



BRAND PERFORMANCE CHECK

Anna van Toor

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this report covers the evaluation period 01-01-2018 to 31-12-2018

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

Anna van Toor

Evaluation Period: 01-01-2018 to 31-12-2018

MEMBER COMPANY INFORMATION	
Headquarters:	Meerkerk, Netherlands
Member since:	01-02-2013
Product types:	Fashion
Production in countries where FWF is active:	China, India, Tunisia, Turkey
Production in other countries:	Lithuania, Madagascar, Pakistan, Poland, Portugal, Serbia
BASIC REQUIREMENTS	
Workplan and projected production location data for upcoming year have been submitted?	Yes
Actual production location data for evaluation period was submitted?	Yes
Membership fee has been paid?	Yes
SCORING OVERVIEW	
% of own production under monitoring	93%
Benchmarking score	55
Category	Good

Summary:

Anna van Toor has met most of FWF's performance requirements. The brand monitored almost 93% of its total purchasing volume, which is well above the 80% required by members after three years of membership. The benchmarking score of 55 places Anna van Toor in the 'Good' category.

In 2018, Anna van Toor placed more orders at suppliers with which it has a long term business relationship. This stimulated good communication and therefore helped work towards implementing the FWF Code of Labour Practices. Anna van Toor places a constant flow of orders year-round, and production capacity and possible delays are discussed openly.

In order to start working towards living wages at its supplier locations, Anna van Toor gained more insight into the living costs of some workers at its Serbian supplier via interviews in 2018. Although this is a good first step, Anna van Toor needs to discuss living wages with supplier management and investigate wage levels for all workers at this supplier. Furthermore, for the brand's other suppliers, more insight between the buying prices and wage levels is needed.

In 2018, Anna van Toor's main suppliers in Turkey and China were audited. In order to comply with FWF's risk policies for Turkey and other countries, more active risk mitigation measures should be taken. Furthermore, a systematic approach for evaluating Code of Labour Practices compliance of Anna van Toor's entire supplier base should be implemented. Moreover, Anna van Toor is required to actively raise awareness about the FWF Code of Labour Practices and FWF complaints hotline among its suppliers. For the next Brand Performance Check, Anna van Toor needs to make sure it meets the monitoring requirements for its tail-end production locations. Anna van Toor could take additional advantage of FWF resources and participate more in events like stakeholder meetings and supplier seminars.

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.	49%	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 2018, Anna van Toor bought 49% of its production volume from production locations where the brand buys at least 10% of the production capacity. Anna van Toor's main suppliers are located in Turkey, Portugal, Poland, and China. The company tries to place orders at existing suppliers as much as possible. In order to supply the constantly changing customer demand, Anna van Toor does need to introduce new products and new materials from time to time. When the current suppliers cannot make these new products, a new supplier needs to be added to the supplier list.

Anna van Toor does not have a written sourcing strategy to offer guidelines on supplier consolidation, which makes it vulnerable to changes in case of staff turnover.

Recommendation: FWF recommends Anna van Toor to consolidate its supplier base where possible, and increase leverage at main supplier(s) to effectively request improvements of working conditions. It is advised to describe the process of consolidation in a sourcing strategy that is agreed upon with top management/sourcing staff.

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.	9%	FWF provides incentives to clothing brands to consolidate their supplier base, especially at the tail end, as much as possible, and rewards those members who have a small tail end. Shortening the tail end reduces social compliance risks and enhances the impact of efficient use of capital and remediation efforts.	Production location information as provided to FWF.	3	4	0

Comment: In 2018, 9% of Anna van Toor’s production volume came from production locations where the brand buys less than 2% of its total FOB. This is a reduction from last year’s 11%.

Recommendation: FWF recommends Anna van Toor to consolidate its supply base by limiting the number of suppliers in its ‘tail end’. To achieve this, Anna van Toor 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.	71%	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.	3	4	0

Comment: In 2018, 71% of Anna van Toor’s production volume came from production locations where a business relationship exists for at least five years. This is a notable increase compared to last year’s 45%. Anna van Toor placed more orders at suppliers it works with for a long time. The brand prefers to work with these suppliers because of good communication.

Recommendation: It is advised to describe policies regarding maintaining long term business relationships in a sourcing strategy that is agreed upon with top management/sourcing staff.

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: Anna van Toor works with an overview sheet of its suppliers, including a column on whether the questionnaire with the CoLP is signed and returned. The brand stores the questionnaires in folders per supplier on its server. All questionnaires are on file, except from one supplier in Polen. Due to insufficient capacity, another Polish supplier placed part of Anna van Toor's order at this supplier without Anna van Toor knowing this beforehand. The Polish supplier does not want to work with Anna van Toor and refuses to sign the questionnaire. Anna van Toor's main supplier in Poland stressed that this was a one time order and that it will not happen again.

Requirement: Anna van Toor needs to ensure that new production locations sign and return the questionnaire before first orders are placed.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.4 Member company conducts human rights due diligence at all (new) production locations before placing orders.	Intermediate	Due diligence helps to identify, prevent and mitigate potential human rights problems at suppliers.	Documentation may include pre-audits, existing audits, other types of risk assessments.	2	4	0

Comment: When selecting new production facilities, Anna van Toor mainly relies on its existing network of production locations, agents and employees. This means it mainly focuses on producing in countries where the company already knows the human rights and labour situation.

In 2018, Anna van Toor introduced a roadmap for adding new suppliers. The roadmap includes the following steps: 1. Is the factory suitable? (among other points, assessing the capacity, audit reports, and other FWF members sourcing), 2. Inform factory about Anna van Toor's guidelines (Anna van Toor's manual, Worker Information Sheet, and the FWF Questionnaire), 3. All information should be received and signed within one month (all documents of step 2 should be signed and send back, or posted in the factory), 4. Visit the factory by Anna van Toor or agent (Health and Safety check supported by pictures), 5. Analyse audits and follow-up (FWF or BSCI audits).

Part of step 1 is reading the FWF country study. Anna van Toor started to make summaries of the country studies to make these more accessible for its production staff. In Serbia, Anna van Toor works with a Dutch agent. The brand visited the factories several times and talked with both workers and management. The Head of Production and the Production and Design Manager have the final say in whether a new supplier is added or not. This decision is influenced by evaluating the first three steps the roadmap for adding new suppliers.

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: Anna van Toor works with an overview of all its suppliers, including formal and informal audit dates, training dates, whether the supplier has been visited, the questionnaire has been sent back, and the worker information sheet has been posted. Apart from whether the supplier is located in a high or low-risk country, no other indicators for the compliance with the CoLP are included in this overview.

Anna van Toor evaluates suppliers continuously, specifically on quality issues, and good quality leads to repeat orders. Compliance with the Code of Labour Practice is not a systematic part of the supplier evaluation. In 2018, Anna van Toor stopped cooperation with two of its suppliers (via one agent) because of continued delays and no improvements despite several conversations on this topic. Anna van Toor worked on a draft exit strategy that needs to be formalised. In general, the brand always aims to find solutions together with suppliers instead of stopping cooperation. Suppliers are informed when Anna van Toor is considering to stop the cooperation and orders are reduced slowly.

Requirement: A systematic approach is required to integrate social compliance into normal business processes and supports good decision-making. The approach needs to ensure that the member consistently evaluates the entire supplier base and includes information into decision-making procedures.

Recommendation: FWF encourages Anna van Toor to develop an evaluation/grading system for suppliers where compliance with labour standards is a criterion for future order placement. Part of the system can be to create an incentive for rewarding suppliers for realised improvements in working conditions. Such a 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.	Strong, integrated systems in place.	Member company production planning systems can have a significant impact on the levels of excessive overtime at production locations.	Documentation of robust planning systems.	4	4	0

Comment: Anna van Toor places monthly orders at its suppliers, which means the brand spreads the pressure it puts on production and places orders during low season. In the meantime, it is able to meet the customers' demand for more collections. When Anna van Toor selects a new supplier it requests information about the supplier's capacity and will not over-ask this capacity. When a relatively large order will be placed, Anna van Toor pro-actively checks with the supplier whether it is able to meet the lead time. Lead times are based on previous experience that suppliers need on average 3-4 weeks for production after everything is approved and all needed materials are in-house. In practice, this means that for production, lead times are set between 3.5 and 4 months. For a part of its suppliers, Anna van Toor buys the fabrics, for these suppliers lead time is shorter. Anna van Toor takes holidays into account when placing orders.

In 2017, Anna van Toor started with a salesman sample collection, which means that the brand starts with the production process earlier and is able to inform suppliers more in advance when production needs to take place. In this way, suppliers are able to plan more ahead. Because of an increased focus and more time for the development process and better communication between styling and production, fewer changes in design are needed after placing the orders.

In case of delays, Anna van Toor tries to understand the cause of the delay and to work towards a suitable solution, e.g. by extending the delivery date for (part of) the order. In general, Anna van Toor communicates openly with its suppliers about lead times and (potential) delays.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.7 Degree to which member company mitigates root causes of excessive overtime.	Intermediate 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.	3	6	0

Comment: In the 2018 audit in China, excessive overtime was found. Because of difficult communication and two different intermediaries, Anna van Toor could not make progress in addressing this issue with the supplier. The factory management refuses to answer its questions regarding this issue. In order to work towards improvements on the overtime finding, Anna van Toor planned a training program at this factory for July 2019. In 2018, Anna van Toor received the attendance records of its Turkish supplier for which excessive overtime was found in a 2017 audit. The records did not show excessive overtime. As Anna van Toor is not sure whether these records are correct it will continue to follow-up on this issue by requesting more records.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.8 Member company can demonstrate the link between its buying prices and wage levels in production locations.	Insufficient	Understanding the labour component of buying prices is an essential first step for member companies towards ensuring the payment of minimum wages – and towards the implementation of living wages.	Interviews with production staff, documents related to member's pricing policy and system, buying contracts.	0	4	0

Comment: A target price is given by the suppliers, based on samples orders. Anna van Toor does not negotiate on price but relates prices to prices of similar styles in the past. The price is specified to production costs, without insight into the share that is used to cover for labour costs. When the price given by the supplier is not meeting the target price of Anna van Toor, a solution is usually found by changing the details of a design or using cheaper fabrics. For some suppliers, Anna van Toor works with an agent. The brand cannot ensure that the agent makes sure that suppliers are paying at least legal minimum wages.

Requirement: Anna van Toor needs to demonstrate an understanding of the link between buying prices and wage levels, to ensure its pricing allows for the payment of the legal minimum wage.

Recommendation: At a minimum, Anna van Toor is recommended to investigate wage 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 into the labour costs per product. This forms the basis for ensuring enough is paid to cover at least a minimum wage and for taking steps towards living wages.

Furthermore, Anna van Toor is encouraged to provide training on cost breakdown to its agents.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.9 Member company actively responds if production locations fail to pay legal minimum wages and/or fail to provide wage data to verify minimum wage is paid.	Yes	If a supplier fails to pay minimum wage or minimum wage payments cannot be verified, FWF member companies are expected to hold management of the supplier accountable for respecting local labour law. Payment below minimum wage must be remediated urgently.	Complaint reports, CAPs, additional emails, FWF Audit Reports or additional monitoring visits by a FWF auditor, or other documents that show minimum wage issue is reported/resolved.	0	0	-2

Comment: In the 2018 audit in China, working hours were not accurately recorded, hence the minimum wage could not be verified. Because of difficult communication and two different intermediaries, Anna van Toor could not make progress in addressing this issue with the supplier. The factory management refuses to answer its questions regarding this issue. In order to work towards improvements, Anna van Toor planned an FWF Workplace Education Program at this factory for July 2019.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.10 Evidence of late payments to suppliers by member company.	No	Late payments to suppliers can have a negative impact on production locations and their ability to pay workers on time. Most garment workers have minimal savings, and even a brief delay in payments can cause serious problems.	Based on a complaint or audit report; review of production location and member company financial documents.	0	0	-1

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.11 Degree to which member company assesses and responds to root causes for wages that are lower than living wages in production locations.	Intermediate	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach	Evidence of how payment below living wage was addressed, such as: Internal policy and strategy documents, reports, correspondence with factories, etc	4	6	0

Comment: In 2017, Anna van Toor created an overview of the average wages and living wages at its suppliers. The data is based on audits and input from suppliers. As only limited suppliers shared their wage data with Anna van Toor, still a large amount of data is missing in the overview.

In order to get more insight into the living costs of the workers at its suppliers, Anna van Toor interviewed workers at its supplier in Serbia in 2018. Although this supplier is responsible for less than 1% of Anna van Toor's production, the supplier was selected to test out the living cost questionnaire as Anna van Toor is in good contact with its Dutch agent and visited the factory several times. Furthermore, Anna van Toor had no information on wages in Serbia yet, while it already did a wage assessment in Portugal in 2017 and will start discussing wages with its Turkish supplier, based on the findings of the 2018 audit. As a result of the interviews in Serbia, Anna van Toor made an overview of the living costs of different types of workers and different household compositions. These living costs were based on housing costs, food costs, travel costs, etc. From the interviews, Anna van Toor learned that for the interviewed workers, the wages are high enough to cover for the living costs as indicated in the interviews. Although Anna van Toor discussed wage levels with the supplier management, no wage records were collected for the other workers at this supplier.

Recommendation: FWF recommends Anna van Toor to follow-up on the living wage interviews with the factory management of the Serbian factory and ask for the wage records for all workers in order to assess whether living wages are paid to all workers. Furthermore, it is recommended to conduct similar assessments at other suppliers. In this way, the wage overview of its suppliers can be completed. FWF encourages Anna van Toor to discuss with suppliers about different strategies to work towards higher wages. It is advised to start with suppliers where the member is responsible for a large percentage of production and with a long term business relationship.

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

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.13 Member company determines and finances wage increases	None	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach.	Evidence of how payment below living wage was addressed, such as: internal policy and strategy documents, reports, correspondence with factories, etc.	0	4	0

Comment: Until now Anna van Toor has not yet determined the increase needed to bring all wages at the level of a living wage benchmark. Anna van Toor sees it as its responsibility to contribute to fair wages at its suppliers but living wages seem a bridge too far for now as the company also needs to stay competitive.

Requirement: Anna van Toor should analyse what is needed to increase wages and develop a strategy to finance the costs of wage increases.

Recommendation: To support companies in analysing the wage gap, FWF has developed a calculation model that estimates the effect on FOB and retail prices under different pricing models.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.14 Percentage of production volume where the member company pays its share of the target wage	14%	FWF member companies are challenged to adopt approaches that absorb the extra costs of increasing wages.	Member company's own documentation, evidence of target wage implementation, such as wage reports, factory documentation, communication with factories, etc.	1	3	0

Comment: In a BCSI audit, for which Anna van Toor added a section on wages, it turned out that at its supplier in Madagascar, on average, living wages are paid. The audit company conducted a basic living wage calculation, resulting in 261250 Ariary per employee considering a family of 6 with 3 children, 1 dependent and 2 adults whereby both adults are working. With an average wage level of 307000 Ariary, the wages at the supplier are on average higher than the living wage estimation.

Anna van Toor selected this supplier because of good quality products and was not aware of the wages when starting business with this supplier.

Recommendation: FWF recommends Anna van Toor to ensure that the living wage level is adjusted over time for inflation and other factors influencing the cost of living.

PURCHASING PRACTICES

Possible Points: 47

Earned Points: 24

2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	33%	
% of production volume where monitoring requirements for low-risk countries are fulfilled	53%	To be counted towards the monitoring threshold. FWF low-risk policy should be implemented. See indicator 2.9. (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.
Requirement(s) for next performance check	All tail-end suppliers must be visited by Anna van Toor's staff at least once every three years. During factory visits, labour conditions and the use of subcontractors must be discussed, outcomes of the discussion must be documented, and the FWF health and safety check-list must be completed and filed for FWF to assess during a Brand Performance Check.	
Total of own production under monitoring	93%	Measured as percentage of production volume (Minimums: 1 year: 40%; 2 years 60%; 3 years+: 80-100%)

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: At Anna van Toor all production staff has their own suppliers for which they are responsible to address FWF monitoring requirements. In addition, the Head of Production keeps an overview of the issues identified by the monitoring system.

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: In 2018, two FWF audits took place at Anna van Toor's main suppliers in China and Turkey. As the audit report of the audit in Turkey was only shared with Anna van Toor in 2019, the follow-up of this audit will be assessed in next year's Brand Performance Check.

Audit reports and Corrective Action Plans (CAPs) are shared with the factory and improvement timelines are established based on the timelines provided by FWF. Anna van Toor makes the CAPs online accessible for its contact persons at the suppliers. In this way, both parties always have the most recent updates available. Worker representatives are not systematically involved during the audit.

Recommendation: Before an audit takes place, Anna van Toor is recommended to check with the supplier whether worker representatives are active. In this way, they can be involved from the start of an audit and be invited for the audit opening and exit meeting. Including workers when following up on audit reports gives them the opportunity to be informed of issues in the factory and have a voice in the prioritisation of issues.

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

Comment: Anna van Toor uses the CAPs to keep track of remediation statuses. Open issues are marked red, partly resolved issues orange, and resolved issues green. Resolved issues are supported by photos, which are stored at Anna van Toor's server. When updates from the supplier-side are taking too long, reminder emails are sent by Anna van Toor. On a weekly basis, CAP follow-up statuses are discussed internally and open CAP issues are discussed with factory management during on-site visits. Worker representatives are not systematically in the audit follow-up.

In general, Anna van Toor focuses on factory-level issues but it shared its experience at a Turkish subcontractor with its agent, who is also the contact person for other Turkish subcontractors.

In 2018, two FWF audits took place at Anna van Toor's main suppliers in China and Turkey. Since the report of the latter was only shared with Anna van Toor in 2019, the follow-up of this audit will be assessed in next year's Brand Performance Check. For the audit in China, most of the health and safety issues are resolved and the new worker information sheet is posted. For the more difficult findings, like excessive overtime, lack of transparency on attendance records and unpaid statutory holidays, annual leaves, and social security, Anna van Toor could not make progress as the supplier's management did not respond to its questions. Therefore, it planned an FWF Workplace Education Program (WEP) for July 2019.

In 2018, some remaining issues of a 2017 CAP in Turkey were also addressed. Anna van Toor received attendance records of the factory. As the follow-up of this CAP was led by another FWF member, who stopped working with this supplier, Anna van Toor now has to adjust its approach and work more actively with the factory on the follow-up of the CAP.

Recommendation: FWF advises Anna van Toor to actively continue the follow-up on the open issues at its Chinese supplier after the WEP has taken place. It might be necessary to hire a local consultant to make further progress and assist the supplier in developing an action plan for solving the open issues. Furthermore, it is advised to include worker representation in the remediation process. Either to engage workers in identifying and implementing improvements or to verify realised improvements

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.	84%	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: In 2018, Anna van Toor visited production locations responsible for 84% of its total production volume. FWF's checklist for supplier visits was used during these visits. Outcomes of visits are documented in a short report and discussed internally. Suppliers are also visited by agents but as the outcomes of these visits are not documented, these visits do not count towards this indicator.

Recommendation: FWF recommends to document the outcome of visits by agents and ensure checking whether the CoLP is posted is part of every visit.

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 2018, Anna van Toor has collected external audit reports, assessed the quality, created corrective action plans 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.	1	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	Intermediate			3	6	-2
Other risks specific to the member's supply chain are addressed by its monitoring system	Insufficient			-2	6	-2

Comment: For its two Turkish suppliers, Anna van Toor created an email regarding the employment of Syrian refugees. This issue is discussed yearly with Anna van Toor's agent, who is the contact person for the Turkish suppliers. Anna van Toor knows whether Syrian migrant workers are active at the suppliers or not. However, the suppliers do not have a special policy in place regarding Syrian migrant workers. The two active suppliers are subcontractors of Anna van Toor's main supplier in Turkey. Subcontracting is discussed with the Turkish agent twice a year. One of the Turkish suppliers has been audited by FWF in 2018 but Anna van Toor, nor its agent visited the suppliers in 2018 to discuss the policies concerning Syrian migrant workers.

In India, Anna van Toor works with small, family-owned suppliers and audited two out of its three suppliers. Due to quality issues, the brand might stop working with the non-audited supplier. However, in 2018, this supplier still produced for Anna van Toor while no risk mitigation steps were taken.

In China, Anna van Toor sources via agents. In 2018, an FWF audit took place at one Chinese supplier but no risk mitigation steps were taken for other suppliers.

The suppliers in Serbia have been visited by Anna van Toor in 2018 and working conditions have been discussed during these visits.

Anna van Toor visited part of its Portuguese suppliers in 2018. However, no risk mitigation steps were taken at the non-visited suppliers and no special attention was paid to mitigate the risk of non-authorized subcontracting.

The suppliers in Madagascar and Pakistan both have been audited by an external party. For the supplier in Tunisia, no risk mitigation steps were taken in 2018.

Requirement: FWF requires Anna van Toor to take concrete steps to ensure that audits take place in first-tier production locations including all authorized subcontractors in Turkey. Alongside this process, formulating policies on the employment of Syrian refugees in Turkey is a necessary step. This policy should encourage the disclosure of unauthorized subcontractors. Anna van Toor should schedule visits to Turkish suppliers and its known subcontractors at least on an annual basis. When conducting in-person visits, Anna van Toor must notify its suppliers on its policies concerning Syrian migrant workers.

Anna van Toor's monitoring system should identify and address high-risk issues that are specific to its sourcing practices in other countries. For China it is advised to discuss excessive overtime risks with the suppliers' management, preferably during on-site visits. With regard to freedom of association, Anna van Toor could look into active unions in the area. In India, discussions with suppliers' management on gender based discrimination and dormitory workers are also recommended. FWF provides policies and country-specific requirements for Member companies. Priorities in remediation efforts are guided by these policies.

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: In 2018, Anna van Toor actively cooperated with another FWF member in the follow-up of a 2017 audit in Turkey. The other member had the lead in the follow-up process and kept Anna van Toor updated via email.

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. FWF has defined minimum monitoring requirements for production locations in low-risk countries.	Documentation of visits, notification of suppliers of FWF membership; posting of worker information sheets, completed questionnaires.	2	3	0

Comment: Anna van Toor or an agent has visited all suppliers in low-risk countries. For five suppliers in low-risk countries, the worker information sheet is not posted and one supplier has not signed and returned the questionnaire. This means that 98% of Anna van Toor's production in low-risk countries takes place at suppliers that meet the monitoring requirements for low-risk countries.

Requirement: Monitoring requirements need to be fulfilled for production in low-risk countries in order for it to be counted towards the monitoring threshold. All production sites in low-risk countries must:

- Ensure up to date information on the labour conditions in the location either by a regular visit and/or a report by a third party;
- 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 at tail-end production locations (when the minimum required monitoring threshold is met).	No	FWF encourages its members to 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	2	0

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.11 Questionnaire is sent and information is collected from external brands resold by the member company.	Yes, and member has collected necessary information	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.	2	2	0

Comment: 51,1% of Anna van Toor's total production volume comes from external brands resold by Anna van Toor. In 2018, this share increased due to the take-over of a Dutch shop. Anna van Toor included the brands sold at this shop in its external brand list. Anna van Toor works as much as possible with Dutch brands and tries to buy a maximum of 50% of its total production volume at external brands.

Anna van Toor sent the questionnaire to all its external brands. However, not all brands have sent it back. Especially for many newly added brands, the questionnaire is missing as Anna van Toor only bought the rest stock of the store and has not been working with the external brands directly yet. Additionally, Anna van Toor actively collects CSR information (reports, memberships, etc) of its external brands.

Anna van Toor works with an overviews sheet of its external producers, keeping track of whether the questionnaire is sent back, including CSR information, and, when applicable, the CSR ranking of Rank a Brand. The sheet also includes a column on necessary next steps, mainly focusing on missing information.

Purchasing staff is aware of the missing questionnaires and information and follows-up with the external brands.

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

Comment: Many of Anna van Toor's external producers are working with BSCI and other initiatives but none of these are FWF or FLA members.

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

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: 35

Earned Points: 22

3. COMPLAINTS HANDLING

BASIC MEASUREMENTS	RESULT	COMMENTS
Number of worker complaints received since last check	0	At this point, FWF considers a high number of complaints as a positive indicator, as it shows that workers are aware of and making use of the complaints system.
Number of worker complaints in process of being resolved	0	
Number of worker complaints resolved since last check	0	

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.1 A specific employee has been designated to address worker complaints	Yes	Followup is a serious part of FWF membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	1	1	-1

Comment: At Anna van Toor all production staff has their own suppliers for which they are responsible to address worker complaints if there are any. In addition, the Head of Production keeps an overview of complaints if there are any.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.2 Member company has informed factory management and workers about the FWF CoLP and complaints hotline.	Yes	Informing both management and workers about the FWF Code of Labour Practices and complaints hotline is a first step in alerting workers to their rights. The Worker Information Sheet is a tool to do this and should be visibly posted at all production locations.	Photos by company staff, audit reports, checklists from production location visits, etc.	2	2	-2

Comment: Anna van Toor requires all production locations to return a picture of the posted Worker Information Sheet. In addition, everyone visiting on behalf of Anna van Toor is asked to take a picture of the Worker Information Sheet. However, in four suppliers the Worker Information Sheet has not been posted. At one of these suppliers, only test orders were placed in 2018 and Anna van Toor will not continue to work with this supplier. With another supplier, cooperation is not going well and Anna van Toor might stop production at all. For the remaining two suppliers without Worker Information Sheet, Anna van Toor actively follows-up to make sure the Worker Information Sheet will be posted.

Requirement: Anna van Toor must ensure that the Worker Information Sheet, including contact information of the local complaints handler of FWF, is posted in factories in a location that is accessible to all workers. Anna van Toor should check by means of a visit whether the Worker Information Sheet is posted in the factories.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.3 Degree to which member company has actively raised awareness of the FWF CoLP and complaints hotline.	0%	After informing workers and management of the FWF CoLP and the complaints hotline, additional awareness raising and training is needed to ensure sustainable improvements and structural worker-management dialogue.	Training reports, FWF's data on factories enrolled in the WEP basic module. For alternative training activities: curriculum, training content, participation and outcomes.	0	6	0

Comment: Over the last three years, Anna van Toor did not take steps to actively raise awareness of the FWF CoLP and complaints hotline.

Requirement: FWF requires Anna van Toor to actively raise awareness about the FWF Code of Labour Practices and FWF complaint hotline. Anna van Toor should ensure good quality systematic training of workers and management on these topics. To this end, Anna van Toor can either use FWF's Workplace Education Programme (WEP) basic module or implement training related to the FWF CoLP and complaint hotline through service providers or brand staff. FWF's guidance on training quality standards is available on the Member Hub.

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: 9

Earned Points: 3

4. TRAINING AND CAPACITY BUILDING

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.1 All staff at member company are made aware of FWF membership.	Yes	Preventing and remediating problems often requires the involvement of many different departments; making all staff aware of FWF membership requirements helps to support cross-departmental collaboration when needed.	Emails, trainings, presentation, newsletters, etc.	1	1	0

Comment: Anna van Toor publishes a monthly newsletter for all staff. In addition, the company organises training for sales staff to share what Anna van Toor does with FWF and a presentation about factory visits. FWF membership is also included in the introduction booklet for new sales staff. Furthermore, FWF membership is presented to all staff during the yearly presentation of the collections at Anna van Toor.

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: FWF requirements are shared regularly within the production department. Everyone takes responsibility for their own suppliers.

In 2018, staff attended the FWF annual conference and a living wage webinar.

Recommendation: A training session on labour standards can be held for purchasing staff. FWF can support or facilitate in providing training. In addition, it is recommended to actively take part in training opportunities FWF offers such as FWF seminars, webinars, and member stakeholder meetings.

Furthermore, FWF encourages purchasing staff or agents to observe factory audits by FWF audit teams to learn about the audit process and to be able to better follow-up on corrective action plans.

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: Agents have been trained on FWF membership and requirements. They are actively involved in supporting CoLP implementation.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.4 Factory participation in training programmes that support transformative processes related to human rights.	0%	Complex human rights issues such as freedom of association or gender-based violence require more in-depth trainings that support factory-level transformative processes. FWF has developed several modules, however, other (member-led) programmes may also count.	Training reports, FWF's data on factories enrolled in training programmes. For alternative training activities: curriculum, training content, participation and outcomes.	0	6	0

Recommendation: FWF recommends Anna van Toor to implement training programmes that support factory-level transformation such as establishing functional internal grievance mechanisms, improving worker-management dialogue and communication skills or addressing gender-based violence. Training assessed under this indicator should go beyond raising awareness and focus on behavioural change and long-term structures to improve working conditions. To this end, Anna van Toor can make use of FWF's Workplace Education Programme communication (in Turkey) or violence prevention (in India) module or implement advanced training through service providers or brand staff. FWF guidance on good quality training is available on the Member Hub.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.5 Degree to which member company follows up after a training programme.	No training programmes have been conducted or member produces solely in low-risk countries	After factory-level training programmes, complementary activities such as remediation and changes on brand level will achieve a lasting impact.	Documentation of discussions with factory management and worker representatives, minutes of regular worker-management dialogue meetings or anti-harassment committees.	N/A	2	0

TRAINING AND CAPACITY BUILDING

Possible Points: 11

Earned Points: 5

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: Anna van Toor resents the questionnaire every three years to its suppliers to ensure it stays updated about the supplier information.

During the Brand Performance Check, it became clear that two subcontractors were missing in Anna van Toor's supplier list. These were added directly after the Check. As explained at indicator 1.3, Anna van Toor could not include one Polish supplier in the FWF Database as the order was placed without the member knowing and the supplier is not willing to share information with Anna van Toor. Anna van Toor's main supplier in Poland stressed that this was a one time order and that it will not happen again.

Requirement: After the end of each financial year, Anna van Toor must confirm its list of production locations and provide relevant financial data. A complete list means ALL production locations are included of all production processes the member uses in the stages after fabric production.

Recommendation: FWF recommends Anna van Toor to make more explicit to its suppliers that they should always be informed when (part of) the production is moved to another supplier.

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: For each supplier, Anna van Toor stores all relevant documents on its server. Other information on the compliance status of suppliers is shared among relevant staff verbally and via emails, in an informal way.

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: Anna van Toor communicates about FWF at its website, brochures, magazine, TV screens in shops, and via social media.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
6.2 Member company engages in advanced reporting activities	Published Brand Performance Checks, audit reports, and/or 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: Due to a mistake at the e-commerce department, last year's Brand Performance Check report was published on Anna van Toor's website after this year's Brand Performance Check.

Recommendation: FWF recommends Anna van Toor to publish one or more of the following reports on its website: Brand Performance Check, audit reports, supplier information. Good reporting by members helps to ensure the transparency of the member and FWF's work.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
6.3 Social Report is submitted to FWF and is published on member company's website	Complete and accurate report submitted to FWF AND 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: Due to a mistake at the e-commerce department, the 2018 social report was published on Anna van Toor's website after the Brand Performance Check.

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 evaluated by relevant staff and top management. This is done in an informal, ad-hoc way. Supplier feedback is taken into account in these evaluations.

The Brand Performance Check report is used to set priorities for the next year.

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.	25%	In each Brand Performance Check report, FWF may include requirements for changes to management practices. Progress on achieving these requirements is an important part of FWF membership and its process approach.	Member company should show documentation related to the specific requirements made in the previous Brand Performance Check.	2	4	-2

Comment: In last year's Brand Performance Check, six requirements were included:

- Indicator 1.5 > Systematic social compliance evaluation: no progress was made on this in 2018.
 - Indicator 1.7 (in progress)> Root cause analysis of excessive overtime: for the 2017 audit, Anna van Toor received the attendance records which did not show excessive overtime. Since Anna van Toor is not convinced that the issue is resolved, the brand continues to follow-up.
 - Indicator 1.11 (in progress)> Taking steps towards living wages: in 2018, Anna van Toor collected the living cost and wage data of some workers of its Serbian supplier.
 - Indicator 2.7 (in progress)> compliance with the risk policy on Syrian migrant workers: Anna van Toor created an email for its Turkish suppliers on this issue.
 - Indicator 4.4> Awareness raising on the FWF CoLP and complaints hotline: no improvements made on this in 2018.
 - Tail end requirements> in 2018, the tail-end requirements are still not met.
- For three of the six requirements, Anna van Toor made some progress but none of the requirements are met yet.
-

EVALUATION

Possible Points: 6

Earned Points: 4

RECOMMENDATIONS TO FWF

- Anna van Toor recommends FWF to make its policy documents and country studies shorter, more concrete, and more accessible.
- Anna van Toor raised that it is difficult to find the Living wage benchmarks at FWF's website.
- Anna van Toor would like to be able to use only one login for all FWF's digital platforms.
- Anna van Toor raised that it could be useful to consider using order amounts instead of, or in addition to FOB figures.

SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	24	47
Monitoring and Remediation	22	35
Complaints Handling	3	9
Training and Capacity Building	5	11
Information Management	4	7
Transparency	5	6
Evaluation	4	6
Totals:	67	121

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

55

PERFORMANCE BENCHMARKING CATEGORY

Good

BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

12-06-2019

Conducted by:

Linda van IJendoorn

Interviews with:

Chantelle van Toor - Head of design & end responsible

Karin Hooijmeijer - Head of production

Iris Moss - Production manager

Lisette van Toor - Marketing & Communication