

# **Brand Performance Check SOLO INVEST S.A.S**

**Publication date: July 2021** 

This report covers the evaluation period 01-01-2020 to 31-12-2020

### **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 <a href="https://www.fairwear.org">www.fairwear.org</a>. The online <a href="https://www.fairwear.org">Brand Performance Check Guide</a> provides more information about the indicators.

#### On COVID-19

This years' report covers the response of our members and the impact on their supply chain due to the Covid-19 pandemic which started in 2020. The outbreak of the Covid-19 pandemic limited the brands' ability to visit and audit factories. To ensure the monitoring of working conditions throughout the pandemic, Fair Wear and its member brands made use of additional monitoring tools, such as complaints reports, surveys, and the consultation of local stakeholders. These sources may not provide as detailed insights as audit reports. To assess outcomes at production location level, we have included all available types of evidence to provide an accurate overview of the brands' management systems and their efforts to improve working conditions. Nevertheless, brands should resume verifying working conditions through audits when the situation allows for.

## **Brand Performance Check Overview**

## **SOLO INVEST S.A.S**

**Evaluation Period: 01-01-2020 to 31-12-2020** 

Member company information	
Headquarters:	Paris , France
Member since:	2014-06-01
Product types:	Promotional wear and accessories
Production in countries where Fair Wear is active:	Bangladesh, Cambodia, China, Myanmar
Production in other countries:	Pakistan
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	95%
Benchmarking score	77
Category	Leader

## **Summary:**

SOL'S has shown advanced results on performance indicators and has made exceptional progress. The benchmarking score of 77 means that Fair Wear has awarded SOL'S the 'Leader' status. Although the monitoring threshold does not determine the category this year, SOL'S has fulfilled the monitoring requirements at suppliers responsible for 95% of its production volume.

#### **Corona Addendum:**

As a promotional wear brand supplying to large events, SOL'S was hit severely by COVID-19, as all events were cancelled for an extended period. The warehouses of SOL'S are based in Italy, France, and Spain, which are all countries that were hit hard by the pandemic. Most of the staff was on furlough for several weeks, but the CSR team continued its work, and their hours were not cut.

The brand showed huge commitment after the first signs of the pandemic and took a proactive approach. SOL'S top management contacted each supplier to emphasize that they would not cancel any orders. Meanwhile, SOL'S continuously evaluated its projected sales. They stayed in close contact with its suppliers to investigate the possibilities of postponing parts of the planned orders and rearranging the production schedule. This was done in close communication with each supplier.

At some point, SOL'S turnover dropped to 5% of each original turnover. The suppliers received a letter from the President of SOL'S in which they honestly explained the situation. SOL'S offered a full prepayment of running orders to its suppliers and requested in return a 2-3% discount. This would give suppliers enough cash flow to pay wages, and SOL'S could cover the extra warehouse costs and other COVID-19 related additional costs. The suppliers had the final say, and most (in most cases, long-term) suppliers agreed to this arrangement. Overall, the brand and suppliers showed mutual loyalty.

SOL'S strong monitoring and due diligence systems allowed a proper response to the COVID-19 crisis and a responsible process to investigate new business relationships in 2020. The brand kept detailed files to systematically track the situation per production location and collected the input through factory visits and questionnaires. Fair Wear did seven audits at suppliers in Bangladesh and China. During the monthly visits by the local CSR managers in Bangladesh and China, it kept close contact with worker representatives and discussed the situation on the ground to understand the needs of the workers better. Both on headquarter and local district offices, the committed teams showed a proper response following Fair Wear's quidance documents. SOL'S Sustainability Director and the local CSR staff visited the majority of production locations.

In 2020, SOL'S implemented a target wage to work towards a living wage at one of its suppliers in Bangladesh. The brand intends to roll this out to other suppliers in the coming years.

## **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.	91%	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:** SOL'S is an important buyer (leverage above 10%) for production locations that represent 91% of SOL'S total production volume. This figure remained about the same as the previous year, as SOL'S supplier base is stable.

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.	17%	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:** A total of 17% of production volume comes from locations where SOL'S buys less than 2% of its total FOB. This figure is similar to the previous financial year.

Even though SOL'S focus is on t-shirts and sweaters, a certain amount of smaller suppliers is used to fill up the catalog with additional products. According to SOL'S, a certain degree of diversification is needed from a risk management perspective. The percentage decreased with 1% compared to the previous year.

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.	52%	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.	3	4	0

**Comment:** SOL'S maintains a long-term business relationship (of at least five years) with suppliers representing 52% of the total production volume. The majority of this percentage is even represented by suppliers that have been working with SOL'S for at least ten years.

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

**Comment:** In 2020, SOL'S added four new production locations to its supply base. Questionnaire and worker information sheets are uploaded for each location 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.	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: SOL'S has a strict due diligence process for starting up a new business relationship. This takes between four and six months. SOL'S uses a start-up package to be filled in by each potential supplier as a first step. This package includes Fair Wear's Questionnaire, SOL'S Code of conduct, Supplier profile and SOL'S general conditions. These requirements are also behind each production order. All suppliers have to return all four documents which are contractually binding, and also any relevant certification documents.

The CSR manager checks if audit reports are available (with the main focus on BSCI reports including a thorough CAP analysis). A thorough check on legally binding contracts for each worker is also done by local staff. All data is filed in one central document to be able to monitor status and prioritize in case of missing information. The gathered information is cross-checked during factory visits, all prior to placing orders.

During the COVID-19 pandemic of 2020, the described approach was followed as usual. SOL'S stayed in frequent contact with its suppliers via e-mail and phone. Also, the local staff in Bangladesh as well as the Quality Director continued to visit production locations throughout the pandemic.

SOL'S used Fair Wear's country-specific guidance and COVID-19 impact was widely discussed with each supplier, both during visits, via email and video meetings. SOL'S top management invited each supplier for personal video meetings to ask how each of them was doing - as a person and as business.

SOL'S has systematically kept track of the COVID-19 related risks in their main production country Bangladesh by creating due diligence sheets in Excel with action plan, wage payment situation, government support, and risks per supplier. SOL'S used these sheets to monitor the situation in the factory, follow up and remediate where possible. SOL'S filled health & safety checklists every month, to check the measures related to COVID-19 in the factories. Local staff in Bangladesh check health and safety during the daily factory visits. Updates were shared frequently and taken up in the COVID-19 excel sheets per supplier.

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: SOL'S evaluation system assesses factories every six months resulting in a supplier ranking. This allows the member to compare factory performances. The evaluation goes with a CAP and a deadline of six months for factories to improve. Then the CAP follow-up is made every month and checked by buyers, production managers, and quality managers. At the end of 2019, SOL'S started to do monthly KPI analysis for each production location. Every three months a complete KPI check and report are generated. If improvements are made the collaboration can continue. On the opposite, if the evaluation rating goes down, the potential ending of collaboration is discussed in meetings involving all teams. In 2020, the evaluation of one supplier in Bangladesh resulted in a production decision; the business relationship was ended due to subcontracting issues. A responsible exit strategy was followed by SOL'S.

Due to COVID-19, some of SOL'S orders were postponed in consultation with the suppliers, yet none of the orders was cancelled. In China and Myanmar, SOL'S kept in contact with its suppliers through the local staff member to monitor the changed order schedule and the Chinese suppliers indicated there were no issues. In Bangladesh, SOL'S agreed with the factory to slow down the orders, as sales dropped drastically. And later, suppliers requested a slow down, as lead times were longer due to restricted working hours as per government directions. When capacity was back to its original level, orders were regained. In some cases, SOL'S placed extra orders at suppliers which had a lot of available capacity, for example by starting mask production at one of its French suppliers.

SOL'S was in close contact with the suppliers to keep track of the impact of COVID-19 on them.

The company offered to completely prefinance all orders, in order to enable proper wage payment during the pandemic. In return, SOL'S requested a 3% discount. Each supplier was free to decide whether or not to take the offer. Several suppliers indicated that this move was very much appreciated. To make sure wages were paid, SOL'S monitored this close and could show proof during the performance check.

None of the planned audits was cancelled. With the frequent visits of the Quality Director and its overall high involvement, a clear overview was gained on the situation at each supplier. All information was documented and SOL'S was able to show e-mails and files during the brand performance check.

**Recommendation:** As it is not always possible to reward suppliers with more volumes, SOL'S could look into other incentives that reward supplier's commitment towards the CoLP. An example would be to offer training for skill building/capacity development, placing more NOS styles.

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: SOL'S has a very strong and detailed production planning system and knows the output of each line per day. SOL'S has a forecast of six months or one year depending on products. "Programmes of production" are communicated and agreed on monthly with suppliers with the lead time between 90 to 120 days. Since products have very similar styles more or less the same colour and quantities (for t-shirts and polos mainly) are very big - there is a need for high productivity. SOL'S and its suppliers work with a well-tuned production forecast where only fine-tuning is needed. When small adjustments are needed, those are communicated in advance to factories so they can plan production capacities.

The production schedule allows SOL'S to follow the production steps at any stage of production/shipping, and see where bottlenecks lie. When the situation seems to be sensitive regarding overtime, the brand can also reduce quantities if needed and production time can be spread out on several months or orders could be reshuffled to other production locations. Bulk orders are always placed with a shipment date instead of a delivery date. Advanced payment is 40 to 60% of the total amount, giving the factory liquidity upfront. Also, at least two production locations are used for the same style, to give space for delays. Given the timeless styles, the huge stock to absorb delays, and the absence of fast fashion cycles, SOL'S believes that overtime is not needed for their orders.

During the COVID-19 pandemic, the weekly production meetings continued and the planning system proved to be strong. Suppliers' input was gathered on a weekly basis to understand the situation and possibilities to reschedule production were investigated. Capacity per supplier per style was closely monitored, as per its usual system. The reduction in capacity coincided with the period in which SOL'S experienced a reduction of sales, which eased the rescheduling. Each decision was made in agreement with the factory management. Any delay was simply accepted.

Both Purchasing Department, CSR and CEO were part of the weekly production meetings, to ensure internal support. Correspondence was shown between the president of SOL'S and the main suppliers in which possibilities and requests were shared. SOL'S showed commitment and transparency, by taking into account the supplier's situation and being open about the challenges on SOL'S end.

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:** Overtime issues were found in several audits in Bangladesh and China. SOL'S' focus has been to make overtime traceable and voluntary.

At one of the audited factories in China where overtime was found, SOL'S has already started the exit procedure (due to the lack of CSR commitment). Remediation and understanding of root causes was therefore very difficult. Since 2019, SOL'S opened an office in China, which created more opportunities to investigate root causes of overtime and improve its monitoring system. Given the extraordinary events of 2020, the focus of this employee has mainly been the COVID-19 related risks. During the pandemic it has been difficult to discuss the matter of excessive overtime. SOL'S believes that most of the excessive overtime in China occurred right after Chinese New Year and just before COVID-19 hit; pressure to finalize running orders before everything was shut down. The focus of the Chinese office has been to check whether the overtime found in audits was done voluntarily - SOL'S employee in China interviewed workers to investigate this. In Bangladesh, several overtime issues were found and a clear message was sent to the main suppliers by SOL'S to not push workers but reemploy wherever possible. SOL'S believes that the pandemic has been a trigger for excessive overtime and that long-term planning is important to prevent this. SOL'S is well aware of suppliers' capacity, number of workers, and number of machines. Thanks to the frequent factory visits, by both the local teams and the Quality Director, SOL'S investigated root causes by conversations with workers and management and onsite inspection. SOL'S believes that shipment issues and back lock of other buyers with short lead times are the main root causes for excessive overtime. After the lockdowns, SOL'S slowly restarted production in close contact with its suppliers, to make sure quantities were coinciding with the lower capacity, to avoid the risk of excessive overtime.

Six audits with relevant audit findings were conducted at the end of 2020, and reports were only received in 2021. Therefore, specific follow-up and remediation will be further assessed in the next performance check.

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:** Price negotiation goes through monthly "programs" which are fixed agreements, orders placed are never reduced so it allows having a flat production for factories and avoids peaks, and to fill in sewing lines consistently all year long.

SOL'S works with open costing at all its production locations in Bangladesh. Combined with its stable production pattern for basic items like t-shirts, SOL'S has a good and complete overview of wages including for the different grades with a rather stable fabric price for each style.

SOL'S is in direct contact with most of the yarn suppliers, with which they set a price for six months. If prices increase in that period, they will be adjusted in the FOB price. If prices decrease, the benefit is for the yarn supplier.

At one supplier in Bangladesh, SOL'S could show efforts to link buying prices with wage levels, in collaboration with another Fair Wear member. The two member companies found that workers' wage levels were defined for a different sector instead of the garment sector. This finding has been discussed with the supplier, which led to a dialogue about raising the buying prices as a means to directly raise the wages. This is a good step towards more insight into the link between buying prices and wages. For the suppliers in China, this is more difficult, as leverage is low.

SOL'S discussed additional costs for COVID-19 measures, but a concrete plan to include additional costs in the minute prices was not yet made. SOL'S has a very stable relationship with its suppliers and upcharges are requested in case this is needed.

**Recommendation:** Fair Wear recommends SOL'S to expand their knowledge of cost break downs to calculate the labour minute costs of its products to be able to calculate the exact costs of labour and link this to their own buying prices. Fair Wear's labour minute value and product costing calculator also enables suppliers to include any COVID-19 related costs. Priority would be to make sure this level of transparency can be achieved with their suppliers.

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.	O	O	-2

Comment: Findings during the audits done in 2020 by Fair Wear indicated legal minimum wage issues; failure to pay annual or holiday leaves, payment of legal minimum wage and/or incomplete wage data to verify payment of minimum wage. SOL'S could show proper follow-up of most of the findings. The issues have been raised with factory management and wage risks are checked frequently by local offices in Bangladesh and China, as well as by the Sustainability Director. Findings related to wages are discussed case by case and clear insight was shown for each of the audited suppliers during the performance check.

At one supplier in Bangladesh, a worker was not paid properly which came to light through the factory questionnaire. SOL'S immediately sent a clear message to the factory management and the issue was taken up and solved, evidence provided. During the COVID-19 pandemic, salary sheets have been collected by SOL'S from its main suppliers to monitor wage payment during lockdowns. Also, SOL'S offered prepayment to ensure continuation of payment of wages. Follow-up of the findings from audits in December 2020 will be verified in the next financial year, as the report was received in 2021.

**Recommendation:** Fair Wear strongly recommends SOL'S to always verify whether legal minimum wage issues have actually been resolved in case factory management claims so. SOL'S 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:** No evidence of late payments to suppliers by SOL'S was found.

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

**Comment:** SOL'S has started to address the topic of wages below living wages with its main suppliers. SOL'S uses audits to verify the wage levels at the suppliers, in 2020 seven audits were done. Together with another Fair Wear member, SOL'S created a wage analysis to investigate wages below living wage at one of its suppliers in Bangladesh.

During the COVID-19 pandemic, SOL'S stayed in close contact with its suppliers about the payment of wages. Monthly payment sheets were analyzed to monitor that wages did not decrease due to the crisis.

SOL'S attended Fair Wear's living wage webinar and has been working on wage calculations. A first assessment gave SOL'S more insight into the underlying issues, such as the limited options for workers to move up the ladder because one is placed in a certain wage bracket for too long. This insight encouraged dialogue with suppliers on proper payment; does a worker get paid according to its experience and type of job?

**Recommendation:** Fair Wear encourages SOL'S to discuss with suppliers about different strategies to work towards higher wages. It is advised to start with suppliers where the member is responsible for a large percentage of production and long-term business relationship.

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.13 Member company determines and finances wage increases.	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:** SOL'S has strong planning systems in place and showed good examples of first steps to determine wage increases, such as wage slip analyses and dialogue with suppliers.

For one supplier a target wage was discussed and investigated, together with another Fair Wear member brand. The supplier was asked to indicate the price increase needed to meet the target wage. The indicated buying price was agreed to by SOL'S and proof was shown that wages were increased as a result of the price increase.

**Recommendation:** In determining what is needed and how wages should be increased, it is recommended to involve worker representation.

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.	1%	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:** As described in 1.13, SOL'S increased its prices at one supplier in Bangladesh to pay higher wages. SOL'S provided evidence to show that its payment of higher prices was directly linked to the increased wages.

**Recommendation:** SOL'S is encouraged to roll out its approach to other suppliers. Fair Wear encourages to continue working on the topic of raising wages with clear target wages and verifying the wage increases at the supplier level.

## **Purchasing Practices**

**Possible Points: 52** 

**Earned Points: 36** 

# 2. Monitoring and Remediation

Basic measurements	Result	Comments
% of production volume where an audit took place.	95%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.	0%	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:	95%	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: SOL'S Sustainability Director is in charge of following up on the problems identified. During COVID-19 the working hours of CSR staff was not reduced.

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

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

**Comment:** Audit Reports and CAP findings are shared with factory and worker representation where applicable. Improvement timelines are established. In the follow-up of corrective actions, SOL'S includes local staff. CAPs are also discussed in meetings with other departments which then follow up on improvement with factories every month.

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:** SOL'S has a clear system to file and monitor progress on active Corrective Action Plans (CAP) with factories. A CAP status check is done every month, with a focus on planning, quality and CSR. Local offices and relevant staff (such as the responsible buyer) are involved in the CAP follow-up and coordinated by the Quality Director. The system works with color categorization, indicating the priority of each finding.

SOL'S Quality Director visits Bangladesh two weeks per month, which enables him to act immediately on critical findings for the majority of the suppliers, as most of them are based in Bangladesh. Visits are done regularly, by both the Quality Director and the local team in Bangladesh. These factory visits continued during the pandemic. In the case of critical findings, top management is involved. Less critical findings can be handled through visits by the local team. Feedback from the factory management on the implementation status of improvements is also checked by SOL'S local staff who visit the production sites regularly. This is done in Bangladesh and in China.

Despite the COVID-19 pandemic, audits were conducted at seven suppliers in 2020 at factories in Bangladesh and China. Several of the audits were postponed to the end of the year, but all planned audits could be conducted. Follow-up of the CAPs was done by agreeing on a clear time path with the suppliers. A working file was updated with supporting documentation as proof of remediation, such as salary sheet, photos and videos, shown during the performance check. For each supplier worker representation was involved in the follow-up, also during COVID-19. This was possible thanks to the local staff present in both Bangladesh and China.

The COVID-19 situation was monitored by collecting updates from BGMA (employers association) in Bangladesh, RSC guidelines, and the frequent factory visits of local staff. For each supplier, SOL'S keeps a detailed Excel file with all COVID-19 related information per supplier, which is shared with relevant staff.

In Bangladesh, most audits show findings related to safety and health, working hours and living wage. Findings were discussed with the suppliers and CAPs are used to work on corrective actions. During COVID-19, SOL'S staff interviewed workers to double-check working hours and payment of wages.

One of three audited suppliers in China is in the phase-out process, as CSR commitment is lacking. SOL'S started a responsible exit procedure. For the other two audited factories in China, SOL'S could show proper remediation with documentation as proof.

**Recommendation:** Fair Wear encourages SOL'S to continue strengthening their system to analyse how they might have contributed to findings and what changes they can make in their purchasing practices.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.5 Percentage of production volume from production locations that have been visited by the member company in the previous financial year.	not applicable	Due to the Covid-19 pandemic, brands could often not visit their suppliers from March - December 2020. For consistency purposes, we therefore decided to score all our member brands N/A on visiting suppliers over the year 2020.	Member companies should document all production location visits with at least the date and name of the visitor.	N/A	4	O

**Comment:** Travel was restricted due to the COVID-19 pandemic, therefore this indicator is not applicable for this year. Yet SOL'S managed to visit over 80% of its production locations in 2020.

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: Third-party audit reports are collected by SOL'S as part of the due diligence process for potential new production locations. The Fair Wear audit quality assessment tool was not used to assess these external audit reports, but SOL'S could show proof of diligent analysis and follow-up on the CAPs in cooperation with factory management.

During the pandemic, SOL'S has collected external audit reports from two-third of its suppliers. Assessing external reports has been helpful to cross-check conditions per supplier. Implemented corrective actions were shown during the performance check.

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

**Comment:** SOL'S identifies and monitors common risks in its supply chain using guidance and reports from Fair Wear and other non-governmental organisations.

#### Bangladesh

SOL'S is aware of the risks in Bangladesh and stays up-to-date about these risks by consulting the Fair Wear country team regularly, working with local staff members and information gathered in audit reports. SOL'S is a signatory of the Bangladesh Accord on Fire and Building Safety. All production locations in Bangladesh fall under the Accord. The local staff of SOL'S in Bangladesh visits all sites on at least a monthly basis. A Health and Safety checklist is filled during every visit and outcome is systematically shared with CSR team. For the main suppliers, SOL'S has facilitated its own training on Health and Safety and gender-based violence, yet not through Fair Wear's WEP or equivalent.

#### China

SOL'S is well aware of the risks in China, such as prison labour, subcontracting (in general and to North Korea), lack of transparency regarding resources used. There are various ways in which SOL'S addresses these risks: relationship building, discussing the importance of transparency and unannounced inspection by third parties. A local person was hired to improve the monitoring system and better address country specific risks. A new risk addressed by SOL'S is imported labour, which is spread over China. During the frequent factory visits, SOL'S checks for dormitories, types of labour contracts and also different dialect to monitor signs of imported labour.

#### Myanmar

Factories in Myanmar are in many cases run by Chinese owners, which means a different culture and a lack of direct contact. SOL'S works with a local agent for quality and CSR checks at its two suppliers. The Sustainability Director schedules meetings through videolinks, external audit reports are collected and during factory visits SOL'S always involves a local social worker. Child labour and wages are risks that SOL'S is aware of and checks through audit reports and factory visits.

#### Cambodia

SOL'S is aware of the risks in Cambodia. A local Cambodian HR person was hired to pay extra attention to wages and working hours during factory visits and audit report assessment. As social dialogue between the Chinese management and Cambodian workers is important to mitigate risks, SOL'S offered Chinese lessons to the HR to be able to improve communication between management and workers. Even though less than 1% of SOL'S production volume comes from Cambodia, the member takes its responsibility by making sure that risks are identified and the environment for social dialogue is improved.

#### COVID-19

At the start of the pandemic, SOL'S President wrote a personal letter to its main suppliers to assure that orders would not be cancelled. The Quality Director and its CSR team monitored COVID-19 related risks following Fair Wear guidelines, during regular video meetings, calls, visits and through a questionnaire. All factories provided health and safety measures for workers and complied with local regulations. SOL'S received photographic evidence and frequent visits were made by CSR staff throughout the year. Even though travel was restricted, SOL'S felt the responsibility to continue its factory visits to monitor the situation, while taking the necessary precautions such as testing before and quarantine after each visit. The suppliers' main challenge was the spare capacity they had due to the pandemic. SOL'S kept in close contact to discuss what could be done on a case by case basis. Rescheduling production during the periods of lockdown and restarting was discussed with each supplier and conversations about risks such as job loss and wage payments were shown. SOL'S offered to make prepayments for those suppliers that were interested, in order to ensure wage payments.

#### **Recommendation:** Bangladesh:

In terms of ensuring women's safety at work, SOL'S should make sure that suppliers have sufficient knowledge and a functional system to promote gender equality and prevent gender-based violence. A functional system to prevent violence needs the involvement of both factory management and workers representatives. Fair Wear's local team has extensive experience in supporting both employees and employers in setting up anti-harassment systems and could provide training as well as regular support to suppliers upon request.

#### Myanmar:

SOL'S is advised to promote processes to ensure Freedom of Association and enhance social dialogue at suppliers. In this regard, the brand could enroll the factory in Fair Wear's WEP-COMMUNICATIONS that aims to strengthen social dialogue at participating factories.

SOL'S is advised to enroll factories in FWF's training on age verification. The training will be arranged by Fair Wear on an annual basis and is (for the moment) free of charge.

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:** CAP follow-up and complaint follow-up were done in collaboration with other Fair Wear members 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.	No production in low-risk countries	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.	N/A	2	0

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: SOL'S conducted full audits at four tail-end production locations in China in 2019 and 2020.

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	O

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: 24** 

**Earned Points: 20** 

# 3. Complaints Handling

Basic measurements	Result	Comments
Number of worker complaints received since last check.	4	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.	2	
Number of worker complaints resolved since last check.	3	

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:** Sol's Quality Director together with the CSR manager is in charge of complaints follow-up.

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:** For all new suppliers, photographic proof was shown of the posted Worker Information Sheet.

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.	1%	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 workermanagement 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:** One supplier was enrolled in the WEP basic module in the past three years, representing 1,32% of Sol's total production volume.

Fair Wear's COVID-19 workers' rights videos were not used, as these were not available for the production countries Sol's works with. The CSR team stayed in close contact with each supplier and invested in raising awareness of the CoLP and complaints hotline among workers.

**Recommendation:** Fair Wear recommends SOL'S to actively raise awareness about the Fair Wear Code of Labour Practices and Fair Wear complaint helpline among a larger portion of its suppliers. SOL'S should ensure good quality systematic training of workers and management on these topics. To this end, SOLO INVEST S.A.S can either use Fair Wear's WEP Basic module, or implement training related to the Fair Wear CoLP and complaint helpline through third-party 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
3.4 All complaints received from production location workers are addressed in accordance with the FWF Complaints Procedure.	Yes + Preventive steps taken	Providing access to remedy when problems arise is a key element of responsible supply chain management. Member company involvement is often essential to resolving issues.	Documentation that member company has completed all required steps in the complaints handling process.	6	6	-2

**Comment:** In 2020, four complaints were received by workers at Sol's suppliers. Two in Myanmar and two in Bangladesh. The complaints were related to Freedom of Association, Discrimination, Health and Safety, wages and working hours. All complaints were addressed in accordance with the Fair Wear Complaints Procedure and it was shown that Sol's took the necessary steps to resolve the issues.

The two complaints in Myanmar were related to the case of retrenching 112 workers of whom 110 were members of a labour union. Although the factory claimed that they have to retrench workers because they lost orders from non-Fair Wear customers, they still needed to hire daily workers because of the workload and share the capacity of orders with two subcontractors. Sol's could show immediate and accurate responses. In collaboration with a non-Fair Wear member, an agreement was signed by all parties involved and all workers were either fully paid by an offered settlement or were reinstated.

Another complaint was filed by a worker at a supplier in Bangladesh, shared with two other Fair Wear members. Sol's showed proper follow-up, included worker representatives, and took preventative steps by raising awareness among staff and workers and encouraging the factory to organize a WEP training.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.5 Cooperation with other customers in addressing worker complaints at shared suppliers.	Active cooperation	Because most production locations supply several customers with products, involvement of other customers by the 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.	2	2	0

**Comment:** SOL'S cooperated with other customers in addressing worker complaints. At the supplier in Bangladesh, active cooperation was shown between SOL'S and two other Fair Wear member companies. At the supplier in Myanmar, active cooperation took place with a large non-Fair Wear member brand in resolving the filed complaints.

## **Complaints Handling**

**Possible Points: 17** 

**Earned Points: 15** 

## 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:** As part of the introduction for new employees, information is shared about the company's charter and values is shared. Every new staff will spend time in each department to learn about their work, which means they will necessarily hear about Fair Wear membership. This happens for staff at the local office in Bangladesh as well.

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:** Regular Management meetings and Salesforce meetings are held throughout the year. In both meetings, KPIs results are shared and when relevant, updates about Fair Wear membership are also shared.

During the monthly meetings between all departments, the next 12 months of work and adjustments are discussed and planned.

The Bangladesh team is closely involved in CAP follow-up and frequently discusses status with the Quality and CSR manager, during his frequent visits to Bangladesh.

In general, when staff members travel they need to use a health and safety checklist as part of SOL'S awareness and engagement process. This is coordinated by the Quality and CSR manager.

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:** SOL'S needs support from agents/traders in order to source some specific products and manage some factories' relationships. Agents are given an important role in monitoring subcontracting and overall communication with the factories. Factory visits are often done by SOL'S, together with the agent involved.

**Recommendation:** If SOL'S delegates CAP follow-up and monitoring to agents, it should inform them about the FW COVID-19 guidance and ensure agents are enabled to monitor the impact of COVID-19 on suppliers.

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:** Apart from discussing the topic of training, there was no participation in training programmes that support transformative processes related to human rights in 2020. This was mainly due to the restrictions related to the COVID-19 pandemic. Several training programmes are scheduled for 2021.

**Recommendation:** Fair Wear recommends SOL'S to implement training programmes that support factory-level transformation such as establishing functional internal grievance mechanisms, improving worker-management dialogue and communication skills or addressing gender-based violence. Training assessed under this indicator should go beyond raising awareness and focus on behavioral and structural change to improve working conditions. To this end, SOL'S 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: 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:** SOL'S has a clear policy on subcontracting with a written agreement for all its suppliers. A strict policy is used in case production locations seem dishonest about subcontracting. Compliance to this policy continued during COVID-19, thanks to the local staff in both China and Bangladesh.

The local team in Bangladesh conducts unannounced inspections to constantly monitor production and crosscheck planning with capacity. The Quality Manager visits the main suppliers in Bangladesh twice per month and the local staff monitors production planning on a daily basis.

For China, SOL'S has a sourcing manager, who visits the supplier to ensure compliance with the brand's social compliance policies.

The remaining production countries are covered by the CSR team and visited frequently.

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:** CAPs are discussed in meetings between buyers and the quality team before sharing those with the factories. Teams in contact with factories work together to create the suppliers' evaluation system described in 1.5. Fair Wear tools, such as the Health and Safety checklist are used by relevant staff during factory visits. The outcome is reported back to the rest of the team.

The CSR and Quality team in charge of Fair Wear implementation receives order emails sent by buyers to factories, so they can follow up on production schedule etc. The local CSR and Quality staff in Bangladesh and China used the Fair Wear checklists, as the buying team did not visit factories in 2020, due to COVID-19.

## **Information Management**

**Possible Points: 7** 

**Earned Points: 7** 

## **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:** SOL'S publishes information about Fair Wear Foundation and its membership commitments on its website. All communication is in line with Fair Wear's communications policy.

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:** SOL'S supplier list has been disclosed to the public through the Fair Wear website.

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

**Comment:** The social report is submitted to Fair Wear, but not published on the member's 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:** SOL'S considers its Fair Wear membership as a core part of its business and an important basis for improvement on social compliance and more transparency.

Fair Wear membership is on the agenda of management's monthly meetings. Managers meet every two weeks where all departments share KPIs and main updates including Fair Wear topics: points of information/points of decision making and brainstorming. If decisions need to be escalated it comes back up to discussion with the President.

During the pandemic, the contact with top management was intensified to ensure proper rescheduling of production. CSR team has been more involved in the overall planning and business, as the Sustainability Director travels often to the production countries, but also because CSR is more integrated into the brand.

The President of SOL'S is also directly in contact with long-term suppliers to discuss matters and travels twice a year to the production locations. In 2020, a one-on-one video meeting was arranged with each long-term supplier.

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.	70%	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.	4	4	-2

**Comment:** A total of five requirements were given to SOL'S in the previous financial year. Progress was shown on all of the indicators. For indicators related to living wage, small steps were taken, and therefore will only be counted partly. For the other two indicators, 1.3 and 1.9, clear progress was made.

## **Evaluation**

**Possible Points: 6** 

**Earned Points: 6** 

## **Recommendations to Fair Wear**

- SOL'S highly values the Fair Wear gatherings and has missed the offline interaction during this pandemic year.
- The member requests more audits and training availability.
- SOL'S recommends Fair Wear to develop tailor-made training session on sexual harassment for larger suppliers with various production locations in Bangladesh.
- SOL'S suggests changing the leader logo on-garment rules -make it usable for each garment produced in the year that the brand was a Leader.

# **Scoring Overview**

Category	Earned	Possible
Purchasing Practices	36	52
Monitoring and Remediation	20	24
Complaints Handling	15	17
Training and Capacity Building	5	11
Information Management	7	7
Transparency	6	6
Evaluation	6	6
Totals:	95	123

Benchmarking Score (earned points divided by possible points)

77

Performance Benchmarking Category

Leader

## **Brand Performance Check details**

Date of Brand P	erformance	Check:
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09-06-2021

Conducted by:

Hendrine Stelwagen

Interviews with:

Geert de Wael - Quality, R&D and Sustainability Director Ashikur Rahman - CSR Manager