



Brand Performance Check

Bel&Bo-Fabrimode NV

This report covers the evaluation period 01-02-2020 to 31-01-2021

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

Bel&Bo-Fabrimode NV

Evaluation Period: 01-02-2020 to 31-01-2021

Member company information	
Headquarters:	Deerlijk , Belgium
Member since:	2021-11-30
Product types:	Garments, clothing, fashion apparel
Production in countries where Fair Wear is active:	Bangladesh, China, India, Romania, Tunisia, Turkey
Production in other countries:	Hong Kong Special Administrative Region (China), France, Italy, Malaysia, Morocco, Pakistan, Poland, Taiwan
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	94%
Benchmarking score	56
Category	Good

Summary:

Bel & Bo-Fabrimode NV (hereafter Bel & Bo) has shown progress and met most of Fair Wear's performance requirements. Bel&Bo has monitored 94% of its total production volume. The brand received a benchmarking score of 56. This places Bel & Bo in the 'Good' category.

Corona Addendum:

During the pandemic in 2020, Bel & Bo had to close shops for about two months in Europe due to lockdowns. During the lockdowns, most staff were put on technical unemployment for most days of the week, while leaving a minimum of staff members to monitor priority issues. After that period, the CSR staff was able to work from home and maintain contact with the suppliers.

Bel & Bo prioritised the relationships with their suppliers over short-term profit. Bel & Bo could demonstrate that no order was cancelled due to the drop in sales, and there was no delay of payments. When sales went down, Bel & Bo kept the excess products for the next year. To help suppliers during their lockdowns, Bel & Bo provided flexibility in lead time. Bel & Bo conducted online meetings with the top 25 direct suppliers to identify their needs of support and risks of labour rights violations. The interviews focused on three topics: orders (feedback on purchasing practice), health & safety, wage payments. All suppliers said that they appreciated Bel & Bo's concern, and there was no major issue on their end.

Although suppliers did not inform Bel & Bo on their issues, Bel & Bo had gained information from workers. This could be the result of Bel & Bo's effort to promote the Fair Wear complaints helpline in the last years. In 2020, Bel & Bo received seven worker complaints relevant to COVID-19. Bel & Bo has reacted immediately and worked with the suppliers and another Fair Wear member to resolve the complaints.

Bel & Bo could not continue its project on living wages, as the factories needed more space to deal with the pandemic.

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.	41%	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.	2	4	0

Comment: Bel & Bo has further consolidated its supplier base. The percentage of the production volume from production locations where it buys at least 10% of production capacity is 41% in 2020, compared to 29% in 2019.

Recommendation: Fair Wear encourages Bel&Bo to continue consolidating its supplier base.

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.	44%	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.	0	4	0

Comment: The percentage of production in tail-end suppliers has gradually decreased in the last few years, from 68% in 2017, 62% and in 2018, 52% in 2019 and 44% in 2020.

Recommendation: Fair Wear encourages Bel&Bo-Fabrimode NV to continuously consolidate its supply base by limiting the number of production locations in its tail-end.

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.	72%	Stable business relationships support most aspects of the Code of Labour Practices, and give production locations a reason to invest in improving working conditions.	Supplier information provided by member company.	3	4	0

Comment: Bel&Bo is making steady improvements in stabilising its relationships with its suppliers. In 2020, the percentage of the production volume from production locations where a business relationship has existed for at least five years is 72%, 10 percentage points higher than in 2019.

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: Bel & Bo has 25 new suppliers in 2020. All of them are indirect suppliers through intermediaries. Fair Wear has sampled 5 factories and verified that the new suppliers have signed and returned the questionnaires.

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

Comment: Bel & Bo works with direct suppliers and with indirect suppliers through intermediaries.

For direct new suppliers, Bel & Bo staff visit the factories before making decisions. For indirect new suppliers, the agents recommend potential suppliers, while Bel & Bo assess the working conditions through documentation submitted by the potential suppliers. The required documents include the suppliers' self-evaluation reports, the commitment to Fair Wear requirements (the questionnaire and the Code of Labour Practices), audit reports if available, agreement to join the Bangladesh Accord if the factory is in Bangladesh.

The CSR department can track all the records and communicate with the production department frequently. An order can only be placed, when the potential supplier meets all the requirements to submit working condition information.

To mitigate the risk of COVID-19, Bel & Bo collected risk-related information using Fair Wear's COVID dossier, and use Fair Wear's supplier questionnaire as a basis to communicate with suppliers. Bel & Bo organised online meetings to interview the top 25 direct suppliers. These suppliers accounted for 70% of the total purchasing volume. These suppliers were chosen because Bel & Bo has higher leverage, and would be able to provide help if needed.

The interviews include three main topics, which were identified by Bel & Bo as most critical during the pandemic: purchasing practices, wage payment to workers, risk of health & safety. Bel & Bo asked the suppliers directly for their feedback on the brands' purchasing practices, order status and the factory's financial situation and possible government supports. At the same time, Bel & Bo checked with the suppliers if they were able to pay wages to the workers, especially the piece-rate workers. Bel & Bo also asked about the day-to-day hygiene practices of the factories to prevent the spread of coronavirus.

Recommendation: Bel & Bo can take another step forward to improve its risk analysis as part of the decision-making process. Besides collecting audit reports and checking documents, Bel & Bo is encouraged to continue this years' practice to talk to each individual suppliers to learn more about their perspectives.

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

Comment: Bel & Bo's sales volume was down significantly. Shops were closed for three months and partly open for a few weeks. Since Bel & Bo has online shops and a large warehouse, it could still manage the orders in progress. According to Bel & Bo, the company did not want to lose the working relationships with the suppliers. It prioritized making sure no orders were cancelled due to COVID-19, and ensuring on-time payment to the suppliers.

In 2020, Bel & Bo developed its own supplier rating tool based on learnings from another Fair Wear member. For direct suppliers, the rating tool includes four main indicators - quality control, logistics, sourcing and CSR (corporate social responsibility). For indirect suppliers, Bel & Bo rates the intermediaries based on five indicators. The extra indicator is a ratio that reflects the degree of consolidation of production locations within the intermediary.

Bel & Bo does not yet reward suppliers' performance with financial rewards. It praises the suppliers and maintains long-term relationships with them.

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.6 The member company's production planning systems support reasonable working hours.	General or ad-hoc system.	Member company production planning systems can have a significant impact on the levels of excessive overtime at production locations.	Documentation of robust planning systems.	2	4	0

Comment: Bel & Bo shared annual production plans with all suppliers in advance. There is a staff member to frequently update production information at the suppliers. Bel & Bo did not use standard production minutes per style to calculate the required production time.

Due to the pandemic lockdown, Bel & Bo had a significant drop in sales. According to Bel & Bo, no confirmed orders were cancelled to deal with the drop in sales. Bel & Bo wanted to maintain long-term relationships with the suppliers and support them as partners. To help the suppliers, Bel & Bo accepted the orders in 2020 and sold them in 2021. In addition, Bel & Bo communicated biweekly with the suppliers on their capacities. Bel & Bo accepted late shipments and supported suppliers with air freight costs when necessary, in case of unexpected events such as lockdown, fabric delays or workforce issues.

Recommendation: Fair Wear recommends Bel&Bo to learn more about the standard minute per style and how its products' production impacts the factory's total production capacity.

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: Fair Wear audits found excessive overtime or inconsistent working hour records at most suppliers of Bel & Bo in the last two years. Bel & Bo had worked with a factory in Bangladesh to identify the root cause in 2019. Since no factory visit was possible, Bel & Bo did not do a root cause analysis of overtime at more factories.

Bel & Bo continued to make improvements at brand level to support the suppliers, such as working with a planner to provide better forecasting. During COVID-19, Bel & Bo maintained biweekly contacts with the direct suppliers (>70% of the FoB). Suppliers were encouraged to inform Bel & Bo when there were production problems that might cause overtime. Bel & Bo was flexible with the delivery times when the supplier reported issues.

Recommendation: Besides discussing with the supplier and assessing root causes, Fair Wear strongly recommends Bel&Bo actively take measures when excessive overtime is found. Taking measures to ensure that Bel&Bo knows and shows whether excessive overtime takes place at a supplier is key in resolving the issue. Measures such as regular checks by the local technician, documents checking and interviewing workers help assess whether excessive overtime takes place.

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: Bel & Bo had made progress towards understanding the concepts of labour costing through participating in Fair Wear workshops. Bel & Bo had also encouraged two of its more advanced partners to work with open costing. Due to COVID-19, the open-costing project was put on hold until the operations of the factories become more stable.

Bel & Bo is aware of the extra cost for suppliers to ensure worker wages and prevention of COVID-19. The CSR department of Bel & Bo conducted interviews with the majority of the suppliers. During the interviews, the suppliers were asked if they had trouble paying wages and how they carried out the preventive measures of COVID-19. In addition, the CSR department collected feedback from the suppliers on the sourcing practices of the production department. Most suppliers had given positive feedback and appreciated the support from Bel & Bo.

Requirement: Bel&Bo 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.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.9 Member company actively responds if production locations fail to pay legal minimum wages and/or fail to provide wage data to verify minimum wage is paid.	Yes	If a supplier fails to pay minimum wage or minimum wage payments cannot be verified, Fair Wear member companies are expected to hold management of the supplier accountable for respecting local labour law. Payment below minimum wage must be remediated urgently.	Complaint reports, CAPs, additional emails, Fair Wear Audit Reports or additional monitoring visits by a Fair Wear auditor, or other documents that show minimum wage issue is reported/resolved.	0	0	-2

Comment: Fair Wear audits in 2020 found that wage for downtime during COVID-19 was not paid to all workers at one factory located in China. Bel & Bo requested a remediation update from the factory at the beginning of 2021. The factory showed evidence that the factory had remediated and paid downtime according to legal requirements. Verification of the issue has not yet been completed.

Bel & Bo has conducted an interview with all main suppliers about the payment of wages and collected feedback on its sourcing practices. The factories appreciated the conversations, and none of them raised issues regarding the payment of wages during the downtime. At the same time, Bel & Bo continued to promote the Fair Wear Helpline among the workers at the suppliers. Bel & Bo received several complaint cases relevant to COVID-19. Bel & Bo reacted swiftly to find solutions to the issues.

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.10 Evidence of late payments to suppliers by member company.	No	Late payments to suppliers can have a negative impact on production locations and their ability to pay workers on time. Most garment workers have minimal savings, and even a brief delay in payments can cause serious problems.	Based on a complaint or audit report; review of production location and member company financial documents.	0	0	-1

Comment: Bel & Bo has not changed any payment terms for the suppliers. The CEO of Bel & Bo requested the production department to prioritise the relationships with the suppliers in the COVID time. Bel & Bo made sure the suppliers were paid in time just as before the pandemic. Bel & Bo also did not negotiate for lower prices, to show the suppliers that they were supported by the brand. In one instance, Bel & Bo had supported the supplier to pay for air shipment when there was a delay due to the lockdown.

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: Bel & Bo made progress towards assessing the root cause of wages lower than a living wage. Two suppliers have committed to paying living wages, although the project was put temporarily on hold due to the COVID-19 pandemics. (See 1.8)

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

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

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: Bel & Bo has not directly determined and financed any wage increase at the suppliers.

Requirement: In case Bel&Bo buys exclusively at a production location, the member company has full influence over the wages and should be able to cost for a living wage.

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: Bel & Bo has not yet paid its share of the target wage at a supplier.

Purchasing Practices

Possible Points: 52

Earned Points: 18

2. Monitoring and Remediation

Basic measurements	Result	Comments
% of production volume where an audit took place.	80%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.	9%	To be counted towards the monitoring threshold, FWF low-risk policy should be implemented. See indicator 2.9. (N/A = no production in low risk countries.)
Member meets monitoring requirements for tail-end production locations.	Yes	
Requirement(s) for next performance check		
Total monitoring threshold:	94%	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: There is a specific staff member designated to follow up on problems identified by the monitoring system.

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

Comment: Bel & Bo makes use of Fair Wear audits or external audits.

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: Bel & Bo has a system to share the Corrective Action Plans and audit reports with the factories within three months after an audit.

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: Due to the COVID-19 pandemic, Bel & Bo was not able to visit the factories. It maintained communication with most factories on remediating the findings of the audits. Bel & Bo has a system to store the CAPs and remediation data from all the suppliers. The suppliers were required to provide evidence of improvements based on the CAPs. For example, photos of the workplace, payslips of workers, and working hour records. The suppliers did not always respond to the questions on time.

Bel & Bo has conducted phone interviews at all direct suppliers regarding COVID-19 related issues, mainly factory closure time, wage payments and virus prevention measures. The suppliers were able to send photos and copies of payslips. Most payment records were in local languages and were sample documents. It was not possible to conclude that there was no violation.

Bel & Bo regularly checked with all direct suppliers to mitigate risks and encouraged them to report issues. Several suppliers raised problems such as low workforce capacity and material shortage. Bel & Bo adjusted delivery time accordingly to support these suppliers. One factory reported a fire, which caused no injury but a temporary factory closure. Bel & Bo extended the lead time for this supplier.

Recommendation: Followup CAPs based on email and phone communications is not always effective. To facilitate remediation, Bel&Bo could consider:

- Hiring a local consultant to assist factory in developing an action plan and to assist factory management in investigating root causes.
- Organising supplier seminars.
- Providing factory training.
- Sharing knowledge/material.
- Providing financial support to the supplier for implementing improvements.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.5 Percentage of production volume from production locations that have been visited by the member company in the previous financial year.	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: No visits in 2020 due to COVID -19. (Not required for 2020)

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

Comment: Bel & Bo requested existing audit reports from all factories as a regular practice. The report quality is accessed. The findings are followed up through emails (see 2.4). Bel & Bo has been quite active in requesting information from suppliers, but not all suppliers responded on time.

Recommendation: Fair Wear recommends Bel & Bo organising discussion sessions with suppliers where similar findings or risks are found. This will be more effective than merely relying on email communications.

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

Comment: Bangladesh:

Bel & Bo identified fire and building safety as high risk in Bangladesh. It has signed the Bangladesh Accord on Fire and Building Safety (hereafter: Accord). Bel & Bo works with all suppliers to implement changes required by the Accord. Excessive overtime and wage payment are also identified as high risks. Bel & Bo uses audits to monitor the situations and engages with key suppliers to discuss improvements towards living wages. In addition, the risk of gender-based violence is high. Bel & Bo and Fair Wear local team have set up and support anti-harassment committees.

Abrasive blasting:

Bel&Bo has a policy on abrasive blasting. All denim suppliers were visited in 2019 (not possible in 2020). All denim suppliers have signed agreements on not using abrasive blasting.

Turkey:

Around 4% of the total FoB came from Turkey in 2020. Bel & Bo has considered moving the productions from Turkey. Due to the pandemic, Bel & Bo could not visit the production locations and could not continue its plan to reduce risks. Bel & Bo has a general policy on discrimination. It has not developed specific systems to mitigate the risks of undocumented workers.

Other countries:

Bel & Bo purchases from 16 countries/regions. Bel & Bo uses Fair Wear country study and the MVO risk checker, as well as other research resources to identify risks. According to Bel & Bo, it has mitigated the following risks:

China: Bel & Bo concluded that the main risk is excessive overtime. Bel & Bo mitigates the risk through audits and visits of the local CSR staff.

India: Bel & Bo found that forced labour, harassment and social dialogue are among high risks in India. Besides audits, Bel & Bo advocates factories to join the Fair Wear Workplace Education Programme.

France: Bel & Bo found that small workshops in France often did not organise health and safety properly. Bel & Bo visited the suppliers in 2020 and discussed with the suppliers the importance of safety.

Tunisia: Bel & Bo worked with suppliers in Tunisia through intermediaries. It informed the intermediaries that it is important to stay with the same factories to ensure long term relationships.

Dealing with COVID -19 risks:

Bel & Bo has attended Fair Wear's workshops and studied the Fair Wear COVID dossier to learn about the risks. To identify specific risks per factory, Bel & Bo had made phone interviews with the majority of the suppliers. (See more details in 1.4.)

Recommendation: Bel & Bo should make sure that it meets the requirements in Fair Wear's Guidance on risks related to Turkish garment factories employing Syrian refugees. Bel & Bo could also make more effort in analysing and mitigating risks in other countries. For example, risks regarding forced labour and freedom of association are considered high in China. Bel & Bo could take additional measures to mitigate the risks.

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: Bel & Bo worked with other Fair Wear members to follow up on the corrective action plans of the Accord.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.9 Percentage of production volume where monitoring requirements for low-risk countries are fulfilled.	100%	Low-risk countries are determined by the presence and proper functioning of institutions which can guarantee compliance with national and international standards and laws. Fair Wear has defined minimum monitoring requirements for production locations in low-risk countries.	Documentation of visits, notification of suppliers of Fair Wear membership; posting of worker information sheets, completed questionnaires.	2	2	0

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

Comment: Bel & Bo meets all Fair Wear requirements to monitor working conditions at suppliers 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

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

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

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

Monitoring and Remediation

Possible Points: 26

Earned Points: 20

3. Complaints Handling

Basic measurements	Result	Comments
Number of worker complaints received since last check.	7	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.	7	
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: There is a specific employee responsible to handle worker complaints.

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

Comment: Bel & Bo has a system to ensure that the CoLP is posted. Bel & Bo uses Fair Wear audits to double check the results. When the audits found that the CoLP is not posted, Bel & Bo reacted swiftly and remediated the issue.

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.	32%	After informing workers and management of the Fair Wear CoLP and the complaints hotline, additional awareness raising and training is needed to ensure sustainable improvements and structural worker-management dialogue.	Training reports, Fair Wear's data on factories enrolled in the WEP basic module. For alternative training activities: curriculum, training content, participation and outcomes.	4	6	0

Comment: Bel & Bo had organised Fair Wear WEP training to raise awareness at the suppliers, which accounted for 32% of the total FoB.

Recommendation: Fair Wear recommends Bel&Bo to actively raise awareness about the Fair Wear Code of Labour Practices and Fair Wear complaint helpline among a larger portion of its suppliers. Bel&Bo should ensure good quality systematic training of workers and management on these topics. To this end, Bel&Bo can either use Fair Wear's WEP Basic module, or implement training related to the Fair Wear CoLP and complaint helpline through third-party training providers or brand staff. Non-Fair Wear training must follow the standards outlined in Fair Wear's guidance and checklist available on the Member Hub.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.4 All complaints received from production location workers are addressed in accordance with the FWF Complaints Procedure.	Yes	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: There were eight active complaints in 2020. One complaint was at a supplier in India. The complaint was received in 2019 and resolved in 2020. The complaint was relevant to wage, working hours and employment relationship.

The other seven complaints were from different workers of one factory located in Bangladesh. These were about various issues such as wages, health & safety, employment relationship. These issues were mostly due to outstanding payments to the workers in the time of COVID. The factory had reduced orders in the pandemic, and it did not pay all workers as legally required.

Bel & Bo sources through agents at this factory, and it has low leverage. Bel & Bo nevertheless had reacted timely upon receiving the complaints. It has also contacted another Fair Wear member sourcing from the same factory to collaborate on the complaints.

Bel & Bo is in the process of resolving all the complaints. Preventive steps have not yet been taken. More details of the complaints can be found on Fair Wear website.

Recommendation: It is recommended to uncover the root causes of complaints and prevent them from recurring.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.5 Cooperation with other customers in addressing worker complaints at shared suppliers.	Active cooperation	Because most production locations supply several customers with products, involvement of other customers by the Fair Wear member company can be critical in resolving a complaint at a supplier.	Documentation of joint efforts, e.g. emails, sharing of complaint data, etc.	2	2	0

Comment: Bel & Bo works with one Fair Wear member to deal with the complaints.

Complaints Handling

Possible Points: 17

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: All staff are aware of Fair Wear membership.

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: All staff in direct contact with suppliers are informed of Fair Wear requirements.

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: Agents of Bel & Bo are required to learn about Fair Wear and the Code of Labour Practices. Bel & Bo provided training to the agents about Fair Wear's approach. The agents regularly collect data about the follow-up on the corrective action plans. Discussion, negotiation and guidance are provided directly by Bel & Bo to the suppliers.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.4 Factory participation in training programmes that support transformative processes related to human rights.	23%	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.	2	6	0

Comment: Seven suppliers in Bangladesh and India have participated in Fair Wear's violence and harassment prevention programme. These suppliers accounted for 23% of the FoB. The training does not only increase awareness of worker rights, it encourages workers to establish internal processes to handle grievances on violence and harassment.

Recommendation: Fair Wear recommends Bel&Bo follow up on the initial training by establishing functional worker committees with a step-by-step approach and organise multiple follow-up sessions spread over several months and strengthen herewith internal grievance mechanisms. The training outline should have a worker-centred approach and focus on behavioural and structural change to improve working conditions for the long term, such as gender-based violence and worker-management dialogue. To this end, Bel&Bo 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

Comment: Bel & Bo has followed up training sessions for most factories in the violence prevention programme regularly before 2020. Due to COVID-19, Bel & Bo was not able to follow up on the training. Bel & Bo had maintained conversations with the suppliers and tried to help them in continuing business. At the same time, the Fair Wear training team was not able to provide follow-up sessions.

Training and Capacity Building

Possible Points: 11

Earned Points: 7

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: Bel & Bo is working with more than 100 suppliers. The majority of FoB (>70%) comes from direct suppliers. Bel & Bo works with intermediaries to source the remaining 30% FoB. Bel & Bo does not allow subcontracting. It had informed the intermediaries as well as all direct and indirect factories. All factories were required to fill in the Fair Wear questionnaire, commit to the Code of Labour Practices and agreed not to subcontract.

Bel & Bo used Fair Wear audits to check the practices in production locations. The audits found that some factories use external units for certain production processes, such as embroidery, printing and washing. The factories did not inform Bel & Bo about the practice. Bel & Bo had addressed the issues with the suppliers.

Recommendation: Fair Wear recommends Bel&Bo periodically checking with its suppliers whether all known production locations are still up to date and use the information to update supplier data, including subcontractors.

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

Comment: CSR and other relevant staff share information about working conditions at production locations.

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: Bel & Bo complies with Fair Wear's communication policy.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.2 Member company engages in advanced reporting activities.	Published Brand Performance Checks, audit reports, and/or other efforts lead to increased transparency.	Good reporting by members helps to ensure the transparency of Fair Wear's work and shares best practices with the industry.	Member company publishes one or more of the following on their website: Brand Performance Check, Audit Reports, Supplier List.	1	2	0

Comment: Bel&Bo has followed the Fair Wear transparency policy to share its supplier list with other members internal.

The social report and brand performance report have been published on Bel & Bo's website.

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

Comment: The social report has been submitted to Fair Wear and published on the 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: The CEO, management team and the CSR staff annually evaluate its performance on social sustainability based on Fair Wear's requirements.

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.	30%	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: The requirements in the last Brand Performance Check for Bel & Bo were mostly about living wages (1.8, 1.9, 1.11, 1.13 & 1.14). Bel & Bo has made partial improvements. Little improvement was made on indicator 2.4 regarding the policy to reduce risks in Turkey.

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	20	26
Complaints Handling	12	17
Training and Capacity Building	7	11
Information Management	4	7
Transparency	5	6
Evaluation	4	6
Totals:	70	125

Benchmarking Score (earned points divided by possible points)

56

Performance Benchmarking Category

Good

Brand Performance Check details

Date of Brand Performance Check:

01-06-2021

Conducted by:

Juliette Li

Interviews with:

Tine Buysens, CSR manager