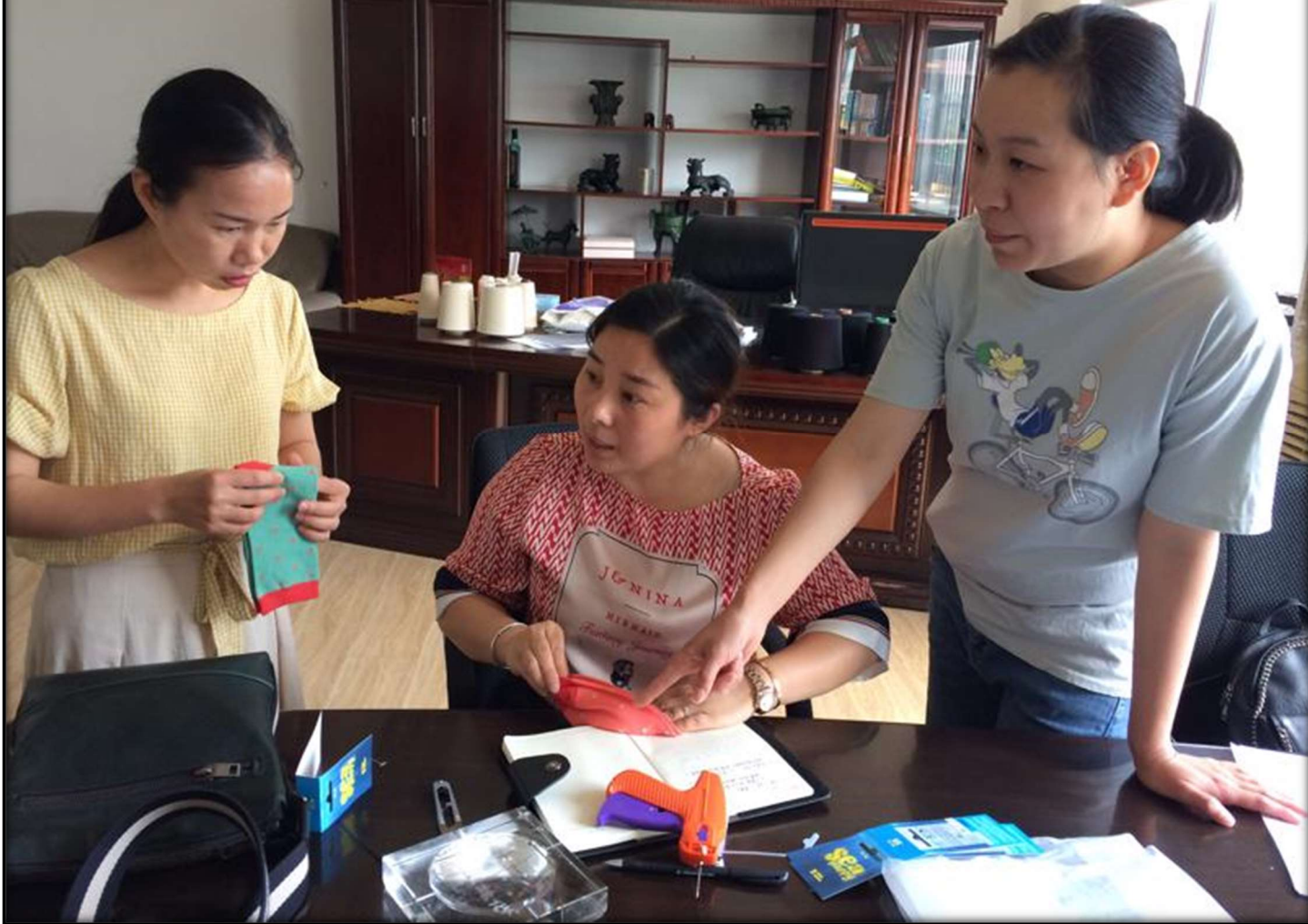


STAR SOCK



SOCIAL REPORT

Start date FWF Membership: 2015

Reporting period (financial year): 2018

www.starsock.com

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The future is in our hands

What can be learned from yesterday, to act on for today and to make it happen for tomorrow.

It is a constant challenge to stay focussed on the future and the place we want to be at, in order for as many as possible to live happily ever after. This final destiny is what makes us going, what makes us act. It is with good reason why I speak about US. It is US altogether, that can make that necessary change.

Realizing that an western company it might seem easy to speak about better choices. Easy because we have so much and someone else has so little. Therefore we feel it as our obligation to gather our strengths and inspire others to join us in this complicated journey. Honestly speaking, I would not call this journey easy. On the contrary it is difficult, by nature we are all price driven (producers and consumers) and impulse driven. Besides that we work in a competitive market, where socks are seen and treated as a commodity product. Adding sustainable choices when there is very little wiggle room, requires an extreme level of persistence.

For me as an individual it is impossible to create a worldwide balance. This needs to be a global dream but being a small scaled business there are many smaller and feasible dreams that might contribute to the bigger picture - the global dream. We can all do small things each day, and step by step, bit by bit it will grow and become meaningful.

In our competitive market it is a great challenge to stick to your believes and keep the right spirit. We stayed true to the choice we made, which is contributing to the necessary change in the textile industry. However, we need additional support: assistance, training and motivators to stick to the plan, stay focussed and book results. We consider Fair Wear Foundation as our training partner, they inspire us to walk the extra mile and check if we are still going into the right direction and make the required steps. Again, it is not always easy and sometimes it takes longer than expected. At this moment we are making goods steps. we are starting to be able to communicate sustainability. The finish line is the big dot on the horizon, we are not there yet, but together we are able to get closer.

Let's stay focussed for tomorrow!

Eric Roosen

1. Achievements & Objectives 2018

The year 2018 will be remembered as a year of change. In this year the business shifted in many ways, from production countries, from materials and from clients. Sustainability was the biggest driver of this shift which is an enormous achievement. Star Sock invested many years in pushing and pulling clients and products to become more sustainable and we finally made it happen on a large scale. Especially socks which are produced to support the Healthy Seas Initiative were increasing. The socks are made of recycled nylon yarn and organic cotton, and produced in Turkey.

This shift also gave us difficulties which we tried to manage in the best way. There came pressure on our existing supply chains due to a lack of orders which inevitably ended into a dismissal of some staff in China, but on the other hand, starting new business with relatively new suppliers to put our knowledge which we had from China to work in new companies where we gained a nice leverage percentage to really change things.

Star Sock is very transparent in its communication towards suppliers and therefore we still can get small things done with less leverage, although the situation gets more complex. We try to keep the relationship going and trust in the future that more orders will come.

Big achievements are

- Delivering solar chargers to all our workers in the factories to thank them for their support and coming back after CNY. On these solar chargers the Fair Wear Foundation code of labour practices were printed with the telephone number so they can contact Fair Wear Foundation at any time.
- Less turnover of staff after Chinese Newyear because they received an extra bonus partly negotiated by Star Sock
- First Fair Wear Foundation audit in Turkey with positive results, although there is still a lot of work to do.
- Increasing leverage in Turkey to make improvements there as we

Iris Vrijzen - Merchandiser Star Sock: Working now for many years at Star Sock and also in the Textile industry, you see the world of Textile is changing. Discussions are starting, it is getting more transparent.

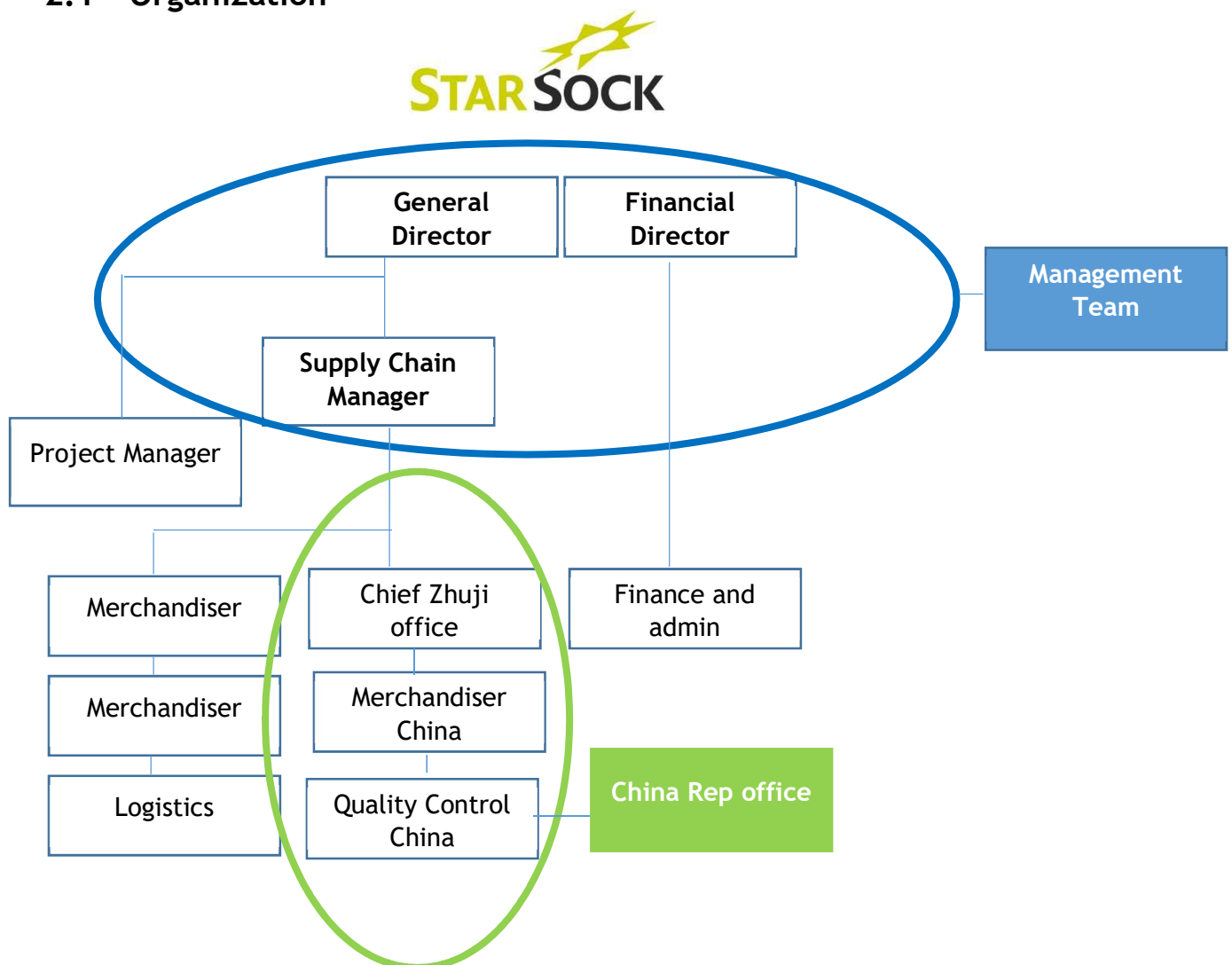
At Star Sock you see in 2018 that there was more awareness at some of our clients, in the past you only talk to the buyer. Then it is difficult to start social discussions because you also negotiate with the same person.

Now we are talking to Buying department, CSR department and management. When you are at one table with all these persons you will get more leverage and support. It is very nice to see the process what than is happening. Everyone is learning and discussing what we can do together, to make steps for a better world!!

2. About Star Sock

Star Sock sells over 15 million pairs of socks every year. Together with the dedicated and enthusiastic teams in Oisterwijk and Zhuji (China) Star Sock strives to continuously innovate; offering surprisingly sustainable socks and ‘worry-free’ processes which contribute to a better world. We help our clients by being successful in selling sustainable socks. We do not keep stock but produce private label products designed according to our clients’ wishes. As licensee we successfully market the sock proposition of various well-known brands such as Gastra and NZA. Besides making socks we respect our environment and actively invest in preserving it for future generations to enjoy.

2.1 Organization



2.2 Sustainability

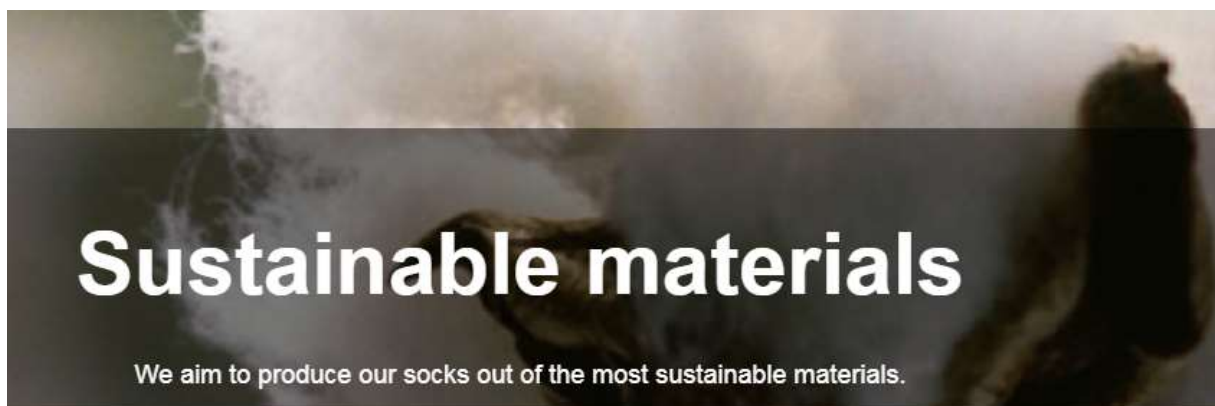


2.2.1 Social Production

We are committed to produce our socks under fair labour conditions. We strive to implement our Code of Labour Practices and Star Sock Spirit in the factories we work with. We use the Fair Wear Foundation Code of Labour Practices, based on ILO conventions and the UN's Declaration on Human Rights.

Our production locations are based in China, Turkey and Portugal. In 2009 we opened our own Chinese office in the Zhuji area. This office enables us to further implement our social and quality standards in our production locations, by engaging our Chinese staff/ QC's and making them part of our sustainable journey. The Chinese office helps us to establish long-term partnership with our suppliers. Long-term relations form a solid basis for the implementation of fair standards in the factories.

2.2.2 Sustainable Materials



We aim to produce our socks out of the most sustainable materials. At Star Sock we like to work with sustainable materials as much as we can. We even strive to produce 80% of our socks exclusively out of sustainable materials by 2022.

- **Regenerated polyamide**

ECONYL® is used, a high-quality Polyamide yarn made from nylon waste, in the manufacturing of our socks. ECONYL® is developed through an innovative industrial regeneration process; turning nylon waste, such as recovered fishing nets and plastics, into new yarn.

- **Recycled cotton**

In the garment production a lot of cutting waste can be found. This 'waste' is often good quality cotton that is thrown away. In our production process these flakes are used as the base material for regenerated cotton yarn. This is a perfect yarn for our sports and workwear socks. Our sport socks from Portugal are made out of recycled cotton yarn, displacing the need for virgin cotton and significantly reducing the environmental impact of production.

- **Better Cotton Initiative**

In 2017 Star Sock signed a membership with the Better Cotton Initiative (BCI). BCI exists to make global cotton production better for the people who produce it, better for the environment it grows in and better for the sector's future, by developing Better Cotton as a sustainable mainstream commodity.

- **Organic cotton (GOTS)**

Although cotton is a natural and very comfortable product, it is not necessarily an environmentally friendly fibre. It is a thirsty crop, requiring a lot of water and a lot of pesticides. We are therefore gradually increasing our use of certified organic cotton. To achieve this we work with organizations like Organic Content Standard (OCS) and the Global Organic Textile Standard (GOTS). They help us verify, among other things, if our socks actually contain the amount of organically grown material we believe they do. Why? Because we want to make sure our communications about these percentages are honest and correct. These organizations also see to it that our cotton is produced without using chemical fertilizers or pesticides. The result is a high quality cotton that is better for the farmer and the environment. In 2018 Star Sock got their certificate for GOTS. So we can offer clients a supply chain totally certified GOTS. The organization GOTS is also checking the supply chain on social aspect, so this is really an advantage of GOTS that social compliance is covered.

2.2.3 Reducing Environmental Impact



We aim to use less energy, less water, less chemicals and less packaging in our production process. Furthermore we strive for efficient logistics and work in an energy efficient office in The Netherlands. We currently focus on three main improvement areas: sustainable head office, environmental packaging and reduction of chemical substances.

2.2.4 Increasing Positive Impact

We aim to involve our stakeholders in our journey. In order to learn, inspire (in our role as ambassador for the Healthy Seas Initiative) and share our knowledge we visit and participate in various public meetings. We are part of working groups and our founder Eric Roosen participates in various discussion panels and is often invited to be a speaker during public or business events.

In 2018 we have given presentations to our clients. We have asked to come to Star Sock, so out of their own office and in an inspiring area. We have invited of the client: the buyer, CSR manager and a member of the management team. In this presentation we have given the client all information about social compliance and environmental compliance. What we as Star Sock are doing and what is possible in textile world. This to inspire not only the buyer but the total company.



2.3 Star Sock Spirit



At Star Sock we are passionate about socks, about the people who wear them, and the people who make them. We believe that success is not measured solely in money, but also in the positive impact we have on those around us and our planet. We want to be successful as a company, and our core values **pleasure, professional, passionate and pure** are at the heart of everything that we do. Together we go the extra mile.

Therefore it is our mission to take work of our clients hands by providing **surprisingly sustainable socks**. We offer tailor-made solutions, bestsellers, competitive advantage and we help our clients to build a business case for **sustainable, good quality products** through their sock shelf.

To achieve this we intend to work with like-minded partners that share our focus, and establish **long-term partnerships**. We are committed to deliver quality products made under **fair conditions** for workers and the environment, a focus that should lead to **stepwise** and **continuous** improvements in our supply chain.

To guarantee that our products are made under fair conditions, as of January 2015 Star Sock is affiliated to **Fair Wear Foundation (FWF)**. As an independent non-profit organisation, FWF helps us to further improve labour conditions and advance the welfare of the workers in our production facilities. We use the FWF Code of Labour Practices as our **Social Code of Conduct**.

Where we strive to minimize our environmental impact, compliance with **local environmental law** is mandatory. From this baseline we are committed to collaborate with our partners to further minimize our **ecological footprint** through e.g. energy reduction, increased use of sustainable raw materials, minimal use of harmful chemicals, and reducing emissions. Not only will this benefit the environment, but also result in a leaner, greener, and more equitable supply chain.

Through this continuous improvement of social and environmental conditions, in which we build and expand each other's **knowledge and skills**, we aim to make our suppliers the **leaders** of their industry. An open and respectful collaboration that leads to better quality and a healthy and profitable way of doing business, for everyone involved.

This will be a continuous journey, as every challenge starts with one first step. In this journey we expect our existing and new partners to share our core values, which form the basis for our course over the coming years.

2.4 Product range

Star Sock deals with socks and socks only. This is a very clear and simple choice. We take control of the full operational process, providing a ‘worry-free product’. We translate our clients’ needs and wishes into a desirable tailor-made sock assortment consisting of basic and attractive private label socks in various product categories such as:

- **Private label socks**

Generally speaking we do not keep stock but produce tailor-made private label socks on demand and take work of our clients hand. We do not only develop quality products for a fair price – we go the extra mile by implementing sustainability criteria in our production process. We currently provide private label socks for large European retail chains and department stores such as Kaufland, Zeeman, As Watson and Albert Heijn.

- **Healthy Seas socks**

As co-founder of the Healthy Seas Initiative we help our clients to market a unique, sustainable and profitable business proposition: Healthy Seas socks. These comfortable socks are made with ECONYL®, a yarn created by upcycling old fishing nets. At Star Sock we have the exclusive license to produce and sell socks at www.healthyseassocks.nl or www.healthyseassocks.com with this exciting and innovative yarn.

- **Branded socks**

Such a Lotto and New Balance in the past and Gaastra, NZA and Le Coq Sportif in the present. Each brand is distinct and has its own characteristics. As licensee for various strong brands we understand this. We design, develop, produce and sell. This means we create individual brand concepts, translating them into high-quality technical and casual products which we sell to mass-merchant retailers in Europe. Star Sock successfully markets the sock proposition for recognized sports and outdoor brands.

2.5 Production

Star Sock believes that long term, tight and personal cooperation with our supplying partners is very positive for both parties. Some of our suppliers like Yijia in China and Gelal in Turkey have been with us since the company started, others have been with us for years already. We visit each supplier on regular basis, normally twice a year in Portugal and Turkey and three times a year in China. These visits are not only done by the purchase department but also by the owner of Star Sock, who feels the need to spread his message from a personal ground. In the first three months of a new year, there is a management meeting where results, accomplishments and improvement in that previous year of both companies is discussed. The leverage of Star Sock in terms of orders is mostly below 10% but the commitment and two way stream communication makes supplying partners loyal and dedicated to Star Sock.

2.6 Production Partners

FWF number	Country	Factory name	Start partner-ship	Production volume 2017	Production volume 2018	Leverage 2017	Leverage 2018
6427	CHINA	Yijia	2004	28%	51%	10%	25%
7741	CHINA	Sanfei	2013	20%	11%	10%	5%
11448	CHINA	Boahe	2015	14%	6%	14%	6%
7743	CHINA	Goldenkey	2011	11%	12%	12%	5%
13260	TURKEY	SABY Corap	2018		8%		15%
11450	TURKEY	Bogazici	2011	3%	2%	2%	1%
13633	TURKEY	VARDAR TEKSTIL	2018		1%		1%
7747	TURKEY	Gelal	2004	2%	2%	0%	0%
7745	PORTUGAL	MC Socks	2004	4%	5%	1%	5%
7744	PORTUGAL	PCM	2004	5%	0%	1%	0%
7746	PORTUGAL	Estrada & Costa	2012	6%	2%	5%	1%

2.7 Supplier relations

China is still our main production country and responsible for 75% of our production volume. The Rep Office of Star Sock is located in the Zhuji area, where all of our suppliers in China are located. In Zhuji Star Sock has a team consisting of:

- **General Manager** → working at Star Sock for nearly ten years. Responsible for relationship management with our suppliers, overlooking and monitoring social and environmental compliance issues, dealing with quality issues and being in the daily lead of the office.
- **Merchandising** → Our merchandiser is working at Star Sock for nearly ten years. Merchandisers are responsible for the entire order follow up until goods are being shipped.
- **Quality control** → Qc's are responsible for the collection of samples, inline inspections, final inspections and we are training them to observe factories with a social compliance mind set and report Star Sock about the findings. Next step is to use our QC's as our extension tool for addressing subcontracting and make the first risk analysis in order for Star Sock Netherlands to take necessary measures.

China

In China we work with four small/ medium sized manufacturers (approximately between 50 and 125 workers) because this matches our order portfolio and makes it a partnership based on equality. We choose partners where the whole process knitting, boarding, toe seaming and packing activities take place. Being a small company we choose to work with manufacturers who can offer the whole process, this way we can make efficient use of our resources. These manufacturers are visited by Star Sock Netherlands at least three times a year and on a weekly basis by our Chinese colleagues. The stable relationships are based on an open, transparent and trustworthy two-way-stream communication necessary for continuous improvement. This year the Star Sock Zhuji team event took place together with staff members of Sanfei and Yijia (on their own initiative). This is to underline the mutual cooperation. Star Sock cannot guarantee a fluent and stable order flow (more on this topic is explained in the production cycle chapter) but throughout the years the order distribution between the four manufacturers has been the same. Unfortunately the order value has dropped significantly due to the loss of sales Star Sock was confronted with in 2018.

Portugal

In Portugal we work directly with the manufacturers, who we have a long-term relationship with. Unfortunately Portugal was hit the hardest by the sales decrease of Star Sock in 2017. Since Portugal has a very slim product category and hardly any competitive advantage compared to Turkey or China, they are the most vulnerable when the market struggles. Especially Estrada & Costa, being the smallest factory is faced with difficulties. In the beginning of 2016 Star Sock was already transparent to its factories about the forecasts and throughout we have been in close communication to them and we still are. In 2018 we tried to get some more orders to support the factories but it will be difficult.

Turkey

As of 2017 Star Sock decided to work with a Turkish intermediary in Turkey. Local presence is very important, we learned from the inconvenient relationship with some Turkish suppliers. Face to face communication with Turkish suppliers is always "good" but when back in the

office the chasing for answers and information starts and delays are more common than exception. Therefore, we choose to have local presence in the factory to help with communication and order follow up. This intermediary (Tuba) is paid by Star Sock for her interference from the moment the order is placed until the moment the order is shipped. in 2018 we have worked a lot with Tuba to inform her about the social situation in turkey and she attended the Audit which we have done. In this way she has got a lot of extra knowledge to help the factories improve themselves.

2.8 Monitoring activities

Factory Data			Monitoring Activities							
Production country	FWF factory number	Factory	FWF COLP signed	Star Sock self assessment questionnaire	FWF Audit	Wep Training 2018	BSCI Audit	Auditor	Status CAP	Visits 2018
China	11448	Boahe	Yes	Yes	8-2017	X	x	BSCI/ TUV	C status	03-2018 07-2018
China	7743	Golden key	Yes	Yes	X	X	10-2019	BSC/ BSI	Follow up C status	
China	7741	Sanfei	Yes	Yes	4-2016	x	11-2019	BSCI/ Intertek	Follow up C status	
China	6427	Yijia	Yes	Yes	7-2017	X	9-2019	BSCI/ TUV	Follow up C status	
Turkey	11450	Bogazici	No	No	X	X	1-2020	BSCI/ Intertek	Follow up B status	8-2018 11-2018
Turkey	7747	Gelal	Yes	Yes	X	X	5-2020	BSCI/ Intertek	No action B status	
Turkey	13260	SABY	Yes	Yes	12-2018	x	7-2019	BSCI/ Intertek	No action B status	
Turkey	13633	VARDAR	Yes	Yes	X	X	6-2019	BSCI/ SGS	No action b Status	
Portu- gal	7745	MC Socks	Yes	Yes	X	X	5-2020	BSCI/ Intertek	No action A Status	10-2018
Portu- gal	7744	PCM	Yes	Yes	X	X	2-2021	BSCI/ ITS	No action A Status	
Portu- gal	7746	Estrada Costa	Yes	Yes	X	X	4-2020	BSCI/ SGS	No action A Status	

The work to follow up on audits and verify that suppliers act per agreed Corrective Action Plans is an on-going work-in progress. During the year, several meetings took place between factory managers and Star Sock team members. These meetings are documented and form the basis of next conversations, this works the most efficient in our opinion and give good insights in the progression made and bottle necks that re-occur.

In total we have audited suppliers who carry 78% of our production volume in total, and 85% including the low-risk countries. 2018 has been the 4th member year of Star Sock and we had the ambition to monitor at least 90% of our supply chain which we almost made.

2.8.1 China

We conducted one Fair Wear monitoring audit in 2017 at Boahe in China and at Yijia in China a verification was conducted. FWF auditors were able to earn management's trust and official documents are shown during audits. With many workers getting paid a piece rate, systematic record keeping is vital to ensure that workers receive the compensation they are due. There is a need for action in China for all suppliers in respect of management practice, working hours, compensation, occupational health and safety, and environment protection in particular. Another reoccurring issue is the high turnover rate after Chinese New Year (CNY). In China it is common that after CNY the workforce is renewed. During CNY workers go back to their home regions and families and determine future steps for the year to come. This often leads to the re-installment of a majority of the workforce after CNY by numerous of reasons but mostly because they choose work in another region, they choose another employer because of other family members or they can earn more money somewhere else. The market demand for workers is high and therefore this situation puts pressure on the factory management to keep workers satisfied and happy so they return after CNY. The re-installment of new workers puts pressure on factory management, it is a waste of resources and slows down the production start-up after CNY.

We have also enrolled one of our Chinese suppliers in the Workplace Education Program offered by Fair Wear; where the response is very positive but since the worker turnover rate after CNY is very high (in most cases 75% of the work force is not coming back after CNY and need to be replaced), and therefore knowledge is not warranted for the long term. The WEP tool raises awareness and improves communication between workers and management. The challenge to educate workers and involve them, centralizing them as the important motor block of the factory and create involvement among the workers is a big challenge and made difficult due to cultural heritage.

- **Working hours:** There is still excessive overtime. Workers work up to 84 hours a week and work consecutively up to 20 days without a day off. Usually workers have a rest day after 6 days but workers voluntarily want to make more hours in order to earn as much money as they can. This is how the industry is set up. Working hours, mentality, culture, living wages are all very closely intermingled. Often overtime is not a result of bad planning or last minute changes in deadlines; it is to keep the workers satisfied and happy. They want to work as much as possible, because it is only work what drives them to a region far away from their families. The conclusion can be drawn that this is a unhealthy market force; Star Sock has little control over. We keep addressing this point and convincing factory management of the risks they take; accidents, dropouts, consistency, quality issues etcetera. Workers are the most valuable players in this industry and both parties see overtime as a win/ win situation.
- **Safety and Health:** All minor issues have been solved but we are facing difficulties with social insurances. The law requires the insurance fee to be paid by both company and workers, the company needs to pay 70% and workers need to pay 30%. But workers are not willing to pay the 30%, they prefer to have extra salary. This is not only a problem our factories are faced with but this is a general problem. The main reason for this conception is that insurances do not have national coverage. Insurances are only valid in the province you are working at. But since most workers are labour migrants, they need to go to their home province in case anything happens to them and when they do so, they are not insured. That is why workers prefer to receive extra money instead of insurances. Most office staff is insured because they do come from that same province.

- **Living wage:** At this moment our factories are paying a decent living wage, but only when the workers are making overtime. We have long discussions with our factories what we could do to change this situation but we are facing the following issues:
 1. Most of the workers who are working in socks are not coming from the production area, and they are migrating from all over the country. A lot of steps in the supply chain are handled by unskilled workers that is why it is interesting to work in this field. As they are only in the area for working they want to work as much as they can to earn money for their family back home. If the factories increase the money to the fair living wage level, the workers still want to work more hours and earn even more money. If the factory offers the workers the same amount without overtime the workers will leave to another factory, located next door where they can work more hours and hope that in the end they will collect more money. We also heard workers say, what should we do with the extra spare time in the evening and weekend? They don't want to spend more money in their working city and save everything for their home town.
 2. In Zhuji there are many socks factories on 15 minute drive distance. So the workers can swap easily the factory where they want to work and do that often. All our factories face huge movement of personnel. This is also a form of collective bargaining, basically if the factory doesn't live up to the area standards, no workers will stay there. In 2017 Star Sock started the discussion how to avoid these issues, which occur especially around Chinese Newyear. Hopefully these results will be visible in the brand performance check 2018.
 3. Together with factories we have calculated what investment is needed for workers to receive a living wage without calculating overtime premiums. Bottom line is a price increase of minimum 8% for an ordinary plain sock (which needs to be paid by all clients of this factory). Due to point 2 and 3 this would not solve overtime and thus no guaranty that a factory holds on to their workers. It would harm the competitiveness of the factory and also brands/ retails/ importers sourcing from this factory.

- **Subcontracting:** In the different audit reports from Fair Wear Foundation it was found that our suppliers use subcontractors; in almost all cases the use of subcontracting is approved by Star Sock but we found out there is a proliferation on different subcontractors. Subcontracting is approved by Star Sock when the articles placed have uncommon sizing (baby 62/68 or large men size 47/50), have rare needle counts (168/200 needles), have rare toe linking or are just uncommon products like tights, leggings and footies. Most medium sized factories cannot handle uncommon issues because they do not have the machines to run production or they just do not want to change their machines. The reasons why subcontracting is so entangled to this industry is because medium sized factory's hardly reject any order, they have little influence on the order flow for the years to come and therefore they take what they can get. This means when a factory has approximately 100 machines which is about 300 pairs a day, 10.000.000 pairs a year is needed to keep production running full time and cover the costs. If a factory accepts more orders than the 10.000.000 pairs a year needed, subcontracting is needed to meet market demand. Again, factories take what they can get.

3 Knitting and toe seaming subcontractors

- Subcontractors are always checked for a business license.
- Always with a written agreement.
- Payment is 10 days after original factory receives payment from their client. Star Sock is not happy with this and conversations on this topic are on-going. Star Sock believes that the payment must be done sooner, maximum of 10 days after delivery.
- Quality is key and needs to be guaranteed. A well-developed and organised subcontractor gives security and is more sustainable on the long run.
- Workers often get paid the same or even more than the workers in the "original" factory. Secondary employment conditions might be less (dormitory, meals etc.) and this is compensated in their wages. For this type of labour, worker position is strong because there is more demand than supply.
- Inline quality inspections are done by the original factory.

4 Boarding subcontractor

- Subcontractors are always checked for a business license.
- Always with a written agreement.
- No skilled workers needed and thus higher risk for social issues.
- Payment is 10 days after original factory receives payment from their client. Star Sock is not happy with this and conversations on this topic are on-going. Star Sock believes that the payment must be done sooner, maximum of 10 days after delivery.

5 Packing subcontractor

- Not checked for a business license.
- Not always with a written agreement.
- Problems on social and environmental issues are more likely to occur when dealing with this type of subcontractor. This is a high risk for Star Sock because you only need a free space and workers for this job. Workers are recruited for one job only and not continuously. Often local (disapproved/difficult) non skilled workers or retired people, who are looking for extra money.

Star Sock knows subcontracting is part of the industry but would like to work with pre-selected preferred subcontractors and arrange subcontracting for packaging in a more transparent and organized way. In 2018 we have been visiting many subcontractors and tried to get a better understanding of this complicated, underlying industry. All visited subcontractors have been sent the FWF CoLP, the Fair Wear Worker Information Sheet to be displayed in a visible place and a questionnaire along with a basic self assessment that is conducted. By the end of 2018 we want to have pre-selected subcontractors for knitting, boarding and toe seaming and keep track-records of the different stages of the production of our orders. A new PLM system Star Sock purchased, will enable Star Sock to actively monitor orders and know every phase an order goes through. The implementation of this system takes place in May, six months later than expected but we can definitely share results of this improvement in 2018.

2.8.2 Turkey

Luckily we found some more reliable businesspartners in 2018, resulting in improving the business and our turnover. To have local staff on the ground is important so we can follow our products. Twice a year we visit the factories to discuss the social issues. And by the end of 2018 we have had our first Fair Wear Audit .

We put a lot of effort in building our knowledge and know-how concerning the political instability in Turkey and the refugees situation in Turkey. Publications, reports and findings concerning these topics are studied. In February we facilitated an in-company training, where a co-worker of the Dutch Embassy in Istanbul came to Star Sock for one week. She was in contact with our suppliers on topics concerning political stability and the Syrian refugee problems. La

Child labour was almost banned from Turkey but with the current refugees development, we are taken back in time. By visiting Turkey on a weekly basis, during production, we keep a close look on what is actually happening. So far, no factory of Star Sock has enrolled Syrian workers. The problem is not the Syrian workers but the terms and conditions they have to work in.

2.8.3 Portugal

The main monitoring activity is to update Star Sock Form Factory questionnaire, the FWF self assessment questionnaire, a photo of the code of labour practices and the review of Amfori BSCI (or other) audit results. Unauthorized subcontracting is the main concern in Portugal and we tackle this by:

- Semi un-announced visits (we announce them a few days in advance). Travelling to Portugal is very easy and we often organize these trips in a short period of time. Our factories are used to this. During every visit we check running production.
- Due to the lack of orders we visited Portugal only once.

As we highly value the collaboration with our Portuguese suppliers, we keep searching for ways to work together.

3. Sourcing Strategy

Star Sock follows a traditional approach regarding our sourcing strategy and management of suppliers. Long-term partnerships with our suppliers enjoy the highest priority as this helps us achieve and maintain a consistent quality level and is allows us to implement social responsibility standards, even when our leverage it very little. For us, continuity is more important than short-term financial success.

Creating best sellers, adding value to products is what determines the success of our business. Therefore Star Sock has three different approaches for product development:

1. **Collection:** two times a year, a summer and winter collection is designed with accessible products. Through a sample request, products are requested in the designated factories, determined by purchase. Star Sock defines the quality, technical properties and target price but expects factories to come with counter proposals. Star Sock do not have the quantities and order guaranties to enforce competitive prices and therefore competitive advantage need to come from developing cleaver and innovative products. This process is in close cooperation with our suppliers. Giving the supplier an important voice in the development phase has many advantages for both parties: cross-pollinations of knowledge, anticipating on production issues in an early stage and creating successful articles together. The development of the collection takes about three months from start to finish.
2. **Product meetings:** Once every two months the whole Star Sock team meets for product sessions, to discuss qualities, market developments and trends. It is important for the whole organisation to be involved in these important brainstorm meetings. During these meetings a few “seasonals” products developed in between the two main collections are selected. Process is the same as in previous step. These two steps form the important basis for our product assortment.
3. **Tailor made products:** Sales and merchandising have regular KAM meetings where appointments with key accounts are discussed. In these meetings tailor made products for key accounts are developed. The development stage is similar to previous steps, only timelines are shorter. These products need to be developed in three weeks’ time.

This process requires a lot of sampling which is often the problem for suppliers and valuable information throughout this process is not always kept in the right way. A bottleneck which affected the suppliers negatively and therefore in May 2018 a new PLM system was introduced. This product database guarantees more structure and prevents requests for unnecessary samples and information. This will make the development process considerably more efficient.

If the development of new suppliers or production country becomes necessary, Star Sock has policies in place.

1. The buyer examines countries very thoroughly, by finding persons/ organisations that already have established an business and by reading country studies/ Amfori database.
2. We plan a visit, where the buyer (often accompanied by the owner of Star Sock) will investigate the country and supplier based on a long list of potential suppliers. Just before the sourcing trip, all factories are requested basic information (general list 1 and 2) and quotations for preparation. The preparation request indicates the type of consumer we are and the output often indicates the suppliers we are dealing with. Suppliers are rated by a checklist, where social compliance aspects are an integral part of the selection and decision making process. Important factors are location, capacity, manufacturing abilities as well as quality and pricing of the products. Most important indicator is the extended factory tour. We generally check workplace safety, work force atmosphere and working conditions and we go through the Healthy and Safety check.
3. These founding's will be presented to the management and a short list of potential suppliers is listed.
4. The short list of potential suppliers is requested for more in-depth information on working conditions (Form Factory list, self-assessment questionnaire) as also actual audit reports and a copy of the FWF CoLP and worker information sheet. At this point a sample request is placed to check qualities.
5. The next step is placing a trial order, where both parties can experience a real case with no commercial value.
6. The trial order is evaluated with all involved departments, to determine whether we will continue working with this supplier.
7. A positive outcome will result in a Fair Wear monitoring audit. From the beginning Star Sock would like to align new suppliers to the Fair Wear programme and intensifying the relationship with clear expectations and demands.

With Saby and Vader in Turkey, we both have done trial orders and both went smoothly. After discussing internally with the Star Sock management team we decided to work with Saby first due to the fact that he can deliver a better quality of socks then Vardar. We keep Vardar still in the loop and will share the learnings we have with Saby also with them so they can improve themselves. They were already supplying to a Fair Wear member and therefore they know this organisation.

3.1 Terminating partnership

Star Sock tries to avoid terminating partnerships as it is bad for both parties. We try to keep them “sleeping” in a way that we still keep the contact and discussions going on but when we have the possibility of an order we will try to make them awake. During this process we still can influence the factory, although it is minor due to the lack of orders. In 2018 our orders decreased a lot with some factories but we won't terminate the partnership. We are transparent on the chances which we can give to some suppliers, luckily our lack of orders is absorbed by our competitors and all the factories are still existing and working.

3.2 Strategy and pricing

Our orders are placed on full price terms. Price negotiations are undertaken both at an early development stage and later on again with order figures in hand. The time between these phases is often between 3 to 6 months; in that period a lot can change both from the suppliers perspective (raw materials pricing, timing and capacity etc.) as also from Star Sock's perspective (volumes, exchange rates etc.). Star Sock is operating in the lower retail segment and honestly price is essential and leading. Negotiations start with the supplier that is responsible for the product development. When negotiations fail or targets are not reached, we investigate how we can change the product to reach the target, in the last attempt we reach out to other suppliers. When pricings deviate strongly, we need to examine the reason and we openly discuss pricings with suppliers. With basic items (repeats), where prices are stable, we divide orders equally between suppliers. As mentioned, price is very important but we will not compromise on quality nor on sustainability and looking for the cheapest solution out there is not in our DNA. The reason why we never actively sourced in Cambodia, Myanmar and Bangladesh.

Open cost calculation and price transparency is communicated with suppliers but still in a very cautious way. At this point we can say, we have a good insight in the cost price of a sock, which enables us to value a price (developed a cost price calculation tool). The impact of social changes such a living wage/ production shifts on the cost price are being discussed on management level. Understanding the pain of the supplier is key, if you want to make changes. Nevertheless margins and finding out exactly what suppliers are putting on top, of a product is a grey area, where we feel we need to give suppliers some wiggle room. Western companies tend to control their supply base in every aspect of the business, but we think it is more constructive when both parties take control of their own businesses and communicate transparent about it.

3.3 Buying department

Supply Chain Manager & Purchase

- Coordination of the merchandising department
- Coordination of the China Office
- Supporting the implementation of CR actions and introducing them in China
- Maintaining relationship to suppliers and sourcing new suppliers
- Identifying targets for CR action
- Contributing to new impulses from market analysis

Project Manager

- Development and implementation of CR activities
- Monitoring FWF membership
- Coordination of CR communication (internal and external)
- Reporting to management on CR status

Merchandiser

- Communication (on order basis) with our Chinese colleagues and factories
- Observing “critical” issues and activities

All strategic goals and activities are determined by the Management of Star Sock existing of the director/owner, the financial manager/ owner and supply chain manager. Approximately every other week there is a meeting planned where, among other things, social compliance and the supply chain is discussed and plans are forged to reach our goals. Star Sock has the ambition to invest 1% of the FOB turnover in social compliance projects.

3.4 Production cycle

At the moment we work mostly according the Make and Ship principle. This means that we place the order once we receive it from our client and ship on the requested date. Before confirming this date we calculate the critical path and ask for an confirmation from the factory. This calculation is done per order and includes the time of production to avoid causing overtime in the production facility. The production orders are based on the client orders, we have very little influence on that process. All lead times are dependent on clients demand, internal planning, capacity of our suppliers and material lead times. The critical path we draw up together with our suppliers.

In 2017 we started with a new pilot; in order to get more grip on expected business and orders. For an important client of Star Sock, we created a sustainable basic sock with BCI cotton within the Jack Brent private label of Star Sock. The socks are pre-priced for this specific client and Star Sock will keep stock of these items. Because of that fact, the client is obligated to take on al socks but we have not decided on a time frame; which is quite unique in our business. When the client has an open-to-buy budget, these stock items will be delivered immediately. Advantage for the client is fast delivery without putting pressure on suppliers and Star Sock has an ongoing product flow. In this way Star Sock is able to deliver sustainable socks, factories have a better production flow and the client is offered flexibility. Open to buy is released when sales volumes are better than anticipated on.

4. Complaint handling

An important element of our membership to Fair Wear Foundation is the use of the “complaints mechanism”. The grievance procedure in place allows workers to confidentially and anonymously report any complaints or incidents to an independent and local FWF representative, that they have not been able to solve with their management. FWF provides the contact details and a summary of the labour rights in the respective languages and displays the information prominently in the production site. During every visit (also by our QC’s) we will check if the Worker Information Sheet is still clearly visible and accessible to workers. The procedure is explained to management and workers at the production site during trainings, audits.

Star Sock would see complaints through this mechanism as an indication of the progressiveness of the production partner and a healthy atmosphere where workers want to speak up and contribute to change; unfortunately Star Sock never received complaints through this procedure.

Most factories have their own grievance mechanism but in most cases you see management and workers meet on a regular basis to discuss improvements on working conditions and complaints. The frequency differs per factory from once every 6 months until monthly meetings. In China this is definitely progress in comparison to a few years ago. Three suppliers have an elected worker committee in place. Star Sock is trying to get a good understanding on how this works, how this is continued also after CNY when the workforce is often re-newed, how these members are compensated for the effort they put into it and how independent and free they can operate.

In all countries where we produce Portugal, Turkey and China we see good workers are getting more and more difficult to find and to recruit. In China but also Turkey we see an additional problem and that is workers lacking loyalty to their employers. The grievance mechanism but even more worker committees are seen as a tool to take the voice of the workers serious and involve workers more in the daily operation. In China this process is still in the beginning phase, where Portugal and also Turkey already use this tool to their advantage.

5. Training and capacity building

Keeping our employees up to date about our sustainability efforts matters a lot to us. Our people are the most important ambassadors of our company and the journey to become a leader in our industry. During the quarterly operational meeting with the whole team, the steps made in this journey (both environmental as social) are discussed. For team members who are not familiar with the processes, particular terms and abbreviations; we made a quick scan for their reference. The journey is a team effort and for that reasons we need everybody on board. The buying team (see 1.3) is educated on a more substantial level. Workshops from BSCI, seminars from Amfori, FWF meetings, Covenant meetings are attended by various Star Sock members. As these seminars and meetings are increasing; the choice what to attend and what not to attend is becoming complex. Star Sock would like to see some cooperation between the various organisations. The Dutch employees as also the Chinese employees receive detailed information from the Manager Customer Care about the FWF membership, auditing processes and social activities. At least a few times a year, we like to organise a fun activity, where employees get acquainted with difficult compliance issues during breakfast

sessions, or an internal workshops. With our Chinese colleagues we have tried the same approach but it more difficult; they need more time and education because they are raised in a different way. Their mind set is not the same. They still feel it as an obligation which is pressured by retailers and brands rather than a choice of the organisation itself.

We regularly invite the management of our factories to trainings and seminars on a range of issues, the response is still very limited but this is slowly changing. More and more questions arise when these invites are sent. Participation is more valuable when management is taking these invites voluntarily. We never force or put pressure on participation.

6. Transparency and communication

More and more retailers are establishing a procurement structure, with a little reliance on importers as possible. Most important reason is price and transparency/ control in the countries/ companies they source from. Star Sock, being an importer, is put heavily to the test and needs to proof added value in the supply chain on a daily basis. Being transparent about production locations and Corrective Action Plans is a boundary condition to do business. We work business to business and in our company presentation we always pay attention to our membership of Fair Wear and how we live by this membership. On our website we have a special focus on social responsibility, the Fair Wear membership is an important issue. In our social reports, we try to be as transparent as possible; about the achievements but also the failures or subjects that are under developed.

Just recently we were in contact with the company Neue Masche concerning labour minute costing. Contact came from a webinar about the living wage organized by FWF. Star Sock already has experience with labour minute costing in the sock production and we were happy to inform Neue Masche, another sock intermediary about this.

7. Stakeholder engagement

Star Sock is co-founder of Healthy Seas and one of the commitments of all three co-founders is education. Sharing the story, explaining sustainability from a business perspective and encourage others to join this journey. Even though the focus in 2018 was on sales, expanding business and recover from the sales loss, we feel this is the time where we should focus on helping each other to reach sustainability goals and ambitions.

Engaging stakeholders is done on several ways:

1. Accompanying multiple student projects on different levels (elementary school, MBO, HBO and universities).
2. Guest speaker at different school and universities such as Tilburg University - International business.
3. Organising elementary school activities to learn more about sustainable materials.
4. Contributing to international case studies on innovative but sustainable resources.
5. Guest speaker at companies with sustainable ambitions and questions such as where to start.
6. Providing company tours due to the “different” working environment of Star Sock and the sustainable choices that are made.
7. Communicating frequently through the Healthy Seas social media channels.

8. Keeping our Star Sock website up to date with goals and achievements; could be done in a more structured way.
9. Speaking at the Fair Wear Foundation National conference
10. Giving presentations to buyers and CSR departments of retailers about sustainability and materials.