



Brand Performance Check

ROOTS for Safety B.V.

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

ROOTS for Safety B.V.

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

Member company information	
Headquarters:	Hoogvliet , Netherlands
Member since:	2013-06-30
Product types:	Workwear; Footwear
Production in countries where Fair Wear is active:	China, Romania, Tunisia
Production in other countries:	Germany, Italy, Poland
Basic requirements	
Workplan and projected production location data for upcoming year have been submitted?	Yes
Actual production location data for evaluation period was submitted?	Yes
Membership fee has been paid?	Yes
Scoring overview	
% of own production under monitoring	97%
Benchmarking score	51
Category	Good

Summary:

ROOTS for Safety has met most of Fair Wear's performance requirements. The member brand's total benchmarking score of 51 means it has been placed in the 'good' category. ROOTS for Safety surpasses Fair Wear's monitoring threshold for members after three years of membership by monitoring 97% of production.

Corona Addendum:

ROOTS for Safety did not experience great difficulties due to the COVID-19 pandemic. The company experienced a decrease in sales in the beginning of the pandemic when the situation was very unsure and when some of its customers (factories in Europe) had to temporarily close. None of ROOTS for Safety's staff had reduced working hours.

ROOTS for Safety did not take a very proactive approach in its human rights due diligence and the negative effects of COVID-19 in its supply chain. While ROOTS for Safety did have discussions with its main supplier in China about the risk of job losses and the importance of paying wages, it did not verify that workers were paid during the factory's closure. Nor did ROOTS for Safety adequately follow up on these points with its other suppliers. In terms of health and safety issues, ROOTS for Safety trusted its suppliers to adhere to government regulations, and in the case of its main supplier in China checked this during site visits, resumed two weeks after the factory reopened, but did not offer support or solutions in implementing these.

ROOTS for Safety remained in close contact with its main supplier in China throughout the pandemic. This was done both through regular contact online as in person, as the quality control team and the Production Manager in China were on the factory floor on a regular basis. With its other suppliers, ROOTS for Safety was also in regular contact but did not visit them. ROOTS for Safety conducted an audit at its main supplier in China at the end of 2020 but did not engage in any other monitoring activities during the pandemic.

In terms of its purchasing practices, ROOTS for Safety did not cancel any of its orders. Due to the decrease in sales at the beginning of the pandemic, ROOTS for Safety reduced its orders to its suppliers in Tunisia and Italy but this decrease was supplemented by increased orders from its mother company Trital Safety for products such as face masks. When its main supplier in China had to shut due to the outbreak of COVID-19, ROOTS for Safety continued paying a set amount every two weeks even when there was no production or shipping of orders. This gave financial stability for the supplier during a very uncertain time. ROOTS for Safety was told that the supplier continued paying its workers during this time but did not verify this. Because the company works with a stock-based system with its main supplier that provides constant work for a set number of workers, there was no production pressure when the factory reopened.

ROOTS for Safety had fewer insights into its other suppliers, which due to the low FOB figures and low leverage were seen as less of a priority. It is important for ROOTS for Safety to make sure that it also conducts thorough due diligence at these suppliers and know how they, and particularly the workers, have been impacted by COVID-19. It is especially important to know how the suppliers dealt with loss of jobs and wages and occupational health and safety.

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.	85%	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: ROOTS for Safety works with one main supplier in China which accounts for 85% of its total production volume. ROOTS for Safety is responsible for 15% of this supplier's 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.	1%	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: In 2020, 1% of ROOTS for Safety's production volume came from production locations where member company buys less than 2% of its total FOB.

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.	3%	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.	1	4	0

Comment: In 2020, 3% of ROOTS for Safety's production volume was bought from production locations where a business relationship has existed for at least five years. This is a sharp decrease from last year and came about when the previous supplier, who accounted for 89% of ROOTS for Safety's production volume, ended the business relationship.

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, ROOTS for Safety started working with one new production location in China, which also became its main supplier. The member company could show document proof that both questionnaire and Code of Labour Practices were signed before first bulk orders were placed.

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

Comment: ROOTS for Safety began sourcing from a new supplier in China in 2020. This was because its old supplier ended the business relationship unilaterally. The new supplier was suggested by the overarching organisation that both the old and new supplier fall under. Due to the technical nature of ROOTS for Safety's products, there are relatively few suppliers who have the expertise necessary to produce for ROOTS for Safety, which meant that there was limited choice for a new main supplier. As part of ROOTS for Safety's ISO certifications a matrix is used with various requirements to on-board a new supplier. These requirements include CSR conditions. ROOTS for Safety developed a written procedure in 2020 in terms of conducting human rights due diligence before placing an order at a new supplier.

In terms of conducting human rights due diligence at the new supplier, first the production manager in China visited the factory and Fair Wear's health and safety checklist was filled in. Next, samples were made to make sure that the products adhered to the necessary safety requirements. Finally the Fair Wear questionnaire was filled in and returned, and the Worker Information Sheet was posted. The final decision to source at the new supplier was made after this evaluation by the management team. The CSR manager provided input and has the right to block a supplier in case the visual inspection does not meet a minimum standard, which he did not use in this case. ROOTS for Safety's CSR manager arranges quarterly reminders to follow up on existing suppliers, including discussions of ongoing remediation processes. Under normal conditions, ROOTS for Safety would have conducted a Fair Wear audit at the new supplier as soon as possible, but this was delayed due to the outbreak of COVID-19. Instead, the Fair Wear audit and WEP training took place at the end of October. Between the placing of the first orders and the audit, ROOTS for Safety's quality control team was constantly in the factory and the production manager in China visited the factory every two weeks. In these checks and visits, ROOTS for Safety made sure that there was enough capacity for its orders and all required production processes could be delivered. This meant that risk of subcontracting at this supplier was small.

COVID-related due diligence:

ROOTS for Safety maintained close contact with its suppliers about the situation surrounding the COVID-19 pandemic. In terms of its main supplier, ROOTS for Safety's quality control team was constantly in its main supplier in China as soon as it opened and the production manager located in China visited at least every two weeks. Outside of this, ROOTS for Safety was in at least weekly contact with all its suppliers. However, ROOTS for safety did not conduct a risk analysis to check for which suppliers there were experiencing adverse impacts, nor did it dig deeper when its suppliers said that everything was okay. ROOTS for Safety was told by its suppliers that there were no issues related to wages and loss of jobs but ROOTS for Safety did not verify this, by for example, checking worker wage records. The company did not make use of any additional monitoring tools, risk assessments or Fair Wear's COVID-19 dossier. However, a regular monitoring audit was conducted at its main supplier in China in March 2020, which gave ROOTS for Safety insights into the consequences of the pandemic on this supplier. Despite of this, the pandemic continually leads to changing risks, which means that ROOTS for Safety should ensure that it conducts human rights due diligence for all its suppliers regularly.

ROOTS for Safety's main supplier is located near the epicentre of the COVID-19 outbreak. This meant that the factory remained closed for two months following the Chinese New Year. According to ROOTS for Safety, workers continued to receive payments throughout this time, which was verified by the Fair Wear audit conducted soon after the reopening of the factory. When the factory opened again, not all the workers returned but this coincided with one client exiting the factory, this meant that the production capacity of the factory remained in balance with the orders received. ROOTS for Safety's local quality control team and the production manager for China visited the factory on a regular basis as soon as the factory reopened. This helped the communication surrounding the impact of COVID-19 and making sure that the government's requirements, in terms of PPE and adequate distance between workers, were being adhered to. ROOTS for Safety's supplier in Tunisia had to close due to the pandemic in April. ROOTS for Safety did not conduct any additional human rights due diligence in its suppliers in Tunisia or Italy because these are suppliers used only for small orders and ROOTS for Safety prioritised its main supplier. However, it remains important that ROOTS for Safety also conducts human rights due diligence in its smaller suppliers and knows what the consequences of COVID-19 are for them, even continuing on in 2021.

Requirement: Members are required to conduct a risk assessment of the impact of COVID-19 on its suppliers, identifying the most urgent issues per supplier.

Recommendation: A risk analysis as part of the decision-making process of selecting new production locations is an important step to mitigate risk and prevent potential problems. Fair Wear recommends ROOTS for Safety B.V. to clearly define preventive actions for identified risks and connect them to sourcing decisions. This also includes strategies to tackle structural risks such as low wage levels in the country, limited freedom of association and restricted civil society that are beyond the brand's individual sphere of influence. Fair Wear advises to use information from Fair Wear country studies and wage ladders and use the Fair Wear Health and Safety guidelines.

ROOTS for Safety B.V. can use the CSR Risk Check (<https://www.mvorisicochecker.nl/en/risk-check>) to further assess the risks in (potential new) sourcing countries. For gender risk assessments, ROOTS for Safety B.V. can use the gender-toolkit that has fact-sheets per country, supplier checklists and a model policy on Sexual Harassment. ROOTS for Safety B.V. can cooperate with local stakeholders to further investigate the situation in China, particularly with regards to freedom of association. Fair Wear can offer information on local stakeholders.

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

Comment: The majority of ROOTS for Safety garments are produced at their main supplier in China. A production manager based in China is responsible for assessing quality compliance. The production manager works together with the CSR manager, based at the headquarters in the Netherlands. The CSR manager is responsible for the remainder of the suppliers. Each factory is individually evaluated based on total orders, partial delivery, delays, prices monitored, quality management system, quality of product and invoicing. Additionally, compliance with Code of Labour Practices is evaluated as part of the social and environmental standards assessment per supplier.

ROOTS for Safety maintains an overview in which production location compliance with the CoLP is recorded and evaluated. The company uses quarterly compliance checks to discuss commitment to the CoLP and ongoing issues at the factory. This information is saved an overview of suppliers' status. This overview helps to better monitor compliance with Code of Labour Practices, however it is not yet completed in a systematic way, and sometimes ad-hoc based on ongoing issues at factory. The evaluation outcomes do not formally influence ROOTS for Safety's production decisions yet.

Due to the COVID-19 outbreak, ROOTS for Safety's clients required fewer products than usual. This meant that ROOTS for Safety reduced its planned orders for most suppliers, excluding the main supplier located in China who works on a stock based system. However, ROOTS for Safety's mother company, Trital Safety, was able to compensate these reductions by placing orders for products related to the COVID-19 pandemic, such as facemasks, gloves and screens at the effected suppliers.

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

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

Comment: When ROOTS for Safety moved its production to its new main supplier in 2019, it took the opportunity to re-evaluate and strengthen its stock-based production planning system. ROOTS for Safety agreed with its supplier about the minimum target stock that should be stored in the factory, and that it shall provide a constant stream of production for 80 workers working full time on items produced for ROOTS for Safety. These products are to replenish the stock at the factory, enough for one year to 18 months, from which the orders are shipped. By working to replenish stock, there is an added degree of flexibility and production planning possible for the supplier. This helps to avoid peak seasons, and mitigates ROOTS for Safety's contribution to excessive overtime. This production planning system also meant that ROOTS for Safety and its main supplier were relatively resilient through the lockdown and temporary factory closure due to COVID-19.

ROOTS for Safety has taken big steps in 2020 in moving towards a production planning system based on forecasting. This creates a clear overview and makes it possible to take decisions based on the bigger picture. A new member of staff has been appointed to work with the new forecasting system and continuously monitor the stock and orders.

For the other suppliers, ROOTS for Safety works with a model of orders and lead time. The lead times are set in discussion with the suppliers and are based on how long the supplier states that it will need to complete the order. As these orders are also not linked to peak seasons, there is the possibility for the order to be produced when the supplier has the capacity to do so. This meant that ROOTS for Safety did not contribute to excessive production pressure, even after the temporary closure in its suppliers in Tunisia and Italy. Furthermore, ROOTS for Safety decreased its orders to Tunisia and Italy and this capacity was filled by its mother company Trital Safety. Lead times for these orders were also set with the suppliers.

Recommendation: Fair Wear recommends ROOTS for Safety 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: When starting business with the new main supplier in China, ROOTS for Safety took the opportunity to work with the new supplier to set up a production planning system based on a minimum stock level that supports the mitigation of excessive overtime. ROOTS for Safety agreed with the supplier to ensure that there is a consistent stream of orders to provide work for 80 workers. This has resulted in consistent high quality production as the workers know the products very well. It also enables flexibility for the supplier. ROOTS for Safety works with a minimum stock requirement, which means that when the stock drops below a certain number, a set number is ordered.

However, excessive overtime was still found in the audit conducted by Fair Wear in October 2020. While ROOTS for Safety was able to show that this was not due to its own production planning, it should engage in dialogue with the factory about reducing overtime in general.

Recommendation: ROOTS for Safety B.V. could discuss with factory management on the causes of excessive overtime and provide support to manage overtime. If necessary, ROOTS for Safety B.V. could hire local experts to analyse root cause of excessive overtime in cooperation with the supplier, using the Fair Wear Excessive Overtime guidance as a basis. Fair Wear could recommend qualified persons upon request.

Fair Wear recommends cooperating with other customers at the factory to increase leverage, when trying to mitigate excessive overtime hours.

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

Comment: Due to the change in main supplier and the COVID-19 pandemic, ROOTS for Safety did not take any steps in gaining insights into the cost breakdown per product. ROOTS for Safety did receive a wage list from the factory but did not analyse it. It is strongly advised to monitor the wage data and cross check it against the data in the Fair Wear audit report. ROOTS for Safety does not have insights into the price breakdown at its other suppliers. Such insights are important for taking steps to pa

ROOTS for Safety never asks for any discounts in prices and buying prices are stable.

ROOTS for Safety was not aware of any extra labour costs incurred due to the COVID-19 pandemic. The company continued to pay the factory a set amount twice per month, which is its usual method of payment to the factory, while the factory was closed.

Requirement: Roots for Safety B.V. needs to demonstrate an understanding of the link between buying prices and wage levels, to ensure their pricing allows for the payment of the legal minimum wage.

Recommendation: At a minimum, members are recommended to investigate wage levels in production countries, among others by making use of Fair Wear's Wage Ladder and country studies. As an advanced step, increased transparency in costing and productivity gives insight in the labour costs per product. This forms the basis for ensuring enough is paid to cover at least minimum wage and for making steps towards living wages.

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: Part of the minimum wage is legally entitled paid annual leaves and paid statutory holiday leaves, which the piece rate workers in ROOTS for Safety's main supplier did not receive. ROOTS for Safety received the audit report early December 2020 and was able to show in the CAP that they had discussed this issue with their supplier. Roots for Safety should make sure that the issue is resolved in the next financial year.

In terms of COVID-19, ROOTS for Safety discussed issues surrounding the payment of legal minimum wages with its suppliers but did not verify whether the workers received their wages. ROOTS for Safety's main supplier in China shut due to Chinese New Year and remained closed for two months due to the pandemic. Because of this, there was a high risk of workers not receiving their wages. During this time, ROOTS for Safety continued to pay a set amount on a two-weekly basis to ensure that the factory did not experience any financial difficulties. ROOTS for Safety did not verify that workers received their wages during this time. However, the audit that was conducted late March 2020 did verify that workers received wages during the factory closure. The wages workers received during this period were above the legal minimum wage but significantly lower than their usual wages.

In Tunisia factories were also required to close in spring. Here, factories could request governmental support to make up for lost wages but Fair Wear has found that this governmental allowance was only granted in a few cases. ROOTS did not know whether its Tunisian factories received this allowance or if the workers received their wages.

Recommendation: Fair Wear strongly recommends ROOTS for Safety B.V. to always verify whether legal minimum wage issues have actually been resolved in case factory management claims so. ROOTS for Safety B.V. 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.

It is also strongly recommended that ROOTS for Safety remains informed about the payment of wages in its other suppliers and verifies that the workers receive legal minimum wage at all times.

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: ROOTS for Safety pays a set amount twice per month to its main supplier and pays using the local currency, which means that the supplier faces fewer risks related to currency exchange. This creates stability for the supplier and was continued during the factory closure.

For its other suppliers, ROOTS for Safety works with a 60 days payment terms, which starts the moment the invoice is sent along with the products. In practice, ROOTS for Safety pays its invoices within 30 days.

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

Comment: ROOTS for Safety has not discussed living wages with its suppliers. Nor did ROOTS for Safety receive a cost breakdown for the wages of its main supplier. It is important to gain insights in the cost breakdown of garments in order to take steps towards the payment of a living wage. ROOTS for Safety staff working directly with the suppliers should understand the difference between a living wage and wages that adhere to or are better than the legal minimum wage.

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

Recommendation: ROOTS for Safety is strongly recommended to consult Fair Wear's Living Wage Toolkit.

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.	None	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach.	Evidence of how payment below living wage was addressed, such as: internal policy and strategy documents, reports, correspondence with factories, etc.	0	6	0

Comment: ROOTS for Safety did not take any steps towards wage increases in 2020. The start with a new supplier and the pandemic meant that the company did not prioritise work on living wages. However, ROOTS for Safety should fulfil the requirement in 2021.

Requirement: ROOTS for Safety B.V. should analyse what is needed to increase wages and develop a strategy to finance the costs of wage increases.

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.14 Percentage of production volume where the member company pays its share of the target wage.	0%	Fair Wear member companies are challenged to adopt approaches that absorb the extra costs of increasing wages.	Member company's own documentation, evidence of target wage implementation, such as wage reports, factory documentation, communication with factories, etc.	0	6	0

Comment: ROOTS for Safety has not set a target wage for their suppliers.

Requirement: ROOTS FOR Safety B.V. is expected to begin setting a target wage for its production locations.

Purchasing Practices

Possible Points: 52

Earned Points: 18

2. Monitoring and Remediation

Basic measurements	Result	Comments
% of production volume where an audit took place.	85%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.	12%	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:	97%	Measured as percentage of production volume (Minimums: 1 year: 40%; 2 years 60%; 3 years+: 80-100%)

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

Comment: The Corporate Social Responsibility (CSR) & Quality, Health, Safety, Environment (QHSE) Manager is ultimately responsible to follow up on problems identified by the monitoring system. In practice, the production manager based in China is responsible for following up directly with the main supplier on remediation.

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: The audit report and CAP was received by ROOTS for Safety at the beginning of December and shared with the factory later that month. The CAP was not shared with worker representation as they were not present in the factory.

ROOTS for Safety should work together with the factory to establish a detailed timeframe of following up on the more complex findings in the CAP.

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

Comment: ROOTS for Safety conducted a Fair Wear audit at their main supplier in China in 2020. As the audit report was shared with ROOTS for Safety in early December, the majority of the resolution of the CAP will take place in the next financial year, which means that it will be checked in the next Brand Performance Check. There were some issues that were resolved very quickly, such as the correct placement of fire extinguishers. Photographic evidence is collected of the remediation activities and is saved within the CAP.

The CAP was not shared with worker representation.

In 2020, it was important to make sure that issues and risks related to COVID-19 were followed up on. In its main supplier in China, ROOTS for Safety had a continuous presence from the moment the factory reopened through the QC team and the Production Manager in China. The Production Manager and the QC team were well aware of the health and safety risks related to COVID-19 and made sure, through visual inspections and discussions, that all OHS measures were carried out. Because of this presence, both before and after the factory's closure, ROOTS for Safety was able to compare number of workers and see first hand that job losses were not an issue. The factory furthermore does not have a dormitory as most of the workers live locally.

There are currently no active CAPS for ROOTS for Safety's suppliers in Italy and Tunisia. As ROOTS for Safety did not carry out any risk assessments or additional monitoring activities in these countries, it did not have clear insights into the issues its suppliers was dealing with surrounding COVID-19.

Recommendation: Fair Wear also recommends ROOTS for Safety B.V. to gradually ensure factories establish independent worker representation and involve these representatives in monitoring and remediation of findings. It is recommended that ROOTS for Safety reads the Fair Wear document of Freedom of Association in China.

For more complex issues, ROOTS for Safety should establish a detailed and realistic timeframe with the supplier for implementing the remediation activities. This means breaking down the remediation into manageable steps and placing these steps into the timeframes provided with the CAP.

Fair Wear recommends that ROOTS for Safety audits its other production locations, especially those located in non-low risk countries, such as its Tunisian and Italian suppliers.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.5 Percentage of production volume from production locations that have been visited by the member company in the previous financial year.	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: The main supplier in China and its subcontractor are regularly visited. These visits resumed as soon as it was possible after the lockdown in China. The suppliers based in Tunisia and Germany were not visited in 2020.

As travel was restricted due to the Covid-19 pandemic, 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.	No existing reports/all audits by FWF or FWF member company	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.	N/A	3	0

Comment: No existing audit reports were collected, as the suppliers indicated that none were available.

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	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	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: COVID-19

ROOTS for Safety was aware of specific COVID-19 related risks and their remediation for its main supplier in China. The company knew that its main supplier lost a customer due to the pandemic but that this also coincided with a number of workers not returning to work after the Chinese New Year. To make sure that the main supplier did not experience financial problems, ROOTS for Safety carried on paying the standard two-weekly payment throughout the time the factory was closed and no production took place. However, ROOTS for Safety did not verify that the workers received their wages. As soon as the factory opened again, ROOTS for Safety's Production Manager in China visited the factory on a two-weekly basis and the quality control team was present every day. This meant that they were able to ensure that necessary health and safety measures were taken, such as sufficient distance between workers, facemasks and hand sanitation stations. As the factory is very new and not yet operating at full capacity, distance between workers was easily maintained by spreading them out throughout the factory. ROOTS for Safety discussed implementing the nationally required health and safety measures with factory management but did not support beyond that. The company did not involve worker representation in this process.

In terms of its other suppliers, ROOTS for Safety was only involved in a very basic way in ensuring COVID-19 issues were flagged and remediated. ROOTS for Safety was in contact with its suppliers and discussed issues during calls but was not proactively involved in finding and remediating COVID-19 related issues. ROOTS for Safety also did not follow up on health and safety requirements in these suppliers. While this was due to fact that ROOTS for Safety chose to focus its resources on its main supplier, it should be aware of risks and issues in its entire supply chain and remediate them.

China

As its main supplier is located in China, ROOTS for Safety acknowledges the risks that are inherent to producing there. Particularly regarding excessive overtime, freedom of association, Uyghur forced labour, issues around social insurances, and how the government exerts influence on factory decisions. ROOTS for Safety has asked its main supplier to sign a disclaimer that states it does not make use of Uyghur forced labour and was able to show this document. This is a highly sensitive topic and ROOTS for Safety is carefully considering how to follow up on this and has attended the Fair Wear session dedicated to this. ROOTS for Safety is very aware of issues surrounding migrant workers in China. When selecting its new main supplier, ROOTS for Safety made sure to select a supplier where the majority of the workers were from surrounding communities and go home at night. Furthermore, ROOTS for safety has set up its production planning in such a way that it tackles the risks associated with excessive overtime by supplying a continuous stream of employment for a set number of workers at the factory.

Tunisia and Italy

ROOTS for Safety is aware of the risks specific to its production in Europe and continues to discuss potential risks at suppliers during regular calls. ROOTS for Safety is aware of the general risks in Tunisia and discusses them in the recurring meetings. ROOTS for Safety is also aware of the general risks in Italy but is exiting its supplier there.

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

ROOTS for Safety should read the Fair Wear guidance on Freedom of Association in China and to make sure that all staff working with suppliers on the follow up of CAPs are aware of the contents of that document

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.8 Member company cooperates with other FWF member companies in resolving corrective actions at shared suppliers.	No CAPs active, no shared production locations or refusal of other company to cooperate	Cooperation between customers increases leverage and chances of successful outcomes. Cooperation also reduces the chances of a factory having to conduct multiple Corrective Action Plans about the same issue with multiple customers.	Shared CAPs, evidence of cooperation with other customers.	N/A	2	-1

Comment: Roots for Safety does not have any shared production locations with other Fair Wear members.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.9 Percentage of production volume where monitoring requirements for low-risk countries are fulfilled.	12%	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.	1	2	0

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

Comment: ROOTS for Safety fulfilled the monitoring requirements for its production volume in low-risk countries.

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

Requirement: N/A

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: 21

Earned Points: 12

3. Complaints Handling

Basic measurements	Result	Comments
Number of worker complaints received since last check.	1	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.	1	

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.1 A specific employee has been designated to address worker complaints.	Yes	Followup is a serious part of Fair Wear membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	1	1	-1

Comment: The CSR manager is responsible for addressing worker complaints and works closely with the Production Manager in China in following up on complaints.

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

Comment: For each of the suppliers an annual check is done to verify whether the posted Worker Information Sheet is (still) in place. This is done by local staff or by the CSR manager via email with photographic proof of posting.

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.	97%	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.	6	6	0

Comment: The main supplier in China participated in a WEP basic training in October 2020. In this training, 70% of factory management and 21% of workers participated.

Recommendation: ROOTS for Safety B.V. 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.	Yes	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.	3	6	-2

Comment: The complaint that ROOTS for Safety received occurred in the supplier that unilaterally ended the business relationship with ROOTS for Safety in 2019. Despite of this, ROOTS for Safety followed up on this complaint, which is in accordance with the Fair Wear complaints policy. ROOTS for Safety informed the supplier about the complaint and asked for a response. The supplier responded that it would take it up but, despite efforts from ROOTS for Safety, did not respond any further. The supplier was not open to any more communication with the brand about this complaint since the supplier themselves had ended the business relationship. The complaint was therefore closed.

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: 15

Earned Points: 12

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: Fair Wear membership is annually discussed with the management team. Information about Fair Wear is shared internally with all staff in meetings on an annual basis. General information is also shared with relevant colleagues to ensure that everyone is kept up to date.

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: The CSR manager has close contact with the production manager in China and they talk regularly about social compliance during their weekly meetings. The production manager in China usually makes one or two trips to the office in The Netherlands per year. In 2020 this was not possible due to the COVID-19 pandemic. For some more sensitive topics, such as the situation surrounding Uyghur minorities in China, the CSR manager informs the production manager in person at the office in the Netherlands.

For the suppliers in other countries, the CSR manager works closely with the Quality, Health, Safety and Environment Manager in the communication with suppliers.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices.	Member does not use agents/contractors	Agents have the potential to either support or disrupt CoLP implementation. It is the responsibility of member company to ensure agents actively support the implementation of the CoLP.	Correspondence with agents, trainings for agents, Fair Wear audit findings.	N/A	2	0

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.4 Factory participation in training programmes that support transformative processes related to human rights.	0%	Complex human rights issues such as freedom of association or gender-based violence require more in-depth trainings that support factory-level transformative processes. Fair Wear has developed several modules, however, other (member-led) programmes may also count.	Training reports, Fair Wear's data on factories enrolled in training programmes. For alternative training activities: curriculum, training content, participation and outcomes.	0	6	0

Comment: None of ROOTS for Safety's suppliers have participated in training programmes that support transformative processes.

Recommendation: Fair Wear recommends ROOTS for Safety 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, Trital Safety B.V. 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: 9

Earned Points: 3

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: ROOTS for Safety demonstrated efforts to identify and register all active production locations in the database for the financial year including their correct FOB percentages.

ROOTS for Safety has an agreement with its suppliers that subcontracting is not permitted unless otherwise discussed. The technical nature of the product means that ROOTS for Safety has strict follow up policies to make sure the product does not leave the factory, and assure the quality is consistent. ROOTS for Safety assumes that any change in quality in the product is an indicator of potential subcontracting, which has not yet happened.

The production manager in China does regular unannounced visits and uses the FWF audits to detect any subcontractors, which are then added to the supplier register.

For one supplier in Italy, the subcontractor's data is not known. Despite several attempts of ROOTS for Safety, this supplier refuses to share the address of its subcontractor in Romania. If ROOTS

Requirement: ROOTS needs to be aware of the exact locations of all its subcontractors and request that the Italian supplier shares the address.

If this requirement is not resolved in the next performance check, this indicator will score insufficient.

Recommendation: Fair Wear recommends ROOTS for Safety B.V. to take additional efforts to ensure that the brand is always informed beforehand about the placement of production at production locations. Furthermore, ROOTS for Safety B.V. could also agree with its main suppliers that only a pre-selected number of production locations can be used for production.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
5.2 CSR and other relevant staff actively share information with each other about working conditions at production locations.	Yes	CSR, purchasing and other staff who interact with suppliers need to be able to share information in order to establish a coherent and effective strategy for improvements.	Internal information system; status CAPs, reports of meetings of purchasing/CSR; systematic way of storing information.	1	1	-1

Comment: The CSR Manager shares Fair Wear updates with relevant staff at ROOTS for Safety, including Marketing, Purchasing and Sales teams. During their regular discussions, Fair Wear requirements are discussed with the Production manager based in China.

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: ROOTS for Safety meets the FWF Communications Policy both on its website as well as external communication via their main distributor catalogue of Trital Safety BV brand.

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: ROOTS for Safety publishes its Brand Performance Checks on its website. ROOTS for Safety also discloses its supplier list to other Fair Wear members 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: ROOTS for Safety publishes its social reports on its website.

Transparency

Possible Points: 6

Earned Points: 6

7. Evaluation

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

Comment: The CSR Manager discusses Fair Wear membership with top management on a regular basis. Top management is always informed about audit findings, remediation progress and WEP training outcomes, and regularly asks for updates. Top management continues to support Fair Wear membership, as it assists ROOTS for Safety with addressing social compliance issues in its supply chain. The brand performance check is shared with top management and follow up is discussed.

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.	1%	In each Brand Performance Check report, Fair Wear may include requirements for changes to management practices. Progress on achieving these requirements is an important part of Fair Wear membership and its process approach.	Member company should show documentation related to the specific requirements made in the previous Brand Performance Check.	2	4	-2

Comment: ROOTS for Safety received seven requirements last year, most of these were about excessive overtime, living wage and CAP follow up. Due to the change to a new supplier, ROOTS for Safety made significant efforts to alleviate the causes of excessive overtime. However, insufficient efforts were made regarding the living wage requirements. ROOTS for safety is strongly recommended to start working towards meeting these requirements.

Requirement: It is required to work towards remediation of previous requirements from the last Brand Performance Check. Further engagement needs to be taken with regard to the following requirements mentioned in the last Brand Performance Check.

Evaluation

Possible Points: 6

Earned Points: 4

Recommendations to Fair Wear

Scoring Overview

Category	Earned	Possible
Purchasing Practices	18	52
Monitoring and Remediation	12	21
Complaints Handling	12	15
Training and Capacity Building	3	9
Information Management	4	7
Transparency	6	6
Evaluation	4	6
Totals:	59	116

Benchmarking Score (earned points divided by possible points)

51

Performance Benchmarking Category

Good

Brand Performance Check details

Date of Brand Performance Check:

03-05-2021

Conducted by:

Liselotte Goemans

Interviews with:

Marco Kremers - QHSE & CSR Manager, Account Manager

Theo de Vliegh - CEO

Jan Pierre Tabruyn - Production Manager China

Paul van der Stap - Stock Analyst Manager