



## BRAND PERFORMANCE CHECK

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ROOTS for Safety B.V.

PUBLICATION DATE: NOVEMBER 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](http://www.fairwear.org). The online [Brand Performance Check Guide](#) provides more information about the indicators.

## BRAND PERFORMANCE CHECK OVERVIEW

ROOTS for Safety B.V.

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

AFFILIATE INFORMATION	
Headquarters:	Hoogvliet, Netherlands
Member since:	01-07-2013
Product types:	Workwear
Production in countries where FWF is active:	China
Production in other countries:	Italy, Poland
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	43%
Benchmarking score	40
Category	Needs Improvement

## Summary:

Roots for Safety has shown insufficient progress in implementing FWFs management system requirements. With a monitoring percentage of 43%, it does not meet FWF's required monitoring threshold of 60% for members in their second year of membership. Its score of 40 does meet the minimum required score of 40 for members in their second year of membership.

In 2014, Roots for Safety ensured that two of its most important suppliers were audited, and WEP training sessions were also conducted at two of its most important suppliers in China. These actions have set the foundation for Roots for Safety to make real progress on improving working conditions. A third production location, however, was not audited, which had a significant impact on the monitoring percentage.

The important work of remediating Corrective Action Plans was only done to a limited extent in 2014. This will need to improve in 2015, and can be helped along by more involving its agent located in China more in this process. In addition to this, the previous Brand Performance Check contained a large number of required changes (10), but follow-up was only given to three of these changes, while the rest was not addressed.

FWF encourages Roots for Safety to work on attaining the monitoring threshold, CAP remediation and addressing the required changes related to setting up a system to monitor social compliance, the posting of Worker Information Sheets and addressing more challenging issues such as overtime and wage levels.

## 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	99%	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: Roots for Safety has a relatively high leverage at its suppliers.

1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years	0%	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.	0	4	0
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Recommendation: FWF recommends Roots for Safety to maintain stable business relationships with suppliers. Long-term relationships support most aspects of the Code of Labour Practices, and give factories a reason to invest in improving working conditions.

Comment: Roots for Safety currently does not have a business relationship with any of its suppliers for more than five years.

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: Roots for Safety needs to ensure that new suppliers sign and return the questionnaire before first orders are placed.

Comment: Roots started shoe production at a factory in Italy. The supplier signed the Code of Labour Practices before the first orders were placed. Roots for Safety also started production at a production location in China, but the Code of Labour Practices was not signed there.

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:** FWF recommends Roots to request the existing audit report in order to further assess the working conditions.

**Comment:** Roots for Safety completed the Health & Safety checklist during the factory visit in Italy and this checklist indicated that there did not seem to be any immediate problems. The questionnaire indicated that the factory had received a social audit recently, but this report has not (yet) been requested.

For the factory in China, there did not seem to be any human rights due diligence.

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 Roots for Safety consistently evaluates the entire supplier base and includes information into decision-making procedures.

**Comment:** There is currently no systematic evaluation of supplier compliance with Code of Labour Practices.

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:** Roots works to make the production planning process as smooth as possible for the production locations. A relatively large buffer stock is maintained to allow on-time delivery and avoid rush orders as much as possible. The production flow starts with forecasting: forecasting is based upon historical sales figures and Roots maintains a lead time of 4 months for the standard collection. This relatively short lead time is made possible as significant fabric stock is maintained at the factory, eliminating the time needed for the arrival of fabrics. Special orders have a lead time of 6 months.

Two years ago, Roots rolled out forecasting software to more accurately predict upcoming orders and also introduced software that better tracks the production process. This allows Roots to better anticipate potential production and delivery delays, as the number of products available in the warehouse are kept track of on a realtime basis. The system provides trend and other forecasting capabilities, allowing reorders to be placed much earlier than before, when production decisions were made later and with less information.

In 2014, Roots designated a number of items 'Never out of stock', meaning that a higher amount of products are kept in stock. This also should reduce the production pressure.

When a new order is placed, the agent in China determines at what production locations the orders will be produced. In there is a special order with a tight deadline, Roots for Safety determines on a case-by-case basis if and how the production will take place, depending on what impact this has on the current production schedule. It sometimes still means that rush orders at times place pressure on the suppliers' ability to deliver garments according to the determined schedule.



1.7 Degree to which affiliate mitigates root causes of excessive overtime.	Insufficient efforts	Some production delays are outside of the control of affiliates; however there are a number of steps that can be taken to address production delays without resorting to excessive overtime.	Documentation of root cause analysis and positive steps taken to manage production delays or improve factory processes.	0	6	0
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**Requirement:** Roots for Safety should investigate to what extent its current buying practices has an effect on the working hours at supplier level. A root cause analysis of excessive overtime should be done to investigate which steps can be most effective to reduce overtime.

**Comment:** In 2014, Roots for Safety did not undertake any activities to investigate and then mitigate the root causes of excessive overtime, even though audits at two production locations in China did indicate excessive overtime.

Its recent production planning system as described in 1.6 currently does not consider issues like working hours for the production workers.

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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**Requirement:** Roots for Safety needs to develop a pricing policy where the affiliate knows the labour cost of garments and which allows the payment of at least legal minimum wages in production countries.

**Comment:** No significant progress has been booked on this area in 2014. Pricing discussions are done by Roots' agent in China, who is aware of wage levels in China and the value of CMT within the pricing of individual products. Audits for two factories located in China show that legal minimum wages were being 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
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.	Factory-level approach	Sustained progress towards living wages requires adjustments to affiliates' policies.	Documentation of policy assessments and/or concrete progress towards living wages.	4	8	0

**Recommendation:** FWF recommends Roots for Safety to monitor the wage levels of the factory to see if the investment in new machinery has actually led to increased efficiency and worker income.

**Comment:** For one of Roots for Safety's factories in China, Roots for Safety co-funded an investment in new machinery with the intention of allowing workers to work more efficiently. By working more efficiently, workers potentially can increase production and therefore earn more income. The effects of this investment have not yet been able to be verified independently by FWF or another organisation.

1.12 Affiliate sources from an FWF factory member.	Yes	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.	1	1	0
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Comment: Roots for Safety sources from a FWF factory member.

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: 41

Earned Points: 17

## 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	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	43%	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	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

**Requirement:** Resolving and remediating non-compliances is one of the most important criteria FWF affiliates can do towards improving working conditions. FWF expects Roots for Safety to examine and support remediation of any problems that it encounters. Coordinated efforts between different departments are required to ensure sustained responses to CAPs.

**Recommendation:** Roots for Safety is recommended to make more use of its agent located in China in its remediation efforts.

**Comment:** In 2014, Roots for Safety audited its two main production facilities accounting for more than 98% of production. The audit at one factory showed that there had been some improvements since the previous audit. For the other audit, the findings were discussed with management. However, there was a lack of documentation of the remediation of both audit reports and Corrective Action Plans. This needs to be addressed in 2015.

2.3 Percentage of production volume from suppliers that have been visited by the affiliate in the past financial year	99%	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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**Comment:** Roots for Safety's agent and QC staff visited all production locations in China regularly in 2014.

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.

**Comment:** Roots for Safety was aware of another audit conducted at its location in Italy, but did not collect the audit 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: The audit reports were shared in a timely manner with both factories.

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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**Requirement:** Roots for Safety's monitoring system should identify and address high risk issues that are specific to the affiliates' sourcing practices. FWF provides policies and country-specific requirements to affiliates. Priorities in remediation efforts are guided by these policies.

**Recommendation:** Knowing the country specific risks facilitates the starting point for discussing this with suppliers. Roots for Safety can agree on additional commitments that are required to mitigate risks. The affiliate can provide additional measures for support and integrate that in the monitoring system.

**Comment:** In 2014, Roots for Safety did not undertake efforts to identify and address high risk issues related to its supply chain.

Roots for Safety has made a deliberate choice in sourcing only from China and staying with its suppliers for a relatively long period of time. This means that it has chosen not to source from other countries that it is less familiar with.

Similar to last year, Roots for Safety does not have a structured system in place yet to identify and mitigate high risk issues specific to the country of China.

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	No cooperation	Cooperation between customers increases leverage and chances of successful outcomes. Cooperation also reduces the chances 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

**Recommendation:** Cooperation among customers increases leverage, the chances of successful outcomes and long term improvements. A first step can be identifying other clients and their commitment to improving working conditions.

**Comment:** There was no cooperation with the other FWF affiliate in following up one audit that took place in 2014.

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 in order for it to be counted towards the monitoring threshold. All production sites in low-risk countries must:

- 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.

Comment: Code of Labour Practices was not yet posted in the factory located in Italy.

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: 5

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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:** Roots for Safety must ensure that the Worker Information Sheet, including contact information of the local complaints handler of FWF, is posted in factories in a location that is accessible to all workers. Affiliate should check by means of a visit whether the Worker Information Sheet is posted in the factories.

**Comment:** Roots for Safety currently does not have a system in place to check if the Worker Information Sheet is posted.

3.3 Percentage of FWF-audited factories where at least half of workers are aware of the FWF worker helpline.	50%	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:** Roots for Safety 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, affiliates can use the worker information cards available for download on FWF's website.

**Comment:** In 2014, Roots for Safety organised a WEP training session at its most important factory in China. This accounted for 50% of its factories that were either audited or trained in 2014.

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

Possible Points: 7

Earned Points: 4

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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
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

**Recommendation:** FWF encourages purchasing staff to observe factory audits by FWF audit teams to learn about the audit process and to be able to better follow up on corrective action plans.

**Comment:** Roots for Safety did not undertake efforts to ensure that relevant staff were aware of FWF requirements and could assist in CAP remediation.

4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices.	Yes + actively support COLP	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.	2	2	-2
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**Requirement:** FWF affiliate needs to ensure agents are aware of FWF requirements and actively support the implementation of the CoLP.

**Comment:** Roots for Safety's agent is aware of FWF membership and has undertaken some efforts in terms of CAP remediation.

4.4 Factory participation in Workplace Education Programme (where WEP is offered; by production volume)	100%	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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Comment: Roots for Safety organized a WEP training session at its factories in China accounting for more than 50% of its production volume there.

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: 11

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	Insufficient	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.	-2	6	-2

**Recommendation:** Roots for Safety is advised to develop a systematic approach to complete the supplier list. Part of the approach can be:

- 1) automatically include information from audit reports and complaints
- 2) Business relationships with agents include transparency of production locations.
- 3) Agreements with 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.

**Comment:** During factory audits, subcontracting locations used in 2014 were noted. Another production location was discovered after discussions with the brand as part of the Brand Performance Check. These production locations were not yet included in the database.

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: Roots for Safety has a server that allows all relevant staff access to audit reports, etc.

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## INFORMATION MANAGEMENT

Possible Points: 7

Earned Points: -1

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## 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

Comment: In 2014, Roots for Safety communicated its FWF membership in emails and on its website, adhering to FWF's communications policy.

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
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Comment: The Brand Performance Check 2014 is published on the Roots for Safety 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: Roots for Safety has submitted a complete Social Report for 2014.

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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: Roots for Safety discusses FWF with its top management levels on a regular basis.

7.2 Changes from previous Brand Performance Check implemented by affiliate	20%	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:** It is required to work towards remediation of previous requirements from the last Brand Performance Check. Further engagement needs to be taken with regard to the following requirements mentioned in the last Brand Performance Check.

**Comment:** In the previous Brand Performance Check, Roots for Safety had 10 requirements. In 2014, it followed up on 3 of these requirements:

- making sure that new suppliers signed the FWF questionnaire;
- conducting due diligence at new suppliers;
- ensure that its agent working in China actively helped with FWF requirements and CAP remediation.

It did not, however, implement changes related to the following 8 requirements:

- evaluating supplier compliance in a systematic manner;
  - analyse the root causes of overtime at its audited production locations in China;
  - linking its pricing policy to ensuring legal minimum wages;
  - analyse the root causes of wages being below living wage estimates;
  - address high risk issues related to China in its supply chain;
  - ensure that suppliers located in low-risk countries were monitored according to FWF guidelines;
  - have a system in place to ensure that the Worker Information Sheets were posted in all production locations.
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## EVALUATION

Possible Points: 6

Earned Points: 4

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## RECOMMENDATIONS TO FWF

N/A

## SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	17	41
Monitoring and Remediation	5	29
Complaints Handling	4	7
Training and Capacity Building	9	11
Information Management	-1	7
Transparency	4	4
Evaluation	4	6
Totals:	42	105

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

40

### PERFORMANCE BENCHMARKING CATEGORY

Needs Improvement

## BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

12-05-2015

Conducted by:

Kees Gootjes

Interviews with:

Marco Kremers, Corporate Social Responsibility (CSR) Manager

Paul van der Stap, Purchasing

Jean-Pierre Tabruyn, China Agent

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.