



## BRAND PERFORMANCE CHECK

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HempAge

PUBLICATION DATE: FEBRUARY 2014

this report covers the evaluation period 01-01-2012 to 31-12-2012

## ABOUT THE BRAND PERFORMANCE CHECK

Fair Wear Foundation believes that improving conditions for apparel factory workers requires change at multiple levels. Traditional efforts to improve conditions focus primarily on the factory. FWF, however, believes that the management decisions of the 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.

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.

Improvement of supply chains is a step-by-step process, through which affiliates must address many different issues. FWF affiliates vary greatly in management structures, and have different strengths. The Performance Benchmarking system is designed to reflect these differences, and the many different ways that a company can support better working conditions.

During the Brand Performance Check, FWF staff speak to various employees at the affiliate who have important roles to play in the management of supply chains. FWF verifies the actions of affiliates based on several sources including documentation of activities, financial records, the affiliate's supplier register and staff interviews. Following the Brand Performance Check, FWF summarizes findings in this report, which is made public via [www.fairwear.org](http://www.fairwear.org). The [Brand Performance Check Guide](#) provides more information about the indicators and is available for download.

## BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

21-10-2013

Conducted by:

Stefanie Santila Karl

Interviews with:

Robert Hertel (Director)

Tilman Herzog (Ecology and CSR, Key Account Management)

Scoring:

Affiliate Benchmarking scores and Performance Benchmarking categories will be published starting in 2014. During 2013, FWF will be testing out the new system and evaluating the appropriate threshold levels for Benchmarking categories.

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. Future Brand Performance Checks will include improved usability and transparency for audit data.

AFFILIATE INFORMATION	
Headquarters:	Adelsdorf
Member since:	01-10-2009
Product types:	Fashion
Production in countries where FWF is active:	China
Production in other countries:	Philippines, Germany, Hungary
BASIC REQUIREMENTS	
Workplan for this evaluation period was submitted?	Yes
Projected supplier register for this evaluation was submitted?	Yes
Actual supplier register for this evaluation period has been submitted?	Yes
Membership fee has been paid?	Yes
All suppliers have been notified of FWF membership?	Yes
SCORING OVERVIEW	
% of own production under monitoring	96%

## Summary:

FWF conducted the third Brand Performance Check at HempAge end of October 2012. Beginning of 2013, FWF has decided to change evaluation of FWF affiliates from moment of joining to financial year of the affiliate. HempAges' financial year equals the calendar year. Since January to October 2012 have been covered with last year's brand performance check, this BPC functions as a duplicate for the first months of 2012 adding activities of HempAge in November and December 2012.

HempAge meets most of FWFs management system requirements and the threshold of 90% which is required on the basis of the duration of membership. Most of HempAge's production is done at one supplier in China where HempAge has substantial leverage of production. The supplier became FWF factory member in June 2011. Approx. 10% of the production is subcontracted from the main supplier to three subcontractors. Orders are subcontracted for specific clothing items. HempAge is looking for a new partner as an alternative to the subcontractors. In the meanwhile further efforts are needed to implement all of FWFs requirements at the subcontractors in use.

# 1. PURCHASING PRACTICES

BASIC MEASUREMENTS	RESULT	COMMENTS
Percentage of production in low-risk countries	0%	Countries with relatively low risk of labour violations as defined by FWF.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION
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 register provided by affiliate.

Comment: HempAge buys 10% of the main factories production capacity. The factory in China is FWF factory member.

Some product categories are produced at subcontractors to HempAge's main supplier in China. Subcontractors are known but HempAge has limited leverage, which means in practice that limitations may exist in what improvements can be requested. Due to technical and quality problems at the subcontractors, HempAge actively looks for a new partner to work together with. Strategy is to remain a major part of the production at the FWF factory member in China but not the subcontractors.

1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years	96%	Stable business relationships support most aspects of the Code of Labour Practices, and give factories a reason to invest in improving working conditions.	Supplier register provided by affiliate.
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Comment: The company has a long term relationship of more than 10 years with its main supplier of clothing, which represents more than 90% of its purchasing volume.

1.3 Labour conditions are considered when selecting new suppliers	Yes	Including labour conditions considerations in selecting suppliers supports responsible business practices.	Documentation of decisionmaking process; e.g. checklists for buyers, emails, etc.
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Comment: To reduce the need of subcontractors for the main production site in China, HempAge invests in a new production site in the Philippines. Labour conditions have been considered with this new supplier straight from the beginning. The director who is also responsible for social standards at HempAge has visited the production site and inspected and discussed labour conditions in detail with factory management.

1.4 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.
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Comment: Suppliers are requested to sign the questionnaire that refers to FWFs Code of Labour Practices before order placement. Proof was given with regard to the production site in the Philippines, the only new supplier in the evaluation period.

1.5 Company conducts audits at all new suppliers before placing orders	N/A	An important due diligence step. Before placing production orders, affiliates should conduct an audit at all new suppliers to assess risks for CoLP violations.	Audit documentation; must meet FWF audit quality standards.
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Comment: HempAge does not conduct audits at all new suppliers before placing orders. However existing audit reports have been requested straight from the beginning. The director visits new production sites and addresses explicitly social standards and production conditions at the production site.

1.6 Affiliate sources from an FWF factory member	Yes	When possible, FWF encourages affiliates to source from FWF factory members. The small number of factories in the programme means sourcing from FWF factory members cannot be a requirement.	Supplier register provided by affiliate.
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Comment: HempAge's main supplier where more than 90% of the products are sourced became FWF factory member in summer 2011.

1.7 Percentage of production volume from factories owned by the affiliate	0%	Owning a supplier provides clear accountability for and direct influence over working conditions. It reduces the risk of unexpected CoLP violations.	Supplier register provided by affiliate.
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Comment: HempAge does not source from production sites which are owned by the FWF affiliate.

1.8 Supplier compliance with Code of Labour Practices is evaluated in a systemic manner	Yes, and improvement is rewarded	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.
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Comment: There is neither a formal system nor a systematic manner of supplier evaluation at HempAge. However, HempAge enabled its main supplier in China already in summer 2011 to become FWF factory affiliate and ever since orders in a stable manner at that production site. Hence supplier compliance and improvements are considered rewarded. Considering the low amount of production sites of HempAge a systematic manner is not needed to evaluate suppliers' compliance with the Code of Labour Practice.

1.9 The affiliate's production planning systems support reasonable working hours	General or ad-hoc system	Affiliate production planning systems can have a significant impact on the levels of excessive overtime at factories.	Documentation of robust planning systems.
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Comment: HempAge produces two collections per year. The company fixes its prices for every production season of six months in dialogue with suppliers. HempAge gives estimates on order quantities and fabric orders to suppliers as early as possible. As a result of its business model and niche market, HempAge is able to offer its suppliers flexibility on lead times. Rather than placing pressure on suppliers through delivery times, HempAge delays its catalogue for the new season. Material and trimming is not delivered to the supplier.

1.10 Percentage of production volume from suppliers where excessive overtime is found by FWF	96%	Excessive overtime is one of the most common labour rights violations in high-risk production countries. It is often caused by poor production planning by brands.	Audits conducted by FWF auditors; Complaints filed via the FWF worker helpline.
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**Recommendation:** The affiliate is recommended to dialogue with supplier on the causes of excessive overtime (for a more detailed recommendation please refer to 1.11).

**Comment:** Overtime is still an issue at HempAge’s main supplier who has been re-audited in 2012 to verify improvements.

1.11 Degree to which affiliate analyses and mitigates root causes of excessive overtime	Reactive approach	Affiliate production planning systems can have a significant impact on the levels of excessive overtime at factories.	Examples of root cause analyses and resulting changes in production planning/policy.
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**Requirement:** As overtime was found again in the verification audit, the affiliate should investigate to what extent its current buying practices has an effect on the working hours at supplier level. A root cause analysis of excessive overtime should be done to investigate which steps can be most effective to reduce overtime. If necessary, the affiliate could hire local experts to analyse root cause of excessive overtime in cooperation with the supplier. FWF could recommend qualified persons upon request.

**Comment:** HempAge assesses the root causes of overtime with it’s suppliers when found.

1.12 Affiliate’s pricing policy allows for payment of at least the legal minimum wages in production countries	Policy at a country level	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.
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**Recommendation:** FWF recommends HempAge to analyse pricing at a style level where cost of labour is known for the different production styles. Knowing this, HempAge is recommended to conduct a root cause analysis for possibilities on how to pay a living wage to its suppliers.

**Comment:** The affiliate can demonstrate a pricing system based on country level data. Minimum wage levels are known by affiliate in all production countries. Due it’s nature in size, Hemp Age does not have a formal pricing policy. Payments are done on basis of suppliers’ invoices.



1.13 Affiliate actively responds if suppliers fail to pay legal minimum wages	Yes	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.
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Comment: Wages lower than minimum wage was found in China in the cutting section. The director of HempAge spoke to the top management of the production site during a business trip to China. The topic was on top discussed with the worker representatives. Immediate remediation for the workers in the cutting section was done.

1.14 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.
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Comment: The verification audit at the main supplier in China did not indicate late payments to the supplier by HempAge.

1.15 Degree to which affiliate assesses root causes of wages lower than living wages with suppliers	Factory level approach	Sustained progress towards living wages requires adjustments to affiliates' policies.	Wage ladders, correspondence with supplier, other relevant documentation.
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Comment: HempAge has tested the FWF wage ladder internally asking the supplier for wage data. A conclusion was that wages are above minimum but wages in the cutting department have been much lower than in other departments. HempAge has agreed with the supplier to increase wages at the cutting department to have less discrepancy between the different departments.

## Additional comments on Purchasing Practices:

Only one style of jeans is designed in a way that it is at risk that sandblasting could be used. HempAge is strictly against sandblasting during jeans production. HempAge is at the production site before production starts and also several times during the year. According to HempAge there is no machinery for sandblasting at the factory. Jeans production is also done at a subcontractor which they are looking for a replacement at the moment. HempAge is interested in using laser/ozone wash in future only.

HempAge delivers products to some FWF affiliates. Those are produced at the main production site in China also on behalf of HempAge customers with the customers' labels if requested.

## 2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
Total % of own production under monitoring	96%	Measured as a percentage of turnover.
Minimum monitoring threshold based on years of membership (Threshold is 40% first year, 60% second year of membership and 90% thereafter)	Does meet threshold	

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION
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.

Comment: The director of HempAge together with his CSR colleague are responsible to follow up on problems identified by monitoring system.

2.2 Degree of progress towards resolution of existing Corrective Action Plans	Moderate efforts have been made to address most CAPs	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.
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Comment: The director at HempAge regularly travels to the production sites. Social standards are always a point of discussion. Detailed reports as agreements are made and agreed upon for further implementation. In addition to this HempAge employs a full time local quality controller which visits the factories and pays attention to basic issues on social standards. Through these visits and by means of frequent communication HempAge actively follows up on corrective action plans.

2.3 Percentage of production volume from suppliers that have been visited by the affiliate in the past financial year	96%	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.
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Comment: The director at HempAge regularly travels to the production sites.

2.4 Existing audit reports are collected	Yes, quality assessed and corrective actions implemented	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.
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Comment: HempAge collects existing audit reports from factories and uses the FWF Audit Quality Assessment Tool to check the audit report quality and to implement findings reported in the document. Until now, HempAge did only receive existing audit reports where no CAPs had to be followed up. However existing audit reports are anyway discussed with factory management during visits at the production site.

2.5 Audit Report and Corrective Action Plan (CAP) findings are shared with factory. Improvement timelines are established in a timely manner	Yes	FWF audit reports should be shared and discussed with suppliers within two months of audit receipt. Timely sharing of information and agreement on corrective actions is essential for improvement. A reasonable time frame should be specified for resolving findings.	Corrective Action Plans, emails; findings of followup audits; brand representative present during audit exit meeting, etc.
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Comment: Audit Report and Corrective Action Plan (CAP) findings are shared with factory. Improvement timelines are established in a timely manner.

2.6 A structured approach is used to address issues that occur at multiple suppliers	No	Issues that occur in multiple factories often need to be addressed in a systemic manner, especially when the root causes are located in brand management choices or from regionally specific issues (e.g. fire safety, gender discrimination and harassment).	Documentation of a systemic approach: root cause analyses, productivity assessments, guidance documents, internal system changes, etc.
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**Recommendation:** FWF suggests that the affiliate analyses whether findings from a factory audit could occur at other suppliers as well. This will lead to a preventive approach where issues are addressed in a systematic manner. The analysis should focus on own brand practices as well as regional or country specific issues (such as fire safety or gender discrimination). HempAge established at its main supplier a well functioning worker representative. This best-practice could be a starting point for implementation of functioning internal grievance mechanisms at other production sites.

**Comment:** Until now HempAge concentrated on implementation of findings at its main supplier. A structured approach to address issues that occur at multiple suppliers is not in use until now.

2.7 Affiliate cooperates with other customers in resolving corrective actions at shared suppliers	Active cooperation	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.
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**Comment:** HempAge delivers products to some other FWF affiliates and herewith also shared audit reports and results. HempAge has always been open to cooperate with other customers. HempAge started discussions with other customers of production sites. The mainly US based customers have not been open and sharing with regard to labour conditions so far.

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.
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**Recommendation:** 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 at least annually by affiliate representatives;
- Be informed of FWF membership and return the completed CoLP questionnaire before production orders are placed;
- Post the FWF Worker Information Sheet 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.
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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.	Supplier register; Documentation of sales volumes of products made by FWF or FLA members.
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### 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		
Number of worker complaints resolved since last check		

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION
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.

Comment: HempAge has a designated person in place to handle complaints. This is the director of HempAge himself.

3.2 System exists to check that the Worker Information Sheet is posted in factories	Yes	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.
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Comment: Production sites are frequently visited which is the moment when the posting of the Worker Information Sheet is checked.

3.3 Percentage of audited factories where at least half of workers are aware of the FWF worker helpline	100%	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.	Percentage of audited factories where at least 50% of interviewed workers indicate awareness of the FWF complaints mechanism.
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Recommendation: FWF recommends to carefully checking the posting of the CoLP at the subcontractors. This is a shared responsibility of the main production site and HempAge.

Comment: FWF verified that the FWF Code of Labour Practices including the contact information of the local complaints handler of FWF is posted in the work place of the main supplier of HempAge.

3.4 All complaints received from factory workers are addressed in accordance with the FWF Complaints Procedure	No complaints were received during past financial year	Involvement by the FWF affiliate is crucial in resolving a complaint at a supplier.	Documentation that affiliate has completed all required steps in the complaints handling process.
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3.5 Cooperation with other customers in addressing worker complaints at shared suppliers	No complaints were received during past year	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.
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## 4. TRAINING AND CAPACITY BUILDING

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION
4.1 Staff at affiliate 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.

Comment: HempAge staff is sufficiently informed about FWF membership and steps taken for the implementation of the Code of Labour Practices.

4.2 Advanced training is provided to staff in direct contact with suppliers on CoLP requirements	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.
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Comment: At HempAge the only direct contact to the production sites is the director himself who is also responsible for social standards and FWF membership requirements.

4.3 Agents are informed of CoLP requirements and act to support their implementation	Affiliate does not use agents	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.
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4.4 Factory participation in Workplace Education Programme (where WEP is offered; by production volume)	0%	Lack of knowledge 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.
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**Recommendation:** The affiliate is recommended to enrol a greater number of its suppliers in FWFs Workplace Education Programme (WEP), which offers trainings factories producing for FWF members. WEP trainings contribute to social dialogue between workers and management. The introductory training of WEP builds awareness of labour standards and strengthens dispute handling mechanisms. It is made available to FWF members free of charge.

**Comment:** The suppliers of HempAge have not joined the FWF Workplace Education Programme yet. But HempAge is interested to learn more and to also push its supplier and production site to participate.

4.5 Factory participation in trainings (where WEP is not offered; by production volume)	0%	In areas where the Workplace Education Programme is not yet offered, affiliates may arrange trainings on their own. Trainings must meet FWF quality standards to receive credit for this indicator.	Curricula, other documentation of training content, participation and outcomes.
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**Recommendation:** Whenever the FWF affiliate contacts a new supplier, this new supplier must also be informed on the implications of FWF membership. Next to that all factory workers should be informed about the labour standards and the process of monitoring and remediation. In order to further communication between employers and workers in the workplace FWF recommends affiliates to arrange trainings on their own in areas where the Workplace Education Programme is not yet offered. Trainings must meet FWF quality standards to receive credit for this indicator: top management, supervisors and workers should be included in the trainings, separately. Workplace standards and dispute handling should be included in the training. At least 10-20% of the workforce must be trained, depending on the size of the factory. Worker participations should be balanced and representative. FWF recommends HempAge to get in contact with ILO Better Work with regard to possible trainings at the production site in the Phillipines.

**Comment:** None of the production sites was enrolled in trainings similar to WEP.

**Additional comments on Training and Capacity Building:**

The local partner participated in a WRAP training course in Shanghai in September 2012.

## 5. INFORMATION MANAGEMENT

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION
5.1 Supplier register for the previous financial year is verified as being complete and accurate	Yes	Any improvements to supply chains require affiliates to first know all of their suppliers.	Completed supplier register; Financial records of previous financial year.

Comment: HempAge has a designated person to update the supplier register. HempAge has a functioning workflow to keep its supplier register up to date. The supplier register of HempAge for 2012 meets the requirements of FWF. It lists all factories that manufacture clothing for HempAge, including subcontractors.

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.
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## 6. TRANSPARENCY

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION
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.

**Requirement:** FWF membership should be communicated according to the FWF communications policy. Information on FWF and membership requirements needs to be added.

**Comment:** HempAge mainly informs the external public about its FWF membership through its website. In addition the company informs consumers about FWF membership by means of product hangtags and its product catalogue. The website of HempAge includes the link to FWF and logo but does not explain what FWF and membership to FWF is about.

6.2 Affiliate engages in advanced reporting activities	Yes	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.
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**Comment:** HempAge is very transparent with regard to implementation of FWF membership. The company published the factory audit reports on its website. Its annual report includes the names of suppliers and subcontractors and offers a detailed status update on the corrective action plan resulting from the most recent audit.

6.3 Social Report is submitted to FWF and is published on affiliate's website	Yes	The Social Report is an important tool for brands to transparently share their efforts with stakeholders.	Report adheres to FWF guidelines for Social Report content.
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Comment: HempAge submitted its 2011 annual social report to FWF and made it public through its website. The annual social report contains all necessary information.

**Additional comments on Transparency:**

HempAge uses FWF communication material actively such as the customer brochure.

## 7. EVALUATION

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION
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.

Comment: HempAge evaluates its FWF membership as part of on-going discussions with their main production site in China. As HempAge is a small team and the director is responsible for FWF membership requirements and follow up with production sites, no further formal annual system for evaluation of FWF membership is needed.

7.2 Percentage of required changes from previous Brand Performance Check implemented by affiliate	100%	In each Brand Performance Check report, FWF may include requirements for changes to management practices. Adherence to these requirements is an important part of FWF membership.	Affiliate should show documentation related to the specific requirements made in the previous Brand Performance Check.
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Comment: FWF has given three requirements in the previous Brand Performance Check 2011. Two of the requirements have been fulfilled, one is not applicable anymore.

## RECOMMENDATIONS TO FWF

HempAge would appreciate higher marketing and acquisition activities of FWF in the French market.

FWF is well known within the blogger community in Germany. However not with organisations such as ecouterre. HempAge would appreciate more FWF activities to get FWF more known in such forums.