PRIMARK

Sustainability and Ethics

Progress Report 2025/26



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Introduction from our CEO



Each year, this report gives us an opportunity to reflect on the progress we've made, but also to look ahead. This year, we've taken a step back to consider what the next phase of sustainability looks like for Primark.

Geopolitical instability has impacted supply chains and the significance of sustainability for some businesses. We, however, do not believe it should become an excuse to retreat. Circumstances may change. Our values do not.

Businesses do need to evolve. Sustainability has for too long been framed through commitments and targets. Those are important but a long list of commitments is not a strategy. The focus has to move beyond distant immeasurable promises to real impact today, while supporting long-term business resilience. For Primark, this means two guiding principles: sustainability will be core to how we do business, and we will focus on where we can have the greatest impact.

It will continue to be built into how we design, source, operate and grow, supported by colleagues and partners. Done well, it will help us produce great quality products, strengthen our supply chain, manage risk and create long-term advantage for Primark, all while reducing our impact over time.

Another year of progress

We're far from the beginning. Sustainability and ethics are already deeply embedded in Primark.

In this last year, 21% of all jersey products and 15% of our denim[1] products sold were circular by design[2] with our scale this is important - showing it can be both affordable and at scale. 81%[Δ] of our clothes sold were made using recycled or more sustainably sourced materials[3].

There must be transparency and trust in how our clothes are made. Our supply chain social audits form the basis of this. We carried out over 2,300 social audits[4] in our tier one suppliers' factories this year and we continue to invest in programmes to support workers in our supply chain.

It's clear to see that retail customer expectations have evolved and innovation in textile waste technology is finally beginning to look scalable. Our partnership with Circ will see the introduction of recycled polyester made from textile waste into Primark clothing for the first time.

Businesses do need to evolve. Sustainability has for too long been framed through commitments and targets. Those are important but a long list of commitments is not a strategy. The focus has to move beyond distant immeasurable promises to real impact today, while supporting long-term business resilience. For Primark, this means two guiding principles: sustainability will be core to how we do business, and we will focus on where we can have the greatest impact.

1. This metric includes products containing cotton from the Primark Cotton Project, recycled cotton and Cotton made in Africa® (CmiA). See Primark preferred sources. As per the foundational criteria of Circular Product Standard 1.0.
2. Inspired by the Ellen MacArthur Foundation's vision of a circular economy for fashion, Primark's Circular Product Standard sets out the criteria products must meet to be considered circular by design, including requirements relating to materials, durability and recyclability.
3. This metric includes products containing recycled polyester, recycled polyamide/nylon, recycled acrylic, recycled cotton, cotton from the Primark Cotton Project, Cotton made in Africa® (CmiA), organic cotton, viscose, modal and lyocell. See Primark preferred sources.
4. During calendar year 2025.

Introduction from our CEO continued

Making deliberate choices

I said in this report last year that we were reviewing our Primark Cares sustainability strategy. We've spent the last 12 months doing both some soul searching and detailed planning on this.

This year, Primark passed the 500-store mark. As we prepare to become a standalone company, we're entering a more ambitious phase of growth, entering new markets and expanding our online capabilities. For many, growth and sustainability are opposing ideas. However, we see our scale as an opportunity, as it increases our ability to drive change for better.

So for me, the question is not if sustainability can sit alongside growth but how do we build sustainability into the way we grow. That means being disciplined about where we invest, why and what each investment will deliver.

As we reviewed our approach in detail over the past year, we've looked hard at what Primark Cares has achieved, what we have learned, in addition to where Primark has the strongest foundations and greatest ability to influence outcomes.

An evolving strategy

With a clear focus on where we can have the greatest impact, the next phase of Primark Cares will accelerate progress across three key areas:

1

Reducing textile waste and keeping clothes in use for longer

We will increase our focus on circular design, fibre innovation and finding better ways to use textile waste created across our supply chain. Our aim is clear: to continue offering great value fashion while reducing textile waste and helping Primark clothes stay in use for longer.

2

Building a stronger, more adaptable and responsible supply chain

As Primark grows, our supply chain must continue to grow responsibly with us. We will strengthen how we select, evaluate and work with our supply chain partners, building long-term relationships with those who share our values and can support a more responsible, transparent and resilient way of doing business.

3

Creating more opportunities for women across our value chain

Primark is a business built around, and for, women. The majority of our customers and colleagues are women, as are many of the people working across our global supply chain. We will bring together our product initiatives, supply-chain programmes and charity partnerships in a more joined-up, data-led approach focused on meaningful and measurable outcomes for women.

This is about focus and delivery. These are the principles we apply to the commercial and operational parts of our business. So, they should apply to sustainability.

As Primark grows, so does our impact and responsibility to act, along with our ability to drive change. The next phase of sustainability will be about making focused choices, backing them and using our scale where it matters most.

We will continue to report transparently on the progress we make. I look forward to sharing our updated Primark Cares strategy in full next year.

Eoin Tonge
Primark CEO

Our priority areas

Primark is evolving its approach to sustainability and ethics, exploring three connected areas where its actions can have the greatest impact.

1 **Circularity**
Reducing textile waste and keeping clothes in use for longer.

2 **Supply Chain Resilience**
Building stronger, more adaptable and responsible supply chains.

3 **Creating more opportunities for Women**
Creating opportunities for women across our value chain.

As we reviewed our approach in detail over the past year, we've looked hard at what Primark Cares has achieved, what we have learned and where Primark has the strongest foundations and greatest ability to influence outcomes.

Our priority areas: 1 Circularity



Spotlight story

Our Circular Product Standard

Three years ago, we launched our Circular Product Standard (CPS). It was inspired by the Ellen MacArthur Foundation's 'vision of a circular economy for fashion' in which products are 'used more, made to be made again, and made from safe and recycled or renewable inputs'.

Our CPS sets out the criteria that our products must meet to be considered circular by design. For Primark this means:

Durability
Designed in line with Primark's Durability Framework so clothes can be loved and worn for longer.

Materials
Made with recycled or more sustainably sourced fibres[1].

Recyclability
Designed to be more technically recyclable at commercial scale.

We continue to scale our use of circular by design practices in our business, working towards a system where clothes are kept in use for longer and textiles are used again.

See more about our circularity performance on page 10.

Evolving our approach

This year, we launched an updated CPS, informed by 18 months of collaboration with suppliers and recyclers. In addition to insights from our supplier and colleague training programme and updates to legislation.

We've expanded the range of materials the CPS covers to include cotton and polyester, and set criteria for the use of water soluble ink prints. We've also introduced a 'Progressive' level for products to meet, raising the criteria we use for materials, durability and recyclability requirements.

To embed circular design principles into product development and decision-making, we collaborated with the Circular Textiles Foundation to develop a training programme to build capability within our business and our suppliers. The programme included deep dives with buyers, designers, quality teams and suppliers across nine product categories.

Our CPS is central to our product decisions. This updated version will help us take a pragmatic approach to scaling the number of our products that are circular by design by balancing material performance, product functionality and recyclability. We'll continue to review our CPS and embrace innovative technological developments as we support the move towards a more circular fashion system.

1. This includes products containing cotton from the Primark Cotton Project, recycled cotton and Cotton Made in Africa®. See Primark preferred sources.

Our priority areas: 2 Supply Chain Resilience



Spotlight story

Helping our suppliers use resources more efficiently

We continue to work with suppliers to improve resource efficiency across our supply chain. In Bangladesh, China and India, 104 factories have been involved in a pilot of our Primark Resource Efficiency Programme (PREP).

The aim of PREP is to promote the efficient use of finite resources in factory operations, including energy, water and chemicals. It is designed to identify opportunities that may be mutually beneficial to suppliers and Primark. For example, moving away from fossil fuels and using alternative energy sources can increase business resilience to volatility in the cost and availability of energy. In addition, as water stress becomes increasingly prevalent, particularly in locations where the textile industry operates, reducing demand on water sources and increasing water recycling rates can support operational resilience.

In just four years since the pilot began, we have seen significant efficiency gains across the factories in the programme. Recent figures show that 73% of participating factories had a 2030 water reduction target in place and 80% of those had a documented action plan to support it. In Bangladesh, 29 participating factories achieved a total water footprint reduction of 1.6m m^3 between 2024 and 2026.

In India, 15 factories achieved a significant greenhouse gas (GHG) emissions saving of around 29kt tCO_2e per year. They have also completed approximately 69% of the actions identified over the course of the project.

Towards the end of 2026, we launched the next wave of PREP in India. This iteration of the programme looks at air emissions, including volatile organic compounds (VOCs) and fugitive emissions, and monitors thermal conditions within facilities to support operational resilience as global temperatures rise.

PREP is a core programme supporting our ambition to help our supply chain become more resilient. It takes a short and long term view, bringing immediate resource gains to our suppliers and helping them prepare for the potential impacts of a changing climate.

Our priority areas: 3 Creating more opportunities for Women



Spotlight story

Helping smallholder farmers diversify their income

In India, many workers are entitled to government-funded welfare support, like pensions, insurance and loans. Yet it can be difficult for people to access them, particularly those who have low financial literacy. That is the case for many of the women smallholder farmers involved in our Primark Cotton Project.

Through support to Haqdarshak, a social enterprise in India, we're helping to increase farmers' financial literacy and support them with accessing social security schemes. Local women are trained to act as the last-mile link between farmers and government services. They are known as Haqdarshikas, and they offer hands-on support to explain the schemes available and guide women through the process of accessing them.

As of August 2026, Haqdarshak has helped 873 women to access benefits and provided 788 women with financial literacy training to help them manage all income and support they receive.

About Primark

Primark was founded on a mission that everyone deserves to look and feel good, without paying more. We stand for great value without compromise, offering affordable fashion and everyday essentials that are made to be worn and loved for longer.

Founded in Ireland in 1969, Primark is now an international fashion retailer operating across 21 countries in Europe, the US and the Middle East, employing more than 81,000 colleagues. Primark is built on a belief and passion for physical stores – helping to bring high streets and retail centres to life and creating joyful, social experiences.

1969
Founded in Ireland

21[1]
Operating markets

518[2]
Stores

81,358[3]
Colleagues

£9,820m
2025/26 Revenue

£1,005m
2025/26 Adjusted operating profit

15
Sourcing countries

2,322[Δ4]
Number of ethical trade social audits

Metrics independently assured by Ernst & Young (EY) against the International Federation of Accountants' International Standard on Assurance Engagements Other than Audits or Reviews of Historical Financial Information – known as ISAE 3000 (Revised). These are highlighted in this report with the symbol Δ.

Our commitment to responsible sourcing

We have a longstanding commitment to support decent work and responsible business practices in our supply chain.

This is set out in our Supply Chain Human Rights Policy which is underpinned by the United Nations Guiding Principles on Business and Human Rights (UNGPs).
Our Supplier Code of Conduct translates our human rights commitments into the expectations we have of our suppliers.

All the tier one factories approved to make our products are audited at least once a year against our Supplier Code of Conduct. It includes our requirements on labour rights including health and safety, freedom of association, discrimination and child and forced labour. New factories must pass one of our audits before orders are placed.

We take a risk-based, worker-centric approach to human rights due diligence, drawing on multiple information sources to identify priorities and manage risk across our supply chain. These include desk-based research, social audits, direct engagement with workers and their representatives, and participation in local and international forums. This approach includes several types of engagement such as:

- Country risk assessments
- Stakeholder and supplier engagement
- Rights holder consultation and worker engagement
- Safe buildings for workers

Grievance mechanisms

We believe grievance mechanisms are fundamental to supporting decent workplaces by providing workers with a way to raise concerns and seek remedy.

As part of our Supplier Code of Conduct, our suppliers are expected to have an effective grievance process in place. We have our own grievance mechanism, Tell Us, which is available for any worker or stakeholder in our supply chain. We support industry-wide mechanisms in some of our sourcing regions.

See more about grievance mechanisms on page 17.

For more on our commitment to responsible sourcing, see the ABF Responsibility website

1. The number of markets in operation as at ABF's financial year end of 12 September 2026 was 19[Δ]. Primark expanded to Bahrain and Qatar in September and October respectively.
2. As of 24 November 2026, includes franchises.
3. As at ABF's financial year end of 12 September 2026.
4. As of 31 December 2025.

A message from our Primark Cares Director



A sustainability strategy is about long-term change. It requires businesses to think and act differently, often while navigating complex commercial realities and an evolving external landscape. Progress is rarely straightforward, and no single organisation or team can deliver it alone.

That is why collaboration remains central to our approach at Primark. Since launching Primark Cares in 2021, we have worked to embed sustainability across our business, bringing together colleagues from across Primark and working closely with our suppliers and wider industry partners. We have invested in the relationships, skills and capabilities needed to turn our ambitions into practical action.

We know these are long-term programmes and that meaningful change takes time. But it is equally important to recognise the progress made along the way. Every milestone reached, capability strengthened and lesson learned matters.

As we reflect on the past year, we are proud of the progress we have made and grateful to the colleagues, suppliers and partners who have contributed to it. We have learned along the way too, adapting our approach where needed and being honest about the challenges that remain.

This year has also been an important opportunity to step back and consider where we go next. We have been looking carefully at the progress we have made, what we have learned and where we believe we can make the greatest difference in the years ahead. That work is helping to shape the next phase of our sustainability strategy, building on the foundations we have established while evolving our approach for the future.

We enter this next phase with a clearer understanding of where we can have the most impact, and with strong foundations to build from. There is much more to do, but we should also take confidence from what we have achieved so far. By recognising that progress while continuing to challenge ourselves on what comes next, we can keep moving forward together.

Lynne Walker
Director of Primark Cares

We enter this next phase with a clearer understanding of where we can have the most impact, and with strong foundations to build from. There is much more to do, but we should also take confidence from what we have achieved so far. By recognising that progress while continuing to challenge ourselves on what comes next, we can keep moving forward together.

2025/26 highlights

This year marks five years since the launch of our sustainability strategy Primark Cares, which focused on the areas of Product, Planet and People. We have been reviewing our approach to sustainability over the past 12 months. Our updated strategy will centre around our strengths as a business: our products, our scale and our reach across the supply chain. In the context of tighter regulation, changing technology and consumer expectations, the aim of our renewed strategy is to support long-term responsible growth. We will publish our updated strategy next year.

Product

Giving clothes a longer life



81%Δ

of clothing units sold contained recycled or more sustainably sourced materials[1]

64%Δ

of cotton clothing unit sales contained cotton from Primark preferred cotton sources[2]

6%Δ

of all clothing unit sales are circular by design, meeting the 'Foundational' criteria set out by our CPS[3]. Within focus categories, **21%** of all jersey and **15%** of all denim clothing unit sales are now circular by design[4]

Planet

Protecting life on the planet



21%

decrease in total greenhouse gas (GHG) emissions across our value chain compared to 2025 and **26%**Δ against our 2018/19 base year

2%

reduction in Scope 1 and 2 (market-based) GHG emissions compared to 2025 and a **72%** decrease compared to our 2018/19 baseline

95%Δ

of waste produced in Primark's operations was diverted from landfill this year

People

Improving people's lives



Over 66,000

vision tests across 28 supplier factories, resulting in more than 25,000 workers receiving glasses

873 women farmers

in the Primark Cotton Project accessed social welfare schemes in India

1st impact evaluation

of an external grievance mechanism conducted by a third party

Colleagues, Inclusion and Community Impact



100+

partnerships globally supporting disabled people and others facing barriers to employment.

17,000 colleagues

have access to our digital learning platform

£1.6m

donated to charitable organisations and community partners

1. Recycled polyester, recycled polyamide/nylon, recycled acrylic, recycled cotton, cotton from the Primark Cotton Project, Cotton made in Africa® (CmiA), organic cotton, viscose, modal and lyocell. See Primark preferred sources.
2. Cotton from the Primark Cotton Project, recycled cotton, organic cotton and Cotton made in Africa® (CmiA). See Primark preferred sources.
3. As per Primark Circular Product Standard 1.0.
4. This metric includes products containing cotton from the Primark Cotton Project, recycled cotton and Cotton made in Africa® (CmiA). See Primark preferred sources.

Product

We're moving towards a more circular approach to fashion by embedding circular principles across product development and our business operations. This includes designing clothes to last longer, increasing our use of recycled and Primark preferred sources, and continually evolving our approach to align with industry practice and emerging regulation.



Impact metrics

- As of July 2026, 81%[Δ] of clothing units sold contained recycled or more sustainably sourced materials
- 64%[Δ] of cotton clothing unit sales contained cotton from Primark preferred sources
- 6%[Δ] of all of Primark's clothing unit sales are circular by design, meeting the 'Foundational' criteria set out by our Circular Product Standard 1.0

Our Product commitments 2021-2026

- We will strengthen the durability of our clothes by 2025
- Our clothes will be recyclable by design by 2027
- All our clothes will be made from recycled or more sustainably sourced materials by 2030

Product continued

Clothes made from recycled or Primark preferred sources

We're increasing the use of recycled material in our clothes alongside using more of our preferred sources.

As of July 2026, 81%[A] of clothing units sold contained recycled or more sustainably sourced materials (recycled polyester, recycled polyamide/nylon), recycled acrylic, recycled cotton, cotton from the Primark Cotton Project, Cotton made in Africa® (CmiA), organic cotton, viscose, modal and lyocell)[1] (74% in 2024/25).

This figure includes all clothes sold that contained any of the fibres listed in our online Glossary and that meet our minimum fibre content protocols.

Partnering on cotton and fibre innovation

A major driver of our progress in this area is our partnership with Recover™, who transforms textile waste into high-quality recycled cotton fibres and blends. We have increased our use of their RCotton2 range across jersey, denim and casual trousers categories.

This year, we also added traceable cotton certified to the Cotton made in Africa® (CmiA) Standard as one of our preferred cotton sources, alongside organic, recycled and cotton from the Primark Cotton Project. CMiA aims to drive lower-impact farming practices, support smallholder farmers and empower women.

As of July 2026, 64%[A] of cotton clothing unit sales contained cotton from Primark preferred sources[1] (cotton from the Primark Cotton Project, recycled cotton, organic cotton and Cotton made in Africa® (CmiA)) (57% in 2024/25).

Looking ahead, we're doubling down on our efforts to eliminate conventional cotton, including by diversifying our Primark preferred sources and supporting textile-to-textile recycling innovation.

In September 2026, we announced a long-term partnership with Circ® to introduce textile-to-textile recycled polyester in our clothing, marking our first multi-year offtake agreement with a recycler. See here for more information.



Clothes designed to be recycled

Scaling circular design is central to our sustainability strategy. For us, this means designing products that can stay in use for longer, be reused and, where possible, be recycled at the end of their useful life.

Although we still face challenges like the availability of technology and infrastructure at scale, we continue to make steady progress on embedding circular design across our product teams and suppliers.

As of July 2026, 6%[A] of all of Primark's clothing unit sales are circular by design, meeting the 'Foundational' criteria set out by our Circular Product Standard 1.0.

Within our focus categories, 21% of all jersey and 15% of all denim clothing unit sales are now circular by design. This metric includes products containing cotton from the Primark Cotton Project, recycled cotton and Cotton made in Africa® (CmiA)[1] (5% circular by design, 20% of jersey and 8% of all denim in 2024/25).

1. See Primark preferred sources.
2. Percentages are based on wash reports received and recorded.

Affordable clothes made to last

Extending the life of our clothes remains a key focus for us. In 2024, we published our Durability Framework, developed in consultation with WRAP and the UK Textiles Pact. It provides practical durability criteria that we use to test our machine washable clothing against.

As of July 2026, 62% of denim, 80% of jersey and 62% of socks tested achieved our 'Aspirational' level under the Primark Durability Framework[2]. (77 % of denim, 77% of jersey and 69% of socks in 2024/25).

Looking ahead, we will continue to review the framework to support alignment with emerging legislation, evolving industry expectations and in support of other strategic ambitions in the business. We continue to engage with policymakers and peers on what an industry standard could look like.

Educating customers on repairing their clothes

We continue to expand our repair programme, helping customers and colleagues build the skills and confidence to care for and repair their clothing. Since launching in 2021, the programme has grown to nine countries, delivering over 1,000 workshops and offering over 20,000 places.

In 2025, we launched a trial with The Seam, across three UK stores offering in-store clothing repairs and alterations across all clothing brands. We subsidised the services on offer to customers, and repairs were completed same day. We continue to explore future opportunities in this space.

Product continued



Reducing textile waste

We recognise the importance of offering our customers options to give their clothing and textiles another life. Through our Textile Takeback boxes in our stores and head offices, customers and colleagues can drop off unwanted clothing or textiles to be resold, repurposed, or recycled.

Our Textile Takeback programme covers approximately 80% of our stores, collecting over 1,500 tonnes of end-of-use textiles since the programme began in 2020.

Addressing textile waste at source

We continue to work with suppliers and industry partners to improve the management of post-industrial textile waste generated across our manufacturing supply chain.

One key focus is improving the visibility and traceability of post-industrial textile waste. We draw on platforms such as Reverse Resources to help us better understand the volumes, locations and composition of textile waste generated across our supplier network. By doing this we can identify opportunities to reduce textile waste, improve recovery of textile waste and support reuse of resources.

Collaboration remains important to advancing textile waste management. Through initiatives like the Circular Fashion Partnership in Cambodia, we've worked with suppliers, technology providers, waste collectors and industry partners to improve waste visibility, encourage better textile waste management practices and explore recycling opportunities for textiles.



Traceability and transparency

Understanding where the materials in our products come from is an important part of us making informed sourcing decisions. We use TrusTrace, a traceability platform, to record the manufacturing of our products in our supply chain.

100% of clothing, textile and footwear direct suppliers are now onboarded to our traceability programme, bringing the total to more than 290 tier one direct suppliers using the TrusTrace mapping module[1]. Over 200 direct suppliers have also progressed to real-time purchase order traceability, a more granular method of traceability, further enhancing supply chain visibility and transparency.

1. Based on Autumn Winter and Spring Summer 2026 orders.

Planet

We're focused on tackling climate risk in our own operations and supply chain through decarbonisation, water stewardship and responsible chemicals management. We've also been working to reduce waste generated through our value chain, including in our stores.

Impact metrics

- **Total GHG emissions (Scope 1, 2 (market-based) and 3) for the year amounted to 4,765,494[Δ] tCO_2e. This represents a decrease of 21% compared to 2025, and a 26%[Δ] decrease against our 2018/19 base year**
- **2% reduction in Scope 1 and 2 (market-based) GHG emissions compared to 2025 and a 72% decrease compared to our 2018/19 baseline**
- **95%[Δ] of waste produced in Primark's operations was diverted from landfill in 2026**

Our Planet commitments 2021-2026

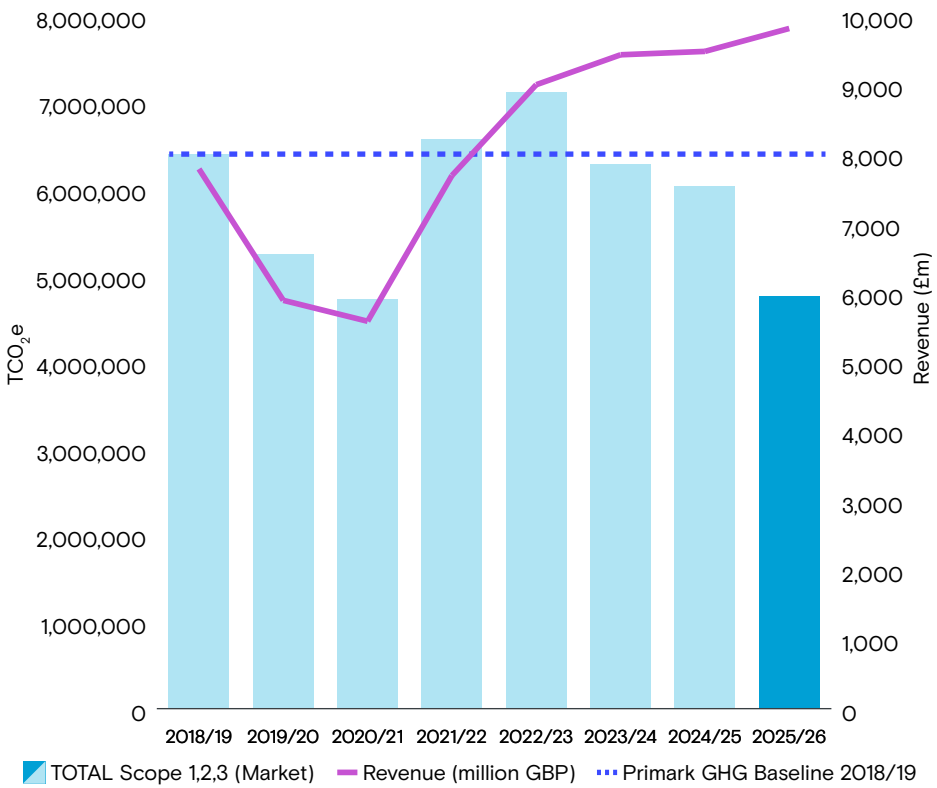
- We will halve carbon emissions across our value chain by 2030
- We will eliminate single-use plastics and all our non-clothing waste by 2027
- Our Primark Cotton Project will use more regenerative agricultural practices by 2030



Planet continued

Greenhouse Gas emissions in 2025/26

Total GHG emissions (Scope 1, 2 (market-based) and 3) for the year amounted to 4,765,494Δ tCO_2e. This represents a decrease of 21% compared to 2024/25, and a 26%Δ decrease against our 2018/19 base year.





Reducing greenhouse gas emissions in our operations (Scope 1 and 2)

For the third year in a row, we have surpassed the threshold of our 2030 SBTi-validated target to keep absolute Scope 1 and 2 (market-based) GHG emissions at least 50% lower than they were in our 2018/19 base year[1], with a total reduction in GHG emissions (market-based) achieved. **These reductions were achieved mainly in our Scope 2 GHG emissions through energy efficiency measures in our depots, offices and stores, as well as the procurement of renewable and low-carbon electricity.**

79% of electricity used in our operations came from renewable sources in 2025/26 compared with 76% in the previous year, bringing us closer to our commitment under the Fashion Industry Charter for Climate Action (FICCA) to source 100% renewable electricity by 2030. Most was purchased from the grid through renewable energy certificates that align with the strict criteria of the RE100, the global corporate renewable energy initiative. As a result, our Scope 2 market-based GHG emissions (based on our actual energy purchasing decisions) are lower than our location-based GHG emissions (based on the average intensity of the grid), giving a more accurate picture.

GHG Protocol Category	Baseline 2018/19	Last Year 2024/25 tCO_2e	Current Year 2025/26	Change against last year	Change against baseline year
Scope 1	20,602	18,326	17,606	-4%	-15%
Scope 2 - Location-based	139,841	86,598	84,083	-3%	-40%
Scope 2 - Market-based		28,375	28,028	-1%	-80%
Scope 1&2 (Market-based)	160,443	46,701	45,634	-2%	-72%
Scope 3	6,246,005	5,993,349	4,719,860Δ	-21%	-24%
TOTAL Scope 1,2,3 (Market)	**6,406,448**	**6,040,050**	**4,765,494Δ**	**-21%**	**-26%Δ**

1. Scope 2 emissions for the 2018/19 baseline year were calculated using the location-based method, which uses location-specific grid-average emissions factors. As we did not procure any renewable or low carbon power at that time, it is considered an appropriate methodology to establish baseline impact. For 2025/26, we are reporting under the market-based method, taking into account our energy contracts and their associated emissions factors. We consider this to be a more accurate calculation method that can reflect the improved emissions performance achieved from renewable energy procurement.

Planet continued

Scope 3 Category	Baseline 2018/19	Last Year 2024/25	**Current Year 2025/26**	Change against last year	Change against baseline year
Cat 01: Purchased Goods and Services	4,771,324	4,880,656	**3,673,167**	-25%	-23%
Cat 02: Capital Goods	123,393	101,472	**73,576**	-27%	-40%
Cat 03: Fuel and Energy Related Activities	34,904	21,382	**20,514**	-4%	-41%
Cat 04: Upstream Transportation	506,663	310,130	**269,102**	-13%	-47%
Cat 05: Waste Generated in Operation	4,297	6,589	**4,572**	-31%	6%
Cat 06: Business Travel	10,573	5,333	**3,025**	-43%	-71%
Cat 07: Employees commuting		5,482	**4,944**	-10%	N/A
Cat 09: Downstream transportation			**4,730**	N/A	N/A
Cat 11: Use of Sold Products	756,260	607,428	**608,335**	0%	-20%
Cat 12: End of Life	38,591	36,444	**36,560**	0%	-5%
Cat 13: Downstream leased assets		18,433	**15,846**	-14%	N/A
Cat 14: Franchises			**5,489**	N/A	N/A
	6,246,005	5,993,349	**4,719,860**[Δ]	-21%	-24%

Reducing Scope 3 GHG emissions in our value chain

Our performance in 2025/26

Scope 3 GHG emissions, which represents 99% of our GHG footprint, decreased by 21% compared to 2024/25. This represents a 24% decrease against our 2018/19 baseline. These reductions were achieved through a decrease in supplier GHG emissions, improved availability of primary data from supplier factories and greater use of recycled or our preferred sources[1].

Supplier GHG emissions have decreased due to an increased use of renewable energy among suppliers; wider industry and supply chain decarbonisation initiatives; continued investments in capacity building, and site-specific action plans for supplier decarbonisation.

We have also continued to evolve our calculation methodology by increasing the volume of primary data sourced from our supply chain, leading to a more accurate reflection of actual performance. For example, by weighting the significance of each factory based on its order volumes for the year. In addition, we recorded a year-on-year reduction in order volumes, which also contributed to the reduction in supply chain GHG emissions compared with last year.

We continue to focus on the following GHG emissions categories: Category 1 (basis of SBTi), and Category 4. Together they accounted for 84% of our Scope 3 footprint for this year.

Category 1: Purchased goods and services

Our emissions reduction work centres on engaging directly with the suppliers that manufacture our products to support their decarbonisation efforts, **increasing our use of Primark preferred sources, and sourcing more products that are circular by design.**

Setting environmental standards for suppliers

Building on our existing supplier requirements, in 2026 we launched our integrated Supplier Environmental Standards, covering clothing, footwear and home textile suppliers, representing approximately 83% of our goods for resale spend in 2026. The standards consolidate our requirements of suppliers across water, waste, chemistry, energy, climate and air emissions.

Compliance is integrated into our Supplier Scorecard, providing us with a holistic measure of supplier environmental performance and strengthening our due diligence approach. The Supplier Environmental Standards also enable us to better target supplier support, improve alignment on data and reporting, and support readiness for future legislation.

Training and capacity building

In China, we have been working with the Chinese National Textile and Apparel Council (CNTAC) as the initiating partner of its Carbon Probe Project, developing practical resources to help suppliers calculate and report their Scope 3 GHG emissions. In 2026, these resources were trialled with seven of our suppliers, helping to strengthen their carbon accounting capabilities and identify opportunities for operational efficiency and energy resilience. Core training has been made publicly available to support wider industry improvements, alongside tailored modules for our own suppliers.

1. Primark preferred sources.

Planet continued

Industry engagement

In 2026, we joined the Apparel and Textile Transformation Initiative (ATTI), a manufacturer-led programme focused on industry-wide action on issues including energy, water and emissions. We support the initiative in our supply chains in Turkey and Bangladesh, providing an opportunity to drive collective action at an industry level.

Primark Resource Efficiency Programme (PREP)

Through PREP, we support supplier factories to use their resources more efficiently. As the programme scales, we're moving towards a more tailored approach, meaning that our support can reflect the needs of individual facilities.

You can learn more about PREP on page 5.

Category 4: Upstream transportation

We primarily transport products by sea, meaning our emissions are lower than if we used air freight. Since 2018, we have partnered with Maersk and, for the past three years, we've invested in its ECO Delivery Ocean biofuel solution. This contributed to a **13kt tCO_2e** reduction in our shipping emissions over the past financial year.

Climate risk management

We disclose on climate risk management via ABF's Group Task Force on Climate-related Financial Disclosures report. Additionally, we also contribute to the ABF Carbon Disclosure Project (CDP) submission.

Managing non-textile waste

We take a pragmatic approach to how we address our packaging formats and volume, prioritising solutions that can be implemented at scale and aligned with product protection and regulatory requirements. Some packaging formats, including those used for liquids, creams and moisture-sensitive products, remain necessary to support hygiene, usability and product integrity throughout the supply chain.

Clothes hangers continue to represent a significant proportion of our plastic packaging volumes. During 2026, we increased the recycled content in our plastic hangers, supporting our long-term ambition to transition to recycled alternatives where feasible. We also replaced plastic polybags with fibre-based cardboard formats across selected clothing ranges, working with nominated suppliers to support consistency and scalability.

Reducing our non-textile waste

95%[A] of waste produced in Primark's operations was diverted from landfill in 2025/26 (93% in 2024/25).

This progress reflects the success of our in-store non-textile recycling efforts and enhancements through our waste partner network. We continue to work with shopping centres that manage non-textile waste on our behalf to drive further improvements, while standardising waste management practices and educating colleagues on how retail and head office non-textile waste can be reused and recycled.



Promoting more regenerative agricultural practices

Cotton is the most used fibre in our clothes. Farming practices that support biodiversity, improve soil health and help farmers become more resilient are important in protecting our supply chain.

The Primark Cotton Project provides farmers, most of them women, with training on farming practices which use less water and fewer synthetic fertilisers and pesticides. These practices aim to improve soil health, increase crop yield and support the farmers' livelihoods. Since it began in 2013, the Primark Cotton Project has supported more than 300,000 farmers across India, Pakistan and Bangladesh.

A new standard for the Primark Cotton Project

This year, the Primark Cotton Project successfully transitioned to CottonConnect's REEL Regenerative Standard. This means strengthened independent verification that cotton farming and ginning are being undertaken in line with the good practices set out in the REEL Regenerative Standard.

For more information on the Primark Cotton Project, please see the case study in the ABF Responsibility website.

Planet continued

Water and chemicals management

Water

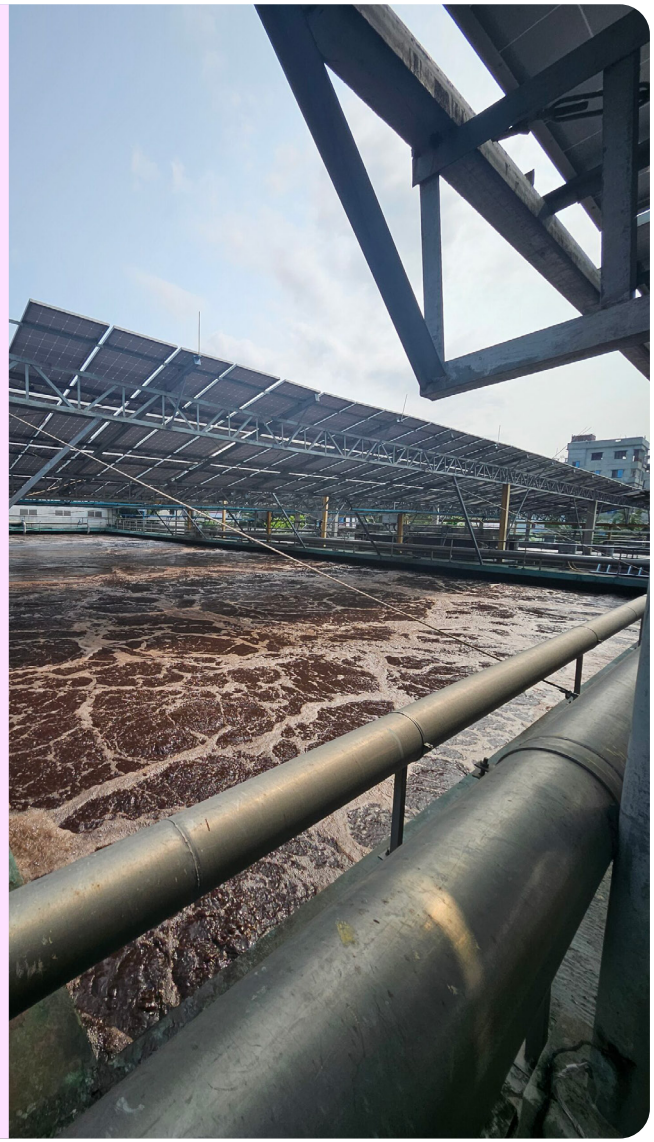
Water plays a vital role in making our clothes, from growing cotton to dyeing fabrics. We continue to work with suppliers and industry partners to reduce our water footprint; improve water management across our supply chain; and protect water resources in the communities where our clothes are made.

Our approach includes three focus areas for water management in our supply chain set out below:

Product based: We aim to reduce the water footprint of products sold in the UK by 30% by 2030, in line with our commitment to WRAP's UK Textiles Pact, covering the full product value chain. Since our 2019 baseline, we have achieved a **19%** reduction in the water footprint per tonne of textiles sold in the UK by 2025.

Site based: We work with suppliers to help support a reduction in their water footprint, improvement in water quality and increase in wastewater reuse. Through our newly introduced Supplier Environmental Standards framework, wet processing facilities are assessed on water management practices, existence of baselines, reduction targets and implementation plans. As of July 2026, **73%** of participating factories had established a 2030 water reduction target against a disclosed baseline from the past five years, and **80%** had a documented plan to achieve their reduction targets.

Basin level: We use tools such as WWF's Water Risk Filter and World Resources Institute aqueduct to identify water-stressed sourcing regions and support collective action to address shared water challenges. In 2026, we continued to collaborate with the Alliance for Water Stewardship (AWS) to strengthen water stewardship across our priority sourcing regions. In Bangladesh, 16 supplier sites completed the AWS Impact Accelerator Programme, which helps them to strengthen water governance and operational water management, engage local stakeholders and progress towards alignment with the AWS Standard.



Chemicals

We provide tools and guidance to help our suppliers manage chemicals responsibly, reduce the use of harmful substances and prevent pollution. Our Restricted Substance List (RSL) aligns with the AFIRM Group's RSL[1] and includes the ZDHC Manufacturing Restricted Substances List (ZDHC MRSL) as a minimum.

As part of our commitment to ZDHC, we carry out an annual assessment of our chemical management programme, evaluated by KPMG. Primark has achieved Champion Level, the highest award within the ZDHC Brands to Zero Programme, in recognition of our progress and leadership in this area.

In 2026, 247 wet processors completed at least Level 1 of the ZDHC Supplier to Zero programme, in part supported by Primark through Brand Implementation Support Vouchers[2]. We also funded InCheck Verification at 48 facilities to improve the accuracy, completeness and reliability of chemical inventory data.

1. The Apparel and Footwear International RSL Management (AFIRM) Group.
2. Brand Implementation Support Vouchers (BISVs) are tokens allocated to brands that can be provided to suppliers to subsidise or fund services related to ZDHC.

People

We have a longstanding commitment to support fair and safe conditions for people in our supply chain.



Impact metrics

- **Over 66,000 workers across 28 supplier factories in Bangladesh were screened. Of those, 25,000 have been given glasses and 9 out of 10 of those workers said during interviews that they were first-time wearers**
- **873 women farmers in the Primark Cotton Project accessed social welfare schemes in India**
- **1st impact evaluation of an external grievance mechanism conducted by a third party**

Our People commitments 2021-2026

- We will pursue a living wage for workers in the supply chain and support with financial literacy training and access to social protection by 2030
- We will strengthen the position of women through skills development and address barriers to progression by 2030
- We will ensure access to effective grievance processes and widen access to help for mental and physical wellbeing by 2030

1. The ACT Purchasing Practices were publicly launched in 2019 and the first survey by brands and suppliers took place in 2021, which measured uptake of responsible purchasing practices.

People continued

Creating financial resilience

We continue to pursue a living wage for workers in our supply chain through industry collaboration. As a member of ACT (Action, Collaboration, Transformation), we are focusing on improving transparency of our supplier wage data and embedding responsible purchasing practices across our business.

To date, **375 suppliers** and nearly **1,300 colleagues have now been trained on responsible purchasing practices to help us embed them across Primark**[1].

In May 2024, Primark signed an agreement with IndustriALL to support collective bargaining for garment workers in Cambodia. In October 2026, we signed a three-year extension to our agreement with IndustriALL, continuing our support. Under our ACT commitment, we continue to be an active industry player in raising awareness of the importance of responsible purchasing practices.

Promoting equal opportunities for women

The majority of workers in our supply chain are women, yet systemic challenges and deep-rooted beliefs about gender can limit opportunities for women to progress in their careers. Women working in the garment industry can also face gender-based violence and harassment (GBVH). We are working to address some of the underlying barriers that contribute to gender inequality. In addition, we have programmes which aim to support women to build greater resilience and opportunities.

During the year, we ran a pilot across 10 factories in Bangladesh aimed at supporting greater representation of women in management and career progression. We also worked with our partner Haqdarshak in India to support 873 women farmers in the Primark Cotton Project to successfully access social welfare schemes and strengthen their financial resilience.

See more on page 5.



Improving health and wellbeing

Maintaining health and safety standards in the factories that make our products is a priority for us, and it forms part of our Supplier Code of Conduct.

To reduce vulnerability across the supply chain, we run several programmes with some of our suppliers to widen access to help for workers' mental and physical wellbeing.

Supporting workers' eye health

We continued our partnership with Vision Spring to provide workers in some of our supplier factories with access to eye tests and glasses during the year. Between 2024 and 2026, while we supported this initiative, over **66,000** workers across 28 supplier factories in Bangladesh were screened. Of those, **25,000** have been given glasses and 9 out of 10 of those workers said during interviews that they were first-time wearers.

Assessing the impact of our social programmes

This year, we produced eight social impact reviews and research pieces to understand the impact of our worker engagement programmes across our supply chain.

This included our first impact evaluation of a third-party grievance mechanism, the Amader Kotha Helpline in Bangladesh. We looked beyond traditional indicators such as call volumes or case resolution rates to better understand how the Helpline functions and the real-world outcomes it delivers for workers.

We heard anonymously from 100 workers about their experience of the Helpline. The evaluation found strong evidence of positive impact, particularly in areas such as accessibility, worker trust and consistent follow-up. These learnings will shape the solutions we put in place in the future.

1. The ACT Purchasing Practices were publicly launched in 2019 and the first survey by brands and suppliers took place in 2021, which measured uptake of responsible purchasing practices.

Colleagues, Inclusion and Community Impact

Investing in our colleagues, protecting our culture and maintaining a highly engaged workforce are key strengths of our business. We also want to use our influence to be a force for good for our customers and within communities around the world.



Impact metrics

- 100+ partnerships globally supporting disabled people and others facing barriers to employment
- 17,000 colleagues have access to our digital learning platform
- £1.6m donated to charitable organisations and community partners this year

Colleagues, Inclusion and Community Impact continued

Colleagues

Listening and helping colleagues progress

Each year, we run an engagement survey to gather colleagues' feedback and other initiatives to encourage people to come forward with new ideas. Through the 2026 'Your Voice survey', we heard from over 49,000 colleagues.

This year, we continued to invest in leadership development, career pathways and accessible bite-sized learning. Our digital learning platform is now available to over 17,000 colleagues, with plans to extend access globally. Our internal careers site launched in August 2025 and rolled out across most markets between February and March 2026. It is helping colleagues explore opportunities and take the next step in their careers.

We continue to equip leaders to positively impact the people they lead, with 700+ colleagues between September 2025 and 2026 participating in a leadership development programme. Our 'Grow With Us' programmes support store colleagues to progress through retail management, with more than 170 participants promoted between June 2025 and September 2026. **As of September 2026, women held 46% of leadership roles overall.**

Supporting colleagues wellbeing

Our 'Let's Talk' Employee Assistance Programme (EAP) continues to offer practical and emotional support to our colleague. Over 2,000 colleagues were supported through our Let's Talk EAP in 2025. It's free and open to members of our colleagues' household.

This year, more than 200 colleagues were newly trained as Mental Health First Responders, while over 400 existing responders completed refresher training. They're helping us create an environment where conversations about mental health feel easier and colleagues know where they can seek help.



Colleagues, Inclusion and Community Impact continued

Inclusion

Accessible Primark

As a high street retailer, we have an important role in making fashion more accessible. We want our customers to enjoy choosing stylish and comfortable clothes in our stores without barriers to participation.

Our work on accessibility has been recognised. We feature in the Forbes Accessibility 100 and 200 lists, and we were named a Zero Project Awardee for innovations that support the implementation of the United Nations Convention on the Rights of Persons with Disabilities.

Our accessibility commitments and progress

These five commitments focus our efforts to make fashion more inclusive for people with health conditions and disabilities:

1. Accessible Products
2. Accessible Stores
3. Culture of Accessibility
4. Inclusive Representation
5. Accessible Communities

We have made progress in all five areas through the year.

Our adaptive clothing range now includes **49 styles**. We expanded the range in 2026, introducing new styles and colourways and new products such as adaptive swimwear and stoma underwear, which is a first for the British high street. We also improved designs based on customer feedback.

To make the shopping experience at Primark more accessible, we extended our sensory-friendly shopping hours beyond the Republic of Ireland into the 189 stores in Great Britain.

Since launching our commitments, we've worked even more closely with diverse talent across our campaigns and imagery to help more people feel represented and seen. We have also strengthened partnerships with employment organisations that support disabled people and those who may face barriers entering the labour market. Globally, we now have over **100** of these partnerships, ranging from large national programmes to smaller local initiatives.



Someone Like Me for Breast Cancer Now

Since 2024, Primark has funded Breast Cancer Now's 'Someone Like Me programme'. It connected people affected by breast cancer with a volunteer who understands their experience and can listen, answer questions and offer general support.

Through our funding, the charity has been able to recruit 125 new volunteers and arrange 4,739 matches. In total, this equates to providing 5,879 hours of support.



Community impact

It is important to us that we use outreach to support and strengthen the communities we're present in.

This year, we donated over £1.6m to charitable organisations and community partners, Additionally, we raised over **£2m** through customer fundraising campaigns.

For eight years, we have supported UNICEF, donating $16m (£12m) since 2018[1]. Our donations have contributed to UNICEF's vital work to respond to emergencies and help children around the world stay in school.

This year, we also donated €150,000 to support Children's Health Foundation Ireland.

1. As of July 2026.

About our reporting

This Sustainability and Ethics Progress Report was published in November 2026 and, unless otherwise indicated, the information and data recorded relates to the period from 1 August 2025 to 31 July 2026.

The below metrics have been independently assured by Ernst & Young (EY) against the International Federation of Accountants' International Standard on Assurance Engagements Other than Audits or Reviews of Historical Financial Information – known as ISAE 3000 (Revised). These assured metrics are highlighted in this report with the symbol Δ.

Basis of reporting information for some of the metrics listed below can be found here:

- Percentage of our clothing unit sales containing recycled or more sustainably sourced materials
- Percentage of our cotton clothes containing Primark preferred cotton sources
- Proportion of all clothing unit sales that are circular by design (%)
- Greenhouse gas emissions (tCO_2e)1 consisting of
  - Scope 1
  - Scope 2 (market-based)
  - Scope 3 emissions
- Scope 3 greenhouse gas emissions (tCO_2e)
- Percentage change carbon emissions across our value chain against Y2018/19 baseline
- Percentage of our own operations waste diverted from landfill
- Number of countries of operation
- Number of social audits conducted

As a division of ABF, we contribute to the ABF Annual Report.

We also contribute to the ABF Carbon Disclosure Project (CDP) and Task Force on Climate-related Financial Disclosures (TCFD) submission. Our GHG emissions reduction target has been assessed and validated by the SBTi, highlighting that our target is supported by the latest climate science criteria and recommendations.

Reporting methodology information for our carbon reporting can be found here.

In line with the UK Modern Slavery Act, we publish a Modern Slavery Statement annually. This sets out the measures we have taken during the past year to mitigate against the risks of modern day slavery and human trafficking in our supply chain or within our operations.

Our website also provides details of our approach and is updated to highlight any new initiatives. We also regularly report through partner and third-party benchmarks. More information on our reporting can be found here.



Independent Assurance Statement to Primark Limited

Scope

We have been engaged by Primark Limited ("Primark") to perform a 'limited assurance engagement,' as defined by International Standards on Assurance Engagements, hereafter referred to as the engagement, to report on selected non-financial indicators as listed below in Table 1 (the "Subject Matter") contained in Primark's Sustainability & Ethics Progress Report and , in the 'Code of Conduct Performance Statement' subsection of the 'Reports' section of Primark's corporate website (referred to as "the Primark Reports") for the year ended 31 July 2026 (or for the 52 weeks ended 12 September 2026 for metrics marked with an asterisk, or year ended 31 December 2025 for metrics marked with an ^ in Table 1).

The Subject Matter, as listed in Table 1, is also marked with a Δ symbol in the Primark Reports.

Table 1: List of selected non-financial indicators

Pillar	Indicator name
Product	• % of our clothing unit sales containing recycled or more sustainably sourced materials • % of our cotton clothes containing Primark preferred cotton sources • Proportion of all clothing unit sales that are circular by design (%)

Planet	• Greenhouse gas emissions (tCO_2e) consisting of:
	  • Scope 1
	  • Scope 2 market-based
	  • Scope 3
	• Scope 3 greenhouse gas emissions (tCO_2e)
	• % change in carbon emissions across our value chain against FY2018/19 baseline
	• % of our own operations waste diverted from landfill
	• Number of countries of operation*

People	• Number of social audits conducted^
	• Most frequent non-compliances identified^
	• Audit rating percentages^ consisting of:
	  • Grade 1: Good systems in place to support ethical compliance, limited number of minor issues (%)
	  • Grade 2: Evidence of some good systems in place, however, not achieved full Code of Conduct compliance (%)
	  • Grade 3: Code of Conduct compliance not met, with significant and numerous issues (%)

Other than as described in the preceding paragraph, which sets out the scope of our engagement, we did not perform assurance procedures on the remaining information included in the Primark Reports, and accordingly, we do not express a conclusion on this information.

Criteria applied by Primark

In preparing the Subject Matter, Primark applied the reporting criteria detailed in the 'About our Reporting' appendix of Primark's Microsite (the "Criteria").

Primark's responsibilities

Primark's management is responsible for selecting the Criteria, and for presenting the Subject Matter in accordance with those Criteria, in all material respects. This responsibility includes establishing and maintaining internal controls, maintaining adequate records and making estimates that are relevant to the preparation of the subject matter, such that it is free from material misstatement, whether due to fraud or error.

EY's responsibilities

Our responsibility is to express a conclusion on the presentation of the Subject Matter based on the evidence we have obtained.

We conducted our engagement in accordance with the International Standard for **Assurance Engagements Other Than Audits or Reviews of Historical Financial Information** ('ISAE 3000 (Revised)') and the International Standard for Assurance Engagements on Greenhouse Gas Statements ('ISAE 3410'), and the terms of reference for this engagement as agreed with Primark on 09 July 2026 and subsequently amended on 21 August 2026. Those standards require that we plan and perform our engagement to express a conclusion on whether we are aware of any material modifications that need to be made to the Subject Matter in order for it to be in accordance with the Criteria, and to issue a report. The nature, timing, and extent of the procedures selected depend on our judgement, including an assessment of the risk of material misstatement, whether due to fraud or error.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our limited assurance conclusion.

Our independence and quality management

We have maintained our independence and confirm that we have met the requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants, and have the required competencies and experience to conduct this assurance engagement.

EY also applies International Standard on Quality Management 1, **Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services engagements**, which requires that we design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Independent Assurance Statement to Primark Limited continued

Description of procedures performed

Procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. Our procedures were designed to obtain a limited level of assurance on which to base our conclusion and do not provide all the evidence that would be required to provide a reasonable level of assurance.

Although we considered the effectiveness of management's internal controls when determining the nature and extent of our procedures, our assurance engagement was not designed to provide assurance on internal controls. Our procedures did not include testing controls or performing procedures relating to checking aggregation or calculation of data within IT systems.

A limited assurance engagement consists of making enquiries, primarily of persons responsible for preparing the Subject Matter and related information, and applying analytical and other appropriate procedures.

Our procedures included:

- Engaging with selected members of Primark's leadership and senior management to discuss the governance structures around the preparation of the Subject Matter, and the progress made during the reporting year.
- Meeting with key data owners to understand the processes for recording, aggregating, calculating, and reporting the Subject Matter.
- Undertaking analytical procedures on the Subject Matter, to:
  - assess the accuracy, completeness and consistency with the established Criteria; and
  - make enquiries of management to obtain explanations for any significant differences we identified.
- Where necessary, testing, on a sample basis, underlying source information to check the accuracy of the Subject Matter.
- Recalculating computations performed by management to assess the accuracy of data aggregation for reporting purposes.
- For the audit rating percentages, on a sample basis, agreeing the reported audit grade back to management's records. We did not reperform any underlying audits to determine if the gradings applied were appropriate, nor did we perform any procedures to assess the appropriateness of management's judgement in determining the grading. Our work does not provide any assurance over the appropriateness of the gradings determined by management.

We also performed such other procedures as we considered necessary in the circumstances.

Conclusion

Based on our procedures and the evidence obtained, we are not aware of any material modifications that should be made to the Subject Matter for the year ended 31 July 2026 (or for the 52 weeks ended 12 September 2026 for metrics marked with an asterisk, or year ended 31 December 2025 for metrics marked with an ^ in Table 1), in order for it to be in accordance with the Criteria.

Use of our report

This report is produced in accordance with the terms of our engagement letter dated 09 July 2026, and subsequently amended on 21 August 2026, solely for the purpose of reporting to the directors of Primark in connection with the Subject Matter for the year ended 31 July 2026 (or for the 52 weeks ended 12 September 2026 for metrics marked with an asterisk, or year ended 31 December 2025 for metrics marked with an ^ in Table 1).

Those terms permit disclosure on Primark's website, solely for the purpose of Primark showing that it has obtained an independent assurance report in connection with the Subject Matter.

To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than Primark and Primark's directors as a body, for our work, for this report, or for the conclusions we have formed. This engagement is separate to, and distinct from, our appointment as the auditor to Primark.

Ernst & Young
25 November 2026

Dublin, Ireland

Glossary

Biofuel	Biofuel is a fossil fuel alternative. The biofuel utilised by Maersk is manufactured from used cooking oil, recycled biomass and other waste streams that can't be used elsewhere. Read more here: Maersk Partnership - Biofuel
Circularity	For Primark, circularity means working towards a system where clothing is kept in use for longer and textiles are used again, reducing textile waste and reliance on virgin resources. Primark's approach is informed by the Ellen MacArthur Foundation's 'vision of a circular economy for fashion', in which products are 'used more, made to be made again, and made from safe and recycled or renewable inputs'
Circular Product Standard (CPS)	Primark's CPS sets out the criteria products must meet to be considered circular by design, including requirements relating to materials, durability and recyclability. Read more here: Primark Circular Product Standard 2.0
Collective Bargaining Agreement (CBA)	A written agreement between employers and workers, or their representatives, that sets out agreed pay, working conditions and other terms of employment
Forced labour	Primark aligns with the International Labour Organization's (ILO's) definition of forced labour: "Work or service exacted from a person under threat or penalty, which includes penal sanctions and the loss of rights and privileges, where the person has not offered him/herself voluntarily."
Freedom of Association	Freedom of Association is defined by ILO as "the fundamental right of workers and employers to freely form and join organizations of their own choosing to promote and defend their work interests
GBVH	Gender-based violence and harassment
GHG emissions	Emissions of the seven covered by the Kyoto Protocol: carbon dioxide (CO_2), methane (CH4), nitrous oxide (N2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulphur hexafluoride (SF6) and nitrogen trifluoride (NF3)
GHG Emissions (Scope 1)	Direct GHG emissions from owned or controlled sources. For example, the use of non-renewable fuels such as natural gas in boilers, as well as fugitive emissions
GHG Emissions (Scope 2)	Indirect GHG emissions associated with the purchase of electricity, steam, or cooling
GHG Emissions (Scope 3)	GHG emissions which are the result of activities from assets not owned or controlled by Primark, but that Primark indirectly impacts in our value chain The following categories of the GHG Protocol Corporate Value Chain (Scope 3) Standard are included: Upstream emissions • Category 1: Purchased goods and services • Category 2: Capital goods • Category 3: Fuel and energy-related activities • Category 4: Upstream transportation and distribution. • Category 5: Waste generated in operations • Category 6: Business travel Downstream emissions • Category 7: Employee Commuting • Category 9: Downstream transportation • Category 11: Use of sold products • Category 12: End-of-life treatment of sold products • Category 13: Downstream leased assets • Category 14: Franchises

Glossary continued

Greenhouse Gases (GHGs)	The atmospheric gases responsible for causing global warming and climate change. The major GHGs are carbon dioxide (CO_2), methane (CH4) and nitrous oxide (N2O). Less prevalent but powerful greenhouse gases are hydrofluorocarbons (HFCs), perfluorocarbons (PFCs) and sulphur hexafluoride (SF6)
Grievance mechanism	A grievance mechanism is a formal process that allows individuals or groups to raise complaints and seek remedies for issues related to business activities, human rights violations, or workplace concerns
Human Rights Due Diligence (HRDD)	Human rights due diligence is an approach that allows companies to proactively address their human rights risks and impacts through risk assessment, monitoring, mitigation and remediation actions
Living wage	As per the 2024 ILO Living Wage principals 2024 is calculated as "the wage level that is necessary to afford a decent standard of living for workers and their families, taking into account the country circumstances and calculated for the work performed during the normal hours of work". For specific Living Wage benchmarks, we use the Anker Research Institute reference values
Location-based emissions	Location-based emissions are calculated using the average emission intensity of the local grid where the electricity is sourced. This method does not account for any green measures, such as renewable energy credits (RECs), and is the same regardless of whether RECs are used or not
Market-based emissions	Market-based emissions refer to the calculation of greenhouse gas emissions based on the energy a company purchases, allowing for the inclusion of renewable energy credits and contracts
RE100	The RE100 initiative is a global corporate renewable energy initiative bringing together numerous large and ambitious companies that have committed to using 100% renewable power
Responsible Purchasing Practices	Primark aligns with the definition of responsible purchasing practices from ACT "the business behaviors, values, and operational methods of global retailers and brands that actively enable and facilitate the payment of a living wage to workers in the garment, textile, and footwear supply chain"
SBTi	The Science Based Targets initiative (SBTi) defines and promotes best practice in emissions reductions and net-zero targets in line with climate science. It also provides companies with independent assessment and validation of targets
Single-use plastics (SUP)	Single-use plastics are products or packaging which are used once, or for a short period of time, before being thrown away
Supplier Code of Conduct	Our Supplier Code of Conduct which sets out the standards we expect of our suppliers and partners
TCFD	The Task Force on Climate-related Financial Disclosures. Created by the Financial Stability Board, the TCFD was developed to provide recommendations on the types of information that companies should disclose to support investors, lenders, and insurance underwriters in appropriately assessing and pricing a specific set of risks-related to climate change. Upon delivery of the TCFD's 2023 Status Report, and on request of the Financial Stability Board, the TCFD has now been disbanded
Textile-to-textile recycling	Textile-to-textile recycling involves transforming used textiles into new fibres for fabrics, creating a closed-loop system for sustainable textile production
Tier one factory	Factories manufacturing finished goods for Primark
UK Textiles Pact	The UK Textiles Pact is a collaborative initiative aimed at transforming the fashion and textiles industry towards more sustainable and circular practices by 2030
Wet processing	Wet processing refers to a series of chemical and mechanical treatments in textile manufacturing that utilize water or other liquids to alter the properties of textile materials
ZDHC Manufacturing Restricted Substances List. (ZDHC MRSL)	The ZDHC MRSL offers brands and suppliers a single, harmonised list of chemical substances banned from intentional use during manufacturing and related processes in supply chains of the textile, apparel, and footwear (including leather, rubber, foam and adhesives) industries

PRIMARK

Sustainability and Ethics Progress Report 2025/26