



## ESG at Retail



Primark is working to make more sustainable fashion affordable for everyone through its Primark Cares strategy.



*A farm in the Primark Cotton Project in India*

Primark's business model is underpinned by its long-standing Ethical Trade and Environmental Sustainability (ETES) programme, which has been a cornerstone for over 15 years. Building on this foundation, in 2021 the business launched Primark Cares, its 2030 vision to make more sustainable fashion accessible to everyone. Through a focus on three key areas, Product, Planet and People, Primark is transforming its operations and supply chain. This includes the design and production of its clothing, the selection of materials, its collaboration with suppliers, and the packaging and shipping of its products.

The Primark Cares strategy is enabled by four key elements: a commitment to ethical trade and human rights set out in its Supplier Code of Conduct and Supply Chain Human Rights Policy; a commitment to reduce environmental impact, articulated through its Environmental Policy; how the business collaborates and innovates with suppliers, stakeholders and partners; and traceability and transparency.

Primark has established a governance framework to oversee ethical trade and sustainability, including its Primark Cares strategy and human rights and environmental due diligence within the supply chain. To effectively understand, manage and mitigate risks, Primark actively engages with a broad range of stakeholders, including policymakers, worker rights organisations, civil society groups, and industry initiatives at both national and international levels.

Please read more about ESG at Primark in the [Primark Sustainability and Ethics Progress Report 2023/24](#).

## Our people - Retail



Primark places its people at the heart of its business strategy. Caring for its people and fostering an engaged workforce is an integral part of the business's ongoing success.



*A colleague at Primark's Oxford Street East store, London, UK*

## Health, safety and wellbeing

Primark is dedicated to providing a safe and healthy work environment for all employees. Its comprehensive health and safety strategy, Safe Today, Safe Tomorrow, drives compliance with regulations, reduces incidents, and promotes a positive workplace culture.

To build a strong safety culture, the business has launched a cross-functional project focusing on fundamental areas of safety management. Teams are actively working on five of these areas as a priority.

Primark's Incident Management System tracks and investigates all incidents and near misses, enabling the business to identify root causes and implement preventative measures.

Primark uses the Group's independent Speak Up platform, a confidential and professional reporting system that encourages employees to raise concerns about health and safety issues without fear of reprisal.

Primark sets health and safety targets for its own operations and conducts regular audits to evaluate its performance and identify areas for improvement.

The business has also implemented measures to ensure the safety of contractors, including contractual requirements and regular training and engagement. In 2024, 192 employees experienced an on-site Lost Time Injury (LTI), representing an increase of 19% from the previous year. This equates to 0.37% of Primark's employees receiving an injury in its retail sites in 2024 compared with 0.34% in 2023.

This increase can be attributed to several factors, including:

- market expansion: the complexities of entering new markets have led to some challenges in ensuring consistent health and safety practices across all locations;
- new colleagues: many employees are new to Primark and require additional training and support to adapt to its safety standards and procedures; and
- legal variations: differences in legal requirements across various markets can present some challenges in maintaining compliance.

In 2023/24, recent structural changes to management in the UK temporarily affected health and safety performance due to the rotation of personnel, many of whom had previous and long-standing responsibilities for health and safety. These changes, however, are anticipated to deliver long-term improvements through enhanced training, clearer roles and dedicated health and safety positions, allowing for consistent focus from the retail market. Also impacting UK health and safety performance was unsafe behaviours particularly around stock handling.

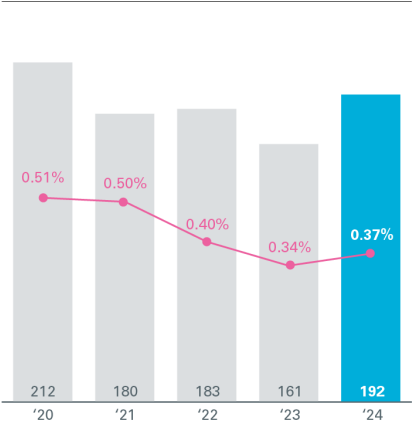
This year, there has been an 8.3% increase in on-site contractor LTIs from 36 in 2023 to 39 in 2024. This increase is attributed to cleaning and security contractors, most notably in Spain. As Primark continues to grow, it remains focused on maintaining the highest health and safety standards. It will continue to invest in safety initiatives, prioritise employee wellbeing and adapt to evolving regulatory requirements.

Wellbeing

Primark has several initiatives to increase the physical, financial and mental wellbeing of its employees. One such initiative is the Spark wellbeing programme created to empower colleagues to become their best selves at work and in life. The programme focuses on the three pillars of Mind, Body and Life. To support the programme, this year, a Wellbeing Champions network was introduced across four markets – the UK, Republic of Ireland (ROI), Belgium and the Netherlands.

Under the Mind pillar, a rebranded Let's Talk Employee Assistance Programme (EAP) campaign was launched in 2024, alongside the introduction of a new provider for the programme in all markets outside the UK and

Employee on-site Lost Time Injuries and Lost Time Injury Rate (%) - Retail



US. The campaign has resulted in a 133% increase in engagement cases in comparison to the same period last year. Mental Health Awareness training has seen an additional 450 Mental Health First Responders trained and certified this year, bringing the total to over 630. Stress Awareness month and May Mental Health Awareness Month were marked with webinars, activities, and information-sharing in conjunction with the EHS team.

Under the Body pillar, Primark offers a range of fitness and nutrition learning options through webinars and events. In 2024, it launched the Primark Summer Series which focused on movement, nutrition and recovery through various events, webinars and activities.

Under the Life pillar, it launched Financial Wellbeing month in September 2023 aimed at providing colleagues with information and support on a number of financial related topics. Work continued on menopause support in the US, France and Italy, alongside a variety of themes including fertility, surrogacy, adoption, baby loss and paternity leave under its family support. While the focus of the majority of the programmes has been ROI and the UK, Primark is working with all markets to understand which similar initiatives can be implemented to support all colleagues.

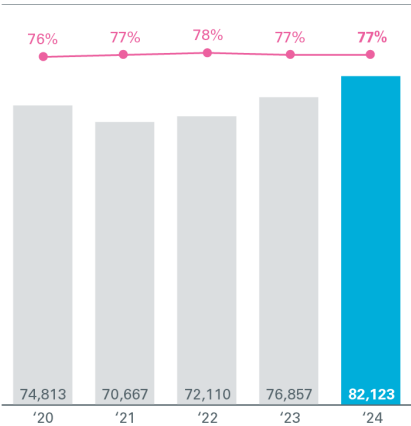
Diversity, equity and inclusion (DEI)

Primark strives to create a welcoming and inclusive environment for all. Its diverse workforce, representing over 176 nationalities and spanning a wide range of ages, reflects its dedication to building a sense of belonging.

Everyone plays a part in embedding diversity and inclusion in the business. To ensure everyone feels represented and has equal opportunities, its Head of Diversity and Inclusion and relevant business partners work collaboratively across multiple markets to develop and implement its DEI strategy. This year, Primark offered training and development opportunities facilitated by external experts, such as inclusion webinars and masterclasses, to enhance understanding and promote inclusive practices.

Its global colleague networks, including LGBTQIA+, Cultural Diversity, Life Stages and Gender, and Disability and Neurodiversity, provide a platform for employees to share experiences and contribute to the Primark culture.

Number of employees, highlighting percentage of women in workforce



## Engagement and development

Primark continues to focus on enabling future growth by investing in its Primark's Early Careers programme to create a talent pipeline for the future. Engaging with students early in their careers allows the business to attract and retain people who can enable continued growth and innovation at Primark.

In July 2023, as part of its Early Careers agenda, Primark welcomed a second cohort of 47 students for their year-long university placements across 13 different business streams. Building on the success of the programme, a third cohort of 40 students joined the business in July 2024 from over 2,250 applications. Students have the opportunity to gain hands-on experience while contributing exciting and inspiring ideas across many work streams. Feedback from both line managers and students is positive, and 21 students who completed their placements have been offered graduate roles once they finish their degrees.

Primark's Your Voice bi-annual colleague survey provides the opportunity to give opinions, feedback and suggestions on areas, topics and actions they wish to have introduced or to influence decisions going forward. In January 2024, over 1,700 leaders from around the world gathered in Dublin for a two-day Primark Connect event. This event was run to elevate key strategic initiatives and showcase the best performance and plans for the future.

## Case study - Primark

### Accessible Primark



*Accessible fitting rooms at Primark's store in Melilla, Spain*

Primark wants to be inclusive for everyone, and that means supporting people with disabilities, chronic health conditions and post-operative or age-related needs.

Primark has implemented various initiatives to make its products, stores and workplaces more accessible:

#### **1. Accessible Products**

Primark launched adaptive underwear in some of its stores across selected markets to support those with limited mobility, with easy access closures. The collection received the Disability Smart Inclusive Product Design award at the Business Disability Forum Awards 2024. Primark plans to introduce more adaptive items and apply inclusive design principles to a wider range of products and has partnered with a renowned adaptive designer, Victoria Jenkins, to expand the range.

#### **2. Accessible Stores**

Primark is partnering with AccessAble to review all its stores and offices in the UK and ROI, in addition to its Islip depot. So far, the business has conducted surveys of 97% of stores and offices. This information will help customers plan their visits and inform its ongoing efforts to create a more inclusive shopping and working environment.

The survey results will be published on AccessAble's website to help customers plan their visits.

#### **3. Culture of Accessibility**

Primark is conducting a review of its policies, processes and communication channels to identify areas for improvement. The business is also working with accessibility specialists to inform its accessibility strategy.

#### **4. Inclusive Representation**

Primark continues to work with talent from the disabled community in its campaigns to promote inclusivity. Primark is creating a guide to future-proof its studio so when models work with them, accessibility adjustments can be made in advance.

## Case study - Primark

### Supporting the LGBTQIA+ community



#### Primark's Northern Ireland team coming together for Belfast Pride

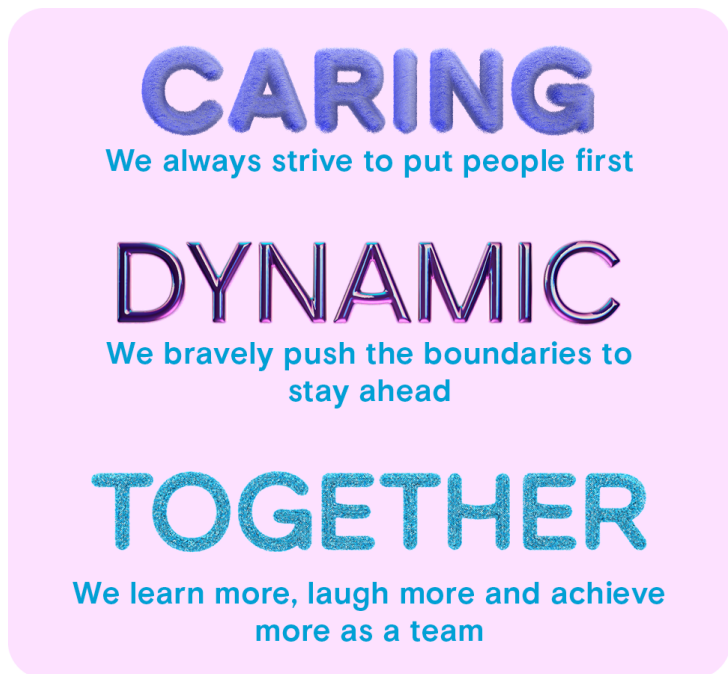
Primark is a proud partner of ILGA World, a global federation of more than 1,800 organisations advocating for the rights of lesbian, gay, bisexual, transgender and intersex people.

This year, the business also collaborated with local LGBTQIA+ charities in its markets. These organisations share its values and are highly regarded by its colleagues.

By supporting these charities through donations and volunteer efforts, Primark aims to not only contribute to its important work but also gain valuable insights and resources that can benefit employees, customers and communities.

## Case study - Primark

### Launching a new values and behaviours framework



*The three values from Primark's Values and Behaviours Framework*

Primark has launched and begun embedding a new values and behaviours framework this year, alongside its new purpose 'to create maximum joy, at minimum cost'.

A key priority is to create brilliant cultures across its global business using the values and behaviours as a key vehicle to make this happen. Created with the involvement of over 300 colleagues, the new values, Caring, Dynamic and Together, plus their supporting behaviours, aim to help build cultures where people feel empowered and inspired to do their best work every day.

The values and behaviours have been launched to around 82,000 colleagues globally and a multi-pronged engagement strategy is in progress. This includes events, communications, toolkits, roadshows, videos, and much more. They are also being embedded throughout the colleague lifecycle, playing a part in onboarding, development, assessment and performance conversations.

## Case study - Primark

### Fifth global Your Voice colleague survey



Primark employees at our store in Bucharest, Romania

Primark's fifth colleague survey was launched in March 2024 as part of its ongoing programme of listening and responding to feedback from colleagues. This bi-annual survey encourages colleagues to share their feedback on a number of different topics. The survey had a participation rate of 80% and over 450,000 comments were received. Primark uses these insights to inform its approach to colleague engagement.

## Case study - Primark

### Investing in retail leadership



*Primark employees at our store in Mulhouse, France*

Primark is investing in its leaders to enhance their effectiveness and impact. The business has implemented several initiatives to support their growth, including a comprehensive onboarding programme for new retail managers to ensure new colleagues have a positive and effective induction. Primark intends to use these insights to inform its approach to colleague engagement.

Primark also has a range of leadership development opportunities focusing on its values, behaviours and leadership skills, equipping managers with the tools and knowledge needed to succeed. These include the Lead Our Amazing Stores programme for store managers which consists of workshops, 360 degree feedback, simulations and one-to-one coaching.

Our My Leadership Impact programme equips department managers with the mindset, skillset and tools to lead our store colleagues. To date, 700 department managers have attended the programme and a further 1,300 department managers will go through the programme before the end of 2024.

## Case study - Primark

### Nurturing retail talent



*Primark employees at our store in Mulhouse, France*

Grow With Us is a career development programme designed to aid employee progression, in order to create a talent pipeline for all retail management levels, from team managers to store managers. The programme builds leadership and operational knowledge for crucial responsibilities through interactive workshops and workbooks, e-learning modules, and on-the-job development challenges and activities. Programmes for each of the four levels of retail management were rolled out in 2024, with 801 participants across nine markets for Primark's Retail Assistant Team Manager programme. There will be further implementation of all programmes across all markets throughout the years ahead.



## People in our supply chains and surrounding communities - Retail



Primark has a long-term commitment to promote decent work in its supply chains.



*A trainee operator in the Sudokkho programme at a Primark supplier factory in Dhaka, Bangladesh*

### Human and labour rights in our supply chains

Primark's [Supply Chain Human Rights Policy](#) outlines its commitment to human rights due diligence in its supply chain, the foundation of which is built on its [Supplier Code of Conduct](#), which sets the ethical standards the business expects of its suppliers.

The Primark Supplier Code of Conduct covers its supply chain including goods for sale and services such as service providers, logistics and transportation. Compliance with the Primark Supplier Code of Conduct is a key condition of doing business with Primark. Primark expects all suppliers to comply with the Code, which includes requirements on labour rights such as health and safety, freedom of association, discrimination and

child and forced labour. It is based on the Core Conventions and the Fundamental Principles and Rights at Work of the International Labour Organization, in addition to the Ethical Trading Initiative's Base Code.

The business takes a risk-based, worker-centric approach to human rights due diligence that makes use of multiple channels of information to set priorities and manage risk. This includes desk-based research, audits, direct engagement with workers and their representatives, as well as engagement in local and international forums. Primark greatly values engagement with a global network of local and international stakeholders, unions, governments and civil society organisations, whose support and feedback are essential to its progress.

Primark's Ethical Trade and Environmental Sustainability team has over 130 people in its 10 key sourcing markets. The team works across all aspects of human rights due diligence, from strategy and risk assessment to supporting suppliers and their factories in implementing its Supplier Code of Conduct.

Primark's social audit and monitoring programme is one of the key elements of how human rights due diligence is implemented in its product supply chains. Through this programme, Primark conducted over 2,000 social audits over the last year. These audits are carried out by Primark's own employees based in sourcing countries, in addition to carefully selected third parties. Primark carries the full cost of these audits, which includes rigorous checks for human rights issues based on first-hand assessment of the working environment, reviews of relevant documentation and confidential worker interviews. At the end of each audit, supplier factories are issued with a time bound corrective action plan that outlines any areas for improvement. Primark uses these audits in the approval process for all new tier one factories. Any potential new factories are audited and only if the outcome of the audit is satisfactory can any orders be placed.

Primark also implements additional due diligence activities where necessary. One example is its Structural Integrity Programme which was established in 2013 in Bangladesh to assess the safety of all supplier factory buildings against international standards. If areas are found to require improvement, it works with the suppliers and their factories, in collaboration with a team of structural and civil engineers from international engineering firms, to provide technical support and guidance. The Structural Integrity Programme has been expanded to Pakistan and Cambodia, with ad hoc support for other sourcing countries as required.

Primark believes it is important that organisations, workers and their representatives can raise grievances and alert the business to potential breaches of standards. Primark is committed to making effective and accessible grievance mechanisms available to all its colleagues and people in its supply chains. This includes:

- having grievance mechanisms which allow for anonymous reporting;
- expecting all Primark-approved factories to have effective grievance mechanisms available to their workers;
- working with third parties, including Non-Governmental Organisations (NGOs), to support the implementation of industry-wide grievance mechanisms in our sourcing countries and support existing ones. An example is the Amader Kotha Helpline in Bangladesh, an external and independent grievance mechanism to provide workers with a confidential and accessible means to raise concerns and access remedy; and
- developing a separate, widely available, Primark-funded grievance mechanism that will be accessible to all workers and relevant stakeholders in its supply chain, called Tell Us.

Primark also receives grievances through other channels, including the customer services section of its website, confidential worker interviews during social audits and workers having direct contact with Primark colleagues and its partner organisations. When issues or grievances are raised, Primark takes steps to

investigate thoroughly while protecting the confidentiality of those raising the complaint, and anyone else who might be affected. Primark does not tolerate any retaliation against those who have raised a grievance and any affected stakeholders.

More detail about Primark's approach to human rights due diligence can be found in its Modern Slavery Statement, Supply Chain Human Rights Policy and Sustainability and Ethics Report.

## Solutions and projects for systemic issues in factories

Where inherent risks and more systemic issues are identified, Primark works with suppliers and their factories, as well as partners and other brands, to address these through longer-term solutions and projects. The first of these projects began over a decade ago, and the portfolio of work continues to grow. Local teams play a key role in working closely with the supply chain and external experts to identify issues, find solutions and share learnings with others. Over the years, Primark has identified several thematic areas to support factory workers in its supply chain, some of which are included in the Primark Cares strategy and are aligned with the activities undertaken as part of Primark's supply chain Human Rights Due Diligence. These include:

- creating financial resilience;
- promoting equal opportunities for women; and
- improving health and wellbeing.

There are currently 36 external partners working across 21 projects to support workers in the garment industry in seven sourcing countries.

For example, Primark recognises the specific challenges faced by vulnerable workers, including migrant workers, and has developed dedicated programmes to support these workers in India which is a key sourcing location for the business. One example is the My Life programme in India, which helps vulnerable migrant workers understand their rights, with a strong focus on women. Primark launched the programme in 2017, partnering with the international NGO Women Win. The programme has been running for over five years and has been adapted to fit local needs, including language requirements. An independent [evaluation by 60 Decibels](#), an end-to-end impact measurement business, confirmed the positive impact of My Life on workers, especially migrant workers, who are some of the most vulnerable. Migrant workers often face challenges due to language barriers, cultural differences and limited access to resources. By equipping them with essential life skills, the initiative is helping to mitigate the risk of abuse and exploitation, helping them to overcome these challenges and build more resilient futures.

Building on these successes, Primark is continuing to engage with stakeholders to expand the programme beyond factories.

## Primark acting on living wages

Primark's approach to pursuing a living wage for workers in its supply chain is focused on industry collaboration through its membership of ACT (Action, Collaboration, Transformation): transparency on wage data and continuous improvement of purchasing practices. Primark's social audit programme also monitors supplier factories' compliance with legal wage requirements.

By embedding responsible purchasing practices<sup>1</sup>, Primark recognises that this will support better conditions to enable suppliers and their factories to pursue a living wage. For example, by identifying and ringfencing the labour cost of a product, Primark will aim to protect wages from price negotiations.

The business has set up a working group, comprising some of its key suppliers and its in-house country teams, to develop a tool to identify labour costs. Primark has also provided training to 320 suppliers and 455 buying and merchandising colleagues on this costing method. Primark continues to train and upskill its product teams on the importance of implementing responsible purchasing practices.

As reported last year, Primark began planning a pilot on wage data collection using the Fair Labor Association (FLA) WageTool to measure the gap between actual wages and living wages. Following consultations within the business and with the FLA, suppliers and factories in Cambodia, Bangladesh, India and Turkey were selected to ensure a broad and diverse pilot, considering workforce size, gender split and length of time working with Primark. 32 factories are now taking part in the data collection pilot. Information from the pilot will be used to compare actual wages paid against the Living Wage benchmark of the Global Living Wage Coalition.

## Transparency and traceability

Supply chain traceability is complex and Primark continues to develop its approach. For the past six years, it has published a Global Sourcing Map, covering tier one factories that make its products<sup>2</sup>, including worker numbers and gender at each site.

Primark's partnership with TrusTrace, which started in 2022, enables Primark to gather data from across its product supply chain, from raw materials through to finished product. This programme is run by a dedicated Transparency and Traceability team operating within Primark's Sourcing team. In 2023/24, Primark reached 100 suppliers and increased the number of raw materials mapped to the four main materials Primark uses: cotton, polyester, man-made cellulosic fibres (such as viscose) and nylon. Primark continues to train suppliers on its traceability expectations.

Traceability is also embedded into the operations of the Primark Cotton Project.

*1. ACT brands have committed to improving their purchasing practices globally in five areas where the biggest impact on wages and working conditions was identified. Read more here: <https://actonlivingwages.com/what-we-do/act-and-purchasing-practices/>.*

*2. Tier one factories manufacturing finished goods. Tier two factories provide materials and services to tier one factories.*

### Measuring impact: supporting vulnerable workers in India



*Factory workers undergoing training as part of My Life*

Primark has developed processes to better understand and measure the outcomes and impact of its initiatives on worker welfare. In recent years, it has developed a measurement and evaluation framework, in line with both global best practices and guidance from [The Shift Project](#), a leading independent non-profit organisation with expertise in the UN Guiding Principles on Business and Human Rights.

This approach has been used to measure the impact of My Life programme implemented in India. This initiative has been designed to address the risks that vulnerable people face, particularly domestic migrant workers and women in factories in Primark's finished goods supply chain. For example, many of these workers have a poor understanding of their rights or what factories should provide, for instance employment documents in a language that they can read and understand. Running since 2017, the My Life initiative equips workers with essential life skills in three key areas: communication skills, knowledge of worker rights and workplace health practices. The training is delivered in an active, participatory and engaging format known as the 'play-based approach' and has been adapted to fit local needs, including language requirements.

An independent assessment of the My Life programme impact was conducted by independent social impact organisation 60 Decibels who surveyed 525 workers. The findings revealed that the programme has positively impacted workers' perceptions across the key areas of communications and rights and responsibilities. For example, 95% of respondents stated that their communications skills had either 'very much improved' or 'slightly improved'. When disaggregating the results from an even sampling by migrant workers and non-migrant workers, the results show bigger improvements for migrant workers. For example, 70% of migrant workers reported their communications skills had 'very much improved' compared to 50% of non-migrant workers. This trend is replicated across various criteria, underscoring the initiative's success in addressing the needs of the most vulnerable workers.

## Case study - Primark

### Prioritising mental health with the Moner Kotha project



*Factory workers undergoing training on mental health in the workplace*

Primark continues to support a programme to improve mental health awareness in five supplier factories in Bangladesh. In partnership with the British Asian Trust and Sajida Foundation, the Moner Kotha ('mind talk' in Bengali) programme has been increasing awareness of mental health issues, building resilience, and providing support for workers in the supply chain through training, capacity building and the provision of mental health information in the workplace.

In the past year Primark continued to roll out refresher training for para-counsellors who are workers or other factory staff who are trained to provide mental health support to their peers and connect more serious cases to mental health professionals. This refresher training focuses on building their skills in delivering counselling in a factory. Primark's partner the Sajida Foundation, which facilitated these sessions, conducted around 350 counselling sessions. The programme has delivered the first round of mental health and wellbeing awareness sessions to 2,500 women.

### Sudokkho – Upskilling workers, empowering women in Bangladesh



*Factory worker undergoing training as part of the Sudokkho programme*

Primark's Sudokkho programme in Bangladesh was developed to enhance in-house technical training capabilities within supplier factories. The programme continues to expand its reach, with new factories joining and existing ones increasing their involvement.

The technical training that Sudokkho delivers has several layers. The foundational level trains factory workers through a dedicated initiative in the factory, where trainees acquire new required skills. The initiative develops and trains assessors who support overseeing the technical standards of trainees on the training line before they enter the main production line. Finally, the Sudokkho technical training includes training existing skilled operators, with a specific focus on women, into supervisors. Its delivery partner, Rajesh Bheda Consulting (RBC) has been collecting data to evaluate the extent to which factories can maintain Sudokkho training without ongoing support and to measure the programme's long-term effectiveness. This includes evaluating factors such as the presence of a dedicated training line, skilled supervisors and trainers who can train others. Encouragingly, several factories have successfully transitioned to self-sufficiency. Since the project began, one factory in a remote area expanded two additional production lines with the help of Sudokkho by upskilling helpers to operators, without increasing their workforce size.

## Carbon and climate - Retail



Reducing its carbon footprint is imperative to Primark meeting its environmental commitments and ensuring it does its part to mitigate the impacts of climate change.



*Solar panels on the roof of a Primark supplier factory, Bangladesh*

## Greenhouse gas (GHG) emissions, energy and renewables

The Science Based Target Initiative (SBTi) has approved Primark's near-term target to reduce absolute Scope 1 and 2 greenhouse gas (GHG) emissions and absolute Scope 3 GHG emissions from purchased goods and services respectively by 50% by 2030 from a 2018/19 baseline. These targets also align with the commitments Primark made through reputable third parties, most notably UNFCCC [Fashion Industry Charter for Climate Action](#) (FICCA) and WRAP's Textiles 2030 initiative.

Additionally, Primark aims to achieve 100% renewable electricity for Scope 2 emissions by 2030, in line with the FICCA. Its strategy and roadmap to meet this ambition is disclosed in its Climate Transition Plan.

Primark has achieved a year-on-year decrease in market-based emissions across Scopes 1, 2 and 3 compared to the previous year of 12%, this is a 1.9% decrease against its baseline.

Primark recognises the broader climate-related risks associated with climate change, including physical and transition impacts. In line with the Task Force on Climate-Related Financial Disclosures (TCFD), Primark has collaborated with the ABF Group finance team and CR Hub to undertake a comprehensive assessment of the material Group risks, with the findings detailed in the ABF Annual Report. The business is now broadening its climate risk assessment and actively integrating climate-related responsibilities more deeply into its governance and risk management framework.

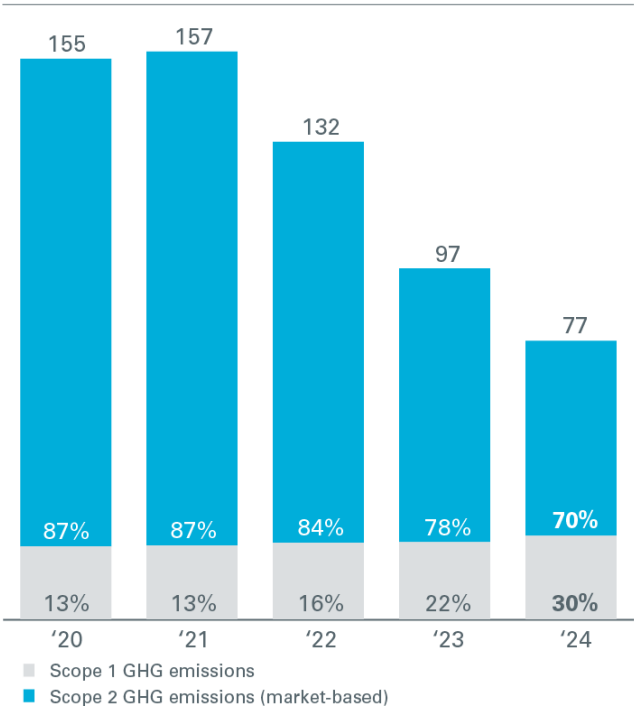
## Scope 1 and 2 GHG emissions, energy and renewables

Primark is committed to reducing its Scope 1 and 2 GHG emissions through rigorous management of its operations. The business's Energy Policy, developed in 2018 and updated in 2022, outlines its approach. Primark's Scope 1 and 2 (market-based) emissions reduced by 21% in 2023/24 compared to 2022/23 and were 52% lower than the 2018/19 baseline. This reduction was achieved through energy efficiency measures in its stores and the procurement of renewable and low-carbon electricity. Considering its planned geographical expansion, Primark expects this reduction to fluctuate in the short-term.

This 52% reduction meets the threshold of Primark's SBTi validated Scope 1 and 2 emissions reduction target ahead of its 2030 deadline. However, Primark knows that with its growth, and renewable power procurement challenges in some markets, the business may drop below the 50% threshold in the short term. Primark is committed to evolving its programmes and strategies to align with its commitments in this space.

The business has established a network of Energy Champions across its operations, who drive energy efficiency in stores, offices, and distribution centres. Over 99% of Primark sites have achieved certification to ISO 50001, the internationally recognised energy management standard. Primark has upgraded to highly efficient LED lighting in 133 stores across 10 markets and the roll-out will continue to additional stores in 2025.

**Scope 1 and 2 GHG emissions**  
(000 tonnes of CO<sub>2</sub>e)



**Scope 3 GHG emissions**

Primark is dedicated to minimising the environmental impact of its products throughout the supply chain. Although it does not own manufacturing facilities, Primark works closely with suppliers to align their practices with its environmental goals.

Primark's total Scope 3 GHG emissions, which represent the biggest portion of its footprint, reduced by 12% in 2023/24 compared to 2022/23 and were 0.6% lower than the 2018/19 baseline. Primark is investing in its Environmental Sustainability Team and in supplier factory efficiency programmes aimed at supporting GHG emission reductions through targeted training, upskilling and energy-saving projects.

Starting this year, Primark now has a requirement for its top 100 suppliers, which includes approximately 79% of its procurement spend for goods for resale for 2023/24, to set science-based GHG emission reduction targets in line with the SBTi and the Greenhouse Gas Protocol. By recognising and rewarding supplier efforts, Primark aims to accelerate progress across those suppliers it works with.

Primark actively sources renewable and low-carbon energy in line with the GHG Protocol Standard and RE100. Despite progress, challenges remain, particularly for stores in shopping centres with limited energy procurement control. By the end of 2024, renewable and low carbon energy power contracts were in place in eight countries, covering approximately 64% of Primark's electricity demand.

Primark is also investing in supplier factory efficiency through targeted training, upskilling and energy-saving projects. This combined approach aims to reduce GHG emissions from both manufacturing and finishing processes.

Primark has recently conducted in-depth energy efficiency assessments of factories in Bangladesh, China and India. Partnering with external consultants, the business has conducted comprehensive audits of energy and water systems across suppliers' factories. These assessments have identified significant opportunities to reduce resource consumption and carbon emissions. By providing thorough reports and hosting workshops, Primark has been helping factories implement effective, business-driven solutions.

In 2023/24, Primark onboarded and assessed an additional 51 factories. Initial assessments in 29 of the factories onboarded in 2023 indicate that potential water and energy efficiency improvements could be made, with an average projected GHG emissions saving of 32% and a total potential water saving of two million m<sup>3</sup> per year for those factories assessed in Bangladesh. The next step involves working with these factories to realise the identified savings. The insights gained from these projects will be scaled up to engage and demonstrate the business case for more factories in efficiency initiatives in the future.

Alongside the work on factory efficiency, Primark is also working to assist suppliers switching to renewable energy. Building on its collaboration with an energy consultant to develop a renewable energy roadmap to 2030, Primark has launched its first initiatives in India this year. The initial project involves factories located in Tamil Nadu collectively purchasing on-site solar panels, offering projected savings of approximately 25% per kWh compared to average grid tariffs. Primark is also exploring collective purchasing of offsite renewable electricity to enable factories to meet their additional energy demands.

Primark is also working on reducing its upstream transportation GHG emissions. While the business primarily transports its products by sea rather than air, upstream transportation still accounts for nearly 2% of its total GHG emissions. Since 2018, Primark has partnered with Maersk to ship its products from factories to depots. Maersk has introduced the ECO Delivery Ocean product, which uses fossil fuel alternatives such as biofuels, and Primark has recently begun to invest in these fuels through Maersk.

### Primark Transition Plan



*Solar panels on the roof of a Primark supplier factory, Bangladesh*

### Governance

A comprehensive governance system is established at Primark to oversee sustainability and ethics matters, including the delivery of the commitments related to its Primark Cares strategy, which coincides with Primark's transition plan in the medium term. There has been no change in this position from last year. The Primark Chief Executive and Executive Committee remain responsible and accountable for all decision-making and implementation, and ultimately approve the transition plan. Please refer to Primark's most recent reporting for a more detailed understanding of its sustainability and ethics governance structure.

### Risk management

In 2021/22 the ABF Group performed an initial assessment of the impact of climate-related risks and opportunities on Primark for which material risks and opportunities underwent scenario analysis. Any identified climate-related risks connected to the implementation of Primark's transition plan are managed through the governance structure described above. Primark recognises the need to evolve the initial scenario analysis by performing a deeper and more focused assessment of climate-related risks and opportunities across its value chain, ensuring that these get embedded into long-term transition, strategic and financial planning.

### Strategy, metrics and targets

In 2021, Primark launched its Primark Cares strategy building on the work of its Ethical Trade and Environmental Sustainability ('ETES') programme. Under Primark Cares, the business has set out a number of public commitments up to 2030 with a focus on three areas, Product, Planet and People, which are expected to accelerate its transition to a lower-carbon economy. As such, in the medium term the Primark Cares strategy coincides with Primark's transition plan.

The strategy includes an overarching objective to halve carbon emissions across Primark's value chain by 2030, from a base year of 2018/19, which is aligned with Primark's commitments under the UNFCCC Fashion Charter for Climate Action (FICCA) and, therefore, the 1.5°C Paris Agreement. Under the FICCA, Primark has also pledged to achieve net zero emissions no later than 2050. The organisation is working to define its plan

to reach this long-term goal, taking into consideration uncertainties beyond 2030 in technology development and innovation, as well as the political and regulatory global landscape.

At present, Primark has not included carbon offsets in its transition planning.

## Projects supporting carbon reduction to date

| <div> <div>Primark Cares Commitment</div> <div>Protecting Life on the Planet – Primark will halve carbon emissions across its value chain by 2030</div> </div> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Project                                                                                                                                                        | Energy efficiency and renewable energy procurement in the supply chain                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Timeline                                                                                                                                                       | 2018 – present                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Description                                                                                                                                                    | Primark has been working on a decarbonisation programme with key suppliers, which focuses on improving energy efficiency, reducing the energy intensity of manufacturing goods and moving away from a carbon-intensive fuel mix within manufacturing under tier 1, tier 2, and tier 3 of our supply chain. At the same time, Primark has been working to pool some of the factories in its value chain and assisting them in negotiating contracts so they can use their combined purchasing power to access renewable energy.                                                                                             |
| Target                                                                                                                                                         | Reduce absolute Scope 3 GHG emissions from ‘purchased goods and services category’ by 50% by 2030 from a 2018/19 base year.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Metric                                                                                                                                                         | Annual Scope 3 GHG emissions from purchased goods and services (tCO <sub>2</sub> e)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Methodology                                                                                                                                                    | Primark’s Scope 3 calculation methodology has been third-party reviewed by the Carbon Trust. It is not currently public.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Underlying uncertainties, challenges and assumptions                                                                                                           | <p>Challenge – maturity of renewable energy procurement in specific sourcing regions</p> <p>Challenge – supply chain monitoring and reporting for lower tiers</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Progress to date                                                                                                                                               | <p>Energy efficiency: Primark keeps scaling up its resource efficiency programme, having now engaged a cumulative total of 108 factories in all key sourcing regions (Bangladesh, India, China, Cambodia) since activities started. Renewable energy procurement: Primark kicked-off activities to support factories with collective renewable power procurement in India, according to the roadmap developed in 2022/23. In particular, a solar power profile was created for all first 39 contributing factories and a collective Request for Proposal (‘RFP’) will be released to local renewable power developers.</p> |

**Primark Cares  
Commitment**

**Protecting Life on the Planet – Primark will eliminate single use plastics and all non-clothing waste by 2027**

**Project** Eliminate non-clothing waste – Packaging Centre of Excellence

**Timeline** Early 2019 – present

**Description**

A dedicated team, within Primark's Packaging Centre of Excellence, manages the delivery of packaging transformation projects. An example of a project is Primark's durable new plastic clothes hanger design made from a minimum of 90% recycled polypropylene which has been designed for reuse/ to be retained. This design is being phased in for main apparel ranges, with completion due in 2027. Alongside reusing hangers retained in stores, Primark also collects unusable hangers to be recycled and made into new hangers. The move to recycled materials for all hangers is expected to achieve a reduction in Primark's carbon footprint attributable to hangers by 40%.

**Target** Eliminate single-use plastics by 2027

**Metric**

% reduction in tonnage of single-use plastic (SUP) packaging against 2022 baseline year  
% of SUP to overall packaging in tonnes

**Methodology**

The methodology is publicly available at the Basis of Reporting page of the [Primark website](#).

**Underlying  
uncertainties,  
challenges and  
assumptions**

Challenge and uncertainty - there are practical limitations, technical constraints and an absence of suitable alternatives that may impact Primark's goal of complete elimination of SUP by 2027

**Progress to date**

Performance against Primark's baseline will be reported from 2024/25 onwards Primark's SUP baseline of 21,797 tonnes represents 19.4% of our total packaging footprint for the baseline year

|                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Primark Cares Commitment                             | Giving Clothes a Longer Life – All Primark clothes will be made from recycled or more sustainably sourced materials by 2030                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Project                                              | Clothes made from recycled or more sustainably sourced materials.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Timeline                                             | Early 2021 – present                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Description                                          | Primark has committed to have all Primark clothes made from recycled or more sustainably sourced materials by 2030. The business works with certification bodies, to certify and validate claims it make on individual materials relevant to these standards. Primark also works hard to ensure that all Primark Cares products containing recycled fibres meet Primark’s quality testing requirements.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Target                                               | All Primark clothes will be made from recycled or more sustainably sourced materials by 2030                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Metric                                               | Percentage of Primark’s clothing units sold containing recycled or more sustainably sourced materials<br>Percentage of Primark’s clothing units sold containing cotton that is organic, recycled or sourced from the Primark Cotton Project                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Methodology                                          | The methodology is publicly available at the Basis of Reporting page of the <a href="#">Primark website</a> .                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Underlying uncertainties, challenges and assumptions | Challenge – restriction on the handling and trade of recycled materials due to regulatory changes<br>Challenge – some sourcing markets may not have access to all recycled or more sustainable material types<br>Challenge – for some less commonly used fabrics such as elastane, there are currently no sustainable alternatives available                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Progress to date                                     | 66% of Primark clothing units sold in 2023/24 contained recycled or more sustainably sourced materials, up from 55% the previous year and 25% in 2021. 57% of Primark cotton clothing units sold in 2023/ 24 contained organic cotton, recycled cotton, or cotton sourced from Primark Cotton Project, up from 46% last year. As our Primark Cares initiatives continue to grow in number, Primark is actively working on training and embedding processes to facilitate the conversion to recycled and more sustainably sourced materials. Building on last year’s training of 286 suppliers, Primark is continuing its efforts to further educate suppliers on the criteria required for products to meet its Cares standards. The business has already hosted six training sessions in February and March 2024, with plans for additional sessions in July 2024. The aim is to provide clarity to suppliers regarding Primark Cares requirements, including minimums, certification, and chain of custody. |

| Primark Cares Commitment Protecting Life on the Planet – Primark will halve carbon emissions across its value chain by 2030 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-----------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Project                                                                                                                     | Energy efficiency and renewable energy procurement in own operations                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Timeline                                                                                                                    | Early 2021 – present                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Description                                                                                                                 | <p>While significantly smaller than Scope 3, Scope 1 and 2 emissions are areas where the business has the most direct influence.</p> <p>Energy efficiency: Primark uses a system called the Energy Bureau, which allows the business to manage energy consumption remotely by monitoring and modifying environmental parameters, to maintain suitable store conditions in an energy-efficient manner. To further reduce energy consumption, Primark has also been switching to energy-efficient LED lightbulbs in stores globally.</p> <p>Renewable energy: Primark’s ambition is to switch all stores to renewable energy, as well as exploring ways to reduce emissions from on-site heating.</p> |
| Target                                                                                                                      | Reduce absolute Scope 1 and 2 GHG emissions by 50% by 2030 from a 2018/19 base year.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Metric                                                                                                                      | Annual Scope 1 and 2 (market-based) emissions (tCO <sub>2</sub> e)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Methodology                                                                                                                 | Annual Scope 1 and 2 emissions are calculated by ABF at Group level                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Underlying uncertainties, challenges and assumptions                                                                        | <p>Challenge – Misalignment between lease lifetime of some retail properties and payback period for installing new high-efficient equipment</p> <p>Challenge and uncertainty – Maturity of renewable energy procurement in specific markets</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Progress to date                                                                                                            | <p>By the end of 2023/24, renewable power contracts were in place in 8 countries, covering approximately 64% of Primark’s electricity demand</p> <p>The number of Primark stores fitted with energy-efficient LED lightbulbs significantly increased, from 141 in July 2023 to 274 in July 2024. At the end of 2023, the Energy Bureau covered more than 179 locations across the UK.</p>                                                                                                                                                                                                                                                                                                           |

|                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Primark Cares Commitments                            | Giving Clothes a Longer Life – Primark clothes will be recyclable by design by 2027. Primark will strengthen the durability of its clothes by 2025.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Project                                              | Giving Clothes a Longer Life                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Timeline                                             | Late 2021 – present                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Description                                          | <p>Circular design: Since the launch of Primark’s <u>Circular Product Standard ('CPS')</u> and its pilot clothing collection designed in line with CPS in April 2023, Primark has focused efforts on: continuing to expand and improve knowledge of circularity within the business via training; scaling up the use of circular design principles in key product categories; investing in additional expertise. The CPS is as an integral and foundational part of Primark’s overarching public ambition to become a more sustainable and more circular business.</p> <p>Durability: Durability to Primark means the amount of wear or use that a customer can get from an item of clothing over a period of time. Clothing is durable if it remains functional and wearable without requiring too much maintenance or repair, when faced with the challenges of normal wash and wear over its lifetime. As part of the Textiles 2030 initiative, Primark is taking part in an durability project led by WRAP.</p>                                                                                                                                                                                                                                                                                                               |
| Target                                               | <p>Primark clothes will be recyclable by design by 2027</p> <p>Primark will strengthen the durability of its clothes by 2025</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Metric                                               | <p>% of all clothing units sales that are circular by design</p> <p>% of clothing which passed the aspirational level of the durability framework</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Methodology                                          | <p>CPS developed in 2023 with support from third-party consultant</p> <p>Will be developed in the next financial year with support from third-party consultant</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Underlying uncertainties, challenges and assumptions | <p>Uncertainty – No industry-wide definition for ‘circularity’</p> <p>Uncertainty – No recognised standard for durability across the fashion industry</p> <p>Challenge – Today, many items of clothing are inherently hard or impossible to recycle based on their design, componentry, and fabric composition. For example – elastane is widely used within the fashion industry to ensure that a garment has adequate stretch to function and fit, but it is virtually impossible to recycle today. Primark’s approach to circular design is category specific, and will evolve as textile recycling innovation grows</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Progress to date                                     | <p>Circular design</p> <p>Training: Primark estimates that 80% of product colleagues have completed the foundation course of the Circular Design training by July 2024. This is an increase from 74% last year. Primark’s expert level training was trialled in October/ November 2023. This training will continue its roll-out.</p> <p>Product categories: following from the pilot collection in April, sales from circular clothing products have reached 3% of total clothing units sales (August 2023 – July 2024). For Spring / Summer 2024, Primark has seen major progress in menswear, kidswear and womenswear, with an increasing number of products meeting the CPS.</p> <p>Circularity team: The team has grown from one colleague to four in the past 12 months.</p> <p>Durability</p> <p>Primark has launched its Primark Durability Framework which is guided by the WRAP Clothing Longevity Protocol. Information on the framework is available <a href="#">here</a></p> <p>As of January 2024, extended wash testing has been implemented on all machine washable products across all product categories (excluding exempted categories of hand wash and dry clean only products)</p> <p>Primark’s extended wash testing methodology has been standardised and aligned across all machine washable products</p> |

## Emission reduction plan

Key priority areas for action were identified on the basis of the influence and materiality of emissions categories, assessed from the base year of 2018/19 (see the table below).

These are Primark's Scope 1 and 2 emissions, where the business has direct ownership, and the most significant Scope 3 categories in terms of absolute emissions (purchased goods and services; upstream transportation; use of sold products).

**Primark's baseline emissions (2018/19)**  
(% of total emissions across all scopes)

|                                        |       |
|----------------------------------------|-------|
| <b>Scope 1 and 2 (location-based)</b>  | 2.5%  |
| <b>Scope 3</b>                         | 97.5% |
| Of which:                              |       |
| Purchased goods and services           | 74.5% |
| Capital goods                          | 1.9%  |
| Fuel and energy-related activities     | 0.5%  |
| Upstream transportation                | 7.9%  |
| Waste generated in operations          | 0.1%  |
| Business travel                        | 0.2%  |
| Use of sold products                   | 11.8  |
| End-of-life treatment of sold products | 0.6%  |

## Scope 1 and 2 emissions

### Short term (present – 2025)

- Maintain ISO50001 certification for all stores, offices, and distribution centres.
- Develop appropriate regional pathways for heat decarbonisation in Primark properties.

### Medium term (2026 – 2030)

- Reduce absolute Scope 1 and 2 GHG emissions by 50% by 2030, from a 2018/19 baseline year.

### Scope 3 emissions

#### Short term (present – 2025)

- Launch an energy efficiency programme, engaging and supporting suppliers' manufacturing facilities on energy demand reduction.
- Launch a renewable energy programme, engaging and supporting suppliers' manufacturing facilities on sourcing low-carbon and renewable energy.

- Optimise inbound transport modes to balance emissions, cost and time.
- Strengthen the durability of Primark's clothes by 2025.

#### Medium term (2026 – 2030)

- Primark clothes to be recyclable by design by 2027.
- All Primark clothes will be made from recycled or more sustainably sourced materials by 2030.
- More regenerative agricultural practices will be used in the Primark Cotton Project.
- Eliminate single-use plastics and all non-clothing waste by 2027.

Primark acknowledges the uncertainties and challenges connected to the implementation of its medium-term plan, which include: supply chain monitoring and reporting for lower tiers; evolving climate policy in operating markets and sourcing regions; technology innovation and costs; consumer sentiment and behaviour. Primark is planning to address these through targeted long-term actions such as policy advocacy, data systems enhancement, supplier engagement and consumer education. Please refer to Primark's latest reporting for detailed information.

## Water - Retail



Water is a critical natural resource within the fashion industry, from the irrigation of cotton fields to the dyeing and finishing of fabrics and materials.



*A water efficiency project in Narayanganj, Bangladesh, supported by Primark*

Primark joined the [Alliance for Water Stewardship](#) (AWS) as a founding member in 2021, supporting its approach to improve the use of water resources and its commitment to adopt and promote a universal water stewardship framework, the AWS Standard. The AWS sets out five key outcomes associated with good water stewardship: sustainable water balance, good water quality status, healthy status of freshwater ecosystems, improved water governance, and Water Sanitation and Hygiene (WASH) for all.

To support these outcomes, Primark has developed a 2030 Water Impact and Stewardship Strategy. This strategy aims to enhance water management practices, reduce product water footprints, and mitigate adverse effects on hydrological systems, ecosystems and human health. The strategy includes mapping basin-level risks and evaluating operational water dependencies to identify suppliers and basins most vulnerable to water-related challenges. Primark recognises that climate change, increasing global demand for freshwater, and the rising levels of global pollution are putting additional pressure on already scarce water resources. Water quality and quantity risks are a key focus, and Primark aims to minimise these risks by prioritising basins with the greatest opportunities for impact.

The strategy includes three target areas for water management: product-based, site-based and catchment level.

For the product-based target area, which considers the entire value chain from cotton cultivation to consumer use, Primark aims to reduce the water footprint of products sold in the UK by 30% by 2030, in line with its commitment to WRAP's Textiles 2030 initiative.

For the site-based target area, in 2024, Primark conducted a comprehensive water footprint assessment of its value chain, which will be updated annually. The assessment identified wet processing factories and cotton cultivation stages as the most dependent on freshwater. The assessment also uncovered the water footprint of the different materials which makes up its products. With this information, Primark aims to develop internal measures to further drive the adoption of more sustainable materials.

Along with suppliers in stressed sourcing basins, Primark is collaborating with other water users, including brands and governing bodies, to address shared water challenges. Primark identifies stressed basins using tools such as [WWF's Water Risk Filter](#) and [WRI Aqueduct's screening tool](#), which aggregate water availability, quality and access risks.

Primark has expanded resource efficiency programmes across China, India and Bangladesh. In Bangladesh, 29 factories have identified more than 2 million m<sup>3</sup> of water per year of potential savings, resulting in an average 17% reduction in water use across those factories. The insights gained will guide a broader rollout.

Primark also launched a water recycling project this year through the Sustainable Manufacturing and Environmental Pollution (SMEP) programme in Bangladesh, which will introduce innovative technologies to reduce micropollutants and enable wastewater recycling. This project takes a holistic approach to the supply chain, examining how wastewater recycling can be integrated within a factory's broader resource management (energy, water and chemicals). Primark will work with local stakeholders in both the public and private sectors to share project outcomes and promote improvements in local water governance.

On the catchment level target area, Primark is committed to support catchment-scale projects in priority basins where water challenges pose the greatest risk to people and nature. Beyond reducing its own water footprint, Primark is involved in broader water stewardship initiatives to address shared challenges. The membership of AWS is a key part of this approach, incorporating community engagement, biodiversity and governance considerations, to address water challenges holistically.

To ensure the business is contributing towards basin level resilience, Primark has aligned its priority basins within its supply chains with those identified by the UN's Water Resilience Coalition (WRC), which has identified the world's 100 priority basins for collective action, enabling the business to collaborate and scale impact with other water dependent stakeholders.

## Case study - Primark

### Partnering with Oxford University to advance water quality monitoring



*OMB scientist testing wastewater samples, sent from Primark supply chain factories in Dhaka, to investigate linkages between water quality and ecotoxicity through OMB's unique biosensor technology*

Identifying the influence of various water users on water quality issues within the environment is complex. Interaction between industrial and domestic water users with the local hydrology, in addition to the existence of numerous water quality indicators, makes it difficult to link site level action with outcomes and impacts within a catchment.

To better understand this link, Primark supports a project with Oxford Molecular Biosensors (OMB) which is part of Oxford University. They have developed a biosensor to measure water quality using one aggregate indicator, ecotoxicity. Ecotoxicity is a measurement of the toxicity of aggregate constituents within water and their impact on freshwater species.

OMB is also the developer of a unique catchment water quality monitoring tool, Integrated Catchment model (INCA). This unique model allows for the quantification of the impact of various sources of pollution within the wider environment. The aim, through collaboration with Primark and eventually other stakeholders, is to combine the biosensor and INCA tools to begin to quantify the impact of site-level interventions on the wider environment, better linking water quality with outcomes to nature and to people.

## Case study - Primark

### Primark working with suppliers to tackle micropollutants



*Water filtration equipment ready to ship to Bangladesh for Primark's innovative wastewater recycling and micro pollution removal project*

In 2023/24, Primark supported a collaboration between The Microfibre Consortium and the Zero Discharge of Hazardous Chemicals (ZDHC) Foundation, as part of a wider task force to link suspended solids in wastewater with the concentration of microfibres. Importantly, this link enables Primark to better recommend effluent treatment plant processes to our suppliers to help with the removal of microfibres.

Primark is conducting research on how interventions and membrane technologies, such as those used in the Sustainable Manufacturing and Environmental Pollution project to recycle water, can contribute towards microfibre removal. It is working to understand the most appropriate pore size for membranes when considering the increased energy required as pore sizes decrease, and removal rates increase. Next year, it will incorporate these learnings as part of a broader water quality and wastewater recovery strategy.

## Waste and packaging - Retail



From the raw materials it sources to the waste in its stores, Primark is striving to responsibly manage the natural resources it relies on.

### Waste and circularity

Primark has made a commitment to give its clothes a longer life. Its ambition is to drive forward innovation and, through collaboration within the industry, to make its clothes last longer and reduce clothing waste.

Primark clothes will be recyclable by design by 2027. There is currently no single industry-recognised definition of the word 'recyclable' for textiles and clothing. Primark is focused on expanding the number of products that are circular by design in certain categories, creating specific product guidelines and engaging and training colleagues and suppliers on circular design principles. In other product categories, it is focused on testing, trialing and learning to overcome significant and inherent challenges. Some types of products and materials are much harder than others to move to a circular design.

Primark has worked with the [Ellen MacArthur Foundation](#) since 2018 as part of its 'Make Fashion Circular' initiative. In 2021, Primark became a Network Partner of the Foundation and joined its Advisory Board for Fashion. Primark has used the Foundation's design principles to create its [Circular Product Standard](#) (see more in circular product design). In 2024, Primark joined the Foundation's The Fashion ReModel to help the industry unlock the barriers to scaling circular business models.

In 2023, Primark launched its first circular collection and it continues to train teams to enable the business to expand circular design into key product categories such as denim and jersey, which are more simple to move into recyclable by design. Primark continues to translate these principles into tangible and practical guidelines for different clothing types and categories, such as knitwear. Approximately 3% of all Primark's clothing unit sales meet the criteria set out in its Circular Product Standard. Primark is now looking at circularity solutions for products made of blended fibres, recognised as one of the major inhibitors of textile-to-textile recycling.

## Circular product design

Primark's Circular Product Standard (CPS) is a framework for how it intends to design products now and in the future. The CPS was launched in 2023 after a two-year project with three partners; the non-governmental organisation WRAP, the circularity think tank Circle Economy and the non-profit sustainability educator Sustainable Fashion Academy. The framework is built on the vision of the Ellen MacArthur Foundation, for a circular economy for fashion.

The CPS sets out that a circular product has three fundamental criteria:

- designed with recycled or more sustainably sourced fibres;
- designed for physical durability; and
- designed to be technically recyclable at commercial scale.

A key focus in recyclable textiles and clothing is moving towards 'mono-materiality', which means using single fibre/fabric compositions instead of blends, and using the same composition where feasible for stitching threads, trims and pocketing. The other principle is based on eliminating or reducing 'disruptors', which are elements of an item of clothing that could 'disrupt' the recycling process, such as labels, hard trims and prints. There is no single industry level or legislative definition of 'recyclable' clothing.

Primark has a Circular Design training programme, co-developed by Circle Economy and the Sustainable Fashion Academy. Its foundation course is mandatory for all product teams. To date 529 colleagues (80% of eligible colleagues) have taken the foundation level of this training, which is designed to orient and familiarise colleagues with the basic concepts of a circular economy for fashion. In order to apply the learnings to different product categories, Primark has since partnered with the Circular Textiles Foundation (CTF) to evolve the programme to create expert-level training. These sessions involve smaller groups of colleagues and select suppliers. The goal of this programme is to co-create specific Circular Design Guidelines for each product category.

Primark works with key suppliers to support them in making the necessary changes to support its circularity aims. These include briefings, training sessions and webinars on specific product guidelines, technical and design standards, and the data they need to provide for its validation processes. Primark also uses some of these sessions to discuss design techniques and strategies that support its ambitions for more recyclable and durable clothing.

As part of its desire to raise the bar for circular design where practical and feasible, Primark intends to periodically refresh and update the CPS based on new and emerging recycling capabilities, and its reflections from scaling circular design to date. Future legislation is expected to challenge existing assumptions and parameters of circular design and guide the evolution of the CPS.

## Durability

Primark is dedicated to strengthening the durability of its clothes by 2025. Primark published its Durability Framework in July 2024. The framework is a set of guidelines for durability testing that can be embedded into business and contributes to the development of best practices as no industry standard currently exists. Primark consulted with WRAP and its Textiles 2030 initiative to establish this framework. Within it sits two pillars of testing, 'extended washing' and 'physical quality'.

Beneath each pillar and building on the minimum compliance levels that already existed, Primark has added three additional tiered levels: foundational, progressive and aspirational. Underpinning this framework is a

set of continuous improvement principles that support the integration of durability at every step of product production from design through to manufacturing. Since January 2024, eligible clothing has been tested to the aspirational level of 45 washes. There are some exemptions, for example anything that needs hand washing or dry cleaning is not currently part of the extended wash framework.

Primark has been working in conjunction with third party testing labs to implement extended wash testing. This will help establish standardised data across all partners, allowing the business to set a clear baseline. Primark has now collected a full year's durability data for denim, socks and jersey. This will enable it to build a full product performance baseline and truly understand how each product category is performing on durability. Since January 2024, 66% of clothing that was tested passed the aspirational level.

As part of its durability commitment, Primark has continued to roll out its repair workshops, supporting customers and colleagues to love and wear their clothes for longer. The free repair workshops are accessible and inclusive for all, and focused on quick, easy and practical skills that empower participants to complete their own repairs. Over the last year, these have been scaled further in the UK and ROI, and introduced in the Netherlands, France and Italy. Since 2021, Primark has run 393 workshops in total across the regions, with 7,157 free places to customers and colleagues<sup>1</sup>. To maximise the reach of the repair workshops, Primark has created an online customer hub with repair tutorials.

## Chemicals

Chemistry enables the creation of a wide array of materials and colours used in Primark's clothes. Chemistry can also improve the performance, safety and environmental impact of products, and plays a key part in raw material production. Most of the chemicals used are applied during the 'wet processing' phase, which includes dyeing, printing, bleaching, tanning or washing of materials.

Effective chemical management protects both consumers and workers in Primark's supply chains. It increases resource efficiency, contributes to cleaner air and water and can reduce impacts on biodiversity.

Primark has developed a 2030 Chemistry Strategy with continued focus on compliance and developing more sustainable chemistry. Capacity building and innovation are key priorities to equip the business and suppliers with the skills necessary and focus on meeting upcoming challenges.

Primark rolled out CleanChain's Compass Dashboard this year to improve data analytics of supply chain chemical information, such as chemical inventories and wastewater testing results, to improve monitoring, data-driven management and decision-making.

Primark has a Restricted Substance List (RSL) which is aligned with the [Apparel and Footwear International RSL Management \(AFIRM\) Group](#). It is also a board member of the [Zero Discharge of Hazardous Chemicals \(ZDHC\) Foundation](#). Primark's Chemical Management Guidance assists wet processors in complying with ZDHC guidelines. Primark is dedicated to supporting its suppliers with the tools and guidance needed to use chemicals safely. It has regional environmental teams across strategic sourcing countries, which engage directly with suppliers' factories to provide awareness and training in relation to chemical management. This includes requirements for factories to compile and submit chemical inventories so that Primark can evaluate its usage of chemicals in reference to the [ZDHC Manufacturing Restricted Substances List \(MRSL\)](#). In 2023, 251 key wet processors submitted their chemical inventories through ZDHC InCheck reports.

Primark delivers regular training on its chemical management requirements to suppliers and wet processors in the supply chain. With Primark's support, 198 factories in the supply chain completed ZDHC's [Supplier to Zero programme](#), focused on improving chemical management systems. ZDHC Chemical Management

System Technical Industry Guide training was delivered to 59 factories, working with a third party to implement improvement actions on the ground.

Primark launched a wastewater testing due diligence programme in 2023/24 targeted at 20 factories that had not recently tested to the ZDHC guidelines. Alongside working with the factories to improve the quality of their waste water and chemical management, the results have helped to refine its testing approach and analysis. In 2023, 241 key wet processors tested their wastewater to the ZDHC guidelines. Through the Brands Hardlines Collaboration, Primark has contributed to the foundation's work for the recently announced expansion of the ZDHC MRSL to broaden the approach to supply chain chemical management to further product categories. As part of this commitment, Primark completes an annual assessment of its chemical management programme. In 2023/24, its performance was rated in the second highest category 'Accelerator' by the ZDHC Foundation, which refers to organisations with the influence to increase the use of ZDHC tools in the industry<sup>2</sup>.

Driving the use of more sustainable chemistry is essential to the Primark Cares strategy. Three wet processors are continuing to pilot [Aii's](#) Clean by Design Chemistry and Wastewater programme, with some promising improvements indicated through the mid-term reports. The final outcomes will help to guide future decisions on site-based efficiency improvements linked to Primark's broader Resource Efficiency Programme.

## Plastic and packaging

As one of its main sources of non-clothing waste, product packaging is a priority focus area for Primark. The business has committed to removing all single-use plastic by 2027, and has developed short, medium and long-term packaging roadmaps to achieve this objective.

Primark has an in-house team of packaging technologists, who provide expertise on omnichannel packaging design, material selection and commercial considerations.

Primark has established a baseline of all of its packaging to enable it to accurately measure its footprint and future reductions. To create this baseline, it collected packaging data from 470 global suppliers between January 2022 and January 2023. Compliance with this data collection is a part of the supplier scorecard requirements from August 2024.

Plastic represents 19% of its total packaging tonnage. Any future packaging improvements will be tracked against this baseline and reported on, in line with the Primark Cares objective. Clothes hangers are estimated to account for around two thirds of total single-use plastic volumes used within Primark. The business is aiming to move to recycled materials for all hangers over time.

In 2023/24, hangers made from a minimum of 90% Certified Recycled Polypropylene were introduced for tops, bottoms, jackets and footwear. These are being rolled out on a phased basis, with completion expected in 2027. Lingerie and swim items are being converted to cardboard hangers by the end of 2025.

While Primark has always reused hangers in its stores wherever possible, it is now starting to collect un-reusable hangers to be recycled and made into new hangers in partnership with its recycling partner Mainetti. In July 2024, a pilot began in three UK stores to collect un-reusable plastic garment hangers, size markers and hanging accessories to be sent to a processing facility.

1. These include sessions held with the Fashion School.

2. ZDHC Knowledge Base: 'Accelerator' Definition. <https://knowledge-base.roadmaptozero.com/hc/en-gb/sections/360002796277-Glossary#15337053980701>

3. Only machine washable clothing is included. There are some products that are exempt such as underwear which should be handwashed.

## Case study - Primark

### Pioneering circular leisurewear



*A T-shirt from the Primark Cares Collection made with cotton from the Primark Cotton Project*

Beyond scaling circular design via t-shirts and denim, Primark has been using key collections to test and trial new approaches.

Previously, almost all of the leisure products produced by Primark, such as hoodies and joggers, were made from a polyester/cotton blend. This is currently a blend that is hard to recycle except under certain conditions that are not industrially scaled.

Through its Rita Ora collection, Primark is testing and trialling a small collection of leisure products made from 100% cotton, which is much easier to recycle. This includes its Rita stretch vest. Typically, stretch qualities in fabrics and products are achieved via the use of a percentage of elastane. However, elastane is widely regarded by most commercial recyclers as one of the most challenging disruptors to the recycling process.

A rib vest and tee collection was developed that uses no elastane, using a specific 'rib' construction to achieve a level of stretch. Through this pilot, Primark is now working to scale up similar fabrications, using cotton instead of cotton/elastane where feasible to achieve stretch. It is using this pilot to build more robust and concrete circular design guidelines and principles for leisure products, and will be working with its product teams to further test, trial, scale and embed these principles over the coming years.

## Agriculture and farming practices - Retail



Primark depends on effective agricultural practices and natural commodities to make its products.



*A cotton farmer in the Primark Cotton Project in India*

### Responsible agriculture, biodiversity and land use

Primark depends on the agricultural sector for its raw materials, such as cotton, which is the main fibre used in Primark's products. Globally, cotton is the most widely grown non-food crop, providing income for more than 250 million people<sup>1</sup>. Climate change and extreme weather events pose significant risks to this sector, threatening both the supply chain and the livelihoods of farmers.

Primark set up the Primark Cotton Project (formerly the Primark Sustainable Cotton Programme<sup>2</sup>) in India in 2013. The Primark Cotton Project trains farmers, predominantly smallholder farmers, to reduce water use and dependence on chemical fertilisers and pesticides. It also teaches skills such as seed selection, land preparation, sowing and harvesting.

Beyond training, the Primark Cotton Project is providing additional support to help farmers manage the consequences of climate change. Primark has supported farmers recovering from climate-related disasters, including assisting over 100 farmers in Gujarat affected by cyclone damage. This has included funding for construction of rainwater harvesting structures to provide access to fresh drinking water.

To explore ways to help build cotton farmers' resilience, Primark commissioned the International Institute for Environment and Development to assess the availability and uptake of insurance products for farmers that guard against risks such as the effects of extreme heat on production. The findings from this will be used to understand how Primark can better support potential new solutions to facilitate farmers' access to suitable insurance.

Soil health and biodiversity loss pose potentially significant challenges to the global food system. Conventional farming methods, which can depend on chemical inputs, may contribute to soil degradation, reduced agricultural productivity and a decline in biodiversity.

Primark has partnered with Biodiversify since 2021 to develop a robust Biodiversity Monitoring framework for the Primark Cotton Project. This is aligned with leading standards and guidelines, including the Science Based Targets for Nature (SBTN), the Task Force on Nature-related Financial Disclosures (TNFD) and the International Union for Conservation of Nature (IUCN). This framework will enable the business to identify and mitigate biodiversity-related risks within the supply chain.

## Deforestation

Primark uses man-made cellulosic fibres derived from wood-pulp, such as viscose, to make its products. It also uses paper in its packaging and wood in some of its products. Primark has its own Wood and Wood-Derived Fibre Policy, which sets out its approach to sourcing these materials responsibly.

Primark will be impacted by the upcoming EU Deforestation Regulation (EUDR). Primark is working with external bodies and suppliers to address the new requirements.

In addition to this ongoing work, Primark has also been a partner of the not-for-profit environmental organisation, Canopy, since 2022. Primark continues to work alongside other fashion brands through the CanopyStyle initiative, which aims to transition fashion supply chains away from using ancient and endangered forest material and bring lower-impact fabric alternatives to customers. Primark is part of Canopy's Pack4Good initiative, which is working to ensure companies move away from forests to use low-impact paper packaging options and reduce dependency on virgin wood-derived packaging. All Primark suppliers are required to source only from man-made cellulosic fibre producers that are green rated by Canopy's Hot Button ranking.

## Animal health and welfare

As Primark increases the use of more sustainably sourced materials across its product range, it continues to ensure that animal welfare is an integral part of its selection criteria.

Animal-derived materials such as leather, wool, cashmere, mohair and alpaca make up around 1% of the materials used in Primark products. The business is committed to responsibly sourcing any materials, even if used in small quantities. Primark supports the development of animal welfare standards and certifications, having an Animal-Derived Material Policy that requires suppliers to comply with industry standards.

Primark does not support the use of animal testing that is not required by law. Its own-brand cosmetics have been approved by the Leaping Bunny Program, an internationally recognised gold standard for cruelty-free products, since 2021.

<sup>1</sup> <https://www.worldwildlife.org/industries/cotton#:~:text=Donate-,Overview,in%20a%20variety%20of%20ways>.

<sup>2</sup> The Primark Sustainable Cotton Programme was renamed to the Primark Cotton Project in 2024. All other aspects of the programme remain the same, and we will continue to train cotton farmers in methods to reduce the environmental impact of the cotton they grow in the regions where the Primark Cotton Project operates.

### The Primark Cotton Project



*A cotton farmer in the Primark Cotton Project, India*

Primark has committed that 100% of the cotton in its clothing will be either organic, recycled or from the Primark Cotton Project by 2027. In 2023/24, 57% of its cotton clothing units sold contained cotton that was organic, recycled or from the Primark Cotton Project.

The Primark Cotton Project equips smallholder farmers with essential knowledge and skills to drive the adoption of more sustainable agriculture practices. These include techniques to improve yields, reduce chemical inputs such as pesticides and fertilisers, and improve farmer incomes.

Primark started the Primark Cotton Project in India in collaboration with agronomic experts [CottonConnect](#) and the [Self-Employed Women's Association](#) (SEWA). The project subsequently expanded to Pakistan and Bangladesh where it also works with local partners, Rural Education and Economic Development Society (Reeds) in Pakistan and Thengamara Mohila Sabuj Sangha (TMSS) in Bangladesh. As at the end of July 2024, 309,394 farmers have received training through the Primark Cotton Project.

Traceability is a fundamental element of the Primark Cotton Project. Primark uses CottonConnect's system, TraceBale, to track and help segregate the cotton produced by farmers in the project as it flows through the supply chain, from farmers through to ginneries and spinners. Primark was also one of the first high street fashion retailers to partner with [Oritain](#), a specialist scientific verification firm which uses forensic science techniques to verify the origin of cotton samples.

### Shifting to regenerative agriculture

Over recent years, Primark has been exploring how to evolve the Primark Cotton Project to include specific training for smallholder cotton farmers on more regenerative farming practices.

In 2024, around 3,000 farmers in India, Bangladesh and Pakistan completed their third and final year of a pilot initiative aligned to CottonConnect's [REEL Regenerative Code](#). The farmers are now trained in practices such as reducing soil tillage and promoting agroforestry.

If effectively implemented, such practices can be beneficial to both the environment and farmers. For example, reduced tillage helps to preserve the soil structure and therefore better supports plant growth. It may also help the soil to retain carbon, therefore potentially reducing emissions released into the atmosphere.

By the second year of the pilot, Primark found that 80% of farmers had implemented at least two soil health practices (such as crop rotation or intercropping), 55% at least two pest management practices (such as homemade bio-pesticides and use of traps) and 26% one water management practice (like furrow or micro irrigation). Many farmers also chose to plant trees around the cotton farms with the aim to improve biodiversity.

The data from year three is still being collected but Primark expects to see an increase in the uptake of regenerative practices across all areas among the farmers.

In 2023/24, Primark also:

- developed a roadmap to use more regenerative practices within its programme by 2030;
- began embedding the [REEL Regenerative Code](#) into its core training so that all new farmers in the cotton supply chain will now complete it as standard;
- engaged agronomic experts at [Harper Adams University](#) to conduct a review of its approach to make sure it draws on international best practice; and
- continued development of its Biodiversity Monitoring Framework so it can measure the impact of its training over time on biodiversity.

## Strengthening resilience

The Primark Cotton Project promotes initiatives among farmers intended to help mitigate the effects of climate change on their crops while aiming to increase their income. For example, farmers have been supported to establish 'input centres'. These centres produce bio-based pesticides which enable a reduction in the use of chemical pesticides. Additionally, these centres provide an additional source of income to the farmers operating them.

## Monitoring biodiversity in India



*Monitoring for biodiversity on a Primark Cotton Project farm in India*

In March 2024, Primark began a long-term biodiversity monitoring programme with its partners in Gujarat, India. The programme is focused on delivering a better understanding of how the biodiversity in Primark's cotton supply chain changes over time.

The programme was developed from learnings derived from a pilot biodiversity field survey carried out in partnership with Biodiversify and the Srushti Conservation Foundation on Primark Cotton Project farms in Gujarat. Primark's partners CottonConnect and SEWA were also involved in facilitating the surveys as well as providing more in-depth local context.

14 farms across five villages were selected for the programme based on their natural habitat profile and logistical considerations. Species monitored have included plants, invertebrates, reptiles, amphibians, birds and mammals, alongside soil sampling. A questionnaire with local farmers assessed the level of understanding and awareness of biodiversity among the farmers to add further context.

This pilot has enabled Primark to define a biodiversity monitoring methodology that can be applied over time and elsewhere.