



# BRAND PERFORMANCE CHECK

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## Uniform Brands

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

## ABOUT THE BRAND PERFORMANCE CHECK

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

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

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

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

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

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

# BRAND PERFORMANCE CHECK OVERVIEW

## Uniform Brands

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

MEMBER COMPANY INFORMATION	
Headquarters:	Doetinchem, Netherlands
Member since:	01-05-2008
Product types:	Workwear
Production in countries where FWF is active:	Bangladesh, China, Tunisia
Production in other countries:	Hungary, Portugal
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	96%
Benchmarking score	50
Category	Good

## Summary:

Uniform Brands B.V. has met most of FWF's performance requirements in 2018. With a monitoring percentage of 96%, Uniform Brands meets the required monitoring threshold for members after three years of membership. With a score of 53 points, Uniform Brands falls in the 'Good' category.

Uniform Brands' main production facility is in Tunisia, with two satellite production locations in the region to support its production. A considerable amount also comes from factories in low-risk countries Hungary and Portugal. In 2018, it sourced small production volumes from two Chinese suppliers and two Bangladeshi suppliers. Uniform Brands has long-term relationships with most of these suppliers.

For several years, Uniform Brands remained at the same score level of the Brand Performance Check without making significant improvements compared to previous years. In 2017, FWF made requirements for Uniform Brands to follow up on several issues, which did not result in sufficient progress and resulted in a lower score in 2018. FWF, therefore, urges Uniform Brands to follow up more actively on the requirements included in the Brand Performance Check reports.

Despite the fact that Uniform Brands has only very small production at two Bangladeshi suppliers, the brand has continued to source from these suppliers for several years now. During those years, Uniform Brands did not comply with the FWF Enhanced Monitoring Programme for Bangladesh. Uniform Brands took steps this year to collect audits to assess the factory standards and has committed to exiting one of the factories in 2018, but did not undertake additional activities to mitigate and remediate any health and safety issues. FWF requires Uniform Brands to comply with the Enhanced Monitoring Programme and other indicators for repeated non-compliance.

## 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:** Uniform Brands has one main supplier in Tunisia from which it sources most of its production. It uses two Tunisian satellite locations to support this main production facility. It has another supplier in Hungary, in which 2018 will be the last year of production. Leverage at its Tunisian and Hungarian partners is between 40%-100%. Furthermore, Uniform Brands sources from factories in China and Bangladesh where it only has low leverage (

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.	4%	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:** Uniform Brands sources small production orders from two Chinese and two Bangladeshi factories. These factories make specific products for Uniform Brands and cannot be easily exited for consolidation purposes as these orders are also customer specific.

**Recommendation:** FWF recommends the member to consolidate its supply base by limiting the number of production locations in its 'tail end'. To achieve this, members should determine whether production locations where they buy less than 2% of their FOB are of strategic relevance. Shortening the tail will reduce the social compliance risks the member is exposed to and will allow the member to improve working conditions in a more efficient and effective way.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.2 Percentage of production volume from production locations where a business relationship has existed for at least five years.	87%	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: Uniform Brands values long-term relationships and has such relationships with most of its suppliers in Tunisia, Portugal and Hungary. In the last few years, Uniform Brands started to shift its production towards China and Bangladesh but has not started to move a significant portion of its production volume to these countries. The company would rather remain focused on production in Tunisia.

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: Uniform Brands did not start any new production in 2018 and all production locations had signed and returned the questionnaire with the Code of Labour Practices.

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

**Comment:** In 2018, Uniform Brands began the process of due diligence looking into a new sourcing location in Tunisia, this location is already being used by a FWF member and was audited by FWF in November 2018. Discussions have already begun around capacity and planning to ensure the factory will not be overburdened with additional (new) customer orders. In case a new supplier is selected, they first look at current factories being used by Uniform Brands UK parent company and also a preference to factories already being used by FWF members.

Due diligence is conducted by visiting the supplier and discussing labour standards. Uniform Brands is aware of high risks in countries like Tunisia, China and Bangladesh. Both a country risk assessment and the evaluation of audit reports is not yet done in a systematic manner.

**Recommendation:** It is advised to describe the process of assessing working conditions at potential new suppliers in a sourcing strategy that is agreed upon with top management/sourcing staff. FWF recommends Uniform Brands to complete both a country risk assessment and the evaluation of audit reports in a systematic manner.

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:** Uniform Brands sources from a small range of suppliers. The brand has monitored its suppliers in Tunisia. It discusses audit results a few times over the year via email with Uniform Brands. Progress made by the satellite production locations is registered in visit reports made by staff in Tunisia.

About 4% of production takes place in China and Bangladesh. Uniform Brands is not aware of the situation at its Chinese and Bangladeshi suppliers and does not evaluate their compliance with the Code of Labour Practice.

The brand does not yet have a system in place to record follow up at all of its suppliers and evaluate in a consistent manner.



Although Uniform Brands sometimes rewards good performance on social compliance with more orders, the brand does not yet do this in a clear and consistent manner. It has not yet set up a clear evaluation method and shared that with the factories.

**Requirement:** FWF encourages Uniform Brands to develop an evaluation/grading system for suppliers where compliance with labour standards is a criterion for future order placement. Part of the system can be to create an incentive for rewarding suppliers for realised improvements in working conditions. Such a system can show whether and what information is missing per supplier and can include outcomes of audits, trainings and/or complaints.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.6 The member company's production planning systems support reasonable working hours.	Strong, integrated systems in place.	Member company production planning systems can have a significant impact on the levels of excessive overtime at production locations.	Documentation of robust planning systems.	4	4	0

**Comment:** The majority of Uniform Brands' production takes place in Tunisia, where it has a factory with a number of satellite production facilities located in the vicinity. For these factories, it knows what the standard working minutes are for each product. This, in combination with knowing the production capacity, allows Uniform Brands to plan production in a way that avoids overtime, planning for a 48 hour week with quarterly forecasts also shared with the factory.

If there is insufficient production capacity orders are shifted forward into the coming weeks where Uniform Brands uses a colour coded graph that easily shows which weeks already have booked and/or free capacity. At its own supplier, orders are outsourced to one of the satellite production facilities. The main Tunisian factory closely plans production with these satellite production locations. Audits at both the main supplier and subcontractors in 2016 showed that excessive overtime is not an issue. Workers often worked reduced hours due to insufficient orders. Despite the fact that Uniform Brands knows these production locations and most have been FWF-audited, it is not involved in the decision-making process about placing orders at subcontractors when production capacity is needed. Because production shifts between subcontractors, it limits the ability for Uniform Brands to maintain stable relationships and improve working conditions. These findings will need to be reviewed in 2019 to see if they are still relevant.

For the production location in Hungary, it also works with standard working minutes. For the Portuguese supplier, Uniform Brands asks for an estimate on when the products can be delivered. Both of these production locations are located in low-risk countries, meaning that audits are not necessary as local institutions are capable of protecting workers' rights.

In 2017, it also placed some production at production locations in China and Bangladesh. Uniform Brands does not discuss planning with these suppliers, but the brand asks for a delivery date which is often between 14-16 weeks and offers flexibility as to the production planning and delivery. Due to the small number of orders placed and the low leverage Uniform Brands has at these suppliers, the brand expects that the orders given would not affect the production process of these factories that much.

**Recommendation:** FWF strongly encourages Uniform Brands to further integrate planning with the Tunisian satellite production locations. It should put a strategy in place towards its subcontractors to maintain stable business relationships and work on improving working conditions.

Furthermore, FWF recommends Uniform Brands to establish a production planning system tailored to the situation in China and Bangladesh that supports reasonable working hours. It is advised to establish a system for sharing and updating forecasts with suppliers to facilitate their planning. The system may include assurance of early delivery of materials and trimmings to suppliers, ensuring samples are approved in time and that late changes are discussed with the supplier. The brand could learn more about the production capacity of the factories and how Uniform Brands' orders impact that production capacity.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.7 Degree to which member company mitigates root causes of excessive overtime.	No production problems /delays have been documented.	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.	N/A	6	0

**Comment:** Uniform Brands has good oversight of working hours at its Tunisian locations but very little transparency over production locations in Bangladesh and China.

In China and Bangladesh, workers in the garment industry are at a high risk of working excessive overtime. Uniform Brands did not undertake efforts to mitigate the very real risks related to overtime at its Chinese and Bangladeshi suppliers. Although existing audit reports were collected there was no evidence of following up on working hours.

**Recommendation:** Uniform Brands should ensure that it learns more about possible excessive overtime at its Bangladeshi and Chinese suppliers. In case excessive overtime takes place, the brand should engage with suppliers to mitigate this issue. A first step would be to ask for existing audit reports and discuss those with the suppliers.

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.	Intermediate	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.	2	4	0

**Comment:** In Tunisia, Uniform Brands knows the working minutes required for each product-style. The brand also calculates the working minute price with a price surcharge or discount depending on the order volume.

Negotiations are focused on the standard minutes per style. Uniform Brands is also aware of the legal minimum wage levels, but not of the cost per labour minute. Increases in minimum wage levels are covered by a price increase.

Uniform Brands does not know the working minute price for their suppliers in Bangladesh and China and is not aware of the legal minimum wage levels in these countries. Uniform Brands tries to estimate market-based prices by comparing them to other suppliers. It negotiates prices in a partnership manner and does not push for lower prices.

**Recommendation:** At a minimum, members are recommended to investigate wage levels in production countries, among others by making use of FWFs Wage Ladder and country studies. As an advanced step, increased transparency in costing and productivity gives insight into the labour costs per product. This forms the basis for ensuring enough is paid to cover at least a minimum wage and for making steps towards living wages.

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.	No problems reported/no audits	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.	N/A	0	-2

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

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

**Comment:** At its main Tunisian supplier, Uniform Brands is aware of the wage levels. It is also aware of the FWF wage ladder and which steps it needs to take to come to a living wage. Because Uniform Brands is in the same holding with another brand also sourcing here and its main Tunisian supplier, it has access to costing data. At its other Tunisian suppliers, Uniform Brands knows from FWF-audits what the wage levels are at these factories and can compare them to living wages. It has discussed living wages with its Tunisian suppliers and is investigating the breakdown of living wages for one or two-person household costs. Their QC staff in Tunisia has calculated wage differences to reach living wage and discussions are taking place with worker delegations ut this information could not be verified at the Performance Check.

It is not aware of wage levels at its suppliers in China and Bangladesh. It did not take any steps to discuss living wages with these suppliers.

**Requirement:** FWF encourages Uniform Brands to discuss with suppliers about different strategies to work towards higher wages. It is advised to start with suppliers where the member is responsible for a large percentage of production and long term business relationship.

**Recommendation:** FWF recommends Uniform Brands to have one of the auditors check the living wage calculations made by their QC staff.

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).	84%	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.	2	2	0

**Comment:** Uniform Brands' main supplier is owned by the same holding, but it does not own this production facility itself. The holding group is taking a more active approach to CSR by hiring a CSR responsible person to work with other subsidiary brands in a joint collaborative effort of sharing audits and information and they are now working together to share production locations and information regarding factories.

**Recommendation:** FWF recommends for Uniform brands to have a more active discussion with the holding company on a collaborative approach towards CSR goals at this supplier and to be in general overall alignment.

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:** Uniform Brands have addressed the initial topic of living wages in the past financial year, but have not yet determined a target wage or discussed how to finance wage increases.

**Recommendation:** As Uniform Brands is part of the holding that owns a production location, the member company has full influence over the wages and should be able to cost for a living wage. It is advised that the strategy for how to finance wage increases is agreed upon by top management.

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:** Uniform Brands has not yet defined a target wage.

**Requirement:** Uniform Brands is expected to begin setting a target wage for its production locations.

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## PURCHASING PRACTICES

Possible Points: 41

Earned Points: 25

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## 2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	84%	
% of production volume where monitoring requirements for low-risk countries are fulfilled	12%	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.	N/A	Monitoring threshold below 80%.
Requirement(s) for next performance check	For those production locations eligible for 'tail-end monitoring' the following steps must be taken: all factories must be visited at least once every three years. During visits, labour conditions and the use of subcontractors must be discussed, outcomes of the discussion must be documented and the FWF health and safety checklist must be completed.	
Total of own production under monitoring	96%	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 Head of Finance is responsible for all Tunisian operations and Director of Sourcing is responsible for the monitoring processes in all other production locations.

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.	No Corrective Action Plans were active during the previous year	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.	N/A	2	-1

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:** Uniform Brands continued to follow up on the audit reports from 2016 through the Head of Finance visiting the suppliers and discussing the outcomes with them once a year and ongoing email reports throughout the year. Additionally, Uniform Brands keeps track of the progress made by the supplier through visits conducted by the QC staff based in Tunisia. A report is sent that verifies certain CAPs have been completed such as salary slips being issued and fire safety requirements.

Its main Tunisian supplier has set up an improvement plan, including the necessary costs and timelines when it comes to health and safety. Due to a lack of funds, the supplier was not able to make the improvements. Uniform Brands also discussed several improvements with the Tunisian subcontractors. Non-payment of social security remains a serious issue due to a lack of funds and orders.

The brand has not verified whether the improvements were actually realized by means of checking documents, a monitoring visit by an independent expert or an audit.

Uniform Brands did not actively follow up on issues at its Bangladeshi and Chinese suppliers, due to very few orders and limited leverage.

**Requirement:** Resolving and remediating non-compliances is one of the most important criteria member companies can do towards improving working conditions. FWF expects members to examine and support the remediation of any problem that they encounter. Coordinated efforts between different departments are required to ensure sustained responses to CAPs.

**Recommendation:** Before an audit takes place, Uniform Brands is recommended to check with the supplier whether worker representatives are active. In this way, they can be involved from the start of an audit and be invited for the audit opening and exit meeting.

Including workers when following up on audit reports gives them the opportunity to be informed of issues in the factory and have a voice in the prioritization of issues.

FWF recommends Uniform Brands to only close issues when verification can be provided by showing proof (pictures, documentation) or by on-site visits, or by including worker representation, or an independent third party.

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.	89%	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:** Uniform Brands visited its Tunisian and Hungarian production locations in 2018.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.6 Existing audit reports from other sources are collected.	Yes	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.	1	3	0

**Comment:** Uniform Brands has collected existing audit reports for one of its Bangladesh and one of its Chinese suppliers.

**Recommendation:** FWF recommends Uniform Brands to use the Audit Quality Assessment Tool and immediately discuss with the supplier what information is missing and how to collect that information.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.7 Compliance with FWF risk policies.	Average score depending on the number of applicable policies and results	Aside from regular monitoring and remediation requirements under FWF membership, countries, specific areas within countries or specific product groups may pose specific risks that require additional steps to address and remediate those risks. FWF requires member companies to be aware of those risks and implement policy requirements as prescribed by FWF.	Policy documents, inspection reports, evidence of cooperation with other customers sourcing at the same factories, reports of meetings with suppliers, reports of additional activities and/or attendance lists as mentioned in policy documents.	1	6	-2
Compliance with FWF enhanced monitoring programme Bangladesh	Insufficient			-2	6	-2
Compliance with FWF Myanmar policy	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on abrasive blasting	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:** Bangladesh: Uniform Brands sources from two Bangladeshi suppliers. Despite the fact that it accounts for less than 2% of its FOB, FWF still requires members to ensure that it complies with the enhanced monitoring programme. Uniform Brands did not follow up on a 2018 BSCI-audit report or take any other measure to mitigate the health and safety risks. One of the factories is a member of the Bangladesh Accord, but Uniform Brands did not check whether the factory is progressing.

In general, Uniform Brands is aware of risks in China, Bangladesh and Tunisia but does not assess these risks in a systematic manner nor does it actively follow up on these risks in China and Bangladesh.

**Requirement:** Uniform Brands needs to ensure that all production locations participate in the fire and building safety awareness raising workshop for top management as a basic requirement of the enhanced programme on monitoring and remediation. FWF offers the workshop at least twice a year in Bangladesh.

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
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: Uniform Brands visits its suppliers in Hungary and Portugal regularly. The FWF Code of Labour Practices is posted and the questionnaire completed.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.10 Extra bonus indicator: in case FWF member company conducts full audits at tail-end production locations (when the minimum required monitoring threshold is met).	No	FWF encourages its members to monitor 100% of its production locations and rewards those members who conduct full audits above the minimum required monitoring threshold.	Production location information as provided to FWF and recent Audit Reports.	N/A	2	0

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.11 Questionnaire is sent and information is collected from external brands resold by the member company.	No	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.	0	2	0

Comment: Uniform Brands buys a small amount of its production from another company of the same holding, with whom it closely cooperates. It is aware of the production locations and social compliance programme of this producer. It also sources products from another external brand and has not collected the questionnaire which was also identified as missing in last year's Brand Performance Check.

Requirement: FWF member should send the FWF questionnaire for external production to the brand(s) it resells.



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

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.13 Questionnaire is sent and information is collected from licensees.	No licensees	FWF believes it is important for member companies to know if the licensee is committed to the implementation of the same labour standards and has a monitoring system in place.	Questionnaires are on file. Contracts with licensees.	N/A	1	0

## MONITORING AND REMEDIATION

Possible Points: 31

Earned Points: 14

### 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 Head of Finance is responsible for handling worker complaints.

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: During the Brand Performance Check, Uniform Brands was able to show that the FWF Code of Labour Practices was posted in all production locations. The Chinese version was an out of date version that did not have the complaints number visible.

Recommendation: It is suggested that regularly check the Member Hub for updated documents available. Staff visiting a supplier can then check if the documents are correct and still posted as indicated on the obtained photo.

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.	64%	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:** Three Tunisian suppliers were FWF-audited in the last three years. A WEP-basic took place at its main Tunisian supplier and at a Bangladeshi subcontractor. Workers at the two subcontractors were not yet aware of the FWF CoLP and FWF worker helpline.

**Recommendation:** Uniform Brands could consider implementing additional activities to raise awareness about the FWF Code of Labour Practices and FWF complaint hotline next to providing good quality training. This could include providing the FWF worker information cards to workers during visits or when handing out pay slips, making use of FWF's Factory Guide, stimulating peer-to-peer learning among workers and ensuring factory management regularly informs workers, in particular, new workers, about their rights and available grievance mechanisms.

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: Once a year, staff are updated on the Brand Performance Check outcomes and all FWF activities, actions and plans. Sales meetings and other joint team meetings also include FWF updates and production location findings from teams on location.

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 Head of Finance participated in the FWF Annual Conference. Staff in direct contact with suppliers are informed of FWF requirements.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices.	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

**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.	No training programmes have been conducted or member produces solely in low-risk countries	After factory-level training programmes, complementary activities such as remediation and changes on brand level will achieve a lasting impact.	Documentation of discussions with factory management and worker representatives, minutes of regular worker-management dialogue meetings or anti-harassment committees.	N/A	2	0

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## TRAINING AND CAPACITY BUILDING

Possible Points: 9

Earned Points: 3

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## 5. INFORMATION MANAGEMENT

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
5.1 Level of effort to identify all production locations	Intermediate	Any improvements to supply chains require member companies to first know all of their production locations.	Supplier information provided by member company. Financial records of previous financial year. Documented efforts by member company to update supplier information from its monitoring activities.	3	6	-2

**Comment:** Uniform Brands is generally well aware of all its production locations. At one Bangladeshi subcontractor, the factory uses homeworkers. According to Uniform Brands, the main Bangladeshi supplier checked whether orders of Uniform Brands were actually produced at this location.

**Recommendation:** FWF recommends Uniform Brands to set up a system to ensure that it can prevent and verify that products in Bangladesh are not outsourced.

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:** Staff can access FWF material, audit reports and CAPs. Uniform Brands has regular discussions with responsible staff on FWF requirements and follow up on audits.



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## INFORMATION MANAGEMENT

Possible Points: 7

Earned Points: 4

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## 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: Uniform Brands communicates about Fair Wear Foundation on its website, to customers and in tenders. It adheres to the FWF Communication Policy.

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: Uniform Brands publishes the Brand Performance Check 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	Inaccurate or not done	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: Uniform Brands published the social report on its website but has not yet submitted it to FWF.

## TRANSPARENCY

Possible Points: 6

Earned Points: 2

## 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: Uniform Brands holds annual evaluations of FWF membership with top management. Furthermore, top management discusses the outcomes of the Brand Performance Check to ensure progress is made.

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.	0%	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 the last Brand Performance Check, 7 requirements were given. (1.3, 1.5, 1.11, 2.3, 2.4, 3.2, 7.2)

The brand partially fulfilled the requirement of 2.4 by following up more actively on audit results, however, the brand insufficiently followed up on all the other requirements and as such an insufficient score is given here.

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## EVALUATION

Possible Points: 6

Earned Points: 0

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# RECOMMENDATIONS TO FWF

## SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	25	41
Monitoring and Remediation	14	31
Complaints Handling	7	9
Training and Capacity Building	3	9
Information Management	4	7
Transparency	2	6
Evaluation	0	6
Totals:	55	109

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

50

**PERFORMANCE BENCHMARKING CATEGORY**

Good

## BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

13-06-2019

Conducted by:

Brigitta Danka

Interviews with:

Ruud Wissink - Director of Finance, IT & Logistics

Peter Goejer - Director of Sourcing