



## BRAND PERFORMANCE CHECK

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Bel-confect NV

PUBLICATION DATE: DECEMBER 2018

this report covers the evaluation period 01-07-2017 to 30-06-2018

## ABOUT THE BRAND PERFORMANCE CHECK

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

FWF's Brand Performance Check is a tool to evaluate and report on the activities of FWF's member companies. The Checks examine how member company management systems support FWF's Code of Labour Practices. They evaluate the parts of member company supply chains where clothing is assembled. This is the most labour intensive part of garment supply chains, and where brands can have the most influence over working conditions.

In most apparel supply chains, clothing brands do not own product locations, and most product locations work for many different brands. This means that in most cases FWF member companies have influence, but not direct control, over working conditions. As a result, the Brand Performance Checks focus primarily on verifying the efforts of member companies. Outcomes at the product location level are assessed via audits and complaint reports, however the complexity of the supply chains means that even the best efforts of FWF member companies cannot guarantee results.

Even if outcomes at the product location level cannot be guaranteed, the importance of good management practices by member companies cannot be understated. Even one concerned customer at a product location can have significant positive impacts on a range of issues like health and safety conditions or freedom of association. And if one customer at a product location can demonstrate that improvements are possible, other customers no longer have an excuse not to act. The development and sharing of these types of best practices has long been a core part of FWF's work.

The Brand Performance Check system is designed to accommodate the range of structures and strengths that different companies have, and reflects the different ways that brands can support better working conditions.

This report is based on interviews with member company employees who play important roles in the management of supply chains, and a variety of documentation sources, financial records, supplier data. The findings from the Brand Performance Check are summarized and published at [www.fairwear.org](http://www.fairwear.org). The online [Brand Performance Check Guide](#) provides more information about the indicators.

## BRAND PERFORMANCE CHECK OVERVIEW

Bel-confect NV

Evaluation Period: 01-07-2017 to 30-06-2018

MEMBER COMPANY INFORMATION	
Headquarters:	Dottenijs, Belgium
Member since:	01-06-2016
Product types:	Workwear
Production in countries where FWF is active:	Bangladesh, China, Tunisia, Turkey
Production in other countries:	Albania, Belgium, Hungary, Pakistan, Portugal
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	62
Category	Good

## Summary:

Bel-Confect has shown progress and met most of FWFs' performance requirements. Bel-Confect's monitoring threshold is 79% which is beyond FWF second year membership requirements. After the Needs Improvement score of last year, Bel-Confect hired a CSR advisor with experience with FWF membership. The investment has paid off, as the total benchmarking score of 62 places Bel-Confect back into the 'Good' category.

With her help, Bel-Confect has established new working processes for due diligence, data collection, audit sharing, CAP remediation, monitoring and communications which enable Bel-Confect to assure that their social compliance is organized in a systematic way. As part of remediation Bel-Confect invested in the factory of one of their strategic partners in order to improve on several health and safety issues.

When it comes to corrective actions, payments towards living wages and excessive overtime are still a challenge and need special attention in the coming years. More progress was made on health and safety findings. A big step has been the signing of the Bangladesh Accord. The requirements for external productions and low risk countries deserve attention.

## PERFORMANCE CATEGORY OVERVIEW

**Leader:** This category is for member companies who are doing exceptionally well, and are operating at an advanced level. Leaders show best practices in complex areas such as living wages and freedom of association.

**Good:** It is FWF's belief that member companies who are making a serious effort to implement the Code of Labour Practices—the vast majority of FWF member companies—are 'doing good' and deserve to be recognized as such. They are also doing more than the average clothing company, and have allowed their internal processes to be examined and publicly reported on by an independent NGO. The majority of member companies will receive a 'Good' rating.

**Needs Improvement:** Member companies are most likely to find themselves in this category when major unexpected problems have arisen, or if they are unable or unwilling to seriously work towards CoLP implementation. Member companies may be in this category for one year only after which they should either move up to Good, or will be moved to suspended.

**Suspended:** Member companies who either fail to meet one of the Basic Requirements, have had major internal changes which means membership must be put on hold for a maximum of one year, or have been in Needs Improvement for more than one year. Member companies may remain in this category for one year maximum, after which termination proceedings will come into force.

Categories are calculated based on a combination of benchmarking score and the percentage of own production under monitoring. The specific requirements for each category are outlined in the Brand Performance Check Guide.

## 1. PURCHASING PRACTICES

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.1a Percentage of production volume from production locations where member company buys at least 10% of production capacity.	72%	Member companies with less than 10% of a production location's production capacity generally have limited influence on production location managers to make changes.	Supplier information provided by member company.	3	4	0

**Comment:** The owners of Bel-Confect are also owners of a distribution center (DC) in Tunisia. Staff of this DC is in daily contact with factories with regard to planning, quality, follow-up, for approximately 60% of the FOB. Bel-Confect has significant leverage at their Tunisian suppliers. On a weekly base Bel-Confect is shipping fabrics to their DC and finished garments back. The Belgian production manager visits the DC approximately every month and also regularly visits the factories.

Bangladesh is a relatively new production country for Bel-Confect. Bel-Confect joined the Accord and related to that, made several changes in their supplier base in Bangladesh this year.

**Recommendation:** FWF recommends Bel-Confect to consolidate its supplier base where possible, especially considering the relationship with suppliers in their relatively new production country Bangladesh. It is advised to describe the process of consolidation in a sourcing strategy that is agreed upon with top management/sourcing staff, which includes a responsible exit strategy.

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.	3%	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

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.	54%	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:** Bel-Confect aims to have long term business relations. With 54% of production locations there is an existing business relation for at least five years. In other countries the relationship is established with an agent. In China, Bangladesh and Turkey the agents are Dutch-speaking.

**Recommendation:** FWF recommends Bel-Confect 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 relationship 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.	Yes	The CoLP is the foundation of all work between production locations and brands, and the first step in developing a commitment to improvements.	Signed CoLPs are on file.	2	2	0

**Comment:** As part of their due diligence Bel-Confect requires a signed and returned questionnaire from (new) production locations before placing orders. Bel-Confect could show the photo's on file.

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

**Comment:** Bel-Confect developed a new due diligence procedure for (new) production locations this year. In a first e-mail the FWF membership of Bel-Confect is explained and an existing audit report is requested and analyzed. It has developed guidelines for the assessment of audits and analyzed the quality of the audit with the FWF Audit Quality Assessment Tool.

During sampling suppliers have to return the signed questionnaire and a photo of the CoLP in the facility. When the production manager visits the locations she also takes photos of the posted Worker Information Sheets. The CSR advisor files the documents and photos. Orders can only be placed after permission of the CSR advisor.

In addition to this, Bel-Confect informed their agents about the new process and started working with a well-informed agent that has experience with working with FWF. One of their agents was suspicious in the beginning and Bel-Confect took time to explain, which made this agent more willing to cooperate

Based on country studies Bel-Confect has identified more general country risks. With new and existing suppliers Bel-Confect started a dialogue with their suppliers about the country specific risk country like Syrian refugees in Turkey and harassment at work in Bangladesh. These topics have been addressed during visits. Bel-Confect joined the Bangladesh Accord.

Bel-Confect could show photo and video material of their production manager discussing these topics with factory management and with workers.

**Recommendation:** A next step in the due diligence policy is including wage ladder assessments.

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:** Bel-Confect has changed the way of evaluating compliance with the CoLP. Bel-Confect organized social audits and CAP follow up is discussed, it is however not yet clear how this is related to production decisions.



**Recommendation:** Bel-confect is encouraged to make more explicit how social compliance in the supplier rating system in which quality, relationship, price and planning is weighted and how compliance with CoLP leads to production decisions.

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:** Bel-Confect produces 80% custom-made for clients, often based on longer-term contracts for a stable client base. It also has 20% production of Never Out of Stock (NOS) items.

For the custom-made production Bel-Confect has a production scheme with defined steps for risk analysis of the fabric, dyeing, design, production etc. After every step, Bel-Confect confirms the status to their clients. Delay in early stages does not have consequences for lead times in production process.

Bel-Confect has guidelines for production lead times per country per fabric type and consults the supplier in advance before setting a specific lead time. This is in an early stage to the client. In case a client indicates a fast delivery, Bel-Confect discusses this with suppliers or has three Tunisian facilities where they place the order in case possible.

With regard to the NOS items planning, Bel-Confect has an annual forecast which is shared with the suppliers, which are consulted. Bel-Confect is well aware of production capacity in Tunisia and in the planning seasonality, like local holidays and Ramadan, is taken into account. Materials are blocked and sent from Belgium to Tunisia.

**Recommendation:** FWF recommends Bel-Confect to gain more insight into the production capacity of their factories in the other production countries and assess a relation with their own production planning in these countries to prevent this for future orders.

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:** For the suppliers in Tunisia overtime is more limited, the audits at suppliers in Turkey and Bangladesh reveal (excessive) overtime or inability to verify overtime in records.

When excessive overtime is discovered in an audit, Bel-Confect responds through discussing the results of the audit and discussing follow-up of the CAP. Sometimes the internal planning of Bel-Confect can be adapted. One of the suppliers was not willing to limit excessive overtime and Bel-Confect decided to stop production keeping in mind the responsible exit strategy.

Bel-Confect mentioned that it is difficult to keep overtime on the agenda when it has a low leverage and did not specifically focus on this topic this year. Bel-Confect did not yet take steps conduct a root-cause analysis to identify how overtime can be prevented in the future.

Bel-Confect is no longer sourcing from one supplier in Bangladesh where excessive overtime (more than 99 hours a week) was found, as this supplier was not willing to improve social compliance and become member of the Accord.

**Requirement:** Bel-Confect 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.

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

**Comment:** Bel-Confect developed a pricing strategy. The company is aware of minimum wages, production minutes per style and prices.

Bel-Confect has long term relationships with clients and addressed this topic at some of their clients. Bel-Confect showed for one of their larger clients an email discussion that the prices will increase to reflect wage increases for workers in the production locations.

For Tunisia Bel-Confect has a general insight in costs per style, for other countries this knowledge is less developed yet. Bel-Confect could not yet explicitly show how the labour cost per style level are calculated and could not explicitly ensure that enough was paid.

**Recommendation:** Bel-Confect is recommended to investigate wages levels in production countries, among others by making use of FWFs Wage Ladder and country studies. As an advanced step, increased transparency in costing and productivity gives insight in the labour costs per product. This forms the basis for ensuring enough is paid to cover at least minimum wage and for making steps towards living wages.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.9 Member company actively responds if suppliers fail to pay legal minimum wages.	No minimum wage problems reported	If a supplier fails to pay minimum wage, FWF member companies are expected to hold management of the supplier accountable for respecting local labour law.	Complaint reports, CAPs, additional emails, FWF audit reports or other documents that show minimum wage issue is reported/resolved.	2	2	-2

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 root causes of wages lower than living wages with suppliers and takes steps towards the implementation of living wages.	Basic approach	Sustained progress towards living wages requires adjustments to member companies' policies.	Documentation of policy assessments and/or concrete progress towards living wages.	2	8	0

**Comment:** This year Bel-Confect analyzed wages in FWF and external audits and discovered that for most suppliers workers received more than minimum wage and not yet living wage. Bel-Confect has identified their Tunisian suppliers with high leverage as possible first suppliers to work towards payment of living wages.

**Requirement:** Member company has to take adequate steps to move towards living wages as estimated by local stakeholders.

**Recommendation:** FWF encourages Bel-Confect to assess the hypothetical cost effects of increasing wages towards benchmarks that are included in the wage ladder. To support companies in this process FWF has developed a calculation model that estimates the effect on FOB and retail prices under different pricing models.

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

## PURCHASING PRACTICES

Possible Points: 44

Earned Points: 27

## 2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	77%	
% of production volume where monitoring requirements for low-risk countries are fulfilled	2%	FWF low risk policy should be implemented. 0 = policy is not implemented correctly, N/A = no production in low risk countries.
Meets monitoring requirements for tail-end production locations.	N/A	1st or 2nd year member and tail-end monitoring requirements do not apply.
Total of own production under monitoring	79%	Minimums: 1 year: 40%; 2 years 60%; 3 years+: 80-100% Measured as a percentage of turnover.

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

Comment: The CEO and the CSR advisor are designated to follow up.

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:** Bel-Confect developed a new process for sharing audits and corrective action plans. Upon receiving the audit and CAP, Bel-Confect identifies priorities and timing for the suppliers. In case of a direct contact, Bel-Confect shares the audit and CAP by email/skype and plans a visit with the production manager to discuss how the follow up is going so far. Audit and CAP are shared with worker representative where applicable.

In Tunisia the DC, which is in frequent contact with the suppliers, has an active role in follow-up of the CAP and contact with the worker representatives about CAP follow up.

When an audit and CAP are send to an agent to forward it to a supplier, Bel-Confect gives additional explanation to the agent through telephone / email.

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:** Bel-Confect initiated three FWF audits in China, Turkey and Bangladesh and three audits conducted by another agent which is trained in the FWF audit methodology, all in Tunisia.

Bel-Confect could show active CAP follow-up for these audits. The supplier in Bangladesh was not willing to implement the CAP of the FWF audit and not willing to submit to requirements of the Bangladesh Accord. Production stopped at this supplier. For the CAP follow up in China and Turkey an agent is involved, which makes CAP follow up slower and more challenging and therefore issues are still outstanding.

The first social audit at the key suppliers in Tunisia resulted in active CAP follow up. Non-compliance in the area of health and safety were remediated within three months. Bel-Confect had an active role in remediation, paid some of the improvement and had contact with constructors about this. Bel-Confect has communicated to suppliers that they expect improvement which will result in growth and that repeatedly non-compliance may lead to exit.

**Recommendation:** To facilitate remediation, Bel-Confect 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.

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.	78%	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



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: Bel-Confect could show existing audit reports, the use of Audit Quality Assessment Tool and follow-up on corrective action plans.

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.	3	6	-2
Compliance with FWF enhanced monitoring programme Bangladesh	Intermediate			3	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	Policies are not relevant to the company's supply chain			N/A	6	-2

**Comment:** In 2018 Bel-Confect signed the Bangladesh Accord and discussed fire and building safety with their suppliers. As some of their suppliers were unwilling to be audited as part of the Accord requirements, Bel-Confect stopped sourcing and started sourcing from new suppliers. Bel-Confect discusses the risk of harassment on the workplace with their Bangladesh suppliers and with members of the working committees

Bel-Confect provided their Turkish suppliers with information about Syrian refugees and received confirmation that this was not an issue in these factories.

**Recommendation:** Bel-Confect should share responsibilities with their production locations as business partners to improve workers' safety at the workplace. At the minimum, the member company should provide necessary support to the suppliers. In terms of fire and building safety, the member could offer financial or technical support, or offer flexible lead time so that factories could prioritize remediation.

In terms of ensuring women's safety at work, the brand should make sure that suppliers have sufficient knowledge and a functional system to promote gender equality and prevent gender based violence. A functional system to prevent violence needs involvement of both factory management and workers representatives. FWF local team has extensive experience on supporting both employees and employers in setting up anti-harassment systems. FWF local team could provide training and regular support to suppliers upon request.

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:** Bel-Confect is cooperating with other brands at shared suppliers.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.9 Percentage of production volume where monitoring requirements for low-risk countries are fulfilled.	0-49%	Low-risk countries are determined by the presence and proper functioning of institutions which can guarantee compliance with national and international standards and laws.	Documentation of visits, notification of suppliers of FWF membership; posting of worker information sheets, completed questionnaires.	0	2	0

Comment: Only one of the three suppliers in low risk countries was visited last year.

**Requirement:** Monitoring requirements need to be fulfilled for production in low-risk countries in order for it to be counted towards the monitoring threshold. All production sites in low-risk countries must:

- o Ensure up to date information on the labour conditions in the location either by a regular visit and/or a report by a third party;
- o Be informed of FWF membership and return the completed CoLP questionnaire before production orders are placed;
- o Be aware of specific risks identified by FWF;
- o Have the FWF Worker Information Sheet posted in local languages.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.10 Extra bonus indicator: in case FWF member company conducts full audits above the minimum required monitoring threshold.	Not applicable	FWF encourages all of its members to audit/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	3	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	FWF believes it is important for affiliates that have a retail/wholesale arm to at least know if the brands they resell are members of FWF or a similar organisation, and in which countries those brands produce goods.	Questionnaires are on file.	0	2	0

Comment: Questionnaire is sent to most external producers, however not to all.

Requirement: Bel-confect should send the FWF questionnaire for external production to the brands it resells.

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).	4%	FWF believes members who resell products should be rewarded for choosing to sell external brands who also take their supply chain responsibilities seriously and are open about in which countries they produce goods.	External production data in FWF's information management system. Documentation of sales volumes of products made by FWF or FLA members.	1	3	0

Comment: One of the external producers is member of FWF or another credible initiative.

Requirement: Bel-Confect has to ensure progress towards an external supplier base that is covered by either FWF 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	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

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## MONITORING AND REMEDIATION

Possible Points: 34

Earned Points: 21

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### 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 CEO and CSR advisor are designated to address worker complaints.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.2 System is in place to check that the Worker Information Sheet is posted in factories.	Yes	The Worker Information Sheet is a key first step in alerting workers to their rights.	Photos by company staff, audit reports, checklists from production location visits, etc.	2	2	0

Comment: Bel-Confect could show the posted worker information sheet for a selection of suppliers.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.3 Percentage of FWF-audited production locations where at least half of workers are aware of the FWF worker helpline.	25%	The FWF complaints procedure is a crucial element of verification. If production location based complaint systems do not exist or do not work, the FWF worker helpline allows workers to ask questions about their rights and file complaints. Production location participation in the Workplace Education Programme also count towards this indicator.	Percentage of audited production locations where at least 50% of interviewed workers indicate awareness of the FWF complaints mechanism + percentage of production locations in WEP programme.	2	4	0

Comment: In the next financial year Bel-Confect plans to organise several WEP trainings to increase workers' awareness.

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



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## COMPLAINTS HANDLING

Possible Points: 7

Earned Points: 5

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## 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	-1

Comment: Once a month, there is an internal commercial meeting in which information about FWF membership is shared, including photos and films of factory visits. In addition to this, there are informal meetings in which FWF membership, as part of CSR, is discussed. Beginning 2019 a new website is planned on which FWF membership will also have a more central place than on the current website.

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: The CSR Advisor keeps all staff in direct contact with suppliers and other staff members that can contribute to improved performance with the Brand Performance Check Guidelines up to date.

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	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.	1	2	0

**Comment:** Some of the agents are well-informed, while for other agents it took more time to understand the relevance of the FWF Code of Labour Practices. Bel-Confect took the time to explain and now these agents are also more involved.

**Recommendation:** FWF recommends Bel-Confect to actively train their sourcing contractors/agents on monitoring and remediating gender-related problems and enable them to support the implementation of the CoLP.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.4 Production location participation in Workplace Education Programme (where WEP is offered; by production volume)	15%	Lack of knowledge and skills on best practices related to labour standards is a common issue in production locations. Good quality training of workers and managers is a key step towards sustainable improvements.	Documentation of relevant trainings; participation in Workplace Education Programme.	2	6	0

**Comment:** This financial year there was more focus on improving on the requirements of last performance check. Next financial year the accent is on educating the workers.

**Recommendation:** In order to ensure awareness and enhance understanding of the relevant labour standards, grievance mechanisms and the importance of a good mechanism for communication between employers and workers in the workplace, FWF developed the Workplace Education Programme. FWF currently offers the following training modules for the WEP: Basic, Communication, Gender Based Violence, Supervisor and the Factory Guide. More info on availability in countries can be found on the FWF website. Bel-Confect should motivate its main supplier(s) to join WEP trainings.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.5 Production location participation in trainings (where WEP is not offered; by production volume)	0%	In areas where the Workplace Education Programme is not yet offered, member companies may arrange trainings on their own or work with other training-partners. Trainings must meet FWF quality standards to receive credit for this indicator.	Curricula, other documentation of training content, participation and outcomes.	0	4	0

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## TRAINING AND CAPACITY BUILDING

Possible Points: 15

Earned Points: 6

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## 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:** This financial year Bel-Confect has mapped their supply chain, informed agents about the importance to know subcontractors and changed their information system. Bel-Confect could show that this system has orders booked in the level of the subcontractors.

**Recommendation:** Subcontractors that are mentioned in audit reports and by suppliers in returned questionnaires should be included in the database. FWF recommends Bel-Confect to systematically check audit reports and questionnaires and discuss these with their suppliers.

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:** The production manager, who regularly visits the production locations, exchanges the information with the CEO and CSR advisor.

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## INFORMATION MANAGEMENT

Possible Points: 7

Earned Points: 4

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## 6. TRANSPARENCY

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
6.1 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

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
6.2 Member company engages in advanced reporting activities	Published Performance Checks, Audits, and 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:** Currently the social report is communicated on the website with information about FWF and general information about sourcing countries.

**Recommendation:** FWF recommends Bel-Confect to publish the brand performance check report and disclose production locations to the public.

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 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: Report is submitted and published on the Bel-Confect website.

## TRANSPARENCY

Possible Points: 6

Earned Points: 5



## 7. EVALUATION

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
7.1 Systemic annual evaluation of FWF membership is conducted with involvement of top management	Yes	An annual evaluation involving top management ensures that FWF policies are integrated into the structure of the company.	Meeting minutes, verbal reporting, Powerpoints, etc.	2	2	0

Comment: The CEO and CSR Advisor are both responsible for progress.

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.	80%	In each Brand Performance Check report, FWF may include requirements for changes to management practices. Progress on achieving these requirements is an important part of FWF membership and its process approach.	Member company should show documentation related to the specific requirements made in the previous Brand Performance Check.	4	4	-2

Comment: Bel-Confect made progress on all the 20+ requirements that were in the performance check report last year.

## EVALUATION

Possible Points: 6

Earned Points: 6

## RECOMMENDATIONS TO FWF

The planning process for audits and the user-friendliness of the database could be improved.

For both Bel-Confect and suppliers the structure and summary of Wethica audits are more easy to grasp and understand. Bel-Confect suggests a summary on a one pager for FWF audits. Another suggestion is a score with a color code system.

A positive comment is that FWF now has a Belgium contact person and organizes the Belgium stakeholder meeting.

Could the tools / suggestions how to work towards living wage become more concrete? The book is rather difficult to read for both Bel-Confect and for suppliers.

Is it possible to provide the Health and Safety checklist on tablet or in an App, in which for example also photos can be included?

## SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	27	44
Monitoring and Remediation	21	34
Complaints Handling	5	7
Training and Capacity Building	6	15
Information Management	4	7
Transparency	5	6
Evaluation	6	6
Totals:	74	119

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

62

### PERFORMANCE BENCHMARKING CATEGORY

Good

## BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

13-11-2018

Conducted by:

Mariette van Amstel, Arja Schreij

Interviews with:

Filip Lietear - CEO

Saartje Boutsen - CSR advisor

Mieke De Kerpel - Production manager