



BRAND PERFORMANCE CHECK

Uniform Brands B.V. (Crown East)

PUBLICATION DATE: AUGUST 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

Uniform Brands B.V. (Crown East)

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

AFFILIATE INFORMATION	
Headquarters:	Doetinchem, Netherlands
Member since:	01-05-2008
Product types:	Workwear
Production in countries where FWF is active:	Bangladesh, China, Tunisia
Production in other countries:	Hungary, 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	85%
Benchmarking score	48
Category	Needs Improvement

Summary:

Uniform Brands Europe has shown insufficient progress in implementing FWFs management system requirements in its past financial year (July 2013 to December 2014). It has a monitoring percentage of 85%, which is below the required monitoring threshold for members who have been a member for more than three years. The score of 48 is also below the required score of 50 to attain the 'Good' designation.

The majority of Uniform Brands Europe's production takes place in Tunisia, with significant production also taking place in low-risk countries Hungary and Portugal. In 2014, a number of audits were carried out in Tunisia, which raised the monitoring percentage, but this was not enough to meet the required monitoring threshold.

In terms of monitoring and remediation of working conditions, Uniform Brands Europe has undertaken some efforts to follow up the audit report, albeit not in a timely manner. Other audits were not able to be followed up on due to the stoppage of production there. Uniform Brands Europe also has production in China and Bangladesh, but did not undertake efforts to monitor and/or remediate the working conditions there, apart from an unclear due diligence process initiated by its agent.

FWF encourages Uniform Brands Europe to ensure that the monitoring threshold is met in 2015, to take adequate steps to remediate working conditions and to ensure that the suppliers located in China and Bangladesh are also monitored 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	75%	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: Uniform Brands Europe sources about 75% of its production from suppliers where it has significant leverage.

1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years	78%	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: Uniform Brands Europe has a long-lasting relationship with the majority of 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: Uniform Brands Europe requires its new suppliers to sign and return the Code of Labour Practices.

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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Requirement: Due diligence reporting should be standardized for potential new factories.

Comment: Uniform Brands Europe started production at a number of new production facilities in 2014. In the selection of new production locations, there is some due diligence conducted. This is done by an agent that it trusts. This agent checks working conditions at potential new factories. The reporting on due diligence is not standardized and therefore difficult to evaluate.

1.5 Supplier compliance with Code of Labour Practices is evaluated in a systematic manner.	No	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.	0	2	0
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Requirement: A systematic approach is required to integrate social compliance into normal business processes, and supports good decision-making. The approach needs to ensure that Uniform Brands Europe consistently evaluates the entire supplier base and includes information into decision-making procedures.

Comment: Uniform Brands Europe does not have a systematic manner of ensuring social compliance evaluation at its suppliers. This is unchanged from the previous Brand Performance Check in 2013.

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 encourages Uniform Brands Europe to establish a production planning system tailored to the situation in China and Bangladesh that supports reasonable working hours.

It is advised to establish a system for sharing and updating forecasts with suppliers to facilitate their planning. The system may include assurance of early delivery of materials and trimmings to suppliers, ensuring samples are approved in time and that late changes are discussed with the supplier.

Comment: The majority of Uniform Brands Europe’s production (70%) takes place in Tunisia, where it has a factory that is part of the same group, with a number of satellite production facilities located in the vicinity. For these factories, it knows what the standard working minutes are for each product. This, in combination with knowing the production capacity, allows Uniform Brands Europe to plan production in a way that avoids overtime. If there is insufficient production capacity at its own supplier, orders are outsourced to one of the satellite production facilities. Recent audits at both the main supplier and satellite factories show that excessive overtime is not an issue. During the low season, workers actually worked reduced hours.

For the production location in Hungary, it also works with standard working minutes. For the Portuguese supplier, Uniform Brands Europe asks for an estimate on when the products can be delivered. Both of these production locations are located in low-risk countries, meaning that audits are not necessary as local institutions are capable of protecting workers’ rights.

For these production locations, Uniform Brands Europe has a strong, integrated system in place to support reasonable working hours.

However, in 2014 it also placed some production at production locations in China and Bangladesh. In these countries, workers in the garment industry are a high risk of working excessive overtime. As far as FWF could ascertain, Uniform Brands Europe did not undertake efforts to mitigate the very real risks related to overtime, and for this reason, full points cannot be awarded.

1.7 Degree to which affiliate mitigates root causes of excessive overtime.	No production problems documented.	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.	N/A	6	0
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Comment: As mentioned above, recent audits at its production facilities in Tunisia did not indicate any problems related to excessive overtime.

1.8 Affiliate's pricing policy allows for payment of at least the legal minimum wages in production countries.	Country-level policy	The first step towards ensuring the payment of minimum wages - and towards implementation of living wages - is to know 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: At a minimum, Uniform Brands Europe is recommended to investigate wages levels in production countries, among others by making use of FWFs Wage Ladder and country studies. As an advanced step, increased transparency in costing and productivity gives insight in the labour costs per product. This forms the basis for ensuring enough is paid to cover at least minimum wage and for making steps towards living wages.

Comment: Uniform Brands Europe knows the working minutes required for each product-style, and also the working minute price with a price surcharge or discount depending on the order volume. In 2014, Uniform Brands Europe's own production facility in Tunisia raised the working minute prices based on an increase in the legal minimum wages.

What proportion of the working minutes is related to labour costs is, as far as FWF can ascertain, not known. In addition to this, Uniform Brands Europe did not take steps to ensure the payment of legal minimum wages in its production facilities located in China and Bangladesh.

For these reasons, full points cannot be awarded.

1.9 Affiliate actively responds if suppliers fail to pay legal minimum wages.	No	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
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Requirement: If a supplier fails to pay minimum wages, FWF affiliates are expected to hold management of the supplier accountable for respecting local labour law and require a time bound action plan to ensure adequate payment.

Comment: At two of the satellite production facilities, FWF verification audits showed that some workers received net less than legal minimum wages. These findings were not followed up on adequately and in a time/bound manner. In the meantime, Uniform Brands Europe has stopped working with these factories for various reasons.

1.10 Evidence of late payments to suppliers by affiliate.	No	Late payments to suppliers can have a negative impact on factories and their ability to pay workers on time. Most garment workers have minimal savings, and even a brief delay in payments can cause serious problems.	Based on a complaint or audit report; review of factory and affiliate financial documents.	0	0	-1
1.11 Degree to which affiliate assesses root causes of wages lower than living wages with suppliers and takes steps towards the implementation of living wages.	Basic approach	Sustained progress towards living wages requires adjustments to affiliates' policies.	Documentation of policy assessments and/or concrete progress towards living wages.	2	8	0

Requirement: Uniform Brands Europe is expected to take an active role in discussing living wages with its suppliers. The FWF wage ladder can be used as a tool to implement living wages. Most relevant wage estimates, such as local minimum wage, Asia Floor Wage, collective bargaining wage and industrial best practice wages are provided in the wage ladder. The wage ladder is included in FWF's audit reports. It demonstrates the gaps between workers' wages at a factory and living wages demanded by major stakeholders. The wage ladder can be used to document, monitor, negotiate and evaluate the improvements at its suppliers.

Comment: As mentioned above, Uniform Brands Europe did increase the working minute price paid to its main supplier in Tunisia due to the increase of legal minimum wage. Other than this, however, no steps were taken to address the roots causes of wages being lower than living wages.

This also counts for the suppliers located in China and Bangladesh, where the risk of workers earning below legal minimum wage is significant.

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

Comment: Uniform Brands Europe's main supplier is owned by the same holding, but it does not own this production facility itself.

PURCHASING PRACTICES

Possible Points: 34

Earned Points: 18

2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	59%	
% of own production in low risk production countries where FWF's Low Risk policy has been implemented	24%	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	85%	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: Uniform Brands Europe should invest more effort into remediation of the existing Corrective Action Plans. FWF also encourages the company to avoid stopping production orders at a production location a short time after the audit has taken place, as it impedes the CAP remediation process.

Comment: At the end of 2014, Uniform Brands Europe discussed the most recent audit findings with its main supplier in Tunisia. Some easier issues such as adding more fire extinguishers in certain areas were addressed and had been resolved.

Uniform Brands Europe itself indicated that the most important issue discussed during the meeting was that management had to ensure that the Consultative Committee informs workers about FWF and their rights.

The other audits were conducted at factories where Uniform Brands Europe no longer sources at, so the possibilities to remediate CAP issues were unfortunately rather limited.

2.3 Percentage of production volume from suppliers that have been visited by the affiliate in the past financial year	77%	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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Recommendation: Annual visits should be made for production sites (including subcontractors and production locations in low-risk countries), but especially production sites located in China and Bangladesh. Regular visits provide the opportunities to discuss problems and corrective actions in the time period between formal audits.

Comment: Uniform Brands Europe visited its production locations located in Tunisia, Portugal and Hungary. It did not visit production facilities in China or Bangladesh.

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: Existing audit reports were collected, but quality was not assessed and the CAPs not implemented.

2.5 Audit Report and Corrective Action Plan (CAP) findings are shared with factory. Improvement timelines are established in a timely manner	No	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.	-1	2	-1
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Requirement: FWF affiliate is required to share and discuss the audit report and CAP findings with the factory within 2 months. A reasonable time frame should be specified for resolving findings.

Comment: After the audit of its main supplier in December 2013, the first meeting about CAP follow-up took place at the end of 2014. There was also no follow-up of the audits conducted at two satellite factories.

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: Knowing the country specific risks facilitates the starting point for discussing this with suppliers. Uniform Brands Europe can agree on additional commitments that are required to mitigate risks. It can provide additional measures for support and integrate that in the monitoring system. For instance: lack of knowledge of factory managers in Bangladesh on the principles of fire safety means organizing management seminars.

Comment: Uniform Brands Europe has a long history of sourcing in Tunisia and tries to limit its suppliers located there as well. It is well aware of the issues that workers in this country face, and reviews audit reports with its suppliers in a summary fashion.

Uniform Brands Europe, however, has a production “tail” described earlier that is not monitored effectively and therefore the risks associated with these production locations are not addressed by its monitoring system. For this reason, full points cannot be awarded.

2.6a High risk issues specific to Bangladesh are identified and addressed by the monitoring system and remediation activities.	Insufficient 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.	0	3	0
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Requirement: Uniform Brands Europe’s monitoring system should address the specific high risk issues that are known for Bangladesh. It should ensure access to a credible fire and building safety inspection report and should ensure participation of management of production locations in Bangladesh in the FWF fire and building safety workshops.

Comment: Uniform Brands Europe does work with a trustworthy agent to select its supplier located in Bangladesh. In addition to this, the FOB over 2014 was not very high. However, no steps were taken in terms of Building & Fire Safety, as required for all FWF members sourcing in Bangladesh.

During the Brand Performance Check, a Fire & Building Safety Inspection Report was found online for its factory located in Bangladesh, and follow-up of this report was going to be initiated in 2015.

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	No CAPs active or no shared suppliers.	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.	N/A	2	-1
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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: Uniform Brands Europe visits its supplier in Portugal regularly and the Code of Labour Practices is posted and the questionnaire completed. This is also the case for the supplier in Hungary.

2.9 External brands resold by the affiliate who have completed and returned the external brand questionnaire. (% of external sales volume)	0%	FWF believes it is important for affiliates that have a retail/wholesale arm to at least know if the brands they resell are members of FWF or a similar organisation, and in which countries those brands produce goods.	Questionnaires are on file.	0	3	0
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Comment: This information was not provided.

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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Comment: This information was not provided.

MONITORING AND REMEDIATION

Possible Points: 36

Earned Points: 15

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	0	

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.1 A specific employee has been designated to address worker complaints	Yes	Followup is a serious part of FWF membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	1	1	-1
3.2 System exists to check that the Worker Information Sheet is posted in factories	No	The Worker Information Sheet is a key first step in alerting workers to their rights.	Photos by company staff, audit reports, checklists from factory visits, etc.	0	2	0

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

Comment: Uniform Brands Europe does not have a system in place to check if the Worker Information Sheets are posted, but indicates from visits that they are.

3.3 Percentage of FWF-audited factories where at least half of workers are aware of the FWF worker helpline.	0%	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
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Requirement: Uniform Brands Europe should inform the factory managers about the existence of the hotline. The affiliate should have a routine to ensure the worker information sheet with complaints handlers contact details is posted in a place freely accessible to workers. The information sheet is the first step towards awareness raising about the existence and functioning of FWFs worker hotline.

Recommendation: Uniform Brands Europe can stimulate its suppliers to participate in WEP trainings, to raise awareness about the existence and the functioning of FWF's worker hotline. In addition to sending the worker information sheet, affiliates can use the worker information cards available for download on FWF's website.

Comment: At all audits conducted at production locations in Tunisia, workers were not aware of FWF CoLP and complaints procedure.

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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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: 7

Earned Points: -1

4. TRAINING AND CAPACITY BUILDING

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.1 All staff is made aware of FWF membership requirements	Yes	Preventing and remediating problems often requires the involvement of many different departments; making all staff aware of FWF membership requirements helps to support cross-departmental collaboration when needed.	Emails, trainings, presentation, newsletters, etc.	1	1	-1
4.2 Ongoing training in support of FWF requirements is provided to staff in direct contact with suppliers.	No	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.	0	2	0

Recommendation: FWF encourages purchasing staff or agents to observe factory audits by FWF audit teams to learn about the audit process and to be able to better follow up on corrective action plans.

A training session on labour standards can be held for purchasing staff. FWF can support or facilitate in providing trainings. In addition, it is recommended to actively take part in training opportunities FWF offers such as: FWF seminars, the FWF annual conference and webinars.

Comment: In 2014, Uniform Brands Europe did not provide training to support relevant staff on meeting FWF requirements and social compliance issues.

4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices.	Yes	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.	1	2	-2
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Requirement: Uniform Brands Europe needs to ensure agents are aware of FWF requirements and actively support the implementation of the CoLP.

Comment: UB works with an agent with which it has a long relationship and he is aware of the requirements related to working conditions, but he is not in charge of making sure the FWF requirements are met.

4.4 Factory participation in Workplace Education Programme (where WEP is offered; by production volume)	0%	Lack of knowledge and skills on best practices related to labour standards is 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.	0	6	0
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Recommendation: In order to ensure awareness and enhance understanding of the relevant labour standards, grievance mechanisms and the importance of a good mechanism for communication between employers and workers in the workplace, FWF developed the Workplace Education Programme.

Comment: Uniform Brands Europe has not initiated a WEP training session at its production facilities located in China and Bangladesh.

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: In order to ensure awareness and enhance understanding of the relevant labour standards, grievance mechanisms and the importance of a good mechanism for communication between employers and workers in the workplace, FWF developed the Workplace Education Programme.

Comment: Uniform Brands Europe has not initiated a WEP training session in Tunisia yet, but this option has been available since 2014.

TRAINING AND CAPACITY BUILDING

Possible Points: 11

Earned Points: 2

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 Uniform Brands Europe to check whether the production locations in Bangladesh and China are not making use of subcontractors.

Comment: Uniform Brands Europe has included all production locations in its supplier register, including the satellite factories of its main supplier in Tunisia.

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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Recommendation: It is advised to make relevant staff aware of the available tools FWF offers, such as the Health and Safety guides, monitoring CAP documents, access to FWF's online information system. Purchasing staff is recommended to share reports from factory visits that include a status update of implementing the CoLP.

Comment: There is a folder on the server where FWF information is stored.

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: Uniform Brands Europe communicates about FWF on its website, and adheres to its communications policy.

6.2 Affiliate engages in advanced reporting activities	No	Good reporting by members helps to ensure the transparency of FWF's work and shares best practices with the industry.	Affiliate publishes one or more of the following on their website: Brand Performance Check, Audit Reports, Supplier List.	0	1	0
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Recommendation: FWF recommends Uniform Brands Europe to publish one or more of the following reports on its website: brand performance check, audit reports, supplier information. Good reporting by members helps to ensure the transparency of the affiliate and FWF's work.

Comment: Uniform Brands Europe does not engage in advanced reporting activities.

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 2014 is submitted to FWF and published on its website.

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: The person responsible for FWF membership is part of the management team.

7.2 Changes from previous Brand Performance Check implemented by affiliate	67%	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
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Requirement: It is required to work towards remediation of previous requirements from the last Brand Performance Check. Further engagement needs to be taken with regard to the following requirements mentioned in the last Brand Performance Check.

Comment: In its previous Brand Performance Check, Uniform Brands Europe had three requirements. It followed up on two of them:

- increasing the monitoring percentage from less than 50% to 85%;
- communicating about FWF on its website and publishing its Social Report.

It did not follow up on the requirement related to following up on audits in a timely manner, as indicated earlier.

EVALUATION

Possible Points: 6

Earned Points: 6

RECOMMENDATIONS TO FWF

SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	18	34
Monitoring and Remediation	15	36
Complaints Handling	-1	7
Training and Capacity Building	2	11
Information Management	7	7
Transparency	3	4
Evaluation	6	6
Totals:	50	105

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

48

PERFORMANCE BENCHMARKING CATEGORY

Needs Improvement

BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

04-06-2015

Conducted by:

Kees Gootjes

Interviews with:

Ruud Wissink, Director Finance, IT & Logistics

Peter Goeijer, Senior Manager Production, Buying and Collections

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.