



BRAND PERFORMANCE CHECK

Outdoor & Sports Company Ltd.

PUBLICATION DATE: NOVEMBER 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. The online [Brand Performance Check Guide](#) provides more information about the indicators.

BRAND PERFORMANCE CHECK OVERVIEW

Outdoor & Sports Company Ltd.

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

AFFILIATE INFORMATION	
Headquarters:	Cheshire, United Kingdom
Member since:	01-07-2012
Product types:	Sportswear
Production in countries where FWF is active:	Bulgaria, China, India
Production in other countries:	Hungary, Indonesia, Lithuania, Taiwan, Ukraine, United Arab Emirates
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	see summary below
Benchmarking score	70
Category	Good

Summary:

Outdoor & Sports Company Ltd. (OSC) meets most of FWF's monitoring system requirements. At the end of 2014, it had a monitoring percentage of 70%. In the first six months of 2015, three calendar years after joining FWF, it attained the required 90% monitoring threshold. As OSC scores well within the Good category with 70 points and attained the required 90% in the first half of 2015, it has been awarded a Good rating.

In 2014, OSC continued its work of auditing and CAP remediation, and maintained a systematic structure for this. Two verification audits showed effective CAP follow-up and remediation. Due to this systematic structure, it was also able to identify where the more complex issues related to overtime and living wages took place, and set in place a program to address this.

In 2014, two WEP training sessions were organized in cooperation with another FWF member. In addition to this, 2 complaints were filed and resolved.

OSC is encouraged to maintain its auditing and CAP remediation efforts. Documentation related to its work to remediate the more complex issues related to overtime and living wages is needed to be able to effectively show progress. In addition to this, OSC is also encouraged to gain more country-level information related to social compliance risks and work to mitigate these more effectively.

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	65%	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.	3	4	0

Comment: 65% of production volume comes from suppliers where OSC is responsible for at least 10% of production capacity, a significant increase from the previous year. This puts OSC in a good position to effect positive change at its suppliers.

1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years	58%	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
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Recommendation: FWF recommends OSC to maintain stable business relationships with suppliers. Long term relationships support most aspects of the Code of Labour Practices, and give factories a reason to invest in improving working conditions.

Comment: 58% of production was at factories where it has had a relationship for at least five years. This is a reduction from the previous year, and is due to higher demand for products being produced at more recent suppliers. It is OSC's aim to build longlasting relationships with its suppliers.

1.3 All new suppliers are required to sign and return the Code of Labour Practices before first orders are placed.	Yes	The CoLP is the foundation of all work between factories and brands, and the first step in developing a commitment to improvements.	Signed CoLPs are on file.	2	2	0
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Comment: There were 4 new suppliers in 2014. Check w OSC

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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Recommendation: FWF encourages OSC to better document its due diligence process at new suppliers.

Comment: OSC started with a number of new suppliers in 2014. New factories are selected on the basis of the product the factory specialises in, as well as quality, price, capacity availability, communication, factory ownership, location and ethical guidelines.

In the selection process for a new supplier, human rights due diligence takes place. After a sampling and pricing programme, there is a factory visit. During this visit, OSC establishes whether the supplier conforms to supplier guidelines and meets its ethical standards. During this visit, FWF membership and the factory's willingness to be audited by FWF's audit team are also discussed.

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
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Recommendation: OSC 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: OSC has introduced FWF, the CoLP and following up on CAPs into its business process. This means that CAPs are followed up systematically, and maintained with a spreadsheet where all relevant social compliance information is kept.

Currently, there is an evaluation of quality (returns) and timing on a monthly basis. Social compliance issues on a supplier level are not (yet) included in this evaluation.

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: In general, lead times for production is around 4-5 months. OSC tries to get forecasts out as soon as possible and offers incentives for early order placement. In addition to this, it also works with split order so that the supplier receives information earlier. From the time fabric arrives at the supplier, a lead time of 2 months is given. Deadlines are determined in partnership with suppliers, and after every season there is an evaluation to discuss how the production went and if there are issues that can be improved.

Based on experience, fabrics arriving from Japan have longer lead times. OSC has also started a greige program that is geared to create more flexibility in terms of production planning.

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
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Recommendation: FWF encourages OSC to conduct a root cause analysis of excessive overtime to investigate which steps can be most effective to reduce overtime. FWF also encourages documentation of this analysis and steps taken to remediate any issues that have not been resolved yet.

Comment: OSC, as part of its standard business practice, always reviews the previous season with suppliers to see where production improvements can be made and better streamlined. This could be on a product level or on a factory level. A verification reaudit at a factory in China indicated that there was still room for improvement in terms of sample approval and fabric delivery times.

In 2014, OSC also started having a more technical sampling process, aiming to reduce the time needed for the sample to be finalized. It also accepted later delivery when this was necessary.

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 the labour costs of garments.	Formal systems to calculate labour costs on per-product or country/city level.	2	4	0
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Recommendation: 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: In general, OSC is aware of wage levels on a country level. Target pricing levels are established based on past levels and in negotiation with the supplier.

OSC currently does not have a link between style pricing and wage levels of factory workers, but is working on this for the future.

1.9 Affiliate actively responds if suppliers fail to pay legal minimum wages.	Yes	If a supplier fails to pay minimum wage, FWF affiliates are expected to hold management of the supplier accountable for respecting local labour law.	Complaint reports, CAPs, additional emails, FWF audit reports or other documents that show minimum wage issue is reported/resolved.	1	2	-2
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Comment: There was 1 factory where legal minimum wage was not being paid. OSC only received the audit report in 2015, but immediately contacted the production location and took action to make sure that legal minimum wage was being paid. According to the factory, the issue has been remediated. This will be verified in a next audit.

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
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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
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Recommendation: FWF encourages OSC to continue with its activities to gain insight into the root causes of lower wage levels and taking steps to implement living wages. Documentation of these activities allow OSC and FWF to gauge the level of implementation.

Comment: During CAP follow-up and remediation, FWF and social compliance is now on the agenda of every meeting that OSC representatives have with the management of suppliers. OSC sees this issue as longterm and is working to establish ways to gain ground on wage levels. Steps were taken to separate this from other CAP issues and structured more effectively.

In 2014, OSC has taken steps to gain more insight into pricing. It has started to gain insight into not just CMT costing but also the price of trims, materials, and sewing techniques. By gaining more insight into these elements, the basis is formed for moving towards remediation of wage levels.

These activities will be carried on in next years.

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
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1.13 Percentage of production volume from factories owned by the affiliate.	None	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.	N/A	2	0
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PURCHASING PRACTICES

Possible Points: 40

Earned Points: 27

2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	65%	
% of own production in low risk production countries where FWF's Low Risk policy has been implemented	5%	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	70%	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	Intermediate	FWF considers efforts to resolve CAPs to be one of the most important things that affiliates can do towards improving working conditions.	Documentation of remediation and followup actions taken by affiliate.	4	8	-2

Recommendation: FWF encourages OSC to continue with its structured efforts to address CAP issues. The steps related to overtime and wage levels are especially important to address and document.

Comment: OSC continues to address CAP remediation at each meeting with suppliers, both at the production location and at other meetings and events. The remediation of outstanding issues is tracked in both the individual spreadsheets as well as a general spreadsheet dedicated to identifying and addressing these issues. A verification reaudit at a factory in China showed that many of the CAP issues had been resolved or showed an improvement.

This general spreadsheet has allowed OSC to identify all the suppliers where there are issues related to more complex issues such as overtime and wage levels. As mentioned above, steps have also been taken to address these issues on a structural level with suppliers and work towards remediation. These all set the basis for OSC to make in-depth efforts and identify root causes.

2.3 Percentage of production volume from suppliers that have been visited by the affiliate in the past financial year	78%	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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Comment: OSC works to visit the majority of its production locations at least once a year.

2.4 Existing audit reports from other sources are collected.	Yes	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
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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: OSC always works to collect existing audit reports, but this is not always possible due to the factory not willing to share these reports.

2.5 Audit Report and Corrective Action Plan (CAP) findings are shared with factory. Improvement timelines are established in a timely manner	Yes	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
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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
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Recommendation: OSC is encouraged to further investigate the social compliance issues related to the countries where it produces. Knowing the country specific risks facilitates the starting point for discussing this with suppliers. Members can agree on additional commitments that are required to mitigate risks in a specific country, and can provide additional measures for support and integrate that in the monitoring system.

Comment: OSC is aware of many of the high risk issues specific to its supply chain and the countries where it sources. For audits in Indonesia, an external audit organization was contracted that did stakeholder consultation as part of its audit process.

In 2014, OSC identified issues related to overtime and wage levels with its suppliers on a structural level and initiated a process to identify and remediate root causes. This work will continue in 2015.

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
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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
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2.7 Affiliate cooperates with other customers in resolving corrective actions at shared suppliers	Active cooperation	Cooperation between customers increases leverage and chances of successful outcomes. Cooperation also reduces the changes of a factory having to conduct multiple Corrective Action Plans about the same issue with multiple customers.	Shared CAPs, evidence of cooperation with other customers.	2	2	-1
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Comment: OSC cooperates wherever possible in sharing audits and their follow-up, as well as complaints when they come up.

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
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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
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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
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MONITORING AND REMEDIATION

Possible Points: 29

Earned Points: 20

3. COMPLAINTS HANDLING

BASIC MEASUREMENTS	RESULT	COMMENTS
Number of worker complaints received since last check	2	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	Yes	The Worker Information Sheet is a key first step in alerting workers to their rights.	Photos by company staff, audit reports, checklists from factory visits, etc.	2	2	0
3.3 Percentage of FWF-audited factories where at least half of workers are aware of the FWF worker helpline.	30%	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.	2	4	-2

Comment: At approximately 30% of FWF-audited factories, more than half of the workers were aware of the FWF worker helpline and/or received a WEP training session.

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
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Recommendation: FWF recommends OSC to organize WEP training sessions at these factories in order to make workers aware of their rights and responsibilities when it comes to issues related to severance pay and salaries.

Comment: OSC received two complaints in 2014. One complaint was not grounded, and therefore no further investigation was necessary.

The second complaint was related to the severance pay of a worker, his monthly salary, and the reimbursement of a 15 RMB monthly deduction as administration fee. In this case, the worker was not entitled to his severance pay as he quit without giving adequate notice. His monthly salary was not fixed, so fluctuations were normal. For the deduction, this practice had been stopped already in the past, but reimbursements had not been made.

It was agreed that these reimbursements would be made. However, a follow-up complainant indicated that workers now received a reduction in their meal allowance to compensate. This practice was also stopped after discussions with OSC.

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: 13

Earned Points: 8

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: Internal presentations of FWF are given on a regular basis.

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
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Comment: In 2014, OSC began preparing for a personnel change that will take place in 2016. In this way, OSC ensures that the institutional knowledge related to FWF is not lost.

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
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4.4 Factory participation in Workplace Education Programme (where WEP is offered; by production volume)	42%	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.	4	6	0
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Comment: There were 2 WEP training sessions in 2014, which accounted for 42% of total production volume in countries where WEP is offered.

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: 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: In 2014, OSC did not enroll its factories in any trainings in countries where WEP is not offered.

TRAINING AND CAPACITY BUILDING

Possible Points: 13

Earned Points: 7

5. INFORMATION MANAGEMENT

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
5.1 Level of effort to identify all production locations	Advanced	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.	6	6	-2

Comment: OSC has a strong system in place to reduce the risk of unknown suppliers entering the supply chain. Production locations are visited on a regular basis, and OSC has its own Hong Kong office with QC staff visiting production locations and following up with CAP remediation where possible.

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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Comment: OSC has an internal database where FWF documentation, audit reports and other information is stored. This information is accessible to all staff. As mentioned earlier, it also has a spreadsheet where all CAP issues are listed and updated. This document is available to all necessary staff.

INFORMATION MANAGEMENT

Possible Points: 7

Earned Points: 7

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

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 OSC 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	Published on affiliate's website	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.	2	2	-2
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TRANSPARENCY

Possible Points: 4

Earned Points: 3

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 Changes from previous Brand Performance Check implemented by affiliate	100%	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.	4	4	-2

Comment: In the previous Brand Performance Check, OSC had one requirement related to the identification of high risk issues in its supply chain. It worked to address this issue by, for example, consulting with other FWF brands on finding a suitable external audit organization in Indonesia and took extra steps to involve stakeholder consultation and offsite worker interviews.

EVALUATION

Possible Points: 6

Earned Points: 6

RECOMMENDATIONS TO FWF

N/A

SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	27	40
Monitoring and Remediation	20	29
Complaints Handling	8	13
Training and Capacity Building	7	13
Information Management	7	7
Transparency	3	4
Evaluation	6	6
Totals:	78	112

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

70

PERFORMANCE BENCHMARKING CATEGORY

Good

BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

22-09-2015

Conducted by:

Kees Gootjes

Interviews with:

Brian Connolly, Group Sourcing Director

Hamish Dunn, Brand Director Mountain Equipment

Kevin Offer, Production Manager

Richard Bailey, Mountain Equipment Product Marketing

Sarah Forte, Buying Director Mountain Equipment

Steve Rothwell, Ronhill & Hilly Brand Director

Thomas Coxon, Sprayway Marketing 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.