



BRAND PERFORMANCE CHECK

K.O.I. International b.v.

PUBLICATION DATE: JUNE 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

K.O.I. International b.v.

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

AFFILIATE INFORMATION	
Headquarters:	Amsterdam, Netherlands
Member since:	01-01-2013
Product types:	Fashion
Production in countries where FWF is active:	India, Tunisia
Production in other countries:	Greece, Italy, Netherlands, Spain
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?	No
SCORING OVERVIEW	
% of own production under monitoring	42%
Benchmarking score	33
Category	Suspended

Summary:

K.O.I has shown insufficient progress in implementing FWF's management system.

As a recently founded denim brand, K.O.I has been working to set up the company's structure. Staff have acknowledged that capacity issues related to the brand's growth have contributed to inadequate attention to social issues in the past year.

A process for monitoring working conditions is not yet embedded in the company; the monitoring threshold for second year of membership has not been met; formal supplier selection and review processes related to labour standards are not yet systematically integrated; and K.O.I. has not implemented the changes required from the last Brand Performance Check.

K.O.I has for the above reasons received a Needs Improvement rating for the 2nd year in a row. In accordance with FWF policies, K.O.I.'s membership is suspended as of 1 June 2015. K.O.I. has characteristics – detailed insight into their supply chain, close supplier relationships and a willingness to publish their supplier list - that could form a solid foundation for a successful membership. Currently K.O.I is working on creating more capacity and has made steps to ensure processes structurally embed FWF requirements in their management systems. In the coming months, FWF will assess with K.O.I. whether they have been able to take the steps necessary to achieve a 'Good' rating at the next performance check, or whether membership will be terminated.

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	0%	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.	0	4	0

Comment: Even though K.O.I is a growing fashion label expanding their production rapidly, order quantities remain small compared to the larger denim brands operating in a similar market. The share of production coming from factories where the brand buys at least 10% of the production capacity is limited. However, the close cooperation in terms of sourcing with the other brands in the fashion group, helps K.O.I gain more leverage at the factories. With growth of the company the strategy for denim is to produce all denims with 1 factory in Tunisia, 1 laundry in Tunisia and 2 laundries in Italy in the next years. K.O.I's strategy is to produce close to home and consolidate as much as possible. Production from India will likely be withdrawn.

1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years	52%	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: K.O.I has been working with three of its main factories/laundries since the start of the company.

1.3 All new suppliers are required to sign and return the Code of Labour Practices before first orders are placed.	No	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.	0	2	0
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Requirement: K.O.I needs to ensure that new suppliers sign and return the questionnaire.

Comment: K.O.I has started working with 2 new suppliers in India in 2014 and 2 in Greece. The Code of Labour Practices was not sent.

1.4 Company conducts human rights due diligence at all new suppliers before placing orders.	No	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.	0	4	0
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Requirement: A formal process should exist to evaluate the risks of labour violations in the production areas the affiliate is operating. This evaluation should influence the decision on whether to place orders, how to prevent and mitigate risks, and what remediation steps may be necessary.

Recommendation: The basic health and safety guidelines that FWF has developed can be used to do a first assessment in terms of health and safety when visiting the production locations. Collecting existing audit reports or information from other brands, reading the FWF country material and discussing the Code of Labour Practices can form the initial assessment of the working conditions of potential new suppliers.

Comment: Suppliers are first and foremost selected for their ability to use organic sources and whether they have certification regarding environmental standards. Experience learns those suppliers are also willing to improve labour standards. However, there is no formalized system in place to assess working conditions when visiting and selecting new suppliers

1.5 Supplier compliance with Code of Labour Practices is evaluated in a systematic manner.	No	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.	0	2	0
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Requirement: A systematic approach is required to integrate social compliance into normal business processes, and supports good decision-making. The approach needs to ensure that the affiliate consistently evaluates the entire supplier base and includes information into decision-making procedures.

Recommendation: K.O.I is encouraged to develop an evaluation system for suppliers where compliance with labour standards is a criterion for future order placement. The company could discuss progress of suppliers during team meetings to ensure evaluation of labour standards is integrated in the company's processes.

Comment: K.O.I evaluates business relationships continuously as part of their ongoing quality control and constant communication with suppliers. Progress on working conditions is not embedded in the evaluation.

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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Comment: Given that product development takes place in close cooperation with suppliers, the planning is a shared process with frequent feedback and communication. Forecast is shared in the beginning stage after which fabric is reserved. For the factories in Italy and Tunisia, K.O.I is able to track every stage of production including the moment the fabric arrives, to the washing and finishing. Delays are mostly anticipated and included already in the lead times. K.O.I is aware of the production capacity of its suppliers, including which production lines are used for their order, and knows the time needed for production, washing and finishing. During summer in Italy or Ramadam in Tunisia, the output is spread and lead times extended.

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: K.O.I could discuss with factory management on the causes of overtime found during the 2014 audit in Tunisia.

Comment: K.O.I is in the position to prioritize some orders first and to produce Never Out of Stock items in low season since core basics can be produced throughout the year. The company is present during the washing and finishing stage to closely monitor the washings.

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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Comment: K.O.I pricing policy is cost-price up. K.O.I knows the cost break down per production process: stitching, washing etc., but does not know the exact cost of labour. K.O.I is aware of all minimum wage levels and has collected information from the factory managers in Tunisia regarding the salaries paid.

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
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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
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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.	Basic approach	Sustained progress towards living wages requires adjustments to affiliates' policies.	Documentation of policy assessments and/or concrete progress towards living wages.	2	8	0
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Recommendation: In case production continues in India, K.O.I is recommended to investigate the wage levels at the factories in India.

Comment: Given the changes in the political system in Tunisia, wages have gone up significantly. Wages are now established through a multi stakeholder process in cooperation with trade unions and local stakeholders which resulted in a national Collective Bargaining Agreement. Given the small order quantities of K.O.I it does not feel in a position to discuss living wages. The audit conducted at the supplier in Tunisia showed mode wages were above the living wage benchmark.

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
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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
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PURCHASING PRACTICES

Possible Points: 40

Earned Points: 16

2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	42%	
% 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	42%	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: Two sourcing managers and the CEO are responsible for monitoring the implementation of the Code of Labour Practices.

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.

Comment: The audit at the factory in Tunisia showed a number of improvement points, including several health and safety issues, low awareness of workers and issues on the correct use of the CBA stipulations. K.O.I has not discussed the findings with the factory.

2.3 Percentage of production volume from suppliers that have been visited by the affiliate in the past financial year	90%	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
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Recommendation: It is recommended to make discussing the status of working conditions and corrective action plans part of the visits.

2.4 Existing audit reports from other sources are collected.	No	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.	0	3	0
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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.

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: FWF affiliate 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.	Insufficient 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.	0	6	0
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Recommendation: Knowing the country specific risks facilitates the starting point for discussing this with suppliers. Companies can agree on additional commitments that are required to mitigate risks. K.O.I encouraged to schedule more audits as a way of assessing risks. It is recommended to make use of the upcoming FWF country study for Tunisia, the FWF risk assessment for Italy and in case production starts in Turkey, the guidelines on Syrian refugees.

Comment: The main risk associated with the denim production is related to health and safety issues for the worker, particularly in the washing process. K.O.I works with sustainable materials, but the dying of denim remains posing risks for the health of workers. K.O.I does not use sandblasting for denim, but works closely with suppliers on other treatments such as ozone and laser. K.O.I looks at the ventilation in factories/suction system in factories and laundries for workers working with dye material and sprays. Given the very small volume, potential risks in India are not yet identified. Further risks in terms of labour standards are not yet systematically addressed in the monitoring efforts.

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	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

Comment: K.O.I shares a production location with another FWF affiliate where an audit took place but has not cooperated on the follow up of the Corrective Action Plan.

2.8 Monitoring requirements are fulfilled for production in low-risk countries	No	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.	0	2	0
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Requirement: Monitoring requirements need to be fulfilled for production in low-risk countries; factories need to:

- Be visited annually by affiliate representatives
- Be informed of FWF membership and return the completed CoLP questionnaire before production orders are placed
- Be aware of specific risks identified by FWF
- Have the FWF Worker Information Sheet posted in local languages.

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
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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
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MONITORING AND REMEDIATION

Possible Points: 29

Earned Points: 4

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	No	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.	0	2	0

Requirement: K.O.I must ensure that the Code of Labour Practices, including contact information of the local complaints handler of FWF, is posted in factories in a location that is accessible to workers. K.O.I should check by means of a visit whether the CoLP is posted in the factories.

3.3 Percentage of FWF-audited factories where at least half of workers are aware of the FWF worker helpline.	0%	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.	-2	4	-2
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Requirement: K.O.I should inform the factory managers about the existence of the hotline. The information sheet is the first step towards awareness raising about the existence and functioning of FWFs worker hotline.

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: -1

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 is made aware of FWF membership requirements through internal meetings. New employees are informed and material is shared via the internal server.

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
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

Recommendation: Agents can be involved to actively support the implementation of the CoLP.

Comment: The agents in India and Greece are informed about the Code of Labour Practices, but not yet involved in the assessment and monitoring of working conditions.

4.4 Factory participation in Workplace Education Programme (where WEP is offered; by production volume)	0%	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.	0	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. K.O.I should motivate its main supplier(s) in Tunisia to join WEP trainings.

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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Comment: All production are either in low risk countries or in countries where WEP is offered: Tunisia and India. A very small percentage below 2% is produced in Greece and Spain.

TRAINING AND CAPACITY BUILDING

Possible Points: 11

Earned Points: 2

5. INFORMATION MANAGEMENT

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
5.1 Level of effort to identify all production locations	Advanced	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.	6	6	-2

Comment: K.O.I has clear insight into their supply chain, including subcontractors and laundries. Given the close cooperation in the washing stage, suppliers are frequently visited. The production orders include which unit is used in terms of printing, finishing, embroidery etc.

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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Recommendation: It is recommended to include FWF topics on the agenda during product team meeting.

Comment: Within K.O.I all staff involved with suppliers are in the same team. A new sourcing manager was hired to expand the team and create more capacity to work on improving working conditions.

INFORMATION MANAGEMENT

Possible Points: 7

Earned Points: 7

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: K.O.I can include a link to FWF's website on the company website.

Comment: FWF membership is communicated in correct wording on the company website and catalogue.

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
6.3 Social Report is submitted to FWF and is published on affiliate's website	Complete report submitted to FWF	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.	1	2	-2

TRANSPARENCY

Possible Points: 4

Earned Points: 2

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: FWF membership is evaluated with staff internally. K.O.I recognizes the need for more capacity and processes to structurally embed FWF requirements in their management systems.

7.2 Changes from previous Brand Performance Check implemented by affiliate	14%	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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- Requirement:** 1. : K.O.I needs to ensure that new suppliers sign and return the questionnaire.
2. : A formal process should exist to evaluate the risks of labour violations in the production areas the affiliate is operating. This evaluation should influence the decision on whether to place orders, how to prevent and mitigate risks, and what remediation steps may be necessary.
3. Monitoring requirements need to be fulfilled for production in low-risk countries in order for it to be counted towards the monitoring threshold. All production sites in low-risk countries must:
- Be visited at least annually by affiliate representatives;
 - Be informed of FWF membership and return the completed CoLP questionnaire before production orders are placed;
 - Post the FWF Worker Information Sheet in local languages.
4. K.O.I must ensure that the Code of Labour Practices, including contact information of the local complaints handler of FWF, is posted in factories in a location that is accessible to workers. K.O.I should check by means of a visit whether the CoLP is posted in the factories.
5. : K.O.I should inform the factory managers about the existence of the hotline. The information sheet is the first step towards awareness raising about the existence and functioning of FWFs worker hotline.
6. FWF asked K.O.I to include a link to FWF's website on the company website
7. FWF approach requires transparency on affiliates work towards social standards. The social report needs to be submitted to FWF and published on K.O.I's website.

Comment: Last performance check showed 7 requirements. K.O.I has followed up on 1 requirement by submitting the social report. K.O.I has not been able to improve the most crucial requirements that form the basis of FWF membership.

EVALUATION

Possible Points: 6

Earned Points: 4

RECOMMENDATIONS TO FWF

N/A

SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	16	40
Monitoring and Remediation	4	29
Complaints Handling	-1	7
Training and Capacity Building	2	11
Information Management	7	7
Transparency	2	4
Evaluation	4	6
Totals:	34	104

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

33

PERFORMANCE BENCHMARKING CATEGORY

Suspended

BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

29-04-2015

Conducted by:

Annabel Meurs

Interviews with:

Tony Tonnaer (CEO)

Lennaert Nijgh (Product Manager)

Kirsten Zwart (Sourcing Manager)

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.