



BRAND PERFORMANCE CHECK

SOLO INVEST S.A.S

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. The online [Brand Performance Check Guide](#) provides more information about the indicators.

BRAND PERFORMANCE CHECK OVERVIEW

SOLO INVEST S.A.S

Evaluation Period: 01-01-2015 to 31-12-2015

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	65%
Benchmarking score	62
Category	Good

Summary:

Solo Invest S.A.S (hereafter: Sol's) met most of FWF's management system requirements to improve working conditions at its suppliers. In 2015 Sol's monitored 65% of its total purchasing volume, which is above the 60% required for the second year of FWF membership.

Sol's sourcing practices supports the implementation of the Code of Labour Practices. Sol's determines product prices based on its knowledge on labour minute costing at style level, adjusted to a supplier's unique capacity and efficiency. Lead time and production planning are also discussed with suppliers in advance. Sol's commits to main suppliers on a monthly production volume, which enables suppliers to make proper planning. These systems have been shown to contribute to preventing overtime and ensuring minimum wages at brand level; for example, as a result, audits found that Sol's suppliers in Bangladesh had not engaged in excessive overtime in 2015.

Sol's monitors its suppliers with FWF's audit team. Audit reports are followed up timely. Most issues in the Corrective Action Plans have been discussed with factory management. According to Sol's own monitoring results, remediation on issues such as occupational health and safety risk, incomplete personal data and lack of contracts has been realised.

FWF encourages Sol's to invite more suppliers to take part in the Workplace Education Programme. Sol's could also improve its monitoring process by providing training to agents and local staff on FWF's audit methodology and requirements.

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: Sol's has considerable influence in its main suppliers. Sol's is able to use its leverage to improve labour conditions in those factories.

1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years	65%	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: Sol's maintains long term relationships with majority of its suppliers.

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: Sol's started production at 13 new suppliers in 2015. They are located at Bangladesh, China and India.

All suppliers are required to sign the Code of Labour Practices. It usually takes 6-8 months for Sol's to confirm the starting of business relationship with a new supplier. During that period, Sol's collects production data and requires suppliers' commitment on social compliance.

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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Comment: Sol's visits almost all new factories. Sol's assess a factory's ability based on the organisational structure and management structure, previous experience in compliance, lead time, price and production capacity.

Sol's uses FWF's Occupational Health and Safety checklist to conduct a basic check in new factories. In addition, local staff in Bangladesh conducts workers interviews on site.

Before placing an order, Sol's makes an agreement with the suppliers regarding price structure, lead time and monthly orders based on the needs for production and capacity of the supplier.

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 can set up an evaluation system that fits the needs of the company. Such a system needs to document and evaluate suppliers' compliance status to give an overview on the supplier base. Whenever possible, reward could be given to suppliers that perform better.

Comment: Sol's found it difficult and unfair to compare suppliers of different sizes, capacities, and locations in one single system. Currently Sol's evaluates its suppliers monthly in meetings. There is no formal process and documentation for the evaluation.

1.6 The affiliate's production planning systems support reasonable working hours.	Strong, integrated systems in place.	Affiliate production planning systems can have a significant impact on the levels of excessive overtime at factories.	Documentation of robust planning systems.	4	4	0
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Comment: Sol's production is predictable for all suppliers. Sol's commits to produce a fixed quantity every month at factories where Sol's has at least 70% leverage. The production quantity is negotiated in the beginning of the business relationship and is adjusted annually. The production quantity is a proportion of the suppliers' capacities, which are calculated based on actual production data rather than estimates.

At factories where Sol's does not have a high leverage, Sol's does not have the possibility to offer a fixed production quantity. Sol's makes a commitment to order a monthly amount with a set range.

Sol's provides an overall production plan to suppliers annually, at the same time requests suppliers to provide an overview of their plans. Regarding urgent orders, Sol's and the suppliers agree in advance on several time slots where extra orders are allowed to be placed.

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: Sol's has already taken a number of steps to reduce overtime at the suppliers. In addition to that, Sol's could support factories to conduct a root causes analysis on excessive overtime at supplier level. The causes of excessive overtime are usually multifold. The factories need to set priorities in order to make change gradually.

Comment: FWF audited eight factories supplying Sol's in 2015. At the suppliers where Sol's has higher than 70% leverage, overtime is found to be significantly less than other factories in Bangladesh. A proportion of workers at these factories worked at least 60 hours weekly comparing to 80 hours on average in the country. This could be a result of good production planning mentioned in 1.6.

Excessive overtime is found at the other five factories, where Sol's has a leverage of 30-50%.

At brand level Sol's uses a number of measures to prevent and predict delay which in turn reduce the risk of excessive overtime at the factories. These measures include:

- 1) Communicate weekly on status of fabric availability, progress of cut & made as well as quality check.
- 2) Do not apply fines in case of delay.
- 3) Help suppliers establish a proper system to calculate production capacity.

1.8 Affiliate's pricing policy allows for payment of at least the legal minimum wages in production countries.	Style-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.	4	4	0
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Recommendation: Sol's is encouraged to join FWF's living wage challenge project.

Comment: Sol's uses open costing to negotiate price with the suppliers. In such costing system, standard minute value is used to define the cost of cut & made. The suppliers provide figures on its efficiency and the numbers of employees in the production lines. The data is used to calculate the cost of labour from Sol's perspective.

As Sol's nominates fabric and materials suppliers, Sol's knows the cost of raw materials. The profit margin of the factories is also negotiated in advance.

As a result Sol's is able to demonstrate that its pricing policy allows at least minimum wages. When minimum wages increase, Sol's adapts prices accordingly.

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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Recommendation: As follow up of the CAPs, Sol's should make sure all suppliers have systems to ensure at least minimum wages.

Comment: According to audit findings in 2015, all eight audited suppliers paid minimum wages according to local laws. At two suppliers in China, there are piece rate workers. Their wages are higher than minimum wage but there is no system to guarantee this.

At four factories in Bangladesh, it was found that some workers did not get paid according to their pay grades for work.

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: Sol's is encouraged to conduct a brand level study to find out which practice can support suppliers to increase wages. Sol's could join FWF's living wage challenge project to start a pilot in supporting suppliers towards payment of living wages.

Comment: Sol's is aware of the impact of its price on the wages of workers. Sol's and its suppliers are transparent on costing and pricing. There is an annual meeting to discuss price at top management level. Workers' wages, material costs and other costs are included in the discussions.

Sol's is committed to the payment of living wages in principle. Sol's does discuss living wages with suppliers as part of the Corrective Action Plan follow up of factories audited by FWF.

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: 28

2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	65%	
% 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	65%	Minimums: 1 year: 40%; 2 years 60%; 3 years+: 90% Measured as a percentage of turnover.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.1 Specific staff person is designated to follow up on problems identified by monitoring system	Yes	Followup is a serious part of FWF membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	2	2	-2

Comment: Two staff members in the purchasing department are responsible to follow up on compliance at the suppliers.

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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Recommendation: Sol's should make more effort to inform suppliers on FWF's requirements on wages, overtime, gender and freedom of association. In case an expected outcome of the Corrective Action Plan is not possible to achieve in a short term, Sol's should at least convince the suppliers to commit to the requirement and make a remediation plan towards the goal.

The documentation of the discussions on the Corrective Action Plans should include details in order to understand the current situation and the opinion of the suppliers.

In case there are difficulties in remediation, Sol's could request FWF's local team to provide support. The local team could provide training to factory management as well as to verify the improvements of the factory.

Sol's could invite its suppliers to join various workshops for factory managers organised by FWF regularly.

Comment: Sol's shares the audit report timely and discusses with all suppliers on the corrective action plans. In Bangladesh, the local sourcing office of Sol's discussed with suppliers directly. In other locations, the suppliers or the agents reported to Sol's with pictures and records.

In most cases suppliers could demonstrate the results and their efforts to improve Occupational Health and Safety conditions in the factories. It has been quite difficult for most factories to commit to make improvements on overtime and wages.

2.3 Percentage of production volume from suppliers that have been visited by the affiliate in the past financial year	68%	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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Comment: Sol's visits suppliers at least two times a year.

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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Recommendation: Sol's could use FWF's quality checklist to evaluate audit reports by other initiatives.

Comment: Sol's collected audit reports from other initiatives whenever possible. Sol's also demonstrated its effort to follow up on remediation of these audit reports. In some cases, Sol's also requests other initiatives to conduct audit before production is placed. For factories where Sol's has a high leverage, Sol's usually conducts a FWF audit.

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: Sol's has a system to share and discuss the audit reports with the suppliers timely. Sol's production department discussed the timeline with the factories.

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: Sol's is advised to pay attention to prevent gender based violence and forced labour in the factory in South India. Sol's can request the supplier to participate in FWF's Workplace Education Programme, which focuses on building preventive systems to prevent harassment and violence at work.

Comment: Sol's has focused its work on compliance in Bangladesh. This is because Sol's production is mainly made in Bangladesh and it has higher leverage in the suppliers in Bangladesh.

Sol's is aware of the risks sourcing in high risk countries such as China and India. At the Chinese suppliers, Sol's focuses on supporting suppliers to reduce overtime. Sol's has also discussed with the suppliers in China to join FWF's Workplace Education Programme.

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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Requirement: Sol's should enroll all its suppliers to FWF's fire and building safety workshop. The workshop raises awareness of suppliers on safety and production. It ensures and supports suppliers to use a process approach towards achieving factory safety. For suppliers that are not part of the Accord, Sol's should make sure that they received inspections on fire and building safety. These inspections can be done by the Alliance or ILO certified inspection organisations.

Recommendation: To address gender equality and violence against women, Sol's could suggest its suppliers to join FWF's workplace education programme to set up systems to prevent workplace harassment and violence.

Comment: Sol's has taken the following actions to address fire and building safety in Bangladesh:

- Collected inspection reports of the Accord and the Alliance. Over 50% of the volume in Bangladesh has been audited by the Accord.
- Followed up on the corrective action plan of these inspection reports.
- Discussion with suppliers to support remediation.
- Suppliers accounted for 24% of the production volume in Bangladesh had participated the fire and building safety workshop organised by FWF.

Sol's has demonstrated its effort to have in-depth discussions with suppliers on gender equality as part of the FWF audit report followup. Sol's recognised that there are cultural difficulties to ensure women's equal opportunities in the factories. Sol's has not yet enrolled suppliers to join the Workplace Education Programme.

2.6b High risk issues specific to Myanmar are identified and addressed by the monitoring system and remediation activities.	Not sourcing in Myanmar	Myanmar is still in the process of establishing the legal and civil society infrastructure needed to ensure compliance with labour rights. Extra care must be taken when doing business in Myanmar.	Shared CAPs, Wage Ladders per factory.	N/A	3	0
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: Sol's has a common supplier with another FWF member in Bangladesh. Sol's is willing to share information and cooperate in audits. The other FWF member has not yet confirmed cooperation.

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
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2.9 External brands resold by the affiliate who have completed and returned the external brand questionnaire. (% of external sales volume)	No external brands resold	FWF believes it is important for affiliates that have a retail/wholesale arm to at least know if the brands they resell are members of FWF or a similar organisation, and in which countries those brands produce goods.	Questionnaires are on file.	N/A	3	0
2.10 External brands resold by affiliates that are members of another credible initiative. (% of external sales volume)	No external brands resold	FWF believes affiliates who resell products should be rewarded for choosing to stock external brands who also take their supply chain responsibilities seriously.	External production data in FWF's information management system. Documentation of sales volumes of products made by FWF or FLA members.	N/A	3	0

MONITORING AND REMEDIATION

Possible Points: 30

Earned Points: 19

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

Recommendation: Sol's should make sure that photos are collected to demonstrate the posting of the Workers information sheet.

Comment: Sol's has a system to ensure the posting of the Workers information sheet. The buying department regularly checked the posts during their annual visits at all factories. It is not a standard practice to make photos of the posts.

Seven out of eight factories audited in 2015 have posted the information sheets according to requirements.

3.3 Percentage of FWF-audited factories where at least half of workers are aware of the FWF worker helpline.	9%	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.	1	4	-2
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Recommendation: Sol's is advised to suggest its suppliers to join FWF's Workplace Education Programme to raise workers' awareness on labour standards and FWF's helpline.

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

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.	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

Comment: A staff member in the buying department has joined the FWF seminar for affiliates. Sol's is also active in webinars organised by FWF.

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: Sol's could invite the agent in China to join FWF's suppliers seminars to gain more knowledge on social compliance.

Comment: Sol's works with agents in countries such as China due to language issues. The agents are trained by Sol's to follow up on audit reports. The agents are aware of FWF's requirements. The agents are not always able to gain commitment of the suppliers to implement changes that are challenging, such as overtime and wages.

4.4 Factory participation in Workplace Education Programme (where WEP is offered; by production volume)	6%	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: Sol's could invite more suppliers to join FWF's Workplace Education Programme.

Comment: A shared supplier of Sol's and another FWF member company has participated in a training organised by FWF in 2013. Sol's has encouraged the factory to join further training.

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: About 8% of Sol's production volume comes from Pakistan. Sol's could organise training on labour standards in suppliers in Pakistan. FWF could provide support on recommending trainers and discussing training requirements.

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	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: In 2016, Sol's could make more effort to include all production locations in the database for suppliers. The company needs to have information on all production locations including cutting sewing, garment knitting, embroidery, printing, and etc.

Comment: Sol's is in the process of identifying all production locations. A number of subcontractors were identified during audits in 2015.

Sol's has required all suppliers to submit data on capacity and efficiency on production. Staff of Sol's visits production locations and verify the data. This contributes to preventing unauthorised subcontracting.

Sol's has a local office in Bangladesh. It is able to visit and monitor production frequently. Over 80% of FOB of Sol's are made in Bangladesh.

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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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	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

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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Recommendation: FWF approach requires transparency on members' work towards social standards. The social report needs to be submitted to FWF and published on Sol's 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: Top management of Sol's is involved in meetings regularly to discuss labour standards at main suppliers. The top management evaluates FWF membership in annual meetings.

7.2 Changes from previous Brand Performance Check implemented by affiliate	50%	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.	4	4	-2
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Comment: Four requirements were raised in the previous performance check:

1. Sol's should conduct root cause analysis of excessive overtime.

Sol's has started root cause analysis and supported one supplier in China to reduce overtime. Sol's sourcing strategy also prevents excessive overtime. According to FWF audits in 2015, the suppliers where Sol's had high leverage had no excessive overtime issue. (see 1.6 and 1.7 for more information)

2. Sol's should have a pricing policy that ensure minimum wages are paid.

Sol's uses opening costing with its suppliers. Sol's has the knowledge of exact labour cost per minute at style level in each suppliers based on their respective efficiency and capacity. (See 1.8 for more information)

3. Sol's should provide a complete suppliers list to FWF.

Sol's is in the process of identifying all production locations. (See 5.1 for more information)

4. Sol's should publish its social report on its website.

Sol's is yet to publish its social report on its website. (See 6.3 for more information)

EVALUATION

Possible Points: 6

Earned Points: 6

RECOMMENDATIONS TO FWF

NA

SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	28	40
Monitoring and Remediation	19	30
Complaints Handling	4	7
Training and Capacity Building	5	15
Information Management	4	7
Transparency	2	4
Evaluation	6	6
Totals:	68	109

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

62

PERFORMANCE BENCHMARKING CATEGORY

Good

BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

29-06-2016

Conducted by:

Juliette Li

Interviews with:

Alexandra Bourderye, Buyer, CSR responsible

Clement Le Meur, Purchase & Production Process Manager, CSR Manager

Olivier Boncorps, Sales Manager

Christelle Lopez, Marketing 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.