



BRAND PERFORMANCE CHECK

Uniform Brands

this report covers the evaluation period 01-01-2017 to 31-12-2017

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

Uniform Brands

Evaluation Period: 01-01-2017 to 31-12-2017

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	56
Category	Good

Summary:

Uniform Brands B.V. has met most of FWF's performance requirements in 2017. With a monitoring percentage of 93%, Uniform Brands meets the required monitoring threshold for members after three years of membership. With a score of 56 points, Uniform Brands falls in the 'good' category.

Uniform Brands' main production facility is in Tunisia, with two satellite production locations in the region to support its production. A considerable amount also comes from factories in low-risk countries Hungary and Portugal. In 2017, it sourced small production volumes from four Chinese suppliers and two Bangladeshi suppliers. Uniform Brands has long-term relationships with most of these suppliers.

In 2017, Uniform Brands followed up the 2016 audit results of its Tunisian suppliers. Progress was made on several issues, although a lack of funds limits the progress that can be made by the suppliers. Therefore, FWF recommends Uniform Brands to consider in what ways it could support its suppliers, for example by placing more orders.

For several years, Uniform Brands remained at the same score level of the Brand Performance Check without making significant improvements compared to previous years. FWF has required Uniform Brands to follow up on several issues, what did not result in sufficient progress. FWF therefore urges Uniform Brands to follow up more actively on the requirements included in the Brand Performance Check reports.

FWF required Uniform Brands to ensure that a system of proper documentation is in place, especially when it comes to sending out and receiving FWF questionnaires and checking whether the FWF CoLP is posted. Uniform Brands needs to systematise this as the brand should make clear from the start of the relationship with the factory that labour standards are an integral part of that relationship.

Despite the fact that Uniform Brands has only very small production at two Bangladeshi suppliers and has had plans to stop sourcing from these suppliers, the brand continued to source from these suppliers for several years now. During those years, Uniform Brands did not comply with the FWF Enhanced Monitoring Programme for Bangladesh. Although it did receive a BSCI-audit report for one supplier in 2016 and the brand is aware that the other factory is a member of the Accord, still Uniform Brands took no steps to assess, mitigate and remediate any health and safety issues. FWF requires Uniform Brands to comply with the Enhanced Monitoring Programme. At a minimum, Uniform Brands needs to obtain audit reports that include detailed checks on health and safety.

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.	92%	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 two Tunisian satellite locations to support its main production facility. It has another supplier in Hungary. Leverage at its Tunisian and Hungarian partners is between 40%-100%. Furthermore, Uniform Brands sources from factories in China and Bangladesh where it only has low leverage (

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

Recommendation: FWF recommends Uniform Brands to consolidate its supply base by limiting the number of suppliers in its 'tail end'. To achieve this, members should determine whether suppliers where they buy less than 2% of their FOB are of strategic relevance. Shortening the tail will reduce the social compliance risks the member is exposed to and will allow the member to improve working conditions in a more efficient and effective way.

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.	87%	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.

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 did not follow up on last years' requirement to ensure that a Chinese subcontractor signed the FWF Code of Labour Practices.

Requirement: Uniform Brands needs to ensure that all its suppliers have signed and returned the questionnaire before 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 suppliers.	Documentation may include pre-audits, existing audits, other types of risk assessments.	2	4	0

Comment: In recent years, Uniform Brands did not start a new cooperation with a supplier. In case a new supplier is selected, due diligence is conducted by visiting the supplier and discussing labour standards. Uniform Brands is aware of high risks in countries like Tunisia, China and Bangladesh. Both a country risk assessment and the evaluation of audit reports is not yet done in a systematic manner.

Recommendation: 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 discusses audit results once a year. Progress made by the satellite production locations is registered in visit reports.

About 7% of production takes place in China and Bangladesh. 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.”

Requirement: 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.

In 2017, it also placed some production at production locations in China and Bangladesh. Uniform Brands does not discuss planning with these suppliers, but the brand asks for a delivery date which is often between 14-16 weeks and offers 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 Tunisian 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: Excessive overtime was found during a FWF-audit at a Chinese supplier that it shares with two other FWF members. Uniform Brands spends less than 2% of its FOB at the supplier and would stop production at the supplier. Therefore, Uniform Brands did not participate in the audit and did not actively participate to mitigate excessive overtime.

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 at all its Chinese and Bangladeshi suppliers, for example by collecting existing audit reports and following up on working hours.

Recommendation: Uniform Brands should ensure that it learns more about possible excessive overtime at its Bangladeshi and Chinese suppliers. 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, but not of the cost per labour minute. 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. Together with its Tunisian supplier and subcontractor, it should increase price transparency by calculating the cost per labour minute and compare that to the wage levels in the CBA.

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

Comment: Non-payment of the legal minimum wage for some workers was found during a FWF-audit at a Chinese supplier that it shares with two other FWF members. Uniform Brands spends less than 2% of its FOB at the supplier and would stop at the supplier. Therefore, Uniform Brands did not participate in the audit and did not actively participate to mitigate non-payment of the legal minimum wage.

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.

Recommendation: 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.

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

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 has discussed living wages with its Tunisian suppliers, but did not take additional steps to set targets to come to a living wage.

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. 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.

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: 36

Earned Points: 20

2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	74%	
% of production volume where monitoring requirements for low-risk countries are fulfilled	19%	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	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.	N/A	2	-1

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: Uniform Brands followed up on the audit reports by visiting the supplier and discussing the outcomes with them. It keeps track of the progress made by the supplier through visit reports.

Its main Tunisian supplier has set up an improvement plan, including the necessary costs and timelines when it comes to health and safety. Due to a lack of funds, the supplier was not able to make the improvements. Uniform Brands also discussed several improvements with the Tunisian subcontractors. Non-payment of social security remains a serious issue due to a lack of funds and orders.

The brand has not verified whether the improvements were actually realized by means of checking documentation, a monitoring visit by an independent expert or an audit.

Uniform Brands did not actively follow up on issues at its Bangladeshi and Chinese suppliers, due to very few orders and limited leverage.

The brand partially fulfilled last years' requirement as it did put in more effort to discuss the outcomes of the audits with its suppliers, but failed to set up a system to track and verify the improvements made.

Requirement: Uniform Brands 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: FWF strongly recommends Uniform Brands to collect existing audit reports from its Chinese and Bangladeshi suppliers and actively follow up on it.

Furthermore, FWF recommends Uniform Brands to look for ways to support the Tunisian factories in their remediation plans, for example by offering financial support and by working together with other brands.

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 its Tunisian production locations.

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: Uniform Brands did not collect existing audit reports.

Recommendation: FWF strongly recommends Uniform Brands to ensure that it is aware of risks at its Chinese and Bangladeshi suppliers by collecting existing audit reports, assessing its quality and provide follow up.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.7 Compliance with FWF risk policies.	Average score depending on the number of applicable policies and results	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.	1	6	0
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
Compliance with FWF guidance on risks related to Turkish garment factories employing Syrian refugees	Policies are not relevant to the company's supply chain			N/A	6	-2
Other risks specific to the member's supply chain are addressed by its monitoring system	Intermediate			3	6	-2

Comment: Uniform Brands sources from two Bangladeshi suppliers. Despite the fact that it accounts for less than 2% of its FOB, FWF still requires members to ensure that it complies with the enhanced monitoring programme. Uniform Brands did not follow up on a 2016 BSCI-audit report or take any other measure to mitigate the health and safety risks. One of the factories is a member of the Bangladesh Accord, but Uniform Brands did not check whether the factory is progressing.

In general, Uniform Brands is aware of risks in China, Bangladesh and Tunisia but does not assess these risks in a systematic manner nor does it actively follow up on these risks in China and Bangladesh.

Requirement: Uniform Brands needs to ensure 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.

Furthermore, the brand needs to check the health and safety situation in the factories by collecting audit reports of credible organisations such as the Accord or Alliance or should hire an independent auditing company to assess the health and safety situation. Furthermore, the brand should actively follow up on the reports.

Recommendation: FWF recommends Uniform Brands to set up a system to continuously assess country risks and integrate that into its decision-making process and due diligence at suppliers.

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

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.”

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

Comment: Uniform Brands does not fulfill tail end requirements. Therefore, this indicator is not applicable.

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.

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).	0%	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.	0	3	0

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: 30

Earned Points: 12

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: During the Brand Performance Check, Uniform Brands was not able to show that the FWF Code of Labour Practices was posted in Chinese and Bangladeshi factories.

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 whether the 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.	40%	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 Tunisian suppliers were FWF-audited in the last three years. A WEP-basic took place at its main Tunisian supplier and at a Bangladeshi subcontractor. 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: Once a year, staff is updated on the Brand Performance Check outcomes and all FWF activities, actions and plans.

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 is 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 and a Bangaldeshi subcontractor. 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 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)	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	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: Uniform Brands is generally well aware of all its production locations. Several FWF-audit reports state that the factories are not using subcontractors. At one Bangladeshi subcontractor, the factory uses homeworkers. According to Uniform Brands, the main Bangladeshi supplier checked whether orders of Uniform Brands were actually produced at this location.

Recommendation: FWF recommends Uniform Brands to set up a system to ensure that it can prevent and verify that products in Bangladesh are not outsourced.

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.

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: 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 publishes the Brand Performance Check report on its website.

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 published the social report on its website.

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 discusses 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.	20%	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: In the last Brand Performance Check, 7 requirements were given. (1.3, 1.9, 1.11, 2.3, 2.4, 2.11, 3.2)

Indicators 1.9 and 2.3 were no longer applicable. The brand partially fulfilled the requirement of 2.4 by following up more actively on audit results. The brand insufficiently followed up on all the other requirements.

Requirement: Uniform Brands needs to ensure that it follows up on all requirements.

EVALUATION

Possible Points: 6

Earned Points: 4

RECOMMENDATIONS TO FWF

Uniform Brands did not have any recommendations for FWF.

SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	20	36
Monitoring and Remediation	12	30
Complaints Handling	3	7
Training and Capacity Building	9	9
Information Management	4	7
Transparency	5	6
Evaluation	4	6
Totals:	57	101

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

56

PERFORMANCE BENCHMARKING CATEGORY

Good

BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

29-05-2018

Conducted by:

Wilco van Bokhorst

Interviews with:

Ruud Wissink, Director Finance, IT & Logistics

Guido Isselman, Marketing Manager

Peter Goejer, Director Sourcing