



BRAND PERFORMANCE CHECK

Outdoor & Sports Company Ltd.

PUBLICATION DATE: JULY 2016

this report covers the evaluation period 01-01-2015 to 31-12-2015

ABOUT THE BRAND PERFORMANCE CHECK

Fair Wear Foundation believes that improving conditions for apparel factory workers requires change at many levels. Traditional efforts to improve conditions focus primarily on the factory. FWF, however, believes that the management decisions of clothing brands have an enormous influence for good or ill on factory conditions.

FWF's Brand Performance Check is a tool to evaluate and report on the activities of FWF's affiliate members. The Checks examine how affiliate management systems support FWF's Code of Labour Practices. They evaluate the parts of affiliate supply chains where clothing is assembled. This is the most labour intensive part of garment supply chains, and where brands can have the most influence over working conditions.

In most apparel supply chains, clothing brands do not own factories, and most factories work for many different brands. This means that in most cases FWF affiliates have influence, but not direct control, over working conditions. As a result, the Brand Performance Checks focus primarily on verifying the efforts of affiliates. Outcomes at the factory level are assessed via audits and complaint reports, however the complexity of the supply chains means that even the best efforts of FWF affiliates cannot guarantee results.

Even if outcomes at the factory level cannot be guaranteed, the importance of good management practices by affiliates cannot be understated. Even one concerned customer at a factory can have significant positive impacts on a range of issues like health and safety conditions or freedom of association. And if one customer at a factory can demonstrate that improvements are possible, other customers no longer have an excuse not to act. The development and sharing of these types of best practices has long been a core part of FWF's work.

The Brand Performance Check system is designed to accommodate the range of structures and strengths that different companies have, and reflects the different ways that brands can support better working conditions.

This report is based on interviews with affiliate employees who play important roles in the management of supply chains, and a variety of documentation sources, financial records, supplier data. The findings from the Brand Performance Check are summarized and published at www.fairwear.org. The online [Brand Performance Check Guide](#) provides more information about the indicators.

BRAND PERFORMANCE CHECK OVERVIEW

Outdoor & Sports Company Ltd.

Evaluation Period: 01-01-2015 to 31-12-2015

AFFILIATE INFORMATION	
Headquarters:	Cheshire, United Kingdom
Member since:	01-07-2012
Product types:	Outdoor and Sportswear
Production in countries where FWF is active:	Bulgaria, China, India, Viet Nam
Production in other countries:	Hungary, Indonesia, Lithuania, Taiwan, Ukraine, United Arab Emirates
BASIC REQUIREMENTS	
Workplan and projected production location data for upcoming year have been submitted?	Yes
Actual production location data for evaluation period was submitted?	Yes
Membership fee has been paid?	Yes
All suppliers have been notified of FWF membership?	Yes
SCORING OVERVIEW	
% of own production under monitoring	93%
Benchmarking score	80
Category	Leader

Summary:

Outdoor & Sports Company (OSC) meets most of FWFs management system requirements and goes beyond. With a monitoring percentage of 93% and a score of 80, it is awarded the Leader category.

In 2015, OSC conducted a number of audits to reach the required 90% monitoring threshold. It followed up on the CAPs in an in-depth manner and also took steps to remediate more difficult issues related to overtime and living wages. It did this by initiating a root cause analysis as well as taking action to remediate overtime related to its own purchasing practices.

In addition to this, OSC organized a WEP training session at 3 factories in China in 2015, ensuring that about half of its production volume has been trained in the last three years on the FWF Code of Labour Practices, effective industrial relations and a grievance mechanism.

OSC is encouraged to continue its in-depth monitoring and remediation efforts, taking care to document its due diligence at potential new suppliers and its work related to remediating overtime and living wages issues. This is especially important in 2016 as OSC will most likely have production take place in countries where FWF has an Enhanced Monitoring Programme in place.

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	67%	Affiliates with less than 10% of a factories' production capacity generally have limited influence on factory managers to make changes.	Supplier information provided by affiliate.	3	4	0

Comment: 67% of production volume comes from suppliers where OSC is responsible for at least 10% of production capacity, a small increase from the previous year.

1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years	65%	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
--	-----	--	---	---	---	---

Comment: 65% of production was at factories where it has had a relationship for at least five years, an increase from the previous year and comparable to the year before last.

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
--	-----	---	---------------------------	---	---	---

Comment: OSC started production at 3 new suppliers in 2015. For each production location, OSC was able to show that the Code of Labour Practices was signed and posted.

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
---	-----	---	---	---	---	---

Recommendation: FWF encourages OSC to set up a policy to better document its due diligence activities at new suppliers and keep records of this process.

Comment: OSC started with a number of new suppliers in 2015. Similar to previous years, new factories are selected on the basis of the product the factory specialises in, as well as quality, price, capacity availability, communication, factory ownership, location and ethical guidelines.

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

In 2015, OSC started at a new production location for an existing supplier in China. Before production commenced, OSC did not visit the production location as it has a long-standing relationship with the supplier. The factory was, however, audited in the first few months of 2015. For the two new production locations in Vietnam, both were visited before production took place.

1.5 Supplier compliance with Code of Labour Practices is evaluated in a systematic manner.	Yes	A systemic approach is required to integrate social compliance into normal business processes, and supports good decisionmaking.	Documentation of systemic approach: rating systems, checklists, databases, etc.	1	2	0
--	-----	--	---	---	---	---

Recommendation: OSC is encouraged to develop an evaluation/grading system for suppliers where compliance with labour standards is a criterion for future order placement. Part of the system can be to create an incentive for rewarding suppliers for realised improvements in working conditions.

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

Currently, there is an evaluation of quality (returns) and timing on a monthly basis that is discussed within the management team. Social compliance issues on a supplier level are, however, not included in this evaluation.

1.6 The affiliate's production planning systems support reasonable working hours.	Strong, integrated systems in place.	Affiliate production planning systems can have a significant impact on the levels of excessive overtime at factories.	Documentation of robust planning systems.	4	4	0
---	--------------------------------------	---	---	---	---	---

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 to its customers for early order placement. In addition to this, it also works with split orders so that the supplier receives information earlier. From the time fabric arrives at the supplier, a lead time of 2 months is given. Deadlines are determined in partnership with suppliers, and after every season there is an evaluation to discuss how the production went and if there are issues that can be improved. This has all been set down in a critical path process that sets out and monitors the various production deadlines.

Based on this evaluation and a root cause analysis of overtime, OSC found that fabrics arriving from Japan have longer lead times. In response to this, OSC made a number of significant changes to remediate this finding. OSC also started a greige program that is geared to create more flexibility in terms of production planning.

As a result of these efforts, OSC indicates there has been a reduction in the amount of products having to be transported by air freight.

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
--	------------------	--	---	---	---	---

Recommendation: FWF encourages OSC to continue its root cause analysis efforts and document the remediation efforts that come out of it.

Comment: As mentioned earlier, OSC always has a discussion with factories about the past production run and works to see what can be done to improve the process.

In addition to this, OSC undertook a root cause analysis process for overtime. Where FWF audits indicated that overtime was taking place, OSC wrote a letter to the factory asking for a root cause analysis of this overtime. This included questions related to the approval of samples, the timing of fabric and accessories deliveries, and the actions of other clients. Based on the response it received, OSC made the decision to work with 4-5 production locations that were of strategic importance to them and where they had sufficient leverage to be able to make a difference. This process is ongoing and will continue in 2016.

In 2015, a verification audit indicated that there continued to be problems related to the approval of samples and the delivery of fabric from Japan. In addition to the steps mentioned above, OSC was able to show that it took additional measures to remediate the late approval of samples.

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
--	----------------------	--	--	---	---	---

Recommendation: FWF encourages OSC to continue its efforts to gain more insight into the costing of its products. Increased transparency in costing and productivity gives insight in the labour costs per product and 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. In 2015, OSC has started an open costing process for a number of its styles but this is not yet sufficient to be able to ensure that its costing process ensures the payment of at least legal minimum wages.

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
---	-----	--	---	---	---	----

Comment: In 2015, one audit indicated that workers were not receiving legal minimum wages. Based on the audit findings, OSC contacted the factory on multiple occasions to gain more insight into the wage levels and if they were above legal minimum wage levels. The factory indicated that the wages had been increased and that this was no longer an issue.

1.10 Evidence of late payments to suppliers by affiliate.	No	Late payments to suppliers can have a negative impact on factories and their ability to pay workers on time. Most garment workers have minimal savings, and even a brief delay in payments can cause serious problems.	Based on a complaint or audit report; review of factory and affiliate financial documents.	0	0	-1
---	----	--	--	---	---	----

1.11 Degree to which affiliate assesses root causes of wages lower than living wages with suppliers and takes steps towards the implementation of living wages.	Factory-level approach	Sustained progress towards living wages requires adjustments to affiliates' policies.	Documentation of policy assessments and/or concrete progress towards living wages.	4	8	0
---	------------------------	---	--	---	---	---

Recommendation: FWF encourages OSC to continue on its root cause analysis and remediation efforts related to wages. It is also encouraged to link its pricing reviews to current wage levels at the factories and discuss with the factory how there can be more room created for higher wages.

Comment: As labour costs are increasing in China, where most of OSC's production still takes place, factories are trying to improve automation so production is less labour-intensive and more efficient. OSC sees this trend also happening in historically less technical factories.

OSC has also taken steps to review pricing at an earlier stage in the design and production phase. When coming up (new) styles for future production, a range brief is put together. In this brief, the prices quoted by factories for the (new) styles are reviewed and the cause for a potential price increase is reviewed. OSC does not automatically look to reduce the labour costs, but also takes in consideration what the material and/or accessories costs are. In this way, they work to make a price-efficient product.

In addition to this, OSC started tracking wage levels at its key suppliers. This tracking includes wage levels both with and without overtime. These wage levels are also related to relevant living wage estimates as provided by the FWF Wage Ladder.

In its contact with factories and overtime as mentioned earlier, OSC also included questions related to the root causes of wages being lower than living wage levels. Questions included whether OSC's pricing, sampling or order size practices were a possible cause for wages being lower than living wage estimates.

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

PURCHASING PRACTICES

Possible Points: 40

Earned Points: 30

2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	83%	
% of own production in low risk production countries where FWF's Low Risk policy has been implemented	3%	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	93%	Minimums: 1 year: 40%; 2 years 60%; 3 years+: 90% Measured as a percentage of turnover.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.1 Specific staff person is designated to follow up on problems identified by monitoring system	Yes	Followup is a serious part of FWF membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	2	2	-2
2.2 Degree of progress towards resolution of existing Corrective Action Plans	Advanced	FWF considers efforts to resolve CAPs to be one of the most important things that affiliates can do towards improving working conditions.	Documentation of remediation and followup actions taken by affiliate.	8	8	-2

Recommendation: FWF encourages OSC to continue its in-depth remediation efforts, and continue its work on overtime and living wages.

Comment: OSC makes an in-depth effort to address all of the CAPs. In 2015, it was able to show that it followed up on a regular and structured basis on the progress that its suppliers had made on remediation. A remediation review is conducted every six months based on input from the OSC employees that have had contact with the suppliers during factory visits and via emails, conference calls, etc.

In between OSC visits to suppliers, OSC has developed a questionnaire for its QC staff to complete on their factory visits. This basic questionnaire checks whether the CoLP sheet is still posted and also contains basic questions related to the 8 FWF Labour Practices. OSC was able to show a number of completed questionnaires on its server on a factory level.

In addition to this and as mentioned earlier, OSC has undertaken a number of steps to work on remediation of the more difficult issues related to overtime and payment of living wages. This ranges from ensuring that workers received the right overtime premiums to taking steps to ensure a smooth production flow from design to sampling and production.

2.3 Percentage of production volume from suppliers that have been visited by the affiliate in the past financial year	81%	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
---	-----	---	---	---	---	---

Comment: In 2015, OSC visited the suppliers where 81% of its production took place.

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
--	-----	---	--	---	---	---

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: During its due diligence phase, OSC works to collect existing audit reports. They are not, however, assessed for quality or had the corrective action plans implemented on a systematic level.

2.5 Audit Report and Corrective Action Plan (CAP) findings are shared with factory. Improvement timelines are established in a timely manner	Yes	2 part indicator: FWF audit reports were shared and discussed with suppliers within two months of audit receipt AND a reasonable time frame was specified for resolving findings.	Corrective Action Plans, emails; findings of followup audits; brand representative present during audit exit meeting, etc.	2	2	-1
2.6 High risk issues specific to the affiliate's supply chain are identified and addressed by the monitoring system.	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

Recommendation: FWF encourages OSC to begin taking steps addressing Freedom of Association and democratically elected worker representatives for its factories in China.

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

As mentioned earlier, OSC undertook root cause analysis efforts related to overtime and living wages, as this was a common finding for the majority of its production in China.

Through a system of QC questionnaire checks, regular audits and systematic follow-up, most risks are mitigated as much as possible.

The issue of freedom of association, mostly related to its factories in China, while addressed during CAP remediation, has not (yet) been remediated in an in-depth manner.

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 changes of a factory having to conduct multiple Corrective Action Plans about the same issue with multiple customers.	Shared CAPs, evidence of cooperation with other customers.	2	2	-1

Comment: Wherever possible, OSC actively cooperates with other FWF brands in resolving corrective actions at shared suppliers. In 2015, it shared a number of audits with other FWF members and followed up on these audits cooperatively.

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)	100%	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
--	------	--	-----------------------------	---	---	---

Comment: OSC resells two external brands. Both have signed the external brand questionnaire and the production locations are known to OSC.

2.10 External brands resold by affiliates that are members of another credible initiative. (% of external sales volume)	0%	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
---	----	---	---	---	---	---

Recommendation: OSC is encouraged to book progress towards an external supplier base that is covered by either FWF or have another acceptable system in place for monitoring its supply chain.

MONITORING AND REMEDIATION

Possible Points: 35

Earned Points: 30

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	Yes	The Worker Information Sheet is a key first step in alerting workers to their rights.	Photos by company staff, audit reports, checklists from factory visits, etc.	2	2	0

Comment: OSC has a system in place to check that the Worker Information Sheet is posted. FWF was able to verify that these were posted, including the newly redesigned posters.

3.3 Percentage of FWF-audited factories where at least half of workers are aware of the FWF worker helpline.	37%	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: In 2015, 3 out of 8 audited factories were aware of the FWF worker helpline or had received a WEP training session.

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
--	------------------------	---	---	-----	---	----

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
--	--	--	--	-----	---	----

Comment: No complaints were received in 2015.

COMPLAINTS HANDLING

Possible Points: 7

Earned Points: 5

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
4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices.	Affiliate does not use agents	Agents have the potential to either support or disrupt CoLP implementation. It is the responsibility of affiliate to ensure agents actively support the implementation of the CoLP.	Correspondence with agents, trainings for agents, FWF audit findings.	N/A	2	-2
4.4 Factory participation in Workplace Education Programme (where WEP is offered; by production volume)	50%	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

Comment: In 2015, one new person responsible for FWF requirements joined OSC. He was trained on the work related to this, and also attended the affiliates training seminar in early 2016.

Comment: A little more than 50% of factories (according to production volume) located in countries where WEP was offered in 2015 participated in the WEP training program.

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
---	----	--	---	---	---	---

Recommendation: 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.

TRAINING AND CAPACITY BUILDING

Possible Points: 13

Earned Points: 9

5. INFORMATION MANAGEMENT

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
5.1 Level of effort to identify all production locations	Advanced	Any improvements to supply chains require affiliates to first know all of their production locations.	Supplier information provided by affiliate. Financial records of previous financial year. Documented efforts by affiliate to update supplier information from its monitoring activities.	6	6	-2

Recommendation: OSC should enter all relevant embroidery and printing factories into its database and ensure that the CoLP is posted.

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

5.2 A system exists to allow purchasing, CSR and other relevant staff to share information with each other about working conditions at suppliers	Yes	CSR, purchasing and other staff who interact with suppliers need to be able to share information in order to establish a coherent and effective strategy for improvements.	Internal information system; status CAPs, reports of meetings of purchasing/CSR; systematic way of storing information.	1	1	-1
--	-----	--	---	---	---	----

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

INFORMATION MANAGEMENT

Possible Points: 7

Earned Points: 7

6. TRANSPARENCY

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
6.1 Communication about FWF membership adheres to the FWF communications policy	Yes	FWF membership should be communicated in a clear and accurate manner. FWF guidelines are designed to prevent misleading claims.	Logo is placed on website; other communications in line with policy. Affiliates may lose points if there is evidence that they did not comply with the communications policy.	1	1	-2

Comment: All relevant OSC brands contain information related to FWF and adhere 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
--	----	---	---	---	---	---

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

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

Comment: OSC has submitted the Social Report for 2015 and it has been published on the 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: FWF is a regular item of discussion during management meetings, and progress on audits and Brand Performance Check scores is reported on.

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
--	---	---	--	-----	---	----

EVALUATION

Possible Points: 2

Earned Points: 2

RECOMMENDATIONS TO FWF

OSC feels that audit reports should be more condensed and easier to synthesize. FWF could do more to activate consumer interest and information about social compliance and FWF, especially in the UK.

SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	30	40
Monitoring and Remediation	30	35
Complaints Handling	5	7
Training and Capacity Building	9	13
Information Management	7	7
Transparency	3	4
Evaluation	2	2
Totals:	86	108

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

80

PERFORMANCE BENCHMARKING CATEGORY

Leader

BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

08-06-2016

Conducted by:

Kees Gootjes, Andrea Spithoff

Interviews with:

Brian Connolly, Group Sourcing Director

Duncan Machin, Marketing Manager Mountain Equipment

Ian Christian, Brand Director Sprayway

Kevin Offer, CSR Manager

Sarah Forte, Buying Director Mountain Equipment

Steve Rothwell, Ronhill & Hilly Brand Director

Thomas Coxon, Sprayway Marketing Manager

Audit Summary:

Publication of the audit summary section previously included in Brand Performance Checks has been suspended while Fair Wear Foundation develops a new information system to manage and summarize the data.