Brand Performance Check

Bel&Bo-Fabrimode NV

Publication date: February 2025

This report covers the evaluation period 01-02-2023 to 31-01-2024

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: 80
Possible score: 202
Benchmarking Score: 40
Performance Benchmarking Category: Needs Improvement



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
88%	59%	53%	46%	33%	17%	55%

Summary:

Bel&Bo-Fabrimode NV (Bel&Bo) has shown insufficient progress on performance indicators. With a total benchmarking score of 40, the member is placed in the 'Needs Improvement' category. While the member has been placed in the 'Needs Improvement' category for the second time, the member has not automatically placed in 'Suspended' since this is the first time the brand has been assessed with the new Brand Performance Check methodology.

The member conducted risk scoping and included risk factors based on country and supplier level where it sources the majority of its FOB. The member has yet to broaden its scope of the risk assessment to sector, business model, sourcing model and product levels. Bel&Bo also needs to include a gender lens to and steps to encourage FoA and effective social dialogue in its risk scoping and action plans.

In 2023, Bel&Bo has looked into whether its production planning has contributed to excessive overtime findings. The member has responded to overtime issues by splitting deliveries and receiving orders through air freight. The member has not yet looked into root causes of excessive overtime due to its small leverage. It is recommended that the member engages its suppliers on this topic to address any additional root causes.

Bel&Bo sources from 24 production locations in Bangladesh with a production volume of nearly 35% of its total FOB. The member company has signed the International Accord. Bel&Bo followed up with a finding related to failing to pay legal minimum wage with a supplier in Bangladesh. There was a case where maternity leave was paid partially, and only fully paying as per 2024. Therefore the issue has not been remediated retroactively. Members are expected to respond in time, identify root causes with factory management, and resolve that local labour laws are respected. Evidence of remediation must be collected.

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 Bel&Bo-Fabrimode NV

Member company information

Member since: 1 Jan 2015
Product types: Garments, clothing, fashion apparel
Percentage of turnover of external brands resold 0%
Member of other MSI's/Organisations International Accord - Bangladesh
Number of complaints received last financial year 3

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? No
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	24	34.48%
India	22	21.76%
China	72	20.29%
Türkiye	9	7.99%
France	9	4.99%
Tunisia	4	4.59%
Morocco	1	2.96%
Romania	1	2.03%
Malaysia	1	0.42%
Italy	2	0.27%
Viet Nam	1	0.21%

Layer 1 Foundational system's criteria

Possible Points: 8
Earned Points: 7

1.1 Member company has a publicly shared Human Rights Due Diligence policy that has been adopted by top management.: No

Comment: Bel&Bo has yet to publish its Human Rights Due Diligence policy.

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: Bel&Bo discloses nearly 85% 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: Bel&Bo discloses nearly 85% 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: 48

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: The member has 146 active suppliers. Almost 28% of the production volume comes from suppliers where the member has at least 10% leverage at suppliers. 47% of the production volume comes from suppliers where Bel&Bo buys less than 2% of its total FOB. Bel&Bo has a sourcing strategy which focuses on consolidation in order to address influencing labour conditions.

Recommendation: Bel&Bo 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: Bel&Bo has a sourcing strategy that focuses on maintaining long-term relationships. 80% of the member's total FOB volume comes from suppliers with whom Bel&Bo has a business relationship for at least five years. The member does not commit to long-term contracts yet.

Recommendation: Fair Wear recommends Bel&Bo 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.	Basic	Human rights due diligence, according to the OECD guidelines, requires companies to undertake a scoping exercise to identify and mitigate potential human rights risks in supply chains of potential business partners.	HRDD policy; Sourcing strategy linked to results of scoping exercise; HRDD processes, including specific responsibilities of different departments; Use of country studies; Analysis of business and sourcing model risks; Use of licensees and/or design collaborations.	2	6	-2

Comment: Bel&Bo conducts risk scoping and includes risk factors based on country and supplier level. The member has identified its main production countries Bangladesh, India, China and Turkey to be high risk. The main risks for Bangladesh identified by the member are Health and Safety, Freedom of Association and discrimination. For China, Bel & Bo considers the same risks and excessive overtime. The member also included precarious work for Turkey. The member has yet to include all risks related to heightened due diligence.

Bel&Bo has yet to include the significance of these risks based on severity and likelihood. The member has yet to broaden its scope of the risk assessment to sector, business model, sourcing model and product levels.

The risk scoping misses a gender lens. To date, Bel&Bo's sourcing strategy does not mention a preference for countries where workers can freely form or join a trade union and/or bargain collectively.

Requirement: Bel&Bo must include all labour standards and sourcing countries in its risk scoping.

Recommendation: Fair Wear recommends Bel&Bo to include all risk factors in its risk scoping. The member is recommended to include input from workers, suppliers, and other stakeholders in its risk-scoping exercise. Fair Wear strongly recommends Bel&B 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 Bel&Bo to inform new suppliers about its HRDD policy and Fair Wear membership by sharing information through their onboarding process. The onboarding process includes sharing its Code of Conduct, the Responsible Business Conduct policy, the supplier self assessment questionnaire, worker information sheets, transparency pledge and the unauthorised subcontracting policy. This process has been followed for all 15 suppliers added last year. Bel&Bo also sources through intermediaries who are close to factories. Occasionally these intermediaries have chosen different factories to source the products at following the onboarding process in the same way as suppliers.

Recommendation: Bel&Bo is recommended to engage in dialogue with all suppliers to mitigate the risk of production being placed elsewhere than agreed.

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

Comment: Bel&Bo collects human rights information of potential new suppliers by collecting self-assessments, existing audit reports, proof that the Worker Information Sheets have been posted and confirm the supplier agrees with its Code of Conduct. Bel&Bo also adjusts sourcing decisions based on the results. For instance, in 2023 an agent suggested to work with a factory in Bangladesh which wasn't covered by the RSC. The member decided not to start sourcing at this factory. The company does not collect information from workers or stakeholders to inform the sourcing decision nor does it assess whether grievance mechanisms are operational. Bel&Bo does not privilege suppliers where workers can exercise their right of FoA.

Recommendation: Fair Wear recommends Bel&Bo to investigate whether an operational grievance mechanism exists. Fair Wear strongly recommends Bel&Bo 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.	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: Bel&Bo has added 15 new suppliers in the last financial year. Bel&Bo 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. Bel&Bo has not yet organised onboarding sessions for its new suppliers to raise awareness about the Fair Wear CoLP, the grievance mechanism, or the importance of social dialogue.

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

Indicators on Identifying continuous human rights risks

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.7 Member company has a system to continuously assess human rights risks in its production locations.	Intermediate	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.	4	6	0

Comment: Bel&Bo has a systematic approach to assessing human rights risks in its supply chain and has assessed the risks for each production location. For its top 30 suppliers where the member sources 70% of its total FOB, the risks are updated each year. These suppliers receive a risk score based on audit outcomes, factory visits, complaints, and an annually updated country risk profile. With the other suppliers the audit score is only monitored. While the member monitors many locations, it has not sufficiently assessed the human rights risks in production locations in Bangladesh, China, India and Turkey, where Fair Wear has a heightened/enhanced monitoring policy. The tools that Bel&Bo uses for its risk assessment do not explicitly include worker, stakeholder and/or supplier input.

Recommendation: Fair Wear strongly recommends that Bel&Bo changes its tools to assess risk when they do not identify risks that are common in the production country. Bel&Bo could complement its risk assessment process with worker, supplier, and stakeholder input.

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

Comment: Bel&Bo 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. Bel&Bo has identified the following risks in the countries: Bangladesh facing government restriction and political pressure, NGOs and civil society groups are limited in operations and reports on harassment and violence against activists and journalists. In China, there is a severe restriction of FoA, a tight government control over civil society organisations, labor unions and associations and independent organisations face a lot of limitations. India has FoA as a fundamental right under the constitution, however recent years has seen more resistance to civil society organisations. Turkey faces significant challenges to freedom of association, with restrictive laws and limited NGO activity due to government intervention.

Bel&Bo understands the status of FoA at each of its suppliers in terms of whether the suppliers are unionised and have an active worker committee. The member has yet to evaluate the influence and impact on a supplier level and apply the gender lens to FoA related risks.

Recommendation: Bel&Bo should include risks specific to women workers in its risk assessment regarding FoA at its suppliers. The member is recommended to assess the status of FoA at the supplier level, understanding the risk at each of its suppliers - for example, through the Supplier Questionnaire (tool 2 in Fair Wear's FoA Guide), modular assessments on Social Dialogue, in-depth discussions with suppliers, or a full or modular assessment.

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

Comment: Bel&Bo actively collects gender data per factory, including the workforce division between men and women and the percentage of women in management positions. This information is collected through the supplier's Self Assessment Questionnaires and surveys from Amfori. The member has yet to identify the specific gender risks per sourcing country on supplier level.

Requirement: Bel&Bo must include gender in its risk scoping and assessment.

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: At the start of each season, the CSR department is involved to discuss and evaluate suppliers. The outcome of this evaluation influences purchasing decisions. This includes which suppliers should receive more or less orders. The risk score of a supplier is also included when placing an order. Suppliers are evaluated with a traffic light system. When the risk is too high, the buying department is not able to place any orders. In other cases, the CSR department is alerted to take appropriate action based on the risk profile of the supplier.

Bel&Bo has not yet shared the outcome of the evaluation with its suppliers and their worker representatives.

Recommendation: Fair Wear recommends Bel&Bo 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.	Intermediate	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.	2	4	0

Comment: Bel&Bo uses the outcomes of its human rights monitoring to respond to unauthorised subcontracting. The buying team has been trained to proactively monitor for subcontracting. The member takes additional measures to prevent unauthorised subcontracting or unknown locations, such as sharing its policy on subcontracting, investigate the need for subcontracting and collecting supplier questionnaires. There was one supplier in India who outsourced production without informing the member first. Bel&Bo collected the audit report of the subcontracting unit and engaged with the supplier on the need to subcontract. Production was halted at this factory but the member is planning on starting production again.

Recommendation: Bel&Bo is required to check capacity in the factory and compare capacity to output, to support a plausibility check whether production probably has taken place in the factory.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.12 Member company extends its due diligence approach to homeworkers.	Intermediate	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.	2	4	0

Comment: Bel&Bo has not identified whether homework is prevalent in its sourcing countries. The member asks its suppliers in the supplier questionnaire whether it uses homeworkers. There was one supplier who responded that it was using homeworkers, but the member has yet to follow up.

Recommendation: Bel&Bo is recommended to ensure suppliers that work with homeworkers do so in a responsible way.

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: Bel&Bo does not use contracts with its suppliers. The member uses order forms to agree on prices, deadlines and deliveries.

Recommendation: Fair Wear strongly recommends Bel&Bo to include the shared responsibility of CoLP implementation in its contracts, including fair payment terms. The member could look to the Supplier Model Contract Clauses for inspiration. Fair Wear recommends the member to enrol in the learning module 'Introduction to responsible contracting in the supply chain'. Fair Wear strongly advises the member brand to include the different agreements in one supplier contract.

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

Comment: There is an active exchange of information between CSR and other departments to enable coherent and responsible business practices. The member has not yet included responsible business practices in job role competencies, nor do sourcing and purchasing staff work with KPIs supporting good sourcing and pricing strategies.

Recommendation: Bel&Bo could include responsible business practices in its job role competencies of sourcing and purchasing staff. Bel&Bo 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.	Basic	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.	2	6	0

Comment: The member collects the available capacity from its suppliers through a questionnaire. The sourcing team creates a detailed plan twice a year including order and delivery dates and order quantities which are shared with the suppliers. The full process takes between 20-22 weeks. When the orders are being produced, Bel&Bo checks in with suppliers to respond to any issues. The member has occasionally received feedback that the factory was overbooked. If delays occur, the member offers to split the orders and occasionally opts for air freight which is paid for by the member.

Recommendation: The member is encouraged to evaluate with the supplier the production process after each season and, where needed, adapt its future planning.

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

Comment: Bel&Bo has no understanding of the wage levels at its suppliers and the link to its own buying prices.

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

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: Bel&Bo has informed its sourcing intermediaries of Fair Wear requirements and could show they informed production locations.
Next to that, the intermediaries actively support HRDD and the implementation of the CoLP by collaborating on consolidation, collecting necessary audit reports and remediating CAPs.

Layer 3 Prevention, mitigation and remediation

Possible Points: 90
Earned Points: 20

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.	Advanced	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.	6	6	0

Comment: Bel&Bo has prioritised risks and created action plans per supplier, counting for 75% of the total FOB. These match the member's risk profile. The member company could show it created 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.

Recommendation: Fair Wear recommends the member to further complete and improve its action plans.

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

Comment: Bel&Bo has yet to include a gender lens in action plans.

Requirement: Bel&Bo must start including a gender lens in action plans.

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.	Insufficient	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.	0	6	0

Comment: Bel&Bo has not yet included steps to encourage FoA and effective social dialogue in its action plans.

Requirement: Members must include steps to promote FoA and social dialogue in its action plans. This should be linked with its assessment of risks to FoA and social dialogue as part of its human rights monitoring (see indicator 2.8). Examples of steps that could be included can be found in Fair Wears brand guide on FoA and social dialogue.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.4 Member company actively supports a factory-level grievance mechanism.	Basic	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.	2	6	0

Comment: Bel&Bo has assessed if an operational factory-level grievance mechanism exist for its top 30 suppliers which accounts for over 70% of is FOB. The member also monitors how many complaints were logged but has yet to evaluate the effectiveness of the mechanisms.

Requirement: The member needs to assess the existence and functioning of factory-level grievance mechanisms systematically; it also needs to support and monitor its functioning.

Recommendation: Fair Wear recommends Bel&Bo to always involve suppliers and worker representatives in the assessment of the factory-level grievance mechanism and to share and discuss the outcome of the assessment with the above stakeholders, who should be encouraged to lead a discussion on how the mechanisms can be improved.

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

Comment: Bel&Bo cooperates with other Fair Wear members at its shared suppliers, responding to CAPs and complaints.

Recommendation: Even though Bel&Bo already works together with other Fair Wear members, Fair Wear recommends to also collaborate with other customers.

Indicators on implementation: improvement and prevention

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.6 Degree of verified actions.	72%	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.	6	6	-2

Comment: During the performance check Bel&Bo could demonstrate it has followed up 72% of actions out of all outstanding actions. These actions are linked to CAPs of full assessments conducted in the previous financial year. For a supplier in India there was a lack of awareness on the CoLP, the grievance mechanism and health & safety. The factory followed up with holding internal training to address this. Bel&Bo also followed up on a finding in Bangladesh where needle protection was missing from the sewing machines and verified that it had been improved. Bel&Bo also followed up on a missing fire prevention certificate in Türkiye.

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

Comment: Bel&Bo has not yet identified root causes of the CAP findings. When the member receives new audit reports, the findings are added to action plans. The member is planning to analyse whether findings are repetitive to identify whether it has a similar root cause. The member has yet to look into this.

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.

Bel&Bo should identify root causes of CAP issues and discuss these with its suppliers. The member needs to start developing preventive actions to address these root causes.

Recommendation: Fair Wear recommends Bel&Bo to identify root causes of 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.	Basic	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.	2	6	0

Comment: Bel&Bo has some suppliers where action plans are not needed. These cover almost 9% of the member's total FOB. The member does not have a system to ensure possible human rights risks are regularly discussed with these suppliers.

Recommendation: Bel&Bo is recommended to create a systematic plan which details at which interval the member will discuss possible human rights risks at its suppliers and which human rights risks should be discussed.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.9 Degree to which member company mitigates root causes of excessive overtime.	Basic	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.	2	6	0

Comment: In the previous year, one audit report mention excessive overtime. For a supplier in Bangladesh, workers did not receive 1 day off per 7 days of work and the total working time per week exceeded 60 hours. The member has followed up to ask whether its own production planning lead to overtime. Since the member has limited FOB in this factory, no further follow up was done. Bel&Bo has not yet analysed or addressed any alternative root causes.

Recommendation: With its suppliers where excessive overtime occurs, Fair Wear recommends Bel&Boo verify whether production is planned with overtime. If production is planned with overtime, the brand should ensure that its products can be produced during regular working hours.

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, one audit in Bangladesh included findings regarding non-payment legally required wage elements. This included a worker not receiving maternity benefits as per law. The member followed up on the finding and the supplier stated to only have paid the maternity leave partially but are providing full benefits as per 2024. Therefore the issue has not been remediated retroactively.

The member has investigated legal minimum wage compliance with its factories and found that this commonly occurred with its factories in China where a social insurance isn't paid. The brand is following up with a policy to ensure their suppliers are paying the legal minimum.

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 resolve that local labour laws are respected. Evidence of remediation must be collected.

Recommendation: Fair Wear strongly recommends Bel&Bo 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.	Insufficient	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.	0	6	0

Comment: Bel&Bo has yet to create an overview of the wage levels at its suppliers and the gap towards the estimated living wage.

Requirement: Bel&Bo should have an overview of wages paid in its production locations.

Recommendation: Fair Wear recommends the member to enrol in the learning module 'Getting started with living wages'. Members can help suppliers maintain their wage levels by, for instance, linking them to relevant governmental support programmes, or offering pre-payments or loans.

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: Bel&Bo does not have an overview of wages paid in production locations. The member is starting to look into this with a living wage project for one of its suppliers planned for the next year.

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: Bel&Bo does not yet contribute to higher wages at any of 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.	Intermediate	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.	2	4	-2

Comment: Bel&Bo received three complaints in Bangladesh in the past financial year about legally binding contracts, wages and no discrimination. The member actively responded to these complaints as per Fair Wear's Complaints Procedure. There was one complaint where another Fair Wear member took the lead, and one complaint which was withdrawn by the complainant after Bel&Bo followed up. The member is currently still in the process of follow up with one complaint as it has not been resolved. There was a factory which closed and workers have not received their outstanding wages fully yet.

Bel&Bo did not yet include the outcome of these complaints to decide on further preventive actions in its supply chain.

Recommendation: Bel&Bo could use the outcome of complaints to determine follow-up actions in its broader action plans.

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

Comment: The member has not yet enrolled any of its suppliers in a training module. The member is planning to include training in its action plans for 2024.

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

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

Comment: Bel&Bo did not implement training at its suppliers.

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

Comment: In the past financial year, the member was in the process of exiting 40 suppliers. The member followed the steps in the responsible exit strategy including assessing the decision to terminate the partnership, the impact on the supplier and agree on a phase-out plan together with the suppliers. The responsible exit strategy only covers suppliers where the member has more than 2% leverage. Therefore only two factories that were exited were followed up accordingly. These two factories merged with other production sites and were renamed, the business relationship therefore continued. Bel&Bo does not include the responsible exit strategy as part of its suppliers' agreement and/or contracts.

Recommendation: Bel&Bo could include the responsible exit strategy as part of its suppliers' agreement or contract.

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

Layer 4 External communication, outreach, learning, and evaluation

Possible Points: 22
Earned Points: 12

Indicators related to communication

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.1 Member company actively communicates about Fair Wear membership.	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: Bel&Bo communicates accurately about Fair Wear membership on its website and social media channels.

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: Bel&Bo 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: Bel&Bo has submitted its social report, which Fair Wear approved. Bel&Bo 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.	Insufficient	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.	0	4	0

Comment: Bel&Bo does not report on factory-level data and remediation results.

Requirement: Bel&Bo 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.

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

Comment: Bel&Bo has a system to track progress and check if implemented measures have been effective in preventing and remediating human rights violations. In its evaluation system, the member does not yet include triangulated information from external sources, such as workers and suppliers.

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

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.6 Level of action/progress made on requirements from previous Brand Performance Check.	Basic	In each Brand Performance Check report, Fair Wear may include requirements for changes to management practices. Progress on achieving these requirements is an important part of Fair Wear membership and its process approach.	Member should show documentation related to the specific requirements made in the previous Brand Performance Check.	0	4	-2

Comment: Bel&Bo followed up on a requirement to ensure that new production locations sign and return the questionnaire before placing first orders. The member also followed up on ensuring the Worker Information Sheet is posted. The member has also confirmed its production locations including all relevant financial data at the end of the financial year. Bel&Bo also followed up on outstanding CAPs.

Bel&Bo has not verified that a finding of non-payment of legal minimum wage was remediated retroactively. Bel&Bo has also not yet assessed the root causes of wages lower than living wage or linked its buying prices to wages. Bel&Bo also has not determined and financed wage increases.

The member has not yet followed up on a previous requirement to conduct risk scoping before placing the first order. The member has also yet to investigate further what the root causes are of excessive overtime.

Together, less than half of the requirements were addressed.

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.

It is required to work towards remediation of previous requirements from the last Brand Performance. The requirements included in this check need to be 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.: 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

Bel&Bo recommends to have more engagement with the Fair Wear team. It also would benefit from more engagement with other companies.

Brand Performance Check details

Date of Brand Performance Check: **28-08-2024**
Conducted by: **Kathleen Gabriel**