

Primark Ltd.

Modern Slavery

Statement

2021

Our commitment (introduction from Paul Marchant)	2
Our company	2
Our response to Covid-19	3
Accountability	3
Our policies and approach	5
Addressing issues of gender in our supply chain	6
Due diligence to identify risks	7
Supplier selection	9
Training and awareness raising	11
Stakeholders and partnerships	15
Traceability and transparency of supply chains	16
Purchasing practices	17
Freedom of association and worker representation	18
Responsible Recruitment	19
Helping workers and communities understand their rights and the risk of modern slavery	20
Access to remedy and grievance mechanisms	26
Providing remedy and investigating allegations	31
Measuring our impact	31
Global risks within the garment sector	32

Our commitment

We are pleased to share our sixth Modern Slavery statement which covers our activities for the financial year ending 18th September 2021, in respect of the requirements under the UK Modern Slavery Act 2015.

Modern slavery is one of the most salient risks within global supply chains. Our commitment to our customers and stakeholders on this is very clear: it is a zero-tolerance issue at Primark. We take our responsibility to respect human rights extremely seriously and are committed to preventing and addressing any modern slavery risks that we identify in our operations and, where we can, in our supply chain. We do this in line with the United Nations Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Supply Chains.

In this statement we outline how our commitment is put into practice through our wider risk and due diligence processes, highlighting areas of risk we have identified and steps we are taking to address these risks directly ourselves, with our partners and with stakeholders across the industry.

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

This statement was endorsed by the board of Primark Limited in March 2022.



Paul Marchant

CEO of Primark

March 2022

Our company

Primark is an international retail company employing over 70,000 people. Our range includes womenswear, menswear, childrenswear, footwear, accessories, beauty, and homeware. We are headquartered in Dublin, Republic of Ireland and have over 400 stores in 14 countries including the UK, Republic of Ireland, mainland Europe and the USA. We work with hundreds of suppliers, and through them deal with over 900 factories across 26 countries. And while we don't own the factories that produce our goods, we recognise we have a responsibility to ensure our products are made in good working conditions and free from modern slavery.



500

suppliers



928

factories



28

countries



582,918

workers



321,193

female workers



261,725

male workers



1206

audits conducted in 2020¹

Primark is part of the Associated British Foods plc group of companies and, for the purposes of the UK Modern Slavery Act 2015, it is covered by the ABF Modern Slavery Statement.

¹All data is correct as of March 2022. Information is taken from the [Primark Global Sourcing Map](#) which shows first-tier production sites which make Primark's products. The factories featured on the map are Primark's suppliers' production sites which represent over 95% of Primark products for sale in our stores. Production sites are included once they have worked for us for over one year.

Assured figure by auditors KPMG. This figure is lower than in previous years as we were prevented from conducting audits in line with our policy on auditing 100% of sites annually, due to Covid restrictions and lockdowns. [Assurance statement](#).

Our response to Covid-19

The impacts of the Covid-19 pandemic on people's lives continue to be felt across our supply chain.

In response to the lasting impact of the pandemic for many workers, we have doubled down in our efforts to support their wellbeing and their access to decent work. Vulnerabilities that many workers already faced have been exacerbated as many were left to bear the emotional, physical, and economic scar from a variety of outcomes, from temporary to total loss of work and income, short or long-term illness and the loss of family members in countries with little or no public health care and social security. This has been particularly true for women who continue to be disproportionately impacted by the pandemic².

In addition to family hardship, their responsibilities for caring for family members affected by Covid-19 in the home has also grown.

Primark's Ethical Trade team has worked to support the welfare of workers and farmers in its supply chain since the onset of the pandemic. A short-term "wages fund" was established in seven key sourcing countries to support our suppliers' ability to pay wages at the same time as we were forced to close the majority of our stores. Garment orders that were cancelled at the outbreak of the pandemic were either subsequently reinstated in full; superseded with new orders; or where this was not possible, the fabric liabilities were paid for, meaning that all garments both finished and in production, as well as any fabric costs incurred for Primark prior to the stores closing, were paid for in full.

Alongside our work to uphold our ethical standards in line with our [Supplier Code of Conduct](#) and international guidance and best practice, we also needed to re-evaluate our existing activities and partnerships given some of the challenges that Covid-19 presented in markets for workers and established new ones to provide support. This has evolved to look differently in each country dependent on differing needs, the nature of the pandemic across different countries and the availability of opportunities for partnerships and collaborations.

We currently deliver such activities across several of our sourcing countries, with most of the activities locally designed and delivered through our Ethical Trade and Environmental Sustainability teams located in the countries we source from. In India and Bangladesh our teams' efforts to educate workers and management in our supply chain on COVID-19, including the vaccine, were successful at scale.

² https://www.ilo.org/global/about-the-ilo/newsroom/news/WCMS_813449/lang--en/index.htm

Accountability

Our organisation and structure

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

- Primark is part of the ABF group of companies and for the purposes of the UK Modern Slavery Act 2015 it is covered by the ABF Modern Slavery Statement.
- Responsibility and accountability for risk management, including in relation to modern slavery due diligence, sits with the chief executives of each ABF business, and the board of ABF provides continuous oversight and support.
- The board of Primark Limited oversees the strategy around the due diligence of modern slavery risks that are specific to the Primark business and supply chain, and it reports on this process to the ABF board on a regular basis.
- The ABF Group Corporate Responsibility Director has oversight of the development of Primark's policy relating to modern slavery due diligence. The Primark Ethical Trade and Environmental Sustainability Operations Director is responsible for operational implementation. Both report to ABF's Director of Legal Services and Company Secretary.
- Primark's Ethical Trade and Environmental Sustainability (ETES) team of over 130 local experts based in ten major sourcing countries manages the due diligence within the factories that produce our products. This team engages directly with workers in our supply chain and our external partners and experts on the ground, and reports on the results of the due diligence.

Potential and actual risks of modern slavery within the supply chain are managed by the Primark Ethical Trade and Environmental Sustainability Operations Director and are reported to the ABF Group Corporate Responsibility Director. Severe risks are reported to the Primark Leadership Team and the Primark Business Risk Committee and escalated to the boards of Primark and ABF as necessary.

Policy and legislation

Government policy and legislation to address modern slavery and wider human rights risks continues to develop and we are supportive of such measures.

Our engagement in 2020-21 has included:

- **UK Modern Slavery Transparency in Supply Chains.** As a founding member of the Business Against Slavery Group (BAS) we have participated in discussions with UK Government on addressing modern slavery throughout the supply chain, and with the Home Office in respect of our support for the Modern Slavery Registry.
- **EU legislation on mandatory human rights and environmental due diligence.** Primark is a member of the Sustainable Apparel Coalition (SAC) and we provided input into the SAC Policy Hub submission to the EU on the EU Directive on Sustainable Corporate Governance.
- **Garment Industry Call to Action.** Primark endorses the Call to Action convened by the IOE, ITUC and ILO which aims to protect workers' income, health and employment and social protection.
- **Myanmar.** Discussions with the Foreign, Commonwealth and Development Office (FCDO), the Department for International Trade (DIT), the Department for Business, Energy, and Industrial Strategy (BEIS) and the Home Office have informed our on-going human rights due diligence approach to sourcing from Myanmar.
- **Issues concerning the Xinjiang Uighur Autonomous Region.** We have engaged with BEIS and FCDO in respect of sectoral allegations of forced labour in the Xinjiang Uighur Autonomous Region (XUAR) in China. Our written submission to the Foreign Affairs Select Committee can be read [here](#).
- **Gender-based Violence and Harassment.** Through our partnership with Care International to address gender-based violence and harassment in supply chains, we support efforts to advocate for better policy and legislation.

Communicating our progress

Communicating our progress is important if our industry is to have an impact in addressing modern slavery and we aim to be transparent in our efforts and to share our learnings.

We report on our progress through our Modern Slavery Act statements and welcome the launch of the UK Government Modern Slavery Registry to provide an accessible repository for company statements. The ABF Group is considering how best to represent the diversity of its businesses in the Registry, and we will submit in line with the Group's proposals. We will also continue to publish our statements on our [website](#) which includes our previous statements from 2016 onwards.

KnowTheChain benchmarks our performance on disclosure of our efforts to address the risk of modern slavery and we welcome their feedback which can be read [here](#).

We communicate our programme and performance through the Primark Cares [website](#) and the [ABF Responsibility Report](#). As members of the Ethical Trading Initiative (ETI) and the German Partnership for Sustainable Textiles, we are assessed regularly on our due diligence. We also provide regular updates directly to our shareholders and stakeholders.

Primark Cares

In 2021 we launched Primark Cares, which outlines our key strategic sustainability commitments.

Primark has been working to become a more sustainable and ethical business over the past ten years. We've made significant progress in that time but we knew we needed to do more and go further.

Our Primark Cares strategy aims to build on these foundations and accelerate our commitments towards becoming a more sustainable business. Looking ahead over the next decade, Primark Cares will change how we do business and goes to the very heart of what we do. There are three pillars to the strategy – Product, Planet and People – each of which has a clear ambition and supporting targets. Our overall vision for Primark is to make more sustainable fashion affordable for all.

The People pillar is the most directly relevant to our work to address modern slavery, although all three play a role in ensuring we build more sustainable supply chains and products. Our commitment under this is to protect and improve the livelihoods of the people who make our clothes. Specifically, our commitments are to:

1. Create financial resilience: we will pursue a living wage for workers in the supply chain and support with financial literacy training and access to social protection by 2030.
2. Promote equal opportunities: we will strengthen the position of women through skills development and addressing their barriers to progression by 2030.
3. Improve overall health and wellbeing: we will ensure access to effective grievance processes and widen access to help for mental and physical wellbeing by 2030.

Full information on Primark Cares and the targets within each of the three pillars can be found on our Primark Cares [website](#).

Our policies and approach

We have policies and procedures in place for our suppliers, business partners and our employees to ensure that our standards are being met and to help individuals raise issues and concerns. All Primark's policies are reviewed and (if necessary) updated, to ensure they are fit for purpose, aligned with international standards and best practice, and address the most salient risks within the supply chain. The Board of Primark Limited has accountability for the approval of policies.

We have published our Supply Chain Human Rights Policy in 2022, developed through stakeholder engagement and consultation, and sponsored and signed off by Paul Marchant, Primark CEO. This policy sets out our commitments and contribution to the UN Sustainable Development Agenda, and in particular Sustainable Development Goal 8 on Decent Work (Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all). The policy sets out how we enact the UN Guiding Principles for Business and Human Rights, and how through the guidelines from the OECD, we engage in responsible business conduct and supply chain due diligence.

Our Supplier Code of Conduct is based on the UN's ILO Core Conventions and Fundamental Principles including the elimination of Forced Labour. The scope of the Code covers our supply chain including goods for sale, services (such as service providers, logistics and transportation) and goods not for sale.

The Code forms part of Primark's Business Terms and Conditions covering all suppliers of finished goods. This states the supplier is responsible for compliance with the Code in its supply chain and that audit rights are granted with unfettered access. The Code is updated regularly following internal review and with input from external stakeholders. To ensure that workers can read the Code in their own language, it is available in 44 languages, and can be accessed publicly [here](#).

The most recent update to the Code was in 2020. This update included strengthening sections on forced labour, living wages, freedom of association, child labour and health and safety, as well as a new clause requiring suppliers to implement their own workplace grievance procedures.

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

Employment is freely chosen

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

Training and guidance for suppliers on the new requirements of the Code was rolled out progressively from October 2020.

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

All 130 members of Primark's Ethical Trade and Environmental Sustainability (ETES) team must complete ABF's online Anti-Bribery and Corruption training module once a year. Additionally, the ABF legal team deliver direct face to face training with our teams located in our sourcing countries approximately every 18 months (although this was delayed due to Covid-19 restrictions), which allows for direct discussion and to enable a forum where specific questions or concerns can be raised and addressed.

We also require relevant third party service providers and partners, regardless of size, location or type of service provided, are required to undergo our training programme where our assessment indicates there is a need. In line with our Supplier Code of Conduct, Primark's suppliers are required to put in place anti-bribery and corruption procedures for their own businesses.

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

We have included further information on how we are supporting workers and others to raise concerns on page 31.

Addressing issues of gender in our supply chain

Women account for the majority of our global Tier 1 supplier workforce, with around 320,000 women in total. We recognise that women globally, both in the workplace and domestically, face increased risks of modern slavery. Gender is an issue that cuts across all human rights risks within the supply chain.

We are committed to gender equality and addressing gender discrimination. Under Primark Cares, our 2021 sustainability strategy, we have committed to strengthening the position of women in the supply chain through skills development and addressing barriers to promotion and progression by 2030, through the following:

- **Creating financial resilience:** we will pursue a living for workers in the supply chain and support with financial literacy training and access to social protection by 2030.
- **Promoting equal opportunities:** we will strengthen the position of women through skills development and addressing by their barriers to progression by 2030.
- **Improving health and wellbeing:** we will ensure access to effective grievance mechanisms and widen access to help for mental and physical wellbeing by 2030.

Gender-based violence and harassment

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

We continue to build and strengthen our approach to tackle this complex and serious issue. We were a member of the Business Fights Poverty peer circle on Tackling GBVH in global supply chains.

This has provided access to learning and advice from international experts such as the International Finance Corporation (IFC) and companies from other sectors such as agriculture and mining. We understand that addressing and preventing risks to women requires a systems-led approach.

Highlights of our work this year to address the risks of gender-based violence and harassment and promote gender equality.

South India

- Primark's My Space programme introduced training on sexual harassment for staff and workers who were being trained to become workplace counsellors. Factories are encouraged to appoint those who have been trained to their Internal Complaints Committees, the formal mechanism through which cases of workplace sexual harassment are addressed in India. Feedback from an expert advisor observing a factory training session on this topic provided insight into the nature of this issue and the complexities of addressing it.

"The group had many questions and struggled with some of the concepts. This was the first time many had been introduced to the concepts of equality, victim blaming etc." Based on this feedback it was decided to sensitively introduce some of these concepts earlier in the course through role play scenarios and other group work examples to support these discussions.

Vietnam and Cambodia

- The Enhancing Women's Voice to STOP sexual harassment (STOP) project programme with CARE International was implemented in selected factories. The programme develops, tests, and adapts workplace models for preventing and responding to sexual harassment.
- We piloted the International Center for Research on Women (ICRW) Gender Equity Self-Diagnostic Tool in one factory in Vietnam. This provided feedback for ICRW in refining the tool, and remediation actions for the factory to address the issues that had been raised.

Turkey

- We established a partnership with the local NGO ACEV to support knowledge and action to address gender inequality in the workplace and launched our new programme with them in five factories.

Bangladesh

- Our partnership with the ETI on its Social Dialogue programme was expanded to include training on sexual harassment for workers and management representatives of factory Sexual Harassment Complain Committees (SHCC). **More information on our programmes can be found on page 23.**

Due diligence to identify risks

We conduct on-going due diligence to identify human rights risks, including modern slavery, in our supply chain. Our process aligns with the UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Supply Chains and is the result of in-depth benchmarking and consultation with human rights organisations. Our process to identify human rights risks consists of the below four main components.

Country risk assessments

We conduct research using existing external reports and sources of publicly available credible information to build an assessment of every country we source from. This includes political, economic, social, and legal analysis and risk-mapping including modern slavery risks. Assessments consider both the garment and footwear sector and

additional relevant sectors and industries. This helps us to:

- Build a comprehensive picture of the risks in each country in our supply chain, including those risks that fall into the classification of modern-day slavery. In 2020, we began work on revising and strengthening the country risk assessment protocol to include additional details of forced labour indicators
- Understand the deeper root causes of these risks with a view to their prevention or mitigation
- Identify key stakeholders and initiatives working on these issues that we can engage with and learn from

Analysis from internal data

Primark's local ETES team is one of our most important resources. The team of over 130 local experts are our 'eyes and ears' on the ground. Based in ten of our major sourcing countries, they have been recruited from a range of different organisations including other companies, development agencies and civil society.

The team is responsible for due diligence implementation within the factories that produce our products and engage directly with workers in our supply chain and our external partners and experts on the ground. This on-the-ground engagement adds an additional layer of insight and visibility into working conditions and human rights risks within the supply chain.

We conduct unannounced audits on all Tier 1 factories and are increasingly assessing Tier 2 sites in our supply chain which provides us with information on risks at a site level. Further information on our audit programme is on page 10. At a macro level, we are also able to draw from intelligence and analysis of over 37,400 audits conducted on Primark's suppliers since 2007 which allows us to conduct risk analysis.

Stakeholder consultation

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

Rights holder consultation and worker engagement

Workers in the supply chain are rights-holders yet are often excluded from the due diligence process or face obstacles in getting their voices and views heard.

We have developed specific tools and methods to support worker voice, such as Drawing the Line, used successfully in Myanmar and India. Drawing the Line is a participatory method to engage groups of workers on a discussion on their unmet needs in the workplace, and how they can approach securing those needs.

In Bangladesh, the Soromik er Kotha programme, used community networks to establish contact with 400 workers and gather regular anonymous feedback on key issues including health and safety in the workplace and payment of wages.

Structural integrity

All workers should work in safe conditions. Following the Rana Plaza tragedy in 2013, we established a Structural Integrity programme in May 2013 to identify countries where structural integrity of buildings was a risk. We directly assess all first- and second-tier sites in Bangladesh and Pakistan, and all first-tier sites in Myanmar as part of our factory approval process.

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

Heightened assessments for critical or severe risks

We work with experts to conduct heightened due diligence where assessments or third-party allegations highlight severe risk of forced or child labour or other severe human rights abuses in our supply chain.

We do not source from supply chains with severe risks of systemic and endemic forced or child labour and where we are unable to conduct due diligence in full.

Examples of this include Uzbekistan, Turkmenistan, and XUAR. Further information is available on page 32.

Supplier selection

Selecting suppliers that meet and share our standards

Our auditing and monitoring programme assess the risk of modern slavery in line with our Code of Conduct.

- We audit all first-tier sites both before any orders are placed and then on a regular basis (at least annually).
- All audits are unannounced, apart from the initial audit used to gain approval for Primark production. For these sites, production is only permitted once the ETES team is satisfied that Primark's standards as set out in the Supplier Code of Conduct are met.
- All audits include rigorous checks for forced and trafficked labour including a review of relevant documentation, confidential worker interviews, visits to associated production facilities, and worker accommodation if provided by the factory. We use the ILO indicators of forced labour as a reference within our audit process.
- We may also conduct worker interviews off-site if we deem it necessary and may use support from NGOs or other experts.
- We follow SMETA best practice guidance on the sample number of workers interviewed³.
- Our own auditors are trained to SA8000 standards and conduct our audits, with the balance of our audits conducted by carefully selected third party auditors.
- Where audits or third-party allegations highlight a severe risk of forced labour, we work with experts to conduct deeper dive audits which employ worker-centric and forensic auditing techniques and provide sensitive and tailored remediation and on-going support for workers.
- After each audit, the factory is issued with a corrective action plan (CAP) which outlines the areas for improvement. Each item in the CAP is timebound and the CAP contains practical guidance to help factory management implement the recommended action.
- We verify implementation of the CAP through on-going monitoring including follow-up audits, spot-checks, document review and worker interviews.

- Our suppliers are responsible for compliance with and implementation of the Supplier Code of Conduct across their supply chain, factories, and contractors.
- Suppliers must make sure they do not source components or materials for use in Primark products that are made using forced or trafficked labour.
- If at any point we identify any issues that present a severe and imminent threat to workers' lives or safety, we prioritise these risks for remediation, and the factory is immediately suspended from our purchase order system until we can verify that the issue has been fully addressed.
- In cases where suppliers are either unable to make improvements or lack commitment to do so, we have a clear process on termination. We work with the supplier and our commercial teams on a responsibly managed exit plan in line with the ACT on Living Wages (ACT) Responsible Exit Policy. The policy is designed to ensure that when a commercial relationship with a supplier or factory comes to an end, both the buyer (brand) and the supplier have assessed the risks to workers.

The Primark Sourcing Team conducts dependency reviews with suppliers and factories to indicate relative dependencies and risks on both sides, giving our supply chain partners an opportunity to mitigate any impacts where required.

Primark is a partner member of the ILO Better Work programme, a collaboration between the ILO and the IFC. Primark factories enrolled in Better Work go through a process of learning that includes assessments, advisory services, industry seminars and training. Conditions and improvements in each factory are assessed by Better Work's enterprise advisors based on the Better Work Compliance Assessment Tool. Assessment results are accessed by Primark in countries including Vietnam and Cambodia.

Unauthorised subcontracting

Unauthorised sub-contracting is not permitted and is a breach of Primark's Business Terms and Conditions. Our ETES team conducts an immediate unannounced assessment of any factory where unauthorised sub-contracting is suspected. The assessment focuses on whether unauthorised sub-contracting has taken place and whether there are any severe issues including forced and child labour at the unauthorised factory.

³ <https://www.sedex.com/wp-content/uploads/2019/05/SMETA-6.1-Best-Practice-Guidance.pdf>

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

Where severe issues linked to Primark production are identified at the unauthorised factory, we require the supplier and/or the approved factory to work with us on a remediation programme to ensure issues are addressed. All Primark goods produced by the unauthorised factory are removed.

Addressing gender through audit programme

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

In 2020, we committed to strengthen our audit programmes to better identify and remediate issues related to gender discrimination. A first step was to start training our team to raise their awareness of how gender-based risks present themselves in the workplace and how these risks could be identified within the audit process or through other engagement with workers.

We provided training for the ETES team on Gender Mainstreaming and Gender-Based Violence, and we are planning more training this year. We also partnered with the UK FCDO on its Work and Opportunities for Women (WOW) programme to analyse our audit data and WOW provided several recommendations on how our audit programme could be enhanced.

Case study 1: Gender discrimination in recruitment and hiring process

Primark's Ethical Trade audit team identified gender discrimination at several points in the recruitment process of a Turkish factory. This included discriminatory phrases in job advertisements, female job applicants passed over for male applicants, a lack of gender diversity within management and staff of the production department, and a lack of facilities for women in the factory including toilets, locker rooms and prayer rooms in the production areas.

As part of the corrective action plan (CAP), workplace training on gender equality and diversity was held for over 100 workers and 15 management and human resources staff. The factory set gender equality targets to achieve 10% of women in production in Year 1 and constructed facilities for women. The factory reviewed and updated its employment and management policies and procedures to ensure that the correct systems were in place.

The main outcome of this training was increased awareness of gender equality, discrimination, and gender-based violence issues in the workplace.

This was confirmed by feedback from workers and management to the Primark team. These outcomes were verified during the re-audit conducted three months after the training which also concluded that the factory had reviewed and improved their management systems related to grievance, harassment, recruitment, and disciplinary procedures, and had introduced targets on gender equality in management especially at supervisor level.

Case study 2: Discrimination against pregnant workers

Primark was notified by the Bangladesh RMG Sustainability Council (RSC) in November 2020 that three pregnant workers in a factory producing for Primark had been forced to resign by factory management. Primark conducted an audit to investigate these issues and found that factory management had forced pregnant workers to resign, and in one case by signing a blank letter of resignation, to avoid having to pay the legally required maternity benefits.

As a result of the audit, the factory contacted the workers and informed them that they were entitled to receive unpaid benefits and be reinstated in their roles. The factory was also required to ensure it had implemented policies and systems and monitoring on discrimination and provided management training to prevent such practices from re-occurring.

Audit indicators

56%	Percentage of Tier 1 suppliers' factories audited in calendar year 2020 ⁴
87%	Percentage of audits that were unannounced (apart from initial preproduction audits)
1206	Number of audits in calendar year 2020
0.45%	Percentage of non-compliances related to ILO forced labour indicators in calendar year 2020 ⁵
0.33%	Percentage of non-compliances related to ILO forced labour indicators where were resolved in calendar year 2020
15	Number of incidents of unauthorised sub-contracting

⁴This figure is lower than in previous years as we were prevented from conducting audits in line with our policy on auditing 100% of sites annually, due to Covid restrictions and lockdowns. Restrictions also meant that when we were allowed and able to travel safely, we could not conduct unannounced audits as this would have meant putting our teams and factories at risk.

⁵We updated our methodology in 2019 on how we measure this indicator. We have moved from a narrow definition of non-compliances related to the Employment is Freely Chosen clause of our Supplier Code of Conduct to a broader range of indicators in recognition of the complex and compound nature of forced labour risks.

Training and awareness raising

Helping employees and suppliers be more aware

Training and awareness-raising programmes are important to help guide decision-making within our business and our supply chain be more aware of the risks related to modern slavery and the steps they can take to prevent these risks. We deliver training through dedicated training seminars for suppliers and workers and through specialised programmes designed to promote awareness and mitigate and prevent risks.

Despite the restrictions due to Covid-19, we continued to provide face-to-face training where we were able to do so safely, while some other training was conducted virtually. Our training covered a wide range of issues including grievance mechanisms, our updated Supplier Code of Conduct, health and safety during Covid-19, and forced labour. A full breakdown of training by region, topic, participant is included below⁶.

My Journey

'My Journey' is a training and awareness programme focussed on modern slavery and forced labour in South India aimed at factory management. The region is a hub for spinning and fabric mills and many workers migrate there from different regions across India. Workers in this region, both local and domestic migrants, have been identified as vulnerable and at risk of forced labour.

Recruitment and hiring practices are a key source of these risks. The My Journey programme aimed at building the understanding and capacity of middle management in factories to manage this risk and has been running since 2019.

The programme training curriculum is based on three 'golden rules' of hiring and recruitment: (i) workers should not pay any fees, (ii) workers must be given accurate information and (iii) factories must be comfortable that all workers have been recruited of their own free will and not under duress.

The golden rules were developed in response to our work with factory management teams that indicated factories often have very limited awareness of these risks and how to mitigate them.

Participants in the training represent a cross-sector of departments involved in recruitment and hiring including human resources, factory production, senior and general management, and administration. The added value to this approach is that factories see the benefit of coordinating and streamlining recruitment and hiring processes across departments.

In 2020, we introduced a new training module designed to strengthen participants' understanding of the link between the golden rules and the ILO Indicators of Forced Labour. The ILO indicators represent the most common signs or "clues" that point to the possible existence of a forced labour case and were designed by the ILO to help labour inspectors, trade union officers, NGO workers and others to identify persons in forced labour.

The module explains the indicators in practical terms that are relevant to a factory environment in South India and are delivered in the local language, Tamil.

To reinforce the indicators with real life scenarios we use illustration-based discussion methodologies. We have also adapted the curriculum for virtual training to ensure we were able to deliver the programme virtually during the pandemic.

Post-training follow-up with factories has begun and our team is starting to see strengthened policies and procedures and practices in the participating factories, for example:

- The introduction of appointment letters in additional languages based on migrant populations
- 'Job Seeker Identity Cards' for anyone entering the factory premises in the recruitment process to mitigate the risk of undocumented workers
- Appointment letters given to workers on the first day of joining rather than a week after starting.

"We had a doubt from the start of this training that who is controlling whom? Due to labour shortage, we thought how can Forced labour happen? But after training I have a different opinion. Yes FL indicators does exist in different forms and we should be very alert and try reduce the risk."

- Factory Manager

⁶We have implemented new systems to monitor and analyse training and the data provided covers January-October 2021.

Training & Awareness Raising 2020/21

Global Training Data 1st Jan 2021 - 7th October 2021

Table 1: Training delivered, by regional breakdown

Region	Total hours of training	Training delivered by Primark	Training delivered by external partners	No. of Participants (see breakdown of participants in Table 2)
Global	20	0	20	117
China	270	260	10	4,393
SEA	10	10	0	297
India & Sri Lanka	290	177	113	1,444
Bangladesh & Pakistan	575	93	482	20,916
Turkey and Eastern Europe	24	18	6	210
Western Europe, Africa & America	7	7	0	91
Total	1,196	565	631	27,468

Table 2: Training delivered, by participant

Training delivered by	Total hours of training	No. of participants*	Participants			
			Primark internal teams	External partners	Suppliers and factories**	Workers
Primark	565	7,206	298	219	5,305	1384
External partners	631	20,262	135	0	1,563	18,564
Total	1,196	27,468	433	219	6,868	19,948

* Number of participants includes both trainings delivered to internal Primark colleagues and external audiences.

**Suppliers and factories are represented at a company level rather than the number of individual participants from those companies.

Table 3: Training delivered, by topic

Top 10 training topics - by number of participants	% of total participants trained	Top 10 training topics - by training hours	% of total training hours delivered
1. Grievance Mechanism	68%	1. Grievance Mechanism	18%
2. Code of Conduct Overview	13%	2. Code of Conduct Overview	13%
3. Health and Safety (COVID-19)	3%	3. Health and Safety (COVID-19)	13%
4. Environmental Traceability	3%	4. Forced Labour	9%
5. Gender	3%	5. Worker Health and Wellbeing	8%
6. Chemical Management	2%	6. Gender	8%
7. Worker Health & Wellbeing	2%	7. Social Audit Requirements	8%
8. Health and Safety	1%	8. Environmental Traceability	7%
9. Forced Labour	1%	9. Chemical Management	4%
10. Social Audit Requirements	1%	10. Health and Safety	3%

Stakeholders and partnerships

Working with stakeholders to increase leverage and improve standards

Engaging and partnering with relevant stakeholders helps us to increase our leverage, understand and prevent the risks in our business and provide remedy where relevant. This includes engaging with policy makers, worker rights organisations and civil society groups and actively participating in multi-stakeholder and industry initiatives both at a national and international level.

This year, this has included:

- **Endorsing the Garment Sector Call to Action** convened by the IOE, ITUC and ILO which aims to protect workers' income, health and employment and social protection.
- **High risk and conflict-affected areas.** Engaging with UK Government, the Ethical Trading Initiative, other brands, and experts on due diligence has helped guide and inform our approach to due diligence in relation to from conflict-affected and high-risk areas including Myanmar and China.

Our partnerships

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

Ethical Trading Initiative (ETI), Partnership for Sustainable Textiles (PST), Business for Social Responsibility (BSR), Sustainable Apparel Coalition (SAC), Business Fights Poverty, Social Accountability International (SAI), Institute for Human Rights and Business (IHRB), SHIFT.

2020 Spotlight

Since the incredibly challenging and sensitive developments in Myanmar in 2021 Primark has worked closely with the ETI to understand the requirements of company responsible business conduct due diligence including how to assess the human rights harms linked to the export-orientated garment sector, and the impacts of a withdrawal at a sectoral level. Primark supported the ETI in commissioning an expert study in May 2021 to understand the impact of the coup on workers and is further supporting the commissioning of a sectoral human rights impact assessment on due diligence in Myanmar, in line with the UNGPs and OECD guidelines.

Primark also continues to consult with experts on human rights and the UN Guiding Principles including SHIFT and the Institute for Human Rights and Business (IHRB) to inform its approach.

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

Cotton Campaign Pledge, ILO-IPEC, ILO-IPEC Child Labour Platform, Impactt, Anti-Slavery International, ETI, SAVE, MUDEM, CYDD, The Centre (CCR-CSR), Business Against Slavery Forum, SHEVA, SHIFT.

2021 Spotlight

Through our ongoing partnership with The Centre (formally the Center for Child Rights and Corporate Social Responsibility (CCR CSR) we initiated and developed an extensive training curriculum for young workers in the supply chain. The curriculum was co-created with input and engagement from our global team to make sure it was appropriate to the local context and it comprises six modules child rights and workers' rights, health and safety, rights to education and financial literacy, and it is available in five languages. The Centre ran five training sessions to train our global team on how to deliver this training to young workers.

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

Bangladesh RMG Sustainability Council (RSC), International Accord for Health and Safety in the Textile and Garment Industry, Action, Collaboration, Transformation on Living Wages (ACT), ILO Better Work, Industry Summit, SAC, SAI, Myanmar Centre for Responsible Business, Impactt, Mott McDonald, PST, ETI, Elevate, TRN, TUV SUD, Innovatus, UL, NUK/SCIB, Call to Action.

2021 Spotlight

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

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

Foreign Commonwealth & Development Office (FCDO), UN Women, SEWA, CottonConnect, BSR (HERproject), ACEV, ACT, Women Win, Carnstone, SHEVA, St Johns Medical College, Elevate, Naz Foundation, Girl Determined, Palladium, REEDS, SMART, Solidarity Centre, TMSS.

2021 Spotlight

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

Community organisers train peer volunteers in the local community who help workers enrol and take advantage of the schemes.

During the pandemic PASS was reoriented to support the needs of the communities, raising awareness of health and safety measures, providing support for migrants returning to their hometowns, access to social security benefits, and distribution of food and supplies.

SAVE also reached out to 1500 workers in the local community to create awareness about government financial relief for those who had lost their jobs because of the pandemic.

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

St John's Medical College, SEWA, CottonConnect, Business Fights Poverty, BSR, FCDO, MUDEM, Girl Determined, SAVE, Naz Foundation, Care International, Women Win, Girl Determined, Better Work, ETI, TMSS.

2021 Spotlight

In 2019, Primark launched 'My Life' in Myanmar with Women Win and Girl Determined. As Covid-19 brought an increased risk of gender-based violence and harassment (GBVH) to communities, the project was re-oriented and focused on educating former factory workers on GBVH. The programme has given women an opportunity to learn how to deal with GBVH and how to support their community in coping with such issues in the future. Women involved in the programme received training to become facilitators and once they are fully trained, there are plans to encourage factories to re-hire these workers so that they can support the factory in developing its own effective GBVH strategy.

Traceability and Transparency of supply chains

Our [Global Sourcing Map](#) shows the first-tier production sites which make Primark's products. The factories featured on the map are Primark's suppliers' production sites which represent over 95% of Primark products for sale in our stores. Production sites are included once they have worked for us for over one year.

We include the factory name, address, the number of workers and the gender split. Information from the Global Sourcing Map is accessible as a PDF to download. The map is updated twice a year. Improving the transparency and traceability of our supply chains is a key priority to understand and address the risks of modern slavery.

- **Finished goods:** we have full visibility of all the Primark approved first-tier production sites that make our products.
- **Fabrics and yarns:** we have mapped the fabric and yarn spinning mills within our supply chain and conduct traceability audits on selected mills to confirm the source of their cotton. We are observer members of the Responsible Sourcing Network Initiative Yarn Ethically and Sustainably Sourced (YESS) which helps inform our approach to traceability.
- **Raw materials:** Cotton is the main fibre used in Primark's garments. The Primark Sustainable Cotton Programme provides traceable cotton fibre through a farmer focussed programme.

Sustainable cotton

In total, more than one in four cotton garments sold by Primark is now made from more sustainably sourced cotton and we are committed to increasing this under our 2021 sustainability strategy Primark Cares,

- **2013** We launched the Primark Sustainable Cotton Programme which improves farmers' livelihoods and helps to protect the environment and the communities in which it is grown. Working with CottonConnect and local implementing partners on the ground in farmer communities, we can help farmers grow and produce more sustainable cotton which is then traceable within our supply chain.

- **2019** We announced our goal to increase the number of farmers trained through the programme to 160,000 by 2022 across India, Pakistan, and Bangladesh.
- **2021** We set ourselves new ambitious targets.

By 2027 all cotton in our clothing will be organic, recycled or sourced from our Sustainable Cotton Programme, and our programme will train farmers to use more regenerative agriculture practices by 2030.

Addressing the risk of modern slavery in the Primark Sustainable Cotton Programme.

- Country and regional-level labour risk assessments are conducted by CottonConnect against the CottonConnect REEL Code.

CottonConnect launched its REEL Code in 2010 following a comprehensive programme of risk analysis, stakeholder consultation, staff training and a pilot project among farmers in Gujarat, India. It was revised in 2016 to strengthen its social criteria on employment conditions and health and safety and was revised again in 2021, to include recommendations from a survey conducted with farmers and implementing partners, a review of the sustainable cotton indicators, and enhanced health and safety for cotton gins, and region-specific customisations.

Purchasing Practices

ACT on Living Wages

In 2021 we committed to pursuing a living wage for workers in the supply chain by 2030 under our Primark Cares strategy. We also recognise the role that purchasing practices play in enabling suppliers to pay a living wage. As a founding member of Action, Collaboration, Transformation on Living Wages (ACT) we have publicly stated our commitment to ensure that our "purchasing practices support long term partnerships with manufacturers which enable and reward their progress to paying living wages".

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

The ACT Commitments

- **Wages as itemised costs.**
- **Fair payment terms.** We are signatories to the UK Government Prompt Payment Code and our payment terms are set at 30 days.
- **Better planning and forecasting.** We are committed to increasing our focus on forecasting and planning to provide suppliers with greater certainty on volume commitments so they can plan with confidence. This will play an important role in underpinning our transition to a Living Wage.
- **Training on responsible sourcing and buying.**
- **Responsible exit strategies.** We implement the ACT Responsible Exit Policy developed in 2019/20. Our Sourcing team conducts dependency reviews with suppliers and factories to indicate relative dependencies and risks on both sides, giving our supply chain partners an opportunity to mitigate any impacts where required.

ACT members track and monitor their progress against ACT commitments and their actions. We have conducted internal and external surveys across our buying and merchandising team and our suppliers (postponed from last year due to the pandemic) and we are currently analysing and reviewing the results.

Improving commercial practises to support our suppliers

In addition to the purchasing practices commitments under ACT, we support first-tier suppliers through the following measures which aim to incentivise good labour practices.

- We build long-term partnerships with suppliers. Our oldest supplier has worked with us for over 23 years and the majority have supplied Primark for over six years.
- Our supplier balanced scorecard system was developed by Primark Sourcing team and is used by sourcing and buying teams to track and monitor how well suppliers are meeting our standards on quality, delivery and ethical trade including the Code of Conduct. Ethical trade is one of the highest weighted KPIs.
- We have standard terms of trade that we apply to all our suppliers, fairly and equally.

- We often use off-season factory time for production. This lengthens the lead time and helps a factory to plan its production more effectively and provide stable employment in typically low seasons.
- In general, we do not insist that suppliers use nominated fabric and sundry suppliers, which allows suppliers to remain flexible and cost-effective. The exception to this is in the Primark Sustainable Cotton Programme, where supply chain intermediaries are nominated to ensure traceability.
- Our ETES team of over 130 local experts, based in ten of our major sourcing countries provide support, guidance, and assistance for suppliers to meet our standards.

Freedom of association and worker representation

We acknowledge and support the enabling right of freedom of association so that workers are aware of and can exercise their fundamental rights at work, and the role of legitimate trade unions in achieving mature industrial relations and addressing labour disputes and grievances.

Our Supplier Code of Conduct sets out the standards we expect of our suppliers in relation to freedom of association and collective bargaining agreements.

We monitor and track alignment with the Code, looking at whether the site has a trade union or worker representation and how many workers are covered through collective agreements by a trade union or other means. We require factories to supply documentary evidence, such as a copy of collective bargaining agreements, a list of committee members and minutes of meetings, election procedures, and registers of any grievance or suggestion boxes during the audits that we conduct as part of our factory level due diligence.

Our commitment to freedom of association is demonstrated through our membership of ACT on Living Wages (ACT). ACT is an agreement between 20 large brands and retailers and IndustriALL Global Union. ACT aims to achieve living wages for workers through collective bargaining at industry level, freedom of association and responsible purchasing practices.

Ensuring that manufacturers, employer representatives, trade unions and brands are at the same table is the cornerstone of the ACT model. This model has been critical to achieving agreements on freedom of association and dispute resolution both before and during the pandemic, where issues of health and safety, wages and freedom of association became more severe.

“Supply chain social dialogue structures established through ACT prior to the pandemic have created an important platform for keeping communication open to share information and work towards joint solutions.

This does not mean that joint solutions come quickly – or are always found. But without such structures, any joint action would potentially be impossible. Covid-19 has demonstrated not only the necessity for such dialogue structures but also the need to strengthen them”.⁷

ACT currently operates in four key countries – Bangladesh, Cambodia, Myanmar, and Turkey. Countries were selected based on sizable sectoral production with considerable presence of ACT members and the potential for trade unions to engage in collective bargaining at industry level.

Myanmar

The human rights context in Myanmar continues to be extremely challenging because of the pandemic and political developments in 2021. Structures already established between Myanmar trade unions, employers and ACT member brands enabled ACT to develop and implement negotiated agreements for the protection of workers, trade unions members and representatives, and suppliers. These are:

- **The Fast-track Dispute Resolution Mechanism (DRM)** (2021) in respect of workers’ right with the Industrial Workers Federation of Myanmar (IWMF) aims to resolve labour and human rights disputes in a fast and efficient manner. It contains specific procedures for raising a case, mediation where cases are not resolved, implementation of outcomes, and reporting and communication of the case.
- **The ACT Framework for Responsible Suspension of Orders in Myanmar** (2021) seeks to prevent and mitigate potential impacts upon workers and factories resulting from loss of orders from ACT member brands.

- **The ACT Framework on Workers’ Safety and Termination** (2021) seeks to protect the rights of workers who have been absent for work due to safety reasons. Allegations of breaches can be raised through the Myanmar Fast-track DRM.
- **The Myanmar Guideline on Freedom of Association** (2019) The guideline covers the right to freedom of association and how it is applied within the workplace including the process for constructive social dialogue, release and facilities for trade union activities, dismissal procedure, collective bargaining mechanism and negotiation process, principles on strikes, lock-out and picketing, overall standards of conduct, and dispute resolution. Training for suppliers on the guideline was provided by ACT in 2020.

Bangladesh

In Bangladesh, ACT hosts one of the country’s key garment industry platforms with representatives from trade unions, brands and employers, Representatives from the Bangladesh Garment Manufacturers and Exporters Association (BGMEA), IndustriALL Bangladesh Council, IndustriALL Global Union and ACT member brands are members of the working group which sets the agenda for the platform. The Bangladesh platform is in dialogue on wages, freedom of association and responsible purchasing practices.

In 2020, the platform implemented a Dispute Resolution Mechanism (DRM) initially to address issues arising from challenges due to the pandemic. The DRM is currently being reviewed by an independent expert with an aim to implement learnings and scale-up in 2022. In 2020 at the height of the Covid-19 pandemic, industry, brand, and trade union members collaborated to proactively identify and address cases in which workers did not receive their wages on time. The BGMEA, brands and trade unions compared data to jointly identify any issues and collectively respond.

Cambodia

ACT members have been in consultations with key stakeholders in Cambodia since the beginning of ACT. Discussions with the Garment Manufacturing Association in Cambodia (GMAC), ACT suppliers and trade unions in the country have shaped the overall ACT approach. The development of the ACT purchasing practices and accountability and monitoring frameworks have benefitted from large consultations with stakeholders in Cambodia.

⁷ <https://actonlivingwages.com/2020/12/11/covid-19-to-living-wage-act-2020-update/>

Turkey

ACT has established a dialogue platform on implementing ACT commitments in Turkey. Through this platform, members are in the process of developing an Annex to the ACT MoU on respect and the exercise of Freedom of Association in Turkey that will provide further clarity on how ACT members respect and carry out due diligence on FOA within the Turkish context.

Outside of ACT, Primark engages and works directly with trade unions and other relevant stakeholders to resolve specific issues and grievances. In some cases, we have sought the involvement of national Arbitration Councils, the ILO, and multi-stakeholder initiatives including the ETI.

In 2020-2021, in Myanmar for example, we worked closely with local labour groups and workers to reach a negotiated solution that was satisfactory to workers.

In South India, we are working closely in collaboration with other international brands in a case where allegations of non-payment of wages were raised by the local union.

We participate in programmes such as ILO Better Work and ETI Social Dialogue which strengthen and build the capacity of workers and management to understanding apply mature industrial relations and social dialogue. More information on these programmes is in the table on worker and community programmes on page XXX.

Responsible Recruitment

Recruitment and hiring practices

Recruitment and hiring practices are one of the most common ways in which workers in all sectors can be exploited and at risk of modern slavery. We work to address this through the following measures:

- We support the ‘employer pays principle’ which means that no worker in our supply chain should pay for their job, and that any costs associated with their recruitment must be paid for by the employer.

This is stated in our Supplier Code of Conduct.

- The Code permits suppliers to use agency and contract workers provided they are afforded the full rights as set out in the Code.

- We may conduct additional due diligence assessments on suppliers that hire migrant and contract or agency workers as these groups can be more vulnerable to recruitment practices that may result in forced, indentured, and bonded labour.
- If recruitment fees are identified as having been paid by workers, suppliers are expected to provide remedy in the form of reimbursement of fees to workers.
- We do not source from supply chains with severe risks of forced labour including through recruitment practices, and where we are unable to conduct due diligence in full.

Agency and Labour Providers

In 2019 we began a programme of heightened due diligence on agency and labour providers in production, logistics providers, warehouses, and recyclers across key countries in Western Europe, including the UK, and North Africa.

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

This included embedding additional key indicators into our audit programme specifically on agency labour, including for example, provision of PPE, transport and accommodation for agency workers, charge rates and types of contracts and service level agreements used, whether CBAs differ for temporary workers, whether temporary workers have access to grievance mechanisms. These key indicators were transposed into questions for workers in multiple languages. We implemented a vulnerability threshold trigger where issues were identified and provide tailored remediation and capacity building support.

We are monitoring the impact of the programme and increasing the volume of site visits throughout the first half of 2022. Our next phase following this will be to train and support factories to reduce risks through improved management of labour providers.

Helping workers and communities understand their rights and the risk of modern slavery

It is important for us that we help workers to understand both their rights and the risks of modern slavery.

- We require that all our suppliers' factories communicate the Supplier Code of Conduct to all employees, and that all worker contracts are in their own language.
- We implement programmes for workers to help them understand and exercise their rights and focus on those who may be more vulnerable. We know that partnering with local experts on the ground is important if we are to develop effective programmes built around the needs of the workers that deliver the right impact.
- Many of our partners are grassroots civil society and development organisations and these partnerships represent many years of building trusted relationships through our teams on the ground.

Some of our programmes are highlighted on the following pages.

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

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

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

The programme has also helped women to address the resistance they often receive from family members to join factory committees.⁸

Implementation partner: ILO Better Work.



25,431

Workers reached



62

Factories

(5 in Vietnam, 44 in Cambodia, 13 in Indonesia)

ETI Social Dialogue, Bangladesh (2016 – present)

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

Strengthening participation committees is a priority as they are required by law but are not often very effective. The committees are developed by training elected workers and management on key aspects of being a committee member including understanding labour law, handling grievances, problem solving, formal meeting procedures and effective communication, and addressing sexual harassment.

The training includes a course designed for the female members of the committee. This covers issues such as maternity pay, sexual harassment, and wage discrimination as well as developing skills such as public speaking and communication. Participants also map and discuss their perceptions of safety in the workplace on their commutes. Participants often report that their confidence to manage conflicts improves because of the training, both in the workplace and at home. Training was provided virtually through the pandemic to ensure the programme was able to continue.

Implementation partner: Ethical Trading Initiative



25,426

Workers reached



15

Factories



960

workers trained since 2016



530

workers trained in 2021

⁸ <https://betterwork.org/wp-content/uploads/2020/01/SHP-Thematic-Brief.pdf>

My Life, India (2017 – present)

My Life in South India supports factories to train workers on basic life skills including health and safety in the workplace, rights and responsibilities, communication, and teamwork. The training is particularly targeted at female and migrant workers and is delivered through a 'play-based' approach which uses interactive activities to help workers engage and learn. In 2018 we worked with our partners to further scale the project by launching a 'Train the Trainers' module, where each participating factory nominates staff to become 'My Life Trainers'.

Covid-19 and the ongoing lockdowns in India during the year significantly interrupted delivery of this programme as face-to-face training is integral to its methodology.

In 2020-21 we piloted online training with some success and continue to adapt and plan for the future.

Implementation partners: Women Win, Naz Foundation.



8,865

Workers reached



12

Factories



2393

workers trained

"The greatest change is in the communication. Workers no longer have any fear to ask questions. Previously when they were assigned tasks, they would hesitate to ask information. Now they are more confident, communicate clearly and ask for clarifications and more instructions."

- Factory manager

My Space, India, (2018 – present)

My Space aims to support the mental health of workers in selected factories in South India by building and providing counselling services in factories and building capacity through training factory-based counsellors.

As well as outcomes related to mental health, workers and managers report that the programme has successfully helped to build trust and communication in the workplace. These are fundamental to some of the building blocks of decent work such as social dialogue and use of workplace grievance mechanisms.

During the pandemic, training was provided virtually to ensure the programme was able to continue. A new module was introduced in 2021 for factory managers to help building their understanding of how stress can impact on the workplace and workers.

Implementation partner: St John's Medical College



9049

Workers reached



19

Factories



73

Management staff trained

"If I had not contacted My Space counsellor at the right time, I would have taken some wrong decision in my life."

- Quote from a worker during a training session.

Promising Futures, China, (2018 – present)

The Promising Futures programme for workers in China aims to raise awareness and understanding of China's complex social insurance system among workers and factory management, and support access to social insurance. Social insurance in China includes pensions insurance, unemployment insurance, medical insurance, work-related injury insurance, and maternity insurance.

In some cities, migrant workers are required to enrol into social insurance for several years as a pre-requisite to buying a house or property.

The project utilises WeChat, a social media platform, and online materials, to raise awareness and to promote resources to workers and management.

Online materials include an educational drama and a website on social insurance, which offers information and practical guidance for workers across 13 provinces in China where Primark sources from. Primark has also funded the extension of the website to provide information on additional provinces in China where social security procedures may differ.

During 2020 and 2021, gaining access to Social Insurance was more important than ever before and the programme provided workers with information on applying for unemployment insurance, medical insurance, and job transfers. The project was scaled up from the initial pilot to all Primark Tier 1 factories in China using a combination of train-the-trainer online learning with online materials for workers to access as needed. As the programme rolls out, responsibility for implementation will migrate to suppliers to ensure this is embedded fully in factory management systems.

Primark conducted a worker survey on access to social security during Covid-19 which is helping us to understand the safety net for workers in selected regions in China and identify the gaps between migrant workers and local workers.

Implementation partner: Carnstone



48,212

workers reached, of which
66% were female.



264

Factories

"I've viewed all the articles and videos on the WeChat account; I am a migrant worker from another province, have been working in this factory for many years, hope to buy an apartment nearby.

But I did not join social insurance and has no qualification to buy any house. Since I joined this project, I knew the importance of social insurance and began to buy social insurance and after one year, I will obtain the qualification to buy an apartment. I am so happy my dream will come true.

I only regret why I did not know the benefits of social insurance earlier".

- Factory worker

Microbenefits, China, (2018 – present)

Phase 1: We started to scale up our China CIQ Worker App programme following a successful pilot in 2018.

The pilot indicated improved transparency of human resources practice, better communication between management and workers and enhanced worker awareness of rights. The app also provides a function for workers to raise grievances. Two factories that participated in the pilot since 2018 have continued with the app for the 4th year (with self-funding for the third year). One supplier has self-funded the extension of the app to a second factory in their supply chain.

Phase 2: In 2020 we rolled out the app to ten new factories. Six are implementing project activities in full scale and activities will start in other four factories soon.

Our learnings overall from implementing this project showed that apps (and other tools) can provide an effective method for raising grievances but only if they are supported by effective management systems and processes for handling and resolving grievances.

We conducted a deep dive into effective grievance mechanisms in factories in China to understand this better and provide further information on our learnings on page 31.

Implementation partner: Microbenefits.

Phase 1: (2018 - 2020)



6,000

Workers reached



20

Factories

Phase 2: (2020 - present)



2,085

Workers reached



11

Factories

“The grievance channel the App provides helps us sort out and improve the existing grievance mechanism. We better understand the voice of workers and the dynamics of the factory, so as to better manage and promote the benign operation of the factory.”

- Factory manager

Worker Learning Clubs, China, (2019 – 2021)

The Worker Learning Club project aimed to educate workers on OHS (Occupational Health and Safety), core labour rights and life skills. The clubs were led by Worker Champions who attended a two-day training on awareness and knowledge of OHS as well as skills to operate and manage the Clubs effectively. Worker Champions disseminated learning materials through online platforms (WeChat) to facilitate peer learning.

Gender equality considerations were incorporated including discrimination, sexual harassment, women’s labour rights protection, especially on OHS and job restrictions for female workers.

One factory ran a Safety Month campaign which collected 19 workplace safety improvement suggestions from the workers and a Safety Awareness Quiz which attracted a high level of participation by the workers. The second factory demonstrated a high rate of participation from women workers – among nine worker champions, seven were women, and female workers constituted 60% of the total club members, reaching the programme goal of “at least 50% female participation”.

Implementation partner: Verité



398

Workers reached



3

Factories

STOP Project, Cambodia, Vietnam (2019 – present)

The Enhancing Women's Voice to STOP sexual harassment (STOP) project programme with Care International develops, tests, and adapts workplace models for preventing and responding to sexual harassment. The project supports factories to establish and maintain effective workplace mechanisms to prevent and respond to sexual harassment. The project so far has greatly strengthened workers' and managers' awareness of the issue and their knowledge of how to detect and handle the signs and risks of sexual harassment. Workers were taught to understand internal and external reporting mechanisms on sexual harassment and empowered to act when needed.

Due to Covid-19 disruptions, the programme in Cambodia was partly reoriented to training in communities. In both Vietnam and Cambodia, Care International undertook home-based research to map relevant support and referral services available in the local communities.

Several factories had to downsize production while government restrictions hindered roll-out of project activities in the factories.

Outcomes from the programme included:

- Stronger policies: all participating factories have signed commitment letters on addressing sexual harassment, have developed action plans, and revised their Sexual Harassment Prevention policies
- Operationalising policy: all participating factories have integrated policies into their internal work regulations
- Establishing oversight committees: all participating factories have established functioning Sexual Harassment Prevention Committees to serve as direct focal points to prevent and handle sexual harassment.
- Worker awareness: end-line surveys confirmed that large numbers of workers increased their understanding of sexual harassment and now know how to act and report on it.

Implementation partner: Care International



8,410

Workers reached

Cambodia:



1,326

Workers reached through factory-based training



4,000

Workers reached through factory-based training

Vietnam:



487

Workers reached through factory-based training



2,597

Workers reached through factory-based training

PASS, India (2019 – present)

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

Community organisers train peer volunteers in the local community who help workers enrol and take advantage of the schemes. During the pandemic PASS was reoriented to support the needs of the communities, raising awareness of health and safety measures, providing support for migrants returning to their hometowns, access to social security benefits, and distribution of food and supplies. SAVE also reached out to 1500 workers in the community to create awareness about government financial relief for those who had lost their jobs because of the pandemic.

Implementation partner: Social Awareness and Voluntary Education (SAVE)



3498

Community members reached



2379

Direct beneficiaries from the programme

My Life, Myanmar (2019 – present)

In 2019, building on the positive experience of My Life in South India, Primark launched the programme in Myanmar. However, as Covid-19 brought an increased risk of gender-based violence and harassment (GBVH) to communities, the project was re-oriented and focused on educating former factory workers on GBVH.

The programme has given women an opportunity to learn how to deal with GBVH and how to support their community in coping with such issues in the future.

Women involved in the programme received training to become facilitators and once they are fully trained, there are plans to encourage factories to re-hire these workers so that they can support the factory in developing its own effective GBVH strategy.

Implementation partners: Women Win, Girl Determined.



6,598

Workers reached



3

Factories



122

Workers trained on gender-based violence and life skills



450

Workers received direct support to deal with Covid-19 related crises

Bridging the Gap, Myanmar (2020)

We worked with Impactt, Women Win and their local partner in Myanmar, Girl Determined, to design a programme called Bridging the Gap that was funded by the FCDO under their Vulnerable Supply Chains Facility (VSCF). The programme aimed to address the impact of the COVID-19 pandemic on low income and vulnerable workers in global supply chains tackling the immediate and long-term challenges of supporting employment, livelihoods, and incomes of workers in Myanmar.

The objective was to provide immediate financial support to workers above and beyond their wages, funded by UK aid whilst also leveraging commercial relationships to work with factory management on activities to support women's empowerment in the workplace.

The programme also included a Resilience Fund that was designed to provide local grassroots interventions to support women workers through community engagement.

The programme began with worker engagement through rapid vulnerability surveys and use of the 'Drawing the Line tool' to understand worker's perspectives including issues related to the impact of Covid on their lives and their experiences of gender-based violence.

4,432 workers participated in the vulnerability surveys across 4 factories. 90% of the workers were female.

Unfortunately, due to the worsening situation in Myanmar the project was closed prematurely. However, at that point it had provided cash transfers worth approximately two weeks wages to 1,501 workers, proving a successful innovation in the delivery of emergency financial support in partnership between the public and private sector. The programme had also contributed to financial inclusion for workers through training and access to Myanmar's premier digital payment platform. The programme team engaged in several learning events hosted by the FCDO to share their experiences within and beyond the industry.

For those that received financial support:

97%

of workers reported a positive impact on their financial concerns

100%

of workers reported they were less stressed since the payment

98%

of workers now have access to WAVE money, supporting financial inclusion

1,501

workers have received cash transfer support at two of the factories

"This project will financially help our workers in these difficult times. In addition, empowerment of women in our factories is crucial and important not just for us but also for the society."

- Factory worker

Soromik er Kotha – Worker Voice, Bangladesh (2020 – 2021)

When factory lockdowns due to Covid-19 were implemented and we were constrained in visiting factories and speaking to workers directly, we were able to quickly mobilise a partnership with Microfinance Opportunities (MFO) and SANEM, MFO's local partner in Bangladesh, to remotely recruit and engage a sample of workers across a selection of our key strategic factories in Bangladesh. The aim of the project was to strengthen worker voice through an understanding of workers' views and experiences in the workplace.

The project was modelled on the Global Worker Diaries project in Bangladesh and closely followed valuable information generated by the programme, where workers respond to a series of questions asked repeatedly over a defined period to enable understanding of their views on a range of areas. Questions spanned topics such as health and safety in the workplace, payment of wages and bonuses, and retrenchment. Workers were recruited to the project via community networks and paid for their time. Factory managers were not informed of the programme to ensure the anonymity of workers and complete independence of the project. Although the project has ended, Primark will continue to engage with the participating workers to collect information on their experiences and perspectives on the workplace.

Implementation partners: Microfinance Opportunities and South Asian Network on Economic Modelling (SANEM).



400

Workers reached

Seth Yerng – Our Rights, Cambodia, (2021 – present)

Seth Yerng is a worker app programme delivered in partnership with the Deutsche Gesellschaft für Internationale Zusammenarbeit GmbH (GIZ), a German development agency, and other international brands.

The app provides workers with information about the most important labour laws and occupational health and safety regulations in the workplace in an interactive manner. The app also contains a wage calculator to help workers understand how their wages are calculated.

Factory-based trainers are currently being established to help workers in the set-up and use of the app. Trainers will also serve as direct focal point for workers when difficulties or questions arise. Apart from an important learning and awareness platform on labour rights, the app also helps workers strengthen their financial literacy.

A baseline assessment by GIZ of 1,300 workers across 52 factories, five of which produce for Primark, is currently underway.

Implementation partner: GIZ



14,932

Workers reached



21

Direct beneficiaries from the programme

Access to remedy and grievance mechanisms

Effective ways to directly raise grievances

It is important that people and organisations can raise grievances directly with us and alert us to breaches of our standards including any issues of modern slavery. We provide access to grievance mechanisms through several channels:

- Directly through the Customer Service section of our website
- Through our confidential whistle-blowing facility which is available to all employees
- Through the confidential worker interview process.

Interviews with workers are a mandatory part of our ethical trade audit programme and are always held in confidence to protect worker testimony. Where appropriate, we give workers direct contact details for the Primark team so that they can contact us at their own discretion

- Through our direct engagement on the ground with workers through both our ETES team and our expert partners

We investigate all grievances thoroughly, and we do not tolerate any retaliation against those who have raised the grievances and affected stakeholders.

Enabling workers to raise grievances

Operational-level grievance mechanisms operate at the factory or site level and are often the first entry point for a worker or community member to raise concerns⁹.

Our Supplier Code of Conduct was updated in 2020 and requires suppliers to implement operational-level grievance mechanisms. The clause states:

Grievance Procedure

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

⁹ OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector

Within our audit programme, we monitor how suppliers are meeting these requirements. We look at the management systems, processes, and policies, whether the access point is internal or external to the workplace, and who the provider is. The most appropriate type of mechanism will depend on the country and the local context. Factory capacity building methodologies and support by Primark varies depending on business leverage, factory capacity and willingness to implement interventions, and the presence and efficacy of legally required grievance mechanisms. Where we can, we consult with worker representative bodies and adopt a participatory approach to the development of grievance mechanisms.

We have learnt that audit findings in other areas may also indicate weaknesses in an operational-level grievance mechanism. For example, a weak OHS system can be an indication of the lack of proper reporting by workers on OHS issues. We recognise the interdependencies of data generated by grievance mechanisms and audits and the importance of data protection and the safeguarding of workers. We work with our suppliers and third-party partners to this end.

In China and the UK, we conducted a deeper dive into the effectiveness of existing operational-level grievance mechanisms, looking at how they met the UN Guiding Principles indicators on grievance mechanisms. These state that grievance mechanisms should be legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, and dialogue-based. Our findings revealed various issues that demonstrated improvements could be made to established mechanisms in both countries, including the introduction of clearer grievance policies in multiple languages, the development of better awareness campaigns, and an increased focus on management training. The results were discussed with the relevant factories and they have also informed remediation plans, as well as deepened our understanding of what to look for when assessing the effectiveness of operational-level grievance mechanisms.

Supporting workers to access external independent grievances mechanisms

Increasingly, workers also have access to external independent, or multi-stakeholder grievance mechanisms.

These can be particularly effective where there are vulnerable workers and specific risks.

Where possible, we seek to support workers to access these mechanisms often by raising worker awareness of mechanisms to build understanding and trust among workers. In addition to support, we may invest in an existing grievance mechanism or design additional independent mechanisms in partnership with experts.

Country	Mechanism	Provider	Coverage	Scope	KPIs
Bangladesh	Occupational Safety and Health Complaints Mechanism	Bangladesh RMG Sustainability Council	104 factories	OHS	Eight grievances were raised. Issues ranged from discrimination to wages and benefits.
Bangladesh	Amader Kotha Helpline	Clear Voice, Phulki, Elevate	68 factories	Safety and labour issues	17 grievances to date were escalated to Primark. The majority relate to harassment and bullying.
Turkey	ISCI Destek, Worker Support Centre	MUDEM	24 factories which have Syrian workers	Labour rights for Syrian workers in Turkey	In 2021, one case was raised from a worker in a Primark supplier factory involving discrimination of nationality and sexuality.
UK	Your Voice	Primark, Impactt	Ten sites (warehouses, re-processors, logistic providers, and printers)	Labour rights	Eight grievances were raised ranging from health and safety, discrimination and harassment and bullying.
Myanmar	Fast-track Dispute Resolution Mechanism	ACT, IWFM	16 factories	Freedom of Association	Three cases in relation to freedom of association were raised and resolved through the DRM.

Case study: Your Voice

Your Voice was an external grievance mechanism for workers in Primark's UK operational supply chain for workers in warehouses, re-processors, logistics providers and printers. It ran as a pilot from 2019 to 2021. The programme was developed and implemented with partners Impactt and Navex and designed in line with the UN Guiding Principles. The aim of the pilot was to understand how Primark could best support its suppliers to implement effective grievance procedures.

Ten sites participated in the pilot ranging from family businesses to large organisations. During the 12 months the line was operational, 800 workers had access to the helpline and eight grievances were raised ranging from health and safety concerns to discrimination.

Five of the grievances have now been closed.

Most were resolved through improving internal communication channels, which has led to some sites collaborating with industry partnerships such as Stronger Together to ensure best practice and provide multi-lingual support. Other grievances were resolved by building human resource capacity and training across business functions. In sites where multiple grievances were raised, investigations are still on-going.

The project led to:

- Improved dialogue between workers and management by increasing the types of workplace communication channels in some participating sites
- Collaborations between sites and industry partnerships such as Stronger Together
- Clear business cases for sites to invest in training and human resources

The pilot ended in October 2021. In preparation for the closure of the hotline, our partner Impactt drafted feedback and trend analysis to share with the pilot sites to provide learning and guidance. A template was developed to help management communicate the hotline closure to workers, with reference to other internal and external mechanisms they could use to mitigate the impact of the closure. We have also continued to provide open and direct channels to the Primark Ethical Trade team for workers.

We conducted stakeholder consultation with workers, management, and unions (where present in sites where grievances were raised) to identify key learnings.

- External hotlines, such as Your Voice, must be supported by robust internal workplace mechanisms.

- External channels can help workers to raise grievances but delivering effective remedy and long-term solutions requires ownership and capacity within factory's own management systems. Supplier's own grievances mechanisms must be established to provide appropriate forms of remedy.
- External mechanisms can help identify gaps in factory management systems which need to be addressed for them to deliver effective grievance mechanisms.
- Understanding the different needs of each site type is fundamental to creating a functioning workplace mechanism. We experienced various challenges within different site contexts. The capacity of internal or outsourced management functions, such as human resources, the different employment types on site e.g., agency workers and temporary workers, worker demographics, and the nature of existing on-site representation such as unions or worker committees, all need to be considered when providing choice and access to grievance mechanisms for workers.
- Engagement can be measured by establishing trust and confidence with workers. Transparency of the process, including timely communication and management accountability can help to build trust.

Effective communication should start with clear policies and procedure.

For next steps, we plan to:

- Support and strengthen the implementation of effective mechanisms in our supply chain through specialised capacity building and training. We are prioritising implementation in sites identified as high risk through the following criteria: (i) presence of migrant workers (ii) presence of workers on temp/indirect contracts and (iii) outsourced human resources.
- Share best practise guidance with management in the UK operational supply chain based on learnings from the Your Voice pilot and industry recommendations and with advice on tailored procedures to meet different management needs.

Grievance mechanisms to address gender-based violence

Our current engagement on grievance mechanisms to address gender-based violence and sexual harassment (GBVH) includes strengthening workplace committees as formal mechanisms through which issues can be reported, investigated, and remediated. These include STOP in Vietnam and Cambodia and the ETI Social Dialogue programme in Bangladesh.

Given the multiple sensitivities and importance of confidentiality, reporting on gender-based violence and sexual harassment remains a challenge across the world. In a project evaluation of our partnership in Cambodia and Vietnam, Care International reflected that low reporting was due to victims “not being confident enough to report it or not believing that their case is ‘serious’ enough or occurs often enough to report it.”

However, in the past year we have seen a greater number of grievances reported notably in India, Bangladesh, and Turkey. We consider this to reflect progress in transparency and trust within the supply chain rather than a worsening of the situation.

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

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

- Alignment with the UN Guiding Principles on grievance mechanisms¹¹
- Supporting and engaging with existing dialogue structures and, in line with our Supplier Code of Conduct and international conventions, ensuring that we do not replace or undermine the role of legitimate worker organisations.
- Where freedom of association is restricted and where trade unions face significant challenges to carry out their legitimate activity, the aim is to give workers a grievance mechanism where concerns can be raised in confidence
- Tailoring our approach to meet country specific needs and circumstances
- Focusing on where workers are most vulnerable, e.g., refugees, young workers, migrant workers, hostel residents
- Avoiding duplication by mapping and identifying existing and effective mechanisms
- Supporting rather than undermining factory level operational-level grievance mechanisms

Tracking and monitoring grievances

In our Modern Slavery Act statement 2019/20 we committed “to continue to deepen the collection and analysis of our grievance data to help us better understand and respond to specific human rights issues”. We have done this, and now collect gender disaggregated data, the length of time taken to resolve grievances, and how the complainant is informed of the progress.

Data is collated and analysed from a broad range of sources. This reflects the different points of access and channels that are used to raise grievances either by workers directly or those representing them.

- Grievances reported by workers during an audit and / or during confidential worker interviews
- Grievances reported by workers to Primark’s ETES teams in sourcing countries
- Grievances raised by trade unions and worker representatives
- Grievances raised by external independent grievance mechanisms that workers have access to
- Grievances reported by workers to Primark’s programme partners in sourcing countries
- Grievances raised by civil society and campaign groups on behalf of workers

Data on grievances

Grievances 2020/2021	
Grievance Mechanism	
Open / Pending	35
Resolved	27
Total	62

Grievances related to issues of forced labour in 2020/2021	
Open / Pending	13
Resolved	7
Total	20

¹¹ https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf

Providing remedy and investigating allegations

When grievances are raised, we take immediate steps to investigate thoroughly any potential issues of modern slavery and provide remediation while protecting the confidentiality of victims and those affected.

We also work with specialist organisations and civil society partners who are experts in their field, meaning we can draw on their expertise and support quickly as needed.

Wherever possible, we seek to ensure that any provision of remedy is satisfactory to those affected and seek to involve them in the design of the remedy. We regularly share information on our experiences and the challenges of effective remedy within our sector, either directly on our website, through reports to stakeholders and through industry forums such as the ETI and the OECD. Building on our work to collect and analyse data on grievances, we are now developing a framework for tracking and measuring remedy, which we will start to apply from 2021.

Case study: Harassment by male colleagues

Primark identified social media videos posted by a female worker sharing her experience of verbal harassment by male production floor management in a factory producing for Primark. Primark was able to conduct a confidential interview with the worker and followed up with the factory on appropriate actions.

Following an investigation, the managers involved were removed from their positions on the factory floor with disciplinary warnings and sexual harassment training.

A more in-depth investigation was then conducted through confidential interviews with female workers, 80% of which reported suffering verbal harassment from male colleagues.

The factory was required to implement a range of measures including implementing anti-harassment policies, establishing a worker-management committee to provide oversight, providing training for committee members, and raising awareness among workers on the role of the committee and how to raise grievances related to harassment and abuse. Primark has followed up with individual female workers to assess whether these measures have been effective and satisfactory.

During a follow-up visit in June 2021, female workers reported that they were satisfied with the actions taken by the factory management. To date, no further incidents have been identified or reported.

Measuring our impact

Throughout our programme we monitor the coverage and effectiveness of steps we take to address forced labour by tracking the following indicators:

- The impacts of specific initiatives to address highlighted risks
- Supplier training and awareness of forced and trafficked labour issues
- Internal staff training and awareness of forced and trafficked labour issues
- Audit indicators relating to forced and trafficked labour
- Factory non-compliances against our Supplier Code of Conduct
- Actions taken as part of collaborative initiatives to address modern slavery
- Recorded grievances relating to any form of modern slavery
- Advocacy efforts to raise awareness of the risks within our industry

Global risks within the garment sector

Modern slavery is a global issue and addressing it effectively requires coordinated action from all stakeholders including companies, civil society, trade unions, communities, government, and intergovernmental agencies. The following table shows some of the key risks we have identified within the global garment sector as a whole and outlines the steps we are taking to address these risks both directly ourselves and with other partners and stakeholders across the industry.

<p>Agency labour in supply chains</p>	<p>Agency workers are at risk of modern slavery across all industries and sectors. Within the garment sector, many sites that use agency labour in the UK and EU – particularly in the warehousing and distribution sector – have never been required to include agency labour in the scope of their customers’ ethical trade audits.</p> <p>Our actions taken to address these risks:</p> <ul style="list-style-type: none"> – Identifying where agency labour exists in the supply chain – Heightened due diligence on agency and labour providers in production, logistics providers, warehouses, and recyclers across key countries in Western Europe, including the UK, and North Africa. – Regular assessments of workplaces and employment conditions where agency labour is used – Corrective action programmes at individual site level – Face-to-face training for UK suppliers – Ban on sourcing of garments manufactured in the UK
<p>Cotton</p>	<p>In many cotton producing countries, temporary and migrant workers employed by cotton farmers can be at high risk of indentured and bonded labour and child labour.</p> <p>Our actions taken to address these risks:</p> <ul style="list-style-type: none"> – Primark’s Sustainable Cotton Programme for 160,000 cotton farmers by 2022, delivered in partnership with Cotton Connect and its local implementing partners – Mandated that suppliers must not source cotton from the Xinjiang Uyghur Autonomous Region (XUAR)
<p>Cotton from Uzbekistan & Turkmenistan</p>	<p>State-sponsored forced labour within the cotton farming industry exists in Turkmenistan. Uzbekistan has more recently made efforts to eradicate state-sponsored forced labour within its cotton industry.</p> <p>Our actions taken to address these risks:</p> <ul style="list-style-type: none"> – Signatory to the Responsible Sourcing Network Pledge which sets out our commitment to not knowingly source Uzbek or Turkmen cotton – Regular communication to suppliers to ensure this is implemented – On-the-ground checks in spinning mills in Bangladesh and India to assess origin of cotton bales – Engagement with key stakeholders working on policy and campaigns
<p>Forced labour in China</p>	<p>There are widespread and credible reports of Chinese forced labour in the production of goods across multiple sectors and industries including state-sponsored forced labour of Uighur and ethnic minorities within the Xinjiang Uyghur Autonomous Region (XUAR) and other provinces of China.</p> <p>Our actions taken to address these risks:</p> <ul style="list-style-type: none"> – Enhanced due diligence to increase understanding of the risks within the supply chain in China – Zero tolerance on the use of any forced or prison labour – Zero tolerance on the use of any production inputs (covering all tiers of the supply chain and production processes, and all materials) from the XUAR – Zero tolerance on the use of forced labour from XUAR within supply chains in China – Immediate suspension for any sites found using undisclosed subcontracting – Engagement with stakeholders including civil society, governments, brands, industry associations to discuss appropriate routes for remedy and prevention – Training for Primark’s team on the ground on ILO Forced Labour indicators and regional context

<p>North Korean workers</p>	<p>There are widespread and credible reports of North Korean workers being sent by the North Korean government as forced labour across multiple sectors and industries.</p> <p>Our actions taken to address these risks:</p> <ul style="list-style-type: none"> – Zero tolerance of any labour from North Korea – Audits and assessments as part of due diligence at site level to assess for risks
<p>Overtime in Moroccan garment factories</p>	<p>Audits of Primark’s suppliers’ factories in Morocco in 2019 identified that workers were not being paid overtime premiums due to a conflicting interpretation of Moroccan labour law.</p> <p>Our actions taken to address these risks:</p> <ul style="list-style-type: none"> – Primark’s position on the interpretation of the law was clarified by legal consultation and feedback from the ETI – Suppliers were informed and sourcing decisions guided accordingly – Factory policy and contracts were updated to align with the Primark Code of Conduct on overtime and working hours. – Factories are audited and only approved once overtime premiums are paid to workers for the period worked
<p>Spinning mills and factories in South India</p>	<p>Migrant workers including young women can be at risk of modern slavery through poor recruitment, hiring and working practices in spinning mills and factories in South India.</p> <p>Our actions taken to address these risks:</p> <ul style="list-style-type: none"> – Encouraging factories to hire staff which can communicate with migrant workers. Some factories have hired migrant worker coordinators. – Primark’s My Journey programme to address recruitment and hiring practices – Support for various factory-level programmes and multi-stakeholder sectoral initiatives with brands, local and national civil society groups, suppliers, factories and other associated experts and partners
<p>Undocumented workers in Turkey</p>	<p>Undocumented foreign workers in Turkey, including including refugees from Syria, Afghanistan, and other Middle Eastern countries are at high risk of of forced labour and poor working conditions.</p> <p>Our actions taken to address these risks:</p> <ul style="list-style-type: none"> – Monitoring through audits and factory checks at factory and subcontractor level – Corrective action programmes at individual factory level where workers are identified – Partnership programme with expert NGOs since 2016 to provide support and remedy for any undocumented refugees and foreign workers – Suspension of all factories suspected of using undisclosed subcontracting
<p>Factory terminations during Covid-19</p>	<p>Workers who were terminated without proper legal process during the outbreak of the COVID-19 pandemic could be at increased risk of forced labour.</p> <p>Our actions taken to address these risks:</p> <ul style="list-style-type: none"> – Engagement with trade unions and suppliers – Monitoring factories alignment with the Supplier Code of Conduct legal requirements on providing workers with notice – Corrective action programmes at individual site level including appropriate severance pay for affected individuals – Engagement with international brands and stakeholders to discuss collaborative efforts