

Company Name Associated British Foods
Industry Agricultural Products (Supply Chain and Own Operations) & Apparel (Supply Chain only)
Overall Score 15.4 out of 100

Theme Score	Out of	For Theme
1.3	10	A. Governance and Policies
4.4	25	B. Embedding Respect and Human Rights Due Diligence
1.0	20	C. Remedies and Grievance Mechanisms
5.7	25	D. Performance: Company Human Rights Practices
3.1	20	E. Performance: Responses to Serious Allegations

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2022 Methodology document for the sector concerned. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: General HRs commitment: The Company states in its Modern Slavery Statement 2021: 'We are wholly committed to respecting human rights across our own operations, supply chains and products including but not limited to issues of Modern Slavery'. However, this document is no longer considered suitable source for policy statements according to CHRB's revised approach. On the other hand, the Company states in its Annual Report 2021: 'as a Group we have policies that set out our standards with respect to human rights, such as our Supplier Code of Conduct and our Speak Up Policy.' However, no formal statement of commitment to respect human rights according to CHRB wording criteria was found in these policies'. In addition, the Company's subsidiaries have developed their own Human Rights Policies or Code of Conducts. For instance, Twinings Ovaltine's Human Rights Policy reads: 'We recognise that it is our responsibility to respect human rights and avoid adverse impacts, in line with the UN Guiding Principles on Business and Human Rights', or Human Rights Policy for Primark: 'We are committed to enact the United Nations (UN) Guiding Principles on Business and Human Rights, and in doing so, we are guided in particular by the OECD Guidelines for Multinational Enterprises, the Universal Declaration of Human Rights, and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work'. However, it is not clear whether all group companies are covered by similar human rights policy commitments. As indicated, No Group-wide formal statement of commitment was found that meets the CHRB document and wording criteria. [Modern Slavery Statement 2021, 2021: media.business-humanrights.org] & [Twining Human Rights Policy, 06/2020: sourcedwithcare.com] • Not Met: Universal Declaration of Human rights (UDHR)

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: International Bill of Human Rights Score 2 • Not Met: Commitment to the UNGPs: It also indicates (Modern Slavery statement) that it aligns its' approach to the UN Guiding Principles on Business and Human Rights'. However, this document is no longer considered a suitable source for policy statement according to CHRB's revised approach . In addition, the Company's subsidiaries have developed their own Human Rights Policies or Code of Conducts. For instance, Twinings Ovaltine's Human Rights Policy reads: 'We recognise that it is our responsibility to respect human rights and avoid adverse impacts, in line with the UN Guiding Principles on Business and Human Rights', or Human Rights Policy for Primark: 'We are committed to enact the United Nations (UN) Guiding Principles on Business and Human Rights, and in doing so, we are guided in particular by the OECD Guidelines for Multinational Enterprises, the Universal Declaration of Human Rights, and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work'. However, it is not clear whether all group companies are covered by similar human rights policy commitments. As indicated, No Group-wide formal statement of commitment was found that meets the CHRB document and wording criteria. [Modern Slavery Statement 2021, 2021: media.business-humanrights.org] & [Primark Supply Chain Human Rights Policy, 03/2022: primark.a.bigcontent.io] • Not Met: Commitment to the OECD Guidelines for Multinational Enterprises: As above
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	0.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Company has a commitment to the ILO Core: In its Annual Report 2019, the Company indicated: 'We recognise the United Nations Guiding Principles on Business and Human Rights and aim to adhere to the core ILO conventions and all relevant laws relating to working conditions and environment'. However, 'aiming to adhere' is not considered a formal statement of commitment according to CHRB wording criteria. Also, the Modern Slavery Statement 2021, states that 'Our comprehensive group-wide Supplier Code of Conduct [...] is based on the eight core labour conventions (which cover collective bargaining, forced labour, child labour and discrimination) of the ILO and the Ethical Trade Initiative (ETI) Base Code'. However, this document is no longer considered a suitable source for policy statement according to CHRB's revised approach. In addition, the Company's subsidiaries have developed their own Human Rights Policies or Code of Conducts. For instance, Primark's Supply Chain Human Rights Policy reads: 'We are committed to enact the United Nations (UN) Guiding Principles on Business and Human Rights, and in doing so, we are guided in particular by [...] the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.' However, it is not clear whether all group operations are covered by ILO commitments, even if by Company's divisions. [Annual Report 2019, 2019: abf.co.uk] & [Primark Supply Chain Human Rights Policy, 03/2022: primark.a.bigcontent.io] • Not Met: Company has a explicit commitment to All four ILO Core: See above. Score 2 • Met: Company expect suppliers to commit to ILO Core: The Company commits to each ILO core in its Supplier Code of Conduct (See below). [Supplier code of conduct, N/A: abf.co.uk] • Met: Company explicitly list All four ILO for suppliers: The Company commits to each ILO core in its Supplier Code of Conduct, including discrimination, forced labour, child labour, freedom of association and collective bargaining. In relation to freedom of association and collective bargaining, the Company states that 'Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively'. [Supplier code of conduct, N/A: abf.co.uk]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Commitment to respect H&S of workers: The Company has a specific health and safety policy including commitment to 'providing a safe and healthy workplace to protect all employees, contractors, visitors and the public from foreseeable work hazards'. The policy contains a list of specific safety-related commitments. [Health and safety policy, N/A: abf.co.uk] • Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week: Although the Company has provided feedback to CHRB in relation to this indicator, the source was already in use.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Expect suppliers to commit to H&S of their workers: The supplier code contains requirements regarding health and safety [Supplier code of conduct, N/A: abf.co.uk] • Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: The Company indicates in its Supplier Code: 'Working hours comply with national laws and benchmark industry standards, whichever affords greater protection. In any event, workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every seven-day period on average. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate'. [Supplier code of conduct, N/A: abf.co.uk]
A.1.3.a.AG	Commitment to respect human rights particularly relevant to the industry – land, natural resources and indigenous peoples' rights (AG)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Respect land ownership and natural resources as set out in VGGT • Not Met: Respect land ownership and natural resources as set out in The IFC Performance Standards • Not Met: Respecting indigenous peoples' rights or ILO Convention No.169 or UN Declaration • Not Met: Expecting suppliers to make these commitments <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Respecting the right to water: The Company indicates in its Environmental Policy: 'Our approach to environmental stewardship includes: Managing our emissions to air, releases to water and landfill of solid wastes so that we do not pollute; [...] Promoting the efficient use of natural resources, especially energy and water, in our operations and supply chain; [...] Monitoring, auditing and reporting our environmental performance, particularly in energy and water consumption, [...]'. However, no evidence found of formal commitment to respect the right to access to safe water. [Environmental Policy, N/A: abf.co.uk] • Not Met: Company's policy commits to obtain FPIC • Not Met: Expecting suppliers to make these commitments <p>: The Supplier code of conduct contains the following commitment: 'we adhere to the principle of free, prior and informed consent of all communities when acquiring land. The rights of communities and traditional peoples to maintain access to land and natural resources will be recognised and respected'. However, no evidence found in relation to the right to water. [Supplier code of conduct, N/A: abf.co.uk]</p>
A.1.3.b.AG	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (AG)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Women's rights: In the Human Rights Policy from Twinings, one of the Company's subsidiaries, it indicates: 'We recognise our responsibility towards specific vulnerable groups, including women, children and migrants'. However, no policies stating the commitment representing all agricultural activities were found. [Twining Human Rights Policy, 06/2020: sourcedwithcare.com] • Not Met: Children's rights: See above [Twining Human Rights Policy, 06/2020: sourcedwithcare.com] • Not Met: Migrant worker's rights: See above [Twining Human Rights Policy, 06/2020: sourcedwithcare.com] • Not Met: Expects suppliers to respect at least one of these rights: In its supplier code, it is stated that 'child labour shall not be used'. In addition, some of its subsidiaries also have such a requirement in their own Code of Conduct, such as Illovo Sugar: 'Illovo does not permit the use of any form of forced labour or child labour in any of its operations, or by any of its Suppliers, all of whom are required to comply strictly with the Illovo Child Labour and Forced Labour Guidelines'. However, CHRB requires companies to expect a commitment from its suppliers to respecting children's rights and not only to prohibit child labour. No evidence found in relation to women's rights and the rights of migrant workers either. [Supplier code of conduct, N/A: abf.co.uk] & [Illovo Sugar Code of Conduct, N/A: illosugarafrika.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: CEDAW/Women's Empowerment Principles: In the Human Rights Policy from Twinings, one of the Company's subsidiaries in the Food Industry, it indicates: 'The Twinings Ovaltine Human Rights Policy is informed by [...], the UN Convention on the Elimination of All Forms of Discrimination against Women, [...], and the UN Women's Empowerment Principles'. However, no policies stating the commitment representing all agricultural activities were found. In addition, 'to be informed' is not considered a formal statement of commitment according to CHRB wording criteria. [Twining Human Rights Policy, 06/2020: sourcedwithcare.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Child Rights Convention/Business Principles: In the Human Rights Policy from Twinings, one of the Company's subsidiaries in the Food Industry, it indicates: 'The Twinings Ovaltine Human Rights Policy is informed by [...], the UN Convention on the Rights of the Child [...] as well as the Children's Rights and Business Principles'. However, no policies stating the commitment representing all agricultural activities were found. In addition, 'to be informed' is not considered a formal statement of commitment according to CHRB wording criteria. [Twinning Human Rights Policy, 06/2020: sourcedwithcare.com] • Not Met: Convention on migrant workers: In the Human Rights Policy from Twinings, one of the Company's subsidiaries in the Food Industry, it indicates: 'The Twinings Ovaltine Human Rights Policy is informed by [...], the UN Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families'. However, no policies stating the commitment representing all agricultural activities were found. In addition, 'to be informed' is not considered a formal statement of commitment according to CHRB wording criteria. [Twinning Human Rights Policy, 06/2020: sourcedwithcare.com] • Not Met: Expecting suppliers to respect these rights
A.1.3.AP	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (AP)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Women's rights: Some of the Company's subsidiaries are working to protect vulnerable people including children, women and migrants. Examples of this work can be found in Primark Modern Slavery Statement 2021. However, CHRB requires a formal commitment statement to respect children's rights, women's rights or the rights of migrant workers. No such commitment found in a suitable policy document on behalf all company's divisions. [Primark MSA 2021, 03/2022: primark.a.bigcontent.io] • Not Met: Children's rights • Not Met: Migrant worker's rights • Not Met: Expects suppliers to respect these rights: In its supplier code, it is stated that 'child labour shall not be used'. However, CHRB requires companies to expect a commitment from its suppliers to respecting children's rights. No evidence found in relation to women's rights and the rights of migrant workers either. [Supplier code of conduct, N/A: abf.co.uk] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: CEDAW/Women's Empowerment Principles • Not Met: Child Rights Convention/Business Principles • Not Met: Convention on migrant workers • Not Met: Expecting suppliers to respect these rights
A.1.4	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: The Company commits to remedy: Although the Company reports in its MSA 2021 how it works 'with suppliers towards the provision of remedy or those workers whose rights have been negatively impacted' as part of its due diligence process, no formal statement committing to remedy was found. Similar information can be found in documents from some of its subsidiaries such as Primark or AB Sugar. For instance, Primark Supply Chain Human Rights Policy reads: 'An important part of our supply chain due diligence is ensuring that workers are provided with remedy where issues arise with reference to our Code of Conduct.[...] Proactively we also seek solutions to issues that we may not have found ourselves, but to which we have been alerted by workers or their representatives, industry initiatives or by other external stakeholders. Although ultimate responsibility for delivering this remedy lies with the supplier at the enterprise or factory level, we are committed to bringing our influence and expertise to bear to help prevent, mitigate, and rectify issues affecting the delivery of workers' rights.' AB Sugar reports in its MSA 2021: 'As contained in ABF's Supplier Code of Conduct, where our businesses identify indicators or proven incidences of modern slavery in our supply chain, we will work with the relevant supplier(s) on a case by case basis to implement effective time-bound remediation measures to address them. If compliance with the code is suspected or proven to have been breached by any supplier, we reserve the right to request open and effective cooperation with verification, subsequent corrective remedial actions as well as the final option to terminate the commercial agreement.' However, no formal commitment statement in a suitable policy document covering all company's division was found (or different policies from all Company's divisions) [Modern Slavery Statement 2021, 2021: media.business-humanrights.org] & [Primark Supply Chain Human Rights Policy, 03/2022: primark.a.bigcontent.io] • Not Met: Company expect suppliers to make this commitment: See above

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> • Not Met: Collaborating with other remedy initiatives • Not Met: Work with suppliers to remedy impact: See above
A.1.5	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Zero tolerance attacks on HRs Defenders (HRDs): In the Human Rights Policy from Twinings, one of the Company's subsidiaries, it indicates: 'We commit to upholding the rights of human rights defenders, and those expressing their right to freedom of association, expression, peaceful assembly and protest.' However, no policy stating the commitment on behalf the whole group was found. [Twining Human Rights Policy, 06/2020: sourcedwithcare.com] • Not Met: Company expect suppliers to make this commitment Score 2 <ul style="list-style-type: none"> • Not Met: Work with HRD to create safe and enabling environment

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Board level responsibility for HRs • Not Met: Describe HR expertise of Board member Score 2 <ul style="list-style-type: none"> • Met: Speeches/letters by Board members or CEO: The Company indicates in its MSA 2021: 'In June 2021, the Business Against Slavery Forum coalition hosted a Ministerial Forum at which the chief executives of member companies discussed relevant issues with ministers. Our Chief Executive, George Weston, attended this event and contributed to discussions on several themes, including the UK Government's forthcoming Modern Slavery Strategy Review, the challenges involved in modern slavery due diligence and how to approach transparency and other levers for positive change.' [Modern Slavery Statement 2021, 2021: media.business-humanrights.org]
A.2.2	Board responsibility	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Board/Committee review HRs strategy: The Company discloses information about 'How the Board engages and/or is kept informed and takes matters into account' with respect different topics, including supply chain matters: 'Senior management of each business division (often with the assistance of specialists from within that division) regularly report to the Board on key relationships and projects with suppliers either as part of their business updates to the Board or through reports to the Chief Executive. [...] Examples of key matters or projects on which the Board was briefed include: [...] modern slavery and human rights, including approval of the Modern Slavery and Human Trafficking Statement'. Also 'The Group Safety and Environment manager provides the Board with updates on safety trends and progress against key performance indicators, supplemented by updates from the divisions'. [Annual Report 2021, 2021: abf.co.uk] • Not Met: Examples/trends re HR discussion in the last reporting period: As indicated above: 'Examples of key matters or projects on which the Board was briefed include: [...] modern slavery and human rights, including approval of the Modern Slavery and Human Trafficking Statement'. It is not clear if a board committee has discussions on specific topics. Current evidence refers to the Board (not a board committee) being briefed about modern slavery related topics. [Annual Report 2021, 2021: abf.co.uk] Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: How affected stakeholders/HR experts informed discussions
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Incentives for at least one board member: The Company indicates in its Annual Report 2021 that its Short Term Incentive Plan includes a Personal Performance metrics: 'Aligned to key business health and business performance goals, including ESG measures'. However, no further information describing which ESG measures are taken into account was found. [Annual Report 2021, 2021: abf.co.uk] • Not Met: At least one key HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other board performance criteria

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.4	Business model strategy and risks	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Board process to review business model and strategy: The Company has provided feedback to CHRB regarding this datapoint, but it was not material. • Not Met: Describe frequency and triggers for reviewing Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Example of actions decided

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Score of 1 on A.1.2.a: See indicator A.1.2.a • Met: Senior responsibility for HR implementation and decision making: According to its Annual Report 2021: 'The Director of Legal Services and Company Secretary has overall accountability to the Chief Executive for corporate responsibility issues and acts as the focal point for communications to the Board and with shareholders on corporate responsibility matters. The Group Corporate Responsibility Director, who reports to the Director of Legal Services and Company Secretary, is responsible for monitoring climate-related activities across the Group and for reviewing the robustness of external non-financial targets set by each of our businesses. She leads the Corporate Responsibility Hub, which supports all our businesses on environmental and human rights issues and brings together all the professionals in our businesses working in these areas to share knowledge and best practice'. [Annual Report 2021, 2021: abf.co.uk] Score 2 <ul style="list-style-type: none"> • Not Met: How it assigns Day-to-day responsibility • Not Met: Day-to-day resources and expertise allocation in own ops • Not Met: Resources and expertise allocation in the supply chain: The Company reports about Primark Ethical Trade and Environmental Sustainability team on its website section 'People': 'We employ over 130 local people in our Ethical Trade and Environmental Sustainability team. Between them they visit every factory we work with at least once a year to conduct face-to-face audits'. However, no further information regarding other divisions (i.e evidence that shows how all the Company groups allocate resources to the supply chain). [Primark - People, N/A: corporate.primark.com]
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Senior manager incentives for human rights • Not Met: At least one key HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other senior management performance
B.1.3	Integration with enterprise risk management	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: HR risks is integrated as part of enterprise risk system: The Company indicates that: 'Our businesses perform risk assessments which consider materiality, risk controls and specific local risks relevant to the markets in which they operate. The collated risks from each business are shared with the respective divisional chief executives who present their divisional risks to the Group Executive. [...] These risks are identified, as part of the overall risk management process, through a variety of horizon-scanning methods including geopolitical insights; ongoing assessment of competitor activity and market factors; workshops and management meetings focused on risk identification; analysis of existing risks using industry knowledge and experience to understand how these risks may affect us in the future; and representation and participation in key industry associations. [...] Group functional heads [...] also provide input to this process, sharing with the Director of Financial Control their view of key risks and what activities are in place or planned to mitigate them'. In addition, in its MSA 2021: 'Within individual businesses, responsibility and accountability for risk management sits with their chief executive. They produce risk mitigation plans for all types of business risk, including safety, environment and other material responsibility issues that are reviewed annually by our Board'. Human rights issues is included among the principal risks and uncertainties in the Company's Annual Report 2021.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>[Annual Report 2021, 2021: abf.co.uk] & [Modern Slavery Statement 2021, 2021: media.business-humanrights.org]</p> <ul style="list-style-type: none"> • Met: Provides an example: As indicated above, Human rights issues is included among the principal risks and uncertainties in the Company's Annual Report 2021: 'we are managing risks to our business and to all those involved in our supply chains, and so we expect that our supply chain partners will work within the same framework as us. We work with our supply chain partners to help them meet our standards of acceptable working conditions, financial stability, ethics and technical competence. Potential supply chain and ethical business practice risks include: the vulnerability of workers in our supply chains and the amplification of this as a result of the ongoing impacts of COVID-19; inconsistent adoption of a rigorous human rights due diligence approach across the Group; and low transparency of Group human rights impact. [Annual Report 2021, 2021: abf.co.uk] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Score of 1 on A.1.2.a: See indicator A.1.2.a • Not Met: Communicates its policy to all workers in own operations: The Company indicates in its MSA 2021: 'One of the major areas of focus for our businesses over the last six years has been for them to train their people and raise their awareness of modern slavery issues. Last year, we developed a new online training module designed to raise awareness of modern slavery. The course seeks to educate on modern slavery and forced labour, providing real-life examples and highlighting the importance of managing known risks. The course also outlines how those operating in our supply chain can help to address the risk of modern slavery and human trafficking. A number of our businesses have created tailored training to raise awareness with different stakeholder groups.' In addition, in its Annual Report 2021: 'In collaboration with Twinings, we developed an online ethical training module designed to raise awareness of modern slavery. The training seeks to educate our people about modern slavery and forced labour, providing real-life examples and highlighting the importance of managing known business risks. The training also outlines how those operating in our supply chain can help to keep it free from modern slavery. This training was made available to all our businesses and, since it was launched, has been completed by almost 1,000 employees. A number of our businesses have created tailored training to raise awareness. For example: all newly appointed Westmill employees with recruitment responsibility completed the Stronger2gether e-learning training within their first three months in role; AB Agri trained nearly 200 transport managers, commercial teams and delivery drivers (who visit more than a thousand farms across the UK every year) to recognise the signs of modern slavery and forced labour; AB Sugar created online training to raise awareness of the potential for modern slavery in their supply chain and to provide staff with advice on how to act on concerns, such as contacting independent whistleblowing hotlines. AB Sugar is currently exploring how the training can be shared with suppliers. So far, over 75% of those employees invited have completed the training; and this year Jordans Dorset Ryvita completed their first face-to-face supplier training on modern slavery, with traders for their Turkish commodities, and rolled out an online e-learning module in modern slavery beyond the buying team to over 50 colleagues in sales and marketing'. However, the training seems to be focused on modern slavery. No further information was found describing how human rights policy commitments are communicated to all Company's employees, including local languages where necessary. [Modern Slavery Statement 2021, 2021: media.business-humanrights.org] & [Annual Report 2021, 2021: abf.co.uk] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communication of policy commitments to stakeholder • Not Met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Meets ILO requirement for suppliers on A.1.2.a: See indicator A.1.2.a • Met: Requires suppliers to communicate policy requirements: The Code of Conduct for suppliers states that 'suppliers and representatives should comply with and seek to develop relationships with their own supply chains consistent with the principles set out below and should be compliant with all local laws and the following principles as a minimum'. The Supplier Code of Conduct includes human rights commitments. In its Modern Slavery Statement 2021, the Company also states 'Businesses [Company's subsidiaries] are required to get their suppliers to sign and ensure adherence to this Code'. The annual report 2021 states that

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>'suppliers are expected to sign and abide by this code'. Also, 'procurement and operational teams establishing strong working relationships with suppliers to help them meet our standards'. [Supplier code of conduct, N/A: abf.co.uk] & [Modern Slavery Statement 2021, 2021: media.business-humanrights.org]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: According to its Annual Report 2021: 'Suppliers are expected to sign and abide by this Code. [Supplier Code]. Adherence to the Code is verified through our supplier audit system with our procurement and operational teams establishing strong working relationships with suppliers to help them meet our standards.' [Annual Report 2021, 2021: abf.co.uk] • Not Met: Company requires suppliers to cascade down to their suppliers: The Supplier Code of Conduct indicates that 'suppliers and representatives should comply with and seek to develop relationships with their own supply chains consistent with the principles set out [...] and should be compliant with all local laws and the following principles as a minimum'. Similarly, Primark, one of its subsidiaries, include the following provision in its Supplier Code: 'Primark's terms and conditions of trade make clear that our suppliers are responsible for ensuring compliance with the terms of our Code of Conduct in their supply chain.' However, no evidence that the company, including all its subsidiaries, requires the supplier to cascade the contractual or other binding requirements down their supply chain. [Supplier code of conduct, N/A: abf.co.uk] & [Primark Supplier Code of Conduct Update 2019, 12/2019: primark.a.bigcontent.io]
B.1.5	Training on Human Rights	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a • Met: How workers are trained on HR policy commitments: The Company indicates in its MSA 2021: 'One of the major areas of focus for our businesses over the last six years has been for them to train their people and raise their awareness of modern slavery issues. Last year, we developed a new online training module designed to raise awareness of modern slavery. The course seeks to educate on modern slavery and forced labour, providing real-life examples and highlighting the importance of managing known risks. The course also outlines how those operating in our supply chain can help to address the risk of modern slavery and human trafficking. A number of our businesses have created tailored training to raise awareness with different stakeholder groups'. [Modern Slavery Statement 2021, 2021: media.business-humanrights.org] • Met: Trains relevant managers including procurement: The Company indicates in its Responsibility update 2021: 'Colleagues closest to our supply chains are doing more to help the businesses fully understand the complexities of their supply chains and other aspects of sustainability. Group functions are also supporting by offering them specialist advice and training resources. These resources include expanded modern slavery awareness training, which over 1,000 people have completed since it was launched, and a new online learning package delivered in 2021 to support the implementation of our Supplier Code of Conduct. [...] We have run procurement conferences for many years, in Europe, Asia and North America. Our groupwide procurement conference in October 2020 included several sessions focused on responsible sourcing. At an online conference in June 2021, more than 170 participants attended an ESG (Environmental, Social and Governance) session, led by our Group Corporate Responsibility Director, Katharine Stewart. The conference also included briefings on climate change, including the use of expenditure data to calculate greenhouse gas emissions, human rights and due diligence and sustainable packaging.' [Responsibility Update 2021, 2021: abf.co.uk] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a: See indicator A.1.2.a • Met: Meets both requirements under score 1 • Met: Trains suppliers to meet company's HR commitment: Some of the Company's subsidiaries report actions to train its suppliers in topics related to its Human Rights commitments. For instance, Primark MSA 2021 reports: 'We deliver training through dedicated training seminars for suppliers and workers and through specialised programmes designed to promote awareness and mitigate and prevent risks. [...] This training includes the following topics: Grievance mechanism, Code of Conduct overview, health and safety, gender, worker health & wellbeing, forced labour, social audit requirements. AB Sugar also reports in its We listen, we act, we remedy toolkit document: 'As part of its education programme, the team partnered with Stronger2Gether (S2G), an independent NGO aiming to reduce modern slavery within supply chains. S2G have supported the team with running a series of training sessions with the growers and contractors which covered off modern slavery

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>principles and standards that they are required to meet'. [AB Sugar_We listen, we act, we remedy Toolkit, 2020: absugar.com] & [Primark MSA 2021, 03/2022: primark.a.bigcontent.io]</p> <ul style="list-style-type: none"> • Not Met: Disclose % trained
B.1.6	Monitoring and corrective actions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a • Not Met: Monitoring implementation of HR policy commitments across global ops and supply chain: According its Responsibility Update 2022: 'Some of our businesses use collaborative online data platforms to gather and share information about their supply chains and suppliers, for example SEDEX. To help the businesses review relevant data about their suppliers on SEDEX more efficiently, our UK Grocery division has created a new team of data specialists to support with monitoring and reporting. [...] Our membership of AIM-Progress, a voluntary collaboration of over 40 European businesses that aims to promote responsible supply chains and address human rights in them, also supports greater transparency. Some of our businesses use AIM-Progress to access shared supplier audits, removing the need for them to carry out their own'. However, no information describing how it monitors its own operations was found. [Responsibility Update 2021, 2021: abf.co.uk] & [Supplier code of conduct, N/A: abf.co.uk] • Not Met: Proportion of supply chain monitored • Not Met: Describe how workers are involved in monitoring: Primark, Company's subsidiary, indicates in its MSA 2021: 'Workers in the supply chain are rights-holders yet are often excluded from the due diligence process or face obstacles in getting their voices and views heard. We have developed specific tools and methods to support worker voice, such as Drawing the Line, used successfully in Myanmar and India. Drawing the Line is a participatory method to engage groups of workers on a discussion on their unmet needs in the workplace, and how they can approach securing those needs. In Bangladesh, the Soromik er Kotha programme used community networks to establish contact with 400 workers and gather regular anonymous feedback on key issues including health and safety in the workplace and payment of wages'. However, this indicator looks for evidence of how Company workers are involved in the monitoring process (how they are part of the monitoring work) [Primark MSA 2021, 03/2022: primark.a.bigcontent.io] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a: See indicator A.1.2.a • Not Met: Describes corrective action process: Primark describes its actions to respond to reports of human rights abuses in the Xinjiang Uyghur Autonomous Region of China (XUAR): 'Our initial response to the situation in Xinjiang began in October 2019, when we made the decision to end our relationship with the only factory from which we sourced finished goods in the XUAR (out of 525 factories in China as a whole). We did this because we no longer felt we could carry out the robust due diligence which we had previously been able to. After ending our relationship with the factory, we continued to attempt to monitor the situation in the XUAR through local intelligence, human rights experts and other collaborative forums. This led to our decision in September 2020 to instruct all our suppliers to cease all sourcing of anything that goes into making a Primark product – including cotton and non-cotton fabric, fibres, and all other materials and labour – from the XUAR. We believe our position is appropriate and proportionate given the reports which have emerged regarding alleged human rights abuses and the use of forced labour in Xinjiang, and because we are unable to undertake the due diligence or auditing that we would normally carry out when such claims emerge. In response to reports regarding alleged human rights abuses and the use of forced labour in the XUAR, we have taken the decision to double the number of audits we conduct in other regions of China as an additional safeguard.' However, no further information describing the corrective action process regarding the whole group was found. This indicator looks for the standard process it has in place to implement corrective action plans where non-compliances are found as part of the monitoring process. • Not Met: Disclose findings and number of corrective action
B.1.7	Engaging and terminating business relationships	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: HR affects selection of suppliers: In its response to the "Inquiry into Xinjiang Detention Camps", Primark (subsidiary) indicates: 'Primark has a Code of Conduct for suppliers, which is in turn based on the Base Code of the Ethical Trading Initiative, of which Primark is a member with 'Leadership' status. [...]. All factories wishing to supply Primark are audited prior to any Primark orders being

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>placed, and over half of the factories presented to us for approval are not successful on the first attempt. Once approved, they are re-audited at intervals of no greater than 12 months thereafter. [...] We maintain a 'rating matrix' to list and assess the risks encountered by workers in factories, grouped by the clauses of our Code. We review this matrix from time to time with external stakeholders for completeness. By comparing and rating the findings of our audits against this matrix we send instructions to our commercial teams indicating where risks are highest, or where conditions are more favourable. This in turn guides sourcing decisions: Primark only allows orders into new factories if the conditions are acceptable'. However, it is not clear whether human rights performance affects selection of new suppliers covering all the other Company's divisions.</p> <p>[Primark: Inquiry into Xinjiang Detention Camps, 11/2020: committees.parliament.uk]</p> <ul style="list-style-type: none"> • Met: HR affects on-going supplier relationships: In its suppliers' code of conduct the Company has indicated that 'in the event that we become aware of any actions or conditions not in compliance with the Code, we reserve the right to request corrective actions. ABF reserves the right to terminate an agreement with any supplier and representatives that does not comply with the Code'. [Supplier code of conduct, N/A: abf.co.uk] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe positive incentives offered to respect human rights • Met: Working with suppliers to meet HR requirements: The Company discloses information in its MSA 2021 on how some of its business work with its suppliers to improve human rights performance: 'Primark has been running its Ethical Trade and Environmental Sustainability programme for over 10 years and this includes a range of programmes that seek to help workers in its supply chain understand their rights at work. A dedicated team manages these programmes, working closely with local teams, NGOs and other organisations to design and deliver them. Examples of Primark's work include the following programmes: [...] In Bangladesh, Primark partners with the ETI on a social dialogue programme. The programme strengthens the capacity of worker participation committees and helps workers and management understand their rights and responsibilities. The project has reached more than 25,000 workers and managers in fifteen factories. [...] This year, JDR [Jordans Dorset Ryvita] completed its face to face supplier training on modern slavery, which focused on traders for its commodities sourced from Turkey'. [Modern Slavery Statement 2021, 2021: media.business-humanrights.org]
B.1.8	Approach to engagement with affected stakeholders	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years: The Company indicates in its Annual Report 2021: 'At a Group level we engage with a variety of stakeholder groups including shareholders, governments, media and investors. Also as part of daily business activities and through structured processes, our businesses routinely engage with customers, suppliers, regulators and industry bodies.' It also discloses information on how it engage with its different stakeholders, including employees, suppliers, communities and NGOs. However, no further information describing how the Company identifies its stakeholders or how it engages with affected or potentially affected stakeholders was found. [Annual Report 2021, 2021: abf.co.uk] • Not Met: Discloses stakeholders that HRs may be affected • Met: Provides two examples of engagement with stakeholders: One of its subsidiaries, Primark, report in its MSA 2021: 'We have developed specific tools and methods to support worker voice, such as Drawing the Line, used successfully in Myanmar and India. Drawing the Line is a participatory method to engage groups of workers on a discussion on their unmet needs in the workplace, and how they can approach securing those needs. In Bangladesh, the Soromik er Kotha programme used community networks to establish contact with 400 workers and gather regular anonymous feedback on key issues including health and safety in the workplace and payment of wages'. In addition, Twinings, another subsidiary, indicates in its Progress report 2021: 'Our Twinings Community Needs Assessment (TCNA) framework has been created in consultation with expert organisations to help us assess and understand communities' needs on the ground. The process we undertake with communities is holistic, participatory and inclusive. Assessments are carried out on a rolling basis every two to three years by our Social Impact team, covering housing, water and sanitation, health and nutrition, gender, children's rights, labour standards, natural resources and income. For smallholder farmers, the TCNA also incorporates farming practices and land rights.' [Primark MSA 2021, 03/2022: primark.a.bigcontent.io] & [Twinings Progress Report 2021, 2021: sourcedwithcare.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HR issues • Not Met: Describe how views influenced company's HR approach

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Identifying risks in own operations: The Company indicates in its MSA 2021: 'Some of our businesses have undertaken a risk assessment process to understand which supply chains may be at higher risk of modern slavery. This may be due to the country of origin, the product or industry characteristics (such as seasonal cycles) or workforce characteristics (such as migrant workers). They continue to develop action plans for supply chains that may be at higher risk of forced labour. For example, Twinings undertook a human rights assessment of its whole operations and mapped the value chain against human rights risks, considering how each group could be negatively impacted. For the non-Retail businesses, the current risk assessment is supplemented with access to the Supplier Ethical Data Exchange (Sedex) and Maplecroft's risk assessment tool, which provides insight into some of our supply chains and suppliers with the highest risk. The risk of modern slavery is not confined to our supply chains, so we also pay particular attention to our own hiring practices.' However, no further information describing how the Company identifies human rights risks in own operations was found. Although the Company indicates that Twinings undertook a process, no details found about it (this sub indicator can be awarded if evidence refers to a specific activity). Previous assessment was based on "Corporate Responsibility 2018", dated 2018, which is now out of the three-year timeframe that the methodology requires. [Modern Slavery Statement 2021, 2021: media.business-humanrights.org] • Met: Identifying risks through relevant business relationships: The Company indicates in its MSA 2021: 'Some of our businesses have undertaken a risk assessment process to understand which supply chains may be at higher risk of modern slavery. This may be due to the country of origin, the product or industry characteristics (such as seasonal cycles) or workforce characteristics (such as migrant workers). They continue to develop action plans for supply chains that may be at higher risk of forced labour. For example, Twinings undertook a human rights assessment of its whole operations and mapped the value chain against human rights risks, considering how each group could be negatively impacted. For the non-Retail businesses, the current risk assessment is supplemented with access to the Supplier Ethical Data Exchange (Sedex) and Maplecroft's risk assessment tool, which provides insight into some of our supply chains and suppliers with the highest risk. The risk of modern slavery is not confined to our supply chains, so we also pay particular attention to our own hiring practices'. In addition, Primark indicates in its MSA 2021: 'We conduct on-going due diligence to identify human rights risks, including modern slavery, in our supply chain. Our process aligns with the UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Supply Chains and is the result of in-depth benchmarking and consultation with human rights organisations.' Although the Company reports description regarding only Twinings and Primark, this sub indicator can be awarded if evidence is provided for a specific activity, business or location. [Modern Slavery Statement 2021, 2021: media.business-humanrights.org] & [Primark MSA 2021, 03/2022: primark.a.bigcontent.io]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts: Primark's due diligence process includes the following components: Country risk assessments, Analysis from internal data, Structural integrity, Heightened assessments for critical or severe risks, Rights holder consultation and worker engagement, Stakeholder consultation. With respect the last two component, its MSA 2021 reads: 'Workers in the supply chain are rights-holders yet are often excluded from the due diligence process or face obstacles in getting their voices and views heard. We have developed specific tools and methods to support worker voice, such as Drawing the Line, used successfully in Myanmar and India. Drawing the Line is a participatory method to engage groups of workers on a discussion on their unmet needs in the workplace, and how they can approach securing those needs. In Bangladesh, the Soromik er Kotha programme used community networks to establish contact with 400 workers and gather regular anonymous feedback on key issues including health and safety in the workplace and payment of wages.[...] External stakeholders are a vital source of information and guidance to help us understand the risk of modern slavery in our supply chains, how to identify it, and which groups may be most vulnerable. Their insight and knowledge are invaluable. Stakeholders include civil society groups, trade unions, governments, international agencies, intergovernmental agencies, multi-stakeholder initiatives (MSIs), and legal experts.' However, no further information found, including whether there are processes covering all Company's activities. [Primark MSA 2021, 03/2022: primark.a.bigcontent.io] • Not Met: Triggered by new circumstances • Not Met: Describes risks identified
B.2.2	Assessing human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describe process for assessment of HR risks and discloses salient HR issues: The Company indicates in its Annual Report 2021: 'In line with the decentralised nature of the Group, human rights matters are primarily managed by our individual businesses. This also enables the most salient human rights risks to be tackled most effectively by those who best understand the local context.' In addition, in Twinings Ovaltine's Human Rights Position Statement 2021, the Company reports assessing its supply chain. No further evidence found, including the processes in place to conduct human rights risks/impacts assessment in covering all businesses of the Company (direct owned operations). Previous assessment was based on "Corporate Responsibility 2018", dated 2018, which is now out of the three-year timeframe that the methodology requires. [Annual Report 2021, 2021: abf.co.uk] • Not Met: How process applies to supply chain: The Company indicates in its Annual Report 2021: 'In line with the decentralised nature of the Group, human rights matters are primarily managed by our individual businesses. This also enables the most salient human rights risks to be tackled most effectively by those who best understand the local context'. In addition, in Twinings Ovaltine's Human Rights Position Statement 2021, the Company reports: 'To ensure that our Social Impact Team's work targets the key issues and regions in our supply chain, in 2017 we undertook our first independent company-wide human rights risk assessment. We worked with a third party who helped us map the key human rights risks outlined in the International Bill of Human Rights against our whole supply chain and every key stakeholder group. A working group comprising the Social Impact Team and third-party experts reviewed each human rights / supply chain /stakeholder interaction, with a view to the severity and likelihood of each impact.' In addition, Primark indicates in its MSA 2021: 'We conduct on-going due diligence to identify human rights risks, including modern slavery, in our supply chain. Our process aligns with the UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Supply Chains and is the result of in-depth benchmarking and consultation with human rights organisations'. However, no further information describing how the Company assesses its human rights risks covering all its operations, not only Twinings or Primark, was found. [Annual Report 2021, 2021: abf.co.uk] & [Primark MSA 2021, 03/2022: primark.a.bigcontent.io] • Not Met: Public disclosure of the results of HR assessment: In addition, the Company reports in its Twinings Ovaltine's Human Rights Position Statement 2021: 'The assessment confirmed that the salient risks facing us include: Health, safety and security at work; Forced labour; Working hours, remuneration and benefits; Community needs and living standards; Gender discrimination and harassment; Children's rights'. Similarly, Primark presents the Global risks within the garment sector in its MSA 2021. However, no further information describing how the

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Company assesses its human rights risks covering all its operations, not only Twinings or Primark, was found. Previous assessment was based on "Corporate Responsibility 2018", dated 2018, which is now out of the three-year timeframe that the methodology requires. [Primark MSA 2021, 03/2022: primark.a.bigcontent.io]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: How it involved affected stakeholders in the assessment
B.2.3	Integrating and acting on human rights risks and impact assessments	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Action Plans to mitigate risks: Some companies of the Group; such as Twinings and Primark, carried out an assessment and will implement measures to manage the different risks identified. However, no evidence found of a systematic management plan to mitigate human rights risks assessed across all Group Companies. [Twinings Human Rights position statement, 03/2021: sourcedwithcare.com] & [Primark MSA 2021, 03/2022: primark.a.bigcontent.io] • Not Met: Description of how global system applies to supply chain • Met: Example of actions decided on at least 1 salient HR issues: Twinings discloses information of its actions to response its identified human rights risks in its Human Rights Position Statement 2021: 'As part of our response to salient risks identified in our human rights gap analysis, we have adapted our internal policy and process, and enhanced due diligence in the supply chain. In 2019 we updated our Code of Conduct to explicitly ban recruitment fees. Additionally, during 2019 and 2020, we rolled out training for our global HR teams on our Code of Conduct. We also reviewed the wording of the contracts we use with employment agencies, to ensure that they clearly stipulate that workers should not pay any recruitment fees In 2019 we rolled out in-depth migrant worker assessments in supplier factories in Malaysia where there are migrant workers present. We are now working with Impact Limited (experts in workers' rights), to implement a supplier capacity-building programme in the region. Managers at five supplier sites in Malaysia have received training on the responsible management and recruitment of migrant workers. Capacity-building support will continue throughout 2020/21. Key focus areas of this work include supplier recruitment and hiring policies; the selection and management of recruitment agents; clear communication about employment terms with prospective and existing employees; and approaches to on boarding new migrant workers.' [Twinings Human Rights position statement, 03/2021: sourcedwithcare.com] & [Corporate Responsibility Report 2019, 11/2019: abf.co.uk] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involve stakeholders in decisions about actions
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: System for tracking or monitor if actions taken are effective: Primark indicates in its MSA 2021: 'Throughout our programme we monitor the coverage and effectiveness of steps we take to address forced labour by tracking the following indicators: The impacts of specific initiatives to address highlighted risks; Supplier training and awareness of forced and trafficked labour issues; Internal staff training and awareness of forced and trafficked labour issues; Audit indicators relating to forced and trafficked labour; Factory non-compliances against our Supplier Code of Conduct; Actions taken as part of collaborative initiatives to address modern slavery; Recorded grievances relating to any form of modern slavery; Advocacy efforts to raise awareness of the risks within our industry' However, no evidence found of a systematic system to monitor effectiveness of actions across all Group businesses. [Primark MSA 2021, 03/2022: primark.a.bigcontent.io] • Not Met: Lessons learnt from checking system effectiveness <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Involve stakeholders in evaluation of actions taken
B.2.5	Communicating on human rights impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Provides two examples of comms with stakeholders: The Company has provided feedback to CHRB regarding this indicator, but it was not material. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe challenges to effective comms and how it is working to address them

C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The Company states in its Speak Up Policy: 'We encourage all individuals working for ABF in any of our businesses in any country and in any capacity to Speak Up, including employees at all levels, directors, officers, part-time and fixed-term workers, casual and agency workers, seconded workers and volunteers. Where appropriate, we also encourage third parties who are associated with ABF to Speak Up, including shareholders, suppliers, agents, contractors, external consultants, third-party representatives, business partners and sponsors. All individuals working for ABF and third parties are welcome to use any of the reporting channels set out in this Policy. [...] you can contact the SpeakUp phone line or webservice.' [Speak up policy, N/A: abf.co.uk] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Channel is available in all appropriate languages and workers aware: In addition, the Company indicates: 'If you choose to use the SpeakUp webservice, you will need to provide the relevant access code [included in the Speak Up Policy] and will then be given the opportunity to write a message detailing your concern. Text on the webservice is in your local language.' However, no information describing how the Company ensures that workers are aware this service was found. [Speak up policy, N/A: abf.co.uk] • Not Met: Describe how workers in the supply chain have access to grievance mechanism: Primark's Code of Conduct indicates: 'There should be a procedure that allows workers to raise and address workplace grievances, without fear of reprisal.' However, no such provision was found in ABF Supplier Code (i.e. all ABF businesses requires suppliers to have a grievance mechanism, or provides them with access to the Company's one). On the other hand, AB Sugar has a grievance mechanism open to anyone including external stakeholders: 'For anyone that has a concern about a potential breach of our modern slavery policy, these are the options available to register their grievance or allegation and enable us to eliminate any potential practices.[...] It is not unusual for organisations to receive allegations or grievances within their supply chains from potential victims, through to NGO's, suppliers and members of our communities. It is our role to be ready, listen and act to these.' However, no such mechanism covering all group's operations was found. [Primark Supplier Code of Conduct Update 2019, 12/2019: primark.a.bigcontent.io] & [Supplier code of conduct, N/A: abf.co.uk] • Not Met: Expect Suppliers to convey expectation to their own suppliers
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Grievance mechanism for community: Although some of its subsidiaries, such as Primark (MSA 2021) or AB Sugar (We listen, we act, we remedy toolkit) report to have grievance mechanisms open to external stakeholders, no such channel covering up to the whole group's operations was found. The Company states in its Speak Up Policy: 'Where appropriate, we also encourage third parties who are associated with ABF to Speak Up, including shareholders, suppliers, agents, contractors, external consultants, third-party representatives, business partners and sponsors. All individuals working for ABF and third parties are welcome to use any of the reporting channels set out in this Policy. [...] you can contact the SpeakUp phone line or webservice.' However, it is not clear whether local communities affected by the Company's have access to this service. [Speak up policy, N/A: abf.co.uk] & [AB Sugar_We listen, we act, we remedy Toolkit, 2020: absugar.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes accessibility and local languages and stakeholder awareness • Not Met: Communities access mechanism direct or through suppliers • Not Met: Expect supplier to convey expectation to their own suppliers
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Engages users to create or assess system • Not Met: Examples (at least two) of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Engages with potential or actual users on the improvement of the mechanism • Not Met: Provides user engagement example (at least two) on improvement

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, publicly available and explained	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Response timescales and how complainants will be informed: The Company indicates in its Speak Up Policy: 'If you have reported your concern through the SpeakUp line or webservice, you will receive a unique case number. If you go back into the SpeakUp line or webservice and use this number, you will be able listen/read the acknowledgement of your report (within 7 days), any requests for more information and any update on the status of your concern'. However, no further information with respect response timescales was found. On the other hand, AB Sugar, a Company agriculture subsidiary, describes with detail its grievance process including timescales and how the complainants are informed in its document 'We listen, we act, we remedy - Grievance remediation'. However, no similar information was found in the rest of subsidiaries. The Company has provided feedback to CHRB regarding this indicator, but it was not material. [Speak up policy, N/A: abf.co.uk] & [AB Sugar _ Grievance remediation, 2020: absugar.com] • Not Met: Describe support (technical, financial,etc) available for equal access by complainants <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism • Not Met: Escalation to senior/independent level: In addition, it indicates: 'If you are unhappy with the response you receive, remember you can go to any of the other contacts detailed in this Policy. ABF is committed to ensuring any such issues are handled fairly and properly' Alternative contacts include: the Director of Financial Control, the Director of Legal Services and Company Secretary, the Chief People and Performance Officer and the Head of Legal Services – Compliance. However, no information describing how complaints or concerns for workers and all external individuals and communities may be escalated to more senior levels or independent third party adjudicators or mediators to challenge the process or outcome. On the other hand, AB Sugar, a Company agriculture subsidiary, describes the escalation process in its document 'We listen, we act, we remedy - Grievance remediation'. However, no similar information was found in the rest of subsidiaries. [Speak up policy, N/A: abf.co.uk] & [AB Sugar _ Grievance remediation, 2020: absugar.com]
C.5	Prohibition of retaliation for raising complaints or concerns	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Public statement prohibiting retaliation: The Company states in its Speak Up Policy: 'We will not tolerate the victimisation of anyone raising a genuine concern: we will ensure that you are supported and protected from adverse repercussions, retaliation or detriment.' However, it is not clear that external stakeholders, such as local communities, have access to the grievances mechanisms. The Company has provided feedback to CHRB regarding this indicator, but it was not material. [Speak up policy, N/A: abf.co.uk] • Not Met: Practical measures to prevent retaliation: It also indicates: 'It is a disciplinary offence to threaten, treat detrimentally, or retaliate against those who Speak Up in any way. [...] if you want to raise a concern confidentially, we will take all reasonable steps to keep your identity secret. We will only make your name known to those people who need to know it in order to investigate the allegation or otherwise as required by law. We do not encourage individuals to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you and it may be more difficult to establish whether any allegations are credible. If you wish to be completely anonymous, you can contact the external SpeakUp line. Anonymity is possible in countries where this is legally allowed. Sometimes this will depend on the nature of your concern'. However, it is not clear which measures are in place for those locations where anonymity is not allowed. Although it is indicated that retaliation is a disciplinary offence, no further details in relation to this were found. [Speak up policy, N/A: abf.co.uk] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company indicate it will not retaliate against workers/stakeholders • Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders
C.6	Company involvement with state-based judicial and non-judicial	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Complainants not asked to waive rights • Not Met: Company does not require confidentiality provisions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Will work with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)

Indicator Code	Indicator name	Score (out of 2)	Explanation
	grievance mechanisms		
C.7	Remediating adverse impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes how remedy has been provided • Not Met: Says how it would provide remedy for victims if no adverse impact identified: AB Sugar describes in detail its Grievance and Remedy process. It includes the 'Implementing monitoring, reporting and evaluation' step: ' This final step is critical in being able to assess the efficiency of the process, identify recurring problems that might require structure change and ensure we can report back to key our stakeholders. It is also key in ensuring that recommendations have been implemented successfully according to the plan. [...] Implementation by the relevant department is verified by the GM/MD, progress monitored, and senior management is informed on a weekly basis: If the grievance points at a problem of systematic behaviour, practice, or consequence that can be improved, the GM/ MD has the option to mandate implementation and monitoring of the improved practices. • In the case of grievances against suppliers, regular monitoring and supporting communications with the supplier will take place to ensure the remedial action has been enacted and sustained within their own systems.' However, it is unclear if this process would apply to the whole ABF business. [AB Sugar _ Grievance remediation, 2020: absugar.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Changes to systems, processes and practices to stop similar impact • Not Met: Describe approach to monitoring implementation of agreed remedy • Not Met: Approach to learning from incident to prevent future impacts
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Number grievances filed, addressed or resolved and outcome achieved: The Company indicates in its Responsibility update 2021: 'In 2021 the whistleblowing hotline received 79 notifications, most of which related to human resource issues, theft and bullying or harassment: 49% required no further action, 30% are still being investigated and 21% were resolved. Outcomes ranged from process reviews and support for individuals through to termination of contract.' However, it is not clear how many grievances were related to human rights issues. [Corporate Responsibility Report 2019, 11/2019: abf.co.uk] • Not Met: How lessons from mechanism improve management system <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Evaluation of the channel/mechanism and changes made as result: Primark, (subsidiary) reports in its MSA 2021: 'In China and the UK, we conducted a deeper dive into the effectiveness of existing operational-level grievance mechanisms, looking at how they met the UN Guiding Principles indicators on grievance mechanisms. These state that grievance mechanisms should be legitimate, accessible, predictable, equitable, transparent, rights compatible, a source of continuous learning, and dialogue-based. Our findings revealed various issues that demonstrated improvements could be made to established mechanisms in both countries, including the introduction of clearer grievance policies in multiple languages, the development of better awareness campaigns, and an increased focus on management training. The results were discussed with the relevant factories and they have also informed remediation plans, as well as deepened our understanding of what to look for when assessing the effectiveness of operational-level grievance mechanisms'. However, no evidence found of similar processes covering other Company's businesses or how would this apply to the whole business. [Primark MSA 2021, 03/2022: primark.a.bigcontent.io] • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

D. Performance: Company Human Rights Practices (25% of Total)

D.1 Agricultural Products

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.1.a	Living wage (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Pays living wage or sets target date • Not Met: Describes how living wage determined <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Achieved paying a living wage • Not Met: Definition of living wage reviewed with unions

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.1.b	Living wage (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Discloses timebound target for suppliers to pay living wage or include in code or contracts: The Supplier Code of Conduct contains standards regarding wages. 'Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income'. However, in order to be awarded, wages need to either be, living wage, or indicate that cover, at least, employees basic needs, those of his/her family or dependents, and provide some discretionary income. [Supplier code of conduct, N/A: abf.co.uk] • Not Met: Improving living wage practices of suppliers: Twinings, agriculture subsidiary from ABF, indicates in its Progress Report 2018: 'Since 2015, Twinings has been working as part of Malawi Tea 2020, a coalition of industry partners, unions, government agencies and non-governmental organisations (NGOs). Led by the Ethical Tea Partnership (ETP), the Sustainable Trade Initiative (IDH), Oxfam, the Tea Association of Malawi (TAML) and GIZ (German Development Agency), the programme aims to create a competitive Malawian tea industry in which workers receive a living wage and farmers thrive. Malawi Tea 2020's roadmap focuses on drivers such as training farmers in good agricultural practices, improving the wage-setting process through greater worker representation in unions [...] The first ever collective bargaining agreement for the Malawi tea industry, in 2016, provided a big wage increase for tea workers, followed by others in 2017 and 2018. However, inflation remains very high and erodes the purchasing power of wage increases, making closing the gap to a living wage difficult. At Twinings, we will continue ensuring we provide a fair price to producers that enable them to work toward payment of the living wage'. However, this document, dated 2018, now out of the three-year timeframe that the methodology requires. The Company has provided feedback to CHRB regarding this datapoint, but it was not material. [Primark: Creating financial resilience, N/A: corporate.primark.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by payment below living wage • Not Met: Provides analysis of trends demonstrating progress
D.1.2	Aligning purchasing decisions with human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Avoids business model pressure on HRs (purchasing practices): The Company has provided feedback to CHRB regarding this indicator, but it refers to apparel sector [Primark MSA 2021, 03/2022: primark.a.bigcontent.io] • Not Met: Practices adopted to pay suppliers in line with agreed timeframes • Not Met: Review own operations to mitigate negative impact <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Examples of how it assessed, addressed and change purchasing practices
D.1.3	Mapping and disclosing the supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields) <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of SP and why: Twinings was one of the first tea companies to publish a sourcing map. It includes names and locations of the tea producer groups and gardens the company sources from, the locations of other key ingredients and videos to show consumers what its sourcing origins look like.' In addition, AB Sugar also disclose information about its Sourcing map on its website. However, it is not clear that ABF discloses the mapping for the most significant parts of its supply chain (the Company can determine which are the most important parts of its agricultural supply chain). No further information found. [Twinings Supply Chain Map, N/A: sourcedwithcare.com] & [AB Sugar - Sourcing map, N/A: absugar.com] • Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.4.a	Prohibition of child labour: Age verification and corrective actions (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Does not use child labour: The Company indicates in its public submission to CHRB that 'In compliance with the relevant International Labour Organization (ILO) Standards, whenever any of our businesses hires a new employee we undertake age verification. If an applicant is below the legal working age, we would not employ them.' However, this assessment was based on the submission to CHRB, dated 2016, which is now out of the three-year timeframe that the methodology requires. No further evidence found during last review. • Not Met: Age verification of workers recruited: See above. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remediation if children identified [AB Sugar Modern Slavery - A Global Commitment To Human Rights 2019, 10/07/19: absugar.com]
D.1.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Child Labour rules in codes or contracts: The Company indicates in its Supplier Code: 'There shall be no recruitment of child labour. Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child. Children and young persons under 18 shall not be employed at night or in hazardous conditions. Policies and procedures shall conform to the provisions of the relevant International Labour Organization (ILO) standards. A child is defined as any person less than 15 years of age, unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age would apply. If, however, local minimum age law is set at 14 years of age in accordance with developing country exceptions under ILO Convention 138, the lower age will apply. A young person or young worker is defined as any worker over the age of a child as defined above and under the age of 18.' No provision requiring an age verification system was found. On the other hand, Twinings Supplier Code of Conduct, indicates: 'Suppliers shall maintain robust age verification checks at all times to ensure they does not recruit or exploit children in any way.' However, this provision applies only to Twinings. Previous evidence was partly based in a source dated 2016, which is out of the three-year timeframe that the methodology requires. [Supplier code of conduct, N/A: abf.co.uk] & [Twinings Supplier Code of Conduct Update 2019, 8/2019: sourcedwithcare.com] • Not Met: How working with suppliers on child labour: Twinings (subsidiary) reports about several initiatives to support Children Rights. For example, 'We have been working with CARE International since 2017 to establish Community Development Forums (CDFs) on tea estates. CDFs put the community at the heart of the solution, creating a sustainable workforce and empowering workers — especially women and young people. To date, 10 CDFs have been established across our supply chain benefiting over 39,000 people. Some of the changes led by the CDFs include life skills development and awareness-raising on issues such as gender equality, household money management and alcohol consumption. CDFs also give voice to communities about local needs — whether it's the provision of child development centres and schools or better access to government services.' However, it is not clear how the Company works specifically in eliminating child labour and improving working conditions for young workers. [Twinings Progress Report 2021, 2021: sourcedwithcare.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by child labour in supply chain • Not Met: Analysis of trends in progress made
D.1.5.a	Prohibition of forced labour: recruitment fees and costs (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Job seekers and workers do not pay recruitment fee: The Company states in its Supplier Code of Conduct: 'Our principles are as follows: [...] Employment is freely chosen. There is no forced or compulsory labour in any form, including bonded, trafficked, or prison labour. Workers are not required to lodge 'deposits' or their identity papers with their employer and are free to leave their employer after reasonable notice.' However, no provision indicating that job seekers and workers do not pay any recruitment fees or related costs to secure a job was found. [Supplier code of conduct, N/A: abf.co.uk] • Not Met: Commits to fully reimbursing if they have paid <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How practices are implemented and monitored for agencies, labour brokers or recruiters

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Debt and fees rules in codes or contracts: The Company includes the following in its Supplier Code of Conduct: 'There is no forced or compulsory labour in any form, including bonded, trafficked, or prison labour. Workers are not required to lodge 'deposits' or their identity papers with their employer and are free to leave their employer after reasonable notice'. [Supplier code of conduct, N/A: abf.co.uk] • Not Met: How working with suppliers on debt & fees <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by payment of recruitment fees • Not Met: Analysis of trends in progress made
D.1.5.c	Prohibition of forced labour: Wage practices (in own production or manufacturing operations)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Pays workers in full and on time: The Company indicates in its Annual Report 2021: 'Associated British Foods is a diversified business that currently operates in 53 countries and employs 128,000 people working across our five business segments. Our people are central to our business and we pride ourselves on being a first-class employer. As an international business we have a duty to operate responsibly and want to ensure that the people who work in our businesses are paid fairly. [...] Our businesses, each of which is responsible for setting and managing its own remuneration approach, operate in line with the principles set out below and in compliance with all local laws. [...] Employees should always receive compensation regularly, in full and on time'. [Annual Report 2021, 2021: abf.co.uk] • Not Met: Payslips show any legitimate deductions: Twinings Supplier Code of Conduct indicates that 'Workers shall receive a payslip for each pay period, in a language they understand, clearly indicating the components of the compensation, including exact amounts for wages, benefits, incentives/bonuses and any deductions. Wage calculations shall be transparent, equitable and objective, including any for remuneration based on production, quotas, or piecework.' However, this only seems to apply to Twinings Suppliers, evidence required for all the Company's agricultural operations. [Twinings Supplier Code of Conduct Update 2019, 8/2019: sourcedwithcare.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How these practices are monitored for agencies, labour brokers or recruiters
D.1.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Suppliers to pay workers in full and on time in codes or contracts: Twinings Supplier Code of Conduct indicates that 'Workers shall receive a payslip for each pay period, in a language they understand, clearly indicating the components of the compensation, including exact amounts for wages, benefits, incentives/bonuses and any deductions. Wage calculations shall be transparent, equitable and objective, including any for remuneration based on production, quotas, or piecework.' However, no further information found, including evidence for all the Company's agricultural suppliers is needed. The Company has provided feedback to CHRB regarding this datapoint, but it refers to apparel sector. [Twinings Supplier Code of Conduct Update 2019, 8/2019: sourcedwithcare.com] • Not Met: How working with supply chain to pay workers regularly and on time <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by failure to pay directly • Not Met: Provides analysis of trends demonstrating progress
D.1.5.e	Prohibition of forced labour: Restrictions on workers (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Does not retain documents or restrict movement: The Company states in its Supplier Code of Conduct: 'Our principles are as follows: [...] Employment is freely chosen. There is no forced or compulsory labour in any form, including bonded, trafficked, or prison labour. Workers are not required to lodge 'deposits' or their identity papers with their employer and are free to leave their employer after reasonable notice'. However, no evidence found of the Company itself making this commitment to own operations (or whether it applies these document/commitments to its own operations). [Supplier code of conduct, N/A: abf.co.uk] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How these practices are monitored for agencies, labour brokers or recruiters

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Free movement rules in codes or contracts: The Company includes the following in its Supplier Code of Conduct: 'There is no forced or compulsory labour in any form, including bonded, trafficked, or prison labour. Workers are not required to lodge 'deposits' or their identity papers with their employer and are free to leave their employer after reasonable notice'. The Company has provided feedback to CHRB regarding this indicator, but it refers to apparel sector. [Supplier code of conduct, N/A: abf.co.uk] • Not Met: How working with suppliers on free movement <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by retaining docs or restricting movement • Not Met: Provides analysis of trends demonstrating progress
D.1.6.a	Freedom of association and collective bargaining (in own production or manufacturing operation)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Commits not to interfere with union rights / Steps to avoid intimidation or retaliation: The Company's Supplier Code indicates: 'Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively. The employer adopts an open attitude towards the activities of trade unions and their organisational activities. Workers, representatives are not discriminated against and have access to carry out their representative functions in the workplace. Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining'. However, no evidence found of the Company itself making this commitment to own operations (or whether it applies these document/commitments to its own operations). The Company has provided feedback to CHRB regarding this datapoint, but it was not material. [Supplier code of conduct, N/A: abf.co.uk] • Not Met: Discloses % total direct operations covered by collective CB agreements <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1
D.1.6.b	Freedom of association and collective bargaining (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: FoA & CB rules in codes or contracts: The Company indicates in its suppliers' Code of Conduct that 'workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively. The employer adopts an open attitude towards the activities of trade unions and their organisational activities. Workers, representatives are not discriminated against and have access to carry out their representative functions in the workplace. Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining'. However, no evidence found on guidelines containing requirements of prohibition of harassment and retaliation against union members and representatives. Although the code refers to no harassment or inhumane treatment, commitment against harassment/retaliation needs to be in context or mention union members/representatives. [Supplier code of conduct, N/A: abf.co.uk] • Not Met: How working with suppliers on FoA and CB: The Company has provided feedback to CHRB regarding this datapoint, but it refers to apparel sector. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP • Not Met: Provides analysis of trends demonstrating progress
D.1.7.a	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own production or manufacturing operations)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes process to identify H&S risks and impacts: The Company indicates in its Health and Safety Policy: 'Our approach to ensuring safe and healthy workplaces includes the following commitments: [...] We develop and implement safety risk assessments to minimise and effectively manage hazards during plant and process changes; [...] We monitor, audit, review and report our health and safety performance to support continual improvement and to be transparent in our performance; [...] The health and safety performance of our businesses is regularly reported to, and reviewed by, the board. The responsibility for achieving compliance with this policy is devolved to the chief executive or managing director of each of our businesses. Each business has nominated a director with specific responsibility for health and safety.' [Health and safety policy, N/A: abf.co.uk]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Injury Rate or Lost days or Near miss disclosures for last reporting period: The Company indicates that in 2021, the injury rate was 0.28%. [Annual Report 2021, 2021: abf.co.uk] • Met: Fatalities for lasting reporting period: The Company reports 2 fatalities in 2021: 'Loss of life in our operations is entirely unacceptable and we are deeply saddened to report two work-related fatalities this year'. [Annual Report 2021, 2021: abf.co.uk] • Not Met: Occupational disease rate for last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Met: Set targets for H&S performance: The Company states in its Responsibility Update 2021 document: 'We work towards zero harm in the workplace, zero fatalities and continuous improvement in safety performance.' [Responsibility Update 2021, 2021: abf.co.uk] • Not Met: Met targets or explains why not or how improve management systems
D.1.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Sets out clear Health and Safety requirements: The Supplier Code of Conduct contains requirements on health and safety, including take steps to prevent accidents, receiving regular training, access to toilet facilities and clean water, establishing senior manager responsibility on health and safety within supplier operations. [Supplier code of conduct, N/A: abf.co.uk] • Not Met: Injury Rate or Lost days or Near miss disclosures for last reporting period: The Company has provided feedback to CHRB regarding this datapoint, but it refers to apparel sector • Not Met: Fatalities rate for lasting reporting period • Not Met: Occupation disease rate for last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How working with suppliers on H&S • Not Met: Assessment of the number affected by H&S issues in the SP • Not Met: Provides analysis of trends demonstrating progress
D.1.8.a	Land rights: Land acquisition (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Approach to identification of land tenure rights holders: Ilovo (subsidiary) states in its Guidelines on Land and Land Rights: 'The Ilovo Group adopts a zero tolerance approach to land grabs and requires that all its Suppliers do likewise. [...] We endeavour to ensure that impacts on the land and livelihood of local communities resulting from our activities, and those of our Suppliers, are minimised and that any unavoidable impacts are managed for the mutual benefit of all stakeholders in an effective and timely manner. 4. Mechanisms to achieve this objective include:-1. assessing the social, economic and environmental impact of our activities to ensure that our projects and other business activities are in line with, and are assessed according to, accepted international standards; 2. stakeholder engagement with local communities and public authorities on matters affecting their land ownership and land use rights; 3. implementing and providing technical and facilitating financial support to local communities, farmers and small grower schemes, in collaboration with reputable non-governmental organisations, development organisations and banks; and 4. initiating and actively participating in programmes for the redistribution of land to previously disadvantaged communities. 5. We have implemented a process to identify, and on an on-going basis we will continue to assess, through stakeholder engagement and other mechanisms, any negative impacts on land and land rights in the areas in which we operate. 6. Where appropriate, we will endeavour to mediate or otherwise attempt to assist in the resolution of disputes involving competing land rights claims between the local communities and/or between local communities and local government. 7. In relation to small grower development and other projects involving the development of local farm land, we will carry out a due diligence investigation in relation to land rights in order to identify any competing land claims, or other land rights issues, and will seek to address these insofar as possible'. However, no similar statement covering the rest of agricultural businesses of the group was found. [Ilovo Guidelines on Land and Land Rights, N/A: ilovosugarafica.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How valuation and compensation works • Not Met: Follows IFC PS 5 in any state land deals

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.8.b	Land rights: Land acquisition (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Rules on land & owners in codes or contracts: In its suppliers' Code of Conduct, the Company only refers to suppliers having to commit to free prior and informed consent for all but does not refer to the identification of legitimate tenure rights holders, with particular attention to vulnerable groups. Illovo's policy on land and land rights apply to suppliers. No evidence found, however, of the Company applying similar practices for all its relevant businesses. The Company has provided feedback to CHRB regarding this indicator. However, the source is already in use. [Supplier code of conduct, N/A: abf.co.uk] & [Illovo Guidelines on Land and Land Rights, N/A: illovosugarafrica.com] • Not Met: How working with suppliers on land issues <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Includes resettlement requirements that the supplier provides financial compensation • Not Met: Assessment of the number affected by land rights issues in its SP • Not Met: Provides analysis of trends demonstrating progress
D.1.9.a	Water and sanitation (in own production or manufacturing operations)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Action to prevent water and sanitation risks: The Company reports about its actions to prevent water and sanitation risks in its CDP Water Security document. For instance, with respect its Sugar business, it indicates: 'All of AB Sugar's facilities monitor the status of the basins in which they operate and when required, respond to changes in the stress levels. In response to water scarcity issues, many of Illovo's operations invest in projects designed to increase water efficiency. Projects to convert existing irrigation systems to drip irrigation, which is more effective and efficient in terms of water use, are underway in Malawi, Zambia and eSwatini. Our sugar operations in southern Africa constitute 99.6% of the total amount of water extracted from water stressed areas. Water conservation, use and availability have all been identified as material issues to the business. Consequently, Illovo's Sustainability Policy includes water governance criteria. Two of the key objectives of the Sustainability Policy are to reduce water consumption per unit of production within the organisation and to review wastewater management to identify opportunities for improvement. Illovo's key focus area is how to ensure "More crop per drop". As part of its water aspiration, Illovo is converting its farrow and sprinkler systems to more efficient subsurface drip irrigation and looking to produce more cane, sugar and downstream products per drop of water. The groupwide water stress assessment conducted in 2014 and repeated in 2017, 2019 and 2020 included sugar that is sourced from our outgrower suppliers as they operate in the same river basins as our own sugar estates.' [CDP Water Security 2021, 2021: abf.co.uk] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Water targets considering local factors: In addition, the Company reports: 'Our decentralised business model empowers the management of our businesses to identify and manage the risks they face to ensure compliance with relevant legislation, our business principles and group policies. Our businesses set their own environmental goals if it is an issue against which they choose to monitor their performance. [...] AB Sugar has committed to reducing its end-to-end supply chain water footprints by 30% (baseline 2018). In this reporting year, AB Sugar completed a comprehensive baseline for each of the 2030 commitments based on current data and methodologies. The water baselines have been completed by country, business, site and supply chain. The baselines have comprehensive data and include considerable details about factory, in-field and growers data but also usage, loss, evaporation and transportation data at a site level.' [CDP Water Security 2021, 2021: abf.co.uk] • Not Met: Reports progress and shows trends in progress made
D.1.9.b	Water and sanitation (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Rules on water stewardship in codes or contracts: The company indicates in its Supplier Code that 'access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided. Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers'. However, no evidence of a requirement to refrain from negatively affecting access to safe water, in the context of impact to the surrounding communities, was found. The Company has provided feedback to CHRB regarding this indicator. However, it refers to apparel sector (other piece affects to the next subindicator, which is already awarded). [Supplier code of conduct, N/A: abf.co.uk]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: How working with suppliers on water stewardship issues: The Company reports about the project SWIM in its Responsibility update 2021: 'SWIM uses a network of flow and power meters with remote sensors which feedback to a cloud-based Smart Water Management Tool. Estate managers and smallholder farmers can use the tool to detect leaks, adjust irrigation schedules and carry out water audits, all based on the real-time data it provides. Proof of concept for SWIM was completed at Illovo Sugar Malawi's Nchalo Estate in 2020. [...] A consortium of suppliers has been selected to develop the concept further by running a pilot across 742 hectares at Nchalo in 2022. This will test SWIM at scale and assess how it might dovetail with other innovations, including drip irrigation. [Responsibility Update 2021, 2021: abf.co.uk] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by lack of access to water and sanitation • Not Met: Provides analysis of trends demonstrating progress
D.1.10.a	Women's rights (in own production or manufacturing operations)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Process to stop harassment and violence against women • Not Met: Working conditions take account of gender • Met: Measures and steps to address gender pay gap at all levels of employment: The Company indicates in its Annual Report 2021: 'We remain committed to increasing the diversity and inclusion within our workforce at all levels and will do this in a way that is right for our decentralised structure. Given our decentralised business model, many policies that foster diversity in the workforce are developed and delivered locally. We also operate initiatives across Associated British Foods to promote diversity and these include: •many of our managerial and professional women are invited to join 'Women in ABF', which meets three times a year providing a chance for networking, learning and support for personal career development. The group currently has over 900 members; [...] In the main, the pay gap remains similar to prior years. The overall Group pay gap is in favour of men as we have a significant number of female employees who work as retail assistants. 75% of roles in the lower quartile of the pay data are taken by women. Men on the other hand take up more of the highest-paid roles. [...] This is a Group with very long average tenure, which means that the gender balance at the top of the Group changes slowly.[...] When opportunities do emerge for succession, we appoint the best person for the role, and when appropriate, bring in expertise from the outside to complement internal experience and knowledge.[...] Examples from across the Group: [...] AB World Foods' leadership team has an equal gender balance and 144 line managers have completed unconscious bias workshops; •Westmill Foods is offering 20 employees career coaching with senior leaders – with 75% of those being coached from under-represented groups. The business has also reduced its gender pay gap from 4.9% to 0.4% for 2021;' [Annual Report 2021, 2021: abf.co.uk] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Provides analysis of trends demonstrating closing gender pay gap
D.1.10.b	Women's rights (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Women's rights in codes or contracts

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: How working with suppliers on women's rights: Twining reports on its website: 'Women form the majority of the workforce in tea gardens and smallholder farms, but are often at risk of discrimination, harassment and sometimes even violence. A key priority for us is to ensure that women in our supply chain live and work in a safe, positive and empowering environment where they can thrive. Our Sourced with Care programme is working in Assam and Darjeeling to provide a safer environment for women and girls, by empowering them, building management capacity to address these issues and promoting more gender-equitable attitudes and relationships. In addition, we are working to train tea estate management and build the capacity of worker committees in Assam and Darjeeling. As part of the training, we aim to empower workers to help prevent and respond to sexual harassment and gender-based violence, as well as to promote more gender-equitable attitudes and relationships in the community. We are also developing an online training module which will be rolled out across our supply chain. While we aim to prevent gender-based violence, we also need to have the right approach in place to enable us to identify when a breach occurs. These issues are very difficult to uncover because victims can sometimes be too embarrassed to speak up or fear repercussions. In 2021, we piloted an add-on to our TCNA to find new ways to help us better identify gender-based violence or harassment incidents in our supply chain, for example through role play.' [Twining: Protecting women and girls, N/A: sourcedwithcare.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by discrimination or unsafe working conditions • Not Met: Provides analysis of trends demonstrating progress

D.2 Apparel

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.1.b	Living wage (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Discloses living wage requirements in supplier code or contracts: The Company (Primark) has requirements regarding wages in its Supplier Code of Conduct: 'Wages and benefits paid for a standard working week must meet, as a minimum, the national minimum wage, or in the absence thereof an acceptable industry benchmark. In any event, wages must always be enough to meet basic needs and to provide some discretionary income'. However, in order to be sufficient to CHRB methodology, wages need to cover employee and his/her family/dependents basic needs (in addition to some discretionary income). No evidence found. [Primark Supplier Code of Conduct Update 2019, 12/2019: primark.a.bigcontent.io] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Improving living wage practices of suppliers: Primark reports that 'As part of our goal to create financial resilience for the workers in our supply chain, we will work to pursue a Living Wage for everyone who makes our clothes. [...] We are determined to use the scale of our business to drive meaningful, measurable progress both through our own changes and working together with others. [...] We believe the best path to agreeing both of these things is through constructive dialogue negotiated between workers and their employer, which is what we are working to achieve through ACT. ACT is an agreement between 20 global brands and the IndustriALL Global Union in pursuit of living wages for workers in textile and garment supply chains of which Primark is a founding member. We recognise that the negotiated route isn't an option for workers in every country, which is why we will use the Living Wage approach developed by the Global Living Wage Coalition, widely recognised internationally as a credible benchmark.[...] We know how important it is to partner with our suppliers on pursuing the payment of a living wage, particularly as the people who make Primark products don't work directly for us. We want to be clear and honest with our suppliers about our ambition and the fact that over time we will change the way in which we select, work and partner with them, increasingly preferring those suppliers who share our Living Wage aspirations, and those who are also active in ACT alongside us – where possible. Our aim is to build stronger, more strategic partnerships where we support our suppliers, with better forecasting and planning on our side helping them make more efficiencies in their production, to be able to increase wages paid to workers'. [Primark: Creating financial resilience, N/A: corporate.primark.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by payment below living wage • Not Met: Provides analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.2	Aligning purchasing decisions with human rights	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Avoids business model pressure on HRs (purchasing practices): Primark (subsidiary) indicates that 'The ACT Commitments: – Wages as itemised costs. – Fair payment terms. We are signatories to the UK Government Prompt Payment Code and our payment terms are set at 30 days. – Better planning and forecasting. We are committed to increasing our focus on forecasting and planning to provide suppliers with greater certainty on volume commitments so they can plan with confidence. This will play an important role in underpinning our transition to a Living Wage. – Training on responsible sourcing and buying. – Responsible exit strategies. We implement the ACT Responsible Exit Policy developed in 2019/20. Our Sourcing team conducts dependency reviews with suppliers and factories to indicate relative dependencies and risks on both sides, giving our supply chain partners an opportunity to mitigate any impacts where required'. [Primark MSA 2021, 03/2022: primark.a.bigcontent.io] • Met: Practices adopted to pay suppliers in line with agreed timeframes: Primark (subsidiary) indicates in its MSA 2021: ' We are signatories to the UK Government Prompt Payment Code and our payment terms are set at 30 days'. [Primark MSA 2021, 03/2022: primark.a.bigcontent.io] • Not Met: Review own operations to mitigate negative impact <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Examples of how it assessed, addressed and change purchasing practices
D.2.3	Mapping and disclosing the supply chain	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): The Company has disclosed the supplier map of Primark, indicating: 'The factories featured on the map are Primark's suppliers' production sites which represent over 95% of Primark products for sale in our stores.' [Primark Global Sourcing Map, N/A: globalsourcingmap.primark.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Discloses names and locations of significant parts of SP and why: The Company has disclosed the supplier map of Primark, indicating: 'The factories featured on the map are Primark's suppliers' production sites which represent over 95% of Primark products for sale in our stores.' [Primark Global Sourcing Map, N/A: globalsourcingmap.primark.com] • Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities
D.2.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Child Labour rules in codes or contracts: Primark's Supplier Code of Conduct states that 'There must be no recruitment or employment of child labour.' 'Companies must have policies and programmes which prevent the recruitment and employment of child labour.' No evidence found, however of guidelines in relation to age verification of job applicants and workers and remediation programmes in place in case child labour is found. [Primark Supplier Code of Conduct Update 2019, 12/2019: primark.a.bigcontent.io] • Met: How working with suppliers on child labour: Primark (subsidiary) reports in its MSA 2021: 'Through our on-going partnership with The Centre (formally the Center for Child Rights and Corporate Social Responsibility (CCR CSR)) we initiated and developed an extensive training curriculum for young workers in the supply chain. The curriculum was co-created with input and engagement from our global team to make sure it was appropriate to the local context and it comprises six modules: child rights and workers' rights, health and safety, rights to education and financial literacy. And it is available in five languages. The Centre ran five training sessions to train our global team on how to deliver this training to young workers'. [Primark MSA 2021, 03/2022: primark.a.bigcontent.io] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by child labour in supply chain • Not Met: Analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Debt and fees rules in codes or contracts: Primark's Supplier Code of Conduct states that 'There must be no forced or compulsory labour in any form, including bonded, indentured, trafficked, or prison labour and overtime must be voluntary. Any fees associated with the employment of Workers must be paid by the Employer. Workers must not be required to lodge any monetary deposits or their identity papers with their Employer'. [Primark Supplier Code of Conduct Update 2019, 12/2019: primark.a.bigcontent.io] • Met: How working with suppliers on debt & fees: Primark's MSA 2021 reports: 'My Journey' is a training and awareness programme focused on modern slavery and forced labour in South India aimed at factory management. The region is a hub for spinning and fabric mills and many workers migrate there from different regions across India. Workers in this region, both local and domestic migrants, have been identified as vulnerable and at risk of forced labour. Recruitment and hiring practices are a key source of these risks. The My Journey programme aimed at building the understanding and capacity of middle management in factories to manage this risk and has been running since 2019. The programme training curriculum is based on three 'golden rules' of hiring and recruitment: (i) workers should not pay any fees, (ii) workers must be given accurate information and (iii) factories must be comfortable that all workers have been recruited of their own free will and not under duress'. [Primark MSA 2021, 03/2022: primark.a.bigcontent.io] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by payment of recruitment fees • Not Met: Analysis of trends in progress made
D.2.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Requirement for suppliers to pay workers in full and on time in codes or contracts: Primark's Supplier Code indicates: 'All Workers must be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid. Deductions from wages as a disciplinary measure or any deductions from wages not provided for by national law are not permitted without the express permission of the Worker. All disciplinary measures must be recorded.' However, no provision requiring suppliers to pay workers in full and on time was found. The Company referred to a document in which no material evidence was found. It also provided the ACT global purchasing practices commitments document. However, it is not clear if these requirements, including paying in full and on time are part of the suppliers' requirements. [Primark Supplier Code of Conduct Update 2019, 12/2019: primark.a.bigcontent.io] • Not Met: How working with supply chain to pay workers regularly and on time <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by failure to pay directly • Not Met: Provides analysis of trends demonstrating progress
D.2.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Free movement rules in codes or contracts: Primark's Supplier Code of Conduct states that 'There must be no forced or compulsory labour in any form, including bonded, indentured, trafficked, or prison labour and overtime must be voluntary. Any fees associated with the employment of Workers must be paid by the Employer. Workers must not be required to lodge any monetary deposits or their identity papers with their Employer'. [Primark Supplier Code of Conduct Update 2019, 12/2019: primark.a.bigcontent.io]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: How working with suppliers on free movement: Primark's MSA 2021 reports: 'My Journey' is a training and awareness programme focused on modern slavery and forced labour in South India aimed at factory management. The region is a hub for spinning and fabric mills and many workers migrate there from different regions across India. Workers in this region, both local and domestic migrants, have been identified as vulnerable and at risk of forced labour. Recruitment and hiring practices are a key source of these risks. The My Journey programme aimed at building the understanding and capacity of middle management in factories to manage this risk and has been running since 2019. The programme training curriculum is based on three 'golden rules' of hiring and recruitment: (i) workers should not pay any fees, (ii) workers must be given accurate information and (iii) factories must be comfortable that all workers have been recruited of their own free will and not under duress.' However, it is not clear whether freedom of movement-related issues are included in the training program [Primark MSA 2021, 03/2022: primark.a.bigcontent.io] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by retaining docs or restricting movement • Not Met: Provides analysis of trends demonstrating progress
D.2.6.b	Freedom of association and collective bargaining (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: FoA & CB rules in codes or contracts: The Company (Primark) indicates in its suppliers' Code of Conduct that 'All workers have the right to join or form trade unions of their own choosing and to bargain collectively. Employers will adopt an open attitude towards the activities of trade unions and their organisational activities. Workers' representatives must not be discriminated against and must have access to carry out their representative functions in the workplace. Where the right to freedom of association and collective bargaining is restricted under law, Employers will facilitate, and must not hinder, the development of parallel means for independent and free association and collective bargaining'. [Primark Supplier Code of Conduct Update 2019, 12/2019: primark.a.bigcontent.io] • Met: How working with suppliers on FoA and CB: Primark report in its MSA 2021: 'The Myanmar Guideline on Freedom of Association (2019) covers the right to freedom of association and how it is applied within the workplace, including the process for constructive social dialogue, release and facilities for trade union activities, dismissal procedure, collective bargaining mechanism and negotiation process, principles on strikes, lock-out and picketing, overall standards of conduct, and dispute resolution. Training for suppliers on the guideline was provided by ACT in 2020.' [Primark MSA 2021, 03/2022: primark.a.bigcontent.io] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP • Not Met: Provides analysis of trends demonstrating progress
D.2.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Sets out clear Health and Safety requirements: The Supplier Code of Conduct contains requirements on health and safety, including take steps to prevent accidents, receiving regular training, access to toilet facilities and clean water, establishing senior manager responsibility on health and safety within supplier operations. [Primark Supplier Code of Conduct Update 2019, 12/2019: primark.a.bigcontent.io] • Not Met: Injury Rate or Lost days or Near miss disclosures for last reporting period • Not Met: Fatalities for last reporting period • Not Met: Occupation disease rate for last reporting period

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: How working with suppliers on H&S: Primark reports that 'My Space aims to support the mental health of workers in selected factories in South India by building and providing counselling services in factories and building capacity through training factory-based counsellors. As well as outcomes related to mental health, workers and managers report that the programme has successfully helped to build trust and communication in the workplace. These are fundamental to some of the building blocks of decent work such as social dialogue and use of workplace grievance mechanisms. During the pandemic, training was provided virtually to ensure the programme was able to continue. A new module was introduced in 2021 for factory managers to help build their understanding of how stress can impact on the workplace and workers. [...] The Worker Learning Club project aimed to educate workers on OHS (Occupational Health and Safety), core labour rights and life skills. The clubs were led by Worker Champions who attended a two-day training on awareness and knowledge of OHS as well as skills to operate and manage the clubs effectively. Worker Champions disseminated learning materials through online platforms (WeChat) to facilitate peer learning. Gender equality considerations were incorporated including discrimination, sexual harassment, women's labour rights protection, especially on OHS and job restrictions for female workers. One factory ran a Safety Month campaign which collected 19 workplace safety improvement suggestions from the workers and a Safety Awareness Quiz which attracted a high level of participation by the workers. The second factory demonstrated a high rate of participation from female workers – among nine worker champions, seven were women, and female workers constituted 60% of the total club members, reaching the programme goal of "at least 50% female participation". [Primark MSA 2021, 03/2022: primark.a.bigcontent.io] • Not Met: Assessment of the number affected by H&S issues in the SP • Not Met: Provides analysis of trends demonstrating progress
D.2.8.b	Women's rights (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Women's rights in codes or contracts • Met: How working with suppliers on women's rights: The Company indicates that 'Primark want to stop all gender-based violence and harassment (GBVH) in their suppliers' factories and grievance mechanisms are key to doing this. A key challenge is building trust and ensuring no retaliation. Primark are continuing to develop programmes to support more gender-friendly workplaces, by building a network of partners and focusing on the use of workplace committees as one way to report, investigate, and deal with GBVH. In India: Together with their longstanding partner St. John's Medical College, Primark have adapted an existing training programme, My Space, to train selected staff in 13 factories on GBVH and encourage their participation in their factory's internal complaints committee. In Cambodia and Vietnam: Primark's partner, NGO Care International has provided training and awareness activities on GBVH in 7 factories and helped management to establish and run sexual harassment prevention committees. In Bangladesh: Together with the Ethical Trading Initiative, Primark have helped 6 factories to set up and manage sexual harassment committees and train their members on GBVH.' [Responsibility Update 2021, 2021: abf.co.uk] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by discrimination or unsafe working conditions • Not Met: Provides analysis of trends demonstrating progress
D.2.9.b	Working hours (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Working hours in codes or contracts: Both ABF and its subsidiary, Primark (through which all apparel activities are undertaken), do have suppliers' code of conduct which includes not working beyond excessive hours and state that 'workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every seven-day period on average. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate'. [Primark Supplier Code of Conduct Update 2019, 12/2019: primark.a.bigcontent.io] & [Supplier code of conduct, N/A: abf.co.uk] • Not Met: How working with suppliers on working hours: The Company has provided feedback to CHRB regarding this datapoint, but it was not material <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by excessive working hours • Not Met: Provide analysis of trends in progress made

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Area: FoA/CB • Headline: COVID-19. Primark suppliers accused of using the COVID-19 crisis to dismiss union members • Story: On June 24, 2020, media outlets reported that three factories, supplying Inditex and Primark, an Associated British Foods subsidiary, are facing accusation, from unions, for using the COVID-19 pandemic as a pretext to dismiss unionised workers. According to the article, Inditex sources from all three factories, Myan Mode, Rui-Ning and Huabo Times, while Primark sources from Myan Mode and Huabo Times. Unions report that, 571 workers – including all 520 members of the factory union – were dismissed from Myan Mode garment factory. While the factory has cited a decrease in orders due to COVID-19 as reason for the dismissals, they were made hours after union representatives requested increased protections against the risk of COVID-19 infection. Myan Mode has since dismissed a further 50 workers who walked out of the factory to protest against the dismissal of the union members. The factory reached an agreement with the union to reinstate 25 fired unionised workers and recall hundreds of other fired union members when operations return to normal. In May 2020, Rui Ning factory laid off 324 workers, including 298 union members, citing COVID-19 related reasons for the dismissals. Union leaders have claimed that the dismissals were due to the union affiliation, and report having since observed the factory hiring new workers who are not unionised. In May 2020, Huabo Times factory laid off 107 workers, including 26 union members, due to the impact of COVID-19; however, a few weeks later the company allegedly transferred workers from another factory into Huabo Times. [The Guardian, 24/06/2020, "Zara and Primark factory workers say they were fired after forming union": theguardian.com] [Business and Human Rights Resource Centre, 22/06/2020, "Myanmar: Garment workers allege factories are using COVID-19 to dismiss union members": business-humanrights.org]
E(1).1	The company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Public response: In response to the allegation, the company stated: "We were aware of this allegation and an investigation is already underway. We are in contact with both the union and the supplier (Huabo Times), who has entered into dialogue with the union and the Ministry of Labour, to determine further details". And continued saying: "Once our investigation has concluded, if a breach has been identified we will work with the supplier on remediation". [Business and Human Rights Resource Centre, 22/06/2020: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: The company responded in very general terms and did not address the allegation in detail.
E(1).2	The company has investigated and taken appropriate action	0.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Engaged with stakeholders: In response to the allegation, the company stated: "We were aware of this allegation and an investigation is already underway. We are in contact with [...] the union". This indicates that the company engaged with the union as legitimate representative of the affected workers. [The Guardian, 24/06/2020: theguardian.com] • Not Met: Identified cause: The company stated that: "Once our investigation has concluded, if a breach has been identified we will work with the supplier on remediation". However, the company does not present investigative results on the underlying causes of the events concerned. [The Guardian, 24/06/2020: theguardian.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: The company stated that: "Once our investigation has concluded, if a breach has been identified we will work with the supplier on remediation". However, as the company does not present results of the investigation, there is no evidence that the company made changes to its management systems following the events and their human rights impacts. • Not Met: Stakeholder input to steps taken
E(1).3	The company has engaged with affected stakeholders to	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Provided remedy: The company stated that: "Once our investigation has concluded, if a breach has been identified we will work with the supplier on

Indicator Code	Indicator name	Score (out of 2)	Explanation
	provide for or cooperate in remedy(ies)		remediation". However, there is no evidence suggesting the company provided remedy to the affected stakeholders. [The Guardian, 24/06/2020: theguardian.com] <ul style="list-style-type: none"> • Not Met: Evidence for lack of Impact or link Score 2 <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders: The company stated that: "Once our investigation has concluded, if a breach has been identified we will work with the supplier on remediation". However, there is no evidence suggesting the company provided remedy to the affected stakeholders. [The Guardian, 24/06/2020: theguardian.com] • Not Met: Remedy delivered • Not Met: Independent remedy process used

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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