

**Corporate Human Rights Benchmark
2023 Company Scorecard**

Company name	Associated British Foods
Sector	Food and agricultural products (supply chain and own operations) & Apparel (supply chain only)
Overall score	21.4 out of 100

Theme score	Out of	For theme
1.3	10	A. Governance and Policy Commitments
4.4	25	B. Embedding Respect and Human Rights Due Diligence
6.5	20	C. Remedies and Grievance Mechanisms
5.6	25	D. Performance: Company Human Rights Practices
3.8	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 Policy Commitments (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:</p> <p>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 Primark Supply Chain Human Rights Policy: '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): As indicated above, Primark Supply Chain Human Rights Policy indicates: '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'. However, it is not clear whether all group companies are covered by similar human rights policy commitments. No Group-wide formal statement of commitment was found that meets the CHRB document and wording criteria. [Primark Supply Chain Human Rights Policy, 2023: primark.a.bigcontent.io] • Not Met: International Bill of Human Rights <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to 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 Primark Supply Chain Human Rights Policy: '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, 2023: primark.a.bigcontent.io] • Not Met: Commitment to OECD MNE Guidelines: As above
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental	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: Commitment to ILO core principles: The 2022 Modern Slavery Statement, states that 'Our comprehensive Group Supplier Code of Conduct sets out the values and standards we expect. It is based on the Ethical Trading Initiative (ETI) Base Code, and the ILO Declaration on Fundamental Principles and Rights at Work (1998, amended 2022) which cover: freedom of association and collective bargaining; forced labour; child labour; discrimination'. However, this document is

Indicator Code	Indicator name	Score (out of 2)	Explanation
	Principles and Rights at Work		<p>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 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. [ABF 2022 Modern Slavery Statement, 11/2022: abf.co.uk] & [Primark Supply Chain Human Rights Policy, 2023: primark.a.bigcontent.io]</p> <ul style="list-style-type: none"> • Not Met: Explicitly lists all four ILO core principles: See above. <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expects suppliers to commit to ILO core principles: The Company commits to each ILO core in its Supplier Codes of Conduct (See below). [ABF Supplier code of conduct, N/A: abf.co.uk] & [Primark Supplier Code of Conduct Update 2019, 12/2019: primark.a.bigcontent.io] • Met: Explicitly lists all four ILO core principles for suppliers: The Company commits to each ILO core in its ABF Supplier Code of Conduct and Primark 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 ABF Supplier Code of Conduct states that 'Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively'. Primark Supplier Code of Conduct notes: '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'. [ABF Supplier code of conduct, N/A: abf.co.uk] & [Primark Supplier Code of Conduct Update 2019, 12/2019: primark.a.bigcontent.io]
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:</p> <p>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. [ABF Health and safety policy, N/A: abf.co.uk] • Not Met: Commitment to ILO working hours standards or 48 hour regular work week <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expects suppliers to commit to H&S of workers: The supplier codes contain requirements regarding health and safety. [ABF Supplier code of conduct, N/A: abf.co.uk] & [Primark Supply Chain Human Rights Policy, 2023: primark.a.bigcontent.io] • Met: Expects suppliers to commit to ILO working hours standards or 48 hour regular work week: The Company indicates in its ABF 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'. The Primark Supplier Code of Conduct states: 'Standard working hours, excluding overtime, must be defined by contract and must not exceed 48 hours per week. Overtime must be used responsibly, taking into account the extent, frequency and hours worked by individual workers and the workforce as a whole. Total hours worked including overtime, must not exceed 60 hours in any 7 day period unless there are exceptional circumstances. [...] overtime must be voluntary. [...] Overtime hours must always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay'. [ABF Supplier code of conduct, N/A: abf.co.uk] & [Primark Supply Chain Human Rights Policy, 2023: primark.a.bigcontent.io]
A.1.3.a.AG	Commitment to respect human rights particularly relevant to the sector – land, natural	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: Commitment to respect land ownership/natural resources as in VGGT • Not Met: Commitment to respect land ownership/natural resources as in IFC Performance Standards • Not Met: Commitment to respect indigenous rights or ILO No.169 or UN Declaration • Not Met: Expects suppliers to make these commitments

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	resources and indigenous peoples' rights (AG)		<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to respect 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. [ABF Environmental Policy, N/A: abf.co.uk] • Not Met: Commitment to obtain FPIC or zero tolerance to land grabbing • Not Met: Expects suppliers to make these commitments: 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. [ABF Supplier code of conduct, N/A: abf.co.uk]
A.1.3.b.AG	Commitment to respect human rights particularly relevant to the sector – 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: Commitment to 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: Commitment to children's rights: See above [Twining Human Rights Policy, 06/2020: sourcedwithcare.com] • Not Met: Commitment to 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 Ilovo Sugar: 'Ilovo 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 Ilovo 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. [ABF Supplier code of conduct, N/A: abf.co.uk] & [Ilovo Sugar Code of Conduct, N/A: ilovosugarafrika.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment refers to 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] • Not Met: Commitment refers to 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. [Twining Human Rights Policy, 06/2020: sourcedwithcare.com] • Not Met: Commitment refers to 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. [Twining Human Rights Policy, 06/2020: sourcedwithcare.com] • Not Met: Expects suppliers to respect these rights

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A.1.3.AP	Commitment to respect human rights particularly relevant to the sector – 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: Commitment to 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. No further details found during last revision. [Primark 2021 Modern Slavery Statement, 03/2022: primark.a.bigcontent.io] • Not Met: Commitment to children's rights • Not Met: Commitment to 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. No further details found during last revision. [ABF Supplier code of conduct, N/A: abf.co.uk] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment refers to CEDAW/Women's Empowerment Principles • Not Met: Commitment refers to Child Rights Convention/Business Principles • Not Met: Commitment refers to Convention on migrant workers • Not Met: Expects 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: Commitment to remedy adverse HRs impacts: 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 the provision of remedy for workers in our supply chain 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 responsibility for delivering this remedy predominantly 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, 2023: primark.a.bigcontent.io] • Not Met: Expects suppliers to make this commitment: The ABF Supplier Code of Conduct indicates: 'ABF reserves the rights to verify the supplier's and representative's compliance with the Code. Where supplier and representative reviews or audits demonstrate shortcomings in any of these areas, the supplier and representative should strive to implement a time-bound programme of improvement (remediation) leading to conformance'. However, it is not clear the expectation of remediation of adverse impacts goes beyond the context of audits findings. [ABF Supplier code of conduct, N/A: abf.co.uk] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to collaborate with judicial or non-judicial mechanisms • Not Met: Commitment to work with suppliers on remedy: See above
A.1.5	Commitment to respect the rights of human rights defenders	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: Zero tolerance of threats/attacks on HRDs: In the Twinings Human Rights Policy, 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.' Moreover, Primark has signed a statement supporting civic freedoms, Human Rights defenders

Indicator Code	Indicator name	Score (out of 2)	Explanation
			and the rule of law. However, no policy stating the commitment on behalf the whole group was found. [Twining Human Rights Policy, 06/2020: sourcedwithcare.com] & [Primark Statement Civic Freedoms, N/A: primark.a.bigcontent.io] <ul style="list-style-type: none"> • Not Met: Expects suppliers to make this commitment Score 2 <ul style="list-style-type: none"> • Not Met: Commitment to working with HRDs to create safe and enabling environment

A.2 Board Level Accountability (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: The 2022 ABF Annual Report indicates: 'responsibility and accountability for risk management, including human rights, sits with the chief executives of each ABF business; the Group Board provides periodic oversight and support to them'. However, it is not clear a Board member or Board committee is tasked with specific governance oversight of respect for human rights. No further evidence found. [ABF 2022 Annual Report, 09/2022: abf.co.uk] • Not Met: Describes HRs expertise of Board member Score 2 <ul style="list-style-type: none"> • Met: Board member/CEO signal importance of HRs in their communications: 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: Process to review HRs strategy at board level: 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: Example of HRs issues/trends discussed in 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. No further details found during last revision. [ABF 2022 Annual Report, 09/2022: abf.co.uk] Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Describes how affected stakeholders / HRs experts inform board 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: At least one board member incentive linked to HRs commitments: Part of executive directors' remuneration includes ESG and strategic performance. However, this indicator focuses on incentive or performance management scheme linked to the company's human rights policy commitment for Board members. No further evidence found. [ABF 2022 Annual Report, 09/2022: abf.co.uk] • Not Met: Incentive scheme linked to key HRs risks beyond employee H&S Score 2 <ul style="list-style-type: none"> • Not Met: Performance criteria linked to HRs made public

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Review of other board incentives for coherence with HRs policies
A.2.4	Business model strategy and risks	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: Board process to review business model and strategy for HRs risks • Not Met: Describes frequency and triggers for reviewing business model <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Example of actions resulting from reviews

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	<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 • Met: Senior responsibility for HRs 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] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes day-to-day responsibility for implementing HRs commitments • Not Met: Day-to-day resources and expertise allocation in own operations • Not Met: Resources and expertise allocation in supply chain: The webpage section Primark Social indicates: 'Our Ethical Trade and Environmental Sustainability Team is responsible for implementing our Code of Conduct as well as additional programmes and policies. These include Primark's compliance with the UK Modern Slavery Act; implementing our structural safety programme; and working in collaboration with global and local experts as well as other brands and retailers on programmes designed to drive improvements across the textile industry'. However, no further information regarding other divisions (i.e. evidence that shows how all the Company groups allocate resources to the supply chain). [Primark Social_web, N/A: corporate.primark.com]
B.1.2	Incentives and performance management	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: Senior manager incentives linked to HRs commitments: Part of executive directors' remuneration includes ESG and strategic performance. However, it is not clear it is linked to the Company's Human Rights performance. No further evidence found. • Not Met: Incentive scheme linked to key HRs risks beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria linked to HRs made public • Not Met: Review of other senior management incentives for coherence with HRs policies
B.1.3	Integration with enterprise risk management	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: HRs risks 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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. [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: Risk assesment by Audit Committee or independent third party
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 • Not Met: Communicates HRs policies to all workers in own operations: The Company indicates in its 2021 Modern Slavery Statement: '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 2021 Annual Report: '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. The 2022 Sustainability Report discloses examples of specific training programmes, on inclusion, for instance. However, it is not clear how it communicates its Human Rights policy commitments to all its workers, including in 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: Communicates HRs policies to stakeholders • Not Met: Example of how HRs policies are accessible for intended audience

Indicator Code	Indicator name	Score (out of 2)	Explanation
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 • Met: Requires suppliers to communicate HRs policies: 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 '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'. [ABF Supplier code of conduct, N/A: abf.co.uk] & [Modern Slavery Statement 2021, 2021: media.business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes how HRs policies are contractual/binding for suppliers: 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: Requires suppliers to cascade contractual/binding HRs policies to its 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. No further details found during last revision. [ABF 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: Score of at least 1 on A.1.2.a • Met: Describes how workers are trained on HRs 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 on HRs: 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Meets both requirements under score 1 • Met: Trains suppliers to meet HRs commitments: 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 principles and standards that they are required to meet'. [Sugar_We listen, we act, we remedy Toolkit AB, 2020: absugar.com] & [Primark 2021 Modern Slavery Statement, 03/2022: primark.a.bigcontent.io] • Not Met: Discloses % suppliers 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: Score of at least 1 on A.1.2.a • Not Met: Monitors implementation of HRs policy commitments across global ops and supply chain: According its Responsibility Update 2021: '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'. The 2022 Annual Report remarks: 'our UK Grocery businesses monitor their supply chains and engage suppliers by using the online database provided by Sedex. Over the past 12 months our UK Grocery businesses have been working with a central specialist data management team within the division to embed new procedures to monitor supplier engagement with Sedex and provide accurate data to their management teams'. The 2022 Responsibility Report adds: 'Another example is Primark's Ethical Trade auditing and monitoring programme, which conducted over 2,400 audits during 2021, most of which were unannounced'. However, no information describing how it monitors its own operations was found. [Responsibility Update 2021, 2021: abf.co.uk] & [ABF Supplier code of conduct, N/A: abf.co.uk] • Not Met: Discloses % of supply chain monitored • Not Met: Describes 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 2021 Modern Slavery Statement, 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 • Not Met: Describes corrective actions process: The webpage section Primark Driving Continuous Improvement adds: 'Following any audit, our team gives the factory a Corrective Action Plan. This plan details any non-compliance issues with our Code of Conduct and lays out a mutually agreed, time-specific action plan to resolve the issues identified. This plan is signed off by the factory at the end of the audit. However, no further information describing the corrective action process regarding other divisions covering 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. [Primark Driving Continuous Improvement_web, N/A: corporate.primark.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Discloses findings and number of correction action processes
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: HRs performance affects selection 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 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. No further details found during last revision. <p>[Primark: Inquiry into Xinjiang Detention Camps, 11/2020: committees.parliament.uk]</p> <ul style="list-style-type: none"> • Met: HRs performance affects continuation 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'. [ABF Supplier code of conduct, N/A: abf.co.uk] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes positive HRs incentives for business relationships • Met: Works with suppliers to meet HRs 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: Describes how workers and communities identified and engaged in the last two years: The Company indicates in its Annual Report 2022: '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, communities, 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. [ABF 2022 Annual Report, 09/2022: abf.co.uk] • Not Met: Discloses stakeholders whose 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,

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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 2021 Modern Slavery Statement, 03/2022: primark.a.bigcontent.io] & [Twinings Progress Report 2021, 2021: sourcedwithcare.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HRs issues • Not Met: Describes how stakeholders views influenced company's HRs 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: Describes process of 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: Describes process for identifying risks in 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 2021 Modern Slavery Statement, 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: Describes global risk identification system incl. stakeholder consultation: 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 2021 Modern Slavery Statement 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.' The 2022 Sustainability Report adds: 'Our businesses have used different approaches, including mapping tools, to identify salient human rights risks in their supply chains. One example of these tools is Risk Methods; this platform will flag an alert if a supplier is linked to any adverse media reports of issues relating to labour practices and human rights issues. The tool monitors a range of data sources to determine when a number of different risk factors require an alert to be issued. Where risks are more intractable, systemic or endemic to a specific location or supply chain, our businesses will develop more enhanced risk analysis approaches involving stakeholders, and our own local teams. Examples of this include Primark's approach to the risks associated with its supply chains in China and Myanmar'. However, no further information found, including whether there are processes covering all Company's activities that are ongoing, and consulting with experts and affected stakeholders. [Primark 2021 Modern Slavery Statement, 03/2022: primark.a.bigcontent.io] & [ABF 2022 Annual Report, 09/2022: abf.co.uk] • Met: Describes how risk identification system is triggered by new circumstances: The 2022 Sustainability Report indicates: 'Where risks are more intractable, systemic or endemic to a specific location or supply chain, our businesses will develop more enhanced risk analysis approaches involving stakeholders, and our own local teams. Examples of this include Primark's approach to the risks associated with its supply chains in China and Myanmar. Primark collaborated with a number of other brands sourcing from Myanmar and the ETI, which commissioned a human rights impact assessment focusing on the prospect for responsible business conduct in Myanmar. The findings of this assessment were combined with information from the Primark Ethical Trade team and reviewed by the Primark Myanmar Steering Committee to guide further actions Consequently Primark concluded it would work towards a responsible exit from Myanmar'. [ABF 2022 Annual Report, 09/2022: abf.co.uk] • Not Met: Describes risks identified in relation to new circumstances
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: Describes assessment process and discloses salient HRs risks: 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). No further details found during last revision. [Annual Report 2021, 2021: abf.co.uk] • Not Met: Describes 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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 2021 Modern Slavery Statement: '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. No further details found during last revision. [Annual Report 2021, 2021: abf.co.uk] & [Primark 2021 Modern Slavery Statement, 03/2022: primark.a.bigcontent.io]</p> <ul style="list-style-type: none"> • Not Met: Public disclosure of results of HRs risk 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 Company assesses its human rights risks covering all its operations, not only Twinings or Primark, was found. No further details found during last revision. [Primark 2021 Modern Slavery Statement, 03/2022: primark.a.bigcontent.io] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Describes how assessment involved affected stakeholders
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: Describes system to prevent, mitigate and remediate HRs issues: Some companies of the Group; such as 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. No further details found during last revision. [Primark 2021 Modern Slavery Statement, 03/2022: primark.a.bigcontent.io] • Not Met: Describes how global system applies to supply chain • Met: Example of actions decided on at least 1 salient HRs issue: Twinings discloses information of its actions to response its identified human rights risks in its Human Rights Update 2023: 'Internally, we have reviewed and amended our contract template for employment agencies to clearly stipulate that workers should not pay any recruitment fees. We have also trained our local Human Resources teams on the Employer Pays Principle and how to integrate this principle into their work with agencies. Since 2019, in Malaysia and more recently in Thailand, we have been commissioning in-depth assessments with expert labour rights organisations (respectively Impactt and Elevate) in the factories of all suppliers and business partners where migrant workers are present. These in-depth audits take a worker centric approach and seek to understand the entire recruitment journey as well as the current experience of migrant workers.' [Twinings Human Rights Update 2023: cdn.shopify.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Describes how stakeholders involved in decisions about actions taken
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: Describes system for evaluation effectiveness of actions: The 2022 Primark Modern Slavery Statement indicates: '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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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 system for tracking or monitoring the actions taken in response to human rights risks and impacts and for evaluating whether the actions have been effective or have missed key issues or not produced the desired results across all Group businesses and human rights issues. [Primark 2021-22 Sustainability Ethics Report, 30/11/2022: primark.a.bigcontent.io]</p> <ul style="list-style-type: none"> • Not Met: Example of lessons learned from evaluation effectiveness of actions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involves stakeholders in evaluation effectiveness of actions
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 <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes 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 mechanism(s) for 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: Grievance mechanism 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: Grievance mechanism available in appropriate languages and workers made 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. No further details found during last revision. [Speak up policy, N/A: abf.co.uk] • Not Met: Describes how workers in supply chain access 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. No further details found during last revision. [Primark Supplier Code of Conduct Update 2019, 12/2019: primark.a.bigcontent.io] & [ABF Supplier code of conduct, N/A: abf.co.uk] • Not Met: Expects suppliers to convey expectation to their suppliers
C.2	Grievance mechanism(s) for external individuals and communities	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: Grievance mechanism accessible to all external individuals and communities: 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'. The mechanism was accessed and is open to anyone [Speak up policy, N/A: abf.co.uk]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware: The Company states in its Speak Up Policy: 'If you choose to phone the SpeakUp line, you will hear a recorded message (in your local language) which asks you to provide the access code unique to your business. [...] If you choose to use the SpeakUp webservice, you will need to provide the relevant access code and will then be given the opportunity to write a message detailing your concern. Text on the webservice is in your local language'. The system is available in many different languages. However, it is not clear how the Company ensures all affected external stakeholders at its own operations are made aware of it. [Speak up policy, N/A: abf.co.uk] • Not Met: Describes how external individuals/communities access grievance mechanism • Not Met: Expects supplier to convey expectation to their suppliers
C.3	Users are involved in the design and performance of the 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: Describes how users engaged on design and performance • Not Met: Provides user engagement examples (at least two) on design and performance <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes how users engaged on improvement of mechanism • Not Met: Provides user engagement examples (at least two) on improvement
C.4	Procedures related to the mechanism(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: Describes procedure and timescales for managing complaints or concerns: 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. No further details found during last revision. [Speak up policy, N/A: abf.co.uk] & [Sugar _ Grievance remediation - AB, 2020: absugar.com] • Not Met: Describes technical, financial, advisory support to enable equal access <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism • Not Met: Describes escalation to senior levels / independent adjudicators: 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] & [Sugar _ Grievance remediation - AB, 2020: absugar.com]
C.5	Prohibition of retaliation for raising complaints or concerns	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: Public statement prohibiting retaliation against workers/stakeholders: 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'. As indicated in C.2, the mechanism seems accessible to anyone. [Speak up policy, N/A: abf.co.uk] • Not Met: Describes 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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. No further details found during last revision. [Speak up policy, N/A: abf.co.uk]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Specifies no legal action, firing or violence • Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	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 legal rights • Not Met: Does not require confidentiality provisions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Cooperates with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts	2	<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 approach taken to remedy adverse HRs impacts: The 2022 Primark Modern Slavery Statement indicates: 'Primark identified social media videos posted by a female worker sharing her experience of verbal harassment by male production floor management in a factory producing for Primark. Primark was able to conduct a confidential interview with the worker and followed up with the factory on appropriate actions. Following an investigation, the managers involved were removed from their positions on the factory floor with disciplinary warnings and sexual harassment training'. [Primark 2021 Modern Slavery Statement, 03/2022: primark.a.bigcontent.io] • Not Met: Describes how remedy would be provided if no adverse impact identified <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes changes to systems, processes and practices to prevent future impacts: See above: 'The factory was required to implement a range of measures including implementing anti-harassment policies, establishing a worker-management committee to provide oversight, providing training for committee members, and raising awareness among workers on the role of the committee and how to raise grievances related to harassment and abuse'. [Primark 2021 Modern Slavery Statement, 03/2022: primark.a.bigcontent.io] • Met: Describes approach to monitoring/implementing agreed remedy: Also: 'Primark has followed up with individual female workers to assess whether these measures have been effective and satisfactory. During a follow-up visit in June 2021, female workers reported that they were satisfied with the actions taken by the factory management. To date, no further incidents have been identified or reported'. [Primark 2021 Modern Slavery Statement, 03/2022: primark.a.bigcontent.io]
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: Discloses number of grievances filed, addressed or resolved and outcomes achieved: Regarding its grievance mechanisms, the 2022 ABF Annual Report indicates: 'In the year to June 2022, 147 notifications were received, of which: 20% were resolved, with outcomes ranging from reviews of processes and support for individual employees to, where necessary, disciplinary procedures being followed; 78% were unsubstantiated and required no action; and 2% remain under investigation'. Besides that, the Company states that 'Between August 2021 and August 2022, 1,209 substantive calls (genuine grievances) were made from the Primark supply chain. Of these, 40 were escalated to Primark and, as of end of September 2022, six were outstanding.' However, no information found specifically on the number of human rights related grievances filed, addressed or resolved and outcomes achieved for its own workers, for external individuals and communities that may be adversely impacted by the Company. [ABF 2022 Annual Report, 09/2022: abf.co.uk] & [ABF 2022 Responsibility Report, 2022: abf.co.uk] • Not Met: Example of how lessons from mechanism improved HRs management system

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes process to evaluate mechanism and changes made as a 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 2021 Modern Slavery Statement, 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 Food and 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 time-bound target: The Company discloses information on living wage, however, it seems to refer to its supply chain. [ABF 2022 Annual Report, 09/2022: abf.co.uk] • 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: Reviews definition living wage with unions
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: Requirements on living wage in supplier codes and 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. [ABF Supplier code of conduct, N/A: abf.co.uk] • Not Met: Describes work with suppliers on living wage <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of payment below living wage in supply chain • Not Met: 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: Describes practices to avoid price or short notice requirements that undermine HRs • Not Met: Describes practices to pay suppliers in line with agreed timeframes • Not Met: Reviews own operations to mitigate negative impact of purchasing practices <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Example of assessing and changing of 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 including manufacturing sites

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> Not Met: Discloses names and locations of significant parts of supply chain and how significance was defined: 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 details found during last revision. [Twinings Supply Chain Map, N/A: sourcedwithcare.com] & [Sourcing map - AB Sugar, N/A: absugar.com] Not Met: Discloses direct or indirect suppliers involved in higher-risk activities
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: Indicates it does not use child labour: The 2022 ABF Annual Report indicates: 'Our businesses prohibit all forms of modern slavery, including child labour'. [ABF 2022 Annual Report, 09/2022: abf.co.uk] Not Met: Age verification of recruited workers <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Remediation if child labour found in operations
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: Requirements on child labour in supplier codes and contracts: The Company indicates in its ABF 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. No further evidence found of a Company-wide policy on age verification. No further details found during last revision. [ABF Supplier code of conduct, N/A: abf.co.uk] Not Met: Describes work with suppliers on eliminating 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. No further details found during last revision. [Twinings Progress Report 2021, 2021: sourcedwithcare.com] <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Assessment of scope of child labour in supply chain Not Met: Analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
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/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, within its own operations, do not pay any recruitment fees or related costs to secure a job was found. No further details found during last revision. [ABF Supplier code of conduct, N/A: abf.co.uk] • Not Met: Commitment to fully reimburse recruitment fees paid <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes implementation and monitoring in own operations, incl. service providers
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: Requirements on debt/fees in supplier codes and 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'. [ABF Supplier code of conduct, N/A: abf.co.uk] • Not Met: Describes work with suppliers on debt/fees for job seekers/workers: Twinings Ovaltine Human Rights Update 2023 indicates: 'Since 2019, in Malaysia and more recently in Thailand, we have been commissioning in-depth assessments with expert labour rights organisations (respectively Impactt and Elevate) in the factories of all suppliers and business partners where migrant workers are present. These in-depth audits take a worker centric approach and seek to understand the entire recruitment journey as well as the current experience of migrant workers. Where issues have been identified, we have worked intensively with our business partners to remediate them. This has included refunding all previous worker fees, returning passports and providing in-depth training for our business partners and their labour agencies on eliminating recruitment fees going forward'. However, it is not clear how it specifically works with suppliers on how to eliminate recruitment fees and related costs, including by ensuring full reimbursement to workers where relevant. [Twinings Human Rights Update 2023: cdn.shopify.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment scope of payment of recruitment fees in supply chain • Not Met: Analysis of trends demonstrating progress
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 regularly, 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: Worker payslips shows wages and legitimate deductions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes implementation and monitoring in own operations, incl. service providers

Indicator Code	Indicator name	Score (out of 2)	Explanation
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: Requirements on paying in full and on time in supplier codes and contracts: The ABF Supplier Code of Conduct indicates: 'Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded'. However, no evidence found that suppliers are required [contractually or through its supplier code] to pay on time. [Twining's Supplier Code of Conduct Update 2019, 8/2019: sourcedwithcare.com] & [ABF Supplier code of conduct, N/A: abf.co.uk] • Not Met: Describes work with suppliers on paying workers regularly, in full and on time <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment scope of failure to pay workers in full and on time in supply chain • Not Met: 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 of workers: 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). No further details found during last revision. [ABF Supplier code of conduct, N/A: abf.co.uk] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes implementation and monitoring in own operations, incl. service providers
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: Requirements on free movement in supplier codes and 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'. [ABF Supplier code of conduct, N/A: abf.co.uk] • Not Met: Describes working with suppliers on free movement of workers <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of restriction of movement in supply chain • Not Met: 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 to measures prohibiting interference with trade unions: The ABF Supplier Code of Conduct 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). No further details found during last revision. [ABF Supplier code of conduct, N/A: abf.co.uk] • Not Met: Discloses % total workforce covered by CB agreements <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.6.b	Freedom of association and collective bargaining (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: Requirements on FoA/CB in suppliers codes and contracts: The ABF Supplier Code of Conduct 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 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. No further details found during last revision. [ABF Supplier code of conduct, N/A: abf.co.uk] • Not Met: Describes work with suppliers on FoA/CB <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of restriction of FoA/CB in supply chain • Not Met: 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.' [ABF Health and safety policy, N/A: abf.co.uk] • Met: Discloses injury rate or lost days for own workers in last reporting period: The Company indicates that in 2022, the injury rate was 0.36%. [ABF 2022 Annual Report, 09/2022: abf.co.uk] • Met: Discloses fatalities for own workers in last reporting period: The 2022 ABF Annual Report indicates: 'We are deeply saddened to report that in the year there were four work-related fatalities: one to an employee and three to contractors'. [ABF 2022 Annual Report, 09/2022: abf.co.uk] • Not Met: Discloses occupational disease rate for own workers in last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Sets targets for H&S performance: It is not clear the targets related to injury rates or lost days (or near miss frequency rate) and fatalities and occupational disease rates for the last reporting period. • Not Met: Met targets or explains why not or how improve H&S management systems: The Company indicates how it improves safety performance: 'Across the Group, our businesses focus on the following key safety risks: harm from moving vehicles; falls from height; machinery safeguarding; the storage and handling of hazardous materials; manual handling of heavy and awkward loads; working in confined spaces; and the management of contractors. While targeting their safety risk mitigation measures on these risks, our businesses also focus their safety efforts in four key overarching areas: providing strong leadership from senior management; identifying and managing activities with the highest risk of fatal and serious injuries; supporting line managers accountable for workplace safety with safety specialists; and actively involving employees in their own safety. In addition, contractors are increasingly involved in safety management, helping to reduce their injury rates. We continuously assess the safety risks across our businesses and for the people who work for us or with us. At the end of the reporting period, 18% of ABF's manufacturing sites held external certifications for safety, including ISO 45001 standards'. However, no information found on work done to improve health management system. [ABF 2022 Health, safety EGS Insights, 2022: abf.co.uk]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Requirements on H&S in supplier codes and contracts: 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. [ABF Supplier code of conduct, N/A: abf.co.uk] • Not Met: Discloses injury rate or lost days in supply chain in last reporting period • Not Met: Discloses fatalities for workers in supply chain in last reporting period • Not Met: Discloses occupational disease rate in supply chain in last reporting period Score 2 <ul style="list-style-type: none"> • Not Met: Describes work with suppliers of H&S • Not Met: Assessment of scope of H&S issues in supply chain • Not Met: Analysis of trends demonstrating progress
D.1.8.a	Land rights: Land acquisition (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes approach to indentifying land tenure rights holders and negotiating compensation: 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. No further details found during last revision. [Ilovo Guidelines on Land and Land Rights, N/A: ilovosugarafica.com] Score 2 <ul style="list-style-type: none"> • Not Met: Describes approach to compensation including valuation • Not Met: Describes steps to meet IFC PS 5 in state deals
D.1.8.b	Land rights: Land acquisition (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Requirements on land and tenure rights in supplier codes and 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. Ilovo'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. No further details found during last revision. [ABF Supplier code of conduct, N/A: abf.co.uk] & [Ilovo Guidelines on Land and Land Rights, N/A: ilovosugarafica.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Describes work with suppliers on land issues: The 2022 ABF Modern Slavery Statement indicates: 'The Twinings Community Needs Assessment (TCNA) framework has been created in consultation with expert organisations [...] to help it assess and understand communities' needs on the ground. Assessments are carried out on a rolling basis every two to three years by the 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. So far, Twinings has conducted 114 TCNAs in its key sourcing regions – China, India, Indonesia, Kenya, and Sri Lanka, covering 69% of its tea supply chain. Following the TCNA, Twinings works with producers to develop an action plan to address prioritised issues and monitor improvements over time. It also uses the findings to help develop tailored interventions'. However, it is not clear how the Company works with suppliers to improve their practices in relation to land use/ acquisition. [ABF 2022 Modern Slavery Statement, 11/2022: abf.co.uk] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Requirement for suppliers to provide compensation in resettlement • Not Met: Assessment of scope of land rights issues in supply chain • Not Met: 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: Describes preventative/corrective action plans for 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 to 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 furrow 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: Sets targets on water stewardship that consider water use by local communities: 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 in meeting targets and trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
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: Requirements on access to water and sanitation in supplier codes and 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. No further details found during last revision. [ABF Supplier code of conduct, N/A: abf.co.uk] • Met: Describes work with suppliers on access to water: 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 of scope of water and sanitation issues in supply chain • Not Met: 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: Describes processes to stop harassment and violence against women: It indicates: 'The aim of the Speak Up programme is to provide a mechanism for reporting, investigating and remedying inappropriate behaviour. Inappropriate behaviour takes place where an individual or individuals associated with ABF has done, is doing or is going to do something which is inappropriate, improper, dishonest, illegal or dangerous. This includes: [...] engaging in sexual or psychological harassment'. However, it is not clear the steps and processes the Company has in place to address harassment intimidation and violence against women. [Speak up policy, N/A: abf.co.uk] • Not Met: Working conditions take into account gender issues • 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: Analysis of trends demonstrating progress 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: Requirements on women's rights in supplier codes and contracts

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Describes work 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's: Protecting women and girls, N/A: sourcedwithcare.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of women's rights issues in supply chain • Not Met: 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: Requirements on living wage in supplier codes and 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: Describes work with suppliers on living wage: 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 scope of payment below living wage in supply chain • Not Met: 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: Describes practices to avoid price or short notice requirements that undermine HRs: 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 2021 Modern Slavery Statement, 03/2022: primark.a.bigcontent.io] • Met: Describes practices 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 2021 Modern Slavery Statement, 03/2022: primark.a.bigcontent.io] • Not Met: Reviews own operations to mitigate negative impact of purchasing practices <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Example of assessing and changing of 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 including manufacturing sites: The Company has disclosed the supplier map of Primark. The 2021 Primark Modern Slavery Statement indicates: '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_web, N/A: corporate.primark.com] & [Primark 2021 Modern Slavery Statement, 03/2022: primark.a.bigcontent.io] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Discloses names and locations of significant parts of supply chain and how significance was defined: The Company has disclosed the supplier map of Primark. It includes names, locations, workers and gender breakdown. The 2021 Primark Modern Slavery Statement indicates: 'The factories featured on the map are Primark's suppliers' production sites which represent over 95% of Primark products for sale in our stores. Production sites are included once they have worked for us for over one year'. [Primark Global Sourcing Map_web, N/A: corporate.primark.com] & [Primark 2021 Modern Slavery Statement, 03/2022: primark.a.bigcontent.io] • Not Met: Discloses direct or indirect suppliers 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: Requirements on child labour in supplier codes and 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. No further details found during last revision. [Primark Supplier Code of Conduct Update 2019, 12/2019: primark.a.bigcontent.io] • Met: Describes work with suppliers on eliminating 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 2021 Modern Slavery Statement, 03/2022: primark.a.bigcontent.io] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of child labour in supply chain • Not Met: Analysis of trends demonstrating progress

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: Requirements on debt/fees in supplier codes and 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: Describes work with suppliers on debt/fees for job seekers/workers: 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 2021 Modern Slavery Statement, 03/2022: primark.a.bigcontent.io] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment scope of payment of recruitment fees in supply chain • Not Met: Analysis of trends demonstrating progress
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: Requirements on paying in full and on time in supplier codes and 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. No further details found during last revision. [Primark Supplier Code of Conduct Update 2019, 12/2019: primark.a.bigcontent.io] • Not Met: Describes work with suppliers on paying workers regularly, in full and on time <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment scope of failure to pay workers in full and on time in supply chain • Not Met: 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: Requirements on free movement in supplier codes and 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: Describes working with suppliers on free movement of workers: 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. No further details found during last revision. [Primark 2021 Modern Slavery Statement, 03/2022: primark.a.bigcontent.io] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of restriction of movement in supply chain • Not Met: 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: Requirements on FoA/CB in suppliers codes and 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: Describes work with suppliers on FoA/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 2021 Modern Slavery Statement, 03/2022: primark.a.bigcontent.io] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of restriction of FoA/CB in supply chain • Not Met: 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: Requirements on H&S in supplier codes and contracts: 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: Discloses injury rate or lost days in supply chain in last reporting period • Not Met: Discloses fatalities for workers in supply chain in last reporting period: The Company states that in 2022 there were 3 work-related fatalities among contractors and 1 among its own employees. However, no information was found on the supply chain. [ABF 2022 Health, safety EGS Insights, 2022: abf.co.uk] • Not Met: Discloses occupational disease rate in supply chain in last reporting period: The Company states that in 2022 there were 41 cases of Lost Time Injuries among contractors and 355 among its own employees. However, no information was found on the supply chain. [ABF 2022 Health, safety EGS Insights, 2022: abf.co.uk]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes work with suppliers of 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 2021 Modern Slavery Statement, 03/2022: primark.a.bigcontent.io] • Not Met: Assessment of scope of H&S issues in supply chain • Not Met: 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: Requirements on women's rights in contracts/codes with suppliers • Met: Describes work 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 of scope of unsafe working conditions/discrimination against women in supply chain • Not Met: 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: Requirements on working hours in codes/contracts with suppliers: 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] & [ABF Supplier code of conduct, N/A: abf.co.uk] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes work with suppliers on working hours: The Company has provided feedback to CHRB regarding this datapoint, but it was not material • Not Met: Assessment of scope of excessive working hours in supply chain • Not Met: Analysis of trends demonstrating progress

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)		<p>remediation". However, there is no evidence suggesting the company provided remedy to the affected stakeholders. [The Guardian, 24/06/2020: theguardian.com]</p> <ul style="list-style-type: none"> • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <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

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