

Company name: Associated British Foods (Primark)

Total weighted score: 36.1* out of 100

Weighted score by measurement area

Weighted Score	Out of	Measurement area
9.0	20.0	Governance and strategy
7.1	17.5	Representation
4.0	17.5	Compensation and benefits
4.4	17.5	Health and well-being
6.6	17.5	Violence and harassment
0.0	5.0	Marketplace
5.0	5.0	Community

(*) The scores in this detailed assessment are unweighted (out of 2) and, therefore, change when weights are applied per the [Gender Benchmark Methodology 2020](#). Differences between the total weighted score and the sum of the weighted scores across measurement areas may occur due to rounding, but this has not had any overall effect on the ranking.

Governance and strategy (20% of total score)

CORPORATE

Indicator	Score (out of 2)	Assessment
1. Strategic action	0	NOT MET: Whilst the company is working on advancing gender equality in the supply chain, there is no evidence that a public commitment to advance gender equality in the full value chain, at the CEO level, has been made
		NOT MET: Whilst the company has recently established a Diversity and Inclusion Steering Committee to further develop a strategy, at present there is no evidence of a clear strategy on advancing gender equality and women's empowerment across the full value chain.
		NOT MET: There is no evidence that the company has undertaken a self- assessment or third-party assessment or certification for gender equality
		NOT MET: There is no evidence the company has at least two public targets, covering two different issues (e.g. representation and pay) or in two different areas of the value chain (e.g. workplace and supply chain).
2. Senior leadership accountability	0.5	PARTIALLY MET: The Diversity and Inclusion Steering Committee, which comprises of senior leaders across its business, is responsible for gender equality within the company, whilst the Ethical Trade & Environmental Sustainability Director is responsible for gender equality and women's empowerment within the supply chain. However, the company does not have one individual who is responsible for gender.
		NOT MET: There is no evidence that the company has targets on advancing gender equality and women's empowerment in the full value chain or, therefore, annual oversight of progress against its targets.

3. Gender-responsive human rights due diligence process	2	MET: The company discloses that it undertakes human rights due diligence and assesses risk through various channels, including by analysing its audit data. The company's audits include gender-based discrimination and sexual harassment, which means these issues are being screened during the risk assessment process.
		MET: The company has identified 2 human rights risks where they have assessed that women are at an increased risk as a result of their gender (modern slavery and poor recruitment, hiring and working practices in mills in India)
		MET: The company engages potentially affected women in the supply chain through its "Drawing the Line" tool and in 2019 partnered with the UK FCDO (formerly DFID) on its Work and Opportunities for Women (WOW) programme to have help analysing gender-related audit data.

WORKPLACE

Indicator	Score (out of 2)	Draft assessment
4. Sex-disaggregated data	0.5	NOT MET: Whilst the company does collect grievance data, there is no evidence that the company collects, analyses and monitors sex-disaggregated grievance data (e.g. number of grievances reported, number of grievances remediated), at least annually.
		MET: The company collects, analyses and monitors sex-disaggregated data on the gender balance of its workforce across various levels of leadership at least annually.
		MET: The company collects, analyses and monitors sex-disaggregated data on the percentage of employees participating in 'Women in ABF' at least annually.
		NOT MET: There is no evidence that the company collects, analyses and monitors sex-disaggregated data on turnover and absenteeism, at least annually.
		NOT MET: There is no evidence that the company collects analyses and monitors sex-disaggregated data on its global gender pay gap, at least annually.
		NOT MET: There is no evidence that the company collects, analyses and monitors sex-disaggregated data on the remediation of violence and harassment grievances at least annually.
		NOT MET: There is no evidence that the company collects, analyses and monitors sex-disaggregated data on the total procurement spend that is directed to women-owned businesses.
		NOT MET: There is no evidence that the company collects, analyses and monitors sex-disaggregated data on injuries, fatalities and absenteeism of workers in the supply chain.
5. Grievance mechanism	2	<p>MET: The company's grievance mechanism includes at least 6 gender-responsive elements:</p> <ul style="list-style-type: none"> - Confidential - Anonymous - Alternate access to a party concerning the grievance, if the perpetrator is the direct supervisor of the aggrieved party - Allows verbal submission of grievances via a telephone line - Ensures protection of the aggrieved party (non-retaliation) - Is available in multiple language or has interpreters available
6. Employee engagement	0	NOT MET: There is no evidence available to suggest that the company has employee surveys or other engagement mechanisms that specifically address gender equality and women's empowerment issues.
		NOT MET: There is no evidence to suggest that the company has incorporated feedback related to gender issues into its policies and/or practices.

7. External stakeholder engagement	1	MET: The company provides a detailed list of the partnerships and stakeholders that it engages with to help it address gender issues and support women's rights and women's empowerment. It also provides details on its involvement with Business Fights Poverty to prevent and address gender-based violence and the UK FCDO on its Work and Opportunities for Women (WOW) programme.
		NOT MET: Whilst the company engages with external stakeholders on gender issues and it is currently considering feedback from UK FCDO on how it might strengthen its collection and analysis of gender-related data, this is still under consideration and no evidence could be found to confirm that any previous, similar feedback has already resulted in a change to its policies and/or practices. It is also not clear if it will be implementing the toolkit developed by Business Fights Poverty to identify, prevent and address gender-based violence in the garment sector.

SUPPLY CHAIN

Indicator	Score (out of 2)	Assessment
8. Commitment in the supply chain	0	NOT MET: No evidence was found to suggest that the company requires its suppliers to undertake a gender needs assessment and the company confirmed in its survey response that it does not require this.
		NOT MET: The company does not have any publicly disclosed targets on gender equality
		NOT MET: The company does not have any publicly disclosed targets on gender equality .
9. Grievance mechanism in the supply chain	1.5	PARTIALLY MET: The company's grievance mechanism is available to its suppliers, supply chain workers and other external individuals and communities. The company also shares information with workers in the supply chain on how they can raise complaints directly during audits, however there is no evidence that the company collects, analyses and monitors sex-disaggregated data in its supply chain (e.g. number of grievances reported, number of grievances remediated).
		PARTIALLY MET: The company requires suppliers to have a procedure that allows workers to raise workplace grievances (without fear of reprisal) and this must be clearly communicated to and accessible by workers, however there is no requirement for suppliers to collect and analyse sex-disaggregated grievance data or for the mechanism to be available to external parties and communities.
10. Corrective action process in the supply chain	1.5	PARTIALLY MET: The company screens for some gender-related issues among its suppliers, such as: - Discrimination based on gender - Discrimination based on marital status - Sexual harassment - Informal workers
		However, the company does not screen for other gender-related issues like intimidation, harassment, retaliation or violence against trade union members/representatives.
		MET: The company provides all factories with a corrective action plan (CAP) detailing all non-compliances with the Code of Conduct, which includes gender-related issues, and a timeline is given to remediate these issues.
		NOT MET: Whilst the company confirmed that in the most extreme cases it will stop working with a supplier altogether if it feels a supplier is unwilling to improve, there are no details on the type of issues that it are considered most extreme and if this includes any gender related issues.

Representation (17.5% of total score)

WORKPLACE

Indicator	Score (out of 2)	Assessment
11. Gender equality in leadership	0.5	NOT MET: Less than 40% of the members of the board are women (25%)
		NOT MET: Less than 40% of the senior executives are women (23%)
		MET: Between 40-60% of senior management are women (54%)
		NOT MET: There is no evidence regarding the gender balance at the company's middle/other management level
12. Professional development and promotion	0.5	PARTIALLY MET: While the company tracks the number of women participating in the professional development programmes offered, it only has 2 programmes aimed at women, 'Women in ABF' a networking programme and the Two-Way Mentoring programme. To fully meet this requirement we expect at least three robust programs aimed at developing women, with participation tracked.
		NOT MET: There is no evidence found to suggest the company collects sex-disaggregated data on percentage of employees promoted.
13. Occupational segregation	0	NOT MET: There is no evidence the company collects sex-disaggregated data on the gender balance of its workforce by occupational function.
14. Turnover and absenteeism	0	NOT MET: There is no evidence the company collects sex-disaggregated data on the annual turnover of employees.
		NOT MET: There is no evidence that company collects sex-disaggregated data on the annual absenteeism levels of employees

SUPPLY CHAIN

Indicator	Score (out of 2)	Assessment
15. Gender equality in leadership in the supply chain	1	NOT MET: There is no evidence that the company collects or requires its suppliers to collect sex-disaggregated data by leadership level across the supply chain.
		MET: The company supports its suppliers in offering professional development opportunities to women workers in the supply chain through its "My Life" and "Sudokkho" programs and tracks the number of participants.
16. Non-discrimination against pregnant and/or married women workers in the supply chain	1	PARTIALLY MET: The company's Supplier Code of Conduct includes a clause prohibiting discrimination against married women, however the non-discrimination policy does not explicitly protect pregnant women.
		NOT MET: There is no evidence that the company requires its suppliers to provide training (e.g. unconscious bias training) to its hiring managers to ensure a non-biased approach to the recruitment and promotion of married / pregnant women workers
		MET: The company supports suppliers through the ETI's Social Dialogue programme in Bangladesh, which strengthens the capacity of worker participation committees and helps workers and management understand their rights and responsibilities. This includes issues such as maternity pay, sexual harassment and wage discrimination .
17. Enabling environment for freedom of association and collective bargaining in the supply chain	2	MET: The company prohibits discrimination against trade union members and representatives.
		MET: The company, through its participation in ACT has committed to adopt the Myanmar Guideline on Freedom of Association (2019) as part of their freedom of association requirements in Myanmar. The company also engaged 12 suppliers' factories in training on the ACT FOA guidelines and 15 factories in the ETI's Social Dialogue programme in Bangladesh strengthens the capacity of worker participation committees, namely women workers whose training covers issues such as maternity pay, sexual harassment and wage discrimination as well as developing soft skills such as public speaking and communication skills.

18. Gender-responsive procurement	1.5	NOT MET: The company has a Sustainable Cotton Programme that includes the education of female cotton farmers. Whilst the company are increasing their use of cotton produced through the programme, it has not made a public commitment to procure this cotton.
		MET: The company has a program in place to source cotton from female famers.
		MET: The company has a program in place to source cotton from female famers and has supported the training of female farmers in sustainable farming methods to increase these farmers' cotton yields and profits.

Compensation and benefits (17.5% of total score)

WORKPLACE

Indicator	Score (out of 2)	Assessment
19. Gender pay gap	0	NOT MET: There is no evidence that the company collects sex-disaggregated pay data globally, but it does collect this data for its UK operations, as required by law.
		NOT MET: There is no evidence that the company collects sex-disaggregated pay data by different pay bands for its global operations, but it does shares the % of men and women in each pay quartile for its UK operations.
		NOT MET: The company does not disclose sex-disaggregated pay data by occupational function
		NOT MET: There is no evidence that the company includes other financial benefits when analysing its gender pay gap, apart from for its UK operations.
		NOT MET: There is no evidence to suggest that the company uses a third party to undertake or verify its gender pay gap analysis.
		NOT MET: The company has created a Diversity and Inclusion Steering Committee but does not yet have a clear strategy or appear to be taking active steps to address any pay gaps identified.
20. Paid carer leave	0	NOT MET: There is no evidence that the company has a global policy of providing at least 14 weeks of paid primary carer leave, for full-time employees.
		NOT MET: There is no evidence that the company implements concrete actions (excluding policies) that promote the return to work and retention of workers after primary care leave.
		NOT MET: There is no evidence that the company has a global policy of providing at least two weeks of secondary carer leave to full-time employees.
		NOT MET: There is no evidence to suggest that the company implements concrete actions that promote the uptake of secondary carer leave.
21. Childcare and other family support	0	NOT MET: There is no evidence that the company offers childcare or other family support to its employees.
22. Flexible work	1	PARTIALLY MET: The company offers flexible working hours to its employees, but there is no evidence that it tracks the uptake.
		PARTIALLT MET: The company offers flexible work locations to its employees, but there is no evidence that it tracks the uptake.

SUPPLY CHAIN

Indicator	Score (out of 2)	Assessment
23. Formal contracts in the supply chain	1.5	MET: The company requires all suppliers to provide workers with written and understandable information about their employment conditions in respect to wages
		PARTIALLY MET: The company provides training to suppliers in Turkey on its policy related to refugees and the remediation process for any refugee workers which are undocumented. However, there is no evidence that it takes other action, such as requiring suppliers to collect sex-disaggregated data by contract type.
24. Living wage in the supply chain	0.5	NOT MET: Whilst the company requires that "living wages are paid" within its supplier code of conduct, the specific requirement is that wages meet at least the national minimum wage, or in the absence thereof an acceptable industry benchmark. The company does state that in any event, wages must always be enough to meet basic needs and to provide some discretionary income, but this does not include providing for dependants.
		NOT MET: There is no evidence to suggest that the company monitors the payment of living wages.
		PARTIALLY MET: Whilst the company has taken action to help ensure its suppliers pay their workers a living wage through being a member of ACT, there is no evidence to suggest that it requires a collective bargaining agreement that addresses the provision of a living wage, have a joint action plan with suppliers to achieve payment of a living wage, provide capacity building training on responsible purchasing practices or conduct living wage assessments in factories.
25. Family-friendly benefits provision in the supply chain	0	NOT MET: The company only requires maternity leave to be paid in accordance with national law, there is no evidence that it requires its suppliers to offer at least 14 weeks of paid primary carer leave to their workers.
		NOT MET: The company only requires benefit leave to be paid in accordance with national law and there is no evidence that requires its suppliers to provide at least two weeks of paid secondary carer leave to their workers.
		NOT MET: There is no evidence to suggest that the company requires its suppliers to provide childcare support to their workers.
		NOT MET: There is no evidence that the company requires its suppliers to provide other family support to their workers.

Health and well-being (17.5% of total score)

WORKPLACE

Indicator	Score (out of 2)	Assessment
26. Health information and services for employees	0	NOT MET: There is no evidence regarding the costs covered for maternal health information and services, in countries where no or only partial government-funded support is provided.
		NOT MET: There is no evidence regarding the costs covered for sexual and reproductive health information and services, in countries where no or only partial government-funded support is provided.
		NOT MET: There is no evidence regarding the costs covered for mental health information and services, in countries where no or only partial government-funded support is provided.
		NOT MET: There is no evidence that the company provides coverage of the costs associated with maternal, sexual and reproductive, or mental health information and services for its employees in the US.

SUPPLY CHAIN

Indicator	Score (out of 2)	Assessment
27. Safe and health work environment in the supply chain	1	NOT MET: The company requires suppliers to address only 1 of the specific health, safety and hygiene needs of their women workers: - Provide access to clean drinking water This is not deemed sufficient to affectively address the needs of women workers.
		NOT MET: There is no evidence that the company monitors supplier adherence to these requirements on the specific health, safety and hygiene needs of their women workers.
		MET: The company requires its suppliers to provide health and safety training to workers. Also, its programme "My Life in South India" supports factories to train vulnerable workers on basic life skills including health and safety in the workplace. The training is particularly targeted at female workers.
28. Health information and services in the supply chain	1	NOT MET: There is no evidence that the company has made a commitment to gender-responsive health information or services in its supply chain.
		NOT MET: Whilst the company does require its suppliers to "provide access to adequate medical assistance and facilities in the event of illness or injury at work" there is no requirement for on-site facilities or a credentialed health provider on-site
		MET: The company supports factories through the BSR Her project, STOP Aim, My Life and My Space. Together these cover: - Menstrual Health - Maternal Health - Family planning - Reproductive cancers - STDs/STIs - Gender-based violence screen - Mental Health

Violence and harassment (17.5% of total score)

WORKPLACE

Indicator	Score (out of 2)	Assessment
29. Violence and harassment prevention	1	PARTIALLY MET: ABF has a whistleblowing policy for reporting malpractices and states in its annual report that it has a clear set of principles that are common to all business operations, one of which is that it does not tolerate sexual, mental or physical harassment in the workplace, however there is no evidence of a standalone policy.
		MET: The company provided training on gender mainstreaming and gender-based violence to its ethical trade team.
		NOT MET: There is no evidence that the company takes additional actions to help prevent violence and harassment in the workplace.
30. Violence and harassment remediation	0	NOT MET: The company has a process for addressing grievances in the workplace, but there is no evidence that it includes any of the specific provisions that would be specifically relevant for addressing violence and harassment cases.

SUPPLY CHAIN

Indicator	Score (out of 2)	Assessment
31. Violence and harassment prevention in the supply chain	1.5	MET: The company requires its suppliers to prohibit all forms of violence and harassment.
		MET: The company has its supplier code of conduct available in multiple languages and requires factories to communicate the code to its workers.
		NOT MET: There is no evidence to suggest the company requires its suppliers to provide training on violence and harassment to its managers and workers.
		MET: The company has a number of programs in its supply chain, such as STOP, that are either wholly focused on preventing violence and harassment or include this within their curriculum.
32. Violence and harassment remediation in the supply chain	0.5	NOT MET: There is no evidence that the company monitors its suppliers' remediation process for addressing violence and harassment grievances, it only monitors remediation of grievances that are surfaced to the company.
		MET: The company requires its suppliers to have an effective remediation process for addressing grievances.
		NOT MET: There is no evidence that the company requires its suppliers to collect sex-disaggregated data on the remediation of violence and harassment grievances reported by their workers.

Marketplace (5% of total score)

MARKETPLACE

Indicator	Score (out of 2)	Assessment
33. Marketing content	0	NOT MET: There is no evidence that the company has a public commitment which addresses how gender stereotypes are portrayed in its marketing campaigns.
		NOT MET: There is no evidence the company has taken specific actions to avoid discriminatory marketing practices.

Community (5% of total score)

COMMUNITY

Indicator	Score (out of 2)	Assessment
34. Community support	2	<p>MET: The company supports or donates to initiatives focused on women's empowerment and gender equality.</p> <p>MET: The company has a program on gender-based violence (GBV) to train ex-factory workers in Yangon.</p> <p>MET: The company tracks the number of ex-workers that were trained in its Myanmar GBV program (50) and the total number of workers "reached" (7,000). The company does not have evidence that it tracks the donations going to charities that benefit women and girls.</p> <p>MET: The company has included a quote from a female worker who participated in the programme, demonstrating it must collect feedback.</p>

NB: "NOT MET" in the assessment above indicates WBA could not find information in public sources or the internal documents shared by the company to show that the company meets the requirements, as described in full in the Gender Benchmark Methodology Report 2020 and Scoring Guidelines 2021. This does not necessarily mean that the company is not taking any action under that indicator.