



Brand Performance Check

Picture Organic Clothing

This report covers the evaluation period 01-04-2020 to 31-03-2021

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

Picture Organic Clothing

Evaluation Period: 01-04-2020 to 31-03-2021

Member company information	
Headquarters:	Gerzat , France
Member since:	2017-03-31
Product types:	Outdoor products; Sports & Activewear; Outdoorwear
Production in countries where Fair Wear is active:	China, India, Indonesia, Thailand, Turkey, Viet Nam
Production in other countries:	France, Mauritius, Portugal, 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	83%
Benchmarking score	52
Category	Good

Summary:

This performance check looks at Picture's financial year that started April 2020 and ended 31 March 2021. Picture Organic Clothing (hereafter Picture) has met most of Fair Wear's requirements. With a total benchmarking score of 52 points falls in the Good category. The company received an insufficient score on indicators 1.9, and 2.7 which means a repeated non-compliance. However, as the issues that got Picture an insufficient score last year were followed up, and due to the omission on Fair Wear's part to inform Picture about the repeated non-compliance, Fair Wear has used its discretionary power to place Picture into the category 'Good'. Picture has monitored 83% of its total FOB.

Corona Addendum:

As most garment brands, Picture was heavily impacted by the pandemic, and experienced a considerable decrease in sales. While shops were closed during the first lockdown, there was a small increase in online sales. During the two lockdowns, in total four months, employee's hours, including those of CSR, were reduced with one day a week.

At the start of the pandemic in 2020, management of Picture reached out to its suppliers to share updates about the situation at both sides and ensured orders would stay stable. This was not a systematic due diligence process that systematically identified risks for all suppliers. Though Picture knew of temporary factory closures, it mostly responded by adapting production planning, and did not identify these lockdowns as a huge risk for continued payment of legal minimum wages or layoffs.

Picture has not reduced or cancelled orders, and only one order at its main Chinese supplier was postponed. Picture also continued to pay orders according to its payment terms, without delay. It accepted longer delivery times, and where needed organised partial shipments.

While visits and audits were most of the time not possible, Picture did not use alternative monitoring options such as virtual video tours. Only in February 2021 Picture sent out a survey asking its suppliers about the impact of the pandemic on wages and how much capacity of the workforce was working. The survey also included questions about the implementation of health and safety measures. Only one factory sent some pictures with which Picture could verify some measures. The survey did not lead to a prioritisation of risks, and follow up of worrisome answers was negligible.

Compared to the previous performance check, Picture has taken some steps such as enrolling its main supplier in a WEP, making a start with a living wage strategy and creating a due diligence process that identifies country specific risks. However, the response to the pandemic still needs much to be improved.

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.	74%	Member companies with less than 10% of a production location's production capacity generally have limited influence on production location managers to make changes.	Supplier information provided by member company.	3	4	0

Comment: Picture has two main suppliers, one in China and one in Turkey. Combined, they are responsible for 74% of the production volume of Picture. In total, Picture produces garments at 20 suppliers. The tail end is relatively large because all suppliers are specialised in one product category.

Recommendation: Fair Wear recommends Picture to consolidate its supplier base where possible, and increase leverage at main production locations to effectively request improvements of working conditions. It is advised to describe the process of consolidation in a sourcing strategy that is agreed upon with top management/sourcing staff.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.1b Percentage of production volume from production locations where member company buys less than 2% of its total FOB.	7%	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: 7% of Picture's production volume comes from suppliers where the brand buys less than 2% of its total FOB. The brand is planning to assess the tail end to see where it can consolidate.

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.	77%	Stable business relationships support most aspects of the Code of Labour Practices, and give production locations a reason to invest in improving working conditions.	Supplier information provided by member company.	4	4	0

Comment: The brand has been working with its two main suppliers and their subcontractors for more than five years. Relations with the tailend suppliers have been started up in the last five years.

Recommendation: Fair Wear recommends Picture to consolidate its supply base by limiting the number of production locations in its 'tail end'. Shortening the tail will reduce the social compliance risks the member is exposed to and will allow the member to improve working conditions in a more efficient and effective way. When the tail end cannot be reduced further because of the production of certain garments, Fair Wear recommends Picture to increase its leverage by sourcing from factories where other Fair Wear members are active and/or increase human rights due diligence at new suppliers to ensure that factories with few issues are selected.

It is advised to describe the process of consolidation in a sourcing strategy that is agreed upon with top management/sourcing staff.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.3 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: Three new production locations were added in Indonesia, Portugal and China, and Picture has uploaded a signed questionnaire for them all. A Chinese supplier signed the questionnaire but edited the document and crossed out that auditors may interview workers outside the factory premises. Picture has not contacted the supplier about this as it is not planning to audit this supplier.

Recommendation: When receiving a questionnaire, Picture should check if the supplier agrees with all provided information, and if not, contact the location to discuss this and explain the FW methodology.

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: Picture's due diligence process identifies human rights issues in the country and potential risks in the local garment supply chain, based on FW country studies and reports from organisations like Human Rights Watch. The brand takes several factors into account when deciding on selecting new suppliers. It checks whether external audit reports are available and which other brands are sourcing from the factory. Picture favours factories where other Fair Wear members or sustainable garment brands source from, and approaches these clients for more information. The brand also checks if potential new suppliers have policies on sexual harassment and social dialogue. If these checks have been done, Picture send the supplier the questionnaire to sign and worker information sheet to be posted. Picture has not yet used the basic health and safety checklist that Fair Wear provides. The final decision whether to onboard a supplier is the result of a conversation between CSR and Purchasing. If CSR gives a clear No-Go, the supplier will not be added, though this is not written down in a document. These steps have all been followed for the the three new suppliers added in 2020. Picture could demonstrate it knows the risks in Indonesia and Mauritius, countries added in 2020 and 2019.

When the pandemic started in 2020, Picture's management reached out to its main suppliers asking in general about their situation and to share updates from both sides. Its main supplier collaborated with Picture to draft a new production planning. The main ambition was to provide stability of orders while not wasting previously ordered material, and for the suppliers to not dismiss any permanent workers.

Though there was weekly communication with the most important suppliers, there was no systematic identification of risks, and detailed questions about the effect of lockdowns and reduced orders on suppliers' ability to pay wages have not been asked. While Picture recognised the impact of temporary factory closures on production planning, it did not consider its risk on payment of workers during the lockdowns, and this has not been checked by the brand.

Only in February 2021, Picture started a more systematic approach of identifying the impact of the pandemic on its suppliers. It sent out a detailed survey to all suppliers, with questions ranging from change in orders and ability to keep wages to the same level, to percentage of workforce that is working and COVID-19 prevention measures that have been taken. The brand has not requested evidence in support of the answers, nor did it replace its usual monitoring with video calls or any other options.

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: When adding new suppliers, Picture could use the basic health and safety checklists that Fair Wear provides.

While good business relationships are important in working towards improved due diligence, it can also lead to brands not asking detailed questions or for verification, to not show mistrust. Therefore Fair Wear advises Picture to make it clear from the start that transparency is vital in its business relations, and that this means that at times verification can be asked.

It is recommended to put in writing that CSR can veto a new supplier.

Picture is advised to closely monitor the COVID-19 situation and its challenges. To help the conversation the member could use the ETI/FW brand/supplier conversation framework that is referred to in the ' Handbook COVID-19 lost wages and jobs'.

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.	No	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.	0	2	0

Comment: Picture does not have a general evaluation system that assesses suppliers' compliance to FWs CoLP.

During the pandemic Picture did not cancel or reduce any orders. The brand did postpone an order of 8000 pieces at its main Chinese supplier to the next year. The supplier had already bought the material, and these costs are not reimbursed yet by Picture, but will be covered once Picture pays the completed order.

Some suppliers have indicated in Picture's survey that they experienced a reduction of orders from other clients. The brand has not inquired whether that has led to any financial challenges, which could have resulted in inability to pay wages or dismissals of workers.

Requirement: A systematic evaluation approach is required to integrate social compliance into normal business processes, and supports good decision-making. The approach needs to ensure that Picture consistently evaluates the entire supplier base and includes information into decision-making procedures.

Recommendation: The evaluation system that Picture is required to set up can help the brand in conversations with suppliers about their progress related to other suppliers and to past performance.

Where suppliers experience liquidity problems, members are encouraged to offer their suppliers support, such as prepayment of materials or orders, or helping with border logistics.

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: Picture has two seasons a year; Spring-Summer (SS) and Fall-Winter (FW). It takes 1.5 years from the development of a new collection until the delivery of products.

The production of the SS items takes about 4.5 months, whereas the FW products demand 6 months because of their complexity. The orders are planned based on forecasting and divided in two or three drops, within a time frame of two months. This enables suppliers to produce in low season. In this way air freight can also be avoided. Internally, the brand agreed that the final order placement cannot be higher than the forecast that was given before. With its two main suppliers, the brand discusses delivery dates and plans back to when the final order needs to be confirmed. It has a stock in France where the products are sent.

The brand does not know the production capacity per month of its suppliers, and has not linked its order placement to the total size of production capacity. All suppliers request Picture to plan minimum orders quantities (MOQ), providing them more stability. Only in special cases Picture asks to order below the MOQ.

At its tail end suppliers, the brand discusses with the agent what low seasons are for the suppliers and what the best moment would be to place orders.

When delays happen at Picture's side, the brand accepts a later delivery date and communicates this to its clients. In response to factory closures and reduced capacity during the pandemic, Picture prioritised orders and made partial shipments and accepted production delays without conditions. When one supplier prioritised larger buyers with larger orders, the brand moved this order to its main supplier in China.

Recommendation: Fair Wear recommends Picture to learn more about the standard minute per style and how the production of its products impacts the total production capacity of the factory. When moving orders to another supplier, Fair Wear advises Picture to check when the order can be produced to prevent the need for excessive overtime.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.7 Degree to which member company mitigates root causes of excessive overtime.	No production problems /delays have been documented.	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.	N/A	6	0

Comment: A FW audit of March 2021 shows that Picture's main Chinese supplier falsified records. This verification audit was planned to follow up a 2019 audit that showed the same, though the supplier disputed the findings. After the 2019 audit Picture communicated about the importance of transparency and requested records that were sent to Fair Wear for checking. Since the 2021 report was received just two weeks before the end of Picture's financial year, this indicator is non applicable and follow up will be assessed in the next performance check.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.8 Member company can demonstrate the link between its buying prices and wage levels in production locations.	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: Picture negotiates prices through a top-down model. It defines the retail price per product and then calculates back to what the maximum price of the supplier can be. In case the supplier cannot meet the price, the brand discusses with the supplier how it can lower the costs by substituting zippers, pockets, etc.

The brand keeps an overview of the legal minimum wages and living wages per country. Although the brand knows the price of the fabric, it does not know the labour cost per product. Neither does it estimate how the prices of the suppliers are build up and whether its prices cover a legal minimum wage. When suppliers face increased costs, they will inform Picture why they cannot accept a requested price. The brand assumes they would do the same for costs incurred to implement COVID-19 measures.

Picture sent its main Chinese supplier the labour minute value calculator in February 2021, to gain more insight into the costing. However it has not been able to cooperate on this since it had to focus on the results of a FW audit conducted in March.

Requirement: Picture 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 wages.

The member should engage in a dialogue with the supplier about the additional costs due to COVID-19, the effect on wages, etc. and take steps to incorporate these additional costs into their prices.

Recommendation: Fair Wear recommends Picture to expand their knowledge of cost break downs of all product groups. Picture could at least calculate an estimation of the relationship between wages and their prices. Fair Wear advises the CSR and buying departments to share more information, so that staff involved in pricing is informed about increases in legal minimum wages in its production countries.

A next step would be to calculate the labour minute costs of its products to be able to calculate the exact costs of labour and link this to their own buying prices. Fair Wear's labour minute value and product costing calculator also enables suppliers to include any COVID-19 related costs. Priority would be to make sure this level of transparency can be achieved with its most important suppliers.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.9 Member company actively responds if production locations fail to pay legal minimum wages and/or fail to provide wage data to verify minimum wage is paid.	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: Last year Picture scored insufficient on this indicator as the 2019 audit at their main Chinese supplier showed falsification of wage records. The member followed up by asking the supplier to be transparent and by later in the year requesting wage slips. Picture discussed with Fair Wear about next steps and agreed to schedule a new audit in 2020. This audit, two weeks before the end of Picture's financial year, again showed falsification. However, as Picture responded to the 2019 audit findings, the 2021 audit results are not the deciding factor for the scoring of this indicator.

An existing audit report for Picture's new Indonesian supplier shows that management has reached an agreement with workers to pay wages lower than legal minimum wage. Picture has reached out to this supplier, and discussed the finding with another client, but since it is a complicated issue has not achieved progress.

During the pandemic the risk of non-payment of LMW was very high in the garment industry, as many factories needed to close temporarily and did not pay workers their wages. Not paying at least the full LMW can have severe consequences for workers. While Picture responded to factory lock downs by updating production planning, it did not check with suppliers if they continued to pay (legal minimum) wages. The main Chinese supplier informed Picture that they were able to keep all permanent staff and salaries of office workers did not change, but did not share if this was also the case for production workers.

Additionally, when in February 2021 a supplier responded in Picture's survey that it decreased wages by 10%, the brand did not check whether the paid wages would still be at least equal to LMW.

Requirement: Please note that following Fair Wear's policy for repeated non-compliance in Fair Wear's Brand Performance Checks, members that receive an insufficient or -2 score on this indicator for the second year in a row, will be placed in the 'Needs Improvement' category.

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

Recommendation: When confronted with more complex legal issues in audit reports, Picture is recommended to reach out to Fair Wear so that our local team may be able to assist.

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: There is no evidence of late payments and in the survey suppliers indicated that Picture still sent orders and payments on time. Picture pays within 30 days upon receiving the letter of credit and this has not changed during the pandemic.

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

Comment: After talking with Fair Wear and a FW member, Picture drafted a living wage strategy to start analysing the root causes of payment below legal minimum wage at its two main suppliers. Picture still needs to tackle some outstanding questions and action points, such as where the money for increased wages would come from. The brand has discussed raising wages with its main Chinese supplier but since problems with a FW audit has shifted its attention to that.

Recommendation: Picture is recommended to complete the outstanding questions defined in the living wage strategy, especially considering where the money for increased wages should come from. First challenge that needs to be tackled is the reluctance of the main Chinese supplier to share its bookkeeping, and ensure all workers in the factory receive the legal minimum wage.

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

Comment: Picture does not own any production locations.

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: The member has not set any target wage with its factories yet.

Requirement: Picture should analyse what is needed to increase wages and develop a plan to finance the costs of wage increases.

Recommendation: In determining what is needed and how wages should be increased, it is recommended to involve worker representation. It is advised that the plan to finance increased wages is approved and supported by top management.

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: As the member has not yet set a target wage, Picture could not show payment of its share of the target wage. According to Picture's main supplier in Turkey, it has some workers earning above a living wage benchmark. However only one payroll was sent in evidence, which was from an office employee. Because it is not verified that most (production)workers are earning a living wage, it cannot count for the indicator.

Recommendation: Fair Wear recommends Picture to verify the wage levels at the Turkish supplier with an audit. The brand is recommended to further develop its living wage strategy by setting target wages and start cooperating with its main suppliers to increase wages. The brand should calculate its share in paying target wages.

Purchasing Practices

Possible Points: 46

Earned Points: 20

2. Monitoring and Remediation

Basic measurements	Result	Comments
% of production volume where an audit took place.	82%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.	1%	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.	No (implementation will be assessed next performance check)	FWF members must meet tail-end monitoring requirements. Implementation will be assessed during next Brand Performance check.
Requirement(s) for next performance check	Picture has not conducted a basic health and safety check for its tail end locations as per the tail end requirements. During factory visits, labour conditions and the use of subcontractors must be discussed, outcomes of the discussion must be documented, and the Fair Wear health and safety checklist must be completed.	
Total monitoring threshold:	83%	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 sustainability manager and intern are responsible for following up on issues 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: Picture does not use an own auditing system.

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: Picture shared the audit results with its supplier in a timely manner, but has not involved worker representation.

Recommendation: Before an audit takes place, Picture is recommended to check with the supplier whether worker representatives are active. In this way, they can be involved from the start of an audit and be invited for the audit opening and exit meeting. Including workers when following up on audit reports gives them the opportunity to be informed of issues in the factory and have a voice in the prioritization of issues.

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.	Insufficient	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.	-2	8	-2

Comment: Picture keeps track of the suppliers' performance on improving working conditions in an excel overview. When improvements are made, this will be updated in the overview. Picture checks this overview monthly.

The external audit reports that Picture has for some suppliers showed some urgent findings - from inadequate age verification system to building safety and payment below legal minimum wage (see also 1.g). Despite their urgency these issues are still outstanding, and Picture could only show remediation for easier to solve problems.

As its main Chinese supplier disputed the FW audit findings on falsification of records, not much progress has been made on this CAP. However, since the 2021 audit report was only received two weeks before the closure of Picture's financial year, progress will be assessed in next performance check.

While in 2020 informal contact with suppliers about the impact of the pandemic did not lead to identification of risks, the survey that suppliers filled in in February 2021 showed some clear concerns. Three suppliers filled in they were working with zero, 25 or 50% capacity. Two suppliers responded that they did not receive payments (from other clients) on time. The main Turkish supplier did not check the box that it followed local government regulations. Two Chinese suppliers did not fill in anything about the health and safety measures they had taken. Picture sent a follow up mail asking if the suppliers had received governmental support. The brand did not get any responses, and therefore did not diligently follow up on the worrisome answers. Picture does not know if suppliers have been able to continue to pay out wages, or how many workers have been dismissed.

Requirement: Issues related to COVID-19 should not be considered solved without adequate verification.

Please note that following Fair Wear's policy for repeated non-compliance in Fair Wear's Brand Performance Checks, members that receive an insufficient or -2 score on this indicator for the second year in a row, will be placed in the 'Needs Improvement' category.

Recommendation: The feedback and supportive evidence that is sent by suppliers can be complex and difficult to interpret when unfamiliar with the local laws and expertise. Picture Organic Clothing can use Fair Wear's local team to verify the supportive evidence in case that is desirable.

COVID-19 related issues can be included in outstanding CAPs to facilitate monitoring.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.5 Percentage of production volume from production locations that have been visited by the member company in the previous financial year.	not applicable	Due to the Covid-19 pandemic, brands could often not visit their suppliers from March - December 2020. For consistency purposes, we therefore decided to score all our member brands N/A on visiting suppliers over the year 2020.	Member companies should document all production location visits with at least the date and name of the visitor.	N/A	4	0

Comment: As travel was restricted due to the COVID-19 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.	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: Picture creates CAPs for existing audit reports, and asks Fair Wear for help to assess the quality. Picture could only show remediation of basic findings (see indicator 2.4).

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

Comment: Turkey

Picture created and shared its policy on Syrian refugees employment with the main Turkish supplier in 2019 and in conversations stays updated about the local situation. The supplier also shared Picture's policy with its two subcontractors. Before the policy was shared, the subcontractors were visited by Picture. The external audit report did not contain detailed information on the hiring of Syrian refugees. The main supplier and its two subcontractors for printing and embroidery have not been audited yet. The brand did not provide training on hiring Syrian refugees to its suppliers. Picture does not have an agreement with its main supplier that it needs to be informed in advance when a new subcontractor is used.

Other Risks:

Picture has followed up last year's requirement and could demonstrate that it knows the country specific risks of the countries it sources from such as Indonesia and Mauritius. It has not yet acted on preventing or remediating these risks. Picture released a no-tolerance policy for forced labor in response to the issue of Uyghur labour in China and shared it with its suppliers. The Global Works research has not indicated any links to Picture's suppliers. The brand has asked its agent if Picture's suppliers have 2nd or 3rd tier suppliers located in Xinjiang with high risk of Uyghur labour, which was not the case.

Other risks: COVID

In 2020, the brand has read all guidance that Fair Wear published regarding COVID-19. However, it had undertaken too few efforts to analyse the risks that the pandemic posed to workers in its supply chain and prioritise follow up, see also indicator 1.4. In February 2021, the brand sent a survey to its suppliers. Its questions reflect those of FWs COVID-19 Factory Health and Safety Measures Checklist. However, as described in indicator 2.4, Picture has done too little to follow up on the worrisome answers that suppliers included. Additionally, while the brand was aware that factories temporarily closed, it did not investigate whether workers continued to receive a LMW, or in cases where answers showed that suppliers could experience financial difficulties, the brand did not ask whether suppliers dismissed workers. The Indonesian factory sent some pictures of their measures, such as a temperature check upon entry, but did not include how factory lines were set up to respect social distancing. Health and safety measures that other suppliers took have not been verified by the brand.

Requirement: The member needs to address the most urgent issues first, following its prioritisation of COVID-19 issues in collaboration with suppliers. Eventually the member should show additional steps to remediate all COVID-19 related issues. Picture should take measures to prevent the loss of jobs or lowering of wages at suppliers due to COVID-19, following the guidelines in Handbook: COVID-19 Lost wages and jobs series. Picture must verify what OHS measures its suppliers took in response to COVID-19.

Please note that following Fair Wear’s policy for repeated non-compliance in Fair Wear’s Brand Performance Checks, members that receive an insufficient or -2 score on this indicator for the second year in a row, will be placed in the ‘Needs Improvement’ category.

Recommendation: Turkey:

For its Turkish supplier and subcontractors, we recommend Picture to conduct additional monitoring efforts and organise audits and provide training in line with the Fair Wear guidance on Turkey. Picture is encouraged to make an agreement with its supplier that it should be informed beforehand if new subcontractors will be used.

Other:

Picture is recommended to enrol its main Chinese supplier in the ILO Score programme to improve cooperation between management and workers. To investigate whether there is no Uyghur labour further down its supply chain, Picture can consider uploading all second and third tier locations to include them in Global Works research. FWF strongly recommends members to sign the FoA Protocol in Indonesia. The FoA Protocol is a protocol signed between the Indonesian trade unions, and some leading sport brands. Picture could also check the documentation in the factory documenting worker-management dialogue. For both Indonesia and Vietnam, Picture can consider enrolling its suppliers in the WEP Communication module and paying more attention to gender based violence.

COVID-19:

Picture is advised to discuss with its suppliers which support it can provide in implementing OHS measures in response to COVID-19, or where suppliers struggle with liquidity, how it can support them to continue paying wages.

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: Picture works together with FW and non-FW clients of shared suppliers, sharing information and CAP follow up.

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: Picture sources at a production location in France, and since last year in Portugal as well. Though the latter has not been visited yet due to the pandemic, Picture could show a signed questionnaire and posted Worker Information sheet. Upon request of Picture, both locations have filled in its COVID-19 survey.

Recommendation: Picture is recommended to conduct a basic health and safety check at its new Portuguese supplier, with help of the checklist that FW provides. This can also be done via a video tour.

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: 10

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.	1	
Number of worker complaints resolved since last check.	0	

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

Comment: The sustainability manager follows up on any complaint raised through the Fair Wear complaints handling system.

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: Picture has a system in place to check whether the worker information sheet is posted. Either through a factory visit or by asking a picture of a posted Code of Labour Practices the brand is informed. Where previous pictures did not show if the WIS was posted in an easy accessible place, Picture has requested new pictures.

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.	55%	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: Picture has enrolled its main Chinese supplier in the WEP basic training. Picture sent the COVID-19 videos to its Indonesian and Turkish supplier, and to its sourcing agent who sent it to two Vietnamese suppliers. However, it has not verified that workers actually saw the video, and therefore these suppliers cannot be included.

Recommendation: When members share the FW COVID-19 videos with its suppliers they should verify that workers have watched them.

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: A complaint was filed by a worker working for the main Chinese supplier. After his leave during which he worked for another factory, the supplier offered to take him back as assistant, a position with only half the wages that he was making before his leave. The worker refused and resigned. Picture collaborated with Fair Wear and its supplier to solve this complaint. The worker received his outstanding wages except for 275CNY. Though this remains disputed, the complaint is now closed.

Recommendation: Picture is advised to inform the supplier's HR management about the legislation around leave; workers can work elsewhere during their leave and this should not be cause for demotion or dismissal. The brand can proactively check with its other Chinese suppliers how they would react to such a situation and inform them the same.

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

Comment: The main supplier where the complaint is filed is not shared with other FW members. Picture did discuss the complaint with another non- FW client, but this brand did not actively cooperate on solving the complaint.

Complaints Handling

Possible Points: 15

Earned Points: 10

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: Picture's new staff and sales force (agents & distributors) are trained on the environmental and social commitments of the company. Such trainings or workshops happen during Picture's sales meetings that occur twice a year or when a new employee is hired. Additionally FW- related topics are discussed during Instagram-lives or panel discussions and during meetings. When the new CSR intern joined, that was also taken up as an opportunity to share the FW work.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.2 All staff in direct contact with suppliers are informed of FWF requirements.	Yes	Sourcing, purchasing and CSR staff at a minimum should possess the knowledge necessary to implement Fair Wear requirements and advocate for change within their organisations.	Fair Wear Seminars or equivalent trainings provided; presentations, curricula, etc.	2	2	-1

Comment: Staff is informed in meetings, and the new due diligence process and corrective action plans, and factory follow-up overview have been shared.

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: Picture works with two agents. One of them is an agency they work with since the business was launched and has an office in the same building as Picture. This agent is in charge of relationships with the Chinese suppliers. Another agent is the main contact point with smaller suppliers (tail end).

Both agents are trained and regularly meet Picture's CSR manager. They support in identifying subcontractors, identifying other clients, sharing questionnaires, sharing specific Fair Wear news to factories and collecting existing audits. One agent is actively involved in following up CAPs of audit reports.

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: The brand did not enroll any supplier in a training programme that supports transformative processes.

Recommendation: Fair Wear recommends Picture Organic Clothing 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, Picture Organic Clothing 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 such as the ILO Score programme to improve cooperation between management and workers in China. Non-Fair Wear training must follow the standards outlined in Fair Wear's guidance and checklist available on the Member Hub.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.5 Degree to which member company follows up after a training programme.	No training programmes have been conducted or member produces solely in low-risk countries	After factory-level training programmes, complementary activities such as remediation and changes on brand level will achieve a lasting impact.	Documentation of discussions with factory management and worker representatives, minutes of regular worker-management dialogue meetings or anti-harassment committees.	N/A	2	0

Training and Capacity Building

Possible Points: 11

Earned Points: 5

5. Information Management

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
5.1 Level of effort to identify all production locations.	Intermediate	Any improvements to supply chains require member companies to first know all of their production locations.	Supplier information provided by member company. Financial records of previous financial year. Documented efforts by member company to update supplier information from its monitoring activities.	3	6	-2

Comment: The brand knows its main production locations and has identified subcontractors via questionnaires and audits. Besides identifying CMT-subcontractors for its Turkish supplier, the member also identified printing and embroidery subcontractors at some of its production locations. Picture's main Chinese supplier has not shared details of the embroidering subcontractor.

Recommendation: Fair Wear recommends Picture Organic Clothing to integrate systematic periodical checks with its agents whether all known production locations are still up to date and use the information coming from questionnaires to update supplier data, including subcontractors. Picture is strongly advised to make an agreement with its main Chinese supplier that all details of subcontractors for Picture's production should be shared with the brand. Picture should include all CMT and non CMT subcontractors in the database.

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 sustainability manager collaborates in its daily work with purchasing staff and the agents and shares information with them. Product managers go through the due diligence process that links to the health and safety guides and the different policies and country specific risks. However, the brand could improve its systems to more actively inform and involve these staff members. Production staff needs to go through the new due diligence process that refers to health and safety checklists, and the country specific risks like with Syrian refugees.

Recommendation: It is advised to make relevant staff aware of the available tools Fair Wear offers, such as the Health and Safety guides, monitoring CAP documents, access to Fair Wear's online information system. Purchasing staff are recommended to share reports from factory visits that include a status update of implementing the CoLP. For future CAP follow-up, FWF advises Picture to establish a clear communication system between factories, agents, sourcing director and the CSR manager.

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: Picture's communication complies with the FW Communications Policy.

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

Comment: Picture has disclosed all its production locations. 100% of production volume is disclosed to other members and on the Fair Wear website. The performance check is published on Picture'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: Picture has submitted a social report and published it on the 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: Top management annually checks progress on FW work and this has led to making more capacity available via the hiring of an intern for CSR. Especially considering that since the pandemic Picture has not been able to visit its suppliers, it appreciates the work of Fair Wear even more.

Recommendation: Fair Wear advises Picture Organic Clothing to organise a meeting with management and sourcing staff to discuss the outcomes of this performance check and use those to formulate future plans.

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.	57%	In each Brand Performance Check report, Fair Wear may include requirements for changes to management practices. Progress on achieving these requirements is an important part of Fair Wear membership and its process approach.	Member company should show documentation related to the specific requirements made in the previous Brand Performance Check.	4	4	-2

Comment: From last year's requirements, those for indicator 1.8 and 1.9 are still outstanding. The tail end requirements have not been followed up. Picture did follow up on the requirements for 1.11, 2.7, 3.3 and 7.2, hence the percentage of resolved requirements is 57%.

Evaluation

Possible Points: 6

Earned Points: 6

Recommendations to Fair Wear

Picture would like more guidance on how to follow up brand performance check results and feels it needs to be more pushed and provided tight deadlines for improvement. Fair Wear could check if all needed questions are included in surveys or policies that Picture drafts. Picture would appreciate if Fair Wear could share what is happening in the industry; for instance how are other buyers responding to increased material, labour and transport costs.

Scoring Overview

Category	Earned	Possible
Purchasing Practices	20	46
Monitoring and Remediation	10	26
Complaints Handling	10	15
Training and Capacity Building	5	11
Information Management	4	7
Transparency	6	6
Evaluation	6	6
Totals:	61	117

Benchmarking Score (earned points divided by possible points)

52

Performance Benchmarking Category

Good

Brand Performance Check details

Date of Brand Performance Check:

13-09-2021

Conducted by:

Niki Janssen

Interviews with:

Florian Palluel - CSR manager

Gillian Rosh - Sustainability intern

Adeline Leservoisier - Demand supply planner

Julien Durant - Picture Co-founder, and sourcing manager