

Social Report 2018-19

Proud member of Fair Wear Foundation.

Introduction

As required by the terms of our membership of Fair Wear Foundation (FWF), each affiliate is obliged to report progress in implementing the Code of Labour Practices. In this social report we describe how we have implemented the previous year's work plan. The affiliates' social report is an important tool in communicating our efforts towards fair labour standards.

This Social Report is written by Saartje Boutsen and approved by Fair Wear Foundation. Belconfect is an affiliate of Fair Wear Foundation since 2016.

Images used in this report:

All images in this report are made by staff members of Bel-Confect. They show real workers from factories Belconfect works with in Tunisia, Turkey, Albania, Bangladesh, India.

Social Report 2018-19

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it's not about
ideas,
**it's about
making ideas
happen.**



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About Belconfect



“Belconfect wants to offer its customers high-quality safety work- and footwear, to assure a safe and comfortable work environment. That is what we also want to offer the textile workers in our supply chain: a safe working place where international social standards are respected. Since we became a member of Fair Wear Foundation, we are more aware of possible bottlenecks in our supply chain and we want to take up our ethical and sustainable commitment.”

Christ Segers, owner

“During the next 5 years, we intend to continue our growth by increasing the number of key accounts for which we produce working outfits from start to finish. In addition, we intend to grow in our fair wear engagement. Our commitment to sustainable supply chains affects our buying decisions, and it is an ongoing process that demands transparency and an innovative approach to our whole long-term business.”

Filip Lietaer, owner



“We make a living by what we get, but we make a life by what we give” (Winston Churchill)

Summary

Belconfect designs and manufactures functional and qualitative workwear and protective clothing that meets the client's particular requirements. We also specialize in the design and manufacture of safety footwear.

In a market that is stagnant yet competitive and replete with highly selective and demanding users of personal protective wear and equipment, all wanting to be assured of reliable means to assure a safe and comfortable work environment, Bel-Confect profiles itself as the best possible partner.

Bel-Confect achieves this by investing in knowledge, design, production resources, logistical facilities and by offering innovative, flexible, and effective solutions in the areas of custom-made or standard workwear and safety footwear. It means also that Bel-Confect attaches significant importance to improving the overall working conditions in the clothing industry, and we want to take an active role. Because improvement of working conditions is a complex issue, Bel-Confect is convinced that joint initiatives, cross-country and with all stakeholders involved, can give more energy and can accomplish things on a larger scale. That is why Bel-Confect joins the Fair Wear Foundation (FWF) since June 2016.

After three years of membership, we can state that Corporate Social Responsibility is now fully integrated in our daily supplier relations. We experienced that good CSR practices and good product quality are strongly linked, so social compliance issues are a returning point on the agenda in supplier meetings.

From July 2018 till June 2019, we increased again the number of social audits, we continued to focus on increasing transparency and communication with our suppliers on social standards and health & safety issues, and we further invested in a close follow up of the audit results and Corrective Action Plans of our main suppliers. We have a clear due diligence process before going into business with new suppliers and in every new factory that starts to produce for Belconfect, we make sure the FWF Code of Labour Practices and the complaints procedure are visible for all workers.



We are proud to see that last year our main suppliers invested more in social compliance and good health & safety measures for their workers. That made it also possible to have more in-depth discussions with our main suppliers in Tunisia and Albania on living wages. Knowing that our efforts are important and useful, stimulates us to continue with ambition for the future.

Our sourcing process

Sourcing strategy & planning

For our professional clients, we undertake to guide the entire production process, from the design phase to production and delivery. Models, colors, logos, technical aspects of fabrics and the desired functional characteristic are being worked out in consultation with the client.

Furthermore, we maintain a permanent stock of more than 80.000 articles of work clothes, outfits designed for use during welding and machine assembly operations, signalization, rain, winter outfits, and the like. Our clients are also given the opportunity to select from an inventory that contains more than 15.000 pairs of safety footwear items including accessories for use in the most divergent applications.

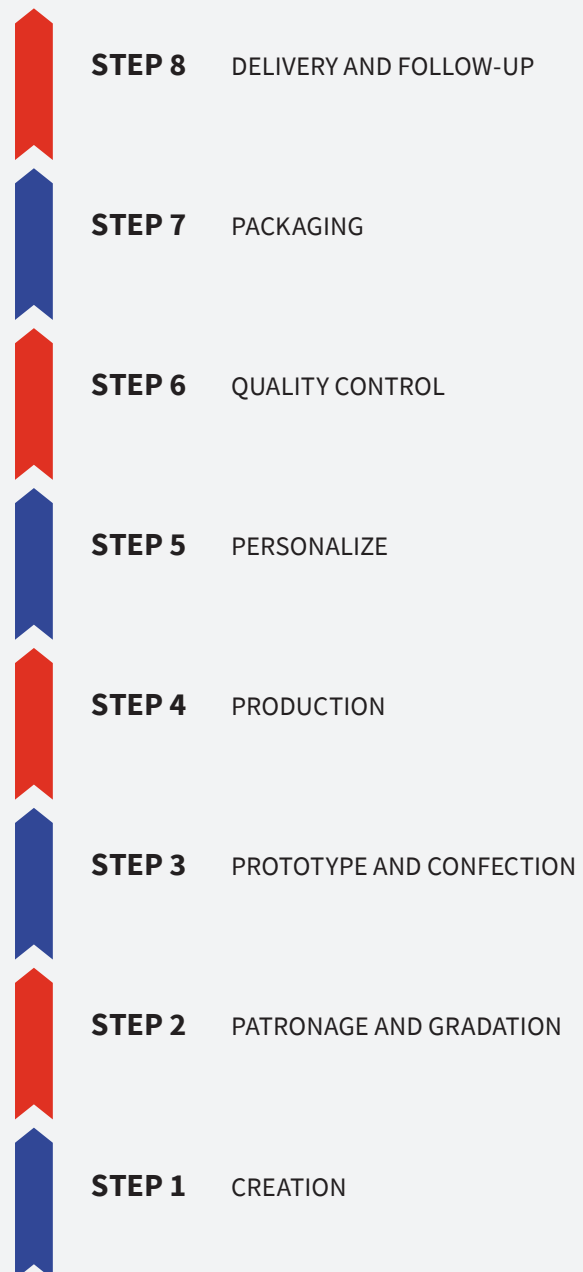
D-FORCE is a private label developed by Belconfect. It comprises a collection of casual work clothes and safety footwear, for immediate delivery out of our permanent stock.

Belconfect also delivers standard and client-specific image clothing such as T-shirts, polo shirts, fleece vests, sweaters and pullovers, soft shell jackets, parkas, ... These provide for diverse print-on possibilities such as silk-screen printing, transfer prints and embroidery.

”

For our professional clients, we undertake to guide the entire production process, from the design phase to production and delivery.

CUSTOM MADE PROCESS



Our sourcing process

To produce our work wear, we worked in 2018-2019 together with suppliers in Tunisia, China, Bangladesh, Pakistan, Turkey, Albania, Hungary, Romania, Portugal and recently India. With almost all our suppliers, we have a very regular direct contact and we have developed cooperative long-standing business relations. For production in Asian countries, we work with a limited number of agents. Also with these agents, we have open and cooperative long-standing business relations. They are also aware of our fair wear engagements. For shoes, we collaborate with some external producers, like for example ISM (German based manufacturers of Puma and Albatros Safety Shoes), Arbesko (Sweden) and Robusta (Spain).

Persons involved in sourcing decisions are the CEO, the procurement manager, the project manager, and the CSR advisor. Criteria for selecting a supplier are quality and workmanship, compliance with our fair wear policy, the capability of the supplier to produce the product, availability of required technologies/machines, and price. A good price-quality ratio is our objective and must go hand in hand with a fair wear engagement of the supplier. The procurement manager can select new suppliers, but only after a positive feedback of the CSR adviser, orders can be placed.

More than 50% of our workwear production is made in Tunisia. We fully equip our production locations in Tunisia, and we guarantee a stable income in a long-term relationship.

Belconfect delivers the fabrics and furniture of the garments – from which we know the prices – to our Tunisian production locations. So, the price we pay them is the cost for sewing the garments. We also receive a ‘grille de salaire’ from our suppliers.

This means we have a quite clear idea on how prices are built, and we can link this to our pricing strategy and our engagement to pay living wages. We started an active dialogue on living wages with our main Tunisian suppliers.

Belconfect also participated in the FWF living wage seminar in Tunisia: we will use the FWF living wage tools to ensure our workers will get decent living wages.

Market insight.

Tunisia

57.9%

Turkey

13.4%

China

8.6%

How we produce globally.

Bangladesh

8.1%

Albania

4.6%

Hungary

2.4%



Our sourcing process

In other countries, we buy ready-made garments and we work with a piece price. As we choose to build up long term relations, and as quality is an important criterium, price is important but not the only key factor.

In 2017, Belconfect started to order in Bangladesh as a new production country, because of the interesting price-quality ratio. Belconfect became a member of the Bangladesh Accord on Fire and Building Safety to ensure good and safe working conditions. This means that all our factories will be inspected on fire, electricity and building safety and remediation before a deadline will be required by the Accord.

Factories that are not open for inspections by the Accord inspectors, or factories that do not show considerable progress in remediation, are listed as 'terminated factories' by the Bangladesh Accord. Some factories did not function in line with the standards of the Accord, so this affected significantly our sourcing decisions in Bangladesh. We stopped working with these factories, and today our production in Bangladesh is limited to one agent and one factory, as we realized that CSR and quality performance go often hand in hand.

In 2018, Belconfect also started to source in India, where we work with a new supplier specialized in producing workwear in bio and fairtrade cotton.



Our sourcing process

**Production cycle
in sourcing**



” Belconfect works custom made and project based. So we place an order only after full agreement on the product by the customer.

Operating process.. How we work?

Belconfect works custom made and project based. So we place an order only after full agreement on the product by the customer.

Sometimes this process can take several months. Than we need to buy the fabrics, the dyeing process can take 6 weeks. Than the production process follows, which will take 4 some 6 weeks. We always preview also 2 weeks extra, is case this is needed.

We communicate always very clearly with the supplier on the needed production time, without an absolute deadline. It is an advantage that our production locations do not need to work under pressure.

Customer/project review

Research and calculation
2 to 3 weeks

Detailed quote

Customer agreement

Launch of new project
3 weeks

Lapdip and first sample

Customer agreement
4 weeks

Pre production sample

Customer agreement

Launch of production

Confection and QC
4 to 12 weeks

Transport and reception
1 to 6 weeks

Delivery customer

Our sourcing process

Supplier relations

Belconfect has a very regular direct contact with all its suppliers and has developed cooperative long-standing business relations with most of them. More than 50 percent of the total order volume in 2018-2019 was produced by our supplier factories in Tunisia, they are visited every month by our Procurement Manager. Also both owners Christ Segers and Filip Lietaer have direct contact with all Tunisian suppliers and they visit on a regular base the factories. CSR topics are part of the agenda, and with our main supplier we had also good discussions on living wages.

Also our suppliers in Europe are visited regularly. This year we visited again our supplier in Albania, with whom we have a business relationship for more than ten years. This supplier is important in our FOB values, but as neither FWF nor Wethica had auditors available to do an audit in Albania, we organized our own CSR visit. The main objective was to carry out a Health & Safety Check and to discuss with the management issues like wages, working hours, worker delegations, etc. During the visit, we suggested them to use floor markings in the corridors and we advised to install smoke detectors and a fire alarm system and to organize fire drills. This is an issue we really want the management to invest in without any delay. But overall it is a clean and well organized factory. The company provides transportation with busses from and to the factory, and there are no overtime hours. The social provision such as wages and extras are above the average, which is surely a step towards living wages.

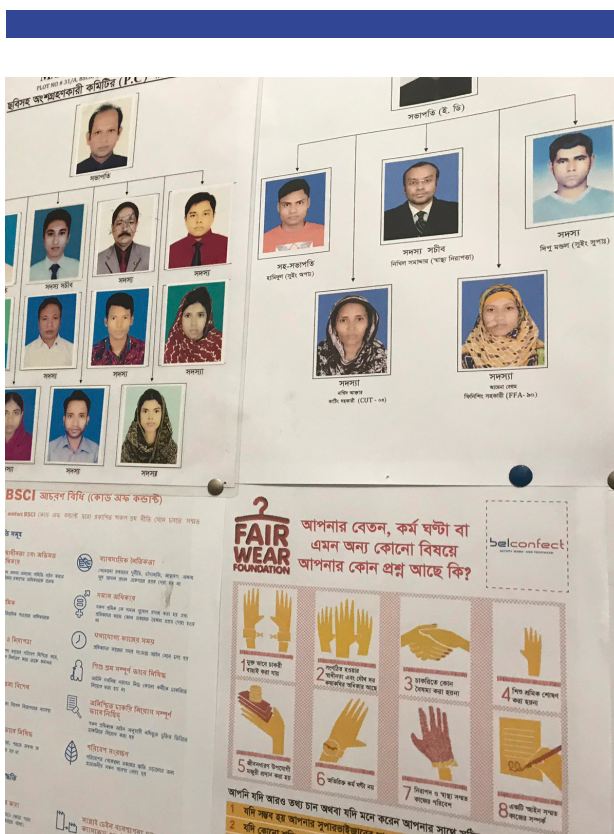
For our production in Asian countries, we work through several agents, but we also visit the factories by ourselves. We work with one agent for China and one agent for Bangladesh. They know the local context very well and they are familiar with our fair wear engagement. Factories were visited in China, Bangladesh and Turkey. Only our supplier in Pakistan was not yet visited, due to the travel advise for Pakistan. Our new supplier in India will be visited soon.

In 2018 we introduced a formal procedure to accept new suppliers. In the meanwhile, this 'new supplier procedure' is fully internalized in our buying department and resulted in some clear sourcing decisions: some factories in China and Bangladesh, proposed by agents, were refused as a new supplier based on unsatisfactory audit reports or because the factories did not want to produce in spirit of the Bangladesh Accord.

Our sourcing process

Supplier relations

New suppliers always need to sign the FWF Code of Labour Practice and to fill in the FWF questionnaire on production location information. They must display the Code of Labour practices at the work floor in the local language, at a visible, private place for employees, where they can read it privately.



We ask also for a performed audit report, which needs to have a positive evaluation. If they are not compliant with crucial issues - like respect for legal minimum wages, reasonable overtime, no child labour,... we will not start with this factory. For Bangladeshi partners, we inform them on our role as signatory of the 'Accord on Fire and Building Safety in Bangladesh'. We can only enter a partnership if also the supplier is a partner of the Accord and is open for inspections and remediation. New suppliers will not be registered in our buying system and orders cannot be placed, before we have received all this info.

From our external producers, from who we purchase mainly safety shoes but also textiles, we expect quality, but also trust, respecting commitments and CSR engagement. They are asked to fill out the FWF questionnaire for external producers. In this way we know which initiatives they take to monitor labour conditions in their supply chains. Some of them are also member of Fair Wear Foundation.

Our sourcing process

Integration of monitoring activities and sourcing decisions



New supplier

Each new supplier needs to sign the FWF Code of Labour Practice and to fill in the questionnaire on production location data. A “due diligence check” will be done, based on performed audit reports. If a new supplier refuses to sign or to post the Code of Labour Practices, or if he is not transparent on the production locations, we will not work with this supplier. In 2018-2019, our new suppliers in Tunisia, Bangladesh and India signed and posted the Code of Labour Practices.



Other suppliers

For other suppliers, if key issues are found during an audit or serious issues are reported within the complaint procedure, our company will immediately start an open discussion with the supplier to see how it can be solved, and which immediate actions are possible. A plan of action will be set up together with the supplier and followed very closely by Belconfect.

Our company will stop placing orders in case of unwillingness to improve, unwillingness to negotiate and set up a corrective action plan, or in case of refusal to take actions.



Our sourcing process

In 2018, we received a negative audit report for one of our Tunisian suppliers. We went into dialogue with the factory manager to improve the topics mentioned by the auditors, and we did not increase orders before improvements would be made.



Finally, we had to decide that the factory management was not willing to make social and safety improvements, so we decided to stop this business relationship. During the due diligence process we did for Bangladesh in 2018, we discovered that four factories were not willing to comply with the standards of the Bangladesh Accord on Fire and Building Safety.

As Belconfect signed the new Bangladesh Accord that started in May 2018, we could not work with these suppliers anymore. So in 2019 we decided to work in Bangladesh only through one agent, who is very familiar with the FWF and Accord standards. Based on audit results of our new Bangladeshi production unit, we can be sure now on good and safe working conditions in the factory.

Furthermore, our CSR advisor informs the CEO and buyers on possible risks, for example on the changed context in Turkey. As millions of Syrian refugees live and work in Turkey now, there is an increased risk for illegal Syrian workers and child labour in the Turkish garment sector.

Belconfect discussed this topic with its Turkish suppliers and received sufficient guarantees that they are not working with illegal Syrian workers.



This was also confirmed by an audit we did in 2019 at our main Turkish supplier. The audit report stated that this factory performed outstanding in comparison with the average Turkish fashion factory.

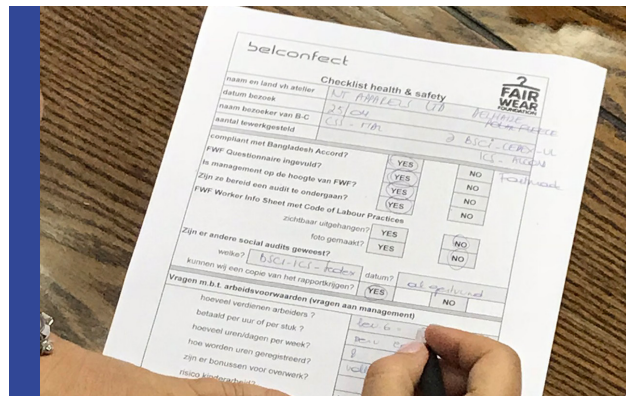
Coherent system for monitoring and remediation

FWF Code of Labour Practices

Belconfect makes use of a coherent monitoring program, which includes factory audits, the follow up of corrective action plans, informing agents, manufacturers and their employees about the Code of Labour Practices, questionnaires, a complaints procedure for workers, and factory visits.

All our current manufacturers have received a letter and a questionnaire to inform them about the FWF Code of Labour Practices, which implies international labour standards including human rights, labour rights, child labour, forced labour, working time, wages and compensation, working safety including health and safety. By filling out and signing the questionnaire, they endorse the labour standards of the Code of Labour Practices. All current manufacturers must display the Code of Labour Practices at the work floor in the local language, at a visible, private place for employees, where they can read it privately. During audits and during visits by Belconfect staff, this is verified and followed up.

CSR is now a standard topic during all factory visits. In 2018-2019, we visited suppliers in Tunesia, Turkey, Portugal, Albania, China and Bangladesh. We also use a Health & Safety Checklist during factory visits. This is a useful tool to have a Health & Safety overview, and if there are points for improvement, these are quickly detected, named, and resolved.



Coherent system for monitoring and remediation

Audits

Audits are based on the FWF Code of Labour Practices. In 2018-2019, we further increased the number of social audits. Belconfect can ensure the thresholds of 80% of the production being audited during the third year of membership.

We did a new audit at our main Turkish supplier in June 2019. The factory is a relatively small unit of fewer than 60 persons, but according to the auditor it is clearly a good factory. Much better than most “apartment factories” commonly found in Istanbul. Related to health & safety, there are some automated extinguishers for electrical panels, there is a better chemical awareness than usual, there are proper health inspection, there is safety training, the workshops are clean and ventilated but there was no foam type extinguisher and one exit was found blocked. So these are attention points for improvement.

The factory scored positive on working times and wages. The factory has only very few overtime hours, and not for all workers. So clearly that’s better than usual as regular weekly overtime is frequent in garment industry in Turkey. Moreover, the wages are not lower than usual despite the lower working time. Actually, it is quite the opposite as most workers are able to get about TL 3000 or more which is about the level of the living wages. Furthermore, the factory is paying the social insurances based on the full wages (and not only on the legal minimum as usual in Turkey). So that’s another positive point.

Another audit was implemented in one of our Tunisian production units that was not yet audited before. It is a very small production unit with only 30 people. Positive was that the workers were satisfied with this factory, and that the working time seems reasonable. But also some significant problems were found: there was in general a lack of documentation by the management. Workers for example confirmed they never received payslips. Wages are too low and some basic health & safety requirements like fire extinguishers and emergency lights are missing. So we had to give a clear signal to the factory management that follow up of the Corrective Action Plan is crucial. We discussed the Corrective Action Plan with the factory management during a factory visit.

Both audits were done by Wethica, an independent audit company that is familiar to audit according to the high level FWF standards (www.wethica.com).

One audit in 2019 was a verification audit at a Tunisian supplier, done by FWF. The audit results were overall positive. Main points for follow up in the Corrective Action Plan are the need for installation of a fire alarm system and blocked emergency exits. We will do the follow up of the CAP together with another FWF member.

Coherent system for monitoring and remediation

Positive Outcome

A positive outcome in all audits at our Tunisian suppliers is that excessive overtime – which is a very common bottleneck in textile industry – was shown to be no real issue in our production locations in Tunisia.

- ➔ As we work project based, we do not have strict deadlines for the production units. We also communicate always very clearly with the supplier on the production time that is needed, without an absolute deadline. It is an advantage that our production locations do not need to work under pressure.
- ➔ For smaller suppliers, who are not yet audited by FWF or Wethica, we always ask for other available audit reports. In this case, most factories send us a BSCI or Sedex audit report. We use the Audit Quality Assessment Tool of Fair Wear Foundation to screen the quality and value of these audit reports.

➔ Audit reports executed by FWF or Wethica are always sent to the CEO and CSR adviser. After receiving an audit report, Belconfect discusses the results with the supplier. In case of the Tunisian audits in 2018, the CEO and Procurement Manager travelled to Tunisia to discuss the results directly with the suppliers. For suppliers in other countries, follow up was done by email conversations.

Corrective Action Plans

As member of FWF, we take up the responsibility to follow up the audits and to improve bottlenecks that come out of audits.

Beginning 2018, three important audits took place in our main production locations in Tunisia (three factories that produce almost 100% for Belconfect and that produce together almost 50% of our FOB production). Several important follow up issues came out of the audits: health & safety issues, need for improvements regarding fire security, time registration, hygiene, missing pay slips, no worker representation,... So in 2018-2019, we continued to work on the follow up of the Corrective Action Plans of our main suppliers in Tunisia.



Challenges

We travelled to Tunisia to discuss the audit results with the factory managers of the three units audited in 2018 and the two units audited in 2019. One of our most important production units received in 2018 a compliance level score 'unsatisfactory', so we invested most time in follow up of this audit. Together with the factory management, we analyzed the audit results and the proposal of Corrective Action Plan. Together we went through salary slips, internal documents and social security documents.

We discussed the investments that were needed in fire safety, installation of a time registration machine, repair of toilets, hygienic needs, appointment of worker representatives, ... We agreed on a timing to complete the corrective action plan. Belconfect also decided to co-invest in the remediation costs: 70% financed by Belconfect, 30% by the supplier. We will pay in tranches every time new remediations are implemented.

Final Results

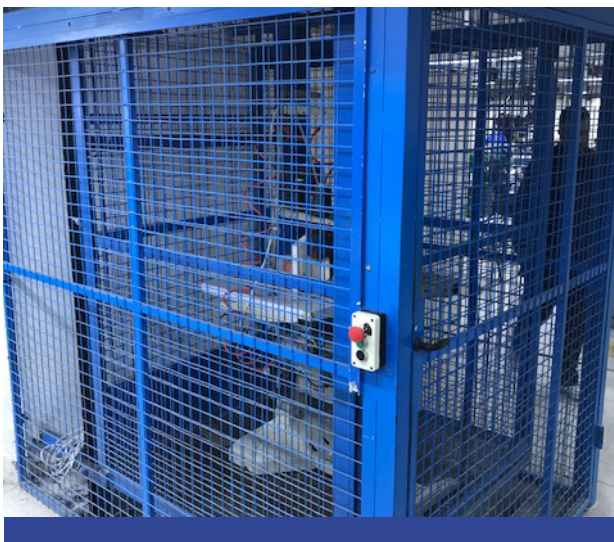
Thanks to a close follow up of the Corrective Action Plan, and due to constructive dialogue with and willingness from the supplier, in four months time this supplier made an important leap forward.

- ➔ A time registration machine is installed, a fire alarm and fire extinguishers are present now,...
- ➔ Toilets got renewed and toilet doors were repaired, emergency exits are brought in line with legal requirements,...
- ➔ Payment slips are distributed, a worker representative is appointed,...
- ➔ This Tunisian production unit also started an extra production line for Belconfect.

Coherent system for monitoring and remediation

Furthermore, we made a Health & Safety check questionnaire for staff visiting factories, to keep the supplier also attentive on these issues between audits, and to react immediately if there are incomplanes.

Between on-site visits, we communicate by email with our suppliers or agents to get updates on the CAPs and to ask for updated pictures. If they come up with updates, we give them feedback and we encourage them to continue.



The second supplier that was audited in 2018, received a very positive result. With this supplier, we could go to a next level: we discussed what a living wage is, and the supplier show us significant evidence that correct wages are paid. We will further elaborate on this topic with the FWF tools that were presented during the FWF living wage seminar in Tunisia.

The third supplier that was audited in 2018, and who received a negative audit report, was not willing to improve at all. So as mentioned earlier, we finally stopped our business relation with this supplier.

We gave a clear signal to our Tunisian suppliers that social compliance is an important requirement for Belconfect. We will reward production units that perform well and we will give clear signals to factories that do not take up the Corrective Action Plan.

We will continue to invest in the close follow up of the CAP as part of every regular contact with suppliers, in Tunisia and in other production countries. The CEO and procurement manager are always involved, supported by our CSR advisor.

On-site visits are planned on a regular basis (in Tunisia at least ten times per year), and the CAP is now always an important topic on the agenda.



Complaints procedure

We use the FWF helpline and complaints procedure offered to FWF members.



All current factories have send us pictures to prove that the FWF Code of Labour Practices (that includes the complaints number) was displayed at the work floor in the local language and available to all employees. This is checked during audits and by Belconfect staff when visiting the factories. This is also a requirement for new suppliers, since beginning 2018 an order can only be possible after we receive a picture of the Code posted in the factory.

Our CEO, in consultation with our CSR Advisor, is responsible for dealing with complaints from workers or their representatives against their employer within the supply chain of Belconfect. We want to do everything within our power to resolve a complaint in a timely manner, in close cooperation with FWF. We will always guarantee anonymity of the worker or representative during the complaints procedure. We will also further invest in making the complaint procedure better known to workers. In spring 2019, a Worker Education Program training, in which the complaint procedure is explained to workers, took place at our main Tunisian supplier.

In 2018-2019 neither Belconfect nor FWF's country contact persons received complaints from factory workers or management involved in our supply chain.

New suppliers are always informed by Belconfect on FWF membership through the questionnaire and explaining our FWF membership and the Code of Labor Practices during meetings and through information by email.

Training and capacity building

New suppliers are always informed by Belconfect on FWF membership through the questionnaire and explaining our FWF membership and the Code of Labor Practices during meetings and through information by email. The code and the contact details of the complaints handler are posted in the factory in the local language. This is monitored in the audits and during factory visits.

As a follow up of the audits done in 2018 in our production units in Tunisia, we conducted in 2019 training sessions as part of FWF's Workplace Education Program (WEP) at our main Tunisian factory, to train manufacturers and workers on the content and practice of the Code of Labor Practices.

We also continued to invest in training and communication with our agents who are in control of our Far East production. We inform them on the Code of Labor Practices, the due diligence procedure that we introduced for new suppliers, CAP monitoring, ... For an effective follow up and remediation process, it is important that also our agents are familiar with Belconfect's fair wear engagements, as we expect them to discuss CAP issues with our suppliers in China and Bangladesh.

To keep our staff in our HQ in Dottignies informed, our fair wear engagement and progress is discussed in monthly staff meetings. Our new buyer was also trained in the FWF living wage seminar in Tunisia.



Transparency and communication

We believe in an open and transparent communication with our suppliers. There are several ways through which the Code of Labor Practices is communicated to manufacturers and workers: distribution of questionnaire and lead letter, visits to suppliers to explain Belconfect's FWF engagement,... As our number of suppliers is limited, we prefer discussions on CSR matters during face-to-face discussions in a constructive dialogue.

Towards our customers, we communicate on our FWF membership during company powerpoint presentations, in our brochures, and through our website (where also the Brand Performance Check Report is published). By the end of 2019, we will publish our brand new corporate website, where our sustainability engagements will be more visible and explained to everyone who is interested to know more.

In June 2019, we gave a presentation on our fair wear engagements at Prenne (an important fair related to safety & prevention @ work). In september, we gave a presentation on our fair wear engagement at a meeting of Brussels and local authorities.



Social and environmental engagements

We are moving forward step by step in this project to realize a circular economy.

01

Fairtrade@work

Belconfect wants to support fair trade throughout our own supply chain, but also in our head office in Dottignies. We joined Fairtrade@work, an initiative of Fairtrade Belgium that stimulates the consumption of more fair trade products on the work floor.

02

Sustainable in a circular economy

Belconfect is an important link in the value chain of high-quality and functional safety workwear, made in ethically correct production units. In addition, we are also active in various sector related initiatives with focus on using sustainable materials, transparency in the supply chain, CO2 reduction and striving for circular solutions.

03

New initiatives

More information on our initiatives to limit our ecological footprint can be found on our website www.belconfect.be





Our objective is to generate a positive social and ecological dynamic with every economic impulse.

Belconfect is committed to communicating in a uniform and transparent manner about economic, environmental and social performance, to both internal and external stakeholders.



We focus on 4 important CSR reports: Ecovadis where we obtained the Ecovadis Gold Label, CSR scan according to ISO 26000 guideline, sustainability report according to the GRI guideline and a social reporting that is part of our Fair Wear Foundation involvement.

it's not about
ideas, it's
about making
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**Your reliable partner for workwear
and safety shoes.**



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