



BRAND PERFORMANCE CHECK

LaDress B.V.

PUBLICATION DATE: NOVEMBER 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

LaDress B.V.

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

AFFILIATE INFORMATION	
Headquarters:	Amsterdam, Netherlands
Member since:	01-01-2014
Product types:	Fashion
Production in countries where FWF is active:	Romania
Production in other countries:	The Netherlands, Poland, 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	64%
Benchmarking score	44
Category	Good

Summary:

LaDress is in process of implementing FWF's management system requirements. The company has stable and long term relationships with their suppliers; particularly with their main supplier in Romania, where over 60% of LaDress' 2015 purchasing volume is produced and where the company has substantial leverage. This partnership supports effective implementation of the Code of Labour Practices.

With an audit conducted at the Romanian supplier in 2015, LaDress has monitored 64% of their 2015 volume which meets the threshold that is required for second year members. The remaining 36% of their volume comes from suppliers in low risk areas. LaDress has not been able to demonstrate the Worker Information Sheet has been posted at all suppliers and all signed questionnaires with the Code of Labour Practices have been returned.

LaDress has invested the second year of FWF membership in following up on the Corrective Action Plan after the audit at the Romanian supplier. It has remediated several health and safety findings and has been working on improving the social compliance system.

LaDress can take next steps in gaining more insight into wage levels and increasing awareness among workers and management of labour rights and social dialogue. Moreover, monitoring and assessing progress in working conditions can be more systematically integrated in the company's work processes.

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	83%	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

Recommendation: Seeing that LaDress is planning to set up a written contractual partnership agreement with their main supplier in Romania, it is advised to make specific commitment towards implementing the Code of Labour Practices part of this agreement.

Comment: LaDress maintains a strong partnership with its main supplier in Romania that produces over 60% of the production capacity for LaDress. The partnership started from the moment the factory opened business in Romania and continued to a mutual depending partnership. This results in a high level of flexibility and gives LaDress a strong position to request improvements in working conditions. LaDress is a fast growing brand and aims to expand with existing suppliers who have the opportunity to grow in conjunction with LaDress.

1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years	19%	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.	1	4	0
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Comment: LaDress has a stable supplier base and values long term and trust worthy relationships. The company started production in the Netherlands and moved the majority of their production to Romania in 2011 where a Dutch family started a production location.

1.3 All new suppliers are required to sign and return the Code of Labour Practices before first orders are placed.	No	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.	0	2	0
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Requirement: La Dress needs to ensure that new suppliers sign and return the questionnaire before first orders are placed.

Comment: Not all signed questionnaires were documented. LaDress has been in process of collecting the correct data for their suppliers located in the Netherlands and other low-risk areas.

1.4 Company conducts human rights due diligence at all new suppliers before placing orders.	No	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.	0	4	0
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Recommendation: It is suggested to further develop a systematic approach towards assessing possible human rights risks. A written sourcing strategy that describes the process for evaluating working conditions of new suppliers and how this feeds into the decision making process will support an integrated process and ensures risks can be mitigated. Outcomes of visits and communication with new suppliers should be documented in order to make informed sourcing decisions that include working conditions and the willingness of suppliers to cooperate on improvements as an important criteria.

FWF country and stakeholder information can be used for investigating potential human rights risks.

Comment: LaDress has deliberately chosen to conduct part of its business in areas with considerably lower risks of human rights abuses and with better controllable monitoring opportunities such as the Netherlands and Portugal. Last financial year LaDress worked with 5 factories of which 3 in the Netherlands. In 2015, LaDress initiated a process for selecting new factories in Bali for a specific type of garment and skills that was required for a new range in their collection. Several production locations were introduced by an agent, which were small workshops offering the requested craftsmanship. The locations were visited by the owner who conducted an initial health and safety assessment and discussed the Code of Labour Practices. LaDress does not yet have a systematic approach towards assessing working conditions for new suppliers that is including in their sourcing strategy and decision making process.

1.5 Supplier compliance with Code of Labour Practices is evaluated in a systematic manner.	Yes	A systemic approach is required to integrate social compliance into normal business processes, and supports good decisionmaking.	Documentation of systemic approach: rating systems, checklists, databases, etc.	1	2	0
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Recommendation: With the audit conducted by FWF at the supplier in Romania and potential new factories that will be part of the supplier base in coming years, FWF suggest to set up a formal evaluation system that includes progress on social compliance and can include outcomes of audits, trainings and/or complaints.

Comment: With only one factory located outside of low risk areas, it was not yet necessary to set up an evaluation system for the entire supplier base. Performance was measured on a day to day business in close communication with the supplier.

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: LaDress' forecasting system is based on weekly sales overview. A preferred delivery date is set in cooperation with the factory management and the production team is in constant communication about the delivery. LaDress items are not seasonable, but produced in a constant flow, all year round, 2 dresses a week. This makes it easier for the factory to schedule and manage the number of workers. Quantity and styles do not change after the final order is placed. LaDress is flexible to move around orders based on priority. Together with the main supplier in Romania, LaDress knows the production capacity and the time it takes to make the dresses. LaDress can split orders and can postpone the delivery time in case a deadline is not met. Or the delivery time is mentioned online so that customers know when to expect the purchased item. 'Made to order' items ensure the item is being produced once the order comes in.

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: The audit conducted by the FWF team in Romania did not conclude excessive working hours.

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: LaDress is recommended to assess their prices in relation to the share that is paid to workers. 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: LaDress is aware of the minimum wage levels in Romania. The company can make an estimate of the FOB price divided by the number of workers, but does not know the exact labour costs in relation to their own pricing policy.

1.9 Affiliate actively responds if suppliers fail to pay legal minimum wages.	No data available	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.	N/A	2	-2
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Recommendation: FWF encourages LaDress to continue the dialogue with their Romanian supplier to support transparent wage records. This is required to verify the payment of minimum wage and forms the basis for defining further steps for LaDress. FWF suggests LaDress to conduct a wage assessment in 2017.

Comment: The audit in Romania could not verify wage levels as the factory was not transparent with the wage records.

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: LaDress is expected to take an active role in discussing living wages with its supplier in Romania and possible new production locations outside of low risk areas. The FWF wage ladder can be used as a tool to implement living wages. Most relevant wage estimates, such as local minimum 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; the wage benchmarks are also included in FWF's country study. It demonstrates the gaps between workers' wages at a factory and living wages defined by major stakeholders. The wage ladder can be used to document, monitor, negotiate and evaluate the improvements at its suppliers.

Comment: LaDress has not yet discussed living wages with their supplier in Romania given that wage data is not yet available.

The remaining 2015 volume is produced in factories located in low risk areas where wages are covered by a Collective Bargaining Agreement negotiated by local institutes. Local institutions are in place to provide access to remedy and could support workers to negotiate their wages.

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

PURCHASING PRACTICES

Possible Points: 32

Earned Points: 14

2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	64%	
% of own production in low risk production countries where FWF's Low Risk policy has been implemented	0%	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	64%	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 LaDress 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.
- providing financial support to the supplier for implementing improvements.

FWF advises to use the expertise of FWF and the local audit team for guidance on effective grievance systems, discrimination policies, and labour contract issues. LaDress can improve its system for documenting evidence and verifying measures taken by the factory. LaDress can investigate whether its commitment to ensure stable orders can contribute to reducing temporary contract work. The high leverage/influence can be used to work on the correct stipulations in labour contracts that meet the relevant skill level of all workers.

Comment: The findings from the FWF audit conducted at the Romanian supplier in 2015 were discussed during several visits. During meetings the status of the Corrective Action Plan was discussed with factory management. Several efforts to remediate findings took place, particularly in the area of health & safety, such as conducting a fire & building safety training. Moreover, regular staff meetings between employees and management took place, and a discrimination policy has been set up. Other issues such as the quality of the Collective Bargaining Agreement, wage records and grievance system including the FWF hotline remain pending.

2.3 Percentage of production volume from suppliers that have been visited by the affiliate in the past financial year	83%	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: It is recommended to structurally document outcomes of the visits for production sites (including subcontractors and production locations in low-risk countries). The reports of the visits can provide information for colleagues on the discussions of working conditions and ensures the same messages is given to suppliers from different LaDress staff. Regular visits provide the opportunities to discuss problems and corrective actions in the time period between formal audits.

2.4 Existing audit reports from other sources are collected.	No existing reports/all audits by FWF or FWF affiliate	Existing reports form a basis for understanding the issues and strengths of a supplier, and reduces duplicative work.	Audit reports are on file; evidence of followup on prior CAPs. Reports of quality assessments.	N/A	3	0
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.	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

Recommendation: In order to reach the advanced scoring, LaDress will have to demonstrate realised improvements after the recent audit at the Romanian supplier and have taken additional efforts regarding wage compliance in Romania. Moreover, LaDress can increase effective worker representation and awareness of labour rights, possibly through the Workplace Education Programme. In addition, LaDress is advised to send the homeworkers questionnaire to the new production location in Bali.

Comment: LaDress has deliberately chosen to conduct most part of its business in areas with considerably lower risks of human rights abuses. Production in 2015 was solely done in European countries to emphasize the importance of good quality and working conditions. In addition, shorter distances within Europe allow for easier supervision. The supplier in Romanian has started production in close cooperation with LaDress. Other sourcing countries are Poland, Portugal and the Netherlands.

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	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

2.8 Monitoring requirements are fulfilled for production in low-risk countries	No	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.	0	2	0
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Requirement: Monitoring requirements need to be fulfilled for production in low-risk countries in order for it to be counted towards the monitoring threshold. All production sites in low-risk countries must:

- Be visited annually by Member company representatives;
- Be informed of FWF membership and return the completed CoLP questionnaire before production orders are placed;
- Be aware of specific risks identified by FWF;
- Have the FWF Worker Information Sheet posted in local languages.

Recommendation: The risk assessment for Portugal can be a valuable resource for LaDress to gain more insight into possible labour rights risks in Portugal.

Comment: LaDress was not able to demonstrate the Worker Information Sheet was posted and not all questionnaires of low risk factories were collected.

2.9 External brands resold by the affiliate who have completed and returned the external brand questionnaire. (% of external sales volume)	No external brands resold	FWF believes it is important for affiliates that have a retail/wholesale arm to at least know if the brands they resell are members of FWF or a similar organisation, and in which countries those brands produce goods.	Questionnaires are on file.	N/A	3	0
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2.10 External brands resold by affiliates that are members of another credible initiative. (% of external sales volume)	No external brands resold	FWF believes affiliates who resell products should be rewarded for choosing to stock external brands who also take their supply chain responsibilities seriously.	External production data in FWF's information management system. Documentation of sales volumes of products made by FWF or FLA members.	N/A	3	0
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MONITORING AND REMEDIATION

Possible Points: 24

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: LaDress 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. The information sheet is the first step towards awareness raising about the existence and functioning of FWFs worker hotline. Aside from visits, pictures can be taken or sent to demonstrate the Worker Information Sheet is posted.

Recommendation: In case LaDress feels this would support their efforts, FWF staff in Amsterdam or Romania can explain to the factory owner in Romania directly why it is important to have the Worker Information Sheet posted in his factory.

Comment: Audit in Romania showed the Code of Labour Practices was not posted. LaDress has taken steps to discuss and convince the supplier to do so, however this takes time and is not yet resolved. LaDress continues to put effort into this. For other factories LaDress has not yet been able to demonstrate evidence the Worker Information Sheet is posted.

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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Recommendation: La Dress 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, member companies can use the worker information cards available for download on FWF's website.

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

Recommendation: It is advised to develop a standard procedure for all new employees to get familiar with FWF membership. FWF has material available that can be used to inform (sales) staff.

4.2 Ongoing training in support of FWF requirements is provided to staff in direct contact with suppliers.	Yes	Sourcing, purchasing and CSR staff at a minimum should possess the knowledge necessary to implement FWF requirements and advocate for change within their organisations.	FWF Seminars or equivalent trainings provided; presentations, curricula, etc.	2	2	0
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Recommendation: A training session on labour standards can be held for (purchasing) staff. FWF can support or facilitate in providing training. 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: A FWF wellmade training was given to LaDress staff in 2015.

4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices.	Yes + actively support COLP	Agents have the potential to either support or disrupt CoLP implementation. It is the responsibility of affiliate to ensure agents actively support the implementation of the CoLP.	Correspondence with agents, trainings for agents, FWF audit findings.	2	2	-2
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Comment: Agents have been informed of the membership with the Fair Wear Foundation. The agent in Bali had taken an active role in assessing working conditions and collecting the necessary information.

4.4 Factory participation in Workplace Education Programme (where WEP is offered; by production volume)	No production in WEP areas	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.	N/A	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: FWF offers the Workplace Education Programme in Romania since 2015. However, since the factory has just been audited in 2015, an non applicable is applied here in order to give LaDress more time for organising the training in 2016 or 2017.

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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Comment: All production locations are either in low risk areas or in areas where the Workplace Education Programme is offered.

TRAINING AND CAPACITY BUILDING

Possible Points: 5

Earned Points: 5

5. INFORMATION MANAGEMENT

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
5.1 Level of effort to identify all production locations	Intermediate	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.	3	6	-2

Recommendation: LaDress is recommended advised to further complete the supplier list, including all subcontractors for all product types that are produced in addition to dresses, for instance beach wear, jackets and accessories such as belts. Part of the approach can be:

- 1) automatically include information from audit reports and complaints
- 2) Business relationships with agents include transparency of production locations.
- 3) 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: LaDress uses the FWF questionnaire to collect information on subcontractors and update the supplier list, among others in Poland. The factory in Romania is visited often. One factory address in low risk country is not the correct address which LaDress is investigating.

5.2 A system exists to allow purchasing, CSR and other relevant staff to share information with each other about working conditions at suppliers	No	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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Requirement: 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.

Recommendation: FWF advises the CSR manager to systematically inform colleagues how to check labour conditions before they visit suppliers. The CSR manager should make relevant staff aware of the available tools FWF offers, such as the Health and Safety guidelines, monitoring CAP documents, access to FWF's online information system. Staff is recommended to share reports from factory visits that include a status update of implementing the CoLP. This ensures that the factories receive the same message from LaDress, whether it comes from the CSR manager, the purchasing team or owner.

Comment: Although FWF membership and requirements are often discussed in team meetings, there is no system yet to document and share status of working conditions between staff who interact with suppliers.

INFORMATION MANAGEMENT

Possible Points: 7

Earned Points: 2

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

Recommendation: The description of FWF on the website needs to include a link to the FWF website.

Comment: FWF membership is described in correct wording on the website of LaDress.

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 LaDress 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	Complete report submitted to FWF	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.	1	2	-2
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Requirement: FWF approach requires transparency on member's work towards social standards. The social report needs to be submitted to FWF and published on the member's website.

TRANSPARENCY

Possible Points: 4

Earned Points: 2

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

Recommendation: FWF advises to discuss the outcomes of this performance check with the production staff, the CSR manager and the management team. It can be used to prioritize and set goals for next year.

Comment: All decisions related to FWF membership are made in cooperation with the owner and development team. It is evaluated if the outcomes and progress are still corroborating with the LaDress philosophy and strategy.

7.2 Changes from previous Brand Performance Check implemented by affiliate	0%	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.	-2	4	-2
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Comment: The three requirements from last performance check are still ongoing: LaDress continues to gain more insight into wage levels at its main supplier. The company is in process of ensuring the Worker Information Sheet is posted and will publish its social report online.

EVALUATION

Possible Points: 6

Earned Points: 0

RECOMMENDATIONS TO FWF

LaDress mentioned tools, material and documentation is sometimes not easily accessible on the FWF website.

SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	14	32
Monitoring and Remediation	15	24
Complaints Handling	-1	7
Training and Capacity Building	5	5
Information Management	2	7
Transparency	2	4
Evaluation	0	6
Totals:	37	85

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

44

PERFORMANCE BENCHMARKING CATEGORY

Good

BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

03-11-2016

Conducted by:

Annabel Meurs

Interviews with:

Simone van Trojen (founder and CEO)

Nynke Eggen (CSR Manager)

Nancy Ros (production coordinator)

Pieter de Ridder (CFO)

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.