



## BRAND PERFORMANCE CHECK

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King Louie

PUBLICATION DATE: NOVEMBER 2016

this report covers the evaluation period 01-06-2015 to 31-05-2016

## 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](http://www.fairwear.org). The online [Brand Performance Check Guide](#) provides more information about the indicators.

## BRAND PERFORMANCE CHECK OVERVIEW

King Louie

Evaluation Period: 01-06-2015 to 31-05-2016

AFFILIATE INFORMATION	
Headquarters:	Amsterdam, Netherlands
Member since:	01-10-2015
Product types:	Fashion
Production in countries where FWF is active:	China, India, Turkey
Production in other countries:	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	42%
Benchmarking score	47
Category	Good: 47

## Summary:

King Louie meets most of FWF's management system requirements. With a monitoring percentage of 43 and a benchmark score of 47, it is placed in the Good category for members in their first year of FWF membership. King Louie's first year of membership started four months after the start of their financial year, which means that FWF's monitoring requirements were met within a time period of eight months.

In its first year of FWF membership, King Louie concentrated on informing all of its suppliers that it joined FWF and collecting a signed questionnaire. King Louie worked hard on identifying all production locations, including subcontractors, and focused on stabilising the supplier base and create a more fixed set of production locations. In addition to this, several audits were conducted by FWF, which were followed up by King Louie on in a structural manner.

FWF encourages King Louie to better structure and formalise its due diligence process related to selecting new suppliers; the level of working conditions at its production locations should be systematically integrated in its sourcing decisions. In addition, FWF recommends King Louie to improve its evaluation of suppliers' social compliance.

King Louie is expected to take an active role in discussing living wages with its suppliers in production countries to ensure factory-level improvements.

## 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	63%	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

**Recommendation:** FWF recommends King Louie to maintain stable business relationships with suppliers. Long term relationships support most aspects of the Code of Labour Practices, and give factories a reason to invest in improving working conditions.

**Comment:** A total of 63% of King Louie's supplier volume is bought from factories where the company has substantial leverage (at least 10% of the factory production capacity). The company's goal is to further deepen the cooperation with selected key suppliers (including selected subcontractors) over the years.

1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years	62%	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:** King Louie values long term relationships based on close cooperation with its suppliers. 62% of their 2015/2016 purchasing volume comes from factories they have worked with for more than 5 years.

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:** King Louie needs to ensure that new suppliers sign and return the questionnaire before first orders are placed.

**Comment:** New suppliers are requested to complete the FWF questionnaire and CoLP before production starts. A few new suppliers did not sign and send back the Code of Labour Practices before first orders were placed, but were received afterwards.

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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**Requirement:** A formal process should exist to evaluate the risks of labour violations in the production areas the affiliate is operating. The documentation needs to incorporate information related to risk assessments on a country or factory level.

This evaluation should influence the decision on whether to place orders, how to prevent and mitigate risks, and what remediation steps may be necessary.

**Comment:** Currently, new suppliers are sourced in various ways: through fairs, own network, via agents or other suppliers. During the first contact, King Louie shares its sample manual with the potential supplier. This manual contains general CSR information. Factory visits are only done by King Louie’s agents, prior to placing orders. FWF information plus questionnaire is sent after the first orders are placed. Even though general risk assessment is done prior to production, King Louie does not yet properly conduct and document a due diligence process for selecting new suppliers.

King Louie works with several agents, who could play an important role in the process of due diligence, however this requires clear guidance and monitoring from King Louie.

In the future, King Louie plans to more systematically conduct human rights due diligence, to prevent and mitigate risks as much as possible.

1.5 Supplier compliance with Code of Labour Practices is evaluated in a systematic manner.	No	A systemic approach is required to integrate social compliance into normal business processes, and supports good decisionmaking.	Documentation of systemic approach: rating systems, checklists, databases, etc.	0	2	0
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**Requirement:** A systematic approach is required to integrate social compliance into normal business processes, and supports good decision-making. The approach needs to ensure that the member consistently evaluates the entire supplier base and includes information into decision-making procedures.

**Comment:** King Louie works with several agents that play an important role in the production countries. These agents monitor supplier compliance and report back to King Louie, however there is no official policy yet in place. Currently, communication, CSR willingness and quality are assessed on an ad hoc basis and is not yet linked to future production decision-making procedures.

In the near future, King Louie wants to create a contract, in which suppliers and factories state to cooperate with King Louie on their path to improve labour conditions according to the standards set by FWF. In this way, King Louie hopes to be able to show sourcing, production and design staff what the social compliance levels are of the potential suppliers.

1.6 The affiliate's production planning systems support reasonable working hours.	General or ad-hoc system.	Affiliate production planning systems can have a significant impact on the levels of excessive overtime at factories.	Documentation of robust planning systems.	2	4	0
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**Comment:** King Louie works with four delivery blocks per year for each supplier. This way of working is especially interesting for King Louie's small and medium suppliers in Turkey, as it gives the suppliers more space to plan ahead and move around/switch orders in case needed.

King Louie indicated that the buying process has improved a lot through the implementation of a new ERP system. Furthermore, the company's two 'classics' collections are now produced throughout the year, to fill the low seasons.

The increased stability in King Louie's supplier base has also a positive effect on this, as orders can be placed much more aligned with production capacity per supplier.



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.	3	6	0
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**Recommendation:** King Louie could discuss the causes of excessive overtime with factory management and provide support to manage overtime. If necessary, King Louie could hire local experts to analyse root cause of excessive overtime in cooperation with the supplier. FWF could recommend qualified persons upon request.

**Comment:** Excessive overtime was found during two audits at Turkish suppliers, conducted in this financial year. King Louie is in close contact with one of these two main suppliers in Turkey to discuss root causes of excessive overtime. In the next financial year, discussions will be started with the other main supplier. Turkish suppliers claim that material delays are the main cause. By starting to work with delivery blocks instead of exact dates (one block is one month), King Louie is able to provide more flexibility to the supplier to move delivery dates around or even switch orders between blocks.

In this discussion, one of the main goals is finding out when subcontractors are used. King Louie is closely looking at what they can do to mitigate the causes of excessive overtime in the future.

Close communication with their suppliers regarding production planning is one of the crucial elements in this process.

1.8 Affiliate's pricing policy allows for payment of at least the legal minimum wages in production countries.	Country-level policy	The first step towards ensuring the payment of minimum wages - and towards implementation of living wages - is to know the labour costs of garments.	Formal systems to calculate labour costs on per-product or country/city level.	2	4	0
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**Recommendation:** At a minimum, King Louie is recommended to investigate wage levels in production countries, starting by making use of FWF's Wage Ladder and country studies. As an advanced step, increased transparency in costing and productivity gives insight in the labour costs per product. This forms the basis for ensuring enough is paid to cover at least minimum wage and for making steps towards living wages.

**Comment:** When it comes to pricing, the process is set by determining the commercial price and then working backwards with the margins. Cost of material is calculated in advance.

A target production price range is set based on this information and general level of production costs and minimum wages per country are known.

As the majority of suppliers are long-term partners, King Louie indicates that the prices are not negotiated down to the lowest possible price as that would not help in the long term.

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 causes of wages lower than living wages with suppliers and takes steps towards the implementation of living wages.	No efforts shown.	Sustained progress towards living wages requires adjustments to affiliates' policies.	Documentation of policy assessments and/or concrete progress towards living wages.	0	8	0

**Requirement:** King Louie is expected to take an active role in discussing living wages with its suppliers in high-risk production countries. 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. It demonstrates the gaps between workers' wages at a factory and living wages demanded by major stakeholders. The wage ladder can be used to document, monitor, negotiate and evaluate the improvements at its suppliers.

**Comment:** In the last financial year, King Louie's main focus has been on gaining insight locations and stabilising supplier base. There has not yet been active discussion on living wage in high-risk production countries.

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: 15

## 2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	42%	
% 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	42%	Minimums: 1 year: 40%; 2 years 60%; 3 years+: 90% Measured as a percentage of turnover.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.1 Specific staff person is designated to follow up on problems identified by monitoring system	Yes	Followup is a serious part of FWF membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	2	2	-2

**Comment:** King Louie has designated a specific employee to follow up on problems identified by the monitoring system. This person is working together with employees from both production and buying department.

2.2 Degree of progress towards resolution of existing Corrective Action Plans	Intermediate	FWF considers efforts to resolve CAPs to be one of the most important things that affiliates can do towards improving working conditions.	Documentation of remediation and followup actions taken by affiliate.	4	8	-2
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**Recommendation:** FWF encourages King Louie to work towards addressing findings related to more challenging issues related to overtime, wages and freedom of association. This could start with a root cause analysis and move towards more in-depth follow-up.

**Comment:** The Corrective Action Plans are immediately shared and discussed with suppliers. The content is discussed either during visits to King Louie's head office by the agent/supplier or through Skype calls. King Louie uses the FWF CAP format to keep track of resolutions. In the communication with its suppliers King Louie prioritises the most critical issues.

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

**Comment:** King Louie did not visit production location in the past financial year. However, the agents did regularly visit the factories. Several main suppliers and agents visit King Louie's head office on a frequent basis.

2.4 Existing audit reports from other sources are collected.	Yes and quality assessed	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.	2	3	0
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**Comment:** King Louie did collect external audit reports and assessed the quality of the audit with FWF's audit quality assessment tool. Follow-up is planned for the next financial year.

2.5 Audit Report and Corrective Action Plan (CAP) findings are shared with factory. Improvement timelines are established in a timely manner	Yes	2 part indicator: FWF audit reports were shared and discussed with suppliers within two months of audit receipt AND a reasonable time frame was specified for resolving findings.	Corrective Action Plans, emails; findings of followup audits; brand representative present during audit exit meeting, etc.	2	2	-1
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**Comment:** Audit reports and CAPs are shared with factories in a timely manner and the CAP template is used for communication between brand and factory.

2.6 High risk issues specific to the affiliate's supply chain are identified and addressed by the monitoring system.	Intermediate Capacity	Different countries and products have different risks associated with them; monitoring systems should be adapted to allow appropriate human rights due diligence for the specific risks in each affiliates' supply chain.	Documentation may take many forms; additional research, specific FWF project participation; extra monitoring activities, extra mitigation activities, etc.	3	6	0
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**Recommendation:** FWF recommends King Louie to further look into specific risk related to the production in Turkey. In addition, FWF recommends King Louie to organise WEP trainings in China to specifically address issues related to freedom of association

**Comment:** Through its follow-up process, King Louie has a general view of high risk issues on a country level for its existing suppliers. King Louie uses information provided by FWF on high-risk issues in their supply chain, such as the possible presence of illegal Syrian refugees in Turkish factories, to inform their agents and suppliers.

King Louie does not (yet) consider social compliance risks on a thematic level related to issues such as overtime, wage levels and freedom of association.

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
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2.6b High risk issues specific to Myanmar are identified and addressed by the monitoring system and remediation activities.	Not sourcing in Myanmar	Myanmar is still in the process of establishing the legal and civil society infrastructure needed to ensure compliance with labour rights. Extra care must be taken when doing business in Myanmar.	Shared CAPs, Wage Ladders per factory.	N/A	3	0
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2.7 Affiliate cooperates with other customers in resolving corrective actions at shared suppliers	Information sharing	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.	1	2	-1
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**Recommendation:** Cooperation among customers increases leverage, the chances of successful outcomes and long term improvements. A first step can be identifying other clients and their commitment to improving working conditions.

**Comment:** King Louie is open to cooperating with other customers in resolving corrective actions at shared suppliers. In its past financial year, it had some initial contact with other customers at shared suppliers. This will be further explored in the next financial year.

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 frequently by affiliate 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.

**Comment:** King Louie was unable to show that the monitoring requirements for production in low-risk countries were fulfilled on a systematic basis, as it was not able to show that visits were done to factories in low-risk countries.

2.9 External brands resold by the affiliate who have completed and returned the external brand questionnaire. (% of external sales volume)	0%	FWF believes it is important for affiliates that have a retail/wholesale arm to at least know if the brands they resell are members of FWF or a similar organisation, and in which countries those brands produce goods.	Questionnaires are on file.	0	3	0
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**Requirement:** King Louie should send out and receive a completed questionnaire from external brands resold by the company.

**Comment:** King Louie sells a small percentage of external brands in their own two shops. The questionnaire for external brands was not yet sent, as the primary focus for King Louie in their first year of FWF membership has been on own production.

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
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Requirement: King Louie has to ensure progress towards an external supplier base that is covered by either FWF or have another acceptable system in place for monitoring its supply chain.

Comment: None of the external brands resold by King Louie are member of another credible initiative (yet).

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## MONITORING AND REMEDIATION

Possible Points: 35

Earned Points: 14

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### 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

Comment: A specific person is designated to address worker complaints, namely the Head of Design, Production and Buying in close cooperation with the person responsible for CSR in general.

3.2 System exists to check that the Worker Information Sheet is posted in factories	Yes	The Worker Information Sheet is a key first step in alerting workers to their rights.	Photos by company staff, audit reports, checklists from factory visits, etc.	2	2	0
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Comment: Suppliers are asked to share photographic evidence of the posted worker information sheets. In addition, agents visiting factories also check whether the worker information sheet is posted in factories. King Louie uses a clear overview to keep track of the status.

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
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**Recommendation:** King Louie 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, King Louie can use the worker information cards available for download on FWF's website.

**Comment:** In one-third of the audits, conducted in the last financial year, it was found that at least half of the workers are aware of the FWF worker helpline.

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: 5

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## 4. TRAINING AND CAPACITY BUILDING

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.1 All staff is made aware of FWF membership requirements	Yes	Preventing and remediating problems often requires the involvement of many different departments; making all staff aware of FWF membership requirements helps to support cross-departmental collaboration when needed.	Emails, trainings, presentation, newsletters, etc.	1	1	-1

Comment: After the start of FWF membership, all employees were informed about the way FWF works. Sales staff is specifically trained on FWF's communication guidelines.

4.2 Ongoing training in support of FWF requirements is provided to staff in direct contact with suppliers.	Yes	Sourcing, purchasing and CSR staff at a minimum should possess the knowledge necessary to implement FWF requirements and advocate for change within their organisations.	FWF Seminars or equivalent trainings provided; presentations, curricula, etc.	2	2	0
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Comment: Production, sourcing/design and buying staff is working very closely together, During weekly meetings between these three departments, audit results and follow-up is shared whenever needed. Furthermore, monthly meetings take place between the CSR person and management to share and discuss steps.

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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Recommendation: FWF encourages King Louie to ensure that agents actively support the implementation of FWF's CoLP.

**Comment:** King Louie works with a number of agents. These agents were all informed of FWF membership, and took steps to ensure access to factory level information. Most of the agents have not yet taken an active role to support implementation of the FWF Code of Labour Practices, but this will be taken up in the next financial year.

If agents are not willing to cooperate with the implementation of FWF membership, King Louie will eventually stop working with them.

4.4 Factory participation in Workplace Education Programme (where WEP is offered; by production volume)	0%	Lack of knowledge and skills on best practices related to labour standards is a common issue in factories. Good quality training of workers and managers is a key step towards sustainable improvements.	Documentation of relevant trainings; participation in Workplace Education Programme.	0	6	0
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**Requirement:** Manufacturers and their workers should be systematically informed about FWF and the implementation of the Code of Labour Practices. All factory management and workers should be informed and aware about the relevant labour standards and grievance mechanisms.

**Comment:** In King Louie's first year of FWF membership, the focus was on gaining insight into working conditions at factory level, mainly through audits. Next year, WEP trainings will be organised at the main suppliers.

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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## TRAINING AND CAPACITY BUILDING

Possible Points: 11

Earned Points: 4

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## 5. INFORMATION MANAGEMENT

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

**Recommendation:** FWF recommends King Louie to require agents to inform the company about the exact production location before orders start.

**Comment:** King Louie frequently checks with its agents whether all known production locations are still up to date. The information coming from questionnaires is used to update supplier data, including subcontractors. Once new (sub)contractors are found, the questionnaire is immediately sent and where relevant agents are actively approached to collect the necessary information. King Louie was able to show FWF that no information was missing.

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:** Both the Production department and Design&Sourcing department have access to information about working conditions at suppliers and are briefed about the improvement progress regularly in team meetings.



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## INFORMATION MANAGEMENT

Possible Points: 7

Earned Points: 7

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## 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
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
<p>Comment: King Louie did not yet publish audit reports or supplier lists. The company plans to publish the first Brand Performance Check on their website in the next financial year.</p>						
6.3 Social Report is submitted to FWF and is published on affiliate's website	Published on affiliate's website	The Social Report is an important tool for affiliates to transparently share their efforts with stakeholders.	Report adheres to FWF guidelines for Social Report content.	2	2	-2

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## TRANSPARENCY

Possible Points: 4

Earned Points: 3

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## 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 and an update are part of the agenda of the monthly meeting between management staff and CSR.

7.2 Changes from previous Brand Performance Check implemented by affiliate	No requirements were included in previous Check	In each Brand Performance Check report, FWF may include requirements for changes to management practices. Progress on achieving these requirements is an important part of FWF membership and its process approach.	Affiliate should show documentation related to the specific requirements made in the previous Brand Performance Check.	N/A	4	-2
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## EVALUATION

Possible Points: 2

Earned Points: 2

## RECOMMENDATIONS TO FWF

King Louie would appreciate FWF to offer more opportunities for member brands to meet and exchange information and best practices. Faster delivery of (audit) reports would be appreciated and a better guidance towards the actual audits, to be able to prepare the supplier as best as possible.

## SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	15	40
Monitoring and Remediation	14	35
Complaints Handling	5	7
Training and Capacity Building	4	11
Information Management	7	7
Transparency	3	4
Evaluation	2	2
Totals:	50	106

### BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

47

### PERFORMANCE BENCHMARKING CATEGORY

Good: 47

## BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

27-10-2016

Conducted by:

Hendrine Stelwagen

Interviews with:

Laura Tol - CSR

Jeroen Dijkema - Sales Director

Gael Brutin - Head of Design, Production and Buying

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.