



## **Brand Performance Check**

### **Bel-confect NV**

This report covers the evaluation period 01-07-2020 to 31-12-2021

## 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

## Bel-confect NV

Evaluation Period: 01-07-2020 to 31-12-2021

Member company information	
Headquarters:	Dottenijs , Belgium
Member since:	2016-05-31
Product types:	Workwear
Production in countries where Fair Wear is active:	Bangladesh, China, India, Tunisia, Turkey
Production in other countries:	Albania, Belgium, Hungary
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	81%
Benchmarking score	82
Category	Leader

## Summary:

Bel-confect has shown advanced results on performance indicators and has made exceptional progress. This effort results in a benchmarking score of 82, which means that Bel-confect is now awarded the Leader category. Bel-confect has 81% of its own production under monitoring.

## Corona Addendum:

Despite all COVID-19 challenges, Bel-confect succeeded in closing its financial year with good results. The long-lasting and close cooperation with its suppliers and the robust monitoring system ensured professional handling of all COVID-19 related issues. In its past financial year, the member brand merged its purchasing department and CSR department together. The CSR manager has a double role, being responsible for purchasing and CSR tasks. In this double-role, the CSR manager had weekly contact with all suppliers, and a thorough follow up on all COVID issues was done together with the CEO, production manager, and CSR advisor. The delay of raw materials resulted in late order deliveries, and the company showed maximum flexibility to hold off any pressure on its supplies and its workers. All customers have proactively been informed by the member brand about delivery delays. In addition, the rise of material costs, freight costs and others, leading to the increase of production costs, have been covered by the member brand by agreeing to price increases. In addition, the CSR manager closely followed up on proper payment of wages, especially the payment of legal minimum wages when suppliers were in lockdown. Therefore, extensive pay slip verification was done. Bel-confect monitored its suppliers on the implementation of health and safety measures for all workers and supported its suppliers wherever possible. No orders were cancelled or reduced, urgently needed orders were shipped by airfreight on the member brand expenses, orders were pre-financed, facemasks and sanitiser gel were shipped to suppliers, and COVID-19 self-tests were reimbursed. In cooperation with other brands, two respirators were shipped to Tunisia. Bel-confect continued its efforts on living wages, resulting in payment of living wages at its main supplier in Tunisia.

In the past financial year, Bel-confect has shown great dedication and support to its suppliers. The brand's solid monitoring and remediation have been rewarded with the Leader-status. Fair Wear recommends Bel-confect to continue its living wage approach with other suppliers. In addition, Bel-confect is encouraged to include its ready-made-garment suppliers into its focus and start working on complex findings such as overtime and social dialogue.

## 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.	89%	Member companies with less than 10% of a production location's production capacity generally have limited influence on production location managers to make changes.	Supplier information provided by member company.	4	4	0

**Comment:** Bel-confect works with 18 production locations, and sources in Albania, Bangladesh, Belgium, China, Hungary, India, Tunisia and Turkey. The number of active production locations decreased from 23 in 2019 to 18 in 2021, which is due to the fact that Bel-confect works project-based and does not have automatically similar production each year.

Bel-confect's key production locations are in Tunisia, approximately 64% of its production volume is produced here. The owners of Bel-confect are also owners of a distribution centre (DC) in Tunisia. The staff of this DC is in daily contact with factories concerning planning, quality and follow-up on Corrective Action Plans (CAPs).

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.1b Percentage of production volume from production locations where member company buys less than 2% of its total FOB.	6%	Fair Wear provides incentives to clothing brands to consolidate their supplier base, especially at the tail end, as much as possible, and rewards those members who have a small tail end. Shortening the tail end reduces social compliance risks and enhances the impact of efficient use of capital and remediation efforts.	Production location information as provided to Fair Wear.	3	4	0

**Comment:** Bel-confect's production is project-based, if a new (procurement) project comes in, production can be scaled up quickly. Bel-confect bought 6% of its production volume from production locations where it buys less than 2% of its total FOB. The brand followed up on Fair Wear's recommendation to further consolidate its tail end suppliers and succeeded to decrease the percentages of its tail end suppliers from 12% in the previous year down to 6%. Bel-confect focuses more on a stable supplier base, even in the tail end and prefers selecting suppliers which share the member brand's sustainable values. Orders are preferably given to suppliers which especially support Bel-confect's approach of payment of living wages.

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.	56%	Stable business relationships support most aspects of the Code of Labour Practices, and give production locations a reason to invest in improving working conditions.	Supplier information provided by member company.	3	4	0

**Comment:** Bel-confect values long term business relations. With 56% of production locations, there is an existing business relation for at least five years. This number increased by 21% compared to the previous year (35%). The number increased because of higher production volumes at the long-term suppliers and as in this financial year one Tunesian supplier can be counted to the five years business relationship.

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

**Comment:** As part of its due diligence, Bel-confect requires a signed and returned questionnaire with the Code of Labour Practices from (new) production locations before placing orders. Four new production locations were added and Bel-confect could show the signed questionnaires of all new suppliers.

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

**Comment:** Bel-confect works with a due diligence procedure for (new) production locations. A social risk analysis is part of this process. Fair Wear country studies, risk policies and webinars are used as input to stay up to date on the situation in a production country. However, Bel-confect does not yet rate and prioritize the assessed risks.

The due diligence process is clearly defined and is integrated into Bel-confect's sourcing strategy. During the first contact with a potential new supplier, Bel-confect's Fair Wear membership is explained, country-specific risks are discussed and an existing audit report is requested and analyzed when available. Bel-confect has developed guidelines for the assessment of audits and analysed the quality of the audit with the Fair Wear Audit Quality Assessment Tool. In the sampling process, suppliers have to return the signed Code of Labour Practices (CoLP) questionnaire and a photo of the Worker Information Sheet in the facility. When the production manager visits the locations, photos are taken and well documented along with all relevant files. As Bel-confect has merged its purchasing and CSR department together, the CSR manager is also responsible for purchasing. Orders can only be placed after the allocation by the CSR manager. For the four new production locations, information was gathered and analyzed, in accordance with the due diligence process. The member brand could show proof of all identified risks per sourcing country.

Bel-confect has implemented a new Enterprise Resource Planning (ERP) system in its past financial year. This new system includes all relevant CSR information per supplier. Since Bel-confect has started to implement payment of living wages at one of its suppliers the brand decided to prefer suppliers which actively supports this process. The new ERP system with incorporated CSR information enables the purchasing staff to select these preferred suppliers.

In the past financial year, Bel-confect had to onboard a new supplier in China, as one production facility was in lockdown and could not cover the brand's orders. The CSR manager followed up on payment of wages at this facility and payslips were sent for verification. The CSR manager was on a weekly basis in close contact with all suppliers. In addition, six audits were conducted at suppliers in Bangladesh, China, Tunisia and Turkey. Extensive files, including all correspondence and all COVID-19 related information per supplier, were kept on the member brand's file system. The main identified risks during the COVID-19 pandemic were the health and safety of the workers, correct payment of wages and keeping the production sites running. Bel-confect undertook efforts to support its suppliers by accepting delays and pre-payments of orders. For its main sourcing country Tunisia the brand organised the shipment of face masks, covered supplier's expenses for COVID self-tests and (in cooperation with other brands) organized the shipment of two respirators.

**Recommendation:** Fair Wear recommends Bel-confect to create a more systematic way of risk management, to have a clear overview and to enable better prioritization of risk mitigation. Bel-confect is encouraged to make more explicit how social compliance in the supplier rating system, in which quality, relationship, price, and planning is assessed, weighted and how compliance with CoLP leads to production decisions.

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

**Comment:** Bel-confect evaluates the social compliance of its suppliers systematically, based on a signed questionnaire, factory visits, social audits and CAP follow up. The brand's new ERP system includes CSR relevant information per suppliers. This information needs to be filed into the system before it is technically possible to place an order. Bel-confect's overall strategy is to especially support such suppliers, which do have the same aim and understanding when it comes to payment of living wages and actively work on improvements on the Fair Wear Code of Labour Practices. All purchasing staff is made aware of this strategy. All suppliers are evaluated once a year by the CSR manager, CSR advisor, purchasing manager and CEO. Yet, the brand does not have a file, collecting all relevant information of all departments/stakeholders for the supplier's evaluation, nor does it have an overview of the results of the evaluation and decisions made based on the evaluation. The suppliers are not informed about the brand's evaluation.

Bel-confect's supplier in Albania did not agree to be audited. As audits are a minimum requirement, the member brand discussed the situation with its supplier. Despite all efforts to convince the supplier to accept an audit, the supplier refused. According to the exit strategy of the brand, a slow phasing out procedure has now started. The supplier is informed about the future end of the cooperation, but will receive further orders until the fabric and accessories stock is emptied.

Throughout the past financial year, Bel-confect's CSR manager informed herself extensively about the COVID-19 situation and related risks of all suppliers. All information gathered was filed on the member brands' server. Bel-confect actively supported its suppliers and pre-financed orders were needed.

**Recommendation:** Bel-confect is recommended to enhance the existing exit strategy and incorporate this policy into its sourcing strategy.

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

**Comment:** For the custom-made production, which is the vast majority of Bel-confect's volumes, a production scheme is used with defined steps for quality check of the fabric, dyeing, design, production etc. Leadtimes are always first confirmed with suppliers. Bel-confect mostly works on a project base with its clients, creating custom-made items with a lot of interaction during the process. After each step (duration is 3-4 weeks), Bel-confect has a check-in moment with its clients for each step to confirm the status of the product. This enables clients to be involved in every stage of the production process. Delays are communicated at an early stage, which minimizes the risk of pressure on suppliers. An extra two weeks is always provided as a buffer and no absolute deadline is set. The brand is convinced that the production sites and workers should not work under pressure, which is in addition beneficial for the quality of the garments.

Also, Bel-confect works with a permanent stock to be able to better plan and forecast the materials. Capacities are well-known by the member brand and where needed, suppliers receive orders with priority indication to ensure more flexibility in case of delays at the production site. Forecasts are only provided for material orders, production sites do not receive forecasts. Factory and public holidays are taken into account in the production planning. Each Friday, the CSR manager with its double function as purchasing manager receives a weekly update of the status of the orders from all suppliers. Via doing so potential delays are uncovered at an early stage. Delivery delays are always accepted by the brand and the suppliers never have to pay penalties.

During COVID-19, no orders were cancelled but Bel-confect faced order delays due to (raw) material delays and reduced production capacities. The brand's management drew up a letter to inform its customers about the delays and accepted all delayed delivery times. Where needed, orders were split and shipped by airfreight on the brand's expenses.

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

**Comment:** When excessive overtime is discovered in an audit, Bel-confect responds by discussing the results of the audit and the Corrective Action Plan (CAP). Based on external audit results, excessive overtime was found in two factories in China. Bel-confect followed up on these findings and discussed the issue with both of its suppliers. However, the brand finds it difficult to uncover the root causes and to start sustainable remediation with its Chinese suppliers.

**Recommendation:** Bel-confect is recommended to continue the dialogue with suppliers to understand the root causes of excessive overtime. Identifying how overtime can be prevented, and providing support to factory management to manage overtime is key in resolving issues. Purchasing Practice (Self) Assessments (PPA/PPSA) are a good start to uncover the brand's contribution to (excessive) overtime. Also, Fair Wear recommends cooperation with other customers at the factory to increase leverage, when trying to mitigate excessive overtime hours.

Bel-confect is encouraged to use Fair Wear's Fair working hours guide to reduce excessive overtime as a supporting tool.

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.	Advanced	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.	4	4	0

**Comment:** Bel-confect is aware of minimum wages per country and closely follows up on every change. When there is a rise in legal minimum wages, buying prices are always adjusted and increased. For the custom-made production, which is the vast majority of Bel-confect's volumes, the brand has an exact knowledge about the material costs, the production minutes per style and labour costs. For the ready-made garment business, Bel-confect does not know the production minutes per style nor the labour costs. The brand works with a cost breakdown for these articles, including general percentages for labour costs. All this information is entered into the brand's new ERP system. Prices given by the suppliers are generally accepted by the member brand. To verify if the brand's prices contribute to the payment of at least legal minimum wages, the CSR manager collects payslips of the ready-made garment suppliers.

In Turkey, the brand pays special attention to the rapid increase of inflation. One Turkish supplier shared an open costing calculation with Bel-confect. Bel-confect agreed to increase the prices to support both suppliers and the workers to cover the cost of living. For one of its main suppliers in Tunisia, Bel-confect has insight into the labour costs per style and uses an open costing model for this.

The costs related to COVID-19 measures are partly known by the brand as Bel-confect paid for example the expenses for COVID-19 self-tests.

**Recommendation:** Fair Wear encourages Bel-confect to extend the lessons learned related to the open costing model to other suppliers, especially its ready-made garment suppliers. Fair Wear's Fair price app supports this process and also enables suppliers to include any Covid-19 related costs.

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

**Comment:** In the past financial year, two Fair Wear audits were conducted in Bangladesh and Turkey. For the Bangladeshi supplier, there were no findings related to the non-payment of legal minimum wages observed. The audit report for the Turkish supplier is not delivered to the member brand, yet. In addition, Bel-confect collected several external audits of its suppliers in China and Tunisia. The two Chinese audit reports did not reveal any findings regarding the non-payment of legal minimum wages. However, inconsistencies regarding correct payment of social insurances were observed. The member brand integrated these findings in its CAP-follow up with both suppliers. Bel-confect requested an audit at its new Tunisian supplier. This audit revealed a lot of findings, including non-payment of legal minimum wage. The member brand immediately followed up on this issue. The CEO visited the supplier and all CAP findings were discussed. Bel-confect closely monitored the supplier and requested payslips to ensure the payment of legal minimum wages for all workers. Two suppliers in Tunisia got bankrupt. One supplier re-started business with a new name and some of the former workers. The supplier decided to only produce for the local market anymore. Bel-confect followed up on this issue, investigating if workers were able to find work in factories nearby and if all workers received the wages and severance payment. However, as no cooperation was possible anymore, no payslips were requested to verify the information given.

Throughout the past financial year and especially in case suppliers were in lockdown, Bel-confect followed up on proper salary payment at its suppliers, especially ensuring that legal minimum wages were paid. To verify the information given the brand requested proof of payslips. Extensive records were shown during the performance checks.

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

**Comment:** Bel-confect has continued its procedure of prepayment to all suppliers during COVID-19, to act responsibly and ensure enough cash flow on the supplier side. No evidence of late payments was found.

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.	Advanced	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	6	6	0

**Comment:** In previous financial years, Bel-confect started an active dialogue on living wages with its main Tunisian supplier, who participated in the Fair Wear living wage seminar in Tunisia. In addition, to support the process, to learn and gain more insight on possible methodologies Bel-confect enrolled in the Fair Wear Living Wage Incubator. This has been the starting point for the brand and the main supplier for even closer cooperation and significant improvement regarding the topic of payment of living wages. In the past financial year, calculations have been made to understand what is needed to cover a living wage at this supplier. Bel-confect discovered that the gap of the current wages to payment of living wages according to the living wage benchmark of the UGGT (Tunisian General Labour Union) was not as big as expected. Realistic planning and worker representation have been part of the discussions. In addition, Bel-confect has proactively started a conversation and raised awareness for the payment of living wages at its Tunesian suppliers. Bel-confect is focusing on its Tunisian suppliers, as the majority of production volume is bought from there. Furthermore, discussions on efficiency in the factories and social dialogue have been initiated and pushed by the member brand. As a next step Bel-confect plans to expand its living wage ambitions with another Tunisian supplier. Regarding the brand's other sourcing countries: wages and wage levels were discussed with all suppliers and payslips for verification were requested and evaluated. Yet there is no plan on implementing payment of living wages at these suppliers.

**Recommendation:** Fair Wear encourages Bel-confect to continue its way in exploring and payment of living wages, first in its main sourcing country Tunisia. Fair Wear recommends to meanwhile also starting a dialogue with (one of) its ready-made garment suppliers, on assessing root causes for wages lower than living wages, finding the gap and exploring possible solutions. Fair Wear encourages Bel-confect to involve worker representatives and local organisations in these steps.

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.	Advanced	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.	6	6	0

**Comment:** The brand has made a long-term commitment to the implementation of living wages. After having assessed the root causes for wages lower than a living wage and having analyzed the gap to ensure payment of living wage at the Tunisian main supplier, Bel-confect created a plan on how to close this gap. Together, the brand and the supplier, including worker representatives discussed possible options. The brand decided that an increase of production efficiency by buying new machines would not lead to workers' benefits as in the long run this only would mean that workers will lose their jobs, being replaced by high-tech machines. Also, after evaluation of the supplier's situation and margin, it was clear that the supplier was not able to cover the costs for payment of living wages on own expenses. Therefore, Bel-confect decided to pay the amount. As a first step, an agreement with the main supplier was made about the payment of the living wage. This agreement will ensure payment of living wages as a long-term solution, however, it will be reviewed each year. As it is difficult for Bel-confect and its supplier to incorporate the amount needed to pay for living wages into the supplier's prices yet and the fact that Bel-confect was determent to start payment of living wages in its past financial year, the brand decided to pay the amount as a one-time payment. The aim is to find a sustainable solution on how to incorporate living wage into the supplier's price in the next step. All workers have received this payment as a bonus payment in addition to their regular wages and Bel-confect received proof of payslips for verification.

**Recommendation:** Fair Wear recommends Bel-confect in cooperation with its supplier and the worker representatives to find a way how to incorporate living wages into the supplier's price system to ensure that workers earn a living wage on a monthly basis. Its recommended to use the Fair price app for support. In addition, Fair Wear recommends Bel-confect discuss and implement target wages with other suppliers.

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.	16%	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.	2	6	0

**Comment:** According to the agreement with Bel-confect and its main Tunesian supplier, a living wage has been paid to the workers by a one-time payment, counting for 16% of the brand's production volume.

**Recommendation:** We encourage Bel-confect to continue discussions and plans for wage increases, resulting in the payment of a target wage.

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## Purchasing Practices

**Possible Points: 52**

**Earned Points: 43**

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## 2. Monitoring and Remediation

Basic measurements	Result	Comments
% of production volume where an audit took place.	80%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.	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.
Total monitoring threshold:	81%	Measured as percentage of production volume (Minimums: 1 year: 40%; 2 years 60%; 3 years+: 80-100%)

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

**Comment:** The CSR manager and CSR advisor are designated to follow up on social compliance issues. The CEO and production manager are involved as well and are kept informed by the CSR team.

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.3 Audit Report and Corrective Action Plan (CAP) findings are shared with factory and worker representation where applicable. Improvement timelines are established in a timely manner.	Yes	2 part indicator: Fair Wear audit reports were shared and discussed with suppliers within two months of audit receipt AND a reasonable time frame was specified for resolving findings.	Corrective Action Plans, emails; findings of followup audits; brand representative present during audit exit meeting, etc.	2	2	-1

**Comment:** Bel-confect has a process in place for sharing audits and Corrective Action Plans (CAPs) with its production locations. Once received, the member brand shares the audit report and CAP with its suppliers and together agree on priorities and timelines. Afterwards, to follow up closely on CAP improvements, suppliers are visited by the production manager. Where possible, audit reports and CAP are shared with worker representatives.

In Tunisia, the production manager visits the suppliers multiple times per year and plays an active role in the follow-up of the CAP and is in contact with the worker representatives about CAP follow up. In case an agent has to forward an audit report and CAP to the supplier, Bel-confect gives an additional explanation to the agent by phone/email.

For several external audits done in this financial year, timely audit report and CAP sharing were shown.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.4 Degree of progress towards resolution of existing Corrective Action Plans and remediation of identified problems.	Intermediate	Fair Wear considers efforts to resolve CAPs to be one of the most important things that member companies can do towards improving working conditions.	CAP-related documentation including status of findings, documentation of remediation and follow up actions taken by member. Reports of quality assessments. Evidence of understanding relevant issues.	6	8	-2

**Comment:** At the end of 2021, two Fair Wear audits were conducted at Bel-Confect's suppliers in Bangladesh and Tunisia. As the audit reports were submitted at the beginning of 2022, respectively were not shared with the brand at the time of the Brand Performance Check, the CAP follow up will be evaluated in the next year. During the past financial year, Bel-confect collected six external audits of organizations such as amfori-BSCI, Wethica and Sedex of its suppliers in Bangladesh, China and Tunisia. During the Brand Performance Check, the member brand could show proof of extensive CAP follow up of Tunisian audits. Findings were discussed by the member brand's CEO and production manager with the suppliers during several visits Bel-confect was able to do in the past year. The CSR manager and CSR adviser closely follow up on all findings, collecting proof of evidence and also started remediation on more complex findings such as working hours and wages. Where possible, worker representatives were included in the remediation of the CAPs. One focus point for improvements was social dialogue and the member brand regretted that no trainings were possible during the past financial year for support. Despite all efforts of Bel-confect related to its Tunisian suppliers, it was visible that CAP follow up on audit reports of the member brands suppliers, especially in China were less intensive and structured. Proof of CAP follow up was shown, however remediation and mitigation of complete findings such as overtime were not started.

During COVID-19, Bel-Confect focused on COVID-19 related risks specifically, such as payment to workers and supporting health and safety measures. All suppliers in Tunisia were provided face masks and disinfection gel by Bel-confect and guidance was shared where needed. In addition, Bel-confect covered the supplier's expenses for COVID-19 self-tests and, together with other suppliers, shipped two respirators to Tunisia.

**Recommendation:** Fair Wear encourages Bel-confect to outspread its comprehensive CAP follow up and remediation on findings at its Tunisian suppliers also to its ready-made garment suppliers. Fair Wear recommends Bel-confect to gradually ensure factories establish independent worker representation and involve these representatives in monitoring and remediation of findings at these suppliers. In addition, Bel-confect is recommended to implement a more structural CAP-follow up for external audits such as of amfori-BSCI.

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:** Because of travel restrictions in 2021 that limited the possibility to conduct trainings, this indicator is not applicable in 2021. However, Bel-confect was able to visit five of its Tunisian suppliers, counting for 50% of the member's production volume.

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

**Comment:** Bel-confect prefers cooperating with other external audit organizations such as Wethica for its Tunisian suppliers. In addition, other external audit reports such as from Better Social Compliance Initiative (amfori BSCI) or Sedex were also collected throughout the past financial year of suppliers in Bangladesh and China. The CSR manager assesses the audit quality by the use of Fair Wear's Audit Quality Assessment Tool. The member brand could show follow up through exchange with factory managers and provided photographic evidence of remediation. However, the quality of an up to date CAP file for each production location differs per production location, depending on the audit organization.

**Recommendation:** Fair Wear highly recommends Bel-confect NV to implement a CAP systematic identical for all production locations and no matter by which audit organization the report and CAP is provided. This ensures a clear overview of basic and complex findings and the status of findings being resolved/unresolved. In addition, it would allow an evaluation of the supplier's CAP improvement, which could contribute to the supplier's overall performance evaluation (see also 1.5).

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.7 Compliance with FWF risk policies.	Average score depending on the number of applicable policies and results	Aside from regular monitoring and remediation requirements under Fair Wear membership, countries, specific areas within countries or specific product groups may pose specific risks that require additional steps to address and remediate those risks. Fair Wear requires member companies to be aware of those risks and implement policy requirements as prescribed by Fair Wear.	Policy documents, inspection reports, evidence of cooperation with other customers sourcing at the same factories, reports of meetings with suppliers, reports of additional activities and/or attendance lists as mentioned in policy documents.	5	6	-2
Compliance with FWF enhanced monitoring programme Bangladesh	Advanced			6	6	-2
Compliance with FWF Myanmar policy	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on abrasive blasting	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on risks related to Turkish garment factories employing Syrian refugees	Advanced			6	6	-2
Other risks specific to the member's supply chain are addressed by its monitoring system	Intermediate			3	6	-2

**Comment:** Bel-confect could show that it is well informed about the main risks in its supply chain. Bel-confect prefers to work with countries that are already known and of which a risk assessment has already been done and incorporated in its sourcing strategy.

Compliance with Fair Wear's enhanced monitoring requirements in BANGLADESH:

Although Bel-Confect only buys a very small amount (<2%) of its production capacity in Bangladesh, the company signed the renewal of the Accord on Fire and Building Safety. For its two Bangladeshi suppliers, Bel-confect works with an agent who is closely involved in CAP follow. Both suppliers fall under the Accord and in case any critical matters arise, the agent immediately shares this with Bel-confect staff. Bel-confect did not know about the functioning of the worker's anti-harassment committee at its suppliers. Both suppliers did not participate in a Fair Wear Harassment and Violation prevention training so far.

Compliance with Fair Wear's guidance on risks related to TURKISH companies employing Syrian refugees:

Bel-confect shared Fair Wear's questionnaire with its two Turkish suppliers. In this financial year, no new production locations were added in Turkey and no evidence of employed Syrian refugees was found in previous audits conducted so far. During visits, the topic was always discussed and the CSR manager also follows up by inquiring about (unauthorized) use of subcontracting partners and employment of migrant and Syrian refugees. Both suppliers are audited but did not participate in a Fair Wear Workplace Education (WEP) training so far.

Other risks in the member brand's supply chain

ALBANIA

Bel-confect has one supplier in Albania. This supplier refuses to be audited, which is mandatory for each of Bel-confect's suppliers. The need for audits and the whole issue has been extensively discussed with the supplier. As the supplier does not change its opinion, now a slow phasing-out process has started, according to the exit strategy of the brand. The supplier has been informed of this decision on time.

CHINA

Bel-confect identified risks among others, overtime and forced labour in this production country. The risks have been discussed with its suppliers. However, root cause analysis and remediation of overtime remain a challenge. Bel-confect has sent out a letter to both suppliers about the issue of forced labour. The suppliers in addition have signed the member brands Code of Conduct, in which Bel-confects refers to Fair Wears Code of Labour Practices. The CSR manager has informed herself about forced labour through attending Fair Wear's webinars. No supplier participated in a WEP training.

INDIA

Bel-confect is aware of the gender-based violence risks and collects information regarding these risks from Fair Wear and external audits. Bel-confect has informed about the functioning of the anti-harassment committee at its supplier as a step to reduce this risk. In addition, Bel-confect follows up on audit findings in monthly jour fix meetings. No training was provided to this supplier.

## TUNISIA

Bel-confect mainly sources from Tunisia, a production country which is very well known to Bel-confect staff, due to the long business history. The main risks, such as low wages and short term contracts are known. The member brand visits regularly its suppliers, even in COVID-19 times and is in contact with local staff in Tunisia, labour unions and other local organisations. Bel-confect started payment of living wages at its main supplier. The aim is to continue this project with another Tunisian supplier in the next financial year. It is common in Tunisia to employ workers only with short term contracts. Bel-confect's staff frequently discusses this issue with the suppliers. Only one of seven suppliers participated in a Fair Wear WEP training.

### Compliance with COVID-19 guidance:

Bel-confect did a risk assessment based on general and country-specific information provided by Fair Wear. The CSR manager informed herself by using Fair Wear's COVID-19 dossier and attended Fair Wear's information webinars. Identified risks like wages, health and safety of workers and financial stability of suppliers was closely monitored by the company. This meant that during the regular update calls suppliers were asked for information on whether wages were paid, what the COVID-19 situation was at that time in the factory and in the country/region and whether the factory need to take additional measures. Factories were asked to provide evidence, such as photos of health and safety measures and provide payslips for verification. Also, Bel-confect checked whether the worker information sheets were still posted, to ensure workers would know about their rights and the possibility to reach out for help. Information from these calls was also shared on management level. In addition, Bel-confect showed a responsible attitude by supplying production locations with the necessary protection equipment for example.

**Recommendation:** Fair Wear encourages Bel-confect to keep monitoring the systemic risks in its supply chain like excessive overtime, sexual harassment and violation, social dialogue and wages below living wage benchmarks. Fair Wear suggests Bel-confect to enrol its factories in training programmes, especially in Turkey.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.8 Member company cooperates with other FWF member companies in resolving corrective actions at shared suppliers.	Active cooperation	Cooperation between customers increases leverage and chances of successful outcomes. Cooperation also reduces the chances of a factory having to conduct multiple Corrective Action Plans about the same issue with multiple customers.	Shared CAPs, evidence of cooperation with other customers.	2	2	-1

**Comment:** Bel-confect cooperates with Fair Wear member brands at shared suppliers for CAP remediation. Also, Bel-confect was interested to cooperate on the topic of living wage with another Fair Wear member brand, however, this brand was not willing to support this cooperation.

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.	23%	Low-risk countries are determined by the presence and proper functioning of institutions which can guarantee compliance with national and international standards and laws. Fair Wear has defined minimum monitoring requirements for production locations in low-risk countries.	Documentation of visits, notification of suppliers of Fair Wear membership; posting of worker information sheets, completed questionnaires.	1	2	0

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

**Comment:** Bel-confect works with two production suppliers in low-risk countries; one in Hungary and one in Belgium. For both, Bel-confect could show the signed Fair Wear Code of Labour (CoLP) questionnaire. Due to COVID travel restrictions, Bel-confect could not visit its supplier in Hungary in the past financial year.

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.	Yes, and member has collected necessary information	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.	2	2	0

**Comment:** Bel-confect works with 11 external brands, mostly covering the shoe collection for Bel-confect. All external producers returned the signed questionnaire with the requested 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:** Bel-confect resold goods from two other Fair Wear member brands.

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: 31**

**Earned Points: 24**

### 3. Complaints Handling

Basic measurements	Result	Comments
Number of worker complaints received since last check.	0	At this point, FWF considers a high number of complaints as a positive indicator, as it shows that workers are aware of and making use of the complaints system.
Number of worker complaints in process of being resolved.	0	
Number of worker complaints resolved since last check.	0	

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

**Comment:** The CSR manager and CSR advisor are responsible for addressing worker complaints.

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

**Comment:** Bel-confect could show posted worker information sheets for a selection of suppliers. Each new supplier is asked to provide photographic evidence of the Worker Information Sheet and this is verified during factory visits. As visits to Bel-confect's sourcing countries Albania, China, Bangladesh, India, Hungary and Turkey were still not possible in the past financial year, the brand has asked for photos to show proper posting. However, most of the worker information sheets shown to Fair Wear during the Brand Performance Check were not up to date, e.g. with an old Fair Wear logo or even only in written format.

**Recommendation:** Bel-confect is recommended to check annually whether the posted Worker Information Sheets are up to date (Logo Fair Wear, Complaints hotline number).

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.	All production in low-risk countries	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.	N/A	6	0

**Comment:** Because of travel restrictions in 2021 that limited the possibility to conduct trainings, this indicator is not applicable in 2021. However, Bel-confect was able to organise one Workplace Education Program (WEP) Basic training at its Tunisian supplier to increase workers' awareness, counting for 23% of the brand's annual FOB.

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

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

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## Complaints Handling

**Possible Points: 3**

**Earned Points: 3**

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## 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:** Every month there is an internal meeting with the whole staff where Fair Wear membership is a standard agenda point. Staff, responsible for tenders, receives detailed information about CSR relevant topics of the suppliers. New colleagues receive a company presentation where the Fair Wear membership is included.

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 works closely together with the production manager, who is well aware of Fair Wear requirements. The CSR advisor and CEO are both involved in supplier contact as well. In addition, the CSR manager, CSR advisor and CEO have regular meetings to discuss all Fair Wear related topics such as audit results or living wage progress of the suppliers. The CSR manager gives a detailed briefing about the suppliers to the travelling staff of Bel-confect. In addition, travelling staff receive specific tasks to discuss with the suppliers or to check on like posted Worker Information Sheets or health and safety issues.

During COVID-19, CSR staff joined several Fair Wear webinars on specific topics: living wages, alternative training for suppliers, the new excessive overtime tool, how to deal with the COVID-19 situation in Tunisia, Bangladesh and China, etc.

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:** Bel-confect has invested time in informing its agents to understand the relevance of the Fair Wear Code of Labour Practices. Bel-confect is in close contact with its agents and receives frequent updates on all CSR related matters of its suppliers. The agent of the brand's suppliers in Bangladesh and China in addition actively supports the Code of Labour Practices and follows up on CAPs.

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.	All production in low-risk countries	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.	N/A	6	0

**Comment:** Because of travel restrictions in 2021 that limited the possibility to conduct trainings, this indicator is not applicable in 2021.

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: 5**

**Earned Points: 5**

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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.	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:** Fair Wear and external audits confirmed no issues with unauthorised subcontracting at audited sites. In the Code of Conduct (CoC) Bel-confect clearly defined that each supplier has to disclose all production locations to the member brand before starting production. This CoC is signed by all suppliers. In addition, the member knows the capacity of each location and uses that to check locations prior to production. In case of use of subcontracting partners, the supplier is required to enter the name of the subcontracting partner and its exact address into the order system, otherwise, the order can not be finalized. In addition, subcontracting is verified and discussed during factory visits. However, subcontracting restrictions and monitoring due diligence is not yet explicitly part of written agreements with suppliers.

During the COVID-19 crisis, the brand was still able to visit production locations in Tunisia and assessed risks regarding unauthorized subcontracting.

**Recommendation:** Fair Wear encourages Bel-confect to establish written agreements with its production locations on the use of subcontractors stating clearly that when subcontractors are used, they are included in the monitoring system.

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:** There is close cooperation between the CEO, production manager, CSR manager and advisor and information is shared in regular meetings. The CEO and production manager regularly visit the production locations. Before travelling the CSR manager updates the travelling staff on all CSR-related issues of the suppliers and hands out tasks like CAP follow up, Occupational Health and Safety (OHS) checks and other issues. After return, travelling staff shares all information gathered with the CSR manager. All information related to working conditions at production locations, including meeting minutes of factory visits, is accessible on Bel- confect's server. During the performance check, it was shown that information can easily be found and is shared in a transparent way.

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## **Information Management**

**Possible Points: 7**

**Earned Points: 4**

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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:** In all its communications, Bel-confect complies with Fair Wear's Communications policy. The brand does not have retailers or a webshop and does not use on-garment communication about its Fair Wear membership.

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:** Bel-confect discloses its supplier list in its social report, which is easily accessible on Bel-confect's website, yet has not disclosed these on the website of Fair Wear, nor shared these with other members in Fair Wear's internal system.

**Recommendation:** Fair Wear recommends Bel-confect to disclose all production locations on the Fair Wear website and to other members in Fair Force.

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	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.	1	2	-1

**Comment:** Bel-confect has submitted its social report to Fair Wear. The social report is not published on the member brand's website, yet.

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## **Transparency**

**Possible Points: 6**

**Earned Points: 5**

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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:** The CEO of Bel-confect is closely involved in the implementation of Fair Wear membership. Evaluation of membership showed top management a link between the company's improved quality and better social compliance. This is seen as an incentive to continue working on improvements. Fair Wear membership is evaluated annually with CSR manager and CSR advisor involved. Results of performance checks are used as input for new 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.	100%	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:** In the past financial year, two requirements related to payment of living wages were given. Bel-confect showed action and progress on both indicators by financing living wages at its main supplier in Tunisia.

## Evaluation

**Possible Points: 6**

**Earned Points: 6**

## Recommendations to Fair Wear

- Bel-confect finds some Fair Wear tools less accessible and easy to use, like for example the living wage calculation spreadsheet, however, the Fair price app is a good step in the right direction.
- Bel-confect finds the member hub difficult to use and not all information provided can be found easily.
- Bel-confect values the monthly calls with its Brand Liaison and the information and support provided. However, sometimes feedback takes too long.
- Fair Wear's monthly member updates are good.
- The Living Wage incubator was great and interesting. Bel-confect valued the good exchange with other brands and Fair Wear. However, unfortunately, the brand has not heard about the project for a long time
- Bel-confect complains about the long lead time until Fair Wear provides audit and WEP reports. For one audit, conducted on 21st December 2021, the report will be ready only by March 2022.
- Bel-confect positively remarks that Fair Wear has developed itself (technically speaking).

## Scoring Overview

Category	Earned	Possible
Purchasing Practices	43	52
Monitoring and Remediation	24	31
Complaints Handling	3	3
Training and Capacity Building	5	5
Information Management	4	7
Transparency	5	6
Evaluation	6	6
Totals:	90	110

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

82

### Performance Benchmarking Category

Leader

## Brand Performance Check details

Date of Brand Performance Check:

01-02-2022

Conducted by:

Annet Baldus

Interviews with:

Mr. Filip Lietaer, CEO

Mrs. Saartje Boutsen, CSR advisor

Mrs. Josefien Coffez, CSR manager