

BRAND PERFORMANCE CHECK

Heigo Nederland B.V.

PUBLICATION DATE: SEPTEMBER 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. The <u>Brand Performance Check Guide</u> provides more information about the indicators and is available for download.

BRAND PERFORMANCE CHECK OVERVIEW

Heigo Nederland B.V.

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

| AFFILIATE INFORMATION | |
|---|--|
| Headquarters: | Elst (Gld), Netherlands |
| Member since: | 01-10-2005 |
| Product types: | Workwear |
| Production in countries where FWF is active: | Bulgaria, China, India, Portugal, Turkey |
| Production in other countries: | Belgium, Hungary, Netherlands, Pakistan |
| 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 | 74% |
| Benchmarking score | 49 |
| Category | Needs Improvement |

Summary:

Heigo has shown insufficient progress towards in implementing FWFs management system requirements. With a monitoring percentage of 74% and low-risk country monitoring requirements that were not met, it has not achieved the required monitoring percentage of 90%.

Heigo has one large factory located in Bulgaria that it owns and monitors closely, but does not monitor the working conditions of factories located in other (high-risk) countries. For this reason, FWF recommends that Heigo monitor the working conditions of factories located in high-risk countries as well.

Heigo received one complaint in 2013 that was resolved effectively.

FWF also recommends Heigo to ensure that the Code of Labour Practices is posted in all of its factories, a requirement from last year's Brand Performance Check.

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 | 77% | 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: In 2013, Heigo purchased about 77% of its production volume from suppliers where it buys at least 10% of production capacity.

| 1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years | 91% | Stable business relationships support most aspects of the Code of Labour Practices, and give factories a reason to invest in improving | Supplier information provided by affiliate. | 4 | 4 | 0 |
|--|-----|--|---|---|---|---|
| | | working conditions. | | | | |

Comment: Approximately 91% of Heigo's production volume comes from suppliers where a business relationship has existed for at least five 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 |
|--|------------------|---|---|-----|---|---|
| 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 |

Requirement: A formal process should exist to evaluate the risks of labour violations in the production areas the affiliate is operating. This evaluation should influence the decision on whether to place orders, how to prevent and mitigate risks, and what remediation steps may be necessary.

Recommendation: A risk analysis as part of the decision-making process of selecting new suppliers is an important step to mitigate risk and prevent potential problems. FWF recommends Heigo to assess the risks associated with operating in specific production areas. FWF advises to use information from FWF country studies and wage ladders. Heigo can cooperate with local stakeholders to further investigate the situation in a specific country. FWF can offer information on local stakeholders.

FWF also encourages Heigo to visit any (potential) new suppliers in order to get a better impression of the working conditions there.

Comment: In 2013, no new suppliers were selected. In general, however, an informal system is in place to conduct human rights due diligence. Heigo looks to see if the potential new supplier is familiar with FWF. In addition to this, Heigo looks to see what other clients produce at the factory. Heigo believes that this gives a good indication of how the factory works and what the conditions are.

Depending on the size of the order, Heigo visits the potential new supplier or not.

| 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: Heigo is encouraged to develop an evaluation/grading system for suppliers where compliance with labour standards is a criterion for future order placement. Part of the system can be to create an incentive for rewarding suppliers for realised improvements in working conditions.

Comment: Heigo visits the largest supplier at least 4 times a year and relies on word of mouth and existing audits for the other factories. It does not reward suppliers for labour conditions performance improvement.

| 1.6 The affiliate's production planning sustems support reasonable working hours. | General or ad-hoc | Affiliate production planning systems can have a significant impact on the levels of | Documentation of robust planning | 2 | 4 | 0 |
|---|-------------------|--|----------------------------------|---|---|---|
| -9 | system. | excessive overtime at factories. | systems. | | | |

Recommendation: A good production planning system needs to be established for all factories based on the production capacity for regular working hours.

Comment: Heigo's account managers keep in touch with clients and stay up to date on the products in the warehouse. Based on this, Heigo works with a detailed sales forecast that results in a production masterplan for the coming 3-6 months. Heigo also works to ensure that the materials are delivered on time to the production locations. Its main production location in Bulgaria has 6-8 weeks for production. In this factory, overtime occurs only rarely.

For the other factories, the factories themselves provide the delivery times. Heigo does not know whether these delivery times are based on regular working hours or overtime hours.

| 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 | |
|--|-------------------------|--|---|---|---|---|--|
|--|-------------------------|--|---|---|---|---|--|

Requirement: Heigo should investigate to what extent its current buying practices has an effect on the working hours at supplier level. A root cause analysis of excessive overtime should be done to investigate which steps can be most effective to reduce overtime.

Comment: In 2013, there was 1 instance of excessive overtime in its production location in Bulgaria. In response to this, Heigo undertook extensive and specific actions to mitigate and prevent future instances of excessive overtime.

In its other production locations, Heigo is not aware of whether overtime is an issue despite these factories being located in countries with high risks related to overtime.

| 1.8 Affiliate's pricing policy allows for payment of at least the legal minimum wages in production countries. | Country-level policy | The first step towards ensuring the payment of minimum wages - and towards implementation of living wages - is to know | Formal systems to calculate labour costs on per-product | 2 | 4 | 0 |
|--|----------------------|--|---|---|---|---|
| wages in production coonties. | | , , | or country/city level. | | | |

Recommendation: At a minimum, affiliates are recommended to investigate wages levels in all production countries, among others by making use of FWFs Wage Ladder and country studies. 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: Heigo is aware of the labour costs for its factory located in Bulgaria, but is not aware of the labour costs for the other production locations.

| 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. | Basic approach | Sustained progress towards living wages requires adjustments to affiliates' policies. | Documentation of policy assessments and/or concrete progress towards living wages. | 2 | 8 | 0 |

Recommendation: Heigo 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.

FWF encourages Heigo 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.

Comment: Heigo currently only consults the wage ladder as part of the audit and CAP follow-up for its most important supplier.

| 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. | 74% | 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. | 2 | 2 | 0 |

Comment: Almost 75% of Heigo's production volume comes from a factory that it owns.

PURCHASING PRACTICES

Possible Points: 36

Earned Points: 22

2. MONITORING AND REMEDIATION

| BASIC MEASUREMENTS | RESULT | COMMENTS |
|---|--------|--|
| % of own production under standard monitoring (excluding low-risk countries) | 74% | |
| % of own production in low risk production countries where FWF's Low Risk policy has been implemented | 0% | 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 | 74% | 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 |
| 2.2 Degree of progress towards resolution of existing Corrective Action Plans | Advanced | 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. | 8 | 8 | -2 |

Comment: Heigo had one audit in 2013 for its largest supplier. In this factory, that is also owned by Heigo, it has undertaken significant steps towards resolution of outstanding issues.

| 2.3 Percentage of production volume from suppliers that have been visited by the affiliate in the past financial year | 75% | 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 |
|---|-----|---|---|---|---|---|
|---|-----|---|---|---|---|---|

Comment: Heigo visited approximately more than 75% of its production volume in 2013.

| 2.4 Existing audit reports from other sources are collected. | 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. | 1 | 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: Heigo has collected existing audit reports for other sources but has not (yet) assessed the quality of these audit reports.

| 2.5 Audit Report and Corrective Action Plan (CAP) findings are shared with factory. Improvement timelines are established in a timely manner | Yes | FWF audit reports should be shared and discussed with suppliers within two months of audit receipt. Timely sharing of information and agreement on corrective actions is essential for improvement. A reasonable time frame should be specified for resolving findings. | Corrective Action Plans, emails; findings of followup audits; brand representative present during audit exit meeting, etc. | 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 adapated 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: Knowing the country specific risks facilitates the starting point for discussing this with suppliers. Heigo can agree on additional commitments that are required to mitigate risks. The affiliate can provide additional measures for support and integrate that in the monitoring system.

Comment: Heigo is well aware of the high risk issues related to its factory in Bulgaria but does not address high risk social compliance issues related to its other factories in other countries.

| 2.7 Affiliate cooperates with other customers in resolving corrective actions at shared suppliers No C/ active shared suppliers | leverage and chances of successful outcomes. Cooperation also reduces the changes of a | chared CAPs, N/A vidence of cooperation with ther customers. | 2 | -1 |
|--|--|--|---|----|
|--|--|--|---|----|

Comment: In 2014, there will be a combined audit of one of its other factories.

| questionnaires. |
|-----------------|
|-----------------|

Requirement: Monitoring requirements need to be fulfilled for production in low-risk countries in order for it to be counted towards the monitoring threshold. All production sites in low-risk countries must:

- Be visited at least annually by affiliate representatives;
- Be informed of FWF membership and return the completed CoLP questionnaire before production orders are placed;
- Post the FWF Worker Information Sheet in local languages.

Comment: Monitoring requirements for low-risk countries were not fulfilled in 2013.

| 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 | |
|--|----|--|-----------------------------|---|---|---|--|
|--|----|--|-----------------------------|---|---|---|--|

Comment: FWF was unable to verify what percentage of Heigo's external brands completed and returned the questionnaire.

| 2.10 External brands resold by affiliates that are members of another credible initiative. (% of external sales volume) | 10% | 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: Approximately 10% of Heigo external production is produced by FWF members or another credible initiative.

MONITORING AND REMEDIATION

Possible Points: 33

Earned Points: 20

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 | | |

| 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 | No | 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. | 0 | 2 | 0 |

Requirement: Heigo must ensure that the Code of Labour Practices, including contact information of the local complaints handler of FWF, is posted in factories in a location that is accessible to workers. Affiliate should check by means of a visit whether the CoLP is posted in the factories.

Comment: In 2013, no system was in place to ensure that the Worker Information Sheets were posted in the factories.

| 3.3 Percentage of FWF-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. 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. | 4 | 4 | -2 | |
|--|------|--|--|---|---|----|--|
|--|------|--|--|---|---|----|--|

Comment: One audit was conducted in 2013, and this audit showed that workers were aware of the FWF worker helpline.

| 3.4 All complaints received from factory workers are addressed in accordance with the FWF Complaints Procedure | Yes + Preventive steps taken | 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. | 6 | 6 | -2 | |
|--|------------------------------------|---|---|---|---|----|--|
|--|------------------------------------|---|---|---|---|----|--|

Comment: Heigo received one complaint in 2013 related to excessive overtime. This complaint was handled appropriately and preventive steps were taken.

| 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: 11

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: Heigo staff regularly attends FWF events such as the Annual Conference.

| 4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices. | Affiliate does not use agents | Agents have the potential to either support or disrupt CoLP implementation. It is the responsibility of affiliate to ensure agents actively support the implementation of the CoLP. | Correspondence with agents, trainings for agents, FWF audit findings. | N/A | 2 | -2 |
|---|-------------------------------------|---|--|-----|---|----|
| 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 acommon 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 |

Requirement: Manufacturers and their workers should be systematically informed about FWF and the implementation of the Code of Labour Practices. All factory management and workers should be informed and aware about the relevant labour standards and grievance mechanisms.

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 in the 4 priority countries. The affiliate should motivate its main supplier(s) to join WEP trainings.

Comment: Heigo has not had any of its suppliers take part in the WEP program.

| 4.5 Factory participation in trainings (where WEP is not offered; by production volume) | 0% | arrange trainings on their own or work with other training-partners. Trainings must meet FWF quality standards to receive credit for this | Curricula, other documentation of training content, participation and outcomes. | 0 | 4 | 0 | |
|---|----|---|---|---|---|---|--|
| | | indicator. | ootcomes. | | | | |

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 ensure suppliers participate in trainings. Trainings must meet FWF quality standards to receive credit for this indicator: top management, supervisors and workers should be included in the trainings, separately. Workplace standards and dispute handling should be included in the training. At least 10-20% of the workforce must be trained, depending on the size of the factory. Worker participations should be balanced and representative.

Comment: Heigo has not undertaken any training sessions for its factories located in countries where WEPs are not available.

TRAINING AND CAPACITY BUILDING

Possible Points: 13

Earned Points: 3

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 |

Recommendation: Heigo is advised to develop a systematic approach to complete the supplier list. Part of the approach can be:

- 1) automatically include information from audit reports and complaints
- 2) Business relationships with agents include transparency of production locations.
- 3) Agreements with factories on the use of subcontractors stating clearly that when subcontractors are used, they are included in the monitoring system and information is shared on the subcontracted production process.

The supplier register of the previous financial year has to be complete and accurate; production locations of all suppliers must be listed, including subcontractors.

Correct FOB percentages should be given per supplier to show the relevance of each supplier in relation to the affiliate's total purchasing volume. These can be calculated on the basis of payments made during the previous financial year.

The affiliate is asked to notify FWF as soon as possible in case unknown subcontractors are discovered.

Comment: Heigo is aware of its production locations and updates this in the database. It is, however, unaware if there are any (potential) subcontractors that produce for it.

| 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 | |
|--|-----|--|---|---|---|----|--|
|--|-----|--|---|---|---|----|--|

Comment: Heigo has an internal server that allows all necessary people to have access to information about working conditions at suppliers.

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 | No | 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. | -2 | 1 | -2 |

Requirement: FWF membership should be communicated according to the FWF communications policy.

Comment: Heigo makes use of on-garment communication without fulfilling the necessary requirements.

| 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 the affiliate 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.

Comment: Heigo currently does not engage in advanced reporting activities.

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

Comment: Heigo has submitted its Social Report 2013 to FWF.

TRANSPARENCY

Possible Points: 4

Earned Points: -1

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 |
| 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: It is required to work towards remediation of previous requirements from the last Brand Performance Check. Further stepds need to be taken with regard to the following requirements mentioned in the last Brand Performance Check.

Comment: Heigo did not implement the required changes from the previous Brand Performance Check that was related to ensuring that the monitoring requirements for low-risk countries were completed. In addition, Heigo still does not fully adhere to the FWF communications guidelines.

EVALUATION

Possible Points: 10

Earned Points: -2

RECOMMENDATIONS TO FWF

FWF should work on making itself and its work more known among Dutch companies as Heigo feels there are a lot of companies not yet aware of FWF and its activities.

SCORING OVERVIEW

| CATEGORY | EARNED | POSSIBLE |
|--------------------------------|--------|----------|
| Purchasing Practices | 22 | 36 |
| Monitoring and Remediation | 20 | 33 |
| Complaints Handling | 11 | 13 |
| Training and Capacity Building | 3 | 13 |
| Information Management | 4 | 7 |
| Transparency | -1 | 4 |
| Evaluation | -2 | 10 |
| Totals: | 57 | 116 |

BENCHMARKING SCORE (EARNED POINTS + POSSIBLE POINTS)

49

PERFORMANCE BENCHMARKING CATEGORY

Needs Improvement

BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

15-07-2014

Conducted by:

Kees Gootjes

Interviews with:

Piet Goossens, Director Dennis van Aalten, Head Internal Affairs

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.