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# PRIMARK SUBMISSION



# Clean Clothes Campaign Wage Survey

Response ID:120; Data

## 1. Login/Password Action

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## 2. Introduction

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### 1. Company name:

PRIMARK

### 2. Brands owned by company:

### 3. Main contact person:

Name: : Libby Annat

Email: : lannat@primark.co.uk

Contact phone number: : +44 (0)118 9606 300

## 3. The living wage standard

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### 4. 1.1 What is your company's position on payment of the living wage to workers in your supply chain?

The issue of wages continues to be priority area for Primark. Our Code of Conduct, based upon the ETI Base Code, states "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". We subscribe to and require our suppliers to abide by this definition for all workers in our supply chain including piece-rate, sub-contractor, informal, and homeworkers. We agree with the principle that a living wage should cover basic needs, provide for discretionary income and savings, and cater for dependents. We acknowledge the inherent challenges in defining and calculating a living wage figure and have concluded that the negotiated approach remains the most practical and sustainable, and therefore support the development of mature industrial relations in achieving this.

### 5. 1.2 Please give the link to the code of conduct which is used when monitoring conditions in your supplier factories. If it isn't publicly available, please upload a copy using the option below.

[://www.primark-ethicaltrading.co.uk/how\\_we\\_work/our\\_code\\_of\\_conduct](http://www.primark-ethicaltrading.co.uk/how_we_work/our_code_of_conduct)

### Upload option.

### 6. 1.3 Does your company agree with the definition of a living wage as given here?

No, our definition differs from the definition given.

### If no, please provide details of how your definition of a living wage is different and give justification.

Our Code of Conduct is based upon the ETI Base Code. It states "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”.

#### 4. Respect for freedom of association and collective bargaining, a precondition for a living wage

##### **7. 2.1 How has the right to Freedom of Association and Collective Bargaining been clearly communicated to workers in your supplier factories and subcontractors?**

All production sites manufacturing for Primark including first and second tier receive the Code of Conduct part of our terms of trade, and prior to each audit. Suppliers are required to display this in the relevant local language. The code is based upon the ETI Base Code, and outlines the rights that workers can expect in their workplace.

We recognise the challenge that workers may face in relying on the Code of Conduct to understand their rights. To address this we worked with workers and local NGOs in Bangladesh, China, and India to create a series of posters that were easy to understand, highly visual, used workers' own language and experiences, and were relevant to local culture and context. The posters were created using a participatory and peer-led approach. Groups of workers created the content and messaging for the posters, supported by local NGOs and designers. We consulted with stakeholders including ILO Better Work and the ETI which both had experience of developing worker-focused materials. The posters are currently being rolled out through our local ethical trade teams and auditing partners and feedback from workers and suppliers has been excellent.

Percentage of supplier factories and subcontractors reached by these measures:

Code of Conduct – 100%

Worker rights posters:

Bangladesh: 89%

India: 11%

China: 26%

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##### **Percentage of supplier factories and subcontractors reached by these measures:**

100%

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##### **Please supply an example of materials used:**

[South India poster ENG.jpg](#)

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##### **8. 2.2 Do you support or facilitate training for workers to ensure they are aware of their right to freely associate, in conjunction with local independent trade unions or workers' rights organisations? Please supply details:**

We have several pilots that incorporate training for workers on FOA. See Section 6 Living Wage pilot programmes.

In addition, our programme in South India has been running since 2009. It provides education to workers in communities where our products are made. Note that this programme is NOT factory-based, and is open to all workers both those that work within Primark factories and those that work at non-Primark factories. Topics include workplace rights, labour laws, trade unions, and FOA. Training is delivered in small groups (clusters), which enables deep learning and discussion. Materials have been developed to support the programme, and are shared widely with the local community. A helpline to answer any queries is available for all workers within the community. Where queries are received, the NGO works with the local trade unions to resolve these issues. A consortium of cluster leaders meets with trade unions annually to discuss key issues.

Through this programme we also conduct surveys on factory wages and living wages using a basket-approach.

Note that this programme is NOT factory-based, and is open to all workers both those that work within Primark factories and those that work at non-Primark factories. The programme to date has provided education for over 3000 workers.

Names of local unions or workers rights organisations: : SAVE

Percentage of supplier factories reached by these measures: : Note that this programme is NOT factory-based, and is open to all workers both those that work within Primark factories and those that work at non-Primark factories. The programme to date has provided education for over 3000 workers.

**9. 2.3 Do you provide training for management of your supplier factories and subcontractors on the right to freedom of association?**

We have several pilots that incorporate training for management on FOA. See Section 6 Living Wage pilot programmes.

**Percentage of supplier factories and subcontractors reached by these measures:**

1%

**10. 2.4 Have your supplier factories and subcontractors issued the Right to Organise Guarantee to workers in any of your production units?**

	Country:	Number of suppliers:	Details:
1:			
2:			
3:			
4:			

**Please provide a sample of materials used in specific countries:**

**11. 2.5 Do you require supplier factories and subcontractors to sign Union Access Agreements? If yes, please supply details.**

**Number of supplier factories with agreements:**

**Please provide a sample of agreements signed:**

**12. 2.6 Does your company have an accessible, actionable and safe means by which workers can file and follow up on complaints about violations of freedom of association and collective bargaining rights? How do you monitor that this can be accessed freely by workers?:**

We are developing worker hotlines in North India and Bangladesh with the intention that similar systems would be available in other major sourcing countries over time. Whilst we acknowledge that hotlines are not a substitute for effective grievance mechanisms or mature industrial relations, we are aware that the development of worker management relations will take time. In the shorter term and, on an on-going basis, we aim to provide a hotline facility where the workforce may safely and effectively report grievances. We are testing two approaches, one within the community, and one within factories. Both are being developed with the input of local stakeholders.

North India: In 2013 we will pilot a community-based hotline in North India. The hotline facility will be placed in the community. The first phase of this project will take place in the last quarter of 2013.

Bangladesh: We are developing a factory-based hotline. The first phase of this project will take place in the first quarter of 2014.

South India: We have a community based hotline managed by SAVE and supported by an education programme. See section 2b.

How do you monitor that this can be accessed freely by workers?

South India / North India: Both programmes are community-based and therefore can be accessed freely by all workers and those in the community.

Bangladesh: appropriate measures are being identified and implemented through local stakeholders as part of the programme scope of work.

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### **13. 2.7 Have you done any work to limit the use of short term contracts in your supplier factories and subcontractors?**

Please provide details of your policy and its impacts in relevant countries: : na

How has any of this work impacted on workers ability to receive seniority bonuses?: : na

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### **14. 2.8 Is there anything else you would like to tell us about work you have done so far, or work you are planning, to promote the right to freedom of association in your supply chain?**

We fully recognize the importance of FOA as an enabling right for workers to achieve a living wage. We also recognize that it is vital that we – as a global retailer sourcing from a wide international base - fully understand the complexities of freedom of association, the spectrum of approaches, the legal contexts underpinning it, and how it can be embedded with our programmes to support workers in achieving a living wage and FOA.

- We commissioned research on FOA for ten of our key sourcing countries. Our aim was to understand the landscape of FOA within our sourcing countries so that we could make informed decisions about existing and future activities in these regions. The profiles included information on the legal framework; industrial relations in general and in the garment sector; main stakeholders including national and international trade unions, employers' organisations, NGOs and civil society groups; international organisations and donors; and examples of initiatives on FOA and collective bargaining.

- We want to better understand how factories are really performing in relation to FOA, and what 'good' looks like - accepting there will be cultural and legal differences in each country and that "FOA is a process, rather than an outcome". For underperforming suppliers, we want to understand how we could support them to move towards 'good' in a sustainable way; and what our role as retailers should be. We have consulted with external stakeholders including TUC, ITGLWF, ILO, audit companies, and other experts to see if guidance on indicators, and continuous improvement 'roadmaps' existed. This research indicated that there was a need for guidance and more effective indicators to be developed for retailers, and we are working on this with stakeholders through 2013.

We anticipate that these two pieces of work will ensure we understand the landscape of FOA, and how we can measure and improve FOA within our supply base, and will provide a good foundation moving forward.

If listing future plans, please provide a timescale for activities.

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## **5. Dialogue and negotiation with labour rights organisations**

### **15. 3.1 Please provide details of any active collaborative work undertaken with independent trade unions or labour rights organisations in your sourcing countries:**

We have worked with the IndustriALL and the IndustriALL Bangladesh Council on short-term relief and long-term compensation for victims of Rana Plaza.

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### **16. 3.2 Have any of your collaborations resulted in unions or bargaining processes starting within your supplier factories?**

no

## 6. 4. Benchmarks for a minimum living wage

### 17. 4.1 Does your company have internal figures that it uses to benchmark living wages for each sourcing country or region?

No

### If yes, please provide details of how these were developed and how they are used:

na

### 18. 4.2 Please provide information about the figures you are using to benchmark a living wage in your 3 main production countries or regions.

	Country/region	Living wage benchmark
1.		
2.		
3.		

### 19. 4.3 Please give details of the number of your supplier factories in Asia that are currently paying the [Asia Floor Wage](#).

	Country/region	Number of supplier factories paying Asia Floor Wage
1.		
2.		
3.		
4.		
5.		

## 7. Purchasing practices that make living wages possible

### 20. 5.1 Is your company doing work to limit the use of subcontractors in your supply chain and/or consolidate your supplier factory list? Please provide details:

Yes. We are currently focused on consolidating our supply base with the aim of strengthening relationships with existing strategic suppliers and developing strong relationships with those newer suppliers who demonstrate an ability to efficiently grow their business whilst proactively engaging on key performance issues, including ethical trade issues. We are, in an appropriate manner, disengaging with those suppliers who have repeatedly failed to show commitment and willingness to deal with key issues found in their production sites.

As part of this approach, in 2011-12, the ethical trading team in consultation with sourcing, and the CEO and COO of Primark developed a policy and process to ensure better transparency around sub-contracted sites. This was done after consultation with brands and other stakeholders on policy and minimum standards for sub-contracted / lower tiers of the supply chain, and on appropriate and effective systems of monitoring.

The policy clearly distinguishes Tier 1 factories which provide cut-manufacture-trim (CMT) processes from Tier 2 factories which can include ancillary services, sundry, and component suppliers. Under the policy suppliers are prohibited from placing Primark production in unapproved and therefore unauthorised CMT units. This was already captured within our terms of trade, but is now framed in more detail and clarity, and provides for a more substantive framework on how to address the risk of sub-contracting. Our objective is to encourage transparency, discourage the use of sub-contracting units, and support our suppliers in having a more effective

supply chain by managing risk better.

The policy was launched through a series of supplier road-shows in 2012, and we recruited specialist roles within our India and Bangladesh ethical trade teams to focus upon its implementation.

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**21. 5.2 Does your company operate a policy of buyers favouring supplier factories that consistently meet a high wage standard? How?**

Yes. Our factory rating system enables buyers to continuously assess suppliers' performance in relation to all aspects of our Code of Conduct including wages, and to move production towards those suppliers demonstrating improved and sustained ethical performance. Consequently, buyers disengage with those suppliers failing to proactively engage over time on ethical trade issues, including wages. (Also see Consolidation of Supply Chain above).

Buyers currently receive rating reports on a monthly basis, and high risk alerts which flag up critical issues as soon as they occur. Buyers work closely with the ethical and sourcing teams to address these issues. When visiting factories, buyers receive tailored visit reports that cover any outstanding non-compliances, the number of workers, site capacity etc. These reports are used by the buyers to discuss factory status and improvement plans. Buyers, and their directors, meet with the ethical trade and sourcing teams once every six months to review the departments overall list of sites and their performance.

To support buyers further on this, we are developing scorecards produced in conjunction with our sourcing department and commercial teams. The system focuses on five key indicators: Capacity; Quality; Ethical compliance; Design; Delivery. The system is being rolled out through a phased approach through 2012 and 2013 beginning with the top 100 suppliers.

This responsibility is reflected in buyers' job descriptions and performance.

- Job descriptions refer explicitly to ethical trade and buyers are expected to ensure their suppliers meet the code of conduct.
- Buyers are validated on their awareness of ethical trading. The objectives of the validation are set by Human Resources and Katharine Kirk. The buyer validation is an online module within the performance appraisal system.

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**22.**

Are other incentives provided for buyers or supplier factories to work towards a living wage for workers? : This responsibility is reflected in buyers' job descriptions and performance.

How is this monitored? : Where buyers do not meet the required validation score after two attempts, this is referred to their line manager and discussed as part of their Performance Management. We support buyers in achieving these goals through a programme of in-depth training, consultation on key issues and policies, and regular communication.

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**23. 5.3 Does your company break down and calculate whether FOB prices per piece are sufficient to allow for compliance with the wage standard your company has set out in its code of conduct?**

Open costings with suppliers are becoming standard practice within our business. We have developed cost models for all product types which provide clarity on a factories costs, including labour and overhead costs as well as gross and net margins. In this way we have visibility of the payment of fair wages to factory workers at all production sites. These costing models are continuously reviewed and made available to both buyers and suppliers to ensure they accurately inform all buying decisions.

It is also acknowledged that it is vitally important that retailers' terms of trade do not make it difficult for factories to pay their workers. Primark pays its suppliers within thirty days, and is one of the few retailers to do so.

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**24. 5.4 Does your company operate a policy of buyers favouring supplier factories that support the establishment and functioning of genuine trade unions, and those with collective bargaining agreements?**

Yes. Our factory rating system enables buyers to continuously assess suppliers' performance in relation to all aspects of our Code of Conduct including FOA, and to move production towards those suppliers demonstrating improved and sustained ethical performance. Consequently, buyers disengage with those suppliers failing to proactively engage over time on ethical trade issues, including wages. (Also see Consolidation of Supply Chain above).

Buyers currently receive rating reports on a monthly basis, and high risk alerts which flag up critical issues as soon as they occur. Buyers work closely with the ethical and sourcing teams to address these issues. When visiting factories, buyers receive tailored visit reports that cover any outstanding non-compliances, the number of workers, site capacity etc. These reports are used by the buyers to discuss factory status and improvement plans. Buyers, and their directors, meet with the ethical trade and sourcing teams once every six months to review the departments overall list of sites and their performance. Please also refer to our work on understanding how we can better identify and support effective FOA within the workplace through our monitoring programme (see section 2).

To support buyers further on this, we are developing scorecards produced in conjunction with our sourcing department and commercial teams. The system focuses on five key indicators: Capacity; Quality; Ethical compliance; Design; Delivery. The system is being rolled out through a phased approach through 2012 and 2013 beginning with the top 100 suppliers.

This responsibility is reflected in buyers' job descriptions and performance.

- Job descriptions refer explicitly to ethical trade and buyers are expected to ensure their suppliers meet the code of conduct.
- Buyers are validated on their awareness of ethical trading. The objectives of the validation are set by Human Resources and Katharine Kirk. The buyer validation is an online module within the performance appraisal system.

Where buyers do not meet the required validation score after two attempts, this is referred to their line manager and discussed as part of their Performance Management. We support buyers in achieving these goals through a programme of in-depth training, consultation on key issues and policies, and regular communication.

**25. 5.5 Please provide information about any other work your company has done / is planning to do on improving your purchasing practices, in relation to wages.**

We are currently focused on more effectively sourcing across different categories for men's, women's and children's' wear on all our core product lines. We are consolidating buying for these key lines via a strategic group of suppliers in line with their capacity and placing orders within a short, specific timeframe. This is enabling these suppliers to forward plan their production, make cost effective forward purchases of fabric in significant volumes and, in turn, guarantee their workforce's stability including payment of wages.

**8. Living wage projects**

**26. Please provide details of any projects here. Please note you can cut and paste long pieces of text into these small boxes if necessary:**

	Project 1	Project 2	Project 3	Project 4
Location:	Bangladesh	China		
Number of factories and workers involved:	3 factories -3652 workers	4 factories - 1240 workers		
Living wage benchmark				



used:				
Partnerships:	GIZ, BKMEA (productivity cell), Bangladesh Institute of Management, SEBA	Infact Global Partners, Timeline		
Wage increase achieved:	These varied from factory to factory. Key impacts were seen at factories where workers continued to negotiate after the pilot had finished, for example, at one factory workers negotiated increases in piece rates on three separate occasions through the skills and training they had received in the pilot. Similarly, another factory initiated a new bonus scheme whereby 1% of profit was distributed to the entire workforce, supported by effective performance appraisal training.	These varied from factory to factory. Key impacts were seen at factories where workers continued to negotiate after the pilot had finished, for example, at one factory workers negotiated increases in piece rates on three separate occasions through the skills and training they had received in the pilot. Similarly, another factory initiated a new bonus scheme whereby 1% of profit was distributed to the entire workforce, supported by effective performance appraisal training.		
Details of process:	Both pilots consisted of worker needs assessments; and training and support on productivity enhancements, human resources, compliance, worker-management dialogue and negotiation, and workplace resolution. These programmes have shown that building and supporting mature industrial relations can have an impact upon wages and working conditions, as part of a multi-faceted strategy on living wages that looks both at internal and external systems.	Both pilots consisted of worker needs assessments; and training and support on productivity enhancements, human resources, compliance, worker-management dialogue and negotiation, and workplace resolution. These programmes have shown that building and supporting mature industrial relations can have an impact upon wages and working conditions, as part of a multi-faceted strategy on living wages that looks both at internal and external systems.		

**27. Please upload any useful supporting documentation here:**

**9. New Page**

**28. 7.1 Have you publicly supported calls from civil society and unions to increase the minimum wage to a living wage standard in your production countries? Have you made this position clear towards governments and employers associations?**

na

**29. 7.2 As part of this work, have you issued a public statement assuring country governments that you will not relocate production as a result of minimum wage legislation that ensures a living wage?**

na

**10. Transparency**

**30. 8.1 Does your company publish a full public list of supplier factories, and sub contractors, their locations and products?**

Currently, we have no plans to publish our supplier list for commercial reasons. We have supplied a list of

factories we source from in Bangladesh to the Accord as part of our responsibilities as an Accord signatory member.

**Do you have plans to publish a full list in the future?**

**31. 8.2 Does your company publish impact reports on projects related to wages?**

We report on this through our annual submission to the ETI.

**11. Collaborative working**

**32. 9.1 Please provide details of your involvement with any multi-stakeholder initiative projects working to improve wages:**

ETI Living Wages group: this group is newly formed.

**33. 9.2 Please provide details of any work you have initiated outside an MSI, directly with other companies which has improved wages:**

**34. Supporting documents:**

**12. 10. A clear route map for implementing a living wage for all workers**

**35. 10.1 Has your company developed a strategy for delivering a living wage in your supply chain? Is this a public commitment?**

Na

**36. 10.2 Does this strategy have a time scale? If yes, please state.**

**37. 10.3 What consultation have you carried out on this strategy, both within and outside your company?**

**38. 10.4 How will you ensure that vulnerable workers, such as homeworkers or migrant workers are also included in efforts to increase wages?**

**39. 10.5 Is there anything else you would like to tell us about your work on the living wage that hasn't been covered in this survey?**

**13. Further questions about your supply base**

**40. 1. What are your main production countries? Please state percentage of total production per country and the number of supplier factories.**

	Country	Percentage of production	Number of suppliers
1	na	na	na
2			
3			
4			
5			

6			
7			
8			
9			
10			

**41. 2. What kind of trade partners are part of the sourcing structure? Please indicate an approximate % of volume share of your production:**

Production at factories owned by your company: : %na  
 Orders placed directly to supplier factories: : %na  
 Orders placed through agencies or intermediates: : %na  
 Other: : %na

**42. If other, please specify.**

**43. 3. What is the length of time that you have been working with your current suppliers?**

	% of suppliers
More than 5 years:	na
2-5 years:	na
Less than 2 years:	na

**44. 4. How many sites did you use to produce your goods in 2012?**

First tier suppliers: : na

**45. 5. How many supplier factories do you trade with where you have a regular production share of more than 25%?**

Number of suppliers: : na  
 Please list suppliers, country and % of product share at the factory: : na

**Response Location**

<b>Country:</b>	United Kingdom
<b>Region:</b>	Q4
<b>City:</b>	Redditch
<b>Postal Code:</b>	
<b>Long &amp; Lat:</b>	Lat: 52.299999, Long:-1.9333

## Profile: Primark

Brands: Primark, Atmosphere, Cedar Wood State, B&W, Denim Co., Love to Lounge, Young Dimension, No Secret, Ocean Club, Secret Possessions.

### Company position on the living wage:

"We agree with the principle that a living wage should cover basic needs, provide for discretionary income and savings, and cater for dependants. We acknowledge the inherent challenges in defining and calculating a living wage figure and have concluded that the negotiated approach remains the most practical and sustainable, and therefore support the development of mature industrial relations in achieving this."

Primark is developing a holistic strategy to look at wages, with country-specific approaches. The strategy builds upon our pilot programmes and research conducted over the past two years, and will focus on key areas including, but not limited to, worker empowerment, factory improvements, stakeholder engagement and benchmarking supplier performance.

### What we say:


Primark's submission shows some proof of real work that will improve wages for workers making their clothes and a high level of commitment and practice. However at a strategy level projects are still at pilot or research stage and rely heavily on ETI base code rather than long term building blocks to pay a living wage.

### In more detail:

**Has living wage benchmarks?** No.

### Worker empowerment:

**Primark say:** We fully recognize the importance of FOA as an enabling right for workers to achieve a living wage, and have included this as a key aspect in our strategy. This builds upon our work to date to fully understand the complexities of freedom of association, the spectrum of approaches, the legal contexts underpinning it, and the roles and responsibilities of stakeholders including Primark as a responsible retailer. ~~"We fully recognize the importance of freedom of association (FOA) as an enabling right for workers to achieve a living wage. We also recognize that it is vital that we — as a global retailer sourcing from a wide international base — fully understand the complexities of FOA, the spectrum of approaches, the legal contexts underpinning it, and how it can be embedded with our programmes to support workers in achieving a living wage and FOA."~~ In order to do this, Primark have commissioned research into what good practice on FOA looks like, "in consultation with TUC, ITGLWF, ILO, audit companies, and other experts", and hope to use this to set standards.

Primark say they "have several pilots that incorporate training for workers on FOA". They have been running a programme in South India since 2009 which provides education to workers on "workplace rights, labour laws, trade unions, and FOA." This has been delivered in non-factory discussion group settings in association with the NGO SAVE and local unions 

Primark are developing hotlines in North India and Bangladesh to act as grievance mechanisms. A hotline in South India is already in place.

### Commitment and practices:

Primark say: "Our current focus is consolidating our supply base with the aim of strengthening relationships with existing strategic suppliers and developing strong relationships with those newer suppliers who demonstrate an ability to efficiently grow their business whilst pro-actively engaging on key performance issues, including ethical trade issues."

Primark have a 'factory ranking system that "enables buyers to continuously assess suppliers' performance in relation to all aspects of our Code of Conduct including wages, and to move production towards those suppliers demonstrating improved and sustained ethical performance."

They are also developing a scorecard system to further aid buyers.

Primark state that “Open costings with suppliers are becoming standard practice within our business. We have developed cost models for all product types which provide clarity on a factory's costs, including labour and overhead costs...In this way we have visibility of the payment of fair wages to factory workers at all production sites.”

### **Collaborative approach:**

Primark are members of the ETI, and are taking part in work with other ETI [corporate](#) companies on living wages. Primark has worked with IndustriALL and the IndustriALL Bangladesh Council on short-term relief and long-term compensation for the victims of Rana Plaza – although this is not wage related work.

### **Strategy:**

Primark is working on pilot projects in 7 factories in Bangladesh and China, in collaboration with various consultants, government bodies and manufacturers associations. Projects focused on “worker needs assessments, training and support on productivity enhancements, human resources, compliance, worker-management dialogue and negotiation, and workplace resolution.” Results in terms of actual wage increases ~~were not given~~ varied from factory to factor. Key impacts were seen at factories where workers continued to negotiate after the pilot had finished. Primark said: “at one factory workers negotiated increases in piece rates on three separate occasions through the skills and training they had received in the pilot. Similarly, another factory initiated a new bonus scheme whereby 1% of profit was distributed to the entire workforce.”

Primark gave no long term strategy for ensuring that a living wage is paid to workers making their clothes.

### **Production overview:**

Number of suppliers: Primark refused to give this information

Main production countries listed: Primark refused to give this information

Primark refuses to publish a public list of where its supplier factories are based.

### **Comments:**

Primark is a member of ETI with the commitment to a living wage written in their code of conduct, yet they still have yet to define what this means in terms of real wage figures and check if this is being paid to the workers making their clothes. For a company that has a lot to prove when it says that it is not exploiting its workers by selling things so cheap, more needs to be done.

Primark say their approach to paying a living wage is to support 'the negotiated approach' by which they mean that they support unions to negotiate better wages. However, there was little evidence of work with or in consultation with local unions given, and little of work with international unions outside of Bangladesh disasters. Their research into developing a standard of good practice on FOA sounds good, but without a solid plan or timescale for putting this in place, we will wait to hear more.

Primark say that, because there are 'inherent challenges' in calculating a living wage figure, they have chosen instead to adopt a negotiated approach. For us, it is not an Either Or situation, but a Both And. There is a pressing need to define a goal in any commitment, because without putting a real figure on any commitment, how will you know if you have achieved it? A living wage commitment can only be an effective performance indicator if it is measurable. The negotiated approach is the 'how' of deliver a living wage, and the definition of the figure is the 'what'. Without either of these the commitment is meaningless. We hope that Primark will consider this and work towards adopting a living wage benchmark – the Asia Floor Wage springs to mind. Primark indicated some work on starting 'open costings' with suppliers. This is a step in the right direction. Transparency about the labour cost of each product will lay the ground for work to cost in a living wage figure into pricing.

Primark also lack a strategy for delivering a living wage. The various pilot projects given have no data about real wage improvements, and no indication of plans to use the learning gained in other parts of the supply chain – disappointing. We hope that Primark will start to put a strategy in place.

**For clarification:** Find out what the ETI living wage working group is as Julia says there isn't one. More info on SAVE project - local Union? Pilot project outcomes – figures for wage increases?

# We are proud of our factory



We want to work in your factory.

You need to meet the HR with relevant documents



Okay, you can submit photocopies of your certificates and jobs from tomorrow. Your sister does not meet the age requirement so we cannot employ her.

We have to come to factory on time and we leave on time.



Use personal protective equipments like mask, gloves, mat etc during work.



Since when are you all working at this place.

I am working for last 4yrs.

I have been working here for the past 6 years.

Wow! This toilet is so clean.



The dining hall is really good.



What is this poster about?

This is about the need for people to respect and treat each other well.



I did not get my PF. No.

Till now I haven't received my ESI card.

Did you not receive your wage slip? All details would be mentioned in that.

We will take this matter to management.



We will check why there is a delay and will do the needful.

If you could address these issues it would be good for us.



6

Every Saturday we get our weekly wages.



I am able to save some money for myself.

I get enough time to spend with my family and take care of their needs.

I am able to support my sister's education.