



Brand Performance Check

The Woody Group

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

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

The Woody Group

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

Member company information	
Headquarters:	Gent , Belgium
Member since:	2019-06-01
Product types:	Garments, clothing, fashion apparel
Production in countries where Fair Wear is active:	China, Turkey, India
Production in other countries:	
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	92%
Benchmarking score	69
Category	Good

Summary:

The Woody Group (TWG) has met most of Fair Wear's performance requirements. The company has monitored 92% of its purchasing volume and exceeds the threshold for second-year members. Combined with a benchmark score of 69, the monitoring percentage means that Fair Wear has awarded The Woody Group the 'Good' category.

Corona Addendum:

Due to the nature of its collection, sleep and loungewear, The Woody Group (TWG) did not experience a significant decline in sales during the Corona pandemic. As such, TWG only needed to reduce working hours for CSR staff during the first lock-down in Belgium. As a response to the spread of the virus, TWG started to produce face masks in Turkey and focused more on online sales.

TWG had just received its collection in-house at the start of the pandemic and had just placed its orders for the new season. With retail being closed in Europe, TWG experienced some liquidity issues, which were solved by asking for extended payment terms from its suppliers. TWG could show this was done in dialogue with the suppliers, but the brand did not actively verify whether the extended payment terms caused difficulties with paying wages. The brand has not cancelled or reduced planned orders.

As main risks related to COVID-19, TWG identified the risk of the spread of the virus on the factory floor and workers not getting paid during factory closures.

TWG produces most of its collection at its factory in Turkey. It was relatively easy for the company to maintain good contact with the factory, ensure that it took solid OHS measures, and paid workers during factory lock-downs.

While visits were not possible, the CSR manager set up regular video calls with its Indian suppliers. The brand could also show it actively offered its support with OHS measures and checked what measures were taken by the factory. Through an audit in 2020, it could verify that wages were paid during lock-down periods there as well.

It was more difficult to set up video calls with its Chinese suppliers, and the primary contact was through email. TWG did not verify whether wages were paid during lock-down periods.

At the start of the pandemic, TWG was advised on OHS measures by one of its Chinese suppliers to prevent the virus from spreading on the factory floor. For example, how to keep an appropriate distance between workers and place disinfection tools in the factory's central places. The company has shared this information with its own and the other factories by mail.

To sum up, TWG has been able to remain in regular contact with most of its production sites and did not make unilateral decisions. The brand identified some main risks and actively followed up with the suppliers to understand the situation in the factories. TWG could have taken more action to remain in contact with its Chinese production sites.

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.	94%	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: The Woody Group (TWG) sources from production sites in Turkey, India and China. The company sources mainly from its own factory in Turkey (85 % of its production), TWG fills up 100 % of the production capacity of this facility. The CEO of this facility is also the CEO of TWG. In addition, TWG sources from two other suppliers where it takes up more than 10% of the production capacity.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.1b Percentage of production volume from production locations where member company buys less than 2% of its total FOB.	6%	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.	3	4	0

Comment: Six percent of TWG's production is produced at factories where the company buys less than two percent of the total production volume. In total this concerns six of its nine suppliers. In 2020, one sock supplier decided to stop collaboration with TWG because the minimum order quantity (MOQ) of TWG was too low. At the same time, TWG reinitiated cooperation with two factories in China to include woven products in the collection.

Recommendation: Fair Wear recommends TWG to consolidate its supply base by limiting the number of production locations in its 'tail end'. To achieve this, TWG should determine whether production locations where they buy less than two percent of their FOB are of strategic relevance. Shortening the tail will reduce the social compliance risks the member is exposed to and will allow the member to improve working conditions in a more efficient and effective way. It is advised to describe the process of consolidation in a sourcing strategy that is agreed upon with top management/sourcing staff.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.2 Percentage of production volume from production locations where a business relationship has existed for at least five years.	93%	Stable business relationships support most aspects of the Code of Labour Practices, and give production locations a reason to invest in improving working conditions.	Supplier information provided by member company.	4	4	0

Comment: TWG highly values long-term business relationships with its suppliers, it has a business relation of over five years with most of its production partners representing more than 90 % of the total production. The member's main partner is the production facility in Turkey. Since 2017, TWG is owned by the factories' CEO. TWG considers it in its own best interest to have a long-term relationship with its suppliers. The company finds good relationships with the suppliers is key for trusting them with the production of their garments. In 2020, TWG has formally integrated its policy on long-term business relationships within its sourcing strategy.

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, TWG started working with two new factories. Both factories have signed the Code of Labour Practises.

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

Comment: In 2020, TWG added two suppliers to its supplier base. As a standard practice, TWG's CSR manager visits and requests audit reports before starting a new business relationship. In addition, TWG has included a country risk analysis of its production countries in its purchasing strategy. The analysis is used to check on possible risks with new suppliers. The CSR manager together with the collection manager make the final decision on whether to start a new business relationship with a certain supplier.

Unfortunately, due to COVID-19 it was not possible to visit the suppliers that were added this year. TWG received an audit report from one of the suppliers and was able to meet with the agent of one the suppliers at the headquarters in Belgium. For the other supplier, everything was arranged through online meetings. Both suppliers were not completely new to TWG, TWG has worked with both suppliers in the past.

During the pandemic, TWG has kept itself informed about COVID-19 risks related to its sourcing countries through contact with its suppliers, attending FW webinars and by regularly checking the COVID-19 section on the FW website. The brand remained in regular contact with its suppliers and asked about the situation at the factory and whether support was needed. With its own production location in Turkey and the supplier in India contact was mainly through video calls. With its production locations in China this was more difficult and mainly by email. One of the main risks that TWG identified for all its suppliers was OHS issues, the most important one being that workers get infected with COVID-19 during work time. Another major risk that the brand identified was the impact of factory lockdowns on workers' wages. For its Turkish and Indian suppliers the brand could verify that there were no issues related to workers' wages during factory lockdowns. For its suppliers in China, the brand did not verify whether wages were paid during work stoppages.

Recommendation: If TWG receives an existing audit report it is advised to check the follow up status of the issues mentioned in the report. This can give an idea about the suppliers' commitment to remediate CAP findings.

TWG is advised to follow its procedure set up for new suppliers. This year, the member added two new suppliers but could only show a valid audit report for one of the suppliers. In case it is not possible to receive an audit report, TWG is advised to investigate alternative monitoring tools that can help with getting a good understanding of the situation in the factory.

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

Comment: TWG has a basic supplier evaluation overview that includes information about the relation with the factory and the overall score of the most recent audit. In 2020, the supplier evaluation has not led to production decisions. Suppliers are not informed about the evaluation. Generally it is difficult for TWG to reward well-performing suppliers as the strategy of TWG is to produce as much as possible at its own factory in Turkey. TWG only sources specific product groups that can't be produced in its own factory at other locations.

In 2020, TWG ended the relationship with two suppliers. With one of the suppliers, the cooperation ended because TWG's MOQ was too low for the factory. At the other supplier, the relationship was ended because of difficulties in communications and reoccurring problems with deliveries. TWG followed the Fair Wear policy on responsible exit strategy but has not created its own policy or integrated it in its sourcing strategy.

At the start of the pandemic, TWG had just received the new collection in-house and sent out its production orders. As a result, the company experienced some liquidity issues that was solved by asking suppliers for extended payment terms. TWG could demonstrate this was done in dialogue with the suppliers, the brand did not explicitly verify whether the extended payment terms resulted in difficulties with paying wages. TWG has not cancelled or reduced any of its planned orders.

Recommendation: TWG is encouraged to make more explicit how social compliance in the supplier rating system in which quality, relationship, price, and planning are assessed is weighted and how compliance with CoLP leads to production decisions. In addition, TWG is recommended to share the results of its evaluation system with its suppliers

Fair Wear encourages TWG to implement a responsible exit strategy and make sure all relevant staff is informed about this. Please see Fair Wear's guidelines on a responsible exit strategy.

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: TWG works with two seasons, autumn/winter and spring/summer. One month before the end of the sales period, all production locations receive a forecast order allowing them to plan ahead for these orders. The repetition of similar styles throughout the year adds to efficient working processes. Additionally, NOS-styles such as underwear are spread over the low season. Samples are always made in all colours because coloured fabrics can react differently when sewing. This makes it less likely for problems to come up during the actual production. TWG's customers are mostly B2B, they place orders based on these samples. Thanks to this set-up, a design changes rarely and technical changes are usually not needed during bulk production. Furthermore, TWG works with a forecasting system which looks at data from previous sales. Based on these statistics, it can accurately foresee and communicate significant changes in seasonal production orders with its suppliers upfront.

TWG and its main production facility in Turkey, where it produces 85% of its FOB, have a joint system in which they do the planning based on the sales forecasts. In this system, TWG has direct insight in the capacity of the factory. The expected dispatch date can directly be accessed by TWG's B2B customers once the factory inputs the information. All these elements contribute to TWG's system supporting regular hours of work. At the other facilities, TWG has less insight into the production capacity but its orders there are relatively small. As such, TWG considers that production capacity for its orders is not an issue.

TWG responded to production delays by choosing air-shipment. If needed, additional costs related to that were covered by the brand. Fabric delays at the Indian supplier were solved by not taking on GOTS certification on certain products.

Recommendation: Fair Wear would like to commend TWG on the shared production planning system that its has with its own factory and recommends TWG to expand its knowledge of the production capacity from its suppliers. To do that, Fair Wear recommends TWG to learn more about the standard minute per style and how the production of its products impacts the total production capacity of the factory.

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

Comment: In the 2019 audit at TWG's own production facility in Turkey, excessive overtime was identified. In 2020, The factory was able to remediate the overtime by re-programming the personnel schedule.

In China, excessive overtime is a common finding and this was also found at suppliers producing for TWG. The main root-causes identified by TWG are: expensive machinery that should operate as many hours as possible for a higher return on investment and workers making excessive overtime to earn more salary. So far, TWG has not been able to remediate OT that occurs at its Chinese factories. In China, TWG works with big factories and in most cases the company only takes up a small share of the production capacity. Therefore, TWG finds it difficult to remediate this issue.

Recommendation: FW recommends TWG to explore whether it can minimise its own influence on excessive overtime by more long-term forecasting and placement of NOS orders during low-peak season, especially at its Chinese factories. At factories where the company takes on a small share of the total production capacity, collaboration can be sought with other buyers to increase leverage. In addition, TWG should be aware that excessive overtime and wages are issues that are interlinked, working towards payment of living wages can contribute to solving excessive overtime as well.

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

Comment: In 2020, the topic of living wage was focused on TWG's own production facility in Turkey. TWG has worked on creating more transparency between TWG and the factory in terms of pricing and cost breakdowns. For this factory, TWG is now aware of the labour minutes that go into a style and knows the wage levels in the factory. The next step is to link the prices paid by TWG to wages levels in the factory and to calculate the cost-breakdown per article(group). TWG has also joined the Fair Wear living wage incubator 2.0 which has helped the brand to expand its knowledge on this topic.

With its other production locations, TWG has not started on this topic of living wage yet. It is TWG's policy not to negotiate on prices with its suppliers, it usually accepts the price given by the supplier gives and trusts that the supplier will request a price that can cover the wages. In case TWG does find the price too high, it would search for a different quality of fabric. In cases where the MOQ is too low for the factory, TWG is willing to pay an additional fee.

TWG has not learned about additional costs incurred by its factories due to COVID-19. The company expects that these additional costs will lead to higher prices during the next purchasing season.

Requirement: Considering that TWG is owned by its supplier, the member should be able to demonstrate the link between its pricing and the wage levels at the supplier. Moreover, the member should engage in a dialogue with its suppliers about the additional costs due to COVID-19, the effect on wages, etc. and take steps to incorporate these additional costs into the prices.

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

Comment: There were no cases found where legal minimum wages were not paid.

Through an audit in fall 2020 at its Indian supplier, TWG was able to verify that wages were continued to be paid during lockdown periods. At its own supplier in Turkey, workers that were sent on unpaid leave were partly paid through government subsidies and the factory paid for the other share. For its factories in China, TWG did not verify whether the LMW was paid during lockdown periods even though the risk of that happening in China was considerably high.

Requirement: During COVID-19 the member is expected to thoroughly check with all its suppliers whether they foresee any issues with payment of wages.

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: TWG pays 30% in advance to its suppliers in India and China, the rest is paid upon delivery. The orders will only be released by customs in Belgium once they are fully paid. Proof of full payment has to be shown at customs. There are no findings of late payment from TWG.

As also discussed under indicator 1.5 TWG did experience some liquidity issues at the start of the pandemic and, as a response to that TWG has asked its suppliers to extend the payment terms from 30 % advanced payment to 100 % upon arrival. TWG could demonstrate this was done in dialogue with the suppliers and the original payment terms were restored in the next purchasing season.

For its Turkish supplier, as the CEO of the factory is also TWG's CEO, payments are always done on time upon request of the CEO.

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: As described under indicator 1.8, TWG has focused its efforts in regards to the topic of living wage on its own factory in Turkey, which represents 85 % of the companies' FOB. In 2020, TWG and the factory have worked on creating more transparency on wages and TWG received insight into the wage levels at the factory. TWG has not investigated what the root causes for payment below living wage are.

The company has verified that COVID-19 has not resulted in lower paid wages at its factory in Turkey and India. For the factories in China it was not able to verify.

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

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).	85%	Owning a supplier increases the accountability and reduces the risk of unexpected CoLP violations. Given these advantages, this is a bonus indicator. Extra points are possible, but the indicator will not negatively affect an member company's score.	Supplier information provided by member company.	2	2	0

Comment: TWG and its main factory are both owned by the CEO of the factory, Mehmet Batur. TWG sources as much as possible from this location (85% in 2020).

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 2020, TWG has defined a target wage of 4592 Lira. TWG and its Turkish supplier have not defined how they are going to increase wages or how to finance the increase. For the upcoming year, TWG is planning to send out a worker questionnaire to get more insight about the opinion of workers on wages levels in the factory.

From an audit report at its Indian factory, TWG learned that another Fair Wear member sourcing there is paying a contribution towards living wage. So far, TWG has not taken the opportunity to discuss the potential collaboration with the other member.

Requirement: Since TWG owns a production location, the member company has full influence over the wages and should be able to cost for a living wage.

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.	85%	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.	6	6	0

Comment: As described at indicator 1.11, in 2020, TWG has been able to get full insight into the wage levels at its factory in Turkey. From the wage analyses and proof of payslips. Although TWG does not have clear insight in the way its prices relate to the wages in the factory, it could be verified during the performance check that the target wage, the trade union estimate - cost of living for a single worker, was met for all workers in the factory.

The lowest paid wage is about 40 % of the target wage, the trade union estimate - cost of living for a family of four.

Recommendation: TWG should note that reaching a target wage, while a good achievement, does not equal the payment of a living wage. The coming financial year, TWG should make a time-bound plan to continue climbing the ladder, by selecting a next target wage, for example the trade union estimate for a family of four. It is advised to involve worker representation as much as possible in the process.

Purchasing Practices

Possible Points: 52

Earned Points: 37

2. Monitoring and Remediation

Basic measurements	Result	Comments
% of production volume where an audit took place.	92%	
% 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.	N/A	
Total monitoring threshold:	92%	Measured as percentage of production volume (Minimums: 1 year: 40%; 2 years 60%; 3 years+: 80-100%)

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

Comment: The CSR manager is responsible for CAP follow-up at all suppliers. Since 2020, a new Marketing and Communication manager was hired in Turkey. The Marketing and Communication manager speaks both Turkish and English fluently and supports the CSR manager with CAP follow up and other CSR activities at the factory. It is felt that she is of great support to the CSR manager and that TWG and the factory were able to enhance the collaboration on CAPS.

For the CAP Follow up at other suppliers, the CSR manager is supported by an external CSR consultant.

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: During 2020, the CSR manager and the Marketing and Communication manager in Turkey have set up a solid system for the CAP follow up at the Turkish supplier. Based on the priorities indicated in the CAP, the findings are categorised in three groups according to required time-lines in which it should be resolved. The Marketing and Communication manager follows up on the CAPS directly with factory management, discusses the status on a monthly basis with the CSR manager and if needed top management is also involved. When necessary, worker representatives are also involved and can give suggestions of possible solutions.

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: With the arrival of the Marketing and Communication manager, TWG has focused on setting up a monitoring system for CAP findings in Turkey. The company could demonstrate that it has set up a solid system in which the Marketing and Communication manager is in direct contact with the factory and translates the progress made on CAP findings to the CSR manager on a regular basis. TWG could show progress on several CAP findings from the audit report of 2019. For example: a comment box for worker feedback was installed, overtime hours were reduced and the factory has started to develop a child labour policy. Some findings that require significant financial investment have not been solved, such as the installation of a ventilation system.

TWG has also identified issues related to COVID-19 via brand-supplier dialogue. For example, at the Turkish factory an in-house children daycare was installed upon request of the workers. Moreover the finger print system that registered working hours was replaced by an eye-recognition system to diminish contact points in the factory that could increase the risk of the spread of COVID-19 in the factory.

For its factory in India, TWG is not much involved in the CAP follow up as that is mainly executed by the other sourcing member. For its factories in China, TWG started with requesting available audit reports and the CSR manager is supported by an external consultant with the CAP follow up. Some first steps were made in starting a dialogue with factory management on CAPs related to overtime.

Recommendation: Fair Wear encourages TWG to continue strengthening its monitoring system and to analyse how it might have contributed to findings and what changes it can make in its own purchasing practices. Especially for its other factories in India and China. In cases when audits are not possible or reports only provide limited information, the company should search for alternative methods to acquire more information on working conditions. Furthermore, TWG is advised to seek active collaboration with the other member sourcing at the Indian factory.

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	0

Comment: As travel was restricted due to the COVID-19, this indicator is not applicable in 2020 for all Fair Wear members.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.6 Existing audit reports from other sources are collected.	Yes and quality assessed	Existing reports form a basis for understanding the issues and strengths of a supplier, and reduces duplicative work.	Audit reports are on file; evidence of followup on prior CAPs. Reports of quality assessments.	2	3	0

Comment: TWG asks for existing audit reports from other sources at its suppliers and has used the FW quality assessment tool for external audits to check on the quality of the report. TWG has made a first step towards remediating the issue of excessive overtime at its Chinese suppliers by discussing it over mail and with the support of its agents. TWG orders small volumes at several big factories in China which makes it more difficult for TWG to start the discussion and convince the supplier to remediate CAP findings.

Recommendation: Fair Wear recommends TWG to collect external audit reports from factories where they have considerable leverage (10 % and more)

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

Comment: TWG's own factory is in Turkey and TWG is well aware of the risks related to fashion production in this country. Already in the first year of membership, TWG had made a risk assessment and drafted a policy for the employment of Syrian refugees. The factory management knows how to support such workers in the process of obtaining a working permit. Furthermore, the factory has system in place to do a thorough documents check for new employees. TWG supplier checklist includes questions regarding migrant workers as well. The factory has not made use of subcontractors in 2020. In addition, TWG has identified the risk of child-labour in Turkey. The factory is still in the process of setting up a policy for that.

TWG sources from Tamil Nadu, India, which is known for risks relating to the Sumangali scheme. TWG is aware of this risk, they have attended webinars and read the FW country study. In 2020, TWG has identified which spinning mills are used by its factory and those could not be linked to practices related to the Sumangali scheme. Moreover, its production location was audited in 2020 and from the audit results it could be concluded that this practise is not present in the factory. Another general risk for India is gender based violence. In 2020, TWG decided to organise a WEP violence and harassment prevention at its factory in India to mitigate this risk. The training has taken place in 2021, appreciation and follow up of the training will be evaluated in next year's brand performance check.

The third sourcing country from TWG is China. In China, TWG has identified risks related to forced labour. It has started to discuss the risk with its suppliers by mail; however, from the first reaction of suppliers the CSR manager concluded that the topic is too sensitive to discuss by email. It plans to discuss this further when visits are possible again. In 2021, TWG will join a follow up research that is done by Fair Wear on this topic.

In terms of risks related to the corona pandemic, TWG identified as main risk: workers falling ill due to the spread of COVID-19 in the factory. From one of its Chinese suppliers TWG received valuable advice on effective measures to prevent the spread of the virus within factories, such as having appropriate distance between workers and having disinfection tools at central locations in the factory. TWG has shared this information with its other suppliers by mail and checked whether the necessary measures were taken. For its own supplier in Turkey, TWG is well aware of the OHS measures that were taken. TWG did not make use of the FW Health & Safety COVID-19 discussion sheet or checklist.

The other risk identified by TWG was the loss of wages due to factory lockdowns. Generally TWG has supported its factories in this area by not reducing or cancelling any of its orders. For its own factory in Turkey, TWG could verify that the payment of wages to the workers continued during factory lockdown. For its Indian supplier, TWG could verify that the payment of wages was continued during factory lockdown through audit results. For its Chinese suppliers it has not verified whether wages were always paid during factory lockdowns.

Recommendation: The member is encouraged to take a more proactive approach in offering support to its suppliers and to make use the COVID-19 Factory Health and Safety Discussion Sheet and the COVID-19 Health and Safety Measures Checklist that FW made available and share these with its suppliers.

Factory Health and Safety Discussion Sheet

<https://api.fairwear.org/wp-content/uploads/2020/06/Discussion-Sheet-on-Health-and-Safety-Covid-19.pdf>"Covid-19

Factory Health and Safety Checklist

<https://api.fairwear.org/wp-content/uploads/2020/06/Checklist-Covid-19-Health-Safety-Measures.pdf>

We ask TWG to make a clear statement to its suppliers that, as a brand, it does not want to be involved with any forced labour in its supply chains, including subcontractors.

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: At the end of 2020, a FW audit has taken place at a factory where TWG produces together with another FW member. The other FW member has taken the lead in CAP follow up because it has more leverage. TWG was so far not informed about the latest status of CAP remediation.

Recommendation: Fair Wear strongly recommends TWG to document status of joint follow-up actions and to actively seek contact with the other FW member. Even though one brand commonly takes the lead it is important to be kept informed of the status in order to be aware of required implementation steps before communication with or visits to the factory.

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).	No	Fair Wear encourages its members to monitor 100% of its production locations and rewards those members who conduct full audits above the minimum required monitoring threshold.	Production location information as provided to Fair Wear and recent Audit Reports.	N/A	2	0

Comment: This Brand Performance Check is evaluating the second year of membership of TWG. As such, this indicator is not applicable.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.11 Questionnaire is sent and information is collected from external brands resold by the member company.	No external brands resold	Fair Wear believes it is important for affiliates that have a retail/wholesale arm to at least know if the brands they resell are members of Fair Wear or a similar organisation, and in which countries those brands produce goods.	Questionnaires are on file.	N/A	2	0

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.12 External brands resold by member companies that are members of another credible initiative (% of external sales volume).	No external brands resold	Fair Wear believes members who resell products should be rewarded for choosing to sell external brands who also take their supply chain responsibilities seriously and are open about in which countries they produce goods.	External production data in Fair Wear's information management system. Documentation of sales volumes of products made by Fair Wear or FLA members.	N/A	3	0

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.13 Questionnaire is sent and information is collected from licensees.	No licensees	Fair Wear believes it is important for member companies to know if the licensee is committed to the implementation of the same labour standards and has a monitoring system in place.	Questionnaires are on file. Contracts with licensees.	N/A	1	0

Monitoring and Remediation

Possible Points: 24

Earned Points: 19

Additional comments on Monitoring and Remediation :

The hiring of the Marketing and Communication manager in Turkey is considered of great added value. She supports the CSR manager in communication with the factory and with monitoring and improving working conditions at the factory. TWG noticed that the communication and cooperation between both companies has improved significantly due to that.

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: TWG's CSR manager is responsible for addressing worker complaints. For Turkey, the CSR manager is supported by the Marketing and Communication manager.

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: TWG has ensured that the Worker Information Sheet is posted in all its factories. In normal circumstances, the CSR manager would check during factory-visits if the WIS is still posted in the factory. For obvious reasons that was not possible in 2020.

Recommendation: It is suggested to ask production locations periodically to submit a photo of the posted Worker Information Sheet and to ask staff and or agents visiting a supplier to check if the documents are still posted as indicated on the obtained photo.

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

Comment: TWG had planned to organize a training at its factory in Turkey. Unfortunately, the spread of the corona virus did not allow for physical trainings to be organized. TWG was not aware of the worker awareness videos available for Turkey and India and has not distributed Worker Information Cards (WIC) to workers at its suppliers.

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

Recommendation: In countries where the corona pandemic does not allow for physical trainings, Fair Wear recommends TWG to spread worker awareness videos among workers. Fair Wear has created several worker videos, these can be found on the memberhub.

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

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

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

Complaints Handling

Possible Points: 9

Earned Points: 3

4. Training and Capacity Building

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.1 All staff at member company are made aware of FWF membership.	Yes	Preventing and remediating problems often requires the involvement of many different departments; making all staff aware of Fair Wear membership requirements helps to support cross-departmental collaboration when needed.	Emails, trainings, presentation, newsletters, etc.	1	1	0

Comment: In 2020, the CSR manager focused on involving the marketing, sales and customer service departments more in the subject of CSR. These departments are the link between the endconsumer and TWG's products. As such, they are in the position to convince buyers of the added value of CSR. At the same time, CSR can be used in sales argumentation. CSR has also become a recurring topic in the marketing communication of TWG. Furthermore, CSR and FW membership is discussed in regular management meetings at TWG.

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 involved in production that have regular direct contact with the suppliers are the CSR manager, the Collection Manager and the Marketing and Communication manager in Turkey. They are all directly involved in the Fair Wear membership and fully aware of all requirements. In addition, the CSR manager is supported by an external CSR consultant.

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: TWG works with two agents for two different factories. One of the agents was able to visit them in 2020. During the visit topics related to the FW membership were also discussed. The agents both have an active role in supporting the CSR manager with the implementation of the CoLP at the factories.

Recommendation: As the corona pandemic is likely to prevent travelling to production countries for some more time, Fair Wear recommends the member to actively train and involve their sourcing contractors/agents in CSR topics with suppliers. That way, they can serve as the eyes on the ground for TWG. TWG could consider asking the agent to fill out the factory checklist that was created last year.

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: TWG has not yet been able to implement training on transformative processes related to human rights. The corona pandemic did not allow for trainings to be organized in Turkey and TWG would like to start with a WEP Basic at the factory.

Recommendation: Fair Wear recommends TWG 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, TWG can make use of Fair Wear's WEP Factory dialogue 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.	Intermediate	Any improvements to supply chains require member companies to first know all of their production locations.	Supplier information provided by member company. Financial records of previous financial year. Documented efforts by member company to update supplier information from its monitoring activities.	3	6	-2

Comment: TWG has a relatively small supplier base and the vast majority of the production volume (85 %) is produced at its own supplier in Turkey. As TWG owns this factory it is easy to keep track if subcontracting is taking place (which is not the case). TWG works through agents with two production locations and with its other suppliers it works directly. At the start of a cooperation, TWG requests full transparency from its suppliers about, among other topics, production locations. However, this could be made more explicit. TWG has not included the topic of subcontracting in its business agreements. In normal circumstances, TWG checks whether any of their orders are subcontracted during visits to the production locations. This year that was not possible due to the corona pandemic. Generally, TWG considers the risk of subcontracting low at its production locations in China and India because of the relatively small order quantities from TWG.

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

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

Furthermore, TWG is advised to look into alternative ways to check on subcontracting while visiting factories is not possible. For example, it could consider to involving its agents or to do an extra check with the supplier before production starts.

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: CSR and other relevant staff such as the collection manager and the Marketing and Communication manager in Turkey, regularly share information about production locations. Whenever staff is visiting factories, relevant topics will be discussed upfront and evaluated after the visit. In 2019, a factory checklist was created for factory visits; unfortunately, TWG has not been able to use the checklist in practise because visits were not possible. With the Marketing and Communication manager joining TWG in 2020, discussing the outcome of the audit and follow up of CAPs has become easier.

Information Management

Possible Points: 7

Earned Points: 4

6. Transparency

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

Comment: TWG meets the Fair Wear communication requirements, is in line with the Fair Wear communication guideline and makes use of the FW on-garment communication.

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: TWG has published its Brand Performance Check of last year and the social report of the last two years on its website. TWG has signed the Fair Wear transparency policy and has disclosed factories for 100% through its social report. The brand has disclosed 95% of its FOB on the FW website and to other FW members through the FW portal, it is waiting for administrative approval of the last factories to disclose its entire supply chain. In addition, at the webshop of lordsxlilies (a brand of TWG) consumers can find the name of the production location per product.

Recommendation: Fair Wear recommends member brand to disclose 100% of production locations to other Fair Wear members in Fair Force and on 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: TWG wrote a detailed social report about its challenges and achievements over 2020. The report is published on its corporate website.

Transparency

Possible Points: 6

Earned Points: 5

7. Evaluation

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

Comment: Yearly after the Brand Performance Check, FW membership is evaluated with top management from Belgium and Turkey. That way, supplier feedback is automatically included in the evaluation. Also, the brand performance check results are used to create future plans and is used as input for the next work plan.

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.	74%	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: TWG was able work on most of the requirements for from last year's performance check, in total the brand received six requirements last year.

TWG made progress on the requirements of indicator 1.3, 1.4, 1.7 and 3.2, the brand made partial progress on the requirement at indicator 1.8.

TWG was not able to make progress on indicator 3.3, it should be acknowledged that the requirement on organising trainings at the factory to raise awareness about worker rights was more complex to follow up on, due to the spread of COVID-19.

Recommendation: Although the member was not able to execute all the requirements included in the previous performance check due to the corona pandemic, the member should resort to following up on these requirements when the situation allows.

Evaluation

Possible Points: 6

Earned Points: 6

Recommendations to Fair Wear

TWG recommends FW to give members more support in explaining complex CSR terminology and to make relevant information easier to find and to read. TWG now feels it sometimes misses out on information because it could not find it or it was discouraged by the lengthy documents. A solution could be to create a one-pager at the beginning of a policy document that explains the core of the policy.

Furthermore, TWG recommends FW to have more consideration for the nature of doing business at small to medium sized companies, which is usually less formal. Although policies are in place in practice they are often not in writing.

Scoring Overview

Category	Earned	Possible
Purchasing Practices	37	52
Monitoring and Remediation	19	24
Complaints Handling	3	9
Training and Capacity Building	5	11
Information Management	4	7
Transparency	5	6
Evaluation	6	6
Totals:	79	115

Benchmarking Score (earned points divided by possible points)

69

Performance Benchmarking Category

Good

Brand Performance Check details

Date of Brand Performance Check:

11-05-2021

Conducted by:

Annemiek Smits

Interviews with:

Nelle Matthys - CSR manager

Saartje Boutsen - External CSR consultant

İrem Gultan - Marketing & and Communication manager

Cathy de Rooij - Marketing Manager

Mehmet Batur - CEO

Steven van de Velde - Managing Director