



BRAND PERFORMANCE CHECK

Triaz GmbH

PUBLICATION DATE: DECEMBER 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

Triaz GmbH

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

AFFILIATE INFORMATION	
Headquarters:	Freiburg im Breisgau, Germany
Member since:	01-09-2011
Product types:	Fashion
Production in countries where FWF is active:	Bulgaria, China, India, Macedonia, the former Yugoslav Republic of, Romania, Tunisia, Turkey
Production in other countries:	Bosnia and Herzegovina, Czech Republic, Germany, Lithuania, Poland, Spain, Switzerland, 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	95%
Benchmarking score	80
Category	Leader

Summary:

Triaz meets most of FWF's management system requirements and goes beyond. With 95% of their supplier base under monitoring, Triaz has exceeded the required 90% of monitoring for its third year of membership.

In 2014 Triaz started working with a new and more detailed supplier rating system, in which active follow-up of Corrective Action Plans (following audit findings) is an important part of the rating. Several departments coordinate efforts needed to make progress at suppliers on social standards. Triaz also introduced a new way of planning production of basic wear (80% of its production) to spread seasonal production more evenly and order different styles with main suppliers. Its winter catalog now contains items of summer and vice versa. Triaz trained agents in 2014 on social standards and actively promotes FWF requirements with external suppliers. It has even done monitoring audits and actively followed up on complaints at production locations of external suppliers, which goes beyond FWF requirements to do so at own suppliers.

Triaz is recommended to evaluate the impact of Triaz's new way of planning on reducing excessive overtime at suppliers of basic wear. FWF encourages Triaz to further refine its efforts to make detailed product costing calculations at two main suppliers (where it has high and/or total leverage) on the basis of existing living wage benchmarks, draw conclusions for its pricing policy and take steps towards the implementation of living wage. Triaz is recommended to motivate its main supplier(s) to join WEP trainings in countries where FWF will newly provide WEP trainings (e.g. Macedonia, Tunisia, Romania).

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	77%	Affiliates with less than 10% of a factories' production capacity generally have limited influence on factory managers to make changes.	Supplier information provided by affiliate.	4	4	0

Comment: Triaz has good leverage at its main production locations. At one main supplier it has 100% leverage.

1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years	87%	Stable business relationships support most aspects of the Code of Labour Practices, and give factories a reason to invest in improving working conditions.	Supplier information provided by affiliate.	4	4	0
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Comment: Triaz has a long-lasting supplier business relationship (more than five years) at most of its production locations.

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: Since Triaz has a long lasting relationship with its suppliers, it does not seek frequently for new suppliers. For Triaz's own brand Vivanda the goal is to have more own suppliers and less external suppliers in the future. In 2014 Triaz has made progress on this and started working with suppliers in Poland, Tunisia and Macedonia.

The FWF questionnaire for these new suppliers were filled in by the agent. Triaz developed a second questionnaire, especially for factories, which is more detailed, and filled in by all own suppliers to collect specific information on production locations, as well as by external suppliers. This is in the process to be completed by all suppliers.

It was confirmed during the Brand Performance Check that all new suppliers of last year had signed the FWF Code of Labour Practices (CoLP).

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: In general production sites of new suppliers in high risk countries are either visited or suppliers come to the main office of Triaz before production starts.

In any case, Triaz shares FWF information in written and requests the supplier to fill in the questionnaire on social standards and to sign the Code of Labour Practice (CoLP) before first orders are placed. There are three sheets a supplier has to sign before production can take place at a new site: purchasing conditions, article pass and FWF requirements (questionnaire). As part of the questionnaire, production sites have to answer whether the production is done in-house or subcontracted. See further on the subcontracting requirements: 5.1. The questionnaire also includes information about existing audit reports of social and organic compliance.

Additionally, Triaz also asks their external suppliers to inform Triaz of their supplier lists, and also makes a monitoring effort at suppliers of external suppliers, which goes beyond the requirements of FWF

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, etc.	2	2	0
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Requirement:

Comment: Triaz has developed an elaborated rating system, that, among other things, includes social and ecological compliance and risk management. Each supplier is evaluated in detail on social standards, e.g. transparency disclosing production sites (e.g. agents and external suppliers), whether they are audited/trained and how well they perform with regard to implementation of CAPs. The system has become active end of 2014.

In the evaluation of social standards, the implementation of Corrective Action Plans receives the highest credit in the rating system. In general, Triaz has an approach of cooperative supplier relations. Because of high social and ecological standards this cooperative approach is even more important. Still, under performance on social standards and lack of willingness to make progress, will be criterion for exclusion.

After the CSR department discusses social ratings internally, all departments (buying, purchasing, sales, quality control etc.) working with suppliers together discuss the supplier ratings. After this first season of operating the rating system, cases were selected for which it will be good if departments work together to work with the supplier concerned. With the idea that buying departments need to support working on social issues with suppliers, to change the mind-set and influence the supplier to make an effort to develop the supplier and make progress on social standards. Triaz states that the new rating system is found very useful for inter-departmental discussion on how to make progress at suppliers.

A bad scoring on social standards is also discussed with top management. Suppliers that do not do well are given a warning and if no progress can be made, the business relationship is terminated. In case suppliers are not willing to sign the CoLP or follow up on CAPs, the suppliers are not rated and business does not start or will end.

Triaz could show in 2014 it rewarded a Chinese supplier, which did well (as audits showed) and which participated in the Workplace Education Program, by increasing orders.

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: FWF recommends Triaz to evaluate in due time the impact of its new way of planning production of basic wear on reducing excessive overtime in peak seasons and providing employment and regular production in (what used to be) low season.

Comment: Delivery times in general are three months for the first order, two for re-orders. Triaz considers the availability of the material in the market before fixing delivery dates. Delivery delays are generally accepted without any financial deduction, though supplier needs to explain reasons and ways to prevent reoccurring in the future. Once a style is set, the supplier receives all information on how to produce the article. Many suppliers receive pre-payments to finance the material.

In 2014 Triaz made an analysis of production flows in quantities per supplier and per quality. Triaz started working on a new way of trying to spread production of basic wear (80% of its volume). Production forecasting is now done well in advance and ordered in different blocks, so the use of suppliers' production capacity is spread more evenly. CSR staff closely cooperates with planning department.

To be able to spread production for the winter season, winter season products are now also included in the June catalog. At the same time, the winter catalog will include linen articles, which normally are only included in the summer catalog. So, winter items are now included in summer catalogs and vice versa.

Triaz could show examples of following up on its analysis of production flows and special efforts to even out production orders at several suppliers.

At a Turkish supplier (where also audits showed excessive overtime to take place), it was found the order volume of Triaz for winter garments was too high and concentrated in a too limited time frame. Triaz now tries to spread orders for the winter collection and supplier is asked during inevitable peaks to work with subcontractors that will be audited, or Triaz will seek additional new suppliers. At the same time, Triaz supports this supplier to learn other types of production to use production capacity during low season for other styles.

Triaz is now more aware to notice also under-capacity at suppliers and the effect this has on its suppliers and on the workers, because of lack of a constant work flow. At a Chinese supplier which was found to have under capacity (and did well on social standards, see 1.5, hence orders were increased), the need to diversify became apparent and now also cotton production was tested, so supplier can use more of its capacity.

The impact that this new way of trying to spread production (of basic wear) has on working hours, is to be analysed at a later point in time. Triaz acknowledges this effort made to spread production planning of basic wear (80%) is not yet possible for fashion (20%).

1.7 Degree to which affiliate mitigates root causes of excessive overtime.	Advanced 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.	6	6	0
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Recommendation: FWF recommends Triaz to continue its analysis of production flows and planning by conducting a brand level research on the contributing factors of overtime in production factories, that were found to be practicing excessive overtime. The member should identify additional strategies to minimize the impact of its sourcing practice on excessive overtime at the factories. FWF recommends Triaz to discuss coordination with other customers.

Comment: Two out of three audits done at direct suppliers in 2014 show findings on excessive overtime. The 3rd audit done in Tunisia showed working hours below the minimum because of low season. One additional audit done at an external suppliers' supplier showed incomplete time records.

In 2014 Triaz took specific action at the two direct suppliers where audits found excessive overtime to take place, in order to prevent and/or mitigate excessive overtime (see 1.6).

Despite efforts made by Triaz at the Turkish supplier producing winter collection (to spread production following findings on excessive overtime, see 1.6), other customers of the same supplier still centered their orders in peak season, following fairs in specific periods of the year. Triaz gave orders during low season but has no control over the production planning system of other customers.

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: FWF encourages Triaz to further refine its style calculations initiated at two main suppliers and draw conclusions in relation to its pricing policy. Triaz is recommended next to use these calculations and analysis as a base for calculation of product costing, also at other suppliers (aside the two main suppliers).

Comment: The price itself is calculated by each supplier for each article. The purchasing staff checks the price given by the supplier and usually agrees to the suppliers' offer but does not know the calculation of each style in depth. For Triaz it is more important to have a stable relationship with the supplier, which follows ecological standards and is committed to work on social criteria, than paying the lowest price possible.

Triaz has made an overview including country level data with details on minimum wages and living wage estimates. It is however not able to determine that the prices they pay suffice for payment to workers of LMW or LW. Triaz does not yet know the working minutes per product.

In 2014 Triaz started to do style costing calculations and gathering wage data at two main suppliers in Bosnia and China, where Triaz has total leverage or majority.

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: Though FWF does not require external suppliers to be audited, Triaz initiated an audit at an external supplier, where it was found 2 non-production workers did not receive the legal minimum wage. Triaz actively followed up on this finding. Supplier sent evidence that now all workers receive at least the legal minimum wage. This will be verified during the 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 Triaz to continue with wage assessments at main suppliers to assess the hypothetical cost effects of increasing wages towards benchmarks that are included in the wage ladder.

Comment: All FWF audit reports of 2014 show that wages paid are below estimates of living wage by local stakeholders. Payment of living wage has been addressed explicitly with factory management using the FWF wage ladder made for the audit reports. At two main suppliers Triaz assessed wage levels to start support a movement towards living wages.

1.12 Affiliate sources from an FWF factory member.	Yes	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.	1	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: 41

Earned Points: 32

2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	74%	
% of own production in low risk production countries where FWF's Low Risk policy has been implemented	21%	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	95%	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: Triaz has designated staff to follow up on problems identified by the monitoring system.

2.2 Degree of progress towards resolution of existing Corrective Action Plans	Intermediate	FWF considers efforts to resolve CAPs to be one of the most important things that affiliates can do towards improving working conditions.	Documentation of remediation and followup actions taken by affiliate.	4	8	-2
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Recommendation: Besides doing audits once in 3 years, the affiliate could consider:

- Hire local consultant to assist factory in developing an action plan and to assist factory management in investigating root causes.
- Organise supplier seminars.

Comment: Corrective actions have been discussed with all 4 suppliers audited in 2014 and a time frame set with factory management. The correction of findings is regularly checked via email and phone and personal visits at the production site by either personal for social standards or purchasing staff.

To follow up more intensively on CAPs, Triaz has encouraged suppliers to join the FWF Workplace Education Programme.

As a follow-up of findings of an audit at an external supplier, Triaz initiated a Workplace Education Program training at this supplier, on the prevention of Violence against Women. This was done in cooperation with another FWF member (which produces own brands at this supplier).

Progress on CAP's is the most important criterion in the Triaz model for social rating of suppliers, which is regularly discussed with purchasing staff in direct contact with the suppliers.

2.3 Percentage of production volume from suppliers that have been visited by the affiliate in the past financial year	43%	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.	2	4	0
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Recommendation: Annual visits should be made for production sites (including subcontractors and production locations in low-risk countries). Regular visits provide the opportunities to discuss problems and corrective actions in the time period between formal audits.

Comment: Most suppliers are visited on a yearly basis by the head of purchasing and also the person responsible for social standards. Key suppliers in High Risk Countries are generally visited once a year. As one big supplier was not visited in the financial year of this Performance Check, the percentage scored at this indicator went down from 75% last year to 43% this year.

2.4 Existing audit reports from other sources are collected.	No existing reports/all audits by FWF or FWF affiliate	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.	N/A	3	0
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Comment: Triaz collects existing audit reports from other sources. Until now, Triaz did not find one audit report which is of same quality as those of FWF but used findings mentioned in existing audit reports to work towards remediation together with the external suppliers.

However, in 2014 all audits were done by FWF.

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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Comment: Audit reports are shared with factory management after the report is received from FWF. Together with the supplier Triaz establishes improvement timelines in a timely manner and re-checks with FWF audit teams in case issues in the audit report or CAP are not clear.

2.6 High risk issues specific to the affiliate's supply chain are identified and addressed by the monitoring system.	Advanced 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.	6	6	0
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Recommendation: FWF suggests that Triaz analyses whether findings from a factory audit could occur at other suppliers as well. This will lead to a preventive approach where issues are addressed in a systematic manner. The analysis should focus on own brand practices as well as regional or country specific issues (such as fire safety or gender discrimination).

Comment: Triaz motivates its suppliers in India to participate in the Prevention of Violence against Women training program. In 2014 after an audit at an external supplier, a complaint was made with regard to violence against women and a WEP training took place straight away. Also at another external supplier a Violence against Women prevention training took place.

Risk management is an integral part of the supplier rating system of Triaz.

Triaz has a clear position and written agreement with suppliers to not use sandblasting in jeans production.

2.6a High risk issues specific to Bangladesh are identified and addressed by the monitoring system and remediation activities.	Not sourcing in Bangladesh	Affiliates sourcing in Bangladesh should take additional action to address both building and fire safety and the prevention of violence against women.	Building, electrical and fire safety inspection reports, evidence of cooperation with other customers sourcing at the same factories (Accord signatories and/or FWF affiliates), etc.	N/A	3	0
2.6b High risk issues specific to Myanmar are identified and addressed by the monitoring system and remediation activities.	Not sourcing in Myanmar	Myanmar is still in the process of establishing the legal and civil society infrastructure needed to ensure compliance with labour rights. Extra care must be taken when doing business in Myanmar.	Shared CAPs, Wage Ladders per factory.	N/A	3	0
2.7 Affiliate cooperates with other customers in resolving corrective actions at shared suppliers	Active cooperation	Cooperation between customers increases leverage and chances of successful outcomes. Cooperation also reduces the chances 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: Triaz actively cooperated with another FWF member on an audit done at an external supplier for Triaz, which is a direct supplier of the other FWF member company. They actively cooperated on the follow-up of the audit findings.

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: Triaz makes no differentiation with regard to the production country when it comes to sharing information about FWF and also signing of the FWF CoLP. In Poland new suppliers were visited by agents. Triaz meets agents twice a year (and trained them on the FWF CoLP and FWF membership requirements).

Triaz could show it checked if the FWF CoLP was posted on the wall at two new suppliers in Poland and one in Germany.

2.9 External brands resold by the affiliate who have completed and returned the external brand questionnaire. (% of external sales volume)	99%	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.	3	3	0
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Comment: The Triaz Group sells five own labels: Waschbär, Enna (Triaz's own brand for basics), Vivanda, Grünheld and Minibär which cover roughly 40% per cent of the textile turnover. Roughly 60% of the textiles sold by Triaz is produced by external suppliers (products where other brands labels are used). External suppliers have to sign the questionnaire on social standards, same as own suppliers. External suppliers have to be as transparent with regard to production site information and data, just like own suppliers (which is even more than FWF requires).

2.10 External brands resold by affiliates that are members of another credible initiative. (% of external sales volume)	5%	FWF believes affiliates who resell products should be rewarded for choosing to stock external brands who also take their supply chain responsibilities seriously.	External production data in FWF's information management system. Documentation of sales volumes of products made by FWF or FLA members.	0	3	0
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Comment: Triaz sources at several FWF members, one external supplier is member of Fair Labour Association (FLA). Knowing that all of them account for only a small amount of the purchasing volume of external brands resold, Triaz has started to audit production sites of external suppliers in addition to own suppliers since 2013/14. In addition, Triaz promotes their external suppliers actively to become member of FWF.

MONITORING AND REMEDIATION

Possible Points: 32

Earned Points: 23

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		

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

Comment: Triaz has a designated person to handle complaints of workers. There is an internal procedure on paper on how to handle complaints. In 2014 Triaz handled two complaints that came in at external suppliers' production locations (so not by direct own suppliers of Triaz). Both complaints are closed and reports can be found on the FWF website.

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
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Comment: Whether the Code of Labour Practice is posted at the production sites is checked by requesting pictures of the posted document and during regular visits by staff, intermediaries or agents. Checks include whether the information sheet for workers contain the correct complaints handler phone numbers.

3.3 Percentage of FWF-audited factories where at least half of workers are aware of the FWF worker helpline.	92%	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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Recommendation: In addition to sending the worker information sheet, member companies can use the worker information cards available for download on FWF's website, in addition to promoting the Workplace Education Program trainings.

Comment: In 2014 FWF audited 3 own suppliers, of which workers at one smaller supplier in Tunisia were not aware of the FWF worker helpline. A WEP will be planned here in the year 2015. At the other 2 bigger suppliers, workers were aware.

In 2014, FWF also did two monitoring audits for Triaz in India at two external suppliers' suppliers. These do not count for the monitoring threshold, since it is not required by FWF. In both of these audits, workers were found not to be aware of the FWF worker helpline. At both, WEP training was straight away implemented at the two external suppliers' production locations.

3.4 All complaints received from factory workers are addressed in accordance with the FWF Complaints Procedure	No complaints received	Providing access to remedy when problems arise is a key element of responsible supply chain management. Affiliate involvement is often essential to resolving issues.	Documentation that affiliate has completed all required steps in the complaints handling process.	N/A	6	-2
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Comment: Complaints at own suppliers filed in 2014 were related to one new supplier. At the time of the complaints Triaz was not yet (known to be) sourcing at this supplier. Before Triaz started sourcing here late 2014, the complaints were already addressed by another FWF member. Now that the members found the supplier is a shared supplier, the follow-up of the complaint will be done on behalf of both brands by the other FWF member (because of its earlier involvement). Triaz actively cooperates with the other FWF member brand.

Triaz addressed 2 complaints with external suppliers' suppliers in India, one complaint concerned a production location shared with another FWF member. Both complaints are now closed and complaint reports can be found on the FWF website.

3.5 Cooperation with other customers in addressing worker complaints at shared suppliers	Active cooperation	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.	2	2	-2
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Comment: Triaz actively cooperates with other FWF members on addressing complaints at shared suppliers, both own suppliers and external suppliers. See 3.4.

COMPLAINTS HANDLING

Possible Points: 9

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

Comment: In 2014 the e-commerce department was trained by CSR staff how to correctly explain FWF membership, not referring to certification. The communication department always checks publications with CSR staff and Triaz makes sure it does not place the FWF logo near garments in the catalogs.

Triaz has a staff newsletter every month, where news on FWF is included: e.g. participation in FWF stakeholder meetings or the Annual Conference.

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: CSR and purchasers are working closely together to follow up on corrective action plans at the suppliers. CSR staff of Triaz has regular meetings with purchasing staff. Those meetings take place every three months and explicitly address evaluation of social standards at the production sites. Briefs are prepared to show how the agent and the suppliers perform. Purchasing staff, as well as the CEO, attended the agent training given by FWF. This showed agents the relevance which Triaz attaches to social standards.

4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices.	Yes + actively support CoLP	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.	2	2	-2
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Comment: Agents and intermediaries have been systematically informed about FWF. Agents are responsible to help Triaz with factory communication, filling in the questionnaire and implementation of corrective actions following audits or complaints. In 2014, Triaz provided a training to its suppliers, where an FWF representative was invited to present relevant issues on social standards. The head of purchasing from Triaz attended the training to show its relevance for Triaz.

4.4 Factory participation in Workplace Education Programme (where WEP is offered; by production volume)	74%	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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Recommendation: Triaz is recommended to motivate its main supplier(s) to join WEP trainings in countries where FWF just started to provide WEP trainings, like Macedonia, Tunisia and Romania.

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: FWF recommends affiliates to arrange trainings on their own in areas where the Workplace Education Programme is not yet offered. Trainings must meet FWF quality standards to receive credit for this indicator.

TRAINING AND CAPACITY BUILDING

Possible Points: 15

Earned Points: 11

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: FWF recommends Triaz to specifically address in the factory questionnaire the requirement to post the FWF CoLP on the wall at subcontractors and seek proof of this.

Comment: Triaz makes considerable effort to identify all production locations of own suppliers. Moreover, even though this is not required by FWF, Triaz also requests external suppliers to share all their production locations.

Suppliers in risk countries are discussed with buyers who are asked to take a look and check if factory capacity can be related to production volumes.

The Triaz factory questionnaire specifically collects information about subcontractors. In case production is subcontracted the supplier has to indicate what production processes this concerns, they need to name the subcontractors and also name contact details. The subcontractors also have to sign the FWF Code of Labour Practice.

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: Information regarding code compliance is integrated in the overall assessment of the supplier. CSR works closely together with purchasing staff and other departments discussing jointly the supplier rating assessments and risks related to suppliers.

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: Triaz informs the public about its FWF membership online at its websites and catalogs in accordance with FWF communications policy. Newsletters to customers included details related to social standards. Social media such as facebook is included in communication about FWF related issues. In 2014 the FWF banner was displayed at fairs in Stuttgart (fair trade fair), Heldenmarkt, Berlin, Frankfurt, Linz.

All staff is trained. Extra training is provided to departments which have an active role in addressing FWF membership requirements and needs to suppliers, such as purchasing, and those departments which need to be able to explain FWF membership to consumers, such as E-Commerce.

6.2 Affiliate engages in advanced reporting activities	Yes	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.	1	1	0
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Comment: Triaz publishes its Brand Performance Check Report, as well as its social report, on all its international brands websites. E.g. the Dutch website of its brand Waschbaer:
<http://www.waschbaer.nl/FairWearFoundation--25204d.html>

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 is well structured and gives information in a transparent manner. The Social Report is submitted to FWF and is published on Triaz's brands' website (Waeschbar, Vivanda).

TRANSPARENCY

Possible Points: 4

Earned Points: 4

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 the meetings every three months where the status of implementation of social standards per supplier are discussed in detail. Triaz sees FWF membership as crucial for the company. There is no additional meeting where the membership itself is evaluated.

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

1. Make a more indepth questionnaire for factories than the existing one (Triaz developed its own 2nd questionnaire with more indepth questions, could be an example for others / FWF to make the existing questionnaire more indepth).
2. Make work with external suppliers more relevant / make an indicator in Brand Performance Check and make it N/A for brands that do not have external suppliers.
3. To rate in the Brand Performance Check somehow if suppliers have some kind of social engagement, be BSCI certified, GOTS certified (does have OHS implications). Could be mentioned as positive aspect, even though it does not count for the threshold.
4. Communication:
 - a) FWF should communicate to FWF members well in advance those FWF activities which are open for participation, such as in-production-country stakeholder seminars and FWF presentations at external public conferences. So FWF members/suppliers are able to participate if they wish.
 - b) Reports on FWF pilots / activities / country reports, like the Macedonia project, are to be actively shared wider with all affiliates

SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	32	41
Monitoring and Remediation	23	32
Complaints Handling	9	9
Training and Capacity Building	11	15
Information Management	7	7
Transparency	4	4
Evaluation	2	2
Totals:	88	110

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

80

PERFORMANCE BENCHMARKING CATEGORY

Leader

BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

11-05-2015

Conducted by:

Ruth Vermeulen

Interviews with:

Barbara Engel (PR & Sustainability Management Textiles)

Hannah Leicht (Assistance Sustainability Management Textiles)

Katharina Hupfer (Brand Manager Waschbaer, member of Board and Head of Purchasing Triaz Group)

Martina Becker (Head of Re-Buying, incl. production planning)

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.