

# Brand Performance Check Zeeman textielSupers BV

# Publication date: June 2022

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 <u>www.fairwear.org</u>. The online <u>Brand Performance Check Guide</u> provides more information about the indicators.

#### On COVID-19

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**

#### Zeeman textielSupers BV

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

Member company information	
Headquarters:	Alphen aan den Rijn , Netherlands
Member since:	2019-10-01
Product types:	Garments, Clothing, Fashion apparel, Accessories, Home textiles, Footwear
Production in countries where Fair Wear is active:	Bangladesh, China, India, Indonesia, Turkey
Production in other countries:	Pakistan, Philippines
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	99%
Benchmarking score	72
Category	Good

## Summary:

Zeeman has met most of Fair Wear's performance requirements. A score of 72 points places the brand in the 'Good' category. Despite the pandemic, the brand monitored 99% of its suppliers through Fair Wear audits or collecting external audit reports.

#### **Corona Addendum:**

In 2021, Zeeman experienced store closures due to the pandemic again in all its selling countries. The company knew how to deal with these challenges due to earlier experiences and managed its financial stability and overall sustainability well. It continued to uphold the commitment it made at the start of the pandemic to keep all payment terms and planned orders. It experienced some financial losses but also realised that its connections to its producers and consumers are strong.

Throughout 2021 the company maintained close contact with all production locations through its agents. The biggest obstacle the company experienced was the fact that staff could not travel to production locations to discuss business and sustainability topics in person. In 2020, Zeeman identified the main human rights risks related to COVID-19 and checked them with production locations through their agents. In 2021, there was no structured way of checking in on ongoing risks, but the agents updated the company regularly on the COVID-19 situation in different production countries. As such, the company could quickly gather information on the situation in India, for example, especially related to wages.

As soon as possible, Zeeman organised Fair Wear audits at production locations. In addition, the company also organised training at production locations to follow up on audit findings. This provided the company with more insight into the situation in production locations. In addition, Zeeman used the audit findings, complaints and information from the Fair Wear country studies to develop a country-specific risk declaration form. This will be implemented in 2022 to address and discuss country-specific risks with production locations before placing orders.

In 2020, some workers in India and Bangladesh did not receive legal minimum wages during the lockdown. Zeeman calculated their part of closing, remediating this situation and paid the factories so they could pay the workers in 2021. Zeeman also reached out to other customers producing at the same production locations asking whether they would join this effort, but all declined.

At the end of 2020, Zeeman conducted a supplier survey. The outcomes that needed the company's attention were:

- Suppliers sometimes accept orders in which lead time is too short;
- The planning of Never Out Of Stock (NOOS) orders causes more negative impact than foreseen by Zeeman;
- Nearly a quarter of suppliers sometimes, regularly or always accept prices that are lower than the actual cost.

In 2021, the company used the results to evaluate its production planning and designed a new two-way Code of Conduct, which outlines the production location's responsibility and Zeeman's responsibility, explicitly related to production planning and product costing. Fair Wear especially recommends Zeeman to better understand the link between prices and wages. Zeeman will implement the two-way Code of Conduct in 2022.

## **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.	87%	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:** In 2021, Zeeman produced garments at 141 production locations. About 43 factories produce 75% of its production volume, while the remaining suppliers produce 25% of its production volume. At most of its production locations, Zeeman bought at least more than 10% of the suppliers' production capacity. As part of its strategy for the financial sustainability of suppliers, Zeeman aims not to obtain more than 50% of the production capacity of a supplier.

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.	55%	Fair Wear provides incentives to clothing brands to consolidate their supplier base, especially at the tail end, as much as possible, and rewards those members who have a small tail end. Shortening the tail end reduces social compliance risks and enhances the impact of efficient use of capital and remediation efforts.	Production location information as provided to Fair Wear.	0	4	0

**Comment:** Due to its collection, Zeeman has a large number of production locations, including 127 locations where the company buys less than 2% of its total FOB. In 2021, Zeeman again took efforts to consolidate its supply chain. Purchasers, agents and CSR staff assessed relationships with suppliers in its tail-end. Relationships with several suppliers were stopped. This resulted in fewer production locations overall, and a reduction in the production volume from production locations where Zeeman buys less than 2% of its total FOB, from 63% to 55%.

**Recommendation:** Fair Wear recommends Zeeman to consolidate its supply base by limiting the number of production locations in its 'tail end'. To achieve this, Zeeman should determine whether production locations where they buy less than 2% of their FOB and where leverage is below 10% are of strategic relevance. Shortening the tail will reduce the social compliance risks the member is exposed to and will allow the member to improve working conditions in a more efficient and effective way. It is advised to describe the process of consolidation in a sourcing strategy that is agreed upon with top management/sourcing staff.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.2 Percentage of production volume from production locations where a business relationship has existed for at least five years.	83%	Stable business relationships support most aspects of the Code of Labour Practices, and give production locations a reason to invest in improving working conditions.	Supplier information provided by member company.	4	4	0

**Comment:** Zeeman values long term relationships with its suppliers. With 95 suppliers representing 83% of Zeeman's production volume, Zeeman has had relationships for more than five years. Building long-term relationship is part of the Zeeman sourcing strategy. At the moment, the company commits to placing orders a year in advance.

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:** Zeeman has a system in place to ensure that production locations sign and return the questionnaire with the Fair Wear Code of Labour Practices before the first bulk orders are placed.

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:** Zeeman has a system in place to conduct human rights due diligence. Country risk analysis is conducted by collecting information through various sources, such as the CSR Risk Checker and Fair Wear Country studies. Furthermore, Zeeman's network of local agents plays an important role in informing Zeeman of high risks. When it comes to specific risks at suppliers, Zeeman requires suppliers to be audited.

For new suppliers, Zeeman requires factories to send their most recent audit report, not older than one year. Where possible, the agent will visit the production location to discuss labour standards and subcontracting. The outcomes of the audit report are included in its decision-making process, where relationships cannot be started with factories with severe issues. Relationships with suppliers can only be started after approval of the purchasing and CSR department.

In 2021, Zeeman developed a standardised way of collecting information on country-specific risks for India and China. These will be implemented in 2022.

In 2020, Zeeman identified the main human rights risks related to COVID-19 and checked them with production locations through their agents. In 2021, there was not a structured way of checking in on ongoing risks, but the company was regularly updated on the COVID-19 situation in different production countries through the agents. As such, the company could quickly gather information on the situation in India in April/May/June 2021, especially related to wages.

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	ο

**Comment:** In 2021, Zeeman developed a supplier evaluation methodology that includes audit results. The overview is regularly shared with buyers who are responsible for the products bought at each of the production locations. As such, compliance with the Code of Labour Practices is part of a systematic evaluation and influences purchasing decisions.

Zeeman has a clear responsible exit strategy, which is upfront communicated with production locations. When starting a business relationship the company slowly increases the production volume and when phasing out it slowly decreases production volume to ensure limited impact on the production location. In 2021, the company started to exit a few production locations in China due to high risk of forced labour.

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

**Comment:** In its buying-practices policy, Zeeman has described what type of responsible behaviour is expected from buyers when placing production, such as early order placement, limited sampling or not modifying contract terms. In 2021, it transferred its buying-practices policy into a two-way Code of Conduct, outlining expected behaviour for factories, as well as for Zeeman itself. This Code of Conduct outlines principles regarding production planning as well. The Code of Conduct will be implemented in 2022.

Zeeman works with three types of products: Never out of stock-items (NOS) which are stored, basic items that directly go to the shops (multilot) and seasonal products. Forecasts for the NOS- and multilot-items are discussed nine months in advance and orders are placed six months in advance. Seasonal products are not forecasted but orders are placed six months in advance. Zeeman includes amounts in its contracts (5%-10%) that are 'open to buy', where orders can also be placed within a shorter timeframe than 6 months. Feedback from suppliers in the survey showed that lead times could be up to 2-3 months.

Zeeman does not enforce production deadlines. It does have an overview of product deliveries deviation from the production planning but has not used this information to evaluate production capacity. Zeeman does not yet have insight in the production planning process of its factories, such as (available) production capacity, knowledge about labour minutes or peak seasons.

**Recommendation:** Fair Wear recommends Zeeman to get more information about the production planning and possible delays to understand better the impact of the Zeeman orders on factory capacity.

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

**Comment:** Zeeman learned through the audit reports that excessive overtime is an issue for many of its suppliers. The brand is generally aware of the root causes but has not identified root causes per supplier. The brand identified peak seasons, bad planning from the factory, late material deliveries and too high orders compared to available staff as potential root causes. The supplier survey also gave insight into how Zeeman's purchasing practices could pose a risk to causing excessive overtime. During the COVID-pandemic, Zeeman acknowledges that its production planning was done with more peaks and lows than usual.

In following up on audit reports, Zeeman discussed excessive overtime with its suppliers. Furthermore, the member has shared guidelines on its purchasing practices with its buyers to prevent contributing to excessive overtime. However, during the COVID-19 pandemic, Zeeman did not take extra efforts to assess to what extent its peak production was a risk of contributing to excessive overtime.

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.8 Member company can demonstrate the link between its buying prices and wage levels in production locations.	Insufficient	Understanding the labour component of buying prices is an essential first step for member companies towards ensuring the payment of minimum wages – and towards the implementation of living wages.	Interviews with production staff, documents related to member's pricing policy and system, buying contracts.	Ο	4	0

**Comment:** In 2021, Zeeman investigated the cost breakdown of its products directly with production locations and through the use of Fair Wear tools, such as Fair Price. The company also collected wage information from different countries and in different production locations. At the moment the company does not link its prices, specifically the labour cost, to wages paid in production locations.

**Requirement:** Zeeman needs to demonstrate an understanding of the link between buying prices and wage levels to ensure their pricing allows for the payment of the legal minimum wage.

**Recommendation:** Zeeman could provide agents and production locations training on product costing and how to quote prices including (direct and indirect) labour costs. Fair Price product owners can conduct such training in all Fair Wear production 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:** In 2021, Zeeman compensated workers whose wages dropped below the legal minimum wage due to lockdowns in 2020. It also actively followed up on problems identified in China regarding wage payments.

In 2021, production locations in India experience a lockdown. Zeeman has collected all necessary information about wage payment, identifying where workers did not receive the legal minimum wage. In 2022, the company will decide how to support those workers.

Two audits conducted in 2021 indicated problems with the payment of legal minimum wage. Zeeman has contacted the production locations to address the issue and received evidence that the findings were remediated.

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:** Zeeman pays all production locations within 14 days. The company continued this practice throughout the pandemic and also communicated about this publicly.

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

**Comment:** Zeeman has developed a living wage roadmap, outlining its plans for the coming years. The company has identified the wage gap for its most important production locations. It has started discussing the topic of living wages with several production locations.

**Recommendation:** Fair Wear encourages Zeeman to involve worker representatives and local organisations in assessing root causes of wages lower than living wages. It is advised that the outcomes of the root cause analysis are discussed internally and with top management to form a basis for an embedded strategy.

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.	Intermediate	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach.	Evidence of how payment below living wage was addressed, such as: internal policy and strategy documents, reports, correspondence with factories, etc.	2	6	0

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**Comment:** Zeeman is committed to raising wages at its production locations. As a target wage it uses living wage estimates as provided by the Global Living Wage Coalition in all production countries. In 2022, Zeeman aims to contribute to the target wage for one production location in each of its main sourcing countries. The company will finance this contribution from its own overall margin.

Zeeman's commitment to living wage is also included in its newly developed two-way Code of Conduct.

**Recommendation:** Fair Wear recommends Zeeman to continue the implementation of its Living Wage Roadmap.

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.	1%	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:** Zeeman has committed to paying a living wage surcharge in one of its production locations in Pakistan, responsible for almost 1% of its FOB.

#### **Purchasing Practices**

**Possible Points: 52** 

**Earned Points: 29** 

# **2. Monitoring and Remediation**

Basic measurements	Result	Comments
% of production volume where an audit took place.	99%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.		
Member meets monitoring requirements for tail-end production locations.	First or second year member and tail-end monitoring requirements do not apply	1st or 2nd year member and tail-end monitoring requirements do not apply.
Requirement(s) for next performance check		
Total monitoring threshold:	99%	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:** Zeeman has specific staff persons designated to follow up on problems identified by the monitoring system.

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

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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:** Once the company receives the audit report and Corrective Action Plan, it shares this with the relevant agent, who will contact the production location.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.4 Degree of progress towards resolution of existing Corrective Action Plans and remediation of identified problems.	Basic	Fair Wear considers efforts to resolve CAPs to be one of the most important things that member companies can do towards improving working conditions.	CAP-related documentation including status of findings, documentation of remediation and follow up actions taken by member. Reports of quality assessments. Evidence of understanding relevant issues.	4	8	-2

**Comment:** In 2021, Zeeman conducted 28 Fair Wear audits. The Corrective Action Plan is shared through the agent with the production location. In the introduction email, Zeeman indicates priority findings it expects production locations to act on first. Agents collect feedback on the Corrective Action Plan and share the response and supporting evidence with Zeeman. This is often done on a monthly basis. The CSR team double checks the responses and will ask follow-up questions. All agents support with checking documents in local languages, some address findings and remediation proactively, but not all do that yet.

During the performance check Zeeman showed remediation on a number of findings, including findings related to payments below legal minimum wage. The company has not addressed the root causes of findings yet, but has started to use audit results as input for the risk declaration form that it developed in 2021.

**Recommendation:** Fair Wear recommends Zeeman to train agents to provide more support with CAP follow-up, including addressing the root causes of findings. Fair Wear encourages Zeeman to continue strengthening their system to analyse how they might have contributed to findings and what changes they can make in their purchasing practices.

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 for all Fair Wear members.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.6 Existing audit reports from other sources are collected.	Yes and quality assessed	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.	2	3	0

**Comment:** Zeeman collects external audit reports for all production locations that have not been audited by Fair Wear. These reports were assessed on quality, and Zeeman asks for feedback on corrective actions but does not actively work on remediating the audit results.

**Recommendation:** Fair Wear recommends that Zeeman uses external audit reports to create corrective action plans, address all Fair Wear labour standards, and follow up on the audits in a similar way the company does with Fair Wear audits.

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

#### **Comment:** Bangladesh:

Zeeman signed the Bangladesh Accord and the Transition Accord. The brand could show that most of its factories had implemented safety measures and over 90% of the issues were remediated. Zeeman actively collaborates with other brands including other Fair Wear members. Gender-Based Violence remains a risk at its Bangladeshi suppliers. Zeeman therefore enrolled factories in the Fair Wear WEP Violence and Harassment Programme. Based on information from audits and complaints Zeeman is developing a risk-declaration form for Bangladesh.

#### Turkey:

Zeeman has a policy in place that allows for contracting Syrian refugees in Turkish factories. They need to be employed in line with legal standards. The brand discussed this policy with its suppliers. Factories participated in a Fair Wear seminar on Syrian refugees in 2019. Three our of five factories have been audited by Fair Wear. The audit reports did not identify the employment of Syrian refugees. One audit did identify unknown subcontracting. This issue was addressed by several people within Zeeman and the factory has been supported to restructure. Although Zeeman checks for subcontracting through its local agents and through other measures, such as through a comparison of product design and in-house services of factories the process is not yet well developed to prevent unauthorised subcontracting. In Turkey, Zeeman works with UNICEF and other brands to address children's rights around garment factories.

#### Abrasive blasting:

Zeeman has addressed abrasive blasting in its material policy that is shared and agreed upon with its production locations.

#### COVID-19:

As soon as the situation allowed, the brand started to conduct audits. In combination with information collected through the supplier questionnaire, the brand followed up on issues related to wages. The questionnaire identified several factories that had a loss of jobs. In case of non-payment of severance pay, the brand followed up. Through a steady order flow, the brand aimed to ensure a minimal loss of jobs. The brand did not check whether workers were consulted in COVID-19-related measures that were taken by factory management. The brand had included questions related to Occupational Health and Safety in its supplier questionnaire, which it also followed up. Local agents were also involved in following up. However, the brand did not actively keep track of governmental measures and whether factories were following governmental regulations. By conducting audits and collecting audit reports and through its local agents, the brand gained a better understanding of the impact of COVID-19 on its production locations, although these reports do not always include findings on the impact of the pandemic.

The brand also started to address other high risks that need remediation such as excessive overtime and forced labour in China and Gender-Based Violence (GBV) in Pakistan. In Pakistan, the brand organised two seminars to inform factory management about the risk of GBV. In India, the brand participates in a projects to prevent, identify and remediate child labour in spinning mills.

**Recommendation:** Knowing the country-specific risks facilitates the starting point for discussing this with suppliers. Member companies can agree on additional commitments that are required to mitigate risks. For Turkey, Fair Wear recommends Zeeman to take additional measures to prevent unknown subcontracting and integrate that into the monitoring system.

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:** Zeeman shares suppliers with several Fair Wear members. Zeeman showed to be open to active collaboration with other Fair Wear members to address and resolve risks and issues at suppliers.

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.	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	Ο

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Comment: Zeeman sells external brands through intermediaries. Zeeman has gathered information on the sourcing

practices and production countries of these brands.

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).	65%	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.	3	3	0

**Comment:** Some of Zeeman's external producers are Fair Wear or FLA members. Together, they account for 65% of external sales volume.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.13 Questionnaire is sent and information is collected from licensees.	Yes, and member has information of production locations	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.	1	1	0

**Comment:** Through its importers, Zeeman has a licensee agreement with Disney. It has sent the questionnaire and collected information on all production locations and has ensured that the Code of Labour Practices is posted in the production locations.

# **Monitoring and Remediation**

**Possible Points: 29** 

**Earned Points: 23** 

# **3. Complaints Handling**

Basic measurements	Result	Comments
Number of worker complaints received since last check.	3	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.	4	

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:** Zeeman has specific persons designated to address 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:** Zeeman ensures that the Fair Wear CoLP is posted at its suppliers. Agents are asked to check whether the worker information sheet is posted when they visit the factory. Furthermore, all factories are required to send in photographic evidence of posted worker information sheets. In addition, in 2021, Zeeman distributed Worker Information Cards to all its production locations and collected photographs of workers receiving these cards.

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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 for all Fair Wear members. However, Zeeman has organised WEP training at 19 production locations in 2021 accounting for 40% of FOB. Most of this training was done after an audit, to directly address some of the audit findings.

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:** Zeeman resolved three complaints from factories in Bangladesh in 2021, all related to violence and harassment. After addressing the individual complaints in line with the Fair Wear complaint procedure, Zeeman has suggested the production locations participate in the Workplace Education Programme on Prevention of Violence and Harassment. In addition, the company has included the insights from the complaints into the risk declaration for Bangladesh that was developed in 2021.

Zeeman also received a complaint from a worker at one of the Turkish production locations. This was regarding transportation, Zeeman ensured better transportation was arranged and also addressed social dialogue with the production location to ensure that future issues could be addressed through worker representatives.

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

**Comment:** Zeeman cooperated with another Fair Wear member in addressing the complaints in Bangladesh.

# **Complaints Handling**

Possible Points: 11 Earned Points: 11

# 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:** Zeeman made its staff aware of Fair Wear membership through communication on its intranet, a sustainability report and an internal poster. Staff in its stores have been made aware of Fair Wear membership. In 2021, Zeeman developed an internal training module on CSR, which includes 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:** The CSR department holds regular meetings with the Purchasing Director. Before visits to or discussions with suppliers, purchasing staff are informed of the latest status of the CAPs. Fair Wear trained the purchasing staff on the relationship between wages and prices in Zeeman's first year of membership.

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:** Spread over five countries, Zeeman makes use of seven agents. Besides having informed these agents of Fair Wear membership, these agents are also actively involved in risk assessment, collecting audit reports, discussing labour standards with suppliers and verification of improvements that are made by suppliers.

**Recommendation:** Fair Wear recommends Zeeman to further strengthen the role of agents in following up on issues identified by the monitoring system and actively train its agents on monitoring and remediating gender-related problems.

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 of conducting training, this indicator is not applicable in 2021 for all members. Zeeman has conducted the WEP on Violence and Harassment in seven factories in Bangladesh, accounting for 13% of FOB.

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



# **Training and Capacity Building**

**Possible Points: 5** 

**Earned Points: 5** 

## **5. Information Management**

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

**Comment:** Zeeman has a policy in place that allows for announced subcontracting which is also described in its responsible purchasing practices policy. To assess its environmental impact, the brand has developed a road map to identify printing and embroidery subcontractors. Also, as part of the material template Zeeman has an overview of all material production locations, covering its entire supply chain.

Zeeman assesses the risk of subcontracting by analysing its products and checking with suppliers whether all needed processes can take place in-house. Furthermore, the brand uses audit reports to identify subcontracting. In the past financial year, the company came across two unknown production units, one due to an audit and one because the company requested an updated external audit report. As soon as the production locations were identified, Zeeman ensured they received, sign and return the questionnaire and post the Worker Information Sheet.

**Recommendation:** Fair Wear recommends Zeeman to periodically check with its agents whether all known production locations are still up to date and use the information coming from questionnaires to update supplier data, including subcontractors.

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

**Comment:** The management team, CSR staff, agents and purchasers actively share information about risks and issues at suppliers with each other. However, purchasing staff does not have direct access to CAPs but are informed of the latest status before an on-site visit.

# **Information Management**

Possible Points: 7 Earned Points: 4



# 6. Transparency

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.1 Degree of member company compliance with FWF Communications Policy.	Minimum communications requirements are met AND no significant problems found	Fair Wear's communications policy exists to ensure transparency for consumers and stakeholders, and to ensure that member communications about Fair Wear are accurate. Members will be held accountable for their own communications as well as the communications behaviour of 3rd-party retailers, resellers and customers.	Fair Wear membership is communicated on member's website; other communications in line with Fair Wear communications policy.	2	2	-3

**Comment:** Zeeman actively communicates about its efforts to improve working conditions for garment workers. The brand also made public statements during the Corona crisis and about the situation of Uyghur workers in China. Zeeman communicates about Fair Wear in line with the Fair Wear Communications policy.

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

**Comment:** The brand disclosed all of its suppliers on through the Fair Wear website. The brand signed the Transparency pledge in 2019 and registered its suppliers in the Open Apparel Registry.

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

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# 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:** Zeeman's top management, including the CEO, is highly involved in all matters related to Fair Wear membership. The management team meets every six weeks to discuss CSR-related progress, issues and opportunities.

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.	60%	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 performance check, Zeeman had a requirement regarding the Covid-19 risks in China and a requirement on linking its prices to wages. The company completely addressed the first requirement and made some initial steps on the second.

## **Evaluation**

#### **Possible Points: 6**

**Earned Points: 6** 

## **Recommendations to Fair Wear**

Zeeman would like it if more retail brands join, with similar products. This would possibly increase leverage in shared

factories and as such amplify Zeeman's efforts.

Zeeman would like audit reports to be shared sooner.

Zeeman would like Fair Wear to set up a local team, including a complaints handler, in Pakistan.

# **Scoring Overview**

Category	Earned	Possible
Purchasing Practices	29	52
Monitoring and Remediation	23	29
Complaints Handling	11	11
Training and Capacity Building	5	5
Information Management	4	7
Transparency	6	6
Evaluation	6	6
Totals:	84	116

Benchmarking Score (earned points divided by possible points)

72

Performance Benchmarking Category
Good



## **Brand Performance Check details**

Date of Brand Performance Check:

26-04-2022

Conducted by:

Anne van Lakerveld