



# BRAND PERFORMANCE CHECK

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De Berkel B.V.

PUBLICATION DATE: JULY 2014

this report covers the evaluation period 01-01-2013 to 31-12-2013

## ABOUT THE BRAND PERFORMANCE CHECK

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

FWF's Brand Performance Check is a tool to evaluate and report on the activities of FWF's affiliate members. The Checks examine how affiliate management systems support FWF's Code of Labour Practices.

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

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

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

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

## BRAND PERFORMANCE CHECK OVERVIEW

De Berkel B.V.

Evaluation Period: 01-01-2013 to 31-12-2013

| AFFILIATE INFORMATION   |  |
|---|--|
| Headquarters:   | Varsseveld, Netherlands                            |
| Member since:   | 29-06-2007   |
| Product types:  | Workwear   |
| Production in countries where FWF is active:                            | China, India, Lithuania, Poland, Ukraine, Viet Nam |
| Production in other countries:  | Republic of Moldova                                |
| BASIC REQUIREMENTS  |  |
| Workplan for this evaluation period 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                                    | 76%  |
| Benchmarking score  | 55   |
| Category  | Good   |

## Summary:

De Berkel meets most of FWF's management system requirements. Its sourcing and monitoring practices support effective implementation of the FWF Code of Labour Practices. One major supplier was last audited in 2010, leading to a monitoring percentage of 76% - lower than the required 90% for a brand at 3+ years of membership. In light of the unusually intensive and supportive work done on corrective actions with this supplier, however, FWF has awarded De Berkel 'Good' status for 2013.

The company has stable business relationships with its main suppliers and has been able to remediate several important corrective actions. This has been particularly successful given that a majority of the suppliers produce exclusively for De Berkel and the company has substantial leverage to request improvements in working conditions.

Given the close relationships and high leverage of De Berkel, FWF expects De Berkel to make further progress in improving findings of existing Corrective Action Plans. A small percentage (below 2%) of De Berkel's purchasing volume is sourced from suppliers in India, China and Vietnam where ready-made products are sourced through an agent. The level of working conditions at those suppliers is not assessed and monitored in a systemic manner. De Berkel must publish its social report on its website.

## PERFORMANCE CATEGORY OVERVIEW

**Leader:** This category is for affiliates who are doing exceptionally well, and are operating at an advanced level.

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

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

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

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

## 1. PURCHASING PRACTICES

| PERFORMANCE INDICATORS  | RESULT | RELEVANCE OF INDICATOR  | DOCUMENTATION                               | SCORE | MAX | MIN |
|---|--------|---|---|-------|-----|-----|
| 1.1 Percentage of production volume from suppliers where affiliate buys at least 10% of production capacity | 97%    | Affiliates with less than 10% of a factories' production capacity generally have limited influence on factory managers to make changes. | Supplier information provided by affiliate. | 4     | 4   | 0   |

Comment: Three of De Berkel's main suppliers produce exclusively for De Berkel. The remaining 3 suppliers in Europe, produce more than half of its capacity for De Berkel. This gives the company substantial leverage to effectively request improvements in working conditions.

|  |     |  |   |   |   |   |
|--|-----|--|---|---|---|---|
| 1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years | 76% | Stable business relationships support most aspects of the Code of Labour Practices, and give factories a reason to invest in improving working conditions. | Supplier information provided by affiliate. | 4 | 4 | 0 |
|--|-----|--|---|---|---|---|

Comment: 76% of De Berkel's 2013 purchasing volume comes from suppliers where a business relationship has existed for at least 5 years. In fact, De Berkel works with its main suppliers for over 20 years.

|  |                  |   |                           |     |   |   |
|--|------------------|---|---------------------------|-----|---|---|
| 1.3 All new suppliers are required to sign and return the Code of Labour Practices before first orders are placed. | No new suppliers | 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. | N/A | 2 | 0 |
|--|------------------|---|---------------------------|-----|---|---|

Comment: No new suppliers were selected in 2013.

|   |                  |   |   |     |   |   |
|---|------------------|---|---|-----|---|---|
| 1.4 Company conducts human rights due diligence at all new suppliers before placing orders. | No new suppliers | Due diligence helps to identify, prevent and mitigate potential human rights problems at new suppliers. | Documentation may include pre-audits, existing audits, other types of risk assessments. | N/A | 4 | 0 |
|---|------------------|---|---|-----|---|---|

Comment: No new suppliers were selected in 2013

|  |     |  |   |   |   |   |
|--|-----|--|---|---|---|---|
| 1.5 Supplier compliance with Code of Labour Practices is evaluated in a systematic manner. | Yes | A systemic approach is required to integrate social compliance into normal business processes, and supports good decisionmaking. | Documentation of systemic approach: rating systems, checklists, databases, etc. | 1 | 2 | 0 |
|--|-----|--|---|---|---|---|

**Recommendation:** FWF recommends De Berkel to systematically include labour conditions and the willingness of suppliers to improve labour conditions in their evaluation system. Particularly considering assessing compliance at the suppliers in China, India and Vietnam.

**Comment:** In prolonging individual contracts with suppliers, sections are included about compliance with social standards, including agreed improvement plans. However, De Berkel has an additional grading system to evaluate suppliers on several criteria where labour conditions are not systematically included.

|   |                                      |   |   |   |   |   |
|---|--------------------------------------|---|---|---|---|---|
| 1.6 The affiliate's production planning systems support reasonable working hours. | Strong, integrated systems in place. | Affiliate production planning systems can have a significant impact on the levels of excessive overtime at factories. | Documentation of robust planning systems. | 4 | 4 | 0 |
|---|--------------------------------------|---|---|---|---|---|

**Comment:** De Berkel's production planning system is established in close cooperation with its suppliers. Stable capacity forecasts over a long period of time are shared with the factories; by receiving continuous orders from De Berkel, the factories are able to plan capacity accordingly and make long term agreements with their employees. De Berkel has control over delivery times of fabric and material. The company is able to plan the exact number of minutes per week; particularly at suppliers that produce solely for De Berkel, the company can calculate the capacity in minutes per product type by the number of workers in the factory. Delivery times of De Berkel are flexible; including half a week tolerance before shipment. Shipment takes place every week, but delays do not cause major problems for the company.

|  |                      |  |   |   |   |   |
|--|----------------------|--|---|---|---|---|
| 1.7 Degree to which affiliate mitigates root causes of excessive overtime. | Intermediate efforts | Some production delays are outside of the control of affiliates; however there are a number of steps that can be taken to address production delays without resorting to excessive overtime. | Documentation of root cause analysis and positive steps taken to manage production delays or improve factory processes. | 3 | 6 | 0 |
|--|----------------------|--|---|---|---|---|

**Recommendation:** De Berkel is expected to study the findings in the audit reports regarding working hours; transparency and correct payment. In addition, De Berkel could investigate their production planning and lead times in relation to the working hours.

**Comment:** Audits conducted by FWF did not find excessive overtime. One audit concluded overtime hours were not properly documented. Whereas the audit team verified through worker interviews that overtime was not excessive, it could not conclude whether overtime hours were compensated correctly. A second audit showed management indicated the delivery times of De Berkel were in some cases too tight; low productivity made it difficult to reach the quota which could lead to overtime hours.

|  |                    |  |  |   |   |   |
|--|--------------------|--|--|---|---|---|
| 1.8 Affiliate's pricing policy allows for payment of at least the legal minimum wages in production countries. | Style-level policy | The first step towards ensuring the payment of minimum wages - and towards implementation of living wages - is to know the labour costs of garments. | Formal systems to calculate labour costs on per-product or country/city level. | 4 | 4 | 0 |
|--|--------------------|--|--|---|---|---|

**Requirement:** Despite the low volume, De Berkel should also know the labour cost of garments in the Asian production countries and analyse wage levels in those countries as well.

**Comment:** De Berkel works with standard minutes. Calculations for pricing per minute are based on sampling done at De Berkel. Routines per style are set in cooperation with suppliers including the time used per working station in order to calculate the piece rates. The piece rates for workers in factories allow compliance with legal minimum wages. Minimum wages in the low risk countries Poland and Lithuania are guaranteed by local institutions such as the labour inspection. De Berkel is in process of adjusting the production systems at its own factory in a way to better suit smaller orders with variations in style. This way, workers can perform better and receive higher payment.

|   |                                   |  |   |   |   |    |
|---|-----------------------------------|--|---|---|---|----|
| 1.9 Affiliate actively responds if suppliers fail to pay legal minimum wages. | No minimum wage problems reported | 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. | 2 | 2 | -2 |
|---|-----------------------------------|--|---|---|---|----|

|   |    |  |  |   |   |    |
|---|----|--|--|---|---|----|
| 1.10 Evidence of late payments to suppliers by affiliate. | No | Late payments to suppliers can have a negative impact on factories and their ability to pay workers on time. Most garment workers have minimal savings, and even a brief delay in payments can cause serious problems. | Based on a complaint or audit report; review of factory and affiliate financial documents. | 0 | 0 | -1 |
|---|----|--|--|---|---|----|

|   |                        |   |  |   |   |   |
|---|------------------------|---|--|---|---|---|
| 1.11 Degree to which affiliate assesses root causes of wages lower than living wages with suppliers and takes steps towards the implementation of living wages. | Factory-level approach | Sustained progress towards living wages requires adjustments to affiliates' policies. | Documentation of policy assessments and/or concrete progress towards living wages. | 4 | 8 | 0 |
|---|------------------------|---|--|---|---|---|

Comment: Business contracts between De Berkel and suppliers establish among others the capacity and prices. De Berkel works on improving productivity of factories by investing in machinery and training workers to manage style variations and small orders. Performance of workers is linked to their payment. De Berkel supports workers to improve their skills. However, two audits indicated prices of De Berkel did not increase for several years and do not support the payment of living wages.

|  |    |   |   |     |   |   |
|--|----|---|---|-----|---|---|
| 1.12 Affiliate sources from an FWF factory member. | No | When possible, FWF encourages affiliates to source from FWF factory members. On account of the small number of factories this is a 'bonus' indicator. Extra points are possible, but the indicator will not negatively affect an affiliate's score. | Supplier information provided by affiliate. | N/A | 1 | 0 |
|--|----|---|---|-----|---|---|

|   |     |   |   |   |   |   |
|---|-----|---|---|---|---|---|
| 1.13 Percentage of production volume from factories owned by the affiliate. | 44% | Owning a supplier increases the accountability and reduces the risk of unexpected CoLP violations. Given these advantages, this is a bonus indicator. Extra points are possible, but the indicator will not negatively affect an affiliate's score. | Supplier information provided by affiliate. | 1 | 2 | 0 |
|---|-----|---|---|---|---|---|

Comment: De Berkel owns two production locations in Ukraine and Moldova, and one sample factory in Poland.

## PURCHASING PRACTICES

Possible Points: 36

Earned Points: 27

Additional comments on Purchasing Practices:

## 2. MONITORING AND REMEDIATION

| BASIC MEASUREMENTS  | RESULT | COMMENTS   |
|---|--------|--|
| % of own production under standard monitoring (excluding low-risk countries)                          | 52%    |  |
| % of own production in low risk production countries where FWF's Low Risk policy has been implemented | 24%    | FWF low risk policy should be implemented. 0 = policy is not implemented correctly. N/A = no production in low risk countries. |
| Total of own production under monitoring  | 76%    | Minimums: 1 year: 40%; 2 years 60%; 3 years+: 90% Measured as a percentage of turnover.  |

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

Comment: All staff in contact with suppliers is responsible for following up corrective action plans, including the production manager stationed in Moldova.

|   |              |   |   |   |   |    |
|---|--------------|---|---|---|---|----|
| 2.2 Degree of progress towards resolution of existing Corrective Action Plans | Intermediate | 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. | 4 | 8 | -2 |
|---|--------------|---|---|---|---|----|

**Recommendation:** Given the close relationship and high leverage De Berkel has at its suppliers and De Berkel being a long term FWF member, FWF expects De Berkel to realize improvements during its membership. To facilitate remediation, De Berkel could consider:

- Hire a 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.
- providing financial support to the supplier for implementing improvements

**Comment:** Several improvements were realized after previous audits. There were no serious findings regarding child labour, forced labour or discrimination. At one factory, workers showed increased awareness of labour rights, a worker representative was elected by workers, although the representative did not yet participate in negotiations with managements, and workers now had copies of their labour contracts. Another audit showed social security was improved. However, pending improvements include health and safety issues that have not been followed up, overtime not being paid correctly and the worker representative in this factory is at the same time chief of production not elected by workers. Low wages are an issue at both factories and at one factory management indicated they were not aware about the content of previous corrective action plans.

|   |     |   |  |   |   |   |
|---|-----|---|--|---|---|---|
| 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.  | 4 | 4 | 0 |
| 2.4 Existing audit reports from other sources are collected.  | No  | Existing reports form a basis for understanding the issues and strengths of a supplier, and reduces duplicative work.   | Audit reports are on file; evidence of followup on prior CAPs. Reports of quality assessments. | 0 | 3 | 0 |

**Recommendation:** Existing reports form a basis for understanding the issues and strengths of a supplier, and reduces double work. Existing audits can be counted towards the monitoring threshold if the quality of the report is assessed using the FWF audit quality tool and corrective actions are implemented.

**Comment:** The supplier in India and Lithuania are SA8000 certified. De Berkel does not have access to these 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.                                 | 2   | 2 | -1 |
| 2.6 High risk issues specific to the affiliate's supply chain are identified and addressed by the monitoring system.                         | No high-risk issues | Different countries and products have different risks associated with them; monitoring systems should be adapted to allow appropriate human rights due diligence for the specific risks in each affiliates' supply chain.   | Documentation may take many forms; additional research, specific FWF project participation; extra monitoring activities, extra mitigation activities, etc. | N/A | 6 | 0  |

**Recommendation:** Given that production at the suppliers in China, India and Vietnam account for less than 2% of De Berkel's production volume, the monitoring criteria were mostly focused on the key suppliers. Despite the low volume, FWF recommends De Berkel to include the suppliers in their system to inform the suppliers and workers about the FWF Code of Labour Practices and the complaints handling procedure. In addition, risks need to be identified for those suppliers; particularly with regards to Sumangali in India and overtime and freedom of association in China and Vietnam.

|  |  |   |   |     |   |    |
|--|--|---|---|-----|---|----|
| 2.7 Affiliate cooperates with other customers in resolving corrective actions at shared suppliers  | No CAPs active or no shared suppliers. | Cooperation between customers increases leverage and chances of successful outcomes. Cooperation also reduces the changes of a factory having to conduct multiple Corrective Action Plans about the same issue with multiple customers. | Shared CAPs, evidence of cooperation with other customers.  | N/A | 2 | -1 |
| 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. | 2   | 2 | 0  |
| 2.9 External brands resold by the affiliate who have completed and returned the external brand questionnaire. (% of external sales volume) | 0%                                     | 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.   | 0   | 3 | 0  |

Requirement: De Berkel should receive a completed and returned questionnaire from external brands resold by the affiliate.

|   |    |   |   |   |   |   |
|---|----|---|---|---|---|---|
| 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. | 0 | 3 | 0 |
|---|----|---|---|---|---|---|

Comment: De Berkel sells goods of 3 FWF Affiliates.

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## MONITORING AND REMEDIATION

Possible Points: 27

Earned Points: 14

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### 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  | SCORE | MAX | MIN |
|--|--------|--|--|-------|-----|-----|
| 3.1 A specific employee has been designated to address worker complaints                                     | Yes    | Followup is a serious part of FWF membership, and cannot be successfully managed on an ad-hoc basis.   | Manuals, emails, etc., demonstrating who the designated staff person is.   | 1     | 1   | -1  |
| 3.2 System exists to check that the Worker Information Sheet is posted in factories                          | 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.   | 2     | 2   | 0   |
| 3.3 Percentage of FWF-audited factories where at least half of workers are aware of the FWF worker helpline. | 50%    | The FWF complaints procedure is a crucial element of verification. If factory-based complaint systems do not exist or do not work, the FWF worker helpline allows workers to ask questions about their rights and file complaints. Factory participation in the Workplace Education Programme also count towards this indicator. | Percentage of audited factories where at least 50% of interviewed workers indicate awareness of the FWF complaints mechanism + percentage of factories in WEP programme. | 3     | 4   | -2  |

Comment: One audited showed increased awareness of workers about their rights. The other audit showed workers were not aware. Factory policies and audit results were not shared with the workers.

|  |     |   |   |   |   |    |
|--|-----|---|---|---|---|----|
| 3.4 All complaints received from factory workers are addressed in accordance with the FWF Complaints Procedure | Yes | Providing access to remedy when problems arise is a key element of responsible supply chain management. Affiliate involvement is often essential to resolving issues. | Documentation that affiliate has completed all required steps in the complaints handling process. | 3 | 6 | -2 |
|--|-----|---|---|---|---|----|

Comment: De Berkel actively worked with one of their suppliers to solve a case regarding a worker who was injured when operating a button machine. The worker had filed a case in court, but through involvement of De Berkel and FWF, worker and management came to an agreement for compensation acceptable to both parties.  
<http://www.fairwear.org/ul/cms/fck-uploaded/documents/complaints/2013/ComplaintUkraineDeBerkeljuly2013.pdf>

|  |  |  |  |     |   |    |
|--|--|--|--|-----|---|----|
| 3.5 Cooperation with other customers in addressing worker complaints at shared suppliers | No complaints or cooperation not possible / necessary. | Because most factories supply several customers with products, involvement of other customers by the FWF affiliate can be critical in resolving a complaint at a supplier. | Documentation of joint efforts, e.g. emails, sharing of complaint data, etc. | N/A | 2 | -2 |
|--|--|--|--|-----|---|----|

## COMPLAINTS HANDLING

Possible Points: 13

Earned Points: 9

## 4. TRAINING AND CAPACITY BUILDING

| PERFORMANCE INDICATORS   | RESULT | RELEVANCE OF INDICATOR   | DOCUMENTATION   | SCORE | MAX | MIN |
|--|--------|--|---|-------|-----|-----|
| 4.1 All staff is made aware of FWF membership requirements   | Yes    | Preventing and remediating problems often requires the involvement of many different departments; making all staff aware of FWF membership requirements helps to support cross-departmental collaboration when needed. | Emails, trainings, presentation, newsletters, etc.                            | 1     | 1   | -1  |
| 4.2 Ongoing training in support of FWF requirements is provided to staff in direct contact with suppliers. | Yes    | Sourcing, purchasing and CSR staff at a minimum should possess the knowledge necessary to implement FWF requirements and advocate for change within their organisations.   | FWF Seminars or equivalent trainings provided; presentations, curricula, etc. | 2     | 2   | 0   |

Comment: De Berkel actively takes part in training opportunities FWF offers such as the FWF annual conference and webinars.

|  |     |   |   |   |   |    |
|--|-----|---|---|---|---|----|
| 4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices. | Yes | Agents have the potential to either support or disrupt CoLP implementation. It is the responsibility of affiliate to ensure agents actively support the implementation of the CoLP. | Correspondence with agents, trainings for agents, FWF audit findings. | 1 | 2 | -2 |
|--|-----|---|---|---|---|----|

Recommendation: De Berkel is advised to update agents they work with in Asia with FWF requirements and material.

|   |                            |  |  |     |   |   |
|---|----------------------------|--|--|-----|---|---|
| 4.4 Factory participation in Workplace Education Programme (where WEP is offered; by production volume) | No production in WEP areas | Lack of knowledge and skills on best practices related to labour standards is a common issue in factories. Good quality training of workers and managers is a key step towards sustainable improvements. | Documentation of relevant trainings; participation in Workplace Education Programme. | N/A | 6 | 0 |
|---|----------------------------|--|--|-----|---|---|

Comment: Given the low volume, it is currently not required to organize WEP trainings at those locations in China and India.

|   |    |  |   |   |   |   |
|---|----|--|---|---|---|---|
| 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 or work with other training-partners. Trainings must meet FWF quality standards to receive credit for this indicator. | Curricula, other documentation of training content, participation and outcomes. | 0 | 4 | 0 |
|---|----|--|---|---|---|---|

Recommendation: All factory workers should be informed about the labour standards and the process of monitoring and remediation. In order to further communication between employers and workers in the workplace FWF recommends affiliates to arrange trainings on their own in areas where the Workplace Education Programme is not yet offered.

Comment:

## TRAINING AND CAPACITY BUILDING

Possible Points: 9

Earned Points: 4

## 5. INFORMATION MANAGEMENT

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

**Requirement:** The supplier data of De Berkel must include all suppliers which have been involved in the creation of finished garments for De Berkel, including subcontractors of the suppliers in China/India/Vietnam.

|  |     |  |   |   |   |    |
|--|-----|--|---|---|---|----|
| 5.2 A system exists to allow purchasing, CSR and other relevant staff to share information with each other about working conditions at suppliers | Yes | CSR, purchasing and other staff who interact with suppliers need to be able to share information in order to establish a coherent and effective strategy for improvements. | Internal information system; status CAPs, reports of meetings of purchasing/CSR; systematic way of storing information. | 1 | 1 | -1 |
|--|-----|--|---|---|---|----|

## INFORMATION MANAGEMENT

Possible Points: 7

Earned Points: 4

## 6. TRANSPARENCY

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

**Comment:** De Berkel informs consumers and stakeholders about FWF membership on its website. Description of membership is in correct wording. Moreover, FWF membership and logo is used on business cards, letter heading, promotion material and catalogues. In some cases the old FWF logo was used. De Berkel will use the new logo in printed material.

|  |    |   |   |   |   |   |
|--|----|---|---|---|---|---|
| 6.2 Affiliate engages in advanced reporting activities | No | Good reporting by members helps to ensure the transparency of FWF's work and shares best practices with the industry. | Affiliate publishes one or more of the following on their website: Brand Performance Check, Audit Reports, Supplier List. | 0 | 1 | 0 |
|--|----|---|---|---|---|---|

**Recommendation:** FWF recommends to publish one or more of the following reports on its website: brand performance check, audit reports, supplier information. Good reporting by members helps to ensure the transparency of the affiliate and FWF's work.

|   |                                  |   |   |   |   |    |
|---|----------------------------------|---|---|---|---|----|
| 6.3 Social Report is submitted to FWF and is published on affiliate's website | Complete report submitted to FWF | The Social Report is an important tool for brands to transparently share their efforts with stakeholders. | Report adheres to FWF guidelines for Social Report content. | 1 | 2 | -2 |
|---|----------------------------------|---|---|---|---|----|

Requirement: FWF membership requires transparency on affiliates' work towards social standards. The social report needs to be submitted to FWF and published on affiliate's website.

Comment: The social report has not been published on De Berkel's website.

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## TRANSPARENCY

Possible Points: 4

Earned Points: 2

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## 7. EVALUATION

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

Comment: De Berkel evaluates FWF policies and membership regularly and at least once a year. Top management is involved in the evaluation.

|   |    |   |  |    |   |    |
|---|----|---|--|----|---|----|
| 7.2 Percentage of required changes from previous Brand Performance Check implemented by affiliate | 0% | 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. | -4 | 8 | -4 |
|---|----|---|--|----|---|----|

Requirement: De Berkel must follow up on the management system requirements of performance check reports.

Comment: Despite the low volume, De Berkel should include the Asian suppliers in their monitoring practices and sourcing decisions. De Berkel is in process of informing those suppliers of the CoLP and including them in the supplier data including subcontractors. De Berkel has not published the social report on its website.

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## EVALUATION

Possible Points: 10

Earned Points: -2

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## RECOMMENDATIONS TO FWF

De Berkel would appreciate a clearer 'certificate'/ proof of membership to be used in tenders.  
Communication material in French (acquisition brochure and CoLP) would support De Berkel's activities.  
De Berkel recommends FWF to find ways to lessen the paper burden on smaller companies.

## SCORING OVERVIEW

| CATEGORY                       | EARNED | POSSIBLE |
|--------------------------------|--------|----------|
| Purchasing Practices           | 27     | 36       |
| Monitoring and Remediation     | 14     | 27       |
| Complaints Handling            | 9      | 13       |
| Training and Capacity Building | 4      | 9        |
| Information Management         | 4      | 7        |
| Transparency                   | 2      | 4        |
| Evaluation                     | -2     | 10       |
| Totals:                        | 58     | 106      |

**BENCHMARKING SCORE (EARNED POINTS ÷ POSSIBLE POINTS)**

55

**PERFORMANCE BENCHMARKING CATEGORY**

Good

## BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

17-04-2014

Conducted by:

Annabel Meurs

Interviews with:

Wilfried Rasing (CFO)

Ronald Klunder (Production Manager)

Jan Ordelmans (Production Manager)

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.