

Brand Performance Check Nudie Jeans Co.

Publication date: June 2020

This report covers the evaluation period 01-01-2019 to 31-12-2019

About the Brand Performance Check

Fair Wear Foundation (Fair Wear) 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. Fair Wear, however, believes that the management decisions of clothing brands have an enormous influence for good or ill on product location conditions.

Fair Wear's Brand Performance Check is a tool to evaluate and report on the activities of Fair Wear's member companies. The Checks examine how member company management systems support Fair Wear'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 Fair Wear 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 Fair Wear 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 Fair Wear'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 <u>www.fairwear.org</u>. The online <u>Brand Performance Check Guide</u> provides more information about the indicators.

Brand Performance Check Overview

Nudie Jeans Co.

Evaluation Period: 01-01-2019 to 31-12-2019

Member company information	
Headquarters:	Goteborg , Sweden
Member since:	2009-11-11
Product types:	Garments, clothing, fashion apparel
Production in countries where Fair Wear is active:	India, Tunisia, Turkey
Production in other countries:	Italy, Lithuania, Poland, Portugal, Sweden
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	97%
Benchmarking score	80
Category	Leader

Disclaimer

This performance check was conducted amidst the COVID-19 outbreak in 2020. Due to travel restrictions in 2020, the assessment methodology for this check was modified to adapt to an online version.

While the performance check does cover all indicators, Fair Wear was not able to cross-check information with the member company's other departments to the extent it would normally do. This may have led to shorter descriptions/comments in the report. We have taken additional measures to ensure the scores are still inclusive and representative of the performance/progress made: more documentation was requested from the member during the preparation phase and other staff members were interviewed to score a specific indicator, where necessary. Furthermore, due to our improved data management system, Fair Wear was able to better track and document progress, mitigating much of the disadvantage of a remote performance check.

This modified version was applied consistently to all members' performance checks evaluating the year 2019 in order to maintain fair and comparable data.

Fair Wear's performance checks review the progress that was made in the previous financial year. In this case, the 2019 financial year. Thus, this report does not cover the member's response to COVID-19, which will be monitored during the year and evaluated in the next performance check.

Summary:

Nudie Jeans has shown advanced results on performance indicators and has made exceptional progress. With a monitoring percentage of 97% and a benchmarking score of 82, the brand remains in the 'Leader' category for the seventh consecutive year.

Nudie Jeans has laid a firm foundation to monitor all production locations. It has invested in online tools with which both the brand and the respective suppliers can update information, track progress on activities and update the status of audit findings. This system will provide the brand with an overview of the entire supply chain, common issues and support the brand in consolidating its efforts. Apart from that, the brand has strongly integrated systems in place to do due diligence before placing orders in factories and to support reasonable working hours.

Nudie Jeans has shown advanced efforts in paying its share of the living wage in India. These efforts make the company one of the frontrunners in the industry on the topic of living wage. Fair Wear encourages Nudie Jeans to keep scaling up its efforts in other countries, such as Tunisia.

Nudie Jeans is proactive in following up on complaints, specifically where this involves suppliers shared with other Fair Wear members. Fair Wear recommends that the brand invests efforts to work on transformative and preventive steps, for example by conducting additional training and ensuring well-functioning HR, communication and grievance procedures at its suppliers.

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 Fair Wear's belief that member companies who are making a serious effort to implement the Code of Labour Practices—the vast majority of Fair Wear 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: Nudie Jeans has 51 active suppliers, and sources in India, Italy, Lithuania, Poland, Portugal, Sweden, Tunisia, and Turkey. 89% of its 2019 production volume comes from suppliers where they buy at least 10% of the factories' production capacity.

For each style, Nudie Jeans wants to limit the number of suppliers. New suppliers are used only when a new style of a product group is introduced. New subcontractors are added to be able to support different production techniques (e.g. specific type of printing) which limits the brand's ability to consolidate and repeat production at the same subcontractors.

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.	22%	FWF provides incentives to clothing brands to consolidate their supplier base, especially at the tail end, as much as possible, and rewards those members who have a small tail end. Shortening the tail end reduces social compliance risks and enhances the impact of efficient use of capital and remediation efforts.	Production location information as provided to FWF.	0	4	0

Comment: 22% of Nudie Jeans production volume comes from production locations where it buys less than 2% of its total FOB, which is an increase of 10% compared to the previous year. The need to grow capacity in 2019 and Nudie Jeans' sourcing strategy required the need to have more production locations where it buys less than 2% of its FOB.

Recommendation: Fair Wear recommends Nudie Jeans to consolidate its supply base by limiting the number of production locations in its 'tail end'. To achieve this, Nudie Jeans 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. It is advised to describe the process of consolidation in a sourcing strategy that is agreed upon with top management/sourcing staff.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.2 Percentage of production volume from production locations where a business relationship has existed for at least five years.	88%	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: Nudie Jeans maintains a long term relationship of over 5 years with suppliers that account for 88% of the company's production volume. With subcontractors, the brand cannot guarantee continuing long-term relationships as skill and technique demands of a product define the type of subcontractor needed, which may not necessarily be available at an existing subcontractor.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.3 All (new) production locations are required to sign and return the questionnaire with the Code of Labour Practices before first bulk orders are placed.	Yes	The CoLP is the foundation of all work between production locations and brands, and the first step in developing a commitment to improvements.	Signed CoLPs are on file.	2	2	0

Comment: In 2019, the brand added six new suppliers (two CMT units and four subcontractors). All of the production locations signed and returned the questionnaire with the Code of Labour Practices. By doing so, Nudie Jeans fulfilled last year's requirement.

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: At a sourcing country level, Nudie Jeans has developed an evaluation of supplier countries with Human Development Index, Democracy Index, Global Peace Index, Corruption Perception Index forming the basis to define the lowest acceptable score to allow production in those countries. At existing supplying countries, if the total score of the country falls below the defined criteria for more than two consecutive years, the brand's policy requires that a plan of withdrawal is established within six months.

At a supplier level, a 'Factory Assessment Manual' is used as an assessment tool during first visits at new or potential new suppliers. The brand's team visits all new suppliers before orders are placed. A discussion with the supplier using the manual already informs the supplier about the brand's expectations requiring the supplier to be transparent and cooperate on addressing issues pertaining to the Code of Labour Practices. The manual also ensures that the brand checks and captures information pertaining to potential subcontracting and findings from existing audit reports. After buyers and designers have had their first meeting to discuss a new product, the sustainability manager meets with buyers to discuss possible sourcing countries and production locations. In this way, the sustainability department can avert possible risks at an early stage.

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: Nudie Jeans has a system to evaluate progress on improvements regarding social compliance for each production location. The member brand uses qualitative data, no score sheet is used for the evaluation. Nudie Jeans has eight product groups (jeans, jackets, knits, sweaters, shirts, ties, underwear and accessories). Each supplier is evaluated by the respective product group; all staff working with that product group are involved in the evaluation. CSR performance is equally important next to production and quality criteria. The member brand specifically evaluates the willingness of suppliers to improve on social compliance. In case a supplier falls behind in certain areas, a plan is established to make improvements. Buyers are included in communication with suppliers about social remediation so that suppliers know the decisions are supported by buyer/production staff, and not only CSR.

The brand uses an online platform where both the brand and respective suppliers can update information, track progress on activities like putting up a worker information sheet at a factory and update the status of audit findings. The dashboard offers a real-time status of task completion. This new system will also provide the brand with an overview of the entire supply chain, common issues and support the brand in consolidating efforts. The brand is still in the process of moving completely to this new system and onboarding all suppliers.

Given that one product type is mostly made at each supplier, the stock order fluctuates with changes in sales, which means it is difficult to reward suppliers with extra orders. The best suppliers have good visibility in the production guide on the brand website, which is public, and thus can be leveraged as a good communication tool by factories.

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: Nudie Jeans' production planning has four collections a year, a big spring and autumn collection and a relatively smaller summer and winter collection. That apart, the member brand has two capsule collections, and running styles, which are never out of stock items.

The lead-time for production varies for different product groups, depending on, if a new fabric is developed or if existing stock yarns are being used. For garments with longer lead-times for fabrics and production, the brand pre-estimates the quantity and places the orders a month earlier than other orders.

Nudie Jeans is aware of the production capacity of all factories and knows which production lines are used for their production and how much time it costs to complete their order. The brand engages with suppliers regarding peak and low seasons and tries to place orders/styles that are running during the whole year more specifically to the supplier's low seasons to balance their workload. The brand also works closely with suppliers through the production cycle, helps them prioritize orders and tracks their progress on a weekly basis. In case forecasting is not possible, the brand books an estimated capacity in advance at the supplier.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.7 Degree to which member company mitigates root causes of excessive overtime.	Intermediate efforts	Some production delays are outside of the control of member companies; however there are a number of steps that can be taken to address production delays without resorting to excessive overtime.	Evidence of how member responds to excessive overtime and strategies that help reduce the risk of excessive overtime, such as: root cause analysis, reports, correspondence with factories, etc.	3	6	0

Comment: In 2019, there was one Fair Wear audit which showed excessive overtime. The company followed up with the factory which was already aware of the situation and working on keeping to the legal hours. However, they needed more time to remediate this issue.

Recommendation: Besides discussing it with the supplier and assessing root causes, Fair Wear strongly recommends Nudie Jeans to actively take measures when excessive overtime is found. Taking measures to ensure that Nudie Jeans knows and shows whether excessive overtime takes place at a supplier as well as diligent follow-up is key in resolving the issue.

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: Nudie Jeans aspires that their prices and efforts should allow for payment of living wages. Normally, suppliers of Nudie Jeans give price estimations, and the company expects that these are set in a way that minimum wage is covered. This is later checked by auditing. At all factories of Nudie Jeans that have been audited the wage levels matched or exceeded legal minimum wage.

The cost breakdown which Nudie Jeans receives from the supplier includes sewing, cutting and washing costs, the exact share that goes to workers per style is currently not known for all production locations. In 2019, the member brand had more in-depth discussions with two suppliers in Turkey and Tunisia to work on open costing. This process has not been finalised and will continue into 2020.

In the current onboarding of new suppliers, the topic of open costing and transparency is discussed and weighed in the sourcing decision.

Recommendation: Nudie Jeans is encouraged to provide buyers (or other employees involved in price negotiations with suppliers) training on cost breakdown.

Nudie Jeans could provide suppliers who don't use open costing, training on product costing and how to quote prices including (direct and indirect) labour costs.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.9 Member company actively responds if production locations fail to pay legal minimum wages and/or fail to provide wage data to verify minimum wage is paid.	Yes	If a supplier fails to pay minimum wage or minimum wage payments cannot be verified, FWF member companies are expected to hold management of the supplier accountable for respecting local labour law. Payment below minimum wage must be remediated urgently.	Complaint reports, CAPs, additional emails, FWF Audit Reports or additional monitoring visits by a FWF auditor, or other documents that show minimum wage issue is reported/resolved.	0	0	-2

Comment: The brand was able to show that it had actively responded to supplier not paying legal minimum wages or failing to provide wage data. In 2019, 3 non-compliant issues were raised at different facilities. After the issues were raised the brand swiftly followed up to remediate the issues together with other Fair Wear member brands sourcing from the same facilities. In one case the issue is still waiting for final verification but the factory has mentioned they solved the issue.

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	Ο	-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.	Advanced	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	6	6	0

Comment: Nudie Jeans acknowledges the issue of payment of living wages as an important topic throughout its supply chain and is a focus area for the brand. Nudie Jeans has been paying its share of the living wage to an Indian supplier since 2013. The member brand chose its Indian suppliers because it would have a significant impact on the local workforce. Since 2016 Nudie Jeans expanded the payment of living wages to another Indian supplier and included the spinning division at the same (vertically integrated) supplier. In 2019, Nudie Jeans expanded to its project to the knitting and dyeing units at the same supplier.

For Tunisia, the brand is in discussion with its most important supplier on how they could work on addressing living wage but are yet to find solutions pertaining to complexities on how to include the workers. Therefore, the member brand is looking into a transformative training on social dialogue to open up the way for payment of a living wage. The brand, however, still needs to solve the financial challenges that this training brings. Together with Fair Wear, the member brand is looking into ways to lower the costs of the training.

Although Fair Wear acknowledges the work of Nudie Jeans on this topic over the past years, we have lowered the score to intermediate to respond to the slower progress on this topic.

Recommendation: Fair Wear encourages Nudie Jeans to involve worker representatives and local organisations in assessing the root causes of wages lower than living wages. It is advised that the outcomes of the root cause analysis are discussed internally and with top management, to form a basis for an embedded strategy.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.12 Percentage of production volume from factories owned by the member company (bonus indicator).	None	Owning a supplier increases the accountability and reduces the risk of unexpected CoLP violations. Given these advantages, this is a bonus indicator. Extra points are possible, but the indicator will not negatively affect an member company's score.	Supplier information provided by member company.	N/A	2	ο

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	6	0

Comment: Nudie Jeans acknowledges the issue of payment of living wages as an important topic throughout its supply chain and is a focus area for the brand. Nudie Jeans has been paying its share of the living wage at two units of an Indian supplier since 2016 and has extended this to the knitting and spinning units of this supplier in 2019. At this vertically integrated facility, the wages are discussed in the worker committee and workers suggest on how to structure the pay-out of the living wage factor. In 2019, the member brand also started paying their share of the living wage in another Indian production location.

Fair Wear acknowledges the work of Nudie Jeans in the Indian production locations which is a fundamental part of its supply chain. Nevertheless, we have given an intermediate score to encourage Nudie Jeans to roll out its experience on this topic to other production locations in their supply chain.

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.14 Percentage of production volume where the member company pays its share of the target wage.	8%	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.	2	6	Ο

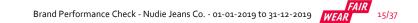
Comment: Nudie Jeans has 56% of its production volume from non-low-risk countries and currently pays its share of the agreed living wage benchmark at two Indian suppliers which make up 8% of its FOB from non-low-risk countries. The brand made a further analysis in terms of the number employees in their supply chain paid a living wage. As the Indian production locations represent a large share of the total workforce, Nudie Jeans calculated that 34% of the workers in their supply chain are receiving Nudie Jeans' share of a living wage.

Recommendation: We encourage Nudie Jeans to show that discussions and plans for wage increases have resulted in the payment of a target wage.

Nudie Jeans is encouraged to roll out its approach to other suppliers.

Purchasing Practices

Possible Points: 52 Earned Points: 35



2. Monitoring and Remediation

Basic measurements	Result	Comments
% of production volume where approved member own audit(s) took place.	0%	
% of production volume where approved external audits took place.	0%	
% of production volume where Fair Wear audits took place.	53%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.	44%	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.)
% of production volume where an audit took place.		
Member meets monitoring requirements for tail-end production locations.	Yes	
Requirement(s) for next performance check		
Total monitoring threshold:	97%	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: In 2019, the monitoring program and activities were coordinated through the Sustainability manager and the Manager of the Product Development 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	Ο	-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: Nudie Jeans shares audits reports, discusses CAP and agrees on timelines with its production locations in a timely manner. In case worker representation is present at a production location, the factory management is asked to share the audits with the worker representation.

Recommendation: Before an audit takes place, Nudie Jeans 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.

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.	Intermediate	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.	6	8	-2

Comment: Nudie Jeans showed that it takes a proactive approach to remediate audit findings and involves local organisations in the audit and CAP follow-up. The brand's monitoring system includes the commissioning of audits following the Fair Wear methodology in low-risk countries. In 2019, the brand had in total 15 audits at both main suppliers and subcontractors. Seven Fair Wear audits in high-risk countries and 8 external audits in low-risk countries were conducted on behalf of Nudie Jeans. The brand was able to show that it had followed up on the CAPs with its suppliers.

Recommendation: Fair Wear encourages Nudie Jeans to continue strengthening its system to analyse how they might have contributed to findings and what changes they can make in their purchasing practices.

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.	99%	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: Production locations are often visited by the brand, including subcontractors and spinning mills. Visits from the headquarters are made jointly with the buying and product development department. There is a joint agenda during the visits of which sustainability and social issues are a part of the agenda. Discussing labour standards and monitoring working conditions is also part of the visits made by local staff and/or consultants.

When somebody from another department travels to a production location, this person can follow up on CSR issues as well. All notes and CAP follow-up are stored on a common server, incl. travel report.

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: BSCI reports are also collected or at least shared on-site during meetings at the production locations. The quality of the audits is assessed by the Sustainability manager and remarkable issues raised in conversation with the factory management.

If needed, the CAPs of these audit reports are taken along in the overall remediation process as was the case in Turkey and Portugal.

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.	5	6	-2
Compliance with FWF enhanced monitoring programme Bangladesh	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF Myanmar policy	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on abrasive blasting	Advanced			6	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: Tunisia: A risk specific for Tunisia, the most important sourcing country for Nudie Jeans in terms of FOB, is the use of short-term contracts, which leads to precarious employment. Nudie Jeans discussed the issue with their Tunisian suppliers. Over the past years, the largest supplier of Nudie Jeans has been able to reduce short-term contracts, but the issue remains difficult to solve.

Turkey: Nudie Jeans has had conversations about the employment of Syrian refugees with their two Turkish suppliers but they do not see a reason to actively employ them. There are no indications of employment of Syrian refugees in the FWF audits. The suppliers do not have a policy in place for the registration of Syrian employees. Nudie Jeans shared FWF guidance on the employment of Syrian refugees with the suppliers. Nudie Jeans actively follows the political developments in Turkey, visits the suppliers regularly and checks on subcontracting through the FWF audits. In 2019, Nudie Jeans attended a training on child labour in the lower tiers of their Turkish supply chain and discussed a complaint system at the lower tiers as well.

India: Nudie Jeans is well aware of the country-specific risks in India, relating to violence against women, employing young workers and sumangali(-like) schemes, and shows advanced steps to address these. The main Indian suppliers have been enrolled in the Fair Wear Workplace Education Programmes addressing violence against women. They have also participated in the supervisory skill-building programme to improve relationships between supervisors and workers and reduce economic discrimination of women. The Indian factories have also installed anti-harassment committees (as required by law), and the company receives reports about their meetings. The gap between the legal minimum wage and living wage is addressed with the living wage projects in which Nudie Jeans pays out their share of the living wage.

Nudie Jeans does not source in Bangladesh or Myanmar and sandblasting is forbidden as per Nudie Jeans policy which is included in the brand's Code of Conduct that factories have to comply with.

Recommendation: Knowing the country-specific risks facilitates the starting point for discussing this with suppliers. Member companies can agree on additional commitments that are required to mitigate 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: During 2019, Nudie Jeans cooperates with other Fair Wear members that are using the same suppliers. Nudie Jeans commonly takes the lead. The brand is also engaged in the Italy Fashion Working Group which is an initiative where several brands share experiences and collaborate to improve labour standards in the Italian supply chain.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.9 Percentage of production volume where monitoring requirements for low-risk countries are fulfilled.	50-100% AND member undertakes additional activities to monitor suppliers	Low-risk countries are determined by the presence and proper functioning of institutions which can guarantee compliance with national and international standards and laws. FWF has defined minimum monitoring requirements for production locations in low-risk countries.	Documentation of visits, notification of suppliers of FWF membership; posting of worker information sheets, completed questionnaires.	3	3	0

Comment: In 2019, the brand organised audits (using the Fair Wear audit methodology) for 8 suppliers in Italy and Portugal besides fulfilling the low-risk requirements.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.10 Extra bonus indicator: in case FWF member company conducts full audits at tail-end production locations (when the minimum required monitoring threshold is met).	Yes	FWF encourages its members to monitor 100% of its production locations and rewards those members who conduct full audits above the minimum required monitoring threshold.	Production location information as provided to FWF and recent Audit Reports.	2	2	0

Comment: The brand has conducted full audits at tail-end production locations in India and Tunisia beyond the minimum required monitoring threshold.

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	Ο

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: 29

3. Complaints Handling

Basic measurements	Result	Comments
Number of worker complaints received since last check	2	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	2	

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 Sustainability manager who is responsible for Nudie Jeans overall sustainability work is also the designated contact point for the social aspects and addressing 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 supplier visits, Nudie Jeans always checks whether the Fair Wear Code of Labour Practices is posted at the factory. Buyers send pictures to the Sustainability manager after each visit and the brand documents this for future reference.

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.	85%	After informing workers and management of the FWF CoLP and the complaints hotline, additional awareness raising and training is needed to ensure sustainable improvements and structural worker- management dialogue.	Training reports, FWF's data on factories enrolled in the WEP basic module. For alternative training activities: curriculum, training content, participation and outcomes.	6	6	0

Comment: In the last three years, the brand organized WEP Basic training at three production locations in Tunisia and Turkey.

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: In 2019, Nudie Jeans worked with two incoming complaints. Nudie Jeans supports open internal dialogue at their suppliers, and collaborates with their suppliers to remediate the complaints.

In one case the complainant had been working as a tailor in the factory for the last few years. As a practice, occasionally the worker was asked to work amongst the piece-rate workers. There were some arguments between the supervisor and complainant regarding the location in the factory, whether to work with the piece-rate workers or in the tailoring position. Thereafter there were further discussions around verbal abuse, resignation and settlement payments. The factory has been willing to discuss the case with the complainant and the FWF team. The case was closed in February 2020 when the complainant dropped the case.

In another case the complainant joined the factory in January 2012 as a helper, resigned in 2018 but rejoined in March 2019. The worker applied for Provident Fund settlement for the period 2012-2018 but did not receive it. Factory management repeatedly told the complainant that the worker would receive the settlement soon. However, this did not happen. Factory management explained that the employer's approval is not required for Provident Fund withdrawal, the universal account number (UAN) and the company ID are necessary for the Provident Fund office to trace the worker's details. The Fair Wear complaint handler contacted the complainant to know whether the worker would be willing to disclose his/her name. The complainant confirmed to have received the UAN from the factory and no longer needed help with the complaint. The complaint was closed in August 2019.

The factory worked collaboratively to make more information in other Indian languages available, hire extra HR staff to meet and improved dialogue with the employees. Examples of the extra investment are better and explanation and education on how to read payslips and understanding how to get your benefits.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.5 Cooperation with other customers in addressing worker complaints at shared suppliers.	Active cooperation	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.	2	2	0

Comment: In 2019, the brand received complaints at shared suppliers. The brand worked closely with other Fair Wear members but was leading the communication.

Complaints Handling

Possible Points: 17 Earned Points: 17

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: Nudie Jeans organises trainings on FWF membership for all global sales staff, which are included in kick-off collections meetings. In-store training for retail staff takes place at least once a year, to make sure sales staff can convey Nudie Jeans values to the end consumers.

Monthly sustainability newsletters, with results of audits or suppliers visits updates, are sent to the whole organization, including stores. Sustainability is part of the core business of Nudie Jeans and thus all staff integrates the related requirements in their daily work. That apart, the brand now has a dashboard for sustainability-related updates as part of its internal project management system.

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: Nudie Jeans' production staff has regular meetings with purchasing, product development and sustainability staff to discuss status of improvement at a supplier level. Nudie Jeans sustainability staff regularly attends FWF events and webinars. Production teams and sustainability staff try to be present at audit closing meetings at the factories, although it did not happen in 2019.

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: In Italy, Tunisia, Portugal, Turkey and India, Nudie Jeans collaborates with agents who support quality control and production planning. They also actively contribute to the implementation of the Fair Wear Code of Labour Practices. These agents are responsible for explaining the questionnaire in the local language and are involved in CAP follow-up.

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.	3%	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.	1	6	0

Comment: In the last three years, the brand organized WEP Violence Prevention module at a production location in India and a WEP factory dialogue in a Turkish production location.

Recommendation: Fair Wear recommends Nudie Jeans 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 Fair Wear's Workplace Education Programme communication or violence prevention module or implement advanced training through service providers or brand staff. Fair Wear guidance on good quality training is available on the Member Hub.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.5 Degree to which member company follows up after a training programme.	Active follow- up	After factory-level training programmes, complementary activities such as remediation and changes on brand level will achieve a lasting impact.	Documentation of discussions with factory management and worker representatives, minutes of regular worker-management dialogue meetings or anti-harassment committees.	2	2	0

Comment: The member brands showed active follow up with the Turkish and Indian supplier. However, the challenge remains to assure that the other workers in the production locations will be involved.

Recommendation: Fair Wear recommends Nudie Jeans to discuss outcomes of dialogue sessions with their supplier and what steps management is planning to further strengthen dialogue between workers and management. This may include holding an independent worker representative election; regular meetings between worker representatives and management to discuss improvements to working conditions or allowing worker representatives to conduct a worker survey on specific issues. Nudie Jeans should also investigate how they can contribute to implementing the action plan workers and management have agreed on (e.g. by adjusting sourcing practices).

Training and Capacity Building

Possible Points: 13 Earned Points: 8

5. Information Management

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
5.1 Level of effort to identify all production locations.	Intermediate	Any improvements to supply chains require member companies to first know all of their production locations.	Supplier information provided by member company. Financial records of previous financial year. Documented efforts by member company to update supplier information from its monitoring activities.	3	6	-2

Comment: Transparency is a high priority of Nudie Jeans. A supplier transparency agreement is signed between the supplier and Nudie Jeans disclosing all factory information, the number of workers and subcontractor information. In Italy, Nudie Jeans audits subcontractors used for specific prints (jeans pocket prints) as well as fabric manufacturing.

Last year, the product development manager was more involved in order to align product development with transparency. The product development department and sustainability department have been working together more to stabilise the number of product locations.

In Portugal and India, production agents keep track of any new suppliers or subcontractors. They are present daily at the production sites when the orders for Nudie Jeans are being made. Nudie Jeans is aware of the exact capacity of suppliers and their production lines, and therefore the local staff can check if all production for Nudie Jeans takes place at the specific locations. The brand has invested a lot of time in the past two years to map all subcontractors in its supply chain. The subcontractors are all included in their monitoring system and audited.

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: Nudie Jeans implements coordinated efforts between the Sustainability manager and the manager of the Product Development Department. The production staff is informed about the outcome of audits. They are also briefed by the Sustainability manager before visiting suppliers. They receive a list of questions to check on during the visit. Buyers and product managers also sometimes observe audits.

A supplier dashboard and folders containing visit reports ensure that new information is documented, updated and available for the concerned teams.

Information Management

Possible Points: 7 Earned Points: 4

6. Transparency

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.1 Degree of member company compliance with FWF Communications Policy.	Minimum communications requirements are met AND no significant problems found	FWF's communications policy exists to ensure transparency for consumers and stakeholders, and to ensure that member communications about FWF are accurate. Members will be held accountable for their own communications as well as the communications behaviour of 3rd-party retailers, resellers and customers.	FWF membership is communicated on member's website; other communications in line with FWF communications policy.	2	2	-3

Comment: Nudie Jeans communicates about Fair Wear through the company website. That apart they use social media (twitter, facebook, and Instagram) to redirect consumers and other stakeholders to sustainability-related content on their website.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.2 Member company engages in advanced reporting activities.	Supplier list is disclosed to the public.	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.	2	2	0

Comment: Nudie Jeans has signed the Transparency Pledge and annually discloses its production locations with information, including subcontractors and audit summaries, in their production guide on their website.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.3 Social Report is submitted to FWF and is published on member company's website.	Complete and accurate report submitted to FWF AND published on member's website.	The social report is an important tool for members to transparently share their efforts with stakeholders. Member companies should not make any claims in their social report that do not correspond with FWF's communication policy.	Social report that is in line with FWF's communication policy.	2	2	-1

31/37

Transparency

Possible Points: 6

Earned Points: 6

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: CSR priorities are set in cooperation with the production department and Sustainability manager. Since late 2017, the Sustainability manager is part of the management group.

The CEO is committed to CSR, but leaves execution to the Sustainability manager. The CEO is updated on all social compliance and FWF related updates such as the transparency policy.

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.	100%	In each Brand Performance Check report, FWF may include requirements for changes to management practices. Progress on achieving these requirements is an important part of FWF membership and its process approach.	Member company should show documentation related to the specific requirements made in the previous Brand Performance Check.	4	4	-2

Comment: In last year's performance check Nudie Jeans received one requirement on indicator 1.3: Nudie Jeans needs to ensure that new production locations sign and return the questionnaire before first orders are placed.

The brand followed up on this requirement.

Evaluation

Possible Points: 6

Earned Points: 6

Recommendations to Fair Wear

- The upload file size of Fair force is too low
- Show relevant audit findings also to brands in FairForce
- Show how many workers (% of total workers)
- Go deeper in the tiers
- Align CAP follow-up better when multiple brands source in one factory.
- Extend the transparency chapter, make it more prominent and weigh it stronger.
- Fairforce is a big improvement.

Scoring Overview

Category	Earned	Possible
Purchasing Practices	35	52
Monitoring and Remediation	29	30
Complaints Handling	17	17
Training and Capacity Building	8	13
Information Management	4	7
Transparency	6	6
Evaluation	6	6
Totals:	105	131

Benchmarking Score (earned points divided by possible points)

80

Performance Benchmarking Cate	gory

Leader

Brand Performance Check details

Date of Brand Performance Check:

18-05-2020

Conducted by:

Jesse Bloemendaal

Interviews with:

Sandya Lang - Sustainability manager