



## **Brand Performance Check**

### **Bel&Bo-Fabrimode NV**

**Publication date: January 2023**

This report covers the evaluation period 01-02-2021 to 31-01-2022

## 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](http://www.fairwear.org). The online [Brand Performance Check Guide](#) provides more information about the indicators.

*This year's report covers the response of our members and the impact on their supply chain due to the COVID-19 pandemic which started in 2020. The COVID-19 pandemic limited the brands' ability to visit and audit factories. To ensure the monitoring of working conditions throughout the pandemic, Fair Wear and its member brands made use of additional monitoring tools, such as complaints reports, surveys, and the consultation of local stakeholders. These sources may not provide as detailed insights as audit reports. To assess outcomes at production location level, we have included all available types of evidence to provide an accurate overview of the brands' management systems and their efforts to improve working conditions. Nevertheless, brands should resume verifying working conditions through audits when the situation allows for.*

## Brand Performance Check Overview

### Bel&Bo-Fabrimode NV

**Evaluation Period: 01-02-2021 to 31-01-2022**

Member company information	
Headquarters:	Deerlijk , Belgium
Member since:	2014-11-30
Product types:	Garments, clothing, fashion apparel
Production in countries where Fair Wear is active:	Bangladesh, China, India, Romania, Tunisia, Turkey
Production in other countries:	France, Italy, Malaysia, Morocco, Poland, Taiwan
Basic requirements	
Workplan and projected production location data for upcoming year have been submitted?	Yes
Actual production location data for evaluation period was submitted?	Yes
Membership fee has been paid?	Yes
Scoring overview	
% of own production under monitoring	44%
Benchmarking score	27
Category	Needs Improvement

## Summary:

Bel&Bo-Fabrimode NV (Bel&Bo) has shown insufficient progress on the performance check indicators, leading to a benchmark score of 27 points. As a result, Bel&Bo is placed in the 'Needs Improvement' category. The member has monitored 44% of its supply chain.

## Corona Addendum:

In 2021, Bel&Bo's situation improved from the previous year. The member did not terminate staff, and the CSR staff could work again without technical unemployment. Bel&Bo did not cancel orders.

Bel&Bo prioritised the relationships with its suppliers over short-term profit. Bel&Bo could demonstrate that there was no delay in payments. When sales went down in 2020, Bel&Bo kept the excess products for the following year. Bel&Bo provided flexibility in lead time to support its suppliers, caused mainly by wrong yarns, energy issues at the factories and logistics. Bel&Bo conducted online meetings with the main direct suppliers to identify their needs for support and the risks of labour rights violations. The interviews focused on three topics: orders (feedback on purchasing practice), health & safety, and wage payments.

The biggest challenge in 2021 for Bel&Bo was that due to some restrictions, travel was not possible and direct dialogue with the suppliers was difficult. The member asked its agents if audits were trustworthy and reliable. The member conducted six Fair Wear audits in 2021. Bel&Bo's systems were not sufficiently able to identify, address and remediate the most critical issues at its suppliers. After lockdowns in Turkey and India, the brand contacted its suppliers but did not ask for proof that suppliers paid wages correctly. In general, Bel&Bo did not conduct the COVID-19 follow-up regularly.

Bel&Bo did not continue its project on living wages.

Fair Wear recommends that Bel&Bo sets up a general HRDD system, including regular monitoring, CAP follow-up, and updating its risk assessment regularly and on-demand. Besides, linking the risks to its suppliers and defining actions to prevent and mitigate supplier- and country-specific risks such as excessive overtime, forced labour, migrant labour and the lack of social dialogue, freedom of association and collective bargaining.

## Performance Category Overview

**Leader:** This category is for member companies who are doing exceptionally well, and are operating at an advanced level. Leaders show best practices in complex areas such as living wages and freedom of association.

**Good:** It is Fair Wear's belief that member companies who are making a serious effort to implement the Code of Labour Practices—the vast majority of Fair Wear member companies—are 'doing good' and deserve to be recognized as such. They are also doing more than the average clothing company, and have allowed their internal processes to be examined and publicly reported on by an independent NGO. The majority of member companies will receive a 'Good' rating.

**Needs Improvement:** Member companies are most likely to find themselves in this category when major unexpected problems have arisen, or if they are unable or unwilling to seriously work towards CoLP implementation. Member companies may be in this category for one year only after which they should either move up to Good, or will be moved to suspended.

**Suspended:** Member companies who either fail to meet one of the Basic Requirements, have had major internal changes which means membership must be put on hold for a maximum of one year, or have been in Needs Improvement for more than one year. Member companies may remain in this category for one year maximum, after which termination proceedings will come into force.

Categories are calculated based on a combination of benchmarking score and the percentage of own production under monitoring. The specific requirements for each category are outlined in the Brand Performance Check Guide.

## 1. Purchasing Practices

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.1a Percentage of production volume from production locations where member company buys at least 10% of production capacity.	28%	Member companies with less than 10% of a production location's production capacity generally have limited influence on production location managers to make changes.	Supplier information provided by member company.	2	4	0

**Comment:** Bel&Bo is a family-owned fashion apparel brand with a broad product range. The member sources from suppliers where it buys at least 10% of production capacity, producing 28% of the member's total order volume, which applies to 12 out of 156 factories. The percentage decreased from 41% to last year.

**Recommendation:** Fair Wear recommends that Bel&Bo consolidate its supplier base where possible and increases leverage at main production locations to effectively request improvements in working conditions. It is advised to describe the process of consolidation in a sourcing strategy that is agreed upon with top management/sourcing staff.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.1b Percentage of production volume from production locations where member company buys less than 2% of its total FOB.	43%	Fair Wear provides incentives to clothing brands to consolidate their supplier base, especially at the tail end, as much as possible, and rewards those members who have a small tail end. Shortening the tail end reduces social compliance risks and enhances the impact of efficient use of capital and remediation efforts.	Production location information as provided to Fair Wear.	0	4	0

**Comment:** Bel&Bo decreased the percentage of production in tail-end suppliers gradually in the last few years. The member sources from production locations where it buys less than 2% of production capacity that together produce 43% of the member's total order volume which is valid for 141 factories out of 156. This is a slight decrease from 44% in 2020.

**Recommendation:** Fair Wear recommends Bel&Bo consolidate its supply base by limiting the number of production locations in its 'tail end'. To achieve this, Bel&Bo should determine whether production locations where it buys less than 2% of its FOB are strategically relevant. Shortening the tail will reduce the social compliance risks the member is exposed to and allow the member to improve working conditions more efficiently and effectively.



Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.2 Percentage of production volume from production locations where a business relationship has existed for at least five years.	80%	Stable business relationships support most aspects of the Code of Labour Practices, and give production locations a reason to invest in improving working conditions.	Supplier information provided by member company.	4	4	0

**Comment:** Bel&Bo is making steady improvements in increasing the duration of its relationships with its suppliers. 80% of the member's total order volume is placed at suppliers where there has been a business relationship of at least five years, 8% higher than in 2020.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.3 All (new) production locations are required to sign and return the questionnaire with the Code of Labour Practices before first bulk orders are placed.	No	The CoLP is the foundation of all work between production locations and brands, and the first step in developing a commitment to improvements.	Signed CoLPs are on file.	0	2	0

**Comment:** Bel&Bo sends out the questionnaire about FW membership and CoLP to all its new suppliers and intermediaries to be signed before starting production. Bel&Bo has started with 30 new production locations in seven countries in the last financial year. Fair Wear has sampled ten factories and verified that the new suppliers have signed and returned the questionnaires. At one factory, the signature was missing. All questionnaires from subcontractors are missing.

**Requirement:** Bel&Bo must ensure that new production locations sign and return the questionnaire before placing first orders. This requirement also applies to subcontractors. Fair Wear advises Bel&Bo to collect information on subcontractors and discuss it with the suppliers and intermediaries.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.4 Member company conducts human rights due diligence at all (new) production locations before placing orders.	Intermediate	Due diligence helps to identify, prevent and mitigate potential human rights problems at suppliers.	Documentation may include pre-audits, existing audits, other types of risk assessments.	2	4	0

**Comment:** Bel&Bo works with direct production locations and with indirect production locations through intermediaries. For direct new suppliers, Bel&Bo staff visits the factories before making decisions. For indirect new suppliers, the agents recommend potential suppliers, while Bel&Bo assesses the working conditions through documentation submitted by the potential suppliers. The required documents include the suppliers' self-evaluation reports, the commitment to Fair Wear requirements (the questionnaire and the Code of Labour Practices), audit reports if available, and the signatory of the Bangladesh Accord if the factory is in Bangladesh. The CSR department can track all the records and communicate with the production department frequently. Bel&Bo's purchasing department can only place an order when the potential supplier meets all the requirements to submit working condition information.

Bel&Bo started with 14 new factories in China. The risk of forced labour and freedom of association was not further investigated and was not part of the sourcing decisions.

To mitigate the risk of COVID-19, Bel&Bo collected risk-related information using Fair Wear's COVID dossier and Fair Wear's supplier questionnaire as a basis to communicate with suppliers. Bel&Bo organised online meetings to interview its main direct suppliers. Bel&Bo chose these suppliers because Bel&Bo has a higher leverage and can provide help if needed.

**Requirement:** Members are required to conduct a risk assessment of the impact of COVID-19 on its suppliers, identifying the most urgent issues per supplier.

**Recommendation:** Risk analysis as part of the decision-making process of selecting new production locations is an important step to mitigate risk and prevent potential problems. Fair Wear recommends that Bel&Bo clearly defines preventive actions for identified risks and connects them to sourcing decisions. This also includes strategies to tackle structural risks such as low wage levels in the country, limited freedom of association and restricted civil society that are beyond the brand's individual sphere of influence. Fair Wear advises using information from Fair Wear country studies and wage ladders and the Fair Wear Health and Safety guidelines. Bel&Bo can use the CSR Risk Check (<https://www.mvorisicochecker.nl/en/risk-check>) to further assess risks in (potentially new) sourcing countries. For gender risk assessments, Bel&Bo can use the gender toolkit with fact sheets per country, supplier checklists and a model policy on Sexual Harassment. Bel&Bo can cooperate with local stakeholders to further investigate the situation in a specific country.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.5 Production location compliance with Code of Labour Practices is evaluated in a systematic manner.	Yes	A systemic approach is required to integrate social compliance into normal business processes, and supports good decisionmaking.	Documentation of systemic approach: rating systems, checklists, databases, etc.	1	2	0

**Comment:** According to Bel&Bo, the company did not want to lose the working relationships with the suppliers. The member prioritized not cancelling orders due to COVID-19 and ensuring on-time supplier payment. In 2021, Bel&Bo stopped working with 45 factories. There is an internal exit strategy, but Bel&Bo did not inform all factories due to low leverage. Factories also stopped their cooperation with Bel&Bo. Besides, the member had to end the collaboration with suppliers failing within the Bangladesh Accord system. Bel&Bo has no exit strategy policy for its intermediaries. The intermediaries decide on their own which factories produce for Bel&Bo.

Bel&Bo developed its supplier rating tool based on learnings from another Fair Wear member. For direct suppliers, the rating tool includes four main indicators - quality control, logistics, sourcing and CSR (corporate social responsibility). For indirect suppliers, Bel&Bo rates the intermediaries based on five indicators. The extra indicator is a ratio that reflects the degree of consolidation of production locations within the intermediary. Bel&Bo does not yet reward suppliers' performance.

**Recommendation:** Fair Wear encourages Bel&Bo to ensure all relevant staff is informed about the responsible exit strategy, especially intermediaries. Please see [<https://members.fairwear.org/resources/responsible-exit-strategy/5>].

As it is not always possible to reward suppliers with more volumes, Bel&Bo could also look into other incentives that reward suppliers' commitment towards the CoLP. An example would be to offer training for skill building/capacity development, placing more NOS styles. Besides, Fair Wear recommends discussing the outcome of the evaluation with the suppliers.

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

**Comment:** Bel&Bo shared annual production plans with all suppliers in advance. A staff member frequently updates production information to the suppliers. Bel&Bo did not use standard production minutes per style to calculate the required production time.

During COVID-19, Bel&Bo did not cancel confirmed orders. The member wanted to maintain long-term relationships with the suppliers and support them as partners. To help the suppliers, Bel&Bo accepted late shipments in case of unexpected events such as lockdowns, fabric delays or workforce issues. The member increased its stock for delayed orders, which Bel&Bo could not sell anymore in its shops.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.7 Degree to which member company mitigates root causes of excessive overtime.	Insufficient efforts	Some production delays are outside of the control of member companies; however there are a number of steps that can be taken to address production delays without resorting to excessive overtime.	Evidence of how member responds to excessive overtime and strategies that help reduce the risk of excessive overtime, such as: root cause analysis, reports, correspondence with factories, etc.	0	6	0

**Comment:** Fair Wear audits found excessive overtime or inconsistent working hour records at most suppliers of Bel&Bo in the last three years. The member did not analyse the root causes of overtime at its factories. Besides, Bel&Bo forwarded the audit report and CAPs but did not follow up on the overtime findings. Suppliers were encouraged to inform Bel&Bo when production problems might cause overtime. The member was flexible with the delivery times when the supplier reported issues.

**Requirement:** Bel&Bo should investigate to what extent its current buying practices affect the working hours at the supplier level. The member should analyse the root cause of excessive overtime to define the most effective steps to reduce overtime.

**Recommendation:** Besides discussing with the supplier, Fair Wear strongly recommends that Bel&Bo actively take measures when excessive overtime is found. Taking measures to ensure that Bel&Bo knows and shows whether excessive overtime occurs at a supplier is key in resolving the issue. Actions such as regular checks by a local technician, document checking and interviewing workers help assess whether excessive overtime occurs.

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

**Comment:** Bel&Bo had made progress towards understanding the concepts of labour costing through participating in the Fair Price App workshop for Fair Wear members. Bel&Bo's factories, in general, do not work with fact-based costing yet. Therefore, the member started discussing fact-based costing with one partner in Tunisia. The CSR manager evaluated the wage levels for five factories, including the paid wages, the minimum wage and target wages by Anker or union trade demand. The member does not know the sewing minutes of a product. Bel&Bo explained that prices are set by the suppliers and then negotiated. According to Bel&Bo, suppliers increase prices if needed, e.g. due to COVID-19.

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.9 Member company actively responds if production locations fail to pay legal minimum wages and/or fail to provide wage data to verify minimum wage is paid.	No	If a supplier fails to pay minimum wage or minimum wage payments cannot be verified, Fair Wear member companies are expected to hold management of the supplier accountable for respecting local labour law. Payment below minimum wage must be remediated urgently.	Complaint reports, CAPs, additional emails, Fair Wear Audit Reports or additional monitoring visits by a Fair Wear auditor, or other documents that show minimum wage issue is reported/resolved.	-2	0	-2

**Comment:** Fair Wear audits in 2021 found that a factory in India did not pay all workers minimum wages during COVID-19 lockdowns. Besides, Fair Wear could not verify wages for a factory in Turkey because the supplier did not keep the time records during the pandemic period. Bel&Bo did not actively ask for payslips during the lockdowns in India and Turkey and during the power cuts in China. The member did not follow up on the findings in the CAPs.

**Requirement:** Please note that following Fair Wear's policy for repeated non-compliance in Fair Wear's Brand Performance Checks, members that receive an insufficient or -2 score on this indicator for the second year in a row will be placed in the 'Needs Improvement' category.

In the context of COVID-19, the member is expected to analyse the risks related to non-payment of minimum wage in its sourcing countries and connect the risk (for example, long-term factory closure in a country) to its own suppliers. When suppliers indicate no problem in paying legal minimum wages while it is a high-risk area, the member is expected to request evidence of wages paid.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.10 Evidence of late payments to suppliers by member company.	No	Late payments to suppliers can have a negative impact on production locations and their ability to pay workers on time. Most garment workers have minimal savings, and even a brief delay in payments can cause serious problems.	Based on a complaint or audit report; review of production location and member company financial documents.	0	0	-1

**Comment:** Bel&Bo has not changed any payment terms for the suppliers and made sure the suppliers were paid on time just as before the pandemic. The member could demonstrate a sample of payments made within the agreed payment term, showing evidence such as invoices and bank transfer dates.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.11 Degree to which member company assesses and responds to root causes for wages that are lower than living wages in production locations.	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	Evidence of how payment below living wage was addressed, such as: Internal policy and strategy documents, reports, correspondence with factories, etc	0	6	0

**Comment:** Bel&Bo discussed the topic of living wages with some of its suppliers. The member did not discuss the root causes of wages being below living wages with its suppliers due to the kind of partnership, especially with intermediaries and due to low leverage at most of the suppliers. Bel&Bo did not specifically address the impact of the pandemic as a root cause of wages being below living wages.

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.12 Percentage of production volume from factories owned by the member company (bonus indicator).	None	Owning a supplier increases the accountability and reduces the risk of unexpected CoLP violations. Given these advantages, this is a bonus indicator. Extra points are possible, but the indicator will not negatively affect an member company's score.	Supplier information provided by member company.	N/A	2	0

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.13 Member company determines and finances wage increases.	None	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach.	Evidence of how payment below living wage was addressed, such as: internal policy and strategy documents, reports, correspondence with factories, etc.	0	6	0

**Comment:** Bel&Bo has not determined and financed any wage increase at the suppliers.

**Requirement:** In case Bel&Bo buys exclusively at a production location, the member company has full influence over the wages and should be able to cost for a living wage.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.14 Percentage of production volume where the member company pays its share of the target wage.	0%	Fair Wear member companies are challenged to adopt approaches that absorb the extra costs of increasing wages.	Member company's own documentation, evidence of target wage implementation, such as wage reports, factory documentation, communication with factories, etc.	0	6	0

**Comment:** Bel&Bo has not yet paid its share of the target wage at a supplier.

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## Purchasing Practices

**Possible Points: 52**

**Earned Points: 9**

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## 2. Monitoring and Remediation

Basic measurements	Result	Comments
% of production volume where an audit took place.	40%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.	4%	To be counted towards the monitoring threshold, FWF low-risk policy should be implemented. See indicator 2.9. (N/A = no production in low risk countries.)
Member meets monitoring requirements for tail-end production locations.	Standard monitoring below 80%	Monitoring threshold below 80%.
Requirement(s) for next performance check		
Total monitoring threshold:	44%	Measured as percentage of production volume (Minimums: 1 year: 40%; 2 years 60%; 3 years+: 80-100%)

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.1 Specific staff person is designated to follow up on problems identified by monitoring system.	Yes	Followup is a serious part of Fair Wear membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	2	2	-2

**Comment:** The CSR manager is designated to follow up on problems identified by the monitoring system.

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

**Comment:** Bel&Bo makes use of Fair Wear audits or external audits.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.3 Audit Report and Corrective Action Plan (CAP) findings are shared with factory and worker representation where applicable. Improvement timelines are established in a timely manner.	Yes	2 part indicator: Fair Wear audit reports were shared and discussed with suppliers within two months of audit receipt AND a reasonable time frame was specified for resolving findings.	Corrective Action Plans, emails; findings of followup audits; brand representative present during audit exit meeting, etc.	2	2	-1

**Comment:** Bel&Bo has a system to share the Corrective Action Plans and audit reports with the factories within two months after an audit. A reasonable time frame to address the CAP issues is not specified.

**Recommendation:** Before an audit takes place, Bel&Bo is recommended to check with the supplier whether worker representatives are active. This way, they can be involved from the start of an audit and invited to the audit opening and exit meeting. Including workers when following up on audit reports gives them the opportunity to be informed of issues in the factory and have a voice in the prioritization of issues.

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

**Comment:** Due to the COVID-19 pandemic, Bel&Bo could not visit the factories. The member communicated only at the beginning of 2021 with some of the factories on remediating the audit findings. No sufficient follow-up on CAPs took place. Bel&Bo has conducted phone interviews at all direct suppliers regarding COVID-19-related issues, mainly factory closure time, wage payments and virus prevention measures. Especially during lockdowns, Bel&Bo did not request sufficient information like payslips and time records. It was not possible to conclude that there was no violation. Several suppliers raised problems such as material shortages. Bel&Bo adjusted delivery time accordingly to support these suppliers.

**Requirement:** Please note that following Fair Wear's policy for repeated non-compliance in Fair Wear's Brand Performance Checks, members that receive an insufficient or -2 score on this indicator for the second year in a row will be placed in the 'Needs Improvement' category.

Resolving and remediating non-compliances is one of the most important criteria member companies can do to improve working conditions. Fair Wear expects Bel&Bo to examine and support remediation of any problem encountered. Coordinated efforts between different departments are required to ensure sustained responses to CAPs. Issues related to COVID-19 should not be considered solved without adequate verification.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.5 Percentage of production volume from production locations that have been visited by the member company in the previous financial year.	not applicable	Due to the Covid-19 pandemic, brands could often not visit their suppliers from March - December 2020. For consistency purposes, we therefore decided to score all our member brands N/A on visiting suppliers over the year 2020.	Member companies should document all production location visits with at least the date and name of the visitor.	N/A	4	0

**Comment:** As travel was restricted due to the COVID-19 pandemic, this indicator is not applicable in 2021.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.6 Existing audit reports from other sources are collected.	Yes	Existing reports form a basis for understanding the issues and strengths of a supplier, and reduces duplicative work.	Audit reports are on file; evidence of followup on prior CAPs. Reports of quality assessments.	1	3	0

**Comment:** Bel&Bo collected some existing audit reports from other sources, but did not assess the report quality. Within the BSCI platform the brand could only show short audit report summaries and no CAPs; some findings were followed up through email.

**Recommendation:** Existing reports form a basis for understanding the issues and strengths of a supplier, and reduces double work. Existing audits can be counted towards the monitoring threshold if the quality of the report is assessed using the Fair Wear audit quality tool and corrective actions are implemented.

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

**Comment:** Bangladesh:

Bel&Bo identified fire and building safety as high risk in Bangladesh. It has signed the Bangladesh Accord on Fire and Building Safety, including the 2018 so-called Transition Accord (hereafter: Accord). Bel&Bo works with all suppliers to implement changes required by the Accord. The brand also identified excessive overtime and wage payment as high risks. Bel&Bo uses audits to monitor the situation and engages with key suppliers to discuss improvements towards living wages. In addition, the risk of gender-based violence is high. Bel&Bo and the local Fair Wear team have set up and support anti-harassment committees for some factories. The member is unsure if an anti-harassment committee exists for factories without training.

Abrasive blasting:

Bel&Bo has a policy on abrasive blasting. All denim suppliers have signed agreements on not using abrasive blasting. The QC of the member cross-checked products to verify that other methods of fabric treatment were in place.

Turkey:

Around 7% of the total FOB came from Turkey in 2021. Bel&Bo has a general policy on discrimination. The member is not aware of active subcontractors; it has not developed specific systems to mitigate the risks of undocumented workers. Besides, the member did not conduct migrant refugee training at Turkish suppliers.

Other countries:

Bel&Bo purchased from 12 countries in 2021. Bel&Bo uses Fair Wear country studies generally to identify risks. The member did not follow up on risks actively and did not make a risk assessment so far.

Dealing with COVID -19 risks:

Bel&Bo has attended Fair Wear's workshops and studied the Fair Wear COVID dossier to learn about the risks. To identify specific risks per factory, Bel&Bo had made phone interviews with the majority of the suppliers. (See more details in 1.4). Bel&Bo did not sufficiently follow up on the identified COVID -19 risks, especially during the lockdowns in India and Turkey.

**Requirement:** Please note that following Fair Wear's policy for repeated non-compliance in Fair Wear's Brand Performance Checks, members that receive an insufficient or -2 score on this indicator for the second year in a row will be placed in the 'Needs Improvement' category.

Fair Wear advises Bel&Bo to share and discuss its Syrian and migrant workers policy with all its Turkish suppliers and ensure that agents and intermediates do the same. Besides, it is essential to identify all subcontractors in use.

Bel&B must first address the most urgent findings, following its prioritization of COVID-19 issues in collaboration with suppliers. Eventually, the member should show additional steps to remediate all COVID-19-related issues.

**Recommendation:** Bel&Bo should ensure that suppliers in India have sufficient knowledge and a functional system to promote gender equality and prevent gender-based violence. A functional system to prevent violence needs the involvement of both factory management and workers' representatives. Fair Wear has extensive experience supporting employees and employers in setting up functional Anti-Harassment Committees. Fair Wear could provide training and regular support to suppliers upon request.

Fair Wear recommends that Bel&Bo conduct migrant refugee training at its Turkish suppliers and follow up accordingly.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.8 Member company cooperates with other FWF member companies in resolving corrective actions at shared suppliers.	Active cooperation	Cooperation between customers increases leverage and chances of successful outcomes. Cooperation also reduces the chances of a factory having to conduct multiple Corrective Action Plans about the same issue with multiple customers.	Shared CAPs, evidence of cooperation with other customers.	2	2	-1

**Comment:** Bel&Bo cooperated with other Fair Wear members in resolving corrective actions at shared suppliers.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.9 Percentage of production volume where monitoring requirements for low-risk countries are fulfilled.	100%	Low-risk countries are determined by the presence and proper functioning of institutions which can guarantee compliance with national and international standards and laws. Fair Wear has defined minimum monitoring requirements for production locations in low-risk countries.	Documentation of visits, notification of suppliers of Fair Wear membership; posting of worker information sheets, completed questionnaires.	2	2	0

**Member undertakes additional activities to monitor suppliers.:** No (o)

**Comment:** Bel&Bo has fulfilled all monitoring requirements for 100% of the total production volume in low-risk countries.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.10 Extra bonus indicator: in case FWF member company conducts full audits at tail-end production locations (when the minimum required monitoring threshold is met).	No	Fair Wear encourages its members to monitor 100% of its production locations and rewards those members who conduct full audits above the minimum required monitoring threshold.	Production location information as provided to Fair Wear and recent Audit Reports.	N/A	2	0

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.11 Questionnaire is sent and information is collected from external brands resold by the member company.	No external brands resold	Fair Wear believes it is important for affiliates that have a retail/wholesale arm to at least know if the brands they resell are members of Fair Wear or a similar organisation, and in which countries those brands produce goods.	Questionnaires are on file.	N/A	2	0

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.12 External brands resold by member companies that are members of another credible initiative (% of external sales volume).	No external brands resold	Fair Wear believes members who resell products should be rewarded for choosing to sell external brands who also take their supply chain responsibilities seriously and are open about in which countries they produce goods.	External production data in Fair Wear's information management system. Documentation of sales volumes of products made by Fair Wear or FLA members.	N/A	3	0

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.13 Questionnaire is sent and information is collected from licensees.	No licensees	Fair Wear believes it is important for member companies to know if the licensee is committed to the implementation of the same labour standards and has a monitoring system in place.	Questionnaires are on file. Contracts with licensees.	N/A	1	0

## Monitoring and Remediation

**Possible Points: 26**

**Earned Points: 9**

### 3. Complaints Handling

Basic measurements	Result	Comments
Number of worker complaints received since last check.	2	At this point, FWF considers a high number of complaints as a positive indicator, as it shows that workers are aware of and making use of the complaints system.
Number of worker complaints in process of being resolved.	8	
Number of worker complaints resolved since last check.	1	

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.1 A specific employee has been designated to address worker complaints.	Yes	Followup is a serious part of Fair Wear membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	1	1	-1

**Comment:** There is a specific employee responsible for handling worker complaints.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.2 Member company has informed factory management and workers about the FWF CoLP and complaints hotline.	No	Informing both management and workers about the Fair Wear Code of Labour Practices and complaints hotline is a first step in alerting workers to their rights. The Worker Information Sheet is a tool to do this and should be visibly posted at all production locations.	Photos by company staff, audit reports, checklists from production location visits, etc.	-2	2	-2

**Comment:** Bel&Bo and its intermediaries check during visits to some suppliers whether the supplier posted the Worker Information Sheets (WIS) at accessible locations in the factory. The member had limited possibility of making visits in 2021. Bel&Bo has started with 30 new suppliers in seven countries. Fair Wear has sampled ten factories and verified that the factories posted the Worker Information Sheet. At one factory, the WIS was missing. Bel&Bo sometimes shared the WIS in English but not in the local language of the suppliers. The member could not show the posted Worker Information Sheet from subcontractors.



**Requirement:** Please note that following Fair Wear's policy for repeated non-compliance in Fair Wear's Brand Performance Checks, members that receive an insufficient or -2 score on this indicator for the second year in a row will be placed in the 'Needs Improvement' category.

Bel&Bo must ensure that the Worker Information Sheet, including contact information of the local complaints handler of Fair Wear, is posted in all active factories, including subcontractors, in a location accessible to all workers. Bel&Bo should check during a visit whether the factories posted the Worker Information Sheet.

**Recommendation:** Fair Wear advises Bel&Bo to forward the WIS in the local language and upload all WIS in the Fair Wear system.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.3 Degree to which member company has actively raised awareness of the FWF CoLP and complaints hotline.	All production in low-risk countries/training not possible	After informing workers and management of the Fair Wear CoLP and the complaints hotline, additional awareness raising and training is needed to ensure sustainable improvements and structural worker-management dialogue.	Training reports, Fair Wear's data on factories enrolled in the WEP basic module. For alternative training activities: curriculum, training content, participation and outcomes.	N/A	6	0

**Comment:** Because of travel restrictions in 2021 that limited the possibility of conducting training, this indicator is not applicable in 2021.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.4 All complaints received from production location workers are addressed in accordance with the FWF Complaints Procedure.	Yes	Providing access to remedy when problems arise is a key element of responsible supply chain management. Member company involvement is often essential to resolving issues.	Documentation that member company has completed all required steps in the complaints handling process.	3	6	-2

**Comment:** Bel&Bo received two new complaints since the last check. One complaint was at a supplier in India, which was closed as the Fair Wear full verification audit did not support the claims received from the complainant. There were eight active complaints in 2021 from different workers of one factory located in Bangladesh. Seven of these complaints are still under evaluation since 2020. These were about various issues such as wages, health & safety, and the employment relationship. These issues were mostly due to outstanding payments to the workers at the time of COVID-19. The factory had reduced orders during the pandemic, and it did not pay all workers as legally required. Bel&Bo sources through agents at this factory, and it has low leverage. Bel&Bo reacted timely upon receiving the complaints. It has also contacted another Fair Wear member sourcing from the same factory to collaborate on the complaints. Bel&Bo is in the process of resolving all the complaints but stopped for almost a year as the cooperation with the supplier got affected by the complaints. Preventive steps have not yet been taken. More details of the complaints can be found on the Fair Wear website.

**Recommendation:** Fair Wear recommends that Bel&Bo uncovers the root causes of complaints and prevents them from recurring.

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

**Comment:** Bel&Bo worked with one Fair Wear member to deal with the complaints.

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## Complaints Handling

**Possible Points: 11**

**Earned Points: 4**

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## 4. Training and Capacity Building

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.1 All staff at member company are made aware of FWF membership.	Yes	Preventing and remediating problems often requires the involvement of many different departments; making all staff aware of Fair Wear membership requirements helps to support cross-departmental collaboration when needed.	Emails, trainings, presentation, newsletters, etc.	1	1	0

**Comment:** All staff are aware of Fair Wear membership.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.2 All staff in direct contact with suppliers are informed of FWF requirements.	Yes	Sourcing, purchasing and CSR staff at a minimum should possess the knowledge necessary to implement Fair Wear requirements and advocate for change within their organisations.	Fair Wear Seminars or equivalent trainings provided; presentations, curricula, etc.	2	2	-1

**Comment:** Bel&Bo informed all staff in direct contact with suppliers of Fair Wear requirements.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices.	Yes	Agents have the potential to either support or disrupt CoLP implementation. It is the responsibility of member company to ensure agents actively support the implementation of the CoLP.	Correspondence with agents, trainings for agents, Fair Wear audit findings.	1	2	0

**Comment:** Agents of Bel&Bo are required to learn about Fair Wear and the Code of Labour Practices. The agents are involved in the monitoring but are not actively involved in the CAP follow-up. The CSR department keeps the agents updated.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.4 Factory participation in training programmes that support transformative processes related to human rights.	All production in low-risk countries/training not possible	Complex human rights issues such as freedom of association or gender-based violence require more in-depth trainings that support factory-level transformative processes. Fair Wear has developed several modules, however, other (member-led) programmes may also count.	Training reports, Fair Wear's data on factories enrolled in training programmes. For alternative training activities: curriculum, training content, participation and outcomes.	N/A	6	0

**Comment:** Because of travel restrictions in 2021 that limited the possibility of conducting training, this indicator is not applicable in 2021.

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

**Comment:** Two suppliers from Bel&Bo participated in a WEP violence and Harassment prevention training in Bangladesh. Both pieces of training were planned for 2021 and are still in progress. Therefore Bel&Bo will follow up at a later stage.

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## Training and Capacity Building

**Possible Points: 5**

**Earned Points: 4**

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## 5. Information Management

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

**Comment:** Bel&Bo is working with more than 150 suppliers. Bel&Bo works with intermediaries that decide in which factory production is running. Bel&Bo does not allow subcontracting. It informed the intermediaries as well as all direct and indirect factories. All factories were required to fill in the Fair Wear questionnaire, commit to the Code of Labour Practices and agree not to subcontract. The audits found that some factories use external units for specific production processes, such as embroidery, printing and washing. The factories did not inform Bel&Bo about the practice. All subcontractors (like embroidery printing and washing) are missing from the Fair Wear database.

**Requirement:** Please note that following Fair Wear's policy for repeated non-compliance in Fair Wear's Brand Performance Checks, members that receive an insufficient or -2 score on this indicator for the second year in a row will be placed in the 'Needs Improvement' category.

After the end of each financial year, Bel&Bo must confirm its list of production locations and provide relevant financial data. A complete list means ALL production locations are included of all production processes the member uses in the stages after fabric production.

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

**Comment:** CSR and other relevant staff share information about working conditions at production locations.

## Information Management

**Possible Points: 7**

**Earned Points: -1**

## 6. Transparency

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

**Comment:** Bel&Bo complies with Fair Wear's communication policy.

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

**Comment:** Bel&Bo has followed the Fair Wear transparency policy to share its supplier list. The member disclosed 100% of its factories to other member brands internally in FairForce and 100% on the Fair Wear website. Bel&Bo published the brand performance report on its website.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.3 Social Report is submitted to FWF and is published on member company's website.	Complete and accurate report submitted to FWF AND published on member's website.	The social report is an important tool for members to transparently share their efforts with stakeholders. Member companies should not make any claims in their social report that do not correspond with Fair Wear's communication policy.	Social report that is in line with Fair Wear's communication policy.	2	2	-1



**Comment:** The social report has been submitted to Fair Wear and published on the website.

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## **Transparency**

**Possible Points: 6**

**Earned Points: 6**

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## 7. Evaluation

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
7.1 Systemic annual evaluation of FWF membership is conducted with involvement of top management.	Yes	An annual evaluation involving top management ensures that Fair Wear policies are integrated into the structure of the company.	Meeting minutes, verbal reporting, Powerpoints, etc.	2	2	0

**Comment:** The CEO, management team and the CSR staff annually evaluate its performance on social sustainability based on Fair Wear's requirements.

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

**Comment:** The requirements in the last Brand Performance Check for Bel&Bo were mostly about living wages (1.8, 1.11, 1.13). Bel&Bo has made no improvements on working at the required improvements.

**Requirement:** Bel&Bo is required to work towards remediation of previous requirements from the last Brand Performance Check. Further engagement needs to be taken with regard to the following requirements mentioned in the last Brand Performance Check.

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## Evaluation

**Possible Points: 6**

**Earned Points: 0**

## Recommendations to Fair Wear

Bel&Bo is doing a lot but is not seeing it reflected within the existing indicators. More exchange of best practices would be helpful. Fair Wear should also look at a brand's economic reality. More interaction between Fair Wear and Accord would be good (for example, about responsible exit).

## Scoring Overview

Category	Earned	Possible
Purchasing Practices	9	52
Monitoring and Remediation	9	26
Complaints Handling	4	11
Training and Capacity Building	4	5
Information Management	-1	7
Transparency	6	6
Evaluation	0	6
Totals:	31	113

Benchmarking Score (earned points divided by possible points)
27

Performance Benchmarking Category
Needs Improvement

## Brand Performance Check details

Date of Brand Performance Check:

20-10-2022

Conducted by:

Adele Kolos

Interviews with:

Michel Delfosse (CEO)

Charlotte Delfosse (Sales, CSR board sponsor)

Pauline Delfosse (Head of sourcing)

Inge Destoop (Head of planning)

Tine Buysens (CSR)