



BRAND PERFORMANCE CHECK

Triaz GmbH

PUBLICATION DATE: FEBRUARY 2014

this report covers the evaluation period 01-09-2011 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:

09-10-2013

Conducted by:

Stefanie Santila Karl

Interviews with:

Barbara Engel (PR & Sustainability Management Textiles)

Hannah Leicht (Assistance Sustainability Management Textiles)

Katharina Hupfer (Brand Manager Waschbaer, member of Board and Head of Purchasing Triaz Group)

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:	Freiburg im Breisgau
Member since:	01-09-2011
Product types:	Fashion
Production in countries where FWF is active:	Romania, Turkey, India, Bulgaria, China
Production in other countries:	Spain, Bosnia and Herzegovina, Germany, Czech Republic
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	52%

Summary:

FWF conducted the first Brand Performance Check at Triaz in September 2012. Beginning of 2013, FWF has decided to change evaluation of FWF affiliates from moment of joining to financial year of the affiliate. Triaz' financial year equals the calendar year. Since January to September 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 Triaz in October to December 2012.

The company Triaz Group sells textiles with their own labels vivanda, waschbaer, minibaer and pranahaus (approx. 40 per cent of total turnover) as well as other brand labels. Triaz Group meets FWF management system requirements for the first year of membership. Triaz has been affiliated to FWF for 1.5 years. Besides FWF membership, Triaz is certified by Global Organic Textile Standard (GOTS).

In it's first year of FWF membership, Triaz has informed customers, competitors and suppliers in several ways about its commitment to decent working conditions. Together with FWF, purchasing staff and employees in customer relation have been trained on social standards. First monitoring and verification audits have been conducted, implementation started. Complaints received have been handled in a professional manner. Until now Triaz has a factory approach when it comes to monitoring and remediation. Challenge for the coming years will be to find a strategic way to solve issues on a root cause basis.

1. PURCHASING PRACTICES

BASIC MEASUREMENTS	RESULT	COMMENTS
Percentage of production in low-risk countries	17%	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	77%	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: Triaz has good leverage at most of its production sites.

1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years	92%	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: Triaz has long-lasting supplier relationship with its suppliers which is higher than 90%.

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: Before placing a first order at a potential new supplier, the production site is visited by the head of purchasing.

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: Triaz shares FWF information in written and requests the supplier to fill in the questionnaire on social standards and to sign the Code of Labour Practice (CoLP) before first orders are placed. There are three sheets a supplier has to sign before production can take place at a new site: purchasing conditions, article pass and FWF requirements (questionnaire).

Additionally, production sites have to answer whether the production is done in-house or subcontracted. In case production is subcontracted the production site has to claim what production processes are concerned, they need to name the subcontractors and also name contact details. The subcontractors also have to agree to the FWF Code of Labour Practice.

1.5 Company conducts audits at all new suppliers before placing orders	No	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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Recommendation: It is recommended to conduct an audit at new suppliers before placing production orders to assess risks for CoLP violations. Creating a FWF Wage Ladder to assess the level of wages can be part of the risk assessment. FWF suggests affiliates to select suppliers that are willing to cooperate on improvements.

Comment: No pre-audits are done before production starts.

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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Comment: More than 50% of the textiles sold at Triaz come from external suppliers. One of the external suppliers is a FWF affiliate, the factory where more than 90% of their garments come from is a FWF factory member.

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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Recommendation: FWF supports direct ownership of suppliers. Owning a supplier provides clear accountability for and direct influence over working conditions. It reduces the risk of unexpected CoLP violations.

Comment: None of the production volume comes from factories owned by the affiliate.

1.8 Supplier compliance with Code of Labour Practices is evaluated in a systemic manner	No	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 normal 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: Within the first year of membership Triaz concentrated on systemizing and structurally organizing the status of working conditions at existing suppliers. There is no system in place where grading suppliers and social compliance is a criterion. However, the person responsible for social standards is working together closely with the purchasing department and regular updates on each supplier are shared.

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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Recommendation: FWF recommends a pro-active production planning system: The production planning system should be designed to reduce/prevent excessive overtime at a systematic level. Strong integrated systems should e.g. help to limit the effects of peaks in demand.

Comment: Delivery times in general are three months for the first order, two for re-orders. Triaz considers the availability of the material in the market before fixing delivery dates. Delivery delays are accepted regularly without any deduction. Once a style is set, the supplier receives all information on how to produce the article.

1.10 Percentage of production volume from suppliers where excessive overtime is found by FWF	31%	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: The affiliate should have knowledge on which of the brand's sourcing practice is/are risk factor(s) for excessive overtime. The affiliate should manage those factors and actively contribute to reduce excessive overtime at its suppliers. In addition, overtime should be voluntary and with advance notice, suppliers transparent with FWF auditors on its overtime records.

Comment: Three audits have been carried out by FWF teams in the evaluation period in Romania, Turkey and China. Whereas the audits in Turkey and China showed excessive overtime, this was no issue at the factory in Romania. At the factory in Turkey, overtime was in addition involuntary and the systems at the factory intransparent.

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: It is recommended that the affiliate conducts a brand level research on the contributing factories of overtime in production factories that have found practicing excessive overtime. The affiliate should identify strategies to minimise the impact of its sourcing practice on excessive OT at the factories.

Comment: Triaz assesses the root cause of overtime with 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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Comment: The price itself is calculated by each supplier for each article. The purchasing staff checks the price given by the supplier and usually agrees to the suppliers' offer. For Triaz a stable relationship with the supplier is more important than the best price. Many suppliers receive pre-payments to finance the material. Triaz has made an overview including country level data with details on minimum wages and living wage estimates.

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: During the FWF audit in Turkey, it was found out that the supplier pays to some workers below legal minimum wage. To ensure payments above minimum wage, Triaz and the factory have worked together with a local consultant. To verify that minimum wage is paid, the document's inspector of the FWF audit team went seeing the factory again. During this visit, the document's inspector was also able to get reliable data to produce a FWF wage ladder. This was not possible during the audit due to intransparent systems which have been now established in a transparent manner.

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: None of the audits showed late payments to supplier by affiliate.

1.15 Degree to which affiliate assesses root causes of wages lower than living wages with suppliers	Basic approach	Sustained progress towards living wages requires adjustments to affiliates' policies.	Wage ladders, correspondance with supplier, other relevant documentation.
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Recommendation: FWF encourages the affiliate to assess the hypothetical cost effects of increasing wages towards benchmarks that are included in the wage ladder. To support companies in this process FWF has developed a calculation model that estimates the effect on FOB and retail prices under different pricing models. FWF can be of help upon request.

Comment: All three FWF audit reports showed that wages paid are below estimates of living wage by local stakeholders. Payment of living wage has been addressed explicitly with factory management again using the FWF wage ladder made for the audit reports.

Additional comments on Purchasing Practices:

Social standards are taken into account when terminating a business relationship. This happened once within the first year of FWF membership. Plans to terminate business relationship due to non-compliance have been clearly communicated to the supplier well in advance. As this particular supplier refused to sign the Code of Labour Practice, the business relationship was formally terminated. Triaz then stated that the impossibility to work on social standards was one of the factors in this decision.

Triaz has a clear position and written agreement with suppliers to not use sandblasting in jeans-production. Not using the technique of sandblasting is checked with each article pass for jeans where the supplier has to sign that sandblasting is not used during production process. Triaz is working to find a way on how to get further insights to the making of jeans for further prevention possibilities.

2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
Total % of own production under monitoring		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: Triaz has designated staff to follow up on problems identified by the 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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Recommendation: Besides doing audits once in 3 years, the affiliate could consider:

- Hire local consultant to assist factory in developing an action plan and to assist factory management in investigating root causes.
- Organise supplier seminars.
- Provide factory training.
- Share knowledge/material.

Comment: All corrective actions have been discussed with the supplier and a time frame set with factory management. The correction of findings is regularly checked via email and phone and personal visits at the production site by either personal for social standards or head of purchasing.

2.3 Percentage of production volume from suppliers that have been visited by the affiliate in the past financial year	79%	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: Existing suppliers are visited on a yearly basis by the head of purchasing and also social standards responsible. Suppliers are on top regularly invited to Triaz in Freiburg, Germany.

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: Existing audit reports have been collected from all suppliers. The FWF audit quality assessment tool helped to evaluate the quality of other organization's audits. Until now, Triaz did not find one audit report which is of same quality as those of FWF but used findings mentioned in existing audit reports to work towards remediation together with the factories.

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 reports are shared with factory management after the report is received from FWF. Together with the supplier Triaz establishes improvement timelines in a timely manner and re-checks with FWF audit teams in case issues in the audit report or CAP are not clear.

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).

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: Triaz welcomes to share working experience and audit reports with other customers no matter whether the other is FWF affiliate or not. This does count with regard to social standards as well as e.g. sourcing efficiency of material.

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: Triaz makes no differentiation with regard to the production country when it comes to sharing information about FWF and also signing the CoLP.

2.9 External brands resold by the affiliate who have completed and returned the external brand questionnaire. (% of external sales volume)	95%	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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Comment: External suppliers (products where other brands labels are used) have to sign the questionnaire on social standards and the responsible for social standards had a personal talk on social standards which each of the external supplier. Further, existing audit reports on social standards have been requested. External suppliers have to be as transparent with regard to production site information and data as own suppliers.

2.10 External brands resold by affiliates that are members of another credible initiative. (% of external sales volume)	2%	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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Requirement: The Affiliate has to ensure that suppliers of external production are either a FWF member or have another acceptable system in place for monitoring its supply chain.

Comment: Only a small amount of Triaz turnover at external suppliers is sourced from brand affiliated to FWF and FLA. Knowing this, Triaz has plans to audit production sites of external suppliers in addition to own suppliers.

3. COMPLAINTS HANDLING

BASIC MEASUREMENTS	RESULT	COMMENTS
Number of worker complaints received since last check	3	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	1	
Number of worker complaints resolved since last check	2	

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: Triaz has a designated person to handle complaints of workers. There is an internal procedure on paper on how to handle complaints.

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: Whether the Code of Labour Practice is hung up at the production sites is checked by requesting pictures of the hung up document and during regular visits by staff, intermediaries or agents. Checks include whether the information sheet for workers contain the correct complaints handler phone numbers.

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: The affiliate can stimulate its suppliers to participate in WEP trainings, to raise awareness about the existence and the functioning of FWF's worker hotline as well as how grievance mechanisms can function.

Comment: Two of the three audit reports showed that the CoLP has been hung up at the production sites and that management and workers were informed about the Code of Labour Practices. However, none of the factories could proof the audit team to have a functioning grievance mechanism.

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: FWF recommends to conduct a root causes analysis to prevent the problems from recurring.

Comment: In it's first 1.5 years of affiliation to FWF Triaz has received three complaints (China, Turkey, Germany). All three complaints were admissible as they referred to the FWF CoLP, but only one grounded. The complaints received from factory workers have been addressed in accordance with the FWF with the FWF Complaints Procedure.

3.5 Cooperation with other customers in addressing worker complaints at shared suppliers	Active cooperation	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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Comment: On complaint which has been received came from a production site shared with two more FWF affiliates. Triaz has taken the lead solving the complaint as their share of production is highest among the three brands.

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: The CEO, purchasing staff and staff with customer relations have been trained in group sessions on how FWF works and what to look for when visiting production sites. A hand-out describing FWF work was given to the attendees.

Triaz posted information about FWF, the eight labour standards and the FWF office number (in case of complaints) two times within the premises of the FWF affiliate. Also this information has been spread via intranet. Triaz staff can find detailed information about FWF itself, audit report findings and details on current complaints and complaints handling. Important updates such as audit report findings and implementation status or e.g. complaints are sent via email to all concerning colleagues.

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: A training to the purchasing staff was conducted by FWF at Triaz premises in October 2012. The half day training included practical tips and tricks on how to implement and follow up CAPs at the production sites.

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: Agents and intermediaries have been systematically informed about FWF and the plan of Triaz to join FWF well before the company actually became a FWF affiliate. All of them have been informed in written and during personal meetings. One training was given to Triaz biggest agency in Turkey with special focus on social standards. Agents are responsible to help Triaz with factory communication, filling in the questionnaire and implementation of corrective actions due to audits or complaints.

4.4 Factory participation in Workplace Education Programme (where WEP is offered; by production volume)	65%	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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Comment: Two production sites of Triaz joined the Workplace Education Programme. The factories production is in China and in Turkey. After the trainings in Turkey, the worker representatives were democratically elected and functionality of the committee was followed up and assisted by FWF. In China, factory management and workers were trained on grievance mechanisms.

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: 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.

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: Triaz has a designated person who is responsible for the supplier register. The supplier register submitted is well ordered and contains detailed information on all suppliers.

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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Recommendation: A formal system where information regarding code compliance is integrated in the overall assessment of the supplier is recommended.

Comment: Triaz has no formal system where information regarding code compliance is integrated in the overall assessment of the supplier. However the responsible for social standards is located in the same office as the purchasing and all information is directly shared on an informal but up-to-date way.

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: Triaz has informed the public about its FWF membership online at their websites and in their catalogues. A press release was published when joining FWF. Further, Triaz has supported an event called “runners’ world” where they have sponsored t-shirts at five different events. A banner with FWF information and logo was shown. Employees working during such events were explicitly trained on FWF requirements. FWF has been mentioned within a newsletter sent to customers. Fair Wear Foundation information is displayed on the company’s website. A short and brief description of FWF’s work is given.

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.
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Recommendation: FWF recommends the affiliate to publish one or more of the following reports on its website: Brand performance check, Audit Reports, suppliers register. Good reporting by members helps to ensure the transparency of the affiliate and FWF’s work.

Comment: Until now, Triaz does not engage in advanced reporting activities.

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: The Social Report is well structured and gives information in a transparent manner. The Social Report is submitted to FWF and is published on Triaz's website.

7. EVALUATION

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION
7.1 Systemic annual evaluation of FWF membership is conducted with involvement of top management	No	An annual evaluation involving top management ensures that FWF policies are integrated into the structure of the company.	Meeting minutes, verbal reporting, Powerpoints, etc.

Recommendation: The affiliate should conduct an annual evaluation involving top management that ensures FWF policies are integrated into the structure of the company. Evaluation should include input from relevant external stakeholders and feedback from suppliers.

Comment: Until now there is no meeting where evaluation of working conditions at suppliers plays a role.

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 Brand Performance Check conducted at Triaz.

There have hence been no requirements to be included from a previous check. FWF will check implementation of requirements from the Brand Performance Check during the next check beginning of 2014.

Additional comments on Evaluation:

Triaz collects feedback from agents and manufacturers to evaluate the implementation of CoLP from all suppliers regularly.

RECOMMENDATIONS TO FWF

Triaz experienced bad working conditions at a site in Germany and therefore asks FWF to have a clear low-risk policy and also high requirements for production in low-risk countries.

Triaz sees a high importance to work on social standards along the whole supply chain and would appreciate steps from FWF to achieve this in the long run.

FWF offers two communication brochures in German which FWF affiliates can use communicating FWF to customers. While Triaz sees one of the brochures as too complicated and too expensive, the FWF affiliate sees the other as not enough to well inform customers. Triaz would appreciate communication material in German balanced between the two options available for now.