



Brand Performance Check

Rise Up Fashion GmbH

Publication date: July 2024

This report covers the evaluation period 01-01-2023 to 31-12-2023

About the Brand Performance Check

Fair Wear Foundation (Fair Wear) believes that improving conditions for apparel product location workers requires change at many levels. Traditional efforts to improve conditions focus primarily on the product location. Fair Wear, however, believes that the management decisions of clothing brands have an enormous influence for good or ill on product location conditions.

Fair Wear's Brand Performance Check is a tool to evaluate and report on the activities of Fair Wear's member companies. The Checks examine how member company management systems support Fair Wear's Code of Labour Practices. They evaluate the parts of member company supply chains where clothing is assembled. This is the most labour intensive part of garment supply chains, and where brands can have the most influence over working conditions.

In most apparel supply chains, clothing brands do not own product locations, and most product locations work for many different brands. This means that in most cases Fair Wear member companies have influence, but not direct control, over working conditions. As a result, the Brand Performance Checks focus primarily on verifying the efforts of member companies. Outcomes at the product location level are assessed via audits and complaint reports, however the complexity of the supply chains means that even the best efforts of Fair Wear member companies cannot guarantee results.

Even if outcomes at the product location level cannot be guaranteed, the importance of good management practices by member companies cannot be understated. Even one concerned customer at a product location can have significant positive impacts on a range of issues like health and safety conditions or freedom of association. And if one customer at a product location can demonstrate that improvements are possible, other customers no longer have an excuse not to act. The development and sharing of these types of best practices has long been a core part of Fair Wear's work.

The Brand Performance Check system is designed to accommodate the range of structures and strengths that different companies have, and reflects the different ways that brands can support better working conditions.

This report is based on interviews with member company employees who play important roles in the management of supply chains, and a variety of documentation sources, financial records, supplier data. The findings from the Brand Performance Check are summarized and published at www.fairwear.org. The online [Brand Performance Check Guide](#) provides more information about the indicators.

Scoring overview

Total score: 90

Possible score: 192

Benchmarking Score: 47

Performance Benchmarking Category:



Summary:

Rise Up Fashion GmbH (hereafter Oceansapart) met most of Fair Wears' performance requirements. With a total benchmarking score of 47, the member brand is placed in Good category.

In 2023, Oceanapart focused on setting new strategic direction in the past financial year, which will be implemented in 2024. The member brand's Code of Conduct, including its membership at Fair Wear, has been the centre for all conversations and decisions, and the brand has set the lines to stabilise its supplier base and improve its purchasing practices in close collaboration with its suppliers.

As a result of the new strategic direction, Oceansapart onboarded seven new suppliers in Bangladesh, Cambodia, China, the Czech Republic, Italy, Serbia, Türkiye, and Vietnam. The member brand conducted a risk scoping exercise for its production countries and part of its suppliers. However, the brand's risk scoping, action plans and monitoring need to be improved.

Oceansapart sources from four production locations in Bangladesh with a production volume of 18% of its total FOB. The member company has signed the International Accord. Oceanapart's Bangladeshi factories are all covered by the RMG Sustainability Council (RSC).

Oceansapart adapted its purchasing practices based on supplier feedback by adjusting the order planning to prevent (excessive) overtime. Additionally, the member brand set up a detailed follow-up plan with a supplier in China to improve on excessive overtime.

Implementing the new strategic direction caused changes in structures, processes and workforce. However, Oceansapart was able to keep up the level of implementing HRDD in its supply chain last year but could not show many improvements in this Brand Performance Check. It is expected that once the brand starts implementing the planned actions of its new strategic directions in 2024, more effective improvements can be shown.

Fair Wear encourages Oceansapart to follow up on the given requirements and implement the action plans outlined in the new strategic direction.

In 2023, Fair Wear implemented a new performance check methodology aligned with the OECD guidelines on HRDD. This new methodology raises the bar and includes some new indicators, which may result in a lower score for members. Because this is a transition year, Fair Wear lowered the scoring threshold for this year only.

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.

Company Profile Rise Up Fashion GmbH

Member company information

Member since: [1 Jan 2021](#)

Product types: [Sports & activewear](#)

Percentage of turnover of external brands resold [0%](#)

FLA Member [No](#)

Member of other MSI's/Organisations [Amfori - BSCI, International Accord, International Accord - Bangladesh Safety Agreement](#)

Other Initiatives [International Accord - Bangladesh Safety Agreement](#)

Number of complaints received last financial year [0](#)

Basic requirements

Definitive production location data has been submitted for the financial year under review? [Yes](#)

Work Plan and projected production location data have been submitted for the current financial year? [Yes](#)

Membership fee has been paid? [Yes](#)

Production countries, including number of production locations and total production volume.

Production Country	Number of production locations	Percentage of production volume
China	14	55.05%
Bangladesh	4	18.07%
Türkiye	3	15.79%
Viet Nam	1	4.6%
Serbia	1	3.6%
Cambodia	1	2.69%
Czechia	1	0.19%
Italy	1	0%

Layer 1 Foundational system's criteria

Possible Points: 8

Earned Points: 8

1.1 Member company has a publicly shared Human Rights Due Diligence policy that has been adopted by top management.: [Yes](#)

Comment: [Oceansapart has a Human Rights Due Diligence policy, but some elements as the inclusion of Fair Wear's eight Code of Labour Practices \(CoLP\) and a gender lens need improvement or are missing.](#)

Requirement: [Oceansapart needs to improve its Human Rights Due Diligence policy, to ensure better alignment with the OECD guidelines.](#)

1.2 All member company staff are made aware of Fair Wear's membership requirements, in particular the Fair Wear's HRDD policy and Fair Wear's Code of Labour Practices.: [Yes](#)

1.3 All staff who have direct contact with suppliers are trained to support the implementation of Fair Wear requirements, in particular the Fair Wear's HRDD policy and Fair Wear's Code of Labour Practices.: [Yes](#)

1.4 A specific staff person(s) is designated to follow up on problems identified by the monitoring system, including complaints handling. The staff person(s) must have the necessary competence, knowledge, experience, and resources.: [Yes](#)

1.5 Member company has a system in place to identify all production locations, including a policy for unauthorised subcontracting.: [Yes](#)

1.6 Member company discloses internally through Fair Wear's information management system, in line with Fair Wear's Transparency Policy.: Yes

Comment: Oceansapart discloses 100% of production locations internally through Fair Wear's information management system.

1.7 Member company discloses externally on Fair Wear's transparency portal, in line with Fair Wear's Transparency Policy.: Yes

Comment: Oceansapart discloses 100% of production locations externally on Fair Wear's transparency portal.

1.8 Member complies with the basic requirements of Fair Wear's communication policy.: Yes

Layer 2 Human rights due diligence, including sourcing strategy and responsible purchasing practices.

Possible Points: 90

Earned Points: 52

Indicators on Sourcing strategy

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.1 Member company's sourcing strategy is focused on increasing influence to meaningfully and effectively improve working conditions.	Intermediate	Fair Wear expects members to adjust their sourcing strategy to increase their influence over working conditions. Members should aim to keep the number of production locations at a level that allows for the effective implementation of responsible business practices.	Strategy document; consolidation plans, examples of implementation.	4	6	0

Comment: Oceanspart has a sourcing strategy addressing influencing labour conditions by fostering long-term business relationships, continuous dialogue with suppliers, sharing best practices, considering responsible sourcing practices, continuous risk assessment, and monitoring systems. Consolidation of the brand's supply chain is included in its sourcing strategy. Although mentioned in the brand's HRDD policy, Oceanspart's sourcing strategy does not yet explicitly focus on increasing influence through active cooperation with other clients.

The member has 26 active suppliers in China (55% FOB), Bangladesh (18% FOB), and Türkiye (16% FOB). 30% of the production volume comes from suppliers where the member has at least 10% leverage at suppliers. 4% of the production volume comes from suppliers where Oceanspart buys less than 2% of its total FOB (tail-end). Compared to the previous year, Oceanspart's 10% leverage at suppliers dropped by more than 21%. The percentage of the brand's tail-end was reduced by half.

In 2023, Oceanspart reworked its strategic directions impacting its purchasing practices. For risk-spreading and sustainability purposes, the brand will limit its sourcing in China and, therefore, started sourcing in Cambodia and Viet Nam as well as onboarded nearshore production countries such as Italy, Czech Republic and Serbia.

Recommendation: Oceanspart could include in its sourcing strategy a plan to increase influence on suppliers by cooperating with other buyers.

Fair Wear recommends Oceanspart to consider leverage when moving its production to new suppliers.

The member should consider the risk of human rights violations at suppliers, the influence it has on bringing change and the impact it can have at a factory level.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.2 Member company's sourcing strategy is focused on building long-term relationships.	Basic	Stable business relationships underpin the implementation of the Code of Labour Practices and give factories a reason to invest in improving working conditions.	Strategy documents; % of FOB from suppliers where a business relationship has existed for more than five years; Examples of contracts outlining a commitment to long-term relationship; Evidence of shared forecasting.	2	6	0

Comment: Oceanspart has a sourcing strategy that focuses on maintaining long-term relationships. 30% of the member's total FOB volume comes from suppliers with whom Oceanspart has a business relationship for at least five years. The member brand's contracts are generally untermiated, yet the contracts do not commit to long-term (3-5 years).

Oceanspart is still in the process of building up a solid, long-lasting supplier base supporting the brand's sustainability and quality requirements. As a result, the supplier base is still not stable and several suppliers have been excited and onboarded in the past year. Please see also indicators 2.5 and 3.17.

Recommendation: Fair Wear recommends Oceanspart to commit to long-term contracts and is advised to embed long-term contracts in its sourcing strategy.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.3 Member company conducts a risk scoping exercise as part of its sourcing strategy.	Basic	Human rights due diligence, according to the OECD guidelines, requires companies to undertake a scoping exercise to identify and mitigate potential human rights risks in supply chains of potential business partners.	HRDD policy; Sourcing strategy linked to results of scoping exercise; HRDD processes, including specific responsibilities of different departments; Use of country studies; Analysis of business and sourcing model risks; Use of licensees and/or design collaborations.	2	6	-2

Comment: Oceansapart conducts risk scoping on country level and factory level. For sector-level risks, such as environmental, bribery, corruption and product-level risks, the brand made a first start, but the risk scoping was not finished at the time of the Brand Performance Check. The member brand has yet to include a risk scoping on its business and sourcing model. In its risk scoping, the member has not assessed the impact and prevalence of all risks correctly. According to Oceansapart's risk assessment, there are no risks of discrimination and safe and healthy working conditions in Vietnam, while several sources indicate otherwise. Additionally, according to the member brand, there are no risks in Italy, while sources indicate differently. The risk scoping includes a gender lens. Oceansapart is a signatory of the International Accord to ensure safe and healthy working conditions at its Bangladeshi suppliers and all factories are covered by the RSC (RMG Sustainability Council).

The member brand partly adjusted its sourcing strategy based on the risk scoping. While searching for new suppliers (see also indicator 2.1) the member brand conducted a risk assessment of several countries, such as for example Cambodia, Ethiopia, Myanmar, Sri Lanka and Vietnam. Based on the assessed risks, the brand decided not to start a business in Ethiopia, Myanmar and Sri Lanka. However, despite several assessed high risks regarding Freedom of Association (FoA), living wages, discrimination and reasonable hours of work in Cambodia and Vietnam, Oceansapart started sourcing from new suppliers in both countries.

Oceansapart evaluated its extensive use of intermediaries. The evaluation showed working with intermediaries bears several risks, so the brand decided to change its business model in the future.

To date, Oceansapart's sourcing strategy does not mention a preference for countries where workers can freely form or join a trade union and/or bargain collectively. The brand's risk scoping still needs to include input from workers, suppliers and stakeholders.

Requirement: Oceansapart must reconsider the impact and/or prevalence of the risks in (country).

Recommendation: Fair Wear strongly recommends Oceansapart to include all risk factors (business model, sourcing model, sector level and product level) in its risk scoping.

Fair Wear also strongly recommends Oceansapart to privilege countries where workers can freely form or join a trade union and/or bargain collectively and make this explicit in its sourcing strategy.

The member is recommended to include input from workers, suppliers, and other stakeholders in its risk-scoping exercise.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.4 Member company engages in dialogue with factory management about Fair Wear membership requirements before finalising the first purchase order.	Advanced	Sourcing dialogues aim to increase transparency between the member and the potential supplier, which can benefit improvements efforts going forward.	Process outline to select new factories; Material used in sourcing dialogue; Documents for sharing commitment towards social compliance; Meeting reports; On-site visits; Reviews of suppliers' policies.	4	4	0

Comment: Oceansapart has a standard process for onboarding new suppliers. All relevant colleagues are aware of this process. In case the member brand is in need of a new supplier (e.g. for risk mitigation purposes or because of portfolio developments), the Head of Sourcing starts a dialogue with potential new suppliers. Topics of the first conversations are the supplier's certifications, factory assessment results, portfolio, set-up of the supplier and its factories, other customers, technical standards, research and prices. In case of a positive outcome, an Environmental, Social and Governance (ESG) assessment will be conducted, including a visit or a virtual tour through the factory. Additionally, the brand starts a dialogue with suppliers about human rights and how the supplier and Oceansapart can cooperate on this topic. Besides that, the brand checks upon the supplier's willingness to use open costing, which is a precondition. In case of a positive outcome of evaluating all collected information, including factory assessment reports, the ESG and the risk assessments, the supplier will be onboarded. In the next step, the supplier receives a set of documents: a contract, production guide, the brand's Code of Conduct (CoC), anti-bribery and anti-corruption form, Fair Wear's Code of Labour (CoLP) questionnaire and the Worker Information Sheet (WIS). The first purchasing order will only be placed after the set of documents has been signed. This process was followed for all nine suppliers onboarded in 2023.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.5 Member company collects the necessary human rights information to inform sourcing decisions before finalising the first purchase order.	Intermediate	Human rights due diligence processes are necessary to identify and mitigate potential human rights risks in supply chains. Specific risks per factory need to be considered as part of the decision to start cooperation and/or place purchasing orders.	Questionnaire with CoLP, reviewing and collecting existing external information, evidence of investigating operational-level grievance system, union and independent worker committee presence, collective bargaining agreements, engaging in conversations with other customers and other stakeholders, including workers.	4	6	0

Comment: In 2023, Oceansapart onboarded nine new suppliers in Bangladesh, Cambodia, China, the Czech Republic, Italy, Serbia, Türkiye, and Vietnam. Before onboarding new suppliers, the brand collects human rights information of potential new suppliers by conducting ESG assessments, virtual factory tours, existing factory assessments and certificates, and collecting Occupational Health and Safety (OHS) checklists. The brand's head of sourcing visited the new suppliers in Bangladesh, Cambodia and Vietnam. The new suppliers in China and Vietnam were visited by the brand's Quality control (QC) employee. The new Italian supplier, with production locations in the Czech Republic, Italy and Serbia, however, was not visited. Further, the brand informs about worker representatives at the suppliers, the procedure of instalment (elected or selected) and if a complaints mechanism is in place. Based on the outcome of the evaluation, the brand decides whether or not to onboard the potential new supplier. Oceansapart followed this process for the suppliers added in the previous year.

Although Oceansapart has a risk assessment and onboarding process in place, the brand discovered issues (quality issues and unauthorised subcontracting) with its new partner in Türkiye, leading to an exit process (see indicator 3.17).

The company does not collect information from workers or stakeholders to inform the sourcing decision. The member's sourcing strategy does not mention a preference for suppliers where workers are free to form or join a trade union and/or bargain collectively.

Recommendation: Fair Wear strongly recommends Oceansapart to always visit new suppliers before onboarding.

Fair Wear recommends Oceansapart to strengthen its onboarding process to ensure a stable supplier base.

Fair Wear encourages the member to collect worker and stakeholder input before placing the first order.

Fair Wear strongly recommends Oceansapart to privilege suppliers where workers can freely form or join a trade union and/or bargain collectively and make this explicit in its sourcing strategy.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.6 Member actively ensures awareness of the Fair Wear CoLP, the grievance mechanism, and social dialogue mechanisms within the first year of starting business.	Basic	This indicator focuses on the preliminary mitigation of risks by actively raising awareness about the Fair Wear Code of Labour Practices and complaints helpline. Discussing Fair Wear's CoLP with management and workers is a key step towards ensuring sustainable improvements in working conditions and developing social dialogue at the supplier level.	Evidence of social dialogue awareness raised through earlier training/onboarding programmes, onboarding materials, information sessions on the factory grievance system and complaints helpline, use of Fair Wear factory guide, awareness-raising videos, and the CoLP.	2	6	0

Comment: As mentioned in indicator 2.5, Oceanspart onboarded nine new suppliers in Bangladesh, Cambodia, China, the Czech Republic, Italy, Serbia, Türkiye, and Vietnam. The member brand shared information about Fair Wear's CoLP and the complaints helpline within the first year of business. The Worker Information Sheet has been posted. Oceanspart has not yet organised onboarding sessions for its new suppliers to raise awareness about the Fair Wear CoLP, the complaints helpline, or the importance of social dialogue.

Recommendation: Oceanspart is recommended to organise onboarding sessions specifically focusing on the CoLP and the grievance mechanism within the first year of doing business.

Indicators on Identifying continuous human rights risks

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.7 Member company has a system to continuously assess human rights risks in its production locations.	Basic	Members are expected to regularly evaluate risk in a systematic manner. The system used to identify human rights risks determines the accuracy of the risks identified and, as such, the possibilities for mitigation and remediation.	Use of risk policies, country studies, audit reports, other sources used, how often information is updated.	2	6	0

Comment: Oceansapart assessed human rights risks for its key production locations, and therefore, not all suppliers were included. The brand evaluated the risks according to the eight Code of Labour standards and is based on its country risk assessment, factory assessment reports, and the brand's ESG (Environmental Social Governance) assessment. The brand assessed the severity and likelihood of each risk; however, it merged both into one grading. Oceansapart prioritised the identified risks according to its zero-tolerance policy (payment of legal minimum wages, child labour, forced labour and homework) and OHS. The risk assessments per supplier are conducted in an Excel file per supplier, and each risk has its own tab. By doing so, there is no overview of the main risks, and of the main risks of the overall supplier base. The tools that Oceansapart uses for its risk assessment do not explicitly include worker, stakeholder and/or supplier input and a gender lens was not applied. Overall, the brand's supplier risk assessment needs to be improved.

Oceansapart is a signatory of the International Accord and sources from four Bangladeshi suppliers. All suppliers are covered by the RMG Sustainability Council (RSC). Oceansapart has a system to identify risks at its Bangladeshi suppliers by checking the results of the RSC factory assessments and level of improvements, conducting ESG assessments, and visiting factories.

Oceansapart's standard monitoring system mainly relies on regular factory assessments. Additionally, the brand uses questionnaires (ESG assessments) and visits as monitoring instruments, however, not all suppliers are regularly visited. Oceansapart's monitoring system does not yet identify risks in its production locations that come up in risk scoping or Fair Wears country studies, and its monitoring tools do not yet identify common non-compliances in those countries. The member brand does not have a process to adapt its monitoring in case any issues related to its zero-tolerance policy occur or in case factory assessments do not reveal common non-compliances. Furthermore, the brand's monitoring tools do not explicitly include worker, stakeholder and/or supplier input.

Requirement: Oceansapart must have a system to identify risks in its supply chain, and therefore must have a risk assessment for ALL suppliers.

Recommendation: Fair Wear strongly recommends to conduct a risk assessment for all suppliers and to apply a gender lens.

Fair Wear urges Oceansapart to approach the assessment of risk in its production locations systematically, identifying the appropriate tool and frequency depending on the outcome of the risk scoping and risk assessment.

Fair Wear recommends that Oceansapart does not depend on factory assessments alone and expand its monitoring instruments and to change its monitoring tool when it does not identify risks that are common in the production country.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.8 Member company's human rights due diligence process includes an assessment of freedom of association (FoA).	Intermediate	Freedom of association and collective bargaining are 'enabling rights.' When these rights are respected, they pave the way for garment workers and their employers to address and implement the other standards in Fair Wear's Code of Labour Practices - often without brand intervention.	Use of supplier questionnaire to inform decision-making, collected country information, and analyses.	4	6	0

Comment: Oceansapart has mapped the risks to Freedom of Association (FoA) for its production countries and can explain the main risks per country. The risks are that workers cannot freely form or join a union (Bangladesh, China, and Türkiye), worker representatives are usually selected by the management and not democratically elected (Bangladesh and China), or management mistreats workers due to their union membership or activities (Türkiye). The brand has not yet included specific risks to women workers in its risk assessment.

In the past financial year, Oceansapart created company guidance to promote FoA and collective bargaining, including possible actions. However, the actions have not yet been followed up. On supplier level, Oceansapart collected information about the election process of the worker's committees and whether these committees are active. Furthermore, the member brand informed if trade unions are active and whether collective bargaining agreement (CBA) contracts are in place and specifically discussed this topic with its suppliers. However, Oceansapart does not yet have a supplier-level monitoring in place to assess and understand the risk at suppliers.

Recommendation: Oceanspart is encouraged to deepen its understanding of risks to FoA in its supply chain.

Oceanspart is recommended to use the Supplier Questionnaire from Fair Wear’s FoA Guide to assess and understand the risk regarding violation of FoA at its suppliers.

Oceanspart should include risks specific to women workers in its risk assessment regarding FoA at its suppliers.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.9 Member company includes a gender analysis throughout its human rights risk identification, to foster a better understanding of gendered implications.	Basic	Investing in gender equality creates a ripple effect of positive societal outcomes. Members must apply gender analyses to their supply chain to better address inequalities, violence, and harassment.	Evidence of use of the gender mapping tools and knowledge of country-specific fact sheets.	2	6	0

Comment: In 2023, Oceanspart implemented a diversity strategy, covering areas such as brand, design, human resources (HR) and Human Rights Due Diligence (HRDD) in the brand's supply chain. Oceanspart has included a gender lens in its country risk assessment and understands the basic gender risks for its sourcing countries. On supplier level, the member brand used a gender lens related to harassment and wages but has not yet included a gender lens for all CoLP. Furthermore, Oceanspart started to collect the gender ratio at the management and supervisor level of worker committees and trade unions, and some data about gender pay gaps and has an overview of the gender ratio per production step. The data provided so far showed, that there is no gender wage gap related to work positions in China and supervisors are equally women or men. However, for Bangladesh, the situation is different: a gender pay gap exists, and for supervisor positions, male workers are preferred. The member did not look explicitly into how its business practices affect gender at its suppliers.

Recommendation: Fair Wear recommends Oceanspart to enroll in the Introduction to Gender Equality programme on Fair Wear’s learning platform.

Oceanspart is recommended to collect gender data per factory related to every Code of Labour Practices.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.10 Member company considers a production location's human rights performance in its purchasing decisions.	Advanced	Systematic evaluation is part of continuous human rights monitoring. A systematic approach to evaluating production location performance is necessary to integrate social compliance into normal business processes and to support good decision-making.	Supplier evaluation format, meeting notes on supplier evaluation shared with the factory, processes outlining purchasing decisions, link to responsible exit strategy.	4	4	0

Comment: Suppliers' human rights performance is evaluated systematically every year. The brand's risk assessment includes criteria such as quality, supply chain management (SCM), speed and flexibility, ESG, finance and communication. Each criterion gets a score, leading to an average score per supplier. The evaluation is discussed internally with all team members and influences sourcing decisions. All suppliers are informed about the evaluation results. Suppliers with a low score get specific attention and get time to improve. However, in case of no improvements, the brand's exit procedure will start. Well-performing suppliers are prioritised for new orders.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.11 Member company prevents and responds to unauthorised or unknown production and/or subcontracting.	Advanced	Subcontracting can decrease transparency in the supply chain and has been demonstrated to increase the risk of human rights violations. Therefore, when operating in higher-risk contexts where it is likely subcontracting occurs, the member company should increase due diligence measures to mitigate these risks.	Production location data provided to Fair Wear, financial records from the previous financial year, evidence of member systems and efforts to identify all production locations (e.g., interviews with factory managers, factory audit data, web shop and catalogue products, etc.), licensee contracts and agreements with design collaborators.	4	4	0

Comment: The member brand’s production guide and supplier contract form the legal base of the business relationship with all suppliers. Both frameworks mention that unauthorised subcontracting is not allowed. Additionally, the member takes measures to prevent unauthorised subcontracting or unknown locations, such as inquiring information about the use of possible subcontractors in its ESG assessments, production inspections conducted by the brand's quality and control (QC) employee in China and Vietnam, and making use of third-party QC inspections at its suppliers in Bangladesh and Türkiye. Furthermore, Oceanspart evaluates its supplier's capacities to ensure that the supplier can produce the orders in-house. Oceanspart responds to unauthorised subcontracting using the outcomes of its human rights monitoring. There is no evidence of missing first-tier locations in the database.

In the past financial year, Oceansapart's quality inspections uncovered unauthorised subcontracting at the brand's new Turkish supplier. Oceansapart immediately followed up on this issue by explaining the brand's policy and importance to its new supplier, collecting a factory assessment from the subcontracted production facility, and onboarding the subcontractor to its supplier base. The CoLP questionnaire was signed, and the Worker Information Sheet was posted at the subcontracting facility.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.12 Member company extends its due diligence approach to homeworkers.	Advanced	Homeworkers should be viewed as an intrinsic part of the workforce, entitled to receive equal treatment and have equal access to the same labour rights, and therefore should be formalised to achieve good employment terms and conditions.	Supplier policies, evidence of supplier and/or intermediaries' terms of employment, wage-slips from homeworkers.	4	4	0

Comment: Oceansapart's production guide and zero-tolerance policy do not tolerate homeworkers. Both documents are signed by all suppliers. Additionally, Oceansapart checks machinery, capacities, and production processes to prevent the use of homeworkers. Furthermore, the brand's QC employee in China and third-party QC in Bangladesh and Türkiye are additional monitoring tools to prevent orders from being outsourced to homeworkers. In recent years, Oceansapart has not found any homeworkers through its monitoring.

Indicators on Responsible purchasing practices

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.13 Member company's written contracts with suppliers support the implementation of Fair Wear's Code of Labour Practices and human rights due diligence, emphasising fair payment terms.	Intermediate	Written, binding agreements between brands and suppliers, which support the Fair Wears CoLP and human rights due diligence, are crucial to ensuring fairness in implementing decent work across the supply chain.	Suppliers' codes of conduct, contracts, agreements, purchasing terms and conditions, or supplier manuals.	2	4	0

Comment: Oceansapart uses contracts with its suppliers. The legal base for the brand's cooperation consists of the following documents: the contract, production guide, the brand's Code of Conduct (CoC), and anti-bribery and anti-corruption forms. All documents need to be signed by the suppliers. Amongst other, the contract stipulates payment terms and penalties for late deliveries. Liability or force majeure is not yet covered in the contract. Although mentioned in the contract, the brand rarely charges penalties for late deliveries. Its production guide, which is shared with suppliers, weakens the strict language of the contract by including that late delivery penalties will only be charged in case of proof of fault by the supplier. Payment terms are agreed individually with the suppliers and, therefore, vary from 50% after 30 days and 50% after 60 days or 30% down payments and 70% before shipment. Payments are transferred either directly to the brand's suppliers or to the brand's intermediaries. The financial check did not reveal any late payments.

Oceansapart's CoC includes the Code of Labour Practices and is not only available in English but also specifically translated into the supplier's local language to ensure a good understanding of the content. The brand's CoC supports the implementation of human rights due diligence. In the CoC, Oceansapart commits to supporting its suppliers in fulfilling the standards set out in the code.

Recommendation: Oceansapart is advised to review its contracts with suppliers against the principles mentioned in the Common Framework of Responsible Purchasing Practices (CFRPP).

Additionally, Fair Wear recommends to ensure that the contract and production guide are consistent and do not include contradictory information.

Fair Wear strongly recommends that Oceansapart remove penalties for late delivery from its contracts, or at least ensure there is 'proof of fault by the supplier' and to include terms that regulate force majeure and liability.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.14 Member company has formally integrated responsible business practices and possible impacts on human rights violations in its decision-making processes.	Intermediate	Corporate Social Responsibility (CSR), purchasing, and other staff that interact with suppliers must be able to share information to establish a coherent and effective strategy for improvements. This indicator examines how this policy and Fair Wear membership requirements are embedded within the member company.	Internal information systems, status Corrective Action Plans, sourcing score- cards, KPIs listed for different departments that support CSR efforts, reports from meetings from purchasing and/or CSR staff, and a systematic manner of storing information.	4	6	0

Comment: There is an active interchange of information between CSR and other departments to enable coherent and responsible business practices. However, important documents such as supplier risk assessments and supplier Corrective Action Plans (CAPs) are not properly filed to ensure access for all relevant colleagues.

In 2023, Oceanspart identified Key Performance Indicators (KPIs) related to supplier risk profiles, active trade unions at suppliers, OHS, CAP improvements, training, living wages, and complaints. However, these KPIs were not yet implemented. The member has not yet included responsible business practices in job role competencies.

Requirement: Oceanspart must ensure that relevant CSR information is shared with other departments within the company. Therefore, all documents must be properly and transparently filed.

Recommendation: Oceanspart could adopt KPIs that support good sourcing and pricing strategies within its sourcing, purchasing and design departments.

Oceanspart could include responsible business practices in its job role competencies of sourcing and purchasing staff.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.15 Member company's purchasing practices support reasonable working hours.	Intermediate	Members' purchasing practices can significantly impact the levels of excessive overtime at factories.	Proof that planning systems have been shared with production locations, examples of production capacity knowledge that is integrated into planning, timely approval of samples, and proof that management oversight is in place to prevent late production changes.	4	6	0

Comment: Oceansapart has 70% - 75% Never Out of Stock (NOS) articles, ensuring its suppliers receive regular orders of the same styles. The brand launches about twelve collections a year, whereof 15% - 20% are seasonal collections. The kick-off for new articles starts about ten months before production. During this time, a pre-screening of suppliers, their capacities and the decision on which supplier will get the order takes place. The product development (double sampling) lasts three months, and the lead time for production is set for 90 days, although some articles can be produced in 30 - 40 days. After production, it takes 90 days until the goods are in the warehouse. Oceansapart shares a forecast six months before the order placement and has yarn stock at several suppliers. The suppliers are involved in the production planning, and the brand takes vacation time and public holidays into account. Oceansapart does not block production capacities. Throughout the planning and production phase, the brand evaluates the status and works with a traffic light system to ensure that delays are identified on time. Suppliers report weekly to the brand about the production status. Due to the brand's NOS stock, the brand is flexible in case of delays and, in case needed, indicates priority orders. Additionally, the brand's production planning includes buffer time to prevent excessive overtime at suppliers. Delays are accepted. As the brand does not work with retailers, it uses several options to cover for delays, such as shifting campaigns on certain styles, using a virtual stock for online marketing, or starting a marketing campaign for NOS styles.

In 2022, Oceansapart discovered gaps in its planning of the production cycle. Additionally, suppliers provided feedback that Oceansapart's production planning was quite unpredictable. Therefore, a new standard operating procedure - Seasonal Critical Path (SCP) - was developed in 2023 and will be implemented in 2024. While in the past, the brand had a month by month planning, the new SCP procedure has a systematic approach to plan the entire production cycle from the very beginning (design) until the end (delivery in warehouse). Additionally, orders will be placed at an earlier stage to ensure that suppliers have more time to source the materials, and for the production. Next to that, Oceansapart will reduce its order cycles to two, summer and winter and will limit the number of articles. All articles will be placed at once. By doing so, the member brand will contribute to responsible purchasing practices and the reduction of excessive overtime. The implementation of the new production planning will be assessed in the next Brand Performance Check.

Due to a decline in sales, Oceansapart had to reduce order quantities in 2023. The brand took responsibility for covering unused materials by either using them for other orders/styles or reimbursing its suppliers. However, Oceansapart did not follow up on whether the order reductions had an impact on the suppliers or on the workers, as according to the member brand, it mostly has small Minimum Order Quantities (MOQs) and low leverages and, therefore, less impact on suppliers.

Oceansapart does not have an official process in place to systematically evaluate its production planning with its suppliers.

Recommendation: The member is encouraged to systematically evaluate with the supplier the production process after each season and to document the feedback.

Fair Wear strongly recommends Oceansapart to evaluate the effect on suppliers and workers in case of order reduction or cancellation.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.16 Member company can demonstrate the link between its buying prices and wage levels at production locations.	Basic	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, cost sheets including labour minutes.	2	6	0

Comment: Oceansapart works with an open costing model with all suppliers for all styles. The open costing sheet entails fabric details, information about costs for fabric, accessories, costs of making (CMT), prints and embroideries, labelling, testing, overhead and factory margin. The brand knows the production minutes for about 50% of its styles. The open costing does not include information about the labour costs. Generally, Oceansapart does not negotiate the CMT costs and adjusts its prices in case of legal minimum wage increase. The member brand has an overview of the legal minimum wages paid by its supplier. However, the brand has no insight into the wage levels per supplier and there is no calculation about the living wage gap. Oceansapart cannot link its buying prices to the wage levels at its suppliers.

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

Recommendation: Oceansapart is encouraged to provide buyers (or other employees involved in price negotiations with suppliers) training on cost breakdown, for example using the Fair Price app.

Oceansapart is recommended to investigate wage levels in production countries and at its suppliers. This forms the basis for ensuring enough is paid to cover at least minimum wage and for making steps towards living wages.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.17 All sourcing intermediaries play an active role in upholding HRDD and Fair Wear's Code of Labour Practices and ensure transparency about where production takes place.	Intermediate	Intermediaries have the potential to either support or disrupt CoLP implementation. It is members' responsibility to ensure production relation intermediaries actively support the implementation of the CoLP.	Correspondence with intermediaries, trainings for intermediaries, communication on Fair Wear audit findings, etc.	2	4	0

Comment: In 2023, Oceansapart used intermediaries for about 37% of its FOB. This percentage decreased by 13% compared to the previous year. The member brand has no direct contact with the suppliers covered by intermediaries. As mentioned in indicator 2.3, Oceansapart evaluated that using intermediaries bears risks and will adapt its business model in future. Oceansapart has informed its sourcing intermediaries of Fair Wear requirements and could show they informed production locations. Next to that, the intermediaries actively support the implementation of the CoLP through the follow-up of Corrective Action Plans (CAPs). Except for one intermediary, all payments are transferred directly to the suppliers. Oceansapart does not know the payment terms of the intermediary to the factory, where the brand does not pay directly.

In 2023, the member brand faced issues with its intermediaries responsible for suppliers in Bangladesh (18% FOB). There has been no support for CAP remediation and there is a lack of transparency on production planning and pricing.

Recommendation: Fair Wear strongly recommends to ensure that intermediaries actively support the implementation of the CoLP and to adapt the sourcing strategy, in case this is not happening.

The member is recommended to check if the intermediary's purchasing practices are fair and if the intermediary has adequate systems to ensure payments are made on time.

Layer 3 Prevention, mitigation and remediation

Possible Points: 80

Earned Points: 26

Indicators on the quality and coherence of a members' prevention and remediation system

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.1 Member company integrates outcomes of human rights risk identification (layer 2) into risk prioritisation and creates subsequent action plans.	Basic	Based on the risk assessment outcomes, a factory risk profile can be determined with accompanying intervention strategies, including improvement and prevention programmes.	Overview of supplier base with accompanying risk profile and follow-up programmes.	2	6	0

Comment: Based on the supplier's risk assessment, Oceanspart created an action plan per CoLP. This action plan includes follow-up tasks for factories (CAP follow-up) and some actions for the brand itself. The action plan does not include timelines and budgets, and often, the actions are not concrete or clearly defined. Furthermore, the brand has not created follow-up plans for all prioritised risks identified in its risk assessment and also not for all suppliers, as the brand's risk assessment only includes its main factories.

Oceanspart sources from four production locations in Bangladesh. The member signed the International Accord. Oceanspart only sources from factories covered under the RMG Sustainability Council (RSC).

Recommendation: Fair Wear urges the member to further complete/improve its follow-up plans.

Fair Wear strongly recommends Oceanspart to ensure all factories have a follow-up plan that matches their risk profile.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.2 Member company's action plans include a gender lens.	Basic	The prevention and improvement programmes should ensure equitable outcomes. Thus, a gender lens should be incorporated in all programmes regardless of whether or not the programme is specifically about gender.	Proof of incorporation of the gender lens in follow up programmes, including stakeholder input.	2	6	0

Comment: Oceanspart's diversity strategy includes improvement and prevention steps such as promoting female workers to leading positions, following up on payments for maternity and parental leave for workers, and following up on discrimination and sexual harassment. Furthermore, the brand plans to provide prevention training related to sexual harassment and female health in the workplace. However, Oceanspart has not yet structurally included gender in its action plans and none of the improvement and preventive steps have been implemented yet.

Recommendation: Oceanspart is recommended to extend its gender lens to all action plans and make the gender lens in its action plans more comprehensive.

Fair Wear recommends the member company to start implementing the defined steps.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.3 Member company's action plans include steps to encourage freedom of association and effective social dialogue.	Basic	Freedom of Association and Collective Bargaining are enabling rights. Therefore, ensuring they are prioritised in improvement and prevention programmes can help support improvements in all other areas.	Available prevention and improvement programmes, including stakeholder input.	2	6	0

Comment: In 2023, Oceanspart focused on promoting FoA and collective bargaining at its Chinese suppliers and included this in its action plan. The brand aims to increase the activity of the worker committees and integrate them into the decision-making process in the factory. With the help of the member brand's QC colleague, based in China, the brand will focus on improving social dialogue between factory management and workers. However, concrete action steps, timelines, and budgets still need to be defined and integrated into the action plan.

Recommendation: Fair Wear recommends Oceanspart to include steps encouraging FoA and effective SD in all action plans. Fair Wear recommends the member company to start implementing the defined steps.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.4 Member company actively supports a factory-level grievance mechanism.	Intermediate	Fair Wear’s complaints helpline is a safety net in case local grievance mechanisms do not provide access to remedy. Members are expected to actively support and monitor the effectiveness of operational-level grievance mechanisms as part of regular contact with their suppliers.	Communication with suppliers, responses to grievances, minutes of internal worker committees, evidence of democratically elected worker representation, evidence of handled grievance, review of factory policies, and proof of effective social dialogue.	4	6	0

Comment: Oceansapart systematically assesses and regularly monitors the suppliers' internal grievance mechanisms. The brand informs itself about whether suggestion boxes are in place and correctly placed to ensure workers can anonymously file a complaint. In case improvements are needed, the brand requires immediate corrections. Furthermore, Oceansapart assesses whether worker representatives are in place and whether they were selected or democratically elected. In case of a selection, Oceansapart started a dialogue with its supplier to convince the supplier about the benefits of a democratically elected worker representative committee.

Additionally, Oceansapart requests meeting minutes of worker representatives' meetings to verify whether the operational-level internal grievance mechanism is functioning. Oceansapart actively shares suppliers' best practices about functioning grievance mechanisms with other suppliers, where it is not yet the case to support the implementation process. Despite the high risks of FoA and social dialogue, Oceansapart has not yet evaluated the factory-level grievance mechanism at its new Cambodian and Vietnamese suppliers.

In 2023, Oceansapart specifically analysed the number of complaints filed by workers at its Chinese factories over the past years. The evaluation showed that almost no complaints were filed and that the internal grievance mechanism was not functioning well. In case the grievance mechanism procedure is set up, the implementation process is weak, and workers are not trained to use the internal grievance channels. The member brand started to work on drafting a best practice grievance procedure to be shared with the factory management.

Oceansapart has not yet created preventive measures by enrolling its suppliers in Workplace Education Programme training modules to support internal grievance mechanisms. Furthermore, the brand does not yet consider internal grievance mechanisms assessment in purchasing decisions.

Recommendation: Fair Wear strongly recommends Oceansapart to evaluate the factory-level grievance mechanism for all suppliers, specifically FOA and social dialogue is of high risk.

Fair Wear encourages Oceansapart to define concrete preventive and improvement steps for the actions related to its Chinese suppliers. Fair Wear recommends Oceansapart to always involve suppliers and worker representatives in the assessment of the factory-level grievance mechanism and to share and discuss the outcome of the assessment with the above stakeholders, who should be encouraged to lead a discussion on how the mechanisms can be improved.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.5 Member company collaborates with other Fair Wear members or customers of the production location.	Basic	Cooperation between Fair Wear members increases leverage and the chances of successful outcomes. Cooperation also reduces the chances of a factory needing to conduct multiple improvement programmes about the same issue with multiple customers.	Communication between different companies.	2	6	0

Comment: Oceanspart cooperates with other Fair Wear members at its shared suppliers, responding to CAPs and complaints. Oceanspart has not yet cooperated on preventive actions or with customers that are not Fair Wear members.

Recommendation: Even though Oceanspart already works together with other Fair Wear members, Fair Wear recommends to also collaborate with other customers. We recommend Oceanspart to also work together on preventing human rights violations.

Indicators on implementation: improvement and prevention

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.6 Degree of verified actions.	29%	Fair Wear expects members to show progress towards the implementation of improvement programmes. Members are expected to be actively involved in the examination and remediation of any factory-specific problem.	Progress reports on improvement programmes.	2	6	-2

Comment: In the past financial year, Oceanspart has received one Fair Wear and thirteen external factory assessment reports.

In 2023, Oceansapart created a Standard Operation Procedure (SOP) for the CAP follow-up with its suppliers. This SOP includes the process for onboarding new suppliers as well as defined steps and timelines for CAP follow-up. The CAP follow-up of all factory assessment reports, however, was fragmented. There is a lack of overview of the current status of each CAP, and there is no evaluation of progress. Moreover, in the past financial year, the member brand's CSR staff lacked staff resources to be able to properly follow-up on all CAPs, as well as documentation was also not properly filed.

The brand could show that up to two-thirds of its suppliers in Bangladesh, CAP issues have been followed up. Examples of actions that were taken include occupational health and safety, wages, overtime, discrimination, and factory communication. The CAP issues that are still open are more complex or structural and, therefore, need more time to be remediated. As the follow-up of all other CAPs could not be provided or evaluated, the score for this indicator is basic.

Oceansapart signed the International Accord and could demonstrate progress on action plans for its Bangladeshi suppliers.

Recommendation: Fair Wear strongly recommends ensuring that the size of the supply chain and the available resources of Oceansapart to actively follow up on CAP issues are coinciding. Possible solutions could be to decrease the number of suppliers or increase the resources needed to be able to work on improvement actions.

Fair Wear strongly recommends Oceansapart to improve the CAP follow-up. CAPs should be correctly stored and accessible for all related staff, and should be followed up in an organised, structured and clear way.

Fair Wear urges Oceansapart to systematically assess the progress of each CAP and link the outcome to its supplier evaluation.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.7 Degree of progress towards implementation of prevention programme.	Basic progress	Fair Wear expects members to show progress towards the implementation of prevention programmes. With this indicator, Fair Wear assesses the degree of progress based on the percentage of actions addressed within the set timeframe.	Update on prevention programmes.	2	6	-2

Comment: Oceansapart has identified some root causes of the CAP issues and discussed these with its suppliers. For example, the brand identified one root cause for OHS findings is a lack of a responsible person to follow up.

Oceansapart has not yet solved some root causes and has not yet implemented preventive actions.

Recommendation: Fair Wear recommends Oceansapart to translate its root cause analysis into concrete preventive actions as part of the risk profiles.

Fair Wear strongly recommends that the size of the supply chain and the available resources of Oceansapart to follow up on CAP issues actively coincide. Possible solutions could be to decrease the number of suppliers or increase the resources needed to work on preventive actions.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.8 Member company validates risk profile and maintains regular dialogue with factories where no action plan is needed.	No factories in the respective risk profile	When no improvement or prevention programme is needed, Fair Wear expect its member companies to actively monitor the risk profile and continue to mitigate risks and prevent human rights abuses.	Use of Fair Wear workers awareness digital tool to promote access to remedy. Evidence of data collected, worker interviews, monitoring documentation tracking status quo.	N/A	6	0

Comment: Oceansapart has no suppliers where improvement or prevention steps are not needed.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.9 Degree to which member company mitigates root causes of excessive overtime.	Intermediate	Member companies should identify excessive overtime caused by the internal processes and take preventive measures. In addition, members should assess ways to reduce the risk of external delays.	This indicator rewards self-identification of efforts to prevent excessive overtime. Therefore, member companies may present a wide range of evidence of production delays and how the risk of excessive overtime was addressed, such as: reports, correspondence with factories, collaboration with other customers of the factory, use of Fair Wear tools, etc.	4	6	0

Comment: In the previous year, nine of fourteen factory assessment reports mentioned findings related to excessive overtime. The findings relate to the brand's suppliers in China and Bangladesh. Oceanspart analysed the root causes of these findings. According to the member brand, unrealistic lead times and poor production planning in China are significant causes of excessive overtime. Additionally, in the brand's ESG assessments, suppliers reported that the Oceanaparts order planning caused delays and contributed to (excessive) overtime.

The brand responded to excessive overtime and the supplier's feedback by adapting its order planning (see indicator 2.15), coming into effect in 2024. Generally, Oceanapart is flexible when orders are delayed. For the brand's main Chinese supplier (24% FOB, 40% leverage) an action plan was implemented to follow up on this issue. The brand and supplier agreed that the supplier would onboard more workers, improve the production planning, increase efficiencies in production and ensure that workers will go home on time, establishing a process for handling unfinished goods at the end of each day, keeping overtime in low peak seasons in the limit of 36 hours and systematically reducing overtime in the peak season.

For all other Chinese suppliers with excessive overtime, Oceansapart discussed these with the factory management. However, no concrete action plans were created. Oceansapart collaborates with another Fair Wear member brand to follow up on excessive overtime found at its Bangladeshi supplier.

Oceansapart did not follow up on the excessive overtime findings from 2022 at its Turkish supplier as the cooperation has paused until the new production facility of the Turkish supplier is ready.

Oceansapart could not yet show that its efforts resulted in reduced excessive overtime at all related suppliers.

Recommendation: Fair Wear encourages to expand its follow-up on excessive overtime done at its main Chinese suppliers to all suppliers where excessive overtime occurs.

Fair Wear advises Oceansapart to discuss with its supplier which solutions included in the Fair Working Hours Guide are applicable.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.10 Member company adequately responds if production locations fail to pay legal wage requirements and/or fail to provide wage data to verify that legal wage requirements are paid.	Intermediate	Fair Wear members are expected to actively verify that all workers receive legal minimum wage. If a supplier does not meet the legal wage requirements or is unable to show they do, Fair Wear member companies are expected to hold the management at the production location accountable for respecting local labour law.	Complaint reports, CAPs, additional emails, Fair Wear Audit Reports or additional monitoring visits by a Fair Wear auditor, or other documents that show the legal wage issue is reported/resolved.	2	4	-2

Comment: Seven of fourteen factory assessment reports mentioned findings related to legally required wage components, such as incorrect payment of overtime hours and social security bonuses (suppliers in Bangladesh) and inadequate social insurance coverage (suppliers in China).

Oceanspart followed up on the findings of its suppliers in Bangladesh (9% FOB), and proof of evidence showed that the factory paid all due amounts to the workers. Further, the brand's QC employee discussed the inadequate social insurance coverage with the Chinese factory managers (in total 30% FOB). Here, no progress could be shown. According to Oceanspart, factory management and workers are in need of training to understand the importance and benefits of social insurance. However, no training was organised in the past financial year.

In the past Brand Performance Check, Oceanspart got an insufficient score for this indicator due to inadequate follow-up on findings of payment of legal minimum wages during a COVID-19 lockdown at a Chinese supplier. The brand tried to follow up on the given requirement to ensure that all workers receive their due payments retroactively. The agent and factory stated that all workers had been paid correctly during the lockdown and handed in proof of evidence. However, this proof of evidence was insufficient, as it did not show the wages for 1/3 of the workers. The brand requested evidence for the payments of these 1/3 workers. Unfortunately, the brand's agent and the factory were not cooperative and did not provide the requested documents. Due to the uncooperativeness of the agent and factory, the member brand decided to exit this supplier and significantly reduced the order quantity in 2023 to slowly phase out. The final exit took place beginning of 2024. However, this means that this issue remains unresolved.

In the past financial year, Oceanspart followed up on the legal minimum wage increase in Bangladesh and verified through factory assessments if all suppliers followed the new legislation. The member brand did not follow up on the effect of the rampant inflation in Türkiye on its suppliers and workers.

Requirement: If a supplier fails to comply with legal wage regulations, members are expected to respond in time, identify root causes with factory management, and resolve that local labour laws are respected. Evidence of remediation must be collected.

Recommendation: Fair Wear strongly recommends Oceanspart take more active steps to solve the legal minimum findings at the Chinese suppliers. An action plan, including training, should be set up, followed up, and closely monitored. Additionally, Oceanspart is recommended to cooperate with other member brands to discuss successful follow-up on similar findings.

Fair Wear recommends Oceanspart that top-level management discusses all issues regarding legal minimum findings with the factory to strengthen the QC's position within the factory and to support the QC in the follow-up.

Fair Wear strongly recommends Oceanspart to ensure problems of payments below legal minimum wages are prevented going forward and remediated retroactively.

Fair Wear strongly recommends Oceanspart to follow up on the effect of the rampant inflation at its Turkish suppliers.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.11 Degree to which member company assesses and responds to root causes of wages lower than living wages in production locations.	Basic	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.	Member companies may present a wide range of evidence of how payment below living wage was addressed, such as: internal policy and strategy documents, reports, wage data/wage ladders, gap analysis, correspondence with factories, etc.	2	6	0

Comment: Oceanspart monitors its suppliers' compliance regarding payment of legal minimum wages and wages agreed upon in labour contracts or via Collective Bargaining Agreements (CBAs). The monitoring includes an overview per country and supplier of the legal minimum wages and the living wage estimates. Based on factory assessment reports, for some suppliers, the brand has insight into the average worker's wages. Oceanspart does not yet know the wage levels per supplier and has not yet calculated the living wage gap. The member brand started discussing living wages with its suppliers and investigated how they calculate the living wage and which living wage estimates are used. Oceanspart has not yet conducted a thorough root-cause analysis for wages lower than a living wage, but according to the member brand, one root cause is that production with low wages supports the economy.

Requirement: Oceanspart must assess the root causes of wages that are lower than living wages, taking into account its leverage and the effect of its own pricing policy. Oceanspart is expected to take an active role in discussing living wages with its suppliers. The Fair Wear wage ladder can be used as a tool to implement living wages, to document, monitor, negotiate and evaluate the improvements at its suppliers.

Recommendation: Fair Wear encourages Oceansapart to discuss with suppliers about different strategies to work towards higher wages and develop a systemic and time-bound approach. It is advised to start with suppliers where the member is responsible for a large percentage of production and has a long-term business relationship.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.12 Member company determines and finances wage increases.	Insufficient	Member companies should have strategies in place to contribute to and finance wage increases in their production locations.	Analysis of wage gap, strategy on paper, demonstrated roll out process.	0	6	0

Comment: Oceansapart has started to address the topic of living wage internally, by setting up a strategy and defining the core team. The strategy to tackle the topic of living wages and defined two key indicators: adjustment of contracts and payment terms as well as understanding the link between the prices and wage levels. Therefore, the brand's buying, merchandising and finance team will work on responsible purchasing practices and as well as building up capacity regarding Fair Wear's Fair Price App. The implementation of the brand's new strategy will take place in 2024 and will, therefore, be evaluated in the next Brand Performance Check.

Oceansapart does an overview of wages paid for some of its production locations. Oceansapart has not discussed wage increases with its factories. The brand's strategy focuses first on internal processes such as pricing and contracts as well as capacity building to link the buying prices to wage levels. The strategy does not yet include on how to finance wage increases at the brand's suppliers. The implementation of the brand's new strategy will take place in 2024 and will, therefore, be evaluated in the next Brand Performance Check.

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

Recommendation: To support companies in analysing the wage gap, Fair Wear has developed a calculation model that estimates the effect on FOB and retail prices under different pricing models.

Fair Wear recommends Oceansapart to enrol in the Living Wage programme on Fair Wear's learning platform.

It is advised that the strategy for how to finance wage increases is agreed upon by top management.

In determining what is needed and how wages should be increased, it is recommended to involve worker representation.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.13 Percentage of production volume where the member company pays its share of the living wage estimate.	0%	Fair Wear requires its member companies to act to ensure a living wage is paid in their production locations to each worker.	Member company's own documentation such as reports, factory documentation, evidence of Collective Bargaining Agreement (CBA) payment, communication with factories, etc.	0	6	0

Comment: Oceanspart does not contribute to higher wages at any of its production locations.

Requirement: Oceanspart is expected to begin setting a target wage for its production locations.

Recommendation: Oceanspart is strongly recommended to contribute to a systematic wage increase in its production locations.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.14 Member addresses grievances received through Fair Wear's helpline in accordance with the Fair Wear's Access to Remedy Policy.	No complaints received	Members are expected to actively support the operational-level grievance mechanisms as part of regular contact with their suppliers. The complaints procedure provides a framework for member brands, emphasising the responsibility towards workers within their supply chain.	Overview of supporting activities, overview of grievances received and addressed, etc.	N/A	4	-2

Comment: Oceansapart received no complaints in the past financial year.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.15 Degree to which member company implements training to address the risks identified.	Insufficient	Training programmes can play an important role in improving working conditions, especially for more complex issues, such as freedom of association or gender-based violence, where factory-level transformation is needed.	Links between the risk profile and training programme, documentation from discussions with management and workers on training needs, etc.	0	6	0

Comment: Oceansapart has some CAP findings where training is a recommended follow-up action. Oceansapart's follow-up plan does include the implementation of training as part of its improvement or preventive programme; however, no supplier was enrolled in any training in the past financial year.

Furthermore, the brand has not enrolled any of its suppliers in training modules to raise awareness about Fair Wear's Code of Labour Practices and workers' rights.

Requirement: Oceansapart needs to follow up on CAP findings that show workers are not aware of the Code of Labour Practices by enrolling those suppliers in an appropriate training module.

Recommendation: The member is recommended to implement training for all factories where this is part of its action plan.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.16 Degree to which member company follows up after a training programme.	Member company did not implement any training	Training is a crucial tool to support transformative processes but complementary activities such as remediation and changes at the brand level are needed to achieve lasting impact	Evidence of engagement with factory management regarding training outcomes, documentation on follow-up activities, and proof of integration into further monitoring and risk profiling efforts.	N/A	6	0

Comment: Oceanspart did not implement training at its suppliers.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.17 The member company's human rights due diligence system includes a responsible exit strategy.	Intermediate	Withdrawing from a non-compliant supplier should only be the last resort when no more impact can be gained from other strategies. Fair Wear members must follow the steps as laid out in the responsible exit strategy.	Exit strategy policy, examples of supplier communications.	2	4	0

Comment: Oceansapart’s human rights risk monitoring includes a responsible exit strategy. In 2023, the member brand stopped cooperation with nine suppliers in Bangladesh, China and Türkiye. The reasons for ending the business relationship were ending cooperation with the agent and supplier base consolidation (see also indicator 2.1). For some suppliers, the cooperation ended on mutual agreement or on request of the supplier due to low Minimum Order Quantities (MOQs) by the member brand. The brand's leverage at all terminated suppliers was between 1% and 2% (four factories), 5% (four factories) and 10% (one factory). The member followed the steps in the responsible exit strategy and informed itself about the effect of the exit on the factory and workers for all Chinese suppliers. Oceansapart did not follow up on the effect of its exit for its suppliers in Bangladesh and Türkiye (1% - 5% leverage), as the termination was mutually agreed upon or initiated by the supplier and the brand's low leverage.

Oceansapart has not yet discussed the responsible exit strategy with all of its suppliers.

Recommendation: Oceansapart is strongly recommended to always follow up on the effect of ending collaboration with a supplier, regardless if the termination was initiated by the supplier and regardless of the brand's leverage.

Oceansapart could discuss the responsible exit strategy with its suppliers, for instance as part of its supplier evaluation.

Oceansapart could include the responsible exit strategy as part of its suppliers' agreement or contract

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.18 Member company’s measures, business practices and/or improvement programmes go beyond the indicators or scope.	Member company’s activities do not go beyond the indicators or scope.	Fair Wear would like to reward and encourage members who go beyond the Fair Wear policy or scope requirements. For example, innovative projects that result in advanced remediation strategies, pilot participation, and/or going beyond tier 2.	Overview of Human Right risk monitoring, remediation and prevention activities and processes.	N/A	6	0

Comment: Oceansapart does not undertake activities related to human rights that go beyond Fair Wear's scope.

Layer 4 External communication, outreach, learning, and evaluation

Possible Points: 22

Earned Points: 12

Indicators related to communication

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.1 Member company actively communicates about Fair Wear membership.	Intermediate	Fair Wear membership includes the need for a brand to show its efforts, progress, and results. Fair Wear members have the tools and targeted content to showcase accountability and inform customers, consumers, and retailers. The more brands communicate about their sustainability work, the greater the overall impact of the work of the Fair Wear member community.	Member website, sales brochures, and other communication materials.	2	4	0

Comment: Oceanspart communicates accurately about Fair Wear membership on its website. The member does not yet use other channels to inform customers and stakeholders about Fair Wear membership.

Recommendation: Oceansapart could develop materials about Fair Wear membership to share with retailers and (web)shops. The Fair Wear third-party resellers flyer can support in explaining Fair Wear, Fair Wear’s work and the communication rules for third parties.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.2 Member company sells external brands with a Human Rights Due Diligence system (if applicable).	No reselling of external brands	Some member companies resell other brands, which Fair Wear refers to as 'external production'. These members are expected to investigate the Human Rights Due Diligence system of these other brands, including production locations and the availability of monitoring information.	External production data in Fair Wear’s information management system, collected information about other brands’ human rights due diligence systems, and evidence of external brands being part of other multi-stakeholder initiatives that verify their responsible business conduct.	N/A	4	0

Comment: Oceansapart does not sell external brands.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.3 Human rights due diligence reporting is submitted to Fair Wear and is published on the member company's website.	Advanced	The social report is an important tool for member companies to share their efforts with stakeholders transparently. The social report explicitly refers to the workplan and the yearly progress related to the brands goals identified in the workplan.	Social report.	4	4	0

Comment: Oceansapart has submitted its social report, which Fair Wear approved. Oceansapart has also published the report on its website.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.4 Member company engages in advanced reporting activities.	Intermediate	Good reporting by members helps ensure the transparency of Fair Wear's work and helps share best practices within the industry. This indicator reviews transparency efforts reported beyond (or included in) the social report.	Brand Performance Check, audit reports, information about innovative projects, specific factory compliance data, disclosed production locations (list tier 2 and beyond), disclosure of production locations, alignment with the Transparency Pledge.	2	4	0

Comment: Oceanspart published its social report, which includes some factory-level data and remediation results, on its website. Oceanspart has yet to disclose time-bound prevention, remediation and mitigation actions.

Recommendation: Fair Wear recommends Oceanspart to publish concrete remediation action for its suppliers.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.5 Member company has a system to track implementation and validate results.	Intermediate	Progress must be checked against goals. Members are expected to have a system in place to track implementation and validate the progress made.	Documentation of top management involvement in systematic annual evaluation includes meeting minutes, verbal reporting, PowerPoint presentations, etc. Evidence of worker/supplier feedback.	4	6	0

Comment: Oceanspart has a system to track progress and check if implemented measures have been effective in preventing and remediating human rights violations; however, the system needs to be improved. The internal evaluation system involves top management. The member does not yet include triangulated information from external sources in its evaluation system.

Recommendation: Fair Wear recommends to systematically evaluate the progress and effectiveness of its prevention and improvement programmes.

The member is advised to include feedback from workers and suppliers in its evaluation system.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.6 Level of action/progress made on requirements from previous Brand Performance Check.	Basic	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 should show documentation related to the specific requirements made in the previous Brand Performance Check.	0	4	-2

Comment: The previous performance check included ten requirements regarding HRDD policy (indicator 1.1), wages (indicators 2.16, 3.10-3.13), gender lens in the brand's action plan (indicator 3.2) and FoA in the brand's action plan (indicator 3.3), implementation of training (3.15) and advanced reporting (indicator 4.4).

Oceansapart started following up on some indicators, such as 3.2, 3.3, 3.10, and 4.6. Together, less than half of the requirements were addressed.

Recommendation: Oceansapart is strongly recommended to address the requirements that are still outstanding.

5 Appreciation chapter

5.1 Member company publicly responded to problems/allegations raised by consumers, the media, or NGOs.: [Not applicable](#)

5.2 Member company actively participated in lobby and advocacy efforts to facilitate an enabling environment in production clusters.: [Not applicable](#)

5.3 Member company actively contributed to industry outreach, visibility, and learning in its main selling markets.: [Not applicable](#)

Recommendations to Fair Wear

Oceansapart experiences Fair Wear's member hub with the HRDD facilitation tool as challenging. According to the member brand, it is difficult to focus, and the supplier's risk assessment is overwhelming and makes it feel like it is impossible to comply with it. There is a lack of support regarding prioritization. Moreover, the systems influence the brand's internal processes, causing more chaos. On the other hand, the brand values Fair Wear's country updates and country risk assessment as a helpful tool. The brand experienced that Fair Wear's HRDD facilitation tool helps to focus on all risks and realised that internal structures need to be reorganized.

The member brand finds the topic of living wage challenging. According to the brand, there is a lack of step-by-step guidance, and the guidance provided is not clear.

Brand Performance Check details

Date of Brand Performance Check: **28-05-2024**

Conducted by: **Annet Baldus**

Interviews with: **Mrs Silvana Bornello - CEO**

Mrs Agnieszka Piechnik - Head of Sourcing

Mrs Lisa Sauerborn - Junior Sustainable Product and Compliance Manager

Mrs Nadya Slonskaya - Senior Sustainable Product and Compliance Manager

Mrs Stephanie Will - Senior Financial Officer