



## **Brand Performance Check**

### **Waschbaer GmbH**

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

## Waschbaer GmbH

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

Member company information	
Headquarters:	Freiburg im Breisgau , Germany
Member since:	2011-08-31
Product types:	Garments, Clothing, Fashion apparel
Production in countries where Fair Wear is active:	China, India, North Macedonia, Romania, Tunisia, Turkey
Production in other countries:	Austria, Bosnia and Herzegovina, Germany, Greece, Lithuania, Poland, Slovakia, Spain, Ukraine
Basic requirements	
Workplan and projected production location data for upcoming year have been submitted?	Yes
Actual production location data for evaluation period was submitted?	Yes
Membership fee has been paid?	Yes
Scoring overview	
% of own production under monitoring	97%
Benchmarking score	82
Category	Leader

## **Disclaimer**

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

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

*This modified version was applied consistently to all members' performance checks 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:

In 2019, Triaz (Waschbaer since 2020) showed advanced results on performance indicators and made substantial progress. Triaz monitored 99% of its own production and, with a benchmarking score of 81, has again been awarded the 'Leader' category.

Triaz has a systematic way of approaching Fair Wear membership, sufficient capacity to monitor and follow up and a dedicated attitude to inform, train and learn with suppliers on how to improve further. The brand has the ability to actually find root causes at the production location level and to identify measures to improve.

Triaz continued its efforts to work on the planning and prevention of excessive overtime in its supply chain, which seems to be reflected in 2019 audit results.

The root cause analysis on living wages not being paid in factories, despite buying prices that theoretically should suffice, continued in 2019, leading to more interesting findings. Triaz started working with a purchasing practices tool developed by the Partnership of Sustainable Textiles (PST) and is now aiming to do open costing with suppliers where its leverage is higher than 10%.

## 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.	71%	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.	3	4	0

**Comment:** 71% of Triaz's production volume comes from production locations where it buys at least 10% of the production capacity. Triaz has four main suppliers of which one is located in Germany. At three key production locations, and at several smaller suppliers, the brand's leverage ranges between 60-90% of the supplier's capacity. This makes Triaz a main clients at many production locations in its supply chain and it gives them a relatively strong position to work on the Code of Labour Practices (CoLP), together with these suppliers.

While on the one hand a large leverage provides opportunities, it also creates risks in terms of a business relationship that can be too depended and one-sided. It is therefore the ambition of Triaz to balance the purchase volume, from especially smaller suppliers, where the leverage is disproportionately high. That way, the supplier becomes slightly less dependent on Triaz. Triaz also aims to increase the supplier's leverage in business relationship.

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.	15%	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:** It was the ambition of Triaz to start consolidating its tail-end supplier base. However during 2019 Triaz realized that some of its main suppliers were performing differently than they had expected. The consolidation process was temporarily interrupted, but it is still the ambition of Triaz to continue to consolidate its tail-end going forward.

Internally Triaz completely restructured its purchasing and quality department so the need to keep the supplier base calm ended up taking priority.

**Recommendation:** Fair Wear recommends Triaz GmbH to consolidate its supply base by limiting the number of production locations in its 'tail end'. To achieve this, Triaz GmbH should determine whether production locations where they buy less than 2% of their FOB are of strategic relevance.

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.	75%	Stable business relationships support most aspects of the Code of Labour Practices, and give production locations a reason to invest in improving working conditions.	Supplier information provided by member company.	4	4	0

**Comment:** In 2019 75% of Triaz' production volume came from production locations where the brand's business relationship had existed for at least five years.

Triaz' sourcing strategy is focused on long-lasting partnerships with suppliers to deliver high-quality products consistently and show willingness to further increase sustainability (both environmental and social) in the production process. The percentage has increased slightly compared to previous year but remains at roughly the same respectable level.

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:** 3 new suppliers were added to Triaz's supply chain in 2019. In its supplier management system, orders cannot be placed before the questionnaire has been signed and returned. Triaz uploaded all questionnaires in Fair Wears' information management system which was confirmed prior to 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.	Advanced	Due diligence helps to identify, prevent and mitigate potential human rights problems at suppliers.	Documentation may include pre-audits, existing audits, other types of risk assessments.	4	4	0



**Comment:** The due diligence process for onboarding new suppliers is well-known within the company and clearly and consistently explained by the different departments. The Triaz internal wiki has a page which is designed as a checklist with several steps and clearly defined responsibilities of different departments when it comes to due diligence. When one step is finished, the next person receives a notification to proceed further. All steps need to be concluded and documented before sourcing can place any orders.

The first step is the buying department that identifies a new supplier. In the second step the CSR department is identifying country-specific risks, collecting previous audits, analyses and discusses the audit results with the supplier, sends and explains the Code of Labour Practices and receives the signed questionnaire back from the supplier. In addition to this, an intensive due diligence process for explaining and checking material specifications and ecological requirements is started. For each product, an article passport is developed. The final step is a visit to the potential new production location by a Triaz staff member. This happens prior to starting production.

Triaz sees the onboarding of new supplier as an investment.

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

**Comment:** Triaz has a supplier rating system to support its annual evaluation of all suppliers which is done by the so-called Supplier Management Project Team. Every department that has worked with suppliers is contributing to the rating system which is based on a fixed set of indicators. The CSR team indicators on social compliance give insight into the responsiveness of the supplier and the ability/willingness to improve on the remediation of CAPs and working on the CoLP. The price of a product is not included in the supplier rating.

The brand shares the results and areas of improvement with the supplier and together they set a timeframe to work on these.

The evaluation of the suppliers relates directly to production decisions. The CSR team can veto and if a supplier is not progressing on its social compliance the team can use this veto to terminate the relationship.

The suppliers with good ratings are generally given more orders, or Triaz can choose to work with closer with them on how to further support their work.

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:** Triaz has close cooperation and ongoing dialogue with its key suppliers and works together with them on the production planning. The production planning works slightly different depending on how the suppliers prefer to work.

At its Chinese supplier, Triaz shares a forecast for a year in November with monthly breakdowns and indication of minimum and maximum quantities. The plan is first discussed. Then the factory gives feedback and sets lead times, and finally the planning is adjusted. Triaz does an advanced payment to the factory to cover material costs. This factory struggles with scarcity of staff as a result of its location, the high cost of living in the area, and the competition from other industries. In case of late delivery, the brand adjusts its deadline and does not put extra pressure on its supplier, even if it means that new styles are not yet in stock when sales start.

At its Turkish supplier, Triaz has a comparable approach. To reduce overtime, Triaz and the supplier worked on ordering yarns in advance and building stock, which helped to shorten lead time.

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

**Comment:** There were no findings of overtime in 2019.

One factory did overtime when moving into a new building. This was accepted by Triaz and also the workers in the factory were compensated according to the regulations on overtime premium.

At Triaz Chinese supplier it is common practice to work overtime around Christmas or to earn some extra money for the Chinese New Year, but this is expected and non-excessive overtime and therefore accepted by Triaz. All-in-all Triaz has a very good overview and understanding of the root causes for overtime and the brand sees to that it is not excessively practiced.

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

**Comment:** For some years, Triaz has been working on open costing for all the main suppliers. The brand chooses to work on open costing and did a sample series of products to make the calculation. Triaz sees these sample products as representative of all styles produced by all factories. The samples are chosen by the purchasing department. CSR requests to include the relatively lower priced styles to ensure proper representation of the product line. At this point the brand chooses to spend their CSR capacity on the most urgent issues at their suppliers, namely planning and making sure the money reaches the workers.

For the samples at the main suppliers, Triaz knows the direct labour costs and the labour minutes per style. The brand is also aware of minimum wages per country and the Fair Wear wage ladders. For the selected products, Triaz made a calculation that demonstrates a link between their buying prices and wage levels at the production location. The methodology of how to calculate this is not clearly written down and is different than the methodology Fair Wear normally uses for this type of calculation.

At its Chinese supplier, the brand also made calculations for samples. The brand knows the cost breakdown of the different parts. The result of these calculations was that the supplier could pay the Asia floor wage living wage estimate for China to the workers, based on a calculation without overtime. Triaz is the only client of this factory and 30% owner as well. It has insight into the wages and checked what the supplier actually paid. It learned that the Asia floor wage living wage estimate for China was not paid in the previous year, although according to the calculation, the supplier should be able to pay this. Last year, it started a root cause analysis of why it was not been paid (see indicator 1.11)

For suppliers in Bosnia, Tunisia, and Turkey, calculations were made as well. For these factories result of the calculation was comparable: based on the prices for the sample styles, theoretically, wages could reach the level of a living wage estimate.

For these suppliers, the brand also started root cause analysis. If the theoretical calculation shows that living wage cannot be paid, Triaz will adjust the buying price accordingly. The actual findings however showed that prices were in many cases high enough to cover a living wage, but due to other factors the money does not reach workers so Triaz started to dig even deeper into the process.

Open costing is done consistently with suppliers with a leverage higher than 10%.

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:** There was a finding related to lack of payment of overtime premium at a factory in Romania. Triaz responded with decisive action by addressing the finding and made sure the situation was rectified.

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:** No evidence of late payments by the member brand.

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

**Comment:** As described under indicator 1.8, Triaz started assessing wage levels in their key production locations systematically to deepen their understanding of cost breakdowns.

For four suppliers the brand did a root cause analysis in 2018 after finishing the theoretical calculation. For the Chinese factory, this is described under indicator 1.8, including actions initiated after the root cause analysis. Triaz found that during the low season the wages were not sufficient to conform with Asian Floor Wage and the brand therefore started to spread its orders more evenly.

The root cause analysis in the Tunisian factory showed that the inflation rate of the Tunisian Dinar was an issue. To overcome this, Triaz and the supplier started to calculate the wages in Euro's and at that moment, depending on the currency, translate it to Dinar before paying wages. In theory this was a good solution but in practice it did not pan out in a reliable way since the government used the inflation rate in times of elections which caused great and unexpected fluctuations.

At their Bosnian supplier, Triaz has found another main root cause, related to legal constraints. Here the textile industry is relatively small and factories receive tax advantages if they keep the wages low. Other textile factories have a tendency to lower the wages, which means that for Triaz' supplier it was seen as a success that in the country if the minimum wage was kept steady and was not lowered. Triaz is looking for legal representation to look deeper into the issue and see if this taxation issue can be legally overcome.

In Turkey, there was a minimum wage raise of 30% in 2018. This already had financial consequences for the Turkish supplier, so Triaz decided not to push that supplier at this point in time to assure that the factory stays financially viable. Same decision was taken in 2019.

**Recommendation:** Fair Wear encourages Triaz to continue to involve worker representatives and local organisations in assessing the root causes of wages lower than living wages.

Working with translators as well as briefing the worker representation in advance could be way to lower the barriers of effective collaboration.

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).	12%	Owning a supplier increases the accountability and reduces the risk of unexpected CoLP violations. Given these advantages, this is a bonus indicator. Extra points are possible, but the indicator will not negatively affect an member company's score.	Supplier information provided by member company.	1	2	0

**Comment:** Triaz owns 30% of a production location in China (Representing 12% of Triaz' production volume).

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.13 Member company determines and finances wage increases.	Intermediate	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach.	Evidence of how payment below living wage was addressed, such as: internal policy and strategy documents, reports, correspondence with factories, etc.	2	6	0

**Comment:** In 2018 Triaz set a target wage for the Tunisian and Bosnian suppliers (24% of production volume). For the Bosnian supplier, where the legal constraints are an issue, several non-financial incentives were included like free lunches and coverage of transport costs, which are included in the expenses but not in the salaries. These kind of efforts, although helpful to the workers, are not counted by Fair Wear as efforts towards payment of a living wage.

Triaz continues to look for a "flexible" target wage so adjustments does not need to be made as frequent.

Meanwhile as an outcome Triaz has started working with a purchase practicing tool from developed by the Partnership for Sustainable Textiles (PST). The tool looks at the current situation, sets goals, establishes KPIs, identifies measures and sets timeline to achieve the outcome.

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.	24%	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.	2	6	0

**Comment:** For the Bosnian (24% of Triaz production volume) target wages are being paid.

At the Chinese supplier (12% of Triaz production volume) it is paying its share of to be able pay works a wage at the level of Asia floor wage living wage estimate for China, but since it could still not be documented that the money were in fact reaching the workers this percentage was not counted towards the score in this indicator.

For a Turkish and North Macedonian supplier target wages are set in 2019 at one supplier together with another Fair Wear member brand but still not paid in 2019. In North Macedonia a general increase in wage level was reached and the project is not yet completed.

In addition, Triaz is active on the topic of living wage for the production of their carpets, which is unfortunately not included in the product scope of Fair Wear.

**Recommendation:** It is advised that the outcomes of the root cause analysis are discussed internally and with top management, to form a basis for an embedded strategy. In addition, Fair Wear advises Triaz to start verifying and checking if the target wage is actually paid to the workers.

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## Purchasing Practices

**Possible Points: 52**

**Earned Points: 42**

## 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.	24%	
% of production volume where Fair Wear audits took place.	51%	
% of production volume where an audit took place.	75%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.	22%	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.	Yes	
Requirement(s) for next performance check		
Total monitoring threshold:	97%	Measured as percentage of production volume (Minimums: 1 year: 40%; 2 years 60%; 3 years+: 80-100%)

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.1 Specific staff person is designated to follow up on problems identified by monitoring system.	Yes	Followup is a serious part of 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:** Triaz has dedicated CSR staff members to follow up on problems 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

**Comment:** Member makes use of FWF audits and/or external audits only



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:** Fair Wear audit reports findings and Corrective Action Plans (CAPs) are shared with factory management and followed up during skype, email or visit. The audit and CAPs are not in all cases shared with worker representation, but Triaz is increasingly experimenting with the how to best involve the worker representation and will continue to see how this can be done in the best way.

**Recommendation:** Triaz should continue to make efforts to ensure that worker representation, where applicable, also receives the audit report and are involved in the establishment of improvement timelines.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.4 Degree of progress towards resolution of existing Corrective Action Plans and remediation of identified problems.	Intermediate	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.	6	8	-2

**Comment:** Triaz has a systematic and well-organized process in place to follow-up on CAPs. Triaz is cooperating with suppliers to remediate the issues identified in the CAPs, addressing both the issues that are easily solved as well as the more complex topics.

The brand has detailed knowledge of the situation at their main suppliers and is willing to find factory specific (root) causes to understand why issues are not yet improved.

Triaz does not yet systematically involve worker representation in the remediation process but is working on ways to make this a more imbedded approach in its CAP remediation strategy.

**Recommendation:** It is advised to include worker representation in the remediation process. Either to engage workers in identifying and implementing improvements or to verify realised improvements.

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.	85%	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:** 85% of the members production volume was visited in 2019.

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:** As described under indicator 1.4 external audits are gathered as one of the key due diligence steps. The reports are analysed and discussed with the production location.

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.	5	6	-2
Compliance with FWF enhanced monitoring programme Bangladesh	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF Myanmar policy	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on abrasive blasting	Advanced			6	6	-2
Compliance with FWF guidance on risks related to Turkish garment factories employing Syrian refugees	Intermediate			3	6	-2
Other risks specific to the member's supply chain are addressed by its monitoring system	Advanced			6	6	-2

**Comment:** All suppliers have signed and ensured they will not use abrasive blasting and this is part of the onboarding process to conform to Triaz' policy. This topic is also covered in the article passport, a document Triaz develops for each style which includes (environmental) information on materials and the different (chemical) processes.

Triaz has informed its Turkish suppliers on Fair Wears' policy on Syrian refugees and has been told that there currently are no Syrian refugees working at their factories. Furthermore, Triaz informed its suppliers on the possibility to hire Syrian refugees and to cooperate with United Work, an NGO that collects the CVs of Syrian refugees in Turkey.

Triaz is aware of other country-specific risks and addresses these during contact with its suppliers. The brand has several projects which have the aim to mitigate risks. All tiers of the production process are involved in the Silk project in China, which enables Triaz to improve worker rights throughout the supply chain. The rug project in India has a focus on home-workers and their basic rights.

For Triaz, technological innovations can also contribute to improving workers conditions, here under health and safety. Triaz has moved the production of its jeans to the new production location of one of its high-end ecological suppliers. In this new location, many of the tasks related to high health and safety risks are now done by robots meaning that workers are not getting in contact with the harsh chemicals anymore.

**Recommendation:** Fair Wear also this year recommends Triaz to formulate a detailed policy on Syrian refugee workers covering the responsibilities of the brand and its suppliers and shared them with their suppliers and an integrated part of the purchase agreement.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.8 Member company cooperates with other FWF member companies in resolving corrective actions at shared suppliers.	Active cooperation	Cooperation between customers increases leverage and chances of successful outcomes. Cooperation also reduces the chances of a factory having to conduct multiple Corrective Action Plans about the same issue with multiple customers.	Shared CAPs, evidence of cooperation with other customers.	2	2	-1

**Comment:** Triaz works very actively with other Fair Wear members and other brands in general on monitoring, visiting and remediation of Corrective Action Plans at shared suppliers.

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.	95%	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.:** Yes (1)

**Comment:** Triaz sources from 13 factories in Germany, Greece, Slovakia, Poland, Lithuania and Spain. Triaz received and uploaded the Fair Wear questionnaire in the data management system along with the worker information sheets as proof that they are posted in all locations. 11 out of the 13 factories situated in low risk countries was visited in the past 3 years amounting to 95% of the low risk country production volume.

Social audits were conducted at two Triaz suppliers in Germany and during the brand performance check the reports were presented as evidence.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.10 Extra bonus indicator: in case FWF member company conducts full audits at tail-end production locations (when the minimum required monitoring threshold is met).	Yes	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.	2	2	0

**Comment:** Triaz has conducted two audits in 2019 at tail-end suppliers.

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:** The approach of Triaz towards external brands is comparable to own production: The brand has sent and received the questionnaire and other relevant information and will also have collected audits or conducted audits at the external brands suppliers.

Triaz does not work with external brands if they do not agree on sharing production data.

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).	7%	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.	1	3	0

**Comment:** Triaz resells products of 4 Fair Wear member brands and 2 brands that are a member of FLA, jointly responsible for 7% of the external sales volume.

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: 35**

**Earned Points: 32**

### 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:** At Triaz the CSR team are designated to address 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:** Triaz has uploaded evidence of hanging worker information sheets (WISs) in the factories into the Fair Wear information management system.

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.	46%	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:** 47 % of Triaz' production volume was covered by actively raising awareness of the Fair Wear Code of Labour Practices and the complaint hotline. Triaz used the Fair Wear WEP basic training as their main awareness raising tool.

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:** Internal training has been improved and has become more specific at Triaz. There is now a training for Fair Wear only and a training directed toward the Partnership for Sustainable Textiles of which Triaz is also a signatory. In addition there is a training directed at the customer service. A leaflet on basic facts about Fair Wear and specific training of customer service relations team is also carried out by the CSR department.

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 receive additional training by the CSR team, including country-specific information.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices.	Yes + actively support COLP	Agents have the potential to either support or disrupt CoLP implementation. It is the responsibility of member company to ensure agents actively support the implementation of the CoLP.	Correspondence with agents, trainings for agents, Fair Wear audit findings.	2	2	0

**Comment:** The agents Triaz is working with are trained on Fair Wear requirements and support Triaz on following up on remediation and improvements.

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.		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.			

**Comment:** In 2019 a WEP factory dialogue training was conducted a one of Triaz suppliers in Turkey.

In additionally in 2019 an external communications training was conducted at its two Romanian suppliers. This training as arranged by another Fair Wear Member sourcing in the same two factories and the two brands collaborated on this.

The training efforts counting towards this indicator amounts to just above 10% of the brands total production volume.

**Recommendation:** Fair Wear recommends Triaz 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, Triaz 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.		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.			

**Comment:** For the trainings that took place in the two Romanian factories, the follow up points were included regular CAP follow up that is done with the factory.

For the Turkish supplier there was no active follow up on the training and considering that this supplier stood for 90% of the trained FOB, the follow up efforts was not scored in this brand performance check.

**Recommendation:** Fair Wear recommends Triaz to do an active follow up on all training sessions done in its factories in order to maximize the outcome and keep management and workers engaged in the transformations promoted by the training(s).

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## Training and Capacity Building

**Possible Points: 11**

**Earned Points: 5**

## 5. Information Management

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

**Comment:** Triaz is identifying also their tier 2 production locations. Their unique article passport keeps track of a products origin and all production locations and processes involved.

In the on-boarding process all production facilities are being disclosed and Traiz keeps strict track of their products countries of origin. Triaz benefits here from its long term relationship with most of its suppliers. The suppliers consult Triaz in case they want to subcontract and the CSR team is continuously doing random checking of shipments to confirm where items have been produced.

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:** In the Supplier Management Project group, the suppliers are discussed in the weekly meetings. The CSR team is part of this project group and actively share information about working conditions and other relevant issues.

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## Information Management

**Possible Points: 7**

**Earned Points: 7**

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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:** Triaz communicates about membership in catalogs, brochures and on its website. The communication is in line with the FWF Communication policy.

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:** The website(s) of Triaz contains the latest Fair Wear Brand Performance Check reports and Social Reports. The supplier list is how ever not yet publicly disclosed.

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:** Triaz has submitted its social report to Fair Wear and has published the report on its website.

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## Transparency

**Possible Points: 6**

**Earned Points: 5**

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## 7. Evaluation

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

**Comment:** Head of departments are in regular contact with top management and also with the suppliers. Fair Wear is considered an important partner and gets the full attention of top management at Triaz.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
7.2 Level of action/progress made on required changes from previous Brand Performance Check implemented by member company.	No requirements were included in previous Check	In each Brand Performance Check report, 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.	N/A	4	-2

**Comment:** No requirements were given in previous brand performance check.

## Evaluation

**Possible Points: 2**

**Earned Points: 2**

## Recommendations to Fair Wear

Triaz gives Fair Wear praises for hiring new brand liaisons to split the workload internally.

Triaz expressed that it believes Fair Wear is expanding faster than they are internally geared up for. The foundations and basics needs to be in place.

According to Triaz Fair Wear risks to get thrown off its primary course which is helping workers.

The discussion on transparency has not been fruitful. Rather than being a controller, Triaz would like to see Fair Wear become a service provider and a facilitator that helps brands.

Indicator 4.4. China monitoring. Advance collaboration between the members. 6 brands shared their information.

According to Traiz the communication between members can be improved dramatically.

The Member Hub is not used a lot. No reactions on posts does not promote activity. Higher complexity, different docking station how to enable communication between the communication department at the brands and Fair Wear.

## Scoring Overview

Category	Earned	Possible
Purchasing Practices	42	52
Monitoring and Remediation	32	35
Complaints Handling	7	9
Training and Capacity Building	5	11
Information Management	7	7
Transparency	5	6
Evaluation	2	2
Totals:	100	122

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

82

### Performance Benchmarking Category

Leader

## Brand Performance Check details

Date of Brand Performance Check:

05-10-2020

Conducted by:

Peter Jahns

Interviews with:

Joscha Hoffmann, Head of CSR

Jonas Munzer, CSR

Luisa Denter, CSR