



BRAND PERFORMANCE CHECK

Stanley and Stella S.A.

PUBLICATION DATE: JUNE 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

Stanley and Stella S.A.

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

AFFILIATE INFORMATION	
Headquarters:	Brussels, Belgium
Member since:	15-12-2011
Product types:	Promotional, Fashion, Workwear, Corporate wear
Production in countries where FWF is active:	Bangladesh
Production in other countries:	Pakistan, Portugal
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	100%
Benchmarking score	85
Category	Leader

Summary:

Stanley&Stella meets most of FWF's management system requirements and goes beyond some of them. Stanley&Stella has a relatively small number of suppliers. It sources 97% of its 2014 FOB volume from four suppliers in Bangladesh. Generally, Stanley&Stella requests a FWF audit before placing the first order with new suppliers. Together with a third-party audit at a supplier in Pakistan, accounting for 2% of its purchasing volume, and a supplier in Portugal (accounting for 1%), Stanley&Stella has monitored 100% of its 2014 purchasing volume and therefore meets FWF's monitoring threshold required of brands in 3+ years of membership. This, in addition to high leverage at suppliers and the stable relationships with suppliers, gives the company a strong basis for effectively improving working conditions.

In 2014 Stanley&Stella successfully enrolled four of its suppliers in Bangladesh suppliers in Fair Wear's Workplace Education Programme. Stanley&Stella systematically works towards resolution of corrective actions with all of its suppliers. After audits, remediation steps were taken and follow up is being closely monitored. Because of its the open costing system, Stanley&Stella is able to indentify the cost of the cutmake (CM) process, which (among others) includes the labour costs. When Stanley&Stella is able to investigate further and determine more precisely the labour costs for its products, it should have a better understanding whether Stanley&Stella FOB prices support payment of living wages. This could then form the basis for discussion with management at suppliers where Stanley&Stella has high leverage, to move towards payment of living wages. It should noted, in this regard, that one of Stanley&Stella's suppliers in Bangladesh, accounting for 70% of Stanley&Stella's 2014 FOB volume, made important steps towards payment of living wages in 2014.

Stanley&Stella can take further steps towards analysing the root causes of excessive overtime, as well as living wages, and how this relates to its own buying practices. Furthermore, it can be more transparent in communicating about FWF and labour conditions at its suppliers publicly.

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	92%	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: Stanley&Stella sources from 3 suppliers in Bangladesh where it accounts for more than 10% of the suppliers' production capacity.

1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years	69%	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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Comment: Stanley&Stella is a new company established in 2011. With one of its suppliers in Bangladesh, accounting for 69% of Stanley&Stella's total FOB purchases, it established a business relation since the start of the company.

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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1.4 Company conducts human rights due diligence at all new suppliers before placing orders.	Yes	Due diligence helps to identify, prevent and mitigate potential human rights problems at new suppliers.	Documentation may include pre-audits, existing audits, other types of risk assessments.	4	4	0
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Comment: The process of selecting new suppliers is as follows:

- Stanley & Stella local staff identify potential suppliers
- The Production Manager visits the facility personally, conducts visual inspection, collect existing audit reports, discuss and sign FWF's Code of Labour Practices
- If timing is possible, FWF local audit team conducts an audit before the first order is placed. Findings of the audit are carefully considered in the selection of new suppliers.
- The factory starts production.

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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Comment: Suppliers are assessed and scored based on 10 criteria, including Strategic, Environment, Ethic-CSR, Health & Safety, Premium Quality, Technical, Commercial, Financial, Logistic & Planning, and Legal issues. Relative weights are allocated for the different criteria, with CSR weighing significantly in the overall score. Scores for all suppliers are allocated during a yearly internal sourcing policy workshop in which staff from the different departments (incl. Bangladesh-based) participate and provide inputs from their respective area of expertise/responsibility.

Based on the scoring system, every year Stanley&Stella announces the "best supplier of the year". It gives publicity to the winning supplier during an annual meeting with Stanley&Stella's European dealers.

1.6 The affiliate's production planning systems support reasonable working hours.	General or ad-hoc system.	Affiliate production planning systems can have a significant impact on the levels of excessive overtime at factories.	Documentation of robust planning systems.	2	4	0
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Recommendation: A good production planning system needs to be established based on the production capacity of the factory for regular working hours.

Comment: Stanley&Stella believes that its sourcing policies do not add pressure on its suppliers to do overtime, as it discusses orders well in advance, allowing its suppliers to arrange yarn timely and plan production properly. Stanley&Stella is in constant dialogue with its suppliers enabling it to detect potential delays early and find a mutually agreeable solution. When a supplier cannot meet the delivery deadline, Stanley&Stella shows flexibility and does not apply penalties.

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: Despite Stanley&Stella’s sourcing practices (described under 1.5), excessive overtime is found during FWF audits in 2014 at some of Stanley&Stella’s suppliers in Bangladesh. Stanley&Stella could discuss with factory management on the causes of excessive overtime and provide support to manage overtime. If necessary, the affiliate could hire local experts to analyse root cause of excessive overtime in cooperation with the supplier. FWF could recommend qualified persons upon request. This could be combined with a root cause analysis on living wages, which is closely linked to excessive overtime. Stanley&Stella could first start supporting factories where it has a higher leverage (buying more than 10% of the production capacity).

1.8 Affiliate’s pricing policy allows for payment of at least the legal minimum wages in production countries.	Style-level policy	The first step towards ensuring the payment of minimum wages - and towards implementation of living wages - is to know the labour costs of garments.	Formal systems to calculate labour costs on per-product or country/city level.	4	4	0
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Recommendation: When Stanley&Stella is able to investigate further and determine more precisely the labour costs for its products, it should have a better understanding whether its FOB prices support payment of at least minimum wages, and moving towards living wages.

Comment: Based on a long-term business partnership, and mutual trust, Stanley&Stella managed to convince factory management to be transparent about their cost calculations. As a result, Stanley&Stella is practicing open-book costing with almost all of its suppliers. The costs for material and CM are therefore known, as well as the factories' profit margin. When prices of yarn fluctuate, or labour costs increase, this will lead to immediate adjustments of the FOB prices. This transparent system reduces the incentive for hard price negotiations.

However, as the labour costs are included in the CM price, which also includes overhead, the labour cost are not known precisely. Based on experience, Stanley&Stella considers that labour costs constitute 60% of the CM cost.

Stanley&Stella tries to influence the mindset of the supplier's management that increasing wages also brings other benefits in terms of higher staff retention, less absenteeism, fewer quality issues, higher worker satisfaction, and enhanced productivity.

1.9 Affiliate actively responds if suppliers fail to pay legal minimum wages.	No minimum wage problems reported	If a supplier fails to pay minimum wage, FWF affiliates are expected to hold management of the supplier accountable for respecting local labour law.	Complaint reports, CAPs, additional emails, FWF audit reports or other documents that show minimum wage issue is reported/resolved.	2	2	-2
1.10 Evidence of late payments to suppliers by affiliate.	No	Late payments to suppliers can have a negative impact on factories and their ability to pay workers on time. Most garment workers have minimal savings, and even a brief delay in payments can cause serious problems.	Based on a complaint or audit report; review of factory and affiliate financial documents.	0	0	-1

1.11 Degree to which affiliate assesses root causes of wages lower than living wages with suppliers and takes steps towards the implementation of living wages.	Factory-level approach	Sustained progress towards living wages requires adjustments to affiliates' policies.	Documentation of policy assessments and/or concrete progress towards living wages.	4	8	0
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Recommendation: Fair Wear Foundation encourages Stanley&Stella to discuss with suppliers about possibilities to work towards higher benchmarks. FWF has developed experience with approaches that ensure that production workers in the selected facility take full benefit from the additional amounts that are committed to wage increases. FWF could give companies specific guidance on process rollout on request.

One of Stanley&Stella's suppliers has taken its open book costing system to its other buyers. In order to enhance leverage, Stanley&Stella could facilitate discussions with the other brands to collaborate on the payment of living wages.

Comment: Stanley&Stella uses FWF's wage ladders from audit reports to discuss with factories on living wages. In addition, Stanley&Stella conducted a wage audit at one of its suppliers in Bangladesh in order to determine wage development at this supplier. The audit showed that the mode (the most commonly applied wage) for regular wage including benefits for sewing operators was above the local living wage estimates. Though not all workers were earning living wages, this supplier (with the support of Stanley&Stella), made an important step towards payment of living wages.

Because of the open costing system, Stanley&Stella is able to indentify the payment of the cutmake (CM) process, which is most labour intensive. When Stanley&Stella is able to investigate further and determine more precisely the labour costs for its products, it should have a better understanding whether its FOB prices support payment of living wages. This could be the basis for discussion with management at suppliers where Stanley&Stella has high leverage, to encourage and support them further to move towards payment of living wages.

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

PURCHASING PRACTICES

Possible Points: 40

Earned Points: 29

2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	99%	
% of own production in low risk production countries where FWF's Low Risk policy has been implemented	1%	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	100%	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: Stanley&Stella requests audits by FWF for all its suppliers in countries where FWF is active. In countries where FWF is not active, which is the case for one supplier in Pakistan, it collects third party audits and follows up diligently on the CAPs. In 2014, Stanley&Stella conducted an audit at a new supplier in Bangladesh, as well as its subcontractor responsible for washing. Both audits took place before the first order was placed.

Stanley&Stella keeps track of progress on all CAPs from all audits, including FWF audits and audits by other initiatives, such as the Accord in Bangladesh. In Bangladesh, it has a local office with dedicated staff that visit the factories on a daily basis to monitor production and follow up on the CAPs. The sourcing and sustainability manager of Stanley&Stella also visits factories several times a year to raise awareness, discuss implementation and encourage factories to make improvements. The status of findings is monitored in a systematic approach with efforts that are coordinated between different staff that have influence over supply chain conditions. Proof of remediation work is collected by Stanley&Stella. Documents and pictures are filed in the CAP and the status of findings monitored during visits. Stanley&Stella's suppliers had made significant improvements on occupational health and safety and other issues. But issues regarding overtime and wages are more complicated and require more time.

2.3 Percentage of production volume from suppliers that have been visited by the affiliate in the past financial year	100%	Formal audits should be augmented by annual visits by affiliate staff or local representatives. They reinforce to factory managers that affiliates are serious about implementing the Code of Labour Practices.	Affiliates should document all factory visits with at least the date and name of the visitor.	4	4	0
2.4 Existing audit reports from other sources are collected.	Yes, quality assessed and corrective actions implemented	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.	3	3	0

Comment: For a supplier in Pakistan Stanley&Stella collected a third party audit report and followed up on the corrective action plan.

2.5 Audit Report and Corrective Action Plan (CAP) findings are shared with factory. Improvement timelines are established in a timely manner	Yes	2 part indicator: FWF audit reports were shared and discussed with suppliers within two months of audit receipt AND a reasonable time frame was specified for resolving findings.	Corrective Action Plans, emails; findings of followup audits; brand representative present during audit exit meeting, etc.	2	2	-1
2.6 High risk issues specific to the affiliate's supply chain are identified and addressed by the monitoring system.	No high-risk issues	Different countries and products have different risks associated with them; monitoring systems should be adapted to allow appropriate human rights due diligence for the specific risks in each affiliates' supply chain.	Documentation may take many forms; additional research, specific FWF project participation; extra monitoring activities, extra mitigation activities, etc.	N/A	6	0

Comment: Almost all production of Stanley&Stella, accounting for 97% of total FOB purchases in 2014, takes place in Bangladesh, which is covered under indicator 2.6a. The remaining 2% is sourced from a supplier in Portugal and a supplier in Pakistan, where it is following up on the CAPs from an external audit. When it continues to source in Pakistan, or expand production there, Stanley&Stella could identify and address high risk issues specific to Pakistan.

2.6a High risk issues specific to Bangladesh are identified and addressed by the monitoring system and remediation activities.	Advanced 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.	3	3	0
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Comment: In Bangladesh, all existing Stanley&Stella suppliers have participated in FWF's workshop on safety principles. Eventhough Stanley&Stella did not sign the Accord, it is collecting and following up on CAPs that follow from the Accord's inspections. In 2014, Stanley&Stella successfully enrolled four of its existing suppliers in Bangladesh in FWF's Workplace Education Programme to mitigate the risk of harassment at work and to strengthen awareness on the FWF grievance procedure and helpline. A WEP at an additional supplier in Bangladesh started early 2015. Anti Harassement Committees were established in all of the suppliers as a result. In 2015 Stanley&Stella intends to enroll a new supplier in Bangladesh in the WEP.

2.6b High risk issues specific to Myanmar are identified and adressed by the monitoring system and remediation activities.	Not sourcing in Myanmar	Myanmar is still in the process of establishing the legal and civil society infrastructure needed to ensure compliance with labour rights. Extra care must be taken when doing business in Myanmar.	Shared CAPs, Wage Ladders per factory.	N/A	3	0
2.7 Affiliate cooperates with other customers in resolving corrective actions at shared suppliers	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

Comment: Stanley&Stella collaborated actively with another supplier on CAP follow-up for a shared supplier in Portugal. It was also open to follow-up together with another affiliate on the audit and CAPs for a shared supplier in Pakistan. Stanley&Stella furthermore shared its audit reports with other members sourcing from the same suppliers in two cases in Bangladesh.

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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Comment: Stanley&Stella has one active supplier in Portugal, which account for less than one percent of its 2014 purchasing volume.It met FWF monitoring requirements for low risk countries for this supplier.

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: 26

Earned Points: 26

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	1	
Number of worker complaints resolved since last check	1	

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.1 A specific employee has been designated to address worker complaints	Yes	Followup is a serious part of FWF membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	1	1	-1
3.2 System exists to check that the Worker Information Sheet is posted in factories	Yes	The Worker Information Sheet is a key first step in alerting workers to their rights.	Photos by company staff, audit reports, checklists from factory visits, etc.	2	2	0

Comment: Stanley&Stella visits its suppliers frequently and checks that the CoLP is posted. Pictures are kept on file. To encourage posting of the CoLP, Stanley&Stella contributes financially to the notice boards. In order to increase awareness it intends to distribute more worker information cards and stickers with the FWF helpline number.

3.3 Percentage of FWF-audited factories where at least half of workers are aware of the FWF worker helpline.	75%	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
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Comment: In 2014, Stanley&Stella successfully enrolled four of its existing suppliers in Bangladesh in FWF's Workplace Education Programme.

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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Comment: One complaint was received in 2014 against a supplier in Bangladesh. A member of the Anti Harrassment Committee complained that she did not receive promotion and wage increment to which she felt entitled. Local staff of Stanley&Stella actively participated in meetings with management which underlined the importance attached to it by Stanley&Stella and encouraged management to agree on a solution agreeable to the plaintiff. The case was subsequently closed.

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: 10

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: Stanley&Stella's sourcing and sustainability manager provides training to new staff. Information was also shared internally with all staff on the Workplace Education Programme in Bangladesh. Social reports and brand performance checks are shared with all colleagues within Stanley&Stella.

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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Recommendation: Stanley&Stella's local staff in Bangladesh could participate in safety training organized by Fair Wear Foundation and the Workplace Education Programme at its suppliers in Bangladesh.

Comment: Stanley&Stella's General Manager, as well as staff in charge of product development, are aware of general sustainability issues. The main responsibility regarding FWF requirements, however, lies with the sourcing and sustainability manager and staff of the local office in Bangladesh. Continuous support and coaching is provided for staff in Bangladesh responsible for day-to-day follow up on CAPs.

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)	95%	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.	6	6	0
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Comment: In 2014, Stanley&Stella successfully enrolled four of its existing suppliers in Bangladesh in FWF's Workplace Education Programme.

4.5 Factory participation in trainings (where WEP is not offered; by production volume)	All production is in WEP areas.	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.	N/A	4	0
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Recommendation: When Stanley&Stella expands production in Pakistan, FWF recommends to arrange trainings on their own. Trainings must meet FWF quality standards: top management, supervisors and workers should be included in the trainings. Workplace standards and dispute handling should be part of the contents. At least 10-20% of the workforce must be trained, depending on the size of the factory.

Comment: Stanley&Stella has one supplier, accounting for 2% of FOB purchasing volume, in a country (Pakistan) where WEP is not offered and where workers have not participated in training on labour standards and social dialogues.

TRAINING AND CAPACITY BUILDING

Possible Points: 9

Earned Points: 9

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

Recommendation: Stanley&Stella could do more to monitor suppliers of labels, as some recent incidents have occurred where factories in Bangladesh outsourced the printing of labels to informal workshops without informing the brand.

Comment: Local office of Stanley&Stella in Bangladesh is frequently visiting factories to monitor carefully all production locations. Vists are also conducted to subcontractors such as washing and dyeing facilities, or suppliers of boxes. No evidence from FWF audits was found that the factories use unauthorised subcontractors, which remains a specific risk in Bangladesh.

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: Stanley&Stella's sourcing and sustainability manager travels to Bangladesh every two months during which time information about existing and (potential) new suppliers is shared and discussed.

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

Comment: Stanley&Stella communicates about FWF through on-garment labels, the company website, social report and the company catalogue. Membership is described in correct wording. FWF also features prominently in the corporate movie of Stanley&Stella which is made available to its customers. In addition, social media is used to report on CSR development, including the fashion revolution and FWF activities.

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: Stanley&Stella could make relevant information better accessible on the website for people that want to learn more about Stanley&Stella's efforts to improve labour conditions and FWF membership.

Comment: Stanley&Stella intends to share more information publicly, including information about labour conditions in its suppliers through FWF audit reports (made anonymous).

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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Comment: The social report, as well as the brand performance check, are published on the website of Stanley&Stella. Information, however, is not easy to find, as one needs to click on the FWF logo to see the documents for download.

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

Comment: FWF membership plays an essential part in Stanley&Stella's sourcing decisions.

7.2 Changes from previous Brand Performance Check implemented by affiliate	No requirements were included in previous Check	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.	N/A	4	-2
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EVALUATION

Possible Points: 2

Earned Points: 2

RECOMMENDATIONS TO FWF

- FWF could consider to provide members with audit reports that are made anonymous, making it easier for brands to share these publicly.
- Acknowledging that FWF audits are more rigorous than others, it would be good if audits could be less expensive to allow smaller brands that are just starting to do more.
- It would be good if the invoices for FWF audits could be sent within one month following the audit. Especially when the invoice is received in the following financial year it could create difficulties to trace and reconcile.

SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	29	40
Monitoring and Remediation	26	26
Complaints Handling	10	13
Training and Capacity Building	9	9
Information Management	7	7
Transparency	3	4
Evaluation	2	2
Totals:	86	101

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

85

PERFORMANCE BENCHMARKING CATEGORY

Leader

BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

22-05-2015

Conducted by:

Koen Oosterom

Interviews with:

Jean Chabert, Managing Director

Bruno van Steenberghe, Sourcing and Sustainability Manager

Marie Kuza, Customer, Sales 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.