

BRAND PERFORMANCE CHECK

Kwintet AB

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 <u>www.fairwear.org</u>. The online <u>Brand Performance</u> <u>Check Guide</u> provides more information about the indicators.



BRAND PERFORMANCE CHECK OVERVIEW

Kwintet AB

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

AFFILIATE INFORMATION	
Headquarters:	Malmö, Sweden
Member since:	01-07-2011
Product types:	Workwear
Production in countries where FWF is active:	Bangladesh, China, India, Romania, Tunisia,Vietnam
Production in other countries:	France, Germany, Italy, Lao, Latvia, Lithuania, Madagascar, Malaysia, Morocco, Pakistan, Poland, Portugal, Spain, Sweden, 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	81%
Benchmarking score	57
Category	Needs improvement;57

3/31

Summary:

Kwintet is in process of implementing FWFs management system requirements. After the closing of financial year 2014, Kwintet reached 81% of their production volume included in their monitoring system. This is below the required threshold of 90% for an affiliate in its fourth year of membership. Kwintet further consolidated its base of suppliers. At 84% of their suppliers they occupy more than 10% of the production capacity. Combined with a longer term business relationships, this offers good possibilities and leverage to work on improvement of working conditions. With the merger of CSR and Quality it has established a good system for monitoring compliance. This system includes already all suppliers in South East Asia. Including also suppliers in other countries in this system, and implementing monitoring requirements for production locations falling under the low risk policy, will further enhance improved insight in social compliance in its supply chain. Kwintet uses already for years an advanced violation matrix and grading system. To reach the monitoring threshold Kwintet needs to (re-)audit more suppliers and it is recommended to involve more factories in the Workplace Education Programme or other training programmes to actively stimulate the improvement of worker management dialogue. Next to that Kwintet should look for other ways to actively support suppliers in working on challenging issues as reducing overtime and making steps towards living wages.

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	84%	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: Kwintet has invested in further consolidating its supplier base, a.o. by reducing production locations used for their orders by intermediate suppliers.

1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years	65%	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.	3	4	0	
--	-----	---	---	---	---	---	--

Recommendation: Long term relationships support most aspects of the Code of Labour Practices, and give factories a reason to invest in improving working conditions.

Comment: With the majority of suppliers, Kwintet maintains a long term business relationship, which it further tries to stimulate by further consolidating its supplier base.

	Signed CoLPs are on file.	2	2	0
--	---------------------------	---	---	---

Comment: Kwintet uses a standard procedure to evaluate new suppliers and inform them on social, environmental and technical requirements and ensures the FWF questionnaires are signed and returned.

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	4	4	0
			assessments.			

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 Kwintet to assess the risks associated with operating in specific production areas. FWF advises to use information from FWF country studies and wage ladders. The affiliate can cooperate with local stakeholders to further investigate the situation in a specific country

Comment: Kwintet did not start production in new countries. In the countries where it is active, it is active already for quite some years and the company has own staff available in Dhaka and for the South East Asia region based in Hong Kong. Kwintet uses country studies for own auditors and has a well advanced system to assess possible new factories on different aspects, including performance on social compliance.

1.5 Supplier compliance with Code of Labour Practices is evaluated in a systematic manner.	Yes, and performance improvement is rewarded	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,	2	2	0
	is rewarded		etc.			

Comment: Kwintet uses an advanced violation matrix and grading system already for years. Suppliers get a grading according to their performance as assessed during audits. They can be graded red, orange, yellow or green graded. Red graded suppliers receive a short period (3 months) to show the start of improvement, otherwise orders will not be placed anymore. For Orange graded suppliers there is follow up after 6 months. In the Asia region quality staff frequently visits the locations and checks progress.

1.6 The affiliate's production planning systems support reasonable working hours. Stron integ syste place	have a significant impact on the levels of robust	entation of 4 4 Ilanning S.	0
---	---	-----------------------------------	---

Comment: Kwintet uses long lead times, and a clear monthly planning cycle. Next to that their products are less (if not all) dependent on fashion trends, and as such more flexible. In some countries factories provide Kwintet with information on production capacity in which overtime is already included. Kwintet does not use this full capacity. It is aware of the risks for excessive overtime. There is no policy in place for late deliveries, If there is a situation where a late delivery is expected, ad hoc solutions are found.

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: Where Kwintet did receive an action plan of a supplier to remediate excessive overtime, this action plan should be followed up actively and where possible Kwintet should facilitate the action plan.

Comment: Kwintet uses long lead times. Next to that Kwintet maintains the practice to require an action plan from suppliers where there is excessive overtime.

1 51 5	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
		the labour costs of garments.	or country/city level.			

Comment: Open costing is used, and CMT prices are known and breakdown of these prices are given in costing sheets and a standard allowed amount of minutes is used. Kwintets regional/local staff is well aware of levels of legal minimum wage.

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

Requirement: Kwintet has to take adequate steps to move towards living wages as estimated by local stakeholders.

Recommendation: FWF encourages Kwintet to assess the hypothetical cost effects of increasing wages towards benchmarks that are included in the wage ladder at suppliers where leverage is > 50%, followed by a discussion between the suppliers management and worker representatives and responsible buyer, on the steps that need to be taken to start moving towards living wages for the workers..

Comment: With audits wage information is gathered, and wage ladders are included in audit reports and discussed with the factories.

1.12 Affiliate sources from an FWF factory member.	Νο	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.	20%	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: Kwintet owns production locations in Latvia, Russia and Ukraine that account for 20% of the production volume.

PURCHASING PRACTICES

Possible Points: 42 Earned Points: 29



2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	78%	
% of own production in low risk production countries where FWF's Low Risk policy has been implemented	3%	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	81%	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: Within Kwintet the CSR and Quality manager is responsible for ensuring monitoring of the supply chain of all brands part of the Kwintet group.

2.2 Degree of progress towards resolution of Intermeters existing Corrective Action Plans	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: Kwintet needs to ensure follow up on all findings and be able to show improvements

realised. To facilitate remediation, the affiliate 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: For the Asia Region there is full time compliance staff responsible for visiting and following up of CAPs and communication with suppliers on audit findings. During the performance check FWF did a sample check to see whether Kwintet could prove follow up had been done on earlier findings in CAP's . For some suppliers there was good and up to date insight thanks to recent visits of own staff. However, on some no follow up information was available on issues found during earlier audits. This was partly due to a vacancy in the Dhaka office and partly due to factories not keen on sharing information on follow up of findings. Kwintet is looking into the option in charging this factory for a re-audit.

suppliers that have been visited by the affiliate in the past financial year	Formal audits should be augmented by annual visits by affiliate staff or local representatives. They reinforce to factory managers that affiliates are serious about implementing the Code of Labour Practices.	Affiliates should document all factory visits with at least the date and name of the visitor.	4	4	0
--	---	---	---	---	---

Comment: All the suppliers in Asia are frequently visited by either quality or CSR staff. For the production locations outside Asia this is not yet organised centrally for all brands.

2.4 Existing audit reports from other sources are collected.	Yes and quality assessed	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.	2	3	0	
--	--------------------------------	---	--	---	---	---	--

Comment: Existing audit reports are collected together with the self assessment of suppliers. They are included in the due diligence phase. For monitoring its production locations Kwintet uses their own audits and visit reports.

2.5 Audit Report and Corrective Action Plan (CAP) findings are shared with factory. Improvement timelines are established in a timely manner 2 part indicator: FWF audit reports and discussed with suppliers within months of audit receipt AND a reas frame was specified for resolving f	in two Plans, emails; sonable time findings of followup	2 2	-1	
--	--	-----	----	--

Recommendation: It is recommended to register whether CAPs have been shared and seen by management of the production locations. Furthermore Kwintet should ensure the CAPs are also shared with worker representatives where those are present and functional.

Comment: Kwintet does not collect hard copy signed documents, but it was possible to check the email correspondence and confirm for a sample of suppliers that indeed the CAPs were shared with the factory.

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.	take many forms; additional research,	3	6	0	
--	--------------------------	--	--	---	---	---	--

Recommendation: Knowing the country specific risks facilitates the starting point for discussing this with suppliers. Affiliates can agree on additional commitments that are required to mitigate risks. Kwintet can provide additional measures for support and integrate that in the monitoring system

Comment: Kwintet is, thanks to its local and regional staff, well aware of specific risks. For China this means for example that extra attention is paid to proper payment of overtime and a check whether the overtime was voluntary. Their audit matrix applies globally.

2.6a High risk issues specific to Bangladesh are identified and adressed by the monitoring system and remediation activities.	Intermediate Capacity	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.	1	3	0
---	--------------------------	---	--	---	---	---

Requirement: Ensuring participation of management of production locations in Bangladesh in the FWF fire safety workshops is required

Recommendation: Kwintet should contact FWFs country representative to ensure participation of their suppliers in the Fire Safety Management workshops. Next to that Kwintet should consider taking more explicit steps to deal with harassment at the work floor in Bangladesh, for example by stimulating production locations to take part in the WEP programme and facilitate the establishment of Anti Harassment Committees.

Comment: Kwintet has decided that it will sign the Accord as Kwintet AB per the 1st of June 2015. The company made sure every supplier has been inspected by either the Accord, or alliance and next to that they made sure that no production location is located anymore in a commercial multipurpose building, Only a very small numbers of the suppliers have participated in the FWF fire safety management workshops.

2.6b High risk issues specific to Myanmar are identified and adressed by the monitoring system and remediation activities.	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 cooperation	Cooperation between customers increases leverage and chances of successful outcomes. Cooperation also reduces the changes of a factory having to conduct multiple Corrective Action Plans about the same issue with multiple customers.	Shared CAPs, evidence of cooperation with other customers.	-1	2	-1	
---	-------------------	--	---	----	---	----	--

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

Comment: In principle Kwintet is willing to share information and cooperate with other customers, however they make a decision on a case by case basis and have responded negatively in the past year on requests to share documents.

2.8 Monitoring requirements are fulfilled for production in low-risk countries	No	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.	0	2	0
--	----	--	---	---	---	---

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 annually by affiliate representatives;
- Be informed of FWF membership and return the completed CoLP questionnaire before production orders are placed;
- Be aware of specific risks identified by FWF;
- Have the FWF Worker Information Sheet posted in local languages.

Comment: Kwintet does share the Code of Labour practices with all their suppliers, but could not show proof of the posting of the FWF information sheet for workers in the production locations in countries falling under the low risk policy and not all locations are visited.

2.9 External brands resold by the affiliate who have completed and returned the external brand questionnaire. (% of external sales volume)	No external brands resold	FWF believes it is important for affiliates that have a retail/wholesale arm to at least know if the brands they resell are members of FWF or a similar organisation, and in which countries those brands produce goods.	Questionnaires are on file.	N/A	3	0
2.10 External brands resold by affiliates that are members of another credible initiative. (% of external sales volume)	No external brands resold	FWF believes affiliates who resell products should be rewarded for choosing to stock external brands who also take their supply chain responsibilities seriously.	External production data in FWF's information management system. Documentation of sales volumes of products made by FWF or FLA members.	N/A	3	0

MONITORING AND REMEDIATION

Possible Points: 32

Earned Points: 17



Additional comments on Monitoring and Remediation:

As Kwintet is conducting partly their own audits with qualified staff, Kwintet needs to continuously ensure the audit quality is sufficient for the audits to be counted towards the threshold. For this it is agreed that Kwintets compliance staff and FWF audit supervisors. Next to a CAP it is required to also include a narrative report, in which information is included on the used methodology, number of auditors and different resources used to base the conclusions upon. Elements that can be improved are: 1) to include information on each labour standard of the FWF COLP, even if there are no findings, to avoid misunderstandings. 2) To always ensure more team members in an audit, to enhance the possibilities to crosscheck information and reduce the possibility of corruption/losing neutrality. 3) Make known in the reports how available stakeholder information (for example on specific risks regarding fire safety, violence against women or the occurrence of excessive overtime in combination with double bookkeeping and or time records) is used to crosscheck findings and to indicate clearly in the reports which sources have been used (documents/visual check/management interviews/worker interviews). Kwintet does have information from suppliers whether they have the information sheet for workers posted in the factories. That information needs to be included in the audit reports in order to be checked by FWF.

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	2	

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	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
--	---	---	---	---	---

Requirement: Kwintet must ensure that the Worker Information Sheet, including contact information of the local complaints handler of FWF, is posted in factories in a location that is accessible to all workers. Affiliate should check by means of a visit whether the Worker Information Sheet is posted in the factories.

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

Comment: For all production locations in Asia there is a system in place and locations are visited. For production locations in other countries the communcation system with the locations is in place, but not all locations are visited.

3.3 Percentage of FWF-audited factories where at least half of workers are aware of the FWF worker helpline.	57%	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
--	-----	---	---	---	---	----

Recommendation: Posting the FWF information sheet is the first step towards awareness raising about the existence and functioning of FWFs worker hotline.

More steps have to be taken however often to ensure workers are informed about their rights and the FWF complaints mechanism. The supplier can be stimulated to inform their workers actively. The affiliate can also stimulate its suppliers to participate in FWF WEP or other trainings, to raise awareness about the existence and the functioning of FWF's worker hotline. In addition to sending the worker information sheet, affiliates can use and distribute the worker information cards during their visits to the locations. The cards are available for download on FWF's website. The cards are small easy distributable cards with concise information about rights and the number of the FWF helpline.

Comment: 3 FWF audits were done and 4 suppliers participated in a WEP training. At 57% workers are aware of the FWF worker helpline.

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: Kwintet dealt adequately with two earlier complaints from 2013.

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

Recommendation: It is advised to inform own staff on activities related to FWF membership several times throughout the year, to ensure awareness is maintained.

4.2 Ongoing training in support of FWF Yes requirements is provided to staff in direct contact with suppliers.	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: Additional activities were organised for sales staff and customers. The global CSR manager did a tour through Europe to visit all the regional offices to provide workshops on the company's CSR policies and practices.

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)	13%	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.	2	6	0

Comment: Four production locations in Bangladesh participated in the WEP programme.

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	
--	----	---	---	---	---	---	--

Comment: Kwintet did not develop activities to provide trainings to suppliers related to enhancing awareness regarding the FWF Code elements and the FWF helplines.

TRAINING AND CAPACITY BUILDING

Possible Points: 13 Earned Points: 5



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

Recommendation: Affiliates are advised to develop a systematic approach to complete the supplier list. Part of the approach can be to automatically include information from audit reports and complaints and to make 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. All production locations involved in the production process of the garment after the making of the fabric should be inlcuded in the FWF database with correct address and FOB figures should be added when the financial year has ended.

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: For the majority of the suppliers the correct information is available within the company, however FOB figures are not in all cases available per production location, when a supplier uses different locations. Kwintet is working towards having the figures available per location. In those countries where Kwintet has own quality staff frequently visiting the locations, the information on production sites is listed in the companies system. If a factory is not listed, no inspection can be done This will help the company having a good oversight on all locations. This system has to be expanded though still to the non Asian countries.

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	
---	-----	---	--	---	---	----	--

Recommendation: Kwintet could consider how to use the information from staff visiting the suppliers frequently and feeding that information back into the monitoring system, for example on updates of statuses of findings from a CAP.

Comment: There are two- monthly meetings, and regular telcoms between the contact persons of the suppliers (supplier owners), quality staff and csr staff. QC staff use a checklist to check on compliance related information and outstanding issue of CAPs within their possibilities. Next to that through the intranet KIT, staff can access CSR related documents of all active 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, on garment communication of FWF membership is only allowed for affiliates being assessed and qualified as 'leader'.

Recommendation: On garment communication of FWF membership is only allowed for FWF affiliates that score in the leader category and after approval of FWF communication staff. Kwintet should ensure all relevant staff of all brands is aware of the FWF communication policy, especially regarding on garment communication.

It is recommended to nuance the wording in the catalogue of Wenaas where it is mentioned that the brand complies with ILO standards, as that is difficult to guarantee for 100%.

Comment: During the performance check a picture was shown of a washing label with communication of FWF membership. It was not clear however whether this concerned a product made last year. Information on FWF membership is missing on the brand pages of: B&C, Clinic dress and Lafont. One brand is missing on the brand page of FWF, namely Djupvik. The wording of FWF in the different catalogues is correct. It is noted that on garment communication on FWF membership is used, which is not allowed according to the FWF communications policy.



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
--	----	---	---	---	---	---

Comment: The Brand performance check is in included in the intranet system so that other staff, for example sales staff can use it. The same counts for the social report. The latest versions are not published on the corporate website.

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	
---	---	---	---	---	---	----	--

Comment: Kwintet did not publish their social report yet on their corporate website.

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

Comment: Top management is involved in establishing and discussing the CSR strategy up to 2017. Regular monitoring activities and results are discussed with only the direct people involved. Only high risk issues would be discussed at top management level. Two monthly meetings are held with QC and CSR staff to discuss state of affairs and planning.

7.2 Changes from previous Brand Performance Check implemented by affiliate	25%	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	
---	-----	---	---	---	---	----	--

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.

Comment: Kwintet followed up on the requirement of last years performance check to improve the documentation of the sharing of reports and CAPs with the factory. This is now available in email correspondence. It is recommended however to register this systematically. The other requirements regarding making steps towards living wages, fullfilling the requirements for monitoring locations in low risk countries and complying with the FWF communication policy are not followed up and repeated findings during the current performance check.



EVALUATION

Possible Points: 6

Earned Points: 4

Additional comments on Evaluation:



RECOMMENDATIONS TO FWF

FWF should work more on communication in France.

29/31

SCORING OVERVIEW

<u>, </u>	<u> </u>	<u> </u>	<u>x x x </u>
CATEGORY	EARNED	POSSIBLE	
Purchasing Practices	29	42	
Monitoring and Remediation	17	32	
Complaints Handling	9	13	
> Training and Capacity Building	5	13	
Information Management	4	7	
Transparency	-1	4	
Evaluation	4	6	
Totals:	67	117	
	$\times \times $	$\land \land $	$\overline{\mathcal{N}}$

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

57

PERFORMANCE BENCHMARKING CATEGORY

Needs improvement;57



BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

30-04-2015

Conducted by:

Margreet Vrieling

Interviews with:

Caroline Bouisset, CSR and Asia Quality Manager Gary Lee, Regional Compliance Manager Lennart Eriksson, Vice president Group sourcing & supply chain Ian Ritchie, Director Global Operations Asia

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.

