



## **Brand Performance Check**

### **The Woody Group**

This report covers the evaluation period 01-01-2019 to 31-12-2019

## About the Brand Performance Check

Fair Wear Foundation (Fair Wear) 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. Fair Wear, however, believes that the management decisions of clothing brands have an enormous influence for good or ill on product location conditions.

Fair Wear's Brand Performance Check is a tool to evaluate and report on the activities of Fair Wear's member companies. The Checks examine how member company management systems support Fair Wear'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 Fair Wear 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 Fair Wear 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 Fair Wear'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](http://www.fairwear.org). The online [Brand Performance Check Guide](#) provides more information about the indicators.

# Brand Performance Check Overview

## The Woody Group

Evaluation Period: 01-01-2019 to 31-12-2019

Member company information	
Headquarters:	Gent , Belgium
Member since:	2019-06-01
Product types:	Garments, clothing, fashion apparel
Production in countries where Fair Wear is active:	China, India, Turkey
Production in other countries:	
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	88%
Benchmarking score	46
Category	Good

## **Disclaimer**

*This performance check was conducted amidst the COVID-19 outbreak in 2020. Due to travel restrictions in 2020, the assessment methodology for this check was modified to adapt to an online version.*

*While the performance check does cover all indicators, Fair Wear was not able to cross-check information with the member company's other departments to the extent it would normally do. This may have led to shorter descriptions/comments in the report. We have taken additional measures to ensure the scores are still inclusive and representative of the performance/progress made: more documentation was requested from the member during the preparation phase and other staff members were interviewed to score a specific indicator, where necessary. Furthermore, due to our improved data management system, Fair Wear was able to better track and document progress, mitigating much of the disadvantage of a remote performance check.*

*This modified version was applied consistently to all members' performance checks evaluating the year 2019 in order to maintain fair and comparable data.*

*Fair Wear's performance checks review the progress that was made in the previous financial year. In this case, the 2019 financial year. Thus, this report does not cover the member's response to COVID-19, which will be monitored during the year and evaluated in the next performance check.*

## Summary:

The Woody Group (TWG) has met most of Fair Wear's performance requirements. The company has monitored 88% of its purchasing volume and meets the threshold for first year members. The monitoring percentage, combined with a benchmark score of 46, means that Fair Wear has awarded The Woody Group the 'Good' category.

TWG sources most of its products from its own factory in Turkey, which it had audited at the end of 2019. Besides that, in 2019 it had a small supplier base of 3 suppliers in India and 5 suppliers in China. TWG visits all suppliers on a regular basis and collects existing audit reports where possible. TWG has used the first months of its membership, starting June 2019, to formalise its monitoring and information systems. Fair Wear encourages TWG to continue investing in this.

It is essential that TWG meets the basic requirement of ensuring all production locations sign and return the questionnaire before first orders are placed, including the smaller suppliers. A systematic approach is required to integrate social compliance into normal business processes, and supports good decision-making. The approach needs to ensure that The Woody Group consistently and systematically evaluates the entire supplier base and includes information into decision-making procedures. The Woody Group owns a supplier and therefore is held more accountable for implementing adequate steps when it comes to living wages. The brand is expected to take an active role in discussing living wages with its suppliers and should take steps to work towards living wages.

## 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 Fair Wear's belief that member companies who are making a serious effort to implement the Code of Labour Practices—the vast majority of Fair Wear 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.	94%	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.	4	4	0

**Comment:** The Woody Group (TWG) sources 85% of its products from its own factory in Turkey, where it buys 100% of the production capacity. In addition to that, TWG has two other suppliers where it buys more than 10% of production capacity. This gives TWG a solid basis to work on improving working conditions in their supply chain.

**Recommendation:** Fair Wear recommends The Woody Group to consolidate its supplier base where possible, and increase leverage at main production locations to effectively request improvements of working conditions. It is advised to create a strategy to increase leverage that is agreed upon with top management/sourcing staff.

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.	6%	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.	3	4	0

**Comment:** TWG sources less than 2% of the total production volume at 6 of its 9 suppliers. This is a small tail end, but considering to the small size of its supplier base, the number of tail-end factories is still quite high.

Fair Wear recognises the fact that TWG is a small company which cannot easily increase order volume at one of the tail-end factories. Each of the factories in the tail-end make specific products, which TWG cannot produce in its own factory: accessories such as slippers, shoes, socks and toys. These are not TWG's main product and therefore are ordered in low quantities. TWG does not as of now have any plans to further reduce their tail end because of this specialist nature of these few suppliers.

**Recommendation:** Fair Wear recommends The Woody Group to consolidate its supply base by limiting the number of production locations where TWG has low leverage. To achieve this, The Woody Group should determine whether production locations where they buy less than 2% of their FOB are of strategic relevance. Shortening the tail will reduce the social compliance risks the member is exposed to and will allow the member to improve working conditions in a more efficient and effective way. It is advised to describe the process of consolidation in a sourcing strategy that is agreed upon with top management/sourcing staff. TWG could also consider to increase their leverage by seeking cooperation with other customers.

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.	95%	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:** TWG has been working with its main production partner in Turkey since 2009. Since 2017, TWG is owned by the factory's CEO. As such, TWG and the production facility in Turkey have a very close relationship. TWG has a warm business relationship with the other factories from which they source for more than 5 years. These suppliers are considered partners and visited regularly. TWG considers it in its own best interest to have a long-term relationship with its suppliers. The company finds good relationships with the suppliers is key for trusting them with the production of their garments. However, TWG does not have any policies in place to ensure the maintenance of long business relationships, as most of these contacts have been established in an informal manner.

**Recommendation:** Long term relationships support most aspects of the Code of Labour Practices, and give factories a reason to invest in improving working conditions. It is advised to describe policies regarding the way these long term relationships, which TWG generally has, can be used to improve working conditions. This should be agreed upon with top management/sourcing staff.

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.	No	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.	0	2	0

**Comment:** As TWG became Fair Wear member halfway through 2019, all except one of its production locations received and signed the Code of Labour Practices in 2019. It is important that TWG ensures that also this one supplier in India signs and returns the questionnaire. TWG is planning to have its existing suppliers sign the questionnaire again each year and use this moment as a tool to check in about the CoLP with them.

**Requirement:** The Woody Group needs to ensure that new production locations sign and return the questionnaire before first orders are placed.

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.	Intermediate	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.	2	4	0

**Comment:** In 2019, TWG added one supplier to its supplier base.

TWG does not have a formal system in place to conduct human rights due diligence in new production locations before starting business with them. However, TWG's CSR manager is also in charge of production, and as such social compliance is taken into account in sourcing decisions that she makes. This is done in an unsystematic way, by collecting audits and certifications where possible, and visiting the potential suppliers. Although this is a start, it is now in an ad hoc manner and depending on a few individuals in the company. For this to become standard and sustainable practice, TWG can benefit significantly from formalising these processes.

It should be noted that especially for very small orders of specific products, such as socks, TWG finds it challenging to find any suppliers who are willing to produce them in the quantities they order. This poses a risk, as it can mean that social compliance of the supplier becomes of secondary importance to finding a supplier at all. TWG should keep this in mind when sourcing these products in particular. TWG has developed supplier checklists to evaluate existing suppliers (see also indicator 1.5).

Finally, TWG is not planning to go into any other high-risk production countries in the near future. The company focuses on keeping as much production as possible at their own factory in Turkey.

**Requirement:** A formal process should exist to evaluate the risks of labour violations in the production areas The Woody Group is operating. This evaluation should influence the decision on whether to place orders, how to prevent and mitigate risks, and what remediation steps may be necessary.

**Recommendation:** As TWG indicates it sometimes is a struggle to find suppliers for their smaller orders, the company could consider working with another Fair Wear member for these product groups. Furthermore, to deal with this issue it is advised to use smaller suppliers (to create higher leverage & increase influence) or do very solid risk analysis and due diligence when selecting big factories (so there are few issues that need improvement). TWG could use the supplier checklists for existing suppliers also when selecting new factories.

A risk analysis as part of the decision-making process of selecting new production locations is an important step to mitigate risk and prevent potential problems. Fair Wear recommends The Woody Group to clearly define preventive actions for identified risks and connect them to sourcing decisions. This also includes strategies to tackle structural risks such as low wage levels in the country, limited freedom of association and restricted civil society that are beyond the brand's individual sphere of influence. Fair Wear advises to use information from Fair Wear country studies and wage ladders and use the Fair Wear Health and Safety guidelines. The Woody Group can use the CSR Risk Check (<https://www.mvorisicochecker.nl/en/risk-check>) to further assess the risks in (potential new) sourcing countries. For gender risk assessments, The Woody Group can use the gender-toolkit that has fact-sheets per country, supplier checklists and a model policy on Sexual Harassment. The Woody Group can cooperate with local stakeholders to further investigate the situation in a specific country, particularly with regards to the Sumangali scheme in India. Fair Wear can offer information on local stakeholders.

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	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.	1	2	0

**Comment:** In 2019, TWG evaluated all suppliers after each season in an informal manner. In an important effort to formalise this more, TWG created a supplier database which includes compliance of the suppliers on each of the Fair Wear Labour standards. In this database, the company can keep track of the production locations' compliance with the Code of Labour Practices. In 2019, this has not yet led to production decisions, but it is designed to be able to do so in the future. TWG has created supplier checklists based on the Fair Wear supplier checklist for each of the countries they source from. The suppliers are asked to fill out these checklist every year, so TWG can use them as a basis for yearly check-in on possible changes. The checklist includes requests for photos and questions related to country-specific risks, such as the Sumangali scheme in India.

TWG ended the relationship with two suppliers before the company started Fair Wear membership in 2019. At that time there was not a formal exit strategy in place. TWG was sourcing a very small part of the production volume (<2%) at these suppliers and their exit is not likely to have affected jobs at these facilities. Still, extensive dialogue with the factory management took place before the relationship was ended, for which one factory manager visited Belgium. In the end the decision was made primarily for quality reasons. TWG is planning to work on a responsible exit strategy to formalise such processes. TWG has not rewarded any of its suppliers which they believe perform exceptionally well in 2019. As they are a small company, rewarding one supplier with extra production would mean taking away production elsewhere. TWG does not want to work that way and rather invests in dialogue with suppliers which are not performing well.

**Recommendation:** - Fair Wear encourages The Woody Group to implement a responsible exit strategy and make sure all relevant staff is informed about this. Please see Fair Wear's guidelines on a responsible exit strategy. - <https://members.fairwear.org/resources/responsible-exit-strategy/5>.

- As it is not always possible to reward suppliers with more volumes, The Woody Group could look into other incentives that reward supplier's commitment towards the CoLP. An example would be to offer training for skill building/capacity development, placing more NOS styles.

- Fair Wear recommends The Woody Group to share and discuss the outcome of the supplier evaluation with all its suppliers. Furthermore, Fair Wear recommends The Woody Group to consider how it can stimulate progress on social issues, for example by offering price increases, bonuses or financial support to resolve issues.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.6 The member company's production planning systems support reasonable working hours.	General or ad-hoc system.	Member company production planning systems can have a significant impact on the levels of excessive overtime at production locations.	Documentation of robust planning systems.	2	4	0

**Comment:** TWG works with two seasons, autumn/winter and spring/summer. The collections are ordered every year at the same time, allowing the long-term suppliers to plan ahead for these orders. TWG's main product, pyjamas, is not a complex product to make. The repetition of very similar styles throughout the year adds to efficient working processes. Additionally, NOS-styles such as underwear are spread over the low season. Samples are always done in all colours in which they will also be needed to produce, because different coloured fabrics can react differently when sewing. This makes it less likely for problems to come up during the actual production. TWG's customers are mostly B2B, which place orders before the production starts based on these samples. Thanks to this set-up, it is very rare any design changes or technical changes take place during the main production.

Furthermore, TWG works with a forecasting system which looks at data from previous sales and based on these statistics of the past 25 years can accurately foresee what is likely to be needed in the upcoming future. TWG and their main production facility in Turkey, where they produce 85% of their FOB, have a joint system where they then do the planning based on these forecasts. In this system, TWG has direct insight in the capacity of the factory. The expected dispatch date can directly be accessed by the customers once the factory inputs the information. All these elements contribute to TWG's system supporting regular hours of work, however, still some excessive overtime occurs in this factory (see 1.7).

At the other facilities than their own, the orders are small and therefore usually it is not an issue to find the capacity.

If for any reason the orders cannot be dispatched on time, TWG accepts this as it is, and looks for other ways to make sure the orders are delivered on time. In 2019 they used air transport instead of boat, for example.

**Recommendation:** It is recommended to ensure that the systems TWG has in place, which are suitable to support reasonable hours of work, are also actively used for this purpose. To do that, Fair Wear recommends The Woody Group to learn more about the standard minute per style and how the production of its products impacts the total production capacity of the factory. This is recommended also for the other facilities than the Turkish one.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.7 Degree to which member company mitigates root causes of excessive overtime.	Insufficient 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.	0	6	0

**Comment:** The audit at TWG's own facility in Turkey, shows excessive overtime (beyond the legally allowed overtime) occurs in the factory in a limited amount of cases. As it is its own factory, Fair Wear finds it is TWG's responsibility to take this seriously even if it is only a limited amount of cases, and investigate the root causes. The issue has been discussed with TWG's CEO, who is also the owner of the factory. He is very willing to remediate this issue. This is a good start, however TWG should investigate why this occurs at their factory. For example, since overtime pays more than regular time, this could be an indication that regular wages are not sufficient for all staff.

It should be noted that since TWG became a Fair Wear member halfway through the year, the audit took place at the end of 2019. This means time to follow up on these findings in 2019 has been limited.

**Requirement:** The Woody Group should investigate to what extent its current buying practices has an effect on the working hours at supplier level. A root cause analysis of excessive overtime should be done to investigate which steps can be most effective to reduce overtime.

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.	Insufficient	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.	0	4	0

**Comment:** TWG does not have insight in the link between their buying prices and the wages at production locations. The factory in Turkey has a general idea of the cost breakdown of their products. As the CEO of the factory is also the CEO of TWG, it is the assumption that the prices of the products are sufficient to pay for the wages. It should be possible to get more detailed insight in the link between prices and wages and TWG has indicated that this is something they want to work on in 2020. Notably, it is TWG's policy not to negotiate with other suppliers. The company simply accepts the price the supplier gives and trusts the supplier to ask for a price that can cover the wages. The shop prices are decided based on the price at the factory. As such, TWG has out of principle incorporated a form of 'bottom-up costing' in its business. This is a promising basis from which to work on getting more insight in the relationship between these prices and the wages at the factory.

**Requirement:** Since The Woody Group owns a supplier, The Woody Group should be able to demonstrate the link between its pricing and the wage levels at this supplier.

**Recommendation:** Fair Wear recommends TWG to expand their knowledge of cost breakdowns of all product groups. A next step would be to calculate the labour minute cost of its products to calculate the exact costs of labour and link this to their prices. TWG can use the Fair Wear labour minute and product costing tool to do this.

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

**Comment:** There were no cases found where legal minimum wages were not paid.

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

**Comment:** TWG always pays 30% in advance to its suppliers in India and China. The orders can only be shipped into Belgium once they are fully paid. Proof of full payment has to be shown at customs. There are no findings of TWG not paying on time. For the Turkish supplier, as the factory CEO is also TWG's CEO, payments are always done on time upon request of the CEO.

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.	Insufficient	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	0	6	0

**Comment:** As a first-year member who joined only halfway 2019, TWG has not yet been able to dive into the complex topic of living wages. Since TWG owns their own factory, Fair Wear does expect them to actively take this up with the supplier in Turkey in 2020. TWG also indicated wanting to work on this, using the Fair Wear labour minute and product costing tools.

**Recommendation:** The Woody Group owns a supplier and therefore is held more accountable for implementing adequate steps. The member is expected to take an active role in discussing living wages with its suppliers and should take steps to work towards living wages. TWG is strongly recommended to participate in the Living Wage Incubator working group for brands with wholly-owned facilities.

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).	86%	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.	2	2	0

**Comment:** TWG and its main factory fall both under the same CEO Mehmet Batur. TWG tries to source as much as possible from this location.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.13 Member company determines and finances wage increases.	None	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.	0	6	0

**Comment:** Being a new member, TWG has not yet been able to determine and finance any wage increases. Some informal discussion about it with the factory took place and the CSR team made an overview of the living wages in the regions where they are sourcing, using the website [www.wageindicator.org](http://www.wageindicator.org). This is a first step towards identifying the wage gap at their factories.

**Recommendation:** TWG is strongly recommended to analyse what is needed to increase wages and develop a strategy to finance the costs of wage increases together with their own factory in Turkey. TWG can refer to the Fair Wear wage ladder for information on the living wage estimates in the countries where they are sourcing. TWG's business model shows a lot of potential to effectively increase wages, because the main supplier and TWG are owned by the same CEO. TWG is advised to use this relationship to determine and finance wage increases in partnership with the factory.

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.	0%	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.	0	6	0

**Comment:** Being a new member, TWG has not yet set a target wage for any of its production locations. The CSR team has done some initial research into possible wage benchmarks using [www.wageindicator.org](http://www.wageindicator.org).

**Recommendation:** TWG is strongly recommended to begin setting a target wage for its production locations, in particular for its own facility in Turkey, because this is where they can make a big impact. TWG can use the Fair Wear living wage policy and Wage Ladder to set this target wage. It is advised TWG audits other factories in order to verify the wage levels there.

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## Purchasing Practices

**Possible Points: 52**

**Earned Points: 18**

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## 2. Monitoring and Remediation

Basic measurements	Result	Comments
% of production volume where approved member own audit(s) took place.	0%	
% of production volume where approved external audits took place.	86%	
% of production volume where Fair Wear audits took place.	2%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.	0%	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.)
% of production volume where an audit took place.		
Member meets monitoring requirements for tail-end production locations.	First or second year member and tail-end monitoring requirements do not apply	1st or 2nd year member and tail-end monitoring requirements do not apply.
Requirement(s) for next performance check		
Total monitoring threshold:	88%	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:** The CSR and production manager has this as part of her tasks. She is supported by the CSR intern.

**Recommendation:** Fair Wear recommends TWG to ensure that the CSR team keeps sufficient capacity available to address the problems identified by the monitoring system, including the more arduous administrative aspects of Fair Wear membership.

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:** The audit report and CAP were shared in both English and Turkish with the factory. The report showed need for worker involvement, and TWG asked the factory to share the report with the worker representatives.

TWG discussed with the factory what is an appropriate time-frame for follow up on the CAPs based on the report and what is workable for the factory. Special attention was paid to things that can be changed immediately. More in-depth discussion of the CAPs will be done in-person and has not been scheduled to take place yet because of the Covid-19 pandemic. TWG does not document the timeframe which is set together with the factory.

**Recommendation:** Before an audit takes place, The Woody Group is recommended to check with the supplier whether worker representatives are active. In this way, they can be involved from the start of an audit and be invited for the audit opening and exit meeting. Including workers when following up on audit reports gives them the opportunity to be informed of issues in the factory and have a voice in the prioritization of issues. TWG could invest in documenting systematically the time-line they set with their factories for CAP follow-up.

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.	Basic	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.	4	8	-2

**Comment:** As the audit in the Turkish factory was done at the end of 2019, TWG has had limited time to address the CAP in 2019. However, TWG has followed up immediately after the audit took place with the factory. Any CAPs that could be resolved immediately, for example the changing of the location of the complaints' box, were remediated still in 2019. More substantial CAP findings, such as the lack of certain written policies, were planned to be taken up in 2020. The CEO of the factory, being the CEO of TWG as well, has a direct role in remediation of CAPs.

Nevertheless, a system to keep track of progress is lacking and is something TWG should invest in.

**Recommendation:** To facilitate remediation, The Woody Group could consider:

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

Fair Wear encourages The Woody Group to continue strengthening their system to analyse how they might have contributed to findings and what changes they can make in their purchasing practices. Furthermore, TWG should do root-cause analysis for complex CAP findings, such as the finding of excessive overtime and any findings related to freedom of association.

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.	100%	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:** The owned factory in Turkey is visited by TWG's CEO every two weeks. Additionally, the CSR & production manager visits all production locations every year.

**Recommendation:** TWG can still invest in documenting the outcomes of these visits in a more systematic way, so they can be shared more easily with other colleagues. TWG should make sure to also keep visiting factories which only produce small quantities for them.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.6 Existing audit reports from other sources are collected.	Yes	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.	1	3	0

**Comment:** TWG asks for existing audit reports from other sources at their suppliers. In 2019, this led to the collection of one audit report from one of their Indian suppliers. However, as this report was only sent to them in Hindi, they have not been able to assess quality using the Fair Wear Quality Assessment Tool and have not been able to implement any corrective actions.

TWG plans to have their suppliers audited in the coming year.

**Recommendation:** Existing reports form a basis for understanding the issues and strengths of a supplier, and reduces double work. Existing audits can be counted towards the monitoring threshold if the quality of the report is assessed using the Fair Wear audit quality tool and corrective actions are implemented.

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	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on risks related to Turkish garment factories employing Syrian refugees	Advanced			6	6	-2
Other risks specific to the member's supply chain are addressed by its monitoring system	Intermediate			3	6	-2

**Comment:** TWG's factory in Turkey is located in an area where very few Syrian migrants appear to be present. TWG has done a risk assessment regarding this topic and found 0.6% of the Syrian refugees in Turkey are located in this area. At the moment, no Syrian refugees are working in the factory. Nevertheless, TWG and the factory have drafted a policy regarding the employment of migrant workers based on the Fair Wear guidance on Syrian migrant workers in Turkey. The policy stresses the importance not to discriminate against Syrian workers and includes steps to take in case undocumented workers are found. The factory knows how to support such workers in the process of obtaining a working permit. Furthermore, the factory has system in place to do a thorough documents check for new employees. TWG supplier checklist includes questions regarding migrant workers as well. The factory has not made use of subcontractors in 2019.

TWG sources from Tamil Nadu, India, which is known for risks relating to the Sumangali scheme. TWG is aware of this risk, they have read country studies and attended webinars. TWG takes this into account during their yearly visits to the factories. For example, in the supplier checklist for India, questions are included about the existence of sleeping facilities in the factory. However, TWG finds it challenging to verify whether their findings here are correct. TWG plans to do an audit at their most important Indian supplier in 2020, so they can further investigate the issue.

**Recommendation:** Knowing the country specific risks facilitates the starting point for discussing this with suppliers. Member companies can agree on additional commitments that are required to mitigate risks. TWG should make sure a system is in place to keep track of the risks in the countries where they source. In case the situation in countries changes, this should be incorporated into the supplier checklist, for example.

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:** TWG requested the audit report for its Indian supplier which had been done in 2017 for another Fair Wear member. As the CAP was considered to be quite outdated, TWG decided to schedule another audit for this factory together with the other member so the companies can work on any issues in this factory together. There are no audits at other shared suppliers.

**Recommendation:** Fair Wear recommends TWG to stay in active contact with the respective member once this audit has taken place. Even though one brand commonly takes the lead it is important to be kept informed of the status in order to be aware of required implementation steps before communication with or visits to the factory.

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.	No production in low-risk countries	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.	N/A	3	0

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).	No	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.	N/A	2	0

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.	No external brands resold	FWF believes it is important for affiliates that have a retail/wholesale arm to at least know if the brands they resell are members of FWF or a similar organisation, and in which countries those brands produce goods.	Questionnaires are on file.	N/A	2	0

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).	No external brands resold	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.	N/A	3	0

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: 27**

**Earned Points: 20**

### Additional comments on Monitoring and Remediation :

TWG has taken important steps in setting up a system for monitoring in the first months of their membership. Fair Wear encourages TWG to continue on this road and keep formalising these processes. TWG is especially encouraged to pay attention to working conditions in that process.

### 3. Complaints Handling

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.1 A specific employee has been designated to address worker complaints.	Yes	Followup is a serious part of FWF membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	1	1	-1

**Comment:** The Woody Group's CSR manager, is responsible to address worker complaints. She is supported by the CSR intern.

**Recommendation:** It is recommended to ensure enough capacity remains available for the Fair Wear membership.

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.	No	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:** The Worker Information Sheet is not posted in one of the Indian factories. Another Indian factory did not return a picture of the posted CoLP, although the sheet was posted as other FWF members are active in this factory. TWG did request the factory to also put up their WIS but the factory has not done so. TWG includes in its supplier checklist the request for photos of the WIS being posted in the factory.

**Requirement:** The Woody Group must ensure that the Worker Information Sheet, including contact information of the local complaints handler of Fair Wear, is posted in factories in a location that is accessible to all workers. Member company should check by means of a visit whether the Worker Information Sheet is posted in the factories.

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.	0%	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.	0	6	0

**Comment:** In the first 7 months of its membership, TWG has not yet had the opportunity to implement any training programmes at their suppliers. TWG is looking into the possibility of doing this in 2020. TWG has also not yet implemented any other activities to raise awareness of the CoLP at the suppliers. The suppliers are required to go through the factory guide, and the CEO of the Turkish factory has an account on the Fair Wear Member Hub as well.

**Requirement:** Fair Wear requires members to actively raise awareness about the Fair Wear Code of Labour Practices and Fair Wear complaint hotline. The Woody Group should ensure good quality systematic training of workers and management on these topics. To this end members can either use Fair Wear's Workplace Education Programme (WEP) basic module, or implement training related to the Fair Wear CoLP and complaint hotline through service providers or brand staff. Fair Wear's guidance on training quality standards is available on the Member Hub.

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: -1**

## 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:** TWG is not a big company and as such it is quite easy to keep everyone informed. At the start of the Fair Wear membership, a presentation for all TWG staff introducing them to the Fair Wear membership was done. Fair Wear was also included in the staff presentation regarding the 2020 strategy. Furthermore, the membership is discussed in regular monthly management meetings at TWG.

**Recommendation:** It is advised to develop a standard procedure for all new employees to get familiar with Fair Wear membership. Fair Wear has material available that can be used to inform (sales) staff.

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 involved in production which have a lot of direct contact with the suppliers are the CSR manager, her supporting colleague and the planning manager. They are all directly involved in the Fair Wear membership and fully aware of all requirements.

In addition to this, TWG has created country-specific supplier checklists for staff to use when visiting suppliers. These checklists include specific instructions for photos at the production locations and questions related to country-specific risks. In 2019 the planning and production/CSR managers took these checklists on her visit to China and India.

At TWG, other employees, whose work is not directly related to the production process (communication & marketing for example), are encouraged to visit the Turkish factory for information/learning purposes.

**Recommendation:** TWG is advised to create short briefings for non CSR staff members visiting factories about Fair Wear requirements. Fair Wear encourages purchasing staff or agents to observe factory audits conducted by the Fair Wear audit teams to learn about the audit process and to be able to better follow up on corrective action plans.

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:** TWG works with an agent for one factory. This agent is actively informed about the CoLP and has ensured the supplier signed the questionnaire and put the WIS in a visible place in the factory. From correspondence with this agent it is clear that they are very cooperative and willing to be involved in further CoLP implementation.

**Recommendation:** Fair Wear recommends the member to actively train their sourcing contractors/agents on monitoring and remediating problems and enable them to support the implementation of the CoLP.

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:** TWG has not yet been able to implement training on transformative processes related to human rights, as the company focused the first months of their membership on the more basic aspects of the Fair Wear membership.

**Recommendation:** The audit in the factory in Turkey shows that worker involvement is a point of attention. Therefore, Fair Wear recommends The Woody Group to implement training programmes that support factory-level transformation on this topic such as establishing functional internal grievance mechanisms, improving worker-management dialogue and communication skills. To this end, members can make use of Fair Wear’s Workplace Education Programme communication or implement advanced training of worker representatives through service providers, trade unions or brand staff. Fair Wear guidance on good quality training is available on the Member Hub. Training assessed under this indicator should go beyond raising awareness and focus on behavioural change and long-term structures to improve working conditions.

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.	Intermediate	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.	3	6	-2

**Comment:** TWG has a small supplier base and the vast majority of the production volume is at its own supplier in Turkey. As TWG owns this factory it is easy to keep track of any subcontracting taking place (which is not the case). Except for one supplier in China where an agent is used, TWG is in direct contact with all suppliers. There is a system in place where all suppliers are listed, which includes information about the occurrence of subcontracting, as well as information on all other CoLPs per supplier. The TWG Code of Conduct states that in case subcontractors are used, they need to receive the Code of Conduct as well. The business contracts with the suppliers do not include a provision on the use of subcontractors. TWG checks whether any of their orders are subcontracted during their visits at the production locations. Although this is a good practice, it is still quite ad-hoc, and it is a risk some subcontracting may take place when TWG is not at the location.

**Recommendation:** Members are advised to develop a systematic approach to complete the production location list. Part of the approach can be:

1. Automatically include information from the questionnaire, audit reports and complaints
2. Business relationships with agents include transparency of production locations.
3. Agreements with factories on the use of subcontractors stating clearly that when subcontractors are used, they are included in the monitoring system and information is shared on the subcontracted production process.

Fair Wear recommends the member to require agents to be informed about the production location before the order starts.

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:** TWG is quite a small company, which makes it easy to share relevant information among all relevant staff. It is very helpful that the CSR manager is also the production manager, who works very closely with the planning manager. The audit report of the Turkish factory was discussed with the whole team at TWG, including the company's general manager. It was then also discussed with the CEO of the factory & TWG. Staff visiting production locations in 2019 were asked to take pictures and were informed about which specific things to pay attention to via e-mail. TWG could invest in making this more standard, as it is now happening on an irregular basis and also depends on informal chats.

**Recommendation:** It is advised to make relevant staff aware of the available tools Fair Wear offers, such as the Health and Safety guides, monitoring CAP documents, access to Fair Wear's online information system. Purchasing staff are recommended to share reports from factory visits that include a status update of implementing the CoLP.

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## Information Management

**Possible Points: 7**

**Earned Points: 4**

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### Additional comments on Information Management :

TWG has invested a lot in this specific topic since the start of their membership. They are working hard to take the whole organisation along in this organisational change and change of working culture, moving away from informal processes to more standardised processes. TWG considers this very important as a basis for a sustainable future as a business and also as a Fair Wear member.

## 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:** TWG meets the communication requirements and is in line with the Fair Wear communication guidelines.

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:** TWG does not have a brand performance check to publish yet, but has included the audit findings at their Turkish supplier in the social report which is published on their website. TWG has opted in for the Fair Wear transparency policy in 2019 but is still in the process of receiving consent from all suppliers in order to be able to publish a supplier list.

**Recommendation:** Fair Wear recommends The Woody Group to publish one or more of the following reports on its website: the Brand Performance Check report, audit reports, supplier information. Good reporting by members helps to ensure the transparency of the member and Fair Wear's work.

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:** TWG wrote a detailed report including the audit findings of their most important supplier and published this on their B2B website.

## Transparency

**Possible Points: 6**

**Earned Points: 5**

### Additional comments on Transparency :

TWG wants to continue to work towards more transparency and wants to show that it is possible to be completely honest about what you do.

## 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:** As 2019 was TWG's first half year of membership, annual evaluation has not yet taken place. However, after the first brand performance check, its outcomes as well as the Fair Wear membership will be evaluated with all managers at TWG. The brand performance check is used to create future plans and will be used as input for the next work plan.

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.	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.	Member company should show documentation related to the specific requirements made in the previous Brand Performance Check.	N/A	4	-2

**Comment:** This is the first brand performance check for TWG.

## Evaluation

**Possible Points: 2**

**Earned Points: 2**

## Recommendations to Fair Wear

The Woody Group started its Fair Wear membership with a lot of enthusiasm in June 2019. The CSR team soon found out it required a lot of effort to get into all the Fair Wear materials, which was a bit overwhelming. TWG recommends Fair Wear to consider using more accessible language in publications and policies. TWG finds the complex nature of some of Fair Wear's tools and documents slowed them down in setting up the membership. TWG would like it if some of Fair Wear's content would be translated in a way that it can be communicated to the workers in the factory as well.

## Scoring Overview

Category	Earned	Possible
Purchasing Practices	18	52
Monitoring and Remediation	20	27
Complaints Handling	-1	9
Training and Capacity Building	5	11
Information Management	4	7
Transparency	5	6
Evaluation	2	2
Totals:	53	114

### Benchmarking Score (earned points divided by possible points)

46

### Performance Benchmarking Category

Good

## Brand Performance Check details

Date of Brand Performance Check:

13-05-2020

Conducted by:

Paula de Beer

Interviews with:

Nelle Matthyse & Ieva Roze