Our commitment under this pillar is to protect and improve the livelihoods of the people who make our clothes. Specifically, our commitments are to:

1

Create financial resilience – we will pursue a living wage for workers in the supply chain and support with 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 overall 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. See [here](#) for more information.

Full information on Primark Cares and the targets within each of the three pillars can be found in our [Primark Sustainability and Ethics Progress Report 2021/22](#).

COVID-19

[Find out more](#)

We continue to be mindful of the ongoing impact of the COVID-19 pandemic felt across our supply chain. Our Primark Cares people commitments seek to address some of the issues and vulnerabilities that were heightened by the pandemic: financial resilience, gender equality, health and wellbeing, which particularly affect women. We continue our efforts to support their wellbeing and access to decent work. To tackle the challenges that COVID-19 presented for workers, we had to re-evaluate existing programmes and establish new ones, depending on each country's situation. In India and Bangladesh, for example, our team worked to educate workers and management in our supply chain on COVID-19, including the effectiveness and safety of vaccines. These efforts were successful at scale. More information can be found [here](#).

Our policies and approach

We have policies and procedures in place for our suppliers and employees to ensure our standards are being met, and to help individuals raise issues and concerns.

Primark's policies are reviewed and updated as appropriate, to ensure they are fit for purpose and seek to align with international standards and best practice and address the most salient risks within the supply chain. The Primark CEO and Primark Leadership Team have accountability for the approval of policies. Our key policies are described below.

Our Supplier Code of Conduct

Our Supplier Code of Conduct 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 the 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).

The Supplier Code of Conduct forms part of Primark's Business Terms and Conditions, covering all suppliers. The Terms and Conditions state that the supplier is responsible for compliance with the Supplier Code of Conduct in its whole supply chain and that audit rights are granted with unfettered access. The Supplier Code of Conduct is updated regularly, following internal review, and with input from external stakeholders.

The most recent updates to the Supplier Code of Conduct were in 2019. These included strengthening sections on forced labour, living wages, freedom of association, child labour and health and safety, a new clause requiring suppliers to implement operational-level grievance procedures and updated links to our website to access our other resources and policies.

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

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

Our Supply Chain Human Rights Policy

Our Supply Chain Human Rights Policy was published in 2022. It was developed through stakeholder engagement, consultation and is sponsored and signed off by the Primark CEO.

The policy sets out:

- our commitments and contribution to the UN Sustainable Development Agenda, and in particular Sustainable Development Goal 8 on Decent Work: 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 throughout our supply chain; and
- how we enact the UN Guiding Principles for Business and Human Rights (UNGPs) and the OECD Due Diligence Guidance on Responsible Business Conduct and supply chain due diligence.

Anti-Bribery and Corruption Policy

As a subsidiary of ABF, Primark has adopted ABF's Anti-Bribery and Corruption Policy and is committed to maintaining the highest standards of ethics and compliance with all relevant laws wherever business is conducted. The policy is incorporated into our Supplier Code of Conduct and prohibits any bribes, including facilitation payments.

Primark head office employees are required to complete online training on anti-bribery and corruption when they join the company and at regular intervals thereafter. The ABF legal team delivers direct face-to-face 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. Prior to COVID-19, this training took place every 18 months. COVID-19 has meant that this training has been delayed due to restrictions, and we are working on how best to deliver this going forward.

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. In line with our Supplier Code of Conduct, Primark's suppliers are required to put in place anti-bribery and corruption procedures within their own businesses.

Primark Whistleblowing Policy

We encourage an open culture in all our dealings and support effective and honest communication. The Primark Whistleblowing Policy provides guidance for employees who feel they need to raise certain issues with Primark in confidence and is designed to protect the individual against any retaliation or detriment.

We have included further information on how we support workers and others to raise concerns, which can be found on [page 29](#).

Advocating for effective policy and legislation on modern slavery

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

In the year under review, there have been significant developments in legislation within the EU and the US on responsible business conduct due diligence and regulation focusing on forced labour. This includes the enforcement of the US Uyghur Forced Labour Prevention Act, the German Supply Chain Act, the introduction of the proposed EU regulation on a Forced Labour Import Ban, and EU directives on Corporate Sustainability Due Diligence and Corporate Sustainability Reporting.

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

- advocated for the introduction of mandatory human rights due diligence legislation in the UK as part of a collaborative effort with other companies and investors;⁷
- engaged with policymakers in the UK on addressing forced labour risks in global supply chains, including the UK Government's Environmental Audit Committee, the Department for Business, Energy and Industrial Strategy, and the Department of Foreign Affairs committee;
- engaged with policymakers through our membership of the Business Against Slavery Forum, a coalition of business and government that aims to accelerate progress to end modern slavery. As a group, areas of potential collaboration are discussed to address supply chain risks, raise awareness, support those who have been affected; and
- engaged in discussions on the EU directive on Corporate Sustainability Due Diligence through industry groups including the SAC Policy Hub.

Training and awareness for Primark employees

Training and awareness-raising programmes are important to help guide decision-making within our business. We deliver training directly to our employees in key roles through dedicated training seminars designed to promote awareness and mitigate and prevent risks. Highlights from the year under review include:

- developing a training module on the awareness of responsible purchasing practise commitments (see [page 27](#)) in collaboration with the Action Collaboration Transformation (ACT) Initiative using the Primark Digital Learning Platform. This was completed by 637 Primark colleagues in Buying, Merchandising, Design, Quality and Sourcing; and
- providing human rights due diligence training and awareness-raising session for 94 members of the ETES team, with more sessions to follow for other departments.⁸

⁷ https://media.business-humanrights.org/media/documents/UK_BUSINESS_STATEMENT_MHREDD_Sept22.pdf

⁸ Data correct as of October 2022.

Addressing issues of gender in our supply chain

Gender-based violence and harassment (GBVH) is one of the most severe risks facing women in global supply chains. Physical and sexual violence is one of the ILO indicators of forced labour. Issues can often be undetected or unreported and many workplaces do not have the skills and capacity to deal with cases when they do arise.

We understand that addressing and preventing risks to women requires a systems-led approach, and we continue to build and strengthen our approach to tackle this complex and serious issue.

- Our membership of the Business Fights Poverty (BFP) peer circle on tackling GBVH in global supply chains has provided us with access to learning and advice from international experts such as the International Finance Corporation (IFC) and companies from other sectors such as agriculture and mining;
- This year we have been working with BFP bilaterally on the development of a remediation toolkit for GBVH, aimed to help and guide our teams in-country. In June 2022, we ran a series of workshops for members of our global ETES team, including a session led by BFP on gender-based violence and harassment.
- We are a member of the Gender Equity Worker Engagement Group (GEWEG) run by the International Centre for Research on Women (ICRW). The GEWEG is a forum of international brands and advisors focused on developing gender tools and indicators that can be used to support the development of gender policies and practices and indicators within the workplace.

Within this report, we have highlighted some of the programmes we have developed in partnership with experts to tackle GBVH and promote gender equality.

Cambodia STOP

The Enhancing Women's Voice to STOP sexual harassment (STOP) project programme with CARE International was expanded into six factories in Cambodia between September 2021 and September 2022. Following a pilot in 2021, we hired a locally-based team member to support programme implementation and follow-up activities.

The project takes a holistic approach, combining factory interventions and community outreach. It employs a broad range of initiatives to tackle sexual harassment. Initiatives include practical support to improve factory policy, training management to strengthen their understanding and influence their attitude, providing practical guidance on how to establish and maintain effective grievance mechanisms for sexual harassment, and building workers' awareness, understanding and trust.

The programme has successfully led to the implementation of the CARE Sexual Harassment Prevention (SHP) policies in all six factories, as well as the establishment of Sexual Harassment Prevention Committees (SHPC) with representatives from human resources, trade unions, workers, nurses and line leaders. This means that factories now have systems in place to report cases of sexual harassment. The programme also connects factories to a Counselling Centre called Women's Empowerment (WE) House, where workers can access additional support for free.

Across the six factories training has been given to 1,087 workers, 830 of whom are women. Awareness-raising campaigns have been run with an additional 200 workers, of which 131 are women.

Despite challenges such as high turnover of workers on the committees and time constraints around peak production, the SHPC have taken ownership of training and support to workers. Our team on the ground continues to engage with these factories as they continue to embed and progress change.


6

factories


1,087

workers trained


830

are women

Vietnam Drama for Change

The Drama for Change programme in Vietnam seeks to raise awareness of GBVH by using drama and participatory techniques. The programme launched in 2022, in collaboration with Vietnamese theatre company Atelier Theatre et Art (ATH). ATH wrote and performed a play about a female worker's experience of sexual harassment in the workplace. The audience is made up of factory staff and workers who are then invited into the performance to take on the role of the workers in the play, where they discuss the issues and identify solutions as a group, in a safe environment. The performances create safe spaces for otherwise difficult or hidden conversations.

After successfully completing the pilot, we are now planning to roll out the Drama for Change programme to approximately 12,500 workers in 15 factories across Vietnam.

Vietnam Respectful Workplaces

Where Drama for Change seeks to raise awareness within workplaces, the International Finance Corporation (IFC) Respectful Workplaces programme provides the required technical support for suppliers to identify the risks of GBVH and other workplace violence and understand how to prevent and mitigate such risks. Launched in April 2022, Primark has partnered with the IFC to run a pilot with four suppliers across 15 factories.

The pilot stage seeks to understand what current due diligence on GVBH workplaces have, including policies, how risks are identified, and measures used to prevent and mitigate risks.

During this period, 5,000 employees were surveyed, and deep dive interviews and focus group discussions were held.

IFC is now analysing the inputs and will deliver its report by the end of 2022 with analysis and recommendations. This next stage of the programme will include the delivery of technical support for suppliers and factories on implementing the recommendations to address workplace GBVH.



Due diligence to identify risks

Within this statement, we have shared key actual and potential risks or hotspots we have identified within the garment and footwear industry at a regional, country or supply chain level. We take appropriate steps to prevent and mitigate the likelihood of such risks occurring. See [Annex I – Global risks](#).

We conduct due diligence to identify the potential and actual risks of modern slavery in our operations and supply chains. This process is continuous, dynamic, and is informed by and responsive to multiple, often interdependent stimuli and triggers. This includes, for example:

- information from stakeholders;
- our own internal research;
- findings from our country teams;
- analysis from our monitoring; and
- dialogue with workers and their representatives.

Using multiple different sources of information allows us to collate information and gain a more holistic understanding of risks.

We have prioritised identifying the risks in our tier one supply chain, where we have more visibility and knowledge of risks. We are now extending our due diligence into the lower tiers of our supply chain, including into raw materials where we have prioritised the cotton supply chain.

As part of our due diligence, we consider the root causes driving these risks, and whether risks are isolated and unique to a workplace or are widespread within a country or population. The presence of widespread risks can indicate a more systemic and endemic issue which requires a different approach than would be appropriate if we were to address a risk present in a particular workplace. The outcome of our risk mapping informs our due diligence programme, which enables us to prioritise our efforts and help prevent and mitigate risks in an appropriate manner.

Our due diligence risk identification process

We identify risks using a wide range of credible and robust sources both internal and external to the business.

Our global team

Primark's global ETES team is one of our most important resources in identifying risks. We have more than 130 team members working across 12 key sourcing countries. They play a significant role in monitoring conditions in our factories, engaging directly with workers in our supply chain and our external partners and experts on the ground to understand the risks and root causes. 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 additional layer of insight and visibility into working conditions and human rights risks within the supply chain.

We conduct audits, most of them unannounced, on all tier one factories at least once a year and are increasingly assessing tier two sites in our supply chain. In situations where we perceive there to be a high risk of forced labour, we increase the frequency of our audit programme and enhance it with specific training to identify relevant indicators. This provides us with information on risks at a site level. We are able to draw from intelligence and analysis of over 37,917 audit, investigation and spot check reports conducted on Primark's supplier factories since 2007, which allows us to conduct trend analysis.⁹

**37,917**

audits, investigations and spot checks carried out since 2007

Engagement and consultation with stakeholders

External stakeholders are a vital source of information and guidance to help us understand the risk of modern slavery in our supply chains, how to identify it, and which groups may be most vulnerable. Their insight and knowledge are invaluable. Stakeholders include civil society groups such as Anti-Slavery International, trade unions such as IndustriALL, governments, international agencies such as the ILO, intergovernmental agencies, multi-stakeholder initiatives (MSIs) such as the Ethical Trading Initiative (ETI), and legal experts.

Engagement and consultation with rights holders

As rights holders, workers globally across all sectors and industries can often be excluded from the due diligence process or face challenges in getting their voices and views heard. We have developed specific tools and methods to support rights holder consultation within our due diligence.

'Drawing the Line' is a participatory method and tool designed to obtain feedback directly from workers on how they feel about their work and life at the factory, to engage discussions with workers on any unmet needs in the workplace, and to educate workers on how they can approach securing those needs. It helps Primark to understand the violations and risks facing workers, alongside their broader unmet needs in the workplace. These findings help to inform programming and prevention and mitigation within the factories, based on the gaps and impacts. This ensures interventions are appropriate and tailored to the needs of workers.

The tool been used by our teams in Myanmar and India, both in partnership with and through support from local NGO experts.

Country-based due diligence risk research

Due diligence is conducted on new countries or regions and includes a deep-dive, desk-based assessment using external reports and sources of credible information, ahead of market entry and on an ongoing basis. The assessment includes political, economic, social and legal analysis, and risk-mapping including modern slavery risks. Assessments consider both the garment and footwear sector and additional relevant sectors and industries. This helps us to:

- build a comprehensive picture of the risks in the country, including those that fall into the classification of modern slavery using indicators of forced labour;
- understand the deeper root causes of these risks with a view to their prevention or mitigation ahead of entering a new country or region; and
- identify key stakeholders and initiatives working on these issues that we can engage with and learn from.



Worker rights consultation in India

In 2022, workers raised concerns about their living and working conditions at a factory in India. Primark's local team in India conducted an extensive worker engagement exercise with 210 workers, using several methods and techniques including Drawing the Line. The team had received specific training on how to use the tool and other participatory methods from local NGO Maitrayana.

The findings were revealing and concerning, with reports of bullying and harassment, lack of an effective grievance mechanism, misrepresentation of workplace facilities during the recruitment process, and workers not understanding and/or being informed of their rights. Primark shared the findings in a safe and confidential way with the factory management and received full cooperation. They agreed to develop and implement an extensive programme of work to address the issues raised, with regular guidance and monitoring by the Primark team. The joint Action Plan that resulted set the objective to improve the working conditions of vulnerable workers, specifically migrant workers, and women.

The Action Plan contained detailed and multiple activities over short, medium and long terms to address the findings. For example, to support the language barriers faced by migrant workers, the plan included: the appointment of migrant workers coordinators, translators and 'buddies' for migrant workers; awareness-raising training for supervisors and migrant workers on the role of the coordinators and translators; dual languages used for all major notices and information in the factory; and a monitoring system to check on the effectiveness of these measures. Similar actions were agreed across the other priority areas, including bullying and GBVH. Actions were also agreed to strengthen senior level management's support of the joint Action Plan.

To date, actions by the factory include the selection of 12 migrant workers to become 'buddies' and the launch of joint Hindi classes for workers and staff. The factory has commissioned training on appropriate workplace behaviours and invested in a more effective grievance mechanism. With regards to GBVH, the factory has worked with a local NGO to run awareness sessions and has empowered and strengthened the factory's Anti Sexual Harassment Committee.

These successful outcomes are the result of an engaged and responsible factory management team, together with a committed and knowledgeable local Primark team on the ground, and demonstrate how effective rights holder consultation can lead to the prevention and mitigation of risks.

 **210**

workers consulted

Strengthening our audit programme to address issues of gender discrimination

Risks related to gender discrimination take many forms and can be identified at multiple points throughout a woman's experience in the workplace – for example: recruitment and hiring, provision of compensation, provision of personal protective equipment (PPE), and workplace behaviours. In addition, the experience of women within the same workplace may differ depending on characteristics such as age, nationality and ethnicity.

In 2020, we committed to strengthen our audit programme to better identify and remediate issues related to gender discrimination.

A first step was to start training our team to raise their awareness of how gender-based risks present themselves in the workplace and how these risks could be identified within the audit process or through other engagement with workers. We partnered with the UK Foreign Commonwealth and Development Office (FCDO) on its Work and Opportunities for Women (WOW) programme to analyse our audit data, and WOW provided several recommendations on how our audit programme could be enhanced.

Tackling gender discrimination in our supply chain in Turkey

In two factories in Turkey, we identified discrimination taking place in factory job interviews. An interviewer had noted concerns about applicants' ability to perform the role in relation to female applicants who had children, the physical size of a female applicant, and male applicants who were eligible for military service. In another case, a factory had posted an advertisement asking for applicants who were aged 18–35 only.

In both cases, Primark was able to identify the discrimination through its audit process. To prevent and mitigate such risks recurring, Primark worked with the factories on implementing non-discriminatory recruitment policies and procedures, including anti-discrimination training for all employees involved in the recruitment process.

Heightened due diligence assessments for high-risk areas

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.

For example, the current situation in Myanmar is extremely concerning and very complex, with international stakeholders, including governments and trade unions, expressing differing views about the best course of action for the garment sector.

We leverage the strength of our Ethical Trade programme, long-standing relationships and local partnerships to monitor for compliance with our Supplier Code of Conduct, facilitated by our team in Yangon. In order to align with the UNGPs, due to the complexity of the situation since the military coup in February 2021 and the subsequent calls from global trade unions to disinvest from the country, we needed to conduct enhanced due diligence to inform our decision about our future sourcing strategy.

Working with a group of other international brands sourcing from Myanmar, who are also members of the Ethical Trading Initiative (ETI), we recognised that an extensive human rights impact assessment was called for.

A [report](#) was commissioned by the ETI and undertaken by independent experts, working with stakeholders locally and internationally, as well as engaging with workers in Myanmar.

The ETI report, which was published in September 2022, highlighted significant deterioration in the situation in Myanmar since the coup. It detailed challenges for businesses sourcing from Myanmar in relation to conducting the level of due diligence required to meet recognised standards. Consequently, we concluded we would work towards a responsible exit from Myanmar.

This was not a decision we took lightly and there is ongoing concern for those working in the factories in our supply chain. Therefore, this exit will be managed in close collaboration with our local and international partners and stakeholders, including the global trade unions and in line with the UNGPs. We will continue monitoring compliance with our Supplier Code of Conduct throughout the exit process and are considering ways to further support the workers in our Myanmar supply chain in this interim period. In order to do so, we have more than doubled the size of our team working in Myanmar.¹⁰

Transparency of supply chain

We are working to increasing the traceability of our supply chain. This will enable us to understand to a greater detail not only about where our products are made, but what risks are present throughout the supply chain, which in turn enables us to prioritise our most severe risks.

Tier one (finished goods)

We have full visibility of all the Primark tier one production sites that are approved to make our products. As part of our commitment to transparency, our [Global Sourcing Map](#) shows all tier one factories which manufacture for us, representing approximately 94% of Primark products for sale in our stores.¹¹ Production sites are included once they have worked with us for over one year. We include the factory name and address, the number of workers and the gender split. Information from the Global Sourcing Map is accessible as a PDF to download. The map is updated annually.

Upstream (suppliers of fabrics and yarns)

We know we need to do more and have begun working with a selection of suppliers to test a new traceability platform that will give us a greater visibility of our extended supply chain. We've already provided training on transparency and traceability to more than 450 garment suppliers and will continue to build awareness around this important topic. We also work with Oritain to support verification of the origin of cotton from our Primark Sustainable Cotton Programme (PSCP).

Upstream (suppliers of raw materials)

We work closely with our suppliers to ensure the PSCP cotton is segregated and traceable. We use CottonConnect's system, called TraceBale, to help us track and segregate the cotton from farmers in the PSCP to our supply chain (ginners and spinners). Given the complexity of the cotton supply chain, we wanted to go further and were one of the first high street retailers to partner with Oritain, a specialist scientific verification firm. While TraceBale gives us better visibility over the journey of the cotton from the PSCP to ginners and spinners in our supply chain, Oritain uses forensic science techniques to confirm the origin of the PSCP cotton. We combine the data from Oritain with the TraceBale database to help verify the traceability of the cotton from the PSCP.



¹¹ Figures based on our Global Sourcing Map, updated in October 2022.

The Primark Sustainable Cotton Programme

Nearly a decade ago in 2013, we launched the first pilot of the PSCP with 1,251 women farmers in Gujarat, India. Working in collaboration with agronomic experts [CottonConnect](#) and a local grassroots organisation the [Self-Employed Women's Association \(SEWA\)](#), our objective was to change the way we source our cotton, reduce our environmental impact as a business, and support the livelihoods of cotton farmers.

Since then, the programme has expanded to Pakistan and Bangladesh where we work with expert local partners, the Rural Education and Economic Development Society (REEDS) in Pakistan and Thengamara Mohila Sabuj Sangha (TMSS) in Bangladesh. Up to the end of August 2022, we have trained 252,800 farmers in more sustainable cotton production methods through our programme across India, Bangladesh and Pakistan.¹²

Cotton farmers are trained over three years to reduce their use of water and dependence on chemical fertilisers and pesticides, in addition to learning new skills such as: seed selection; land preparation and sowing; crop management and harvesting.¹³

The majority of farmers in PSCP are smallholders (around 90%), and 80% of them are women. Under the programme Sustainable Lives in Pakistan and Bangladesh, we also provide training on life skills such as financial literacy, decision-making and health, including family planning and menstrual hygiene. In addition, women are also educated about women's rights.¹⁴

Today we are on track to reach our commitment of increasing the total number of farmers in the PSCP to 275,000 by the end of 2023. We project this will increase the availability of cotton from our programme by around 60%.

As part of our due diligence, Primark and CottonConnect have taken the following steps.

In terms of human rights due diligence, CottonConnect conducts country-level and regional-level labour risk assessments against its code of conduct, the REEL Code. The REEL Code includes specific indicators on forced labour, including bonded and involuntary prison labour. Assessments are conducted by local implementing partners and CottonConnect's Monitoring and Evaluation team, and externally by FLOCERT. FLOCERT conducts verification assessments on a sample basis, of farmers in Year 2 of the programme. The assessment covers both verification at the implementation body level (local partner and CottonConnect) and verification of farmers and gins. The process involves site visits, staff interviews and a sample review of the validated data. Data collected is validated by an external auditor. CottonConnect contract Peterson and Control Union to annually validate their internally verified data on a sample basis. This involves farm visits, farmer interviews and cross-verification of the information recorded by farmers.

Primark is working with external experts Impactt to further develop the human rights due diligence framework used by CottonConnect within the PSCP. The intent is that in 2023 this enhanced framework will be piloted in one key cotton-producing region for the PSCP and then implemented by CottonConnect and its local implementing partners in the other regions and countries.



252,800
farmers trained



80%
are women



275,000
farmers in the PSCP by the end of 2023

¹² This includes farmers that are currently being trained and those that have completed training under the programme.

¹³ Based on CottonConnect's REEL Code: www.cottonconnect.org/sustainable-practices

¹⁴ This training is part of the Sustainable Lives Programme under the PSCP. It is currently run among farmers in Pakistan and Bangladesh. The training in India is under review.

Selecting suppliers that meet and share our standards

Our global supply chain is large and diverse and our tier one supply chain spans 26 countries. We have implemented a number of measures for supplier selection and ongoing due diligence.

- Our suppliers are responsible for compliance with and implementation of our Supplier Code of Conduct across their supply chain, factories and contractors.
- Suppliers must not source components or materials for use in Primark products that are made using forced or trafficked labour.
- We audit and approve all tier one factories before any orders are placed. Not all factories will pass this audit for approval, meaning we cannot work with them. Once a factory is approved, we then audit them on a regular basis (at least annually).
- Our policy is that all audits are unannounced, apart from the initial audit used to gain approval for Primark production.¹⁵ For these sites, production is only permitted once the ETES team is satisfied that Primark's standards, as set out in our Supplier Code of Conduct, are met.
- All audits include rigorous checks for forced and trafficked labour including a review of relevant documentation, confidential worker interviews, visits to associated production facilities, and worker accommodation if provided by the factory. We refer to the ILO indicators of forced labour for guidance within our ongoing risk analysis activities.
- We may also conduct worker interviews off-site, if necessary, and may use support from NGOs or other experts to carry these out.
- We follow SMETA best practice guidance on the sample number of workers interviewed.¹⁶
- Our own auditors are trained to SA8000 standards and conduct our audits, with the balance of our audits conducted by carefully selected third-party auditors.
- After each audit, the factory is issued with a corrective action plan (CAP) which outlines the areas for improvement. Each item in the CAP is timebound and the CAP contains practical guidance to help factory management implement the recommended action.
- We verify implementation of the CAP through ongoing monitoring, including follow-up audits, spot checks, document reviews and worker interviews.
- Should audits or third-party allegations highlight a severe risk of forced labour, we work with experts to conduct deeper dive assessments. These assessments employ worker-centric and forensic auditing techniques and provide sensitive and tailored remediation and ongoing support for workers.
- If at any point we identify any issues that present a severe and imminent threat to workers' lives or safety, we prioritise these risks for remediation, and the factory is immediately suspended from our purchase order system until we can verify that the issue has been fully addressed.
- Primark is a partner member of the ILO Better Work programme, a collaboration between the ILO and the IFC. Primark factories enrolled in Better Work go through a process of learning that includes assessments, advisory services, industry seminars and training. Conditions and improvements in each factory are assessed by Better Work's enterprise advisors based on the Better Work Compliance Assessment Tool. Assessment results are accessed by Primark in countries including Vietnam and Cambodia.
- In cases where suppliers are either unable to make improvements or lack commitment to do so, we will terminate our relationship.¹⁷
- We view termination as a last resort, and it is an action that is rarely used. In cases involving individual suppliers, we work with the supplier and our commercial teams on a responsibly managed exit plan in line with the ACT on Living Wages (ACT) Responsible Exit Policy. The policy is designed to ensure that, when a commercial relationship with a supplier or factory comes to an end, both the buyer (brand) and the supplier have assessed the risks to workers.

¹⁵ Audits conducted by ILO Better Work are semi-announced.

¹⁶ <https://www.sedex.com/wp-content/uploads/2019/05/SMETA-6.1-Best-Practice-Guidance.pdf>

¹⁷ There may be situations where an inability to conduct due diligence requires us to withdraw from a region, sector or country. In these situations, we will be guided by international frameworks and consultation with all relevant stakeholders.

Unauthorised subcontracting

Unauthorised subcontracting is not permitted and is a breach of Primark's Business Terms and Conditions. Workers in unauthorised factories could be at heightened risk of forced labour.

The Primark ETES team conducts an immediate, unannounced assessment of any factory or production site where unauthorised subcontracting is suspected. The assessment focuses on whether unauthorised subcontracting has taken place and whether there are any severe issues, including forced and child labour, at the unauthorised factory.

If unauthorised subcontracting is confirmed, the approved factory to which the order was raised is suspended from our purchase order system until the supplier and the approved factory can demonstrate their management systems are adequate to manage and prevent any further issues of unauthorised subcontracting.

Where severe issues linked to Primark production are identified at an unauthorised factory, we require the supplier and/or the approved factory to work with us on a remediation programme to ensure issues are addressed, and if this remediation programme fails then we will terminate the relationship.



Our approach to prevention and mitigation of risks

Our due diligence to address the risks of forced labour in our supply chain is tailored to the context and nature of the specific risks, the underlying root causes, the infrastructure, and resources available. It is informed by precedent and best practice, and the expertise of our local team on the ground, as to the most valid and appropriate method.

We use a range of appropriate measures, including corrective action plans resulting from audits and assessments through to outcome-oriented solutions, often in partnership with expert organisations and stakeholders.

A core part of our approaches to preventing and mitigating risk 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 right impact. Many of our partners are grassroots civil society and development organisations and these partnerships represent many years of building trusted relationships through our teams on the ground.

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

Within this statement, we have:

- reported on the key potential and actual risks we have identified within the global garment sector, and the steps we are taking to address these risks, both directly ourselves and with other partners and stakeholders across the industry. See [Annex I – Global risks](#);
- included case studies on selected programmes and initiatives that seek to address modern slavery, decent work, and human rights in the supply chain; and
- reported on the partners and stakeholders we work and consult with as part of due diligence. See [Annex II – Our partnerships](#).

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 as part of our due diligence:

- we support the Employer Pays Principle (EPP), which means that no worker in our supply chain should pay for their job, and that any costs associated with their recruitment must be paid for by the employer. This is stated in our Supplier Code of Conduct;
- our Supplier Code of Conduct permits suppliers 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;
- 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;
- 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; and
- we do not source from supply chains with severe risks of forced labour, including through recruitment practices, and where we are unable to conduct due diligence in full.

Agency and labour providers in Western Europe and the UK

Workers hired through agency and labour providers can be particularly at risk of forced labour. In 2019, we began a programme of enhanced due diligence on agency and labour providers in specific parts of the supply chain where we identified workers were most at risk, which included production, logistics providers, warehouses and recyclers in key countries in Western Europe, including the UK.

Our first objective was to ensure we were identifying and prioritising those workers most at risk of forced labour. Our due diligence looked at the current context in each country (e.g. the prevalence of agency regulations, temporary labour usage trends, proportionality of known migrant worker routes) and enabled us to develop a risk-based prioritisation in consultation with local partners.

Following this, we adapted our audit programme in order to identify risks based on the current context in each country. This included embedding additional key indicators into our audit programme on agency labour, including for example, provision of PPE, transport and accommodation for agency workers, charge rates and types of contracts and service level agreements used, whether collective bargaining agreements differ for temporary workers, and whether temporary workers have access to grievance mechanisms. These key indicators were transposed into questions for workers in multiple languages. We implemented a vulnerability threshold trigger where issues were identified. Where this is the case, we provide tailored remediation and capacity-building support for suppliers to prevent and mitigate the risk of such harms recurring.

My Journey

Middle management plays a critical role in identifying, preventing and mitigating forced labour risks in factories within the supply chain.

Primark identified that middle management was often inadequately informed of forced labour risks and prevention measures. Where training was available to middle management, it was often not sufficiently practical and targeted enough for them to implement changes to their workplace policies and programmes that would address modern slavery.

This was particularly the case for recruitment and hiring processes, where there are indicators of forced labour.

As a response, My Journey was developed and launched by Primark's team in India in 2019. The programme 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 prevent and mitigate them. For example, making sure that all new recruits have contracts that they understand and have not paid recruitment fees to secure their job.

The programme is underpinned by three Golden Rules:

1. No recruitment fees.
2. Accurate information provided to candidates.
3. Free will of applicants and new recruits.

The objectives of My Journey are for:

- recruiters to understand the significance of the three Golden Rules;
- factory management to understand and respect the role of their Human Resources departments in streamlining the recruitment and hiring process through coordination among different departments; and
- factory management to effectively forecast human resource requirements through robust manpower planning.

Participants receive training on the ILO's forced labour indicators, key steps in the recruitment and hiring process (plan, search, select and hire), the risks of forced labour associated with each step, and documenting policy and procedures.

Prior to the delivery of training, Primark's team visits each factory to undertake a due diligence assessment of its current recruitment and hiring processes. Gaps are identified and discussed with management,

and then used to measure subsequent progress throughout the programme. Some of the more common issues identified include:

- a lack of knowledge of the risks of modern slavery, and the legislation covering modern slavery;
- no written policy, processes or procedures on recruitment and hiring; and
- no internal department coordination on manpower planning, often to the exclusion of the Human Resources department.

The due diligence assessments have also revealed isolated but concerning issues such as third-party recruitment agents charging new recruits for a job in the factory, and factories deducting pay from existing workers who recommended new workers who then left the factory before a certain period.

Programme impact

To date, 80 factories have received training and support under the programme.

A survey conducted by the Primark India team across 10 of the participating factories in 2022 found that:

- 67% of the participating factories had developed new recruitment policies and procedures as a result of the programme;
- 33% of the participating factories had modified their existing processes as a result of the programme; and
- 80% of the participating factories had confirmed they had improved interdepartmental and managerial interaction following the training and improving shift planning and coordination among factory departments.



80%

improved interdepartmental and managerial interaction



67%

factories developed new recruitment policies and procedures



33%

modified their existing processes

Due diligence to prevent and mitigate risks

Illustrations produced as training materials under the My Journey programme to support factory managers in understanding and mitigating the risks of forced labour within recruitment and hiring processes:



All workers should be given employee identification upon starting employment.



Workers must be provided with written and understandable information about their employment conditions.



Any fees associated with the recruitment of workers must be paid by the employer, not the worker.

The team also identified various additional impacts across the range of factories:

- the development of an Employee Handbook for prospective employees;
- the involvement of Human Resources and internal recruitment colleagues in the recruitment process;
- specific resourcing within four factories to focus on recruitment, headcount and shift allocation;
- reference guides for recruiters, including training centres on hiring processes;
- compliance checklists to clearly identify renewal of relevant licenses and reports to maintain newly improved processes;
- modification of existing recruitment and hiring policies and procedures, with greater focus on due diligence of external training centres;
- greater clarity on roles and responsibilities related to recruitment and hiring in the factory; and
- translation of appointment letters into local and other languages spoken by workers in the factory.

We continue to learn and evolve to help improve the impact of the programme. For example, the team found that not all participating factories understood the core purpose of the training, and some required additional support from the team.

Looking ahead, the team plans to expand the programme to reach more factories, and to strengthen the ongoing monitoring of processes and outcomes at participating factories as part of its due diligence. Over time, it is essential that more factories take responsibility and ownership for embedding the programme learning into their management systems.

“My Journey is the largest positive turning point for the huge factory like us. Management is always very busy investing in the business, but less focused on Human Resources due to lack of time and clear understanding on how to make improvements. We often hire consultants to do this work who charge very high prices. Through the Primark team’s expertise, local knowledge and understanding of the needs of the factory, we were able to make a massive improvement on recruitment and hiring. This task of process improvement of recruitment and hiring was done not only from management and staff, but also from the workers’ inputs. We didn’t just set new policy, but started by analysing our existing processes, gaps and risks. We discussed this a number of times with the Primark team and from there developed our Recruitment and Hiring Policy which is why it is so effective. This is definitely a very important initiative in business risk management. Thank you for this.”

Participating factory manager

“After My Journey, we developed a new recruitment and hiring policy with clear roles and responsibilities for the personnel involving in the recruitment. Previously, some workers used to directly go to production floor without completing recruitment formalities and we didn’t know about their presence. Now recruitment happens only through HR with clear procedure.”

Participating factory HR manager

Working with partners and stakeholders to increase leverage and improve standards

In total, we engage and partner with over 60 stakeholders – including policymakers, worker rights organisations and civil society groups – and actively participate in multi-stakeholder and industry initiatives at both national and international levels.

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.

Throughout this statement, we have provided case studies and examples of our work with stakeholders and partners and have included a full list of these in [Annex II – Our Partnerships](#).

The PASS programme in partnership with SAVE, supporting workers' access to social security in India

SAVE is an NGO based in South India, and a long-term stakeholder and partner of Primark's. Our engagement with SAVE has helped us to identify where workers are facing risks through their workplace, and the impact of these risks upon workers and their families. This long-term partnership has resulted in several key programmes and initiatives with SAVE, supported by Primark.

The challenge

Workers in factories in South India often face challenges in understanding and accessing their social security entitlements. This means that when workers are facing specific contexts, such as a lack of employment during the pandemic, they are unable to rely on social security for support and face increased risks of poverty and vulnerability.

The solution

SAVE and Primark developed a community-based project called Promoting Access to Social Security (PASS), implemented by SAVE. The project delivered support by developing and managing a network of 84 trained volunteers (including 36 women) who worked to raise awareness of how to access social security entitlements.

The impact

The project ran for three years and was completed in August 2022. It reached over 10,000 workers with 3,504 people (31% women) supported directly on specific issues relating to their social security accounts. 20 workers received cash benefits valued over £7,000 (Rs.685,394).¹⁸

Throughout the project, SAVE advocated to the government on the importance of social protection – for example, through submitting a Right to Information request to the government to understand the claim status of workers in the garment sector.

"I didn't know anything about ESI (Employees State Insurance) and EPF (Employees' Provident Fund) although I'd studied a Master of Social work. I was surprised to learn vast information as well as digital application. Initially it was difficult for me to understand the process of on-line access, slowly by practice, I was able to learn. It took me for about four months to support others."

Ajith, project staff

"I could see the happiness from Murali, Palanisamy and Raju during the COVID-19 pandemic critical situation that they were able to receive 60% of the saving money from EPF to feed their children because of my guidance."

Project volunteer

We continue to support social protection in South India through an in-house, factory-based project called Securing Futures that has been developed by our local team in South India. We are also exploring digital solutions to help workers understand and access their workplace rights with respect to social security.



10,000
workers were reached with this project



3,504
people supported directly on specific issues relating to their social security accounts

¹⁸ This information was provided by Primark's partner – a third party – and has not been assured by Primark.

Within this statement, we have reported on our due diligence on selected issues relating to access to decent work – such as living wages, purchasing practices, and freedom of association – that can contribute to or are related to ILO indicators of forced labour.

Living wages and purchasing practices

In 2021, as part of our Primark Cares strategy, we committed to pursuing a living wage for workers in the supply chain, supported by financial literacy training and access to social protection by 2030.

We recognise the role that purchasing practices play in enabling suppliers to pay a living wage. As a founding member of ACT, we have publicly stated our commitment to ensure our “purchasing practices support long-term partnerships with manufacturers which enable and reward their progress to paying living wages”.

All ACT members have agreed to progressively implement the following specific commitments on purchasing practices across their global supply base by the end of 2023:

- **Wages as itemised costs.**
- **Fair payment terms:** We are signatories to the UK Government Prompt Payment Code and our payment terms are set at 30 days.
- **Better planning and forecasting:** We are committed to increasing our focus on forecasting and planning to provide suppliers with greater certainty on volume commitments so they can plan with confidence. This will play an important role in underpinning our transition to a Living Wage;
- **Surveys on responsible sourcing and buying:** Purchasing Practice surveys both for suppliers and internal buying and merchandising teams were rolled out and completed in April 2021. The results fed into the aggregated report published by ACT in November 2021. A second set of surveys will be conducted in 2023; and
- **Responsible exit strategies:** We implement the ACT Responsible Exit Policy developed in 2019/20. Our Sourcing team conducts reviews with suppliers and factories to understand relative dependencies and risks on both sides, giving our supply chain partners an opportunity to mitigate any impacts where required.

In addition to these commitments, we support our suppliers through the following measures which aim to incentivise good labour practices:

- we build long-term partnerships with suppliers. Our oldest supplier has worked with us for over 24 years and the majority have supplied Primark for over seven years;
- our supplier-balanced scorecard system was developed by Primark’s Sourcing team and is used by sourcing and buying teams to track and monitor how suppliers are meeting our standards on business, quality, delivery and ethical trade including the Supplier Code of Conduct. Ethical trade is one of the highest weighted KPIs;
- we have standard terms of trade that we apply to all our suppliers, fairly and equally;
- we sometimes use off-season factory time for production. This lengthens the lead time and helps a factory to plan its production more effectively, providing the opportunity for stable employment in typically low seasons;
- in general, we do not insist that suppliers use nominated fabric and sundry suppliers, which allows suppliers to remain flexible and cost effective. The exception to this is in the PSCP, where supply chain intermediaries are nominated to ensure traceability; and
- Primark’s ETES team provide support, guidance and assistance for suppliers to meet our standards.

In 2021, we commissioned and funded research by the [Anker Research Institute](#), which works in partnership with the [Global Living Wage Coalition \(GLWC\)](#), to provide new and updated Anker methodology living wage benchmarks for our sourcing markets: Bangladesh, Cambodia, Turkey and Vietnam.

These benchmarks will be available publicly and mean that Primark will, for the first time, have robust and credible living wage benchmarks for a number of sourcing markets. This information is key to enabling us to conduct more robust due diligence on living wages in our supply chain, and to develop and pilot initiatives to bring real wage growth across our supply chain, including being able to track factories’ performance against these benchmarks.

We have committed to capture and publish real wage data for workers in our supply chain. We have tested the [Fair Labor Association \(FLA\) Wage Data Collection Tool](#), which has been adopted by 50 apparel and footwear companies across 33 countries.¹⁹ We plan to pilot it across 30 factories in a number of our key sourcing markets. FLA's Fair Compensation Dashboard allows for analysis of the GLWC estimates, bringing to life the work being done on living wage benchmarks.²⁰

In the future, we hope to explore new ways of working with our suppliers to better support and encourage them towards paying their workers a living wage. This includes building strategic supplier partnerships and being clear that we will increasingly prefer to work with suppliers who share our goals.

Freedom of association and worker representation

We acknowledge and support the enabling right of freedom of association so that workers are aware of and can exercise their fundamental rights at work, and 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, such as a copy of collective bargaining agreements, 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 ILO Better Work and ETI Social Dialogue 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 is found in the table on worker-focused programmes on [page 42](#).

- Ensuring that manufacturers, employer representatives, trade unions and brands are at the same table is the cornerstone of the ACT model. ACT currently operates in three key countries – Bangladesh, Cambodia and Turkey. These were selected based on sizeable sectoral production with considerable presence of ACT members and the potential for trade unions to engage in collective bargaining at industry level. Updates on ACT's activities in these countries can be found on the [ACT website](#).
- Primark engages and works directly with trade unions and other relevant stakeholders to resolve specific issues and grievances. In some cases, we have sought the involvement of national Arbitration Councils, the ILO, and multi-stakeholder initiatives including the ETI. In the year under review, we worked in collaboration with other international brands in South India where there were allegations of unpaid wages in multiple factories, following the revision of the minimum wage. Three of the factories involved were producing for Primark. As part of the collaborative efforts, we ensured that workers received the pay that was owed to them. All workers within the three factories now receive the correct, updated minimum wage. In addition, we are continuing to work with the suppliers to ensure that workers who are no longer employed in the factories are also reimbursed.



¹⁹ The Wage Data Collection Tool is an Excel-based model that is straightforward and scalable, allowing companies to gather worker wage data from apparel and footwear factories. FLA is making this tool publicly available at no cost to companies working to measure the living wage gap in their supply chains. The companion Fair Compensation Dashboard allows companies to analyse average worker wages, measure those wages against living wage benchmarks from more than 30 countries, and track progress over time.

²⁰ The GLWC living wage estimates are region-specific living wage benchmarks used in the Fair Compensation Dashboard to measure the living wage gap.

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](#).

Access to grievance mechanisms

We provide access to grievance mechanisms through several channels:

- directly through the [Customer Service section](#) of our website;
- through our confidential employee whistle-blowing facility;
- through the confidential worker interview process. Interviews with workers are a mandatory part of our ethical trade audit programme and are always held in confidence to protect worker testimony. Where appropriate, we give workers direct contact details for the Primark team so that they can contact us at their own discretion;
- by directly engaging with workers, through our ETES team and our expert partners which run programmes for workers in our supply chain; and
- through supporting and providing external, independent grievance mechanisms for workers.



Enabling workers to raise grievances

Enabling workers and their representatives to raise workplace grievances and legitimate concerns in a safe and confidential way is an essential step in due diligence. Our approach is twofold. We work with suppliers and factories to help them improve their operational-level grievance mechanisms (OLGM) as required under our Supplier Code of Conduct, and we support existing and new industry-wide external, independent grievance mechanisms.

In all our approaches to supporting workers to access grievance mechanisms, we seek to apply the following principles:

- alignment with the UNGPs on effective grievance mechanisms;²¹
- supporting and engaging with existing dialogue structures and in line with our Supplier Code of Conduct and international conventions, ensuring that we do not replace or undermine the role of legitimate worker organisations;
- where freedom of association is restricted and where trade unions face significant challenges to carry out their legitimate activity, the aim is to give workers a grievance mechanism where concerns can be raised in confidence – tailoring our approach to meet country-specific needs and circumstances;
- focusing on where workers are most vulnerable, e.g. refugees, young workers, migrant workers, hostel residents;
- avoiding duplication by mapping and identifying existing and effective mechanisms; and
- supporting rather than undermining factory level OLGMs.

Operational-level grievance mechanisms

OLGMs operate at the factory or site level and are often the first entry point for a worker to raise concerns.²² Our Supplier Code of Conduct requires suppliers to implement OLGMs. The 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.

Within our Ethical Trade audit programme, we have begun to monitor how suppliers are putting in place the necessary systems to meet these requirements. The most appropriate type of mechanism will depend on the country and the local context. Factory capacity methodologies and support provided by Primark varies depending on our business leverage, factory capacity and willingness to implement interventions, and the presence and efficacy of legally required grievance mechanisms.

We have learnt that audit findings in other areas may also indicate weaknesses in an OLGM. For example, a weak occupational health and safety (OHS) system can be an indication of the lack of proper reporting by workers on OHS issues.

With a commitment to safeguarding workers, we understand and respect the importance of data protection issues that arise from our programme, and we comply with all relevant legislation.

²¹ https://www.ohchr.org/documents/publications/guidingprinciplesbusinessshr_en.pdf

²² OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector

External grievance mechanisms

Access for workers to external, independent, or multi-stakeholder-led grievance mechanisms can be particularly effective where there are vulnerable workers and/or the mechanism is tailored to specific risks, such as forced labour.

Where possible, we seek to support workers to access these mechanisms, often by raising worker awareness of mechanisms to build understanding and trust among workers. In addition to support, we also invest in an existing grievance mechanism or design additional independent mechanisms in partnership with experts. These include the Occupational Safety and Health Complaints Mechanism of the Accord (Bangladesh), Amader Kotha Hotline (Bangladesh), the ACT Interim Dispute Resolution Mechanism (Bangladesh), and ISCSI Destek Worker Support Centre (Turkey).

Grievance mechanisms to address GBVH

Our engagement on grievance mechanisms to address GBVH includes strengthening workplace committees as formal mechanisms through which issues can be reported, investigated and remediated. This includes projects to support GBHV committees in India and Bangladesh.

Given the multiple sensitivities and importance of confidentiality, reporting on GBHV remains a challenge globally. In a project evaluation of our STOP partnership in Cambodia and Vietnam, NGO partner Care International reflected that low reporting was due to victims “not being confident enough to report it or not believing that their case is ‘serious’ enough or occurs often enough to report it”.

We are drawing on our collective learning as well as accessing external expertise to help us understand how best to respond to such cases. Success requires commitment from management, policies that are implemented, and workers’ trust and confidence in the process.

Providing for or cooperating in remediation when appropriate

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. For example, in 2022 we continued to develop our approach to the remediation of child labour. We regularly share information on our experiences and the challenges of effective remedy within our sector, or directly on our website, through reports to stakeholders and through industry forums such as the ETI and the OECD.

Amader Kotha, Bangladesh

Amader Kotha is a grievance mechanism established in 2014 for workers to report grievances in the garment sector in Bangladesh. It was initially established as a project of the Alliance for Bangladesh Worker Safety, following the Rana Plaza tragedy; but in 2018, it became an independent grievance mechanism available to all garment workers in Bangladesh with the support of factories and international brands and retailers. The helpline is run in collaboration with Bangladesh NGO Phulki and technical partners.

The Bangladesh Primark team regularly visits factories to raise workers' awareness of the hotline and to listen to management feedback. The team provides ongoing engagement and refresher training to help workers, especially those who have recently joined. Between May and September 2022, the team trained over 4,000 workers and 140 managers at 25 factories.

Some factory management are initially hesitant about enrolling in the mechanism, fearing it will exacerbate worker unrest and discontent; but this view, in our experience, shifts over time.

“We were reluctant to join this project as we were afraid the project may spread more rumours and increase worker unrest in the factory. But once the project started, we found the helpline resolved small and day-to-day queries of workers and ultimately reduced worker unrest in the factory.”

Factory manager

In November 2021, Primark worked with Elevate, a technical partner for the mechanism, to deploy a worker survey at 14 factories enrolled in the helpline. The purpose of the survey was to capture worker insights on their awareness and sentiment around procedures for workplace grievance handling – in particular, the Amader Kotha helpline. The results showed that most surveyed workers have access to grievance mechanisms that they trust. However, while 86% of respondents stated that they were comfortable using the Amader Kotha helpline, 81% of respondents said they were concerned about management retaliation when filing a grievance.

Between August 2021 and August 2022, 1,209 substantive calls (genuine grievances) were made from workers in the Primark supply chain. Of these, 40 were escalated to Primark; and, as of the end of September 2022, six were outstanding.²³

Grievances related to wages and benefits in Bangladesh

In March 2021, seven workers at a factory reported that they had not received their earned leave (EL) for 2020. When a worker completes one year of continuous work, they are entitled to one day of leave for every 18 days they work, under Bangladesh Labour law. Factories should also pay half of EL to workers within a year of it being earned.

The workers had already raised the issue internally to management and were told that management were in the process of deciding how to proceed. The workers called the Amader Kotha helpline to raise a grievance when they had still not heard back from management.

An investigation found that, due to COVID-19, some factories were not fulfilling their legal requirement on EL. Phulki reached out to the factory to follow up on behalf of the workers. The factory agreed to make payments and later confirmed these were made. Phulki also followed up with the workers to confirm this.

In June 2021, the Amader Kotha helpline received eight calls from workers who had not received the second instalment of their maternity leave benefit. The payment was almost three months overdue.

Phulki and Primark followed up with the factory to investigate. The factory said that they faced a temporary financial crisis because payments from their customers (international brands) were late and committed to paying the instalments within the next few months. The following month, the factory sent an update that payments had been made and the workers confirmed receiving payment.

Grievances related to harassment

In May 2021, a worker called on behalf of all the female workers working on her factory floor to report that a finishing supervisor was sexually harassing workers. The worker said she did not feel comfortable raising it within the factory, so she called Amader Kotha helpline.

After the issue was reported to Amader Kotha, the factory was given eight days to demonstrate appropriate action to rectify the issue. An investigation was conducted, and the factory suspended the supervisor during the period of the investigation. Following investigations, the supervisor was formally dismissed.

²³ This information was provided by Primark's partner – a third party – and has not been assured by Primark. Primark continues to work with its partners to resolve any outstanding grievances.

Tracking and monitoring

Throughout our programme, we monitor the steps we take to address forced labour 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, and the number of workers in those factories;
- recorded grievances received and resolved, both across all issues and those related to modern slavery; and
- the number of initiatives (programmes and projects) implemented across factories in our supply chain.

All our programmes and projects are reviewed through a Monitoring, Learning and Evaluation (MLE) framework. We have also started working with social impact measurement experts, Tandem and 60 Decibels, to strengthen our measurement approach and to understand the effectiveness of our programmes in line with international best practice. Listening to workers involved is an essential part of this. The framework will deliver a clear indication of each initiative's successes and setbacks, so that we can learn, develop and improve them.



Annexes

Global risks within the garment sector

Our due diligence process has identified potential and actual risks of forced labour within the global garment and footwear sector. Many of these risks are systemic and endemic to a particular region, country or worker population and present in other sectors. We have outlined steps we are taking as part of our due diligence process to prevent and mitigate these risks.

Agency labour in supply chains

Agency workers are at risk of forced labour across all industries and sectors. Within the garment and footwear sector, many sites that use agency labour in the UK and EU – particularly in the warehousing and distribution sector – have never been required to include agency labour in the scope of their customers' ethical trade audits.

Our actions taken to address these risks:

- identifying where agency labour exists in our supply chain;
- heightened due diligence on agency and labour providers in production, logistics providers, warehouses and recyclers across key countries in Western Europe, including the UK and North Africa;
- regular assessments of workplaces and of employment conditions where agency labour is used;
- corrective action programmes at individual site level;
- face-to-face training for UK suppliers; and
- ban on sourcing garments manufactured in the UK.

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 traceability of cotton within our Primark Sustainable Cotton Programme (PSCP).

Our actions taken to address these risks:

- training for almost 252,800 farmers through the PSCP;
- working with the ginners and spinners to segregate and trace PSCP cotton, and increasing the roll-out of due diligence on gins and spinning mills used in the PSCP supply chain;

- mandating that suppliers must not source cotton from the Xinjiang Uyghur Autonomous Region (XUAR);
- supporting the development of a traceability and transparency tool focusing on cotton supply chains;
- spot checks using a forensic technology tool (Oritain), on a sample basis, to confirm the provenance of the cotton from within PSCP using forensic science techniques; and
- developing a human rights due diligence assessment pilot to support the implementation of our Supply Chain Human Rights Policy in a cotton supply chain in Turkey.

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:

- 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 has now ended, as of March 2022, we continue to prohibit the use of cotton from these countries until such time that we are confident the risks of forced labour can be managed appropriately;
- regular communication to suppliers to ensure the prohibition is implemented;
- on-the-ground checks in spinning mills in Bangladesh, India and Pakistan to assess origin of cotton bales; and
- engagement with key stakeholders working on policy and campaigns.

Forced labour in China

There are widespread and credible reports of forced labour in China in the production of goods across multiple sectors and industries. The UN found that “serious human rights violations have been committed” against Uyghur and ethnic minorities in Xinjiang Uyghur Autonomous Region (XUAR) and other provinces of China by the Chinese government which may “may constitute international crimes, in particular crimes against humanity”. This includes large-scale arbitrary deprivation of liberty and forced labour.²⁴

Our actions taken to address these risks:

- enhanced due diligence to increase understanding of the risks within the supply chain in China;
- zero tolerance on the use of any forced or prison labour;
- audit frequency was changed from yearly to every six months;
- zero tolerance on the use of any production inputs (covering all tiers of the supply chain and production processes, and all materials) from the XUAR;
- zero tolerance on the use of forced labour from XUAR within supply chains in China;
- immediate suspension for any sites found using unauthorised subcontracting;
- engagement with stakeholders – including civil society, governments, brands, industry associations – to discuss appropriate routes for remedy and prevention;
- training for Primark’s team on the ground on ILO Forced Labour indicators and regional context;
- supporting the development of a traceability and transparency tool focusing in the first instance on cotton supply chains; and
- spot checks using a forensic technology tool (Oritain), on a sample basis, to confirm the provenance of the cotton from within our programme using forensic science techniques.

North Korean workers

There are widespread and credible reports of North Korean workers being sent by the North Korean government as forced labour across multiple sectors and industries.

Our actions taken to address these risks:

- zero tolerance of any labour from North Korea; and
- audits and assessments as part of due diligence at site level to assess for risks.

Myanmar

The ETI-commissioned enhanced due diligence report into Myanmar following the military coup of 2021 found severe human rights abuses which included pervasive forced labour.

Our actions:

- supported the ETI for an independent enhanced due diligence sectoral assessment of the human rights situation in Myanmar;
- announced a responsible exit of our supply chain from Myanmar in October 2022, to be managed in close collaboration with Primark’s local and international partners and stakeholders, including global trade unions, aligned line with the UNGPs;
- increased the number of our ETES team from three to eight to enable us to monitor conditions in our factories as part of the exit process; and
- continued engagement with local partners, including SMART and Women Win, on how to protect workers and increase our visibility on the ground.

Overtime in Moroccan garment factories

Audits of Primark’s suppliers’ factories in Morocco, in 2019, identified that workers were not being paid overtime premiums and on a monthly basis due to a conflicting interpretation of Moroccan labour law.

Our actions taken to address these risks:

- Primark’s position on the interpretation of the law was clarified by legal consultation and feedback from the ETI;

24 <https://www.ohchr.org/sites/default/files/documents/countries/2022-08-31/22-08-31-final-assesment.pdf>

- suppliers were informed and sourcing decisions guided accordingly;
- factory policy and contracts were updated to align with our Supplier Code of Conduct on overtime and working hours;
- factories are audited and only approved once overtime premiums are paid to workers for the period worked; and
- further clarification is being sought on the delayed payment of overtime, where overtime pay is accrued and paid every six months, rather than monthly.

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 for example, limited knowledge of rights and education, economic choices and issues of communication due to different languages spoken. Those from lower castes or marginal ethnic groups are particularly at risk.

Our work in this area has sought to address the touchpoints in the supply chain where the risks of modern slavery are heightened, including recruitment, and hiring practices in the workplace.

Our actions taken to address these risks:

- Primark's My Journey programme implemented in mills to address recruitment and hiring practices;
- encouraging factories to recruit management and other staff that can communicate with migrant workers such as migrant worker coordinators; and
- 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.

Precarious work in supply chains impacted by COVID-19

There have been credible accounts of garment workers not receiving full payment of wages, benefits and severance owed to them during the COVID-19 pandemic, and manufacturers dismissing and then rehiring workers at lower rates of pay.²⁵

Our actions taken to address these risks:

- engagement with trade unions and suppliers;
- monitoring factories' alignment with our Supplier Code of Conduct legal requirements on providing workers with notice;
- corrective action programmes at individual site level, including appropriate severance pay for affected individuals; and
- engagement with international brands and stakeholders to discuss collaborative efforts.

Undocumented workers in Turkey

Undocumented foreign workers in Turkey, 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:

- partnership programme with expert NGOs since 2016 to provide support and remedy for any undocumented refugees and foreign workers;
- monitoring through audits and factory checks at factory and subcontractor level;
- corrective action programmes at individual factory level where workers are identified; and
- suspension of all factories suspected of using undisclosed subcontracting.

Migration from the Ukraine

Foreign workers from Ukraine, fleeing conflict, could potentially be at risk of exploitation in destination countries. We monitor carefully for this risk and, so far, have not identified any issues. However, we continue to keep a watching brief on this issue. We have learnt from our experiences in Turkey (see above) that a worker-centric approach is the right approach, while ensuring our suppliers are aware of and are implementing our requirements as set out in our Supplier Code of Conduct, for all workers equally and without discrimination.

²⁵ https://media.business-humanrights.org/media/documents/Unpaid_wages_v9.pdf

Annex II – Our partnerships

[Click here for contents](#)

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

[Click here for contents](#)

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



Spotlight on Syrian refugees in Turkey

Recognising the specific vulnerabilities of Syrian refugees in the supply chain in Turkey, at the beginning of 2022, we strengthened our partnership with local NGO, United Work. Through helping factories to find qualified refugee workers, supporting the streamlining and simplification of bureaucratic processes and providing worker training, the project aims to increase the number of refugees employed in the supply chain and ensure conditions of decent work.

Training topics delivered by United Work to Syrian refugees employed in garment factories include: differences and similarities between cultures; communication; written and unwritten Turkish business rules; basic labour law; workers' rights and duties; and safety and security in the workplace. A key focus, and challenge, of the partnership is helping Syrian refugees to access formal work permits. Official figures and the findings of our local team both point to the difficulties that Syrian refugees face in this undertaking.

Since the partnership began, United Work has facilitated the recruitment of 43 Syrian refugees across six factories in Primark's supply chain. The project has been positively received, both by workers and employers. Syrian refugees have been provided with an opportunity of decent work and employers have found it has helped their workforce needs. The project is not without its challenges – delays in securing work permits can be substantial and, at times, have disrupted the placement process and caused refugees to seek alternative job opportunities.

Spotlight on worker safety

In Bangladesh, Primark was one of the first brands to sign up to the Bangladesh Accord on Fire and Building Safety (the Accord) in 2014. The Accord's obligations in Bangladesh in respect of inspections, remediation and workplace programmes are now implemented through the RMG Sustainability Council (RSC), and we work in close partnership with the RSC. In June 2021, Primark signed the new International Accord for Health and Safety in the Textile and Garment Industry – a binding agreement between brands, IndustriALL Global Union and UNI Global Union.

Spotlight on tackling GBVH in Turkey

As part of our work to help tackle GBVH in our supply chain in Turkey, we partnered with a local NGO called ACEV to help factory management understand gender inequality and how to address it.

As a pilot, in November 2021, representatives from three Primark suppliers and five factories attended 28 hours of training across a range of related topics such as gender, discrimination, sexism, gender equality in the workplace and organisational change.

Participants were then given two months to develop an action plan to address gender inequality. Feedback from the training was positive, with 85% of participants reporting they had identified gender equality in contexts they would not have previously considered. 81% said that they had taken steps to improve gender equality in the workplace since the training.

In the following months all the factories developed action plans, and actions taken have included changing factory signage, training workers on GBVH in the workplace with a local partner and proactive recruitment to increase female representation at management level and in male-dominant departments.

Ownership and engagement of the factories has been strong, and our team continues to follow up with the participating factories.

The project, now named 'Snowball', continues to develop. Recently we delivered the first factory Equality for Men Workshop with 15 male supervisors. During the workshop, specifically designed brochures were disseminated with 11 tips for gender equality.

Future plans include taking this workshop to more factories and holding a Monitoring Workshop for Equitable Transformations to help factories understand how to monitor and manage their action plans, including improving their data collection systems.

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

Audit indicators

- 83% of tier one suppliers' factories audited in calendar year 2021.²⁶
- 93% of audits that were unannounced (apart from initial preproduction audits).²⁷
- 2,471 Number of audits in calendar year 2021.²⁸
- 0.32% of non-compliances under clause Employment is Freely Chosen of our Supplier Code of Conduct in calendar year 2021.²⁹
- 0.12% of non-compliances under clause Employment is Freely Chosen of our Supplier Code of Conduct which were resolved in calendar year 2021.
- 39 Number of incidents of unauthorised sub-contracting in the calendar year 2021.

Initiatives (programmes and projects)

Number of initiatives supporting access to social protection and financial education and services, and % of workers in our finished goods supply chain in participating factories.

Between April 2018 and the end of July 2022, four initiatives supported access to social protection and financial education and services. 271 factories received support, representing 30% of total factories and 8% of total workers (43,825 workers).

Number of initiatives supporting skills development and % of female workers in our finished goods supply chain in participating factories.

Between December 2015 and end of July 2022, six initiatives supported female workers in our finished goods supply chain factories with skills development. 69 factories received support, representing 8% of total factories and 27% of total female workers (86,241 female workers).

Number of factories participating in the Sudokkho initiative and % of female workers in the Bangladesh finished goods supply chain trained.

Between December 2015 and end of July 2022, Sudokkho supported 36 factories in our Bangladesh finished goods supply chain with skills development, representing 36% of total factories in Bangladesh and 40% of total female workers in Bangladesh (61,911 female workers), with 914 workers directly trained and 9,493 workers indirectly trained.

Number of initiatives supporting efforts to address GBVH, and % of workers in our finished goods supply chain in participating factories.

Between October 2019 and the end of July 2022, four initiatives supported efforts to address GBVH. 27 factories received support, representing 3% of total factories and 5% of total workers (31,771 workers).

Number of initiatives supporting the development of effective grievance mechanisms, and % of workers in our finished goods supply chain in participating factories.

Between October 2020 and end of July 2022, five initiatives supported our finished goods supply chain factories to develop effective grievance mechanisms. 73 factories received support, representing 8% of total factories and 23% of total workers (133,127 workers).

Number of initiatives supporting improvements to workers' physical and mental health and wellbeing, and % of workers in our finished goods supply chain in participating factories.

Between October 2016 and the end of July 2022, five initiatives supported improvements to workers' physical and mental health and wellbeing. 121 factories received support, representing 13% of total factories and 27% of total workers (158,962 workers).

26 This is an increase from previous year due to the reductions in Covid restrictions. During 2021/2022, the number was reduced due to restrictions from COVID-19 in our key sourcing markets.

27 This is an increase from previous year due to the reductions in Covid restrictions.

28 This data has been assured by KPMG.

29 The methodology used for non-compliance clauses is Forced Labour, 'Employment is Freely Chosen'. This will be reviewed over the coming year so we can include non-conformances more accurately in line with what a forced labour indicator is.

Supporting workers to access external independent grievance mechanisms

Country	Bangladesh
Mechanism	Occupational Safety and Health Complaints Mechanisms
Provider	Bangladesh RMG Sustainability Council
Coverage	106 factories ³⁰
Scope	OHS
KPIs	15 grievances were raised. The majority were in relation to wages and benefits.

Country	Bangladesh
Mechanism	Amader Kotha Helpline
Provider	Clear Voice, Phuki, Elevate
Coverage	50 factories ³¹
Scope	Safety and labour issues
KPIs	Between August 2021 and August 2022, 1,209 substantive calls (genuine grievances) were made from workers in the Primark supply chain. Of these, 40 were escalated to Primark; and, as of end of September 2022, six were outstanding. ³²

Country	Bangladesh
Mechanism	ACT Interim Dispute Resolution Mechanism (DRM)
Provider	ACT, BAWF, NGWF, AGWF
Coverage	106 factories ³³
KPIs	In 2021, three cases were raised through this mechanism, and all were relating to wages and benefits and were resolved as per the agreed ACT process. In 2022, six were outstanding.

Country	Turkey
Mechanism	ISCSI Destek Worker Support Centre
Provider	MUDEM
Coverage	13 factories which have Syrian workers ³⁴
Scope	Labour rights for Syrian workers in Turkey
KPIs	In 2022, one case was raised from a worker involving one undocumented foreign worker and one child labourer, both of which were confirmed and remediated.

Data on grievances 2021/2022

Grievance mechanism³⁵

Open/Pending	18
Resolved	32
Total	50

Grievances related to issues of forced labour

Open/Pending	2
Resolved	1
Total	3

30 There are 106 factories on the grievance mechanism, of a total out of 171 tier 1 factories declared to the RMG Sustainability Council (RSC).

31 There are 53 factories on the grievance mechanism, out of a total of 66 factories.

32 This information was provided by Primark's partner – a third party – and has not been assured by Primark.

33 There are 106 factories on the grievance mechanism, out of a total of 171 tier 1 factories declared to the RMG Sustainability Council (RSC).

34 There are 16 factories on the grievance mechanism, out of a total of 33 factories.

35 These figures do not include the grievances raised through external independent grievance mechanisms. The figures do include grievances raised through other channels, such as those raised to auditors or through the customer service section of our website.

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

Primark is a partner member of the ILO Better Work programme which operates in key sourcing countries.

Better Work conducts monitoring of sites and provides capacity building for management and workers, including offering training on preventing and addressing sexual harassment for workers, middle managers and supervisors. Central to Better Work is the establishment of factory committees to support worker-manager communication. Women are highly encouraged to join the committees and at least 50% of members must be female. Better Work has designed a programme to help female workers deal with situations in the workplace and develop leadership skills that they use to better represent themselves and their colleagues. The programme has also helped women to address the resistance they often receive from family members to join factory committees.³⁶

Implementation partner: ILO Better Work

ETI Social Dialogue, Bangladesh (2016–present)

The ETI's Social Dialogue programme in Bangladesh strengthens the capacity of worker participation committees and helps workers and management understand their rights and responsibilities.

Project partner: Ethical Trading Initiative (ETI)

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.

Project 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 building and providing counselling services in factories, including training factory-based counsellors.

Project partner: St John's Medical College

Promising Futures, China (2018–present)

The Promising Futures programme for workers in China aims to raise awareness and understanding of China's complex social insurance system among workers and factory management, and support access to social insurance.

Project partner: Carnstone

Company IQ, China (2018–present)

Support for factories to implement use of a mobile app that helps to improve transparency of human resources practices, facilitate better communication between management and workers and provide training for workers on multiple topics, including labour rights. The app also provides a function for workers to raise grievances.

Project partner: MicroBenefits

STOP Project, Cambodia, Vietnam (2019–present)

The Enhancing Women's Voice to STOP sexual harassment (STOP) project programme with Care International develops, tests and adapts workplace models for preventing and responding to sexual harassment. The project focuses on supporting factories to establish and maintain effective workplace mechanisms to prevent and respond to sexual harassment.

Project partner: Care International

³⁶ <https://betterwork.org/wp-content/uploads/2020/01/SHP-Thematic-Brief.pdf>

PASS, India (2019–August 2022)

PASS (Promoting Access to Social Security) provides education and practical support to help garment workers in Tirupur, Tamil Nadu, many of whom are migrant workers, gain access to their Employees Provident Fund (EPF) and Employees State Insurance (ESI) health scheme. Such schemes ensure that workers are more financially resilient, particularly during vulnerable periods.

Project partner: Social Awareness and Voluntary Education (SAVE)

Seth Yerng – Our Rights, Cambodia (2021–Nov 2022)

Seth Yerng is a worker app programme delivered in partnership with the Deutsche Gesellschaft für Internationale Zusammenarbeit GmbH (GIZ) – a German development agency – and other international brands. The app provides workers with information about the most important labour laws and occupational health and safety regulations in the workplace in an interactive manner. The app also contains a wage calculator to help workers understand how their wages are determined.

Project partner: German Development Cooperation (GIZ)

My Life, Myanmar (2019–present)

My Life (Myanmar) delivers in-factory training on life skills such as workplace rights and responsibilities, communication and health, using play-based learning to roll the training out to workers.

Project partners: Women Win, Girl Determined

My Journey, India (2019–present)

The My Journey programme 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.

Project partner: none

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.

Project partner: Rajesh Bheda Consultant (RBC)

The Bridging Solution, Bangladesh (2022–present)

Collaboration with ILO and other brands to pilot a new Employment Injury Scheme (EIS) for garment workers.

Project partner: ILO

Securing Futures, India (2022–present)

Securing Futures trains selected factory representatives to create workers' awareness on and to access social insurance benefits.

Project partner: none

HERessentials, Pakistan (2021–present)

HERessentials provides gender equality training sessions on tablets, covering wage management, personal health and domestic violence.

Project partner: Business for Social Responsibility (BSR)

This project ran until 2022.

Drama for Change, Vietnam (2022–present)

The Drama for Change programme is in collaboration with a Vietnamese theatre company which wrote and performed a play about a female worker's experience of sexual harassment in the workplace

Project partner: Atelier Theatre et Arts (ATH)

Respectful Workplace Programme, Vietnam (2022–present)

IFC will provide training, training material and coaching support to four cohorts of trainers at supplier level. Up to 25 participants from each supplier will engage with the various phases of the project

Project partner: International Finance Corporation (IFC)

Gender Sensitive Workplace Programme, Bangladesh (2020–present)

Gender Sensitive Workplace Programme promotes gender-friendly workplaces through gender sensitisation training and the creation of sexual harassment complaint committees.

Project partner: Ethical Trading Initiative (ETI)

Snowball, Turkey (2021–present)

Snowball supports gender equality through training factory management and workers and supporting the development and monitoring of factory gender equality plans.

Project partner: Mother Child Education Foundation (ACEV)

JustMaxIt, Turkey (2022–present)

JustMaxIt minimises gaps, strengthens communication channels between workers and management and, as an outcome of social dialogue, empower workers to raise and negotiate issues in a more informed way.

Project partner: JustMaxIt

Refugee Recruitment Support, Turkey (2022–present)

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

Project partner: United Work

SMART, Myanmar (2021–present)

SMART provides training and coaching for factories across several topics including social assessment, worker/management committees (WCC) including elections, supervisory skills training and applied labour law, social dialogue, HR and OSH.

Project partner: SMART Myanmar

Refugee Support Programme Hotline, Turkey (2020–present)

Refugee Support Programme Hotline supports Syrian refugees to access legal services, language assistance and worker rights information, including a GM hotline.

Project partner: Refugee Support Center (MUDEM)

Grievance Management Project, Pakistan (2022–present)

Grievance Management Project supports textile factories in setting up functioning internal complaints structures and developing their existing grievance mechanisms.

Project partners: German Development Cooperation (GIZ), Fairtrade Germany

This project ran until 2022.

Moner Kotha, Bangladesh (2022–present)

Moner Kotha establishes basic counselling services in factories by training selected factory staff using medical professionals and engaging with workers and managers to reduce the stigma around mental health.

Project partners: British Asian Trust, Sajida Foundation

