



BRAND PERFORMANCE CHECK

Anna van Toor

PUBLICATION DATE: MAY 2015

this report covers the evaluation period 01-01-2014 to 31-12-2014

ABOUT THE BRAND PERFORMANCE CHECK

Fair Wear Foundation believes that improving conditions for apparel factory workers requires change at many levels. Traditional efforts to improve conditions focus primarily on the factory. FWF, however, believes that the management decisions of clothing brands have an enormous influence for good or ill on factory conditions.

FWF's Brand Performance Check is a tool to evaluate and report on the activities of FWF's affiliate members. The Checks examine how affiliate management systems support FWF's Code of Labour Practices. They evaluate the parts of affiliate 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 factories, and most factories work for many different brands. This means that in most cases FWF affiliates have influence, but not direct control, over working conditions. As a result, the Brand Performance Checks focus primarily on verifying the efforts of affiliates. Outcomes at the factory level are assessed via audits and complaint reports, however the complexity of the supply chains means that even the best efforts of FWF affiliates cannot guarantee results.

Even if outcomes at the factory level cannot be guaranteed, the importance of good management practices by affiliates cannot be understated. Even one concerned customer at a factory 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 factory 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 FWF'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 affiliate employees who play important roles in the management of supply chains, and a variety of documentation sources, financial records, supplier data. The findings from the Brand Performance Check are summarized and published at www.fairwear.org. The online [Brand Performance Check Guide](#) provides more information about the indicators.

BRAND PERFORMANCE CHECK OVERVIEW

Anna van Toor

Evaluation Period: 01-01-2014 to 31-12-2014

AFFILIATE INFORMATION	
Headquarters:	Meerkerk, Netherlands
Member since:	01-02-2013
Product types:	Fashion
Production in countries where FWF is active:	China, India, Turkey
Production in other countries:	Italy, Lithuania, Madagascar, Pakistan, Poland, Portugal
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
All suppliers have been notified of FWF membership?	Yes
SCORING OVERVIEW	
% of own production under monitoring	78%
Benchmarking score	44
Category	Good

Summary:

Anna van Toor is in process of implementing FWF's management system requirements. 2014 was the second year of membership for Anna van Toor during which the company focused on setting up systems to inform and monitor suppliers. 44% of Anna van Toor's purchasing volume comes from suppliers located in low risk countries. With two FWF audits in China and followup of a corrective action plan (undertaken with another FWF affiliate), Anna van Toor has monitored 78% of their supply chain. This exceeds the 60% monitoring threshold for a brand in the second year of membership.

Anna van Toor can take steps towards investigating labour costs and how this relates to its own pricing models. Anna van Toor has started working on a system to identify possible labour violations, which is still in progress and should be further integrated it into its sourcing and monitoring decisions. In 2014 year Anna van Toor has focused on gaining better insight into all the production locations, but because of the structure working with agents, assessing factory level situations remains challenging.

In addition, the company can help to ensure workers and managers at their suppliers are aware of their rights by taking part in FWF's Workplace Education Programme.

PERFORMANCE CATEGORY OVERVIEW

Leader: This category is for affiliates 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 FWF's belief that affiliates who are making a serious effort to implement the Code of Labour Practices—the vast majority of FWF affiliates—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 affiliates will receive a 'Good' rating.

Needs Improvement: Affiliates 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. Affiliates 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: Affiliates 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. Affiliates 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
1.1 Percentage of production volume from suppliers where affiliate buys at least 10% of production capacity	52%	Affiliates with less than 10% of a factories' production capacity generally have limited influence on factory managers to make changes.	Supplier information provided by affiliate.	3	4	0

Comment: Anna van Toor buys at least 10% of the factories' production capacity at its main suppliers representing 52% of the purchasing volume in 2014. The company is highly depended on seasons and consumer demands but aims to consolidate the supply chain where possible.

1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years	32%	Stable business relationships support most aspects of the Code of Labour Practices, and give factories a reason to invest in improving working conditions.	Supplier information provided by affiliate.	2	4	0
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Comment: Anna van Toor highly values long-term relationships with their suppliers. Due to growing, diversified product groups, the company occasionally selects new suppliers. In addition, changes in the supplier base are required to follow fashion trends and consumer demands and find suppliers for a specific specialisation or a specific garment treatment. 32% of the company's 2014 purchasing volume comes from suppliers they have worked with for at least 5 years.

1.3 All new suppliers are required to sign and return the Code of Labour Practices before first orders are placed.	Yes	The CoLP is the foundation of all work between factories and brands, and the first step in developing a commitment to improvements.	Signed CoLPs are on file.	2	2	0
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Comment: Anna van Toor selected three new suppliers in 2014. Signed questionnaires are filed per supplier.

1.4 Company conducts human rights due diligence at all new suppliers before placing orders.	Yes	Due diligence helps to identify, prevent and mitigate potential human rights problems at new suppliers.	Documentation may include pre-audits, existing audits, other types of risk assessments.	4	4	0
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Recommendation: It is advised to further integrate a documented procedure for assessing the labour standards when selecting new suppliers within the product managers staff. Outcomes of the assessment should be documented in order to systematically integrate labour standards in the decision-making process for selecting a new supplier.

Comment: Anna van Toor has developed a checklist for product managers who check if the Code of Labour Practices is posted in local language and assess the general health and safety conditions at suppliers. New suppliers are in some cases visited by Anna van Toor staff. In other cases, the agents are requested to collect information on labour standards. New suppliers receive the company handbook in which FWF membership is explained together with the Code of Labour Practices and questionnaire that suppliers are requested to sign.

1.5 Supplier 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
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Recommendation: FWF encourages Anna van Toor to develop an evaluation/grading system for suppliers where compliance with labour standards is a criterion for future order placement. Part of the system can be to create an incentive for rewarding suppliers for realised improvements in working conditions. The system can evaluate the entire supplier base with factory outcomes as input for social compliance criteria.

Comment: Price and quality are the most important criteria for Anna van Toor to evaluate suppliers. Outcome from factory audits and the willingness of suppliers to improve is taken into consideration when deciding to place orders with a supplier.

1.6 The affiliate's production planning systems support reasonable working hours.	General or ad-hoc system.	Affiliate production planning systems can have a significant impact on the levels of excessive overtime at factories.	Documentation of robust planning systems.	2	4	0
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Recommendation: A good production planning system needs to be based on the production capacity based on regular working hours. FWF advises Anna van Toor to investigate the production capacity of each supplier and see how the company's own production planning can facilitate the factory's planning. In order to gain more insight into the working hours of the factory, it is required to better track the time needed to complete Anna van Toor orders. With Anna van Toor's new styling system, it is recommended to investigate the impact this has on the planning and working hours of its suppliers.

Comment: Anna van Toor has a system for sharing and updating forecasts with suppliers to facilitate their planning. The company is flexible with delivery times by being able to prioritize certain orders and postpone others in case there is a delay. Given that the majority is produced for own Anna van Toor shops, the company can decide itself what to put in store and when. The company places orders every month throughout the whole year. For the majority of the orders, production managers order fabric themselves, which enables them to trace the delivery of fabric to the manufacturer. Suppliers decide when they deliver the first part of the order. Moreover, Anna van Toor aims to decrease the amount of late style changes by requesting for a salesman samples early in the production process. By doing so, the styling and product department immediately have a proper sample on which they base decisions for correct print, fabric and fit.

1.7 Degree to which affiliate mitigates root causes of excessive overtime.	Insufficient efforts	Some production delays are outside of the control of affiliates; however there are a number of steps that can be taken to address production delays without resorting to excessive overtime.	Documentation of root cause analysis and positive steps taken to manage production delays or improve factory processes.	0	6	0
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Recommendation: Anna van Toor could discuss with factory management the causes of excessive overtime and provide support to manage overtime. It is recommended to investigate whether their orders contributed to excessive working hours during Anna van Toor production. Anna van Toor is to prevent practices at brand level that are likely to lead to excessive overtime.

Comment: Given the company's structure working with agents, Anna van Toor is in most cases not in direct contact with the production locations with regards to planning. This limits the opportunity to assess the impact on working hours. Anna van Toor is in process of moving production planning to an earlier start, which takes possible delays or unexpected problems into account. Interventions are for example acceleration of the buying process, dye material earlier in the process etc. However, it is not yet clear how this can support reasonable working hours on a factory level. The FWF audit at a Chinese supplier that took place in 2014 showed working hour records were incomplete. From interviews with workers and management, the audit team concluded excessive overtime took place.

1.8 Affiliate's pricing policy allows for payment of at least the legal minimum wages in production countries.	Country-level policy	The first step towards ensuring the payment of minimum wages - and towards implementation of living wages - is to know the labour costs of garments.	Formal systems to calculate labour costs on per-product or country/city level.	2	4	0
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Recommendation: As an advanced step, increased transparency in costing and productivity gives insight in the labour costs per product. This forms the basis for ensuring enough is paid to cover at least minimum wage and for making steps towards living wages.

Comment: A target price is given by the supplier to Anna van Toor, some make use of open costing. The price is specified to production costs, without insight into the share that goes to workers. In the cases where Anna van Toor also buys the fabric, they can alter the price by making changes in the pattern or material. Anna van Toor has started collecting information in an excel sheet on the minimum wage levels for all production countries, by making use of FWF information. This forms the basis for relating the wage levels to their own pricing system.

1.9 Affiliate actively responds if suppliers fail to pay legal minimum wages.	No minimum wage problems reported	If a supplier fails to pay minimum wage, FWF affiliates are expected to hold management of the supplier accountable for respecting local labour law.	Complaint reports, CAPs, additional emails, FWF audit reports or other documents that show minimum wage issue is reported/resolved.	2	2	-2
1.10 Evidence of late payments to suppliers by affiliate.	No	Late payments to suppliers can have a negative impact on factories 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 factory and affiliate financial documents.	0	0	-1
1.11 Degree to which affiliate assesses root causes of wages lower than living wages with suppliers and takes steps towards the implementation of living wages.	No efforts shown.	Sustained progress towards living wages requires adjustments to affiliates' policies.	Documentation of policy assessments and/or concrete progress towards living wages.	0	8	0

Requirement: Anna van Toor is expected to take an active role in discussing living wages with its suppliers. The FWF wage ladder can be used as a tool to implement living wages. The wage ladder can also be used to document, monitor, negotiate and evaluate the improvements at its suppliers.

Comment: Anna van Toor has not yet started to discuss living wages with the suppliers. The company first had to focus on gaining more insight into the production locations.

1.12 Affiliate sources from an FWF factory member.	No	When possible, FWF encourages affiliates to source from FWF factory members. On account of the small number of factories this is a 'bonus' indicator. Extra points are possible, but the indicator will not negatively affect an affiliate's score.	Supplier information provided by affiliate.	N/A	1	0
1.13 Percentage of production volume from factories owned by the affiliate.	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 affiliate's score.	Supplier information provided by affiliate.	N/A	2	0

PURCHASING PRACTICES

Possible Points: 40

Earned Points: 18

2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	34%	
% of own production in low risk production countries where FWF's Low Risk policy has been implemented	44%	FWF low risk policy should be implemented. 0 = policy is not implemented correctly. N/A = no production in low risk countries.
Total of own production under monitoring	78%	Minimums: 1 year: 40%; 2 years 60%; 3 years+: 90% Measured as a percentage of turnover.

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 FWF 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: Anna van Toor's production managers are responsible for following up on problems identified by the monitoring system.

2.2 Degree of progress towards resolution of existing Corrective Action Plans	Insufficient	FWF considers efforts to resolve CAPs to be one of the most important things that affiliates can do towards improving working conditions.	Documentation of remediation and followup actions taken by affiliate.	-2	8	-2
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Requirement: Resolving and remediating non-compliances is one of the most important criteria FWF affiliates can do towards improving working conditions. FWF expects affiliates to examine and support remediation of any problem that they encounter. Coordinated efforts between different departments/production staff are required to ensure sustained responses to CAPs.

Recommendation: Anna van Toor could consider:

- Hire local consultant to assist factory in developing an action plan and to assist factory management in investigating root causes.
- Organise supplier seminars
- Provide factory training.
- Share knowledge/material with the factory
- Provide financial support to the supplier for implementing improvements.

Comment: Production managers who visit factories used the health and safety checklist and made pictures of their visit. They discuss the outcomes of these findings with the supplier. After the two FWF audits in China, Anna van Toor has been discussing the Corrective Action Plan mostly with the agents and not directly with the production location. The process of realising improvements has started but did not yet lead to demonstrated remediation.

2.3 Percentage of production volume from suppliers that have been visited by the affiliate in the past financial year	54%	Formal audits should be augmented by annual visits by affiliate staff or local representatives. They reinforce to factory managers that affiliates are serious about implementing the Code of Labour Practices.	Affiliates should document all factory visits with at least the date and name of the visitor.	3	4	0
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Comment: Production managers visit suppliers. Factory visits are used to obtain a basic knowledge of the level of working conditions. The factories that are not visited are in most cases visited by the agent, for instance in Pakistan.

2.4 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
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Recommendation: Existing audits can be counted towards the monitoring threshold if the quality of the report is assessed using the FWF audit quality tool and corrective actions are implemented.

2.5 Audit Report and Corrective Action Plan (CAP) findings are shared with factory. Improvement timelines are established in a timely manner	No	2 part indicator: FWF 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.	-1	2	-1
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Requirement: Anna van Toor is required to share and discuss the audit report and CAP findings with the factory within 2 months. A reasonable time frame should be specified for resolving findings.

2.6 High risk issues specific to the affiliate's supply chain are identified and addressed by the monitoring system.	Intermediate Capacity	Different countries and products have different risks associated with them; monitoring systems should be adapted to allow appropriate human rights due diligence for the specific risks in each affiliates' supply chain.	Documentation may take many forms; additional research, specific FWF project participation; extra monitoring activities, extra mitigation activities, etc.	3	6	0
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Recommendation: Knowing the country specific risks facilitates the starting point for discussing this with suppliers. Anna van Toor can agree on additional commitments that are required to mitigate the risks. The affiliate can provide additional measures for support and integrate that in the monitoring system. Particularly in countries where FWF is not active, such as Pakistan and Madagascar, it is needed to investigate the level of working conditions at those production sites. For India, violence against women should be an area to further investigate as well as freedom of association in Turkey and China. In addition, the fact that in most cases Anna van Toor is not in direct contact with the production locations and its subcontractors poses a higher risks in terms of unexpected problems.

Comment: Anna van Toor takes potential risk factors into consideration when planning audits and defining other monitoring efforts. Anna van Toor does not use sandblasting for its denim production, but develops alternative washings together with their suppliers in Portugal.

2.6a High risk issues specific to Bangladesh are identified and addressed by the monitoring system and remediation activities.	Not sourcing in Bangladesh	Affiliates sourcing in Bangladesh should take additional action to address both building and fire safety and the prevention of violence against women.	Building, electrical and fire safety inspection reports, evidence of cooperation with other customers sourcing at the same factories (Accord signatories and/or FWF affiliates), etc.	N/A	3	0
2.6b High risk issues specific to Myanmar are identified and addressed by the monitoring system and remediation activities.	Not sourcing in Myanmar	Myanmar is still in the process of establishing the legal and civil society infrastructure needed to ensure compliance with labour rights. Extra care must be taken when doing business in Myanmar.	Shared CAPs, Wage Ladders per factory.	N/A	3	0
2.7 Affiliate cooperates with other customers in resolving corrective actions at shared suppliers	Active cooperation	Cooperation between customers increases leverage and chances of successful outcomes. Cooperation also reduces the changes 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: Anna van Toor has been cooperating with another FWF affiliate at a shared factory in Turkey.

2.8 Monitoring requirements are fulfilled for production in low-risk countries	Yes	Low risk countries are determined by the presence and proper functioning of institutions which can guarantee compliance with basic standards.	Documentation of visits, notification of suppliers of FWF membership; posting of worker information sheets, completed questionnaires.	2	2	0
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Recommendation: Anna van Toor is recommended to use FWF's risk assessment in Italy in order to identify potential labour violation risks.

Comment: Anna van Toor visits their suppliers in low-risk countries and checks whether the CoLP is posted through the company checklist. Suppliers in Poland are regularly visited by production managers who did an assessment by means of the FWF health and safety guidelines. The suppliers in Italy are visited by the agent Anna van Toor works with. The agent sent pictures of the CoLP which was posted in the factory.

2.9 External brands resold by the affiliate who have completed and returned the external brand questionnaire. (% of external sales volume)	100%	FWF believes it is important for affiliates that have a retail/wholesale arm to at least know if the brands they resell are members of FWF or a similar organisation, and in which countries those brands produce goods.	Questionnaires are on file.	3	3	0
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Comment: Anna van Toor has informed all its existing and new external suppliers. A few external brands sent CSR reports and indicated BSCI membership. This has given Anna van Toor good insight in the initiatives regarding monitoring labour conditions of their external brands.

2.10 External brands resold by affiliates that are members of another credible initiative. (% of external sales volume)	0%	FWF believes affiliates who resell products should be rewarded for choosing to stock external brands who also take their supply chain responsibilities seriously.	External production data in FWF's information management system. Documentation of sales volumes of products made by FWF or FLA members.	0	3	0
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Recommendation: FWF recommends Anna van Toor to sell brands that are either a FWF member or have another acceptable system in place for monitoring its supply chain. When selecting new external brands to resell, in addition to the questionnaire, a separate email can be sent explaining FWF combined with the acquisition brochure.

MONITORING AND REMEDIATION

Possible Points: 35

Earned Points: 13

3. COMPLAINTS HANDLING

BASIC MEASUREMENTS	RESULT	COMMENTS
Number of worker complaints received since last check	0	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	0	
Number of worker complaints resolved since last check	0	

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 FWF membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	1	1	-1
3.2 System exists to check that the Worker Information Sheet is posted in factories	Yes	The Worker Information Sheet is a key first step in alerting workers to their rights.	Photos by company staff, audit reports, checklists from factory visits, etc.	2	2	0

Comment: During visits, Anna van Toor staff check whether the CoLP is posted by means of the company checklist. Factories that are not visited are requested to send a picture of the CoLP posted in the workflow.

3.3 Percentage of FWF-audited factories where at least half of workers are aware of the FWF worker helpline.	13%	The FWF complaints procedure is a crucial element of verification. If factory-based complaint systems do not exist or do not work, the FWF worker helpline allows workers to ask questions about their rights and file complaints. Factory participation in the Workplace Education Programme also count towards this indicator.	Percentage of audited factories where at least 50% of interviewed workers indicate awareness of the FWF complaints mechanism + percentage of factories in WEP programme.	1	4	-2
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Comment: Two trainings were conducted at suppliers in Turkey. The audit at the supplier in China showed workers were not yet aware of the Code of Labour Practice.

3.4 All complaints received from factory workers are addressed in accordance with the FWF Complaints Procedure	No complaints received	Providing access to remedy when problems arise is a key element of responsible supply chain management. Affiliate involvement is often essential to resolving issues.	Documentation that affiliate has completed all required steps in the complaints handling process.	N/A	6	-2
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3.5 Cooperation with other customers in addressing worker complaints at shared suppliers	No complaints or cooperation not possible / necessary.	Because most factories supply several customers with products, involvement of other customers by the FWF affiliate can be critical in resolving a complaint at a supplier.	Documentation of joint efforts, e.g. emails, sharing of complaint data, etc.	N/A	2	-2
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COMPLAINTS HANDLING

Possible Points: 7

Earned Points: 4

4. TRAINING AND CAPACITY BUILDING

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.1 All staff is made aware of FWF membership requirements	Yes	Preventing and remediating problems often requires the involvement of many different departments; making all staff aware of FWF membership requirements helps to support cross-departmental collaboration when needed.	Emails, trainings, presentation, newsletters, etc.	1	1	-1

Comment: Staff at Anna van Toor was made aware during the employee fashion shows that took place in February and August 2014 where audits and goals for FWF membership were presented. Sales staff are particularly informed about FWF by means of a presentation and by sharing brochures. The company newsletter has given an update on FWF membership as well. Furthermore, there is a company book for all employees with the mission, vision etc., including Fair Wear Foundation membership.

4.2 Ongoing training in support of FWF requirements is provided to staff in direct contact with suppliers.	No	Sourcing, purchasing and CSR staff at a minimum should possess the knowledge necessary to implement FWF requirements and advocate for change within their organisations.	FWF Seminars or equivalent trainings provided; presentations, curricula, etc.	0	2	0
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Recommendation: Sourcing, purchasing and CSR staff at a minimum should possess the knowledge and capacity necessary to implement FWF requirements.

Comment: A training for production staff took place in April 2015, which will be evaluated in the next performance check.

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 affiliate to ensure agents actively support the implementation of the CoLP.	Correspondence with agents, trainings for agents, FWF audit findings.	1	2	-2
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Recommendation: Given that they play a crucial part in monitoring and the follow up of Corrective Action Plans, it is recommended to provide additional training to ensure support of the implementation of the CoLP. Agreements must be made with agents regarding transparency of production locations and the improvements of working conditions.

Comment: Anna van Toor is in most cases dependent on the willingness of agents to cooperate. The company has discussed and informed all agents, but in some cases Anna van Toor experiences lack of response or cooperation to further implement the Code of Labour Practices on factory level.

4.4 Factory participation in Workplace Education Programme (where WEP is offered; by production volume)	13%	Lack of knowledge and skills on best practices related to labour standards is a common issue in factories. Good quality training of workers and managers is a key step towards sustainable improvements.	Documentation of relevant trainings; participation in Workplace Education Programme.	2	6	0
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Recommendation: Anna van Toor is encouraged to enrol a greater number of its suppliers in FWFs Workplace Education Programme (WEP), which offers trainings factories producing for FWF members. WEP trainings contribute to social dialogue between workers and management. The introductory training of WEP builds awareness of labour standards and strengthens dispute handling mechanisms. It is made available to FWF members free of charge.

Comment: Anna van Toor sources at two factories in Turkey where a FWF training on social dialogue took place, including at one subcontractor.

4.5 Factory participation in trainings (where WEP is not offered; by production volume)	0%	In areas where the Workplace Education Programme is not yet offered, affiliates may arrange trainings on their own or work with other training-partners. Trainings must meet FWF quality standards to receive credit for this indicator.	Curricula, other documentation of training content, participation and outcomes.	0	4	0
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Recommendation: All factory workers should be informed about the labour standards. In order to further communication between employers and workers in the workplace FWF recommends affiliates to arrange trainings on their own in areas where the Workplace Education Programme is not yet offered. Trainings must meet FWF quality standards to receive credit for this indicator: top management, supervisors and workers should be included in the trainings, separately. Workplace standards and dispute handling should be included in the training. At least 10-20% of the workforce must be trained, depending on the size of the factory. Worker participations should be balanced and representative.

TRAINING AND CAPACITY BUILDING

Possible Points: 15

Earned Points: 4

5. INFORMATION MANAGEMENT

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
5.1 Level of effort to identify all production locations	Intermediate	Any improvements to supply chains require affiliates to first know all of their production locations.	Supplier information provided by affiliate. Financial records of previous financial year. Documented efforts by affiliate to update supplier information from its monitoring activities.	3	6	-2

Recommendation: FWF encourages Anna van Toor to continue with its efforts to include subcontractor information in the supplier list and establish a more direct relationship with the production locations.

Comment: Anna van Toor has actively worked on obtaining complete information of its entire supplier base. With the completed questionnaires from suppliers, information has been added to the supplier list. The company is working on obtaining the exact purchasing volume and factory data for subcontractors.

5.2 A system exists to allow purchasing, CSR and other relevant staff to share information with each other about working conditions at suppliers	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
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Comment: The production department is involved in the implementation of FWF policy at Anna van Toor. Production managers decide at which factory audits need to be conducted. Production staff was made familiar with the work plan and the Code of Labour Practices by the production manager who is overall responsible for FWF membership. This person also regularly updates the management team regarding audit results or other progress outcomes. During weekly meetings, all factories are discussed with the production team which can include updates related to FWF membership.

INFORMATION MANAGEMENT

Possible Points: 7

Earned Points: 4

6. TRANSPARENCY

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
6.1 Communication about FWF membership adheres to the FWF communications policy	Yes	FWF membership should be communicated in a clear and accurate manner. FWF guidelines are designed to prevent misleading claims.	Logo is placed on website; other communications in line with policy. Affiliates may lose points if there is evidence that they did not comply with the communications policy.	1	1	-2

Recommendation: It is recommended to include the description of FWF membership at the 'about Anna van Toor' section on the website instead of the news section.

Comment: The public is informed of FWF membership via Facebook, Twitter and the corporate website. In addition, the FWF logo and an explanatory text of Fair Wear Foundation is included in the brochures to make consumers aware of membership. Description of FWF membership is in line with the communications policy.

6.2 Affiliate engages in advanced reporting activities	No	Good reporting by members helps to ensure the transparency of FWF's work and shares best practices with the industry.	Affiliate publishes one or more of the following on their website: Brand Performance Check, Audit Reports, Supplier List.	0	1	0
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Recommendation: FWF recommends the affiliate to publish one or more of the following reports on its website: brand performance check, audit reports, supplier information. Good reporting by members helps to ensure the transparency of the affiliate and FWF's work.

6.3 Social Report is submitted to FWF and is published on affiliate's website	Published on affiliate's website	The Social Report is an important tool for affiliates to transparently share their efforts with stakeholders.	Report adheres to FWF guidelines for Social Report content.	2	2	-2
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TRANSPARENCY

Possible Points: 4

Earned Points: 3

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 FWF policies are integrated into the structure of the company.	Meeting minutes, verbal reporting, Powerpoints, etc.	2	2	0

Comment: Anna van Toor evaluates FWF membership requirements with top management. After the first audit, a meeting was organised to discuss the outcomes with management and production staff.

7.2 Changes from previous Brand Performance Check implemented by affiliate	25%	In each Brand Performance Check report, FWF may include requirements for changes to management practices. Progress on achieving these requirements is an important part of FWF membership and its process approach.	Affiliate should show documentation related to the specific requirements made in the previous Brand Performance Check.	2	4	-2
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Comment: Previous performance check showed two requirements: 1. setting up a formal process to analyse the risks of labour violations in the production areas that influences the purchasing decisions. Anna van Toor has started working on a system to identify possible labour violations, which is still in progress to further integrate it into sourcing and monitoring decisions. The requirement is partly improved. 2. taking an active role in discussing living wages with suppliers. During last year Anna van Toor has focused on gaining better insight into all the production locations, before taking on the topic of living wages.

EVALUATION

Possible Points: 6

Earned Points: 4

RECOMMENDATIONS TO FWF

Anna van Toor indicated their financial system used to update supplier data lists FOB figures including fabric as well as FOB figures excluding fabric. This gives an unbalanced view of the importance of suppliers for Anna van Toor. According to Anna van Toor, number of pieces would give a better indication. Moreover Anna van Toor felt it took too much time before receiving audit reports.

SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	18	40
Monitoring and Remediation	13	35
Complaints Handling	4	7
Training and Capacity Building	4	15
Information Management	4	7
Transparency	3	4
Evaluation	4	6
Totals:	50	114

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

44

PERFORMANCE BENCHMARKING CATEGORY

Good

BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

09-04-2015

Conducted by:

Annabel Meurs

Interviews with:

Chantelle van Toor (General Manager)

Jan Paul van Toor (Marketing & Sales Manager)

Karin Hooimeijer (Product Manager)

Lisette van Toor (Communication)

Audit Summary:

Publication of the audit summary section previously included in Brand Performance Checks has been suspended while Fair Wear Foundation develops a new information system to manage and summarize the data.