



# BRAND PERFORMANCE CHECK

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Epona Ltd

PUBLICATION DATE: NOVEMBER 2016

this report covers the evaluation period 01-07-2015 to 30-06-2016

## 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

Epona Ltd

Evaluation Period: 01-07-2015 to 30-06-2016

AFFILIATE INFORMATION	
Headquarters:	London, United Kingdom
Member since:	01-10-2015
Product types:	Fashion
Production in countries where FWF is active:	Bangladesh, India
Production in other countries:	n/a
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	100%
Benchmarking score	54
Category	Good

## Summary:

Epona is in process of implementing FWF's management system requirements. During the first year of membership Epona has informed all suppliers about the Code of Labour Practices and ensured the questionnaires were signed and returned. During meetings and visits with suppliers each labour standard is discussed and explained with the factory owners/managers. Thanks to its small supplier base, Epona has managed to monitor 100% of its suppliers and therefore meets the threshold of 40% for first year members.

Epona's sourcing practices generally support implementation of the Code of Labour Practices. The company has a small supplier base with a long term relation to its main supplier, accounting for 88% of the company's 2015 purchasing volume. However, Epona's rather small leverage - 12% of its production volume comes from suppliers where Epona buys at least 10% of the production capacity - makes it challenging to effectively request improvements of working conditions.

Epona has followed-up on corrective actions of existing audit reports of other clients in the factories in Bangladesh and India.

FWF recommends Epona to increase leverage at its main supplier(s) to effectively request improvements of working conditions.

Further steps can be taken by gaining more insight into establishing a solid production planning system on the production capacity of the factory for regular working hours.

## 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	12%	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.	1	4	0

Recommendation: FWF recommends Epona to increase leverage at its main supplier(s) to effectively request improvements of working conditions.

Comment: 12% of Epona's production volume in their last financial year is bought from factories where Epona has substantial leverage (at least 10% of the factory's production capacity).

1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years	88%	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: Epona has a long-term relationship with its main supplier. 88% of their purchasing volume in the last financial year comes from a factory they have worked with since 2010.

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: In Epona's first year of membership all factories were informed of membership. All questionnaires and the Code of Labour Practices were signed and returned.

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:** A risk analysis as part of the decision-making process of selecting new suppliers is an important step to mitigate risk and prevent potential problems.

FWF recommends Epona to improve documentation per factory that includes the outcomes of a visit as part of the risk analysis. Besides using information from FWF such as country studies, wage ladders and the Health and Safety guidelines, Epona can cooperate with local stakeholders to further investigate the situation in a specific country. FWF can offer information on local stakeholders.

**Comment:** New suppliers are commonly sourced through desk research with guidance from Fair Trade, WRC database and Sedex. Existing audit reports are collected and assessed with FWF's assessment tool. Epona's scorecard for new suppliers is based on due diligence findings and the policy of Epona's mother company NUS. High risks are checked with use of FWF's country studies.

A new potential production location was selected in 2015/2016, where Epona ran a trial order. Factory visits are done prior to official agreements. Meeting reports and pictures of the visit are documented. The supplier's level of dedication to CSR, especially the level of appetite for the topic living wage, is very important. Epona signed an MoU with one other FWF member brand, regarding efforts to work towards a living wage at their Indian 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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**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 Epona consistently evaluates the entire supplier base and includes information into decision-making procedures.

**Comment:** Evaluation of supplier's compliance with the Code of Labour Practices is important to Epona, but given the fact that there is only one main supplier where they have very small leverage it is hard to evaluate compliance and reward improvements. Plans are there to start systematic evaluation once other suppliers are selected.

The potential new supplier in India is still in the trial stage and could therefore not yet be evaluated.

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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**Requirement:** A good production planning system needs to be established based on the production capacity of the factory for regular working hours.

**Comment:** Epona believes that its production planning does not add pressure to working hours. Due to Epona's main target group - universities and colleges - deadlines are very important and need to be met. Delays mostly occur because of bigger customers of the supplier given precedence. Despite the small buying power at Epona's main supplier, they do plan production in close communication with the factory through their Production Manager or freelance India Team. Forecasting and production planning on Epona's side is therefore as thoroughly done as possible and extra time is built in for possible delays. Also, air freight is considered an option as a last resort when delays occur, to avoid adding pressure to the working hours.

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:** Epona 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. Epona could first start supporting factories where it has a higher leverage (buying more than 10% of the production capacity).

**Comment:** Excessive overtime is found during FWF audits in 2015 at Epona's supplier in Bangladesh. Epona discussed with factory management the causes of excessive overtime, but given Epona's position it is very difficult to push for solutions. Air freight and a good critical path is used by Epona to allow delays and minimise the risk of excessive overtime.

1.8 Affiliate's pricing policy allows for payment of at least the legal minimum wages in production countries.	Country-level policy	The first step towards ensuring the payment of minimum wages - and towards implementation of living wages - is to know the labour costs of garments.	Formal systems to calculate labour costs on per-product or country/city level.	2	4	0
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**Recommendation:** When Epona 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 at least minimum wages, and moving towards living wages.

**Comment:** Epona is well aware of the minimum wages per production country. Wages are investigated per area, using the FWF wage ladder. The exact cost of labour is not yet known by Epona, as the Bangladeshi supplier does not provide the necessary information. With the smaller Indian supplier, a first step in gaining insight into the cost price was taken by calculating labour costs.

1.9 Affiliate actively responds if suppliers fail to pay legal minimum wages.	No minimum wage problems reported	If a supplier fails to pay minimum wage, FWF affiliates are expected to hold management of the supplier accountable for respecting local labour law.	Complaint reports, CAPs, additional emails, FWF audit reports or other documents that show minimum wage issue is reported/resolved.	2	2	-2
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1.10 Evidence of late payments to suppliers by affiliate.	No	Late payments to suppliers can have a negative impact on factories and their ability to pay workers on time. Most garment workers have minimal savings, and even a brief delay in payments can cause serious problems.	Based on a complaint or audit report; review of factory and affiliate financial documents.	0	0	-1
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1.11 Degree to which affiliate assesses root causes of wages lower than living wages with suppliers and takes steps towards the implementation of living wages.	Basic approach	Sustained progress towards living wages requires adjustments to affiliates' policies.	Documentation of policy assessments and/or concrete progress towards living wages.	2	8	0
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**Recommendation:** FWF encourages Epona to use the analysis of wage levels to support steps towards living wage benchmarks as estimated by local stakeholders. FWF has developed experience with approaches that ensure that production workers in the selected facility take full benefit from the additional amounts that are committed to wage increases. FWF could give Epona specific guidance on process rollout upon request. Epona is encouraged to assess the hypothetical cost effects of increasing wages towards benchmarks that are included in the wage ladder. To support companies in this process FWF has developed a calculation model that estimates the effect on FOB and retail prices under different pricing models.

**Comment:** Epona has researched the wage levels in FWF's Wage Ladder system for the countries it has production, Bangladesh and India. At the supplier in India, Epona signed an MoU with two other FWF member companies to support paying their share of a living wage. Unfortunately the business relationship with this factory is currently on hold because of quality issues.

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: 22

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## 2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	100%	
% 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	100%	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: The product manager is in direct contact with the suppliers. In close cooperation with Epona's external CSR consultant, the product manager is designated to follow up on problems.

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: To facilitate remediation, Epona Clothing could consider to provide factory training, hire a local consultant or to provide financial support to the supplier.

**Comment:** In Epona's last financial year, an FWF audit was done at Epona's supplier in Bangladesh, as well as at the supplier in India. Active follow up of the audit at the Bangladeshi supplier was done, however topics such as wages and working hours are difficult to remediate due to the low leverage Epona has at this supplier.

The audit at Epona's supplier in India took place before the company became member of FWF. The audit report was shared with Epona, but before active follow up could be done, Epona withdrew from this supplier.

2.3 Percentage of production volume from suppliers that have been visited by the affiliate in the past financial year	100%	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:** All units were visited by the production managers for both quality and development purposes as well as follow up or selection of new suppliers. Visit reports were made after each of the visits and well documented.

2.4 Existing audit reports from other sources are collected.	Yes and quality assessed	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.	2	3	0
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**Comment:** In Epona's first year of FWF membership several audit reports were collected: a WRC audit report and Accord reports from the supplier in Bangladesh and an FWF audit report from the supplier in India. Implementation of corrective actions was done, communication with the supplier in Bangladesh was shown. Follow up of corrective actions for the supplier in India was not done, as Epona stopped production at this factory.

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
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

**Recommendation:** A specific policy on how to address and mitigate risks in India may help to identify additional monitoring or remediation efforts. Additional commitments may be needed to mitigate risks. A training as part of FWF's Workplace Education Programme in India could specifically address the potential risk of gender discrimination or gender based violence in the workplace

**Comment:** The majority of Epona's production, accounting for 88% of total FOB purchases in the last financial year, takes place in Bangladesh, which is covered under indicator 2.6a. The remaining 12% is sourced from a supplier in India. Epona plans to increase production in India in the next financial year. A risk analysis for factories in Bangladesh and the Indian region Tamil Nadu was made. For the next year this overview will be used to mitigate the risks.

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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**Recommendation:** Epona could consider taking more explicit steps to deal with harassment at the work floor in Bangladesh, for example by stimulating the supplier to take part in the WEP programme and facilitate the establishment of Anti Harassment Committees.

**Comment:** In Bangladesh, Epona's supplier has participated in FWF's workshop on safety principles. Eventhough Epona did not sign the Accord, it has collected and followed up on CAPs from the Accord's inspections.

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	Active cooperation	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.	2	2	-1
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**Recommendation:** Cooperation among customers increases leverage, the chances of successful outcomes and long term improvements. FWF recommends Epona to continue searching for collaboration opportunities.

**Comment:** The suppliers in both India and Bangladesh are shared with other FWF members. Audit reports and CAPs are shared with the various member companies. Epona teamed up with another member to follow up on corrective actions at the supplier in Bangladesh, however halfway through the year the other FWF member ended his relationship with the supplier. Epona is now trying to get in touch with two of the other bigger non-member customers of this supplier. The aim is to share best practices and next steps, to decide on possible shared actions.

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)	0%	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.	0	3	0

**Requirement:** Epona should receive a completed and returned questionnaire from external brands resold by the member company.

**Comment:** Epona's 2% sales volume that is bought from external brands, consists mostly of FWF member brands. Only a very small percentage (less than 0.5%) is bought from non-FWF brands, but for these the external brand questionnaire has not been send yet.

2.10 External brands resold by affiliates that are members of another credible initiative. (% of external sales volume)	90%	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.	3	3	0
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Comment: The percentage of external brands resold by Epona, affiliated to FWF is around 90% of the total external sales volume.

## MONITORING AND REMEDIATION

Possible Points: 36

Earned Points: 23

### 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	1	
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

Comment: Epona's production manager is responsible for addressing worker complaints, in close cooperation with the external CSR consultant.

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
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Comment: In Epona's first year of membership checklists and follow-up overviews were created and used. Photographic evidence is saved and factory visit log is kept, including health&safety checklists and Epona's own CSR criteria.

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:** Epona is advised to stimulate its main supplier to participate in WEP trainings, to raise awareness about the existence and the functioning of FWF worker's helpline.

**Comment:** In the last financial year, two FWF audits were conducted at Epona suppliers. At the supplier in India, workers were aware of the FWF worker 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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**Comment:** During the last financial year, one complaint was received from a shared supplier, but this was before Epona started its FWF membership.

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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Comment: Epona received one complaint at one of their factories. There was no cooperation possible with other FWF members, as the other FWF member stopped working with the supplier. However, Epona did try to get other customers sourcing from this factory to follow-up on the complaint, without any result.

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## COMPLAINTS HANDLING

Possible Points: 7

Earned Points: 6

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## 4. TRAINING AND CAPACITY BUILDING

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.1 All staff is made aware of FWF membership requirements	Yes	Preventing and remediating problems often requires the involvement of many different departments; making all staff aware of FWF membership requirements helps to support cross-departmental collaboration when needed.	Emails, trainings, presentation, newsletters, etc.	1	1	-1

Comment: As Epona is very small, each employee is made aware of FWF membership requirements during meetings and through mailings.

The plan is to organize specific meetings every six months to train and update the staff.

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
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Requirement: Sourcing, purchasing and CSR staff at a minimum should possess knowledge necessary to implement FWF requirements.

Comment: Due to staff changes, no training was done in this financial year. FWF member seminar and webinars will be attended in the next year.

4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices.	Affiliate does not use agents	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.	N/A	2	-2
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4.4 Factory participation in Workplace Education Programme (where WEP is offered; by production volume)	0%	Lack of knowledge and skills on best practices related to labour standards is a common issue in factories. Good quality training of workers and managers is a key step towards sustainable improvements.	Documentation of relevant trainings; participation in Workplace Education Programme.	0	6	0
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**Requirement:** Manufacturers and their workers should be systematically informed about FWF and the implementation of the Code of Labour Practices. All factory management and workers should be informed and aware about the relevant labour standards and grievance mechanisms.

**Comment:** None of Epona's suppliers has participated in the Workplace Education Programme yet, but the main supplier will be approached for this in the next financial year.

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: 9

Earned Points: 1

## 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:** Epona is advised to develop a systematic approach to complete the supplier list.

**Comment:** Suppliers are visited at least once per year by Epona staff. Besides FWF's requirements, Epona's affiliation with WRC (Worker Rights Consortium) requires them to ensure all locations are known too.

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:** Epona works internally with an informal information system, which suffices given the small size of the company. Their FWF folder is accessible for all staff on the Epona server, all data are kept in that folder.

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## INFORMATION MANAGEMENT

Possible Points: 7

Earned Points: 4

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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
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 Epona to publish one or more of the following reports on its website: brand performance check, audit reports, supplier information. Good reporting by member brands helps to ensure the transparency of Epona and FWF's work.

6.3 Social Report is submitted to FWF and is published on affiliate's website	Incomplete or not done	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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## TRANSPARENCY

Possible Points: 4

Earned Points: -1

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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: During every NUS (Epona's mother company) board meeting, taking place at least bi-annually, the progress of FWF membership activities is shared by Epona's CSR staff and evaluated by the board.

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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## EVALUATION

Possible Points: 2

Earned Points: 2

## RECOMMENDATIONS TO FWF

Epona would appreciate FWF to provide templates for score cards to evaluate supplier performance. Furthermore, Epona recommends FWF to improve communication about basic steps of membership. Epona recommends FWF to continue developing learning opportunities for apparel employees in the field of labour rights.

## SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	22	40
Monitoring and Remediation	23	36
Complaints Handling	6	7
Training and Capacity Building	1	9
Information Management	4	7
Transparency	-1	4
Evaluation	2	2
Totals:	57	105

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

54

### PERFORMANCE BENCHMARKING CATEGORY

Good

## BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

28-09-2016

Conducted by:

Hendrine Stelwagen

Interviews with:

Suzanne Wilcox - CSR consultant to NUS and Epona

Tom Andrews - CEO, managing director Epona

Rachel Soper - ethical supply chain coordinator NUS

Clare Chambers - production 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.