

# **BRAND PERFORMANCE CHECK**

# Stanley and Stella S.A.

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:

16-12-2013

## Conducted by:

Juliette Li and Rosan van Wolveren

## Interviews with:

Jean Chabert, Managing Director Bruno van Steenberghe, Sourcing and Sustainability Manager Audrey Bacherius, Communication Manager Bernard Deconinck, Sales Manager Europe Marie Kuza, Customer Service Manager

### 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:	Brussels
Member since:	15-12-2011
Product types:	Promotional, Printwear
Production in countries where FWF is active:	Bangladesh, Romania, Turkey
Production in other countries:	
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	100%

## Summary:

As a new member joining FWF in December 2011, Stanley & Stella met FWF's basic requirements in its first year of FWF membership. The company monitored 100% of it total turnover, which is above the requirement of auditing 40% during the first year.

Stanley & Stella has actively involved its suppliers to monitor and improve working conditions. It works with a small number of suppliers and commits to long-term working relationships.

Stanley & Stella is encouraged to involved more suppliers to the workplace education programme and make more effort to inform workers about FWF's complaints mechanism.

## **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	82%	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.
1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years	100%	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.

**Comment:** Stanley and Stella is a new company, started less than 5 years ago. Current suppliers of Stanley and Stella have worked with them since the beginning of the company. FWF recognised the relationships of the brand with their suppliers as stable.

1.3 Labour conditions are considered when selecting new suppliers	es Including labour conditions considera supports responsible business practice	<b>3</b> 11
		process; e.g. checklists for buyers, emails, etc.

**Comment:** 90 % of the products of Stanley and Stella are made of organic materials. There is no wide choice of factories where the brand can produce. Before placing an order, Stanley and Stella will investigate the labour situation in the specific factory and the country where the factory is located. In August 2012, Stanley & Stella established a local liaison office in Bangladesh. Monitor working conditions and identifying new suppliers are part of the duties of the local office.

Stanley & Stella believes that the philosophy of a business determines the commitment on sustainability and willingness to make continuous improvement. The philosophy and current working conditions of the suppliers thus have become two important criteria when choosing a new factory.

The company has selected only factories that have been audited before on social compliance. The new suppliers have all been asked to commit to the FWF Code of Labour Practices. The sourcing and CSR manager visited new factories to conduct a simple visual inspection before placing the orders.

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: Questionnaires have been collected of all the suppliers used in the past year.

1.5 Company conducts audits at all new Yes suppliers before placing orders	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:** Stanley & Stella has conducted an audit at a potential supplier in Bangladesh before committing to a business relationship. It might not always be possible to audit a factory before placing an order. However it is a company procedure that a new factory will be audited during the first 6 months of working relation.

1.6 Affiliate sources from an FWF factory	No		Supplier register
member		members. The small number of factories in the programme means	provided by affiliate.
		sourcing from FWF factory members cannot be a requirement.	

**Recommendation**: Stanley & Stella could contact FWF factory members to find out if it is possible to produce there.

1.7 Percentage of production volume from factories owned by the affiliate	· · · · · · · · · · · · · · · · · · ·	Supplier register provided by affiliate.
	CoLP violations.	

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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**Requirement:** A systematic approach is required to integrate social compliance into business processes, and supports good decision-making. The approach needs to ensure that the affiliate consistently evaluates the entire supplier base and includes information into decision-making procedures.

**Comment:** Stanley and Stella has integrated social compliance into its business processes. The company monitors the situations at the suppliers, while it has not yet a rating system to compare the suppliers.

Requirement:

**Recommendation**: Stanley & Stella is a new member of FWF. It is at the stage of identifying best way to mitigate risks and remediate problems in the supply chain. Stanley & Stella is encouraged to improve its production planning process to reduce overtime in the next two years.

**Comment:** Quality and safety are the most important factors for Stanley & Stella's production. It forecasts production planning to all suppliers. The company uses standard lead times when placing orders so that suppliers can easily estimate delivery time. To avoid excessive OT and air shipment, Stanley & Stella also allows some flexibility especially when it comes to basic designs for stock. A penalty for late shipment is only applied when the delay is more than two weeks.

the FWF worker helpline.	1.10 Percentage of production volume from suppliers where excessive overtime is found by FWF	13%	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.	
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**Requirement:** Stanley & Stella should have knowledge on which of the brand's sourcing practice is/are risk factor for excessive overtime. The affiliate should manage those factors and actively contribute to reduce excessive overtime at its suppliers.

**Recommendation**: Stanley and Stella could discuss with the factory management causes of excessive overtime and provide support to manage 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:** FWF audits done at the supplier in Turkey and at a new supplier that will be added to the supplier register for Stanley and Stella in 2013 show that excessive overtime was found. Both audit reports show that legal minimum wage and overtime premiums are paid to the workers.

1.11 Degree to which affiliate analyses and mitigates root causes of excessive overtime	Preventive 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**: Local staff in Bangladesh could be helpfull to tackle more difficult issues mentioned in the corrective action plans. It is recommended to do a root cause analysis for the suppliers in Bangladesh to investigate causes of excessive overtime and possible solutions. Issues to consider are improvement of productivity, improvement of production planning, improvement of human resource management and needed changes in the purchasing practices. In addition to reducing overtime, the company should discuss with the suppliers on possible steps to reduce the gap with living wage benchmarks.



**Comment:** Stanley and Stella has discussed overtime issues with one of their suppliers in Bangladesh. It is not always possible for Stanley and Stella to avoid overtime due to low volume. Factories said that retailers with fast changing collections usually contribute to excessive overtime in the factories. If the factory informs Stanley & Stella in time about their tight planning schedule, Stanley & Stella can help to re-arrange its order to reduce overtime. This is because Stanley & Stella is not dependent on trends and fast changing collections.

Local staff in Bangladesh is giving input and guidance to factories on productivity and efficiency. Good ideas from one factory can be transfer to another whenever possible.

1.12 Affiliate's pricing policy allows for	Policy at a	The first step towards ensuring the payment of minimum wages - and	Formal systems to
payment of at least the legal minimum	country level	towards implementation of living wages - is to know the labour costs	calculate labour
wages in production countries		of garments.	costs on per-product
			or country/city level.

**Comment:** Factories are quite transparent to Stanley & Stella concerning pricing calumniation. Stanley & Stella does not use standard minute labour cost to determine price. It requires factories to be transparent on material cost and Cut-Made-Trim cost. It allows a certain profit margin for the suppliers.

This means that there is information on the labour cost input per product. As there is no information on labour cost per product, it does not give insight on how to achieve payment of living wages.

1.13 Affiliate actively responds if suppliers fail to pay legal minimum wages		lier fails to pay minimum wage, FWF affiliates are expected nanagement of the supplier accountable for respecting local w.	Complaint reports, CAPs, additional emails, FWF audit reports or other documents that show minimum wage issue is reported/resolved.
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Comment: All suppliers audited have paid minimum wages.



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.
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, correspondance with supplier, other relevant documentation.

**Recommendation**: FWF encourages the affiliate to discuss with suppliers about possibilities to work towards higher benchmarks. FWF has developed experience with approaches that ensure that production workers in the selected facility take full benefit from the additional amounts that are committed to wage increases. FWF could give companies specific guidance on process rollout on request.

FWF advises companies to avoid the concept of a one-time charitable contribution, and strongly recommends affiliates commit to a long term process that leads to sustainable implementation of living wages.

In case FWF members are interested to develop a joint approach to improve wages at a shared supplier, FWF is in the position to give advice on measures that need to be taken by the affiliates to ensure compliance with anti-trust/anti-competition legislation in relevant jurisdictions.

**Comment:** Supplier of Stanley & Stella pays more than minimum wages in Bangladesh. Stanley & Stella will continue with this supplier to support its effort. Stanley & Stella is not able to increase their product price significantly, otherwise it might be less competitive in the market.

The brand is in discussion with its supplier in Turkey on living wages. The supplier in Turkey was resistant due to low profit margin.

## 2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
Total % of own production under monitoring	100%	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:** Stanley and Stella has opened their own local office in Bangladesh in August 2012. Stanley and Stella underlines the importance of a local office to monitor working conditions.

2.2 Degree of progress towards resolution of existing Corrective Action Plans been made to address most or all CAPs		Documentation of remediation and followup actions taken by affiliate.
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**Comment:** The Sourcing and CSR manager together with the persons in the local office in Bangladesh are working on the follow up after audits. Stanley and Stella first prioritise the Corrective Actions and always discuss the findings of the audit report with their suppliers.

2.3 Percentage of production volume from 100% suppliers that have been visited by the affiliate in the past financial year	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:** Stanley and Stella visits their suppliers on a regular basis. The CSR and sourcing person visits their factories 6-8 times a year.

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:** The company has selected only factories that have been audited before on social compliance and has collected existing audit reports.

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:** The Sourcing and CSR manager together with the persons in the local office in Bangladesh are working on the follow up after audits. Stanley & Stella prioritise the Corrective Actions and always discuss the findings of the audit report with the suppliers.

2.6 A structured approach is used to address issues that occur at multiple suppliers	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). WEP training are free of cost in India, China, Bangladesh and Turkey. The WEP training in Bangladesh will be an good starting point to work on sexual harassment in Bangladesh and India.

**Comment:** Stanley & Stella usually makes itself aware of risks of its production locations. As a new member, Stanley & Stella has already made a good effort to avoid subcontractors and maintaining certain level of control over labour conditions.

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	Shared CAPs, evidence of cooperation with
soppliers		same issue with multiple customers.	other customers.

**Recommendation**: Cooperation among costumers increases leverage, the chances of successful outcomes and long term improvements. A first step can be identifying other clients and their commitment to improving working conditions.

**Comment**: The company is open to cooperate with other customers of manufacturers regarding monitoring and the execution of Corrective Action Plans and has contacted already other FWF affiliates to agree on this.

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2.8 Monitoring requirements are fulfilled for production in low-risk countries	No production in lowrisk countries	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.
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.
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	0	
Number of worker complaints resolved since last check	0	

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: The CSR manager is responsible for complaints.

3.2 System exists to check that the Worker Information Sheet is posted in factoriesYesThe 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: Local office and the head quarter of Stanley & Stella have a procedure to follow up on complaints.

3.3 Percentage of audited factories where at least half of workers are aware of the FWF worker helpline	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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**Requirement:** The affiliate should check if the worker information sheet is posted. The information sheet is the first step towards awareness raising about the existence and functioning of FWFs worker hotline.

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.

**Recommendation**: The affiliate can stimulate its suppliers to participate in WEP trainings, to raise awareness about the existence and the functioning of FWF's worker helpline.

**Comment:** Most workers in the Turkish supplier knows about FWF and its Code of Labour Practices. The supplier is a participant of FWF's workplace education programme.

The new supplier in Bangladesh did not inform workers about the Code of Labour Practices.

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.
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.

# 4. TRAINING AND CAPACITY BUILDING

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION
4.1 Staff at affiliate is made aware of FWF membership requirements	Уes	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:** Staff of Stanley and Stella is sufficiently informed about FWF membership and the implementation of the Code of Labour Practices. Each new employee gets a training of the Sourcing and CSR manager on sustainability in general, mentioning the implications of FWF membership. A power point presentation is used for this purpose and was shared during the Brand Performance Check. All employees receive the FWF Code of Labour Practices.

In addition, social compliance is also discussed in internal meetings and staff is informed by mail on recent developments. For example an update was sent to all staff on the news of factory fire in Bangladesh.

4.2 Advanced training is provided to staff in direct contact with suppliers on CoLP requirements	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: Local office staff of Stanley & Stella have advanced training on implementation of CoLP.

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)	34%	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:** Their supplier and its workers in Turkey participated in the FWF training programme to improve dialogue at the factory level. The factory was invited to WEP by another FWF affiliate with which they share the supplier. The audit after the training was completed showing significant improvements and interviews with workers confirmed dialogue has improved.

4.5 Factory participation in trainings (where WEP is not offered; by production volume)	, D	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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# 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.
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.

**Comment:** Social compliance in the factories is discussed in internal meetings and staff is informed by mail on recent developments. For example an update was sent to all staff on the recent factory fire in Bangladesh, and on the prison labour found at one of the FWF affiliates.

## 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.

**Comment:** The member company informs its customers and the public about its FWF membership through its catalog in which FWF membership is mentioned, with the FWF logo and a short description. In the showroom of the company the FWF logo is posted in a visible place.

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.

**Comment:** Stanley & Stella shared audit reports with its current customers. It has not yet published its audit reports online.

6.3 Social Report is submitted to FWF and is	Yes	The Social Report is an important tool for brands to transparently share	Report adheres to
published on affiliate's website		their efforts with stakeholders.	FWF guidelines for
			Social Report content.

Comment: Social report is published on the web page.

# 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:** The company evaluates the implementation of the FWF code at several meetings a year, with involvement of the managing director.

7.2 Percentage of required 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. 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: This is the first BPC for STanley & Stella.

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## **RECOMMENDATIONS TO FWF**

Stanley & Stella suggested that FWF should use supplier ID instead of names in audit reports. That would make it possible for the company to be more transparent and publish audit reports.

Stanley & Stella suggested that FWF should use unique registration number for members in order to make sure only legitimate bodies can use the logo.