Brand Performance Check

Stanley and Stella S.A.

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: 136
Possible score: 190
Benchmarking Score: 72
Performance Benchmarking Category: Leader



Foundational system's criteria	Sourcing strategy	Identifying continuous human rights risks	Responsible purchasing practices	Quality and coherence of prevention and remediation system	Improvement and prevention	Communication, transparency and evaluation
100%	64%	67%	92%	80%	63%	73%

Summary:

Stanley and Stella has shown advanced results on performance indicators and has made exceptional progress. With a total benchmarking score of 72, the member is placed in Leader category.

Stanley and Stella has a sourcing strategy that focuses on maintaining long-term relationships with its main suppliers in Bangladesh and China. The brand conducts comprehensive risk assessments covering country, sector, product, sourcing, and business model risks. In Bangladesh, this includes monitoring elevated risks due to political unrest, such as wage non-payment, overtime, and health and safety issues. At the factory level, Stanley and Stella systematically identifies human rights risks and links them to specific action plans that incorporate worker and stakeholder feedback. The local offices in sourcing countries enable ongoing HRDD monitoring and implementation at production sites.

Stanley and Stella sources from eleven production locations in Bangladesh with a production volume of 97% of its total FOB. The member company has not signed the International Accord. Ten factories are covered under Ready-made garments Sustainability Council (RSC). One factory falls out of the RSC's scope and Stanley and Stella initiated a third-party audit on fire and building safety in 2021 and is in the process of organising another. The brand started to collaborates with other brands under the Accord to mitigate and address human rights risks. However, Stanley and Stella does not financially contribute to RSC activities and therefore does not meet Fair Wear's Enhanced Human Rights Due Diligence Policy for fire, structural and electrical safety in Bangladesh.

The brand has detailed knowledge of the labour costs of its prices and labour costs are non-negotiable in price setting. Currently, Stanley and Stella are analysing the gap between current wage levels and the living wage standard. Based on this analysis, the brand plans to develop a long-term strategy to raise wages across production locations.

To address overtime issues, the brand’s has set up an overtime check at factory level. Quality assurance officers track working hours at each factory, immediately addressing any excessive overtime cases. Through its production planning the brand also aims to minimize excessive overtime, for example through being flexible with lead times when delays happen and by working with a lot of repeat orders which allows for high efficiency.

In 2023, one of Stanley and Stella's factories closed due to financial issues, impacting workers' wages. Alongside other Fair Wear members, the brand continues advocating for the affected workers’ payment.

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 member brands. Because of this transition, Fair Wear temporarily lowered the scoring threshold.

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 Stanley and Stella S.A.

Member company information

Member since: 15 Dec 2011
Product types: Garments, clothing, fashion apparel, Promotional wear and accessories, Bags and Accessories
Percentage of turnover of external brands resold 0%
Member of other MSI's/Organisations GOTS, Peta, OEKOTEX and Textile Exchange
Number of complaints received last financial year 15

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

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

Production Country	Number of production locations	Percentage of production volume
Bangladesh	11	96.7%
China	1	3.31%

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: Stanley and Stella has a solid Human Rights Due Diligence policy in place.

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: Stanley and Stella 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: Stanley and Stella 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: 78
Earned Points: 58

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: Stanley and Stella has a sourcing strategy addressing influencing labour conditions. The brand is in the process of formalising this sourcing strategy into a written down policy. However, the principals of its sourcing strategy is known and implemented throughout the organisation.

The member has 12 active suppliers. 91% of the production volume comes from suppliers where the member has at least 10% leverage at suppliers. 1% of the production volume comes from suppliers where Stanley and Stella buys less than 2% of its total FOB. .
This is an improvement compared to the previous year. The brand has a policy of not having more than 30% leverage at one supplier location, nor giving one supplier more than 25% of its FOB as not to create dependencies. Of the 12 suppliers, 11 are based in Bangladesh and one is located in China. In Bangladesh, a team of five people oversees all HRDD implementation, while in China, they work with a local operation manager.

Stanley and Stella's sourcing strategy explicitly focuses on increasing influence through consolidation and in 2023, the brand also started to active explore collaboration opportunities with other clients in its factories.

Recommendation: Stanley and Stella should formalise its sourcing strategy by combining several documents into one formal strategy.

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: Stanley and Stella has a sourcing strategy that focuses on maintaining long-term relationships. 61% of the member's total FOB volume comes from suppliers with whom Stanley and Stella has a business relationship for at least five years. The brand has contracts in the form of 'General Terms and Conditions' with its suppliers that outline the minimum order quantities (MOQs) for each style the brand agrees to purchase, along with the corresponding lead times. This list is reviewed and updated every six months in line with these agreements. The General Terms and Conditions do not explicitly address the duration of the contract between Stanley and Stella and its supplier, but it is understood to be ongoing. Since the contracts do not specify a specific duration, the brand has not made a formal commitment to long-term contracts.

Recommendation: Fair Wear recommends Stanley and Stella to commit to long-term contracts.

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.	Intermediate	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.	4	6	-2

Comment: Stanley and Stella conduct risk scoping and include all risk factors, including country, sector, product level, sourcing model and business model risks. For each sourcing country, the brand has scoped the potential harms on all OECD sector risks, including the eight labour standards, rating them on a scale of low, medium, or high. These sector risks are also assessed in context of their production process in the sourcing countries.

The brand bases its assessments on desk research, drawing from multiple sources such as international indices, reports, and resources from organisations like Fair Wear. Input from workers, suppliers, stakeholders is included in the risk scoping by including information from Fair Wear country profiles and onsite assessments. In addition the local teams of the brand provide feedback on the risk scoping to ensure accuracy of the scoring.

In its risk scoping, the member has assessed the impact and prevalence of the risks correctly. In Bangladesh, the brand also included heightened risks related to recent political unrest, particularly regarding wage non-payment, overtime, and health and safety issues. In China, key risks such as forced labor, excessive working hours, and restrictions on freedom of association were flagged as high. In both sourcing countries the risk on gender discrimination and gender based-violence is assessed, however the brand has yet to include a more comprehensive gender lens in its risk scoping for all other labour standards.

Separate from the country risk scoping, Stanley and Stella assessed their sourcing model and business model risks. Here, for example, they identified lower risks due to their strong local presence in Bangladesh. Furthermore, they identified new potential risks related to introducing new product lines in unfamiliar markets.

The member adjusts its sourcing strategy based on the outcome of the risk scoping. For example, Stanley and Stella is in the process of exploring several new sourcing countries. The decision to pursue certain countries over others was driven by the risks identified in the pre-sourcing risk scoping exercise they carried out for each country.

While freedom of association (FOA) risks are included in the risk scoping, the brand's sourcing strategy does not prioritise countries where workers can freely form or join trade unions or bargain collectively. According to the brand, this is because FOA-related challenges exist in all of their potential sourcing countries.

Recommendation: Fair Wear strongly recommends Stanley and Stella 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.

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: In 2023, Stanley and Stella adjusted its onboarding process, ensuring the earlier inclusion of headquarters when selecting a new supplier. The brand has defined a comprehensive step-by-step onboarding process. It is the standard process for Stanley and Stella to inform new suppliers about its HRDD policy and Fair Wear membership by sharing its Code of Conduct. In addition, as part of the onboarding process, the local team will visit the factory several times to assess the factory on their sustainability and human rights performance and to engage in dialogue on how the factory and Stanley and Stella can cooperate on this topic.

In 2023, the brand has followed this process for two new supplier who are still in the onboarding process. These supplier are added the brand's financial year of 2024.

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.	2nd+ year member and no new production locations selected.	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.	N/A	6	0

Comment: In the previous financial year, Stanley and Stella has not added any new suppliers.

However, it is standard process for Stanley and Stella to collect human rights information of potential new suppliers by asking suppliers to do a self-assessment, collecting third party information and existing audit reports. Afterwards, the brand conducting an onsite factory risk assessment, in which they go through all risk related to the OECD risk factors, including the eight Code of Labour Practices. The company collects information from workers to inform the sourcing decision. Stanley and Stella checks whether the factory has an internal grievance mechanism and a worker committee and it checks the meeting minutes of the worker committee meetings. The brand only moves forward with factories that meet their mandatory requirements. 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 Stanley and Stella 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.	No production locations in the first year of business.	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.	N/A	6	0

Comment: In the previous financial year, Stanley and Stella has not added any new suppliers.

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.	Insufficient	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.	0	6	0

Comment: Stanley and Stella has a systematic approach to assessing human rights risks in its supply chain and has assessed the risks for each production location. It has identified the right tool and frequency per country. For instance, the brand assesses human rights risks in its production locations in Bangladesh through several monitoring tools including, daily visit by the quality control officers who monitors on overtime through their daily overtime tracker, monthly visit by the sustainability operation team who then completes a monthly sustainability observation report, Fair Wear onsite assessments and third party audits, a quarterly factory risk assessment through their Sustainability Audit reports (SARs) and quarterly supplier evaluation through their Supplier Sustainability Scorecards (SSSs).

All the factory-level risk information is collected in the brand's SARs. These reports assess the risk of harms on all OECD sector risks. Each risk is given a severity score, based on country risk scoping, and a likelihood score, determined by factors such as factory self-assessment questionnaires, corrective action plan (CAP) results, audit findings, and root cause analyses. These scores are combined to create an overall factory risk assessment for every human rights risk. The resulting scores are then compiled into an overall SAR score, which is included in the quarterly Supplier Sustainability Scorecards. This allows the brand to evaluate and compare their suppliers' performance across multiple metrics.

Stanley and Stella enrols its suppliers in Fair Wear onsite assessment every three years, however the brand is now looking into a more risk based approach where they organise audits based on the risk identified in their factory risk assessment. Next to its systematic approach, the brand ensures it uses different tools that include input from workers, suppliers, and other stakeholders. This includes enrolling suppliers in Fair Wear onsite assessments and in the brand's quarterly SARs feedback from through worker interviews and worker surveys, in addition the worker representatives is included in all audit closing meetings.

Regarding the Enhanced Human Rights Due Diligence Policy for fire, structural and electrical safety in Bangladesh. Stanley and Stella sources from Eleven production locations in Bangladesh. The member has not signed the International Accord. Ten of its factories are covered by the RMG Sustainability Council (RSC), and one factory falls out of the RSC's scope. The brand stays informed of the audits and monitoring activities carried out by the RSC, and includes this information in their own monitoring reports. One factory falls out of the RSC's scope and Stanley and Stella initiated a third-party audit on fire and building safety in 2021 and is in the process of organising another. The brand has reached out to other member brands active in their factories who are signatory of the accord to look into collaborate on preventing, mitigating and remediation human right risks. Besides normal CAP follow-up on RSC audits, the brand does not financially contribute to what is required from the RSC activities.

Stanley and Stella is in the process of applying the same monitoring process it follows in Bangladesh to its Chinese supplier. Their local CSR manager monitors the supplier regular to collect the information for the SAR and the supplier is enrolled in Fair Wear onsite assessments.

Requirement: Stanley and Stella must adhere to the requirements of the 'Enhanced Human Rights Due Diligence Policy for fire, structural and electrical safety in Bangladesh' in its due diligence process. In accordance with the policy, the member must be able to demonstrate collaboration on prevention, mitigation and remediation with the signatories of the International Accord, as well as proof of actual (financial) contribution to what is required from the RSC activities for all its production locations in Bangladesh.

Please note that following Fair Wear's policy for repeated non-compliance, members who receive an insufficient score on this indicator for the second year in a row will be placed in the 'needs improvement' category.

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).	Advanced	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.	6	6	0

Comment: Stanley and Stella has mapped the risks to FoA in all its sourcing countries and can explain the main risks per country, including the risks to women workers. . In Bangladesh, the brand identified that worker representation mechanisms are often ineffective or non-functional. While in China, the brand acknowledges that FoA is highly restricted and complex. Stanley and Stella uses this information to understand what the risks at its suppliers and the member has supplier-level monitoring in place to assess and understand the risk at suppliers.

In its quarterly Sustainability Audit Reports (SARs), the brand assesses the effectiveness of FoA and social dialogue structures within its suppliers, for instance, by reviewing meeting minutes. It also evaluates the participation of women in worker representation. Additionally, in Bangladesh, the member systematically includes worker representatives and worker input in its monitoring and improvement plans. In China, the brand emphasises the importance of FoA during visits and by sharing relevant policies and guidance.

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.	Intermediate	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.	4	6	0

Comment: Stanley and Stella has included gender in its human rights risk identification.
The member could show it understands the basic gender risks for its sourcing countries, and for instance, identified gender-based violence and wage discrimination as significant risks in both Bangladesh and China. In Bangladesh, the brand also found the primary risks include cultural barriers and discrimination that hinder women's upward mobility, resulting in very few women in supervisory roles.

Additionally, Stanley and Stella actively collects gender data per factory, including the number of women in supervisory roles, the number of women in worker associations, the existence and effectiveness of anti-harassment committees, the provision of maternity benefits, and the implementation of anti-harassment policies. This information is included in the brand's quarterly Sustainability Audit Reports (SARs).The member has yet to analyse the collected gender-disaggregated data at the factory and country levels.

Recommendation: Fair Wear recommends the member to start analysing the gender data collected at country and factory levels and connect them. Fair Wear's gender instruments can be helpful.

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.	Intermediate	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.	2	4	0

Comment: Stanley and Stella has a strong and systematic evaluation system for assessing suppliers' human rights performance. This performance is reviewed quarterly through Supplier Sustainability Scorecards (SSS), which apply clear scoring criteria across various areas. The evaluation takes into account daily overtime monitoring reports, monthly sustainability observation reports, audits, corrective action plans (CAPs), and other factory initiatives. The SSS serves as a management tool to facilitate discussions between the operations and sustainability teams, helping them determine appropriate actions. Occasionally, the outcome of this evaluation influences purchasing decisions, for example, the brand is planning a long-term exit from a low-scoring supplier, while exploring ways to expand business with high-scoring suppliers. For supplier with a high score, the brand is look into ways to increase business. Stanley and Stella has shared the outcome of the evaluation with its suppliers and their worker representatives.

However, the brand has yet to clarify to what extent the SSS score is weighed against standard business criteria in the brand's overall supplier evaluation and related purchasing decisions.

Recommendation: Stanley and Stella is encouraged to clarify how human rights performance is weighted in its supplier evaluation system compared to standard business criteria.

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: Stanley and Stella also has a policy on subcontracting in their Code of Conduct that all suppliers are required to sign. Stanley and Stella uses the outcomes of its human rights monitoring to respond to unauthorised subcontracting.There is no evidence of missing first-tier locations or subcontractors in the database. The brand does extensive supply-chain mapping to keep track of its production. In 2023, one Fair Wear onsite assessment found an issue on unauthorised subcontracting. However, according to the brand, they were aware of this factory, which is affiliated with the main factory as a sister concern. The sister concern has also signed the brand's Code of Conduct (CoC) and has undergone an audit Additionally, the member actively prevents unauthorised subcontracting. In Bangladesh, each supplier has an on-site quality assurance officer who monitors production and supplier capacity daily. In China, the brand's local employee regularly visits the factories to conduct plausibility checks on supplier capacity.

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: Stanley and Stella has identified whether homework is prevalent in its sourcing countries. According to the member there is a very low risk of homeworkers being used by its suppliers because all products the brand develops require heavy machinery. The brand monitors the risk of homeworkers in its suppliers through its regular on-site presence of its local team and the checking of employment records and factories' policy on homeworkers. Furthermore, audits have not identified homeworkers in Stanley and Stella's supply chain.

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: Stanley and Stella uses contracts with its suppliers in the form of 'general terms and conditions for purchase orders'. These contracts stipulate amongst others: payment terms of ten days before the estimated time of order arrival (Bangladesh) or downpayment on sight(China). The contract also explicitly mentions ring-fencing labour costs, ensuring that price negotiations will not affect the wages of the workers. Moreover, the contracts outline the minimum order quantities for each style the brand commits to buy together with its lead times. This list is to be revised every six months according to the contracts.

An unequal burden is placed on the suppliers by including penalties for delivery delays after three weeks and quality issues without proof of fault by the supplier. The contracts do not yet address shared responsibilities for implementing the Code of Labour Practices (COLP) or Human Rights Due Diligence (HRDD). The focus remains primarily on supplier obligations, with limited attention to the brand's own responsibilities.

Recommendation: Fair Wear strongly recommends that Stanley and Stella remove penalties for late delivery from its contracts, or at least ensure there is 'proof of fault by the supplier'.
Stanley and Stella is advised to review its contracts with suppliers against the principles mentioned in the Common Framework of Responsible Purchasing Practices (CFRPP).
Fair Wear recommends the member to enrol in the learning module 'Introduction to responsible contracting in the supply chain'.

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.	Advanced	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.	6	6	0

Comment: Within Stanley and Stella there is an active interchange of information between CSR and other departments to enable coherent and responsible business practices.
The member includes responsible business practices in job role competencies. For instance, in the job description of the Head of Global Sourcing, one of the responsibilities states, 'Monitoring economic criteria (price, time-to-market, min. quantities of order) you ensure that our high standards in terms of innovation, social compliance, and sustainability are met'.
In the quarterly supplier evaluation, CSR and sourcing also use a shared KPI scorecard for all suppliers. The brands has not yet adopted KPIs supporting good sourcing and pricing strategies for its sourcing and purchasing staff.

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

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.15 Member company's purchasing practices support reasonable working hours.	Advanced	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.	6	6	0

Comment: At the beginning of each year, Stanley and Stella discuss capacity and order estimates for the coming year with its suppliers. Stanley and Stella applies fixed lead times as agreed in its contracts with its production locations. Any factory closures for public holidays are added to these lead times. Production lead times range from eight weeks when raw materials are available on-site to sixteen weeks if materials must be imported. For certain raw materials, Stanley and Stella maintains a buffer stock at the factory to shorten lead times.

According to supplier contracts, the brand provides a rolling forecast for the next five months. Orders are placed monthly, and each month Stanley and Stella reviews deviations between its forecasts and actual orders, reporting back to headquarters. If orders exceed forecasted quantities, the brand checks with the factory to confirm capacity and accepts extended lead times if necessary. In cases of delays, the brand is willing to accept longer lead times and, in some instances, covers air freight costs for raw materials.

Stanley and Stella primarily deals with Never Out of Stock items, maintaining sufficient stock levels to allow flexibility in case of production delays. For new product launches, the brand follows an extensive development process that can take up to 18 months. The supplier is involved in the product development process and for launch orders the brand sets a four-month lead time to give factories ample time to adjust. The product development team also travels to the factory, staying for 3-4 weeks to ensure a smooth transition for the new product.

In line with its Code of Conduct, which suppliers sign, the brand does not permit overtime. In Bangladesh, the quality assurance team monitors any overtime through a daily overtime tracking tool.

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.	Advanced	Understanding the labour component of buying prices is an essential first step for member companies towards ensuring the payment of minimum wages - and towards the implementation of living wages.	Interviews with production staff, documents related to member's pricing policy and system, buying contracts, cost sheets including labour minutes.	6	6	0

Comment: Stanley and Stella has a strong understanding of the wage levels at its suppliers and connects this understanding to its own buying prices. To get insights into the labour component of its prices, the brand requires its factories to share the key cost elements. Together with a consultant, the brand then uses this information to calculate the labour minutes and labour costs. The calculation is afterwards shared with the factory to gather feedback. As a result, the brand has detailed knowledge of labour costs, indirect and overhead costs, and labour minutes for each product, with production efficiency factored into the calculations.

Labour costs are non-negotiable in price setting, and Stanley and Stella include changes to the legal minimum wage or inflation in its buying prices. Following Bangladesh's recent minimum wage increase, the brand adjusted its prices in agreement with the supplier.

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.	Advanced	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.	4	4	0

Comment: The member uses one agent for a supplier based in Bangladesh. The agent fully supports the implementation of the Code of Labour Practices (COLP) and signed the questionnaire before production started. In addition, the Bangladesh Sustainability Operations Team is also in direct contact with the supplier to implement the COLP.

Layer 3 Prevention, mitigation and remediation

Possible Points: 90
Earned Points: 62

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.	Intermediate	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.	4	6	0

Comment: Based on the risk identification as described in chapter two, Stanley and Stella has linked factory risks to appropriate follow-up for factories covering 100% of FOB. The brand priorities by first ensuring that each factory meets the mandatory requirements it has set. If these are met, it then focuses on the highest risks identified in the quarterly Sustainability Audit Report (SAR), where risks are assessed based on likelihood and severity scores. For example, in one of the factories no new participation committee was selected. Therefore, the brand defined a followup plan where it required the factory to organise worker elections to form a new participation committee. The action plans includes a specific task, a timeline, and an assigned responsible person, and it is drafted collaboratively with factory management, who sign off on it. In addition to actions defined in the SAR, the brand also separately follows up on corrective action plans (CAPs) from audits. Finally, in the quarterly supplier evaluation, further actions are set based on the primary areas for improvement.

Stanley and Stella sources from Eleven production locations in Bangladesh. The member has not signed the International Accord. Ten of its factories are covered by the RMG Sustainability Council (RSC), and one factory falls out of the RSC's scope.For this factory, Stanley and Stella use a third-party to conduct audits on fire and building safety. In Bangladesh, the brand follows up on all non-compliances identified by the RSC, incorporating these issues into its risk identification and action plans outlined in the Sustainability Audit Report (SAR). Furthermore, the brand ensure to always apply for a remediation audit to verify the improvements. In its quarterly supplier evaluation, the brand includes the the number of open and remediated non compliances identified by the RSC. This year, the brand began engaging with another customer in their factories who are signatories of the Accord to collaborate on joint prevention, mitigation, and remediation efforts. However, no specific actions have been defined yet, and the brand does not financially contribute to remediation activities.

Recommendation: Fair Wear strongly recommends Stanley and Stella to become a signatory of the International Accord or at least follow Fair Wear's Enhanced Human Rights Due Diligence Policy for fire, structural and electrical safety in Bangladesh.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.2 Member company's action plans include a gender lens.	Intermediate	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.	4	6	0

Comment: As described in 2.9, the brand has included gender-specific risks in its risk identification and collected gender-specific data per factory. From this identified risk, the brand has defined specific actions, such as providing training on female leadership, setting up an anti-harassment committee, or conducting a gender mapping.

Recommendation: Fair Wear recommends Stanley and Stella make the gender lens in its action plans more comprehensive, including actions related to the code of labour practices other than discrimination or social dialogue.

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.	Advanced	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.	6	6	0

Comment: Stanley and Stella included comprehensive steps to encourage FoA and effective social dialogue in most action plans. During monthly observation checks, the brand regularly verifies that worker representation and social dialogue mechanisms are functioning effectively by reviewing meeting minutes, training reports, and clarity of processes, roles, and responsibilities. If issues are found, the brand ensures that training is organised.

In addition, the brand involves worker representatives in opening meetings of the quarterly Sustainability Audit Reports (SAR) and in follow-up meetings for corrective action plans (CAPs). Prior to these meetings, they check that workers have been informed of the upcoming discussions and that they had opportunities to contribute. As improvement steps, Stanley and Stella follows up on audit findings related to FoA, for example requiring the factory to organise new elections for new worker representatives. The member has applied a gender lens and ensure its steps to promote FoA and effective social dialogue address the specific risks for female workers.

In China, where social dialogue is more restricted, Stanley and Stella implements the following actions to encourage it; checking grievance mechanisms, reviewing factory policies, enrolling factories in Fair Wear audits and onboarding training, and requesting that factories post relevant information on notice boards.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.4 Member company actively supports a factory-level grievance mechanism.	Advanced	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.	6	6	0

Comment: Stanley and Stella actively supports and monitors the effectiveness of factory-level grievance mechanisms. Suppliers' factory-level grievance mechanisms are assessed at the start of the business relationship and monitored systematically throughout the year in the quarterly SAR. The effectiveness is monitored by reviewing the factories grievance policy, confirming that grievance channels are clearly communicated, consulting with workers and their representatives, and examining the grievance registry to assess the number of grievances filed and resolved. If a mechanism is found to be ineffective, the brand provides support by organising training. The effectiveness of the internal grievance mechanism is also a criterion in the quarterly supplier evaluation.

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.	Intermediate	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.	4	6	0

Comment: Stanley and Stella cooperate with other Fair Wear members and customers at its shared suppliers to respond to CAPs and complaints. They also cooperate in taking more preventive measures, such as organising training, and they are exploring ways to collaborate on living wages.

Regarding the Enhanced Human Rights Due Diligence Policy for fire, structural, and electrical safety in Bangladesh, Stanley and Stella can demonstrate that they reached out to another buyer who is a signatory of the International Accord to work on joint prevention, mitigation, and remediation, no specific actions have been defined yet.

Recommendation: Member brands sourcing in Bangladesh must collaborate on prevention, mitigation and remediation at their shared suppliers with Accord signatories.

Indicators on implementation: improvement and prevention

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.6 Degree of verified actions.	65%	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.	4	6	-2

Comment: In the past financial year, Stanley and Stella has received three Fair Wear full onsite assessment reports. One of the factories in which an onsite assessment took place closed due to financial problems. Therefore, the brand was not able to follow up on all issues found during the audit. For the other two assessments, the brand could demonstrate during the performance check it has followed up on 65% of actions out of all outstanding actions. Example of improvement actions that were taken include organising an onboarding and refresher training on the terms and conditions in the employment contracts, changes to factory policies on child care and training and monitoring usage of PPE and updating its injury compensation policy.

Stanley and Stella has shown that it also followed up on more structural and complex issues, such as organising training on female leadership and training on the roles and responsibility of the worker committees.

Several issues identified in RSC audits remain open across half of the factories. During the brand performance check, the brand could show proof of follow-up on these actions. Stanley and Stella has applied for the RSC remediation audits, however these has not taken place yet, and as a result issues are still open.

Requirement: Members who are sourcing in Bangladesh and are not signatories of the International Accord must demonstrate proof of (financial) contribution to preventive, mitigative and remediating actions.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.7 Degree of progress towards implementation of prevention programme.	Intermediate 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.	4	6	-2

Comment: It is standard process for Stanley and Stella to identify root causes of all CAP issues from audits as well as for the risk identified in the SAR. These root causes are discussed with suppliers, and preventive steps are jointly defined. The member has implemented some preventive steps. For example, the root cause identified for the limited amount of women in supervisory roles are cultural barriers which often prevent women from applying for supervisory roles. To address this, Stanley and Stella implemented preventive actions, such as organising training and enrolling suppliers in gender-focused programs to help overcome these barriers.

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

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, three out of the three onsite assessment reports mention excessive overtime. Stanley and Stella analysed the root causes of these findings, identifying factors such as poor communication between production departments and management, higher overtime allowances permitted by the Bangladeshi government compared to the brand's standards, and production delays due to political unrest.

The brand acknowledges this as a systemic issue and has set up an overtime check at a factory level. Quality assurance officers at each factory collect the working hours data for lines working for Stanley and Stella. Any overtime above 2 hours per day or 12 hours per week is flagged. An online overtime tracker tool is shared with concerned teams. When excessive overtime occurs, the brand immediately reaches out to factory management, tries to understand the reasons, and reiterates that excessive overtime is unacceptable as per the brand's Code of Conduct. Through its production planning the brand also aims to minimize excessive overtime, for example through being flexible with lead times when delays happen and by working with a lot of repeat orders which allows for high efficiency.

Stanley and Stella aims to to collaborate with other customers to increase it leverage on the factory to reduce overtime. However, the brand has found this difficult especially in the last year when there was a lot of unrest in Bangladesh. During this unrest the brand aimed to reduce pressure on its factories by allowing for longer lead times.

Recommendation: Fair Wear advises Stanley and Stella 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.	Advanced	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.	4	4	-2

Comment: In the previous year, two out of three audits included findings regarding non-payment of the legal minimum wage and legally required wage elements. One factory faced financial difficulties and subsequently closed, preventing the brand from fully addressing the identified issues. Before the closure, the brand provided financial support in the form of a pre-payment to ensure that workers would receive their wages. Unfortunately, these funds did not reach the workers. Since the closure, the brand, alongside other Fair Wear members, continues efforts to secure payment for all affected workers.

At another factory, issues were identified regarding delayed benefit payments to resigned workers and the absence of injury compensation. The brand followed up on this issues to ensure benefit payments were made and worked with the factory to update its policy, requiring benefits to be paid within 30 days in the future. For injury compensation, the brand collaborated with the factory to develop a new injury compensation policy, which was subsequently posted on the notice board. However, injured workers did not receive retroactive compensation. There was one finding of non-payment of the legal minimum wage. However, the brand found that this was due to inaccurate payslips that did not clearly specify all wage components. The brand requested that the factory revise its payslip format to include all required wage elements.

Stanley and Stella has included workers' representation in finding a solution to these findings.

Recommendation: Fair Wear strongly recommends Stanley and Stella to ensure problems of payments below legal minimum wages are not just prevented going forward but also remediated retroactively.

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.	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.	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.	4	6	0

Comment: Stanley and Stella has an overview of the wage levels at its suppliers, discusses the topic of wages with 100% of its suppliers. Stanley and Stella has done a thorough root-cause analysis to find out why wages at suppliers are below the living wage. Root causes include include factory management's concern about competitiveness, high inflation rates, the need for involvement from other buyers, and limited governmental support.

Currently, Stanley and Stella are analysing the gap between current wage levels and the living wage standard. This data is collected through both factory input and worker surveys. Based on this analysis, the brand plans to develop a long-term strategy to raise wages across production locations. At certain factories, management has already committed to working toward a living wage, and Stanley and Stella have developed a roadmap with these factories to achieve this goal.

Additionally, the brand has reached out to other buyers to collaborate on working towards living wages. In Bangladesh, Stanley and Stella are also involved in lobbying activities, recognising that country-wide efforts are essential to implement living wages effectively.

Recommendation: Fair Wear encourages Stanley and Stella to further 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.	Basic	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.	2	6	0

Comment: Stanley and Stella has an overview of wages paid in production locations and discussed wage increases with its factories. Currently, Stanley and Stella are analysing the gap between current wage levels and the living wage standard. With some suppliers, Stanley and Stella has already developed a time-bound plan to gradually raise wages. These plans do not yet include defined target wages and living wage standards, these will be based on the outcome of the analysis.

The brand has initiated internal discussions on the topic of living wages and potential funding methods to support wage increases, though a formal strategy on how to finance these increases has yet to be developed.

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

Recommendation: Fair Wear recommends Stanley and Stella to enrol in the Living Wage programme on Fair Wear's learning platform.

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: Stanley and Stella does not contribute to higher wages at any of its production locations.

Requirement: Stanley and Stella is required to show that discussions and plans for wage increases have resulted in the payment of a target wage.

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.	Advanced	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.	4	4	-2

Comment: Stanley and Stella received 15 complaints in the past financial year in six suppliers in Bangladesh. These complaints were related to Fair Wear labour standards: 'living wages', 'reasonable working hours', 'legally binding employment relationships', and 'safe and healthy working conditions'.

The brand actively addressed each complaint following Fair Wear's Complaints Procedure. Upon receiving a grievance, Stanley and Stella communicated it to the factory to obtain their response and conducted a root-cause analysis. From there, the brand collaborated with factory management, worker representatives, and other sourcing brands to resolve the issue. Outcomes from each complaint are documented in the factory's Sustainable Audit Report (SAR) and are reviewed quarterly. Where necessary, Stanley and Stella also implements preventive measures, such as organising training sessions, to help prevent recurrence of similar issues.

Expect for two complaints all complaints are resolved. The two open complaints are result of a closure of one of Stanley and Stella's factories. Since the closure, the brand, alongside other Fair Wear members, continues efforts to secure payment for all affected workers.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.15 Degree to which member company implements training to address the risks identified.	Basic	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.	2	6	0

Comment: Stanley and Stella has some CAP findings where training is a recommended follow-up action.
In 2023, the brand enrolled two suppliers in training: one in onboarding training and another in a Workplace Education Program (WEP) focused on violence and harassment prevention. Stanley and Stella organised most training related to CAP findings in 2024, including four onboarding training sessions at factories in Bangladesh and one training session in a new factory in China.

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.	Advanced	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.	6	6	0

Comment: Stanley and Stella followed up on all training results by checking the training reports together with factory management gathering feedback from both management and worker representatives. They then followed up on the training recommendations accordingly. Additionally, the brand incorporated the training results into its human rights due diligence process by monitoring awareness levels during each supplier's Sustainability Audit Report (SAR).

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: Stanley and Stella's human rights due diligence system includes a responsible exit strategy. In the past financial year, the member moved production from three production locations to their sister companies. In addition, one factory ran into financial difficulties resulting in a stop in production. In 2023, Stanley and Stella further defined its responsible exit strategy, defining per month what steps need to be followed. These steps include conducting an exciting impact assessment including worker representatives and follow-up on wages and legally entitled severance payments. The member followed the steps in the responsible exit strategy.

Stanley and Stella did not discuss the responsible exit strategy with all its suppliers.

Recommendation: Stanley and Stella could discuss the responsible exit strategy with its suppliers, for instance as part of its supplier evaluation.

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.	Basic	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.	2	6	0

Comment: Stanley and Stella undertakes activities related to human rights that go beyond Fair Wear's scope. The brand has conducted a thorough mapping of its supply chain and developed an onboarding process for all partners. Additionally, it performs country risk assessments for deeper supply chain tiers. In Tier 2, the brand regularly visits facilities and conducts monthly sustainability observation reports. However, the brand has not yet implemented any remediation and preventive activities in the deeper tiers.

Layer 4 External communication, outreach, learning, and evaluation

Possible Points: 22
Earned Points: 16

Indicators related to communication

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.1 Member company actively communicates about Fair Wear membership.	Advanced	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.	4	4	0

Comment: Stanley and Stella communicates accurately about Fair Wear membership on its website. The member also uses other channels to inform customers and stakeholders about Fair Wear membership. By communicating about Fair Wear and Stanley and Stella's human rights due diligence efforts on its website, its garments and on its social media, Stanley and Stella actively spreads the Fair Wear message.

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

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: Stanley and Stella has submitted its social report, which Fair Wear approved. Stanley and Stella 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: Stanley and Stella published its social report, which includes some factory-level data, on its website.
The factory level data Stanley and Stella included are the number of factories per country and the aggregated audit results per audit.
Stanley and Stella has yet to disclose its full factory list and its time-bound prevention, remediation and mitigation actions.

Recommendation: Stanley and Stella is recommended to publish a complete factory list. Fair Wear recommends Stanley and Stella 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.	Advanced	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.	6	6	0

Comment: Stanley and Stella has a system to track progress and check if implemented measures have been effective in preventing and remediating human rights violations. The performance of the overall supply chain is evaluated quarterly between the CSR team and the suppliers using the Supplier Sustainability Scorecards (SSS). Additionally, following the Brand Performance Check (BPC), a social action plan is developed and used throughout the year to monitor the brand's own progress. Lastly, top management and operations teams annually review the overall sustainability performance of the brand. In its evaluation system, the member includes triangulated information from external sources, such as Fair Wear audit reports and supplier and worker representative feedback.

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 the following requirements:

'Stanley and Stella must include all sourcing countries in its risk scoping.'

'Fair Wear strongly urges Stanley and Stella to update its responsible exit strategy so it aligns with Fair Wear's requirements, specifically adding the involvement of relevant stakeholders, particularly unions, NGOs, and/or labour inspection where applicable.'

'Stanley and Stella should report on factory-level data and remediation results. Good reporting by members helps to ensure the transparency of the member and Fair Wear's work.'

'Stanley and Stella must include the requirements of the new 'Enhanced Human Rights Due Diligence Policy for fire, structural and electrical safety in Bangladesh' in its monitoring system. In accordance with the policy, the member must be able to demonstrate collaboration on prevention, mitigation and remediation with the signatories of the International Accord, as well as proof of actual (financial) contribution to what is required from the RSC activities for all its production locations in Bangladesh.'

'Stanley and Stella is required to show that discussions and plans for wage increases have resulted in the payment of a target wage.'

Stanley and Stella followed up on the first two requirements. Together, less than half of the requirements were addressed.

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.: Yes

Comments: Stanley and Stella actively participated in labour and advocacy efforts in both the EU and Bangladesh. These include, for example, advocacy efforts on Due diligence legalisation and supporting the minimum wage increase in Bangladesh.

5.3 Member company actively contributed to industry outreach, visibility, and learning in its main selling markets.: Yes

Comments: Stanley and Stella actively contribute to industry outreach by contributing to several events as a speaker on Due Diligence and Human Rights.

Recommendations to Fair Wear

Stanley and Stella recommend that Fair Wear share more best practices and enable shared learning between member brands, focusing on practical feasibility rather than theory. Furthermore, they ask Fair Wear to be mindful not to overload member brands with administrative tasks to ensure the brand has enough time and capacity to work on actual implementations of HRDD. They find that the current member hub is too complex, which results in a heavy workload. Lastly, they recommend that Fair Wear explore more collaboration with other organisations to ensure efficiency and avoid duplications of requirements for the brand.

Brand Performance Check details

Date of Brand Performance Check: **16-10-2024**
Conducted by: **Sanne Beukers**
Interviews with: Jean Chabert (CEO)
Michel Hublet (Head of Sustainability)
Céline Charveron (Sustainability ambassador)
Abdulla Al Rumi (Country Manager Bangladesh)
Sharif Nehal (Sustainability Operations Bangladesh)
Jahin Rahat Khan (Sustainability Operations Bangladesh)
Zayadul Islam (Quotation Merchandiser)
Matthew Ma (Country manager China)