



## BRAND PERFORMANCE CHECK

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Bel&Bo-Fabrimode NV

this report covers the evaluation period 01-02-2018 to 31-01-2019

## ABOUT THE BRAND PERFORMANCE CHECK

Fair Wear Foundation believes that improving conditions for apparel product location workers requires change at many levels. Traditional efforts to improve conditions focus primarily on the product location. FWF, however, believes that the management decisions of clothing brands have an enormous influence for good or ill on product location conditions.

FWF's Brand Performance Check is a tool to evaluate and report on the activities of FWF's member companies. The Checks examine how member company management systems support FWF's Code of Labour Practices. They evaluate the parts of member company supply chains where clothing is assembled. This is the most labour intensive part of garment supply chains, and where brands can have the most influence over working conditions.

In most apparel supply chains, clothing brands do not own product locations, and most product locations work for many different brands. This means that in most cases FWF member companies have influence, but not direct control, over working conditions. As a result, the Brand Performance Checks focus primarily on verifying the efforts of member companies. Outcomes at the product location level are assessed via audits and complaint reports, however the complexity of the supply chains means that even the best efforts of FWF member companies cannot guarantee results.

Even if outcomes at the product location level cannot be guaranteed, the importance of good management practices by member companies cannot be understated. Even one concerned customer at a product location can have significant positive impacts on a range of issues like health and safety conditions or freedom of association. And if one customer at a product location can demonstrate that improvements are possible, other customers no longer have an excuse not to act. The development and sharing of these types of best practices has long been a core part of FWF's work.

The Brand Performance Check system is designed to accommodate the range of structures and strengths that different companies have, and reflects the different ways that brands can support better working conditions.

This report is based on interviews with member company employees who play important roles in the management of supply chains, and a variety of documentation sources, financial records, supplier data. The findings from the Brand Performance Check are summarized and published at [www.fairwear.org](http://www.fairwear.org). The online [Brand Performance Check Guide](#) provides more information about the indicators.

## BRAND PERFORMANCE CHECK OVERVIEW

Bel&Bo-Fabrimode NV

Evaluation Period: 01-02-2018 to 31-01-2019

MEMBER COMPANY INFORMATION	
Headquarters:	Deerlijk, Belgium
Member since:	01-12-2014
Product types:	Fashion
Production in countries where FWF is active:	Bangladesh, Bulgaria, China, India, Romania, Tunisia, Turkey, Viet Nam
Production in other countries:	Albania, France, Hong Kong, Italy, Malaysia, Morocco, Pakistan, Poland, Sri Lanka, Taiwan
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	91%
Benchmarking score	62
Category	Good

## Summary:

Bel&Bo-Fabrimode NV (hereafter Bel&Bo) has shown progress and met most of FWFs' performance requirements. Bel&Bo has monitored 91% of its total production volume, which exceeds FWF's 80% monitoring threshold after the 3rd year of membership. Bel&Bo received a benchmarking score of 62, according to indicators in the FWF Brand Performance Check Guide. Therefore, Bel&Bo remains in the 'good' category.

Bel&Bo has continued to consolidate its supplier base. The company has established a system to identify risks and measure the working conditions of individual suppliers before placing an order. The company has not yet implemented a system to determine and finance wage increases at the factory level.

Bel&Bo monitors working conditions at production locations by commissioning FWF audit teams and by collecting existing audit reports that meet FWF's quality requirements. Bel&Bo has also demonstrated its remediation work in following up on Corrective Action Plans.

There were no worker complaints in factories supplying Bel&Bo in 2018. Bel&Bo has designed a poster to make the Worker Information Sheet more visible to encourage workers to report their issues. The brand initiated and supported the training of workers at several supplying factories in 2018.

FWF encourages Bel&Bo to take a step further in identifying the link between product price and wage level, with the ultimate goal of working towards living wages at its production locations. In order to reduce the risks of adverse impact to undocumented refugee workers in Turkey, Bel&Bo is expected to make extra efforts to limit subcontracting or obtain information from all subcontractors.

## 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.	35%	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: Bel&Bo had demonstrated efforts in consolidating its supplier base. The percentage of the production volume from production locations where it buys at least 10% of production capacity has increased gradually in the last few years. It was 28% in 2017 and increased to 35% in 2018.

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.	62%	FWF provides incentives to clothing brands to consolidate their supplier base, especially at the tail end, as much as possible, and rewards those members who have a small tail end. Shortening the tail end reduces social compliance risks and enhances the impact of efficient use of capital and remediation efforts.	Production location information as provided to FWF.	0	4	0

Comment: The efforts to consolidate the supplier base have also shown in this indicator. The percentage of production in tail-end suppliers has decreased from 68% in 2017 to 62% in 2018.

Recommendation: Bel&Bo has made a notable change in consolidating its supplier base. FWF encourages Bel&Bo to continue making efforts in improving sourcing practice.

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.	54%	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: Bel&Bo continues to work with existing suppliers and establishes stable business relationships with them. As a result, there have been 11 percentage points increase in this indicator within one year.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.3 All (new) production locations are required to sign and return the questionnaire with the Code of Labour Practices before first bulk orders are placed.	Yes	The CoLP is the foundation of all work between production locations and brands, and the first step in developing a commitment to improvements.	Signed CoLPs are on file.	2	2	0

Comment: Bel&Bo has established a comprehensive system to manage documentation acquired from suppliers. The system uses colour coding to facilitate communication between CSR department and production department. The aim of the system is to ensure that all new suppliers need to sign the Code of Labour Practices (CoLP) before an audit is placed.

During the brand performance check, FWF could confirm that the questionnaires and CoLP have been signed in all randomly sampled factories.

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

**Comment:** Prior to placing an order, the CSR manager checks and evaluates the risks of individual suppliers based on the FOB, the availability of their previous audits, self-evaluation report, commitment to FWF Code of Labour Practices and the participation to the Accord (in case the new factory is in Bangladesh). Only when that step is taken, the production department is allowed to place an order. Bel&Bo has a computer-based colour coding system for this practice. If a potential supplier has not sent any of the required documents as mentioned above, the factory is not allowed to become a 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.	Yes	A systemic approach is required to integrate social compliance into normal business processes, and supports good decisionmaking.	Documentation of systemic approach: rating systems, checklists, databases, etc.	1	2	0

**Comment:** Bel&Bo evaluates individual suppliers twice a year in evaluation meetings of the compliance team and the sourcing team. Suppliers that are actively communicating and following up on the CAPs would be in the preferred list to place orders. Suppliers that are not progressing would need more pressure from Bel&Bo. The evaluation of suppliers influences production decisions informally but not at a systematic level.

**Recommendation:** FWF encourages Bel&Bo to further develop a formal system to evaluate and reward suppliers based on their performance in compliance. Bel&Bo could take a step further to share the evaluation results with suppliers to be more transparent.

When there is a need to phase out a supplier due to lack of progress in compliance, Bel&Bo should develop a policy to exit suppliers responsibly and follow the policy accordingly.

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:** Bel&Bo shares its annual production plan with suppliers. Standard lead time is applied to all production locations. Therefore suppliers are always aware of the delivery expectation of Bel&Bo once an order is confirmed. The standard lead time is based on the location of the factory considering the total production time. An additional two to three weeks are added to the standard lead time so that suppliers have more time to deal with unexpected delays. Bel&Bo applies retro-planning to schedule production, which means that the plan is built up starting from the last step of the process.

In 2018, Bel&Bo headquarter has assigned a new position - a production planner - to communicate with suppliers to confirm technical details, chase samples and be informed about order delivery. Bel&Bo believes that this new position has contributed to efficiency both at the headquarter and at the suppliers.

The real capacity of the individual suppliers, factory's regular working hours and the overview of suppliers' planning are not part of Bel&Bo's formal consideration when doing production planning.

**Recommendation:** FWF recommends Bel&Bo to establish a strong production planning system which considers the factory's production capacity, the regular working hours and the factories' own planning. The production planning system should prevent late designs and quantity changes, and help to limit capacity overbook at suppliers. Bel&Bo could involve more internal departments such as design, sales and product management, to have a stronger influence over the whole production planning.

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:** FWF has audited four suppliers of Bel&Bo in 2018. Excessive overtime work (OT) is found at all 4 FWF audited factories. OT was about the average level at the suppliers in China and Bangladesh respectively.

Bel&Bo has not conducted systematic root cause analysis. But it has discussed with individual suppliers on the causes of OT and collected feedback for improvement at the brand level. In 2018, Bel&Bo has appointed a planner as a new position to address issues, which might cause production delay, at the headquarter. The planner is also supposed to improve communication with suppliers to make changes when needed to relieve their production pressure.

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

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.8 Member company 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:** Bel&Bo usually asks two or three suppliers for a quotation and compared prices. If prices do not differ significantly, Bel&Bo always prefers existing suppliers, especially those ones that they have a long-term business relationship. Bel&Bo values the relationship with long-term suppliers and tries not to disappoint them. In some cases, even if the price is higher, Bel&Bo still produces a small amount at suppliers, which had given a quotation.

Although Bel&Bo knows legal minimum wage in production locations, it does not know the link between its buying prices and the wage levels.

**Requirement:** Bel&Bo 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.

**Recommendation:** Bel&Bo is recommended to expand their knowledge of cost break downs of all product groups. One recommendation would be to provide buyers (or other employees involved in price negotiations with suppliers) training on cost breakdown. Bel&Bo could contact its brand liaison at FWF to request support. In addition, Bel&Bo could provide suppliers, which don't use open costing, training on product costing and how to quote prices including (direct and indirect) labour costs. FWF currently organises product costing training sessions in Bangladesh.

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:** According to audit results, one out of four factories did not pay minimum wage. The factory is located in Bangladesh. Bel&Bo responded to the finding by follow up on the Corrective Action Plan. The factory updates the progress regularly. The factory claimed that the minimum wage is now paid according to the most recent report. Bel&Bo has planned to verify the result in the next visit.

One supplier in China did not show authentic wage records to the auditors during the audit. Although there was a delay, Bel&Bo has contacted the factory and tried to engage them to improve transparency.

**Requirement:** If a supplier is not transparent about wages, the member is expected to respond as if minimum wages have not been paid. The member is required to start an investigation into the causes of the incomplete data, discuss this with the supplier and collect evidence of payment of legal minimum wage. Factory visits with a documents check or additional verification by FWF may be needed to verify remediation.

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

Comment: All audited suppliers reported that Bel&Bo's payments were on time.

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: All four audited factories are not yet paying a living wage. Bel&Bo discussed living wage issues with the suppliers as part of the Corrective Action Plan follow up. Most suppliers do not have sufficient knowledge of the concept of a living wage.

Recommendation: FWF advises Bel&Bo to start with suppliers where it has high leverage and long term business relationship. FWF has developed experience with approaches that ensure that production workers in the selected facility take full benefit from the additional amounts that are committed to wage increases. FWF could give companies specific guidance on process rollout on request.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.12 Percentage of production volume from factories owned by the member company (bonus indicator).	None	Owning a supplier increases the accountability and reduces the risk of unexpected CoLP violations. Given these advantages, this is a bonus indicator. Extra points are possible, but the indicator will not negatively affect an member company's score.	Supplier information provided by member company.	N/A	2	0

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:** Bel&Bo has not yet been able to determine and finance wage increases at their production locations. It has planned to work with an intern to conduct research on the topic.

**Requirement:** Bel&Bo 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. Bel&Bo is encouraged to contact the brand liaison in FWF to gain further support.

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: Bel&Bo has not set target wage at its production locations.

Requirement: Bel&Bo is expected to begin setting a target wage for its production locations.

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## PURCHASING PRACTICES

Possible Points: 47

Earned Points: 21

## 2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	37%	
% of production volume where monitoring requirements for low-risk countries are fulfilled	6%	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	91%	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 CSR manager of Bel&Bo is responsible for monitoring working conditions at the supply chain.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.2 Quality of own auditing system meets FWF standards.	Member makes use of FWF audits and/or external audits only	In case FWF teams cannot be used, the member companies' own auditing system must ensure sufficient quality in order for FWF to approve the auditing system.	Information on audit methodology.	N/A	0	-1

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.3 Audit Report and Corrective Action Plan (CAP) findings are shared with factory and worker representation where applicable. Improvement timelines are established in a timely manner.	Yes	2 part indicator: FWF audit reports were shared and discussed with suppliers within two months of audit receipt AND a reasonable time frame was specified for resolving findings.	Corrective Action Plans, emails; findings of followup audits; brand representative present during audit exit meeting, etc.	2	2	-1

Comment: Bel&Bo shares most CAPs and audit reports with factory management timely. Bel&Bo uses the existing CAP and plans timeline with factory management to make implementation plans.

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: Bel&Bo follows up on the Corrective Action Plans (CAPs) regularly. Timeline and priority of follow-up efforts are different based on the different FOB values of the suppliers. If FOB is of high value (more than 1.5%), the follow-up discussion is held monthly. If FOB is medium and low, follow-up discussion is held every three months and six months respectively.



Since joining FWF, Bel&Bo has focused on establishing monitoring systems to facilitate factories to make improvements. Main activities to follow up on CAPs have been communications via email and site visits of the production staff. Verification of CAP improvement is based on trust. The suppliers are required to send photos as evidence to Bel&Bo and describe the change by email.

**Recommendation:** In addition to email communications, Bel&Bo could consider organising a joint training for their suppliers in countries where there are a higher number of suppliers on common audit findings to share experience in remediation and facilitate peer to peer learning.

Bel&Bo has already an established followup system. The next step should be to enhance verification of CAP remediation. The feedback and supportive evidence that is sent by suppliers can be complex and difficult to interpret when unfamiliar with the local laws and expertise. Bel&Bo is recommended to use FWF's local team or other local organisations to verify the supportive evidence.

Whenever possible, Bel&Bo 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.	56%	Formal audits should be augmented by annual visits by member company staff or local representatives. They reinforce to production location managers that member companies are serious about implementing the Code of Labour Practices.	Member companies should document all production location visits with at least the date and name of the visitor.	3	4	0

**Comment:** Bel&Bo has visited a higher percentage of suppliers this year, compared to 52% as mentioned in the previous Brand Performance Check.

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: Bel&Bo collects existing audit reports from suppliers, which are not audited by FWF local teams. FWF had randomly checked 8 factories. All reports were available, quality assessment was conducted, and follow-up on CAPs have been completed.

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	Advanced			6	6	-2
Compliance with FWF Myanmar policy	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on abrasive blasting	Advanced			6	6	-2
Compliance with FWF guidance on risks related to Turkish garment factories employing Syrian refugees	Insufficient			-2	6	-2
Other risks specific to the member's supply chain are addressed by its monitoring system	Intermediate			3	6	-2

**Comment:** Bangladesh: Bel&Bo has joined the Bangladesh Accord on Fire and Building safety in 2018. The company has demonstrated efforts to support factories to meet the requirements of the Accord. Bel&Bo has maintained good documentation on the reports of the Accord and communicated with factories on improvement plans. To prevent the risk of gender-based violence, Bel&Bo has worked with FWF local team to involve some of its suppliers and establish anti-harassment committees. At least one of the anti-harassment committee has shown signs of being functional.

Myanmar: Bel&Bo does not have any suppliers in Myanmar.

Abrasive-blasting: Bel&Bo has a policy on abrasive blasting. All denim suppliers are visited and have signed agreements on not using abrasive-blasting. The production managers have direct discussions with the factories to communicate the policy.

Turkey: There is no official policy on Syrian refugees in Turkey. Bel&Bo has communicated the enhanced monitoring programme requirements to the suppliers. Due to the low FOB (3%) in Turkey, Bel&Bo did not prioritise to visit the suppliers in Turkey. Visiting the suppliers is still on the agenda of Bel&Bo. Majority of the suppliers have posted the Code of Labour Practices. Bel&Bo has developed a new poster with the worker information sheet, and it is in the process of posting it at all production locations.

Other risks: About 55% of the production volume comes from areas where FWF does not have specific risk mitigation policy. Bel&Bo uses FWF country studies and audit reports as a basis to identify risks in various countries. For example, Bel&Bo identified that one of the risks in China was the lack of transparency in wage and working hour records. To mitigate risks, Bel&Bo reiterates the requirements of FWF to the suppliers. Bel&Bo also collects information to identify risks in other countries where FWF is not active. A formal system to mitigate risks is yet to be established.

**Requirement:** Bel&Bo should draft a formal policy on Turkish refugees based on FWF's requirement in the enhanced monitoring programme.

Despite the fact that the production volume (FOB) is low, Bel&Bo should schedule visits to Turkish production locations at least annually to mitigate risks. Production locations, which appear to be at particular risk of violation to Syrian refugees, or at risk of using unauthorised subcontractors, should be audited by FWF.

In addition, Bel&Bo should invite all its production locations to join FWF's supplier seminar to discuss various issues and risks in Turkey.

**Recommendation:** Bel&Bo is recommended to establish a formal system to identify and mitigate risks in countries, where FWF does not have an enhanced monitoring programme. Bel&Bo could use resources from the websites of ILO, ITUC and IndustriAll to collect information on country-specific risks. To mitigate risks, Bel&Bo could work with local labour-friendly organisations or request support from FWF local team. Organising seminars to inform suppliers and share good practice examples could be an effective way towards mitigation of risks.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.8 Member company cooperates with other FWF member companies in resolving corrective actions at shared suppliers.	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, Bel&Bo shares audit reports with other FWF members. In addition, Bel&Bo shares its factory visit report on CAP follow up with other member brands as well.

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% AND member undertakes additional activities to monitor suppliers	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.	3	3	0

Comment: Bel&Bo is producing in low risk countries such as Italy, Poland and France. Over 85% of the production locations located in low-risk countries have been visited by Bel&Bo. All production locations have signed the Code of Labour Practices and posted the Worker Information Sheet 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
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

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

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## MONITORING AND REMEDIATION

Possible Points: 30

Earned Points: 22

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### 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

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:** According to FWF audit reports in 2018, 3 out of 4 audited factories did not post the worker information sheet. Bel&Bo has taken measures to remediate the issue. It has designed a larger size poster of the worker information sheet. It believed a poster would appear more permanent, professional and trustworthy. It would help to gain trust from workers, thus may invite workers to report their complaints. The poster was developed in 2018 and in the process of distributing to all production locations.



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.	16%	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.	4	6	0

**Comment:** About 16% of the production locations have received training of Workplace Education Programme basic module.

**Recommendation:** To inform factory management on FWF's requirements, Bel&Bo is recommended to enrol production locations to use the Factory Guide developed by FWF. The Factory Guide is a web-based tool to inform production locations on international labour standards and FWF's Code of Labour Practices. It is free-of-charge and is currently available in four languages. Link to the Factory Guide: <https://www.fairwear.org/factory-guide/>

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: 7

## 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: A presentation was given to about 500 employees of Bel&Bo in their annual meeting to inform colleagues on FWF. In addition, there is a Q&A document available for people worked in the retail shops.

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: All new staff get an introduction to Bel&Bo's CSR strategy, which includes FWF membership requirements. The sourcing department meets regularly with the CSR department to discuss compliance status at the suppliers. There is an internal 'FWF team' to support and carry out the work of implementing the Code of Labour Practices. In 2018, Bel&Bo has conducted a refresher training on the CSR system to all sourcing staff.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices.	Yes	Agents have the potential to either support or disrupt CoLP implementation. It is the responsibility of member company to ensure agents actively support the implementation of the CoLP.	Correspondence with agents, trainings for agents, FWF audit findings.	1	2	0

**Comment:** New sourcing agents are required to have a meet-and-greet session with the sourcing department and the CSR department to be informed on the requirements of FWF membership. Agents are responsible to send the Corrective Action Plans but are not required to support follow-up. Some intermediaries are also responsible to collect existing audit reports.

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

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.4 Factory participation in training programmes that support transformative processes related to human rights.	11%	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.	2	6	0

**Comment:** About 11% of Bel&Bo's production locations participated in the violence prevention programme in Bangladesh and India. In some cases, Bel&Bo initiated the participation of the factories; in other cases, it encourages the factories and supports the anti-harassment committees to continue progressing.

**Recommendation:** FWF recommends Bel&Bo 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:** Follow-up efforts were made at all seven factories, which are participating in the violence and harassment prevention programme in Bangladesh and India.

**Recommendation:** Bel&Bo is encouraged to stay in frequent contact with its suppliers to encourage them in violence and harassment prevention. When Bel&Bo visits the production locations participating in the programme, it would be reassuring to committee members if Bel&Bo could discuss with them on supports needed at the brand level.

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## TRAINING AND CAPACITY BUILDING

Possible Points: 13

**Earned Points: 8**

## 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:** The FOB data submitted to FWF is accurate. Bel&Bo has demonstrated efforts to identify subcontractors. Bel&Bo was able to show the production location of a randomly selected product. Bel&Bo has a relatively high number of production sites. Not all the production locations were visited every three years. There are still risks of unauthorised subcontracting, which need more mitigation activities.

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

- 1) Production locations in high-risk areas such as Turkey, Bangladesh, India and China need to be visited annually;
- 2) When business relationships with factories are through agents, transparency of production locations is still required;
- 3) Agreements with factories on the use of subcontractors stating clearly that when subcontractors are used, they are included in the monitoring system and information is shared on the subcontracted production process;
- 4) Tail-end production locations need to be visited at least once every three years. The worker information sheet needs to be posted in all production locations.

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: The CSR department communicates with sourcing staff through an internal data system. Sourcing department uses the information as an input to learn about working conditions at the factories. Sourcing staff also collects and reports back to the CSR department through the same system.

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## INFORMATION MANAGEMENT

Possible Points: 7

Earned Points: 4

## 6. TRANSPARENCY

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
6.1 Degree of member company compliance with FWF Communications Policy.	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

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: The Brand Performance Check report has been published on Bel&Bo's 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 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: Social Report is submitted to FWF and is published on member company's website

## TRANSPARENCY

Possible Points: 6

Earned Points: 5

## 7. EVALUATION

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

Comment: Bel&Bo has an internal team to work on FWF's requirements. The internal team includes two management staff members. The CSR manager is able to raise issues in the board meeting every Monday when necessary.

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.	80%	In each Brand Performance Check report, FWF may include requirements for changes to management practices. Progress on achieving these requirements is an important part of FWF membership and its process approach.	Member company should show documentation related to the specific requirements made in the previous Brand Performance Check.	4	4	-2

Comment: There were two requirements in the previous brand performance check:

- 1) Audits are required at all factories in Bangladesh, even if they fall in the tail-end category (indicator 2.4)  
In 2018, Bel&Bo has monitored almost all factories in Bangladesh (99.6%).
- 2) All production locations are inspected for building and fire safety and the correction action plans are being followed up.  
In 2018, Bel&Bo signed the Bangladesh Accord on Fire and Building Safety, which ensures that all production locations are inspected and working on building and fire safety.

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## EVALUATION

Possible Points: 6

Earned Points: 6

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## RECOMMENDATIONS TO FWF

## SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	21	47
Monitoring and Remediation	22	30
Complaints Handling	7	9
Training and Capacity Building	8	13
Information Management	4	7
Transparency	5	6
Evaluation	6	6
Totals:	73	118

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

62

PERFORMANCE BENCHMARKING CATEGORY

Good

## BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

18-06-2019

Conducted by:

Juliette Li; Emma Conos

Interviews with:

Tine Buysens, CSR manager

Michel Delfosse, CEO

Annick Tack, Management Assistant / FWF admin

Ine Windels, Sourcing Manager / FWF team

Sabine Brunein, QC Manager

Luc Van Vyve, Accounting Manager