

BRAND PERFORMANCE CHECK

Van Puijenbroek Textiel

PUBLICATION DATE: DECEMBER 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

Van Puijenbroek Textiel

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

| AFFILIATE INFORMATION | |
|--|--|
| Headquarters: | Goirle, Netherlands |
| Member since: | 01-02-2004 |
| Product types: | Workwear |
| Production in countries where FWF is active: | The former Yugoslav Republic of Macedonia, Tunisia |
| Production in other countries: | People's Democratic Republic of Laos |
| 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 | 64 |
| Category | Good |

Summary:

Van Puijenbroek meets most of FWF's management system requirements. With a monitoring percentage of 92% it meets the required threshold of 90% (required after more than three years of FWF membership).

In its 150th year of existence, Van Puijenbroek had a stable year due to a recovering market in the second half of the year. At the start of the year, order entry was lower than before, but Van Puijenbroek ensured that factories kept producing and workers had sufficient work. Products were kept in stock and used to fulfill the demand of the recovering market later in the year.

Van Puijenbroek has a stable supplier base of five main suppliers in Macedonia and Tunisia, where satellite production facilities support its main production. At its main suppliers, Van Puijenbroek should be commended for the fact that it has put a lot of effort in improving and monitoring working conditions. They know the locations very well and visit them frequently. The company has also worked on improving its monitoring percentage, bringing it up to above 90%. Making steps on wages in bringing them to a living wage level as one of the more complex issues remains as area for the coming period.

Van Puijenbroek has a lower benchmark score compared to last year due to the fact that on-garment communication was found and it had not followed up fully on last years' requirement to ensure and show that all factories had a FWF Code of Labour Practice posted including the suppliers with which it works incidentally.

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 | 97% | Affiliates with less than 10% of a factories' production capacity generally have limited influence on factory managers to make changes. | Supplier information provided by affiliate. | 4 | 4 | 0 |

Comment: Van Puijenbroek has a stable supplier base of five main suppliers in Tunisia and Macedonia, with whom it has been working for a long time. At four of these suppliers, it has 100% leverage. It uses the other factories in Macedonia, Tunisia and Laos to support production of its main factories.

| | 1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years | 75% | Stable business relationships support most aspects of the Code of Labour Practices, and give factories a reason to invest in improving working conditions. | Supplier information provided by affiliate. | 4 | 4 | 0 | |
|--|--|-----|--|---|---|---|---|--|
|--|--|-----|--|---|---|---|---|--|

Comment: Van Puijenbroek values long-term relationships, especially with its main suppliers. It works with these suppliers for many years and has invested much effort to improve labour conditions at these suppliers. It has sourced small amounts from a factory in Laos and is currently looking for new partners in Eastern Asia.

| 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: In 2015, Van Puijenbroek started to work with new suppliers in Tunisia and Macedonia and had received a copy of the questionnaire.

| 1.4 Company conducts human rights due diligence at all new suppliers before placing orders. 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: A risk analysis as part of the decision-making process of selecting new suppliers is an important step to mitigate risk and prevent potential problems. In addition to their current process and information FWF advises Van Puijenbroek to use information from existing audit reports, human rights reports and local stakeholders, especially in countries where it does not have local staff. FWF can offer information on local stakeholders.

Comment: Van Puijenbroek conducts due diligence before placing orders at new suppliers by visiting the production location, using the FWF Health and Safety Check, discussing social compliance and reporting on this. Van Puijenbroek has a long history of sourcing in Tunisia and Macedonia and is aware of risks associated with sourcing from these countries. It is using the CSR Risk Checker of MVO Nederland for the countries it is currently exploring. In some cases, Van Puijenbroek asks for an existing audit report in advance.

Van Puijenbroek uses a scoring system for new suppliers. Labour conditions is one of the indicators.

| 1.5 Supplier compliance with Code of Labour Practices is evaluated in a systematic manner. | social compliance in | nto normal business sorts good decisionmaking. | Documentation of systemic approach: rating systems, checklists, databases, etc. | 1 | 2 | 0 |
|--|----------------------|--|---|---|---|---|
|--|----------------------|--|---|---|---|---|

Recommendation: FWF encourages Van Puijenbroek 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: Van Puijenbroek has a strong system of improving and maintaining supplier compliance with FWF Code of Labour Practices. It has local people in all of its production countries that visit factories on at least a weekly basis. During factory visits, reports are written that systematically include social compliance elements. The CEO of Van Puijenbroek collects all reports and keeps track of progress in systematic manner.

Improved supplier compliance with Code of Labour Practices is currently not rewarded in any quantifiable way.

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

Comment: With almost all of its suppliers, Van Puijenbroek has a weekly planning system that is based on the known weekly capacity of the factory as calculated including available hours and number of workers. If a factory shows that it produces more than planned, it will be rewarded with more orders. The opposite is also true, if a factory falls behind in its production, the weekly production order will be reduced (with a lag of a few weeks) in order to allow the factory to catch up to the orders. With a few factories where it places small orders it only discusses the number of minutes to be used for a product.

Van Puijenbroek has a lead time of 5-6 weeks for its Tunisian and Macedonian suppliers. It has included some extra delivery time so that in case of an unexpected delay, the factory has sufficient production time. Van Puijenbroek also ensures that it has enough products on stock to prevent rush orders.

For custom made specials, Van Puijenbroek has a shorter lead time, but always discusses reasonable lead times with its factories. It has reserved one special line at one of its factories for rush orders.

| 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: Van Puijenbroek should gather information regarding working hours at (new) suppliers in countries where excessive overtime is a high-risk, like in Laos.

Comment: All main suppliers of Van Puijenbroek have been FWF audited. None of the FWF audits found excessive overtime. Van Puijenbroek prevents excessive overtime by its weekly planning system and shifting orders to other suppliers if necessary. Local staff regularly visit factories and check working hours and production lines. In some of its factories in Tunisia, workers do not work the regular 48 hours per week, but only work 44 hours and have some extra holidays.

For its new suppliers and its supplier in Laos, Van Puijenbroek does not have recent information regarding possible use of overtime.

| 1.8 Affiliate's pricing policy allows for payment of at least the legal minimum wages in production countries. | Country-level policy | The first step towards ensuring the payment of minimum wages - and towards implementation of living wages - is to know the labour costs of garments. | Formal systems to calculate labour costs on per-product or country/city level. | 2 | 4 | 0 | |
|--|-------------------------|--|--|---|---|---|--|
| | | the taubul costs of gailletts. | or country/ city tevet. | | | | |

Comment: Van Puijenbroek works with SAM and information on wages in the country are used to set the prices. It relies on FWF audits to get details on the payment of wages. Van Puijenbroek is aware of legal minimum wage levels and CBA wage levels in Tunisia and Macedonia.

| 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 | |
|---|--|--|---|---|---|----|--|
|---|--|--|---|---|---|----|--|

Comment: All FWF audits confirm that at least the legal minimum wage is paid in those factories.

| 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 Van Puijenbroek to assess the hypothetical cost effects of increasing wages towards higher benchmarks (estimates of living wage) that are included in the wage ladder by calculating the labour minute costs. To support companies in this process FWF has developed a calculation model.

Comment: Van Puijenbroek is aware of wage levels in its factories and the wage ladders in the FWF audit reports at its main suppliers. Workers receive a wage that is above the local wage set by CBA in Macedonia.

| 1.12 Affiliate sources from an FWF factory No member. | 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. | 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. | 1 | 2 | 0 |

Comment: Van Puijenbroek owned two factories in Tunisia and Macedonia. Due to the security situation in Tunisia enough presence in the factory could not be ensured anymore, and the company decided to sell the factory, with guaranteed production for the coming years and in that way, ensured employment.

PURCHASING PRACTICES

Possible Points: 42

2. MONITORING AND REMEDIATION

| BASIC MEASUREMENTS | RESULT | COMMENTS |
|---|--------|--|
| % of own production under standard monitoring (excluding low-risk countries) | 93% | |
| % of own production in low risk production countries where FWF's Low Risk policy has been implemented | N/A | 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 |

Comment: The CEO of Van Puijenbroek, in cooperation with local staff in Tunisia and Macedonia, is responsible to monitor and follow up on issues.

| 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 recommends Van Puijenbroek to continue working on more complex issues like living wage. As part of its sourcing strategy, it should also acquire audit reports and commence follow up at the start of the relationship.

Comment: Audits performed showed good working conditions and effective follow-up in both Macedonia and Tunisia. Overtime was not an issue in any audited factories. Most factories, especially the ones where it has 100% leverage, have active unions in place. More complex and long-term issues like living wage remain.

Its main factories have not reached a living wage level yet. Worker awareness on their labour rights and the FWF worker helpline is also low in Tunisia.

Van Puijenbroek has not yet set up a CAP with its new suppliers and its supplier in Laos.

| 2.3 Percentage of production volume from suppliers that have been visited by the affiliate in the past financial year | 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 | | 4 | 0 | |
|---|---|-----------------------------------|---|---|--|
| | Code of Labour Practices. | the date and name of the visitor. | | | |

Comment: Van Puijenbroek has local staff that pay regular visits to the suppliers.

| quality assessments. |
|----------------------|
|----------------------|

Recommendation: FWF recommends Van Puijenbroek to obtain existing audit reports. 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: At some suppliers, Van Puijenbroek asked for an existing audit report, but does not do this systematically. Van Puijenbroek did not obtain any existing audit report from suppliers that have not been FWF audited, including its new suppliers.

| 2.5 Audit Report and Corrective Action Plan (CAP) findings are shared with factory. Improvement timelines are established in a timely manner | 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 2 Plans, emails; findings of followup audits; brand representative present during audit exit meeting, etc. | 2 | -1 | |
|--|---|--|---|----|--|
|--|---|--|---|----|--|

Comment: In 2015, FWF conducted two audits that were shared and discussed with the factory in a timely manner.

| supply chain are identified and addressed by the monitoring system. Capacity risks associated with them; monitoring systems should be adapated to allow appropriate human rights due diligence for the specific risks in each affiliates' supply chain. Take many forms; additional research, specific FWF project participation; extra monitoring activities, extra mitigation activities, etc. | systems should be adapated to allow appropriate human rights due diligence for the specific risks in each affiliates' supply chain. systems should be adapated to allow additional research, specific FWF project participation; extra monitoring activities, extra mitigation |
|---|---|
|---|---|

Recommendation: Knowing the country specific risks facilitates the starting point for discussing this with suppliers. Van Puijenbroek could further improve its monitoring system by making use of existing information from local stakeholders on human rights and could actively acquire existing audit reports, especially in countries where it does not have local staff.

Comment: Van Puijenbroek has a long history of sourcing from Macedonia and Tunisia and is well aware of risks associated with sourcing from these countries. It has local staff in these two countries and there are regular FWF audits.

In 2015, it had one supplier in Laos. It uses the CSR Risk Checker of MVO Nederland to know the human rights risks in a particular country where it does not have local staff.

| 2.6a High risk issues specific to Bangladesh are identified and adressed 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 adressed 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 production in lowrisk countries | 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. | N/A | 2 | 0 |

| 2.9 External brands resold by the affiliate who have completed and returned the external brand questionnaire. (% of external sales volume) | 80% | 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. | 2 | 3 | 0 | |
|--|-----|--|-----------------------------|---|---|---|--|
|--|-----|--|-----------------------------|---|---|---|--|

Recommendation: FWF encourages Van Puijenbroek to collect all questionnaires from external producers.

Comment: Van Puijenbroek sends out the questionnaire to external brands and has a signed copy of most of them. Out of the 12 external producers, it had 9 questionnaires returned.

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

MONITORING AND REMEDIATION

Possible Points: 31

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: The CEO of Van Puijenbroek is responsible for complaints handling.

| 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, | 0 | 2 | 0 |
|---|----|---|---|---|---|---|
| | | | checklists from factory visits, etc. | | | |

Requirement: Van Puijenbroek 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. It should check by means of a visit whether the Worker Information Sheet is posted in the factories.

Comment: At almost all of its suppliers, Van Puijenbroek checks whether the Worker Information Sheet is posted by visiting the factory, through FWF audits and sometimes by asking for pictures of the Worker Information Sheet. During this Brand Performance Check, Van Puijenbroek could not show proof of the CoLP being posted at some suppliers.

| 3.3 Percentage of FWF-audited factories where at least half of workers are aware of the FWF worker helpline. | 50% | 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. | 3 | 4 | -2 |
|--|--|--|--|-----|---|----|
| 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 |

COMPLAINTS HANDLING

Possible Points: 7
Earned Points: 4

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: Van Puijenbroek staff is informed about FWF and what it means for them in their daily business. FWF requirements are also discussed during weekly meetings between relevant staff.

| 4.2 Ongoing training in support of FWF requirements is provided to staff in direct contact with suppliers. | No | Sourcing, purchasing and CSR staff at a minimum should possess the knowledge necessary to implement FWF requirements and advocate for change within their organisations. | FWF Seminars or equivalent trainings provided; presentations, curricula, etc. | 0 | 2 | 0 | |
|--|----|--|---|---|---|---|--|
| | | organisations. | comcota, etc. | | | | |

Recommendation: FWF recommends Van Puijenbroek to ensure that sourcing, purchasing and CSR staff receive training focused on the more complex issues like freedom of assocation and living wage.

Comment: Van Puijenbroek did not visit the FWF annual conference, participate in webinars or other trainings.

| 4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices. Affiliation not us agent | 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 value agents, trainings agents, FWF aud findings. | - | 2 | -2 | |
|--|---|---|---|----|--|
|--|---|---|---|----|--|

| 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 acommon issue in factories. Good quality training of workers and managers is a key step towards | Documentation of relevant trainings; participation in Workplace Education | 0 | 6 | 0 | |
|---|----|---|---|---|---|---|--|
| | | sustainable improvements. | Programme. | | | | |

Recommendation: FWF recommends Van Puijenbroek to discuss with suppliers whether additional training would be needed to ensure workers are kept up to date on labour standards and grievance mechanisms.

Comment: Van Puijenbroek and the suppliers in Macedonia and Tunisia have over the years invested in informing workers about the FWF Code of Labour Practices and the helpline and ensure also new employees receive the information. Suppliers did not participate in FWF WEP sessions.

| 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 | |
|---|---------------------------------|--|---|-----|---|---|--|
|---|---------------------------------|--|---|-----|---|---|--|

Comment: Van Puijenbroek has one factory in Laos, where WEP-training is not offered. This supplier did not receive any training to ensure workers and management are well informed about labour standards.

TRAINING AND CAPACITY BUILDING

Possible 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 |

Comment: Van Puijenbroek is aware of where all its production takes place because of its local staff in production countries. Besides checking on quality and delivery time, local staff also checks lines and capacity. Van Puijenbroek has a strict policy on subcontracting. Therefore the risk of unauthorized subcontracting is low.

| 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: There is an online system that shows all the things that are related to FWF and social compliance. Staff can access relevant files, like audits, follow up reports, etc.

INFORMATION MANAGEMENT

Possible Points: 7

6. TRANSPARENCY

| PERFORMANCE INDICATORS | RESULT | RELEVANCE OF INDICATOR | DOCUMENTATION | SCORE | MAX | MIN |
|---|--------|---|---|-------|-----|-----|
| 6.1 Communication about FWF membership adheres to the FWF communications policy | No | 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. | -2 | 1 | -2 |

Requirement: FWF membership should be communicated according to the FWF communications policy.

Comment: In 2015, on-garment communication was found in one product line, while it did not have leader status as is required currently for the use of on garment communication.

| 6.2 Affiliate engages in advanced reporting activities | 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. | 1 | 1 | 0 | |
|--|---|---|---|---|---|--|
|--|---|---|---|---|---|--|

Recommendation: FWF recommends Van Puijenbroek to consider publishing audit findings and supplier information to increase transparency.

Comment: Van Puijenbroek has published the latest Brand Performance Check-report.

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

Comment: Van Puijenbroek has submitted its social report and has published it online.

TRANSPARENCY

Possible Points: 4

7. EVALUATION

| PERFORMANCE INDICATORS | RESULT | RELEVANCE OF INDICATOR | DOCUMENTATION | SCORE | MAX | MIN |
|--|--------|---|--|-------|-----|-----|
| 7.1 Systemic annual evaluation of FWF membership is conducted with involvement of top management | Yes | An annual evaluation involving top management ensures that FWF policies are integrated into the structure of the company. | Meeting minutes, verbal reporting, Powerpoints, etc. | 2 | 2 | 0 |

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

| 7.2 Changes from previous Brand Performance Check implemented by affiliate | | 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 | |
|--|--|---|--|----|---|----|--|
|--|--|---|--|----|---|----|--|

Requirement: Van Puijenbroek is required to work towards remediation of previous requirements from the former FWF Brand Performance Check.

Comment: Van Puijenbroek had only one requirement in the last Brand Performance Check. It should have ensured that the Worker Information Sheet is posted in all factories it sources from and show proof of that. During this Brand Performance Check, Van Puijenbroek was unable to show that the Worker Information Sheet was posted in some of its factories where smaller amounts are produced.

EVALUATION

Possible Points: 6

RECOMMENDATIONS TO FWF

Van Puijenbroek recommends FWF to:

- Invest more in knowledge sharing during the annual conference;
- not include WEP-trainings as a requirement for the FWF membership and Brand Performance Check;
- to advise and consult Van Puijenbroek more often;
- to focus more on the origin of resources, where labour standards are largely at stake. Most work wear companies, including Van Puijenbroek, buy its own fabric what gives them leverage over and responsibility towards these suppliers.

SCORING OVERVIEW

| CATEGORY | EARNED | POSSIBLE |
|--------------------------------|--------|----------|
| Purchasing Practices | 34 | 42 |
| Monitoring and Remediation | 21 | 31 |
| Complaints Handling | 4 | 7 |
| Training and Capacity Building | 1 | 9 |
| Information Management | 7 | 7 |
| Transparency | 1 | 4 |
| Evaluation | 0 | 6 |
| Totals: | 68 | 106 |

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

64

PERFORMANCE BENCHMARKING CATEGORY

Good

BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

21-06-2016

Conducted by:

Wilco van Bokhorst

Interviews with:

Rob Kwaspen - CEO
Willy van Rooy - Finance
Paul Huizing - Supply chain and logistics
Arthur van Bergen- Supply chain
Mirjam Bierings - Confection
Albert Linssen- Sales
Els de Ridder - Communication

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.