



BRAND PERFORMANCE CHECK

ROOTS for Safety B.V.

PUBLICATION DATE: APRIL 2019

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

ROOTS for Safety B.V.

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

MEMBER COMPANY INFORMATION	
Headquarters:	Hoogvliet, Netherlands
Member since:	01-07-2013
Product types:	Workwear
Production in countries where FWF is active:	China
Production in other countries:	Germany, Italy, Poland
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	99%
Benchmarking score	57
Category	Good

Summary:

ROOTS for Safety has shown progress and met most of FWF's performance requirements. ROOTS for Safety surpasses FWF's monitoring threshold for members after three years of membership by monitoring 99% of production. With a benchmarking score of 57, ROOTS for Safety has been awarded the category 'Good'.

In 2018, ROOTS for Safety expanded product range to protective wear for industries beyond the oil and gas industry. ROOTS for Safety increased the monitoring of their suppliers' compliance to their social, environmental and technical requirements, in order to increase certifications and safety standards to inform end user of their new product range. ROOTS for Safety also signed an agreement with their main supplier in China, to store stock within the factory. With a constant stock at their main supplier, ROOTS for Safety, has managed to increase the accuracy of their forecasting system for their planning. Production can now be done throughout the year as orders do not dictate the time pressure for suppliers. Deadlines are more flexible, and therefore production can easily be shifted into the low season. This is predominantly decided by the supplier so long as the agreed number of products remains always in stock. Whilst a verification audit has not yet concluded the impact this will have to the factories planning, ROOTS for Safety believes that this new system should reduce the overtime burden.

ROOTS for Safety can still make improvements in addressing wages with their main supplier. ROOTS for Safety needs to analyse the between its buying prices and wage levels in production locations. Using the tools provided by FWF such as the Wage ladder and costing sheets, ROOTS for Safety can begin to document, monitor, negotiate and evaluate the improvements at its suppliers as well as the costing sheets per country.

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.	89%	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: ROOTS for Safety works with one main supplier in China which accounts for 89% of its total production capacity. The remainder of the production is split across two subcontractors who do the binding and embroidery for a small selection of garments and three low-risk suppliers that produce more high-level technical products.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.1b Percentage of production volume from production locations where member company buys less than 2% of its total FOB.	3%	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, 3% of ROOTS for Safety's production volume came from production locations where member company buys less than 2% of its total FOB.

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.	91%	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 2018, 91% of ROOTS for Safety's production volume came from production locations where a business relationship has existed for at least five years. ROOTS for Safety strongly believes in the importance of maintaining long term relationships with suppliers in order to assure better collaboration and improve consistency in production quality.

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.	2nd years + member and no new production locations selected	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.	N/A	2	0

Comment: ROOTS for Safety did not have any new production locations in 2018, however showed document proof that all other existing production locations signed and returned the questionnaire with the Code of Labor Practices before first bulk orders were 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: ROOTS for Safety uses the help of consultants to source new locations. As part of their new check list for selecting new production locations, all potential locations must be visited first. During this visit, some basic information is gathered including other customers producing at the suppliers, and if there are any existing audits. The current working conditions are assessed uses the FWF health and safety checklist. The final decision to source at new suppliers is made after this prior evaluation by the management team, including CSR person. ROOTS for Safety's CSR person arranges quarterly reminders to follow up on existing suppliers, including discussions of on going remediation processes.

Recommendation: FWF recommends ROOTS for Safety to further integrate the assessment of labour standards at potential new suppliers into their decision-making in a systematic way. This can include adding tools such as the FWF Country studies conducted in order to relate country issues to selection of new supplier.

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: The majority of ROOTS for Safety garments are produced at their main supplier in China. Because of the technical nature of their products, ROOTS for Safety has a production manager based in China who is responsible for assessing compliance with production quality. Their production manager works together with the CSR and QHSE manager, based at the headquarters who is responsible for the remainder of the suppliers.

Each factory is individually evaluated based on total orders, partial delivery, delays, prices monitored, quality management system, quality of product and invoicing. Additionally, compliance with Code of Labour Practices is evaluated as part of the factory social and environmental standards assessment per supplier. ROOTS for Safety checks yearly on posted CoLP in factories, and uses quarterly compliance checks to discuss CAPs as well as any ongoing quality issues at the factories. This evaluation is being done at individual supplier basis, and information is stored separately in either meeting minutes, or spreadsheets. The evaluation of compliance with Code of Labour Practices however is not completed in a systematic way, and sometimes ad-hoc based on ongoing issues at factory. ROOTS for Safety does not yet have a systematic overview of compliance of its supplier, which is documented over time. The evaluation outcomes do not formally influence ROOTS for Safety's production decisions yet.

Recommendation: FWF encourages ROOTS for Safety 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. Similarly, developing a comparison of suppliers outcomes can help track progress at each supplier, and help identify which production location is best to reward.

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: In 2018, ROOTS for Safety evaluated their product range which resulted in ending some lines, in order to streamline their own forecasting. Furthermore, ROOTS for Safety made an agreement with their main Chinese supplier to store stock at the factory. ROOTS for Safety now has a constant stock of high-in-demand ready made products in stock at the factory. The production manager and logistics manager work closely together with their forecasting system to assess exact demand for their products.

ROOTS for Safety is able to work with flexible deadlines based on customer orders because of their business nature. With the new insight and better overview of available products in stock, ROOTS for Safety feels like they have reduced production pressure on suppliers because they can manage to be more flexible with planning and with lead times for suppliers.

Recommendation: FWF advises ROOTS for Safety to reach out to other clients at the supplier to try resolve this issue. Furthermore, ROOTS for Safety can integrate an overview of factory capacities into their planning system to be able to better forecast peak production times. A good production planning system needs to be established based on the production capacity of the factory for regular working hours and information on working minutes per style.

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: Excessive overtime was found in the audit conducted by FWF in November 2018, ROOTS for Safety only received the report in January 2019 therefore has not yet managed to fully follow up on progress of individual findings.

ROOTS for Safety had an initial discussion with factory management over the audit findings and new CAP. In prior audit findings, ROOTS for Safety has had discussion with its supplier on how to reduce overtime. The company believes with the help of the in-house stock and better planning overview set up in 2018, there should be a decrease in overtime. ROOTS for Safety is now more flexible with their production plan, which gives the factory more freedom to decide when orders should be placed, and production can be shifted to low season to avoid production pressure. ROOTS for Safety feels like they are not the main cause of overtime at their supplier but rather it is caused by other customers who place orders late and have last minute changes to their orders.

Recommendation: FWF recommends ROOTS for Safety to conduct further analysis at suppliers on overtime across the 12 months of the year to find a link between their dates for orders and occurrence of excessive overtime. Besides discussing it with the supplier and assessing root causes, FWF strongly recommends ROOTS for Safety to actively take measures when excessive overtime is found. Taking measures to ensure that the brand knows and shows whether excessive overtime takes place at a supplier is key in resolving the issue. Measures such as regular checks by the local technician, documents checking and interviewing workers help assess whether excessive overtime takes place.

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: ROOTS for Safety gets a purchasing price however is not aware of the cost breakdown per main garment. Based on own internal knowledge and experience, ROOTS for Safety can calculate estimates for these costs however these are not verified with suppliers. For their more technical products produced in Europe, ROOTS for Safety is aware of labour minutes and price breakdown as well as costs for material and finishing costs. However this is for a very small range of high standards products that need to meet the European safety certifications. ROOTS for Safety has not yet made further analysis based on this knowledge and has not formally stored this information.

Requirement: ROOTS for Safety needs to demonstrate an understanding of the link between buying prices and wage levels, to ensure their pricing allows for the payment of the legal minimum wage.

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 2018, there was an increase in the local minimum wage in which the audit at the factory revealed a delayed increase in wages. Production manager based in China was able to get hold of more information on wages for 2018, where the factory provided some worker's payslips from the start of the new year as evidence of increased wages that were above the legal minimum wage and the issue resolved.

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.	Insufficient	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	6	0

Comment: In 2018, ROOTS for Safety did not prioritise the assessment of root causes for wages that are lower than living wages. Wages has been a discussion with their main supplier in China however the member feels like the supplier is paying higher wages relative to surrounding factories. This is based on long term relationship with supplier and information collected based on working in China for a while. This comparison however is yet to be confirmed and living wages not established. Furthermore, living wages has not been discussed with other suppliers yet.

Requirement: ROOTS for Safety must assess the root causes of wages that are lower than living wages, taking into account its leverage and effect of its own pricing policy. ROOTS for Safety is expected to take an active role in discussing living wages with its suppliers. The FWF wage ladder can be used as a tool to implement living wages, to document, monitor, negotiate and evaluate the improvements at its suppliers as well as the costing sheets per country.

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: ROOTS for Safety did not determine wage increase at suppliers yet.

Requirement: ROOTS for Safety should analyse what is needed to increase wages and develop a strategy to finance the costs of wage increases. To support 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	0%	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.	0	3	0

Comment: ROOTS for Safety has not set a target wage for their suppliers.

Requirement: ROOTS for Safety is expected to begin setting a target wage for its production locations.

PURCHASING PRACTICES

Possible Points: 45

Earned Points: 18

2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	89%	
% of production volume where monitoring requirements for low-risk countries are fulfilled	10%	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.	Yes	
Requirement(s) for next performance check		
Total of own production under monitoring	99%	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: The Corporate Social Responsibility (CSR) & Quality, Health, Safety, Environment (QHSE) Manager is ultimately responsible to follow up on problems identified by the monitoring system. In practice, the production manager based in China is responsible for following up directly with the main suppliers on remediation.

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: ROOTS for Safety shares audit reports and CAPs with the factory and progress is monitored during factory visits by the production manager based in China, this information is shared and discussed with CSR manager via regular calls and email.

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: ROOTS for Safety received the audit report in January, therefore CAP has still yet to be properly followed up on. ROOTS for Safety actively shared the CAPs of each audit as a base to follow up on corrective actions. Timelines are established together with factory management. Production manager based in China visited the factory to discuss the most urgent findings of the CAP, including safety issues which were resolved, evidence of this was shown by documents provided by factory as well as photos of improvements within the factory.

Recommendation: To facilitate remediation, ROOTS for Safety could consider:

- Hire a local consultant to assist factory in developing an action plan and to assist factory management in investigating root causes.
- Organise supplier seminars.
- Provide factory training.
- Share knowledge/material.
- Providing financial support to the supplier for implementing 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.	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: ROOTS for Safety visited all their suppliers in 2018.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.6 Existing audit reports from other sources are collected.	No existing reports/all audits by FWF or FWF member company	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.	N/A	3	0

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.7 Compliance with FWF risk policies.	Average score depending on the number of applicable policies and results	Aside from regular monitoring and remediation requirements under FWF membership, countries, specific areas within countries or specific product groups may pose specific risks that require additional steps to address and remediate those risks. FWF requires member companies to be aware of those risks and implement policy requirements as prescribed by FWF.	Policy documents, inspection reports, evidence of cooperation with other customers sourcing at the same factories, reports of meetings with suppliers, reports of additional activities and/or attendance lists as mentioned in policy documents.	3	6	-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	Policies are not relevant to the company's supply chain			N/A	6	-2
Other risks specific to the member's supply chain are addressed by its monitoring system	Intermediate			3	6	-2

Comment: ROOTS for Safety is aware of the risks specific to its production in Europe and continues to discuss any potential risk at suppliers during visits. These include the issues of low wages in Poland as well as

ROOTS for Safety acknowledges the risks of the risk for excessive overtime, freedom of association, issues around social insurances in China and mostly the government influence on factory decisions. However ROOTS for Safety, is strongly in favour for the working conditions in China and feels that is a relatively safe production location, having gained years of experience of it as their main sourcing location. ROOTS for Safety had an understanding of the general risks that come with working in China including workers wanting to work overtime because they can save some of the days to take during holiday. Whilst other workers live in poor conditions in factory dorms because they only come to these towns to work. ROOTS for Safety is adamant that this is not the case for their suppliers, and wants to make sure that workers go home after working hours. ROOTS for Safety has found difficulty discussing the compensation of overtime in the form of longer holidays because this is hard to verify. More discussions are being had with their supplier on the topic.

ROOTS for Safety has also has discussions with suppliers on social insurances, which ultimately resulted in more information in the difference between the rural and urban workers. Factory informed ROOTS for Safety that often times rural workers already have insurances covered by local government where as urban workers tend to opt for social insurances provided by their employer. ROOTS for Safety is yet to further look into this specific information.

Recommendation: ROOTS for Safety has made the first steps by identifying risks and starting to discuss them with suppliers, ROOTS for Safety can broaden this knowledge by participating in country specific trainings and/or webinars. Furthermore, ROOTS for Safety can encourage suppliers to also participate in webinars on high-risk issues in order to gain more guidance on how to mitigate risks and on additional measures to integrate in their monitoring systems.

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: In 2018, ROOTS for Safety did not have shared production locations another FWF member company.

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: ROOTS for Safety fulfilled the monitoring requirements for its production volume in low-risk countries. The production location in low-risk country was visited; during visits suppliers were informed of FWF membership and completed CoLP questionnaires were returned before production orders were placed.

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).	Yes	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.	2	2	0

Comment: ROOTS for Safety monitored 99% of their production capacity.

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
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
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: 27

Earned Points: 19

3. COMPLAINTS HANDLING

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

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

Comment: The CSR & QHSE Manager is ultimately responsible to follow up on any worker complaints. In practice, the production manager based in China would support this work by engaging directly with the factory.

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: The CSR & QHSE asks each supplier for a new picture of the Worker Information Sheet posted in the factory annually. Additionally, when staff members visit the suppliers, they also check to ensure it is posted. Company could demonstrate during the performance check.

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.	90%	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.	6	6	0

Comment: ROOTS for Safety held two Workplace Education Programme trainings at its main suppliers in China in 2017.

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: 9

4. TRAINING AND CAPACITY BUILDING

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

Comment: ROOTS for Safety shares information on their FWF membership with staff of their using internal newsletters. Information including when the brand performance check happens and its outcome are included in such updates. Furthermore, ROOTS for Safety distributes the FWF monthly newsletter with all the contact points including their sales staff to inform them of ongoing activities that may be interesting to further learn and share with customers.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.2 All staff in direct contact with suppliers are informed of FWF requirements.	Yes	Sourcing, purchasing and CSR staff at a minimum should possess the knowledge necessary to implement FWF requirements and advocate for change within their organisations.	FWF Seminars or equivalent trainings provided; presentations, curricula, etc.	2	2	-1

Comment: The CSR & QHSE Manager shares the FWF member updates with relevant staff at ROOTS for Safety, including Marketing, Purchasing and Sales teams. In 2018, the CSR & QHSE Manager and the Production Manager based in China arrange more regular discussions over FWF requirements. This was part of their quarterly discussions over compliance issues with their Chinese supplier.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices.	Member does not use agents/contractors	Agents have the potential to either support or disrupt CoLP implementation. It is the responsibility of member company to ensure agents actively support the implementation of the CoLP.	Correspondence with agents, trainings for agents, FWF audit findings.	N/A	2	0

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.4 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

Comment: In 2018, ROOTS for Safety suppliers did not participate in other training programmes that support transformative processes related to human rights.

Recommendation: FWF recommends members 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 members can make use of FWF's Workplace Education Programme communication or violence prevention 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.	Active follow-up	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.	2	2	0

Comment: ROOTS for Safety had a follow up discussion with supplier after the training to discuss the training report. The suppliers were generally happy about the training, as were the workers who were much more positive about taking part in the training. ROOTS for Safety plans to have another training to allow more workers to take part in the Workplace Education Programme trainings.

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: ROOTS for Safety demonstrated efforts to identify and register all active production locations in the database for the financial year including their correct FOB percentages.

ROOTS for Safety has an agreement with its suppliers that subcontracting is not permitted unless otherwise discussed. The technical nature of the product means that ROOTS for Safety has strict follow up policies to make sure the product does not leave the factory, and assure the quality is consistent. ROOTS for Safety assumes that any change in quality in the product is one indicator of potential subcontracting, which has not yet happened. However, ROOTS for Safety is largely dependant on production manager in China who does regular unannounced visits and uses the FWF audits to detect any subcontractors, which are then added to the supplier register.

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: In 2018, the CSR & QHSE Manager and Production manager formalised their quarterly update meetings in which conditions and improvements at the main supplier in China were discussed. Updates on CAPs are also shared during these discussions. The CSR Manager shares relevant information on suppliers with the relevant teams at the headquarters during staff meetings or more generally via their internal newsletter.

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: ROOTS for Safety meets the FWF Communications Policy both on its website as well as external communication via their main distributor catalogue of Trital Safety BV brand.

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: ROOTS for Safety publishes its Brand Performance Checks on its website.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
6.3 Social Report is submitted to FWF and is published on member company's website	Complete and accurate report submitted to FWF	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.	1	2	-1

Comment: ROOTS for Safety has submitted its Social Report to FWF.

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: The CSR & QHSE Manager discusses FWF membership with top management regularly. Top management requests updates on audit findings, remediation progress as well as WEP training outcomes during these meetings. Management continues to support FWF membership, as it assists ROOTS for Safety with addressing social compliance issues at its suppliers during visits.

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.	40%	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 2018, ROOTS for Safety resolved three out of the eight requirements given in the Brand Performance Check. ROOTS for Safety has rectified their communication policy to assure that their retailer and distributors correctly communicate FWF membership linked to ROOTS for Safety. Furthermore, ROOTS for Safety 's CSR & QHSE Manager streamlined communication with other employees in direct contact with suppliers. Specifically the production manager based in China. Trainings and progress of remediation of CAPS at suppliers are discussed as part of a company quarterly supplier update. FWF requirements and commitments are incorporated in the update meetings.

With the production manager based in China, more aware of FWF requirements ROOTS for Safety is more aware of how to identify the risks within the regions that they produce. Specifically for China where 90% of their production takes place, ROOTS for Safety is more diligent of the potential risks around them even though they are not yet risen at their supplier. ROOTS for Safety is working on creating a more systematic approach to integrating social compliance into their business processes and decision-making.

Lastly, ROOTS for Safety still needs to develop a demonstrable pricing policy where the member knows the labour cost of all products and which allows the payment of at least legal minimum wages in production countries. ROOTS for Safety is expected to take an active role in discussing living wages with its suppliers.

EVALUATION

Possible Points: 6

Earned Points: 4

RECOMMENDATIONS TO FWF

SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	18	45
Monitoring and Remediation	19	27
Complaints Handling	9	9
Training and Capacity Building	5	11
Information Management	4	7
Transparency	4	6
Evaluation	4	6
Totals:	63	111

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

57

PERFORMANCE BENCHMARKING CATEGORY

Good

BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

25-03-2019

Conducted by:

Sandra Gonza

Interviews with:

Theo de Vliegh, Managing Director

Marco Kremers, CSR and QHSE Manager

Jean-Pierre Tabruyn, Production Manager

Paul van der Stap, Logistics