

BRAND PERFORMANCE CHECK

Outdoor & Sports Company Ltd.

this report covers the evaluation period 01-01-2013 to 31-12-2013

ABOUT THE BRAND PERFORMANCE CHECK

Fair Wear Foundation believes that improving conditions for apparel factory workers requires change at multiple levels. Traditional efforts to improve conditions focus primarily on the factory. FWF, however, believes that the management decisions of the 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.

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.

Improvement of supply chains is a step-by-step process, through which affiliates must address many different issues. FWF affiliates vary greatly in management structures, and have different strengths. The Performance Benchmarking system is designed to reflect these differences, and the many different ways that a company can support better working conditions.

During the Brand Performance Check, FWF staff speak to various employees at the affiliate who have important roles to play in the management of supply chains. FWF verifies the actions of affiliates based on several sources including documentation of activities, financial records, the affiliate's supplier register and staff interviews. Following the Brand Performance Check, FWF summarizes findings in this report, which is made public via www.fairwear.org. The <u>Brand Performance Check Guide</u> provides more information about the indicators and is available for download.

BRAND PERFORMANCE CHECK OVERVIEW

Outdoor & Sports Company Ltd.

Evaluation Period: 01-01-2013 to 31-12-2013

AFFILIATE INFORMATION	
Headquarters:	Cheshire, United Kingdom
Member since:	01-07-2012
Product types:	Sportswear
Production in countries where FWF is active:	Bulgaria, China, India, Lithuania, Ukraine
Production in other countries:	Hungary, Indonesia, Taiwan, United Arab Emirates
BASIC REQUIREMENTS	
Workplan for this evaluation period was submitted?	Yes
Actual supplier register for this evaluation period has been submitted?	Yes
Membership fee has been paid?	Yes
All suppliers have been notified of FWF membership?	Yes
SCORING OVERVIEW	
% of own production under monitoring	56%
Benchmarking score	67
Category	Good

Summary:

Outdoor & Sports Company (OSC) meets most of FWFs management system requirements. With a current monitoring percentage of 56%, it is just below the monitoring threshold required for affiliates after a second performance check. Due to OSC moving its financial year from July-June to January-December, it has 6 months less time to meet the required threshold.

As OSC scores well within the Good category and has plans in place to meet the monitoring threshold, FWF has awarded a Good rating.

When it comes to purchasing practices, OSC has the elements in place to work effectively towards the improvement of working conditions by eg. making sure the Code of Labour Practices is kept posted in all factories and by maintaining or extending lead times. More complex issues such as overtime and wage levels will take more time, and OSC is committed to improvement for these elements as well.

In terms of monitoring, OSC follows up its audits effectively and has a system to discuss and update corrective actions during factory visits. In addition, it also organized one WEP training session at a supplier and is advised to enroll more suppliers in the coming years.

It received and, in cooperation with the supplier, resolved 1 complaint in 2013.

PERFORMANCE CATEGORY OVERVIEW

Leader: This category is for affiliates who are doing exceptionally well, and are operating at an advanced level.

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	47%	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.	2	4	0

Comment: Outdoor & Sports Company Ltd. (OSC) sources almost half of its 2013 production volume from factories where it has significant leverage.

1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years	68%	Stable business relationships support most aspects of the Code of Labour Practices, and give factories a reason to invest in improving working conditions.	Supplier information provided by affiliate.	3	4	0
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Comment: Almost 70% of OSC's FOB in 2013 came from suppliers where a business relationship has existed for at least five years.

1.3 All new suppliers are required to sign and return the Code of Labour Practices before first orders are placed.	No new suppliers	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.	N/A	2	0	
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Comment: OSC did not begin production at any new suppliers in 2013.

9	new ppliers	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	N/A	4	0
			assessments.			

Recommendation: A risk analysis as part of the decision-making process of selecting new suppliers is an important step to mitigate risk and prevent potential problems. FWF recommends OSC to assess the risks associated with operating in specific production areas. FWF advises to use information from FWF country studies and wage ladders. OSC can also cooperate with local stakeholders to further investigate the situation in a specific country.

Comment: Even though there was no actual production at new suppliers in 2013, OSC was very active in its search for new suppliers for future production.

After a sampling and pricing programme, a factory visit takes place. During this visit, OSC establishes whether the supplier conforms to supplier guidelines and meets its ethical standards.

During this visit, FWF membership and the factory's willingness to be audited by FWF's audit team are also discussed.

OSC is looking to increasingly source in countries such as Vietnam and Myanmar, where there are very specific risks that need to be taken into consideration.

1.5 Supplier compliance with Code of Labour Practices is evaluated in a systematic manner.	social compliance in	nto normal business sorts good decisionmaking.	Documentation of systemic approach: rating systems, checklists, databases, etc.	1	2	0
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Comment: OSC has introduced FWF, the CoLP and following up on CAPs into its business process. For quality purposes, OSC prefers to have longterm relationships with its suppliers once it has started sourcing at a particular location. An ongoing part of this relationship is social compliance improvement.

1.6 The affiliate's production planning systems support reasonable working hours.	Strong, integrated systems in place.	Affiliate production planning systems can have a significant impact on the levels of excessive overtime at factories.	Documentation of robust planning systems.	4	4	0	
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Comment: In general, lead times for production is around 4-5 months. OSC tries to get forecasts out as soon as possible and offers incentives for early order placement. In addition to this, it also works with split order so that the supplier receives information earlier.

From the time fabric arrives at the supplier, a lead time of 2 months is given.

For new styles appearing in future seasons, OSC trial-runs styles a season earlier to see if and when problems occur in the production process. There are always delays during these trial runs, and the lessons learned during this process allows OSC to have a smoother production process when the new style is produced on a larger scale.

1.7 Degree to which affiliate mitigates root causes of excessive overtime. Intermediate efforts	Some production delays are outside of the control of affiliates; however there are a number of steps that can be taken to address production delays without resorting to excessive overtime.	Documentation of root cause analysis and positive steps taken to manage production delays or improve factory processes.	6	0	
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Recommendation: A root cause analysis of excessive overtime can be done to investigate which steps can be most effective to reduce overtime.

Comment: OSC, as part of its standard business practice, always reviews the previous season with suppliers to see where production improvements can be made and better streamlined. This could be on a product level or on a factory level.

The OSC technical team also is also travelling more frequently to production locations to avoid and resolve production issues on site.

In the future, OSC will expand its Product Lifecycle Management system to include factories so that better forecasts and realtime information can be gained.

In terms of mitigating root causes of overtime, OSC has started addressing this with suppliers. This is an ongoing process that will need more attention in order to gain more progress.

In 2013, one audit indicated issues with lead times and last-minute changes. As a response to this, an extra three weeks was built into the production process to counter the possible late delivery of materials. In addition to this, the technical team was increased to be able to get product specifications out earlier and strict(er) deadlines were maintained.

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	
		the tabout costs of garments.	or country/city tevet.				

Recommendation: As an advanced step, increased transparency in costing and productivity gives insight in the labour costs per product. This forms the basis for ensuring enough is paid to cover at least minimum wage and for making steps towards living wages.

Comment: In general, OSC is aware of wage levels on a country level. Target pricing levels are established based on past levels and in negotiation with the supplier.

OSC currently does not have a link between style pricing and wage levels of factory workers.

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

1.11 Degree to which affiliate assesses root	Basic	Sustained progress towards living wages	Documentation of	2	8	0
causes of wages lower than living wages with	approach	requires adjustments to affiliates' policies.	policy assessments			
suppliers and takes steps towards the			and/or concrete			
implementation of living wages.			progress towards			
			living wages.			

Recommendation: FWF encourages OSC to discuss with suppliers about possibilities to work towards higher benchmarks. FWF has developed experience with approaches that ensure that production workers in the selected facility take full benefit from the additional amounts that are committed to wage increases. FWF could give companies specific guidance on process rollout on request.

FWF encourages OSC to assess the hypothetical cost effects of increasing wages towards benchmarks that are included in the wage ladder. To support companies in this process, FWF has developed a calculation model that estimates the effect on FOB and retail prices under different pricing models.

Comment: As mentioned earlier, FWF and social compliance is now on the agenda of every meeting that OSC representatives have with the management of suppliers. On a complex issue such as living wages, more discussions and a long-term relationship remain essential.

OSC sees this issue as longterm and is working to establish ways to gain ground on wage levels.

1.12 Affiliate sources from an FWF factory member.	No	When possible, FWF encourages affiliates to source from FWF factory members. On account of the small number of factories this is a 'bonus' indicator. Extra points are possible, but the indicator will not negatively affect an affiliate's score.	Supplier information provided by affiliate.	N/A	1	0
1.13 Percentage of production volume from factories owned by the affiliate.	None	Owning a supplier increases the accountability and reduces the risk of unexpected CoLP violations. Given these advantages, this is a bonus indicator. Extra points are possible, but the indicator will not negatively affect an affiliate's score.	Supplier information provided by affiliate.	N/A	2	0

PURCHASING PRACTICES

Possible Points: 34

2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	52%	
% of own production in low risk production countries where FWF's Low Risk policy has been implemented	4%	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	56%	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: To facilitate remediation, the affiliate could consider:

- Hire a local consultant to assist factory in developing an action plan and to assist factory management in investigating root causes.
- Organise supplier seminars.
- Provide factory training.
- Share knowledge/material.

Comment: OSC has taken steps to address the CAPs resulting from the audits, and schedules factory visits a short time after audits have taken place so that the relevant issues can be discussed. CAPs are also on the agenda for every subsequent factory visit.

When it comes to the more complex issues such as overtime and wage levels, OSC sees this as more longterm issues that need time to address and overcome. Progress, therefore, has been limited for these elements.

Comment: OSC works to visit its suppliers on a regular basis.

2.4 Existing audit reports from other sources are collected.	Yes	Existing reports form a basis for understanding the issues and strengths of a supplier, and reduces duplicative work.	Audit reports are on file; evidence of followup on prior CAPs. Reports of quality assessments.	1	3	0
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Recommendation: Existing reports form a basis for understanding the issues and strengths of a supplier, and reduces double work. Existing audits can be counted towards the monitoring threshold if the quality of the report is assessed using the FWF audit quality tool and corrective actions are implemented.

Comment: OSC collects existing audit reports, but currently does not assess the quality of these reports.

2.5 Audit Report and Corrective Action Plan (CAP) findings are shared with factory. Improvement timelines are established in a timely manner	Yes	FWF audit reports should be shared and discussed with suppliers within two months of audit receipt. Timely sharing of information and agreement on corrective actions is essential for improvement. A reasonable time frame should be specified for resolving findings.	Corrective Action Plans, emails; findings of followup audits; brand representative present during audit exit meeting, etc.	2	2	-1	
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2.6 High risk issues specific to the affiliate's supply chain are identified and addressed by the monitoring system.	Different countries and products have different risks associated with them; monitoring systems should be adapated to allow appropriate human rights due diligence for the specific risks in each affiliates' supply chain.	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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Requirement: OSC's monitoring system should identify and address high risk issues that are specific to its sourcing practices. FWF provides policies and country-specific requirements to affiliates. Priorities in remediation efforts are guided by these policies.

This is especially relevant for Myanmar, where FWF has additional requirements for its members sourcing there.

Comment: OSC is aware of many of the high risk issues specific to its supply chain and the countries where it sources. As OSC is looking to start production in Myanmar, it has been to visit the country and potential production location in order to gain insight into the working conditions there.

OSC has also followed the developments of FWF's enhanced monitoring program in Bangladesh even though it is currently not sourcing there.

This is, however, not yet part of a structured system where the relevant risks are reviewed and updated on a regular basis for the countries and regions where it currently produces and is in the future looking to produce.

2.7 Affiliate cooperates with other customers in resolving corrective actions at shared suppliers	Active cooperation	Cooperation between customers increases leverage and chances of successful outcomes. Cooperation also reduces the changes of a factory having to conduct multiple Corrective Action Plans about the same issue with multiple customers.	Shared CAPs, evidence of cooperation with other customers.	2	2	-1
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Comment: OSC has a policy to share audits wherever possible and in 2013 also cooperated with another outdoor brand on initiating an audit and the follow-up.

2.8 Monitoring requirements are fulfilled for production in low-risk countries	Yes	Low risk countries are determined by the presence and proper functioning of institutions which can guarantee compliance with basic standards.	Documentation of visits, notification of suppliers of FWF membership; posting of worker information sheets, completed questionnaires.	2	2	0
2.9 External brands resold by the affiliate who have completed and returned the external brand questionnaire. (% of external sales volume)	No external brands resold	FWF believes it is important for affiliates that have a retail/wholesale arm to at least know if the brands they resell are members of FWF or a similar organisation, and in which countries those brands produce goods.	Questionnaires are on file.	N/A	3	0
2.10 External brands resold by affiliates that are members of another credible initiative. (% of external sales volume)	No external brands resold	FWF believes affiliates who resell products should be rewarded for choosing to stock external brands who also take their supply chain responsibilities seriously.	Supplier register; Documentation of sales volumes of products made by FWF or FLA members.	N/A	3	0

MONITORING AND REMEDIATION

Possible Points: 29

3. COMPLAINTS HANDLING

BASIC MEASUREMENTS	RESULT	COMMENTS
Number of worker complaints received since last check	1	At this point, FWF considers a high number of complaints as a positive indicator, as it shows that workers are aware of and making use of the complaints system.
Number of worker complaints in process of being resolved	0	
Number of worker complaints resolved since last check	1	

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.1 A specific employee has been designated to address worker complaints	Yes	Followup is a serious part of FWF membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	1	1	-1
3.2 System exists to check that the Worker Information Sheet is posted in factories	Yes	The Worker Information Sheet is a key first step in alerting workers to their rights.	Photos by company staff, audit reports, checklists from factory visits, etc.	2	2	0
3.3 Percentage of FWF-audited factories where at least half of workers are aware of the FWF worker helpline.	33%	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

Recommendation: OSC 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: Workers accounting for about 37% of the audited and trained volume in 2013 indicated that they were aware of the FWF worker helpline.

3.4 All complaints received from factory workers are addressed in accordance with the FWF Complaints Procedure	Yes + Preventive steps taken	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.	6	6	-2	
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Comment: The 1 complaint that OSC received had to do with incorrect payslip deductions. These deductions were stopped and an agreement was made to have the past incorrect deductions given back to workers.

3.5 Cooperation with other customers in addressing worker complaints at shared suppliers	No complaints or cooperation not possible / necessary.	Because most factories supply several customers with products, involvement of other customers by the FWF affiliate can be critical in resolving a complaint at a supplier.	Documentation of joint efforts, e.g. emails, sharing of complaint data, etc.	N/A	2	-2	
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COMPLAINTS HANDLING

Possible Points: 13

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.	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

Comment: Relevant staff at OSC are made aware of FWF requirements by way of presentations and bilateral meetings.

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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Comment: OSC prefers not to work with agents, and in 2014 will not have anymore agents that it works with.

4.4 Factory participation in Workplace Education Programme (where WEP is offered; by production volume)	4%	Lack of knowledge and skills on best practices related to labour standards is acommon issue in factories. Good quality training of workers and managers is a key step towards	Documentation of relevant trainings; participation in Workplace Education	1	6	0
		sustainable improvements.	Programme.			

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. This programme is offered in the 4 priority countries. OSC is encouraged to motivate its suppliers to join WEP trainings.

Comment: OSC had WEP training programs at its suppliers for the first time in 2013. This accounted for approximately 4% of the FOB over 2013.

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.	4	0
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Recommendation: Whenever the FWF affiliate contacts a new supplier, this new supplier must be informed on the implications of FWF membership. All factory workers should be informed about the labour standards and the process of monitoring and remediation. In order to further communication between employers and workers in the workplace, FWF recommends affiliates to ensure suppliers participate in trainings. Trainings must meet FWF quality standards to receive credit for this indicator: top management, supervisors and workers should be included in the trainings, separately. Workplace standards and dispute handling should be included in the training. At least 10-20% of the workforce must be trained, depending on the size of the factory. Worker participations should be balanced and representative.

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

TRAINING AND CAPACITY BUILDING

Possible Points: 15

5. INFORMATION MANAGEMENT

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
5.1 Level of effort to identify all production locations and update supplier information.	Advanced	Any improvements to supply chains require affiliates to first know all of their suppliers and 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: Affiliates are advised to develop a systematic approach to complete the supplier list. Part of the approach can be:

- 1) automatically include information from audit reports and complaints
- 2) Agreements with factories on the use of subcontractors stating clearly that when subcontractors are used, they are included in the monitoring system and information is shared on the subcontracted production process.

Comment: OSC continues to make efforts to identify all production locations, and has added subcontractor details where relevant.

5.2 A system exists to allow purchasing, CSR and other relevant staff to share information with each other about working conditions at suppliers	Yes	CSR, purchasing and other staff who interact with suppliers need to be able to share information in order to establish a coherent and effective strategy for improvements.	Internal information system; status CAPs, reports of meetings of purchasing/CSR; systematic way of storing information.	1	1	-1	
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Comment: OSC has an internal database where FWF documentation, audit reports and other information is stored. This information is accessible to all staff.

INFORMATION MANAGEMENT

Possible 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: OSC communicates clearly about FWF membership on its various brand websites.

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.	
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Recommendation: FWF recommends OSC to publish one or more of the following reports on its website: brand performance check, audit reports, supplier information. Good reporting by members helps to ensure the transparency of the affiliate and FWF's work.

Comment: OSC currently does not engage in advanced reporting activities, but is considering doing this in the future.

6.3 Social Report is submitted to FWF and is	Published on	The Social Report is an important tool for	Report adheres to	2	2	-2
published on affiliate's website	affiliate's	brands to transparently share their efforts with	FWF guidelines for			
	website	stakeholders.	Social Report content.			

Comment: OSC submitted its Social Report 2013 to FWF and also published this report on its various brand websites.

TRANSPARENCY

Possible 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: FWF membership is discussed and evaluated on a regular basis with the involvement of top management.

7.2 Percentage of required changes from previous Brand Performance Check implemented by affiliate	In each Brand Performance Check report, FWF may include requirements for changes to management practices. Adherence to these requirements is an important part of FWF membership.	Affiliate should show documentation related to the specific requirements made in the previous Brand Performance Check.	8	8	-4	
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Comment: OSC had only requirement in its previous Brand Performance Check was to publish the Social Report of the previous year, and this was implemented in 2013.

EVALUATION

Possible Points: 10

RECOMMENDATIONS TO FWF

N/A

SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	19	34
Monitoring and Remediation	20	29
Complaints Handling	11	13
Training and Capacity Building	5	15
Information Management	7	7
Transparency	3	4
Evaluation	10	10
Totals:	75	112

BENCHMARKING SCORE (EARNED POINTS + POSSIBLE POINTS)

67

PERFORMANCE BENCHMARKING CATEGORY

Good

BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

19-06-2014

Conducted by:

Kees Gootjes

Interviews with:

Brian Connolly, Group Sourcing Director Sarah Forte, Buying Director Mountain Equipment Steve Rothwell, Ronhill & Hilly Brand Director

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. Future Brand Performance Checks will include improved usability and transparency for audit data.