



Brand Performance Check

Anna van Toor

Publication date: July 2020

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

Brand Performance Check Overview

Anna van Toor

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

Member company information	
Headquarters:	Meerkerk , Netherlands
Member since:	2013-01-31
Product types:	Garments, clothing, fashion apparel
Production in countries where Fair Wear is active:	Bulgaria, China, India, Tunisia, Turkey
Production in other countries:	Lithuania, Madagascar, Pakistan, Poland, Portugal, Serbia
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	79%
Benchmarking score	55
Category	Good

Disclaimer

This modified version was applied consistently to all members' performance checks starting their financial year in 2019 in order to maintain fair and comparable data.

Fair Wear will evaluate the members' response to the Corona-crisis in the performance check about the financial year starting in 2020. For members having financial years starting in April or later, parts of their response can already be reflected in the current performance check report, although their overall response will be evaluated in the next performance check.

Summary:

Anna van Toor has met most of Fair Wear's performance requirements. The brand monitored 79% of its total purchasing volume using Fair Wear audits, external audits and fulfilling monitoring requirements for low-risk locations. This is below the 80% required of brands in 3+ years of membership. This is partially due to the fact that Anna van Toor has not audited their locations in Serbia as they assumed they would fall under low risk monitoring requirements. Anna van Toor could however demonstrate monitoring efforts at the locations. In light of this and with their benchmarking score reaching 55 points, Fair Wear has awarded a good rating.

Anna van Toor has a monitoring system in place and audited its main Turkish production locations. However, its agent switched orders accounting for 13% of its production volume to another location without informing the brand beforehand. Therefore, no audit could be conducted in 2019. Previous checks have highlighted similar issues for other countries. Fair Wear requires Anna van Toor to ensure the Fair Wear questionnaire is signed before the first bulk orders are placed. Fair Wear also recommends the brand to further strengthen its monitoring and risk management systems and ensure agents fully understand Fair Wear's approach.

During 2019, Anna van Toor started to analyse wage levels. Fair Wear encourages Anna van Toor to continue its efforts, link its buying price to wage levels, agree on a target wage with suppliers and worker representatives and finance its share of this target wage.

Anna van Toor received three complaints during 2019. As its leverage at the location was small, another Fair Wear brand took the lead in addressing these complaints and updated Anna van Toor regularly. One supplier participated in Fair Wear training on worker rights and complaint mechanisms. Fair Wear recommends Anna van Toor to actively raise awareness of these points among more suppliers.

Fair Wear recommends Anna van Toor to ensure they have sufficient staff capacity available to implement the Fair Wear Code of Labour Practices and participate in training and guidance opportunities offered by Fair Wear to be fully aware of membership requirements.

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.	49%	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.	2	4	0

Comment: In 2019, Anna van Toor bought 49% of its production volume from production locations where the brand buys at least 10% of the production capacity. Anna van Toor's main suppliers are located in Turkey, Portugal, Poland, and China. The company tries to place orders at existing suppliers as much as possible. In order to supply the constantly changing customer demand, Anna van Toor does need to introduce new products and new materials from time to time. When the current suppliers cannot make these new products, a new supplier needs to be added to the supplier list.

Recommendation: Fair Wear recommends Anna van Toor 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 describe the process of consolidation in a sourcing strategy 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.	14%	Fair Wear 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 Fair Wear.	2	4	0

Comment: In 2019, 14% of Anna van Toor's production volume came from production locations where the brand buys less than 2% of its total production.

Recommendation: Fair Wear recommends Anna van Toor to consolidate its supply base by limiting the number of production locations in its 'tail end'. To achieve this, Anna van Toor 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.

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.	53%	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.	3	4	0

Comment: In 2019, 53% of Anna van Toor's production volume came from production locations where a business relationship exists for at least five years.

Recommendation: Fair Wear recommends Anna van Toor to maintain stable business relationships with suppliers. 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 maintaining long term business relationships in a sourcing strategy that is 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: Anna van Toor works with an overview sheet of its suppliers, including a column on whether the questionnaire with the CoLP is signed and returned. The brand stores the questionnaires in folders per supplier on its server. All questionnaires are on file, except from one factory in Turkey. Their Turkish agent had shifted orders to this new location without informing Anna van Toor beforehand.

Requirement: Anna van Toor 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: When selecting new production facilities, Anna van Toor mainly relies on its existing network of production locations, agents and employees. This means it mainly focuses on producing in countries where the company already knows the human rights and labour situation.

In 2018, Anna van Toor introduced a roadmap for adding new suppliers. The roadmap includes the following steps: 1. Is the factory suitable? (among other points, assessing the capacity, audit reports, and other Fair Wear members sourcing), 2. Inform factory about Anna van Toor's guidelines (Anna van Toor's manual, Worker Information Sheet, and the Fair Wear Questionnaire), 3. All information should be received and signed within one month (all documents of step 2 should be signed and send back, or posted in the factory), 4. Visit the factory by Anna van Toor or agent (Health and Safety check supported by pictures), 5. Analyse audits and follow-up (Fair Wear or BSCI audits).

Part of step 1 is reading the Fair Wear country study. Anna van Toor started to make summaries of the country studies to make these more accessible for its production staff. The Head of Production and the Production and Design Manager have the final say in whether a new supplier is added or not. This decision is influenced by evaluating the first three steps the roadmap for adding new suppliers.

In 2019, Anna van Toor added two new location in Serbia linked to an existing supplier. The cooperation is organised through a Dutch agent who visits the site frequently. Anna van Toor has also visited both sites themselves in 2019. As described under 1.3, one Turkish location received orders accounting for 13% of Anna van Toor's production in 2019 without Anna van Toor being informed by their agent prior to production. The agent had looked for a replacement after another Turkish location that had been audited by Fair Wear terminated the relationship with Anna van Toor. According to the agent, he discussed working conditions with the supplier and observed changes in wage payments and health&safety before placing orders. Anna van Toor has discussed with the agent that they need to be informed about changes in production location before orders are placed.

Recommendation: Fair Wear recommends Anna van Toor to ensure that agents cannot select and place production at new production locations before Anna van Toor has completed the human rights due diligence process. Fair Wear recommends to put this agreement with the intermediary platform in writing.

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.	No	A systemic approach is required to integrate social compliance into normal business processes, and supports good decisionmaking.	Documentation of systemic approach: rating systems, checklists, databases, etc.	0	2	0

Comment: Anna van Toor works with an overview of all its suppliers, including formal and informal audit dates, training dates, whether the supplier has been visited, the questionnaire has been sent back, and the worker information sheet has been posted. During 2019, Anna van Toor also integrated brief information about the current status of collaboration regarding improving working conditions in the overview. While Anna van Toor does not have a formal supplier evaluation in place, they have regular discussions on order placements. Quality of orders is a key factor in the decision to place orders.

Requirement: A systematic approach is required to integrate social compliance into normal business processes and supports good decision-making. The approach needs to ensure that the member consistently evaluates the entire supplier base and includes information into decision-making procedures.

Recommendation: Fair Wear encourages Anna van Toor to develop an evaluation/grading system for suppliers where compliance with labour standards is a criterion for future order placement. Part of the system can be to create an incentive for rewarding suppliers for realised improvements in working conditions. Such a system can show whether and what information is missing per supplier and can include outcomes of audits, trainings and/or complaints.

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: Anna van Toor places monthly orders at its suppliers, which means the brand spreads the pressure it puts on production and places orders during low season. In the meantime, it is able to meet the customers' demand for more collections. When Anna van Toor selects a new supplier it requests information about the supplier's capacity and will not over-ask this capacity. When a relatively large order will be placed, Anna van Toor pro-actively checks with the supplier whether it is able to meet the lead time. Lead times are based on previous experience that suppliers need on average 3-4 weeks for production after everything is approved and all needed materials are in-house. In practice, this means that for production, lead times are set between 3.5 and 4 months. For a part of its suppliers, Anna van Toor buys the fabrics, for these suppliers lead time is shorter. Anna van Toor takes holidays into account when placing orders.

In 2017, Anna van Toor started with a salesman sample collection, which means that the brand starts with the production process earlier and is able to inform suppliers more in advance when production needs to take place. In this way, suppliers are able to plan more ahead. Because of an increased focus and more time for the development process and better communication between styling and production, fewer changes in design are needed after placing the orders.

In case of delays, Anna van Toor tries to understand the cause of the delay and to work towards a suitable solution, e.g. by extending the delivery date for (part of) the order. In general, Anna van Toor communicates openly with its suppliers about lead times and (potential) delays.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.7 Degree to which member company mitigates root causes of excessive overtime.	Intermediate 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.	3	6	0

Comment: Several audits conducted at factories where Anna van Toor sources documented cases of excessive overtime. For one factory, Anna van Toor had overlooked the audit report and hence had not followed up. Another audit was conducted at the end of their financial year, follow up in 2020 will be assessed in the 2021 performance check. For other causes, Anna van Toor did raise the issue with suppliers during audit follow up, but has not conducted a root cause analysis to determine the cause of overtime. For one supplier, Anna van Toor could demonstrate that the factory had established a formal system to track working hours as a step to control excessive overtime.

Recommendation: Anna van Toor could discuss with factory management on the causes of excessive overtime and provide support to manage overtime. If necessary, Anna van Toor could hire local experts to analyse root cause of excessive overtime in cooperation with the supplier. Fair Wear could recommend qualified persons upon request. Fair Wear recommends cooperating with other customers at the factory to increase leverage, when trying to mitigate excessive overtime hours.

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: Anna van Toor does not negotiate on price but relates prices to prices of similar styles in the past without insight into the share that is used to cover labour costs. When the price given by the supplier is not meeting the target price of Anna van Toor, a solution is usually found by changing the details of a design or using cheaper fabrics. In 2019, Anna van Toor started systematically collecting and comparing wage levels at all its factories. All factories were at least paying legal minimum wages.

Requirement: Anna van Toor needs to demonstrate an understanding of the link between buying prices and wage levels, to ensure their pricing allows for the payment of the legal minimum wage.

Recommendation: Fair Wear recommends Anna van Toor to expand their knowledge of cost break downs of all product groups. A next step would be to calculate the labour minute costs of its products to be able to calculate the exact costs of labour and link this to their own buying prices. First priority would be to make sure this level of transparency can be achieved with their suppliers.

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.	Yes	If a supplier fails to pay minimum wage or minimum wage payments cannot be verified, Fair Wear 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, Fair Wear Audit Reports or additional monitoring visits by a Fair Wear auditor, or other documents that show minimum wage issue is reported/resolved.	0	0	-2

Comment: No payment below legal minimum wage was documented.

However, Fair Wear did document cases where wage levels were either not transparent or other legal provisions were not granted to all workers.

In one audit, Fair Wear found that some workers were not covered by legally required social security. Anna van Toor raised this issue with their agent, who denied the issue. The brand could not demonstrate further follow up on this matter.

For another factory, the audit report was only received at the end of the financial year. Follow up will be assessed during the 2021 Brand Performance Check.

Recommendation: Fair Wear strongly recommends Anna van Toor to always verify whether legal minimum wage issues and issues around other legally required provisions have actually been resolved in case factory management claims so. Anna van Toor could hire a local consultant or plan a monitoring visit of one of Fair Wear's auditors to check whether the issue has actually been resolved.

Fair Wear also recommends to ensure agents understand Fair Wear's approach including how conclusion in audits are reached and support Anna van Toor in resolving issues.

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.	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	4	6	0

Comment: In 2019, Anna van Toor created a living wage plan. As a first step, all active suppliers were informed about Anna van Toor's commitment to payment of a living wage and were asked to share the wage of the lowest paid worker in their factory for a regular working week. This data, together with verified data from Fair Wear audits, was compared with available legal minimum wage and living wage benchmarks. Based on this, Anna van Toor selected two suppliers that are not yet paying a living wage with whom they have a close relationship. As a next step, the brand plans to engage further with these suppliers to understand how their buying price links to wages at the factory and what steps they can take to increase wage levels.

Recommendation: Fair Wear encourages Anna van Toor to continue their living wage plan and discuss with suppliers about different strategies to work towards higher wages. Wages below living wage estimates caused by internal processes of member companies should be identified and prevented in the future. An assessment should also be made of other factors influencing wages.

It is advised to start with suppliers where the member is responsible for a large percentage of production and long term business relationship.

Fair Wear encourages Anna van Toor to involve worker representatives and local organisations in assessing 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).	None	Owning a supplier increases the accountability and reduces the risk of unexpected CoLP violations. Given these advantages, this is a bonus indicator. Extra points are possible, but the indicator will not negatively affect an member company's score.	Supplier information provided by member company.	N/A	2	0

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: Until now Anna van Toor has not yet determined the increase needed to bring all wages to the level of a living wage benchmark.

Requirement: Anna van Toor should analyse what is needed to increase wages and develop a strategy to finance the costs of wage increases.

Recommendation: To support companies in analysing the wage gap, Fair Wear has developed a calculation model that estimates the effect on FOB and retail prices under different pricing models.

It is advised that the strategy for how to finance wage increases is agreed upon by top management.

In determining what is needed and how wages should be increased, it is recommended to involve worker representation.

Fair Wear advises companies to avoid the concept of a one-time charitable contribution. We 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.	0%	Fair Wear 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: Anna van Toor's own analysis showed that the lowest wage paid at several of their suppliers does meet the lower range of some living wage benchmarks (for a single adult, not family estimates). Not all data has been verified by Fair Wear.

Recommendation: Fair Wear encourages Anna van Toor to show that discussions and plans for wage increases have resulted in the payment of a target wage.

Purchasing Practices

Possible Points: 52

Earned Points: 20

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.	11.54%	
% of production volume where Fair Wear audits took place.	21.1%	
% of production volume where an audit took place.	32.6%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.	46.5%	To be counted towards the monitoring threshold, FWF low-risk policy should be implemented. See indicator 2.g. (N/A = no production in low risk countries.)
Member meets monitoring requirements for tail-end production locations.	No (implementation will be assessed next performance check)	FWF members must meet tail-end monitoring requirements. Implementation will be assessed during next Brand Performance check.
Requirement(s) for next performance check	In the tail end of Anna van Toor's supplier base, Fair Wear requires Anna van Toor to ensure it audits all production locations that: <ul style="list-style-type: none"> • Produce more than 2% of the member's volume • Where the member has more than 10% leverage • Where a high risk policy applies • Where a complaint is submitted 	
Total monitoring threshold:	79%	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 Fair Wear 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: At Anna van Toor all production staff has their own suppliers for which they are responsible to address Fair Wear monitoring requirements. In addition, the Head of Production keeps an overview of the issues 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 Fair Wear teams cannot be used, the member companies' own auditing system must ensure sufficient quality in order for Fair Wear 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: Fair Wear 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: Audit reports and Corrective Action Plans (CAPs) are shared with the factory and improvement timelines are established based on the timelines provided by Fair Wear. Supplier, agent and Anna van Toor have access to a CAP on a shared online platform. This way, all parties always have the most recent updates available. Worker representatives are not systematically involved during the audit. Agents do at times involve worker representation during follow up. One factory with a smaller workforce had hosted a canteen meeting informing all workers about the audit outcomes and improvements.

Recommendation: Before an audit takes place, Anna van Toor 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.

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	Fair Wear 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: Anna van Toor has a basic system in place to follow up on corrective action plans. Open issues are marked red, partly resolved issues orange, and resolved issues green. Resolved issues are supported by photos, which are stored at Anna van Toor's server. When updates from the supplier-side are taking too long, reminder emails are sent by Anna van Toor. On a weekly basis, CAP follow-up statuses are discussed internally. Production managers are responsible for follow up for the factories that they collaborate with. Open CAP issues are discussed with factory management during on-site visits by agents. Anna van Toor does not visit locations outside of Europe, but does ask their agents to visit. Worker representatives are not systematically involved in the audit follow-up.

For audits conducted in 2018/19, Anna van Toor could demonstrate some progress. One verification audit commissioned by Fair Wear had not been followed up.

Recommendation: Fair Wear recommends Anna van Toor to only close issues when verification can be provided by showing proof (pictures, documentation) or by on-site visits of Anna van Toor/their agent, by including worker representation, or an independent third party. In many cases, the feedback and supportive evidence that is sent by suppliers can be complex and difficult to interpret when unfamiliar with the local laws and expertise. Anna van Toor can use Fair Wear's local team to verify the supportive evidence in case that is desirable or engage with credible local organisations or service providers in countries where Fair Wear is not active to support remediation and verification.

Fair Wear recommends Anna van Toor to engage with Fair Wear's local team and participate in training opportunities in key production countries such as Turkey.

Fair Wear encourages Anna van Toor to continue strengthening their system to analyse how they might have contributed to findings and what changes they can make in their purchasing practices.

Fair Wear also recommends Anna van Toor to gradually ensure factories establish independent worker representation and involve these representatives in monitoring and remediation of findings.

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.	92%	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: In 2019, Anna van Toor or its agents visited production locations responsible for 92% of its total production volume. Fair Wear's checklist for supplier visits was used during these visits. Outcomes of visits are documented in a short report and discussed internally.

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: In 2019, Anna van Toor has collected two external audit reports, assessed the quality, created corrective action plans based on the quality assessment, and followed-up on the findings. In some cases, reports were missing information on key labour standards.

Recommendation: Fair Wear recommends Anna van Toor to assess the quality of the external audit report and immediately discuss with the supplier what information is missing and how to collect that information.

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 Fair Wear membership, countries, specific areas within countries or specific product groups may pose specific risks that require additional steps to address and remediate those risks. Fair Wear requires member companies to be aware of those risks and implement policy requirements as prescribed by Fair Wear.	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.	3	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	Intermediate			3	6	-2
Other risks specific to the member's supply chain are addressed by its monitoring system	Intermediate			3	6	-2

Comment: For Turkey, Anna van Toor has informed its agent about legal regulations regarding the employment of Syrian refugees and possible risks of discrimination. The agent stated that no Syrian migrant workers are being employed at the time. However, suppliers do not have a policy in place regarding Syrian migrant workers. Neither the agent nor suppliers have participated in Fair Wear supplier seminars or roundtables on the issue. Anna van Toor has made efforts to audit their suppliers, but as explained under indicator 1.4 their agent shifted production to a different location without informing Anna van Toor in advance.

For production in other locations, Anna van Toor has a basic risk assessment in place. They have read Fair Wear's country studies, made summaries and shared these with production managers. Locations in Madagascar and Pakistan, where Fair Wear is not active, have been audited or external audit reports were collected. The brand does not have a formal risk management system in place where key risks are identified and strategies to prevent and mitigate these risks are outlined.

Requirement: Anna van Toor should ensure that all authorised subcontractors are identified and are included in their monitoring systems. Suppliers and agents should clearly understand that the use of unauthorised subcontractors is not acceptable, due to the high risk of rights violations.

Production locations who appear to be at particular risk of violation to Syrian refugees -or at risk of using unauthorized subcontractors- should be scheduled for an audit focused on these risks. As many Syrian refugee workers are working in subcontractor factories, Fair Wear encourages members to ensure the subcontractors are included whenever main suppliers are audited. All standard Fair Wear procedures (e.g. posting of Code of Labour Practices, option to participate in the Workplace Education Programme, Arabic and Turkish helpline etc.) also apply to subcontractors.

Anna van Toor should ensure that all suppliers have a policy in place on the registering of Syrian refugee workers. See for an example/draft policy Fair Wear's guidance for members.

Agents or intermediates working on Anna van Toor's behalf should be aware of the risks as outlined in the guidance for member brands.

Recommendation: Fair Wear recommends to Anna van Toor to systematically identify risks in its supply chain and determine actions to prevent and mitigate those risks. Examples include low wage levels, short-term contracts in Tunisia, gender-based violence in India or limited freedom of association, especially in China

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: Anna van Toor actively cooperated with another Fair Wear member for audit follow up in Turkey. The other member had the lead in the follow-up process and kept Anna van Toor updated via email.

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.	0.0%	Low-risk countries are determined by the presence and proper functioning of institutions which can guarantee compliance with national and international standards and laws. Fair Wear has defined minimum monitoring requirements for production locations in low-risk countries.	Documentation of visits, notification of suppliers of Fair Wear membership; posting of worker information sheets, completed questionnaires.	0	2	0

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
Member undertakes additional activities to monitor suppliers.	No			0	1	0

Comment: Anna van Toor visited all low-risk production locations in the past three years, has ensured the worker information sheet is posted and the questionnaire signed. Working conditions including wage levels were discussed as well.

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	Fair Wear 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 Fair Wear 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	Fair Wear believes it is important for affiliates that have a retail/wholesale arm to at least know if the brands they resell are members of Fair Wear or a similar organisation, and in which countries those brands produce goods.	Questionnaires are on file.	0	2	0

Comment: Anna van Toor sent Fair Wear's questionnaire to all its external brands, but has not received information by everyone.

Recommendation: Fair Wear encourages Anna van Toor to ensure they receive information about where the brands they resell produce and if they are committed to improving labour conditions.

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).	0%	Fair Wear 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 Fair Wear's information management system. Documentation of sales volumes of products made by Fair Wear or FLA members.	0	3	0

Comment: Many of Anna van Toor's external producers are working with BSCI and other initiatives but none of these are Fair Wear or FLA members.

Requirement: Anna van Toor has to ensure progress towards an external supplier base that is covered by either Fair Wear or have another acceptable system in place for monitoring its supply chain.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.13 Questionnaire is sent and information is collected from licensees.	No licensees	Fair Wear 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: 34

Earned Points: 21

3. Complaints Handling

Basic measurements	Result	Comments
Number of worker complaints received since last check.	3	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.	2	
Number of worker complaints resolved since last check.	1	

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 Fair Wear membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	1	1	-1

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 Fair Wear 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: Anna van Toor requires all production locations to return a picture of the posted Worker Information Sheet. In addition, everyone visiting on behalf of Anna van Toor is asked to take a picture of the Worker Information Sheet and check that is posted in the correct local language.

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.	11%	After informing workers and management of the Fair Wear CoLP and the complaints hotline, additional awareness raising and training is needed to ensure sustainable improvements and structural worker-management dialogue.	Training reports, Fair Wear's data on factories enrolled in the WEP basic module. For alternative training activities: curriculum, training content, participation and outcomes.	4	6	0

Comment: One Chinese factory participated in Fair Wear's Workplace Education Programme (WEP) basic module accounting for 11% of Anna van Toor's production volume in high risk countries.

Recommendation: Fair Wear recommends members to actively raise awareness about the Fair Wear Code of Labour Practices and Fair Wear complaint hotline among a larger portion of its suppliers. Anna van Toor 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 guidance on good quality training 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.	Yes	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.	3	6	-2

Comment: During its last financial year, Anna van Toor received three complaints from the same location. One complaint was investigated by Fair Wear, the team concluded that the complaint was largely not grounded. The other two complaints are under investigation or remediation. Anna van Toor's leverage at the location is below 1%. Another Fair Wear member sourcing from the site has taken the lead in addressing the complaints and communicates with the factory on behalf of Anna van Toor for this matter. Anna van Toor has received regular updates.

Recommendation: It is recommended to uncover the root causes of complaints and prevent them from recurring. When appropriate, the investigation includes incidents at other factories.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.5 Cooperation with other customers in addressing worker complaints at shared suppliers.	Active cooperation	Because most production locations supply several customers with products, involvement of other customers by the Fair Wear member company can be critical in resolving a complaint at a supplier.	Documentation of joint efforts, e.g. emails, sharing of complaint data, etc.	2	2	0

Comment: Another Fair Wear member sourcing from the site has taken the lead in addressing the complaints and communicates with the factory on behalf of Anna van Toor for this matter. Anna van Toor has received regular updates.

Complaints Handling

Possible Points: 17

Earned Points: 12

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 Fair Wear membership requirements helps to support cross-departmental collaboration when needed.	Emails, trainings, presentation, newsletters, etc.	1	1	0

Comment: Anna van Toor publishes a monthly newsletter for all staff and shares information through an internal app. Fair Wear membership has been featured several times. In addition, the company organises training for sales staff to share what Anna van Toor does with Fair Wear and a presentation about factory visits. Fair Wear membership is also included in the introduction booklet for new sales staff. Furthermore, Fair Wear membership is presented to all staff during the yearly presentation of the collections at Anna van Toor.

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 Fair Wear requirements and advocate for change within their organisations.	Fair Wear Seminars or equivalent trainings provided; presentations, curricula, etc.	2	2	-1

Comment: Production managers were trained several years ago on Fair Wear membership requirements and receive regular updates by the CSR team.

Recommendation: A training session on labour standards can be held for purchasing staff. Fair Wear can support or facilitate in providing trainings. In addition, it is recommended to actively take part in training opportunities Fair Wear offers such as: seminars, webinars and the Fair Wear annual conference.

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, Fair Wear audit findings.	2	2	0

Comment: Agents have been trained on Fair Wear membership and requirements. They are actively involved in supporting CoLP implementation. However, when discussing follow up of corrective actions, Fair Wear observed that Anna van Toor's Turkish agent might not have complete understanding of Fair Wear's approach.

Recommendation: Fair Wear recommends the member to actively train their sourcing contractors/agents on monitoring and remediating risks and enable them to support the implementation of the CoLP and encourage their participation in supplier seminars and other Fair Wear stakeholder events.

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. Fair Wear has developed several modules, however, other (member-led) programmes may also count.	Training reports, Fair Wear's data on factories enrolled in training programmes. For alternative training activities: curriculum, training content, participation and outcomes.	0	6	0

Comment: No suppliers have participated in training programmes that support transformative processes related to human rights.

Recommendation: Fair Wear recommends Anna van Toor 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 Fair Wear's Workplace Education Programme communication or violence prevention module or implement advanced training through service providers or brand staff. Fair Wear 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.	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: Anna van Toor has taken steps to learn more about subcontractors in their supply chain and has added several locations in Portugal to the Fair Wear database. Agents are asked to inform Anna van Toor prior to shifting production to another location. Once a year Anna van Toor confirms if their list of production locations is still correct. Anna van Toor does not visit locations outside Europe personally, but their agents are usually on site frequently.

Recommendation: Fair Wear recommends Anna van Toor to take additional efforts to ensure that the brand is always informed beforehand about the placement of production at production locations. Furthermore, Anna van Toor could also agree with its main suppliers that only a pre-selected number of production locations can be used for production.

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: For each supplier, Anna van Toor stores all relevant documents on its server. Other information on the compliance status of suppliers is shared among relevant staff verbally and via emails, in an informal way.

Information Management

Possible Points: 7

Earned Points: 4

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	Fair Wear's communications policy exists to ensure transparency for consumers and stakeholders, and to ensure that member communications about Fair Wear are accurate. Members will be held accountable for their own communications as well as the communications behaviour of 3rd-party retailers, resellers and customers.	Fair Wear membership is communicated on member's website; other communications in line with Fair Wear communications policy.	2	2	-3

Comment: Anna van Toor communicates about Fair Wear on its website, brochures, magazine, TV screens in shops, and via social media.

Recommendation: Fair Wear recommends to connect the webpage about Fair Wear Foundation with the sustainability webpage on their website.

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 Fair Wear'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: The 2018 performance check report has been published on Anna van Toor's website.

Recommendation: Fair Wear recommends Anna van Toor to publish the most recent performance check report.

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 Fair Wear's communication policy.	Social report that is in line with Fair Wear's communication policy.	2	2	-1

Comment: A Social Report has been submitted to Fair Wear and is published on Anna van Toor's company's 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 Fair Wear policies are integrated into the structure of the company.	Meeting minutes, verbal reporting, Powerpoints, etc.	2	2	0

Comment: Fair Wear membership is evaluated by relevant staff and top management. This is done in an informal, ad-hoc way. Supplier feedback is taken into account in these evaluations. The Brand Performance Check report is used to set priorities for the next year.

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.	50%	In each Brand Performance Check report, Fair Wear may include requirements for changes to management practices. Progress on achieving these requirements is an important part of Fair Wear 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: In Anna van Toor's last performance check report, ten requirements were included. Anna van Toor has made some progress on most of these issues. In some cases, the requirement was completely fulfilled, like ensuring monitoring requirements for low-risk countries are met. Ensuring that the Fair Wear questionnaire has been signed and basic due diligence has been conducted before orders are placed remains a challenge.

Evaluation

Possible Points: 6

Earned Points: 6

Recommendations to Fair Wear

Anna van Toor would appreciate guidance on worker representation for production locations with a small work force.

Anna van Toor recommends Fair Wear to update country studies more frequently or if risks and legal requirements have not changed significantly, to indicate when this has been last determined.

Scoring Overview

Category	Earned	Possible
Purchasing Practices	20	52
Monitoring and Remediation	21	34
Complaints Handling	12	17
Training and Capacity Building	5	11
Information Management	4	7
Transparency	5	6
Evaluation	6	6
Totals:	73	133

Benchmarking Score (earned points divided by possible points)

55

Performance Benchmarking Category

Good

Brand Performance Check details

Date of Brand Performance Check:

19-05-2020

Conducted by:

Lisa Suess

Interviews with:

Lisette van Toor, marketing and sales

Iris Moss, assistant product manager

Alissa de Jong, sustainability assistant

Karen Hooimeijer, head of production