

Primark

TICKER
LON:ABF

MARKET CAPITALISATION
US\$20.64 billion

HEADQUARTERS
United Kingdom

DISCLOSURES

UK Modern Slavery Act: [Yes](#)

California Transparency in Supply Chains Act: Not applicable

Australia Modern Slavery Act: Not applicable

OVERALL RANKING

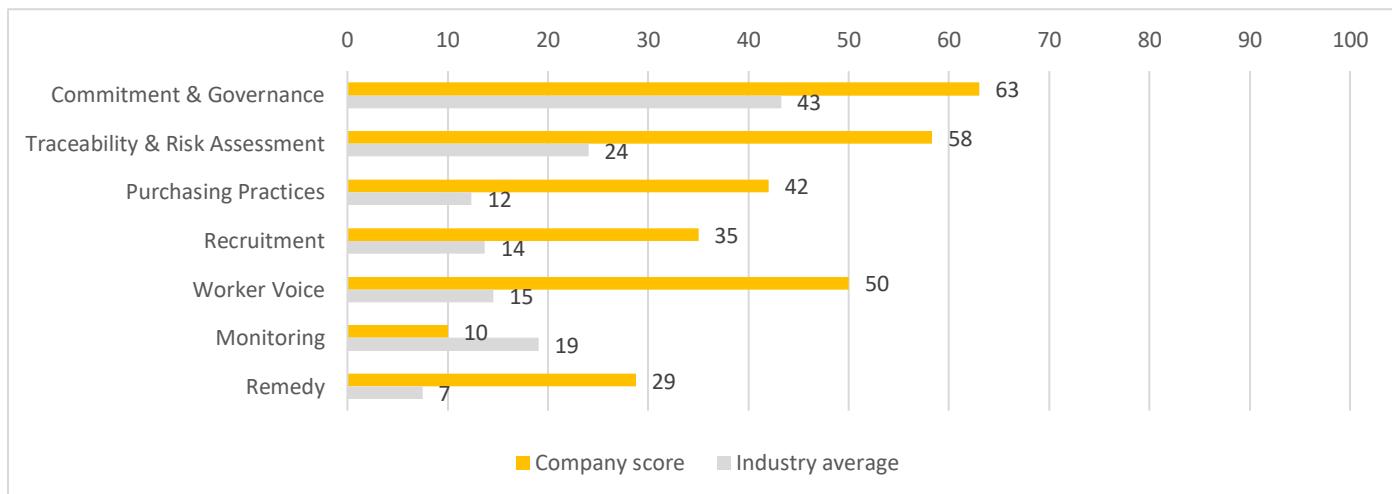
7 out of 65

[2021 Rank:](#) 5 out of 37

OVERALL SCORE

46 out of 100

THEME-LEVEL SCORES



KEY DATA POINTS

FIRST-TIER SUPPLIER LIST
Yes

RISK ASSESSMENT
Yes

DATA ON PURCHASING PRACTICES
Yes (one data point only)

ENGAGED WITH KNOWTHECHAIN²
Yes

NO-FEE POLICY
Yes (Employer Pays Principle)

REMEDY FOR SUPPLY CHAIN WORKERS
Yes

HIGH-RISK RAW MATERIALS¹
Cotton, viscose, wool

SUMMARY

Primark, one of the UK's top clothing and footwear retailers,³ ranks joint 7th out of 65 companies. Since 2021, the company improved on the themes of Commitment & Governance, Worker Voice, and Remedy. In particular, the company joined the pilot [Employment Injury Scheme](#) in Bangladesh, and disclosed new remedy outcomes for supply chain workers including ensuring payment of unpaid wages and benefits. However, the company did not improve across other themes. As such, the company's rank has dropped by 2 places.⁴ Notably, the company is one of the two highest-scoring UK companies in the benchmark and among those scoring highest on the theme of Purchasing Practices.

KnowTheChain identified one allegation of forced labour in the company's supply chains, related to alleged Uyghur forced labour. The company discloses engagements with governments and with groups representing rightsholders, as well as a ban on sourcing from the Xinjiang region. However, the company does not disclose the steps it has taken to address the risks of alleged Uyghur forced labour across raw materials and supply chain tiers.

The company has an opportunity to improve its performance and disclosure on the themes of Traceability & Risk Assessment, Recruitment, and Monitoring.

LEADING PRACTICES

Risk Assessment: Primark is the only company to achieve a full score on the indicator of Risk Assessment. The company outlines detail on the sources used and stakeholders engaged in assessing and identifying human rights risks in its supply chains, and discloses detail on the risks identified across the tiers of its supply chains, including: forced labour risks for migrant workers, including young women, in spinning mills and factories in South India; workers in North Korea and China; undocumented workers in Turkey; risks of unpaid overtime in Moroccan garment factories; risks in specific recruitment practices in India, and risks for workers hired through agencies and labour providers in the UK and Western Europe.

Freedom of Association: The company has joined the pilot [Employment Injury Scheme](#) for garment workers in Bangladesh. Primark is also a member of ACT (Action, Collaboration, Transformation) which is based on an agreement between global brands and retailers and the global trade union federation IndustriALL on establishing freedom of association and collective bargaining within global value chains and is signatory to the legally binding International Accord for Health and Safety in the Textile and Garment Industry.

OPPORTUNITIES FOR IMPROVEMENT

Traceability & Risk Assessment: While the company discloses a first-tier supplier list covering 94% of production and raw material sourcing countries for 38% of its cotton, it is encouraged to disclose the names and locations of below-first-tier suppliers as well as raw material sourcing countries from which it sources raw materials at high risk of forced labour. The company is further encouraged to demonstrate a strong understanding of its supply chains by disclosing data on its supply chain workforce, such as the percentage of migrant workers, and the percentage of workers being paid a living wage.

Recruitment: The company discloses a policy that incorporates the Employer Pays Principle, stating that employers rather than workers should bear the costs of recruitment. The company also discloses some information on due diligence measures to assess agencies or recruitment processes in specific supply chain contexts. The company is encouraged to disclose how it ensures the implementation of the Employer Pays Principle through the prevention of fees across supply chain contexts, such as through mapping of migration corridors and labour agencies used by suppliers, specialised monitoring for fees, and evidence of

supplier payment of fees to labour agencies directly. It may also consider steps to ensure that such fees are reimbursed to the workers and/or to provide evidence of payment of recruitment-related fees by suppliers.

Monitoring: The company discloses a monitoring methodology which includes a review of relevant documentation, confidential worker interviews, visits to associated production facilities, and worker accommodation. While the company discloses limited data on non-compliances identified, the company is encouraged to disclose further detail on the results of its monitoring efforts including a breakdown of findings to assure stakeholders it has strong monitoring processes in place. Using worker-driven monitoring (i.e., monitoring undertaken by independent organisations that includes worker participation and is guided by workers' rights and priorities), may help the company further detect forced labour risks in its supply chains.

¹ For further details on high-risk raw materials and sourcing countries, see KnowTheChain's 2023 apparel & footwear benchmark [findings report](#).

² Research conducted through June 2023 or through September 2023, where companies provided additional disclosure or links. For more information, see the full dataset [here](#). For information on a company's positive and negative human rights impact, see the Business & Human Rights Resource Centre [website](#).

³ Fashion United (2022), "[UK Fashion Industry Statistics](#)." Accessed 28 November 2023.

⁴ KnowTheChain's 2022-23 benchmarks use a revised methodology which prioritises a focus on the implementation of policies and processes and the outcomes they result in, as well as integrating a stronger focus on stakeholder engagement. See [here](#) for more information. In addition, the number of companies assessed in the ranking has increased from 37 in 2021 to 65 in 2023.