

# Primark Stores Ltd response to BHRRC Question for garment brands re Syrian refugees in Turkey

## Policy:

- 1. Does your company have a policy specifically prohibiting discrimination & exploitative practices against Syrian refugees? (If so please provide a link to this policy or provide it as an attachment). How is this policy communicated to suppliers in Turkey?**

We have been a member of the ETI working group on Turkey since January 2015 and the group has collaborated with the Fair Labour Association and the Fair Wear Foundation to ensure garment brands sourcing from Turkey use their combined leverage to have an effective, cohesive response to this issue.

Primark's programme with suppliers is based on the ILO Declaration on Fundamental Principles and Rights at Work, as contained within its Supplier Code of Conduct, which addresses labour standards and working conditions. This forbids any discriminatory or exploitative practices. Compliance with the Code forms part of the Terms and Conditions of Trade, and all manufacturing sites, including those in Turkey, 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 English, Turkish and Arabic. <http://www.primark.com/en/our-ethics/workplace-rights/code-of-conduct>

Our team on the ground in Turkey communicates to our suppliers continuously as well as through our auditing and monitoring programme. For example, a letter was sent to all our Turkish suppliers in February 2015 reminding them of the requirement for all workers to have the necessary right to work documentation.

## Audits/risk assessment:

- 2. How many first tier Turkish suppliers does your company have?**

We do not currently disclose the number of suppliers that we work with; however, Turkey is a relatively small sourcing country for Primark, representing approximately five per cent of our total volume. Regardless of this, we have a robust auditing and monitoring programme in place, supported by a local team on the ground, and a programme of engagement with relevant stakeholders and international agencies to ensure we are aware of, and are addressing any risk within the supply chain.

- 3. How many have been audited since 1 Jan 2015? What percentage of audits have been unannounced?**

100% of our suppliers' sites have been audited during 2015 and we have doubled the frequency of our audits in Turkey. Approximately ten per cent of the audits conducted during 2015 were unannounced; and 56% were semi-announced, where the supplier is not told the exact date of the audit, only that it will happen within a 14 day window.

- 4. Does your company carry out audits beyond the first tier? If so what percentage of second & third tier Turkish suppliers have been audited since 1 Jan 2015 and what percentage of these audits have been unannounced?**

We are currently extending audits to include tier two sites.

- 5. Do the audit & monitoring teams have Arabic-speakers who have received special training tailored to the situation of Syrian refugees, and do they speak with the workers confidentially?**

We are in discussions with local providers and plan to have this type of specialist support in place over the next few weeks.

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Worker consultation is mandated within our supplier audit and monitoring programme and we do this regularly with all supplier factories in Turkey. Information attained through worker consultation is treated in confidence, and forms a critical part of the audit findings.

## **6. How does your company address the possibility of undeclared subcontracting in its supply chain?**

Our Terms and Conditions of Trade require all suppliers to declare all sites manufacturing our products. Subcontracting to unapproved sites would be a breach of these conditions and could lead to Primark discontinuing its trading relationship with the supplier. It should be noted that any such action would be carried out in line with the guidance set out by the ETI for its members on responsible exit.

## **7. Has your company identified supplier factories employing Syrian refugees in 2015? If the answer is yes please state how many factories, if possible**

During 2015, our audits identified undocumented Syrian workers in a small number of factories.

## **8. Has your company identified supplier factories employing Syrian child refugees in 2015? If the answer is yes please state how many factories, if possible**

We have not identified any factories employing Syrian child refugees although we remain aware of the risk.

### **Remediation:**

## **9. When Syrian refugees are identified at a supply factory, what process does your company expect the supplier to follow? In particular please state whether they remain in employment.**

We follow the approach agreed at the ETI and Fair Labour Association joint roundtable in March 2015. We require suppliers to demonstrate that their workforce has the correct documentation. If this is lacking, suppliers are responsible for assisting and supporting workers in their application for the correct documentation. Workers would remain in employment while the proper documentation is obtained. However, we would keep a close eye on this as we would expect this to be done within an appropriate timeframe.

## **10. Does your company have a remediation plan that addresses instances of discrimination/abuse against Syrian refugees in its supply chain? If yes please provide details of the plan, how it is communicated to refugees, and examples of outcomes if available.**

We take our responsibility for workers in our supply chain extremely seriously and any issues of discrimination and abuse of ANY workers would be dealt with swiftly, and where necessary with support from external partners including trade unions, NGOs and worker rights organisations.

In our view, the first line of protection for Syrian refugees working in garment factories is having the correct 'right to work' documentation. We are currently in discussion with a local Turkish NGO who will be able to support individuals, on issues such as obtaining this 'right to work' documentation.

## **11. Does your company work with any local NGOs or trade unions to provide remediation services to refugees?**

*See response to Q10*

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**12. As Syrian refugees cannot receive social security benefits at this time, is your company taking steps to ameliorate the impact of this?**

Yes, our focus is on ensuring correct wages are paid.

## Capacity building

**13. Has your company undertaken any specific training with its first tier suppliers on this issue?**

*See response to Q1*

**14. What steps has your company taken to ensure that your policies/approach are being implemented by suppliers beyond the first tier?**

*See response to Q4*

## Stakeholder engagement

**15. Does your company engage with local civil society groups and trade unions on this issue, for instance, in negotiating a policy position & carrying out risk mapping?**

We have identified relevant stakeholders including local NGOs and trade unions, as part of our wider stakeholder mapping and due diligence process. We continue to engage with the relevant parties to ensure we remain aware of the risks, and have an effective programme for addressing these risks.

**16. Does your company work with trade unions on identifying health & safety risks for Syrian refugees (where communication may be difficult)?**

*See response to Q10*

**17. Does your company work with trade unions or other partners to offer training and education programmes for refugees?**

*See response to Q10*

**18. Has your company engaged the Turkish Government regarding the legal framework for Syrian refugees?**

We are a member of the ETI working group on Turkey, and the group has collaborated with the Fair Labour Association and the Fair Wear Foundation to ensure garment brands sourcing from Turkey use their combined leverage to have an effective, cohesive response to this issue.

There has been regular engagement with the Turkish government through the collective leverage of these groups, and most recently in January 2016, where brands, including Primark, met with the Chief Advisor to the PM to discuss the recent decision to issue work permits to Syrian refugees. Publication of the regulation on work permits was published in the following days after the meeting and we are continuing to monitor the implementation of this.