



# **Brand Performance Check**

**JBC n.v.**

**Publication date: November 2021**

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](http://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

**JBC n.v.**

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

Member company information	
Headquarters:	Houthalen , Belgium
Member since:	2015-03-31
Product types:	Garments, clothing, fashion apparel
Production in countries where Fair Wear is active:	Bangladesh, China, India, Tunisia, Turkey
Production in other countries:	Morocco, Netherlands, Pakistan
Basic requirements	
Workplan and projected production location data for upcoming year have been submitted?	Yes
Actual production location data for evaluation period was submitted?	Yes
Membership fee has been paid?	Yes
Scoring overview	
% of own production under monitoring	68%
Benchmarking score	51
Category	Good

## Summary:

JBC N.V. has met most of Fair Wear's performance requirements. With a benchmarking score of 51 and a monitoring percentage of 68%, Fair Wear is awarding it the 'Good' category.

## **Corona Addendum:**

JBC's shops were fully closed during the pandemic for three months and partly closed for six months. The company had people on an average of 60% furlough between March and June 2020. It was able to cover some reduction in sales with online sales. JBC experienced a 20% reduction in turnover. The company experienced cash flow problems and reached out to suppliers to extend payments. Some agreed to extend payment terms, while others did not. JBC paid suppliers within the (newly) agreed timeframe. JBC did not cancel any orders. When shops opened again, JBC made sure to return the favour with prepayment on some orders.

JBC's CSR manager participated in different Fair Wear webinars on COVID-19 related risks. The CSR manager already had limited capacity before the pandemic. Due to furlough and differing priorities in the company, their capacity to address and follow up on risks was even more limited. The company did notice risks related to Health & Safety and wage loss. It discussed this mainly with the Bangladeshi production locations, where the government could not support workers, and factories decided to continue production to ensure workers would earn some money. JBC discussed (and received pictures of) health and safety measures taken at these facilities. Also, because JBC works with Letters of Credit in Bangladesh, it could provide financial stability for these production locations to continue wages to workers.

Because of the travel restrictions, the company could not visit its production locations as usual and had to hand over certain responsibilities to the local offices in China and Bangladesh and representatives in Turkey. This has improved some of the processes, such as greater shared responsibility for production processes and CSR. The brand intends to continue with this increased shared responsibility even after 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.	31%	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:** In 2020, 31% of JBC's production came from production locations where it was responsible for at least 10% of production capacity. This is a reduction compared to 2019 (80%), due to the consolidation of production of several smaller production locations into a bigger one that can produce different products for different categories.

JBC's financial year that is assessed runs from February 2020 to end of January 2021.

**Recommendation:** Fair Wear recommends JBC 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.	2%	Fair Wear provides incentives to clothing brands to consolidate their supplier base, especially at the tail end, as much as possible, and rewards those members who have a small tail end. Shortening the tail end reduces social compliance risks and enhances the impact of efficient use of capital and remediation efforts.	Production location information as provided to Fair Wear.	3	4	0

**Comment:** In 2020, approximately 2% of JBC's production came from factories where JBC buys less than 2% of its total FOB. This is much lower than last year (47%) and is due to the consolidation of production of several smaller production locations into a bigger one. JBC also reduced its total number of production locations from 145 to 88.



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.	50%	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:** JBC focuses on maintaining long-term business relationships with their suppliers. In 2020, 50% of their production was purchased from production locations where a business relationship has existed for at least five years.

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

**Comment:** JBC was able to show that new production locations were informed about the Fair Wear Code of Labour Practice and signed and returned the questionnaire.

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:** JBC has a buying process which follows a strict criterion for placing orders especially in the case of new production locations. With the aim of developing more long-term relationships with factories, adding new factories or suppliers for production is heavily monitored.

A new potential supplier is shortlisted by the Sourcing & Buying manager based on production necessities, namely price, and quality. The supplier is then evaluated by the CSR manager based on its social compliance, and only approved when the Fair Wear Questionnaire is filled in and signed by the supplier. Once the Fair Wear Code of Labour Practices is posted in the local language in every factory. Furthermore, an audit report not older than six months is required from every factory. The audits are evaluated and discussed with the factory beforehand. In case there is no existing audit report, the potential supplier must agree to plan an audit by an external auditor before bulk orders are placed. In 2020, JBC collected external audit reports as part of the due diligence process for new production locations.

Only after this evaluation and positive feedback of both the Buying and Sourcing manager and the CSR manager can a new supplier be added and orders can be placed. The CSR manager has the last say in this process and can also block new suppliers.

In 2020, JBC's CSR manager participated in several Fair Wear webinars on COVID-19 related risks. In June 2020, JBC sent an email to all suppliers to gather information on the health and safety situation and possibility to continue to pay wages. JBC kept in close contact with suppliers, through buyers in Belgium and also through local representatives in China, Bangladesh and Turkey. In the communication there was special attention for health and safety measures and the possible impact of lockdowns, factory closure or reduction of capacity on production.

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

**Comment:** The CSR manager has developed a system to track production location's progress on compliance with the Code of Labour Practices, using Fair Wear and external audit data. This vendor rating is discussed with specific buyers responsible for a specific production location. The vendor rating is also discussed with the suppliers and it is made clear upfront that a lack of transparency and unwillingness to cooperate on improvements will result in decreasing orders.

In 2020, JBC discussed the status of orders and did not cancel any orders that were already in production. Based on sales forecasts the company did decide to reduce the forecast on certain orders, in close communication and agreement with factories who had limited capacity.

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:** JBC's planning system ensures that production locations are not given more orders than they can handle. This is done using a combination of the factory indicating its maximum capacity and an assessment of JBC staff done during production location visit(s). An online system within JBC then shows the amount of production that can take place and 'blocks' orders that exceed this limit from being entered. The planning starts from the intended delivery date, indicating what deadlines the company has to meet internally to allow enough time for production. This internal planning also includes possible factories where production will take place, so suppliers can be informed. In addition, the company produces "never out of stock" items as much as possible in lower production seasons.

JBC plans orders each month, and in 2020 this planning was adjusted continuously to accommodate unexpected changes in capacity and availability.

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:** JBC did not do any audits in 2020 and did not receive information about excessive overtime. In 2020, JBC was in close contact with production locations to discuss capacity and adjust the planning to ensure proper working hours. The brand also supports several production locations with production planning to manage working hours. JBC did not explicitly discuss root causes of excessive overtime with production locations.

**Recommendation:** In cases where audits were not possible, the member could make use of additional monitoring tools, such as worker surveys, to monitor working hours at its suppliers

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:** At the moment the company does not have sufficient information, such as a breakdown of the CMT costs in production minutes or specific minute price, to link the prices it pays to the wages in production locations. However, this is high on the agenda of the CSR manager.

**Requirement:** JBC 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.	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:** JBC reached out to suppliers to check on payment of legal minimum wage during factory closures. However, due to lack of capacity the company was not able to properly follow-up on the information provided.

**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.

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:** Due to the lockdown in Europe all JBC stores were closed and the company experienced cash flow problems. It reached out to suppliers to discuss possible extension of payment terms. Some suppliers agreed and when stores opened again JBC was sure to also support its suppliers with pre-payments.

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:** JBC collects information on wage levels in factories from audit reports. Most production locations do not pay living wages, but some pay above average. The company has discussed the root causes of living wages with some of their core suppliers and addressed possible root causes beyond the buying prices.

In early 2020, JBC's CSR manager started a process to address raising wages in several production locations in Bangladesh. However, in the process it was indicated by government officials that these projects may have a negative effect on the competition between factories. This response, combined with a lack of resources, meant the efforts were put on hold.

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

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.13 Member company determines and finances wage increases.	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:** JBC focused on ensuring payment of legal minimum wage in all their production facilities and therefore did not determine a target wage or a finance strategy.

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:** Based on available information, none of JBC's production locations pay living wage.

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## Purchasing Practices

**Possible Points: 52**

**Earned Points: 24**

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## 2. Monitoring and Remediation

Basic measurements	Result	Comments
% of production volume where an audit took place.	68%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.		
Member meets monitoring requirements for tail-end production locations.	Standard monitoring below 80%	Monitoring threshold below 80%.
Requirement(s) for next performance check		
Total monitoring threshold:	68%	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:** JBC has a designated CSR person who follows up on all problems identified in the monitoring system. The CSR person is assisted by one person in China and one person in Bangladesh to follow-up on country-specific issues.

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



Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.3 Audit Report and Corrective Action Plan (CAP) findings are shared with factory and worker representation where applicable. Improvement timelines are established in a timely manner.	No Corrective Action Plans were active during the previous year	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.	N/A	2	-1

**Comment:** In 2020 the company did not have any active Corrective Action Plans.

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:** In 2020, JBC was unable to follow-up on Corrective Action Plans or other findings from its monitoring activities due to lack of resources.

**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.

Resolving and remediating non-compliances is one of the most important criteria member companies can do towards improving working conditions. Fair Wear expects JBC n.v. to examine and support remediation of any problem that they encounter. Coordinated efforts between different departments are required to ensure sustained responses to CAPs.

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:** As part of JBC's sourcing policy, any existing audit reports are always first collected and assessed before placing any orders. It is part of the standard process that the audit findings are discussed and corrective actions are implemented. In 2020, the company did collect external audit reports but was not able to follow-up on findings due to lack of resources. These audits have not been counted towards the monitoring threshold.

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

**Comment:** When JBC assesses its production locations there is increased attention for country-specific "high risk" areas. The company was able to provide some examples related to these risks:

39% of total FOB is produced in Bangladesh. JBC is aware of Fair Wear's Enhanced Monitoring Programme for Bangladesh. Bengali suppliers are informed that the company is a signatory of the 'Accord on Fire and Building Safety in Bangladesh'. Therefore, it can only enter a business relationship if the supplier is a partner of the Accord and is open for inspections and respects provisions of the Accord. In the past three years, only one active production location (out of 31) had a WEP training in the last three financial years. For this reason, full points cannot be awarded.

16% of total FOB is produced in Turkey. JBC closely follows the changing context in Turkey. As millions of Syrian refugees live and work in Turkey now, there is an increased risk for illegal Syrian workers and child labour in the Turkish garment sector. JBC discussed the risks with its Turkish suppliers to prevent or mitigate related risks. A letter has been shared with Turkish suppliers to outline the risks and desired approach. Suppliers are expected to sign the letter and send back to assure it has been read and can be referred to. During the performance check JBC was able to show signed letters from suppliers. JBC has a team of local representative in Turkey that visit production locations to monitor production to prevent unauthorised subcontracting. Due to COVID-19 not all locations have been audited.

23% of total FOB is produced in China. JBC is aware of the risks related to overtime in China, and has adjusted its production planning system to ensure it does not go over requested/scheduled capacity. In addition, the company pays special attention when production locations have dormitories to ensure workers living situation is good. The local team is especially focused on checking audit reports on working hours and ensure capacity figures are adjusted when excessive overtime is found. JBC has not included the risks related to Freedom of Association or discrimination against Uyghur people into their risk assessment.

Regarding COVID-19, JBC is aware of the main risks regarding health and safety, wage losses and impact of purchasing practices. In Bangladesh, production locations informed the company that the government was not able to provide financial support to workers, so factory management arranged for workers to continue to work and earn money while taking health and safety measures. JBC monitored the situation and ensured financial stability for the factories to continue payment of wages. In other countries JBC did not check on wages. In China, several companies shared information on health and safety measures. In the general outreach of JBC to its suppliers it asked whether other customers were part of multi-stakeholder initiatives to enable different customers to jointly follow-up on possible problems.

**Requirement:** The member 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.

**Recommendation:** Fair Wear recommends JBC to enrol its Bangladeshi and Turkish suppliers in country-specific WEP trainings. We ask JBC to make a clear statement to its suppliers that, as a brand, it does not want to be involved with any forced labour in its supply chains, including subcontractors. We advise JBC to add the risk of Uyghur forced labour to its risk assessments.

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

**Comment:** JBC did not have any CAPs active in 2020.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.9 Percentage of production volume where monitoring requirements for low-risk countries are fulfilled.	No production in low-risk countries	Low-risk countries are determined by the presence and proper functioning of institutions which can guarantee compliance with national and international standards and laws. Fair Wear has defined minimum monitoring requirements for production locations in low-risk countries.	Documentation of visits, notification of suppliers of Fair Wear membership; posting of worker information sheets, completed questionnaires.	N/A	2	0

**Member undertakes additional activities to monitor suppliers.:** Yes (1)

**Comment:** JBC has one production location in the Netherlands responsible for a negligible part of FOB. As it is part of its due diligence process, the company has an external audit report for this location. Also the questionnaire is collected. However, the location has not been visited and therefore JBC does not meet the monitoring requirements.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.10 Extra bonus indicator: in case FWF member company conducts full audits at tail-end production locations (when the minimum required monitoring threshold is met).	No	Fair Wear encourages its members to monitor 100% of its production locations and rewards those members who conduct full audits above the minimum required monitoring threshold.	Production location information as provided to Fair Wear and recent Audit Reports.	N/A	2	0

**Comment:** Although JBC meets its general monitoring threshold, the company has not monitored all its production locations where it is responsible for more than 10% of production and therefore does not qualify for this bonus indicator.

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.	Yes	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.	1	2	0

**Comment:** JBC has shared the questionnaires with external brands it sells. Not all external brands have provided JBC with the necessary information.

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).	1%	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.	1	3	0

**Comment:** One of JBC's external brands is a member of Fair Wear.

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

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## Monitoring and Remediation

**Possible Points: 25**

**Earned Points: 11**

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### 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.	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:** JBC's CSR Manager is responsible for dealing with complaints from workers or their representatives against their employer within the supply chain of JBC.

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:** All production locations have posted Worker Information Sheets, and sharing a picture of the Worker Information Sheet is part of the onboarding process of new suppliers, as described under indicator 1.4.



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.	5%	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:** In the past three years JBC has organised WEP Basic trainings at four production locations, responsible for 5% of its production volume.

**Recommendation:** Fair Wear recommends JBC to actively raise awareness about the Fair Wear Code of Labour Practices and Fair Wear complaint helpline among a larger portion of its suppliers. JBC should ensure good quality systematic training of workers and management on these topics. To this end, JBC 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:** JBC was able to resolve one complaint it had received in 2019 regarding an administrative error in Bangladesh. It received one complaint in 2020 in India, from workers indicating they could not take their leave. JBC followed the complaint procedure. However, the complaint was only partly resolved.

**Recommendation:** It is recommended to uncover the root causes of complaints and prevent them from recurring. When appropriate, the investigation includes incidents at other factories.

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

## Complaints Handling

**Possible Points: 15**

**Earned Points: 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:** JBC's CSR manager gives presentations internally on a regular basis. There are also presentations for new employees on the topic of CSR and Fair Wear. The CSR Manager also regularly provides a CSR update during monthly staff meetings and is involved in on-boarding of new employees.

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

**Comment:** The CSR manager has one-on-one meetings with new buyers about Fair Wear and social compliance in general who are in direct contact with suppliers as part of their onboarding policy. Explanation of human rights due diligence needs to be frequently repeated, especially in relation to JBC's order blocking system.

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	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.	1	2	0

**Comment:** JBC works with several agents. These agents are all informed of Fair Wear membership and took steps to ensure access to factory level information. These agents have not yet taken an active role to support implementation of the Fair Wear Code of Labour Practices by, for example, following-up on CAPs or providing training sessions to factory management.

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:** In one production location in Bangladesh, a WEP on violence prevention capacity building was organised. This production location accounts for less than 1% of production.

**Recommendation:** Fair Wear recommends JBC 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, JBC 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

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## **Training and Capacity Building**

**Possible Points: 11**

**Earned Points: 4**

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## 5. Information Management

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

**Comment:** JBC ensures it has all information on production locations through regularly updated (external) audit reports. In addition, with support of the local teams in China, Bangladesh and Turkey it is able to visit most production locations. All these activities resulted in a better overview of production. Through closely monitoring capacity per production location, JBC reduced the risk of unauthorised subcontracting.

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:** JBC's CSR manager updates all relevant staff regularly, for example during buyers meeting, every other month. In addition, the CSR manager has a meeting with the Chief Buying Officer every three weeks.

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## Information Management

**Possible Points: 7**

**Earned Points: 7**

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## 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:** JBC communicates about Fair Wear on its website, magazine and additionally on the doors of its headquarters, email signatures of employees and in their stores. All communication is compliant 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.	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:** JBC has signed the transparency pledge and includes a list of suppliers in the social report.

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:** JBC published a complete and accurate sustainability report on its website.



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## Transparency

**Possible Points: 6**

**Earned Points: 6**

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## 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:** JBC's top management regularly reviews Fair Wear membership, social compliance and its efforts related to both.

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.	0%	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:** JBC did not follow-up on the requirement from previous performance check related to establishing the link between buying prices and wages due to lack of resources.

## Evaluation

**Possible Points: 6**

**Earned Points: 0**

## Recommendations to Fair Wear

JBC recommends Fair Wear to support the company with training to better integrate CSR in the company and to help to organise all the information that is available.

## Scoring Overview

Category	Earned	Possible
Purchasing Practices	24	52
Monitoring and Remediation	11	25
Complaints Handling	10	15
Training and Capacity Building	4	11
Information Management	7	7
Transparency	6	6
Evaluation	0	6
Totals:	62	122

### Benchmarking Score (earned points divided by possible points)

51

### Performance Benchmarking Category

Good

## Brand Performance Check details

Date of Brand Performance Check:

12-07-2021

Conducted by:

Anne van Lakerveld

Interviews with:

Cherry Ding: General Manager JBC China Office

Anne-Sophie De Goy en Kim Sampermans: Buyers

Ann Claes: Chief Buying Officer

Michiel van der Meer: Head Sourcing and Buying

Valerie Geluykens: CSR Manager