



Brand Performance Check

Picture Organic Clothing

Publication date: October 2020

This report covers the evaluation period 01-04-2019 to 31-03-2020

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. The online [Brand Performance Check Guide](#) provides more information about the indicators.

Brand Performance Check Overview

Picture Organic Clothing

Evaluation Period: 01-04-2019 to 31-03-2020

Member company information	
Headquarters:	Gerzat , France
Member since:	
Product types:	Outdoor products; Sports & active wear; Outdoor wear
Production in countries where Fair Wear is active:	China, India, Thailand, Turkey, Vietnam
Production in other countries:	France, Mauritius, Taiwan
Basic requirements	
Workplan and projected production location data for upcoming year have been submitted?	Yes
Membership fee has been paid?	Yes
Scoring overview	
% of own production under monitoring	85%
Benchmarking score	48
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:

Picture has shown insufficient progress in performance indicators. Although the member reaches a monitoring threshold of 85%, it reached a score of 48 which is not sufficient to meet the scoring benchmark of 50 points for 3+ years membership. Therefore the member is placed in the 'Needs Improvement'-category.

Picture sources most of its products from two main suppliers: one located in China and one in Turkey. In recent years the brand added suppliers to its supply chain to expand its product range and to spread delivery risks among suppliers.

The brand improved its systems to ensure the Worker Information Sheet is posted at its suppliers. It also moved production to the low season to prevent contributing to excessive overtime. The member also made good strides in identifying subcontractors and is transparent about its suppliers.

However, the brand showed little progress in following up on requirements related to legal minimum wages, living wages, informing workers on the Fair Wear Code of Labour Practices and worker helpline and more transformative training. Fair Wear requires Picture to follow up on these requirements as soon as possible.

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.	86%	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: Picture has two main suppliers, one in China and one in Turkey. Combined, they are responsible for more than 80% of the production volume of Picture. In total, Picture produces garments at 21 suppliers.

Recommendation: Fair Wear recommends Picture Organic Clothing to consolidate its supplier base where possible, and increase leverage at main production locations to effectively request improvements of working conditions. It is advised to describe the process of consolidation in a sourcing strategy that is agreed upon with top management/sourcing staff.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.1b Percentage of production volume from production locations where member company buys less than 2% of its total FOB.	13%	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.	2	4	0

Comment: 19 Suppliers account for 18% of Pictures' production volume. Among these suppliers are also 3 subcontractors that have been identified by Picture. The brand expanded its supply base to spread the risk of late or non-delivery. Instead of a single factory, the brand spreads the risk by sourcing from two factories that can produce the same item.

The brand is planning to reduce the range of products produced as it is aware that it has limited influence to change working conditions at tail end suppliers.

Recommendation: Fair Wear recommends Picture Organic Clothing to consolidate its supply base by limiting the number of production locations in its 'tail end'. Shortening the tail will reduce the social compliance risks the member is exposed to and will allow the member to improve working conditions in a more efficient and effective way. When the tail end cannot be reduced further because of the production of certain garments, Fair Wear recommends Picture to increase its leverage by sourcing from factories where other Fair Wear members are active and/or increase human rights due diligence at new suppliers to ensure that factories with few issues are selected.

It is advised to describe the process of consolidation in a sourcing strategy that is agreed upon with top management/sourcing staff.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.2 Percentage of production volume from production locations where a business relationship has existed for at least five years.	86%	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: The brand has been working with its two main suppliers and their subcontractors for more than five years. Relations with the tail-end suppliers have been started up in the last five years.

Recommendation: Fair Wear recommends Picture Organic Clothing to maintain stable business relationships with its tail-end suppliers. Long term relationships support most aspects of the Code of Labour Practices, and give factories a reason to invest in improving working conditions. Building trust can enhance the influence over a supplier compared to its actual leverage.

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: Picture started new relationships with 2 new suppliers. The suppliers signed and returned the Fair Wear Code of Labour Practices before the 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: The brand takes several factors into account when deciding on selecting new suppliers. The member has developed a social checklist that is used by Picture's staff to check whether external audit reports are available and which other brands are sourcing from the factory. Picture favors factories where other Fair Wear members or sustainable garment brands source from.

At its new Chinese supplier, the brand learned that other outdoor brands and sustainable brands were sourcing from this factory. Unfortunately, the main customer was not willing to share its own audit report with Picture. The brand knows about the human rights risks when sourcing from China. Therefore, the brand agreed with the supplier that production for Picture takes place in low season to avoid excessive overtime.

The brand collected a WRAP-audit report from Mauritian supplier. However, the brand is not aware of the human rights risks in Mauritius and was therefore not able to link those risks to the supplier.

The brand did not visit the new suppliers and did not complete the OHS-checklist.

Recommendation: To improve its human rights due diligence for new suppliers, Fair Wear recommends Picture to strengthen its systems in assessing country-specific risks, visits and collecting supplier information. To build trust and to get a sense of the situation on the ground, Fair Wear recommends Picture to visit new suppliers and complete the OHS-checklist before orders are placed. Although the brand requests external audit reports before the start of the relationship, Fair Wear recommends Picture to take additional monitoring measures in case such reports are not available. Requesting additional information related to country-specific risks, planning a monitoring visit or an audit by an independent third party are examples of such measures. Furthermore, before deciding on entering a country, Fair Wear recommends Picture to learn more about country specific risks. When the decision to enter a country is made, the brand should then link these risks to the specific situation of suppliers. The brand could expand its social checklist by including more country-specific information.

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 brand keeps track of the suppliers' performance on improving working conditions. These factories are ranked based on priority issues. Issues such as complaints, or non-payment of legal minimum wage move the suppliers up the ladder. Purchasing staff is informed about the status of suppliers. However, the document to assess suppliers is not yet made available to purchasing staff.

Currently, the assessment and evaluation of suppliers does not yet lead to specific production decisions.

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

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

Comment: Picture has two seasons a year Spring-Summer (SS) and Fall-Winter (FW). It takes 1.5 years from the development of a new collection until the delivery of products.

The production of the SS items takes about 4.5 months, whereas the FW products demand 6 months because of their complexity.

With its two main suppliers, the brand discusses delivery dates and plans back to when the final order needs to be confirmed. The brand has agreements in place with the suppliers that the production takes place in low season. It has a stock in France where the products are sent. The brand splits the orders in three for a specific season to ensure that the supplier can already start production early. The placement of the three orders take place within two months in total. Internally, the brand agreed that the final order placement cannot be higher than the forecast that was given before.

The brand does not know the production capacity per month and has not linked their order placement to the total size of production capacity.

At its tail end suppliers, the brand discusses with the agent what low seasons are for the suppliers and what the best moment would be to place orders.

Recommendation: Fair Wear recommends Picture Organic Clothing 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: A 2019 Fair Wear audit at its main Chinese supplier found that the supplier had falsified wage and time records. The brand responded by moving its production to the low season. Furthermore, the brand entered into a discussion with the supplier on the records to convince the supplier to share the actual records with local Fair Wear staff.

Recommendation: Fair Wear recommends Picture to continue discussions with the supplier on the Fair Wear system and emphasizing building trust and openness. The brand could plan a monitoring visit by local Fair Wear staff once the supplier agreed to share its true records.

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: Picture negotiates prices through a top-down model. It calculates the price per product and then calculates back to what the maximum price of the supplier can be. In case the supplier cannot meet the price, the brand discusses with the supplier how it can substitute zippers, pockets, etc. At its main Turkish supplier, the brand gained more insight into the paid wages.

The brand keeps an overview of the legal minimum wages and living wages per country. Although the brand knows the price of the fabric, it does not know the labour cost per product. Neither does it estimate how the prices of the suppliers are build up and whether their prices support a legal minimum wage.

Requirement: Picture Organic Clothing 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: Fair Wear recommends Picture to at least calculate an estimation of the relationship between wages and their prices. The brand could use the knowledge it has acquired on the wage levels at the Turkish supplier to estimate the number of minutes that are needed to produce a garment and set it off against the wage component in their prices based on data provided to Picture.

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	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.	-2	0	-2

Comment: A Fair Wear audit conducted in March 2019 found that their main Chinese supplier had falsified wage records. The brand discussed the issue with the supplier and tried to convince them to be more transparent.

The factory claimed to pay legal minimum wages. However, the brand has not yet received any proof of legal minimum wages being paid. Neither did the brand plan a monitoring visit or audit after it had convinced the supplier to be more transparent.

Requirement: If a supplier is not transparent about wages, Picture Organic Clothing is expected to respond as if minimum wages have not been paid. Picture Organic Clothing is required to collect evidence of payment of legal minimum wage as soon as possible after receipt of the audit report. Factory visits with a documents check or additional verification by Fair Wear may be needed to verify remediation.

Recommendation: Fair Wear strongly recommends Picture Organic Clothing to always verify whether legal minimum wage issues have actually been resolved in case factory management claims so. Picture Organic Clothing could hire a local consultant or plan a monitoring visit of one of Fair Wear's auditors to check whether the issue has actually been resolved.

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: Audit reports of Fair Wear do not report any late payment by Picture.

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: Picture discussed living wages with its main supplier in China after the audit. The supplier felt that the living wage benchmark provided in the audit report was unrealistic and the gap between the current wages and living wages was too big. Furthermore, the brand collected more information on living wage benchmarks through the Fair Wear wage ladders on our website.

The brand did not take further steps with their Chinese supplier. Neither did it discuss living wages or assess the root causes for wages lower than living wages with other suppliers.

Requirement: Picture Organic Clothing 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. Picture Organic Clothing 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).	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

Comment: Picture does not own any production location.

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: The member has not set any target wage with its factories yet.

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.14 Percentage of production volume where the member company pays its share of the target wage.	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: As the member has not yet set a target wage, Picture could not show payment of its share of the target wage.

Recommendation: Fair Wear recommends Picture to develop a strategy to work towards living wages by increasing wages and setting target wages. The brand should calculate its share in paying target wages. Furthermore, the brand could draw from the experience of other Fair Wear members that have increased wages while their leverage is limited.

Purchasing Practices

Possible Points: 52

Earned Points: 20

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.	17%	
% of production volume where Fair Wear audits took place.	67%	
% of production volume where an audit took place.	84%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.	1%	To be counted towards the monitoring threshold, FWF low-risk policy should be implemented. See indicator 2.g. (N/A = no production in low risk countries.)
Member meets monitoring requirements for tail-end production locations.	No (implementation will be assessed next performance check)	FWF members must meet tail-end monitoring requirements. Implementation will be assessed during next Brand Performance check.
Requirement(s) for next performance check	All factories must be visited by Picture Organic Clothing staff at least once every 3 years. During factory visits, labour conditions and the use of subcontractors must be discussed, outcomes of the discussion must be documented, and the Fair Wear health and safety check-list must be completed and filed for Fair Wear to assess during a Brand Performance Check. Picture Organic Clothing can collect existing audit reports from the production sites in order to ensure most up to date information on working conditions.	
Total monitoring threshold:	85%	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 sustainability manager is responsible for following up on issues identified by the monitoring system.

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

Comment: In the financial year 2019/2020, no Fair Wear audits were conducted. Therefore, this indicator is rated N/A.

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: Picture followed up on the 2019 audit report at its main Chinese supplier. After having received the report, the brand visited the supplier to discuss the outcomes, especially concerning transparency in records on wages and working hours. Based on the outcomes the brand moved its production to the low season. Furthermore, the brand ensured the worker information sheet was posted correctly.

The brand collected audit reports of two suppliers in the tail end. The brand also collected an external audit report from its main Turkish supplier. The report showed that there were no violations, although the report did not contain specific information on living wages and Syrian refugees.

Recommendation: Fair Wear recommends Picture to verify remediation through monitoring visits or audits in a timely manner. Furthermore, Fair Wear recommends to conduct a Fair Wear audit at its Turkish supplier to gather more information on all 8 labour standards. We also encourage the brand to actively collect audit reports from its tail end suppliers.

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.	69%	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.	3	4	0

Comment: The brand visited its main Chinese supplier and two other suppliers where labour conditions were also discussed.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.6 Existing audit reports from other sources are collected.	Yes, quality assessed and corrective actions implemented	Existing reports form a basis for understanding the issues and strengths of a supplier, and reduces duplicative work.	Audit reports are on file; evidence of followup on prior CAPs. Reports of quality assessments.	3	3	0

Comment: The brand actively collects, assesses and follows up on audit reports. It collected external reports of 3 suppliers. At one supplier, no violations were found although not all country specific-risks were covered.

Recommendation: Fair Wear recommends the brand to collect additional information on country specific risks, such as living wage benchmarks and Syrian refugees in case this is not provided by audit reports.

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	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	Intermediate			3	6	-2
Other risks specific to the member's supply chain are addressed by its monitoring system	Insufficient			-2	6	-2

Comment: Picture does not yet have a systematic approach to assessing and responding to country-specific risks. In general, the sustainability manager is aware of risks in China. For example, the brand knows about the risks of excessive overtime and moved production to the low season. However, the brand does not yet have a system in place to assess and to keep staff of Picture up to date. Furthermore, the brand entered Mauritius without having analysed the country specific risks first.

Picture created and shared their policy on Syrian refugees employment with the Turkish supplier. Then the supplier shared theirs, stating that they don't want to hire Syrian refugees. Seyfeli also shared the policy of Picture with its two subcontractors. The audit report of its main Turkish supplier did not contain detailed information on the hiring of Syrian refugees. The two subcontractors for printing and embroidery were not audited. The brand did not provide training on hiring Syrian refugees to its suppliers.

Requirement: Picture Organic Clothing'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.

Recommendation: Knowing the country specific risks facilitates the starting point for discussing this with suppliers. Member companies can agree on additional commitments that are required to mitigate risks. Picture Organic Clothing can provide additional measures for support and integrate that in the monitoring system.

For its Turkish supplier and subcontractors, it should conduct additional monitoring efforts and provide training if needed.

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: The brand does not share production locations with active CAPs with other Fair Wear members.

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: Picture sources from 2 suppliers from low-risk countries. The brand fulfilled the monitoring requirements for low-risk countries for these 2 suppliers.

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

Comment: The member did conduct Fair Wear or full audits at its tail-end production locations.

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	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.	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	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.	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	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: 26

Earned Points: 15

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: The sustainability manager follows up on any complaint raised through the Fair Wear complaints handling system.

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: Picture has a system in place to check whether the worker information sheet is posted. Either through a factory visit or by asking a picture of a posted FWF CoLP the brand is informed. However, the pictures of the worker information sheets do not always show whether they are posted in areas that are safe and accessible for workers.

Recommendation: Fair Wear recommends Picture to check where worker information sheets are posted to ensure accessibility and safety for workers.

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.	0%	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.	0	6	0

Comment: The brand did not take additional efforts to raise awareness among worker of the FWF CoLP and complaints hotline. The brand did not plan a WEP-basic training at any of its suppliers.

Requirement: Fair Wear requires members to actively raise awareness about the Fair Wear Code of Labour Practices and Fair Wear complaint hotline. Picture Organic Clothing should ensure good quality systematic training of workers and management on these topics. To this end members can either use Fair Wear's Workplace Education Programme (WEP) basic module, or implement training related to the Fair Wear CoLP and complaint hotline through service providers or brand staff. Fair Wear's guidance on training quality standards is available on the Member Hub.

Recommendation: Fair Wear recommends Picture to at least train its two main suppliers on the FWF CoLP and complaints hotline.

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

Comment: No complaints were filed at suppliers from Picture.

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

Complaints Handling

Possible Points: 9

Earned Points: 3

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: The sustainability manager of Picture actively raises awareness about Fair Wear membership among staff of Picture. A training on the social and environmental commitment of the brand is provided twice a year, or when new staff is hired.

Furthermore, the brand actively contributes to the 'I made your clothes' campaign of Fashion Revolution, which also increases internal commitment to improving working conditions. A booklet on sustainability is dispersed to all employees.

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 that are in direct contact with suppliers have access to a dropbox where materials of Fair Wear requirements can be found.

Recommendation: Fair Wear recommends Picture to actively involve purchasing staff and agents in CSR efforts to also build their commitment towards improving working conditions and to include specific tasks, for example increasing price-wage transparency, more into their daily operations.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices.	Yes	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.	1	2	0

Comment: Picture works with two agents. One of them is an agency they work with since the business was launched and has an office in the same building as Picture; in Annecy. This agent is in charge of relationships with the Chinese and Lithuanian suppliers.

Another agent is the main contact point with smaller suppliers (tail end). This agent is currently connecting Picture’s CSR manager and CSR contact points of those suppliers.

Both agents are trained and regularly meet Picture’s CSR manager. The agents are not yet actively involved in following up CAPs of audit reports.

Recommendation: Fair Wear recommends the member to actively train their sourcing contractors/agents on monitoring and remediating gender-related problems and enable them to support the implementation of the CoLP.

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: The brand did not enroll any supplier in a training programme that supports transformative processes.

Recommendation: Fair Wear recommends Picture Organic Clothing 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, Picture Organic Clothing 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

Training and Capacity Building

Possible Points: 11

Earned Points: 4

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: The brand knows its main production locations and has produced good efforts in identifying subcontractors. Besides identifying CMT-subcontractors for its Turkish supplier, the member also identified printing and embroidery subcontractors at some of its production locations. Often, these subcontractors are part of the tail end production locations.

Recommendation: Fair Wear recommends Picture Organic Clothing to integrate systematic periodical checks with its agents whether all known production locations are still up to date and use the information coming from questionnaires to update supplier data, including subcontractors.

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 sustainability manager collaborates with purchasing staff and the agents and shares information with them. However, the brand could improve its systems to more actively inform and involve these staff members.

Recommendation: It is advised to make relevant staff aware of the available tools Fair Wear offers, such as the Health and Safety guides, monitoring CAP documents, access to Fair Wear's online information system. Purchasing staff are recommended to share reports from factory visits that include a status update of implementing the CoLP. For future CAP follow-up, FWF advises Picture to establish a clear communication system between factories, agents, sourcing director and the CSR manager.

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	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: The brand communicates about Fair Wear Foundation and improving working conditions at its suppliers. The communication is in line with the communications policy of Fair Wear.

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

Comment: The brand publishes the brand performance check report and its supplier list online.

Recommendation: Fair Wear recommends Picture to provide more transparency on the issues at its suppliers and which measures Picture is taking to address and remediate these issues.

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: The brand has sent its social report to Fair Wear and also published it on its website.

Transparency

Possible Points: 6

Earned Points: 6

7. Evaluation

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

Comment: The brand evaluates Fair Wear membership and requirements at least once a year. After finalizing the brand performance check report, the sustainability manager and the CEO discuss improvements.

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.	29%	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

Evaluation

Possible Points: 6

Earned Points: 4

Recommendations to Fair Wear

Picture recommends Fair Wear to ensure that the brand liaison is regularly in touch with them. Also, to provide more guidance and a clear road map on how to progress.

Furthermore, the brand recommends Fair Wear to provide more information and guidance on FWF services to factories, e.g. on conducting audits.

Scoring Overview

Category	Earned	Possible
Purchasing Practices	20	52
Monitoring and Remediation	15	26
Complaints Handling	3	9
Training and Capacity Building	4	11
Information Management	4	7
Transparency	6	6
Evaluation	4	6
Totals:	56	117

Benchmarking Score (earned points divided by possible points)

48

Performance Benchmarking Category

Needs Improvement

Brand Performance Check details

Date of Brand Performance Check:

01-09-2020

Conducted by:

Wilco van Bokhorst

Interviews with:

Florian Palluel - Sustainability manager