

## **SPEAK UP POLICY**

### **Primark Commitment**

At Primark we do business the right way. Good governance and ethical behaviour are at the heart of our agenda. We are committed to always acting with integrity. We proudly promote and protect a culture of trust, fairness and accountability that puts ethics first.

We promote a culture of openness. We know that we are a stronger company when our colleagues feel empowered to Speak Up. We encourage effective and honest communication at all levels of the Company.

If any colleague working at any level of the Company becomes aware of anything they believe to be inappropriate, improper, dishonest, illegal or dangerous, we want them to come forward and express their concerns.

We understand that colleagues may feel nervous about Speaking Up, so we will ensure they are protected from negative consequences as a result of Speaking Up. We hope that colleagues feel able to Speak Up internally; we advise our managers on how to deal with these issues discreetly and appropriately; otherwise we have a confidential and anonymous (where allowed) external mechanism for Speaking Up.

By Speaking Up, colleagues allow us to take action to address their concerns, do the right thing and create a better workplace for everyone.

### **WHY should you SPEAK UP?**

Primark encourages an open culture in all its dealings with colleagues and other people with whom it comes into contact. Effective and honest communication is essential if incidences of inappropriate, improper, dishonest, illegal or dangerous behaviour are to be dealt with effectively.

By letting us know about your concerns, we can ensure that they are addressed appropriately and you can help us safeguard the interests of our colleagues, our Company and the wider community.

Please be aware that Speak Up is not a substitute for normal workplace policies and procedures, such as grievance and disciplinary, or other relevant policies. This is further explained in the section 'WHAT should you Speak Up about?'

### **WHO does SPEAK UP apply to?**

We encourage all colleagues working for Primark in any of our businesses in any country and in any capacity to Speak Up, including colleagues at all levels, directors, part-time and fixed-term workers, casual and agency workers, seconded workers and volunteers.

Where appropriate, we also encourage third parties who are associated with Primark to Speak Up, including shareholders, suppliers, agents, contractors, external consultants, third-party representatives, business partners and sponsors.

All colleagues and third parties working for Primark are welcome to use any of the reporting channels set out in this Policy.

## WHAT should you SPEAK UP about?

If you have a genuine belief that inappropriate, improper, dishonest, illegal or dangerous behaviour is occurring, you can raise your concern in the confidence that we will support you.

The aim of the Speak Up programme is to provide a mechanism for reporting, investigating and remedying inappropriate behaviour. Inappropriate behaviour takes place where an individual or individuals associated with Primark has done, is doing or is going to do something which is inappropriate, improper, dishonest, illegal or dangerous. This includes:

- acting illegally;
- acting unethically;
- acting in breach of operating regulations;
- engaging in fraud;
- failing to comply with legal obligations;
- effecting a miscarriage of justice;
- endangering the health or the physical or moral integrity of an individual;
- causing damage to the environment;
- engaging in bribery;
- facilitating tax evasion;
- engaging in human rights or modern slavery breaches;
- engaging in unauthorized disclosure of confidential information or other data breaches;
- breaching any ABF or Primark policy;
- discrimination, bullying or harassment, including where it raises wider concerns in the public interest
- serious irregularities including in relation to the following:
  - accounting;
  - internal accounting control;
  - auditing;
  - banking and financial crimes;
  - infringement of intellectual property rights;
  - conflicts of interest; and
- deliberate concealment of any of the above.

This is not an exhaustive list, therefore if there is anything else that is causing you concern or you think we should be aware of, please do Speak Up.

Please be aware that Speak Up procedures are not a substitute for normal workplace procedures, such as grievance and disciplinary, or other relevant policies. In particular, you should not use the procedures outlined in this document to raise matters in relation to your personal circumstances such as your terms and conditions of employment. If you are uncertain whether something is within the scope of this Policy, or if you would like to speak to someone in confidence prior to making a formal report, you should seek advice from your People and Culture Team.

## HOW do you SPEAK UP?

### *Option 1: Tell your line manager/head of department*

If you are concerned about anything which you believe to be inappropriate or improper, dishonest, illegal or dangerous, you should feel able to raise it first with your line manager.

This is the normal way in which you should first raise the issue. There is no special procedure for doing this – you can tell them about the problem or put it in writing if you prefer.

### **Option 2: Tell one of the alternative internal contacts**

If you feel unable to raise the matter with someone in your immediate line management, or if you feel that your line manager has not addressed your concern, please bring the issue to the attention of your Speak Up Officer or one of the Alternative Contacts identified below. Again, you can tell them about the problem or put it in writing if you prefer.

If you have reasonable grounds for believing that the Senior Leadership Team of Primark may be involved or condoning the activity, you should first contact the Director of Legal Services of ABF whose contact details appear in the section 'Alternative Contacts' below.

Internal reporting is the best way to get information to the right people who can take early and effective action to resolve or avoid risks to the public interest. Whilst you may have the right to report externally in certain circumstances, we encourage that this be considered as a last resort.

### **Option 3: SPEAK UP line**

We would hope that you feel able to report your concerns to someone internally. However, if the nature of the matter is such that you cannot raise it with any of the contacts identified or, if you have followed the internal channels listed in Options 1 and 2 and you still have concerns, you can contact the Speak Up phone line or webservice.

If you choose to phone the Speak Up line, you will hear a recorded message (in your local language) which asks you to provide the access code unique to Primark. You are then able to record a voice message detailing your concern.

If you choose to use the Speak Up webservice, you will need to provide the Primark access code and will then be given the opportunity to write a message detailing your concern. Text on the webservice is in your local language.

Details of the local phone numbers, web addresses and access codes for Speak Up are available on noticeboards in store.

A transcript of your voice message and/or a copy of any written message will be available on the webservice for review (once any voice message has been transcribed), and you are welcome to provide comments on your original message or additional information at any time.

We do not encourage anonymous reporting, but both the Speak Up line and webservice allow you to remain anonymous if you wish (subject to any local laws which prevent anonymous whistleblowing). Where an anonymous report is made, you should ensure that you provide sufficient detail to allow the matter to be investigated. Anonymous reports that provide insufficient information may not be capable of thorough investigation.

Your report will be passed to ABF and, if appropriate, will then be passed on to Primark to be addressed in accordance with our Speak Up procedures.

### **WHAT will happen next?**

The same process will be followed no matter which channel you have chosen to report your concern.

Once you have reported your concern, your report will be acknowledged and appropriate initial enquiries and an initial assessment of how to proceed will be carried out. This will be undertaken as quickly as possible. As part of this initial assessment you may be asked to

provide additional information about your concern.

- If you have reported your concern to someone internally, you will be contacted by that person or another person appropriate to assist with the assessment. If you are asked to a meeting, you will be able to bring a colleague with you. Your colleague must respect the confidentiality of your disclosure and any subsequent investigation.
- If you have reported your concern through the Speak Up line or webservice, you will receive a unique case number. If you go back into the Speak Up line or webservice and use this number, you will be able to listen/read the acknowledgement of your report (within 7 days), any requests for more information and any update on the status of your concern.

The initial assessment may lead to a formal investigation which, depending on what is found, will determine the action to be taken and the timescales involved.

You will be provided with feedback in relation to your report. Where possible, you will be informed of the outcome of any enquiries and investigations and any actions taken (subject to confidentiality requirements).

If your concern falls more properly within other policies (e.g. discipline, grievance, etc.), your contact will tell you.

If you are unhappy with the response you receive, remember you can go to any of the other contacts detailed in this Policy. Primark is committed to ensuring any such issues are handled fairly and properly.

## HOW will we protect you?

### From repercussions

We will not tolerate the victimisation of anyone raising a genuine concern: we will ensure that you are supported and protected from adverse repercussions, retaliation or detriment.

Provided you have a reasonable belief that something inappropriate has occurred, is occurring or is likely to occur, it doesn't matter if you are mistaken.

Having raised your concern, the person to whom the disclosure has been made will, unless otherwise advised, act as your point of contact in the matter. Should you feel that there is any detriment to you or your career, as a result of raising the concern, this should be reported immediately to your contact or one of the other contacts listed in the section 'Alternative Contacts' below.

It is a disciplinary offence to threaten, treat detrimentally, or retaliate against those who Speak Up in any way.

It is also a disciplinary offence to raise an allegation maliciously or dishonestly.

### Your identity

We hope you feel able to Speak Up openly. However, if you want to raise a concern confidentially, we will take all reasonable steps to keep your identity secret. We will only make your name known to those people who need to know it in order to investigate the allegation or otherwise as required by law.

We do not encourage colleagues to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you and it may be more difficult to establish whether any allegations are credible.

If you wish to be completely anonymous, you can contact the external Speak Up line.

Anonymity is possible in countries where this is legally allowed. Sometimes this will depend on the nature of your concern.

## PRIVACY

Any personal data that identifies you or another person obtained as part of any concern raised under this Policy will only be used for the purposes described in this Policy and in accordance with relevant data protection laws. See the Privacy Notice which is attached as Appendix 2 to this Policy for more information about how ABF handles personal data submitted through the Speak Up line and webservice, which applies in addition to any data protection policies or notices held locally.

Individuals whose data is handled through the Speak Up line and webservice have rights provided by data protection law as further explained in the applicable Privacy Notice.

## OTHER

Unless otherwise provided for by law, this Policy does not form part of any colleague's contract of employment and we may amend it at any time.

## ALTERNATIVE CONTACTS

### Speak Up Officers

Details of your local Speak Up Officer can be found here:

**Dave Bradley, Director of People and Culture**

**Email: [speakupretail@primark.co.uk](mailto:speakupretail@primark.co.uk)**

### Alternative Contacts at ABF

Director of Financial Control, James Rushton,  
Associated British Foods plc, Weston Centre,  
10 Grosvenor Street, London W1K 4QY  
Tel: 020 7399 6567

Director of Legal Services, Paul Lister,  
Associated British Foods plc, Weston Centre,  
10 Grosvenor Street, London W1K 4QY  
Tel: 020 7399 6512

Chief People and Performance Officer, Sue Whalley,  
Associated British Foods plc, Weston Centre  
10 Grosvenor Street, London W1K 4QY  
Tel: 020 7399 6562

Head of Legal – Global Competition and Compliance, Julian Mieзитis,  
Associated British Foods plc,  
50-51 Russell Square, London WC1B 4JA  
Tel: 001 224 4778510

## APPENDIX 1

### SPEAK UP – LOCAL CONTACT NUMBERS, WEB ADDRESSES AND ACCESS CODES

<b>Country</b>	<b>Telephone</b>	<b>Web address</b>	<b>Access Code</b>
AUSTRIA	0800-295175	<a href="http://www.speakupfeedback.eu/web/primark/">www.speakupfeedback.eu/web/primark/</a>	19970
BELGIUM	0800-71365	<a href="http://www.speakupfeedback.eu/web/primark/be">www.speakupfeedback.eu/web/primark/be</a>	19970
CZECH REPUBLIC	800 900 538	<a href="http://www.speakupfeedback.eu/web/primark/cz">www.speakupfeedback.eu/web/primark/cz</a>	19970
FRANCE	0800 908 810	<a href="http://www.speakupfeedback.eu/web/primark/fr">www.speakupfeedback.eu/web/primark/fr</a>	19970
GERMANY	0800-1801733	<a href="http://www.speakupfeedback.eu/web/primark/de">www.speakupfeedback.eu/web/primark/de</a>	19970
IRELAND	1800-552 136	<a href="http://www.speakupfeedback.eu/web/primark/ie">www.speakupfeedback.eu/web/primark/ie</a>	19970
ITALY	800 787 639	<a href="http://www.speakupfeedback.eu/web/primark/it">www.speakupfeedback.eu/web/primark/it</a>	19970
NETHERLANDS	0800 0222931	<a href="http://www.speakupfeedback.eu/web/primark/nl">www.speakupfeedback.eu/web/primark/nl</a>	19970
POLAND	00 800 4411739	<a href="http://www.speakupfeedback.eu/web/primark/pl">www.speakupfeedback.eu/web/primark/pl</a>	19970
PORTUGAL	800-831528	<a href="http://www.speakupfeedback.eu/web/primark/pt">www.speakupfeedback.eu/web/primark/pt</a>	19970
SLOVENIA	0 800 80806	<a href="http://www.speakupfeedback.eu/web/primark/si">www.speakupfeedback.eu/web/primark/si</a>	19970
SPAIN	900-973174	<a href="http://www.speakupfeedback.eu/web/primark/es">www.speakupfeedback.eu/web/primark/es</a>	19970
UNITED KINGDOM	0800 1693502	<a href="http://www.speakupfeedback.eu/web/primark/gb">www.speakupfeedback.eu/web/primark/gb</a>	19970
UNITED STATES	1-866-2506706	<a href="http://www.speakupfeedback.eu/web/primark/us">www.speakupfeedback.eu/web/primark/us</a>	19970

## APPENDIX 2

### SPEAK UP – YOUR PRIVACY

For the purposes of European data protection legislation, Associated British Foods plc is the data controller with responsibility for personal data you submit through our Speak Up line or webservice. It will also be a data controller in connection with reports that are escalated to Associated British Foods plc through our Speak Up Policy. Where reports require joint investigations involving ABF group companies, ABF acts as a joint controller with the relevant group company. To identify the other joint controller(s) who may be responsible for the processing of your personal data, please contact us using the contact details at the end of this notice.

#### Your personal data

We use the personal data submitted under our Speak Up Policy only for the purposes of investigating allegations of inappropriate, improper, dishonest, illegal or dangerous behaviour (“inappropriate behaviour”) under our Speak Up Policy and in compliance with applicable laws. This notice tells you about the information we collect when you report inappropriate behaviour and how that information is used and shared within the ABF Group.

#### What personal data do we process?

If you report an issue through the Speak Up line or webservice we collect whatever personal details you include in your report about you or anyone you identify in your report. We do not (except in some territories where this is required) require you to leave your name. We do encourage you to identify yourself, as concerns raised anonymously tend to be far less effective and if we do not have enough information, a full investigation may not be possible.

If we receive a report that you have submitted to your line manager or other colleague, we record the same information.

However you report, we encourage you to include only the relevant details that will help us investigate. This may include a limited amount of personal information falling into special categories, sometimes called “sensitive personal data”. This term includes information relating to such matters as racial or ethnic origin, religious beliefs, physical or mental health, trade union membership, sexual orientation, information regarding sexual life, biometric data, genetic data, criminal records and information regarding criminal offences or proceedings.

If you are the subject of a report or named in a report, we will endeavour to inform you promptly, unless doing so might prejudice the investigation or we are prohibited from doing so by law.

#### How do we use this data?

Voice reports submitted through the system are briefly recorded and then transcripts created both in original language and English. All transcripts and online reports, irrespective of country of origin, are stored in a case management system and sent to ABF.

We use data submitted to us for the purposes of reviewing the report and, where appropriate, investigating allegations made. Our use of this data is generally necessary for



our legitimate interests in relation to these purposes and we put in place appropriate measures to protect the individuals involved.

Where your report includes special categories of personal data and/or personal data regarding criminal offences or proceedings, generally speaking our use of this data is necessary for our legitimate interests (as described above) and:

- In respect of the use of special categories of personal data, necessary for substantial public interests and/or necessary for the establishment or defence of legal claims; and
- In respect of information relating to criminal offences or allegations, necessary to detect or prevent unlawful acts.

### **Sharing your data**

Reports submitted through the system will be reviewed by ABF and then directed as appropriate.

Any reports submitted through the Speak Up system that relate specifically to your personal circumstances will initially be directed to the appropriate HR Director to deal with according to local HR procedures.

Other reports will typically be passed to Primark's Chief Financial Officer, Group Director People and Culture, and/or Head of Assurance to assist with the appropriate investigation. In addition, reports of issues relating to fraud, tax evasion, bribery and corruption, sanctions, competition law, potentially material events for ABF, health & safety issues, inappropriate behaviour of senior managers and ethical procurement will be shared with directors and senior management at ABF.

Local investigations may be carried out in conjunction with the Primark Head of Security and ABF Group Security team where appropriate.

In order to keep an overview of any trends or areas of concern where further training or other steps are needed, all reports will be anonymised and collated into summary reports by ABF for quarterly review by the ABF Chief People & Performance Officer and the ABF Director of Financial Control and annual reports to the Audit Committee of the ABF Board.

### **How long do we keep your data?**

Initial voice recordings are deleted once transcripts are created. The transcripts of reports will be retained within the Speak Up system for the period of time to investigate and once a case has been 'closed', for a further period of 60 days. All identifying information is then deleted and only a statistical record of the type of report, the location and the outcome of the investigation are retained for internal reporting purposes.

### **Where is your data held and transferred?**

Reports submitted through the Speak Up line and webservice will be stored on our supplier's servers in the Netherlands, Europe. Your data will also be accessed by ABF in the UK and then allocated for investigation to the most appropriate business. This means your data will be transferred to the UK and the Netherlands and to the relevant investigation team, wherever they are based. We have put in place an intragroup data sharing agreement



between ABF and all affiliates to ensure appropriate protection of the personal data submitted where data is transferred by ABF out of the UK.

## Your Rights

You can ask us at any time to provide you with a copy of your personal data. If you think the personal data we hold about you is inaccurate or incomplete, you can ask us to correct it or complete it. In some circumstances you also have the right to object to our use of your data and the right to ask us to restrict our use of your data or to delete it. There are some exceptions to these rights however. For example, it will not be possible for us to delete your data if we are required by law to keep it or if we need to use it in order to establish or defend a legal claim.

If you wish to access your personal data or exercise any of your rights, you should contact the ABF Legal Team on [Legal.Inbox@abfoods.com](mailto:Legal.Inbox@abfoods.com) in the first instance. If you have a concern about the way we handle your information you have the right to complain to the Information Commissioner's office (ICO) (<https://ico.org.uk/concerns> or by calling the ICO (0303 123 1113)) or to your local data protection supervisory authority.