



## BRAND PERFORMANCE CHECK

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K.O.I. International b.v.

this report covers the evaluation period 01-01-2015 to 31-12-2015

## 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](http://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: 01-01-2015 to 31-12-2015

AFFILIATE INFORMATION	
Headquarters:	Amsterdam, Netherlands
Member since:	01-01-2013
Product types:	Fashion
Production in countries where FWF is active:	India, Tunisia, Turkey
Production in other countries:	Greece, Hong Kong, Italy, Netherlands, Spain, United States
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	53%
Benchmarking score	55
Category	Good: 55

## Summary:

Last year K.O.I. was suspended, but now K.O.I. meets most of FWF's management system requirements. 53 % of the company's production volume is under monitoring. This is below the 90 % required of brands in 3+ years of membership. Because K.O.I. does not continue its relation with one of the main suppliers, FWF and K.O.I. agreed that this supplier did not need to be monitored. Because the benchmarking score is sufficient K.O.I. earns a good rating. If the supplier would have been monitored, the monitoring threshold of 90% would have been passed. FWF expects that next year K.O.I. monitors 90 % of the production volume again.

K.O.I. has shown much progress in implementing FWF's management system and was able to follow up on three of the requirements in the Brand Performance Check of last year. FWF expects K.O.I. to follow up on the requirements for low risk countries and take more action to get the production agents involved in monitoring. FWF encourages K.O.I. to organize WEPs at their largest suppliers to increase awareness and understanding on labour standards and the complaints hotline.

## 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	80%	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: The share of purchasing volume coming from factories where the brand buys at least 10% of the production capacity has grown significantly. Moreover, 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.

1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years	55%	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, also those located in low risk countries, sign and return the questionnaire.

Comment: K.O.I. has made sure that questionnaires were being sent and returned from suppliers in high risk countries but did not take the same measure for suppliers in low risk countries.

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:** K.O.I. prefers new suppliers to be based in what they refer to as ‘the Mediterrean’. This includes Europe, Turkey and Tunisia. Turkey and Tunisia are considered high risk countries by FWF, and FWF has made extra guidance documents available for Turkey and recommends extra monitoring measures.

**Comment:** During a first meeting with a potential new supplier K.O.I. discusses their membership with FWF. K.O.I. uses the factory checklist to do a first assesment. K.O.I. has requested audit reports from new suppliers, but so far only one has sent them an audit report. K.O.I. assesed the quality by making use of the FWF Quality Assesment Tool. K.O.I. also reads the country studies to be aware of the country specific risks.

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:** K.O.I is encouraged to develop an evaluation system for suppliers where compliance with and commitment to labour standards is a condition for future order placement. In this way the member can consistently evaluate the entire supplier base and include information into decision-making procedures.

**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, However, when a supplier does not show any progress on remediation of the issues identified in the Corrective Action Plan, the CSR manager will flag this during the weekly sourcing meeting,

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. If there are more delays, K.O.I. does not apply a penalty to their suppliers for delayed delivery, even though K.O.I. might need to calculate a discount for their late delivery to clients. 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 the different production phases such as stitching, washing and finishing. During summer in Italy or Ramadam in Tunisia, the output is spread and lead times are 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. should discuss with factory management on the causes of overtime found during the 2015 audits in Tunisia.

**Comment:** Production orders are spread throughout the season to avoid peak times. 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. Despite these efforts, the audits in Tunisia found 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:** FWF recommends K.O.I. to ask their apparel suppliers for a cost break down. A next step would be to calculate the labour minutes per style to be able to calculate the exact costs of labour.

**Comment:** K.O.I. pricing policy is cost-price up. For their two denim factories, K.O.I. knows the cost break down per production process: stitching, washing etc and the gross margin for the supplier, but does not know the exact costs of labour. K.O.I. is aware of all minimum wage levels. The company does not negotiate on prices but want their suppliers to come with realistic prices that cover production costs. This could even mean that K.O.I. decides to take less margin on a 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
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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: When production continues in India, K.O.I. is recommended to investigate the wage levels at the factories in India.

Comment: The audits conducted at the suppliers 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: 25

## 2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	43%	
% of own production in low risk production countries where FWF's Low Risk policy has been implemented	10%	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	53%	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: A CSR manager is responsible for monitoring the implementation of the Code of Labour Practices.

2.2 Degree of progress towards resolution of existing Corrective Action Plans	Intermediate	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.	4	8	-2
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Requirement: FWF member companies are 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.

**Recommendation:** To facilitate remediation, the member company 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 with suppliers.
- Provide financial support to the supplier for implementing improvements

**Comment:** A follow-up audit in the factory at Tunisia showed important improvements. K.O.I. also consistently discusses and monitors the progress of the other monitored factories in Turkey and India.

2.3 Percentage of production volume from suppliers that have been visited by the affiliate in the past financial year	88%	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 include discussing the status of working conditions and corrective action plans in all visits.

**Comment:** K.O.I. visits most of their production locations, and the visiting staff is informed by the CSR manager on CoLP issues.

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 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. Therefore we recommend that K.O.I. requests existing audit reports of other suppliers as well, directly or via their agent.

**Comment:** K.O.I. requested existing audit reports from several suppliers, but so far only one of their suppliers in Tunisia has sent them a report back. The member company used the FWF Quality Assessment Tool to assess the quality of that report.

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
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**Comment:** CAPs and audit reports are shared with the monitored factories. K.O.I. checks the status of remediation continuously. Suppliers send pictures back to prove remediation. When K.O.I. staff visits the factories, the CSR manager explains the relevant CAP in detail, to make sure everything is understood by and can be discussed with the factory management.

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. Companies can agree on additional commitments that are required to mitigate risks. K.O.I is encouraged to schedule more audits as a way of assessing risks, especially in countries with high risks such as India and Turkey.

**Comment:** K.O.I. makes use of the FWF risk assessment for Italy and the guidelines on Syrian refugees for Turkey. K.O.I. forwarded the letter of FWF about Syrian refugees to their Turkish supplier and visited the workplace.

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: In 2015 K.O.I. shared a production location with another FWF member where an audit took place . They contacted this member several times to share information.

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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Requirement: Just as suppliers in high risk countries, suppliers in low risk countries should return the completed CoLP questionnaire before production orders are placed.

Comment: New suppliers were informed immediately about FWF. Except for one supplier, all suppliers in low risk countries have been visited. The workers information sheets have been posted in the workplaces.

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: 19

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### 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:** The member company must ensure that the Worker Information Sheet, including contact information of the local complaints handler of FWF, is posted in all factories, in both high and low risk countries, in a location that is accessible to all workers. The member company should check by means of a visit whether the Worker Information Sheet is posted in the factories. If the member does not visit the factory, the agent can be asked to do this.

**Comment:** Visiting K.O.I. staff is informed to check the posting of the Worker Information Sheets in high risk countries, and to make pictures of this.

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 member company should have a routine to ensure the worker information sheet with complaints handlers contact details is posted in a place freely accessible to workers. The information sheet is the first step towards awareness raising about the existence and functioning of FWFs worker hotline.

**Recommendation:** The member company can stimulate its suppliers to participate in WEP trainings, to raise awareness about the existence and the functioning of FWF's worker hotline. In addition to sending the worker information sheet, member companies can use the worker information cards available for download on FWF's website.

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

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## 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 weekly internal meetings, and staff that visits suppliers has separate meetings with the CSR manager. 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.	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: K.O.I. participated in the new members seminar and in the webinars that were offered.

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: Agents can be more involved to actively support the implementation of the CoLP, by checking on progress of the CAP, and making pictures to prove remediation. In some cases agents might have more leverage than K.O.I., because they represent more clients of the factory. Their active involvement would help the implementation of the CoLP. FWF could give a training to K.O.I.'s agents to increase their support.

Comment: K.O.I. works with three agents in India, Turkey, and Greece, all of them are informed about FWF's CoLP.

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. This programme is offered in FWF's priority countries. The member company should motivate its main supplier(s) to join official FWF WEP trainings where possible.

Comment: K.O.I. has not organized any FWF WEPs for their suppliers yet. Two suppliers in Tunisia received a training on the CoLP, but these were not organized by FWF, nor is it clear whether the training meets FWF quality standards.

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 and the process of monitoring and remediation. In order to further communication between employers and workers in the workplace FWF recommends member companies to ensure suppliers participate in trainings. 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.

Comment: Except for the two trainings in Tunisia, K.O.I. has not organized any training for other suppliers in countries where a WEP is not offered.

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## TRAINING AND CAPACITY BUILDING

Possible Points: 15

Earned Points: 4

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## 5. INFORMATION MANAGEMENT

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
5.1 Level of effort to identify all production locations	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:** Member companies are advised to develop a systematic approach to complete the supplier list. Part of the approach can be:

- 1) automatically include information from audit reports
- 2) Business relationships with agents include transparency of production locations.
- 3) Agreements with all factories on the use of subcontractors stating clearly that when subcontractors are used, they are included in the monitoring system and information is shared on the subcontracted production process.

The supplier register of the previous financial year has to be complete and accurate; production locations of all suppliers must be listed, including subcontractors.

Correct FOB percentages should be given per supplier to show the relevance of each supplier in relation to the member company's total purchasing volume.

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

During visits K.O.I. checks whether their products they expect to be made because of the production date are actually being processed in the production lines.

One subcontractor in Tunisia was not entered in the database yet.

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 advised to make relevant staff aware of the available tools FWF offers, such as the Health and Safety guides, monitoring CAP documents and access to FWF's online information system. Purchasing staff is recommended to share reports from factory visits that include a status update of implementing the CoLP.

**Comment:** Within K.O.I. all staff involved with suppliers are in the same team and regularly share information. When a staff member visits a supplier, the CSR manager will discuss the relevant documents and explain how they can be used during the visits.

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## 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
6.2 Affiliate engages in advanced reporting activities	Yes	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.	1	1	0

Comment: Because of the earlier suspended status K.O.I. was not allowed to communicate about FWF in 2015. K.O.I. is looking into the possibility to train the sales agents on their FWF membership in 2016. K.O.I. sent an open letter to their German clients explaining the reasons behind their suspended status, which was checked by FWF.

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: The Social report has been sent to FWF and published on the website.

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## TRANSPARENCY

Possible Points: 4

Earned Points: 4

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## 7. EVALUATION

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
7.1 Systemic annual evaluation of FWF membership is conducted with involvement of top management	Yes	An annual evaluation involving top management ensures that 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.

7.2 Changes from previous Brand Performance Check implemented by affiliate	3%	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: K.O.I. has resolved 3 of the 8 requirements of the last brand performance check. These requirements were related to indicators 1.4, 1.5 and 2.5.

## EVALUATION

Possible Points: 6

Earned Points: 4

## RECOMMENDATIONS TO FWF

K.O.I. recommends FWF to 1; make relevant documents easier accessible for member companies, 2; offer more concrete guidance on what is expected of them and 3; organize a yearly stakeholder meeting for all Dutch members to exchange experiences and best practices.

## SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	25	40
Monitoring and Remediation	19	29
Complaints Handling	-1	7
Training and Capacity Building	4	15
Information Management	4	7
Transparency	4	4
Evaluation	4	6
Totals:	59	108

### BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

55

### PERFORMANCE BENCHMARKING CATEGORY

Good: 55

## BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

02-02-2016

Conducted by:

Niki Janssen

Interviews with:

Tony Tonnaer (CEO)

Kirsten Zwart (Sourcing and CSR 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.