



## BRAND PERFORMANCE CHECK

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De Berkel B.V.

PUBLICATION DATE: AUGUST 2015

this report covers the evaluation period 01-01-2014 to 31-12-2014

## ABOUT THE BRAND PERFORMANCE CHECK

Fair Wear Foundation believes that improving conditions for apparel factory workers requires change at many levels. Traditional efforts to improve conditions focus primarily on the factory. FWF, however, believes that the management decisions of 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. They evaluate the parts of affiliate supply chains where clothing is assembled. This is the most labour intensive part of garment supply chains, and where brands can have the most influence over working conditions.

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.

The Brand Performance Check system is designed to accommodate the range of structures and strengths that different companies have, and reflects the different ways that brands can support better working conditions.

This report is based on interviews with affiliate employees who play important roles in the management of supply chains, and a variety of documentation sources, financial records, supplier data. The findings from the Brand Performance Check are summarized and published at [www.fairwear.org](http://www.fairwear.org). The online [Brand Performance Check Guide](#) provides more information about the indicators.

## BRAND PERFORMANCE CHECK OVERVIEW

De Berkel B.V.

Evaluation Period: 01-01-2014 to 31-12-2014

AFFILIATE INFORMATION	
Headquarters:	Varsseveld, Netherlands
Member since:	29-06-2007
Product types:	Workwear
Production in countries where FWF is active:	China, India, Viet Nam
Production in other countries:	Lithuania, Moldova, Poland, Ukraine
BASIC REQUIREMENTS	
Workplan and projected production location data for upcoming year have been submitted?	Yes
Actual production location data for evaluation period was submitted?	Yes
Membership fee has been paid?	Yes
All suppliers have been notified of FWF membership?	Yes
SCORING OVERVIEW	
% of own production under monitoring	35%
Benchmarking score	53
Category	Needs Improvement

## Summary:

De Berkel met most FWF's management system requirements to improve working conditions. However, as no FWF audits took place in 2014, De Berkel monitored only 35% of its total purchasing volume, which is below the 90% required of brands in 3+ years of membership. With little active follow-up on previous audits, this places De Berkel in 'Needs Improvement'.

In 2014, 30% of its FOB purchasing volume came from production locations in Moldova and Ukraine owned by De Berkel. De Berkel enjoys stable relationship with all of its main suppliers. This, in addition to high leverage at its main suppliers, gives the company a strong basis for effectively improving working conditions. Taking this into account, FWF expects De Berkel to make further progress in improving working conditions as per existing Corrective Action Plans. In this regard, De Berkel is encouraged to assess root causes of wages lower than living wages at its suppliers and take steps towards the implementation of living wages.

A small percentage (4%) of De Berkel's purchasing volume is sourced from suppliers in India, China and Vietnam where finished garments are sourced through an agent. The status of working conditions, and the possible use of subcontractors, at those suppliers is not assessed and monitored in a systematic manner.

FWF encourages De Berkel to audit more of its suppliers in 2015 and bring its monitoring percentage above the 90% required from brands of 3+ years of membership. As a result, and combined with a sufficiently high benchmark score, De Berkel is expected to regain 'Good' status in 2016. In addition, De Berkel is expected to ensure that its external producers return the Fair Wear questionnaire and post the Code of Labour Practices. Finally, De Berkel is required to 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. Leaders show best practices in complex areas such as living wages and freedom of association.

**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	96%	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:** 96% of De Berkel's FOB purchasing volume is sourced from six main suppliers, where De Berkel buys more than 10% of their respective production capacity. Two of De Berkel's suppliers are owned by the Teamdress group, to which De Berkel belongs. 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	80%	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
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**Comment:** 80% of De Berkel's 2014 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 15 years.

1.3 All new suppliers are required to sign and return the Code of Labour Practices before first orders are placed.	No	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.	0	2	0
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**Requirement:** De Berkel needs to ensure that new suppliers sign and return the questionnaire before first orders are placed.

**Comment:** In 2014 De Berkel started production at a new supplier in Moldova. De Berkel owns 75% of the company, which is established as a joint venture between De Berkel and a local partner. The local partner is responsible for the daily working conditions at the factory. The COLP has not been signed thus far.

1.4 Company conducts human rights due diligence at all new suppliers before placing orders.	Yes	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.	4	4	0
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**Comment:** The supplier base of De Berkel is very stable. In 2014 De Berkel started with one new supplier in Moldova, which is 75% owned by De Berkel. A new location in the Ukraine is also being considered. The production manager visits potential new suppliers and conducts an assessment, which includes labour conditions.

1.5 Supplier compliance with Code of Labour Practices is evaluated in a systematic 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.	0	2	0
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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 De Berkel consistently evaluates the entire supplier base and includes information into decision-making procedures.

**Comment:** No systematic evaluation system is applied to monitor and assess the social compliance status and progress at its suppliers.

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
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**Comment:** De Berkel guarantees a number of production minutes at each of its suppliers. This is based on the available capacity within the factories. Given the high leverage at its main suppliers, De Berkel is able to make an accurate planning taking the production capacity of the respective supplier into account. A total of 2,000 production minutes per week (equivalent of some 33 hours) per sewing worker is taken as a basis for planning, which supports reasonable working hours.

When fabric is available at the supplier, De Berkel expects its suppliers to complete production in 5-6 weeks. According to De Berkel, this normally suffices given the relatively small order sizes.

1.7 Degree to which affiliate mitigates root causes of excessive overtime.	No production problems documented.	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.	N/A	6	0
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Comment: No audits have been conducted in 2014. Previous audits conducted by FWF did not find excessive overtime, which is in line with De Berkel's own observations.

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
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Recommendation: At a minimum, De Berkel is recommended to investigate wage levels in production countries, among others by making use of FWFs Wage Ladder and country studies. This is particularly important for the countries where De Berkel produces finished garments, such as production locations in Vietnam, China and India which are not owned by De Berkel. As an advanced step, increased transparency in costing and productivity gives insight in the labour costs per product. This forms the basis for ensuring enough is paid to cover at least minimum wage and for making steps towards living wages.

Comment: At De Berkel's own factories, workers receive a fixed salary during the first three months of employment. This fixed salary is based on the prevailing minimum wages. After three months, when the worker has achieved a higher degree of productivity, the worker receives a piece rate payment.

De Berkel works with standard minutes. Calculations for pricing per minute are based on sampling done at De Berkel. The piece rates for workers in factories allow for payment of at least legal minimum wages. De Berkel has basic understanding of the cost of living in production countries.



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

**Requirement:** De Berkel is expected to take an active role in discussing living wages with its suppliers. The FWF wage ladder can be used as a tool to implement living wages. Most relevant wage estimates, such as local minimum wage, Asia Floor Wage, collective bargaining wage and industrial best practice wages are provided in the wage ladder. The wage ladder is included in FWF's audit reports. It demonstrates the gaps between workers' wages at a factory and living wages demanded by major stakeholders. The wage ladder can be used to document, monitor, negotiate and evaluate the improvements at its suppliers. As De Berkel buys exclusively at - and owns some suppliers, it is more accountable for implementing adequate steps.

**Comment:** For its own production facilities, De Berkel receives information about what workers earn. De Berkel verifies that at least minimum wages are paid, but does not actively support the payment of living wages.

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 FWF audits conducted in 2013 found that 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.	30%	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. In addition, in 2014 De Berkel took a 75% share in a new factory in Moldova, which is established as a joint venture between De Berkel and a local partner.

## PURCHASING PRACTICES

Possible Points: 36

Earned Points: 27

## 2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	16%	
% of own production in low risk production countries where FWF's Low Risk policy has been implemented	19%	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	35%	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, in particular, 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
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Requirement: Resolving and remediating non-compliances is one of the most important actions FWF affiliates can do towards improving working conditions. FWF expects De Berkel to examine and support remediation of any problem that they encounter.

Comment: No audits took place in 2014. De Berkel followed-up on corrective actions from 2013 audits. Due to a change of staff at De Berkel, the status of corrective actions, however, is not clear as proper documentation on follow-up is not available.

2.3 Percentage of production volume from suppliers that have been visited by the affiliate in the past financial year	80%	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
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**Recommendation:** Annual visits should be made for production sites (including subcontractors and production locations in low-risk countries). Regular visits provide the opportunities to discuss problems and corrective actions in the time period between formal audits.

**Comment:** The CMT production locations in Moldova and Ukraine, for which De Berkel purchases fabric and trims, are visited regularly by De Berkel's production manager. The suppliers in China, India and Lithuania, where De Berkel sources the finished garments (i.e. the supplier is also responsible for fabric/trims sourcing) have not been visited by De Berkel in 2014.

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
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**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:** De Berkel does not request existing third-party audit reports for any of its suppliers, including the ones in Asia.

2.5 Audit Report and Corrective Action Plan (CAP) findings are shared with factory. Improvement timelines are established in a timely manner	Yes	2 part indicator: FWF audit reports were shared and discussed with suppliers within two months of audit receipt AND a reasonable time frame was 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.	Intermediate Capacity	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.	3	6	0

**Recommendation:** Given that production at the suppliers in China, India and Vietnam account for only 4% of De Berkel's FOB purchasing volume, the monitoring efforts were mostly focused on the key suppliers in Moldova and the Ukraine. Despite the low volume, FWF recommends De Berkel to include the suppliers in its monitoring 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.

2.6a High risk issues specific to Bangladesh are identified and addressed by the monitoring system and remediation activities.	Not sourcing in Bangladesh	Affiliates sourcing in Bangladesh should take additional action to address both building and fire safety and the prevention of violence against women.	Building, electrical and fire safety inspection reports, evidence of cooperation with other customers sourcing at the same factories (Accord signatories and/or FWF affiliates), etc.	N/A	3	0
2.6b High risk issues specific to Myanmar are identified and addressed by the monitoring system and remediation activities.	Not sourcing in Myanmar	Myanmar is still in the process of establishing the legal and civil society infrastructure needed to ensure compliance with labour rights. Extra care must be taken when doing business in Myanmar.	Shared CAPs, Wage Ladders per factory.	N/A	3	0
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)	4%	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
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Requirement: De Berkel should request completed questionnaires from all the external brands resold by De Berkel.

Comment: De Berkel has thus far not systematically requested external brands to complete the FWF questionnaire.

2.10 External brands resold by affiliates that are members of another credible initiative. (% of external sales volume)	0%	FWF believes affiliates who resell products should be rewarded for choosing to stock external brands who also take their supply chain responsibilities seriously.	External production data in FWF's information management system. Documentation of sales volumes of products made by FWF or FLA members.	0	3	0
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Comment: De Berkels sells finished garments of one other FWF affiliate, which accouts for less than 1% of the total FOB purchasing volume of external producers.

## MONITORING AND REMEDIATION

Possible Points: 33

Earned Points: 17

### 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	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

**Recommendation:** It is suggested to ask suppliers to submit a photo of the posted Worker Information Sheet and to ask staff visiting a supplier to check if the documents are still posted as indicated on the obtained photo.

**Comment:** The production manager based in Moldova is responsible to verify that the COLP is posted.



3.3 Percentage of FWF-audited factories where at least half of workers are aware of the FWF worker helpline.	No audits done or no FWF helpline available	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.	N/A	4	-2
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**Requirement:** De Berkel should have a routine to ensure the worker information sheet with complaints handlers contact details is posted in a place freely accessible to workers. The information sheet is the first step towards awareness raising about the existence and functioning of FWFs worker hotline.

**Comment:** No audits were conducted in 2014. One factory audited in 2013 showed increased awareness of workers about their rights. The other audit in 2013 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	No complaints received	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.	N/A	6	-2
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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
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## COMPLAINTS HANDLING

Possible Points: 3

Earned Points: 3

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## 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

**Comment:** Most staff within De Berkel has understanding of FWF. In order to improve this further, De Berkel plans to arrange an internal training to create better awareness among all staff about FWF membership and requirements.

4.2 Ongoing training in support of FWF requirements is provided to staff in direct contact with suppliers.	No	Sourcing, purchasing and CSR staff at a minimum should possess the knowledge necessary to implement FWF requirements and advocate for change within their organisations.	FWF Seminars or equivalent trainings provided; presentations, curricula, etc.	0	2	0
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**Recommendation:** De Berkel could do more to disseminate information on FWF requirements to all staff in direct contact with suppliers, including the production manager based in Moldova.

**Comment:** De Berkel actively took 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
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**Recommendation:** De Berkel is advised to update agents they work with in Asia with FWF requirements and material to ensure agents actively support the implementation of the CoLP.

**Comment:** De Berkel uses agents for factories in Asia where they produce finished garments. Agents are informed of the FWF COLP, but the extent in which the agent actively supports implementation of the COLP is unclear, particularly as no audits have been conducted at these suppliers.

4.4 Factory participation in Workplace Education Programme (where WEP is offered; by production volume)	0%	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.	0	6	0
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**Recommendation:** In order to ensure awareness and enhance understanding of the relevant labour standards, grievance mechanisms and the importance of a good mechanism for communication between employers and workers in the workplace, FWF developed the Workplace Education Programme. This programme is offered for free in the four priority countries (including China and India). De Berkel should motivate its suppliers to join WEP trainings.

**Comment:** De Berkel sources 4% of its 2014 FOB purchasing volume from suppliers in India and China.

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
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**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

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## TRAINING AND CAPACITY BUILDING

Possible Points: 15

Earned Points: 2

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## 5. INFORMATION MANAGEMENT

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
5.1 Level of effort to identify all production locations	Intermediate	Any improvements to supply chains require affiliates to first know all of their 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 register 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.

**Comment:** De Berkel has no knowledge of the (possible) use of subcontractors by its suppliers in China, India and Vietnam, collectively accounting for 4% of De Berkel's 2014 purchasing volume.

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
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## INFORMATION MANAGEMENT

Possible Points: 7

Earned Points: 4

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## 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 communicates about FWF through the company website, social report, letterhead and the company catalogue. Membership is described in correct wording. 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
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Recommendation: FWF recommends De Berkel 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 affiliates to transparently share their efforts with stakeholders.	Report adheres to FWF guidelines for Social Report content.	1	2	-2
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Requirement: FWF approach 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. De Berkel plans to make the supplier names anonymous in the social report and then publish it on its 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:** There is no formal annual evaluation, as FWF membership is considered an integral part of its regular work. However, the brand performance check report is a yearly moment to discuss FWF requirements and draw lessons for future improvement.

7.2 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. Progress on achieving these requirements is an important part of FWF membership and its process approach.	Affiliate should show documentation related to the specific requirements made in the previous Brand Performance Check.	-2	4	-2
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**Requirement:** It is required to work towards remediation of previous requirements from the last Brand Performance Check. Further engagement needs to be taken with regard to the following requirements mentioned in the last Brand Performance Check:

- (i) De Berkel should know the labour cost of garments in the Asian production countries and analyse wage levels in those countries.
- (ii) De Berkel should receive a completed questionnaires from external brands resold by the affiliate.
- (iii) The supplier data of De Berkel must include all suppliers which have been involved in the creation of finished garments including subcontractors of its suppliers in China/India/Vietnam.
- (iv) The social report needs to be submitted to FWF and published on affiliate's website.

Comment: De Berkel has little to no knowledge on labour costs and wage levels in the Asia production countries (India, China, Vietnam). It also has no information on the possible use of subcontractors at these suppliers. Questionnaires from external brands are not collected systematically. The social report is not published at its website.

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## EVALUATION

Possible Points: 6

Earned Points: 0

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## RECOMMENDATIONS TO FWF

N/A

## SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	27	36
Monitoring and Remediation	17	33
Complaints Handling	3	3
Training and Capacity Building	2	15
Information Management	4	7
Transparency	2	4
Evaluation	0	6
Totals:	55	104

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

53

PERFORMANCE BENCHMARKING CATEGORY

Needs Improvement

## BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

07-07-2015

Conducted by:

Koen Oosterom

Interviews with:

Wilfried Rasing (CFO)

Ronald Klunder (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.