



BRAND PERFORMANCE CHECK

LaDress B.V.

PUBLICATION DATE: JULY 2015

this report covers the evaluation period 01-01-2014 to 31-12-2014

ABOUT THE BRAND PERFORMANCE CHECK

Fair Wear Foundation believes that improving conditions for apparel factory workers requires change at many levels. Traditional efforts to improve conditions focus primarily on the factory. FWF, however, believes that the management decisions of clothing brands have an enormous influence for good or ill on factory conditions.

FWF's Brand Performance Check is a tool to evaluate and report on the activities of FWF's affiliate members. The Checks examine how affiliate management systems support FWF's Code of Labour Practices. They evaluate the parts of affiliate supply chains where clothing is assembled. This is the most labour intensive part of garment supply chains, and where brands can have the most influence over working conditions.

In most apparel supply chains, clothing brands do not own factories, and most factories work for many different brands. This means that in most cases FWF affiliates have influence, but not direct control, over working conditions. As a result, the Brand Performance Checks focus primarily on verifying the efforts of affiliates. Outcomes at the factory level are assessed via audits and complaint reports, however the complexity of the supply chains means that even the best efforts of FWF affiliates cannot guarantee results.

Even if outcomes at the factory level cannot be guaranteed, the importance of good management practices by affiliates cannot be understated. Even one concerned customer at a factory can have significant positive impacts on a range of issues like health and safety conditions or freedom of association. And if one customer at a factory can demonstrate that improvements are possible, other customers no longer have an excuse not to act. The development and sharing of these types of best practices has long been a core part of FWF's work.

The Brand Performance Check system is designed to accommodate the range of structures and strengths that different companies have, and reflects the different ways that brands can support better working conditions.

This report is based on interviews with affiliate employees who play important roles in the management of supply chains, and a variety of documentation sources, financial records, supplier data. The findings from the Brand Performance Check are summarized and published at www.fairwear.org. The online [Brand Performance Check Guide](#) provides more information about the indicators.

BRAND PERFORMANCE CHECK OVERVIEW

LaDress B.V.

Evaluation Period: 01-01-2014 to 31-12-2014

AFFILIATE INFORMATION	
Headquarters:	Amsterdam, Netherlands
Member since:	01-01-2014
Product types:	Fashion
Production in countries where FWF is active:	Romania, Poland, the Netherlands
Production in other countries:	France
BASIC REQUIREMENTS	
Workplan and projected production location data for upcoming year have been submitted?	Yes
Actual production location data for evaluation period was submitted?	Yes
Membership fee has been paid?	Yes
All suppliers have been notified of FWF membership?	Yes
SCORING OVERVIEW	
% of own production under monitoring	30%
Benchmarking score	61
Category	Good

Summary:

LaDress is in process of implementing FWF's management system requirements. The sourcing policy of LaDress supports the implementation of the Code of Labour Practices. The company has stable and long term relationships with their suppliers; particularly with their main supplier in Romania, where nearly 70% of LaDress' 2014 purchasing volume is produced and where the company has substantial leverage.

The first year of FWF membership LaDress invested in informing all factories of the Code of Labour Practices. La Dress has implemented the monitoring requirements for low risk countries, accounting for 30% of its 2014 production volume. An audit conducted by FWF's team at their main supplier in Romania took place in the beginning of 2015. FWF has decided to award LaDress with the Good rating.

LaDress' production planning systems support reasonable working hours. LaDress items are not seasonable, but produced in a constant flow, all year round. The audit conducted in Romania did not conclude excessive overtime took place.

LaDress can take next steps in systematically integrating monitoring and assessing progress in working conditions in the company's work processes. Moreover, LaDress can gain more insight into wage levels at their suppliers.

It is FWF's belief that members who are making a serious effort to implement the Code of Labour Practices—the vast majority of FWF members—are 'doing good' and deserve to be recognized as such. They are also doing more than the average clothing company, and have allowed their internal processes to be examined and publicly reported on by an independent NGO.

Score: 61 Percentage under monitoring: 30% Category: Good

PERFORMANCE CATEGORY OVERVIEW

Leader: This category is for affiliates who are doing exceptionally well, and are operating at an advanced level. Leaders show best practices in complex areas such as living wages and freedom of association.

Good: It is FWF's belief that affiliates who are making a serious effort to implement the Code of Labour Practices—the vast majority of FWF affiliates—are 'doing good' and deserve to be recognized as such. They are also doing more than the average clothing company, and have allowed their internal processes to be examined and publicly reported on by an independent NGO. The majority of affiliates will receive a 'Good' rating.

Needs Improvement: Affiliates are most likely to find themselves in this category when major unexpected problems have arisen, or if they are unable or unwilling to seriously work towards CoLP implementation. Affiliates may be in this category for one year only after which they should either move up to Good, or will be moved to suspended.

Suspended: Affiliates who either fail to meet one of the Basic Requirements, have had major internal changes which means membership must be put on hold for a maximum of one year, or have been in Needs Improvement for more than one year. Affiliates may remain in this category for one year maximum, after which termination proceedings will come into force.

Categories are calculated based on a combination of benchmarking score and the percentage of own production under monitoring. The specific requirements for each category are outlined in the Brand Performance Check Guide.

1. PURCHASING PRACTICES

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.1 Percentage of production volume from suppliers where affiliate buys at least 10% of production capacity	96%	Affiliates with less than 10% of a factories' production capacity generally have limited influence on factory managers to make changes.	Supplier information provided by affiliate.	4	4	0

Comment: LaDress has a strong partnership with their main supplier in Romania that produces nearly exclusively for LaDress. LaDress is a fast growing brand and aims to expand with existing suppliers who have the opportunity to grow with LaDress. New staff is hired in the Romanian factory who are trained to maintain the quality of LaDress production.

1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years	26%	Stable business relationships support most aspects of the Code of Labour Practices, and give factories a reason to invest in improving working conditions.	Supplier information provided by affiliate.	2	4	0
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Recommendation: FWF recommends LaDress to consolidate its supplier base where possible, and increase leverage at main supplier(s) to effectively request improvements of working conditions.

Comment: LaDress has a stable supplier base and values long term and trust worthy relationships. The company started production in the Netherlands and France. Given the company's growth it had to expand to Poland and new production locations in Romania. It started working with their main partner in Romania four years ago, which they will continue in the future.

1.3 All new suppliers are required to sign and return the Code of Labour Practices before first orders are placed.	Yes	The CoLP is the foundation of all work between factories and brands, and the first step in developing a commitment to improvements.	Signed CoLPs are on file.	2	2	0
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Comment: Upon membership of FWF, LaDress has informed all factories of FWF and sent the questionnaire with the Code of Labour Practices. Signed questionnaires were reviewed on file.

1.4 Company conducts human rights due diligence at all new suppliers before placing orders.	Yes	Due diligence helps to identify, prevent and mitigate potential human rights problems at new suppliers.	Documentation may include pre-audits, existing audits, other types of risk assessments.	4	4	0
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Recommendation: When LaDress continues growing and will be selecting new suppliers, it is suggested to further develop a systematic approach towards assessing possible human rights risks. Documenting the outcome of these assessments can help to include it in future sourcing decisions. FWF country information can be used for investigating potential human rights risks.

Comment: One new supplier was selected in Romania in 2014. LaDress always visits potential new suppliers and aims to set up strong partnerships. To establish that, close cooperation is required with factories that are willing to grow and learn together with LaDress. Labour conditions are evaluated through visual inspections using the FWF health and safety guidelines, through discussing the labour standard and evaluating the willingness to audit and improve social compliance.

1.5 Supplier compliance with Code of Labour Practices is evaluated in a systematic manner.	Yes	A systemic approach is required to integrate social compliance into normal business processes, and supports good decisionmaking.	Documentation of systemic approach: rating systems, checklists, databases, etc.	1	2	0
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Recommendation: FWF recommends LaDress to structurally integrate working conditions into their evaluation system. Particularly with the audit conducted in Romania in 2015, the company can keep track of the progress on the implementation of the Code of Labour Practices and document the outcomes as input for their sourcing strategy. The evaluation of working conditions at other suppliers through own assessments should form a basis for overall supplier base evaluation.

Comment: LaDress has a system to evaluate craftsmanship as well as labour standards to keep track of progress. However, since it is the first year of FWF membership the company has not yet drawn any conclusions yet in terms of how this influences sourcing decisions.

1.6 The affiliate's production planning systems support reasonable working hours.	Strong, integrated systems in place.	Affiliate production planning systems can have a significant impact on the levels of excessive overtime at factories.	Documentation of robust planning systems.	4	4	0
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Comment: LaDress' forecasting system is based on weekly sales overview. A preferred delivery date is set in cooperation with the factory management and the production team is in constant communication about the delivery. LaDress items are not seasonable, but produced in a constant flow, all year round, 2 dresses a week. It makes it easier for the factory to schedule and manage the number of workers. Quantity and styles do not change after the final order is placed. LaDress is flexible to move around orders based on priority. Together with the main supplier in Romania, LaDress knows the production capacity and the time it takes to make the dresses. When the factory closed in August, a adjusted production planning is discussed together.

1.7 Degree to which affiliate mitigates root causes of excessive overtime.	No production problems documented.	Some production delays are outside of the control of affiliates; however there are a number of steps that can be taken to address production delays without resorting to excessive overtime.	Documentation of root cause analysis and positive steps taken to manage production delays or improve factory processes.	N/A	6	0
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Recommendation: Even though excessive overtime is not a common practice in Romania and Poland and the audit conducted in 2015 did not show excessive overtime, FWF recommends LaDress to research the production capacity and working hours of the suppliers the company works in relation to its own production planning, particularly for the factories other than the main Romanian supplier.

Comment: LaDress can split orders and can postpone the delivery time in case a deadline is not met.

1.8 Affiliate's pricing policy allows for payment of at least the legal minimum wages in production countries.	Country-level policy	The first step towards ensuring the payment of minimum wages - and towards implementation of living wages - is to know the labour costs of garments.	Formal systems to calculate labour costs on per-product or country/city level.	2	4	0
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Recommendation: LaDress is recommended to assess their prices in relation to the share that is paid to workers. Increased transparency in costing and productivity gives insight in the labour costs per product. This forms the basis for ensuring enough is paid to cover at least minimum wage and for making steps towards living wages.

Comment: LaDress is aware of the minimum wage levels in Romania. The company can make an estimate of the FOB price divided by the number of workers, but does not know the exact labour costs in relation to their own pricing policy.

1.9 Affiliate actively responds if suppliers fail to pay legal minimum wages.	No data available	If a supplier fails to pay minimum wage, FWF affiliates are expected to hold management of the supplier accountable for respecting local labour law.	Complaint reports, CAPs, additional emails, FWF audit reports or other documents that show minimum wage issue is reported/resolved.	N/A	2	-2
1.10 Evidence of late payments to suppliers by affiliate.	No	Late payments to suppliers can have a negative impact on factories and their ability to pay workers on time. Most garment workers have minimal savings, and even a brief delay in payments can cause serious problems.	Based on a complaint or audit report; review of factory and affiliate financial documents.	0	0	-1
1.11 Degree to which affiliate assesses root causes of wages lower than living wages with suppliers and takes steps towards the implementation of living wages.	Basic approach	Sustained progress towards living wages requires adjustments to affiliates' policies.	Documentation of policy assessments and/or concrete progress towards living wages.	2	8	0

Requirement: Affiliate is expected to take an active role in discussing living wages with its suppliers. The FWF wage ladder can be used as a tool to implement living wages. Most relevant wage estimates, such as local minimum wage, Asia Floor Wage, collective bargaining wage and industrial best practice wages are provided in the wage ladder. The wage ladder is included in FWF's audit reports. It demonstrates the gaps between workers' wages at a factory and living wages demanded by major stakeholders. The wage ladder can be used to document, monitor, negotiate and evaluate the improvements at its suppliers.

Comment: LaDress has not yet discussed living wages with their suppliers. At the same time, around 30% of the 2014 purchasing volume comes from factories located in low risk areas where wages are covered by a Collective Bargaining Agreement negotiated by local institutes. Local institutions are in place to provide access to remedy and could support workers to negotiate their wages.

1.12 Affiliate sources from an FWF factory member.	No	When possible, FWF encourages affiliates to source from FWF factory members. On account of the small number of factories this is a 'bonus' indicator. Extra points are possible, but the indicator will not negatively affect an affiliate's score.	Supplier information provided by affiliate.	N/A	1	0
1.13 Percentage of production volume from factories owned by the affiliate.	None	Owning a supplier increases the accountability and reduces the risk of unexpected CoLP violations. Given these advantages, this is a bonus indicator. Extra points are possible, but the indicator will not negatively affect an affiliate's score.	Supplier information provided by affiliate.	N/A	2	0

PURCHASING PRACTICES

Possible Points: 32

Earned Points: 21

2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	0%	
% of own production in low risk production countries where FWF's Low Risk policy has been implemented	30%	FWF low risk policy should be implemented. 0 = policy is not implemented correctly. N/A = no production in low risk countries.
Total of own production under monitoring	30%	Minimums: 1 year: 40%; 2 years 60%; 3 years+: 90% Measured as a percentage of turnover.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.1 Specific staff person is designated to follow up on problems identified by monitoring system	Yes	Followup is a serious part of FWF membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	2	2	-2

Recommendation: The efforts of the CSR manager in communicating with factory management, will be enforced and more successful when the same message is given by the purchasing team or COO.

Comment: A new staff member was hired in 2014 to work on CSR, including FWF membership.

2.2 Degree of progress towards resolution of existing Corrective Action Plans	No Caps Active	FWF considers efforts to resolve CAPs to be one of the most important things that affiliates can do towards improving working conditions.	Documentation of remediation and followup actions taken by affiliate.	N/A	8	-2
2.3 Percentage of production volume from suppliers that have been visited by the affiliate in the past financial year	82%	Formal audits should be augmented by annual visits by affiliate staff or local representatives. They reinforce to factory managers that affiliates are serious about implementing the Code of Labour Practices.	Affiliates should document all factory visits with at least the date and name of the visitor.	4	4	0

Recommendation: It is recommended to structurally document outcomes of the visits for production sites (including subcontractors and production locations in low-risk countries). The reports of the visits can provide information for colleagues on the discussions of working conditions and ensures the same messages is given to suppliers from different LaDress staff. Regular visits provide the opportunities to discuss problems and corrective actions in the time period between formal audits.

Comment: LaDress staff visits most of their suppliers.

2.4 Existing audit reports from other sources are collected.	No	Existing reports form a basis for understanding the issues and strengths of a supplier, and reduces duplicative work.	Audit reports are on file; evidence of followup on prior CAPs. Reports of quality assessments.	0	3	0
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Recommendation: Collecting existing audits can be counted towards the monitoring threshold if the quality of the report is assessed using the FWF audit quality tool and corrective actions are implemented. LaDress can check this for the factories in Romania and Poland.

2.5 Audit Report and Corrective Action Plan (CAP) findings are shared with factory. Improvement timelines are established in a timely manner	No Corrective Action Plans active	2 part indicator: FWF audit reports were shared and discussed with suppliers within two months of audit receipt AND a reasonable time frame was specified for resolving findings.	Corrective Action Plans, emails; findings of followup audits; brand representative present during audit exit meeting, etc.	N/A	2	-1
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2.6 High risk issues specific to the affiliate's supply chain are identified and addressed by the monitoring system.	Intermediate Capacity	Different countries and products have different risks associated with them; monitoring systems should be adapted to allow appropriate human rights due diligence for the specific risks in each affiliates' supply chain.	Documentation may take many forms; additional research, specific FWF project participation; extra monitoring activities, extra mitigation activities, etc.	3	6	0
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Recommendation: In order to reach the advanced scoring, LaDress will have to demonstrate realised improvements after the recent audit at the Romanian supplier (will be checked during 2016 performance check). The specific areas to focus on for all Romanian suppliers are wage levels and increasing effective worker representation and awareness of labour rights through the Workplace Education Programme.

Comment: LaDress has deliberately chosen to conduct most part of its business in areas with considerably lower risks of human rights abuses. Production is done solely in European countries to emphasize the importance of good quality and working conditions. In addition, shorter distances within Europe allow for easier supervision.

Romania was selected as the main production country because of product quality, but also specifically because of the LaDress philosophy to combine fashion with ethical business practices. Other sourcing countries are Poland, France and the Netherlands. The company works together with MODINT on a project to ensure compliance with health and safety regulations for the new Grils' line with respect to specific children clothing safety regulations.

2.6a High risk issues specific to Bangladesh are identified and addressed by the monitoring system and remediation activities.	Not sourcing in Bangladesh	Affiliates sourcing in Bangladesh should take additional action to address both building and fire safety and the prevention of violence against women.	Building, electrical and fire safety inspection reports, evidence of cooperation with other customers sourcing at the same factories (Accord signatories and/or FWF affiliates), etc.	N/A	3	0
2.6b High risk issues specific to Myanmar are identified and addressed by the monitoring system and remediation activities.	Not sourcing in Myanmar	Myanmar is still in the process of establishing the legal and civil society infrastructure needed to ensure compliance with labour rights. Extra care must be taken when doing business in Myanmar.	Shared CAPs, Wage Ladders per factory.	N/A	3	0

2.7 Affiliate cooperates with other customers in resolving corrective actions at shared suppliers	No CAPs active or no shared suppliers.	Cooperation between customers increases leverage and chances of successful outcomes. Cooperation also reduces the changes of a factory having to conduct multiple Corrective Action Plans about the same issue with multiple customers.	Shared CAPs, evidence of cooperation with other customers.	N/A	2	-1
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2.8 Monitoring requirements are fulfilled for production in low-risk countries	No	Low risk countries are determined by the presence and proper functioning of institutions which can guarantee compliance with basic standards.	Documentation of visits, notification of suppliers of FWF membership; posting of worker information sheets, completed questionnaires.	0	2	0
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Requirement: Monitoring requirements need to be fulfilled for production in low-risk countries in order for it to be counted towards the monitoring threshold. All production sites in low-risk countries must:

- Be visited annually by affiliate representatives;
- Be informed of FWF membership and return the completed CoLP questionnaire before production orders are placed;
- Be aware of specific risks identified by FWF;
- Have the FWF Worker Information Sheet posted in local languages.

2.9 External brands resold by the affiliate who have completed and returned the external brand questionnaire. (% of external sales volume)	No external brands resold	FWF believes it is important for affiliates that have a retail/wholesale arm to at least know if the brands they resell are members of FWF or a similar organisation, and in which countries those brands produce goods.	Questionnaires are on file.	N/A	3	0
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2.10 External brands resold by affiliates that are members of another credible initiative. (% of external sales volume)	No external brands resold	FWF believes affiliates who resell products should be rewarded for choosing to stock external brands who also take their supply chain responsibilities seriously.	External production data in FWF's information management system. Documentation of sales volumes of products made by FWF or FLA members.	N/A	3	0
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MONITORING AND REMEDIATION

Possible Points: 17

Earned Points: 9

3. COMPLAINTS HANDLING

BASIC MEASUREMENTS	RESULT	COMMENTS
Number of worker complaints received since last check	0	At this point, FWF considers a high number of complaints as a positive indicator, as it shows that workers are aware of and making use of the complaints system.
Number of worker complaints in process of being resolved	0	
Number of worker complaints resolved since last check	0	

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.1 A specific employee has been designated to address worker complaints	Yes	Followup is a serious part of FWF membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	1	1	-1
3.2 System exists to check that the Worker Information Sheet is posted in factories	No	The Worker Information Sheet is a key first step in alerting workers to their rights.	Photos by company staff, audit reports, checklists from factory visits, etc.	0	2	0

Requirement: LaDress must ensure that the Worker Information Sheet, including contact information of the local complaints handler of FWF, is posted in all factories in a location that is accessible to all workers. LaDress should check by means of a visit whether the Worker Information Sheet is posted in the factories.

Recommendation: It is suggested to ask suppliers to submit a photo of the posted Worker Information Sheet with the annual questionnaire and to ask staff visiting a supplier to check if the documents are still posted as indicated on the obtained photo.

3.3 Percentage of FWF-audited factories where at least half of workers are aware of the FWF worker helpline.	No audits done or no FWF helpline available	The FWF complaints procedure is a crucial element of verification. If factory-based complaint systems do not exist or do not work, the FWF worker helpline allows workers to ask questions about their rights and file complaints. Factory participation in the Workplace Education Programme also count towards this indicator.	Percentage of audited factories where at least 50% of interviewed workers indicate awareness of the FWF complaints mechanism + percentage of factories in WEP programme.	N/A	4	-2
3.4 All complaints received from factory workers are addressed in accordance with the FWF Complaints Procedure	No complaints received	Providing access to remedy when problems arise is a key element of responsible supply chain management. Affiliate involvement is often essential to resolving issues.	Documentation that affiliate has completed all required steps in the complaints handling process.	N/A	6	-2
3.5 Cooperation with other customers in addressing worker complaints at shared suppliers	No complaints or cooperation not possible / necessary.	Because most factories supply several customers with products, involvement of other customers by the FWF affiliate can be critical in resolving a complaint at a supplier.	Documentation of joint efforts, e.g. emails, sharing of complaint data, etc.	N/A	2	-2

COMPLAINTS HANDLING

Possible Points: 3

Earned Points: 1

4. TRAINING AND CAPACITY BUILDING

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.1 All staff is made aware of FWF membership requirements	Yes	Preventing and remediating problems often requires the involvement of many different departments; making all staff aware of FWF membership requirements helps to support cross-departmental collaboration when needed.	Emails, trainings, presentation, newsletters, etc.	1	1	-1

Comment: All staff at LaDress is made aware of FWF membership when the company joined FWF. The CSR manager hired to work on FWF membership presented her goals and work on FWF membership to the entire staff when she started at LaDress.

4.2 Ongoing training in support of FWF requirements is provided to staff in direct contact with suppliers.	Yes	Sourcing, purchasing and CSR staff at a minimum should possess the knowledge necessary to implement FWF requirements and advocate for change within their organisations.	FWF Seminars or equivalent trainings provided; presentations, curricula, etc.	2	2	0
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Comment: The CSR manager attended the FWF seminar for affiliates and FWF's annual conference.

4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices.	Yes	Agents have the potential to either support or disrupt CoLP implementation. It is the responsibility of affiliate to ensure agents actively support the implementation of the CoLP.	Correspondence with agents, trainings for agents, FWF audit findings.	1	2	-2
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Recommendation: Agents could be used to actively support the implementation of the Code of Labour Practices. Training and active communication is needed to include agents in the monitoring system.

Comment: All agents have been informed of the membership with the Fair Wear Foundation. LaDress has been working on how to communicate the membership directly with factories affiliated with agents.

4.4 Factory participation in Workplace Education Programme (where WEP is offered; by production volume)	No production in WEP areas	Lack of knowledge and skills on best practices related to labour standards is a common issue in factories. Good quality training of workers and managers is a key step towards sustainable improvements.	Documentation of relevant trainings; participation in Workplace Education Programme.	N/A	6	0
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Recommendation: From 2015 onwards, FWF can offer the Workplace Education Programme in Romania. In order to ensure awareness and enhance understanding of the relevant labour standards, grievance mechanisms and the importance of a good mechanism for communication between employers and workers in the workplace, it is recommended to enrol the main supplier in Romania in the Workplace Education Programme.

4.5 Factory participation in trainings (where WEP is not offered; by production volume)	All production is in WEP areas.	In areas where the Workplace Education Programme is not yet offered, affiliates may arrange trainings on their own or work with other training-partners. Trainings must meet FWF quality standards to receive credit for this indicator.	Curricula, other documentation of training content, participation and outcomes.	N/A	4	0
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Comment: All of LaDress' production takes place in Romania or in countries classified as low risk.

TRAINING AND CAPACITY BUILDING

Possible Points: 5

Earned Points: 4

5. INFORMATION MANAGEMENT

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
5.1 Level of effort to identify all production locations	Intermediate	Any improvements to supply chains require affiliates to first know all of their production locations.	Supplier information provided by affiliate. Financial records of previous financial year. Documented efforts by affiliate to update supplier information from its monitoring activities.	3	6	-2

Recommendation: LaDress is recommended advised to further complete the supplier list, including all subcontractors for all product types that are produced in addition to dresses, for instance the new collections of beach wear, jackets and accessories. Part of the approach can be:

- 1) automatically include information from audit reports and complaints
- 2) Business relationships with agents include transparency of production locations.
- 3) Agreements with factories on the use of subcontractors stating clearly that when subcontractors are used, they are included in the monitoring system and information is shared on the subcontracted production process.

Comment: LaDress uses the FWF questionnaire to collect information on subcontractors and update the supplier list, among others in Poland. The factories in Romania are visited often.

5.2 A system exists to allow purchasing, CSR and other relevant staff to share information with each other about working conditions at suppliers	Yes	CSR, purchasing and other staff who interact with suppliers need to be able to share information in order to establish a coherent and effective strategy for improvements.	Internal information system; status CAPs, reports of meetings of purchasing/CSR; systematic way of storing information.	1	1	-1
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Recommendation: FWF advises the CSR manager to systematically inform colleagues how to check labour conditions before they visit suppliers. The CSR manager should make relevant staff aware of the available tools FWF offers, such as the Health and Safety guidelines, monitoring CAP documents, access to FWF's online information system. Purchasing staff is recommended to share reports from factory visits that include a status update of implementing the CoLP. This ensures that the factories receive the same message from LaDress, whether it comes from the CSR manager, the purchasing team or COO.

Comment: Within the close team of purchasing staff and CSR, FWF membership is frequently discussed in meetings.

INFORMATION MANAGEMENT

Possible Points: 7

Earned Points: 4

6. TRANSPARENCY

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
6.1 Communication about FWF membership adheres to the FWF communications policy	Yes	FWF membership should be communicated in a clear and accurate manner. FWF guidelines are designed to prevent misleading claims.	Logo is placed on website; other communications in line with policy. Affiliates may lose points if there is evidence that they did not comply with the communications policy.	1	1	-2

Comment: FWF membership is described in correct wording on the LaDress website.

6.2 Affiliate engages in advanced reporting activities	No	Good reporting by members helps to ensure the transparency of FWF's work and shares best practices with the industry.	Affiliate publishes one or more of the following on their website: Brand Performance Check, Audit Reports, Supplier List.	0	1	0
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Recommendation: FWF recommends LaDress to publish one or more of the following reports on its website: brand performance check, audit reports, supplier information. Good reporting by members helps to ensure the transparency of the affiliate and FWF's work.

6.3 Social Report is submitted to FWF and is published on affiliate's website	Complete report submitted to FWF	The Social Report is an important tool for affiliates to transparently share their efforts with stakeholders.	Report adheres to FWF guidelines for Social Report content.	1	2	-2
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Requirement: FWF approach requires transparency on affiliates work towards social standards. The social report needs to be submitted to FWF and published on affiliate's website.

Comment: The social report is not yet placed on the company's website.

TRANSPARENCY

Possible Points: 4

Earned Points: 2

7. EVALUATION

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
7.1 Systemic annual evaluation of FWF membership is conducted with involvement of top management	Yes	An annual evaluation involving top management ensures that FWF policies are integrated into the structure of the company.	Meeting minutes, verbal reporting, Powerpoints, etc.	2	2	0

Recommendation: FWF advises to discuss the outcomes of this performance check with the production staff, the CSR manager and the management team. It can be used to prioritize and set goals for next year.

Comment: All decisions related to FWF membership are made in cooperation with the two directors. It is evaluated regularly if the outcomes and progress are still corroborating with the LaDress philosophy and strategy.

7.2 Changes from previous Brand Performance Check implemented by affiliate	No requirements were included in previous Check	In each Brand Performance Check report, FWF may include requirements for changes to management practices. Progress on achieving these requirements is an important part of FWF membership and its process approach.	Affiliate should show documentation related to the specific requirements made in the previous Brand Performance Check.	N/A	4	-2
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EVALUATION

Possible Points: 2

Earned Points: 2

RECOMMENDATIONS TO FWF

When the CSR manager observed the recent audit in Romania, it was occasionally experienced as an environment where the factory management felt attacked. Given this was the first audit, the CSR manager felt the management may have needed a more explanatory introduction in order to set a comfortable environment.

SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	21	32
Monitoring and Remediation	9	17
Complaints Handling	1	3
Training and Capacity Building	4	5
Information Management	4	7
Transparency	2	4
Evaluation	2	2
Totals:	43	70

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

61

PERFORMANCE BENCHMARKING CATEGORY

Good

BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

21-05-2015

Conducted by:

Annabel Meurs

Interviews with:

Gillian Stoddard (CSR manager)

Anthony Mak van Waay (COO)

Eva Salomons (production management)

Audit Summary:

Publication of the audit summary section previously included in Brand Performance Checks has been suspended while Fair Wear Foundation develops a new information system to manage and summarize the data.