



BRAND PERFORMANCE CHECK

SOLO INVEST S.A.S

PUBLICATION DATE: JULY 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

SOLO INVEST S.A.S

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

AFFILIATE INFORMATION	
Headquarters:	Paris, France
Member since:	01-06-2014
Product types:	Promotional
Production in countries where FWF is active:	Bangladesh, China, India
Production in other countries:	Pakistan
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	27%
Benchmarking score	54
Category	Good

Summary:

Sol's met most of FWF's management system requirements to improve working conditions. In 2014 Sol's monitored 27% of its total purchasing volume, which is below the 40% required of brands in its first year of membership. However, in light of the fact that Sol's only became a member of Fair Wear in June 2014, and therefore had less time to make necessary arrangements, and the fact that a number of audits are planned that expect to bring its monitoring percentage above 60% in 2015, FWF has used its discretionary power and awarded a good rating.

Sol's systematically works towards resolution of corrective actions in all countries and follow up is being closely monitored and documented. High leverage and stable relationships with its suppliers gives Sol's a strong basis for effectively monitoring working conditions.

In 2014 FWF audited two of Sol's suppliers in Bangladesh, which revealed excessive overtime and payment below living wages. Sol's can take steps towards analysing the root causes of excessive overtime and payment below living wages and how this relates to its own buying practices. Moreover, it can encourage more suppliers to take part in FWF's Workplace Education Programme.

PERFORMANCE CATEGORY OVERVIEW

Leader: This category is for affiliates who are doing exceptionally well, and are operating at an advanced level. Leaders show best practices in complex areas such as living wages and freedom of association.

Good: It is FWF's belief that affiliates who are making a serious effort to implement the Code of Labour Practices—the vast majority of FWF affiliates—are 'doing good' and deserve to be recognized as such. They are also doing more than the average clothing company, and have allowed their internal processes to be examined and publicly reported on by an independent NGO. The majority of affiliates will receive a 'Good' rating.

Needs Improvement: Affiliates are most likely to find themselves in this category when major unexpected problems have arisen, or if they are unable or unwilling to seriously work towards CoLP implementation. Affiliates may be in this category for one year only after which they should either move up to Good, or will be moved to suspended.

Suspended: Affiliates who either fail to meet one of the Basic Requirements, have had major internal changes which means membership must be put on hold for a maximum of one year, or have been in Needs Improvement for more than one year. Affiliates may remain in this category for one year maximum, after which termination proceedings will come into force.

Categories are calculated based on a combination of benchmarking score and the percentage of own production under monitoring. The specific requirements for each category are outlined in the Brand Performance Check Guide.

1. PURCHASING PRACTICES

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.1 Percentage of production volume from suppliers where affiliate buys at least 10% of production capacity	86%	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: In 2014, 86% of its FOB volume originated from suppliers where Sol's accounts for more than 10% of the production capacity. For a total of 68% of Sol's 2014 FOB volume, it even accounts for more than 85% of suppliers' production capacity. Sol's therefore has high leverage at these suppliers.

1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years	75%	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.	4	4	0
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Comment: Sol's has established long-term relations with suppliers accounting for 75% of its FOB volume. It favours limiting the number of suppliers per product line. At the same time, Sol's also need to diversify its suppliers to diversify its product range, mitigate risk, ensure sufficient stock and avoid shortage.

1.3 All new suppliers are required to sign and return the Code of Labour Practices before first orders are placed.	Yes	The CoLP is the foundation of all work between factories and brands, and the first step in developing a commitment to improvements.	Signed CoLPs are on file.	2	2	0
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Comment: After joining Fair Wear in June 2014, Sol's informed all its existing suppliers about FWF membership and its Code of Labour Practices. If a manufacturer does not accept the FWF standards, Sol's will not start working with the factory or discontinue placing orders. All suppliers, however, signed and returned the FWF questionnaire. Sol's also asked all suppliers to post the FWF COLP in visible places in the factories and inform workers about FWF and the helpline. Sol's requests its suppliers to send pictures of the posted CoLP, which is also verified during visits to suppliers concerned.

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: Conducting pre-audits by FWF or analysing existing audit reports can be a way to assess the level of working conditions before deciding to start or continue the business relationship.

Comment: Sol's always requests environmental/social certificates and existing audits reports from potential new suppliers. When no audit reports are available, Sol's asks SGS to conduct a GAP Assessment, which gives information especially on OSH issues. Sol's reviews the audit reports and raises any non-compliance issues with the suppliers. Furthermore, Sol's sourcing team/buyers/managers always visit potential new suppliers before starting any collaboration. A visual inspection is done to detect possible child labour, and the FWF questionnaire is used to check and document OSH issues in the facility. In addition, Sol's discusses with the management whether workers have written contracts and minimum wages are respected.

In 2014, visits of Sol's sourcing staff to some new factories revealed important non-compliance issues (child labour) and it was decided not to place any order despite the fact that the factory held certifications, was quite reputed and offered an attractive price.

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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Recommendation: Sol's is encouraged to develop an evaluation/grading system for suppliers where compliance with labour standards is a criterion for future order placement. Part of the system can be to create an incentive for rewarding suppliers for realised improvements in working conditions.

Comment: Last year Sol's started to develop a scoring tool in order to rank suppliers' capacity to deliver on time. The tool is not yet finalized.

1.6 The affiliate's production planning systems support reasonable working hours.	General or ad-hoc system.	Affiliate production planning systems can have a significant impact on the levels of excessive overtime at factories.	Documentation of robust planning systems.	2	4	0
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Recommendation: It is advised to establish a system for sharing and updating forecasts with suppliers to facilitate their planning. The system may include assurance of early delivery of materials and trimmings to suppliers, ensuring samples are approved in time and that late changes are discussed with the supplier. A good production planning system needs to be established based on the production capacity of the factory for regular working hours.

Comment: Sol's develops one collection a year. Manufacturers are informed about the potential annual volume of orders when starting the development of samples. New products stay in the catalogue for four years and generally result in stable orders per year. Lead times from purchase order to shipping range between 60 to 120 days.

Some clients order Sol's products for specific events, so the respect of delivery dates by suppliers is vital. Collaboration with some suppliers was stopped as they could not meet delivery deadlines.

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: The affiliate 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.

Recommendation: As excessive overtime was found at suppliers of Sol's in Bangladesh, it could discuss with factory management on the causes of excessive overtime and provide support to manage overtime. If necessary, Sol's could hire local experts to analyse root cause of excessive overtime in cooperation with the supplier. FWF could recommend qualified persons upon request. This could be combined with a root cause analysis on living wages, which is closely linked to excessive overtime. Sol's could first start supporting factories where it has a higher leverage (buying more than 10% of the production capacity).

Comment: FWF audits conducted in 2014 found excessive overtime at Sol's suppliers in Bangladesh. Audits also found that workers did not enjoy one day off during a seven-day period.

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: At a minimum, Sol's is recommended to investigate wage levels in production countries, among others by making use of FWFs Wage Ladder and country studies. As an advanced step, increased transparency in costing and productivity gives insight in the labour costs per product. This forms the basis for ensuring enough is paid to cover at least minimum wage and for making steps towards living wages.

Comment: With most of its stable and long-term suppliers, Sol's is practicing open-book costing to optimize the costs (fabric consumption, dyeing, CM, accessories, etc). When prices of cotton go up, or labour costs increase, this will lead to adjustments of the FOB prices. When the minimum wages in Bangladesh were raised end of 2013, the FOB prices were adjusted accordingly. However, the labour costs, and worker output data, are not known as suppliers are reluctant to share information on wages and profit margins.

1.9 Affiliate actively responds if suppliers fail to pay legal minimum wages.	Yes	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.	1	2	-2
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Comment: A FWF audit at one of Sol's suppliers revealed that security guards and cleaners were earning below minimum wages. Sol's raised this issue with the supplier, which subsequently raised wages concerned.

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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Requirement: Sol's 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.

Recommendation: Because of the open costing system, Sol's is able to identify the payment of the cut-make (CM) process, which is most labour intensive. When Sol's is able to investigate further and determine more precisely the labour costs for its products, it should have a better understanding whether its FOB prices support payment of living wages. This could be the basis for discussion with management at suppliers where Sol's has high leverage, to encourage and support them further to move towards payment of living wages.

Comment: In 2014 Sol's used FWF's wage ladders from audit reports to discuss with one of its suppliers in Bangladesh on living wages. Sol's intends to discuss the impact of living wages on overtime, staff motivation and retention, and productivity.

1.12 Affiliate sources from an FWF factory member.	No	When possible, FWF encourages affiliates to source from FWF factory members. On account of the small number of factories this is a 'bonus' indicator. Extra points are possible, but the indicator will not negatively affect an affiliate's score.	Supplier information provided by affiliate.	N/A	1	0
1.13 Percentage of production volume from factories owned by the affiliate.	None	Owning a supplier increases the accountability and reduces the risk of unexpected CoLP violations. Given these advantages, this is a bonus indicator. Extra points are possible, but the indicator will not negatively affect an affiliate's score.	Supplier information provided by affiliate.	N/A	2	0

PURCHASING PRACTICES

Possible Points: 40

Earned Points: 21

2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	27%	
% 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	27%	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	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

Recommendation: To facilitate remediation, Sol's could consider:

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

Comment: Sol's keeps track of progress on all CAPs from audits, including FWF audits and audits by other initiatives (e.g. SEDEX, BSCI, WRAP). In Bangladesh, Sol's local staff sometimes visits the factories to follow up the CAPs. In other countries, the CSR staff in headquarter office maintains frequent contacts with factories to raise awareness, discuss implementation and encourage factories to make improvements. An internal follow up table is maintained to document the latest audits' results for each factory and CAP evolution. Before any visit to the supplier, the CSR Manager briefs the visiting colleague concerned about the current situation and the pending issues that need to be addressed. Documentation was shown of follow up actions taken by Sol's in 2014; documents and pictures are filed in the CAP and the status is monitored during visits. Sol's suppliers had made significant improvements on occupational health and safety and other issues, but issues regarding overtime and wages are more complicated and require more time.

2.3 Percentage of production volume from suppliers that have been visited by the affiliate in the past financial year	50%	Formal audits should be augmented by annual visits by affiliate staff or local representatives. They reinforce to factory managers that affiliates are serious about implementing the Code of Labour Practices.	Affiliates should document all factory visits with at least the date and name of the visitor.	3	4	0
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Recommendation: Annual visits should be made for production sites (including subcontractors and production locations in low-risk countries). Regular visits provide the opportunities to discuss problems and corrective actions in the time period between formal audits.

2.4 Existing audit reports from other sources are collected.	Yes, quality assessed and corrective actions implemented	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.	3	3	0
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Comment: Sol's consistently requests existing and new suppliers to share third-party audit reports (e.g. NUK, WRAP, Accord, BSCI, etc.). Sol's demonstrated follow-up on such reports, e.g. a WRAP audit in Pakistan, as well as safety inspection reports from the Accord in Bangladesh.

2.5 Audit Report and Corrective Action Plan (CAP) findings are shared with factory. Improvement timelines are established in a timely manner	Yes	2 part indicator: FWF audit reports were shared and discussed with suppliers within two months of audit receipt AND a reasonable time frame was specified for resolving findings.	Corrective Action Plans, emails; findings of followup audits; brand representative present during audit exit meeting, etc.	2	2	-1
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Comment: Upon receipt of an audit report, Sol's consults the factory to make sure the CAPs and timeframes are workable.

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. Sol's is advised to take note of Fair Wear country reports and specific issue papers that describe specific risks in countries where Sol's is active (e.g. Sumangali in India and gender-based violence in India and Bangladesh). Sol's can agree on additional commitments that are required to mitigate risks. Sol's can provide additional measures for support and integrate that in the monitoring system.

Comment: Sol's is aware of specific issues high risk issues in countries where it sources.

2.6a High risk issues specific to Bangladesh are identified and addressed by the monitoring system and remediation activities.	Intermediate Capacity	Affiliates sourcing in Bangladesh should take additional action to address both building and fire safety and the prevention of violence against women.	Building, electrical and fire safety inspection reports, evidence of cooperation with other customers sourcing at the same factories (Accord signatories and/or FWF affiliates), etc.	1	3	0
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Comment: Even though Sol's did not sign the Accord, it follows up on CAPs that follow from the Accord's inspections. In 2015 it enrolled some of its suppliers in FWF's workshop on safety principles. It has also started to enroll some of its (larger) suppliers in Bangladesh in FWF's workplace education programme to mitigate the risk of harassment at work and to strengthen awareness on the FWF grievance procedure and helpline.

2.6b High risk issues specific to Myanmar are identified and addressed by the monitoring system and remediation activities.	Not sourcing in Myanmar	Myanmar is still in the process of establishing the legal and civil society infrastructure needed to ensure compliance with labour rights. Extra care must be taken when doing business in Myanmar.	Shared CAPs, Wage Ladders per factory.	N/A	3	0
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2.7 Affiliate cooperates with other customers in resolving corrective actions at shared suppliers	No CAPs active or no shared suppliers.	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.	N/A	2	-1
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Comment: Sol's has shown an openness and willingness to share audit reports and follow-up on CAPs jointly at shared suppliers.

2.8 Monitoring requirements are fulfilled for production in low-risk countries	No production in lowrisk countries	Low risk countries are determined by the presence and proper functioning of institutions which can guarantee compliance with basic standards.	Documentation of visits, notification of suppliers of FWF membership; posting of worker information sheets, completed questionnaires.	N/A	2	0
2.9 External brands resold by the affiliate who have completed and returned the external brand questionnaire. (% of external sales volume)	No external brands resold	FWF believes it is important for affiliates that have a retail/wholesale arm to at least know if the brands they resell are members of FWF or a similar organisation, and in which countries those brands produce goods.	Questionnaires are on file.	N/A	3	0
2.10 External brands resold by affiliates that are members of another credible initiative. (% of external sales volume)	No external brands resold	FWF believes affiliates who resell products should be rewarded for choosing to stock external brands who also take their supply chain responsibilities seriously.	External production data in FWF's information management system. Documentation of sales volumes of products made by FWF or FLA members.	N/A	3	0

MONITORING AND REMEDIATION

Possible Points: 28

Earned Points: 18

3. COMPLAINTS HANDLING

BASIC MEASUREMENTS	RESULT	COMMENTS
Number of worker complaints received since last check	0	At this point, FWF considers a high number of complaints as a positive indicator, as it shows that workers are aware of and making use of the complaints system.
Number of worker complaints in process of being resolved	0	
Number of worker complaints resolved since last check	0	

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.1 A specific employee has been designated to address worker complaints	Yes	Followup is a serious part of FWF membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	1	1	-1
3.2 System exists to check that the Worker Information Sheet is posted in factories	Yes	The Worker Information Sheet is a key first step in alerting workers to their rights.	Photos by company staff, audit reports, checklists from factory visits, etc.	2	2	0

Comment: Whenever Sol's staff are travelling to visit factories, posting of the Worker Information Sheet is always verified. Pictures are collected and kept on file.

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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Recommendation: Sol's 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, Sol's can use the worker information cards available for download on FWF's website. Sol's is furthermore advised to encourage and support its suppliers to organize awareness raising programmes on the FWF CoLP and helpline.

Comment: The workers interviewed during 2 FWF audits in 2014 conducted at Sol's suppliers in Bangladesh were not aware of the FWF worker helpline or the Code of Labour Practices.

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: Sol's CSR manager explained Fair Wear membership requirements to all the different departments in Sol's.

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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Recommendation: FWF encourages purchasing staff or agents 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: Sol's CSR manager delivered a presentation to staff in direct contact with suppliers on FWF's Code of Labour Practices. During monthly meetings, the CSR manager raises the status of CAPs for relevant suppliers with staff responsible for sourcing, buying, product development and production and a course of action is determined to address outstanding issues at suppliers concerned.

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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Comment: Sol's works with agents when the factory management does not speak English (in China most of the time) and when its volume of order is too low. In the latter case, agents may have better access to compliant factories due to the agency total order volume. When working via agents, Sol's demands total transparency. Sol's informed agents of FWF's Code of Labour Practices.

4.4 Factory participation in Workplace Education Programme (where WEP is offered; by production volume)	3%	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.	1	6	0
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Recommendation: In order to ensure awareness and enhance understanding of the relevant labour standards, grievance mechanisms and the importance of a good mechanism for communication between employers and workers in the workplace, FWF developed the Workplace Education Programme. This programme is offered in the 4 priority countries, including Bangladesh, India and China. Sol's should motivate its main supplier(s) to join WEP trainings.

Comment: In 2014 Sol's did not enroll any of its suppliers in Fair Wear's Workplace Education Programme. In 2015, however, Sol's has started to enroll some of its suppliers in China and Bangladesh.

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 Sol's 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: Almost all of Sol's s production is Bangladesh, China and India where WEP is offered. Sol's has one supplier in Pakistan, accounting for 5% of Sol's s total 2014 FOB purchasing volume.

TRAINING AND CAPACITY BUILDING

Possible Points: 15

Earned Points: 5

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

Requirement: After the end of each financial year, Sol's must confirm their list of suppliers and provide relevant financial data. A complete suppliers list means ALL suppliers are included

Recommendation: 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 affiliate's total purchasing volume. These can be calculated on the basis of payments made during the previous financial year.

Comment: Sol's does not allow its suppliers to use subcontractors. It verifies this through factory visits by HQ staff and local office in Bangladesh, during which time it carefully monitors progress vis-a-vis the the production schedule, e.g. dates availability of yarn, knitting, 10% of CM, 50% of CM, shipping, etc. In countries where Sol's does not have a local office (China, India, Pakistan) it is more difficult to conduct frequent visits.

Sol's main supplier in Bangladesh, accounting for almost 60% of its 2014 purchasing volume, consists of seven different production facilities. For 2014, an estimation of FOB volume per production location was made.

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: During monthly meetings, the CSR manager discusses the status of CAPs for relevant suppliers with staff responsible for sourcing, buying, product development and production and a course of action is determined to address outstanding issues at suppliers concerned.

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

Comment: Sol's communicates about FWF through the company website and the company catalogue. Membership is described in correct wording.

Sol's intends to integrate information about Fair Wear affiliation in its global communications and communicate about FWF membership to its customers.

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

6.3 Social Report is submitted to FWF and is published on affiliate's website	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
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Requirement: FWF approach requires transparency on affiliates work towards social standards. The social report needs to be submitted to FWF and published on Sol's website.

Comment: Sol's submitted the social report to FWF, but did not publish it on its website.

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: During Sol's previous annual meeting, Fair Wear membership was announced and discussed.

7.2 Changes from previous Brand Performance Check implemented by affiliate	No requirements were included in previous Check	In each Brand Performance Check report, FWF may include requirements for changes to management practices. Progress on achieving these requirements is an important part of FWF membership and its process approach.	Affiliate should show documentation related to the specific requirements made in the previous Brand Performance Check.	N/A	4	-2
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Comment: As Sol's joined FWF in June 2014, no previous brand performance checks were conducted.

EVALUATION

Possible Points: 2

Earned Points: 2

RECOMMENDATIONS TO FWF

N/A

SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	21	40
Monitoring and Remediation	18	28
Complaints Handling	1	7
Training and Capacity Building	5	15
Information Management	7	7
Transparency	2	4
Evaluation	2	2
Totals:	56	103

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

54

PERFORMANCE BENCHMARKING CATEGORY

Good

BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

05-06-2015

Conducted by:

Koen Oosterom

Interviews with:

Ms. Alexandra BOURDERYE, Buyer

Mr LE MEUR, Purchase Manager

Mr BONCORPS, Sales Manager

Mr BRISSEAU Sourcing team

Mr OSTROWSKY, General Director

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.