



BRAND PERFORMANCE CHECK

Bel-confect NV

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this report covers the evaluation period 01-07-2016 to 30-06-2017

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

Bel-confect NV

Evaluation Period: 01-07-2016 to 30-06-2017

MEMBER COMPANY INFORMATION	
Headquarters:	Dottenijs, Belgium
Member since:	01-06-2016
Product types:	Workwear
Production in countries where FWF is active:	Bangladesh, China, Tunisia, Turkey
Production in other countries:	Albania, Belgium, Hungary, Pakistan, 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	15%
Benchmarking score	21
Category	Needs Improvement

Summary:

Bel-Confect has shown insufficient progress in meeting performance requirements. This is reflected in the benchmark score of 21. Also, the monitoring percentage of 15% is below the 40% required of brands in their first year of membership. In light of these findings, FWF has placed Bel-Confect in the needs improvement category.

Bel-Confect became a member of FWF in 2016, based on a desire to be a socially and environmentally-responsible company and the understanding that social and environmental compliance is key for survival. The company became FWF's first Belgian workwear brand. In this first year of membership, Bel-Confect has had little time to dedicate to FWF membership. Bel-Confect's monitoring percentage is low and it failed to engage in remediation. To stay a FWF member the company knows it needs to dedicate time to internalise FWF procedures and requirements and systematically include them in company structure and policies.

To achieve a Good rating, FWF recommends Bel-Confect to dedicate sufficient resources (human and financial) to understanding and addressing CoLP risks at production locations during the coming year. Bel-Confect should go beyond its agents alone and fully map its supply chain, learn more about labour conditions in its production countries, monitor/audit the suppliers and work towards a systematised way of following up on CoLP violations.

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.	37%	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.	2	4	0

Comment: Bel-Confect owners own a distribution center in Tunisia. Orders for all woven garments are managed through this distribution center. CMT factories are selected and a partnership with the center is established. Staff is in daily contact with factories regarding planning, quality etc. The production of these CMT factories predominantly goes to Bel-Confect; the company has significant leverage in those Tunisian factories. Fabrics are shipped to the center weekly and every week a container returns to Belgium with finished garments. The Belgian production manager visits the distribution center every month, and the related factories regularly.

Recommendation: New products sometimes require small orders with new suppliers, but can also lead to more orders from present suppliers. We recommend to include in the decision-making process regarding product development the possibility to source the product at current production locations.

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.	3.5%	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: A large part of Bel-Confect's production is for repeat customers with whom the company has multiple year contracts. That enables Bel-Confect to commit to their suppliers and establish a relatively stable production flow.

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.	40%	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.	2	4	0

Comment: Bel-Confect strives to build long-lasting relationships. In Tunisia this is done with suppliers through the distribution center. In other countries the relationship is established with an agent. Bel-Confect has a Dutch speaking agent in China, Bangladesh and Turkey.

Requirement: Bel-Confect is not sufficiently aware of which suppliers are being subcontracted by agents and/or main suppliers. The company needs to fully map its supply chain and consciously decide on with which factory they want to work with.

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: Bel-Confect sent the questionnaire to all their production locations. Over half of the suppliers returned a signed questionnaire, others did not.

Requirement: Bel-Confect needs to ensure that new suppliers sign and return the questionnaire before first orders are placed, and should contact the suppliers that report non-compliance with one of the 8 CoLP.

Recommendation: It is important to engage in conversations with the supplier on why a questionnaire is sent, and why compliance with the CoLP is required. These conversations help the company understand conditions in their production countries, and their role in compliance with the CoLP. Bel-Confect should establish an internal system that facilitates follow-up of filled in questionnaires from suppliers.

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.	Insufficient	Due diligence helps to identify, prevent and mitigate potential human rights problems at new suppliers.	Documentation may include pre-audits, existing audits, other types of risk assessments.	0	4	0

Comment: Bel-Confect visits their Tunisian production locations regularly and has a good understanding of what is going on in the factories there. Factory visit reports are written by the production manager, but not on all CoLP information is included. However, suppliers in other countries are not regularly visited and audits are rarely conducted. The company relies on the information of agents to assess factory conditions.

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 Bel-Confect to assess the risks associated with operating in specific production areas. 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. Including standardised elements in the factory visit report that inform about the labour conditions facilitates due diligence and follow-up.

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.	No	A systemic approach is required to integrate social compliance into normal business processes, and supports good decisionmaking.	Documentation of systemic approach: rating systems, checklists, databases, etc.	0	2	0

Comment: Whether or not a production location is complying with the CoLP is determined during a visit of the production manager. She has a checklist that includes CoLP issues. Bel-Confect states it would exit a factory if they do not comply with the CoLP.

Requirement: A systematic approach is required to integrate social compliance into normal business processes, and supports good decision-making. The approach needs to ensure that the member consistently evaluates the entire supplier base and includes information into decision-making procedures. Overall, FWF strongly feels that a company should not simply stop producing at a certain location when violations with the CoLP are detected, instead the member brand should work together with the supplier to address the violations and come to improvements. Only in case this is not possible an exit is desired, and a responsible exit strategy needs to be followed. This is especially important where member production is a significant part of total factory production. This can take the form of a timely announcement of production decisions, a gradual decrease in orders, etc.

Recommendation: Bel-Confect is encouraged to include compliance with CoLP as (an) indicator(s) in its supplier rating system besides evaluating suppliers on quality, relationship, price and planning.

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: Lead times are not fixed when discussing a new order with a (possible) supplier. Bel-Confect asks a supplier what a reasonable lead time would be and communicates this back to the client. When a client wants an order urgently done Bel-Confect would discuss production capacity with the supplier and, when needed, switch orders to accommodate the supplier. In general the production flow is steady during the year, production peaks are rare since products are not seasonal and Bel-Confect has many multiple year contracts with repeat customers, which facilitates production planning. Suppliers are kept up to date, principally in Tunisia where this happens daily through their own distribution center.

Recommendation: The earlier a planning can be communicated, the better this can be planned. Investigate when you can communicate the production planning to all suppliers, not only in Tunisia, and how this can be done in a systematic manner.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.7 Degree to which member company mitigates root causes of excessive overtime.	Insufficient efforts	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.	0	6	0

Comment: While Bel-Confect's production is not mandated by short lead times the production of others in the factories they source might. Audit results show excessive overtime at the company's suppliers. Bel-Confect is yet to have conversations on this with their suppliers.

Requirement: Besides preventing excessive overtime it is also important to actively address this and to respond to this when audit results show non-compliance at factory level. Bel-Confect should investigate to what extent its current buying practices has an effect on the working hours at supplier level. A root cause analysis of excessive overtime should be done to investigate which steps can be most effective to reduce overtime. The company should discuss the causes of excessive overtime with factory management and provide support to manage it.

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.	No policy in place	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.	0	4	0

Comment: Price is indicated by the supplier first and is not the most important factor in the negotiation. Quality and responsiveness to questions/demands (the relationship with a supplier) is leading. However, Bel-Confect does not know what makes up the price. The labour costs of garments is unknown to them. Only in Tunisia where the company buys the fabrics and has a general idea on labour and housing costs they could estimate both and relate this to the price.

Requirement: Bel-Confect needs to develop a pricing policy where the company knows the labour cost of garments and which allows the payment of at least legal minimum wages in production countries.

Recommendation: At a minimum, member companies are 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.

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 data available	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.	N/A	2	-2

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: Bel-Confect usually pays a large amount (at least 50%) when placing the order to accommodate the supplier.

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.	No efforts shown.	Sustained progress towards living wages requires adjustments to member companies' policies.	Documentation of policy assessments and/or concrete progress towards living wages.	0	8	0

Comment: Bel-Confect does not discuss wages with the supplier.

Requirement: Bel-Confect 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.

Recommendation: To come to a living wage it is important to first know how much time is spent on manufacturing your product and what the labour minute cost is. The FWF labour costing minute tool can be of help here.

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

PURCHASING PRACTICES

Possible Points: 42

Earned Points: 9

2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	15%	
% of production volume where monitoring requirements for low-risk countries are fulfilled	0%	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	FWF members must meet tail-end monitoring requirements. Implementation will be assessed during next Brand Performance check.
Total of own production under monitoring	15%	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 follow up of identified problems lies with the person who is also in charge of IT, HR and finance. Little time is left to dedicate time to this.

Recommendation: Bel-Confect should designate a person with sufficient capacity and resources to follow up on problems identified by the monitoring system. Since the production manager and the project manager are already often in contact with production locations it would be an idea to include the follow up in their workload.

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: The audit reports and CAPs were shared with the production locations, but no follow up took place to establish improvement timelines and follow up on them.

Requirement: Bel-Confect 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 timeframe for realising improvements.

Recommendation: The follow up of a CAP is a shared responsibility between a member brand and the audited factory. The brand should engage in a conversation with the supplier to see how they can accommodate improvements with, for example, their sourcing strategy or through financial support.

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.	Insufficient	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.	-2	8	-2

Comment: Belgian staff is in contact with suppliers on a weekly basis, but the follow up of CoLP related issues is not integrated in these contact moments.

Requirement: Resolving and remediating non-compliances is one of the most important criteria FWF Member companies can do towards improving working conditions. FWF expects Bel-Confect to examine and support remediation of any problem that they encounter. Coordinated efforts between different departments are required to ensure sustained responses to CAPs.

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.	45%	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.	2	4	0

Comment: The Tunisian suppliers are visited on a regular basis; the production manager visits Tunisia every month. Other factories are not systematically visited. Contact is often indirect: the Dutch speaking agent that maintains contact with the factories visits the Belgian HQ or they meet at a trade fair.

Requirement: Besides visiting factories in so-called “high risk” countries, it is also important to visit the suppliers in “low risk” countries like Portugal and Hungary once a year to inform yourself of what is going on in the factory. Visits help build trust and partnership with a supplier and contact through an agent is insufficient to do so and to verify improvements of CoLP in a factory.

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: The returned supplier questionnaires indicate in several cases that previous audit reports are available and the factory is willing to share. Bel-Confect however did not ask to receive them.

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.

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: Bel-Confect has not followed a due diligence procedure and is not aware of risk policies for special risk areas as exist in Bangladesh and Turkey.

Requirement: Bel-Confect's monitoring system should identify and address high risk issues that are specific to the company's sourcing practices. FWF provides policies and country-specific requirements. Priorities in remediation efforts are guided by these policies.

Recommendation: Knowing the country specific risks facilitates the starting point for discussing this with suppliers. Bel-Confect can agree on additional commitments that are required to mitigate risks. The company can provide additional measures for support and integrate that in the monitoring system. For instance: lack of knowledge of factory managers in Bangladesh on the principles of fire safety, means organizing management seminars.

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 cooperation	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.	-1	2	-1

Comment: Another FWF member brand sought contact with the company to jointly resolve corrective actions at a shared supplier. However, Bel-Confect did not follow up on this yet.

Recommendation: Cooperation among FWF members is required. In addition, it is advised to identify other clients and their commitment to improving working conditions. Involving more costumers of the factory increases leverage, the chances of successful outcomes and long term improvements.

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.	0-49%	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.	0	2	0

Comment: The questionnaire has been sent, but visits occur irregularly and the company did not check if the Worker Information Sheet was posted in the factory.

Requirement: All production sites in low-risk countries must:

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

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.	Not applicable	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

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.	Yes	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.	1	2	0

Comment: A small part of Bel-Confect's garment production comes from external brands. Their shoe-wear however is mostly externally produced (and a considerable contributor to the company profit). After a GRI course the shoe brands were contacted to find out whether they were endorsing ILO standards.

Requirement: FWF member companies should send the FWF questionnaire for external production to the brand(s) it resells. Especially for the company's shoe-wear line it is important as a conversation starter.

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).	13%	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.	1	3	0

Comment: Bel-Confect is unaware of the social policies of the external brands the company resells. Up til now CSR policy has not been a selection criteria for deciding on reselling an external brand.

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

Recommendation: When selecting a new brand Bel-Confect should inform itself on what the brand's CSR policy is and whether the brand is connected to a known initiative related to social and labour conditions. Within existing relationships the company should open up the conversation about labour conditions.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.13 Questionnaire is sent and information is collected from licensees.	No	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.	0	1	0

Comment: Bel-Confect has hundreds of resellers in the form of small hardware stores that fall under a larger umbrella organisation.

Requirement: Bel-Confect must send the questionnaire to the umbrella organisations to collect the necessary information, and open up the conversation with them to reach all resellers.

Recommendation: Bel-Confect can think of aggregated ways to inform the many resellers, e.g. through a newsletter or bulletin.

MONITORING AND REMEDIATION

Possible Points: 35

Earned Points: 0

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 follow up of identified problems lies with the person who is also in charge of IT, HR and finance. Little time is left to dedicate to this.

Recommendation: Assess whether the current dedicated employee has sufficient time to deal with a complaint when this comes in.

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: A factory is asked to send a picture jointly with the filled in questionnaire. There is no follow up when this does not happen.

Requirement: The member company 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. Member company should check by means of a visit whether the Worker Information Sheet is posted in the factories.

Recommendation: It is suggested to ask production locations to submit a photo of the posted Worker Information Sheet with the annual questionnaire and to ask the production manager visiting a supplier to check if the documents are still posted as indicated on the obtained photo.

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.	0%	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.	1	4	0

Comment: In audited factories workers were unaware of the FWF worker helpline.

Requirement: Bel-Confect should inform the factory managers about the existence of the hotline. The company should have a routine to ensure the worker information sheet with complaints handlers contact details is posted in a place freely accessible to workers. The information sheet is the first step towards awareness raising about the existence and functioning of FWF's worker hotline.

Recommendation: Bel-Confect 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 company 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: 2

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: Staff members are informed in staff meetings, through company newsletter and in company publications.

Recommendation: Think together with staff members how their daily work contributes to reinforcement of CoLP, and what they can do to strengthen FWF membership and improve conditions in the garment factories. Also, it is advised to develop a standard procedure for all new employees to get familiar with FWF membership. FWF has material available that can be used to inform (sales) staff.

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: A summary of what FWF membership entails was sent to all staff members.

Requirement: Sourcing and purchasing staff at a minimum should possess the knowledge necessary to implement FWF requirements. The summary should be translated to how requirements can be integrated into the daily work of the the production manager and the project manager.

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.	Yes	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.	1	2	0

Comment: Communication about FWF membership has mainly taken place with agents, who are sometimes (co-)owners of the production location(s). The questionnaires were sent to the agents to fill in, as well as available audit reports and CAPs to follow-up.

Requirement: Bel-Confect needs to ensure agents are aware of FWF requirements and actively support the implementation of the CoLP. However, agents cannot be the replacement of direct contact with the production locations. The use of agents increases risk since a step is built in between the supplier and the brand.

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)	0%	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.	0	6	0

Comment: Bel-Confect did not facilitate WEP trainings at their production sites.

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. Bel-Confect should motivate its main supplier(s) to join WEP trainings.

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)	0%	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.	0	4	0

Comment: Bel-Confect did not facilitate trainings at their production sites.

Recommendation: All factory workers and management should be informed about FWF, labour standards and grievance mechanisms. In order to further communication between employers and workers in the workplace FWF recommends Bel-Confect to ensure suppliers participate in trainings. Trainings must meet FWF quality standards to receive credit for this indicator: top management, supervisors and workers should be included in the trainings, separately. Workplace standards and dispute handling should be included in the training. At least 10-20% of the workforce must be trained, depending on the size of the factory. Worker participation should be balanced and representative.

FWF has developed the Factory Guide, an innovative and comprehensive e-learning tool to increase awareness of factory managers on FWF requirements and labour standards. This tool specifically provides FWF member companies the opportunity to increase awareness of managers in countries where FWF does not offer the WEP modules. FWF recommends Bel-Confect to ensure suppliers actively use the Factory Guide.

TRAINING AND CAPACITY BUILDING

Possible Points: 15

Earned Points: 4

5. INFORMATION MANAGEMENT

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

Comment: Bel-Confect has an updated list of suppliers. Outside Tunisia the company relies on agents to choose production sites.

Requirement: Subcontractors that are mentioned in audit reports and by suppliers in returned questionnaires should be included in the database. Also, relying on the agent's information is not sufficient to make sure all production sites are identified. Visits to production sites are required. After the end of each financial year, member companies must confirm their list of suppliers and provide relevant financial data.

Recommendation: Bel-Confect is advised to develop a systematic approach to complete the supplier list. Part of the approach can be:

1. Automatically include information from audit reports and complaints;
2. Business relationships with agents include transparency of production locations;
3. Agreements with factories on the use of subcontractors stating clearly that when subcontractors are used, they are included in the monitoring system and information is shared on the subcontracted production process.

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: The production manager shares her mission reports internally.

Requirement: 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: 4

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: A brief statement on FWF membership is included in publication materials and on the company website.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
6.2 Member company engages in advanced reporting activities	No	Good reporting by members helps to ensure the transparency of FWF's work and shares best practices with the industry.	Member company publishes one or more of the following on their website: Brand Performance Check, Audit Reports, Supplier List.	0	2	0

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

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	For new member companies	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.	N/A	2	-1

TRANSPARENCY

Possible Points: 4

Earned Points: 2

7. EVALUATION

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

Comment: Management recognizes the importance of working on improving CoLP on production sites. The management also recognizes that in the past year they did not have sufficient time to dedicate to FWF membership and that improvement is needed to stay a FWF member. A CSR consultant is contacted to help establish procedures within the organisation that systematically include FWF practices in company policies.

Recommendation: FWF advises to organise a meeting with management and sourcing staff to discuss the outcomes of this performance check and use those to formulate future plans.

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

EVALUATION

Possible Points: 2

Earned Points: 2

RECOMMENDATIONS TO FWF

Bel-Confect would appreciate it if FWF publications/materials would be available in Dutch or French.

SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	9	42
Monitoring and Remediation	0	35
Complaints Handling	2	7
Training and Capacity Building	4	15
Information Management	4	7
Transparency	2	4
Evaluation	2	2
Totals:	23	112

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

21

PERFORMANCE BENCHMARKING CATEGORY

Needs Improvement

BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

07-11-2017

Conducted by:

Sharon Hesp

Interviews with:

Veronique Deriemaker - Finance, IT, HR

Mieke De Kerpel - Production Manager

Katrien van Wallegghem - Project Manager

Filip Lietaer - Marketing Director / CEO

Catherine Bourghelle - Purchase Footwear