



Brand Performance Check

The Cotton Group S.A. (B&C)

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: 142

Possible score: 202

Benchmarking Score: 70

Performance Benchmarking Category: Leader



Foundational
system's criteria

100%



Sourcing strategy

76%



Identifying
continuous human
rights risks

80%



Responsible
purchasing
practices

77%



Quality and
coherence of
prevention and
remediation system

87%



Improvement and
prevention

47%



Communication,
transparency and
evaluation

82%

Summary:

B&C The Cotton Group (B&C) has met most of Fair Wear's performance requirements. With a total benchmarking score of 70, the member is placed in the Leader category.

The member has scored insufficient on some repeated non-compliance indicators. These need to be resolved in the next performance check, else B&C will be automatically placed in Needs Improvement.

B&C sources from ten production locations in Bangladesh with a production volume of 90% of its total FOB. The member company has not signed the International Accord. B&C only sources from factories that are covered under the RMG Sustainability Council (RSC). However, as B&C does not (financially) contribute to remediation of the RSC reports, this means a violation of Fair Wear's updated enhanced policy for Bangladesh.

B&C's sourcing strategy focuses on increasing influence through consolidation and long-term relations. B&C conducts risk scoping and includes all risk factors. In its risk scoping, the member has assessed the impact and prevalence of the risks correctly. The risk scoping includes a gender lens. The member particularly looks at discrimination and gender-based violence and harassment, which it considers as high risks across its supply chain. Input from workers, suppliers and stakeholders is included in the risk scoping by directly engaging with worker committees and factory management and using the Fair Wear country profiles which includes worker and stakeholder information as well.

B&C 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 for almost all countries. For instance, the brand assesses human rights risks in all its production locations by enrolling them in full onsite assessments and external audits, organising monitoring visits at least once a year, conducting desktop research, collecting factory data on internal dialogue structures and collecting gender-disaggregated data. For all its production locations in Bangladesh, the member conducts monitoring visits on a monthly basis. However, B&C does not have an appropriate system to identify health and safety risks at its Bangladeshi suppliers as it is not a signatory of the International Accord and does not have access to the assessments of RSC itself. B&C does only source from suppliers covered by the RSC and its suppliers share the assessments of RSC with B&C. However, as B&C does not financially contribute to the follow-up of the assessments of RSC, the brand does not adhere to the requirements of the 'Enhanced Human Rights Due Diligence Policy for fire, structural and electrical safety in Bangladesh' and therefore scores insufficient on the indicators related to risk assessments and factory action plans.

During 2023, B&C focused on gender and freedom of association, strengthening internal social dialogue mechanisms at its suppliers. The member coordinated an Harassment Prevention Theatre action training at one of its suppliers in Bangladesh addressing discrimination, sexual harassment and low awareness of internal dialogue structures. Moreover, B&C worked on ensuring worker committees are included in CAP follow-up throughout its supply chain and following up on ongoing Violence and Harassment Prevention Programmes which includes the setting-up or strengthening of a worker committee at three Bangladeshi suppliers.

Fair Wear strongly recommends B&C to identify root causes of non-compliances with legal wage requirements, especially when these findings are recurring, to ensure problems of payments below legal minimum wages are prevented from occurring again. Next to that, Fair Wear strongly encourages B&C to analyse what is needed to increase wages and develop a strategy to finance the costs of wage increases.

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 The Cotton Group S.A. (B&C)

Member company information

Member since: 1 Jan 2017

Product types: Promotional wear and accessories

Percentage of turnover of external brands resold 0%

Member of other MSI's/Organisations Amfori - BSCI, Peta, OEKOTEX, BCI (Better Cotton Initiative) and Textile Exchange

Number of complaints received last financial year 10

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
Bangladesh	10	89.55%
Pakistan	1	8.94%
China	3	1.5%

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

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: B&C 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: B&C 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: 70

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.	Advanced	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.	6	6	0

Comment: B&C has a sourcing strategy addressing influencing labour conditions. The member has 14 active suppliers. 85% of the production volume comes from suppliers where the member has at least 10% leverage at suppliers. 5% of the production volume comes from suppliers where B&C buys less than 2% of its total FOB. This is comparable to the previous year. B&C has not yet included a consolidation plan in its sourcing strategy as it has already consolidated its supply chain to a reasonable extent. The member has addressed cooperation with other clients in its sourcing strategy and focuses on cooperation in its business practices as it asks all potential suppliers about its other buyers.

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

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: B&C has a sourcing strategy that focuses on maintaining long-term relationships. 83% of the member's total FOB volume comes from suppliers with whom B&C has a business relationship for at least five years. The member does not commit to long-term contracts yet.

Recommendation: Fair Wear recommends B&C 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: B&C conducts risk scoping and includes all risk factors. In its risk scoping, the member has assessed the impact and prevalence of the risks correctly. The risk scoping includes a gender lens. The member particularly looks at discrimination and gender-based violence and harassment, which it considers as high risks across its supply chain. Input from workers, suppliers and stakeholders is included in the risk scoping by directly engaging with worker committees and factory management and using the Fair Wear country profiles which includes worker and stakeholder information as well.

The member adjusts its sourcing strategy based on the risk scoping, as outcomes of the scoping are included in decision-making regarding potential new sourcing countries. For example, the brand followed Fair Wear's guidance and decided against sourcing from Myanmar. To date, B&Cs sourcing strategy does not mention a preference for countries where workers can freely form or join a trade union and/or bargain collectively. The member ensures that there are worker committees present in all its factories and actively engages with the worker committees to mitigate the risks coming from the absence of or limited room for the rights to Freedom of Association (FoA).

Recommendation: Fair Wear strongly recommends B&C 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: It is the standard process for B&C to inform new suppliers about its HRDD policy and Fair Wear membership by sharing the Fair Wear questionnaire and Worker Information Sheet and discussing these with factory management and worker representatives, asking suppliers whether other Fair Wear member brands are present in the factory already asking suppliers whether they are open to receive a Fair Wear factory onsite assessment. This process has been followed for the two suppliers added last year. Additionally, the brand is in dialogue with its suppliers about human rights and how the supplier and B&C can cooperate on this topic.

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.	Advanced	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.	6	6	0

Comment: B&C collects human rights information of potential new suppliers by conducting a risk scoping assessment, collecting existing onsite assessment reports and organising a monitoring visit during which the member conducts a factory self-assessment on CSR topics. B&C also engages with worker committees during the monitoring visits and uses this as input for its self-assessment. The member only places test orders at factories which meet their pre-requirements.

The member company onboarded two suppliers in Bangladesh and checked the remediation status from the RSC factory assessment before placing the first purchasing order. The member does not work with factories that are not covered by the RSC, and only started sourcing from the new facilities in Bangladesh after they received a RSC factory assessment. B&C has not signed the International Accord itself.

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.

B&C followed this process for the suppliers added in the last previous year.

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.	Intermediate	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.	4	6	0

Comment: B&C has added two new suppliers in Bangladesh. B&C has shared information about Fair Wear's CoLP and the grievance mechanism within the first year of doing business. The Worker Information Sheet has been posted. B&C has not yet organised onboarding training sessions for its new suppliers to raise awareness about the Fair Wear CoLP, the grievance mechanism, or the importance of social dialogue. Instead, the member engages in dialogue with factory management and worker committees to raise awareness about the Fair Wear CoLP and the grievance mechanism and to verify that they understand how Fair Wear grievance mechanism works. These discussions included the topic of social dialogue. B&C verifies that worker committee members are aware of the functioning and responsibility of the worker committees. B&C ensured that women could participate equally in these discussions.

Recommendation: B&C is recommended to organise introductory training for management on social dialogue 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.	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: B&C 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 for almost all countries. For instance, the brand assesses human rights risks in all its production locations by enrolling them in full onsite assessments and external audits, organising monitoring visits at least once a year, conducting desktop research, collecting factory data on internal dialogue structures and collecting gender-disaggregated data. For all its production locations in Bangladesh, the member conducts monitoring visits on a monthly basis. The member decides on the frequency of enrolling its suppliers in full onsite assessments based on the factory findings. Suppliers without high-risk factory findings are enrolled in a full onsite assessment once every three years, while suppliers with higher-risk findings are enrolled in full onsite assessment every one or two years, depending on the risk level of the factory. For example, the brand conducted a monitoring visit during which it reviewed all wage and hour records and personnel files after it found an increased risk of forced labour at the factory.

B&C does not have an appropriate system to identify health and safety risks at its Bangladeshi suppliers as it is not a signatory of the International Accord and does not have access to the assessments of RSC itself, nor the complaints. B&C does only source from suppliers covered by the RSC and its suppliers share the assessments of RSC with B&C. However, as B&C does not financially contribute to the follow-up of the assessments of RSC, the brand does not adhere to the requirements of the 'Enhanced Human Rights Due Diligence Policy for fire, structural and electrical safety in Bangladesh' and therefore scores insufficient on this indicator.

Next to its systematic approach, the brand ensures it uses different tools that include input from workers, suppliers, and other stakeholders. These tools are: Fair Wear factory assessments, onsite monitoring visits during which the member conducts its own factory assessments in which worker and management interviews are included, monitoring worker committee meeting minutes and factory training reports on social dialogue mechanisms and direct engagement with worker committees and factory management regarding the CoLP.

Requirement: 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.

B&C 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.

B&C is required to continue its increased monitoring of the risks related to forced labour for its suppliers where forced labour is a high risk, as outlined in Fair Wear's Forced Labour Policy.

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: B&C has mapped the risks to freedom of association (FoA) in all its sourcing countries and can explain the main risks per country, including the risks to women workers. The risks identified are, amongst others, 'workers cannot freely form or join the union of their choice' and 'existing worker committees are not involved in improving working conditions'. B&C uses this information to understand what the risks at its suppliers are and inform itself how to engage with its suppliers on this topic. B&C can demonstrate advanced knowledge and understanding of FoA in all countries where it sources. B&C understands the status of FoA at each of its suppliers.

The member has supplier-level monitoring in place to assess and understand the risk at suppliers. B&C uses in-depth discussions with suppliers and worker committees and factory onsite assessments to ensure supplier-level monitoring of the risk of violations to FoA. B&C can explain what the main risks of violations to FoA are at all its suppliers, including the risks specific to women workers. The member knows which suppliers have trade unions and CBAs in place, currently none suppliers do.

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.	Advanced	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.	6	6	0

Comment: B&C 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 sexual harassment and discrimination in hiring practices and wages as important risks prevalent in Bangladesh and Pakistan.

Additionally, B&C actively collects gender data per factory. Data that it collects are the ratio of male/female workers, the number of workers taking maternity leave, the number of workers receiving maternity payment in full, which factories have a functional child care facility and the ratio of male/female workers in supervisory roles. This information is collected through factory checklists the brand shares with its suppliers.

B&C analysed the collected gender-disaggregated data at the factory and country levels. The main conclusions (so far) are that there is a discrepancy between the ratio of male/female workers and the ratio of male/female workers in supervisory roles and that extra attention is needed on this topic. According to the member, this is both due to patriarchal values and to gendered social roles in society, making it so that women already carry more responsibility at home and are therefore reluctant to take on more responsibility at work as well. The member specifically looked into how its business practices affect gender at its suppliers by filling out Fair Wear's Gender Checklist for Brand Awareness.

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: B&C has a strong and systematic evaluation system for assessing suppliers' human rights performance. Each supplier is assessed on five key areas: Audit results (15%), Social Performance (30%), Safety (25%), Environment (20%) and Production (10%). The CSR team identified various criteria per key area. For social performance these are, for example, trade union presence, overtime, worker turnover, and absenteeism rate. For safety performance, for example, International Accord coverage, the quality of fire equipment, the quality of Personal Protective Equipment and building safety are included.

The brand systematically integrates the outcome of this evaluation into its purchasing decisions. For example, one supplier which paid its workers late was put on hold. B&C shared with them that they would not start production again until they could solve the issue of late payments.

B&C has not yet shared the outcome of the evaluation with its suppliers and their worker representatives, but shares the topics on which suppliers score lower as talking points with its suppliers during monitoring visits.

Recommendation: Fair Wear recommends B&C to share and discuss the outcome of the supplier evaluation with all its suppliers and their worker representatives.

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: B&C 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. Additionally, the member actively prevents unauthorised subcontracting by visiting suppliers in Bangladesh during production and by checking the production report against the production capacity of a factory weekly in China and Pakistan. B&C also has a policy on unauthorised subcontracting which all suppliers have to sign before starting production.

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: B&C 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 and all its suppliers have security measures in place which prevent workers from taking garments home. Moreover, the brand conducts regular onsite monitoring visits for all its Bangladeshi suppliers which make up over 70% of the brands overall suppliers and also visited its Chinese and Pakistani supplier in the previous financial year.

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: B&C uses contracts with its suppliers. The member has agreements in the form of purchase orders that stipulate payment terms and penalties. Payment terms are up to 60 days upon the goods being loaded on the vessel. Only if the member company can prove a delivery delay is the fault of the supplier will penalties be charged.

Although the contract includes the Code of Labour Practices, the contract itself does not support the implementation of human rights due diligence. These contracts do not yet mention the shared responsibilities of CoLP implementation.

Recommendation: Fair Wear strongly recommends B&C to include the shared responsibility of CoLP implementation in its contracts, including fair payment terms. B&C is advised to review its contracts with suppliers against the principles mentioned in the Common Framework of Responsible Purchasing Practices (CFRPP).

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: 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, working towards open costing, working on sourcing opportunities in line with B&Cs sourcing strategy and monitoring sustainability opportunities is included in the job description of the sourcing manager.

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: B&C knows the capacity of each factory at the style level and their lead times. B&C plans production in collaboration with its suppliers. The brand has a long forecast of six months that they share with suppliers to support them in planning their capacities. This forecast gets reviewed and updated every month, in dialogue with suppliers. B&C has an overtime policy that encourages suppliers to plan and calculate capacities based on legal working hours and without overtime. It allows suppliers to produce quantities provided by B&C in the low season to reduce pressure during the peak season. B&C shares its planning with suppliers based on eight-hour workdays. Its suppliers sometimes plan based on ten-hour workdays, but B&C discourages this and monitors that its factories do not work more than 2-3 hours overtime a day and stay within the legal bounds of overtime.

B&C is in the printwear market and not bound by seasonality, which removes pressure from the suppliers. Moreover, the brand has a warehouse where it houses stock, which allows flexibility in quantities received if needed. The brand's main factories also have material stock which allows them to continue production in case of late material deliveries.

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: B&C has a strong understanding of the wage levels at its suppliers and connects this understanding to its own buying prices. B&C has no insight into the labour component of its prices, but it has introduced the Fair Price to some of its Bangladeshi suppliers. The lack of open costing makes connecting buying prices to wage levels challenging, but B&C collects wage data per factory, crosschecks this information with onsite assessment reports and discusses with its supplier whether its prices are enough to cover workers' wages plus benefits. B&C does not know the number of actual sewing minutes needed for a style nor the labour minute value of its suppliers. B&C includes changes in legal minimum wage or inflation in its buying prices. In the previous financial year, Bangladesh's legal minimum wage increased by 50%. B&C followed up on this by conducting a gap analysis of their prices related to the new wage levels and monitoring wage slips.

Recommendation: B&C could provide suppliers who do not work with fact-based costing, training on product costing and how to quote prices including (direct and indirect) labour costs. Fair Price product owners are available to conduct such training in all Fair Wear production countries.

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: B&C does not make use of sourcing intermediaries.

Layer 3 Prevention, mitigation and remediation

Possible Points: 90

Earned Points: 54

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: B&C has prioritised risks and created action plans per supplier, counting for 100% of the total FOB. These match the risk profile.

The member company could show it integrated the Accord Bangladesh Safety Program into action plans for its suppliers in Bangladesh but does not work on joint prevention, mitigation and remediation with the RSC and signatories of the International Accord. The member also followed up on a high risk of forced labour by applying heightened monitoring activities. B&C's Compliance Manager conducted a monitoring visit at the factory during which she checked all personnel files and monitored wage slips. However, as forced labour is hidden in nature, a monitoring visit is not enough to cease, prevent or mitigate the assessed risks of forced labour, which continues to be a high risk.

Though the action plans detail the different approaches to prevent, mitigate and remediate the prioritised risks and include a timeline, they do not yet include a budget.

Requirement: B&C is required to show it works on joint prevention, mitigation and remediation with the RSC and signatories of the International Accord.

B&C is required to cease, prevent or mitigate the assessed risks of forced labour in its supply chain. This should continue to be clearly defined in action plans per factory. Moreover, B&C should not increase its leverage at suppliers where a high risk of forced labour is identified.

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: B&C has included a gender lens in all its factory action plans based on its collection of gender-disaggregated data. Examples of improvement steps B&C took are conducting the following training modules: Three Violence and Harassment Prevention Programmes and two Women Empowerment and Harassment Prevention Theatre action training at four suppliers in Bangladesh which had factory findings on discrimination, sexual harassment and low awareness of internal dialogue structures. The member assessed the risk of discrimination and sexual harassment as high for its Pakistani supplier as well, but did not yet implement improvement steps at this factory.

Examples of preventive steps B&C took are collecting wage data to verify male and female workers get paid the same for the same job, monitoring worker committee meetings for sexual harassment complaints and discussing the collected gender-disaggregated data with its suppliers to encourage them to hire more women for higher-paid job positions.

Recommendation: B&C is recommended to start implementing a more comprehensive gender lens in all its action plans which focuss on improvement steps as well.

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: B&C included comprehensive steps to encourage FoA and effective social dialogue in most action plans. These steps include, amongst others, ensuring worker committees are included in CAP follow-up and organising training focused on raising awareness and strengthening anti-harassment committees. The member has implemented these steps. 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.

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: Suppliers' factory-level grievance mechanisms are monitored systematically every year. B&C monitors this through its monitoring visits, external factory site assessment reports, discussing the working of the complaints mechanism with workers and by checking the complaint register at its factories. B&C supports and monitors the mechanism and responds when the mechanism is ineffective. For example, B&C addressed the factory finding that grievances were not followed up properly and that the corrective action taken was not properly communicated to workers by discussing it with factory management, which in return revised its grievance mechanism policy and process. The factory posted the updated grievance mechanism process across the factory for all workers to see.

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.	Advanced	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.	6	6	0

Comment: B&C cooperates with other Fair Wear members at its shared suppliers, responding to CAPs and complaints. Next to that, the member also cooperates in taking more preventive measures, such as organising training. At suppliers that are not shared with other members, B&C works together with other customers on addressing factory issues. The member company works on joint prevention, mitigation and remediation with the factories covered by the RSC and signatories of the International Accord.

Indicators on implementation: improvement and prevention

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.6 Degree of verified actions.	50%	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: During the performance check B&C could demonstrate it has followed up 50% of actions out of all outstanding actions. These actions are linked to CAPs of full assessments conducted in the previous three financial years. Most resolved actions pertain to health and safety findings and findings related to discrimination, such as not having a formal appraisal procedure and midlevel management harassing line workers. Actions related to living wages or the payment of legally required wage elements related to structural issues are still outstanding.

Recommendation: Fair Wear strongly recommends ensuring that the size of the supply chain and the available resources of B&C 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.

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: B&C has identified some root causes of the CAP issues and discussed these with its suppliers. The member has implemented some preventive steps. Examples of the discussed root causes are legal minimum wages which are lower than living wages, patriarchal values in which men are held in higher regard than women directly related to harassment, and shipments taking place at night requiring workers to stay late and make overtime. The member implemented preventive steps such as providing workers with gift baskets and fair price shops with basic necessities, training workers and factory management on harassment and discrimination and asking its factories to change its shipments to the morning, in order to address these root causes.

Recommendation: Fair Wear recommends B&C to identify root causes of all CAP issues together with its suppliers.

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: B&C has no suppliers where action plans 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 three financial years, four onsite assessment reports out of the four under assessment mention excessive overtime. B&C analysed the root causes of these findings. According to the member, the factory's planning process is a significant cause for excessive overtime as capacity is systematically planned on overtime, as are late-night shipments.

The member has addressed this and promotes transparency about working hours by discussing its planning policy with suppliers, strict monitoring daily working hours, and supporting factories in working with automatic time-writing machines. Moreover, the brand never places orders which require overtime and asks its factories to ship products in the morning instead of at night. B&C could show that its efforts resulted in reduced excessive overtime at some suppliers.

Recommendation: Fair Wear advises B&C 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.	Insufficient	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: In the previous year, four out of four factory onsite assessments included findings regarding non-payment of legally required wage elements. The findings included late payments of wages and non-compliance with legal social benefits such as social insurance. B&C followed up on this by discussing these issues with factory management and worker committees, ensuring everyone is aware of the legal requirements and setting up a time-bound corrective action plan. B&C collects wage slips to verify whether the factory finding has been resolved. In the previous financial year, B&C followed up on all findings regarding non-payment of legally required wage elements but could only show verified remediation in one of the four cases.

Requirement: Please note that following Fair Wear's policy for repeated non-compliance, members that receive an insufficient score on this indicator for the second year will be placed in the 'needs improvement' category. If a supplier fails to comply with legal wage regulations, members are expected to respond in time, identify root causes with factory management, and ensure that local labour laws are respected. Evidence of remediation must be collected.

Recommendation: Fair Wear strongly recommends B&C to identify root causes of non-compliances with legal wage requirements, especially when these findings are recurring, to ensure problems of payments below legal minimum wages are prevented from occurring again.

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: B&C has an overview of the wage levels at its suppliers. B&C does not discuss the topic of wages with its suppliers. B&C has done a thorough root-cause analysis to find out why wages at suppliers are below the living wage. According to the member, wages in its supply chain are below the living wage as legal minimum wages are far below living wages. Moreover, they outline that wages at its Bangladeshi suppliers cannot be heightened as factory management follows the wages levels set by the BGMEA (Bangladesh Garments Manufacturers and Exporters). The member has yet to develop a systemic and time-bound approach to get wages increased towards a living wage.

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

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
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: B&C has started to address the topic of living wage internally, by setting up a living wage strategy. In its strategy, the member outlines that it believes living wages should be realised through collective lobby and advocacy, advocating for higher legal minimum wages in production countries, which meet living wage benchmarks.

B&C has an overview of wages paid in production locations. The member has not discussed wage increases with its factories. B&C does not have a strategy on how to finance wage increases at its suppliers. B&C does work on improving workers livelihood through social actions, such as organising a Fair Price Shop in which workers can buy basic commodities at a discounted price, giving workers gift baskets with basic commodities such as food, and by investing how to best support the education of workers' children.. During some "special week", B&C is financing an additional discount (e.g. 250 BDT discount for any purchase of 500 workers children education, making sure they will be equipped with necessary knowledge and tools for accessing to a better future.

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

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: B&C does not contribute to higher wages at any of its production locations.

Requirement: B&C is expected to begin setting a target wage for 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.	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: B&C received four complaints in the past financial year about living wages, legally binding employment relationships and safe and healthy working conditions at its suppliers in Bangladesh.

The member actively responded to these complaints as per Fair Wear's Complaints Procedure. B&C discussed the complaints in a timely manner with its supplier, involved other buyers and worker representatives where applicable, and monitored remediation.

For the three complaints related to legal wage requirements, the brand reacted by communicating to the factory's HR department that the workers in question should receive the legal wage requirements they were entitled to and monitored the payment. B&C conducted a root cause analysis for each complaint and held a meeting on this with the factory management to raise awareness about legal wage requirements and preventive steps to prevent similar complaints from occurring at its supplier in the future.

For the fourth complainant about a company picnic workers had to pay a fee to attend, B&C clarified with the factory management that this picnic was not mandatory and decided with the factory management on steps to communicate this to all workers. B&C conducted a root cause analysis for this complaint and followed up by checking in with worker representatives about workers understanding and satisfaction of the remediation.

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: B&C has some CAP findings where training is a recommended follow-up action. The member has enrolled some of its suppliers with findings on discrimination, sexual harassment and low awareness of internal dialogue structures in the following training modules: Three Violence and Harassment Prevention Programmes and two Women Empowerment and Harassment Prevention Theatre action training at four suppliers in Bangladesh.

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: B&C followed up on all training results by discussing the training with factory management and the worker committees. Additionally, the member used the results of the training as input for its human rights due diligence, by integrating the feedback from the discussions with factory management and worker committees into its factory risk assessments.

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: B&C's human rights due diligence system includes a responsible exit strategy. In the past financial year, the member stopped production at two production locations as B&C switched to another production location from the same supplier. B&C did not stop production with any suppliers. The member does currently have production on hold at three production locations, two for business reasons and one for CSR reasons. The member did not follow the steps in the responsible exit strategy in these cases and informed the factories of the decision to halt production approximately three months in advance. B&C has between 2-5% leverage at these factories and regularly updates the factories about its intentions to continue production at some point.

B&C has shared the responsible exit strategy with all its suppliers, through its supplier manual which all suppliers have to sign.

Recommendation: B&C is highly recommended to follow its responsible exit strategy when it puts factories 'on hold'.

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: B&C undertakes activities related to human rights that go beyond Fair Wear's scope, namely monitoring its deeper supply chain. B&C works on traceability and has started monitoring companies in its deeper tiers (tiers 2-4). For example B&C conducted monitoring visits and social onsite assessments at its zipper and polybags and boxes suppliers, conducted a monitoring visit at one of its fabric suppliers and collected onsite assessment reports from its transportation partner.

Layer 4 External communication, outreach, learning, and evaluation

Possible Points: 22

Earned Points: 18

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: B&C 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 membership on its social media channels and in its communication toolkit for retailers, B&C 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

Comment: B&C 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: B&C has submitted its social report, which Fair Wear approved. B&C 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: B&C reports on factory-level data and remediation results. B&C published its social report, which includes some factory-level data and remediation results, on its website. The factory level data B&C included are the main factory risks and factory findings and information on training and complaints. Next to that, the member also publishes its full factory list. B&C has yet to disclose its full time-bound prevention, remediation and mitigation actions.

Recommendation: Fair Wear recommends B&C 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: B&C has a system to track progress and check if implemented measures have been effective in preventing and remediating human rights violations. The internal evaluation system involves top management. In its evaluation system, the member includes triangulated information from external sources, such as worker committee meeting minutes, third-party onsite assessment reports and factory information such as wage slips and hour reports.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.6 Level of action/progress made on requirements from previous Brand Performance Check.	Intermediate	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.	2	4	-2

Comment: The previous performance check included the following requirements:

B&C should evaluate its contracts to ensure that it does not place an unequal burden on its suppliers or include terms that limit the possibility of implementing the Code of Conduct.

B&C needs to improve its Responsible Business Conduct Policy, to ensure better alignment with the OECD guidelines.

B&C should analyse what is needed to increase wages and develop a strategy to finance the costs of wage increases.

B&C is expected to begin setting a target wage for its production locations.

B&C followed up on the first two requirements. Together, half of the requirements were addressed.

Recommendation: B&C 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

B&C recommends Fair Wear to collaborate more, both with other organisations such as audit organisations, as with its members by increasing its brand calls. Moreover, B&C would like to be more involved in Fair Wear's lobby and advocacy strategy. Finally, B&C recommends Fair Wear to publish a 'Best practice' resource at the end of each performance check cycle based on notable practices collected throughout the Brand Performance Checks.

Brand Performance Check details

Date of Brand Performance Check: **11-06-2024**

Conducted by: **Maaïke Rubenkamp**

Interviews with: **Bruno Van Steenberghe** (head of sustainability)

Bruno Van Sieleghe (CR & Sustainability Manager)

Sabiha Akter (Compliance Manager)

Emma Choucha (Compliance and CR assistant)

Pierre-Jean Larrieu (Sourcing)

Robin Parry (Bangladesh Country Manager)