



# **Brand Performance Check**

## **HAVEP**

This report covers the evaluation period 01-01-2021 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 year's 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 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

## HAVEP

**Evaluation Period: 01-01-2021 to 31-12-2021**

Member company information	
Headquarters:	Goirle , Netherlands
Member since:	2004-01-01
Product types:	Workwear
Production in countries where Fair Wear is active:	Bangladesh, North Macedonia, Tunisia, Viet Nam
Production in other countries:	
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	100%
Benchmarking score	93
Category	Leader

## Summary:

HAVEP has shown advanced results on performance indicators and has made exceptional progress. With a benchmarking score of 93, HAVEP is again placed in the Leader category. Although the monitoring threshold does not determine the category this year, HAVEP has fulfilled the monitoring requirements at suppliers providing 100% of its production volume.

## Corona Addendum:

After some unrestful years with several staff changes in top management and financial challenges, a new CEO took over the responsibility to bring more (financial) stability into HAVEP. Therefore, 2021 was marked by staff changes, building of new teams and structures, business plans and strategies and the first successful implementation of these. In addition, the sustainability manager left the company in April of that year. The member brand ensured that important Fair Wear related tasks were designated to two staff members, who took over these tasks until the new sustainability manager started in August 2021.

HAVEP sources only in three countries. 99% of its production turnover comes from North Macedonia and Tunisia by using CMT suppliers. In addition, the brand also buys RMG articles from one supplier in Bangladesh. HAVEP also owns one factory in North Macedonia and works with local teams in its sourcing countries. The local teams are strongly connected to HAVEP and fully integrated into the headquarters team. The local team visits and supports the factories on an almost daily basis and reports in weekly meetings to the HAVEP headquarter staff in the Netherlands. This ensures a fluent information flow and short-term actions in case they are needed to remediate and mitigate issues.

HAVEP and its suppliers were not strongly affected by the COVID-19 pandemic in 2021. All factories were able to continue production. One of the main risks identified by the brand was lack of capacity due to sick workers. Two factories in Tunisia decided to postpone the summer holiday to cover staff shortage. This decision was agreed upon with the worker representative. The member brand did not cancel or reduce any orders and was lenient with delivery delays. At the outbreak of the pandemic, the member brand started daily COVID-19 monitoring at all suppliers, investigating workers' health and safety and all other COVID-19-related issues at its suppliers. This daily monitoring was paused once the infection rates declined in 2021 and the situation got more stable. In winter 2021, the monitoring system was immediately reinforced as the number of infections reached new peaks. Material delays were not a big issue in 2021 but started to highly influence the member in 2022.

Although still financially challenged, the member brand succeeded in upholding its contribution to the agreed target wages at its own factory in North Macedonia and all suppliers in Tunisia. Therefore, the factories were able to pay CBA agreed wages. The member brand was not able to increase its contribution to raising the wages to the next level but agreed to price increases related to the increase of legal minimum wages.

Despite all challenges, HAVEP showed proof of a very robust system which is incorporated throughout the whole company and could hold upright even in times of a lot of (staff) changes. Fair Wear encourages HAVEP to continue its strategy to increase the workers' wages towards target wages by setting the next steps.

## 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.	99%	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:** HAVEP buys more than 10% of its supplier's production capacity for 99% of its production volume. Even stronger, for more than 84% of the member brands' production volume, HAVEP has significant leverage of 50% - 100% at its suppliers. The member brand is aware that this high leverage is of risk as well for the member brand as for the supplier and therefore encourages its suppliers to onboard other customers. On the other hand, HAVEP also feels that high leverages contribute to relevant and sustainable improvements of the working conditions at the suppliers.

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.	3%	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:** HAVEP consolidated its supply chain significantly to reduce its Never Out of Stock (NOS) articles in the past years. In the end, only two two tail-end suppliers remained. With one supplier, the cooperation ended in 2021. The remaining supplier is in Bangladesh and makes up 1% of the member brand's production volume. Throughout 2021, the member brand experienced that the reduced NOS contributed to delivery problems. To improve this issue, some of the former tail-end suppliers will be re-activated in 2022.

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.	62%	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:** HAVEP values long-term business relationships with its suppliers. The member brand has a business relationship existing for at least five years with factories, representing 62% of its total production volume.

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.	2nd years + member and no new production locations selected	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.	N/A	2	0

**Comment:** HAVEP did not start cooperation with new suppliers in 2021.

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:** HAVEP has a strong due diligence in place. Prior to entering a new sourcing country, HAVEP carries out a country risk assessment, using external sources, such as Fair Wear country studies, NGO reports, etc, to evaluate possible risks and offset these against the resources available to conduct proper due diligence. In addition, the country risk assessment will be updated regularly. For its three production countries, HAVEP identified risks such as freedom of association and living wages for North Macedonia and Tunisia, and discrimination, child labour, living wages and excessive overtime in Bangladesh.

HAVEP has an official policy to select new factories detailing the steps that need to be taken before onboarding a new supplier. It prefers to work with factories located in Tunisia and North Macedonia, where they know about the general risks and have local offices. In internal meetings, first the need for a supplier will be discussed. When a potential new supplier is found, HAVEP's local representatives will visit the factories to discuss prices, and samples and check the labour conditions before placing the first bulk orders. HAVEP collects working condition information through various sources, including interviewing factory management, observing the work floor, collecting existing audit reports and placing a Fair Wear audit. In addition, the brand informs if worker representatives are elected and do have an active role within the factory. The working conditions of a factory are one of the criteria when choosing a supplier. The decision to approve a new factory is taken jointly between the supply chain manager, product and development, sustainability, and quality teams. HAVEP signs contracts with all suppliers. The contracts stipulate the prices and commit to future productions. HAVEP did not add new suppliers to its supplier portfolio in 2021.

In 2021, the brand and its suppliers were not highly influenced by the COVID-19 pandemic. In 2020, HAVEP initiated daily COVID-19 monitoring of all suppliers. This monitoring was paused in the first quarter of 2021 when the brand and the suppliers felt that this was not needed anymore as the situation was stable, but was re-activated immediately in winter 2021 when the number of infections reached a new peak. In this daily monitoring, the situations in the factory regarding infected workers, reduced capacities and other COVID-19-related issues were discussed with each supplier. In addition, the monitoring was supported by the brand's local staff. No factory went into lockdown in 2021. Two Tunisian suppliers postponed the summer vacation for two weeks due to a reduced workforce, as some workers were sick. This measure was agreed with the worker representatives.

**Recommendation:** Fair Wear encourages HAVEP to include freedom of association and social dialogue in its sourcing strategy. In addition, HAVEP could integrate workers' feedback into its risk assessment.

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:** HAVEP evaluates its suppliers based on a balanced scorecard principle, where factories are assessed on sustainability, quality and product development and supply chain efficiency criteria. The results of the supplier evaluation are discussed with the suppliers for improvement discussions and influence the brand's sourcing strategy for the upcoming years. In addition, suppliers are also able to hand in feedback about the brand's purchasing practices. Good suppliers are rewarded with long-term contracts and trainings. Due to internal changes at HAVEP, this assessment was not conducted in 2021 but will be reactivated in 2022.

HAVEP values long-term relationship with its suppliers and prefers to support the supplier for improvements rather than ending a relationship. However, in 2021, the brand decided to exit one Tunisian supplier as expected quality improvements were not fulfilled. In addition, the process of consolidation, which started in 2020, was continued. HAVEP followed the responsible exit strategy and informed the supplier on time. Immediately after the termination, a complaint was filed against the factory about poor communication and delayed wages. The brand followed up on this complaint immediately. For more information see indicator 3.4.

HAVEP did not reduce or cancel any orders in 2021 and no supplier reached out for financial support due to COVID-related issues.

**Recommendation:** Fair Wear strongly recommends HAVEP to carry out its supplier evaluation annually.

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:** HAVEP has a strong and long-term production planning in place. For the brand, good planning is essential, especially in times of crisis such as the COVID-19. HAVEP has a production forecast system and knows the production minutes needed per style and the capacity per supplier. The brand delivers CMT orders and also supplies the fabric and trimmings to the factories on a weekly basis. The CMT orders are distributed according to the agreed capacity and supplier's experience with each article.

There is a fixed lead time for each supplier, normally between eight to ten weeks for orders from North Macedonia and Tunisia and 20 weeks for orders from Bangladesh. These lead times already include some margin in case of late deliveries. Besides a full annual plan, the planning system provides monthly detailed production updates to the suppliers. Suppliers can make adjustments and send feedback based on real capacity availability. In case an issue is found, the system can replan immediately. In weekly meetings, the supply chain manager, planning department, sustainability and country managers discuss the order situation; the supplier's feedback is included in these discussions.

In 2021, the member brand faced material delays. To avoid production stoppage, orders were swapped depending on the availability of the material stock. Through its local teams, HAVEP was actively engaged with its suppliers and supported them where needed. The member brand was lenient with late deliveries.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.7 Degree to which member company mitigates root causes of excessive overtime.	No production problems /delays have been documented.	Some production delays are outside of the control of member companies; however there are a number of steps that can be taken to address production delays without resorting to excessive overtime.	Evidence of how member responds to excessive overtime and strategies that help reduce the risk of excessive overtime, such as: root cause analysis, reports, correspondence with factories, etc.	N/A	6	0

**Comment:** In 2021, no excessive overtime was found.

In one of the four audits, findings related to working hours, such as non-transparency, unprovided leaves and lack of policy were found. The brand's follow-up was assessed in indicator 2.4.

The brand stresses to its suppliers, that in case needed, overtime should only be voluntary and according to the legal requirements. Also, the brand's country managers and suppliers are discussing possible overtime and its discussed within the brand's internal meetings. Article and late style changes are not applicable as workwear styles remain the same for a long time period. The brand has a material stock in the Netherlands. In addition, there is a material stock for basic styles in North Macedonia and a small material stock in Tunisia. Orders are distributed with priority categories and in case needed, some articles can also be shifted from one supplier to another supplier.

**Recommendation:** As HAVEP has a well-organized own factory in North Macedonia, Fair Wear recommends HAVEP to organize supplier days. By doing so other suppliers in North Macedonia can learn from the brand's own production site and benefit from this supplier's experience. Supplier days are a good tool to connect and engage suppliers with each other. Topics such as efficient production planning, overtime and others can be discussed.

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:** HAVEP knows the production minutes per style to determine prices. The indicators for setting prices include production minutes, factory efficiency and labour costs. The labour costs are integrated into the member brands' ERP system (Enterprise Resource Planning), hence all buyers are aware of the labour costs per style. The production costs are agreed upon by signing the contracts. This practice is used for all CMT suppliers (99%), but not for RMG suppliers (1%).

In 2021, HAVEP's product development, local staff and suppliers in North Macedonia started a joint project to re-evaluate the minutes per style. The project evaluates if the calculated minutes per style are in line with the actually needed minutes in the production and costs. This project will be extended also to the brands' other suppliers in 2022, with the aim to adapt the minutes per style needed after the evaluation and to use the updated minutes for future price calculations.

The sustainability manager collects data on the production efficiency of the North Macedonian and Tunisian suppliers, the working minutes per style, overhead costs, wages being paid, legal minimum wages, CBA (collective bargaining agreement) wages, national average wages, industry wages and living wages according to Fair Wear's wage ladder. The evaluation of these data indicates the link of the buying prices to the wages, and in addition, reveals the wage gap. For the RMG Bangladesh supplier, this data is not yet available.

**Recommendation:** Fair Wear encourages HAVEP to provide its RMG supplier with training on product costing and how to quote prices including (direct and indirect) labour costs. Fair Price product owners are available to conduct such training in all Fair Wear countries.

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

**Comment:** Fair Wear audits of 2021 at two Tunisian suppliers revealed that allowances and benefits were not paid as legally required. HAVEP followed up on this finding. In both cases, the official and legal bonus was registered and paid correctly. However, the supplier paid an additional bonus to the workers, which was not correctly registered. The brand and the supplier are currently discussing possible solutions to ensure the entire bonus is paid correctly.

An audit at a North Macedonian supplier revealed findings such as inconsistent documents, incorrect payment of entitled leave and not all workers being paid legal minimum wages. The brand immediately followed up on the finding of non-payment of legal minimum wages. It turned out, that one worker did not receive legal minimum wage because of one day of absenteeism without reason, which is legally allowed. The supplier, therefore, deducted this day of the monthly salary. As a consequence, the worker did not receive a legal minimum wage for this month. According to the brand's discussion with the factory and its local country managers, the factory did act in line with the North Macedonian law. However, the brand did not verify this information with Fair Wear's North Macedonia country and the audit team. HAVEP requested payslips to cross-check the payment of legal minimum wages at this supplier and requested payment of legal minimum wages. All other findings related to wages at this supplier were monitored in the regular CAP follow-up.

As no supplier went on lockdown during 2021, the member brand did not identify legal minimum wage issues due to COVID-19. HAVEP investigated if workers on sick leave received legal minimum wages, which was confirmed.

**Recommendation:** HAVEP is highly recommended to carefully cross-check the information about the payment of legal minimum wages, especially when it comes to findings related to national and labour law. Fair Wear's local teams can support the verification of information.

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

**Comment:** There was no evidence found of late payments to suppliers by HAVEP. The member company has a payment term of 14-35 days for the North Macedonian and Tunisian suppliers. All suppliers hand in the invoices on a weekly basis. For the Bangladeshi supplier, the member brand uses a letter of credit/FOB.

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:** As described in indicator 1.8 HAVEP has detailed knowledge about the labour prices and wage gaps at all CMT suppliers. A couple of years ago, the member brand already started exploring possibilities on how to ensure and support living wages and has taken several steps since then, including conversations with its suppliers on implementing living wages, followed by price increases and Fair Wear labour costing training sessions. Target wage agreements have been made and financially supported (for more information see indicator 1.13).

In addition to discussing and supporting the payment of target wages, HAVEP is also searching for more possibilities to increase production efficiencies at its suppliers. For workwear a wide range of sizes is needed, often leading to small order quantities of less needed extra-small or extra-large sizes. In 2021 the brand started a project to reduce these small order quantities to increase production efficiency. This project will be continued in 2022.

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).	16%	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.	1	2	0

**Comment:** HAVEP owns one factory in North Macedonia.

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:** HAVEP believes in the power of social dialogue. Therefore, the target wages are aligned with the CBA (Collective Bargaining Agreement) as agreed between workers and factories. In North Macedonia, the target wage is set as the number of actual living costs estimated in the country by the Trade Unions (TU), based on two earners per family. The Fair Wear audit of 2020 at the member brand's factory confirms the payment target wages and some workers are earning even more. For Tunisia, all HAVEP production locations follow CBA remuneration schedules, which is confirmed in Fair Wear audits. The target wages are agreed upon with the suppliers, however, no agreement is fixed in a written form yet.

No supplier asked for a price increase in the past year. Due to the financial difficulties at HAVEP, as a result of the re-organization of the member brand, HAVEP was not able to support wage increases as originally defined in its wage increase plan. However, the brand did hold on to its target wage agreements and additionally agreed to a price increase of 5% for its own factory in December 2021 to cover the legal minimum wage increase. The financial strategy for HAVEP's contribution to higher wages will be revised in 2022. Therefore a business study is planned including dialogue with worker representatives. The costs to finance higher wages are covered by an increase in consumer prices and an increase in production efficiencies.



**Recommendation:** Fair Wear strongly recommends agreeing on target wages in a written agreement with all suppliers, including the RMG supplier in Bangladesh. Fair Wear encourages HAVEP to continue its efforts to support the payment of higher wages, especially in Tunisia by defining next target wages that go beyond the CBA agreements. This could be realized by a step for step implementation plan, agreed upon with the trade unions, worker representatives and suppliers. Long-term contracts for the supplier are beneficial to support this process.

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.	66%	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.	4	6	0

**Comment:** Fair Wear audits of 2020 and 2021 conducted at the brand's own factory in North Macedonia and five suppliers in Tunisia show wage levels that are according to the target wage (North Macedonia) and CBA wage level (Tunisia). These production locations represent 66% of HAVEP's total production volume.

## Purchasing Practices

**Possible Points: 44**

**Earned Points: 40**

## 2. Monitoring and Remediation

Basic measurements	Result	Comments
% of production volume where an audit took place.	100%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.		
Member meets monitoring requirements for tail-end production locations.	N/A	
Requirement(s) for next performance check		
Total monitoring threshold:	100%	Measured as percentage of production volume (Minimums: 1 year: 40%; 2 years 60%; 3 years+: 80-100%)

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

**Comment:** The sustainability manager and her colleague are designated to follow up on problems identified by the monitoring system. While the former sustainability manager left the company, the member brand took care that important Fair Wear tasks were taken over by two colleagues until the new sustainability manager took over this position a couple of months later.

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

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

**Comment:** The audit reports and CAP are shared with the supplier in a timely manner and HAVEP requires the factory management to share the reports with the worker representatives. As a standard practice, HAVEP integrates all findings of the CAP in an internal overview. With this overview, the sustainability manager can set priorities on findings, easily follow up on all findings and evaluate the progress of the CAP. In addition, an automatic integrated calculation of timelines and deadlines ensures an on-time follow-up. The brand's local teams also support the CAP follow-up. Worker representatives take part in the opening meetings and exit meetings when the audit takes place. Yet, HAVEP does not actively include worker representatives when following up on audit reports and findings.

**Recommendation:** Fair Wear recommends including worker representatives when following up on audit reports and findings to give the workers the opportunity to be informed of issues in the factory and have a voice in the prioritization of issues. HAVEP could for example add a specific feedback column for worker representatives in the CAP.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.4 Degree of progress towards resolution of existing Corrective Action Plans and remediation of identified problems.	Advanced	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.	8	8	-2

**Comment:** In 2021, two suppliers in North Macedonia and two suppliers in Tunisia were audited by Fair Wear. The brand took intensive efforts to follow up on all findings such as freedom of association and social dialogue, wages, factory management and OHS (occupational health and safety) and therefore could show proof that the majority of all findings were resolved. All improvements were verified by the local teams, in addition, proof of evidence was accurately filed on the member brand's file system.

For one North Macedonian supplier, some health and safety findings were not resolved as for this a huge investment sum is needed, which is not available yet. The supplier is now saving money to hopefully start the construction work end of 2022. Due to HAVEP's difficult situation, the brand is not able to support its supplier financially. The other North-Macedonian supplier was audited for the first time by Fair Wear. The supplier was unpleasantly surprised by all issues found and the intensity of HAVEP to work on findings. Therefore, the sustainability team decided not to overwhelm and discourage the supplier and started with step by step improvements, focusing on low hanging fruits first. This CAP showed the most open findings, however, systematic progress could be shown. For both Tunisian suppliers, almost all findings were resolved. Overall, HAVEP could show proof that also complex findings with regard to freedom of association were improved and resolved.

HAVEP identified root causes such as lack of investment and budget related to health and safety findings and freedom of association and social dialogue. As an outcome, the member brand organized a social dialogue training for its two Tunisian suppliers. This training was aimed for 2021 but was postponed to 2022 due to the COVID-19 pandemic.

**Recommendation:** Fair Wear recommends including worker representation in the remediation process. Either to engage workers in identifying and implementing improvements or to verify realised improvements. Also, Fair Wear encourage HAVEP to further explore possible root causes to include these in preventive measures.

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 2021.

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:** HAVEP collects external audit reports of its supplier in Bangladesh, which accounts for 1% of the member brand's production volume. This supplier is only used for special orders on demand, hence no regular production takes place throughout the year. The member brand only received the last audit report of October 2021 in 2022. The quality of the audit reports has been checked and the brand actively started to follow up on the findings indicated in the audit report and CAP.

**Recommendation:** Even though there is no regular production at this supplier, Fair Wear recommends to requests the audit report and CAP once the report is submitted to the supplier. This ensures an on-time follow up for all issues identified in the report. In addition, Fair Wear encourages HAVEP to integrate the CAP follow up in its overall overview of all CAPs.

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

**Comment:** Bangladesh:

HAVEP works with one factory in Bangladesh, counting for 1% of the member brand's purchasing volume. In 2021, HAVEP was not a signatory of the (International) Bangladesh Accord on Fire and Building Safety (ACCORD), but the supplier was monitored by the ACCORD. HAVEP followed up on the Corrective Action Plans by the Accord. The remediation status is 100%. In 2022, HAVEP signed the International Bangladesh Accord. The member brand is aware of the country-specific risks such as gender-based violence and discrimination, child labour, living wages and excessive overtime. However, the brand did not undertake any activity in 2021 to remediate and mitigate these risks.

Other risks:

North Macedonia and Tunisia:

HAVEP identified freedom of association as the most urgent risk to address. In North Macedonia, workers are often not aware of the function of the trade union (TU) and collective bargaining agreement (CBA) in general. In Tunisia, the right to association and collective bargaining is widely violated in the textile sector. Poor social dialogue is still a big issue which creates inequality between factory owners and their employees. Therefore, HAVEP decided to onboard two of its Tunisian suppliers for social dialogue training. Due to the COVID-19 pandemic, this training was postponed to 2022.

Viet Nam:

HAVEP cooperates with another Fair Wear brand at a shared factory in Viet Nam. This supplier was not active in 2021. However, HAVEP participated in a project about collective bargaining. This project is a joint project with a Dutch trade union (CNV international) and different brands to set up a CBA in the region and factory. The project started in 2021 and will be continued in 2022.

COVID-19:

Neither the brand nor the suppliers faced severe issues because of the COVID-19 pandemic. No supplier went in lockdown, but two suppliers in Tunisia decided to prepone the summer holiday due to lack of capacity. This decision was made in agreement with the worker representatives. The member brand initiates intensive daily monitoring of all its suppliers in 2020 but paused this monitoring in spring 2021 when the situation relaxed. This intensive monitoring was reinforced in winter 2021 once the infection rates increased. The member brand, together with its local staff, intensively followed up on the health and safety of all workers.

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:** HAVEP and two Fair Wear member brands are part of an investment company (VP capital) and actively cooperate together. In future, the cooperation will be extended. In addition, HAVEP cooperates with another Fair Wear brand at a shared factory in Viet Nam. This supplier was not active in 2021. However, HAVEP participated in a project about collective bargaining. For more information, see indicator 2.7.

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.:** N/A (N/A)

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



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

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

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

## Monitoring and Remediation

**Possible Points: 23**

**Earned Points: 20**

### 3. Complaints Handling

Basic measurements	Result	Comments
Number of worker complaints received since last check.	1	At this point, FWF considers a high number of complaints as a positive indicator, as it shows that workers are aware of and making use of the complaints system.
Number of worker complaints in process of being resolved.	0	
Number of worker complaints resolved since last check.	1	

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

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:** HAVEP has informed all factories about the Fair Wear Code of Labour Practices and the complaints mechanism. HAVEP's local team regularly checks if the Worker Information Sheets are visibly posted in the factories.

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/training not possible	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 COVID-19 restrictions in 2021 that limited the possibility to conduct training, this indicator is considered not applicable in this check.

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 + Preventive steps taken	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.	6	6	-2

**Comment:** In 2021, HAVEP received one complaint about poor communication and late payment of wages in a Tunisian factory. The complaint was filed via Fair Wear's complaint hotline shortly after HAVEP had announced the termination of cooperation with this supplier. The brand immediately followed up on this complaint. An agreement with the local trade union and factory was made to ensure on-time payment to the workers. Additionally, HAVEP paid an additional amount to ensure workers' wages for three months to support the supplier to find new customers. The payment of wages was verified, and the complaint was closed. For more information, please check Fair Wear's website. As preventive measures, HAVEP decided to raise workers' awareness about their rights and support the internal grievance mechanism in factories. Therefore the brand organized a social dialogue training for several Tunisian suppliers. Due to COVID-19, the training was postponed to 2022.

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

**Comment:** No other customers were involved in the worker complaints. HAVEP was the main buyer of the factory that received the complaint.

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## Complaints Handling

**Possible Points: 9**

**Earned Points: 9**

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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:** All HAVEP employees are informed about Fair Wear membership. General communication regarding Fair Wear audits, Brand Performance Check (BPC) results or other important themes are shared within the company via an internal platform. This platform includes four different languages to ensure that local staff can participate in the internal communication. In regular meetings and workshops, the sustainability manager informs HAVEP employees about the brands' CSR activities. The workshop sessions contain topics such as HAVEP's sustainability strategy, policies, activities and the Fair Wear membership. New colleagues participate in an introduction program; one part of this introduction program is about Fair Wear membership.

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

**Comment:** All staff in direct contact with suppliers are informed of Fair Wear requirements. There are weekly meetings with the supply chain manager, planning department, country managers and the sustainability manager to discuss the planning and sourcing strategy for factories working conditions, production issues, planning, audit follow up and living wage actions. Country managers are additionally updated by the sustainability manager by sharing relevant files from the Fair Wear member hub as well as invited to take part in Fair Wear webinars such as Country updates or the Fair Price App.

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.4 Factory participation in training programmes that support transformative processes related to human rights.	All production in low-risk countries/training not possible	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 training, 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: 3**

**Earned Points: 3**

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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:** According to the contracts HAVEP has with the suppliers, unauthorised subcontracting is not allowed. HAVEP has local staff in Tunisia and North Macedonia, which visit the production locations almost daily. HAVEP hires a consultant to visit and be present during production at the factory in Bangladesh. In 2021, four Fair Wear audits took place and no unauthorised subcontracting was identified.

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 are weekly meetings with the supply chain manager, planning department, country managers and the sustainability manager to discuss the working conditions of all suppliers. Additionally, the sustainability manager does have a weekly meeting with the CEO. In case needed, the CEO uses her power to escalate issues. All relevant staff are working closely together and information is filed on the member brands file system in a structured and transparent way.



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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:** HAVEP complies with the Fair Wear communications requirements. The brand has a B2B business, and sales go via dealers and laundry companies. In cooperation with the sustainability manager, the marketing manager ensures that the brand's dealers are informed and trained about the Fair Wear membership. HAVEP also informs about the Fair Wear membership via social media and campaigns such as Fashion Revolution Week and Fair Friday. HAVEP does not use on-garment communication to inform its customers about Fair Wear membership.

**Recommendation:** Fair Wear encourage HAVEP to use on-garment communication about the Fair Wear membership. On-garment communication is possible once a member is placed in the 'Good' or 'Leader' category.

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:** HAVEP published its supplier list, the Brand Performance Check report and the Social report on its website. In addition, HAVEP has disclosed production locations. 100% of production volume is disclosed to other members in the internal Fair Wear system and on the Fair Wear website.

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

**Comment:** The social report is submitted to Fair Wear and published on HAVEP's website.

## Transparency

**Possible Points: 6**

**Earned Points: 6**

## 7. Evaluation

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

**Comment:** The annual evaluation is done with the involvement of HAVEP's CEO and management team. The results of each Brand Performance Check, the overall membership progress, project status and focus points are discussed as part of the sustainability strategy of the company. The sustainability manager provides weekly updates to the CEO. The country managers are part of the weekly meetings and provide suppliers feedback.

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.	No requirements were included in previous Check	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.	N/A	4	-2

**Comment:** In the past year, two requirements were given:

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).

As 2.10 is only a bonus indicator and the requirement was formulated in a confusing way, this requirement is not applicable. The member brand collected an external audit of its only tailend factory in Bangladesh and could show proof of monitoring activities.

3.3 Degree to which member company has actively raised awareness of the FWF CoLP and complaints hotline.

Because of COVID-19 restrictions in 2021 that limited the possibility to conduct training, this indicator is considered not applicable in this check. Hence, the requirement is also not applicable.

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## Evaluation

**Possible Points: 2**

**Earned Points: 2**

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## Recommendations to Fair Wear

The brand values the support of Fair Wear and communication with its Brand Liaison

HAVEP feels that Fair Wear provides a lot of information which is sometimes too much and overwhelming. The brand feels it is a challenge to decide on what to focus on first.

Fair Wear's terminology about the RBC policy and HRDD policy is sometimes somewhat confusing, and the brand does not clearly know what the brand is expected to do.

Fair Wear's member hub is not user-friendly and not functioning well.

## Scoring Overview

Category	Earned	Possible
Purchasing Practices	40	44
Monitoring and Remediation	20	23
Complaints Handling	9	9
Training and Capacity Building	3	3
Information Management	7	7
Transparency	6	6
Evaluation	2	2
Totals:	87	94

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

93

### Performance Benchmarking Category

Leader

## Brand Performance Check details

Date of Brand Performance Check:

24-05-2022

Conducted by:

Annet Baldus

Interviews with:

Wilma Bloot - CEO

Laura Koedijk - Sustainability manager

Rissa den Dekker - Member of the Sustainability team

Machiel Keet - Financial department

Els de Ridder - Marketing