



BRAND PERFORMANCE CHECK

Bel&Bo-Fabrimode NV

PUBLICATION DATE: JULY 2018

this report covers the evaluation period 01-02-2017 to 31-01-2018

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&Bo-Fabrimode NV

Evaluation Period: 01-02-2017 to 31-01-2018

MEMBER COMPANY INFORMATION	
Headquarters:	Deerlijk, Belgium
Member since:	01-12-2014
Product types:	Fashion
Production in countries where FWF is active:	Bangladesh, Bulgaria, China, India, Indonesia, Macedonia, Republic of, Romania, Tunisia, Turkey, Viet Nam
Production in other countries:	Albania, Bosnia and Herzegovina, Egypt, France, Greece, Hong Kong, Italy, Malaysia, Morocco, Pakistan, Poland, Sri Lanka, Taiwan, Ukraine
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	80%
Benchmarking score	59
Category	Good

Summary:

Bel&Bo has shown progress and met most of FWF's performance requirements for its third year of membership. The company reached a monitoring threshold of 80% in 2017 and remains in the good category with a score of 59. Bel&Bo developed a systematic approach to monitor the production units with consistent use of the FWF audit quality assessment tool. The remediation process is organised in a structured way with the formulation of specific and detailed Corrective Action Plans for the production locations, visits that include more general and in-depth discussions about progress and adequate follow-up of complaints. For the 2017 financial year, 27% of FOB was monitored through FWF audits, while 50% of production was monitored through third-party audits that meet FWF quality requirements. Bel&Bo has a consolidation strategy with the specific formulated target for the 'tail end' to have 100 fewer production units in 2018 compared to the start of the Bel&Bo FWF membership in 2014.

FWF encourages Bel&Bo to consolidate its supply base by limiting the number of suppliers in its tail end, which will allow Bel&Bo to improve working conditions in a more efficient and effective way. FWF recommends Bel&Bo to further develop the monitoring system and to improve on efficiency during the remediation process.

As Bangladesh is the main production country for Bel&Bo, FWF emphasises that Bel&Bo should prioritise monitoring of high-risk areas in the tail end, with a focus on the FWF enhanced monitoring programme for Bangladesh. Bel&Bo is recommended to mitigate root causes for excessive overtime.

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.	28%	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: In 2017 Bel&Bo sourced 28% of its production volume from locations where it buys at least 10% of the production capacity. An increase compared to 17% in 2015 and 23% in 2016. In 2017 Bel&Bo decided to focus on their top 50 producers to raise more awareness of the FWF approach and increase active participation to improve labour standards mentioned in the FWF Code of Labour Practices.

Recommendation: FWF recommends Bel&Bo to consolidate its supplier base where possible, and increase leverage at main suppliers to effectively request improvements of working conditions. It is advised to focus on implementation of the developed sourcing strategy that is agreed upon with top management/sourcing staff to assure that the quantitative target for the tail end to have a 100 production units less in 2018 compared to the start of the Bel&Bo membership in 2014, which is set for 2018, will be reached. We advise Bel&Bo to embed their consolidation strategy in the sourcing system with a focus on planning and forecasting.

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.	68%	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.	0	4	0

Comment: In 2017 Bel&Bo sourced 68% of its production items at factories where it has less than 2% of the total FOB, compared to 72% in 2016.

Recommendation: FWF recommends Bel&Bo to consolidate its supply base by limiting the number of suppliers in its 'tail end' to reduce the social compliance risks Bel&Bo is exposed to. This will allow Bel&Bo 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.	43%	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: In 2017 the amount of suppliers with a long term relationship increased from 37% to 43%.

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

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.3 All new production locations are required to sign and return the questionnaire with the Code of Labour Practices before first bulk orders are placed.	Yes	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.	2	2	0

Comment: Bel&Bo has developed a systematic approach for new suppliers to fill in the questionnaire and Code of Labour Practices. The CSR manager works with a color coding system. As long as the signed questionnaire and a photo of the posted Worker Information Sheet with the Code of Labour Practices are not received, Bel&Bo buyers can not order from that new supplier.

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.	Advanced	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.	4	4	0

Comment: Bel&Bo is aware of the specific risks for the countries it is sourcing by conducting and updating risk analyses. The FWF country studies are used in the risk analyses, which is published in the social report. For new factories there is a process in place in which Bel&Bo requires the signed questionnaire, posting of the Worker information Sheet with the FWF Code of Labour Practices and a full existing third party audit. The audits are systematically analysed with the FWF Audit Quality Assessment Tool and the CSR managers sends the Corrective Action Plans (CAPs) to the production units.

For new and existing production units Bel&Bo has developed a system with color codes (green-orange and red) in which the status of the factory can be seen. In case a Red color code has been appointed to a production unit, it cannot receive any new order. When a production unit improves, the color code can change to orange or green. This happens after approval of the CSR manager. It is communicated to new and existing production units that the CSR manager can change the color code when needed.

Recommendation: To increase on effectiveness of the Due Diligence process of Bel&Bo it is recommended to focus on follow of CAPs within the time-frame Bel&Bo agreed upon with the production units. With the amount of production units Bel&Bo has, a tool in IT system corresponding with the code system would be helpful for the CSR manager to check how production units 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.	Yes, and leads to production decisions	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.	2	2	0

Comment: Production units' level of social compliance are classified in a systematic way using a color coding system. In case of a red code factories cannot receive new orders, while at the same time Bel&Bo buyers are encouraged to source from the production units with a green code. Twice a year all production units are evaluated by Bel&BO before a collection launch by Sourcing, QC and CSR staff.

Bel&Bo aims to increase FOB at the production units with a green code with progress in the implementation of corrective actions plans.

Recommendation: Bel&Bo is encouraged to share factory-specific results of the bi-annual evaluation with the factories.

FWF encourages Bel&Bo to further develop the business relationship with factories which have made progress in the implementation of corrective action plans. Bel&Bo intends to build long term relationships with the current supplier base. For the situations where this is not possible, FWF suggests to Bel&Bo to develop an exit strategy process of how to leave a factory in a responsible way.

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 production planning system of Bel&Bo is rather straightforward. Bel&Bo has two seasons. 76% was sourced in Asia (main production countries are India, Bangladesh and China), in which orders are placed six months ahead to limit the risk on overtime in the factories. In the European countries and Turkey orders are placed 4 months ahead. Bel&Bo has no insight in the exact production capacity per factory.

Recommendation: 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. FWF recommends Bel&Bo to establish a strong production planning system which is based on the production capacity of the factory for regular working hours.

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: In all factories audited by FWF, overtime was found. Through the risk analyses Bel&Bo has general awareness of root causes of overtime.

In case mentioned in the audit report Bel&Bo requires improvement via CAPs, factory visits and other contact moments. Bel&Bo is not yet focused on identifying root causes with the production units.

Recommendation: Bel&Bo is recommended to discuss overtime with factory management and develop instruments or policies to deal with possible delays to avoid excessive overtime. Those instruments could include being flexible with delivery dates, prioritizing orders, offer support/flexibility for material delivery, ordering in low season etc. The outcomes of the root cause analysis can be used for identifying strategies that minimise the impact of its sourcing practice on working hours at other factories.

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: Bel&Bo estimates that they are paying average prices in each country that allows payment of legal minimum wage. On factory level, the relationship between prices and wages of the workers of the different units is not known.

Recommendation: At a minimum, Bel&Bo 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.

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 minimum wage problems reported	If a supplier fails to pay minimum wage, FWF member companies are expected to hold management of the supplier accountable for respecting local labour law.	Complaint reports, CAPs, additional emails, FWF audit reports or other documents that show minimum wage issue is reported/resolved.	2	2	-2

Comment: During the 2017 FWF audits no failure to pay minimum wages was found.

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: No evidence of late payments was found. Bel&Bo is aware of a risk of late payments through bank transfers.

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: Bel&Bo discusses the wage ladders as part of Corrective Action Plan follow up process.

Recommendation: FWF encourages Bel&Bo to discuss with suppliers about possibilities to work towards higher benchmarks. It is advised to start with suppliers where Bel&Bo has high leverage and long term business relationship. FWF has developed experience with approaches that ensure that production workers in the selected facility take full benefit from the additional amounts that are committed to wage increases. FWF could give companies specific guidance on process rollout on request.

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: 44

Earned Points: 20

2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	77%	
% of production volume where monitoring requirements for low-risk countries are fulfilled	3%	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	80%	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

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.	Yes	2 part indicator: FWF audit reports were shared and discussed with suppliers within two months of audit receipt AND a reasonable time frame was specified for resolving findings.	Corrective Action Plans, emails; findings of followup audits; brand representative present during audit exit meeting, etc.	2	2	-1

Comment: Bel&Bo systematically and timely shares FWF audit reports and Corrective Action Plans with their production units. The status of a Corrective Action Plan corresponds with the the color coding system. The CSR manager regularly reminds production units to follow up and collect answers on pending issues. Currently this is a manual process, monitored by the CSR manager.

Recommendation: FWF recommends Bel&Bo to share audit reports and CAPs with the worker representation in factories.

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.	Intermediate	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.	6	8	-2

Comment: Bel&Bo collects audit reports and existing CAPs for each production location. The CSR manager classifies the production unit with a color code, depending on the issues found in audit and CAP. Bel&Bo gives priority to the action points mentioned in existing Corrective Action Plans and adds extra action points based on the Code of Labour Practices. Timelines for follow-up are established. Bel&Bo does not always immediately send reminders when a deadline for a production unit to react has passed. The country risk analysis is used in the discussions about social compliance between the CSR manager and production units. Bel&Bo was able to show that issues mentioned in the CAPs were remediated by filing the reaction of the production unit on the CAP and photo's that shows the improved situation.

In 2017 Bel&Bo has trained and hired a local consultant in China to visit the factories and discuss labour conditions.

In general for the tail-end FWF has lighter monitoring requirements. However, for the high risk areas with a FWF enhanced monitoring programme such as Bangladesh, collection of audits and follow-up of CAP is required. During this financial year not all production units were included in the enhanced monitoring.

Requirement: In the tail-end FWF requires audits at the production locations in specific high-risk areas where FWF requires an enhanced monitoring programme as stipulated in the Brand Performance Check Guide or other policy documents.

Recommendation: As a next step FWF recommends to focus on follow up of CAPs including assuring that production units react on CAPs in a timely and adequate manner. Reminding the productions immediately after a deadline has passed is recommended and Bel&Bo could consider to investigate how an IT system can be helpful for CAP follow-up with an automatically generated reminder.

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.	52%	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.	3	4	0

Comment: The CEO, the sourcing manager and other departments regularly visit the production locations which allow Bel&Bo to obtain a basic knowledge of the level of working conditions. The Health and Safety checklists is actively used during these visits. During the visits of the CSR manager visits there are in-depth discussions about CAP follow-up specifically and labour conditions in general between Bel&Bo and the production unit.

Recommendation: FWF recommends the CSR manager to share country-specific general insights on CAP follow up of the Bel&Bo production units compared with the country risk studies with all Bel&Bo staff that is in direct contact with the suppliers. It was mentioned that time to discuss social compliance often is limited and this knowledge is helpful to focus in discussions with suppliers.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.6 Existing audit reports from other sources are collected.	Yes, quality assessed and corrective actions implemented	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.	3	3	0

Comment: In 2017, 27% of the FOB was monitored through FWF audits and 50% through external audits. Bel&Bo systematically collects existing audit reports and has set up a monitoring system for audits. Bel&Bo is systematic in collecting audit reports and serious and consistent in the use of the Audit Quality Assessment Tool, which makes that Bel&Bo has relatively many audit reports qualified as unreliable. Based on the analysis of an audit report the CSR manager sends the production units a detailed and specific CAP, with clear time frames for the factory to respond.

Bel & Bo has a grading system for audit reports with the categories good, reliable, questionable and unreliable. For the monitoring threshold the reports in the categories good and reliable were included. In addition to this, 3 audit reports in the category questionable were included in the cases where there was a response of the factory on CAP follow-up during visits of Bel&Bo and responses of Bel&Bo within the pre-set timeframe. In the category questionable the reports without immediate reminders after the deadline for a production unit on a CAP were not included. The reports in the category unreliable were excluded for the monitoring threshold.

Recommendation: FWF recommends Bel&Bo to further develop their internal audit monitoring system and advises to change the name of the category "questionable" since this category for Bel&Bo actually means 'basic/looking reliable, though extra proof needs to be added'.

In addition to this FWF suggest to Bel&Bo to communicate to production units that Bel&Bo is expecting and assessing the quality of the audit reports as an attempt to limit production units to send existing third party with insufficient quality.

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.	3	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	Advanced			6	6	-2
Compliance with FWF guidance on risks related to Turkish garment factories employing Syrian refugees	Intermediate			3	6	-2
Other risks specific to the member's supply chain are addressed by its monitoring system	Intermediate			3	6	-2

Comment: Bel&Bo has sourced 31% of its purchasing volume from Bangladesh in 2017. Not all factories are covered by the Accord/Alliance. Bel&Bo followed the FWF webinar September 2017 which resulted in a factory-analysis and follow up actions with a focus on factories that are not under the Accord/Alliance. Bel&Bo could prove in a sample that health and safety is part of the CAPs. However, some audits for new factories from Bangladesh which are covered by the Accord/Alliance, were not yet collected and analysed due to low FOB. In these cases audits were not analysed and CAPS for remediation were not written. In 2017 Bel&Bo has not yet signed the Bangladesh Accord and will become a signatory of the Accord in 2018.

Bel&Bo has a policy outlining its approach to prevention of abrasive blasting and informs and monitors its suppliers of denim.

Bel&Bo has collected though not yet implemented, several recommendations from the FWF webinar about Syrian Refugees in Turkey to integrate in their approach. In addition to the CAPs follow up, the situation of Syrian Refugees is discussed with suppliers.

The audit planning of Bel&Bo is, in addition to other factors, based on potential risk factors (such as Sumangali in India, subcontracting in Bangladesh or other factors as listed in the risk analysis in the social report of Bel&Bo). They are also addressed in the supplier questionnaires and during the CSR managers visits of the production units.

Requirement: Bel&Bo should make sure that steps are taken to ensure that all production locations are inspected for building and fire safety and the correction action plans are being followed up. This will be ensured when Bel&Bo becomes a signatory of the Accord in 2018.

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.	Active 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.	2	2	-1

Comment: Bel&Bo actively cooperates with other FWF members in resolving corrective actions at shared suppliers.

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: Monitoring requirements for low-risk countries were fulfilled for 75% of total production in these countries.

Recommendation: FWF recommends to fulfill monitoring requirements for all production in low-risk countries in order for it to be counted towards the monitoring threshold. All production sites in low-risk countries must: - Be visited annually by affiliate representatives; - Be informed of FWF membership and return the completed CoLP questionnaire before production orders are placed; - Be aware of specific risks identified by FWF; - Have the FWF Worker Information Sheet posted in local languages.

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.	No external brands resold	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.	N/A	2	0

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).	No external brands resold	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.	N/A	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: 29

Earned Points: 22

3. COMPLAINTS HANDLING

BASIC MEASUREMENTS	RESULT	COMMENTS
Number of worker complaints received since last check	1	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		
Number of worker complaints resolved since last check	1	

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: Bel&Bo's CSR manager is designated to address 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.	Yes	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.	2	2	0

Comment: Bel&Bo requires all production locations to share a picture of the posted worker information sheet at the beginning of production. These pictures are saved on the company server. Next, agents and all staff visiting production locations will take pictures of worker information sheets.

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.	50%	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.	3	4	0

Comment: At 50% of audited locations was at least half of the workers aware of the FWF worker helpline.

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	Yes	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.	3	6	-2

Comment: There was one complaint in a factory where Bel&Bo produced in 2017. Bel&Bo actively approached this factory to assure that the complaint was solved. An in-depth analysis of root causes of the complaint at that factory, was not conducted. Bel&Bo requested a FWF monitoring audit to assure that the situation is improved.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.5 Cooperation with other customers in addressing worker complaints at shared suppliers	No cooperation	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.	0	2	0

COMPLAINTS HANDLING

Possible Points: 15

Earned Points: 9

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: Several departments are represented in the Bel&Bo FWF team. The CSR manager keeps the different departments updated about FWF Membership requirements and prepares a presentation once a year for all colleagues. Each Bel&Bo shop receives the social report.

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 departments in direct contact with the suppliers are part of the Bel&Bo FWF team. Bel&Bo could show information sharing about 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.	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: The CSR Managers informs agents about FWF Membership and the FWF Code of Labour Practices. Bel&Bo emphasizes their consolidation strategy to agents, which led to a reduction in number of production locations used by the agents. Agents are involved in follow up on CAPs as well.

Recommendation: FWF encourages Bel&Bo to select agents which can be actively engaged in monitoring and remediation.

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)	12%	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.	2	6	0

Comment: Bel&Bo organized a WEP training at production locations which collectively account for 12% of Bel&Bo's purchasing volume.

Recommendation: FWF encourages the decision of Bel&Bo to engage their top 25 production units to participate in 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: As Bel&Bo focuses on WEP trainings as a way to inform production units about labour rights, Bel&Bo does not initiate other types of training

Recommendation: FWF encourages Bel&Bo to ask production units about other labour rights training as well.

TRAINING AND CAPACITY BUILDING

Possible Points: 15

Earned Points: 6

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&Bo is able to identify production locations, including subcontractors. Bel&Bo was able to show the production unit of a randomly selected product and could link this to the information about social compliance of that particular production unit.

On a more informal level, departments are working together. The quality manager for example directly informs the CSR manager in case she sees differences in quality which might be an indication for subcontracting.

Recommendation: Bel&Bo is advised to develop a systematic approach to complete the suppliers list in which:

- 1) Information from audit reports, CAP follow up and complaints is automatically included
- 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: Information sharing happens in a more formal way through the meetings of the Bel&Bo FWF team.

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: Bel&Bo communicates about FWF membership online, in newsletters, in the monthly catalogue, with a specific FWF membership brochure, which is distributed in the shop. In addition to this, the FWF logo is visible in Bel&Bo's shops and on Bel&Bo bags.

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: Bel&Bo publishes the link to FWF Brand Performance Check on the 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: Bel&Bo is transparent about social performance, publishes the social report on the website. The report is also shared in the Bel&Bo shops.

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: FWF membership is discussed regularly on the management team's agenda.

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.	100%	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.	4	4	-2

Comment: There was a requirement for monitoring low-risk countries (indicator 2.9) in the Brand Performance Check 2016 and Bel&Bo organized to give follow-up and visit some, though not yet all, production locations in low risk countries.

EVALUATION

Possible Points: 6

Earned Points: 6

RECOMMENDATIONS TO FWF

- Don't go to fast in Belgium. During the first year of membership you were difficult to reach.
- Add as a requirement in the indicators that the CEO must go him/herself into the factories with focus on labour conditions.
- More consistency in the style and approach of brand performance check
- Advice on IT systems for SME/fast fashion companies

SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	20	44
Monitoring and Remediation	22	29
Complaints Handling	9	15
Training and Capacity Building	6	15
Information Management	4	7
Transparency	5	6
Evaluation	6	6
Totals:	72	122

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

59

PERFORMANCE BENCHMARKING CATEGORY

Good

BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

03-07-2018

Conducted by:

Mariette van Amstel, Supraja Suresh

Interviews with:

Tine Buysens: CSR Manager

Annick Tack: management assistant

Michel Delfosse: CEO

Sabine Brunein: Head of QC

Charlotte Delfosse: Head of Sourcing

Luc Van Vyve: CFO

Isabel Van Meirhaeghe: Marketing Manager