



BRAND PERFORMANCE CHECK

Nudie Jeans Co.

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. 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:

22-08-2013

Conducted by:

Annabel Meurs

Interviews with:

Sandya Lang (CSR Manager/FWF contact person)

Palle Stenberg (CEO)

Peter Frank (Manager Product Development)

Andreas Åhrman (Marketing)

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:	Göteborg
Member since:	01-11-2009
Product types:	Fashion
Production in countries where FWF is active:	Romania, Turkey, Italy, Portugal, Tunisia, India, Lithuania
Production in other countries:	Germany, Sweden, Sri Lanka
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	99%

Summary:

Nudie Jeans meets most of FWF's management system requirements. The company has a coherent and integrated vision on sustainability and social standards, and has a formal sourcing policy that takes code implementation into account. Over 90% of Nudie Jeans' total purchasing volume is sourced from low risk countries Italy and Portugal. This, in addition to high leverage at suppliers and the stable relationships with suppliers, gives the company a strong basis for effectively monitoring working conditions. The company is making steps to increase wages at one supplier in India. Nudie Jeans can make steps towards analysing the root causes of excessive overtime and how this relates to its own buying practices. Nudie Jeans has monitoring nearly 100% of their supply chain and therefore meets FWF's monitoring threshold.

1. PURCHASING PRACTICES

BASIC MEASUREMENTS	RESULT	COMMENTS
Percentage of production in low-risk countries	91%	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	90%	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: Nudie Jeans has a consolidated supplier base with a contained number of suppliers where they have high leverage. 90% of its production volumes is from suppliers where they buy at least 10% of the factories' production capacity. This gives the company a strong position to effectively request improvements of working conditions.

1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years	78%	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: Nudie Jeans maintains a long term relationship of over 5 years with suppliers that account for 78% of the company's production volume. The stable business relationships support working on improvements with suppliers.

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: Three new suppliers were selected in 2012. A formal process exists to evaluate conditions at suppliers before placing orders. Nudie Jeans invests in stakeholder relations and researches wage benchmarks of the country in the FWF Wage Ladder tool. The company always visits the supplier before placing orders. Information on FWF requirements is shared and discussed at an early stage. The willingness of factory management to cooperate on improvements is a crucial element in deciding to start and continue a business relationship. Findings from this process are shared extensively among production and CSR department, ensuring all aspects are included in the decision making process of selecting a new supplier.

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: The new suppliers are requested to sign the Code of Labour Practices (CoLP) and to complete the questionnaire on the FWF labour standards.

1.5 Company conducts audits at all new suppliers before placing orders	Yes	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: At one of the new suppliers in India, Nudie Jeans conducted an audit before bulk production started to assess the level of working conditions at the factory.

1.6 Affiliate sources from an FWF factory member	No	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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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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1.8 Supplier compliance with Code of Labour Practices is evaluated in a systemic 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.
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Comment: Nudie Jeans has a system to evaluate suppliers with social compliance as criteria. The company actively supports its suppliers with regard to implementation of the Code of Labour Practices. Nudie Jeans has a grading system that includes progress on willingness and improvements regarding social compliance.

1.9 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.
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Comment: The order placement of Nudie Jeans offers suppliers space to avoid excessive overtime. As a result of its business model and design, Nudie Jeans is able to offer its suppliers flexibility on lead times. The majority of production volume comes from Europe. Delivery times and the priorities of orders are set in cooperation and agreement with suppliers. Lead times are in general 6-8 weeks. However, when the supplier cannot make the order, Nudie Jeans can postpone deadlines and complete its orders with other denim production. Stock orders are used to spread to low periods of the factory. Nudie Jeans never experiences late changes given that the design and styles do not change during production. In setting lead times, the time frame always includes extra days to cover for potential delays. Order quantity is calculated based on the daily capacity of the factory. Nudie Jeans has direct contact with fabric suppliers to ensure timely delivery at manufacturing site and production planning is a shared process with suppliers.

1.10 Percentage of production volume from suppliers where excessive overtime is found by FWF	44%	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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Requirement: Nudie Jeans must gain knowledge of what factors in its sourcing practice pose a risk factor for excessive overtime. The affiliate should manage those factors and actively contribute to reducing excessive overtime at its suppliers.

Comment: 2 out of 4 audits conducted by FWF teams in 2012 concluded excessive overtime was found.

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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Recommendation: Nudie Jeans could discuss with factory management on the causes of excessive overtime and provide support to manage overtime. In case overtime is found, it should analyse if the company's buying practices for that order possible contributed to excessive overtime. If necessary, Nudie Jeans could hire local experts to analyse root cause of excessive overtime in cooperation with the supplier. FWF could recommend qualified persons upon request.

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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Comment: On country level Nudie Jeans is aware of minimum wages and how this generally relates to their pricing policy. However, when establishing prices and particularly when working through an agent, the cost of labour is not known for each product style. Workers at the suppliers in Italy and Portugal are covered by national or regional Collective Bargaining Agreements. Nudie Jeans uses the FWF Wage Ladder to analyse the wage levels in an audited factory.

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: Payment below minimum wage of a worker at a Turkish supplier has been remediated.

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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1.15 Degree to which affiliate assesses root causes of wages lower than living wages with suppliers	Supply chain approach	Sustained progress towards living wages requires adjustments to affiliates' policies.	Wage ladders, correspondence with supplier, other relevant documentation.
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Recommendation: FWF encourages Nudie Jeans to continue with its active role to and further strengthen their approach towards living wages. By avoiding the concept of a one-time charitable contribution, FWF strongly recommends affiliates to commit to a long term process that leads to sustainable implementation of living wages.

Comment: Most of Nudie Jeans' production comes from factories in low risk countries where wages are negotiated through a collective bargaining agreement. At one of its suppliers in India, Nudie Jeans supports movement towards living wages through agreeing on a price increase for their order. A local NGO monitored the payment of the price increase to workers.

Additional comments on Purchasing Practices:

Nudie Jeans no longer uses abrasive blasting in their denim production.

2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
Total % of own production under monitoring	99%	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.
2.2 Degree of progress towards resolution of existing Corrective Action Plans	An in-depth effort has been made to address most or all 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.

Comment: Nudie Jeans has a strong system to address corrective actions from audits. It examines problems they may have contributed to and analyses to which extent their buying practices should be adjusted. Status of findings are monitored in a systematic approach with efforts that are coordinated between different staff that have influence over supply chain conditions. Meaningful documentation was shown of follow up actions taken by Nudie Jeans in addition to demonstrated understanding of relevant issues by using FWF instruments.

2.3 Percentage of production volume from suppliers that have been visited by the affiliate in the past financial year	97%	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: 97% of all suppliers visited. Nudie Jeans staff discusses labour conditions during the visits. Outcomes of the meetings are documented.

2.4 Existing audit reports are collected	Yes and quality assessed	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: Nudie Jeans has collected existing reports from among others BSCI and assessed the quality. Identifying existing reports is always part of the selection of new suppliers.

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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2.6 A structured approach is used to address issues that occur at multiple suppliers	Yes	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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Comment: Nudie Jeans has systematic regional approach where it comes to the low risk production countries Italy and Portugal. Common, re-occurring problems are addressed for multiple suppliers. A local auditor is hired to audit the factories. The CSR manager travels with purchasing staff when visiting suppliers to always address social compliance issues related to their purchasing practices. The efforts in India extend to different stages further down the supply chain such as at spinning and dyeing locations. Complex issues such as living wage are taken on step by step.

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 chances 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: Nudie Jeans is actively cooperating with other members when it comes to audits, complaint etc. The company's efforts towards implementing living wages took place at a supplier with several other FWF members. Nudie Jeans actively attempted to convince and involve others to take part.

2.8 Monitoring requirements are fulfilled for production in low-risk countries	Yes	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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Comment: Suppliers in low risk countries are frequently visited and inform about FWF requirements. Nudie Jeans works with an independent auditor who conducts audits in Portugal and Italy. Labour conditions at suppliers who Nudie Jeans works with through agents are actively monitored by these agents.

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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Additional comments on Monitoring and Remediation:

Nudie Jeans does not distinguish between low and high risk and integrates the same monitoring requirements throughout its supply chain.

3. COMPLAINTS HANDLING

BASIC MEASUREMENTS	RESULT	COMMENTS
Number of worker complaints received since last check	1	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	1	

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.
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.
3.3 Percentage of audited factories where at least half of workers are aware of the FWF worker helpline	24%	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.

Recommendation: It is important that the affiliate informs the factory managers about the existence of the hotline. The factory managers are the key actors in informing workers about their rights. Nudie Jeans can stimulate its suppliers to participate in WEP trainings, to raise awareness about the existence and the functioning of FWF's worker hotline.

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Comment: The audits conducted by FWF teams in Turkey and Tunisia, showed most interviewed workers were not aware of the FWF Code of Labour Practices.

3.4 All complaints received from factory workers are addressed in accordance with the FWF Complaints Procedure	Yes	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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Recommendation: The buying agent of the factory has initiated a programme to increase productivity. They require the factory to make all the workers registered to social security, to provide AGI for all the workers, and to make all the workers enjoy their right to annual leave. The programme is expected to start in January or February, which means improvements will be made soon.

Comment: One complaint was submitted by a worker at a Turkish supplier. The worker indicated workers were forced to sign for annual leave without actually taking leave. Nudie Jeans adequately responded to the complaint; the report can be found here: <http://www.fairwear.org/ul/cms/fck-uploaded/documents/complaints/2012/complaintturkeynudiejeansJuly2012updateAugust2013.pdf>

3.5 Cooperation with other customers in addressing worker complaints at shared suppliers	Information sharing	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: During 'kick off session' all staff is informed of FWF membership through a presentation. Sales staff also receive a training regarding FWF membership. Nudie Jeans staff have regular meetings with purchasing, product development and CSR staff to discuss status of improvement at supplier level.

4.2 Advanced training is provided to staff in direct contact with suppliers on CoLP requirements	No	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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4.3 Agents are informed of CoLP requirements and act to support their implementation	Yes, and agents actively support implementation of the CoLP	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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Comment: Nudie Jeans works with agents who actively support implementation of the CoLP. They are closely involved in the monitoring process and extensively trained on social compliance issues.

4.4 Factory participation in Workplace Education Programme (where WEP is offered; by production volume)	66%	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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Requirement: 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 developed the Workplace Education Programme in 4 priority countries and is currently extending the programme to other countries such as Romania. The affiliate should motivate its main supplier(s) to join WEP trainings.

Comment: Nudie Jeans had one vertical supplier in India enrolled in the WEP factory trainings. Given that the majority of its suppliers are from low risk countries, this represents 66% of the volume in countries where WEP is offered.

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: In areas where the Workplace Education Programme is not yet offered, FWF recommends affiliates to arrange trainings on their own in order to further adhere social dialogue and communication between employers and workers in the workplace.

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: FWF was able to verify Nudie Jeans' supplier register through its annual statements, including subcontractors.

financial overview total fob? and view invoice of agents.

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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Comment: Staff responsible for purchasing has access to information on social compliance of suppliers. Nudie Jeans' CSR manager is integrated in purchasing/product development department and has regular meetings with regards to code implementation and supplier selection.

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: Nudie Jeans is required to place the FWF logo on its website (can be black/white version as well).

Comment: Communication about FWF membership is line with the FWF policy. However, the logo is missing.

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.
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.

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.
7.2 Percentage of required changes from previous Brand Performance Check implemented by affiliate	75%	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.

Comment: 3 out of 4 requirements from previous performance check have been improved:
 Nudie Jeans has adjusted its policy regarding abrasive blasting, it has made efforts towards informing subcontractors, the CoLP is now posted at the suppliers where it was missing.

RECOMMENDATIONS TO FWF

Nudie Jeans would in favor of an open sourcing database where brands can see if a supplier is working with other FWF members.

Nudie Jeans would appreciate a questionnaire for low risk suppliers and subcontractors and a different way of presenting the worker information sheet.