



BRAND PERFORMANCE CHECK

Continental Clothing Company Ltd

PUBLICATION DATE: OCTOBER 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

Continental Clothing Company Ltd

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

AFFILIATE INFORMATION	
Headquarters:	London, United Kingdom
Member since:	02-10-2006
Product types:	Fashion, Promotional, Private label, Bags & Accessories
Production in countries where FWF is active:	Bangladesh, China, India, Turkey
Production in other countries:	
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	90%
Benchmarking score	78
Category	Leader

Summary:

Continental meets most of FWF's management system requirements and goes beyond some of them. Continental has a relatively small number of suppliers. It sources from five suppliers in India, Bangladesh and Turkey. Continental has monitored 90% of its 2014 purchasing volume and therefore meets FWF's monitoring threshold required of brands in 3+ years of membership. This, in addition to high leverage at suppliers and the stable relationships with suppliers, gives the company a strong basis for effectively improving working conditions.

Continental systematically works towards resolution of corrective actions with all of its suppliers. After audits, remediation steps were taken and follow up is being closely monitored. Because of its open costing system, Continental is able to identify the cost of the cutmake (CM) process, which (among others) includes the labour costs. When Continental is able to investigate further and determine more precisely the labour minute costs for its products, it should have a better understanding whether its FOB prices support payment of living wages. This could then form the basis for discussion with management at suppliers where Continental has high leverage, to move towards payment of living wages.

Continental can take further steps towards analysing the root causes of excessive overtime, as well as living wages, and how this relates to its own buying practices. Furthermore, it can be more transparent in communicating about FWF and labour conditions at its suppliers publicly.

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	89%	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.	4	4	0

Comment: Continental Clothing sources from 5 suppliers in Bangladesh, India and Turkey. At four of these, Continental's FOB volume accounts for more than 10% of the suppliers' production capacity.

1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years	60%	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.	3	4	0
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Comment: Continental enjoys very stable business relations, having actively supported the establishment of suppliers in India and Bangladesh. Continental supports its suppliers to find customers when these are not able to fill all the available production capacity.

1.3 All new suppliers are required to sign and return the Code of Labour Practices before first orders are placed.	No new suppliers	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.	N/A	2	0
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1.4 Company conducts human rights due diligence at all new suppliers before placing orders.	No new suppliers	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.	N/A	4	0
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Comment: Continental did not start business relations with new suppliers in 2014.

1.5 Supplier compliance with Code of Labour Practices is evaluated in a systematic manner.	Yes, and performance improvement is rewarded	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.	2	2	0
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Recommendation: Continental is encouraged 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.

Comment: Continental arranged FWF audits at its suppliers, and follows up frequently on corrective action plans to ensure improvements are made. Continental has five suppliers in different countries. Each of the suppliers has its own specialty in production. Continental has gradually reduced purchasing volume at suppliers that are not responsive and willing to make improvements, and, as a result, has increased the total FOB volume at suppliers that are more open to make improvements.

1.6 The affiliate's production planning systems support reasonable working hours.	Strong, integrated systems in place.	Affiliate production planning systems can have a significant impact on the levels of excessive overtime at factories.	Documentation of robust planning systems.	4	4	0
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Recommendation: A good production planning system needs to be established based on the production capacity of the factory for regular working hours.

Comment: Continental books a number of production lines at each of its suppliers and guarantees to fill this capacity. Continental aims to maintain a continuous production output throughout the year at its principal factories and produce 3-4 times a year at the other factories. Continental announced production plans in the beginning of the year and communicated with suppliers weekly to update itself on the status of production. Suppliers always have at least 2 months leadtime before production starts and volume is known well in advance. Continental is also flexible to allow extra time for production when needed and does not penalize suppliers when delays occur.

1.7 Degree to which affiliate mitigates root causes of excessive overtime.	Intermediate 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.	3	6	0
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Recommendation: Continental could discuss with factory management on the causes of excessive overtime and provide support to manage overtime.

Comment: At one of Continental's suppliers in India, where it has high leverage, FWF audits show that overtime was reduced significantly. At other factories, excessive overtime still remains a problem. Continental thinks that other brands being strict on deadlines creates pressure at the factories to perform overtime.

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: 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: Continental and its suppliers use open costing to negotiate prices. The costs for material and CM are therefore known, as well as the factories' profit margin. When prices of yarn fluctuate, or labour costs increase, this will lead to adjustments of the FOB prices. This transparent system reduces the incentive for hard price negotiations. However, as the labour costs are included in the CM price, which also includes overhead, the labour cost are not known precisely. Nonetheless, based on its knowledge of the daily outputs per production line, Continental has a good understanding of the labour costs per product.

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.	Supply chain approach	Sustained progress towards living wages requires adjustments to affiliates' policies.	Documentation of policy assessments and/or concrete progress towards living wages.	6	8	0

Recommendation: FWF encourages Continental to discuss with suppliers about possibilities to work towards higher benchmarks. FWF has developed experience with approaches that ensure that production workers in the selected facility take full benefit from the additional amounts that are committed to wage increases. FWF could give companies specific guidance on process rollout on request.

FWF advises companies to avoid the concept of a one-time charitable contribution, and strongly recommends Continental to commit to a long term process that leads to sustainable implementation of living wages. FWF also recommends Continental to seek collaboration with other brands sourcing at suppliers concerned, and develop a joint approach to improve wages. FWF is in the position to give advice on measures that need to be taken by the affiliates to ensure compliance with anti-trust/anti-competition legislation in relevant jurisdictions.

Comment: FWF audits show that Continental’s suppliers pay legal minimum wages, but salary levels remain well below living wage benchmarks. Continental maintains long-term relations with a small number of suppliers and sources significant quantities at most. This provides stability for suppliers concerned and reduces the business risk. It helps factories to focus on developing themselves, which includes social compliance and product quality.

At one of its suppliers in India, Continental managed to change the payment structure from piece rate to time rate, which reduced the pressure to produce as quickly as possible. Continental plans to initiate a living wage project at this supplier, which it helped establish.

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: 34

Earned Points: 26

2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	90%	
% of own production in low risk production countries where FWF's Low Risk policy has been implemented	0%	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	90%	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
2.2 Degree of progress towards resolution of existing Corrective Action Plans	Advanced	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.	8	8	-2

Recommendation: To facilitate remediation, Continental could consider:

- Hire a 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.
- providing financial support to the supplier for implementing improvements.

Comment: Continental tracks progress on all CAPs from all audits, including FWF audits and audits by other initiatives, such as BSCI and the Accord. The product and sustainability manager of Continental visits factories several times a year to raise awareness, discuss implementation and encourage factories to make improvements. The status of findings is monitored in a systematic approach and status updates are requested every month. Efforts that are coordinated between different staff that have influence over supply chain conditions. Proof of remediation work is collected. Documents and pictures are filed in the CAP and the status of findings monitored during visits. Continental's suppliers had made significant improvements on occupational health and safety and other issues. Though some improvements were observed during re-audits, issues regarding overtime and wages are more complicated and require more time.

2.3 Percentage of production volume from suppliers that have been visited by the affiliate in the past financial year	100%	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.	4	4	0
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

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

Comment: For one supplier in China, Continental has collected a third party audit report conducted by BSCI. It also collects inspection reports from the Accord for its supplier in Bangladesh.

2.5 Audit Report and Corrective Action Plan (CAP) findings are shared with factory. Improvement timelines are established in a timely manner	Yes	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.	2	2	-1
2.6 High risk issues specific to the affiliate's supply chain are identified and addressed by the monitoring system.	Advanced 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.	6	6	0

Recommendation: Knowing the country specific risks facilitates the starting point for discussing this with suppliers. Continental can agree on additional commitments that are required to mitigate risks. Continental is recommended to motivate its supplier in China and Bangladesh to participate in the Workplace Education Programme.

Comment: All of Continental's production takes place in high-risk countries Bangladesh, India and Turkey. Continental demonstrates high awareness of the specific risks in countries concerned. Continental visits its suppliers regularly and addresses issues identified in the FWF audit reports.

In India, Continental's two suppliers participated in FWF's Workplace Education Programme to increase workers' knowledge on their rights and communication skills with management. At one factory, where high risk of restriction of movement is found, Continental cooperates with FWF and other members to work on an improvement plan.

2.6a High risk issues specific to Bangladesh are identified and addressed by the monitoring system and remediation activities.	Advanced Capacity	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.	3	3	0
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Comment: Continental has one supplier in Bangladesh, which has participated in FWF's workshop on safety principles. The factory has been audited by FWF at the request of Continental. In addition, the factory has been inspected by the Accord on fire and building safety and only minor issues were found, which were quickly remediated. Continental also followed up on the CAPs that follow from the Accord's inspections. The supplier has recently been enrolled in FWF's Workplace Education Programme.

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
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2.7 Affiliate cooperates with other customers in resolving corrective actions at shared suppliers	Information sharing	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.	1	2	-1
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Recommendation: Cooperation among customers increases leverage, the chances of successful outcomes and long term improvements.

Comment: In a factory in India, Continental has actively involved with FWF and other members to handle the high risk issue of freedom of movement, which is a typical issue for migrant workers in Tirupur. At another shared supplier in Turkey, where several FWF members are active, Continental feels that commercial interests stand in the way of sharing information or collaborating on audits or CAPs with other brands.

2.8 Monitoring requirements are fulfilled for production in low-risk countries	No production in lowrisk countries	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.	N/A	2	0
2.9 External brands resold by the affiliate who have completed and returned the external brand questionnaire. (% of external sales volume)	No external brands resold	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.	N/A	3	0
2.10 External brands resold by affiliates that are members of another credible initiative. (% of external sales volume)	No external brands resold	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.	N/A	3	0

MONITORING AND REMEDIATION

Possible Points: 30

Earned Points: 27

3. COMPLAINTS HANDLING

BASIC MEASUREMENTS	RESULT	COMMENTS
Number of worker complaints received since last check	2	At this point, FWF considers a high number of complaints as a positive indicator, as it shows that workers are aware of and making use of the complaints system.
Number of worker complaints in process of being resolved		
Number of worker complaints resolved since last check	2	

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

Requirement: Continental must ensure that the Worker Information Sheet, including contact information of the local complaints handler of FWF, is posted at its supplier in China in a location that is accessible to all workers. Continental should check by means of a visit whether the Worker Information Sheet is posted in the factories.

Comment: Continental has asked all suppliers to post the Workers Information Sheet and send pictures. Continental visits its suppliers frequently and checks that the CoLP is posted. Pictures are kept on file. However, Continental is not certain that the Worker Information Sheet is posted at its supplier in China.

3.3 Percentage of FWF-audited factories where at least half of workers are aware of the FWF worker helpline.	73%	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.	3	4	-2
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Recommendation: Continental is recommended to work with its suppliers to provide awareness raising training to workers in the factories concerned.

Comment: A 2014 audit at a supplier in Turkey showed that less than 50% of workers were aware of the FWF CoLP and helpline. WEP trainings were organized at three suppliers in India previously during the past three years.

3.4 All complaints received from factory workers are addressed in accordance with the FWF Complaints Procedure	Yes	Providing access to remedy when problems arise is a key element of responsible supply chain management. Affiliate involvement is often essential to resolving issues.	Documentation that affiliate has completed all required steps in the complaints handling process.	3	6	-2
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3.5 Cooperation with other customers in addressing worker complaints at shared suppliers	Active cooperation	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.	2	2	-2
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Comment: In 2014 two complaints was filed against a supplier of Continental that is shared with several other FWF members. One of the brands addressed the complaint with the supplier, which was resolved quickly.

COMPLAINTS HANDLING

Possible Points: 15

Earned Points: 11

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: Every year when the new catalogue is launched, the FWF Code of Labour Practices and membership requirements are discussed with all staff. Social reports and brand performance checks are shared with all colleagues within Continental.

4.2 Ongoing training in support of FWF requirements is provided to staff in direct contact with suppliers.	Yes	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.	2	2	0
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Comment: The head of products is in frequent contact with the suppliers. He is at the same time responsible for compliance. The production manager is also familiar with FWF and its membership requirements.

4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices.	Affiliate does not use agents	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.	N/A	2	-2
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4.4 Factory participation in Workplace Education Programme (where WEP is offered; by production volume)	60%	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.	6	6	0
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Recommendation: In order to ensure awareness and enhance understanding of the relevant labour standards, grievance mechanisms and the importance of a good mechanism for communication between employers and workers in the workplace, FWF developed the Workplace Education Programme. This programme is offered in the 4 priority countries. Continental is encouraged to involve its suppliers in Bangladesh and China to participate in the Workplace Education Programme.

Comment: Since 2012, Continental has enrolled its suppliers in India and Turkey in the WEP.

4.5 Factory participation in trainings (where WEP is not offered; by production volume)	All production is in WEP areas.	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.	N/A	4	0
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TRAINING AND CAPACITY BUILDING

Possible Points: 9

Earned Points: 9

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: Continental could do more to monitor the subcontractors and ensure the CoLP is posted at all production locations.

Comment: Continental has five suppliers and visits them annually. Continental is aware of the production locations of its suppliers and the possible use of subcontractors. However, at one of the suppliers in India, a recent FWF audit found that subcontractors were used without informing Continental. Continental addressed this issue directly with the supplier concerned.

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: Information about suppliers, including audits and CAP status updates, is shared between all staff responsible for product development, sustainability, quality control and production.

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	No	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.	-2	1	-2

Comment: Continental communicates about FWF through on-garment labels, the company website, social report and the company catalogue. Membership is described in correct wording. Continental, however, has been using incorrect logos to date. Furthermore, despite its efforts, it is difficult for Continental to control how its customers communicate about the sustainability credentials of its products, including FWF membership.

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: Continental is suggested to publish its brand performance check report, names of suppliers or factory audit reports on its website.

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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Comment: Continental's website shows a link to the social report posted on FWF's website.

TRANSPARENCY

Possible Points: 4

Earned Points: 0

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: Continental considers that there is no alternative for social sustainability than FWF.

7.2 Changes from previous Brand Performance Check implemented by affiliate	No requirements were included in previous Check	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.	N/A	4	-2
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EVALUATION

Possible Points: 2

Earned Points: 2

RECOMMENDATIONS TO FWF

- FWF is too defensive on the use of FWF logos by FWF members and its customers
- FWF could offer more practical guidance to members that are interested to embark on a Living Wage project at (one of) its suppliers.

SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	26	34
Monitoring and Remediation	27	30
Complaints Handling	11	15
Training and Capacity Building	9	9
Information Management	4	7
Transparency	0	4
Evaluation	2	2
Totals:	79	101

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

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PERFORMANCE BENCHMARKING CATEGORY

Leader

BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

10-08-2015

Conducted by:

Koen Oosterom

Interviews with:

Mariusz Stochaj, Head of Product and Sustainability

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.