



## BRAND PERFORMANCE CHECK

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### Picture Organic Clothing

this report covers the evaluation period 01-04-2017 to 31-03-2018

## 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](http://www.fairwear.org). The online [Brand Performance Check Guide](#) provides more information about the indicators.

## BRAND PERFORMANCE CHECK OVERVIEW

Picture Organic Clothing

Evaluation Period: 01-04-2017 to 31-03-2018

MEMBER COMPANY INFORMATION	
Headquarters:	Gerzat, France
Member since:	01-04-2017
Product types:	Outdoor, Sportswear
Production in countries where FWF is active:	China, India, Turkey, Viet Nam
Production in other countries:	France, Hong Kong, Lithuania, Taiwan, Thailand
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	69%
Benchmarking score	45
Category	Good

## Summary:

Picture has met most of FWF's performance requirement and shown the initial efforts to monitoring and improving social compliance in their supplier base within their first year of FWF membership. In 2017, Picture monitored 69% of their supply chain, and combined with a benchmark score of 45, means that FWF has awarded Picture the 'Good' rating.

In their first year of membership, Picture's monitoring threshold was reached by fulfilling monitoring requirements at low-risk production locations and collected external audits. Picture did not conduct a FWF audit however, for the external audit, they followed the FWF quality assessment tool and developed a Corrective Action Plan to follow up with their supplier. Making sure their suppliers are audited by the FWF team should be a major focus for the upcoming year in order to get a more detailed audit with more insight into their supply chain.

Picture's biggest challenge in 2017 has been obtaining all the information required from suppliers. Picture has two main suppliers in China and Turkey that account for 84% of total production, who both have signed and returned questionnaires and posted the Code of Labour Practices. The remaining locations account for the tail end and have not yet all returned the information. Picture is required to inform all suppliers of their FWF membership and commitment, which includes making sure the worker information sheets are posted at all their suppliers and the questionnaires are signed and returned. Additionally, Picture should review the smaller suppliers and start consolidating their supplier base in order reduce the social compliance risks and have more influence on improving the working conditions.

For the coming year, FWF recommends Picture to create a more systematic approach to its due diligence process when selecting suppliers and to improve the transparency of its production locations. A risk analysis as part of the decision-making process of selecting new suppliers is an important step to mitigate risk and prevent potential problems.

FWF recommends Picture to develop a process to assess the risks associated with operating in specific production areas. When starting operations in a new country, FWF advises to use information from FWF country studies and wage ladders and use the FWF Health and Safety guidelines. Picture needs to develop a written set of guidelines and internal policies within their sourcing strategy that account for the risks in the areas they source from. Picture specifically needs to develop clear policies and procedures to address the country-specific risks related to Syrian refugees in Turkey. Developing these internal processes will strengthen their internal monitoring systems and provide a base to analyse and effectively evaluate the progress of their suppliers.

## 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.	86%	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: Picture works with two main suppliers who make up 84% of their total production, the remaining percentage is made up of smaller suppliers. In 2017, 86% of its production came from production locations where it buys at least 10% of production capacity.

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.	16%	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.	2	4	0

Comment: In 2017, 16% of Picture's production volume came from production locations where it buys less than 2% of its total FOB.

Recommendation: FWF recommends Picture to consolidate its supply base by limiting the number of suppliers in its 'tail end'. To achieve this, Picture should determine whether suppliers where it buys less than 2% of its 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.	89%	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: In 2017, 89% of Picture's production volume came from production locations where a business relationship has existed for over five years.

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: Picture's two main suppliers signed and returned the questionnaires, however it is still gathering questionnaires from the remaining suppliers. Picture visits at least twice a year however has also had to rely on emails and their agent to get this information, which has proved to be a slow process.

Requirement: Picture need to create a written strategic sourcing policy in which the signing and returning of the questionnaire with the Code of Labour Practices before first bulk orders is a requirement. Picture needs to show the remaining suppliers have signed and returns these questionnaires and evaluate their accuracy during visits to ensure that suppliers understand and commit to the Code of Labour Practices.

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:** Picture has an informal system of assessing the factories for production. This is based on agent recommendations, visits to the production site and initial discussions with factory management. When sourcing new suppliers Picture assesses the social and environmental sustainability quality of the factory. This discussion includes social compliances and areas of improvements based on reports. Picture checks the ability of the factory to work with their special materials, and flexibility and ease of discussions with factory management. Picture gathers any past or existing audit reports and certifications at the factory. Picture also checks what other brands their who are in the same market and share a similar ethos.

**Requirement:** Picture needs to make use of the Health and Safety Guide or a similar assessment during their visits to factories.

**Recommendation:** FWF recommends Picture to read more information such as country studies in the areas to be more aware of risks and any human rights issues as part of their due diligence process. Furthermore, Picture should describe the process of assessing working conditions at potential new suppliers in a written 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.	No	A systemic approach is required to integrate social compliance into normal business processes, and supports good decisionmaking.	Documentation of systemic approach: rating systems, checklists, databases, etc.	0	2	0

**Comment:** Picture evaluated its supplier base in an ad-hoc manner, based on quality of communication with suppliers and visual inspection during factory visits. 2017 was Picture's first year of FWF membership in which the focus was gathering information back from suppliers and mapping production locations. Despite informing the suppliers of their new FWF membership, response of factories has been slow.

**Requirement:** Members are encouraged to develop a systematic evaluation/grading system for suppliers where compliance with labour standards is a criterion for future order placement. Part of the system can be to create an incentive for rewarding suppliers for realised improvements in working conditions. Part of the system can show whether and what information is missing per supplier and can include outcomes of audits, trainings 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:** Production lead times, dates and deadlines are preset by the factory, after which Picture plans backwards in order to set their internal 'global' year plan and deadlines for suppliers. Picture works with two collections per year, therefore discusses each season collection at least a year ahead of time to try account for some unforeseen circumstances. Picture has a rough idea about production capacity by factory however is yet to make a comparison between capacity and labour minutes required to make their products.

**Recommendation:** Picture is recommended to gather more information on working hours through a FWF audit and more discussions with factory management about the basis for lead times and more accurate insight into their capacity. Picture should calculate the labour minute for their products and compare this to the information provided by the factory in order to confirm whether the plans given by factories are actually enough to support reasonable 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:** 2017 was Picture's first year of FWF membership. There was no FWF audit at Picture therefore no information excessive overtime. However the external audit conducted revealed some overtime. Picture was unable to get a clear break down of overtime from this report though because of sampled overtime hours over the last two years.

**Recommendation:** FWF recommends that Picture conduct a FWF audit at suppliers, this can be a good base for further discussion on overtime. Picture also needs to have more detailed conversations about overtime with their suppliers and identify peak times for overtime.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.8 Member company's pricing policy allows for payment of at least the legal minimum wages in production countries.	No policy in place	The first step towards ensuring the payment of minimum wages - and towards implementation of living wages - is to know the labour costs of garments.	Formal systems to calculate labour costs on per-product or country/city level.	0	4	0

**Comment:** Picture has a cost plus pricing method, in which they receive a total cost per garment from its supplier. The pricing is set by the supplier, and is discussed and negotiated by Picture if item it is a recurring or new item in production. Picture has not yet discussed the price breakdown with suppliers, therefore does not have insight into the labour cost.

**Requirement:** Picture is required to understand minimum wages per production country of sourcing. Picture needs to develop a pricing policy where it knows the labour cost of garments and which allows the payment of at least legal minimum wages in production countries. This requires increased transparency from its supplier and is essential to make a meaningful assessment of minimum wage payments.

**Recommendation:** Picture should develop a clear understanding the legal minimum wages per country in order to start setting up a policy. Picture should start collecting information on labour cost at their main suppliers in Turkey and China. A FWF audit can help gain insight into this at some factories, however Picture can make additional use of the costing sheets per country and the FWF labour minute costing publication.

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: 2017 was Picture's first year of FWF membership. There was no FWF audit at Picture therefore no information on failure to pay legal minimum wages.

Recommendation: Picture should initiate a FWF audit in order to have more information on their factories with regards to wages.

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: 2017 was Picture's first year of FWF membership however none of Picture's suppliers were audited by FWF. There was no information on late payments at suppliers.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.11 Degree to which member company assesses root causes of wages lower than living wages with suppliers and takes steps towards the implementation of living wages.	No efforts shown.	Sustained progress towards living wages requires adjustments to member companies' policies.	Documentation of policy assessments and/or concrete progress towards living wages.	0	8	0

Comment: Picture is still at the initial stage of gathering information from factories about the wages.

Recommendation: Picture should initiate FWF audits at factories in order to start gathering more wage information. Picture should also create wage ladders for their main suppliers in China and Turkey.

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

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## PURCHASING PRACTICES

Possible Points: 42

Earned Points: 14

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## 2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	0%	
% of production volume where monitoring requirements for low-risk countries are fulfilled	1%	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	69%	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 Sustainability Manager is overall responsible for follow up on any problems, with the support of the agent, who regularly visits the supplier.

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: The external audit initiated by Picture was shared and discussed at length with the factory management. The CAP follow-up was also discussed and timelines were agreed upon.

Recommendation: Picture should encourage the resolution of audit findings and CAPs in factories by both factory management as well as the factory's worker representation.

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.	No Caps Active	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.	N/A	8	-2

Comment: 2017 was Picture's first year of FWF membership however none of Picture's suppliers were audited by FWF. Picture collected an external audit from their factory and has followed up on this CAP. Two of the four findings were already remediated.

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.	100%	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: Picture visits all their production locations at least twice a year. In 2017, all of Pictures suppliers were visited by either their Sustainability Manager, external agent, Designer or Co-founders.

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, Picture has collected an external audit report for their main supplier that accounts for 68% of their total production. The report was assessed for its quality and a Corrective Action Plan created based on the quality assessment and followed up on the findings.

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.	-2	6	-2
Compliance with FWF enhanced monitoring programme Bangladesh	Policies are not relevant to the company's supply chain			N/A	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	Insufficient			-2	6	-2
Other risks specific to the member's supply chain are addressed by its monitoring system	Insufficient			-2	6	-2



**Comment:** Picture has had a long term relationship with their main suppliers in China and Turkey, and bases their working relationship on trust. Picture is informed of risks through their agent and through open conversations with the factory management.

Picture, however, does not have a Syrian refugee policy and has not discussed this topic with factory management because it perceived that the factory was at lower risk for refugee workers due to distance from the border. Picture was also not informed about the risks specific to its supply chain in China.

**Requirement:** FWF expects Picture to take a more active approach to increase knowledge and map the risks at its production locations. Picture should establish a Syrian Refugee policy and discuss this with the Turkish factory management. Please refer to FWF’s guidance on Risk related to Turkish garment factories employing Syrian refugees for more information about expected steps.

Similarly, Picture should gather more information on the risks per production country. This will help develop a systematic criteria for assessment of their suppliers. FWF country studies can be used as a base to gather some of the information on country specific risks.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.8 Member company cooperates with other FWF member companies in resolving corrective actions at shared suppliers.	No CAPs active, no shared production locations or refusal of other company to cooperate	Cooperation between customers increases leverage and chances of successful outcomes. Cooperation also reduces the chances of a factory having to conduct multiple Corrective Action Plans about the same issue with multiple customers.	Shared CAPs, evidence of cooperation with other customers.	N/A	2	-1

**Comment:** Picture does not currently share suppliers with any FWF members.

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: Picture visited the production location and discussed FWF membership.

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: 19

Earned Points: 10

### 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		
Number of worker complaints resolved since last check		

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: Picture's Sustainability Manger is responsible for addressing 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: Picture tries to visit production locations at least twice a year, in 2017 these trips were not used to check whether the Worker Information Sheet has been posted besides visits to their two main suppliers. Agents or other staff members have been relied on to gather this information mostly in form of photos for the Sustainability Manager. 11 out of 25 active production locations posted the CoLP.

Requirement: Picture is required to make sure the Code of Labour Practices is posted in the factory, and have discussions with factory management on the importance of the codes.

**Recommendation:** FWF recommends Picture to use the visits to also check on social compliance issues and FWF basic requirements such as the posting of the worker information sheet. The Sustainability Manager can also create small visit reports with a photo log to be able to record this information systematically. Information for this small visit reports can also be provided by calls, email exchanges and more photos made by the agents or designers visiting 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.	No audits conducted or production in countries without FWF helplines or WEP	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.	N/A	4	0

**Comment:** 2017 was Picture's first year of FWF membership however none of Picture's suppliers were audited by FWF.

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: 3

Earned Points: 1

## 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: Picture informed staff about FWF memberships during sales meetings with agents and distributors. The Sustainability manager presents figures and guidelines during the sustainability sales force meeting.

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: Picture internally trained their staff in direct contact with suppliers on FWF requirements and the Code of Labour Practices. This training included external production agents.

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 + actively support COLP	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.	2	2	0

Comment: Picture works with two agents who are located in the same office building. Picture's agents have been informed of the FWF requirements. The agents assist with sharing the ColP and making sure questionnaires are signed. Furthermore they accompany Picture to different factory visits, and do visits for Picture's smaller suppliers.

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)	No production in WEP areas	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.	N/A	6	0

Comment: 2017 was Picture's first year of FWF membership. Going forward, Picture plans to audit their suppliers to start identifying the training needs.

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: Picture has not yet looked into any trainings in countries where the FWF Worker Education Program is not offered.

Recommendation: Picture should research the available training programs through local stakeholders in the locations where FWF's WEP is not offered.



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## TRAINING AND CAPACITY BUILDING

Possible Points: 9

Earned Points: 5

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## 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:** Picture works with an online system which links all its products to suppliers and location of production. The system provides detailed information on each factory; including size, location, contacts, number of workers and which item were produced per location. Picture can extract the information from the system in order to find out missing information or additional required information. Picture works with an agent who helps to also provide any missing information on the suppliers. Picture is aware of all their major production locations, however it is in the process of identifying and discussing subcontractors.

**Requirement:** Picture is advised to develop a systematic approach to complete the suppliers list in which 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.

**Recommendation:** FWF recommends that in addition to the systematic log of supplier information, Picture also make use of this system to track information from audit reports, CAP follow up and any complaints.

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:** Picture's Sustainability Manager regular shares information to the rest of the team on conditions at the production location. The agent and co-founders who regularly visit the sites also provide updates to the Sustainability Manager, via semi-monthly reports. This information is shared with other relevant staff as needed.

**Recommendation:** FWF recommends Picture to create small visit reports that can be systematically stored and remediation follow ups can be tracked by any Picture staff member visiting the production location. This is because the suppliers are often visited by different Picture representatives.

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## 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.	Significant problems found, but appropriately remediated	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.	0	2	-3

Comment: Picture communicates about FWF membership through the company's website however needs to use the logo correctly in its transparency information.

Requirement: Picture is required to use the FWF logo with the reference "Picture is member of Fair Wear Foundation" in a clear and visible way so as to avoid the confusion of logo with a certification.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
6.2 Member company engages in advanced reporting activities	Production locations are disclosed to the public	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.	2	2	0

Comment: Picture strives to be 100% transparent to the public and publishes its production locations on its website. Picture also plans to publish the FWF Brand Performance Check on its website after its first performance check.

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: Picture completed and posted its annual Social Report on its website. The report accurately reflects the work Picture undertook in 2017.

## TRANSPARENCY

Possible Points: 6

Earned Points: 4

## 7. EVALUATION

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

Comment: FWF membership is discussed regularly within team meetings however is also annually assessed as part of the sustainability budgeting.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
7.2 Level of action/progress made on required changes from previous Brand Performance Check implemented by member company.	No requirements were included in previous Check	In each Brand Performance Check report, FWF may include requirements for changes to management practices. Progress on achieving these requirements is an important part of FWF membership and its process approach.	Member company should show documentation related to the specific requirements made in the previous Brand Performance Check.	N/A	4	-2

## EVALUATION

Possible Points: 2

Earned Points: 2

## RECOMMENDATIONS TO FWF

Picture would like FWF to provide further assistance in drawing out plans and timelines for FWF requirements.

## SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	14	42
Monitoring and Remediation	10	19
Complaints Handling	1	3
Training and Capacity Building	5	9
Information Management	4	7
Transparency	4	6
Evaluation	2	2
Totals:	40	88

### BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

45

### PERFORMANCE BENCHMARKING CATEGORY

Good



## BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

23-07-2018

Conducted by:

Sandra Gonza; Rosan van Wolveren

Interviews with:

Julien Durant - Picture Co-Founder  
Florian Palluel, Sustainability Manager