



## **Brand Performance Check**

### **ROOTS for Safety B.V.**

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 [www.fairwear.org](http://www.fairwear.org). The online [Brand Performance Check Guide](#) provides more information about the indicators.

# Brand Performance Check Overview

## ROOTS for Safety B.V.

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

Member company information	
Headquarters:	Hoogvliet , Netherlands
Member since:	2003-06-30
Product types:	Workwear, Footwear
Production in countries where Fair Wear is active:	China, Romania, Tunisia
Production in other countries:	Germany, Italy, Poland
Basic requirements	
Workplan and projected production location data for upcoming year have been submitted?	Yes
Actual production location data for evaluation period was submitted?	Yes
Membership fee has been paid?	Yes
Scoring overview	
% of own production under monitoring	98%
Benchmarking score	50
Category	Good

## **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:

ROOTS for Safety has met most of FAIR WEAR's performance requirements. The member brand's total benchmarking score of 50 is just enough to be placed in the 'Good' category. ROOTS for Safety surpasses Fair Wear's monitoring threshold for members after three years of membership by monitoring 98% of production.

ROOTS for Safety works with one main supplier, located in China, which covers nearly 90% of its production volume. In 2019, this main supplier announced the termination of the relationship due to it receiving a bigger customer which takes up most of the supplier's capacity. This made it difficult to work on the follow up of CAPs. ROOTS for Safety is encouraged to thoroughly conduct due diligence at the replacement supplier and proactively work on the remediation of CAPs.

Tunisia was entered as a new production country in 2019 and the member was able to show due diligence efforts, having managed to identify the main risks. Fair Wear recommends ROOTS for Safety to define preventive actions for the identified risks and connect them to sourcing decisions.

Requirements given in the previous brand performance check, all of which related to living wages, were not met. Fair Wear encourages ROOTS for Safety to work more actively on this topic. The first step in this process is getting insight into the link between buying prices and wages through open costing.

In 2018, ROOTS for Safety made changes in its production planning to address the risk of overtime. However, no audits were done in 2019 to verify the expected positive impact.

## 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:** ROOTS for Safety works with one main supplier in China which accounts for 89% of its total production volume. The member brand is responsible for 20% of this supplier's production capacity.

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.	1%	FWF provides incentives to clothing brands to consolidate their supplier base, especially at the tail end, as much as possible, and rewards those members who have a small tail end. Shortening the tail end reduces social compliance risks and enhances the impact of efficient use of capital and remediation efforts.	Production location information as provided to FWF.	3	4	0

**Comment:** In 2019, 1% of ROOTS for Safety's production volume came from production locations where member company buys less than 2% of its total FOB.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.2 Percentage of production volume from production locations where a business relationship has existed for at least five years.	94%	Stable business relationships support most aspects of the Code of Labour Practices, and give production locations a reason to invest in improving working conditions.	Supplier information provided by member company.	4	4	0

**Comment:** In 2019, 94% of ROOTS for Safety's production volume was bought from production locations where a business relationship has existed for at least five years. ROOTS for Safety strongly believes in the importance of maintaining long term relationships with suppliers in order to assure better collaboration and improve consistency in production quality.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.3 All (new) production locations are required to sign and return the questionnaire with the Code of Labour Practices before first bulk orders are placed.	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, ROOTS for Safety started working with one new production location in Tunisia. The member company could show document proof that both questionnaire and Code of Labour Practices were signed before first bulk orders were placed.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.4 Member company conducts human rights due diligence at all (new) production locations before placing orders.	Intermediate	Due diligence helps to identify, prevent and mitigate potential human rights problems at suppliers.	Documentation may include pre-audits, existing audits, other types of risk assessments.	2	4	0

**Comment:** ROOTS for Safety uses the help of consultants to source new locations. As part of their check list for selecting new production locations, all potential locations must be visited first. During this visit, some basic information is gathered including other customers producing at the suppliers, and any existing audits. The current working conditions are assessed using the FWF health and safety checklist and photos are taken to document the visual inspection. The final decision to source at new suppliers is made after this prior evaluation by the management team, with the input of the CSR person to block a supplier in case the visual inspection does not meet a minimum standard. ROOTS for Safety's CSR manager arranges quarterly reminders to follow up on existing suppliers, including discussions of on going remediation processes.

In 2019, ROOTS for Safety entered a new production country, namely Tunisia. Due diligence was done by consulting Fair Wear on specific risks in this country. External reports were requested, but none were available. Intermediate steps were taken, but there is no written procedure in place. Nevertheless, commitment to the CoLP and a signed questionnaire are required. As part of ROOTS for Safety's ISO certifications a matrix is used with various requirements to on-board a new supplier. These requirements include CSR conditions.



**Recommendation:** A risk analysis as part of the decision-making process of selecting new production locations is an important step to mitigate risk and prevent potential problems. Fair Wear recommends ROOTS for Safety B.V. to clearly define preventive actions for identified risks and connect them to sourcing decisions. This also includes strategies to tackle structural risks such as low wage levels in the country, limited freedom of association and restricted civil society that are beyond the brand's individual sphere of influence. Fair Wear advises to use information from Fair Wear country studies and wage ladders and use the Fair Wear Health and Safety guidelines. ROOTS for Safety B.V. can use the CSR Risk Check (<https://www.mvorisicochecker.nl/en/risk-check>) to further assess the risks in (potential new) sourcing countries. For gender risk assessments, ROOTS for Safety B.V. can use the gender-toolkit that has fact-sheets per country, supplier checklists and a model policy on Sexual Harassment. ROOTS for Safety B.V. can cooperate with local stakeholders to further investigate the situation in a specific country, particularly with regards to short-term contracting in Tunisia. Fair Wear can offer information on local stakeholders.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.5 Production location compliance with Code of Labour Practices is evaluated in a systematic manner.	Yes	A systemic approach is required to integrate social compliance into normal business processes, and supports good decisionmaking.	Documentation of systemic approach: rating systems, checklists, databases, etc.	1	2	0

**Comment:** The majority of ROOTS for Safety garments are produced at their main supplier in China. A production manager based in China is responsible for assessing quality compliance. The production manager works together with the CSR manager, based at the headquarters in The Netherlands. The CSR manager is responsible for the remainder of the suppliers. Each factory is individually evaluated based on total orders, partial delivery, delays, prices monitored, quality management system, quality of product and invoicing. Additionally, compliance with Code of Labour Practices is evaluated as part of the social and environmental standards assessment per supplier.

ROOTS for Safety checks at least annually on posted CoLP in factories, and uses quarterly compliance checks to discuss CAPs as well as any ongoing quality issues at the factories. This evaluation is being done at individual supplier basis, and information is saved in an overview of suppliers status. This overview helps to better monitor compliance with Code of Labour Practices, however it is not yet completed in a systematic way, and sometimes ad-hoc based on ongoing issues at factory. The evaluation outcomes do not formally influence ROOTS for Safety's production decisions yet.

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.6 The member company's production planning systems support reasonable working hours.	General or ad-hoc system.	Member company production planning systems can have a significant impact on the levels of excessive overtime at production locations.	Documentation of robust planning systems.	2	4	0

**Comment:** ROOTS for Safety has a constant stock of high-in-demand ready made products in stock at the factory. The production manager and logistics manager work closely together with their forecasting system to assess exact demand for their products.

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

Available stock is monitored monthly, which enables a stable workflow throughout the year avoiding peak seasons. Lead times for special orders is six months, with greige fabric already in house, with enough reserves built in to prevent excessive overtime.

The production manager checks with the factory manager occasionally whether their planning is feasible.

**Recommendation:** Fair Wear recommends ROOTS for Safety B.V. to learn more about the standard minute per style and how the production of its products impacts the total production capacity of the factory.

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

**Comment:** Excessive overtime was found in the audit conducted by Fair Wear in November 2018, ROOTS for Safety only received the report in January 2019. Follow up on progress of individual findings was expected to be done in 2019. Correspondence on CAP follow up was shown, from the first quarter of 2019. Unfortunately, shortly after this, ROOTS for Safety was forced to end the relationship with its main supplier. Reason for this is the factory's sudden unannounced 4% price increase, while competitors lowered their prices due to tax decrease. A bigger customer, taking up most of the supplier's capacity was given priority.

Since this decision was not in ROOTS for Safety's hands and efforts could be shown, scoring for intermediate efforts are granted and a proactive role in the main supplier's successor is expected of the member brand.

**Requirement:** ROOTS for Safety B.V. should investigate to what extent its current buying practices has an effect on the working hours at supplier level. A root cause analysis of excessive overtime should be done to investigate which steps can be most effective to reduce overtime.

**Recommendation:** Besides discussing it with the supplier and assessing root causes, Fair Wear strongly recommends ROOTS for Safety B.V. to actively take measures when excessive overtime is found. Taking measures to ensure that ROOTS for Safety B.V. knows and shows whether excessive overtime takes place at a supplier is key in resolving the issue. Measures such as regular checks by the local technician, documents checking and interviewing workers help assess whether excessive overtime takes place.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.8 Member company can demonstrate the link between its buying prices and wage levels in production locations.	Insufficient	Understanding the labour component of buying prices is an essential first step for member companies towards ensuring the payment of minimum wages – and towards the implementation of living wages.	Interviews with production staff, documents related to member's pricing policy and system, buying contracts.	0	4	0

**Comment:** The CSR manager has shown efforts in convincing its main supplier in China to provide insight in cost breakdown per product. Despite the efforts made, the supplier refuses to be transparent about this. ROOTS for Safety did receive a wage list, figures on minimum wages and local living wage estimates from the factory manager. It is strongly advised to crosschecks this information with the figures provided in Fair Wear's audit reports.

Price discounts are never asked for by ROOTS for Safety and buying prices are stable.

For their more technical products produced in Europe, ROOTS for Safety is aware of labour minutes and price breakdown as well as costs for material and finishing costs. However this is for a very small range of high standards products that need to meet the European safety certifications

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

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.9 Member company actively responds if production locations fail to pay legal minimum wages and/or fail to provide wage data to verify minimum wage is paid.	No problems reported/no audits	If a supplier fails to pay minimum wage or minimum wage payments cannot be verified, FWF member companies are expected to hold management of the supplier accountable for respecting local labour law. Payment below minimum wage must be remediated urgently.	Complaint reports, CAPs, additional emails, FWF Audit Reports or additional monitoring visits by a FWF auditor, or other documents that show minimum wage issue is reported/resolved.	N/A	0	-2

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.10 Evidence of late payments to suppliers by member company.	No	Late payments to suppliers can have a negative impact on production locations and their ability to pay workers on time. Most garment workers have minimal savings, and even a brief delay in payments can cause serious problems.	Based on a complaint or audit report; review of production location and member company financial documents.	0	0	-1

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.11 Degree to which member company assesses and responds to root causes for wages that are lower than living wages in production locations.	Insufficient	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach	Evidence of how payment below living wage was addressed, such as: Internal policy and strategy documents, reports, correspondence with factories, etc	0	6	0

**Comment:** In 2019, living wage has been part of the discussions with their main supplier in China and ROOTS for Safety tried to get a better insight in the cost breakdown of the garments.

Instead of cost breakdown, the member company received a general wage list and living wage estimates from this supplier. This information is not yet analysed and should be compared with the information on wages provided by the audit team in China, as can be found in the most recent audit report. Furthermore, living wages has not been discussed with other suppliers yet.

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.12 Percentage of production volume from factories owned by the member company (bonus indicator).	None	Owning a supplier increases the accountability and reduces the risk of unexpected CoLP violations. Given these advantages, this is a bonus indicator. Extra points are possible, but the indicator will not negatively affect an member company's score.	Supplier information provided by member company.	N/A	2	0

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.13 Member company determines and finances wage increases.	None	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach.	Evidence of how payment below living wage was addressed, such as: internal policy and strategy documents, reports, correspondence with factories, etc.	0	6	0

**Comment:** Due to the phasing out of ROOTS for Safety's main supplier, wage increase plans have been postponed, as the new factory will first be audited and be participating in a FWF WEP training in 2020.

**Requirement:** ROOTS for Safety should analyse what is needed to increase wages and develop a strategy to finance the costs of wage increases. To support analysing the wage gap, FWF has developed a calculation model that estimates the effect on FOB and retail prices under different pricing models.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.14 Percentage of production volume where the member company pays its share of the target wage.	0%	FWF member companies are challenged to adopt approaches that absorb the extra costs of increasing wages.	Member company's own documentation, evidence of target wage implementation, such as wage reports, factory documentation, communication with factories, etc.	0	6	0

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

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

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## **Purchasing Practices**

**Possible Points: 52**

**Earned Points: 21**

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## 2. Monitoring and Remediation

Basic measurements	Result	Comments
% of production volume where approved member own audit(s) took place.		
% of production volume where approved external audits took place.		
% of production volume where Fair Wear audits took place.	87%	
% of production volume where an audit took place.	87%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.	11%	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.)
Member meets monitoring requirements for tail-end production locations.	N/A	
Total monitoring threshold:	98%	Measured as percentage of production volume (Minimums: 1 year: 40%; 2 years 60%; 3 years+: 80-100%)

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.1 Specific staff person is designated to follow up on problems identified by monitoring system.	Yes	Followup is a serious part of FWF membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	2	2	-2

**Comment:** The Corporate Social Responsibility (CSR) & Quality, Health, Safety, Environment (QHSE) Manager is ultimately responsible to follow up on problems identified by the monitoring system. In practice, the production manager based in China is responsible for following up directly with the main supplier on remediation.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.2 Quality of own auditing system meets FWF standards.	Member makes use of FWF audits and/or external audits only	In case FWF teams cannot be used, the member companies' own auditing system must ensure sufficient quality in order for FWF to approve the auditing system.	Information on audit methodology.	N/A	0	-1



Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.3 Audit Report and Corrective Action Plan (CAP) findings are shared with factory and worker representation where applicable. Improvement timelines are established in a timely manner.	Yes	2 part indicator: FWF audit reports were shared and discussed with suppliers within two months of audit receipt AND a reasonable time frame was specified for resolving findings.	Corrective Action Plans, emails; findings of followup audits; brand representative present during audit exit meeting, etc.	2	2	-1

**Comment:** ROOTS for Safety shares audit reports and CAPs with the factory and progress is monitored during factory visits by the production manager based in China, this information is shared and discussed with CSR manager via regular calls and emails. There are no worker representatives present at the main production location, but ROOTS for Safety is aware that audit reports and CAPs should be shared with them as well, where applicable.

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.	Insufficient	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.	-2	8	-2

**Comment:** The most recent audit was done in November 2018. The production manager has been in contact with the factory management and one update with minor improvements was shared in March 2019.

Due to the announced phase out of this supplier no further steps have been taken by ROOTS for Safety.

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

**Recommendation:** Fair Wear also recommends ROOTS for Safety B.V. to gradually ensure factories establish independent worker representation and involve these representatives in monitoring and remediation of findings.

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.	93%	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:** The main supplier in China and its subcontractor are regularly visited. Also, the new production location in Tunisia and the supplier in Germany were visited in 2019. This covers 93% of the total production volume.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.6 Existing audit reports from other sources are collected.	No existing reports/all audits by FWF or FWF member company	Existing reports form a basis for understanding the issues and strengths of a supplier, and reduces duplicative work.	Audit reports are on file; evidence of followup on prior CAPs. Reports of quality assessments.	N/A	3	0

**Comment:** No existing audit reports were collected, as the suppliers indicated that none were available.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.7 Compliance with FWF risk policies.	Average score depending on the number of applicable policies and results	Aside from regular monitoring and remediation requirements under FWF membership, countries, specific areas within countries or specific product groups may pose specific risks that require additional steps to address and remediate those risks. FWF requires member companies to be aware of those risks and implement policy requirements as prescribed by FWF.	Policy documents, inspection reports, evidence of cooperation with other customers sourcing at the same factories, reports of meetings with suppliers, reports of additional activities and/or attendance lists as mentioned in policy documents.	3	6	-2
Compliance with FWF enhanced monitoring programme Bangladesh	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF Myanmar policy	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on abrasive blasting	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on risks related to Turkish garment factories employing Syrian refugees	Policies are not relevant to the company's supply chain			N/A	6	-2
Other risks specific to the member's supply chain are addressed by its monitoring system	Intermediate			3	6	-2

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

ROOTS for Safety acknowledges the risk of excessive overtime, freedom of association, issues around social insurances in China and mostly the government influence on factory decisions.

However, ROOTS for Safety feels that their Chinese supplier has a relatively safe production location, having gained years of experience of it as their main sourcing location. ROOTS for Safety had an understanding of the general risks that come with working in China including workers wanting to work overtime to save up days to take during holiday. ROOTS for Safety is adamant that this is not the case for their suppliers, and wants to make sure that workers go home after working hours. Member company's staff based in China actively monitor this, as they are present on a weekly basis.

For the new sourcing country Tunisia, ROOTS for Safety is aware of the general risks and discusses them in the recurring meetings.

No further actions taken, which means the recommendation to participate in country specific trainings and/or webinar will remain valid.

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.8 Member company cooperates with other FWF member companies in resolving corrective actions at shared suppliers.	No CAPs active, no shared production locations or refusal of other company to cooperate	Cooperation between customers increases leverage and chances of successful outcomes. Cooperation also reduces the chances of a factory having to conduct multiple Corrective Action Plans about the same issue with multiple customers.	Shared CAPs, evidence of cooperation with other customers.	N/A	2	-1

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.9 Percentage of production volume where monitoring requirements for low-risk countries are fulfilled.	50-100%	Low-risk countries are determined by the presence and proper functioning of institutions which can guarantee compliance with national and international standards and laws. FWF has defined minimum monitoring requirements for production locations in low-risk countries.	Documentation of visits, notification of suppliers of FWF membership; posting of worker information sheets, completed questionnaires.	2	3	0

**Comment:** ROOTS for Safety fulfilled the monitoring requirements for its production volume in low-risk countries. The production locations in low-risk countries were visited; during visits suppliers are informed of Fair Wear membership and completed CoLP questionnaires were returned before production orders were placed.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.10 Extra bonus indicator: in case FWF member company conducts full audits at tail-end production locations (when the minimum required monitoring threshold is met).	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

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## Monitoring and Remediation

**Possible Points: 27**

**Earned Points: 12**

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### 3. Complaints Handling

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.1 A specific employee has been designated to address worker complaints.	Yes	Followup is a serious part of FWF membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	1	1	-1

**Comment:** The CSR manager is responsible for 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:** For each of the suppliers an annual check is done to verify whether the posted Worker Information Sheet is (still) in place. This is done by local staff or by the CSR manager via email with photographic proof of posting.

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.	87%	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:** The main supplier in China participated in a WEP basic training in 2017. This training is valid for three years.

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.4 All complaints received from production location workers are addressed in accordance with the FWF Complaints Procedure.	No complaints received	Providing access to remedy when problems arise is a key element of responsible supply chain management. Member company involvement is often essential to resolving issues.	Documentation that member company has completed all required steps in the complaints handling process.	N/A	6	-2

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.5 Cooperation with other customers in addressing worker complaints at shared suppliers.	No complaints or cooperation not possible / necessary	Because most production locations supply several customers with products, involvement of other customers by the FWF member company can be critical in resolving a complaint at a supplier.	Documentation of joint efforts, e.g. emails, sharing of complaint data, etc.	N/A	2	0



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## Complaints Handling

**Possible Points: 9**

**Earned Points: 9**

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## 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:** Fair Wear membership is annually discussed with the management team. Information on Fair Wear is shared internally with all staff in meetings on an annual basis. General information is also shared with the communications team.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.2 All staff in direct contact with suppliers are informed of FWF requirements.	Yes	Sourcing, purchasing and CSR staff at a minimum should possess the knowledge necessary to implement FWF requirements and advocate for change within their organisations.	FWF Seminars or equivalent trainings provided; presentations, curricula, etc.	2	2	-1

**Comment:** The production manager in China and the CSR manager have regular talks about social compliance. Given the close collaboration, all essential information is shared during their weekly meetings. For the remaining supplier, the CSR manager is closely involved, as this person is also the Quality responsible.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices.	Member does not use agents/contractors	Agents have the potential to either support or disrupt CoLP implementation. It is the responsibility of member company to ensure agents actively support the implementation of the CoLP.	Correspondence with agents, trainings for agents, FWF audit findings.	N/A	2	0

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.4 Factory participation in training programmes that support transformative processes related to human rights.	0%	Complex human rights issues such as freedom of association or gender-based violence require more in-depth trainings that support factory-level transformative processes. FWF has developed several modules, however, other (member-led) programmes may also count.	Training reports, FWF's data on factories enrolled in training programmes. For alternative training activities: curriculum, training content, participation and outcomes.	0	6	0

**Comment:** None of the suppliers of ROOTS for Safety have participated in training programmes that support transformative processes.

**Recommendation:** Fair Wear recommends ROOTS for Safety B.V. 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 and structural change to improve working conditions. To this end, ROOTS for Safety B.V. can make use of Fair Wear's WEP Communication or Violence and Harassment Prevention modules or implement advanced training through external training providers or brand staff. Non-Fair Wear training must follow the standards outlined in Fair Wear's guidance and checklist available on the Member Hub.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.5 Degree to which member company follows up after a training programme.	No training programmes have been conducted or member produces solely in low-risk countries	After factory-level training programmes, complementary activities such as remediation and changes on brand level will achieve a lasting impact.	Documentation of discussions with factory management and worker representatives, minutes of regular worker-management dialogue meetings or anti-harassment committees.	N/A	2	0

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## **Training and Capacity Building**

**Possible Points: 9**

**Earned Points: 3**

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## 5. Information Management

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

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

ROOTS for Safety has an agreement with its suppliers that subcontracting is not permitted unless otherwise discussed. The technical nature of the product means that ROOTS for Safety has strict follow up policies to make sure the product does not leave the factory, and assure the quality is consistent. ROOTS for Safety assumes that any change in quality in the product is one indicator of potential subcontracting, which has not yet happened.

The production manager in China does regular unannounced visits and uses the FWF audits to detect any subcontractors, which are then added to the supplier register.

For one supplier in Italy, the subcontractor's data is not known. Despite several attempts of ROOTS for Safety, this supplier refuses to share the address of its subcontractor in Romania.

**Recommendation:** Fair Wear recommends ROOTS for Safety B.V. to take additional efforts to ensure that the brand is always informed beforehand about the placement of production at production locations. Furthermore, ROOTS for Safety B.V. could also agree with its main suppliers that only a pre-selected number of production locations can be used for production.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
5.2 CSR and other relevant staff actively share information with each other about working conditions at production locations.	Yes	CSR, purchasing and other staff who interact with suppliers need to be able to share information in order to establish a coherent and effective strategy for improvements.	Internal information system; status CAPs, reports of meetings of purchasing/CSR; systematic way of storing information.	1	1	-1

**Comment:** The CSR Manager shares Fair Wear updates with relevant staff at ROOTS for Safety, including Marketing, Purchasing and Sales teams. During their regular discussions, Fair Wear requirements are discussed with the Production manager based in China.

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## Information Management

**Possible Points: 7**

**Earned Points: 4**

## 6. Transparency

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

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.2 Member company engages in advanced reporting activities.	Published Brand Performance Checks, audit reports, and/or other efforts lead to increased transparency.	Good reporting by members helps to ensure the transparency of FWF's work and shares best practices with the industry.	Member company publishes one or more of the following on their website: Brand Performance Check, Audit Reports, Supplier List.	1	2	0

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.3 Social Report is submitted to FWF and is published on member company's website.	Complete and accurate report submitted to FWF 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

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## Transparency

**Possible Points: 6**

**Earned Points: 5**

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## 7. Evaluation

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
7.1 Systemic annual evaluation of FWF membership is conducted with involvement of top management.	Yes	An annual evaluation involving top management ensures that FWF policies are integrated into the structure of the company.	Meeting minutes, verbal reporting, Powerpoints, etc.	2	2	0

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

BPC report is shared with MT and discussed follow up.

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.	10%	In each Brand Performance Check report, FWF may include requirements for changes to management practices. Progress on achieving these requirements is an important part of FWF membership and its process approach.	Member company should show documentation related to the specific requirements made in the previous Brand Performance Check.	2	4	-2

**Comment:** ROOTS for Safety received four requirements last year. These were all related to living wage and determining a target wage. Due to the phase out of ROOTS for Safety's main supplier, insufficient efforts were made in this regard. Minor steps were taken in gaining insight into cost breakdown of prices.

**Requirement:** It is required to work towards remediation of previous requirements from the last Brand Performance Check. Further engagement needs to be taken with regard to the following requirements mentioned in the last Brand Performance Check.

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## Evaluation

**Possible Points: 6**

**Earned Points: 4**

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## Recommendations to Fair Wear

- The appointed Brand Liaison switch is too often, ROOTS recommends Fair Wear to make sure that a member brand has the same Fair Wear contact person for a longer time.

## Scoring Overview

Category	Earned	Possible
Purchasing Practices	21	52
Monitoring and Remediation	12	27
Complaints Handling	9	9
Training and Capacity Building	3	9
Information Management	4	7
Transparency	5	6
Evaluation	4	6
Totals:	58	116

### Benchmarking Score (earned points divided by possible points)

50

### Performance Benchmarking Category

Good

## Brand Performance Check details

Date of Brand Performance Check:

27-05-2020

Conducted by:

Hendrine Stelwagen

Interviews with:

Marco Kremers - QHSE & CSR Manager, Account Manager