



## **Brand Performance Check**

### **Ballyclare 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

## Ballyclare B.V.

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

Member company information	
Headquarters:	Doetinchem , Netherlands
Member since:	2013-07-18
Product types:	Workwear
Production in countries where Fair Wear is active:	Bangladesh, China, Tunisia
Production in other countries:	Hungary, Portugal
Basic requirements	
Workplan and projected production location data for upcoming year have been submitted?	Yes
Actual production location data for evaluation period was submitted?	Yes
Membership fee has been paid?	Yes
Scoring overview	
% of own production under monitoring	94%
Benchmarking score	60
Category	Needs Improvement

## **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 starting their financial year in 2019 in order to maintain fair and comparable data.*

*Fair Wear will evaluate the members' response to the Corona-crisis in the performance check about the financial year starting in 2020. For members having financial years starting in April or later, parts of their response can already be reflected in the current performance check report, although their overall response will be evaluated in the next performance check.*

## Summary:

Ballyclare has met most of Fair Wear's performance requirements in 2019. With a monitoring percentage of 94% Ballyclare meets the required monitoring threshold for members after three years of membership. With a benchmark score of 60, Ballyclare would have secured the 'Good' category. However, due a repeated non-compliance of Fair Wear's 'Enhanced Monitoring Programme' for Bangladesh, for which an insufficient score was already given last year, the brand has been placed in the 'Needs Improvement' category. Fair Wear expects Ballyclare to adhere to the Enhanced Monitoring Programme for Bangladesh and to sufficiently follow up on health and safety findings.

Ballyclare is further expected to start setting target wages with the goal of incrementally moving towards paying living wages at its production facilities. The evaluation of suppliers is still not done in a systematic manner at Ballyclare and it is expected to develop a system for this within the coming year.

Fair Wear would like to compliment Ballyclare for having a good production planning system and for visiting its suppliers during production.

## 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.	90%	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:** Ballyclare has one main supplier in Tunisia from which it sources most of its production. It uses three Tunisian satellite locations of which one was added in 2019 to support this main production facility and spread the risk.

It has another supplier in Hungary and one in Portugal. Leverage at its Tunisian and Hungarian partners is between 5%-70%. Furthermore, Ballyclare sources from factories in China and Bangladesh where leverage is lower (between 2% and 4%).

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.	0%	Fair Wear 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 Fair Wear.	4	4	0

**Comment:** In 2019 there are no suppliers where Ballyclare buys less than 2% of their FOB. There are a few factories where the leverage is limited due to limited purchase volume, but at none of the production facilities does this fall under the 2% limit, hence the scoring of the full 4 points in this indicator.

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.	93%	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:** 93 % of Ballyclares production volume is sourced from locations where the business relationship has existed more than 5 years. It is an increase of 6 percentage points over previous year and it underlines the focus the company has on developing long-term relationships with its suppliers. Ballyclare has long-term relationships with most of its suppliers in Tunisia, Portugal and Hungary.

In recent years, Ballyclare started to do some of its production in China and Bangladesh but it still has not moved a significant portion of its production volume to these countries. The majority of its production volume is kept with existing suppliers while exploring options and increasing flexibility to match the product range of its customers.

The company's primary focus remain on its production in Tunisia where it added another supplier in 2019.

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:** Ballyclare started up with one new production location in Tunisia in 2019. Ballyclare was able to show the returned questionnaire for the new production location during the Brand Performance Check.

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

**Comment:** In 2019 Ballyclare started a relationship with a new supplier in Tunisia. The supplier was recommended to Ballyclare by another Fair Wear member who was already sourcing from this facility and knew of their excess capacity.

Selecting a supplier within the Fair Wear family makes a lot of sense and shortens the process of conducting human rights due diligence, since the production location is already known. It also gives members the opportunity to share audit and training costs.



Due diligence is conducted by visiting suppliers and discussing the labour standards. Ballyclare is aware of high risks in countries like Tunisia, China and Bangladesh. Risk assessment for new production locations is however still not done in a systematic manner.

**Recommendation:** It is advised to describe the process of assessing working conditions at potential new suppliers in a sourcing strategy that is agreed upon with top management/sourcing staff.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.5 Production location compliance with Code of Labour Practices is evaluated in a systematic manner.	No	A systemic approach is required to integrate social compliance into normal business processes, and supports good decisionmaking.	Documentation of systemic approach: rating systems, checklists, databases, etc.	0	2	0

**Comment:** Ballyclare sources its products from a small range of suppliers.

About 4% of production takes place in China and Bangladesh. In China and Bangladesh Ballyclare does not systematically evaluate their suppliers compliance with the Code of Labour Practices.

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

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

**Requirement:** A systematic approach is required to integrate social compliance into normal business processes, and supports good decision-making. The approach needs to ensure that Ballyclare B.V. consistently evaluates the entire supplier base and includes information into decision-making procedures.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.6 The member company's production planning systems support reasonable working hours.	Strong, integrated systems in place.	Member company production planning systems can have a significant impact on the levels of excessive overtime at production locations.	Documentation of robust planning systems.	4	4	0

**Comment:** For Tunisia Ballyclare knows the standard working minutes for each product. This, in combination with knowing the production capacity, allows Ballyclare to plan production in a way that avoids excessive overtime, planning for a 48 hour week with quarterly forecasts which are shared with the factory.

If there is insufficient production capacity, orders are shifted forward into the coming weeks where Ballyclare uses a colour coded graph that easily shows which weeks already booked and/or free capacity. At its main supplier, orders are outsourced to one of the satellite production facilities. Its main Tunisian supplier closely plans production with these satellite production locations.

Workers often worked reduced hours due to insufficient orders. Despite the fact that Ballyclare knows these production locations and most have been audited by Fair Wear, it is not involved in the decision-making process about placing orders at subcontractors when production capacity is needed.

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

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

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 an audit concluded in November 2019 at on of Ballyclares Tunisian suppliers there was a finding of inconsistent time records. During the course of 2019 this production location was visited twice and each time the subject was discussed.

The supplier has a third party doing the wage records and Ballyclare asked for proof of wages and salary slips to be handed over which happened. The new audit finding will need to be remediated during the beginning of 2020 and till therefore be evaluated in the next Brand Performance Check. Due to the inconsistent

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.8 Member company can demonstrate the link between its buying prices and wage levels in production locations.	Intermediate	Understanding the labour component of buying prices is an essential first step for member companies towards ensuring the payment of minimum wages – and towards the implementation of living wages.	Interviews with production staff, documents related to member's pricing policy and system, buying contracts.	2	4	0

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

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

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

**Recommendation:** At a minimum, members are recommended to investigate wage levels in production countries, among others by making use of 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. This recommendation applies specifically to production locations in China and Bangladesh.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.9 Member company actively responds if production locations fail to pay legal minimum wages and/or fail to provide wage data to verify minimum wage is paid.	Yes	If a supplier fails to pay minimum wage or minimum wage payments cannot be verified, Fair Wear 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, Fair Wear Audit Reports or additional monitoring visits by a Fair Wear auditor, or other documents that show minimum wage issue is reported/resolved.	0	0	-2

**Comment:** An audit conducted in November 2019 showed issues regarding inconsistent wage-records, insufficient payout of bonuses as well as missing social security at one of Ballyclares suppliers in Tunisia. Ballyclare responded actively to these findings and discussed them with the supplier. The remediation process needs to be followed up in next years Brand Performance Check to evidence of the situation being resolved as results could not be produced in 2019 given the short time frame.

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

**Comment:** In 2019 there is no evidence of late payment to suppliers by Ballyclare.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.11 Degree to which member company assesses and responds to root causes for wages that are lower than living wages in production locations.	Intermediate	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach	Evidence of how payment below living wage was addressed, such as: Internal policy and strategy documents, reports, correspondence with factories, etc	4	6	0

**Comment:** At its main Tunisian supplier, Ballyclare is aware of the wage levels. It is also aware of the Fair Wear wage ladder and which steps it needs to take to come to a living wage. Because Ballyclare is in the same holding with another brand also sourcing at its main Tunisian supplier, it has access to costing data. At its other Tunisian suppliers, Ballyclare knows from Fair Wear audits what the wage levels are at these factories and can compare them to living wages. It has discussed living wages with its Tunisian suppliers and is investigating the breakdown of living wages for one or two-person household costs. Their QC staff in Tunisia has calculated wage differences to reach living wage and discussions are taking place with worker delegations.

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

**Requirement:** Ballyclare B.V. must assess the root causes of wages that are lower than living wages, taking into account its leverage and effect of its own pricing policy. Ballyclare B.V. is expected to take an active role in discussing living wages with its suppliers. The Fair Wear wage ladder can be used as a tool to implement living wages, to document, monitor, negotiate and evaluate the improvements at its suppliers.

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).	70%	Owning a supplier increases the accountability and reduces the risk of unexpected CoLP violations. Given these advantages, this is a bonus indicator. Extra points are possible, but the indicator will not negatively affect an member company's score.	Supplier information provided by member company.	2	2	0

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

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

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

**Comment:** Ballyclare still has to determine a target wage and discuss with suppliers how to finance wage increases.

**Requirement:** Ballyclare should analyze what is needed to increase wages and develop a strategy to finance the costs of wage increases.

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.14 Percentage of production volume where the member company pays its share of the target wage.	0%	Fair Wear 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:** Ballyclare has not yet defined a target wage and is therefore not paying its share of the target wage at any of its suppliers

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

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## Purchasing Practices

**Possible Points: 52**

**Earned Points: 31**

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## 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.	4%	
% of production volume where Fair Wear audits took place.	86%	
% of production volume where an audit took place.	89%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.	6%	To be counted towards the monitoring threshold, FWF low-risk policy should be implemented. See indicator 2.9. (N/A = no production in low risk countries.)
Member meets monitoring requirements for tail-end production locations.	N/A	
Requirement(s) for next performance check		
Total monitoring threshold:	94%	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 Fair Wear membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	2	2	-2

**Comment:** The Head of Finance is responsible for all Tunisian operations and the Director of Sourcing is responsible for the monitoring processes in all other production locations.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.2 Quality of own auditing system meets FWF standards.	Member makes use of FWF audits and/or external audits only	In case Fair Wear teams cannot be used, the member companies' own auditing system must ensure sufficient quality in order for Fair Wear 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: Fair Wear 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:** Ballyclare is sharing CAPs with their factories and improvement timelines are established in a timely manner.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.4 Degree of progress towards resolution of existing Corrective Action Plans and remediation of identified problems.	Basic	Fair Wear considers efforts to resolve CAPs to be one of the most important things that member companies can do towards improving working conditions.	CAP-related documentation including status of findings, documentation of remediation and follow up actions taken by member. Reports of quality assessments. Evidence of understanding relevant issues.	4	8	-2

**Comment:** Ballyclare has one open CAP report at its biggest supplier but so far degree of process towards resolution of the identified problems has been limited due to the limited time it has had to work on the issues. Progress needs to be followed up in next years brand performance check and CAP resolution should be a strong priority.

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

**Recommendation:** Fair Wear strongly recommends to ensure that the size of the supply chain and the available resources of Ballyclare B.V. to actively follow up on CAP issues are coinciding. Possible solutions could be to decrease the number of suppliers or increase the amount of resources needed for active follow up.

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.	88%	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:** In 2019 Ballyclare visited its main suppliers in Tunisia as well as its suppliers in Hungary and Portugal, amounting to 88% of their total production volume.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.6 Existing audit reports from other sources are collected.	Yes and quality assessed	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.	2	3	0

**Comment:** Audit reports are collected from SEDEX from China and Bangladesh reports are being quality assessed using Fair Wears Audit Quality Assessment Tool.

**Recommendation:** Fair Wear recommends Ballyclare B.V. to assess the quality of the external audit report and immediately discuss with the supplier what information is missing and how to collect that information.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.7 Compliance with FWF risk policies.	Average score depending on the number of applicable policies and results	Aside from regular monitoring and remediation requirements under Fair Wear membership, countries, specific areas within countries or specific product groups may pose specific risks that require additional steps to address and remediate those risks. Fair Wear requires member companies to be aware of those risks and implement policy requirements as prescribed by Fair Wear.	Policy documents, inspection reports, evidence of cooperation with other customers sourcing at the same factories, reports of meetings with suppliers, reports of additional activities and/or attendance lists as mentioned in policy documents.	1	6	-2
Compliance with FWF enhanced monitoring programme Bangladesh	Insufficient			-2	6	-2
Compliance with FWF Myanmar policy	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on abrasive blasting	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on risks related to Turkish garment factories employing Syrian refugees	Policies are not relevant to the company's supply chain			N/A	6	-2
Other risks specific to the member's supply chain are addressed by its monitoring system	Intermediate			3	6	-2

**Comment:** Bangladesh: Ballyclare has a very low production volume (< 1%) in this country and is producing only at one supplier. In 2018 a BSCI audit showed non-compliance in the area of health and safety but Ballyclare did not take steps to mitigate these risks which led to a score if insufficient in last years BPC. This year Ballyclare commissioned a SEDEX SMETA audit. While this audit did not uncover any findings regarding health risks, it did point out a missing fire license as well as the absense of fire-drill performed by the local authorities. Ballyclare did not follow up on these findings.

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

Last year a requirement was included by Fair Wear to have the production location(s) participate in a fire and building safety awareness workshop for top management which is a basic requirement in the Enhanced Monitoring Programme, but this requirement was not followed. The supplier Ballyclare is working with also is not covered by the Bangladesh ACCORD on fire and building safety nor the Alliance. These facts lead to a repeat non-compliance score in this indicator in relation to Bangladesh.

**Requirement:** Ballyclare B.V.'s monitoring system should identify and address high risk issues that are specific to the member's sourcing practices. Fair Wear provides policies and country-specific requirements to member companies. Priorities in remediation efforts are guided by these policies.

Ballyclare needs to adhere to Fair Wears Enhanced Monitoring Programme for Bangladesh and to do explicit follow up on audit findings as well do a systematic evaluation of their suppliers compliance with the Fair Wear Code of Labor Practices.

**Recommendation:** Ballyclare should asses whether its feasible to conduct proper human rights due diligence in Bangladesh. It should be assessed if there can be balance against the production volume placed and the resources needed to conduct the proper human rights due diligence and adhere to Fair Wears' Enhanced Monitoring Programme.

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

**Comment:** In 2019 there were no active CAPs in shared production locations.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.9 Percentage of production volume where monitoring requirements for low-risk countries are fulfilled.	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. Fair Wear has defined minimum monitoring requirements for production locations in low-risk countries.	Documentation of visits, notification of suppliers of Fair Wear membership; posting of worker information sheets, completed questionnaires.	2	2	0

**Member undertakes additional activities to monitor suppliers.:** No (o)

**Comment:** Ballyclare fulfilled all monitoring requirements for low-risk countries in 2019.

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	Fair Wear 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 Fair Wear 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.	Yes, and member has collected necessary information	Fair Wear believes it is important for affiliates that have a retail/wholesale arm to at least know if the brands they resell are members of Fair Wear or a similar organisation, and in which countries those brands produce goods.	Questionnaires are on file.	2	2	0

**Comment:** During the brand performance check Ballyclare was able to show the questionnaires collected from its external brands.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.12 External brands resold by member companies that are members of another credible initiative (% of external sales volume).	0%	Fair Wear 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 Fair Wear's information management system. Documentation of sales volumes of products made by Fair Wear or FLA members.	0	3	0

**Comment:** None of the external brands resold by Ballyclare are member of a credible initiative.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.13 Questionnaire is sent and information is collected from licensees.	No licensees	Fair Wear 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: 33**

**Earned Points: 19**

### 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 Fair Wear 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:** In 2019 the Head of Finance was responsible for handling worker complaints.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.2 Member company has informed factory management and workers about the FWF CoLP and complaints hotline.	Yes	Informing both management and workers about the Fair Wear Code of Labour Practices and complaints hotline is a first step in alerting workers to their rights. The Worker Information Sheet is a tool to do this and should be visibly posted at all production locations.	Photos by company staff, audit reports, checklists from production location visits, etc.	2	2	-2

**Comment:** During the Brand Performance Check, Ballyclare was able to show that the Fair Wear Code of Labour Practices was posted in all production locations.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.3 Degree to which member company has actively raised awareness of the FWF CoLP and complaints hotline.	74%	After informing workers and management of the Fair Wear CoLP and the complaints hotline, additional awareness raising and training is needed to ensure sustainable improvements and structural worker-management dialogue.	Training reports, Fair Wear's data on factories enrolled in the WEP basic module. For alternative training activities: curriculum, training content, participation and outcomes.	4	6	0

**Comment:** A WEP training at Ballyclares largest supplier which took place in late 2016 covers the need for awareness raising of Fair Wears Code of Labour Practices. Training efforts will need to be renewed during 2020 to cover the next term of three year validity.

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 Fair Wear 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: 7**

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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 Fair Wear membership requirements helps to support cross-departmental collaboration when needed.	Emails, trainings, presentation, newsletters, etc.	1	1	0

**Comment:** Once a year, staff is updated on the Brand Performance Check outcomes and all Fair Wears' activities, actions and plans. Sales meetings and other joint team meetings also include Fair Wear updates and production location findings from teams on location.

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

**Comment:** Staff in direct contact with suppliers is informed about Fair Wear requirements.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices.	Member does not use agents/contractors	Agents have the potential to either support or disrupt CoLP implementation. It is the responsibility of member company to ensure agents actively support the implementation of the CoLP.	Correspondence with agents, trainings for agents, Fair Wear 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. Fair Wear has developed several modules, however, other (member-led) programmes may also count.	Training reports, Fair Wear's data on factories enrolled in training programmes. For alternative training activities: curriculum, training content, participation and outcomes.	0	6	0

**Comment:** Ballyclare had not enrolled its suppliers in any training programs that support transformative processes related to human rights.

**Recommendation:** Fair Wear recommends members to implement training programmes that support factory-level transformation such as establishing functional internal grievance mechanisms, improving worker-management dialogue and communication skills or addressing gender-based violence. Training assessed under this indicator should go beyond raising awareness and focus on behavioral change and long-term structures to improve working conditions. To this end, members can make use of Fair Wears' 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.	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:** Ballyclare is generally well aware of all its production locations and makes an effort to discuss this issue when visiting its suppliers to make sure that no unauthorized subcontracting is taking place.

**Recommendation:** Members are advised to develop a systematic approach to complete the production location list. Part of the approach can be:

1. Automatically include information from the questionnaire, audit reports and complaints
2. Business relationships with agents include transparency of production locations.
3. Agreements with factories on the use of subcontractors stating clearly that when subcontractors are used, they are included in the monitoring system and information is shared on the subcontracted production process.

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

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## Information Management

**Possible Points: 7**

**Earned Points: 4**

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## 6. Transparency

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

**Comment:** In 2019 Ballyclare was communicating about their Fair Wear membership to customers and tenders as well as communicating about it on its website. They are still doing this but since 2020 only via the Social Report. The reason being a change of name from "Uniform Brands" to "Ballyclare Limited" and a restructuring of the organization which took place early 2020.

Currently Ballyclare Netherlands is sharing the website of their mother company Ballyclare UK. Ballyclare UK is not member of Fair Wear which in 2020 has not made it possible to communicate specifically about its Fair Wear membership on the website in 2020.

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 Fair Wear'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:** Ballyclare publishes the Brand Performance Check report 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 Fair Wear's communication policy.	Social report that is in line with Fair Wear's communication policy.	2	2	-1

**Comment:** Ballyclare submitted its social report to Fair Wear and published it on its website

## Transparency

**Possible Points: 6**

**Earned Points: 5**



## 7. Evaluation

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

**Comment:** Ballyclare holds annual evaluations of Fair Wear membership with top management. Furthermore, top management discusses the outcomes of the Brand Performance Check to ensure progress is made.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
7.2 Level of action/progress made on required changes from previous Brand Performance Check implemented by member company.	16%	In each Brand Performance Check report, Fair Wear may include requirements for changes to management practices. Progress on achieving these requirements is an important part of Fair Wear membership and its process approach.	Member company should show documentation related to the specific requirements made in the previous Brand Performance Check.	2	4	-2

**Comment:** In the previous Brand Performance Check 6 requirements were given (1.5, 1.11, 1.14, 2.4, 2.7, 2.11).

The brand fulfilled the requirement made in indicator 2.11 by sending the questionnaire to external producers.

For the remaining requirements no significant improvement were shown.

**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

Ballyclare compliments Fair Wear for doing well and growing internationally and are encouraging this continue.

Ballyclare recommends Fair Wear to get the government of the Netherlands involved in driving changes and engaging with governments in production countries.

## Scoring Overview

Category	Earned	Possible
Purchasing Practices	31	52
Monitoring and Remediation	19	33
Complaints Handling	7	9
Training and Capacity Building	3	9
Information Management	4	7
Transparency	5	6
Evaluation	4	6
Totals:	73	122

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

60

### Performance Benchmarking Category

Needs Improvement

## Brand Performance Check details

Date of Brand Performance Check:

20-08-2020

Conducted by:

Peter Jahns

Interviews with:

Katja Woonink, CSR Manager

Ruud Wissink, CEO