



BRAND PERFORMANCE CHECK

Bierbaum-Proenen GmbH & Co. KG

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

ABOUT THE BRAND PERFORMANCE CHECK

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

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

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

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

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

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

BRAND PERFORMANCE CHECK OVERVIEW

Bierbaum-Proenen GmbH & Co. KG

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

MEMBER COMPANY INFORMATION	
Headquarters:	Koln, Germany
Member since:	01-07-2010
Product types:	Workwear
Production in countries where FWF is active:	Bangladesh, China, Republic of North Macedonia, Romania, Tunisia, Turkey, Viet Nam
Production in other countries:	Albania, Armenia, Germany, Pakistan, Poland
BASIC REQUIREMENTS	
Workplan and projected production location data for upcoming year have been submitted?	Yes
Actual production location data for evaluation period was submitted?	Yes
Membership fee has been paid?	Yes
SCORING OVERVIEW	
% of own production under monitoring	99%
Benchmarking score	83
Category	Leader

Summary:

Bierbaum-Proenen (BP) has made progress and shown advanced results on performance indicators. A combination of Fair Wear audits and external audits result in a monitoring percentage of 99%. This result and a benchmarking score of 83 means BP maintains its 'Leader' status.

In the past financial year, BP has focused on addressing worker-management dialogue at production locations as a way to improve labour conditions and to prevent issues from becoming official complaints. The company has organised training sessions focused on internal communication at different production locations and is starting to see improvements because of it.

BP has clear processes in place on due diligence, which are updated based on information from audits, factory visits and external sources. This information is also included in supplier evaluations, which are shared with other teams within the company as well as with the suppliers.

Although BP collects information on wages for all production locations and labour minute costs for most of them, the company is not yet able to show that it contributes to its share of a living wage. Fair Wear recommends that the company combine the information they have to create a clearer link between the labour minute price the company pays and the current wage levels.

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.	92%	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: While BP has high leverage at its main suppliers, the leverage of production capacity at suppliers less important to BP is less than 10%. BP is aware of this risk and actively suggests to these suppliers to find other brands to produce there as well in order to reduce the risks for the production location in case BP stops working at the production site.

Like previous years, approximately 70% of BP's sourcing volume is made on CMT-basis (Macedonia, Armenia, Tunisia, Vietnam), the other 30% is bought ready-made (China, Pakistan, Turkey).

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.	2%	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: BP has a small and limited amount of suppliers of which the company buys less than 2% of its total FOB.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.2 Percentage of production volume from production locations where a business relationship has existed for at least five years.	69%	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: BP has long-lasting business relationships with most of its suppliers. One production site in Turkey moved to a new building and changed its name in 2015. However, the new production site is led by the same management and workers are partly still the same, BP remains to have the same strong relationship. All orders are arranged via the old location which is now functioning as a head office.

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: In 2018, BP did not start production at new production locations. The questionnaires of other production locations have been checked during previous performance checks.

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: Clear processes to check all suppliers against the Code of Labour Practices are in place. Both regarding new suppliers and existing suppliers. All potential new suppliers are visited by either the CEO, the head of purchasing or the head of production before trial orders are placed. Social standards are an important issue in these first meetings. The travel report made by them also includes suppliers' willingness to work on the FWF CoLP.

Before BP places the first orders at new suppliers the selected supplier must hand in supplier information. As part of its quality management system, there is a quality management process to follow up on this internally for both new and existing production locations. For new suppliers, BP requires them to provide an audit before a formal business relationship can start. This could be a FWF or other audit report such as BSCI, SEDEX, SA8000. This is to ensure that new suppliers are prepared for auditing and know about the processes. This evaluation is integrated into the decision making of whether to start production at a new supplier and to have a benchmark of the working conditions from the beginning.

BP also conducts country risk assessments for its suppliers based on several benchmarks, such as Human Development Index (HDI), regular updates from Fair Wear Foundations and based on information from their production locations. In management meetings, BP's management discusses in which country and with which suppliers it wants to start a cooperation.

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, and leads to production decisions	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.	2	2	0

Comment: BP evaluates suppliers' social compliance systematically. BP thus uses different sources to check the working conditions of its suppliers: supplier information and evaluation, Health and Safety Checklists, CAPs and travel reports of BP staff after visiting a production site. Continuous evaluation of production location compliance with Code of Labour Practices is shared with suppliers regularly and forms the basis of the ongoing discussion.

Information on social compliance is included in the general supplier evaluation system which includes indicators on products, the supplying company, the services, and the price. All of these indicators guide production decisions. If suppliers score low extra attention is given to see how they can improve. If suppliers fail to improve over a certain period of time (depending on the actual score) BP's exit strategy comes into force. If suppliers score high they are included in the development of new products and are thereby recognised as valuable partners for future orders.

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: For every supplier, BP arranges fixed lead times depending on the location of the supplier and if they do CMT or FOB production. For its biggest suppliers, BP's production planning is based on labour minute calculation. For the smaller suppliers, the production demand is based on an agreed weekly number of pieces which is monitored on a weekly basis. If a supplier does not meet the agreed output, the weekly agreed pieces can be reduced.

Factories tell BP how many lines and minutes/pieces are available for BP orders. Generally, the fixed lead times include a time reserve of one week to be flexible in case of unexpected problems. BP also includes holiday plans for its production sites when sending the forecasting plan. BP additionally re-confirms with its suppliers the status of production every two weeks. This is to ensure the booked capacity is in fact used for the production of BP goods and delays are encountered at an early stage.

BP has a very broad and extensive range of 'never-out-of-stock' products (NOS). For all production locations, BP has regular quantities of repeating articles per month. The goal is to provide suppliers with the same styles. When there is sudden extra demand in certain styles, suppliers are called to check for additional capacity (and different delivery dates are agreed upon). In cases where production capacity is an issue, NOS production is replaced by urgent additional styles, and existing stock is used for standard goods while the additional style is produced.

The company keeps a large stock supply and aims for equal production planning throughout the year which is regularly checked with its suppliers in order to produce without excessive overtime. Furthermore, BP has material in stock at its biggest suppliers. This stock gives the company and its suppliers more flexibility in case of urgent orders, reducing pressure on delivery times and therefore risk of overtime. Moreover, several of BP's suppliers can produce the same styles.

In 2018, around 90% of the production was received on time. For the products that were delayed, for example due to problems at customs or late material delivery, the information is fed back into the planning system to adjust the planning process to the actual situation.

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

Comment: To understand the overtime situation at the production sites, BP re-confirms with its suppliers the current status of production every two weeks. In general, occasional overtime happens at some suppliers, but BP does not face serious issues of excessive OT. In case a supplier has a delay in production, which would lead to excessive overtime, the company shifts production to another supplier or allows for late or split shipment or use of air freight.

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.	Advanced	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.	4	4	0

Comment: Price negotiations for CMT are done based on standard minutes developed in house at BP's own production unit. Cost of material and accessories are known as well as CMT price, BP has a good impression of costs for management and workers as it can compare price and working minutes with other comparable suppliers including their own factory. Local wage levels are taken into account through this system when calculating an acceptable price. Further BP considers inflation in price agreements with the suppliers each year.

For suppliers which are paid FOB (30% of all), BP asks for the CMT price so it has an idea of how much workmanship needs to go in each product and bases its price on this and then calculate by price per minute. BP relates the price among others to the size of the production volume and related productivity and working minutes needed.

BP has started an analysis comparing minimum wages and local living wages before and after social audits in the past years. Doing this, the company can measure wage increases in the long-run. BP also compares minimum wages against their calculated minute wages and whether paying the minute wages would lead to a higher wage than the minimum wage.

On a case-by-case decision, BP also can agree to price increases of its suppliers. In some cases, BP has contract agreements of regularly price increases with its suppliers. In addition, BP has a calculation of almost each article about the amount of production minutes per piece. This calculation is checked also via sewing sample tests in its own production location in Cologne.

Recommendation: BP collects two separate kind of information regarding wages, one is the labour minute price, the other is the wage data of the factory. FWF recommends the company to combine the two to be able to identify whether a change in price actually impacts the 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

Comment: Once a year BP asks for wages of their production sites. With the analysis and the audit reports, BP checks the minimum wages. Via the audit analysis on wages, BP can keep an overview of the status of wages at the audited suppliers. At all audited production sites in 2018, FWF found the payment of at least the minimum wage.

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: Using the FWF wage ladder information, BP cross-checks the development of the wages within the production sites annually, comparing the actual wages paid to living wage estimates and local minimum wages. Wages are part of discussions during supplier visits. From these discussions, the company sees that suppliers struggle with evaluating what workers need more than just the legal minimum wage. This has been identified as one of the root causes of wages lower than a living wage. Therefore BP focuses on continuing the discussion to address this struggle.

Recommendation: FWF encourages BP to involve worker representatives and local organisations in addressing root causes of wages lower than living wages.

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).	15%	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.	1	2	0

Comment: One production site in Tunisia is owned by BP. Furthermore, a small amount of production and samples are produced in Cologne, Germany at the headquarter.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.13 Member company determines and finances wage increases	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.	2	4	0

Comment: BP aims to contribute to the payment of a living wage in all their production locations. Every year they compare the prevailing wages against this target to track progress. At the moment the company focuses on ensuring the prevailing wages during regular working hours. The company uses its labour minute costing methodology to ensure its prices contribute to wages above the legal minimum wage. The financing of higher wages will therefore be covered by the brand's margin.

Recommendation: In determining what is needed and how wages should be increased, it is recommended to involve worker representation.

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	15%	FWF member companies are challenged to adopt approaches that absorb the extra costs of increasing wages.	Member company's own documentation, evidence of target wage implementation, such as wage reports, factory documentation, communication with factories, etc.	1	3	0

Comment: At its own factory in Tunisia, responsible for 15% of total FOB placed by BP, the company pays almost according to the estimated living wage benchmarks recommended by local stakeholders of FWF. The factory is located outside of Tunis, in an area where living standards are a little lower than in the city. In addition, it provides full coverage of social insurance, correct payments of working hours and overtime (if needed) and extra benefits (compared to other factories around), such as 100% social insurance, providing free doctor consults at the factory, longer-term contracts with employment protection.

PURCHASING PRACTICES

Possible Points: 47

Earned Points: 38

2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	98%	
% of production volume where monitoring requirements for low-risk countries are fulfilled	1%	To be counted towards the monitoring threshold. FWF low-risk policy should be implemented. See indicator 2.9. (N/A = no production in low risk countries.)
Meets monitoring requirements for tail-end production locations.	Yes	
Requirement(s) for next performance check		
Total of own production under monitoring	99%	Measured as percentage of production volume (Minimums: 1 year: 40%; 2 years 60%; 3 years+: 80-100%)

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.1 Specific staff person is designated to follow up on problems identified by monitoring system	Yes	Followup is a serious part of FWF membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	2	2	-2

Comment: BP has a team of three people who are responsible for the monitoring system. The members of the team belong to the CSR and buying department.

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

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

Comment: The corrective action plans resulting from conducted audits are systematically agreed upon, followed up and reported on by designated persons including the traveling staff of BP.

When sending the audit report and corrective action plan, BP always highlights to factory management that everything should be discussed and followed up together with the worker representation. Experience in involving worker representation showed to BP that in some factories involvement of worker representation works well and in others, it does not. If not, BP is aware that this does not only count for the follow-up of findings but is of a general matter and an issue related to social dialogue which needs extra work upon.

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: BP was able to show active follow-up on CAPs and findings actually being resolved. At the moment the remediation focuses on remediating CAP findings and does not show shared responsibility for remediation or addressing of root causes.

Recommendation: It is advised to include worker representation in the remediation process. Either to engage workers in identifying and implementing improvements or to verify realised improvements. In addition, Fair Wear expects the company to take a more active role in remediation, showing more shared responsibility for remediation.

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: BP staff visited production locations responsible for 89% of FOB.

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: BP checks all suppliers for other social audit reports on an annual basis. The reports are collected, the FWF Audit Quality Assessment Tool done and CAPs integrated into the existing routine to follow up improvement possibilities at the production sites. Reports from other organisations are actively used to follow up uncovered points and to cross-check implementation status from what is reported by the supplier via email, phone and visits at the production site.

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.	4	6	-2
Compliance with FWF enhanced monitoring programme Bangladesh	Intermediate			3	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	Advanced			6	6	-2
Other risks specific to the member's supply chain are addressed by its monitoring system	Intermediate			3	6	-2

Comment: BP sourced from one production location in Bangladesh in 2018. BP is not a member of the Bangladesh Accord, but its production location is a member of the Accord and has been audited. BP indicated that it has no plans to become a member of the Accord as its FOB sourced from this production location do not weigh up against the costs of membership. Other important aspects of the Enhanced Monitoring for Bangladesh (such as risk analysis, anti-harassment policies, and fire and health and safety monitoring) have been taken care of by the company.

Regarding the guidance of Syrian refugees in Turkey, BP had several meetings with this supplier last year. The 2016 and 2017 audits did not show Syrian refugees in the facilities. Furthermore, the supplier is monitored very intensively.

BP made the supplier aware of the problems regarding the Syrian refugees. During these discussions, the supplier explained that in order to maintain their financial support from the government, the supplier is not allowed to employ any Syrian refugees as part of the arrangement made with the government. Employees must have Turkish nationality (and thus it is not allowed to employ Syrian refugees).

Albeit BPs explicit request that homeworkers need to be accepted by BP prior to production, an FWF audit indicated that a Turkish production location works with home-based workers. The supplier allowed workers to do home-based work in order to have less commuting time. BP did not give permission for homeworkers for this production location. After the audit, BP found a solution together with the supplier. Now, the specific tasks are completed in the factory. BP has shared Fair Wear's guidance for home-based workers with the supplier to ensure that in case they use homeworkers for other customers they are aware of the specific risks.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.8 Member company cooperates with other FWF member companies in resolving corrective actions at shared suppliers.	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: BP actively cooperates with FWF members and brands not affiliated to FWF in four of its production locations.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.9 Percentage of production volume where monitoring requirements for low-risk countries are fulfilled.	50-100%	Low-risk countries are determined by the presence and proper functioning of institutions which can guarantee compliance with national and international standards and laws. FWF has defined minimum monitoring requirements for production locations in low-risk countries.	Documentation of visits, notification of suppliers of FWF membership; posting of worker information sheets, completed questionnaires.	2	3	0

Comment: Production in low-risk country is in Germany at the headquarter of BP and at a German and Polish supplier. Monitoring requirements are fulfilled at all three sites. BP's CSR staff visited all production sites in low-risk countries in 2018. The Code of Labour Practice has been signed and the Worker Information Sheets are posted.

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 external brands resold	FWF believes it is important for affiliates that have a retail/wholesale arm to at least know if the brands they resell are members of FWF or a similar organisation, and in which countries those brands produce goods.	Questionnaires are on file.	N/A	2	0

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.12 External brands resold by member companies that are members of another credible initiative (% of external sales volume).	No external brands resold	FWF believes members who resell products should be rewarded for choosing to sell external brands who also take their supply chain responsibilities seriously and are open about in which countries they produce goods.	External production data in FWF's information management system. Documentation of sales volumes of products made by FWF or FLA members.	N/A	3	0

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

MONITORING AND REMEDIATION

Possible Points: 30

Earned Points: 23

3. COMPLAINTS HANDLING

BASIC MEASUREMENTS	RESULT	COMMENTS
Number of worker complaints received since last check	1	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	1	
Number of worker complaints resolved since last check	1	

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: BP has a team of three persons who are designated to address workers 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: Staff from BP checks that the information sheet for workers is posted in the factories when they visit the production location and via emails and pictures to proof. During visits, a special developed BP checklist is used, filled in by technicians, based on the FWF Occupational Health and Safety checklist added with additional issues, such as posting of FWF CoLP in the production location, availability/ access to primary healthcare etc. Pictures of the posted worker information sheet are collected.

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.	6%	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: BP organised training a WEP Basic training at one production location, responsible for 6% of FOB.

Recommendation: FWF recommends members to actively raise awareness about the FWF Code of Labour Practices and FWF complaint hotline among a larger portion of its suppliers. The member should ensure good quality systematic training of workers and management on these topics. To this end members can either use FWF's Workplace Education Programme (WEP) basic module, or implement training related to the FWF CoLP and complaint hotline through service providers or brand staff. FWF guidance on good quality training is available on the Member Hub.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.4 All complaints received from production location workers are addressed in accordance with the FWF Complaints Procedure	Yes + Preventive steps taken	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.	6	6	-2

Comment: BP received several complaints related to worker-management communication. The company has responded to these complaints in line with the Fair Wear Complaints procedure and has organised training in these production locations focused on improving worker-management dialogue. In addition, BP is now more aware of this issue and discusses worker-management communication as part of regular discussions with production locations.

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: 15

Earned Points: 13

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: All BP staff is made aware of FWF membership requirements. Several times a year, BP provides a FWF training for travelling staff, all new BP employees (requirement for job training) and interested colleagues. In addition, BP informs its staff about FWF topics such as their new sustainability report, the Brand Performance Check report and its result.

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: Staff is trained in general. Staff traveling to production sites is briefed in detail before visiting the production site. Usually, the CSR team briefs the traveling staff about supplier specific problems and asks for proof such as documents, notes, pictures and even video shots.

BP has developed a checklist to check social standards for traveling staff like technicians. Traveling staff is informed and regularly trained how to handle the checklist. The traveling staff hands the filled in documents and pictures to the CSR team. The CSR team evaluates the situation at the production site.

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

Comment: With three suppliers BP works with an agent and all agents and their factories signed the FWF CoLP requirements. In addition to informing the agent, the production sites are visited regularly by staff of BP.

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.	33%	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.	4	6	0

Comment: BP organised trainings at three different production locations focused on improving worker management dialogue.

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: After the training, BP has discussed the report with the factories and has monitored progress. One sign of progress is that there have been fewer complaints after the training happened and the factory reports that grievances have been dealt with internally.

TRAINING AND CAPACITY BUILDING

Possible Points: 13

Earned Points: 11

5. INFORMATION MANAGEMENT

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
5.1 Level of effort to identify all production locations	Advanced	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.	6	6	-2

Comment: BP has a designated person who keeps the supplier register updated. The staff of Purchasing/Sustainability, Production, Planning and travelling staff is made aware who the suppliers are and their locations. BP uses its supplier register and FWF Database to identify suppliers and update supplier information. Production locations are frequently visited during production to check on quality and whether production actually takes place in the agreed production location.

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: BP has developed a system where information regarding code compliance is integrated in the overall assessment of the supplier. At this point, staff is informed about compliance and outstanding issues prior to factory visits. Staff can also access documents regarding social compliance of the individual suppliers on the server. Responsible staff from departments related to suppliers and products meet monthly, FWF and social compliance in general is part of the agenda.

INFORMATION MANAGEMENT

Possible Points: 7

Earned Points: 7

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: BP's website and catalogues are the most important communication channels for BP to communicate about FWF membership. Furthermore, the company has informed the public, customers and end users through press releases, flyers and social media channels. Communication regarding FWF is important to BP, and the company experiences a growing interest from customers. For interested customers, BP has a special information sheet explaining key aspects of FWF, also to make sure third-party sellers stick to the communication guidelines.

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 is published on BP's website and the social report includes audit results.

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: BP publishes its sustainability report (includes its social report) online in German and English, which is available for download on its German, English, Dutch and French websites. The Social Report is mentioned as news item on BP website and posted on BP's Facebook page.

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: The Manager for Sustainability is responsible for evaluation of the effectiveness of the workplan and available resources. An evaluation meeting on FWF membership takes place every year with top management.

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

EVALUATION

Possible Points: 2

Earned Points: 2

RECOMMENDATIONS TO FWF

Would like to motivate FWF to work on:

- More detailed information about the Bangladesh ACCORD.
- Intensify cooperation with Gruener Knopf to ensure FWF members are acknowledged in their efforts to improve labour conditions.
- Being more responsive to emails.
- Creating more stability in brand liaisons for the brand.
- Change the performance check cycle for example to every two years, for brands that have been members for a long(er) time to be able to show actual progress. The same applies to the social report. More action and less reporting.
- Ensure all relevant information that is in the member hub is included in the member monthly update.
- It would be good if increases in the membership fee would be shared with the brands personally.
- It would be good if CAPs would contain more detailed information and include photos.

SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	38	47
Monitoring and Remediation	23	30
Complaints Handling	13	15
Training and Capacity Building	11	13
Information Management	7	7
Transparency	5	6
Evaluation	2	2
Totals:	99	120

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

83

PERFORMANCE BENCHMARKING CATEGORY

Leader

BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

04-12-2019

Conducted by:

Anne van Lakerveld

Interviews with:

Harald Goost - CEO

Carla Cacitti - Head of Product Management

Fabian Kusch - Head of Purchasing

Ute Mueller - Head of Production

Daniel Wiewelhove - Head of Planning Department

Annet Baldus - Quality Management/Sustainability

Katharina Burdzik - Sustainability

Annika Dueren - Sustainability