

Primark Stores Ltd response to BHRRC Myanmar Foreign Investment Tracking Project

1. Does your company have investments or operations in Myanmar or is it seriously considering investing or operating there? If so, please provide information on the nature of these investments, and which geographic areas and communities they will affect.

Primark has no direct investments in Myanmar.

Primark is producing small orders from Myanmar (Yangon and Bago) in a select group of factories that meet, and are monitored against, our Supplier Code of Conduct on ethical standards.

2. Do you have policies and procedures in place to prevent your business activities or investment from contributing to human rights abuse and social conflict in Myanmar (including, for example, human rights due diligence measures)? Please specify whether these policies and procedures apply to your company in general, or specifically to your Myanmar investment. If you have human rights policies and procedures regarding investing or operating in Myanmar, are you willing to share them for posting on our website? If so, please send them as a Word or PDF file, or, if available, as a hyperlink.

Primark undertook a due diligence process prior to entering the Myanmar market to assess potential and actual risk within the proposed supply chain. We continue to monitor the situation in Myanmar, and are proactively engaged with a broad range of stakeholders, including the ILO, trade unions, and labour rights groups, on the challenges of sourcing from Myanmar.

Primark's programme with suppliers is underpinned by the ILO Declaration on Fundamental Principles and Rights at Work, as contained within its Supplier Code of Conduct. Compliance with the Code forms part of the Terms and Conditions of Trade, and all manufacturing sites are audited against the Code prior to approval for production, and then are monitored against the Code on a regular basis. The Code can be found on our website in both English and Burmese <http://www.primark.com/en/our-ethics/workplace-rights/code-of-conduct>

3. Who in your leadership is responsible for ensuring compliance with the policies and procedures in no. 2?

Primark's Ethical Trade Director, Katharine Stewart, has overall responsibility for the Ethical Trade & Sustainability programme. Primark is owned by Associated British Foods Plc (ABF) and Katharine Stewart reports to Paul Lister, Director of Legal Services and Company Secretary, ABF.

4. If you do not yet have human rights policies and procedures in place, do you have plans to develop them? If so, what efforts are you currently engaged in or plan to engage in on this regard?

See response to Q2

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5. Has your company held any consultation with workers and unions at factories in Myanmar prior to the start of the suppliers' operations or any other time after the start of the operations? If so, what was the outcome of the consultations?

Worker consultation is mandated within our supplier audit and monitoring programme. All manufacturing sites are audited against our Supplier Code of Conduct prior to approval for production, and then are monitored against the Code on a regular basis. Information attained through worker consultation is treated in confidence, and forms a critical part of the audit findings.

As part of our wider due diligence process, we have engaged with key stakeholders including with labour rights groups and trade unions, either directly and / or through the Business for Social Responsibility (BSR) Myanmar Responsible Sourcing working group. The group was established to create a best practice implementation framework for factories.

6. How does your company try to prevent or mitigate conflicts that affect its operations or the surrounding communities (including armed conflict, inter-communal conflict and violence, etc.)? Could you please list your policies, procedures or concrete activities in this regard, including community engagement and dialogue measures and revenue sharing agreements?

See response to Q2

7. Who should communities or civil society groups contact if they have questions or concerns about your investment or operations in Myanmar? Please provide their contact information.

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9. We further invite you to respond to questions specific to your industry. Does your company have policies and procedures in place to address each of the following areas? If so, please provide details:

- Freedom of Association and collective bargaining
- Living Wages
- Workplace health and safety
- Child Labour
- Forced Labour
- Anti-discrimination (whether based on race, gender, religion, nationality, etc)

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Primark's programme with suppliers is underpinned by the ILO Declaration on Fundamental Principles and Rights at Work, as contained within its Supplier Code of Conduct. The Code covers all the sections above, in addition to Regular Employment, Harsh or Inhumane Treatment, and Anti-Bribery and Corruption.

Compliance with the Code forms part of the Terms and Conditions of Trade, and all manufacturing sites are audited against the Code prior to approval for production, and then are monitored against the Code on a continual basis. The Code can be found on our website in both English and Burmese <http://www.primark.com/en/our-ethics/workplace-rights/code-of-conduct>