



BRAND PERFORMANCE CHECK

Uniform Brands

PUBLICATION DATE: AUGUST 2017

this report covers the evaluation period 01-01-2016 to 31-12-2016

ABOUT THE BRAND PERFORMANCE CHECK

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

FWF's Brand Performance Check is a tool to evaluate and report on the activities of FWF's member companies. The Checks examine how member company management systems support FWF's Code of Labour Practices. They evaluate the parts of member company 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 product locations, and most product locations work for many different brands. This means that in most cases FWF member companies have influence, but not direct control, over working conditions. As a result, the Brand Performance Checks focus primarily on verifying the efforts of member companies. Outcomes at the product location level are assessed via audits and complaint reports, however the complexity of the supply chains means that even the best efforts of FWF member companies cannot guarantee results.

Even if outcomes at the product location level cannot be guaranteed, the importance of good management practices by member companies cannot be understated. Even one concerned customer at a product location 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 product location 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 member company 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

Uniform Brands

Evaluation Period: 01-01-2016 to 31-12-2016

MEMBER COMPANY INFORMATION	
Headquarters:	Doetinchem, Netherlands
Member since:	01-05-2008
Product types:	Workwear
Production in countries where FWF is active:	Bangladesh, China, Tunisia
Production in other countries:	Hungary, 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
SCORING OVERVIEW	
% of own production under monitoring	93%
Benchmarking score	54
Category	Good

Summary:

Uniform Brands B.V. has met most of FWF's performance requirements in 2016. With a monitoring percentage of 93%. Uniform Brand meets the required monitoring threshold for members after three years of membership. With a score of 54 points, Uniform Brands falls in the 'good' category.

Uniform Brands' main production facility is in Tunisia, with several satellite locations in the region to support its production. A considerable amount also comes from factories in low-risk countries Hungary and Portugal. In 2016, it sourced small production volumes from suppliers in China and Bangladesh. Uniform Brands has long-term relationship with most of these suppliers.

The main supplier in Tunisia and two subcontractors were audited in 2016. Results showed issues concerning wages, health and safety and a lack of awareness of labour rights, the FWF Code of Labour Practices, and the FWF worker helpline. A WEP-basic training session was organised at the main Tunisian supplier to increase awareness of management and workers on the FWF CoLP, labour standards and the FWF worker helpline. Follow up at the subcontractors took a very long time. Uniform Brands should ensure that active and immediate remediation is done after an audit.

Uniform Brands produced small production volumes at several Chinese and Bangladeshi suppliers.

The brand is aware of subcontractors in China and Bangladesh. The Bangladeshi subcontractor is a member of the Bangladeshi Accord on Fire and Building Safety, while the main Bangladeshi supplier is not. The Accord audit reports show the subcontractor's progress on fire safety and health and safety issues, but critical issues were still found. Uniform Brands did not actively follow up on the audit reports. In case Uniform Brands resumes production at those suppliers, it needs to ensure that it properly conducts human rights due diligence.

FWF requires Uniform Brands to ensure that a signed copy of the FWF questionnaire is received and the FWF Code of Labour Practices is posted prior to placing orders at any new factories. Uniform Brands also needs to follow up faster and more actively in case factories do not pay at least the legal minimum wage, as was the case at one of its Tunisian subcontractors. Also, Uniform Brands should ensure that active and immediate remediation is done after an audit.

PERFORMANCE CATEGORY OVERVIEW

Leader: This category is for member companies 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 member companies who are making a serious effort to implement the Code of Labour Practices—the vast majority of FWF member companies—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 member companies will receive a 'Good' rating.

Needs Improvement: Member companies 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. Member companies 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: Member companies 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. Member companies 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
1.1a Percentage of production volume from production locations where member company buys at least 10% of production capacity.	93%	Member companies with less than 10% of a production location's production capacity generally have limited influence on production location managers to make changes.	Supplier information provided by member company.	4	4	0

Comment: Uniform Brands has one main supplier in Tunisia from which it sources most of its production. It uses several Tunisian satellite locations to support its main production facility. It has another supplier in Hungary. Leverage at its Tunisian and Hungarian partners is high. Furthermore, Uniform Brands sources from factories in China, Bangladesh, and Portugal where it only has low leverage. Over the last years, it has pursued an active strategy of consolidating its supply base.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.1b Percentage of production volume from production locations where member company buys less than 2% of its total FOB.	3%	FWF provides incentives to clothing brands to consolidate their supplier base, especially at the tail end, as much as possible, and rewards those members who have a small tail end. Shortening the tail end reduces social compliance risks and enhances the impact of efficient use of capital and remediation efforts.	Production location information as provided to FWF.	3	4	0

Comment: Uniform Brands sources small production orders from four Chinese factories. These factories make specific products for Uniform Brands and cannot be easily replaced.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.2 Percentage of production volume from production locations 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 production locations a reason to invest in improving working conditions.	Supplier information provided by member company.	4	4	0

Comment: Uniform Brands values long-term relationships and has such relationships with most of its suppliers in Tunisia, Portugal and Hungary. In the last few years, Uniform Brands started to shift its production towards China and Bangladesh but has not started to move a significant portion of its production volume to these countries. The company rather remains focused on production in Tunisia.

Recommendation: FWF recommends Uniform Brands 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.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.3 All new production locations are required to sign and return the questionnaire with the Code of Labour Practices before first bulk orders are placed.	No	The CoLP is the foundation of all work between production locations and brands, and the first step in developing a commitment to improvements.	Signed CoLPs are on file.	0	2	0

Comment: Uniform Brands started a new relationship with a Chinese subcontractor in 2016. The questionnaire was not sent to the subcontractor.

Requirement: Uniform Brands needs to ensure that new suppliers sign and return the questionnaire before first orders are placed.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.4 Member company conducts human rights due diligence at all new production locations before placing orders.	Intermediate	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.	2	4	0

Comment: When selecting new suppliers, Uniform Brands conducts due diligence by visiting the supplier and discussing labour standards. The company increasingly asks for existing audit reports. Uniform Brands is aware of high risks in countries like Tunisia, China and Bangladesh. The outcomes of an audit report are included in the decision-making process. Both a country risk assessment and the evaluation of audit reports is not yet done in a systematic manner.

Recommendation: A risk analysis as part of the decision-making process of selecting new suppliers is an important step to mitigate risk and prevent potential problems. FWF recommends Uniform Brands to assess the risks associated with operating in specific production areas in a systematic manner. FWF advises to use information from FWF country studies and wage ladders and use the FWF Health and Safety guidelines.

Conducting pre-audits or analysing existing audit reports can be a way to assess the level of working conditions before deciding to start or continue the business relationship. Furthermore, It is advised to describe the process of assessing working conditions at potential new suppliers in a sourcing strategy that is agreed upon with top management/sourcing staff.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.5 Production location 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

Comment: Uniform Brands sources from a small range of suppliers. The brand has monitored its suppliers in Tunisia. It regularly discusses audit results and updates the CAP with its main Tunisian supplier. Progress made by the satellite production locations is registered in visit reports made by the Head of Finance. Uniform Brands is not aware of the situation at its Chinese and Bangladeshi suppliers and does not evaluate their compliance with the Code of Labour Practice. The brand does not yet have a system in place to record follow up at all of its suppliers in a consistent manner.

Although Uniform Brands sometimes rewards good performance on social compliance with more orders, the brand does not yet do this in a clear and consistent manner. It has not yet set up a clear evaluation method and shared that with the factories.

Recommendation: Uniform Brands is encouraged to develop an evaluation/grading system for suppliers where compliance with labour standards is a criterion for future order placement. Part of the system can be to create an incentive for rewarding suppliers for realized improvements in working conditions and to show whether and what information is missing per supplier. The evaluation can include outcomes of audits, training and/or complaints.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.6 The member company's production planning systems support reasonable working hours.	General or ad-hoc system.	Member company production planning systems can have a significant impact on the levels of excessive overtime at production locations.	Documentation of robust planning systems.	2	4	0

Comment: The majority of Uniform Brands' production takes place in Tunisia, where it has a factory with a number of satellite production facilities located in the vicinity. For these factories, it knows what the standard working minutes are for each product. This, in combination with knowing the production capacity, allows Uniform Brands to plan production in a way that avoids overtime. If there is insufficient production capacity at its own supplier, orders are outsourced to one of the satellite production facilities.

The main Tunisian factory closely plans production with these satellite production locations. Recent audits at both the main supplier and subcontractors show that excessive overtime is not an issue. Workers often worked reduced hours due to insufficient orders. Despite the fact that Uniform Brands knows these production locations and most have been FWF-audited, it is not involved in the decision-making process about placing orders at subcontractors when production capacity is needed. Uniform Brands is informed after production took place. Because production shifts between subcontractors, it limits the ability for Uniform Brands to maintain stable relationships and improve working conditions.

For the production location in Hungary, it also works with standard working minutes. For the Portuguese supplier, Uniform Brands asks for an estimate on when the products can be delivered. Both of these production locations are located in low-risk countries, meaning that audits are not necessary as local institutions are capable of protecting workers' rights. For the above-mentioned production locations, Uniform Brands has a strong, integrated system in place to support reasonable working hours.

However, in 2016 it also placed some production at production locations in China and Bangladesh. Uniform Brands does not discuss planning with these suppliers, but gives a lead-time of 14-16 weeks and flexibility as to the production planning and delivery. Due to the small amount of orders placed and the low leverage Uniform Brands has at these suppliers, the brand expects that the orders given would not affect the production process of these factories that much.

Recommendation: FWF strongly encourages Uniform Brands to further integrate planning with the satellite production locations. It should put a strategy in place towards its subcontractors to maintain stable business relationships and work on improving working conditions.

Furthermore, FWF recommends Uniform Brands to establish a production planning system tailored to the situation in China and Bangladesh that supports reasonable working hours. It is advised to establish a system for sharing and updating forecasts with suppliers to facilitate their planning. The system may include assurance of early delivery of materials and trimmings to suppliers, ensuring samples are approved in time and that late changes are discussed with the supplier. The brand could learn more about the production capacity of the factories and how Uniform Brands' orders impact that production capacity.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.7 Degree to which member company mitigates root causes of excessive overtime.	No production problems /delays have been documented.	Some production delays are outside of the control of member companies; however there are a number of steps that can be taken to address production delays without resorting to excessive overtime.	Evidence of how member responds to excessive overtime and strategies that help reduce the risk of excessive overtime, such as: root cause analysis, reports, correspondence with factories, etc.	N/A	6	0

Comment: Recent FWF-audits at its production locations in Tunisia did not indicate that excessive overtime took place. In China and Bangladesh, workers in the garment industry are at a high risk of working excessive overtime. Uniform Brands did not undertake efforts to mitigate the very real risks related to overtime, for example by collecting existing audit reports and following up on working hours.

At the time of the Brand Performance Check, no orders were placed at the Chinese and Bangladeshi suppliers anymore.

Recommendation: When Uniform Brands returns to placing orders at its Bangladeshi and Chinese suppliers, it should ensure that it learns more about the high risks of excessive overtime. In case excessive overtime takes place, the brand should engage with suppliers to mitigate this issue. A first step would be to ask for existing audit reports and discuss those with the suppliers.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.8 Member company'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

Comment: In Tunisia, Uniform Brands knows the working minutes required for each product-style. The brand also calculates the working minute price with a price surcharge or discount depending on the order volume. Negotiations are focused on the standard minutes per style. Uniform Brands is also aware of the legal minimum wage levels. Increases in minimum wage levels are covered by a price increase.

Uniform Brands does not know the working minute price for their suppliers in Bangladesh and China and is not aware of the legal minimum wage levels in these countries. Uniform Brands tries to estimate market-based prices by comparing them to other suppliers. It negotiates prices in a partnership manner and does not push for lower prices.

Recommendation: At a minimum, Uniform Brands is recommended to investigate wages levels in production countries, among others by making use of FWFs 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. In case Uniform Brands resumes production in China and Bangladesh, it should know the legal minimum wage levels and ensure that its prices support at least the legal minimum wage.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.9 Member company actively responds if suppliers fail to pay legal minimum wages.	No	If a supplier fails to pay minimum wage, FWF member companies 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: Three Tunisian suppliers were audited by FWF in September 2016. One audit report showed that the supplier did not always pay the legal minimum wage. Uniform Brands discussed this with the supplier, but only long after the audit report was provided to Uniform Brands. Factory management claims that the legal minimum wage is now paid. Uniform Brands did not yet verify whether this was actually the case.

Uniform Brands is not aware of the level of wages paid in the factories in China and Bangladesh, and is therefore at a significant risk that its suppliers do not pay the legal minimum wage.

Requirement: If a supplier fails to pay minimum wages, FWF members are expected to hold management of the supplier accountable for respecting local labour law and require a time bound action plan to ensure adequate payment. Factory visits with a documents check or additional verification by FWF may be needed to verify remediation.

Recommendation: Uniform Brands should ensure that it knows whether the legal minimum wage is paid at its Tunisian subcontractors. For its Chinese and Bangladeshi suppliers, Uniform Brands should at least discuss whether the legal minimum wage is paid and collect already existing audit reports to know more of the wage levels in these factories.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.10 Evidence of late payments to suppliers by member company.	No	Late payments to suppliers can have a negative impact on production locations 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 production location and member company financial documents.	0	0	-1

Comment: During the FWF audit at its main Tunisian supplier in 2016, it was found that Uniform Brands was behind with a payment. This had an effect on the payment of wages. Uniform Brands followed up on this and ensured immediate payment.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.11 Degree to which member company 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 member companies' policies.	Documentation of policy assessments and/or concrete progress towards living wages.	2	8	0

Comment: At its main Tunisian supplier, Uniform Brands is aware of the wage levels. It is also aware of the FWF wage ladder and which steps it needs to take to come to a living wage. Because Uniform Brands is in the same holding with Simon Jersey and its main Tunisian supplier, it has access to costing data. At its other Tunisian suppliers, Uniform Brands knows from FWF-audits what the wage levels are at these factories and can compare them to living wages.

It is not aware of wage levels at its suppliers in China and Bangladesh. It did not take any steps to discuss living wages with these suppliers.

Requirement: Uniform Brands is expected to take an active role in discussing living wages with its suppliers. The FWF wage ladder can be used as a tool to implement living wages. Most relevant wage estimates, such as local minimum wage, Asia Floor 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.

Due to the high leverage at its main Tunisian supplier, the fact that the factory is part of the same group and it has easy access to costing data, Uniform Brands is held more accountable for implementing adequate steps to implement a living wage. The brand needs to learn more about actual costs, including direct labour costs.

Recommendation: A possible next step would be to assess labour costs at its main Tunisian supplier, including direct and indirect labour costs and relate that to its standard minute price. It could use this knowledge to compare prices and wages at other Tunisian suppliers. Uniform Brands should assess the hypothetical cost effects of increasing wages towards benchmarks that are included in the wage ladder. To support companies in this process FWF has developed a calculation model that estimates the effect on FOB and retail prices under different pricing models.

FWF has developed experience with approaches that ensure that production workers in the selected facility take full benefit from the additional amounts that are committed to wage increases. FWF could give companies specific guidance on process roll out on request. Furthermore, FWF encourages Uniform Brands to participate in the FWF Living Wage Incubator.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.12 Percentage of production volume from factories owned by the member company (bonus indicator).	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 member company's score.	Supplier information provided by member company.	N/A	2	0

Comment: Uniform Brands' main supplier is owned by the same holding, but it does not own this production facility itself.

PURCHASING PRACTICES

Possible Points: 38

Earned Points: 18

Additional comments on Purchasing Practices:

The holding Uniform Brands Ltd. exists of Simon Jersey Ltd., Uniform Brands B.V., Ballyclare Ltd. and Crown East North Africa. Uniform Brands B.V. knows the production locations of the other companies. Together with Simon Jersey, it is exploring whether it can share production locations more actively. Therefore, Uniform Brands B.V. started sourcing in the Far East in the last few years. The factories Simon Jersey sources from require the placement of high production volumes. Currently, Uniform Brands B.V. cannot yet meet those requirements. Within the holding, discussions are taking place about moving production to the Far East or expanding production capacity of its Tunisian daughter enterprise.

2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	81%	
% of production volume where monitoring requirements for low-risk countries are fulfilled	12%	FWF low risk policy should be implemented. 0 = policy is not implemented correctly. N/A = no production in low risk countries.
Meets monitoring requirements for tail-end production locations.	No	Implementation will be assessed next Brand Performance Check
Total of own production under monitoring	93%	Minimums: 1 year: 40%; 2 years 60%; 3 years+: 80-100% 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 Head of Finance is responsible for the monitoring process.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.2 Quality of own auditing system meets FWF standards.	Member makes use of FWF audits and/or external audits only	In case FWF teams cannot be used, the member companies' own auditing system must ensure sufficient quality in order for FWF to approve the auditing system.	Information on audit methodology.	N/A	0	-1

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.3 Audit Report and Corrective Action Plan (CAP) findings are shared with factory and worker representation where applicable. Improvement timelines are established in a timely manner.	No Corrective Action Plans were active during the previous year	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.	-1	2	-1

Comment: Three FWF audits were conducted at its main Tunisian supplier and two subcontractors in 2016. It has shared the audit report with its main Tunisian supplier, which set up a shortened CAP and a timeline.

The FWF audit reports of its subcontractors were shared with the factories only after several months. Uniform Brands discussed several issues with the supplier, but only long after the audit report was provided to Uniform Brands. No improvement timelines were set up. Uniform Brands ceased production at its subcontractors at the end of 2016.

Requirement: Uniform Brands is required to share and discuss the audit report and CAP findings with the factory within 2 months. A reasonable time frame should be specified for resolving findings. In case worker representation is applicable the CAP should be shared with worker representative as well as involved in setting the time frame for realizing improvements.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.4 Degree of progress towards resolution of existing Corrective Action Plans and remediation of identified problems.	Basic	FWF considers efforts to resolve CAPs to be one of the most important things that member companies can do towards improving working conditions.	CAP-related documentation including status of findings, documentation of remediation and follow up actions taken by member. Reports of quality assessments. Evidence of understanding relevant issues.	4	8	-2

Comment: The FWF audit at Uniform Brands' main Tunisian supplier showed issues concerning health and safety, wages, contracts and a lack of awareness of the FWF CoLP and FWF worker helpline. The supplier has worked on documentation. A WEP-basic training session was organized to increase awareness of the FWF CoLP and FWF worker helpline.

Uniform Brands discussed the audit results with the two subcontractors. It mostly focused on health and safety issues and wages. It set up a timeline for few specific health and safety issues. The brand did not verify whether improvements were actually made. It ceased production at these subcontractors at the end of 2016.

It has not received audit reports from its Bangladeshi and Chinese suppliers and did not discuss follow up.

Requirement: Uniform Brands needs to take a more active position towards following up on audit results. The brand needs to monitor progress of its suppliers more closely and verify remediation efforts. FWF expects Uniform Brands to examine and support remediation of any problem that they encounter.

Recommendation: To facilitate remediation, Uniform Brands could consider:

- to assist factories in developing an action plan and to assist factory management in investigating root causes. Concerning the verification of wages and documentation, it could plan a monitoring visit of the local FWF audit team or ask the accountant of the main Tunisian supplier to support the subcontractors in setting up a proper documentation system and the correct payment of wages.
- provide factory training;
- share knowledge/material;
- provide financial support to the supplier for implementing improvements.

FWF strongly recommends Uniform Brands to collect existing audit reports and actively follow up in case it resumes production in China and Bangladesh.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.5 Percentage of production volume from production locations that have been visited by the member company in the previous financial year.	93%	Formal audits should be augmented by annual visits by member company staff or local representatives. They reinforce to production location managers that member companies are serious about implementing the Code of Labour Practices.	Member companies should document all production location visits with at least the date and name of the visitor.	4	4	0

Comment: Uniform Brands visited all its production locations in China, Bangladesh, Tunisia and Hungary. Only the Portuguese supplier was not visited last year.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.6 Existing audit reports from other sources are collected.	No	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.	0	3	0

Comment: In 2016, Uniform Brands did not collect any existing audit report from its suppliers.

Recommendation: Existing reports form a basis for understanding the issues and strengths of a supplier, and reduces double work. Existing audits can be counted towards the monitoring threshold if the quality of the report is assessed using the FWF audit quality tool and corrective actions are implemented.

FWF strongly recommends Uniform Brands to collect existing audit reports from its Chinese and Bangladeshi suppliers when it resumes production.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.7 Compliance with FWF risk policies.	Insufficient result on all relevant policies	Aside from regular monitoring and remediation requirements under FWF membership, countries, specific areas within countries or specific product groups may pose specific risks that require additional steps to address and remediate those risks. FWF requires member companies to be aware of those risks and implement policy requirements as prescribed by FWF.	Policy documents, inspection reports, evidence of cooperation with other customers sourcing at the same factories, reports of meetings with suppliers, reports of additional activities and/or attendance lists as mentioned in policy documents.	-2	6	-2
Compliance with FWF enhanced monitoring programme Bangladesh	Insufficient			-2	6	-2
Compliance with FWF Myanmar policy	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on abrasive blasting	Policies are not relevant to the company's supply chain			N/A	6	-2

Comment: Uniform Brands is active in Bangladesh. In 2016, it sourced a small size of its production from a Bangladeshi supplier and its subcontractor. Uniform Brands did not collect an existing audit report or organized a FWF audit. Only the subcontractor is a member of the Bangladesh Accord on Fire and Building Safety.

On the website of the Accord it can be found that the factory was audited on health and safety issues several times, showing that the factory improved working conditions, but critical issues concerning fire safety and health and safety were still found. The main supplier is not a member of the Accord and has not been audited by the Accord of FWF on labour conditions, like fire and building safety, nor did it receive a training on this topic. Uniform Brands did not take measures to mitigate the high risks of Gender Based Violence, for example by stimulating participation in the WEP Gender Based Violence-module. Uniform Brands had stopped production at these suppliers at the time of the Brand Performance Check.

The brand does not source from Myanmar or make use of abrasive blasting. It is generally aware of high risks in Tunisia and China.

Requirement: In case Uniform Brands resumes production at its Bangladeshi suppliers, it should make sure that all production locations participate in the fire and building safety awareness raising workshop for top management as a basic requirement of the enhanced programme on monitoring and remediation. FWF offers the workshop at least twice a year in Bangladesh.

Recommendation: Uniform Brands should share responsibilities with their production locations as business partners to improve workers' safety at the workplace. At the minimum, Uniform Brands should provide necessary support to the suppliers. In terms of fire and building safety, the member could offer financial or technical support, or offer flexible lead time so that factories could prioritize remediation. In terms of ensuring women's safety at work, the brand should make sure that suppliers have sufficient knowledge and a functional system to promote gender equality and prevent gender based violence. A functional system to prevent violence needs involvement of both factory management and workers representatives. FWF local team has extensive experience on supporting both employees and employers in setting up anti-harassment systems. FWF local team could provide training and regular support to suppliers upon request.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.8 Member company cooperates with other FWF member companies in resolving corrective actions at shared suppliers.	No CAPs active, no shared production locations or refusal of other company to cooperate	Cooperation between customers increases leverage and chances of successful outcomes. Cooperation also reduces the chances 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

Comment: At one Chinese supplier, two other FWF members were also active. Uniform Brands was not yet informed by FWF about their presence. Therefore, the indicator was rated N/A.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.9 Percentage of production volume where monitoring requirements for low-risk countries are fulfilled.	50-100%	Low-risk countries are determined by the presence and proper functioning of institutions which can guarantee compliance with national and international standards and laws.	Documentation of visits, notification of suppliers of FWF membership; posting of worker information sheets, completed questionnaires.	1	2	0

Comment: Uniform Brands visits its suppliers in Hungary and Portugal regularly. The Code of Labour Practices is posted and the questionnaire completed.

Recommendation: FWF recommends Uniform Brands to conduct monitoring activities beyond the minimum requirements for low risk production locations, for instance by collecting existing audit reports or conduct a wage analysis.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.10 Extra bonus indicator: in case FWF member company conducts full audits above the minimum required monitoring threshold.	None	FWF encourages all of its members to audit/monitor 100% of its production locations and rewards those members who conduct full audits above the minimum required monitoring threshold.	Production location information as provided to FWF and recent Audit Reports.	N/A	3	0

Comment: Uniform Brands has audited 93% of its supply base, but did not conduct full audits at suppliers in China and Bangladesh which were not part of its tail end. Therefore, the indicator is rated N/A.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.11 Questionnaire is sent and information is collected from external brands resold by the member company.	No	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	2	0

Comment: Uniform Brands buys a small amount of its production from another company of the same holding, with whom it closely cooperates. It is aware of the production locations and social compliance programme of this producer.

It also sources products from another external brand. Uniform Brands did not send the questionnaire for external producers to them.

Requirement: Uniform Brands needs to send the FWF questionnaire for external production to the brand it resells.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.12 External brands resold by member companies that are members of another credible initiative (% of external sales volume).	79%	FWF believes members who resell products should be rewarded for choosing to sell external brands who also take their supply chain responsibilities seriously and are open about in which countries they produce goods.	External production data in FWF's information management system. Documentation of sales volumes of products made by FWF or FLA members.	3	3	0

Comment: One of the external brands was a member of FLA in 2016.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.13 Questionnaire is sent and information is collected from licensees.	No licensees	FWF believes it is important for member companies to know if the licensee is committed to the implementation of the same labour standards and has a monitoring system in place.	Questionnaires are on file. Contracts with licensees.	N/A	1	0

MONITORING AND REMEDIATION

Possible Points: 32

Earned Points: 11

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 Head of Finance is responsible for handling worker complaints.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.2 System is in place 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 production location visits, etc.	0	2	0

Comment: Uniform Brands checks through visits and FWF audits whether the FWF CoLP is posted. Uniform Brands could show that the Worker Information Sheet is posted in the factories in Hungary and Portugal. For several of its Chinese and Bangladeshi suppliers, the brand could not show through pictures or visit reports that the FWF CoLP was posted.

Requirement: Uniform Brands 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. Uniform Brands should check by means of a visit or by submitting a photo whether the Worker Information Sheet is posted in the factories.

Recommendation: FWF strongly recommends Uniform brands to ensure that the most recent Worker Information Sheet is posted in the factories.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.3 Percentage of FWF-audited production locations where at least half of workers are aware of the FWF worker helpline.	25%	The FWF complaints procedure is a crucial element of verification. If production location 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. Production location participation in the Workplace Education Programme also count towards this indicator.	Percentage of audited production locations where at least 50% of interviewed workers indicate awareness of the FWF complaints mechanism + percentage of production locations in WEP programme.	2	4	0

Comment: Three active Tunisian suppliers were FWF-audited in the last three years. A WEP-basic took place at its main Tunisian supplier. Workers at the two subcontractors were not yet aware of the FWF CoLP and FWF worker helpline.

Recommendation: Uniform Brands 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, The brand can use the worker information cards available for download on FWF's website.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.4 All complaints received from production location 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. Member company involvement is often essential to resolving issues.	Documentation that member company has completed all required steps in the complaints handling process.	N/A	6	-2

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.5 Cooperation with other customers in addressing worker complaints at shared suppliers	No complaints or cooperation not possible / necessary	Because most production locations supply several customers with products, involvement of other customers by the FWF member company 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	0

COMPLAINTS HANDLING

Possible Points: 7

Earned Points: 3

4. TRAINING AND CAPACITY BUILDING

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.1 All staff at member company are made aware of FWF membership.	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: Uniform Brand informs its staff about FWF. Staff can access FWF material, audit reports and CAPs. Uniform Brands has regular discussions with responsible staff on FWF requirements and the outcome of the Brand Performance Check. It has trained its sales staff to communicate about FWF membership.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.2 All staff in direct contact with suppliers are informed of FWF requirements.	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	-1

Comment: The Head of Finance participated in the FWF Annual Conference. Staff in direct contact with suppliers are generally well informed of FWF requirements.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices.	Member does not use agents/contractors	Agents have the potential to either support or disrupt CoLP implementation. It is the responsibility of member company to ensure agents actively support the implementation of the CoLP.	Correspondence with agents, trainings for agents, FWF audit findings.	N/A	2	0

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.4 Production location participation in Workplace Education Programme (where WEP is offered; by production volume)	70%	Lack of knowledge and skills on best practices related to labour standards is a common issue in production locations. Good quality training of workers and managers is a key step towards sustainable improvements.	Documentation of relevant trainings; participation in Workplace Education Programme.	6	6	0

Comment: A WEP-basic training session was held at its main Tunisian supplier in 2016. Workers from other suppliers were not yet trained.

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. FWF currently offers the following training modules for the WEP: Basic, Communication, Gender Based Violence, Supervisor and the Factory Guide. More info on availability in countries can be found on the FWF website. Uniform Brands should motivate its supplier(s) to join WEP training, especially when Uniform Brands resumes production in Bangladesh.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.5 Production location 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, member companies 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

TRAINING AND CAPACITY BUILDING

Possible Points: 9

Earned Points: 9

5. INFORMATION MANAGEMENT

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

Comment: Uniform Brands is well aware of all its production locations in Tunisia. It has included these suppliers in its monitoring system. Uniform Brands is not involved in the decision-making process about placing orders at subcontractors when production capacity is needed. Uniform Brands is informed after production took place.

The brand sourced a very small amount of orders from Bangladeshi and Chinese suppliers, limiting the ability of these suppliers to outsource production. At the Bangladeshi supplier, the brand also knows the subcontractor.

Recommendation: FWF strongly encourages Uniform Brands to further integrate planning with the satellite production locations. It should put a strategy in place towards its subcontractors to maintain stable business relationships and work on improving working conditions.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
5.2 CSR and other relevant staff actively share information with each other about working conditions at production locations.	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: Staff can access FWF material, audit reports and CAPs. Uniform Brands has regular discussions with responsible staff on FWF requirements and follow up on audits.

Recommendation: It is advised to make relevant staff aware of the available tools FWF offers, such as the Health and Safety guides, monitoring CAP documents, access to FWF's online information system. Purchasing staff is recommended to share reports from factory visits that include a status update of implementing the CoLP.

INFORMATION MANAGEMENT

Possible Points: 7

Earned Points: 7

6. TRANSPARENCY

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
6.1 Degree of member company compliance with FWF Communications Policy.	Minimum communications requirements are met AND no significant problems found	FWF's communications policy exists to ensure transparency for consumers and stakeholders, and to ensure that member communications about FWF are accurate. Members will be held accountable for their own communications as well as the communications behaviour of 3rd-party retailers, resellers and customers.	FWF membership is communicated on member's website; other communications in line with FWF communications policy.	2	2	-3

Comment: Uniform Brands communicates about Fair Wear Foundation on its website, to customers and in tenders. It adheres to the FWF Communication Policy.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
6.2 Member company engages in advanced reporting activities	Published Performance Checks, Audits, and other efforts lead to increased transparency	Good reporting by members helps to ensure the transparency of FWF's work and shares best practices with the industry.	Member company publishes one or more of the following on their website: Brand Performance Check, Audit Reports, Supplier List.	1	2	0

Comment: Uniform Brands published the previous Brand Performance Check reports online.

Recommendation: FWF recommends Uniform Brands to publish supplier information, like audit reports online. Good reporting by members helps to ensure the transparency of Uniform Brand's and FWF's work.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
6.3 Social Report is submitted to FWF and is published on member company's website	Complete and accurate report published on member's website	The social report is an important tool for members to transparently share their efforts with stakeholders. Member companies should not make any claims in their social report that do not correspond with FWF's communication policy.	Social report that is in line with FWF's communication policy.	2	2	-1

Comment: Uniform Brands submitted its social report to FWF and posted it online.

TRANSPARENCY

Possible Points: 6

Earned Points: 5

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: Uniform Brands holds annual evaluations of FWF membership with top management. Furthermore, top management discuss outcomes of the Brand Performance Check to ensure progress is made.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
7.2 Level of action/progress made on required changes from previous Brand Performance Check implemented by member company.	40%	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.	Member company should show documentation related to the specific requirements made in the previous Brand Performance Check.	2	4	-2

Comment: Five requirements were included in the last Brand Performance Check report. By providing the WEP-basic training to its main Tunisian supplier, Uniform Brands fulfilled requirements concerning training (4.4) and raising awareness on the FWF worker helpline (3.3).

It did not yet actively follow up on legal minimum wages (1.9), living wages (1.11) and ensuring that the Worker Information Sheet is posted (3.2).

EVALUATION

Possible Points: 6

Earned Points: 4

RECOMMENDATIONS TO FWF

Uniform Brands had no recommendations for FWF.

SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	18	38
Monitoring and Remediation	11	32
Complaints Handling	3	7
Training and Capacity Building	9	9
Information Management	7	7
Transparency	5	6
Evaluation	4	6
Totals:	57	105

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

54

PERFORMANCE BENCHMARKING CATEGORY

Good

BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

13-06-2017

Conducted by:

Wilco van Bokhorst

Interviews with:

Mr. Rob van Wijnhoven - CEO

Mr. Ruud Wissink, Director Finance, IT & Logistics

Mr. Guido Isselman, Marketing Manager

Mr. Peter Goejer, Director Sourcing