



BRAND PERFORMANCE CHECK

Triaz GmbH

PUBLICATION DATE: JULY 2019

this report covers the evaluation period 01-01-2018 to 31-12-2018

ABOUT THE BRAND PERFORMANCE CHECK

Fair Wear Foundation believes that improving conditions for apparel product location workers requires change at many levels. Traditional efforts to improve conditions focus primarily on the product location. FWF, however, believes that the management decisions of clothing brands have an enormous influence for good or ill on product location conditions.

FWF's Brand Performance Check is a tool to evaluate and report on the activities of FWF's member companies. The Checks examine how member company management systems support FWF's Code of Labour Practices. They evaluate the parts of member company 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 product locations, and most product locations work for many different brands. This means that in most cases FWF member companies have influence, but not direct control, over working conditions. As a result, the Brand Performance Checks focus primarily on verifying the efforts of member companies. Outcomes at the product location level are assessed via audits and complaint reports, however the complexity of the supply chains means that even the best efforts of FWF member companies cannot guarantee results.

Even if outcomes at the product location level cannot be guaranteed, the importance of good management practices by member companies cannot be understated. Even one concerned customer at a product location 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 product location 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 member company 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

Triaz GmbH

Evaluation Period: 01-01-2018 to 31-12-2018

MEMBER COMPANY INFORMATION	
Headquarters:	Freiburg im Breisgau, Germany
Member since:	01-09-2011
Product types:	Fashion
Production in countries where FWF is active:	China, India, Macedonia, Republic of, Romania, Tunisia, Turkey
Production in other countries:	Bosnia and Herzegovina, Germany, Greece, Lithuania, Poland, Slovakia, Spain, Ukraine
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
SCORING OVERVIEW	
% of own production under monitoring	99%
Benchmarking score	83
Category	Leader

Summary:

In 2018 Triaz showed advanced results on performance indicators and has made exceptional progress. Triaz has monitored 99% of its own production and, with a benchmarking score of 83, has been awarded the 'Leader' category again.

Triaz has a systematic way of approaching FWF membership, sufficient capacity to monitor and follow up and a dedicated attitude to inform, train and learn with suppliers how to improve further. The brand has the ability to actually find root causes at the production location level and to identify measures to improve.

Triaz has continued its efforts to work on the planning and prevention of excessive overtime in its supply chain, which seems to be reflected in the audit results. Triaz has also worked on living wages by doing a wage analysis of sample products at some of its key suppliers and setting target wages. The analyses show that at those suppliers, prices were in theory high enough to pay a living wage. Based on that information, Triaz began a root cause analysis of why living wages were not paid. Furthermore, where possible, the brand contributed to changing the working process to overcome the identified issue.

PERFORMANCE CATEGORY OVERVIEW

Leader: This category is for member companies 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 member companies who are making a serious effort to implement the Code of Labour Practices—the vast majority of FWF member companies—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 member companies will receive a 'Good' rating.

Needs Improvement: Member companies 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. Member companies 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: Member companies 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. Member companies 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
1.1a Percentage of production volume from production locations where member company buys at least 10% of production capacity.	74%	Member companies with less than 10% of a production location's production capacity generally have limited influence on production location managers to make changes.	Supplier information provided by member company.	3	4	0

Comment: At 74% of its production locations, Triaz buys at least 10% of the production capacity. Triaz has four main suppliers, one is in a low-risk country (Germany). At three key production locations in high-risk countries and several smaller suppliers, the brand's leverage reaching 60-90% of the supplier's capacity. This makes Triaz (one of the) main clients at many production locations of its supply chain and gives them a relatively strong position to work on the Code of Labour Practices (CoLP), together with these suppliers.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.1b Percentage of production volume from production locations where member company buys less than 2% of its total FOB.	14%	FWF provides incentives to clothing brands to consolidate their supplier base, especially at the tail end, as much as possible, and rewards those members who have a small tail end. Shortening the tail end reduces social compliance risks and enhances the impact of efficient use of capital and remediation efforts.	Production location information as provided to FWF.	2	4	0

Comment: With 14% of the production volume from production locations where Triaz buys less than 2% of its total FOB, the brand has a relatively long 'tail end' for production. In 2018, the brand on-boarded nine suppliers, which caused an increase of tail-end. The brand decided to spread the sourcing risk as it felt too independent of its existing suppliers. Next financial year Triaz will consolidate its tail-end.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.2 Percentage of production volume from production locations where a business relationship has existed for at least five years.	85%	Stable business relationships support most aspects of the Code of Labour Practices, and give production locations a reason to invest in improving working conditions.	Supplier information provided by member company.	4	4	0

Comment: 85% of Triaz' production volume comes from production locations where the brand's business relationship has existed for at least five years. Triaz' sourcing strategy is focused on long-lasting partnerships with suppliers to deliver high-quality products consistently and willingness to further increase sustainability (environmental, social) in the production process.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.3 All (new) production locations are required to sign and return the questionnaire with the Code of Labour Practices before first bulk orders are placed.	Yes	The CoLP is the foundation of all work between production locations and brands, and the first step in developing a commitment to improvements.	Signed CoLPs are on file.	2	2	0

Comment: Nine new suppliers were added to Triaz's supply chain in 2018. In the supplier management system, orders cannot be placed before the questionnaire is signed and returned. Triaz showed proof of several returned questionnaires.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.4 Member company conducts human rights due diligence at all (new) production locations before placing orders.	Advanced	Due diligence helps to identify, prevent and mitigate potential human rights problems at suppliers.	Documentation may include pre-audits, existing audits, other types of risk assessments.	4	4	0

Comment: The due diligence process for onboarding new suppliers is well-known within the company and clearly and consistently explained by the different departments. The Triaz internal wiki has a page which is designed as a checklist with several steps and clearly defined responsibilities for different department. When one step is finished, the next person receives a notification to further continue. All steps have to be done and documented before sourcing can place any orders.

The first step is the buying department that identifies a new supplier. In the second step, the CSR department is identifying country-specific risks, collecting previous audits, analyses and discusses the audit results with the supplier, sending and explaining the CoLP and receiving the completed questionnaire. In addition to this, an intensive due diligence process for explaining and checking material specifications and ecological requirements is started. For each product, a production pass is developed. A next step is a visit to the potential new production location by a Triaz staff member prior to starting production.

Triaz sees the onboarding of new supplier as an investment. It usually takes two or three loops before a new supplier understands how Triaz likes to work. After a while, Triaz sees changes and suppliers adopting new processes and procedures.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.5 Production location compliance with Code of Labour Practices is evaluated in a systematic manner.	Yes, and leads to production decisions	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.	2	2	0

Comment: Triaz has a supplier rating system to support its annual evaluation of all suppliers which is done by the so-called Supplier Management Project team. Every department that has worked with suppliers, assesses the supplier based on indicators. The CSR team indicators on social compliance give insight into the responsiveness of the supplier and the ability/willingness to improve on remediation of CAPs and working on the CoLP. The price of a product is not included in the supplier rating.

The brand shares the results and improvements with the supplier and together the brand and supplier set a timeframe to work on these.

The evaluation of the suppliers is related to production decisions. The CSR team has a veto and if a supplier is not progressing to improve its social compliance the team can use this veto to terminate relationships with that supplier. The suppliers with good ratings are generally given more orders, or Triaz works with them more closely on how to further support their work.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.6 The member company's production planning systems support reasonable working hours.	Strong, integrated systems in place.	Member company production planning systems can have a significant impact on the levels of excessive overtime at production locations.	Documentation of robust planning systems.	4	4	0

Comment: Triaz has close cooperation and an ongoing dialogue with its key suppliers and works together with them on the production planning for all its garments. For several suppliers, Triaz showed and explained the process in detail during the brand performance check. In all three cases, the production planning works slightly different, depending on how the suppliers prefer to work.

At its Chinese supplier, Triaz shares a forecast for a year in November including specifications per month and minimum and maximum quantities. The plan is discussed, the factory gives feedback and the lead times, and the planning is adjusted. Triaz does an advanced payment for the factory to order materials. The factory struggles with the scarcity of staff as a result of the location, the living costs and the competition of other industries. In the case of late delivery, the brand adjusts its deadlines and does not put pressure on its supplier, even if that means that new styles are not yet in stock when sales start. Although Triaz has very loyal green consumers, the brand sees the risk.

At its Turkish supplier, Triaz has a comparable approach. To reduce overtime Triaz and the supplier worked on ordering yarn in advance and building stock, which lead to a reduction of lead times.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.7 Degree to which member company mitigates root causes of excessive overtime.	Advanced efforts	Some production delays are outside of the control of member companies; however there are a number of steps that can be taken to address production delays without resorting to excessive overtime.	Evidence of how member responds to excessive overtime and strategies that help reduce the risk of excessive overtime, such as: root cause analysis, reports, correspondence with factories, etc.	6	6	0

Comment: In the 2018 FWF audits, no excessive overtime was found. During the year Triaz monitored working hours and did a root cause analysis at a Turkish supplier, where the brand discovered overtime. The analysis revealed that the main cause of overtime was a shortage of knitting machines. The factory bought two knitting machines which had a positive effect on overtime and also lead to an average reduction of lead times.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.8 Member company can demonstrate the link between its buying prices and wage levels in production locations.	Advanced	Understanding the labour component of buying prices is an essential first step for member companies towards ensuring the payment of minimum wages – and towards the implementation of living wages.	Interviews with production staff, documents related to member's pricing policy and system, buying contracts.	4	4	0

Comment: For some years, Triaz has been working on open costing for all the main suppliers. The brand chooses to work on open costing and did a sample of products to calculate this for. Triaz sees these sample products as representative of all styles produced at that factory. The samples are chosen by the purchasing department, CSR requests to include the relatively lower price styles. At this point the brand chooses to spend their CSR capacity at the most urgent issues at their suppliers, namely planning and making sure the money reaches the worker, instead of calculations.

For the samples at the main suppliers, Triaz knows the direct labour costs and the labour minutes per style. The brand is also aware of minimum wages per country and wage ladders. For the selected products, Triaz made a calculation that demonstrates a link between their buying prices and wage levels at the production location. The methodology of how to calculate this is not clearly written down and is different than the methodology FWF uses for these calculations.

At its Chinese supplier, the brand made calculations for samples. The brand knows the cost breakdown of different parts. The result of these calculations was that the supplier could pay the Asia floor wage to the workers, based on a calculation without overtime. Triaz is the only client of this factory and 50% owner as well, has insight into the wages and checked what the supplier actually paid. It learned that the Asia floor wage was not paid last year, although according to the calculation, the supplier should be able to pay this. This year, it started a root cause analysis why it was not paid (see indicator 1.11)

For suppliers in Bosnia, Tunisia, and Turkey, calculations were also made. For these factories result of the calculation was comparable: based on the prices for the sample styles, theoretically, wages could reach the level of living wage benchmark. For these suppliers, the brand also started root cause analysis. If the theoretical calculation shows that living wage cannot be paid, Triaz will adjust the buying price accordingly.

Recommendation: To strengthen the calculation method and make it more systematically applicable FWF recommends Triaz to describe and document the methodology that is used to do the open costing calculations.

If Triaz prefers to continue to sample items per factory, FWF advises Triaz to develop guidelines for the purchasing department how to sample to make sure that the sample actually reflects the situation for other products. In case Triaz would like to calculate for all styles, FWF recommends Triaz to investigate if relevant information for the open costing and calculations could be added to the 'production pass' which Triaz makes for each style.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.9 Member company actively responds if production locations fail to pay legal minimum wages and/or fail to provide wage data to verify minimum wage is paid.	No problems reported/no audits	If a supplier fails to pay minimum wage or minimum wage payments cannot be verified, FWF member companies are expected to hold management of the supplier accountable for respecting local labour law. Payment below minimum wage must be remediated urgently.	Complaint reports, CAPs, additional emails, FWF Audit Reports or additional monitoring visits by a FWF auditor, or other documents that show minimum wage issue is reported/resolved.	N/A	0	-2

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.10 Evidence of late payments to suppliers by member company.	No	Late payments to suppliers can have a negative impact on production locations 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 production location and member company financial documents.	0	0	-1

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.11 Degree to which member company assesses and responds to root causes for wages that are lower than living wages in production locations.	Advanced	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach	Evidence of how payment below living wage was addressed, such as: Internal policy and strategy documents, reports, correspondence with factories, etc	6	6	0

Comment: As described under indicator 1.8, Triaz has started assessing wage levels in their key production locations systematically and deepen their understanding of cost breakdowns.

For four suppliers the brand did a root cause analysis after finishing the theoretical calculation. For the Chinese factory, this is described under 1.8, including actions initiated after the root cause analysis. Triaz found that during the low season the wages were not sufficient to pay to conform to Asian Floor Wage and started to spread the orders more evenly.

The root cause analysis in the Tunisian factory showed that the inflation rate of the Tunisian Dinar was an issue. To overcome this, Triaz and the supplier started to calculate the amount of wage in Euro's and at that moment, depending on the currency, translate it to Dinar before paying.

At their Bosnian supplier, Triaz has found another main root cause, related to legal constraints. In Bosnia, the textile industry is relatively small and factories receive tax advantages if they keep the wages low. Other textile factories have a tendency to lower the wages, which means that for Triaz' supplier it was seen as a success that in the country the minimum wage was not lowered, but kept at the same standard.

In Turkey, there was a minimum wage raise of 30%. This already had financial consequences for the Turkish supplier, so Triaz decided not to push that supplier at this point in time to assure that the factory stays financially viable.

Recommendation: FWF encourages Triaz to involve worker representatives and local organisations in assessing the root causes of wages lower than living wages.

It is advised that the outcomes of the root cause analysis are discussed internally and with top management, to form a basis for an embedded strategy.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.12 Percentage of production volume from factories owned by the member company (bonus indicator).	11%	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 member company's score.	Supplier information provided by member company.	1	2	0

Comment: Triaz owns 50% of a production location in China (11% production volume).

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.13 Member company determines and finances wage increases	Intermediate	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach.	Evidence of how payment below living wage was addressed, such as: internal policy and strategy documents, reports, correspondence with factories, etc.	2	4	0

Comment: In 2018 Triaz set a target wage for the Tunisian and Bosnian suppliers (32% FOB). For the Bosnian supplier, where the legal constraints are an issue, several non-financial incentives were included like free lunch and transport costs, which are included in the expenses but not in the salaries.

For the factory in Tunisia Triaz monitored and changed this during the financial year. Their target wage was 450 TND, which was reached it. Triaz realized that the data on which target wage was based, was old and the high inflation not included in the calculations. Together with the factory, it was agreed that the wage would be translated to Euro instead of Dinar and depending on the current inflation rate paid in Dinar.

Recommendation: FWF recommends Triaz to develop a policy and a process on setting target wages, based on up-to-date living wage benchmarks, and ways of financing these, which will help the brand to communicate the Triaz living wage approach internally and externally.

We advise companies to avoid the concept of a one-time charitable or cash contributions. FWF advises analyzing the impact of Triaz' response on the root causes and strongly recommend members to integrate the financing of wage increases in its own systems, herewith committing to a long term process that leads to sustainable implementation of living wages.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.14 Percentage of production volume where the member company pays its share of the target wage	32%	FWF member companies are challenged to adopt approaches that absorb the extra costs of increasing wages.	Member company's own documentation, evidence of target wage implementation, such as wage reports, factory documentation, communication with factories, etc.	2	3	0

Comment: For the Bosnian and Tunisian supplier (32% production volume), Triaz showed the calculation of how their share of the target wage is paid.

For a Turkish and Macedonian supplier target wages are set in 2019, at one supplier together with another FWF member brand. In addition, Triaz is active with a living wage for the production of their carpets, which is not included in the FWF scope.

Recommendation: It is advised that the outcomes of the root cause analysis are discussed internally and with top management, to form a basis for an embedded strategy. In addition, FWF advises Triaz to start verifying and checking if the target wage is actually paid to the workers.

PURCHASING PRACTICES

Possible Points: 49

Earned Points: 42

2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	81%	
% of production volume where monitoring requirements for low-risk countries are fulfilled	18%	To be counted towards the monitoring threshold. FWF low-risk policy should be implemented. See indicator 2.9. (N/A = no production in low risk countries.)
Meets monitoring requirements for tail-end production locations.	Yes	
Requirement(s) for next performance check		
Total of own production under monitoring	99%	Measured as percentage of production volume (Minimums: 1 year: 40%; 2 years 60%; 3 years+: 80-100%)

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: Triaz has dedicated CSR staff members to follow up on problems identified by the monitoring system

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.2 Quality of own auditing system meets FWF standards.	Member makes use of FWF audits and/or external audits only	In case FWF teams cannot be used, the member companies' own auditing system must ensure sufficient quality in order for FWF to approve the auditing system.	Information on audit methodology.	N/A	0	-1

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.3 Audit Report and Corrective Action Plan (CAP) findings are shared with factory and worker representation where applicable. 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

Comment: FWF audit reports and Corrective Action Plan (CAP) findings are shared with factory management and followed up during skype, mail or visit. The audit and CAP is not yet shared with worker representation.

Recommendation: Triaz should make efforts to ensure that worker representation, where applicable, also receives the audit report and are involved in the establishment of improvement timelines.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.4 Degree of progress towards resolution of existing Corrective Action Plans and remediation of identified problems.	Intermediate	FWF considers efforts to resolve CAPs to be one of the most important things that member companies can do towards improving working conditions.	CAP-related documentation including status of findings, documentation of remediation and follow up actions taken by member. Reports of quality assessments. Evidence of understanding relevant issues.	6	8	-2

Comment: Triaz has a systematic, well-organized and SMART process in place to follow-up on CAPs. The brand could show substantial progress made on various Corrective Action Plans of its suppliers. Triaz is cooperating with suppliers to remediate the issues identified in the CAPs, addressing both the issues that are more easily solved and the more complex topics.

The brand has a detailed knowledge of the situation at their main suppliers and is willing to find factory specific (root) causes to understand why issues are not improved.

Triaz does not yet systematically involve worker representation in the remediation process.

Recommendation: It is advised to include worker representation in the remediation process. Either to engage workers in identifying and implementing improvements or to verify realised improvements.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.5 Percentage of production volume from production locations that have been visited by the member company in the previous financial year.	98%	Formal audits should be augmented by annual visits by member company staff or local representatives. They reinforce to production location managers that member companies are serious about implementing the Code of Labour Practices.	Member companies should document all production location visits with at least the date and name of the visitor.	4	4	0

Comment: 98% of the production volume is visited last year.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.6 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

Comment: As described under indicator 1.4 external audits are gathered as one of the key due diligence steps, the reports are analysed and discussed with the production location.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.7 Compliance with FWF risk policies.	Average score depending on the number of applicable policies and results	Aside from regular monitoring and remediation requirements under FWF membership, countries, specific areas within countries or specific product groups may pose specific risks that require additional steps to address and remediate those risks. FWF requires member companies to be aware of those risks and implement policy requirements as prescribed by FWF.	Policy documents, inspection reports, evidence of cooperation with other customers sourcing at the same factories, reports of meetings with suppliers, reports of additional activities and/or attendance lists as mentioned in policy documents.	5	6	-2
Compliance with FWF enhanced monitoring programme Bangladesh	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF Myanmar policy	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on abrasive blasting	Advanced			6	6	-2
Compliance with FWF guidance on risks related to Turkish garment factories employing Syrian refugees	Intermediate			3	6	-2
Other risks specific to the member's supply chain are addressed by its monitoring system	Advanced			6	6	-2

Comment: All suppliers have signed and ensured that they will not use abrasive blasting, as this is part of the onboarding system, conform Triaz' policy. This topic is also covered in the production pass, a document that Triaz develops for each style which includes (environmental) information on materials and the different (chemical) processes.

Triaz has informed the Turkish suppliers on FWF's policy on Syrian Refugees and has been told there are currently no Syrian refugees working at their factories. Furthermore, Triaz informed their suppliers on the possibility to hire Syrian refugees and to cooperate with United Work, an NGO that collects the CVs of Syrian refugees in Turkey. None of the Turkish suppliers did this.

Triaz is aware of other country-specific risks and addresses these in contact with their suppliers. The brand has several projects which have the aim to prevent and/or mitigate risks as well. All tiers of the production process are involved in the Silk project in China, which enables Triaz to improve worker rights through the supply chain. The rug project in India has a focus on home-workers and their basic rights.

For Triaz, technological innovations can also contribute to improving workers conditions, like health and safety. Triaz will move the jeans production to the new production location of one of its high-end ecological suppliers. In this new location, a lot of the tasks with high health and safety risks will be done by robots. Workers do not get in contact with chemicals anymore. During the brand performance check, workers were moving to the new production location.

Recommendation: FWF recommends Triaz to formulate a detailed policy on Syrian refugee workers covering the responsibilities of the brand and its suppliers and shared them with their suppliers.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.8 Member company cooperates with other FWF member companies in resolving corrective actions at shared suppliers.	Active cooperation	Cooperation between customers increases leverage and chances of successful outcomes. Cooperation also reduces the chances of a factory having to conduct multiple Corrective Action Plans about the same issue with multiple customers.	Shared CAPs, evidence of cooperation with other customers.	2	2	-1

Comment: Triaz works very actively with other FWF members and other brands on monitoring, visiting and remediation at Corrective Action Plans at shared suppliers.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.9 Percentage of production volume where monitoring requirements for low-risk countries are fulfilled.	50-100% AND member undertakes additional activities to monitor suppliers	Low-risk countries are determined by the presence and proper functioning of institutions which can guarantee compliance with national and international standards and laws. FWF has defined minimum monitoring requirements for production locations in low-risk countries.	Documentation of visits, notification of suppliers of FWF membership; posting of worker information sheets, completed questionnaires.	3	3	0

Comment: Triaz sources from 11 factories in Germany, Greece, Slovakia, Poland, Lithuania and Spain. Triaz has received the FWF questionnaire and that the Worker Information Sheet is posted in all locations. At two production locations in Germany, Triaz has organized a social audit.

The Slovakian production location, where the brand started sourcing in 2018 is not visited, hence this production location is not calculated for the monitoring threshold. The leverage of the brand at this production location is lower than 10%.

While last year, Triaz received a requirement for monitoring in low risk, this year the brand has monitored conform FWF low-risk policy.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.10 Extra bonus indicator: in case FWF member company conducts full audits at tail-end production locations (when the minimum required monitoring threshold is met).	Yes	FWF encourages its members to monitor 100% of its production locations and rewards those members who conduct full audits above the minimum required monitoring threshold.	Production location information as provided to FWF and recent Audit Reports.	2	2	0

Comment: Triaz has visited 19,3% production in low-risk countries (18,6% monitored) and audited 81.4% of the production volume. Furthermore, Triaz has conducted audits in low-risk countries. One production location in India and one in Romania in the tail-end is not monitored; one production location in Slovakia is not visited.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.11 Questionnaire is sent and information is collected from external brands resold by the member company.	Yes, and member has collected necessary information	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.	2	2	0

Comment: The approach of Triaz towards external brands is comparable to own production: the brand has sent and received the questionnaire and other information. It has also collected audits or conducted audits and follows up on the CAP. Triaz does not work with external brands if they do not agree on sharing production data.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.12 External brands resold by member companies that are members of another credible initiative (% of external sales volume).	7%	FWF believes members who resell products should be rewarded for choosing to sell external brands who also take their supply chain responsibilities seriously and are open about in which countries they produce goods.	External production data in FWF's information management system. Documentation of sales volumes of products made by FWF or FLA members.	1	3	0

Comment: Triaz resells products of 4 FWF member brands and 2 brands that are a member of FLA, together responsible for 7% of the external sales volume.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.13 Questionnaire is sent and information is collected from licensees.	No licensees	FWF believes it is important for member companies to know if the licensee is committed to the implementation of the same labour standards and has a monitoring system in place.	Questionnaires are on file. Contracts with licensees.	N/A	1	0

MONITORING AND REMEDIATION

Possible Points: 37

Earned Points: 32

3. COMPLAINTS HANDLING

BASIC MEASUREMENTS	RESULT	COMMENTS
Number of worker complaints received since last check		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		
Number of worker complaints resolved since last check		

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: The CSR team is responsible to address received complaints.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.2 Member company has informed factory management and workers about the FWF CoLP and complaints hotline.	Yes	Informing both management and workers about the FWF Code of Labour Practices and complaints hotline is a first step in alerting workers to their rights. The Worker Information Sheet is a tool to do this and should be visibly posted at all production locations.	Photos by company staff, audit reports, checklists from production location visits, etc.	2	2	-2

Comment: Triaz requests pictures from all suppliers to ensure that the worker information sheet is posted in factories. This is checked during visits.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.3 Degree to which member company has actively raised awareness of the FWF CoLP and complaints hotline.	45%	After informing workers and management of the FWF CoLP and the complaints hotline, additional awareness raising and training is needed to ensure sustainable improvements and structural worker-management dialogue.	Training reports, FWF's data on factories enrolled in the WEP basic module. For alternative training activities: curriculum, training content, participation and outcomes.	4	6	0

Comment: Six production locations have participated in FWF's Workplace Education Programme basic module in 2016-2018 collectively accounting for 45% of Triaz' production volume in high-risk countries. The factories are located in Turkey, Macedonia, Tunisia and China.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.4 All complaints received from production location 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. Member company involvement is often essential to resolving issues.	Documentation that member company has completed all required steps in the complaints handling process.	N/A	6	-2

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.5 Cooperation with other customers in addressing worker complaints at shared suppliers	No complaints or cooperation not possible / necessary	Because most production locations supply several customers with products, involvement of other customers by the FWF member company 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	0

COMPLAINTS HANDLING

Possible Points: 9

Earned Points: 7

4. TRAINING AND CAPACITY BUILDING

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.1 All staff at member company are made aware of FWF membership.	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	0

Comment: The CSR team gives an internal training on FWF and GOTS in which it compares a conventional versus an ecological T-shirt where FWF requirements are explained as well. Each new staff member will spend time in the CSR team, as part of Triaz onboarding process for new staff members.

Every three months Triaz organizes an internal sustainability dialogue where FWF membership, and other sustainability items as the carpet project in India, the silk project in China, are on the agenda.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.2 All staff in direct contact with suppliers are informed of FWF requirements.	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	-1

Comment: Staff in direct contact with suppliers receive additional training by the CSR team, including country-specific information.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices.	Yes + actively support COLP	Agents have the potential to either support or disrupt CoLP implementation. It is the responsibility of member company to ensure agents actively support the implementation of the CoLP.	Correspondence with agents, trainings for agents, FWF audit findings.	2	2	0

Comment: The agents Triaz is working with are trained on FWF requirements and support Triaz on following up on remediation and improvements.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.4 Factory participation in training programmes that support transformative processes related to human rights.	0%	Complex human rights issues such as freedom of association or gender-based violence require more in-depth trainings that support factory-level transformative processes. FWF has developed several modules, however, other (member-led) programmes may also count.	Training reports, FWF's data on factories enrolled in training programmes. For alternative training activities: curriculum, training content, participation and outcomes.	0	6	0

Comment: Triaz could not show information that any of the factories were in a training programme supporting transformative processes related to human rights.

Recommendation: FWF recommends Triaz to implement training programmes that support factory-level transformation such as establishing functional internal grievance mechanisms, improving worker-management dialogue and communication skills or addressing gender-based violence. Training assessed under this indicator should go beyond raising awareness and focus on behavioural change and long-term structures to improve working conditions. To this end, members can make use of FWF's Workplace Education Programme communication or violence prevention module or implement advanced training through service providers or brand staff. FWF guidance on good quality training is available on the Member Hub.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.5 Degree to which member company follows up after a training programme.	No training programmes have been conducted or member produces solely in low-risk countries	After factory-level training programmes, complementary activities such as remediation and changes on brand level will achieve a lasting impact.	Documentation of discussions with factory management and worker representatives, minutes of regular worker-management dialogue meetings or anti-harassment committees.	N/A	2	0

TRAINING AND CAPACITY BUILDING

Possible Points: 11

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 member companies to first know all of their production locations.	Supplier information provided by member company. Financial records of previous financial year. Documented efforts by member company to update supplier information from its monitoring activities.	6	6	-2

Comment: The identification of all production locations is integrated into the onboarding process for new suppliers. For existing suppliers, Triaz is asking twice a year and in case of a new subcontractor, this factory has to go through the same onboarding process as all other suppliers.

For one Turkish supplier, there were subcontractors found during the audit; after a discussion with the supplier back and forward, Triaz visited the two subcontractors and organized audits.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
5.2 CSR and other relevant staff actively share information with each other about working conditions at production locations.	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

Comment: In the Supplier Management Project group, the suppliers are discussed in the weekly meetings. The CSR team is part of this project group and actively share information about working conditions and other relevant issues.

INFORMATION MANAGEMENT

Possible Points: 7

Earned Points: 7

6. TRANSPARENCY

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
6.1 Degree of member company compliance with FWF Communications Policy.	Minimum communications requirements are met AND no significant problems found	FWF's communications policy exists to ensure transparency for consumers and stakeholders, and to ensure that member communications about FWF are accurate. Members will be held accountable for their own communications as well as the communications behaviour of 3rd-party retailers, resellers and customers.	FWF membership is communicated on member's website; other communications in line with FWF communications policy.	2	2	-3

Comment: Triaz communicates about membership in catalogs, brochures and on its website. The communication is in line with the FWF Communication policy.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
6.2 Member company engages in advanced reporting activities	Published Brand Performance Checks, audit reports, and/or other efforts lead to increased transparency.	Good reporting by members helps to ensure the transparency of FWF's work and shares best practices with the industry.	Member company publishes one or more of the following on their website: Brand Performance Check, Audit Reports, Supplier List.	1	2	0

Comment: www.waschbaer.de has the latest FWF Brand Performance Check report on the site. However, not all international websites are up-to-date, the latest brand performance check on the Dutch website is for example the 2014 brand performance check report.

Recommendation: FWF recommends to assure that all waschbaer websites are up to date.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
6.3 Social Report is submitted to FWF and is published on member company's website	Complete and accurate report submitted to FWF AND published on member's website.	The social report is an important tool for members to transparently share their efforts with stakeholders. Member companies should not make any claims in their social report that do not correspond with FWF's communication policy.	Social report that is in line with FWF's communication policy.	2	2	-1

Comment: Triaz has submitted its social report to FWF and has published the report on its website.

TRANSPARENCY

Possible Points: 6

Earned Points: 5

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 is regularly informed about FWF updates by the CSR team and the reports of last year's Brand Performance Check were discussed with top management as well.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
7.2 Level of action/progress made on required changes from previous Brand Performance Check implemented by member company.	100%	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.	Member company should show documentation related to the specific requirements made in the previous Brand Performance Check.	4	4	-2

Comment: One requirement was given last year about monitoring production locations in the tail-end. Triaz gave active follow-up.

EVALUATION

Possible Points: 6

Earned Points: 6

RECOMMENDATIONS TO FWF

It would be helpful if FWF was better known. there are opportunities for FWF and brands to work together on this.

Share more best practices and learnings how to approach dilemmas.

The FWF database is not userfriendly and has no benefit for Triaz. FWF has grown in members and staff, IT is not up to date.

In the brand performance check, there could be more attention to innovative projects. Now the approach is to look at indicators and see what happens, but looking from outside what there is, and integrating and rewarding that, is currently missing.

The member hub is a positive development, however, there is more to make exchange possible.

Currently, the FWF membership has added value for the Textile Bundnis membership. Triaz would like to see this the other way around as well, how Bundnis membership can help FWF membership. Or how FWF can profit from it.

SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	42	49
Monitoring and Remediation	32	37
Complaints Handling	7	9
Training and Capacity Building	5	11
Information Management	7	7
Transparency	5	6
Evaluation	6	6
Totals:	104	125

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

83

PERFORMANCE BENCHMARKING CATEGORY

Leader

BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

03-06-2019

Conducted by:

Mariette van Amstel

Interviews with:

Katharina Hupfer, CEO

Martina Becker, Head of disposition and project manager for supplier management

Rebeca Burghart, disposition and supplier manager

Leonardo Langheim, Project manager Brand Development Waschbär/Head of buying department (interim)

Hannah Leicht, Senior Sustainability Coordinator

Joscha Hoffman, Senior Sustainability Coordinator