

PRIMARK SUSTAINABILITY AND ETHICS PROGRESS REPORT 2022/23

 PRIMARK® CARES



ABOUT OUR REPORTING

This Sustainability and Ethics Progress Report was published in November 2023 and, unless otherwise indicated, the information and data recorded relates to the period from 1 August 2022 to 31 July 2023.

The below metrics have been independently assured by Ernst & Young (EY) against the International Federation of Accountants' International Standard on Assurance Engagements Other than Audits or Reviews of Historical Financial Information – known as ISAE 3000 (Revised). These are highlighted in this report with the symbol Δ.

Basis of reporting information for the metrics listed below can be found [here](#).

- Percentage of Primark's clothes containing cotton that is organic, recycled or sourced from the Primark Sustainable Cotton Programme (PSCP)
- Percentage of Primark's clothing unit sales containing recycled or more sustainably sourced materials
- Number of farmers trained in the Primark Sustainable Cotton Programme (PSCP)

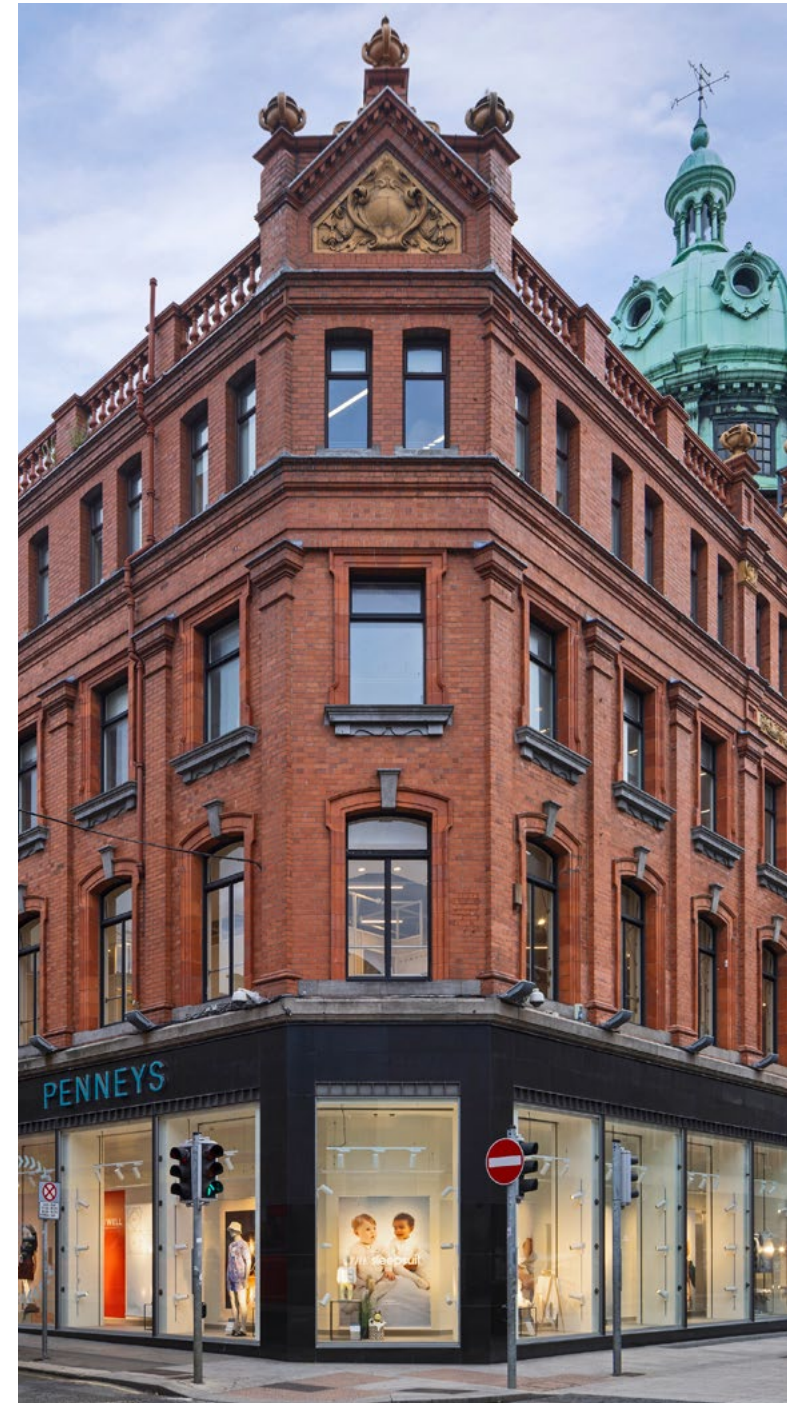
As a division of Associated British Foods plc (ABF), we contribute to the [ABF Annual Report](#) and [Responsibility Report](#). We also contribute to the ABF Carbon Disclosure Project (CDP) and [Task Force on Climate-related Financial Disclosures \(TCFD\)](#) submission. Our greenhouse gas emissions reduction target has been assessed and validated by the [Science Based Targets initiative \(SBTi\)](#), highlighting that our target is supported by the latest climate science criteria and recommendations. More information can be found later in the report [here](#).

Reporting methodology information for our carbon reporting can be found on pages 92 – 93 of the [ABF Responsibility Report 2023](#).

- Percentage change carbon emissions across our value chain against Y18/19 baseline
- Scope 3 emissions
- Total emissions (Scope 1, 2 and 3)
- Number of countries of operation

In line with the UK Modern Slavery Act, we publish a [Modern Slavery Statement](#) annually. This sets out the measures we have taken during the past year to mitigate against the risks of modern day slavery and human trafficking in our supply chain or within our operations.

Our [website](#) also provides details of our approach and is regularly updated to highlight any new initiatives. We also regularly report through partner and third-party benchmarks. More information on our reporting can be found [here](#).





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ABOUT PRIMARK

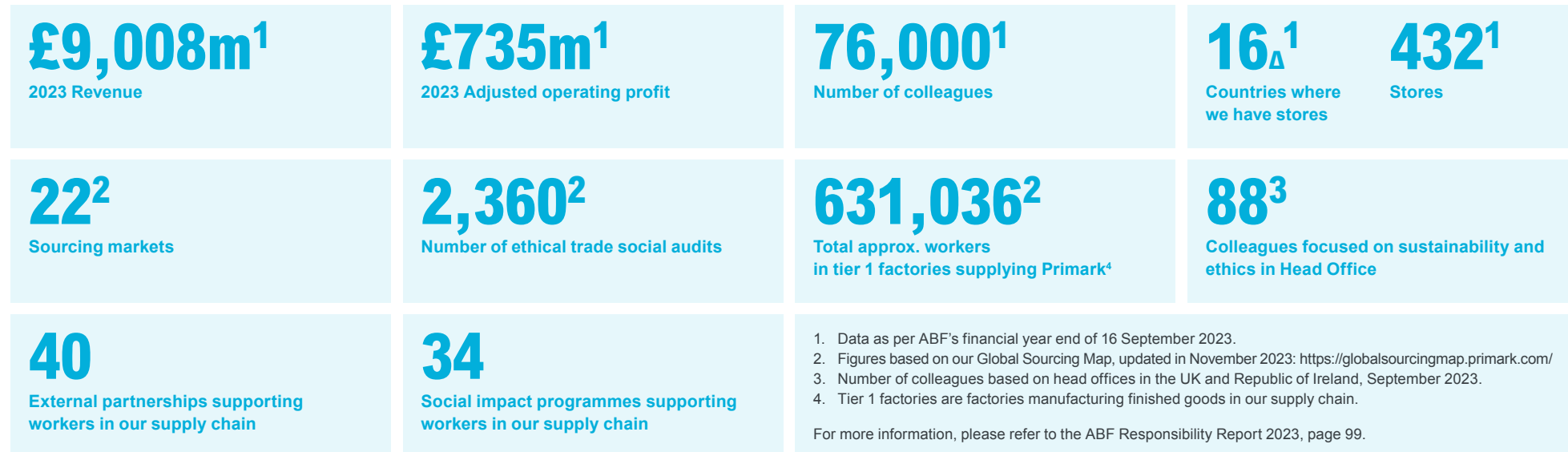
Primark is an international retailer employing 76,000 colleagues across 16Δ countries in Europe and the US. Founded in Ireland in 1969 under the Penneys brand, Primark aims to provide affordable choices for everyone, from great quality everyday essentials to stand-out style across: womenswear, menswear and kidswear, as well as beauty, homeware and accessories. With a focus on creating great retail experiences, Primark has 432 stores internationally and continues to expand across new and existing markets with the aim of reaching 530 stores by the end of 2026.

Primark has a unique business model, one that has been honed and refined over the past 50 years. Affordability for our customers sits at the heart of this. Supported by our retail footprint, Primark is designed to be lean and simple. We have one centralised Product function, so customers will find the same ranges – adapted for local preferences – across all 16Δ markets where our stores are located. We buy at scale which helps make our lower

prices possible. This approach also extends across our operating model. We work hard to minimise the steps between the factory and shop floor and we use very little, expensive air freight. Our labels and packaging are minimal to keep our packaging costs, and therefore customer prices, down. All of this is underpinned by our commitment to responsible business practices towards the suppliers we work with, the workers who make our clothes and the colleagues who operate our stores. We succeed by staying close to our customers, through our retail colleagues, improved customer website and social media followers. We're currently trialling a Click and Collect service in select stores in the UK, where products are available to collect in-store. While this offers customers more choice, in particular across some of our smaller stores, the approach doesn't have the complexity, costs or carbon footprint of a home delivery model.

ABOUT ASSOCIATED BRITISH FOODS PLC

Our parent company ABF, which founded Primark in 1969, was established in 1935 as a bakery business. Since then, it has grown and diversified to become an international food, ingredients and retail group, which employs over 133,000 people in 55 countries. We share ABF's belief that acting responsibly and with integrity is the only way to build and manage a business over the long term. We share a rigorous commitment to ethical conduct and responsible business practices towards people and the planet. We also strive to be a good neighbour and to contribute positively to the communities in which we operate, while recognising our wider obligations to society as a whole.



2022/23 HIGHLIGHTS AT A GLANCE



PRODUCT

55% Δ
of our clothing units sold contained recycled or more sustainably sourced materials.

46% Δ
of our cotton clothing units sold contained cotton that was **organic, recycled** or sourced from our **Primark Sustainable Cotton Programme**

We launched our new **Circular Product Standard** and circular design training to colleagues

We've scaled up our extended durability wash testing to cover **39% of all our clothing** and 57% of denim tested met the highest level under our enhanced wash framework

We rolled out our **traceability and compliance** platform, TrusTrace, to help gather data from the full supply chain of the product, from raw materials to finished product



PLANET

Our near-term greenhouse gas emissions target was approved by the **Science Based Targets initiative**

We created a **biodiversity monitoring framework** and began piloting the methodology in selected farms at our Primark Sustainable Cotton Programme

Approximately 70% of our stores are now powered by renewable or low-carbon electricity and **141 stores** have switched to energy-efficient lighting

Since 2019, we estimate we have removed and/ or avoided over **1 billion units** of single-use plastic (SUP) from our business

We marked **10 years** of our Primark Sustainable Cotton Programme and have trained **299,388 Δ ⁵ farmers** through the programme



PEOPLE

This year, the Sudokkho skills development programme has been run in 17 factories in Bangladesh. These factories represent **29,224 female workers**

We're using the **Fair Labor Association's Fair Compensation Toolkit** to collect wage data in factories across Bangladesh, Cambodia, India and Turkey

This year, My Life India has helped vulnerable workers understand more about their rights in 7 factories. These factories represent over **4,000 workers**

We have six initiatives supporting effective grievance mechanisms across **91 factories, representing 187,657 and 30%** of workers across our finished goods supply chain



OUR PEOPLE

We gathered feedback from over **50,000 colleagues** on their experience at Primark through our bi-annual Your Voice survey

We made **2,657 promotions** across the business this year

We donated £150,000 to support ILGA World in its efforts to advance equity and equality for LGBTQI+ people everywhere

We launched a new **three-year partnership with WorkEqual** to support them in their goal to remove barriers to career progression for women in Ireland

5. Farmers trained includes farmers that are already being trained and those that have completed training under the programme.

INTRODUCTION FROM PAUL MARCHANT, PRIMARK'S CHIEF EXECUTIVE



Paul has been at the helm for almost 15 years. Under his leadership Primark has built its ethical and sustainable foundations and capabilities, from the development of its Ethical Trade and Environmental Sustainability Programme, through to the launch of its Primark Cares commitments in 2021.

The second year of our Primark Cares strategy has been focused on embedding and scaling up pilot programmes and projects, and taking on our early learnings to understand where we can have impact and drive change. As we've turned up the dial this year, my focus has been leading the business through what is a significant transformation for Primark. Meeting our commitments requires us to change how we source and make our clothes, in addition to evolving how we work with our suppliers. Primark Cares has also

given us a new set of strategic considerations and priorities for our leaders within the business, which are intertwined with our continued growth and expansion ambitions. Underpinning all this is our continued commitment to drive value for our customers while maintaining our price leadership to ensure they don't pay any more as we adapt.

We continue to aim to bring customers with us on our change journey, being transparent about where, and how, our products are made. Our partnerships and collaborations are what make us different as a brand and we challenged ourselves this year to ensure Primark Cares sits central to those key partnerships. Primark x Rita Ora, which launched this September, is our biggest ever collaboration and I'm proud that two thirds of the ladies clothing in the range contains recycled or more sustainable materials. Rita also spent time getting to understand more about our supply chain and visited Primark's Sustainable Cotton Programme in India to meet with the female farmers.

I am very conscious of the scale of the Primark business and the difference we can make by adapting. However, I am also acutely aware that true systemic change requires collaboration. Looking externally, the fashion industry continues to adapt and evolve. It's not just customers to whom environmental and social concerns are becoming increasingly front of mind; stakeholders, investors and legislators are all looking at our industry as well. For Primark, this year, we've been reflecting on our role within this. We're continuing to push ourselves to collaborate more and build upon our existing partnerships. Our relationships with our suppliers remains at the heart of this and will be key to our commitments, and driving wider change. I visited Bangladesh twice this year to meet with key suppliers and industry bodies. They told me that recent years have been challenging for them, with COVID-19 and global supply chain issues. Despite these, they also recognise the need for change and are committed to adapt to support our commitments.

While in Bangladesh earlier this year, I visited [Phulki](#), our local NGO partner supporting the [Amader Kotha](#) grievance mechanism hotline where I was able to see, first hand, the valuable work of the helpline operators to support workers in our supply chain. This is just one programme that I had the chance to experience but we now support 34 social impact programmes in our sourcing markets. One of the key areas of progress this year has been developing our social impact measurement framework, which will enable us to better understand and determine the impact of these programmes in our supply chain.

Given the amount of change that the business has faced this year, our people have been at the front of my mind. Primark is perhaps best known for its products, but as a business we're powered by our people. Through times of change, listening and learning from our colleagues has never been more important and we must continue to put this, and them, first. Our bi-annual colleague survey, Your Voice, has been central in enabling this, alongside the roll-out of initiatives such as our wellbeing programme Spark, and our Diversity and Inclusion colleague networks, both of which are actively shaping our culture and driving greater inclusion. Change is challenging, but I remain encouraged by our ongoing progress and am proud of our colleagues, partners and suppliers who share our vision and are changing with us for the future and for the better.

PAUL MARCHANT
Chief Executive

A MESSAGE FROM LYNNE WALKER, DIRECTOR OF PRIMARK CARES



Lynne is responsible for leading the delivery of Primark Cares, Primark's sustainability strategy, across the business and more widely through our supply chain.

It's been two years since we launched our Primark Cares commitments and I am encouraged and inspired by the momentum behind the strategy, both across the business and among our partners. While there have been plenty of lessons learnt this year, we continue to remain focused on ensuring sustainability and ethics are central to our business approach and strategy. There is no doubt that we have a responsibility to learn how to integrate sustainability as a core part of our business, not on the periphery.

My background is in buying, so I am particularly heartened to see our Primark Cares product pillar commitments being embedded across all categories within our business.

Whether it's through our collaboration with Rita Ora, our expanding license ranges, The Edit collection, or our everyday value essential ranges, I am proud that customers now have a much broader choice under our Primark Cares label. However, it's not just about changing how we design and make our clothes. We continue to push forward to develop and implement new ways to display and package our products too, for example how they show up in store and how they continue to surprise and delight our customers.

An important element of this is how we bring our customers along with us on our change journey and how we are transparent around where and how our clothes are made. We firmly believe we must continue to inform our customers about the changes we are making and what it means for them, helping them understand the issues and what role the fashion industry can play in this change. When it comes to transparency, this report is central to our approach, giving us a moment to reflect, pause and celebrate success (and any challenges). If we want to drive meaningful change, we must inspire collective action, and that starts with sharing the progress we are making – and most importantly the lessons we are learning – along the way. There has been lots of discussion about 'greenhushing' this year. We believe there is a risk that this may hinder industry progress. Of course, the flipside is that progress will also be hindered if companies and brands aren't honest about the challenges they face, or if they overstate the progress made, without emphasising the work still to be done. We recognise our responsibility in this sense and always strive to put honesty at the heart of our communications.

Transformation continues to be central to our Primark Cares strategy. Whether through material innovation and/or changing production methods, innovation is helping to create new possibilities for us as a business and for the wider industry. Our hope is that it continues to evolve at pace to help us keep moving forward.

Our repair programme remains a project very close to my heart, and it's a great example of one small, innovative idea that has built into a movement within communities and our stores. This idea came from a Primark customer and has now grown to a programme offering over 1,600 free places to customers and colleagues across four markets. We know it's only a small step in our wider ambition to become a more circular business, but we believe giving our customers life-long skills that encourage them to take care of and love their clothes for longer will help shift mindsets in high-street fashion.

We've really started to see wider industry collaboration gather pace this year. I see real opportunity for suppliers, brands and partners to learn from each other's experiences and share ideas for change. Our continued collaboration with our key partners such as the Ellen MacArthur Foundation and WRAP has been fundamental to our work in circularity and durability, core areas of our progress this year. But we've also brought new partners into the fold such as the British Asian Trust and WorkEqual and continue to work with existing partners such as Biodiversify. We look forward to further collaboration with our partners in the future and are grateful for the wide breadth of expertise these partnerships give to us as a business.

Overall, this year we've seen a step change in the environment within which we operate, as well as from customers, governments and regulatory bodies who are raising the bar on sustainable and ethical fashion requirements. We welcome this as it will help drive widespread change and will make it easier for customers to make better choices when shopping. Our challenge will be to continue to accelerate our Primark Cares commitments to meet the pace of change required, across our business and with our suppliers. However, we're excited and remain committed to driving change.

LYNNE WALKER
Director of Primark Cares

SUSTAINABILITY AND ETHICS GOVERNANCE



We have a comprehensive governance system to oversee sustainability and ethics at Primark, including the delivery of our commitments related to Primark Cares. Our CEO and Primark's Executive Committee are responsible for and central to all decision-making and implementation. In addition, relevant topics are fed into the wider business governance strategy as and when needed. For example, retail operational decisions are taken at the Operational Forum. This year we discussed the expansion of our Textile Takeback scheme into the Netherlands⁶ in this forum.

Our parent company ABF adds a layer of general oversight. Relevant topics related to ethics and sustainability, which are material at the ABF level, are discussed with the ABF Group CEO and Board both annually and when appropriate.

6. The expansion of the textile take back scheme into the Netherlands was rolled out in Sept 23.

PRIMARK CARES EXECUTIVE STEERING COMMITTEE

Frequency: Quarterly

This Committee reviews progress of Primark Cares commitments, in addition to risks and opportunities related to the strategy delivery. This helps ensure Primark Cares is embedded in wider key business strategies, initiatives and functions.

It is chaired by the Director of Primark Cares and members include the Primark CEO, the Primark Leadership Team, the Director of Legal Services and Company Secretary at ABF and other Director-level stakeholders.

PRIMARK CARES STEERING GROUP

Frequency: Every eight weeks

This forum supports the Primark Cares Executive Steering Committee, signing off project milestones and providing strategic direction to the Working Group. It also acts as an escalation point for delivery risks and issues. It is chaired by the Director of Primark Cares and members include cross-functional leaders (Director-level and Head of Level) from the teams involved in delivering Primark Cares.

PRIMARK CARES WORKING GROUP

Frequency: Every four weeks

This group is responsible for the day-to-day delivery of the Primark Cares commitments as well as supporting key functions to implement changes and new approaches. Sub-working groups are created for pillar teams as required.

POLICY AND COMPLIANCE FORUM

Frequency: Every six weeks

This forum discusses emerging policy, assurance requirements, their impacts and implementation. It also supports discussion on product compliance, including Primark Cares products, to enable efficient decisions. It is chaired by the Director of Product Sustainability and Quality and members include subject matter experts from across the business. Any outputs from this forum are cascaded across relevant teams in the business.

AD HOC STEERING COMMITTEE (FOR SPECIFIC TOPICS AND ISSUES)

Frequency: As required

Matters related to human rights due diligence in our supply chain that require ongoing, cross-functional discussions are raised through our Steering Committee governance structure. These are set up as and when required. The Committee gives guidance and proposes appropriate actions, that are subsequently reviewed by the Primark CEO and Primark Executive Team. Solutions are also discussed with the ABF Group CEO and Board when necessary. For example, this year Primark held regular Myanmar Steering Committee meetings to discuss our responsible exit from the country.

OUR PRIMARK CARES COMMITMENTS

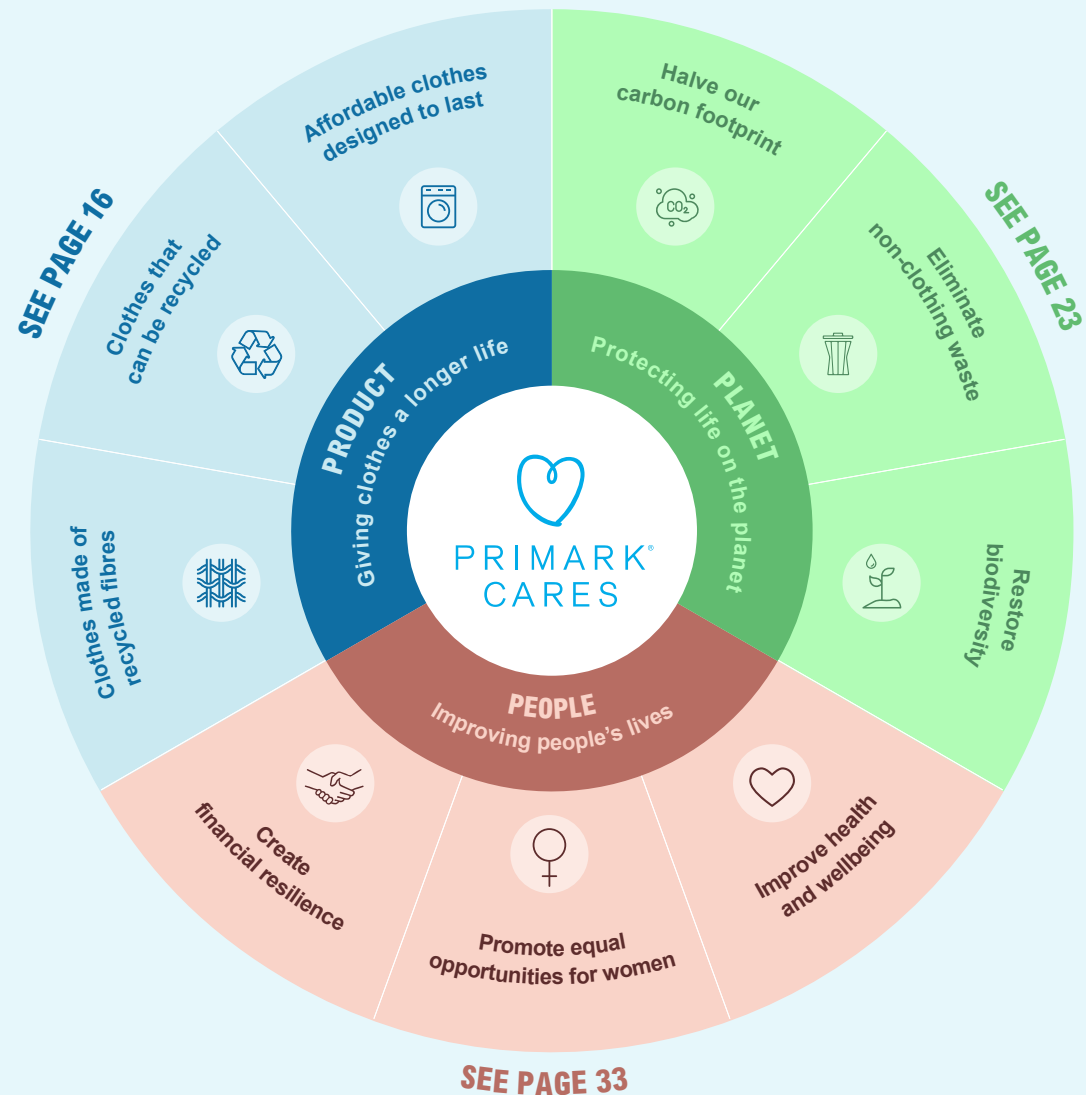
Primark Cares is our commitment to doing better as a business. This means making more sustainable clothes everyone can afford, reducing our impact on the planet, and supporting the livelihoods of the people who make our clothes.

Our Primark Cares strategy builds on the work of our Ethical Trade and Environmental Sustainability (ETES) team, started over 15 years ago. Launched in 2021, under Primark Cares, we've set out a number of public commitments which will accelerate our ambitions in this space. This means changing how we design and make our clothes, to the materials we use, how we work with our suppliers, and how our products are packaged and shipped.

With a focus on three areas, Product, Planet and People, Primark Cares commitments stretch until 2030 and are underpinned by four key elements:

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

We're closely tracking the changing legislative environment in which we operate. We recognise these changes may shift how we and our suppliers make and source products. New legislation will also require greater transparency within the fashion industry. We welcome these changes as they will require the entire industry to adapt and evolve and should lead to a level playing field. This will drive greater change, but will also ensure consistency in standards which will be helpful to consumers who are trying to make better and more informed choices. We remain committed to the delivery of Primark Cares under this changing landscape.



OUR PRIMARK CARES COMMITMENTS

OUR COMMITMENT TO PEOPLE WORKING IN OUR SUPPLY CHAIN

Primark’s [Supply Chain Human Rights Policy](#) outlines our commitment to human rights due diligence (HRDD) in our supply chain, the foundation of which is underpinned by the [United Nations Guiding Principles on Business and Human Rights](#) (UNGPs). Central to our approach to HRDD is our [Supplier Code of Conduct](#), which underpins our ETES programme and is based on international standards drawn from the International Labour Organization (ILO) core conventions and the Organisation for Economic Co-operation and Development (OECD) guidelines. It covers areas of workers’ rights such as payment of wages, health and safety, freedom of association, in addition to discrimination and forced labour.

Primark’s ETES team has over 130 people based in our 12 key sourcing markets who are responsible for managing various aspects of HRDD through our supply chain. We take a risk-based, worker-centric approach to HRDD that makes use of multiple channels of information to set our priorities. This includes desk-based research, social audits, direct engagement with workers and their representatives, as well as engagement in local and international forums. We greatly value our engagement with a global network of local and international stakeholders (unions, governments and civil society organisations) whose support and feedback are essential to our progress.

130 people
based in 12 of our key sourcing markets acting as our ‘eyes and ears’ on the ground

We conducted **2,360 audits** during 2022

OUR SOCIAL AUDIT MONITORING PROGRAMME

Like most other clothing brands, we don’t own the factories where our products are made. Our social audit monitoring programme is central to the implementation of HRDD in our suppliers’ factories and any tier 1 factory⁷ is approved to make products for Primark is subject to an audit at least once a year. These audits are managed by our local ETES teams who are trained in social auditing and are experts in understanding local regulations, in addition to themes and issues impacting workers. They are our ‘eyes and ears’ on the ground, helping to identify risk, while also working closely with suppliers and factory management, in addition to third party experts, to drive improvements in the workplace environments for factory workers.

Our ETES team also helps us understand trends that are developing across regions. Their insights, as well as the results of the audit programme, guide us in planning future work to support our supplier factories. We carry the full cost of these audits which includes rigorous checks for health and safety management, in addition to human rights and labour rights issues. These audits are based on a full on-site review of health and safety.

Any new factories proposed by our buyers to make products for Primark must go through a rigorous onboarding process, including a social audit from our ETES team. No orders are placed in a supplier factory until they are approved to make Primark products. Once onboarded, every Primark-approved tier 1 factory is audited at least once a year. This is across every country from where we source. We conducted 2,360 audits during 2022, most of which were unannounced. Primark carries the full cost of these audits.



7. Tier 1 factories are factories manufacturing finished goods in our supply chain.

OUR PRIMARK CARES COMMITMENTS

Our social audit monitoring programme checks that suppliers and their factories meet the requirements in our [Supplier Code of Conduct](#). Following the audit, supplier factories are issued with a corrective action plan (CAP) that outlines any areas for improvement. In cases where we have identified high or salient risk to workers, we implement additional due diligence activities beyond our social audit monitoring programme. The Primark Structural Integrity Programme is an example of this additional due diligence. We established the programme in 2013 in Bangladesh to help assess the safety of the buildings of our supplier factories against international standards. More details on this programme can be found [here](#).

In other situations, where our team identifies more systemic issues, our Social Impact team works to put in place longer-term solutions and projects to help address these issues. Many of these programmes are discussed in the [People](#) section of this report. The social audit programme is currently being expanded to cover more of Primark’s suppliers such as service providers and logistics.

More detail about our approach to HRDD can be found in our [Modern Slavery Statement](#).

COLLABORATING WITH SUPPLIERS

Our global product supply chain is large and diverse, spanning 22 countries. As is typical with large clothing retailers, we don’t manufacture our products, but work in partnership with our suppliers that contract or work with factories who make our products.

Our global supply chain is large and diverse, spanning 22 countries

Our longest-standing supplier has worked with us for over 24 years

The relationships we have with our suppliers are central to our business. Our longest-standing supplier has worked with us for over 24 years, with the majority supplying Primark for over seven years. Supplier engagement sits across several departments within Primark including our Buying, Merchandising, Quality, Sourcing, Product Sustainability and ETES teams. All our teams meet regularly with our suppliers, including in-country market visits. Strategic supplier relationships are led by our Sourcing team who engage regularly with suppliers to collaborate and help manage local issues, should they arise.

More broadly, our long-term ambition is to build stronger strategic supplier relationships to help drive progress in our Primark Cares commitments. We are also developing key performance indicators (KPIs) that will reward suppliers for their efforts towards Primark Cares.

SUPPLIER AND FACTORY EXITS

We work hard to maintain our existing supplier relationships. However, should we need to stop working with a factory or supplier, exits are managed by our Sourcing and ETES teams in line with the expectations of responsible business conduct laid out by the OECD and as set out in our [Supply Chain Human Rights Policy](#), in addition through our active membership of [Action, Collaboration and Transformation \(ACT\)](#).

WORKER ENGAGEMENT AND GRIEVANCE MECHANISMS

Direct engagement with workers is fundamental to supporting our commitment to decent and safe workplaces for workers in our supply chain. Our local teams speak directly with workers during audits and through our social impact programmes in factories. This enables us to better understand their needs and priorities and how they experience their workplace, which also helps us drive improvements in our programmes.

Primark takes a layered approach to making effective and accessible grievance mechanisms available to all of our colleagues and people in our supply chain. More information on our approach to grievance mechanisms can be found in the [People](#) section of this report [here](#) and in our [Modern Slavery Statement](#).



OUR PRIMARK CARES COMMITMENTS

TRANSPARENCY IN OUR SUPPLY CHAIN

We're focused on improving transparency across our end-to-end product supply chain. For the past six years, we've published our [Global Sourcing Map](#), which includes all tier 1 factories that make our products, in addition to the number and gender of workers at each site.

The size and complexity of our product supply chain makes traceability a challenge but it's something we continue to focus on. This year, we established a Transparency and Traceability team, now seven strong, within the Sourcing team to help implement a new traceability programme, initially piloting with 11 key suppliers. Over the last two years, we've been building a partnership with a market-leading platform for supply chain traceability and compliance, [TrusTrace](#). This traceability platform allows us to gather data from the full supply chain of a product, from its raw materials all the way through to finished product. We'll use the information to better understand and manage our supply chain.

Starting with cotton, as it's our most frequently used fibre, we rolled out a pilot to map our supply chain with some key suppliers based in China, Pakistan, Bangladesh and India. This year we expanded the programme to include more suppliers, fibres and products. We've taken lots of learnings from the initial phases of the roll-out, such as how to effectively engage suppliers, understanding suppliers challenges and how we can improve the training we deliver. We are also continuing to work with suppliers to validate the data and help embed this process further.

To drive accuracy of this data, we need the full engagement and support of our suppliers. Last year, we ran training for all tier 1 suppliers on how legislation and supply chain due diligence are driving traceability requirements, and the challenges we'll need to work through together to ensure compliance.

“We've been using TrusTrace for nearly a year now. It's had positive impact on our business by enhancing visibility and quality control, improving risk mitigation and decision-making, in addition to supporting more responsible business practices. Collecting accurate and comprehensive data throughout the supply chain can be challenging. It requires collaboration and coordination among multiple stakeholders, including suppliers, manufacturers, ginners and farms. Ensuring data consistency, reliability, and standardisation across different systems and formats can be a complex task. However, this technology enables us to identify and visualise each step in the process, enabling us to see where our inputs are coming from, how they move through the supply chain and where potential bottlenecks may exist.

**PRIMARK SUPPLIER
USING TRUSTRACE**

TRACEABILITY OF THE COTTON FROM OUR PRIMARK SUSTAINABLE COTTON PROGRAMME (PSCP)

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



BUILDING GLOBAL PARTNERSHIPS



OUR APPROACH

We often work with trusted partners to help us deliver greater impact within our business, supply chain or local communities. These include partners from a range of organisations – including membership groups, charity organisations, local and international NGOs, and unilateral and multi-stakeholder initiatives.

We're signatories to major industry initiatives who provide guidance and support as we embed more sustainable sourcing and manufacturing practices in our business. More information on our partners can be found [here](#) and in our [Modern Slavery Statement](#).

We're committed to following the guidance outlined in the UNGPs, as well as the [OECD Due Diligence Guidance for Responsible Business Conduct](#). Engaging and partnering with relevant stakeholders helps us to increase our leverage and build further understanding of the risks in our business and supply chain, in addition to how to address them. This includes engaging with policymakers, worker rights organisations and civil society groups. We also actively participate in multi-stakeholder and industry initiatives at both a national and international level.

Engagement with policymakers is increasingly important with increased ESG regulation, in addition to changes to local legislation in our sourcing markets. We welcome regulation that seeks to benefit workers, the environment or society, and which will help to level the playing field.



As a high street retailer, our local communities are the lifeblood of our business. We aim to make a positive difference in the areas where we live and work as part of our responsibility to give back to our colleagues and customers.

Over the past year we have strengthened our partnerships with charities such as [Irish Cancer Society](#), [Breast Cancer Now](#), The International Lesbian, Gay, Bisexual, Trans and Intersex Association ([ILGA World](#)) and [UNICEF](#) as well as placing renewed focus on community impact and engagement. We also look forward to embedding new partnerships, such as that with [WorkEqual](#), who help remove barriers to career progression for women in Ireland.



CELEBRATING 10 YEARS OF THE PRIMARK SUSTAINABLE COTTON PROGRAMME

FROM PILOT TO SCALE: A DECADE ON

We launched our PSCP as a pilot with 1,251 farmers in India in 2013. Working in collaboration with agronomic experts [CottonConnect](#) and the Self Employed Women's Association (SEWA), our objective was to understand and reduce the environmental impact of our cotton, support the livelihoods of cotton farmers and explore how we could change the way we sourced cotton.

We have since expanded our PSCP to other countries and work with local partners [Myrada](#) in India, in addition to SEWA; the Rural Education & Economic Development Society (REEDS) in Pakistan; and Thengamara Mohila Sabuj Sangha (TMSS) in Bangladesh. This year, we have taken our PSCP to Turkey, where we're running a pilot.

10 years on, our PSCP has evolved into the largest of its kind for a single fashion retailer. This year marks the beginning of a new decade in which the programme will continue to support the livelihoods of farmers in the context of a changing climate. As of the end of July 2023, 299,388⁸ farmers have received training in the Primark Sustainable Cotton Programme; surpassing our target of 275,000 farmers by the end of 2023.

The programme is helping to support our commitment that 100% of the cotton in our clothes will be organic, recycled or sourced from our PSCP by 2027.

ABOUT THE PROGRAMME

Cotton farmers are trained to reduce their use of water and chemical fertilisers and pesticides, in addition to learning new skills relating to seed selection, land preparation, sowing, crop management and harvesting. The training is aligned to [CottonConnect's REEL Code](#). The farmers use their new skills to reduce the costs of growing cotton, boost their cotton output (yield) and therefore their profits.

PROMOTING RESILIENCE AMONG WOMEN FARMERS AND THEIR COMMUNITIES

Around 90% of the farmers in our PSCP are smallholders⁸ and 80% of the farmers in the programme are women. Building resilience among farming communities is at the centre of our PSCP. **Since 2019, almost 12,000 women in Pakistan and Bangladesh have received training to support improvement in their financial literacy, and access to healthcare, including family planning and menstrual hygiene.** Participants are also educated about women's rights.

REFLECTIONS AND LEARNING FROM THE LAST 10 YEARS

Earlier this year, Primark and SEWA met with over 70 farmers involved in the programme from the beginning. We heard how, since participating in our PSCP, they continue to actively share learnings and skills on more sustainable cotton farming methods 10 years on. They have also re-invested their improved cotton incomes into their farms and homes, and in the education of their children.

They said our PSCP training increased their confidence, and they felt more respected. They highlighted how, as members of SEWA, they have been able to rely on continued support and advice as they have needed it, far beyond the completion of the training through our PSCP.

As of the end of July 2023,
299,388⁹
farmers have received training
in our PSCP

90%
are smallholders⁸ and
80%
are women



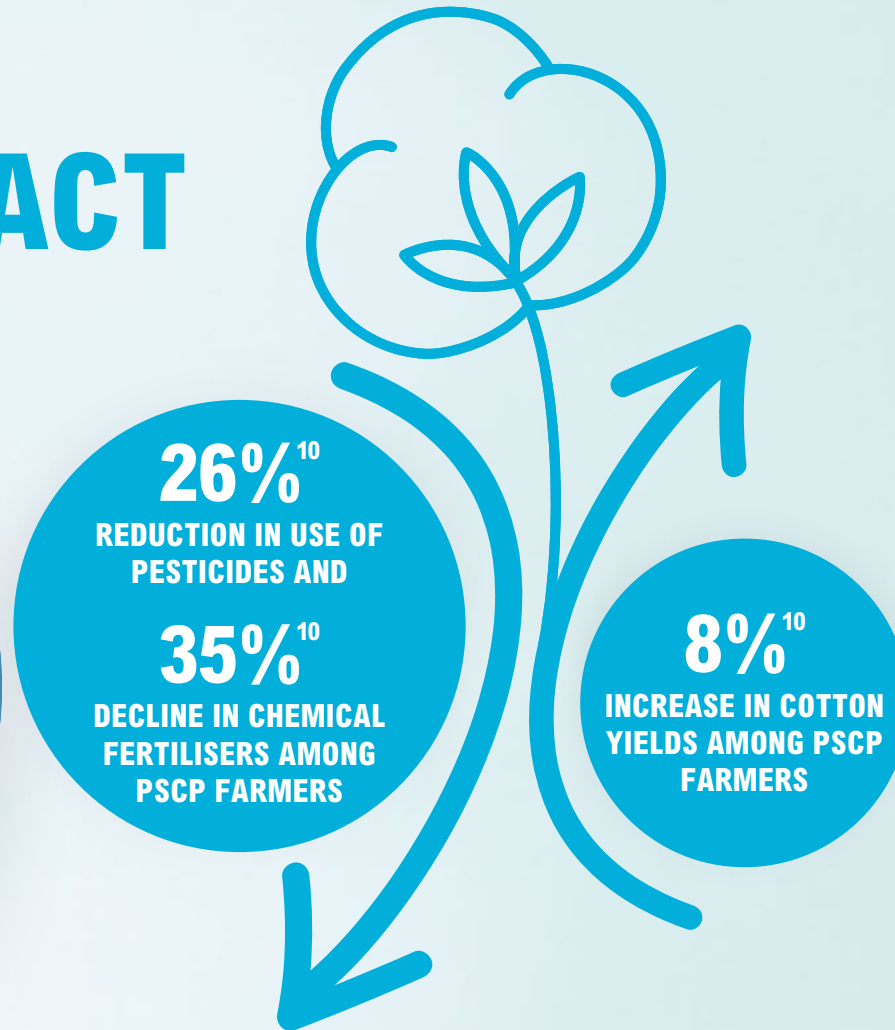
“I HAVE GROWN ONE ACRE OF COTTON. I HAVE ALSO PRACTISED INTER-CROPPING, CULTIVATING CROPS LIKE MOONG, GUAR, AND VARIOUS VEGETABLES INCLUDING TOMATOES.”

ZALA MINABA, PSCP FARMER, GUJRAT, INDIA

8. Based on a definition from ISEAL, a smallholder farm in the developing world is typically a family-owned enterprise that produces crops or livestock on two or less hectares.
9. Farmers trained includes farmers that are already being trained and those that have completed training under the programme.

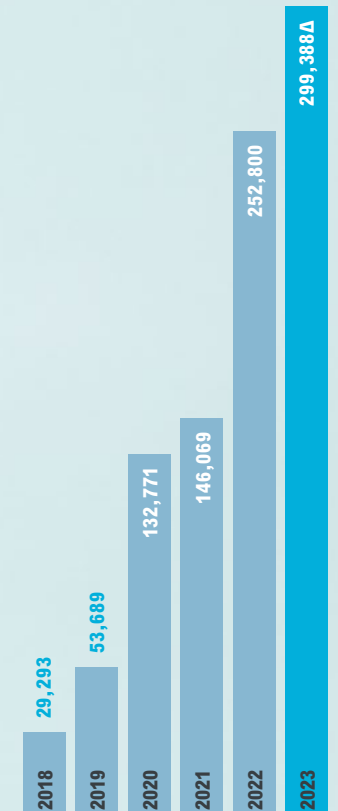
CELEBRATING 10 YEARS OF THE PRIMARK SUSTAINABLE COTTON PROGRAMME

10 YEARS OF IMPACT



46%^Δ OF OUR COTTON CLOTHING UNITS SOLD CONTAIN COTTON THAT IS ORGANIC, RECYCLED OR SOURCED FROM OUR PSCP, UP FROM 40% LAST YEAR.

GROWTH IN THE NUMBER OF FARMERS



10. In comparison to a control group of farmers located across PSCP regions but not belonging to the programme, measured from 2019-2022.

CELEBRATING 10 YEARS OF THE PRIMARK SUSTAINABLE COTTON PROGRAMME



“THERE HAVE BEEN CHANGES WITHIN ME AS WELL. I NOW HOLD A POSITION OF RESPECT BOTH AT HOME AND IN SOCIETY, BECAUSE WE TRAIN THE WOMEN IN A WAY THAT BRINGS CHANGES TO THEIR LIVES.”

LALITA MAKWANA, PSCP TRAINER, GUJARAT, INDIA

SUPPORTING FARMERS IN THE FACE OF CLIMATE CHANGE

All PSCP farmers in Pakistan were affected to varying degrees by the floods in June 2022 which caused widespread and devastating damage to crops, livestock, houses and community infrastructure. We worked closely with CottonConnect and REEDS to assess the damage in Pakistan, to establish what support was needed for the farmers and their communities, and to set up the Primark Flood Relief Project. As part of this project 20 mobile medical and veterinary camps were set up, providing medical support to 2,000 people and 3,000 livestock. 250 families also received goats and hens and 130 hand pumps and 130 community toilets damaged in the floods were also repaired and rebuilt. This is the stark reality of the evolving work needed to support some PSCP farmers in the face of climate change.

One of the PSCP farmers, Kubra Mai, lost her crop, and her home was damaged by the flood. She had no access to clean water, which left her family dealing with fever and severe skin conditions. Kubra received medical support funded by our PSCP.

Kubra and her children have recovered and, using the knowledge gained from the programme, she has successfully cultivated cotton on her one-acre farm this year following the effects of the flood.

“THE DOCTOR CHECKED ME AND MY CHILD AND GAVE US MEDICINE. THIS MEDICAL CAMP WAS VERY HELPFUL FOR ME DURING THIS VERY DIFFICULT TIME. WE HAD NO COURAGE OR MONEY FOR OUR TREATMENT AFTER THE RAIN.”

KUBRA, PSCP FARMER, PAKISTAN

CELEBRATING 10 YEARS OF THE PRIMARK SUSTAINABLE COTTON PROGRAMME



“WE’VE LEARNED A LOT FROM THIS PROGRAMME AND THE WOMEN HAVE GAINED A LOT OF BENEFITS. IT’S NOT JUST ABOUT RECEIVING EDUCATION AND LEAVING – IT’S CONTINUOUS EDUCATION FOR THREE YEARS.”

HEENA DAVE, PSCP TRAINER AND SENIOR COORDINATOR, SEWA, GUJARAT, INDIA

MOVING TOWARDS A MORE REGENERATIVE APPROACH TO FARMING

As we look to the future, we’re working to train PSCP farmers in more regenerative farming practices. Our aim is to promote farming methods that go further to support biodiversity and strengthen local ecosystems to the benefit of both the farmers and their environment. Regenerative farming practices aim to work in sync with nature. They restore soil health as well as protecting biodiversity and water resources needed to grow crops.

As we look to introduce more regenerative farming practices within our PSCP, farmers will follow [CottonConnect’s REEL Regenerative Code](#) which includes techniques to help farmers mitigate and adapt to the impacts of climate change and conserve agro-biodiversity. One of our targets is for farmers in our PSCP to use more regenerative agricultural practices by 2030.

As progress towards our commitment, approximately 3,000 PSCP farmers are participating in a three year pilot on regenerative farming practices in India, Bangladesh and Pakistan. These farmers are now in their third and final year where they’ve been receiving specific training on how to help improve biodiversity and soil health. Our aim was to use the learnings from this pilot to tailor our approach to farmer training and support across the programme. For example, we’ve learnt about the importance of localised approaches to trainings and knowledge building. Training farmers on practices like biopesticide production and non-chemical fertilisers which require easily accessible local resources also helps to engage farmers.

We’re also working with CottonConnect to develop the methodology for assessing farmers’ adoption of the more regenerative agriculture practices so that we can start reporting against our public commitment in this area.

This year, we provided an additional year of training as part of our PSCP, which ensures that farmers who had already completed training benefit from the recently added regenerative elements of the revised training programme. Over 130,000 farmers completed this additional training year in 2023.

THE EVOLUTION OF OUR PSCP

Impact results from our PSCP, in addition to our conversations with farmers, enable us to measure and understand the positive impact of the programme. However, challenges remain. Female farmers still struggle for equality across many aspects of their working lives. This is compounded by the real impacts of climate change. We must continue to adapt and grow our PSCP to focus support where it is needed most. We hope to be able to use our learning and experience to drive industry change and amplify the voice of smallholder farmers in the global transition to more sustainable and more regenerative farming practices.

In the past year we have signed partnerships with two expert organisations to help us on this journey. [Harper Adams University](#) will advise us on how to develop the regenerative programme so that we can help farmers pivot to more regenerative agriculture. The second is with [International Institute for Environment and Development \(IIED\)](#), who are helping us understand insurance and how PSCP farmers in India access it. We know that insurance plays a role in building resilience to climate change and other shocks that are increasingly part of farmers’ daily lives.

Approximately
3,000 farmers
are now in the 3rd and final year of a pilot on more regenerative farming practices

We provided
130,000 farmers
with one more year of training on regenerative farming practices

LEARN

WE LAUNCHED OUR CIRCULAR PRODUCT STANDARD AND A NEW COLLECTION BASED ON THIS FRAMEWORK, WITH OVER 3 MILLION UNITS OF CIRCULAR CLOTHING SOLD THROUGH THIS COLLECTION



SCALE

WE'VE EXPANDED OUR REPAIR WORKSHOPS ACROSS OUR STORES, HAVING OFFERED OVER 1,600 FREE PLACES TO CUSTOMERS AND COLLEAGUES SINCE 2021

EMBED

55%Δ OF OUR CLOTHING UNITS SOLD CONTAINED RECYCLED OR MORE SUSTAINABLY SOURCED MATERIALS, UP FROM 45% LAST YEAR

PRODUCT



GIVING CLOTHES A LONGER LIFE

We often get asked how we're changing the way we make and source our clothes. Primark Cares includes three commitments that address different stages of the product life cycle to help us become a more sustainable and circular business. This includes improving the durability of our clothes and making clothes that our customers can recycle at their end of life.

OUR THREE PRODUCT COMMITMENTS



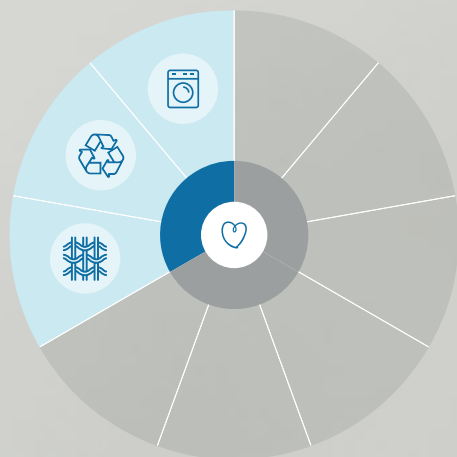
Clothes made from recycled fibres – all our clothes will be made from recycled or more sustainably sourced materials by 2030.



Affordable clothes designed to last – we will strengthen the durability of our clothes by 2025.



Clothes that can be recycled – our clothes will be recyclable by design by 2027.



CLOTHES MADE FROM RECYCLED OR MORE SUSTAINABLE FIBRES

OUR APPROACH

Our Primark Cares label was created in 2018. It aims to give customers the confidence that the clothes and products within the label meet our strict approved materials and protocols, including minimum content levels of more sustainable or recycled materials. We continue to challenge ourselves to raise the bar for what meets our Primark Cares label criteria. We've committed that all our clothes will be made from recycled or more sustainably sourced materials by 2030. Currently, 55% Δ of our clothing units sold contained recycled or more sustainably sourced materials, up from 45% in 2022.

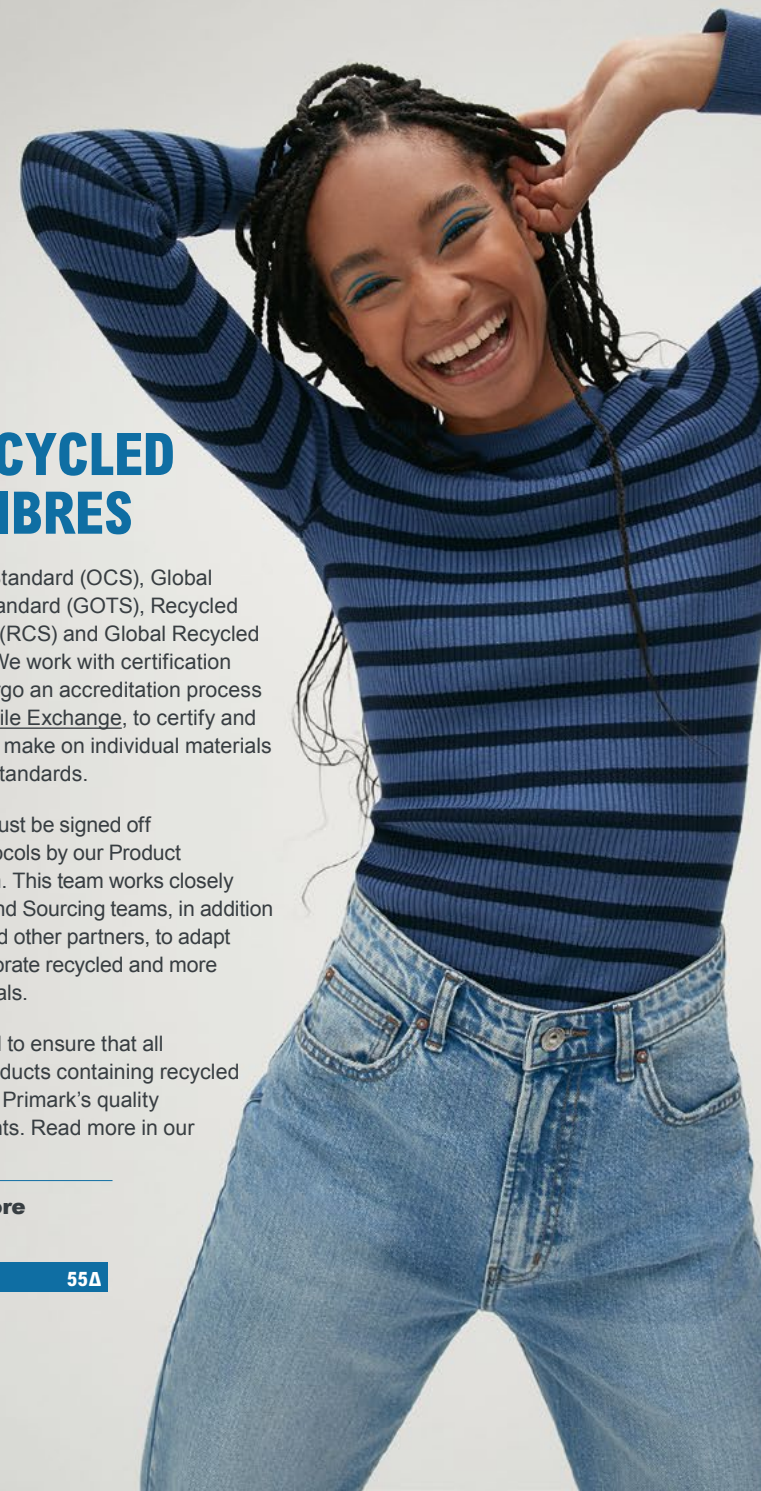
Currently, there is no industry minimum content standard that covers all material types, which is one of the challenges in this space. Our minimum content protocols vary by material type and have been set to ensure alignment with industry recognised standards such as:

Organic Content Standard (OCS), Global Organic Textile Standard (GOTS), Recycled Content Standard (RCS) and Global Recycled Standard (GRS). We work with certification bodies, who undergo an accreditation process authorised by [Textile Exchange](#), to certify and validate claims we make on individual materials relevant to these standards.

These materials must be signed off against these protocols by our Product Sustainability team. This team works closely with our Product and Sourcing teams, in addition to our suppliers and other partners, to adapt products to incorporate recycled and more sustainable materials.

We also work hard to ensure that all Primark Cares products containing recycled fibre content meet Primark's quality testing requirements. Read more in our [glossary here](#).

Percentage of clothing units sold containing recycled or more sustainably sourced materials



CLOTHES MADE FROM RECYCLED OR MORE SUSTAINABLE FIBRES

SCALING UP OUR USE OF RECYCLED OR MORE SUSTAINABLE FIBRES

RECYCLED COTTON

While we continue to push ourselves to scale across all the fibres falling under Primark Cares, our partnership with [Recover™](#) is helping us expand our use of mechanically recycled cotton and also harness the latest innovations. Recover™ is a leading materials science company and global producer of low-impact, high-quality recycled cotton fibre and cotton fibre blends. The company transforms textile waste into recycled fibres and blends that can be used again to create new clothes. Our partnership began in 2020 and continues to grow. What started out as a pilot project has now scaled up significantly in just three years.

As we work towards using more sustainably sourced materials and recycled fibres in our clothes, we continue to explore the impact on fibre, yarn, fabric and product quality. For example, using mechanically recycled cotton is relatively new and affects a number of processes, from yarn spinning to producing the garments. This year our material managers have worked closely with spinners, fibre producers and suppliers to evolve our use of recycled cotton and to overcome technical challenges.

MAN-MADE CELLULOSIC FIBRES

We rely on wood pulp for a range of fibres like viscose and lyocell, known as man-made cellulosic fibres (MMCF). In 2022, we published our [Wood and Wood-Derived Fibre Policy](#), which sets out our approach to responsibly sourcing these materials. We've been a signatory of not-for-profit environmental organisation [Canopy](#) since 2022. We continue to work alongside other fashion brands through the CanopyStyle initiative, which aims to transform fashion supply chains away from using ancient and endangered forest material and bring lower-impact fabric alternatives to customers.

EDUCATING ON RECYCLED OR MORE SUSTAINABLE FIBRES

In 2023, we trained 286 of our suppliers on the Primark Cares protocols and standards, helping to support them as they move towards recycled or more sustainable fibres to ensure product claims are accurate. We've also developed digital training modules to educate our Product teams on how to integrate more of these materials into our products.

EDUCATING CUSTOMERS ABOUT OUR FIBRE CLAIMS

We firmly believe that it's not enough to change the way we make and source our clothes. We must also inform our customers about the changes we are making and what it means for them. Sustainability and environmental claims are complex, and we know they can be confusing for customers, so we're taking further steps to ensure our customers can make more informed choices about the products they buy.

We've launched an expanded online [glossary](#) which explains the key terms we use within our commitments and shares information around the minimum percentage content of recycled and more sustainable fibres within our Primark Cares products. These minimum content standards are brought to life on the Primark Cares products we sell, with our swing tags setting out the minimum percentage of fibres within the product.

We also use QR codes in store to help guide and educate customers further. Our new website – which has now launched in all the markets where we have our stores – allows customers to read about all the work we do in Primark Cares and browse our product range, including the products under our Primark Cares label. We're committed to continually improving how and what we communicate about our products to our customers.

55%Δ

of our clothing units sold contained recycled or more sustainably sourced materials

We've educated 286

suppliers on the criteria needed for a product to meet our Primark Cares fibre requirements





MAKING AFFORDABLE CLOTHES THAT ARE DESIGNED TO LAST

More than half of everything we sell are everyday essentials like – hoodies, pyjamas, socks and plain tees – that are designed to be worn on repeat. Every single item we sell has an impact, so whether it's an item for special occasions or to wear around the house, we want all of them to last.

Durability refers to the length of time an item of clothing remains functional and wearable, without requiring much maintenance or repair after normal wear and washing. Designing and making clothes that are durable is central to becoming a more sustainable and circular business. That is why we've committed to further strengthen the durability of our clothes by 2025.

There is currently no recognised standard for durability across the fashion industry. We want to help change that, so consumers can be assured that what they buy will last, no matter what they can afford to spend. To tackle this, Primark is working with WRAP, as a signatory to its [Textiles 2030](#) initiative, which is bringing businesses together to align the thinking in the industry on durability.

TESTING DURABILITY ACROSS OUR PRODUCTS

Last year, as part of the Textiles 2030 collaboration, we developed a new internal enhanced durability wash framework, guided by the [WRAP Clothing Longevity Protocol](#). On our more established product category of denim, where we implemented our extended wash and performance testing 18 months ago, 57% of denim tested passed at 30 washes, the highest level under our enhanced wash framework. Since testing began in April 2023, 58% of socks tested passed the first level of our enhanced wash framework which equates to 31 washes for this category.

11. 1600 free places since the repair workshop programme launched in 2021.

12. Launched in October 2023.

As the framework is embedded into more product departments in 2023/24, we'll continue to gather testing data to learn which products need further development to reach our target durability levels. With these insights, we aim to learn from products that are already performing to new durability expectations. We also want to

understand what is technically possible. For example, new fibre compositions like those with recycled content may need to have specific criteria for durability due to what is technically possible. Following these pilots, we're committed to publishing further details of our enhanced durability framework in the next year.

This year, we've scaled up our extended durability wash testing to cover

39%
of all our clothing

57%
of denim tested passed at 30 washes

58%
of socks tested passed the first level of our enhanced wash framework

SCALING OUR REPAIR WORKSHOP PROGRAMME

We're committed to encouraging our customers to love and wear their clothes for longer. One of the ways we're doing that is through our free repair workshops which aim to inspire and empower people to mend and stitch. Following a successful series of repair workshops in 2022, we've now expanded the programme across a number of our markets. To date, we've run over 100 workshops in stores across the UK, Republic of Ireland, Netherlands and France and offered 1,600 free places to customers and colleagues¹¹. Following on from our successful workshops in Rotterdam, we're now launching repair workshops¹² in all Primark stores across the Netherlands over the next two years. We're also running a series of pilot workshops¹² in our Italian stores.

Three new tutors have now joined our original designer and lecturer, Lorraine Mitchell, in running the workshops. The hands-on sessions cover core basic repair skills, from sewing buttons to adding zips and mending techniques, which are practical and tangible actions to encourage customers to keep and wear their clothes for longer. Our tutors also give lessons in customisation.

In our Manchester store, we ran workshops in collaboration with The Fashion School, a community interest company aimed at empowering young people to love their clothes for longer through transforming and repurposing their clothes.

We've also created an online customer hub featuring easy-to-follow repair videos, covering everything from basic stitching to sewing on buttons and zips. The tutorials are available across our social channels too. You can access the hub [here](#).



Over 100
workshops in stores across the UK, Republic of Ireland, Netherlands and France

1,600
free places to customers and colleagues

**MAKING AFFORDABLE CLOTHES
DESIGNED TO LAST**

**UNDERSTANDING THE RELATIONSHIP BETWEEN
DURABILITY AND PRICE IN CLOTHING**

This year, we worked with environmental charity [Hubbub](#) and the School of Design at the University of Leeds on a [study into the relationship between price and durability](#). It assessed clothing performance against a series of industry recognised methods, such as abrasion, under controlled lab conditions. One of the largest studies of its kind, 65 items of clothing ranging in price from £2 to just under £150 were independently tested, including denim jeans, hoodies and t-shirts from a range of high-street brands in womenswear and menswear.

The study found that retail price can't be used to indicate which garments are going to last longer than others. For both high and low-priced items, durability ranged from excellent to very poor. Furthermore, the research highlighted the need for alignment within the industry on a recognised durability measure or standard to allow customers to make more informed choices when shopping.

We are now working with Hubbub to research consumer attitudes to clothing and examine consumer wearing and washing habits in practice to further understand the factors that impact clothing durability.

65 items
ranging in price from £2 to just under £150 were independently tested for durability. The study found that retail price can't be used to indicate which garments are going to last longer than others

REDUCING TEXTILE AND CLOTHING WASTE

Textile waste is generated in our supply chain, predominantly when fibres are produced and fabric is cut into pieces for making clothes, so we're working with suppliers to understand this issue better. We've adopted the Higg Facilities Environmental Module (FEM) and invited suppliers that make up over 70% of our turnover to complete the assessment. It's a standardised, industry-level framework to rank suppliers' environmental performance, giving a score for a number of areas, including waste management, water, carbon, chemical use and others. We're also running surveys on textile waste with a number of suppliers in key sourcing regions.

**REDUCING TEXTILE WASTE AT SOURCE
WITH THE CIRCULAR FASHION
PARTNERSHIP**

Waste and recycling infrastructure differs greatly around the world. This means our suppliers in sourcing markets may not have reliable options for recycling their textiles. The [Circular Fashion Partnership](#) (CFP), led by [Global Fashion Agenda](#), is a cross-sectoral initiative to support the development of effective circular fashion systems in textile, garment and footwear manufacturing regions, by capturing and recycling post-industrial fashion waste. In 2021, we joined the project to explore the Bangladesh textile waste system and in 2022 we extended our contribution to become a Supporting Partner of the initiative.

According to the [Global Fashion Agenda](#): as of the end of April 2023, the manufacturing partners involved in the project had registered an impressive 8,500 tonnes of waste on the Reverse Resources platform. Notably, approximately 40% of this waste has already been traced to esteemed high-end recycling companies.

As it is crucial to understand waste at a local level, the project has since expanded to Cambodia, with a forthcoming initiative planned in Vietnam.

“Unlike other countries, Cambodia lacks formal specific textile waste recyclers, making it difficult for factories and investors to participate in the circular industry. Understanding waste at a local level and collaborative efforts between government, industry stakeholders and international organisations are crucial in supporting the development of circular practices in the country. The Circular Fashion Partnership demonstrates the shared responsibility by facilitating circular commercial collaborations between manufacturers, recyclers and fashion brands to really drive change and support Cambodia in moving towards a more sustainable and circular fashion ecosystem.”



**PHOEBE NGUYEN,
ENVIRONMENTAL MANAGER
AT PRIMARK
FOR SOUTH-EAST ASIA,
BASED IN VIETNAM**

REDUCING TEXTILE AND CLOTHING WASTE

DONATING CLOTHING AND TEXTILES IN STORE

We want our clothes to be worn again and again. However, if our customers want to give their pre-loved clothes a new life, we offer a Textile Takeback scheme in our stores with the help of our recycling specialist Yellow Octopus. The scheme allows customers to donate any brand of pre-loved clothing, textiles, footwear and bags at stores across the UK, Republic of Ireland (ROI), Austria and Germany. We also expanded the scheme to all stores in the Netherlands in September 2023. As a result Textile Takeback now covers 65% of all Primark Stores internationally. Each donated item is sorted and graded by Yellow Octopus to be re-loved by someone else. If it can't be given a second life, the clothes or textiles will be recycled. In the UK, we've also partnered with Yellow Octopus to trial its 'Upcycle Labs'¹³ technology, which uses textile waste to create new shop fittings and home products such as soap dishes, vases and candle holders. Like the factories that make products for Primark, Yellow Octopus is audited in line with our Supplier Code of Conduct.

Through our Textile Takeback scheme to date, we've collected

347¹⁴ tonnes of textiles and footwear donations across all markets

69%¹⁴ of these donations

were resold for reuse, with the rest repurposed or downcycled

The funds raised through our Textile Takeback scheme support UNICEF in providing better access to education, health, water and hygiene, as well as life-saving aid to children in need.

We plan to extend our Textile Takeback scheme across other markets but will only do so when we can be confident our programme complies with local regulations and works for the infrastructure and customers in that country.

MANAGING UNSOLD STOCK

We have an efficient business model, so we minimise excess stock. Where we do have unsold stock, we work with partners to ensure it is donated, resold or recycled if it can no longer be worn. In the UK and ROI, we make regular donations of our unsold items and buying samples to Newlife, a charity supporting disabled and terminally ill children across the UK. In the US, we make regular donations of unsold clothing to our charity partner, Delivering Good.

In Europe, our in-store recycling partner Yellow Octopus manages any unsold stock, sorting it and sending it for reuse or to be recycled. Items in good condition are resold through resale partners authorised by Yellow Octopus.



13. These products are not sold in Primark.

14. Textile donation in all markets to date July 2023 (ROI, UK, Germany and Austria.): Estimated 346.82 tonnes. Textile donation (%) to date July 2023 (ROI, UK, Germany & Austria.): Estimated 69%.

GIVING CLOTHES A LONGER LIFE

 **CLOTHES THAT CAN BE RECYCLED**

DESIGNING FOR CIRCULARITY THROUGH OUR NEW CIRCULAR PRODUCT STANDARD

Circularity requires a mindset shift, from the way we design, create and re-use clothing, to what we do with it once it has reached the end of its life. We've committed to offering our customers clothes that are recyclable by design by 2027.

This year, we created Primark's Circular Product Standard (CPS). Our CPS is a framework for how we intend to design products now and in the future and is built on the Ellen MacArthur Foundation's (EMF) vision of a circular economy for fashion. We are a Network Partner of EMF, which is an international charity developing and promoting the circular economy. We also consulted closely with climate action NGO WRAP, circularity think tank Circle Economy and the non-profit sustainability educator Sustainable Fashion Academy, in addition to colleagues and other industry partners. It took over two years to develop and will be used by both our Product teams and suppliers. The CPS builds on our work from 2021 through Primark's participation in the EMF's Jeans Redesign project (2021-2023).



An important step in learning and embedding the CPS has been the launch of our first circular product range. Launching earlier this year, this 35-piece collection across womenswear, menswear and kidswear was made up of wardrobe staples such as denim and jersey. Every piece in the collection was designed and made to be re-loved or recycled with a focus on three key parts: more sustainably sourced materials, durability and recyclability. Through this collection, **over three million units** of circular clothing were sold.

EMBEDDING AND SCALING CIRCULAR DESIGN PRINCIPLES WITHIN OUR BUSINESS

Our goal is to scale circular design across all our clothing categories. To support this, we're focusing on upskilling within our business and amongst our suppliers. So far, 74% of Primark colleagues in our Product team¹⁵ have taken part in the Foundational CPS training. Our goal is to have all Product team colleagues trained to the Foundational level by the end of 2024. The training has been co-developed with Circle Economy and the Sustainable Fashion Academy, with three levels designed to engage colleagues based on their involvement with products. For example, buyers and designers will get involved in 'Expert' workshops, where they will co-create design guidelines in their categories, giving them first-hand experience in applying the CPS.¹⁶ The training will be mandatory for new starters in relevant teams.

We also have a dedicated Circular Product team within the business, which supports Product teams and suppliers in making these changes so they can apply circular design in their day-to-day work.

More broadly, we know the CPS can't stand still and we intend to keep evolving it to ensure it's in line with or ahead of legislation, as and when it is introduced in the various markets where we have our stores. We also plan to reflect the latest scaled developments in the world of textile recycling because what's deemed recyclable

today (and non-recyclable) will likely change. Finally, we aim to make the CPS more specific to the different clothes we sell, but this will be driven by specific research on each of these clothing types.

“Learning to design with a truly circular vision has been eye-opening. I was involved in the design pilot last year and seeing the product finally land in store was such an exciting moment for me and my colleagues. Customers loved the collection as it was all about essentials that can be paired up with wardrobe staples time and time again.”

**LAURA LEAHY,
ASSISTANT BUYER
FOR WOMENSWEAR, PRIMARK**

“To address our current take, make, waste, linear fashion industry, we must transition to a circular economy for fashion, where clothes are used more, made to be made again, and made from safe and recycled or renewable inputs. Through their participation in The Jeans Redesign, and development of their CPS, Primark is taking a step forward in its long-term circular economy journey. Now there is a clear pathway and a need to continue driving action, at pace and scale.”



**JULES LENNON,
FASHION INITIATIVE LEAD,
ELLEN MACARTHUR
FOUNDATION**

15. Product Team includes colleagues from Buying, Merchandising, Sourcing, Design and Quality.

16. More information on the circular design training framework can be found [here](#) (page 19):

PLANET

LEARN

WE CREATED A BIODIVERSITY MONITORING FRAMEWORK AND BEGAN PILOTING IT TO TEST THE METHODOLOGY AT SELECTED FARMS IN OUR PRIMARK SUSTAINABLE COTTON PROGRAMME

SCALE

APPROXIMATELY 70% OF OUR STORES ARE NOW POWERED BY RENEWABLE OR LOW-CARBON ELECTRICITY AND 141 STORES HAVE SWITCHED TO ENERGY-EFFICIENT LIGHTING

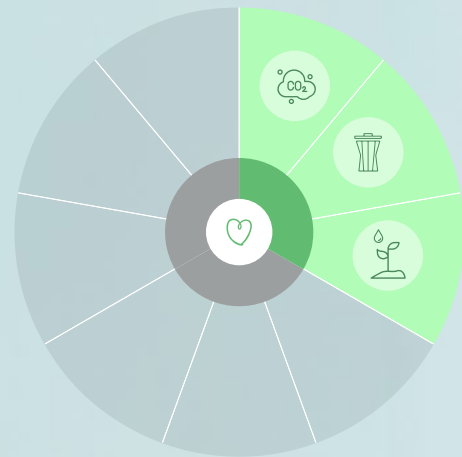
EMBED

OUR NEAR-TERM GHG REDUCTION TARGET HAS BEEN APPROVED BY THE SCIENCE BASED TARGETS INITIATIVE

PROTECTING LIFE ON THE PLANET

We all have a responsibility to protect the planet, and we know the fashion industry needs to adapt rapidly. Our commitments in our Planet pillar aim to address those areas where we believe we can have the biggest positive impact, in our own operations and our supply chain. Beyond these commitments, we also continue to take action in other areas such as water stewardship and sustainable chemicals management.

Our environmental sustainability initiatives target areas across our product supply chain, from the way raw materials are produced, to resources used in manufacturing, to the clothes hangers in our stores. We have a global team of environmental specialists within Primark accountable for driving initiatives across the business. As well as looking to improve our own operations, they work across the manufacturing regions within our supply chain, engaging with our suppliers' factories to support their improvement too.



OUR THREE PLANET COMMITMENTS

- 
Halve our carbon footprint – we will halve carbon emissions across our value chain by 2030.

- 
Eliminate non-clothing waste – we will eliminate single-use plastics and all our non-clothing waste by 2027.

- 
Restore biodiversity – our Primark Sustainable Cotton Programme will use more regenerative agricultural practices by 2030.



HALVING OUR CARBON FOOTPRINT

OUR APPROACH

Our [Environmental Policy](#) was developed in 2018 and updated in 2022. This policy contains six focus areas to guide our approach to reducing our impact on the environment including responsible sourcing; chemicals management; resources and waste; energy efficiency and greenhouse gas (GHG) reduction; water efficiency and conservation; and animal welfare and biodiversity.

As a signatory of the Fashion Industry Charter for Climate Action by the UNFCCC, we've committed to reducing absolute Scope 1, 2 and 3 emissions¹⁷ by 50% by 2030 against our financial year 2018/19 baseline. We're also signatories of Textiles 2030, a voluntary initiative led by WRAP, which includes a target to reduce the aggregate GHG footprint of new products by 50%.

Establishing our baseline was fundamental to tracking our progress against this commitment and this was set on our financial year 2018/19. We were careful to ensure our process for establishing our baseline aligned with relevant standards. We engaged the [Carbon Trust](#) to provide an independent review of our methodology when we set the baseline.

Primark's carbon programme focuses on managing climate-related risks. It aims to further embed analysis of climate-related risks and management to support operational continuity and better inform our climate strategy.

Find out more about Primark's transition plan in the TCFD section of the [ABF Annual Report 2023](#) (pages 56-67).

VALIDATION OF OUR EMISSIONS TARGET BY THE SCIENCE BASED TARGETS INITIATIVE

We're proud that, this year, our near-term science-based GHG emissions reduction target has been assessed and validated by the [Science Based Targets initiative](#) (SBTi). This important validation shows that our target is consistent with the global effort to combat climate change. It also sets a clearly defined path for us to work towards our goal, supported by the latest climate science criteria and recommendations by the SBTi.

OUR CARBON EMISSIONS DATA 2022/23

This year, there has been an overall increase of 11%^Δ in carbon emissions across the value chain compared to our baseline financial year 2018/19. This is as expected: Scope 1 and 2 emissions reduced but there was an increase in our Scope 3 emissions due to an increase in the volume of materials used to produce the higher number of products sold in the period year-on-year. In the short term, this trend is likely to continue. However, in the long term a decline is expected as we increase the use of more sustainably sourced materials across our product range and once the energy programmes being rolled out across the supply chain begin to deliver at scale.

GHG Protocol Category	2018/19 tCO ₂ e	2022/23 tCO ₂ e	Change against baseline year
Scope 1 and 2 (market-based)¹⁸	160,443	97,039	-40%
Scope 3	6,246,005	7,018,793 Δ	+12%
Total emissions	6,406,448	7,115,832 Δ	+11% Δ

More details on the methodology we used to define Scope 1, 2 and 3 priority areas can be found on pages 92-93 of the [ABF Responsibility Report 2023](#).



17. See Glossary for our definition of Scope 1, 2 and 3.

18. Scope 2 emissions for the 2018/19 baseline year were calculated using the location-based method, which uses location specific grid-average emissions factors. As Primark did not procure any renewable or low carbon power at that time, it is considered an appropriate methodology to establish baseline impact. For 2022/23, we are reporting under the market-based method, taking into account Primark's energy contracts and their associated emissions factors. We consider this to be a more accurate calculation method that can reflect the improved emissions performance achieved from renewable energy procurement.

HALVING OUR CARBON FOOTPRINT

REDUCING EMISSIONS IN OUR OWN OPERATIONS

97.5% of our base year carbon emissions occurred in our supply chain so a key focus for us is working with suppliers to tackle emissions and reducing their carbon footprint. However, we continue to look carefully at the footprint of our operations.

Scope 1 and 2 emissions include those generated by running our stores and offices, in addition to our transport and distribution centres. While significantly smaller than Scope 3, they include the areas where we have the most direct influence.

The introduction of efficiency measures and renewable or low carbon electricity procurement across our stores has produced an overall reduction of 40% in our Scope 1 and Scope 2 emissions (market based) compared to our 2018/19 baseline.

REDUCING ENERGY IN OUR STORES

Our stores need lighting and to be heated or cooled depending on the seasons. We've set ourselves the challenge to limit the amount of energy we use without impacting the shopping experience for our customers. We use a system, which we call the Energy Bureau, which allows us to manage our energy remotely by enabling us to monitor and modify environmental parameters to maintain suitable store conditions in an energy efficient manner. It also allows us to monitor and report on instances of energy wastage and address behavioural issues contributing to excessive energy use. This year, we've continued the roll-out of our Energy Bureau in the UK, which has now been introduced to 179 stores since 2021.

We've also been switching to energy-efficient LED lightbulbs in our stores. To date, we've installed these in 141 stores across eight markets, with the aim of reaching 110 more stores in 2024.

Our energy management system has maintained its certification to ISO 50001 (first achieved in November 2018) covering stores, offices and distribution centres. This certification covers all markets where we operate apart from Romania and Slovakia, as we only entered these markets during the year. Both will be incorporated into our audit and accreditation next year. Maintaining this certification shows a commitment to continuous energy-efficiency improvements and reductions.

“Over 90% of our direct energy costs relate to our stores, so we've been looking at ways to reduce usage. We've switched to LED lightbulbs, reducing our energy consumption by up to 35% per store. By the end of 2024, over 50% of our stores will have LEDs installed, that's approximately half a million lightbulbs, which will last longer and need replacing less.

We're also using technology to help us optimise our energy usage. We've introduced a new system in most of our UK stores, which works with our existing system, to remotely monitor and manage the in-store environment, and therefore the energy usage. Known as the Energy Bureau, we can adapt the heating, ventilation and air-conditioning to ensure the air quality in store is optimal, including temperature, humidity and CO₂ levels, and which can be adapted based on time of day, season and occupancy levels. It also monitors for energy wastage and addresses issues, for example turning lights off when they're not needed.”



WILLIAM NEGUS,
GROUP ENERGY MANAGER
PRIMARK

INTRODUCING RENEWABLE ENERGY IN OUR OPERATIONS

As we move forward with our strategy to switch all our stores to renewable energy, we've now signed contracts with providers in eight regions, covering Austria, Belgium, France, Great Britain, Netherlands, Northern Ireland, Republic of Ireland and Spain. At the time of publication, approximately 70% stores are powered by renewable or low-carbon electricity contracts. However, as these contracts have come into operation at different times over the course of the year, we've not yet been able to report fully on their benefit. Looking ahead to 2024, we'll continue the roll-out and we're also exploring further ways to reduce emissions from our on-site heating too.

REDUCING EMISSIONS IN OUR VALUE CHAIN

Like most other clothing brands, we don't own any of the factories in our supply chain. However, we're committed to working with suppliers to help reduce their carbon emissions while making our products. Our roadmap has identified four priority areas:

- **The manufacturing of our products (including tiers 1, 2 and 3):** this includes the emissions coming from the energy used in manufacturing processes;
- **The sourcing of material types for our products and associated emissions;**
- **Upstream transportation:** transporting goods from suppliers to Primark depots, and depots to Primark stores, produces significant emissions; and
- **The use of products once they leave our stores:** the way customers use and care for our products generates emissions, and we want to help people reduce these.

PARTNERING WITH SUPPLIERS

Over the past two years, we've been working on a decarbonisation programme with key suppliers, which focuses on improving energy efficiency, reducing the energy intensity of manufacturing goods and moving away from a carbon-intensive fuel mix within manufacturing under tier 1, tier 2 and tier 3 of our supply chain. This builds on the learnings of our energy and water efficiency pilot projects conducted in recent years in China using the Apparel Impact Institute (Aii) Clean by Design (CbD) programme. We're expanding our use of CbD initiatives alongside our own bespoke programme, which we're building and launching with partners in key sourcing regions.

HALVING OUR CARBON FOOTPRINT

“The garment industry is very important to Bangladesh and we want to ensure our businesses are viable for the long term, so it’s important for us to make the switch to renewable energy. We’re grateful for the support Primark is giving us in this space.”



**HASAN MAHMUD,
SILK ROUTE SOURCING LTD
AND PRIMARK SUPPLIER**

We’re partnering with industry experts to evaluate our supplier factories’ use of resources, with a focus on making them more energy efficient. Engineers visit each facility and create a bespoke plan for our suppliers. We call this the ‘optimisation process’ and training of the factory operational staff and management is central to this.

We’ve now scaled our efficiency programmes to engage **57 factories** in Bangladesh, China and Cambodia.

Suppliers involved in the programme learn about more energy-efficient practices. They get support on data collection and analysis to create their own emissions reduction action plan, while improving manufacturing processes. These programmes create improvements in factory operations by delivering training, guidance and workshops. A range of factory types are being engaged in this first wave of ‘enhanced pilots’ to assess the programme’s effectiveness in energy and water reduction. A project can take up to two years to complete, at which point measurable improvements are expected, with roadmaps for further reduction over time.

BUILDING OUR SKILLS TO SUPPORT OUR SUPPLIERS

To further support our suppliers in their energy-reduction ambitions, we’ve recently hired three Regional Carbon Leads across Bangladesh, China and India. They will provide on-the-ground strategic support to key suppliers to help reduce their emissions.

“We’re working with key suppliers to help reduce their energy consumption. We partner with industry experts to evaluate our supplier factories’ use of resources. Engineers visit each facility and create a bespoke plan, which could include steps such as insulating heated pipes and switching off machinery when it’s not needed, to the cleaning or upgrading of equipment, such as boilers or dryers. This process takes up to two years and is complex so requires detailed training, but they’re vital steps. One of Primark’s key suppliers has already installed solar panels on their factory roof, which supply 30% of the energy required to power their facility.”



**PRITOM CHOWDHURY,
BANGLADESH CARBON LEAD,
PRIMARK**

COMBINING PURCHASING POWER FOR RENEWABLE ENERGY

Many individual factories struggle to negotiate contracts with suppliers, which makes it difficult to access alternative energy sources. Through [Ren Energy](#), we’re working to pool some of the factories we work with so they can use their combined purchasing power to assist them in negotiating contracts.

Having assessed the data gathered with Ren Energy last year, we’ve mapped the energy and carbon associated with supply chain locations and considered the feasibility of renewable energy procurement solutions for suppliers’ factories by country and region. The first procurement record effort across a number

of factories is underway, with Ren Energy leading the process, including analysing bids and providing strategic guidance to suppliers on contract negotiation.

UNDERSTANDING THE ENVIRONMENTAL IMPACT OF OUR SUPPLY CHAIN

We use an industry-leading tool to better understand the environmental performance of our suppliers factories, the [Higg Facility Environmental Module](#) (FEM). Factories that make up over 70% of Primark’s turnover were invited to complete the assessment.

In 2022, 1,233 facilities completed their Higg FEM self-assessments. Of that group, 455 sites verified their self-assessment and had an average score of 53%.¹⁹ Having sight of these scores allows factories to identify opportunities for improvement in environmental performance.

We’re still gathering data from the 2023 Higg FEM roll-out; however we’ve already seen an increase in the percentage of factories verifying their FEM scores and an increase in the average score of those verified factories.

We also put our China supply chain through the Green Supply Chain CITI evaluation, developed by the [Institute of Public & Environmental Affairs](#) (IPE), which assesses how well the supply chain is being managed from an environmental point of view. In 2023 Primark improved its CITI score compared to last year, ranking number [seven out of 126 companies](#) in the textile industry. This is a result of our continuous efforts to improve the environmental performance of suppliers in China beyond our first tier. Primark is now among the 30 leading brands in the [IPE brands map](#).²⁰

19. Figures fluctuate due to suppliers connecting and disconnecting with Primark on the platform on an ongoing basis.

20. The Green Supply Chain Corporate Information Transparency Index (CITI) assesses brands on the environmental management of their supply chains in China. The evaluation uses government supervision data and public information published by the brand to assess overall supply chain environmental management. Scores are updated throughout the year as brands continuously work with their suppliers to respond to pollution issues as they arise. The CITI report has been published annually since 2014. More information can be found here: <https://www.ipe.org.cn/GreenSupplyChain/CITI.html>

ELIMINATING NON-CLOTHING WASTE

REDUCING NON-CLOTHING WASTE

As one of our main sources of non-clothing waste, reducing product packaging is a priority focus for us. We've committed to remove all single-use plastics (SUP) by 2027. Since 2019, we estimate we have removed and/or avoided²¹ over 1 billion units of SUP from our business.

Our dedicated team, within our Packaging Centre of Excellence, is currently establishing a baseline to help us accurately measure the reduction of SUP year on year. Any future packaging improvements will be tracked against this baseline, and reported on, in line with our Primark Cares objectives for the removal of SUP. As we don't purchase the packaging directly, we're reliant on accurate information from our suppliers, and we are currently working with them to collect this information. We aim to begin tracking against this new baseline next year.



DECREASING PLASTIC PACKAGING IN OUR OPERATIONS

CLOTHES HANGERS

Clothes hangers are estimated to account for around two thirds of total SUP volumes used within Primark. We're aiming to move to recycled materials for all hangers – helping to reduce the carbon footprint of hangers by 40%.²² The durable new hanger design will be made of a minimum of 90% recycled polypropylene and can be used multiple times. Alongside reusing hangers retained in stores, we will collect unusable hangers to be recycled and made into new hangers.

PACKAGING FILM

The second largest use of plastic packaging is the film used to protect our garments during transit. We've developed a process to collect the waste film from UK distribution centres and send it to partners for separation and processing. The reprocessed material is transformed into Post Consumer Recycled (PCR certified) pellets which are then used to manufacture new film.

Where there is no alternative material plastic currently available, we're increasing our use of recycled content in our plastic packaging, helping minimising our reliance on virgin materials.

LADIES' BRIEFS

There are some items that need packaging for protection or hygiene reasons, for example, ladies' briefs. This year, we've removed the SUP hook and replaced it with a cardboard alternative that's colour-coded to help customers find the right size. We've also reduced the thickness of the plastic bag from 65 micron to 60 micron. And while this may seem like a small difference, it has helped us reduce our plastic use by 2.7 tonnes. We've made similar changes in other ranges, such as replacing the plastic hook with cardboard one on a number of items in kidswear socks and tights. We've also trialled a new baby clothes range designed with cardboard hangers.

MANAGING THE RISK OF DEFORESTATION

For cardboard packaging, our wood fibres must be certified by the [Forest Stewardship Council \(FSC\)](#) or another recognised forest management certification scheme, such as the [Programme for the Endorsement of Forest Certification \(PEFC\)](#). The certified wood is harvested from forests that are responsibly managed and economically viable. Our iconic paper shopping bag is made from 100% recycled materials and can be recycled after use.²³

Over the last few years, we've also been exploring next-generation alternatives to wood fibre. Primark is part of Canopy's [Pack4Good](#) initiative, which is working to ensure companies move away from forests to use more sustainable paper packaging options and reduce dependency on virgin wood-derived packaging.²³

RECYCLING AND MANAGING OUR OWN WASTE

We diverted 96% of the waste we produce from our own operations from landfill this year. We continue to educate colleagues – both in retail and head office – on how non-clothing waste can be reused or recycled.

As a priority, we plan to standardise waste management across Primark operations to help us spot where waste can be handled in a better way. We trialled processes in the UK and Republic of Ireland stores last year, and we're now piloting this approach in European stores.

As we grow our business into new markets, we need to adapt our approach to waste to meet different local legislation and collection services. To overcome this challenge, we continue to build relationships with partners and contractors to proactively plan the best way to deal with our waste.



21. SUP removed: This relates to products that have had SUP removed from their packaging. SUP avoided: This relates to products within the same subcategory, performing the same function in alternative colour or style, that have had SUP removed from its packaging. The removal of SUP for these products has therefore prevented the new styles from containing SUP in their packaging.

22. 40% is a modelled projection based on packaging carbon data from our supplier Mainetti.

23. Provided there is recycling infrastructure available where the bag is disposed and the paper is dry and clean.

OTHER AREAS OF FOCUS IN ENVIRONMENTAL SUSTAINABILITY

WATER AND WASTEWATER

OUR APPROACH TO WATER STEWARDSHIP

Global water resources are under growing pressure driven by a combination of increasing freshwater demand and climate change. The UN estimates a 40% shortfall in clean freshwater by 2030. Climate change will also impact weather patterns, leaving some areas prone to flooding, while water mismanagement is leaving other areas increasingly vulnerable to water scarcity and poor water quality.

Since water is used at most stages of making our clothes, from growing cotton to dyeing fabrics, it's important that it's used efficiently.

This year, we began developing our 2030 Water Stewardship Strategy with a view to reducing our supply chain's dependency on water and limiting the possible negative impacts associated with excessive water consumption and potential water pollution. To achieve these goals, we're working to implement initiatives to reduce the water footprint of the products we sell. We're also working with other stakeholders through multilateral collective action initiatives to drive improvements at scale and address shared water challenges.

UNDERSTANDING OUR WATER FOOTPRINT AND RISKS

We are signatories to WRAP's Textiles 2030 initiative and this means we've signed up to a target to reduce the water footprint of new products we sell by 30%. This year, we've been working to establish the baseline of our water footprint across our supply chain. We expect the results by the end of 2023 and this will enable us to measure our progress towards our water footprint target.

Water risks and challenges vary depending on geographical location. This year, we also mapped our strategic tier 1 and tier 2 supplier factories to assess the likelihood of water risks materialising. We've used spatial tools such as WWF Water Risk Filter and WRI Aqueeduct to map geographical hotspots for water

risks related to climate change, like flooding, scarcity and diminished water quality. Using data from key suppliers, we've been able to apply water withdrawal and consumption data to identify areas where water could pose a risk to our supply chain. With these insights, we now have greater understanding to help drive forward our strategy and are prioritising efforts to mitigate those risks.

The highest proportion of our industry's water footprint is known to originate from raw material cultivation and extraction, primarily from cotton. Through our PSCP, we're training and influencing farming practices to improve resource efficiency. More information can be found on our PSCP [here](#).

COLLABORATION FOR IMPROVED WATER MANAGEMENT

Most of the negative impacts associated with water consumption in textile factories are at the wet processing stages, which includes bleaching and dyeing. Energy and water consumption during these stages are intrinsically linked since most of the energy usage is during water-intensive processes. Between 2018 and 2022, Primark worked with the Apparel Impact Institute ([Aii](#)) to enrol six factories onto the Clean by Design (CbD) energy and water efficiency initiative. More information can be found [here](#).

In addition to working with suppliers to improve water efficiency and to recycle water where possible, we're also committed to collective action, working with other brands and trade associations to address shared water challenges. We joined the Alliance for Water Stewardship ([AWS](#)) in 2021 and became a Funding Member in 2022. This supports our approach to improve the use of water resources and our commitment to adopt and promote a universal water stewardship framework, the AWS Standard. Through an AWS-led Impact Accelerator programme, we committed to our first collective action project this year, enrolling 15 key suppliers based in Dhaka, Bangladesh. The programme is designed to bring brands, governing bodies and other stakeholders together to tackle shared water challenges within a water catchment area. As part of the programme, an independent, local third party, Esolve International, has

conducted a holistic catchment assessment to support our better understanding of the relationship between industry and the local environment.

Next year, we will build on our collective action ambitions through participation in a second impact accelerator programme in Chennai, India.

Between 2018 and 2022, Primark worked with the Aii to enrol

6 factories onto the Clean by Design (CbD) energy and water efficiency initiative

Through an AWS-led Impact Accelerator programme, we committed to our first collective action project last year, enrolling

15 key suppliers in Dhaka, Bangladesh



OTHER AREAS OF FOCUS IN ENVIRONMENTAL SUSTAINABILITY

CHEMICALS MANAGEMENT

Chemicals play an important role in clothing manufacturing. From synthetic fibres like polyester, to the complex molecules used to dye fabrics, or the fertilisers used when growing cotton, chemistry is essential. Chemical technologies also have the potential to improve the performance and environmental impacts of our products.

Though chemicals are critical to our industry, given the possible risks and hazards that the mismanagement of chemicals can pose, we support our suppliers and their facilities with tools and guidance to use and manage them in the right way. From how chemicals are procured and stored, to how they are used or disposed of, chemicals management practices are critical for protecting workers and the environment. In addition to good chemicals management, driving the use of more sustainable chemistry will support us in delivering on many targets under Primark Cares, from reducing energy and water consumption to protecting workers in our supply chain.

COLLABORATING WITH INDUSTRY EXPERTS

We work closely with industry experts to help us improve chemicals management across our supply chain. In 2021 we joined the Apparel and Footwear International RSL Management (AFIRM) Group to collaborate with brands and shape the tools used to manage chemicals in our industry.

We have also been active members of the Zero Discharge of Hazardous Chemicals (ZDHC) since 2015, and continue to have a seat on their Board of Directors. As part of this commitment, we complete an annual assessment of our chemical management programme. This year, our performance was rated as 'Progressive' in recognition of our continuous improvement.

WORKING WITH SUPPLIERS TO MANAGE CHEMICALS

In our supply chain, many of the chemicals used are during wet processes such as the dyeing, printing and washing of our materials.

For over a decade, we've had a robust chemicals management programme in place. Our Restricted Substance List (RSL) sets strict limits on chemicals used in manufacturing our products. Our RSL aligns with that of the AFIRM Group and the ZDHC Manufacturing Restricted Substances List (ZDHC MRSL), Version 3.1.

We're committed to supporting our suppliers with the tools and guidance needed to use chemicals safely. Our local ETES teams based in our sourcing regions, engage directly with Primark-approved factories to provide awareness and training in relation to chemicals management. This includes requirements for all factories we work with to compile and submit chemical inventories so that we can assess their usage of chemicals in reference to the ZDHC MRSL. In 2022, 175 key wet processors generated ZDHC InCheck reports.

Our ETES team delivers regular training on our chemicals management requirements to suppliers and wet processors in the supply chain. With our support, 80 factories completed ZDHC's Supplier to Zero programme, focused on improving chemicals management systems. A further 61 wet processors have been selected to complete ZDHC Chemical Management System training, which includes support from a consultant to identify improvements and help put them into practice. This ongoing training builds knowledge and understanding in order to enable better implementation of chemicals management tools and improve safety.

We also want to go beyond chemical risk and help suppliers to use chemicals more efficiently. We have selected three wet processors to pilot Aii's Clean by Design Chemistry and Wastewater programme, focused on reducing chemical consumption and improving other areas like greenhouse gas emissions.

TESTING WASTEWATER

We've been working with our suppliers to put in place new requirements, focusing on the countries where the majority of the wet processors in our supply chain are based. Our wastewater testing programme began in Bangladesh, and we've since expanded it to include facilities in China, India and Turkey. Last year, 107 of our strategic wet processors tested to the ZDHC Wastewater guidelines, and we have selected a further 20 facilities to carry out targeted, risk-based testing.²⁴ As we look to further scale our wastewater testing programme, we've worked with other brands to host webinars in key sourcing regions to explain the importance of monitoring and improving wastewater.

Monitoring wastewater test results allows us to confirm that discharges have been treated effectively, with the overall goal of improving the quality of discharged wastewater. It also detects any substances included in the ZDHC MRSL, which helps to monitor the conformity of chemical inventories against the ZDHC MRSL.

107
of our strategic wet processors tested to the ZDHC Wastewater Guidelines, and we have selected a further 20 facilities to carry out targeted, risk-based testing

175
key wet processors generated ZDHC InCheck reports

61
wet processors have been selected to complete ZDHC Chemical Management System training

24. ZDHC has updated its Wastewater Guidelines to V2.1. Guidelines apply to certain facilities such as those discharging wastewater above a daily threshold (15 m³/day).

OTHER AREAS OF FOCUS IN ENVIRONMENTAL SUSTAINABILITY

OUR APPROACH TO ANIMAL WELFARE

As we increase the use of more sustainably sourced materials across our product range, we continue to ensure that animal welfare is an integral part of our selection criteria. Animal-derived materials make up less than 1% of the materials used in Primark products, but we are committed to ensuring that any that are used are responsibly sourced²⁵. In October 2021, we updated our Animal-Derived Material Policy with a focus on traceability and transparency. We support the development of animal welfare standards and certifications, and our policy requires that our suppliers comply with these industry standards in the sourcing of Primark products. For example, within our policy we require that all feather, down, alpaca and mohair are certified to the Responsible Down Standard or IDFL Down Standard, the Responsible Alpaca Standard and the Responsible Mohair Standard respectively. We also encourage the use of the Responsible Wool Standard for the sourcing of wool but require all wool to be sourced from sheep that have not been mulesed. We do not conduct or support the use of animal testing that is not required by law.

We're proud that our own-brand cosmetics are approved by the [Leaping Bunny Program](#), an internationally recognisable gold standard for products that are cruelty-free. This includes make-up, skincare and haircare products which feature the Leaping Bunny logo, a visible reminder that cosmetics at Primark are not tested on animals. We monitor across our supply chain to ensure compliance with the Leaping Bunny criteria. At the time of being awarded certification in 2021, it was one of the largest ever undertaken by Cruelty Free International. Our Animal-Derived Material Policy can be accessed [here](#).



25. Materials include wool, cashmere, leather and silk.

PROTECTING LIFE ON THE PLANET

 **RESTORE BIODIVERSITY**

EXPLORING THE CONNECTION BETWEEN BIODIVERSITY AND OUR PSCP

WHY IS BIODIVERSITY IMPORTANT FOR THE FASHION INDUSTRY

As humans, we rely on biodiversity for the nutritious food, medicines and materials we need. As populations grow, increasing demand for resources is putting a heavy strain on nature. According to the WWF, there has been, on average, a 69% decline in the global population of mammals, birds, reptiles, amphibians and fish since the 1970s²⁶. Primark depends on the agricultural sector for the sourcing of raw materials, such as cotton, which is why we're continuing to focus efforts on understanding how to reduce our impact.

ACCESSING OUR BIODIVERSITY RISKS

Cotton is the main fibre used in our clothing and the way we source cotton is core to our biodiversity strategy. Building on 10 years of experience from our PSCP, we recognise that growing cotton more sustainably depends on healthy soil and pollination, both of which are linked to biodiversity. In February 2021, we commissioned an independent biodiversity risk assessment of our supply chain, carried out by our partner [Biodiversify](#), a biodiversity consultancy. This assessment was aligned with the [Interim Guidance for the Science Based Targets for Nature](#). The assessment concluded that raw material production poses the most significant risks to biodiversity. In 2022, we worked with Biodiversify to develop a Biodiversity Monitoring Framework for our PSCP programme, that aligned with the Science Based Targets for Nature (SBTN), the Task Force on Nature-related Financial Disclosures (TNFD) and the International Union for Conservation of Nature (IUCN) guidelines for planning and monitoring corporate biodiversity performance.

In April and August 2023, the first pilot biodiversity field surveys were carried out on 18 PSCP farms in Gujarat, India, in partnership with the [Srushti Conservation Foundation](#). The objective of this pilot was to evaluate what survey methodologies would be most effective in the field. The results of this pilot will help inform next steps for the evolution of the framework and the monitoring programme.

Collecting this data and setting a baseline through the Biodiversity Monitoring Framework is just the beginning, but it's an important development to enable us to measure progress. It is likely to take several years before we see the impacts of more regenerative practices within our PSCP but this framework will enable us to track progress and shape the design of future intervention strategies.



26. WWF Living Planet Report 2020

PEOPLE

SCALE

TOGETHER WITH OUR PARTNER, WE'VE DEVELOPED A MEASUREMENT FRAMEWORK TO BETTER UNDERSTAND THE IMPACT OF OUR PROGRAMMES IN OUR SUPPLY CHAIN

LEARN

WE'RE WORKING ON A PILOT USING THE FAIR LABOR ASSOCIATION'S FAIR COMPENSATION TOOLKIT TO COLLECT WAGE DATA IN FACTORIES ACROSS BANGLADESH, CAMBODIA, INDIA AND TURKEY

EMBED

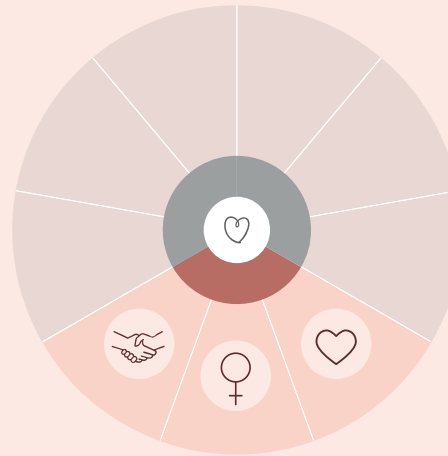
WE'RE SUPPORTING WORKERS IN BANGLADESH TO UNDERSTAND MORE ABOUT MENTAL HEALTH THROUGH OUR NEW PROGRAMME MONER KOTHA, TAKING LEARNINGS FROM ANOTHER INITIATIVE IN INDIA, MY SPACE



IMPROVING PEOPLE'S LIVES

We have a long-standing commitment to support decent and safe workplaces for the people who make our clothes. As outlined earlier in this report, our [Supplier Code of Conduct](#) and [Supply Chain Human Rights Policy](#) set out the conditions that all our suppliers must follow to work with us.

For over a decade, our ETES team has been running and building programmes and initiatives in a number of sourcing markets to support the livelihoods of the people who make our products. Our Primark Cares commitments help to clarify and amplify our ambitions in this space.



OUR THREE PEOPLE COMMITMENTS



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.



Promote equal opportunities for women – we will strengthen the position of women through skills development, addressing their barriers to progression by 2030.



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



IMPROVING PEOPLE'S LIVES

OUR GLOBAL REACH

Our social impact programmes span our key sourcing markets and, to date, have reached over 600,000 workers in our supply chain.

9
countries

34
initiatives

40
external partners

800+
factories engaged

600k+
workers

TURKEY PROJECTS

- Refugee Recruitment Support
- Worker Support Centre
- Snowball
- JustMaxIt

CHINA PROJECTS

- Promising Futures
- C-IQ Worker App
- EHS Now!
- CoC E-Learning Platform

BANGLADESH PROJECTS

- Social Dialogue Programme
- Gender Sensitive Workplaces
- Industrial Relations Training
- Sudokkho
- P Ashe Achi
- Amader Kotha Hotline
- Janbo Mora Janabo
- Moner Kotha
- Bridging Solution

SOUTH EAST ASIA PROJECTS

Cambodia

- STOP

Myanmar

- My Life
- SMART
- Counselling Corner

Vietnam

- Respectful Workplaces
- Drama for Change
- Bright Futures

INDIA PROJECTS

- My Life
- My Journey
- My Space
- Maitri
- Securing Future
- Haqdarshak
- Ungal Kural

PAKISTAN PROJECTS

- HERessentials
- GM Support
- Hamary Awaz

CREATING FINANCIAL RESILIENCE

PURSuing A LIVING WAGE FOR PEOPLE IN OUR SUPPLY CHAIN

We've made a commitment to pursue a living wage for workers in our supply chain. Like other retailers and brands, we don't own any of the factories that make our products and we're nearly always one of many customers that a factory is working with. As we share our supply chains with other retailers and brands, to drive long-term change we need to pursue a living wage in a collaborative way.

We continue to work with industry partners to achieve this goal. Since 2015, we've been a member of [ACT](#) (Action, Collaboration, Transformation). ACT is a ground-breaking agreement between trade unions, global brands and retailers seeking to transform the garment, textile and footwear industry and achieve living wages for workers. We continue to support the [Global Living Wage Coalition's](#) (GLWC) definition of the living wage. The GLWC uses the [Anker methodology](#) when setting its benchmarks, which is a salary based on a normal working week, without any overtime, that pays a decent standard of living for a worker and their family.

Funding living wage benchmarks is key to support our work on measuring the gap to a living wage in our supply chain. This includes Vietnam and other countries as we expand our use of the Fair Labor Association's (FLA) Wage Tool. We've also recently become a corporate sponsor of the [Anker Research Institute](#) (research arm of the GLWC). We also work with the Ethical Trading Initiative (ETI) on the Learning and Implementation Community (LIC) on responsible purchasing practices. We are one of nine ETI brands in the LIC, sharing learning with peers and shaping resources aimed at supporting other brands within the garment industry. See [here](#) for more information.

27. For reference see: [From Covid-19 to Living Wages ACT 2020 update](#) (page 10).

OUR ROADMAP

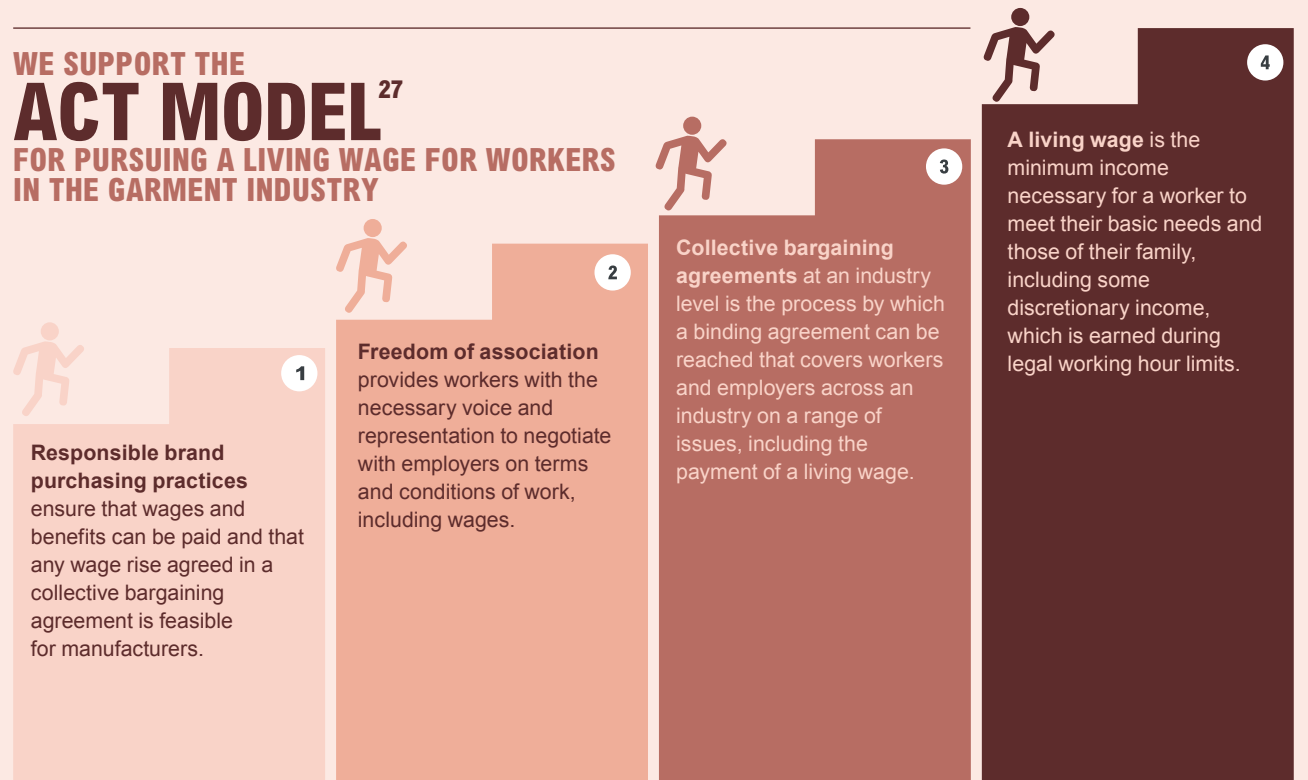
Our ambitions in this space require input from colleagues from across the business with representatives from over 10 different teams being involved, including Legal, Finance, ETES, Sourcing and Primark Cares. We've drawn up an approach initially focusing on:

- Improving our purchasing practices in line with ACT's global [purchasing practices commitments](#);
- Piloting the Fair Labor Association (FLA) Wage Tool; and
- Proactive industry collaboration.

WHAT IS A LIVING WAGE?



WE SUPPORT THE ACT MODEL²⁷ FOR PURSUING A LIVING WAGE FOR WORKERS IN THE GARMENT INDUSTRY



1 **Responsible brand purchasing practices** ensure that wages and benefits can be paid and that any wage rise agreed in a collective bargaining agreement is feasible for manufacturers.

2 **Freedom of association** provides workers with the necessary voice and representation to negotiate with employers on terms and conditions of work, including wages.

3 **Collective bargaining agreements** at an industry level is the process by which a binding agreement can be reached that covers workers and employers across an industry on a range of issues, including the payment of a living wage.

4 **A living wage** is the minimum income necessary for a worker to meet their basic needs and those of their family, including some discretionary income, which is earned during legal working hour limits.

CREATING FINANCIAL RESILIENCE

IMPROVING OUR PURCHASING PRACTICES

As a member of ACT, we've committed to improving our purchasing practices globally in five areas. We use ACT's Accountability and Monitoring Framework to measure our progress.

1. WAGES AS ITEMISED COSTS

In 2020, we included a standard minute value²⁸ in our costing sheet for suppliers, however upon review, we realised this was not being completed consistently by suppliers. We recognise this as a key enabler in our commitment to pursue a living wage, so this year, we've grown our team to include a colleague with over 20 years' buying experience at Primark to address this challenge. Specifically, we are now building out training that will be rolled out to all Buying team colleagues and our suppliers to drive compliance with this requirement.

“WORKING COLLABORATIVELY WITH PRIMARK ON THE ‘WAGES AS AN ITEMISED COST’ PROJECT HAS GIVEN US A VALUABLE PLATFORM FOR ENGAGING IN OPEN DIALOGUE ON ONE OF THE TOUGHEST SYSTEMIC ISSUES FOUND IN APPAREL SUPPLY CHAINS. IT’S GREAT TO SEE A RETAILER COMMITTED TO FINDING A PRACTICAL SOLUTION THAT WORKS FOR ALL STAKEHOLDERS.”

PRIMARK SUPPLIER

2. FAIR TERMS OF PAYMENT

This year, 93% of suppliers were paid within the agreed time frame. We continue to offer our suppliers 30-day standard payment terms, which we have done for many years.

3. BETTER FORECASTING AND PLANNING

We're implementing a new system to ensure we can apply better forecasting and planning within our business. In development for a number of years, this year we've begun running trials on longer-term forecasting with some of our key suppliers.

4. TRAINING ON RESPONSIBLE SOURCING AND PLANNING

We're committed to train all relevant colleagues on what responsible purchasing practices mean for Primark and how they can be implemented. 730 colleagues from the Product and Sourcing teams completed the initial awareness training in 2022 and, in 2023, we've extended this training to more teams. Later this year we will also be trialling a platform for suppliers to help improve their understanding too.

5. RESPONSIBLE EXIT STRATEGIES

We have implemented the [ACT Responsible Exit Policy and Checklist](#), developed in 2019/20. As part of our continuous improvement to this commitment, we conducted a review of the process in 2022 and strengthened our internal due diligence to ensure further compliance. Any exit of a supplier's factory includes a review of the factory's dependency on Primark and any possible impact on their workers as a result of our exit. We still continue to honour existing orders the factory has with us.

OUR RESPONSIBLE EXIT FROM MYANMAR

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

Following the ETI report we worked closely with global trade union IndustriALL and other major brands to create a [framework for responsible business disengagement from Myanmar](#) with input from the OECD's Centre for Responsible Business Conduct in Paris (OECD). This new framework aligns with our long-standing global approach to responsible factory exit under the terms of our membership of ACT, but takes into account the very specific context of Myanmar post the coup in 2021 and the guidelines of the OECD. The framework has guided our responsible exit from Myanmar which is conducted with frequent consultation with [IndustriALL](#) and other relevant stakeholders. Final orders from Myanmar were shipped at the end of October this year. The Primark team in Yangon will remain in operation for a number of months to check that our suppliers make any final wage and other associated payments that may be due to workers in connection with Primark orders.

Our announcement to stop placing orders in Myanmar didn't mark the end of our efforts to support workers in the country, which has continued throughout the responsible exit process. We continue to work closely with factories, suppliers, trade unions, basic labour organisations and project partners to seek remedy for issues that arise and, where possible, build capacity for the factories' management and mitigate the impact to the workers in our suppliers' factories. Since October 2022, we've increased the size of our ETES team in Yangon from three to eight people, enabling more frequent visits to our suppliers' factories to allow greater engagement and improved visibility. Furthermore, we launched new events for groups of workers this year in our My Life programme with our partner [Girl Determined](#). Between 2019 and 2022, this programme trained 1,231 workers in our supply chain in Myanmar. Feedback from workers indicated that the communication skills of workers improved, in addition to a greater ability to identify and reduce stress. In July 2023, Girl Determined also delivered seven events to over 80 workers. These events focused on topics such as self-confidence, gender-based violence, self-defence and communication. Although these programmes will end when we exit Myanmar, they've delivered a positive impact for workers while they were being run.

28. The Standard time calculated to perform the sewing operation of a garment

CREATING FINANCIAL RESILIENCE

MEASURING AWARENESS OF RESPONSIBLE PURCHASING PRACTICES WITHIN OUR BUSINESS

Earlier this year, we participated in ACT’s second global survey as part of their Accountability and Monitoring Framework, with 413 colleagues across the Buying, Merchandising, Design, Quality and Sourcing (BMDQS) teams completing the survey. Respondents were asked to rate how Primark performed against ACT’s global purchasing practices commitments. Almost all scores increased against the results of the survey carried out in 2021. However, there is still work to be done and we’re working on improving in all areas, including price quotations, training and awareness.

ACT 2023 survey*

Primark results

Sourcing practices	4.6	0
Forecasting and capacity planning	4.1	+0.3
Price quotations	3.8	+0.4
Price negotiation	4.3	+0.1
Product development	4.4	+0.1
Sampling	3.9	+0.2
Order placement	4.4	0
Changes to orders	4.5	+0.1
Re-orders	4.5	+0.2
Production and lead time	4.4	+0.1
Sales and transparency	3.5	+0.2
Terms of payment	4.6	0
Training and awareness	3.5	+0.7
Incentives	3.4	+0.4
Buyer-supplier relations	4.4	+0.2
Strategy and alignment	4.6	+0.1

■ 2023 Primark's Average PPSA Scores (PPSA = Purchasing Practices Self-Assessment) ■ Difference in score compared to 2021

* 5 is the highest possible score and 0 is the lowest.

Scoring key:

- 1.0 = No / Never
- 2.0 = Planned but not in place / rarely
- 3.0 = As often as not / in place but needs improvement
- 4.0 = Usually
- 5.0 = Always / Well established and effective

Act survey from 2021 can be found here: <https://actonlivingwages.com/app/uploads/2021/11/ACT-purchasing-practices-report-2021.pdf>

Supplier scoring

Sourcing practices	4.6	-0.1
Forecasting and capacity planning	4.2	+0.1
Price quotations	3.7	+0.1
Price negotiation	4.2	+0.2
Product development	4.6	+0.1
Sampling	3.9	+0.3
Order placement	4.7	0
Changes to orders	4.1	0
Re-orders	4.7	+0.3
Production and lead time	4.3	+0.1
Sales and transparency	3.8	+0.3
Terms of payment	4.5	0
Training and awareness	4.0	+0.2
Incentives	3.7	+0.7
Buyer-supplier relations	4.3	+0.2
Strategy and alignment	4.5	+0.1

■ 2023 Primark's Average PPA Scores (PPA = Purchasing Practices Assessment) ■ Difference in score since 2021

MEASURING THE GAP TO A LIVING WAGE IN OUR SUPPLY CHAIN

We carry out social audits in all the tier 1 factories we source products from. As part of this, we check that workers are paid as per local legal minimum wage requirements. We are working to build a deeper understanding of how this compares to the living wage benchmarks published by the GLWC.

This year, we co-funded research by the Anker Research Institute (co-founder of the GLWC) on gender pay gaps in garment and agricultural supply chains. The research looked at the pay of men and women working in factories and farms in five countries, including Bangladesh and Turkey, where we source from. The report will be published in early 2024.

We’ve subscribed to the FLA’s Fair Compensation Toolkit to pilot collecting wage data in factories across four of our key sourcing markets: Bangladesh, Cambodia, India and Turkey. We funded the translation of the tool into Bangla, Hindi and Tamil to support the key languages spoken by management and workers in these factories. We’ve trained our Ethical Trade team in those countries to ensure they’re equipped to support factories during the data collection process. We selected a range of factories for the pilot taking into account attributes such as size of workforce, gender split and capacity of Primark within the factories. This is to give us a good understanding of our supply base before we look to expand the project. We intend to use the FLA Wage Tool to help factories understand their gap to the living wage and to support them to close that gap.

“This pilot project was very knowledgeable for us. Now we understand how to calculate, find out and compare the wages across sections of the factory and gender. This wages survey format was very easy to use.”



ARAP KUMAR SAHA, ADMIN, HR AND COMPLIANCE, MODELE DE CAPITAL, PRIMARK SUPPLIER INVOLVED IN THE FLA PILOT

CREATING FINANCIAL RESILIENCE

STRENGTHENING THE FINANCIAL LITERACY OF PEOPLE IN OUR SUPPLY CHAIN

Financial education and access to financial services play a key role in helping people to manage their lives. Many garment workers lack both these things and, often compounded by gender norms and limited digital literacy, struggle to build the financial resilience necessary to manage daily life. We're focusing on helping workers understand their payslips better including how holiday pay, overtime payments and bonuses are calculated. We also want to help workers fully understand and access their social security benefits which can often be very challenging. **As of July 2023, we had five initiatives supporting access to social protection and financial education and services across 445 participating factories. These factories have 83,065 workers, representing 13% of workers in our finished goods supply chain²⁸.**

PAYSLIPS EDUCATION

Our *Sudokkho* programme in Bangladesh is an example of a programme we're implementing. Although primarily a technical skills programme, early on we recognised the importance of making sure that the factory trainers, often the first people to have prolonged contact with new workers, understood their workplace rights and could share this knowledge. One aspect of this is being able to understand a payslip. This need was confirmed through another social dialogue project with ETI where workers asked many questions around annual leave and wage calculations. This year, one of the *Sudokkho* trainers told our team that after six years working in the factory, he finally understood how to calculate overtime and annual leave following our training. He said he will now pass this knowledge onto others through formal worker training.

In 2021, we developed a training initiative on rights and responsibilities for workers entering the workforce for the first time. The programme, developed with international experts, included a module on understanding pay, social insurance deductions and how to read a payslip. The initiative was subsequently adapted to the local context by our country teams and in the last 12 months has been delivered to workers across two of our sourcing countries, Bangladesh and Turkey.

28. Data from our Global Sourcing Map up until 31 July 2023. It is updated annually and was last updated in November 2023: <https://globalsourcingmap.primark.com/>

HELPING WORKERS ACCESS SOCIAL PROTECTION

Another key component of financial resilience for workers is that they are able to access the social security benefits to which they are entitled. Awareness of these benefits can be low for a number of reasons, and understanding and being able to access them can also be a challenge. In India and China we have programmes to support workers in this area.

This year, we've partnered with *Haqdarshak*, a social enterprise that leverages technology to improve the ability of workers to access government welfare schemes in India. To design this partnership *Haqdarshak* assessed four factories in Bangalore, India to better understand the challenges that workers faced in understanding and accessing social security and the viability of workers using *Haqdarshak*'s digital solution. We're now moving the partnership forward to pilot providing direct support to workers in a number of factories in India.

We also continue to run our *Securing Futures* project in India. Our teams support workers to fully access their pension benefits through awareness raising and management training. As the project has evolved, participating factories have created groups of peer supporters to help workers and factory HR teams access their entitlements. The participating factories are also in the process of streamlining their systems to support this access.

“MANY WORKERS LIKE ME DON'T KNOW ABOUT THE BENEFITS OF THE EMPLOYEE PROVIDENT FUND (EPF), BUT THE SECURING FUTURES TRAINING CLEARLY EXPLAINED ABOUT ALL THE BENEFITS TO ME. NOW I UNDERSTAND THE LONG-TERM BENEFITS OF IT AND DECIDED TO CONTINUE MY EPF ACCOUNTS TO GET THE PENSION WHEN I REACH RETIREMENT AGE.”

FACTORY WORKER INVOLVED IN SECURING FUTURES, INDIA



CREATING FINANCIAL RESILIENCE

PROMISING FUTURE

In China, employers are legally required to enrol all employees onto social insurance to cover unemployment, medical issues, pension, maternity and occupational injury. Many workers who move jobs don't know how to transfer their social insurance accounts. Others don't understand the full benefits of the scheme.

Promising Future was created with our partner [Carnstone](#). It provides workers with bespoke and tailored content through WeChat to enable them to make more informed choices about their benefits. The project also has a website with information on the policy and process for each city and province.

Promising Future is now in its fifth year. As of July 2023, the programme is run in 437 factories. These factories have over 78,000 workers, representing 13% of total workers in our finished goods supply chain.²⁹ Following the programme, workers said they understood more about social insurance and its uptake also increased in factories following the programme. There has been a change in factory management attitudes and behaviours, with many encouraging workers to enrol in social insurance. We also identified some barriers for the programme to achieve a greater impact through our assessment, including workers' resistance to enrol in social insurance.

“I'D ONLY HEARD OF PENSION INSURANCE BEFORE. NOW I HAVE A DEEPER UNDERSTANDING OF ALL THE DIFFERENT SCHEMES AND BELIEVE IT'S A WORTHY INVESTMENT FOR MY FUTURE. I'VE JOINED THE SCHEMES WITH NO HESITATION.”

FEMALE FACTORY, WHO HAD BEEN AT THE FACTORY FOR FOUR YEARS, CHINA



29. Data from our Global Sourcing Map up until 31 July 2023. It is updated annually and was last updated in November 2023: <https://globalsourcingmap.primark.com/>

PROMOTING EQUAL OPPORTUNITIES FOR WOMEN

Social norms can lead to women being judged by the type of work they do, justify violence against them and invalidate their right to expect equal pay and respect at work. Tackling gender inequality is rooted in changing perceptions and attitudes; often held by both women and men, both within the workplace and the broader communities in which our supply chain operates. We've committed to strengthen the position of women in our supply chain through skills development and addressing their barriers to progression by 2030.

Addressing gender inequality in our supply chain requires engagement with women and men through training, knowledge sharing, dialogue and partnerships. Successful outcomes include women putting themselves forward for worker committees and being voted for by workers (including women). It includes management not discriminating against women when promoting staff and women choosing to apply for such opportunities. It also means workplaces that are free from gender-based violence and harassment (GBVH).

OUR APPROACH

Women can face multiple and interconnected barriers to progression and promotion in the workplace. We currently focus on three of these through our global programmes and partnerships:

- A lack of technical skills and an enabling environment to facilitate promotion opportunities;
- The prevalence of GBVH in the workplace; and
- The burden of unpaid care work that women generally face.

In recent years, we've been exploring the way that excessive unpaid care work can prevent career progression for women. Unpaid care work spans both the workplace and homelife. In late 2022, we started working with our long-standing international NGO partner Women Win, to understand more about how this barrier affects women in our supply chain. The analysis looked into potential ways we can adapt our existing programmes and partnerships to better recognise, reduce and redistribute unpaid care tasks more equally across the genders. For example, a programme that supports training on workplace rights and responsibilities could raise awareness of maternity rights and entitlements.

SKILLS DEVELOPMENT AMONG WOMEN FACTORY WORKERS

Women are often disadvantaged within the world of work by lack of access to quality training. This may mean they underachieve their full potential both in terms of technical ability and opportunities for progression. We offer a diverse range of skills training to support workers in our supply chain. The programmes target either technical skills such as sewing and supervisory skills, or soft skills like communications and problem solving. Improved skills can provide the foundation for workers to become less vulnerable and more empowered in the workplace, to take on greater leadership positions, assuming greater responsibility and earning more income. Our approach to skills development is focused on continuous improvement and designed to be worker-centric while also building visibility for factory managers to see the wider business benefits that can result from such training.

As of July 2023, we had three initiatives supporting skills development in our supply chain across 29 factories. These factories have 44,264 female workers, representing 14% of female workers in our finished goods supply chain.³¹



31. Data from our Global Sourcing Map up until 31 July 2023. It is updated annually and was last updated in November 2023: <https://globalsourcingmap.primark.com/>

PROMOTING EQUAL OPPORTUNITIES FOR WOMEN

OUR SKILLS DEVELOPMENT PROGRAMME SUDOKKHO

Sudokkho helps factories create effective technical training for sewing operators, most of whom are women.

Over the past year, Sudokkho has strengthened its focus on supervisor training to help demonstrate to factory management the importance of female representation in leadership. After receiving the training, all factories either promoted more female supervisors or committed to doing so. And one factory has already selected 10 more female workers to be trained in supervisory roles.

“AT FIRST, I THOUGHT I COULD NOT DO THE SUPERVISOR ROLE, BUT MANAGEMENT CHOSE ME FOR THIS ROLE. AFTER TRAINING I FEEL CONFIDENT IN CONTINUING MY RESPONSIBILITY LIKE OTHER MALE SUPERVISORS. NOW I FEEL THAT A SUPERVISORY ROLE IS NOT ONLY FOR MALES.”

FEMALE SUPERVISOR, BANGLADESH

As of July 2023, the Sudokkho skills development programme has been run in 17 factories. These factories have 29,224 female workers, representing 18% of the female workers in our Bangladesh finished goods supply chain.

In 2022, an independent impact assessment by 60 Decibels, a specialist impact measurement company, found that 80% of the workers interviewed said that the technical training they received under the project made them more productive or able to secure higher pay. The majority of respondents reported positive improvements against various indicators that gauged skills enhancement and other socioeconomic benefits.

More information on our Sudokkho programme can be found [here](#).



“I WANT AT LEAST 50% OF MY SUPERVISORS TO BE WOMEN. WHATEVER SUPPORT IS REQUIRED FOR THE SAME, I SHALL ENSURE IT IS PROVIDED. I AM HOPING BY LOOKING AT THESE FIRST TEN SUPERVISORS MORE OPERATORS WOULD LIKE TO TAKE UP THE SUPERVISORY JOB RESPONSIBILITIES.”

FACTORY EXECUTIVE DIRECTOR, BANGLADESH

PROMOTING EQUAL OPPORTUNITIES FOR WOMEN

TACKLING GENDER-BASED VIOLENCE AND HARASSMENT IN OUR SUPPLY CHAIN

OUR APPROACH

It is well documented that gender-based violence and harassment (GBVH) is prevalent in many parts of the global garment industry. We continue to build and strengthen our approach to tackle this complex and serious issue, now embodied in ILO Convention C190: Violence and Harassment in the World of Work. We understand that causes of GBVH are complex and deeply embedded. Successfully tackling this issue requires partnerships with technical experts on the ground and a systems approach to tackle the many root causes of this issue. These include inappropriate behaviour and attitudes; limited understanding of what constitutes harassment; lack of senior-level commitment to address the issue; and inadequate workplace mechanisms through which workers can safely and effectively raise grievances related to GBVH. **As of July 2023, we have five initiatives supporting efforts to address GBVH across 45 participating factories. These factories have 45,040 workers, representing 7% of workers in our finished goods supply chain.**³²

In June 2023, we partnered with the International Center for Research on Women (ICRW) to study male management attitudes towards gender equality within four factories in India. The aim of this research is to identify cultural beliefs that underlie dominant attitudes to gender inequality to help us better frame and engage men in the workplace. Research in the four factories is underway with findings and recommendations for programming due by the end of the year.

RAISING AWARENESS OF GBVH IN VIETNAM

Over the last year, we've also continued to support our three-year partnership with the International Finance Cooperation (IFC) to prevent and address GBVH through engagement with four suppliers in Vietnam. As a first step, the IFC undertook an assessment of the factories and found they lacked policies and

processes in this area but also highlighted the prevalence of certain attitudes as a key driver of GBVH, for example, that victim blaming is particularly common. This speaks to the importance of supporting attitude and behaviour change as part of the solution to drive a zero tolerance to workplace GBVH. This form of support is the foundation of our Drama for Change programme which runs in parallel to our IFC programme and uses live participatory theatre performances to engage workers and management on attitudes towards GBVH.

Since completion of the assessment, we've launched training in 13 factories and their four suppliers. This is supported by the provision of individual coaching based on the specific needs of the factory or supplier. Once this training is completed early next year, IFC will report on the impact of their support and recommend a methodology and tools to scale up the programme in other regions.

COLLABORATING ON GBVH IN CAMBODIA

This year, we completed our **Cambodia STOP programme** in partnership with NGO Care International. Over the last year, **86% of all factory workers across five factories** received training on sexual harassment and took part in awareness-raising activities such as International Women's Day events. By the end of the programme, a sample of 26 female workers from the five factories could name at least two forms of sexual harassment behaviours – at the beginning, they could name none.

Male workers have also engaged in the programme, with one worker saying;

“I BELIEVE IT IS ALSO IMPORTANT THAT MEN KNOW ABOUT SEXUAL HARASSMENT AND HAVE TRAINING ON THESE ISSUES.”

MALE FACTORY WORKER, CAMBODIA

Along with the five factories, STOP also engaged key government stakeholders in Cambodia including the Ministry of Labour and Vocational Training, Ministry of Women's Affairs, Ministry of Interior and Ministry of Justice, in addition to other brands, trade unions and Better Factories Cambodia (BFC). There was collective agreement that GBVH is still a major concern in Cambodia. Our team in Cambodia is currently looking at how to support and build on the momentum created by the impact of this project.



32. Data from our Global Sourcing Map up until 31 July 2023. It is updated annually and was last updated in November 2023: <https://globalsourcingmap.primark.com/>

PROMOTING EQUAL OPPORTUNITIES FOR WOMEN

SUPPORTING WORKERS THROUGH EFFECTIVE GRIEVANCE MECHANISMS

Effective grievance mechanisms give workers a way to successfully and safely raise and resolve any problems that they're experiencing at work. They're a fundamental part of workers' rights, which is why they are part of our Supplier Code of Conduct requirements. We've committed to making effective and accessible grievance mechanisms available to all of our colleagues and people in our supply chain. This includes:

- Having grievance mechanisms which allow for anonymous reporting;
- Expecting all Primark-approved factories to have their own grievance mechanisms available to their workers;
- Working with third parties, including NGOs, to implement industry-wide grievance mechanisms in our sourcing countries and support existing ones; and
- Developing a separate, widely available, Primark-funded grievance mechanism that will be accessible to all workers and relevant stakeholders in our supply chain.

In addition to the mechanisms listed above, we also receive grievances through other channels, such as the customer services section of our website and the confidential worker interviews that take place as part of our social audits, in addition to direct contact with Primark colleagues on the ground.

As of July 2023, we have six initiatives supporting the development of effective grievance mechanisms across 91 participating factories. These factories have 187,657 workers, representing 30% of workers across our finished goods supply chain.³³

When issues or grievances are raised through any of the channels, 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 a grievance and any affected stakeholders. We work with specialist organisations and civil society on the investigation and remediation of grievances, enabling us to draw on specific technical expertise and support when needed. We track,

33. Data from our Global Sourcing Map up until 31 July 2023. It is updated annually and was last updated in November 2023: <https://globalsourcingmap.primark.com/>

monitor and report on the key performance indicators related to grievances.

EFFECTIVE WORKER DIALOGUE MECHANISMS

We continue to encourage effective worker dialogue mechanisms through our social impact programmes. **As of July 2023, we have three initiatives supporting worker representation through democratically elected bodies across 24 participating factories. These factories have 34,602 female workers representing 11% of female workers in our finished goods supply chain.**³³

More details on both areas can be found in our [Modern Slavery Statement](#).

THE AMADER KOTHA GRIEVANCE HOTLINE IN BANGLADESH

In Bangladesh, we support the well-established [Amader Kotha](#) hotline and in July this year, we set an ambitious goal to scale access to this hotline to all the factories in our Bangladesh supply chain by the end of 2024. This independent, industry-wide grievance mechanism is not only helping to protect workers' rights, but also build stronger worker-employer relationships. An example of this impact is described by a factory manager in one of the participating factories as follows: "We have around 11,200 workers, almost every month receiving grievances and issues being solved as well. Initially we were not comfortable with this external channel but now realised this is benefiting us. Through resolving issues, we are gaining workers' trust."

We've also joined Amader Kotha's [Safer Together](#) initiative being run by Columbia Business School to explore how to encourage the use of the hotline by vulnerable workers who may be nervous about their identity being revealed through providing the specific details of their case to the hotline. Safer Together is piloting an approach whereby workers lodge their complaint with the hotline on the condition that it will only be escalated to the factory if others also log similar complaints, therefore helping to protect their identity in the face of an investigation by the factory. Results are due in the coming months, and we plan to use these learnings across the other support to grievance mechanisms that we support.

This year we also began supporting [Elevate](#), the international partner behind Amader Kotha, to establish two new similar mechanisms in Pakistan and India.

HELPING TO BUILD MORE EFFECTIVE INTERNAL GRIEVANCE MECHANISMS IN FACTORIES

In 2021, Primark and four other brands nominated three factories in Pakistan to join a programme run by [Fairtrade Germany](#), with support from [GIZ Pakistan](#). The project aimed to improve internal complaints mechanisms and solve incidents more effectively. It ended this year, giving us insightful learnings that will help shape our future grievance initiatives. For example, research under the project highlighted that many workers are unaware of the law surrounding grievance mechanisms, but they do value these processes. The findings also indicated that low literacy levels of workers hampers the roll-out of education of regarding these programmes; and that refresher training is key to successfully engaging participants.

An impact evaluation of this project found that over 90% of workers said they were satisfied or very satisfied with the new mechanisms set up through the project. We are currently talking to GIZ about possible next steps for this project.

We continue to support the worker hotline in Turkey run by local NGO [MUDEM](#) and have also committed to scaling up the number of our supplier factories that engage with this hotline this year.

More details on the grievance mechanisms programmes we are supporting can be found in our Modern Slavery Statement [here](#).

Over 90%
of workers said they were satisfied or very satisfied with the new mechanisms set up through the project



IMPROVING HEALTH AND WELLBEING

The health and safety of our workers is an important element of our [Supplier Code of Conduct](#). Primark’s health and safety programmes support systemic change within our supply chain to raise and maintain standards. Beyond health and safety workplace compliance, there is much we can do to facilitate workers’ access to much needed health-related information and services. These are often lacking among vulnerable workers, particularly women. For example, both women and men among many worker populations have a poor understanding of menstrual health and hygiene.

Through Primark Cares, we’ve committed to widen access to help for mental and physical wellbeing in our supply chain. In many of the communities across our supply chain, mental health and wellbeing remain associated with negative social stigmas, particularly for women, making it challenging for people to speak up. We take a systemic approach to mental health, creating systems and enabling workers and managers to build trust and create support systems within the factory, creating a better working environment and reducing stress. We have seen that the trust and dialogue built through these initiatives can help push forward progress towards more formal workplace worker-management dialogue and collaboration.

As of July 2023, we have 7 initiatives supporting improvements to workers physical and mental health and wellbeing across 118 participating factories. These factories represent 16% of workers in our finished goods supply chain.

CREATING SPACE FOR MENTAL HEALTH IN FACTORIES THROUGH OUR MY SPACE PROGRAMME

Our experience to date has demonstrated that workplaces can play a valuable role in opening discussions around mental wellbeing to help remove stigmas and support improved wellbeing of workers and managers alike.

Our [My Space](#) programme in India, in partnership with St John’s Medical College, Bangalore, is an example of the way that we can drive behavioural change and extend support for mental health to workers. Already operational in 12 factories, this project

builds trust between and among workers and management and facilitates open conversations about mental wellbeing. The programme trains carefully selected staff to become lay counsellors and engage colleagues to support their peers.

“I COULD FEEL THE CHANGES IN MY FACTORY WORKPLACE BEFORE AND AFTER MY SPACE. IT WAS A REMARKABLE CHANGE WHICH THE COUNSELLING SERVICE HAD BROUGHT IN. THE SAME PEACEFUL WORKPLACE HAS TO BE SET IN ALL MY FACTORIES. SO I DECIDED TO PAY TO IMPLEMENT THE MY SPACE PROJECT FOR MY NON-PRIMARK FACTORIES.”

MANAGEMENT EMPLOYEE AT A FACTORY

Speak Up, India launched in February 2023 in response to observations and learnings from the My Space programme. As trust and dialogue with workers strengthened through the My Space programme, the need for a separate intervention on GBVH became apparent. The team developed the Speak Up programme alongside St John’s Medical College who are pivotal to both the technical content of the programme as well as developing and maintaining a safe space for both workers and management on this sensitive issue.

“AS I WORK IN HR, MANY PEOPLE COME TO ME WITH PROBLEMS. I HAVE TO TAKE CARE OF MY MENTAL HEALTH. SIMILARLY, EVERY WORKER HAS THEIR OWN LEVEL OF MENTAL HEALTH AND STRESS. WITH MY SPACE, WORKERS FEEL THAT THERE ARE PEOPLE TO LISTEN. SLOWLY THEY’RE REALIZING INSTEAD OF KEEPING EVERYTHING INSIDE, IT’S BETTER TO TALK TO SOMEONE.”

MANAGEMENT EMPLOYEE AT A FACTORY



IMPROVING HEALTH AND WELLBEING



GROWING MENTAL HEALTH PROGRAMMES ACROSS OUR SUPPLY CHAIN THROUGH MONER KOTHA

In partnership with the [British Asian Trust](#) and [Sajida Foundation](#), we're supporting a programme to improve mental health awareness in five factories in Bangladesh. The programme uses learnings from the My Space project in India, which was set up in 2017 and implemented in partnership with St John's Medical College, to provide practical support to workers' mental health, including raising awareness of, and reducing the stigma around addressing mental health issues in the workplace. The Moner Kotha ('mind talk' in Bengali) project, launched in late 2022, aims to increase awareness of mental health issues, build resilience, educate on self-coping mechanisms, and provide support for workers in the supply chain through training, capacity building, awareness-raising, and the provision of mental health information in the workplace.

In January 2023, the programme held awareness-raising sessions for 52 senior managers from participating factory sites. This was organised and facilitated by the Sajida Foundation with sessions covering issues such as understanding mental health, self-care and mental health services.

We're currently rolling out the programme across factories in our Bangladesh supply chain and are on track with our goal to run awareness sessions with 2,500 workers across five sites in Bangladesh by the end of 2024. Feedback from the initial participants was positive and the ground-breaking nature of the programme was noted and welcomed. As one participant reflected:

“TO THE BEST OF MY KNOWLEDGE I DID NOT HEAR THAT ANY OTHER FACTORY HAS IMPLEMENTED A MENTAL HEALTH PROJECT IN THE PAST. IF WE IMPLEMENT THIS PROJECT IN OUR FACTORY, WE’LL BE ONE OF THE FIRST FACTORIES IN THIS ACHIEVEMENT.”

FACTORY WORKER, BANGLADESH

To encourage others to support the initiative, the project hosted a roundtable with relevant stakeholders in Bangladesh this year, including Government representation and other brands. This event aimed to raise awareness and demonstrate the benefits of mental health support systems for women and low-income populations across industry and stakeholders.

IMPROVING HEALTH AND WELLBEING

DEEPENING OUR UNDERSTANDING OF THE ISSUES FACING WORKERS IN OUR SUPPLY CHAIN

To support our understanding of the challenges and vulnerabilities that workers face, in addition to how we can best help address them, we're working with a number of external experts. Over the last 12 months, we've commissioned and funded research into workplace GBVH in Vietnam with the [International Financial Cooperation \(IFC\)](#); factory workers' access to and understanding of financial services in Vietnam with [IDEO.org](#); and workers' access to and understanding of their social security entitlements in India with Haqdarshak. This research provides us with a unique understanding of some of the most prevalent issues facing workers in our supply chain.

UNDERSTANDING THE EFFECTIVENESS OF OUR PROGRAMMES

This year, we also worked with a PhD researcher, from the [University of Leicester School of Business](#), to help us better understand the learning processes involved in one of our projects in China, EHS NOW!, that supports workers and management to better address health and safety issues in factories. Part of this research looked at the role and capability of those trained by experts to pass on knowledge to others (the Train the Trainer model). The Primark team on the ground in China is working closely with the researcher to act upon her recommendations. A webinar has been delivered to the ETES team to share findings from the research and recommendations for wider implementation. The researcher is also providing ongoing feedback on the design and application of the project.

We use the Train the Trainer model in a number of our social impact programmes. This enables the selection and training of a factory's own trainers and assessors to pass on their knowledge and run the training within their own factory. This way, the factory gets to develop its own better-skilled and motivated workforce. Given the importance of the Train the Trainer model in delivering our social impact programmes, this year we funded and commissioned research to further deep dive into how these models work best. These learnings were shared with the rest of the industry through our partner [Business Fights Poverty](#).

Measuring the impact of our work can be challenging but we're committed to being guided by data and evidence to help us understand what works and what we may need to evolve. Over the past year, we've been developing a social impact measurement framework in partnership with [Tandem](#), a specialist social impact measurement organisation. This framework will strengthen our measurement and evaluation approach, enabling us to better understand, and therefore learn from, the effectiveness of initiatives that support worker welfare.

To date, we've commissioned independent impact assessments with our partner [60 Decibels](#) for two of our initiatives: [Sudokkho](#), a technical skills project that supports factory workers in Bangladesh, and My Life India, a life skills project that supports vulnerable workers in India. We have received findings for Sudokkho and are expecting the My Life India assessment by early 2024.

UPSKILLING OUR COLLEAGUES

We're committed to supporting and building the capacity of our colleagues so they better understand and can help support the delivery of these programmes. Almost **50,000** colleagues have participated in training on a range of topics including Worker Skills Development, Grievance Mechanisms, Training Effectiveness and specific training on Primark's Audit Requirements in line with our Supplier Code of Conduct. **5,725** hours of training have been delivered in total, with **1,402** hours delivered by internal colleagues and over **4,323** hours delivered by external experts and partners. Training is delivered in a range of methods, tailored to the topic and learners needs, including face-to-face, online, play-based learning or using the Train the Trainer model.



RANA PLAZA: 10 YEARS ON

The Rana Plaza building collapsed in Bangladesh in 2013. As one of the first brands to state that one of our suppliers was using one of five garment factories located in the Rana Plaza building, we pledged short and long-term support to those affected. In the run up to the tragedy, workers had expressed concern about the safety of the building. The tragedy was catalyst for change across the industry, in particular helping to drive improvements in building safety and increasing mechanisms for workers to raise concerns.

SUPPORT FOR THOSE IMPACTED BY RANA PLAZA

Working with local partners, our team on the ground provided emergency food aid for over 1,265 households immediately after the tragedy. We gave short-term financial aid for 3,621 workers and/or their families, the equivalent of nine months' salary, whether or not they worked at the factory of our supplier, and developed a long-term compensation programme for the workers at our supplier's factory or their dependants, providing both financial educational and non-financial support. This was developed by working with local partners, including the University of Dhaka, and in consultation with the ILO and totalled over \$14m. We also contributed £1m to the ILO's Rana Plaza Donor Trust Fund.

Today, some of the most vulnerable beneficiaries continue to receive non-financial support through our Pashe Achi programme (meaning 'by your side'), a collaboration with the University of Dhaka and other experts. 142 beneficiaries are supported through this programme today. The programme aims to build the confidence and knowledge of those impacted by the tragedy, so that they can manage their financial compensation. They are also given advice on how to access health services and legal support through regular contact and a 24-hour helpline.

LONG-TERM CHANGE

STRUCTURAL SAFETY

The Rana Plaza tragedy highlighted to the whole industry the necessity of monitoring the safety of factory buildings to protect the safety of garment workers in the country. As well as immediate relief, we were determined to do what we could to

drive systemic change. In 2013, Primark became one of the first signatories of the [Accord on Fire and Building Safety in Bangladesh](#), a legally binding agreement with the aim of promoting safe workplaces for garment workers. Since then, the Accord has become the International Accord and, today is focused on taking the lessons learnt from Bangladesh further afield. We were happy to sign up to support the International Accord's extension into Pakistan this year.

In May 2013, we also established our own building safety programme (known as our Structural Integrity Programme) in Bangladesh to assess the safety of all supplier factories against international standards. This continues to be central to our monitoring, and approval, of suppliers' factories in the countries where its run.

If areas are found to require improvement, we work with the suppliers and their factories – in collaboration with a team of structural and civil engineers from international engineering firms – to provide technical support and guidance. Our Structural Integrity Programme expanded to Pakistan in 2015 and Cambodia in 2019 and we also provide ad hoc support as required in other sourcing countries.

GRIEVANCE MECHANISMS AND WORKER DIALOGUE

This tragedy also highlighted a number of other areas to address, including improving mechanisms for workers to raise concerns in the workplace through effective grievance mechanisms or workplace committees. You can read more about a helpline born from the legacy of Rana Plaza, Amader Kotha, and its partnership with Primark earlier in the report [here](#).

SOCIAL PROTECTION FOR WORKERS

The tragedy highlighted the need to make social protection schemes available to workers should something go wrong while at work. Alongside other brands, Primark is supporting a pilot [Employment Injury Scheme](#) for workers in partnership with the ILO and the Bangladesh Government. The scheme, which launched in 2022, will compensate injured workers and dependants in case of accidents which lead to permanent disability or death in line with the requirements of ILO Employment Injury Protection Convention.



IMPROVING PEOPLE'S LIVES

MY LIFE, INDIA

BUILDING LIFE SKILLS AMONG VULNERABLE WORKERS

There are 600 million internal migrants in India³⁴ who typically move great distances across the country in search of seasonal or temporary work. Many of our supplier factories are concentrated in areas that poorer and less-educated people move to for work. As a result, migrant workers can be some of the most vulnerable in our supply chain.

In 2017, in partnership with the international NGO Women Win and Naz Foundation, we launched My Life to build life skills among vulnerable workers in India, with a focus on hostel residents and women. The programme supports factories to train vulnerable workers on basic life skills including health and safety in the workplace, rights and responsibilities, communication, and teamwork. The training is delivered through a 'play-based' approach, which uses interactive activities such as games to help workers engage and learn.

After disruption to the programme during COVID-19, My Life is now back up and running. As of July 2023, My Life India has helped vulnerable workers understand more about their rights in seven factories, representing over 4,000 workers. The programme is now delivered in four languages: Tamil, Hindi, Bengali and Oriya. Trainers have also introduced migrant workers to Google's 'Text to Speech' feature so they can listen to and understand contracts that aren't written in their native language. The training also covers improving participants' understanding of employment documents and wage slips.

Together with social impact assessments experts 60 Decibels, this year, we conducted an independent impact assessment of My Life. In group discussions, workers said they had more understanding of their rights and entitlements in the workplace, better knowledge of personal hygiene, and stronger communication with management.

“I WAS VERY HAPPY THAT THE TRAINING WAS DELIVERED IN ORIYA. I UNDERSTOOD THAT WHEN I COME TO A NEW PLACE I SHOULD NOT ISOLATE MYSELF, INSTEAD I SHOULD MAKE EFFORTS TO ESTABLISH RELATIONSHIPS WITH MY CO-WORKERS. I ALSO UNDERSTOOD THE IMPORTANCE OF OCCUPATIONAL HEALTH AND SAFETY AND THE ROLE OF COMMUNICATION IN PERSONAL AND PROFESSIONAL LIFE. I ALSO LEARNT THAT I NEED TO READ, UNDERSTAND AND MAINTAIN COPIES OF MY WORK-RELATED DOCUMENTS SUCH AS THE APPOINTMENT ORDER.”

FEMALE MILL MIGRANT WORKER

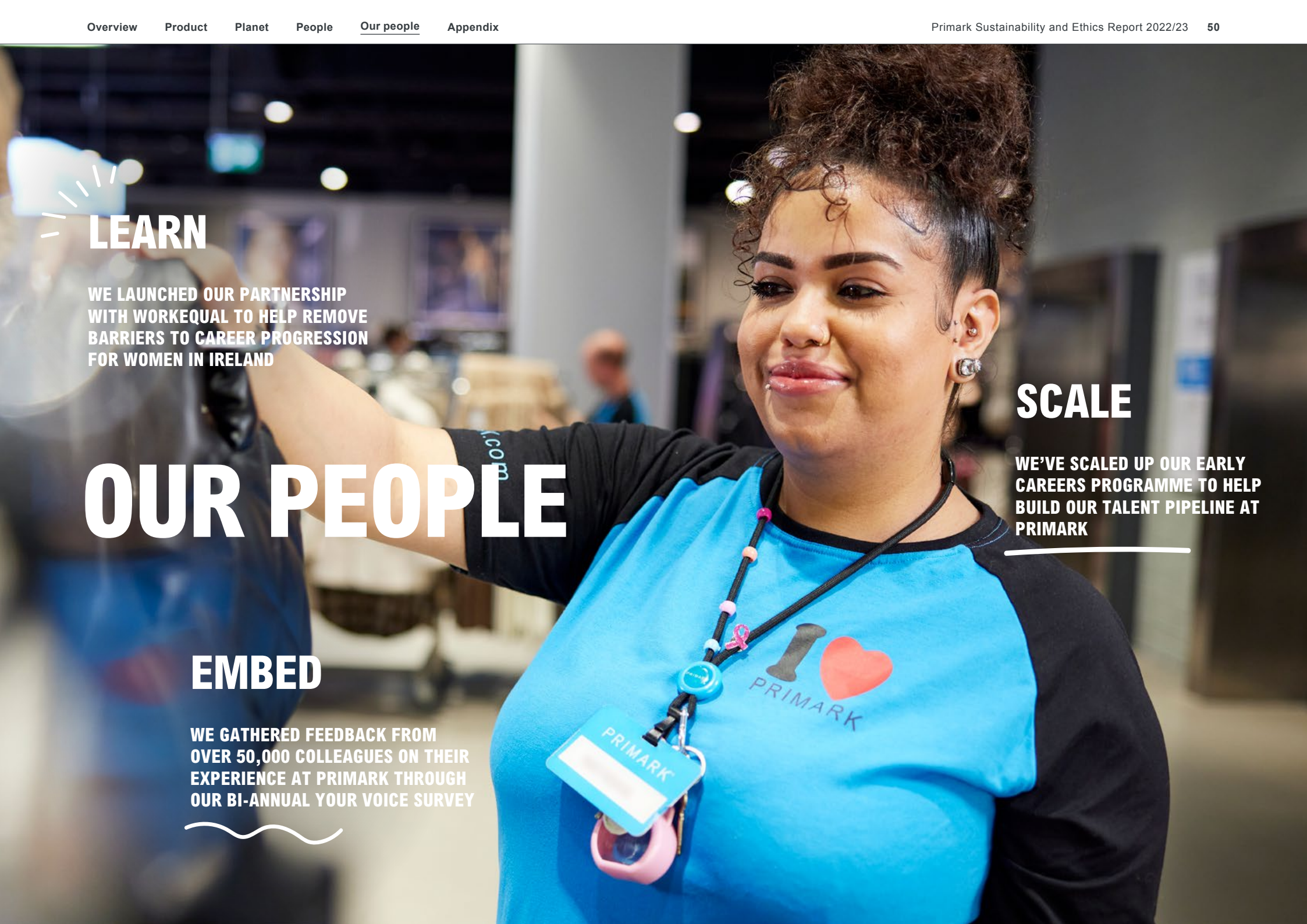
As part of the study, 60 Decibels conducted phone-based interviews with **500 factory workers** who have completed the My Life training across **eight factories** in Tamil Nadu, India. While research is ongoing, the preliminary findings found:

- **Almost all factory workers** report accessing training like My Life for the first time and appreciate the play-based approach of the training. Roughly two thirds of workers report that they find all the training to be useful in their personal life. They found the training sessions on communication, personal hygiene and menstruation to be most useful.
- **Three in five workers** report significant improvements in their communication skills because of the My Life training. They report feeling more confident while speaking with their supervisors, being able to manage their emotions better and communicate calmly, and feeling more comfortable seeking help from colleagues.

- **Three in five workers** also report experiencing significant improvements in their personal and menstrual health and hygiene because of the My Life training. They report developing clean hygiene-related habits and a better diet and nutrition as the top improvements.
- **Two thirds of workers** 'strongly agree' that they have a better understanding of their rights and responsibilities at work after the My Life training. This aligns well with most workers reporting that they have a written contract of employment with the factory and access to mechanisms that can help them in representing issues at work. This is encouraging and paves the way forward for the My Life training to potentially focus more on aspirational themes that can help factory workers continue to thrive in their roles.
- When asked about new themes that they would like future My Life trainings to cover, workers primarily say they want to learn more about career progression and financial literacy. Other reported topics include stress management, tackling domestic violence in their homes, and nutrition.



34. National Library of Medicine excerpt from India's internal migrants and the first wave of COVID-19: The invisibility of female migrants.



LEARN

WE LAUNCHED OUR PARTNERSHIP WITH WORKEQUAL TO HELP REMOVE BARRIERS TO CAREER PROGRESSION FOR WOMEN IN IRELAND

OUR PEOPLE

EMBED

WE GATHERED FEEDBACK FROM OVER 50,000 COLLEAGUES ON THEIR EXPERIENCE AT PRIMARK THROUGH OUR BI-ANNUAL YOUR VOICE SURVEY

SCALE

WE'VE SCALED UP OUR EARLY CAREERS PROGRAMME TO HELP BUILD OUR TALENT PIPELINE AT PRIMARK

PROMOTING WELLBEING AND INCLUSION FOR OUR COLLEAGUES

As an international business, our customers and colleagues come from a wide range of backgrounds. As such we see DEI as not only part of our culture but key to our continued success. We have over 76,000 colleagues made up over 180 nationalities, and includes colleagues ranging from age 16 to over 65 years of age. Of our senior roles, 48% are filled by women, helping to create workplaces that are ambitious, engaging and inclusive.

NURTURING TALENT AND SUPPORTING CAREERS

It's important to us that everyone is rewarded and supported to perform at their best. Learning and development is a priority for us. Retail colleagues stay with Primark for an average of four years, and office colleagues stay an average of five years. We awarded 2,657 promotions across all areas of the business this year, and we're proud that people are encouraged to progress with us.

This year, we enhanced our Welcome Experience to ensure new retail colleagues have a well-rounded onboarding across all the markets we operate in. It gives us the opportunity to share our Primark Cares commitments and ethos with colleagues as soon as they join our business, embedding sustainability and ethics from the outset.

In July 2022, as part of our Early Careers programme, we welcomed 46 students to Primark for their year-long university placements. The students joined us in seven different business streams – Buying, Merchandising, Design, Quality, Technology, People & Culture and Brand.

The Early Careers programme provides us with an amazing opportunity to attract and retain people to enable continued growth and innovation. Given how competitive the talent landscape is, this programme is especially important to create a talent pipeline for Primark. We subsidise the accommodation of the students and provide relocation expenses to give them the best start on their placement year in Primark.

This year has marked a great start to our Early Careers offering, and our students have had the opportunity to gain hands-on exposure whilst making a real impact in their teams. In addition to hands-on experience they completed a series of workshops covering topics such as presentation skills, diversity and inclusion, and developmental insights. In January, they started their Forward Think Early Careers group projects where they were given a business-related topic to research and make a proposal for solving, which they presented back to business leaders in April. For example, one of these proposals focused on durability of clothing and giving clothes a longer life.

Following very positive feedback from line managers and students, we've offered 40 of the students a role at Primark following completion of their degrees.

“Primark Cares and its vastness really surprised me when I joined the business. The strategy is well developed and thorough. It is amazing to see the reality of the company’s responsible business practice and the way in which Primark is constantly working to be even better.”



**GRACE WALHEE,
BUYING PLACEMENT STUDENT**

During Autumn 2022, we launched our talent attraction campaign for our second cohort. We updated the campaign's creative outputs, ran a number of targeted university talks and shared numerous pieces of student-generated content on our social channels. We're pleased to have received 2,100 applications for the 2023/24 programme, a 62% increase in eligible applications compared to last year, and we welcomed 48 students in July 2023.

COLLEAGUE HEALTH, SAFETY AND WELLBEING

Taking care of our people is not just something we aim for, it's a core part of our ongoing success. This commitment is cemented by our health and safety strategy, Safe Today, Safe Tomorrow, where we set out our vision and the high standards of our business.

We set both central and global KPI targets and objectives annually to drive continuous improvement in our health and safety performance. Setting improvement targets around injury and accident reporting, in addition to Environment, Health and Safety (EHS) audit results helps us continually raise awareness of our health and safety performance in all business areas. Our work in this area will be supported by the recent roll-out of a new dedicated EHS and Operations Lead in stores across 10 markets.

Our teams in each country where we operate proactively plan various events and meetings to help influence our wellbeing improvement targets. We're continuing to grow our colleague wellbeing programme, Spark, which was created to empower colleagues to become their best selves in work and in life. The programme focuses on the three pillars of Mind, Body and Life. We're working to establish a governance structure that includes having a Wellbeing Champion in all stores globally to support our local wellbeing agenda.

In the meantime, we have a rolling calendar of UK and Republic of Ireland initiatives and activities, from fitness sessions to support during a colleague's experience of fertility, paternity and menopause. We've also reached our target to have 5% of our office colleagues trained as Mental Health First Responders, which equips them with the tools to provide mental health first aid to other colleagues in crisis situations.

PROMOTING WELLBEING AND INCLUSION FOR OUR COLLEAGUES

CHAMPIONING DIVERSITY AND INCLUSION

We see diversity and inclusion as part of our culture and key to our continued success. We know how important it is to create an environment where everyone feels included, empowered and able to be their authentic selves every day.

As a diverse organisation, we work hard to ensure everyone feels represented in what we do and how we do it. We listen to our colleagues through our bi-annual engagement survey, Your Voice, where we ask questions directly related to inclusion. Our colleagues tell us they understand and feel that diversity and inclusion is a priority in our business, and so it's important to us that we work together to create an inclusive culture and environment for everyone.

A LEADERSHIP APPROACH TO DIVERSITY AND INCLUSION

Everyone plays a part in embedding inclusivity across Primark and we want our leaders to set the example when it comes to inclusive behaviours. Our Head of Diversity and Inclusion and relevant Business Partners work across multiple markets, building on existing foundations to deliver our strategy in this space, supported by our sponsors and colleague networks.

Earlier this year, we ran an Inclusive Leader Workshop with a number of senior leaders in the business. The sessions focused on: diversity; identity; the importance of authenticity and actions that inclusive leaders can take to engage colleagues and improve culture.

We want our colleagues to have a say in how we shape our culture. And our four global colleague networks continue to give people a place to share their lived experience. These networks are LGBTQIA+, Cultural Diversity, Life Stages and Gender, and Disability and Neurodiversity.

PRIDE 2023

One example of the impact of our networks can be seen through this year's Pride campaign. Through products, imagery and internal activations we celebrated 'Found Family'; the family you find, and the family who finds you. As part of this, we launched an inclusive, gender-neutral clothing range for adults and kids, where elements were sold across 16^A markets. Members of our LGBTQIA+ network shared feedback which influenced changes to product design, and they also provided guidance which improved in-store placement of the products. Beyond this, the network influenced the introduction of non-workwear days in celebration of Pride, across all markets, and participated in Pride marches.

2023 marked the fifth year that we collaborated with the International Lesbian, Gay, Bisexual, Trans and Intersex Association ([ILGA World](#)). We donated £150,000 to support ILGA World in its efforts to advance equity and inclusion for LGBTQI+ people everywhere. Over the last five years, we've donated £620,000³⁵ to the organisation.



LISTENING TO OUR COLLEAGUES

In 2021, we began working with Peakon Employee Voice to help us connect with our colleagues across our markets to get their feedback on their experience at Primark. Your Voice is our global colleague engagement survey and it provides us with invaluable insights from our people. We use the results from the survey, and the insights from our colleagues, to inform decision making on life at Primark.

Our colleagues understand the value of sharing their thoughts, opinions and ideas and they see how their ideas come to life through the new initiatives we have launched as a result of the survey. These include new company values and behaviours, our wellbeing initiatives, in addition to recognition and reward programmes.

Our first Your Voice survey launched in September 2021. At that time, 50% of our colleagues chose to participate and they submitted over 300,000 comments on life at Primark. We now survey bi-annually and have completed four surveys so far. Engagement with the survey has continued to grow since and, in the most recent survey from September 2023 there was **73%** participation, meaning over **50,000 colleagues** took part. To date, Your Voice has generated **158,785 responses** and our colleagues have shared an incredible **1,269,000 comments**.

The results from each survey are shared with Managers at every level of the business, via a personalised results dashboard for their team. Managers work with their teams to decide how they can make changes that will have a positive impact and improve engagement within their team.

We also have leaders who look at the results from a global perspective and ensure that the key topics are addressed within our programmes and activities.

35. Total donation to date as at 1 November 2023.

OUR PEOPLE

OUR CHARITY PARTNERSHIPS

As a high street retailer, our local communities are the lifeblood of our business. We aim to make a positive difference in the areas where we live and work as part of our responsibility to give back to our colleagues and customers. We also support and partner with charities and intergovernmental organisations to help deliver on this commitment. This includes our global partner UNICEF.

REMOVING BARRIERS TO WORK AND CREATING FINANCIAL INDEPENDENCE THROUGH WORKEQUAL

Financial independence for everyone is a critical part of creating a more equal world. But many people feel at a disadvantage when entering the workforce. Historical gender imbalances continue to unintentionally exclude individuals from some fields of work. For many people, caring responsibilities mean they need to ask for flexible working patterns. Others may be entering the workforce for the first time or returning to work after a long period away, making it challenging to know expectations and apply for jobs successfully.

WorkEqual is helping to remove barriers to career progression for women in Ireland. It provides styling, mentoring, workshops and career consulting services free of charge to support those who want to (re)enter the workforce. In September 2023, we announced a new three-year partnership with WorkEqual, with a commitment to provide €300,000 to help deliver its services nationally, bringing its coaching, career development and styling services into communities across Ireland.

We announced a new three-year partnership with WorkEqual, with a commitment to provide

€300,000

to help deliver its services nationally

36. Figures are as per UNICEF Annual Progress Report 2022-2023.

37. UNICEF does not endorse any brand, company or service.



This year, we hosted the first of a series of workshops at our Dublin Head Office. Colleagues from Primark and WorkEqual ran sessions on image consulting, interviews, job applications and building a social media profile – four areas that are crucial for building confidence when starting or restarting work.

Over the coming years, we'll be hosting more confidence workshops and impact hubs with WorkEqual. Working together, we hope to connect more people in Ireland to WorkEqual's services.

SUPPORTING CHILDREN'S EDUCATION THROUGH UNICEF

Since 2018, we've supported UNICEF's programmes to help provide better education for children in Cambodia, Sri Lanka and India. We have donated \$12m to this work for children over the last five years.

In India³⁶, our support has helped UNICEF to:

- Identify 772,132 out-of-school children and put them into mainstream formal education;
- Set up attendance campaigns in 10,000 schools with the help of volunteers;
- Provide home-based education to 1,152 children with severe and multiple disabilities; and
- Give 6,561 children flexible learning opportunities.

In Sri Lanka³⁶, UNICEF has trained **2,540 teachers**, **5,440 parents** and **24,361 students** on the concept of positive disciplining, enabling children to learn in safe environments.

Following the devastating earthquakes in Turkey and Syria earlier this year, we also donated £200,000 to UNICEF's emergency response on the ground. We made the donation together with our parent company ABF. In Syria, UNICEF provided medical supplies, access to safe drinking water and sanitation, and helped protect children and their education services. In Turkey, it focused on working with the Government on its search and rescue missions. We're proud to support our longstanding partner, UNICEF³⁷, on its wider humanitarian work.

“THIS PARTNERSHIP WITH PENNEYS TRANSFORMS OUR ABILITY TO DELIVER ON OUR MISSION ACROSS THE ISLAND OF IRELAND. WE'RE EXCITED TO SEE HOW WE GROW TOGETHER TO HELP BUILD CONFIDENCE AND JOB READINESS AMONG WOMEN. HELPING THOSE WHO NEED IT MOST TO SECURE MORE SUSTAINABLE EMPLOYMENT IS SOMETHING WE CAN NOW DO AT SCALE.”

SONYA LENNON, FOUNDER, WORKEQUAL

INDEPENDENT ASSURANCE STATEMENT TO PRIMARK LIMITED

SCOPE

We have been engaged by Primark Limited (“Primark”) to perform a ‘limited assurance engagement,’ as defined by International Standards on Assurance Engagements, here after referred to as the engagement, to report on Primark’s presentation of selected performance data (listed below in Table 1), and statements (together the “Subject Matter”) contained in Primark’s Sustainability and Ethics Progress Report 2022/2023 for the year ended 31st July 2023 (referred to as “the Report”).

The Subject Matter includes the following selected performance data, which are also marked with a Δ symbol in the Report:

TABLE 1: LIST OF SELECTED PERFORMANCE DATA

Pillar	KPI Name
Product	<ul style="list-style-type: none"> Percentage of Primark’s clothes containing cotton that is organic, recycled or sourced from the Primark Sustainable Cotton Programme (“PSCP”) Percentage of Primark’s clothing unit sales containing recycled or more sustainably sourced materials
Planet	<ul style="list-style-type: none"> Total greenhouse gas emissions (Scope 1, 2 and 3) (tCO₂e) Scope 3 greenhouse gas emissions (tCO₂e) Percentage change carbon emissions across our value chain against Y18/19 baseline Number of countries of operation
People	<ul style="list-style-type: none"> Number of farmers trained in the Primark Sustainable Cotton Programme (“PSCP”)

The selected statements within the Report that are included within the Subject Matter are included in Appendix 1 of our Assurance Statement.

Other than as described in the preceding paragraph, which sets out the scope of our engagement, we did not perform assurance procedures on the remaining information included in the Report, and accordingly, we do not express a conclusion on this information.

CRITERIA APPLIED BY PRIMARK

In preparing the Subject Matter, Primark applied the reporting criteria detailed in the ‘About our Reporting’ section of the Report (the “Criteria”).

PRIMARK’S RESPONSIBILITIES

Primark’s management is responsible for selecting the Criteria, and for presenting the Subject Matter in accordance with that Criteria, in all material respects. This responsibility includes establishing and maintaining internal controls, maintaining adequate records and making estimates that are relevant to the preparation of the subject matter, such that it is free from material misstatement, whether due to fraud or error.

EY’S RESPONSIBILITIES

Our responsibility is to express a conclusion on the presentation of the Subject Matter based on the evidence we have obtained.

We conducted our engagement in accordance with the *International Standard for Assurance Engagements Other Than Audits or Reviews of Historical Financial Information* (‘ISAE 3000 (Revised)’), and the terms of reference for this engagement as agreed with Primark on 20th September 2023. Those standards require that we plan and perform our engagement to express a conclusion on whether we are aware of any material modifications that need to be made to the Subject Matter in order for it to be in accordance with the Criteria, and to issue a report. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risk of material misstatement, whether due to fraud or error.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our limited assurance conclusions.

OUR INDEPENDENCE AND QUALITY MANAGEMENT

We have maintained our independence and confirm that we have met the requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants, and have the required competencies and experience to conduct this assurance engagement.

EY also applies International Standard on *Quality Management 1, Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services engagements*, which requires that we design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

DESCRIPTION OF PROCEDURES PERFORMED

Procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. Our procedures were designed to obtain a limited level of assurance on which to base our conclusion and do not provide all the evidence that would be required to provide a reasonable level of assurance.

Although we considered the effectiveness of management’s internal controls when determining the nature and extent of our procedures, our assurance engagement was not designed to provide assurance on internal controls. Our procedures did not include testing controls or performing procedures relating to checking aggregation or calculation of data within IT systems.

A limited assurance engagement consists of making enquiries, primarily of persons responsible for preparing the Subject Matter and related information, and applying analytical and other appropriate procedures.

The procedures we performed were based on our professional judgement and included the steps outlined below:

1. Interviewed a selection of the Primark’s executives and senior managers to understand the progress made in the Subject Matter during the reporting year and to understand the appropriateness of coverage of sustainability topics within the Report.
2. Completed a visit to Primark’s headquarters to obtain a better understanding of the business operations and reporting practices.
3. Considered the coverage of key issues within the Report against the topics discussed in our management interviews and with process owners.

4. Performed detailed testing on the specific KPIs and carried out the following activities to analyse the Subject Matter:

- i. Walkthroughs and analysis of key documentation: Conducted interviews with key process owners identified by management and analysed key documentation to gain an understanding of the corresponding recording, aggregation, calculation, and reporting processes for the Subject Matter.
- ii. Tested a sample of the disaggregated Subject Matter data back to source evidence.
- iii. Applied analytical procedures to assess the accuracy and completeness of the Subject Matter data in accordance with the Criteria.
- iv. Tested the accuracy of data aggregation for reporting purposes.

5. Assessed supporting evidence for selected statements in the Report to assess whether such statements are fairly stated considering the supporting evidence. Refer to Appendix 1 of this Assurance Statement for the statements subject to our assurance procedures.

We also performed such other procedures as we considered necessary in the circumstances.

CONCLUSION ON SELECTED SUBJECT MATTER PERFORMANCE DATA

Based on our procedures and the evidence obtained, we are not aware of any material modifications that should be made to the Subject Matter for the year ended 31st July 2023 in order for it to be in accordance with the Criteria.

CONCLUSION ON SELECTED STATEMENTS WITHIN THE REPORT

Based on our procedures performed and the evidence obtained, we are not aware of any material modification that should be made to the selected statements (refer to Appendix 1) to be fairly stated in line with the supporting evidence.

USE OF OUR ASSURANCE STATEMENT

We disclaim any assumption of responsibility for any reliance on this assurance report or its conclusions to any persons other than Primark, or for any purpose other than that for which it was prepared.

Accordingly, we accept no liability whatsoever, whether in contract, tort or otherwise, to any third party for any consequences of the use or misuse of this assurance report or its conclusions.

ERNST & YOUNG LLP

23 November 2023

London

APPENDIX 1. SELECTED STATEMENTS WITHIN THE REPORT, FORMING PART OF THE SUBJECT MATTER

We list the selected statements, with the words highlighted in bold, that have been subject to the procedures described in step 5 of the procedures performed within our Assurance Statement.

Where the statements selected contain quantitative information, our procedures performed were the review of supporting evidence to assess whether the statements are fairly stated. Our procedures did not assess the completeness and accuracy of the underlying data, to the degree that we assess the selected performance data forming the other part of our Subject Matter.

Page Number	Statement Within the Report
4	Primark x Rita Ora, which launched this September, is our biggest ever collaboration and I'm proud that two thirds of the ladies clothing in the range contains recycled or more sustainable materials.
9	In cases where we have identified high or salient risk to workers, we implement additional due diligence activities beyond our social audit monitoring programme. The Primark Structural Integrity Programme is an example of this additional due diligence.
9	In other situations, where our team identifies more systemic issues, our Social Impact team works to put in place longer-term solutions and projects to help address these issues. Many of these programmes are discussed in the People section of this report.
12	Earlier this year, Primark and SEWA met with over 70 farmers involved in the programme from the beginning. We heard how, since participating in our PSCP, they continue to actively share learnings and skills on more sustainable cotton farming methods 10 years on. They have also re-invested their improved cotton incomes into their farms and homes, and in the education of their children.
15	As progress towards our commitment, approximately 3,000 PSCP farmers are participating in a three year pilot on regenerative farming practices in India, Bangladesh and Pakistan.
17	We also work hard to ensure that all Primark Cares products containing recycled fibre content meet Primark's quality testing requirements.
18	In 2023, we trained 286 of our supplier on the Primark Cares protocols and standards, helping to support them as they move towards recycled or more sustainable fibres to ensure product claims are accurate. We've also developed digital training modules to educate our Product Teams on how to integrate more of these materials into our products.
19	On our more established product category of denim, where we implemented our extended wash and performance testing 18 months ago, 57% of denim tested passed at 30 washes , the highest level under our enhanced wash framework.
19	This year, we've scaled up our extended durability wash testing to cover 39% of all our clothing.
21	We plan to extend our Textile Takeback scheme across other markets but will only do so when we can be confident our programme complies with local regulations and works for the infrastructure and customers in that country.
21	14. Textile donation (weight in kg) to date July 2023 (ROI, UK, Germany & Austria.): Estimated 346.82 tonnes. Textile donation (%) to date July 2023 (ROI, UK, Germany & Austria.): Estimated 69%.
22	So far, 74% of Primark colleagues in our Product team have taken part in the Foundational CPS training. Our goal is to have all Product team colleagues trained to the Foundational level by the end of 2024.
25	We're proud that, this year, our near-term science-based GHG emissions reduction target has been assessed and validated by the Science Based Targets initiative (SBTi).
26	This year, we've continued the roll-out of our Energy Bureau in the UK, which has now been introduced to 179 stores since 2021.

Page Number	Statement Within the Report
26	This builds on the learnings of our energy and water efficiency pilot projects conducted in recent years in China using the Apparel Impact Institute (Aii) Clean by Design (CbD) programme.
27	Suppliers involved in the programme learn about more energy-efficient practices. They get support on data collection and analysis to create their own emissions reduction action plan, while improving manufacturing processes. These programmes create improvements in factory operations by delivering training, guidance and workshops.
27	In 2022, 1,233 facilities completed their Higg FEM self-assessments. Of that group, 455 sites verified their self-assessment and had an average score of 53%.
27	We also put our China supply chain through the Green Supply Chain CITI evaluation developed by the Institute of Public & Environmental Affairs (IPE), which assesses how well the supply chain is being managed from an environmental point of view. In 2023 Primark improved its CITI score compared to last year, ranking number seven out of 126 companies in the textile industry.
28	As one of our main sources of non-clothing waste, reducing product packaging is a priority focus for us. We've committed to remove all single-use plastics (SUP) by 2027. Since 2019, we estimate we have removed and/or avoided²¹ over 1 billion units of SUP from our business.
28	We've also reduced the thickness of the plastic bag from 65 micron to 60 micron. And while this may seem like a small difference, it has helped us reduce our plastic use by 2.7 tonnes.
29	This year, we've been working to establish the baseline of our water footprint across our supply chain. We expect the results by the end of 2023 and this will enable us to measure our progress towards our water footprint target.
29	Through our PSCP, we're training and influencing farming practices to improve resource efficiency.
29	Between 2018 and 2022, Primark worked with the Apparel Impact Institute (Aii) to enrol six factories onto the Clean by Design (CbD) energy and water efficiency initiative.
30	As part of this commitment, we complete an annual assessment of our chemical management programme. This year, our performance was rated as 'Progressive' in recognition of our continuous improvement.
30	With our support, 80 factories completed ZDHC's Supplier to Zero programme, focused on improving chemicals management systems.
31	We're proud that our own-brand cosmetics are approved by the Leaping Bunny Program, an internationally recognisable gold standard for products that are cruelty-free.
32	In 2022, we worked with Biodiversify to develop a Biodiversity Monitoring Framework for our PSCP programme, that aligned with the Science Based Targets for Nature (SBTN), the Task Force on Nature-related Financial Disclosures (TNFD) and the International Union for Conservation of Nature (IUCN) guidelines for planning and monitoring corporate biodiversity performance.
32	In April and August 2023, the first pilot biodiversity field surveys were carried out on 18 PSCP farms in Gujarat, India, in partnership with the Srushti Conservation Foundation. The objective of this pilot was to evaluate what survey methodologies would be most effective in the field.
37	This year, 93% of suppliers were paid within the agreed time frame. We continue to offer our suppliers 30-day standard payment terms, which we have done for many years.
37	The framework has guided our responsible exit from Myanmar which is conducted with frequent consultation with IndustriALL and other relevant stakeholders. Final orders from Myanmar were shipped at the end of October this year.

Page Number	Statement Within the Report
38	We've subscribed to the FLA 's Fair Compensation Toolkit to pilot collecting wage data in factories across four of our key sourcing markets: Bangladesh, Cambodia, India and Turkey.
42	In 2022, an independent impact assessment by 60 Decibels , a specialist impact measurement company, found that 80% of the workers interviewed said that the technical training they received under the project made them more productive and able to secure higher pay. The majority of respondents reported positive improvements against various indicators that gauged skills enhancement and other socioeconomic benefits.
46	Moner Kotha project.
48	Today, some of the most vulnerable beneficiaries continue to receive non-financial support through our Pashe Achi programme (meaning 'by your side'), a collaboration with the University of Dhaka and other experts. 142 beneficiaries are supported through this programme today. The programme aims to build the confidence and knowledge of those impacted by the tragedy, so that they can manage their financial compensation.
48	If areas are found to require improvement, we work with the suppliers and their factories – in collaboration with a team of structural and civil engineers from international engineering firms – to provide technical support and guidance. Our Structural Integrity Programme expanded to Pakistan in 2015 and Cambodia in 2019 and we also provide ad hoc support as required in other sourcing countries.
51	We have over 76,000 colleagues made up over 180 nationalities , and includes colleagues ranging from age 16 to over 65 years of age. Of our senior roles, 48% are filled by women , helping to create workplaces that are ambitious, engaging and inclusive.

GLOSSARY

Aii	Apparel Impact Institute. A collaboration of brands, manufacturers and industry associations that have come together to select, fund and scale high-impact projects to improve the sustainability outcomes of the apparel and footwear industry.
ACTION, COLLABORATION, TRANSFORMATION (ACT)	Set up in 2014, Action, Collaboration, Transformation (ACT) is an initiative between international retailers and trade unions that aims to raise wages for workers across the garment industry. The initiative is establishing a global framework for the sector to achieve living wages for workers in key sourcing markets through industry-wide collective bargaining supported by responsible purchasing practices. Primark is a founding member of ACT.
AWS	Alliance for Water Stewardship. A global membership collaboration comprising businesses, NGOs and the public sector.
CARE INTERNATIONAL	Global confederation working to fight poverty and social injustice in the world, with a specific focus on the empowerment of women and girls.
CbD	Clean by Design. An approach to green supply chain efficiency which brings together multinational apparel retailers and fashion brands to improve upon environmental impacts in their factories across the globe.
CDP	Carbon Disclosure Project is a not-for-profit that runs the global disclosure system for investors, companies, cities, states and regions to manage their environmental impacts.
CIRCULARITY	A definition inspired by our partner the Ellen MacArthur Foundation, circular products are made from recycled or more sustainably sourced materials and designed with the future in mind. This means they have a longer lifespan when in use and can be recycled into new materials or clothes at end-of-life.
CODE OF CONDUCT	Our Code of Conduct which sets out the standards we expect of our suppliers and partners.
ETI	Ethical Trading Initiative. A leading alliance of companies, trade unions and NGOs that promotes respect for workers' rights across the globe.
FASHION INDUSTRY CHARTER FOR CLIMATE ACTION BY THE UNITED NATIONS FRAMEWORK CONVENTION ON CLIMATE CHANGE (UNFCCC)	<p>The Fashion Industry Charter for Climate Action goes beyond previous industry-wide commitments. Work under the Fashion Industry Charter for Climate Action is guided by its mission to drive the fashion industry to net zero greenhouse gas emissions no later than 2050 in line with keeping global warming below 1.5 degrees.</p> <p>The signatories and supporting organisations of the Charter will work collaboratively to deliver on the commitments enshrined in the document. This will be done through Working Groups, which will bring together relevant stakeholders, experts and initiatives in the fashion and broader textile sector.</p> <p>The Fashion Industry Charter for Climate Action, with its Working Groups, will identify and amplify best practices, strengthen existing efforts, identify and address gaps, facilitate and strengthen collaboration among relevant stakeholders, join resources and share tools to enable the sector to achieve its climate targets.</p> <p>The Industry Charter specifies the following overarching areas of work to be further developed by specific Working Groups:</p> <ul style="list-style-type: none"> • Decarbonisation pathway and GHG emission reductions • Raw material • Manufacturing/Energy • Logistics • Policy engagement • Leveraging existing tools and initiatives • Promoting broader climate action • Brand/Retailer Owned or Operated Emissions

FREEDOM OF ASSOCIATION	This is the right for people to come together with other individuals to collectively express, promote, pursue and/or defend their common interests.
FSC	Forest Stewardship Council. An International, non-governmental organisation dedicated to promoting responsible management of the world's forests.
GIZ	The German Agency for International Cooperation (GIZ) is an internal enterprise owned by the German Federal Government, operating in many fields across more than 130 countries. As a federal enterprise, they support the German Government in achieving its objectives in the field of international cooperation for sustainable development.
GBVH	Gender-based violence and harassment.
GHG EMISSIONS	Emissions of the seven greenhouse gases covered by the Kyoto Protocol – carbon dioxide (CO ₂), methane (CH ₄), nitrous oxide (N ₂ O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulphur hexafluoride (SF ₆) and nitrogen trifluoride (NF ₃).
GHG EMISSIONS (SCOPE 1)	Direct GHG emissions from owned or controlled sources. For example, the use of non-renewable fuels such as natural gas in boilers, as well as fugitive emissions.
GHG EMISSIONS (SCOPE 2)	Indirect GHG emissions associated with the purchase of electricity, steam, or cooling.
GHG EMISSIONS (SCOPE 3)	<p>GHG emissions which are the result of activities from assets not owned or controlled by Primark, but that Primark indirectly impacts in our value chain.</p> <p>The following categories of the GHG Protocol Corporate Value Chain (Scope 3) Standard are included:</p> <p>Upstream emissions</p> <ul style="list-style-type: none"> • Category 1: Purchased goods and services • Category 2: Capital goods • Category 3: Fuel and energy-related activities • Category 4: Upstream transportation and distribution. • Category 5: Waste generated in operations • Category 6: Business travel <p>Downstream emissions</p> <ul style="list-style-type: none"> • Category 11: Use of sold products • Category 12: End-of-life treatment of sold products
GLOBAL LIVING WAGE	We use the definition of a living wage provided by the Global Living Wage Coalition. A living wage is the remuneration received for a standard work week by a worker in a particular place sufficient to afford a decent standard of living for the worker and her or his family. Elements of a decent standard of living include food, water, housing, education, health, transportation, clothing and other essential needs including provision for unexpected events.

GSM (GLOBAL SOURCING MAP)	<p>Primark does not own any factories and is selective about the suppliers with whom we work. Every factory which manufactures product for Primark has to commit to meeting internationally recognised standards, before the first order is placed and throughout the time they work with us.</p> <p>The factories featured on the map are Primark’s suppliers’ production sites which represent approximately 94% of Primark products for sale in our stores. A factory is detailed on the Map only after it has produced products for Primark for a year and has become an established supplier. During the first year a factory has to demonstrate that it can consistently work to Primark’s ethical standards, as well as meet our commercial requirements in areas such as quality and timely delivery.</p> <p>Each factory entry includes the site address, the number of workers and gender split. We will review and update the information on the Map once a year, although we may choose to remove a factory between formal updates, if we are no longer using a particular factory as a supplier. https://globalsourcingmap.primark.com/</p>
GLWC	<p>Global Living Wage Coalition. The GLWC is engaged in both research and action on living wage, with the ambition of ensuring a living wage for all.</p>
GREENHOUSE GASES (GHG)	<p>The atmospheric gases responsible for causing global warming and climate change. The major GHGs are carbon dioxide (CO₂), methane (CH₄) and nitrous oxide (N₂O). Less prevalent – but very powerful – greenhouse gases are hydrofluorocarbons (HFCs), perfluorocarbons (PFCs) and sulphur hexafluoride (SF₆).</p>
IFC	<p>International Finance Corporation. A member of the World Bank Group, advancing economic development and improving the lives of people by encouraging the growth of the private sector in developing countries.</p>
ILGA	<p>The International lesbian, gay, bi-sexual, trans and intersex association</p>
ILO	<p>International Labour Organization. It is part of the United Nations and brings together governments, employers and workers of 187 Member States, to set labour standards, develop policies and devise programmes promoting decent work for all women and men.</p>
LGBTQIA+	<p>Lesbian, Gay, Bisexual, Transgender, Queer (or Questioning), Intersex, Asexual and more.</p>
MONO-MATERIAL	<p>A mono-material refers to a product composed of a single material or fibre. This makes the recycling process much easier, as it reduces the amount of energy required to split or separate various materials.</p>
MORE SUSTAINABLY SOURCED MATERIALS	<p>Materials in which efforts are made to help reduce environmental impact. For more information on the fibres used in our Primark Cares clothes, please visit our fibres glossary.</p>
NEXT GENERATION SOLUTIONS	<p>This is a commitment led by environmental non-profit Canopy towards more sustainable and lower carbon alternatives to raw materials.</p>
RECYCLABLE BY DESIGN	<p>Decisions made in the design and development stage in the manufacture of a product that make it easier to recycle at the end of its life. This could include components that can be dismantled or removed, or using a mono-material instead of a blended fabric to enable recycling.</p>

SBTI	<p>The Science Based Targets initiative (SBTi):</p> <ul style="list-style-type: none"> • Defines and promotes best practice in emissions reductions and net-zero targets in line with climate science. • Provides technical assistance and expert resources to companies who set science-based targets in line with the latest climate science. • Brings together a team of experts to provide companies with independent assessment and validation of targets. • The SBTi is the lead partner of the Business Ambition for 1.5°C campaign - an urgent call to action from a global coalition of UN agencies, business and industry leaders, mobilizing companies to set net-zero science-based targets in line with a 1.5°C future.
SELF-EMPLOYED WOMEN'S ASSOCIATION (SEWA)	<p>A trade union in India which promotes women's rights at work. Primark has worked with SEWA and CottonConnect since 2013 on the Primark Sustainable Cotton Programme. The project supports female cotton farmers to reduce their production costs, adopt more environmentally-friendly farming methods and ultimately increase their earnings.</p>
SINGLE-USE PLASTICS (SUP)	<p>Single-use plastics are products which are used once, or for a short period of time, before being thrown away.</p>
TCFD	<p>The Task Force on Climate-related Financial Disclosures. Created by the Financial Stability Board, the TCFD was developed to provide recommendations on the types of information that companies should disclose to support investors, lenders, and insurance underwriters in appropriately assessing and pricing a specific set of risks-related to climate change.</p>
TIER ONE FACTORY	<p>Factories manufacturing finished goods.</p>
TIER TWO FACTORY	<p>Factories which provide materials and services to tier one factories.</p>
UNFCCC	<p>United Nations Framework Convention on Climate Change. The United Nations Framework Convention on Climate Change has near universal membership (198 countries) and is the parent treaty of the 2015 Paris Agreement to keep the global average temperature rise this century as close as possible to 1.5 degrees Celsius above pre-industrial levels.</p>
UNGPS	<p>United Nations Guiding Principles on Business and Human Rights. These provide a framework for the measures nations and businesses should implement to protect and respect human rights.</p>
UNICEF	<p>United Nations Children's Fund. An agency of the United Nations responsible for providing humanitarian and developmental aid to children worldwide.</p>
WRAP	<p>Waste Resources Action Plan. A climate action NGO working around the globe to tackle the causes of the climate crisis and give the planet a sustainable future.</p>
ZDHC	<p>Zero Discharge of Hazardous Chemicals programme. The programme supports the application of sustainable chemistry and best practices in the textile, leather and footwear industries to protect consumers, workers and the environment.</p>



www.primark.com/primark-cares