



BRAND PERFORMANCE CHECK

Filippa K AB

PUBLICATION DATE: FEBRUARY 2014

this report covers the evaluation period 01-01-2012 to 31-12-2012

ABOUT THE BRAND PERFORMANCE CHECK

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

FWF's Brand Performance Check is a tool to evaluate and report on the activities of FWF's affiliate members. The Checks examine how affiliate management systems support FWF's Code of Labour Practices.

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

Even if outcomes at the factory level cannot be guaranteed, the importance of good management practices by affiliates cannot be understated. Even one concerned customer at a factory 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 factory 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.

Improvement of supply chains is a step-by-step process, through which affiliates must address many different issues. FWF affiliates vary greatly in management structures, and have different strengths. The Performance Benchmarking system is designed to reflect these differences, and the many different ways that a company can support better working conditions.

During the Brand Performance Check, FWF staff speak to various employees at the affiliate who have important roles to play in the management of supply chains. FWF verifies the actions of affiliates based on several sources including documentation of activities, financial records, the affiliate's supplier register and staff interviews. Following the Brand Performance Check, FWF summarizes findings in this report, which is made public via www.fairwear.org. The [Brand Performance Check Guide](#) provides more information about the indicators and is available for download.

BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

19-08-2013

Conducted by:

Annabel Meurs

Interviews with:

Elin Larsson (Corporate Responsibility manager)

Doreen Chiang (Sourcing Manager)

Hedwig Kajblad (product developer)

Anna-Karin Bons (product developer)

Scoring:

Affiliate Benchmarking scores and Performance Benchmarking categories will be published starting in 2014. During 2013, FWF will be testing out the new system and evaluating the appropriate threshold levels for Benchmarking categories.

Audit Summary:

Publication of the audit summary section previously included in Brand Performance Checks has been suspended while Fair Wear Foundation develops a new information system to manage and summarize the data. Future Brand Performance Checks will include improved usability and transparency for audit data.

AFFILIATE INFORMATION	
Headquarters:	Stockholm
Member since:	01-03-2008
Product types:	Fashion
Production in countries where FWF is active:	Portugal, Italy, China, India, Romania, Viet Nam, Lithuania, Turkey
Production in other countries:	Spain, Slovakia, Sweden, Germany, Estonia, Morocco
BASIC REQUIREMENTS	
Workplan for this evaluation period was submitted?	Yes
Projected supplier register for this evaluation was submitted?	Yes
Actual supplier register for this evaluation period has been submitted?	Yes
Membership fee has been paid?	Yes
All suppliers have been notified of FWF membership?	Yes
SCORING OVERVIEW	
% of own production under monitoring	91%

Summary:

Filippa K meets most of FWF's management system requirements. The company focuses on creating long-term relationships and has a long history with a majority of its suppliers, a few of them have been working with the company for more than ten years. In 2012, Filippa K introduced a new evaluation method of suppliers by using a scorecard with quality measures, delivery precision, transparency and social compliance. A majority of Filippa K purchasing volume comes from suppliers located in low risk countries. With its auditing and other monitoring efforts, the company has monitored over 90% of their supply chain and therefore meets FWF's monitoring threshold. Filippa K can make steps towards analysing the root causes of excessive overtime and how this relates to its own buying practices. In addition, the company can make sure workers and managers at their suppliers are aware of their rights by taking part in the training programme, which the company is set out to do from 2013 onwards.

1. PURCHASING PRACTICES

BASIC MEASUREMENTS	RESULT	COMMENTS
Percentage of production in low-risk countries	59%	Countries with relatively low risk of labour violations as defined by FWF.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION
1.1 Percentage of production volume from suppliers where affiliate buys at least 10% of production capacity	52%	Affiliates with less than 10% of a factories' production capacity generally have limited influence on factory managers to make changes.	Supplier register provided by affiliate.

Recommendation: FWF recommends Filippa K to consolidate its supplier base where possible, and increase leverage at main supplier(s) to effectively request improvements of working conditions.

Comment: In the assessed period, Filippa K bought 52% of its supplier volume from factories where the company has substantial leverage (at least 10% of the factory production capacity). The company's objective is to further deepen the cooperation with selected key suppliers over the years.

1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years	66%	Stable business relationships support most aspects of the Code of Labour Practices, and give factories a reason to invest in improving working conditions.	Supplier register provided by affiliate.
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Comment: 66% of Filippa K's 2012 purchasing volume is coming from suppliers where the relationship is longer than 5 years. The company focuses on creating long-term relationships based on honesty and openness. Filippa K has a long history with a majority of its suppliers, a few of them have been working with the company for more than ten years. This enables the company to effectively request improvements in working conditions.

1.3 Labour conditions are considered when selecting new suppliers	Yes	Including labour conditions considerations in selecting suppliers supports responsible business practices.	Documentation of decisionmaking process; e.g. checklists for buyers, emails, etc.
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Recommendation: FWF recommends Filippa K to cooperate with local stakeholders to further investigate the situation in a specific country. FWF advises affiliates to use information from FWF country studies and wage ladders. A risk analysis as part of the decision-making process of selecting new suppliers is an important step to mitigate risk and prevent potential problems.

Comment: The choice of selecting new suppliers is made by the supply department, in the beginning of the design process. They select the supplier most suitable for each product, to make sure each product gets the optimal condition. Quality is the main criteria. To assess the level of working conditions, the company takes several steps: all new suppliers are visited, a survey and the questionnaire is sent, research is done in to other clients and existing audit reports are collected.

1.4 All new suppliers are required to sign and return the Code of Labour Practices before first orders are placed	Yes	The CoLP is the foundation of all work between factories and brands, and the first step in developing a commitment to improvements.	Signed CoLPs are on file.
1.5 Company conducts audits at all new suppliers before placing orders	Yes	An important due diligence step. Before placing production orders, affiliates should conduct an audit at all new suppliers to assess risks for CoLP violations.	Audit documentation; must meet FWF audit quality standards.

Comment: Pre-audits were done occasionally but not structurally. When prototypes are approved, Filippa K aims to plan an audit as soon as possible.

1.6 Affiliate sources from an FWF factory member	No	When possible, FWF encourages affiliates to source from FWF factory members. The small number of factories in the programme means sourcing from FWF factory members cannot be a requirement.	Supplier register provided by affiliate.
1.7 Percentage of production volume from factories owned by the affiliate	0%	Owning a supplier provides clear accountability for and direct influence over working conditions. It reduces the risk of unexpected CoLP violations.	Supplier register provided by affiliate.

1.8 Supplier compliance with Code of Labour Practices is evaluated in a systemic 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.
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Recommendation: FWF advises to define clear steps in the evaluation method to incorporate social compliance information into sourcing and monitoring decisions. In other words, decide on how to track progress and define what happens if a supplier is under-performing or performing exceptionally well. How does that impact the sourcing decisions? This way, the company can consistently evaluate the entire supplier base and include information into decision-making procedures.

Comment: Social compliance is integrated into Filippa K's business practices. At the end of 2012, the company started to develop a new evaluation method of suppliers by using scorecards on a yearly basis including quality measures, delivery precision, transparency, CoC compliance and understanding of Filippa K values.

1.9 The affiliate's production planning systems support reasonable working hours	Strong integrated systems in place	Affiliate production planning systems can have a significant impact on the levels of excessive overtime at factories.	Documentation of robust planning systems.
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Comment: Filippa K has a detailed production timeplan with deadlines that are set in cooperation with suppliers. The company's planning strategy is written down in policies, taking efforts to reduce overtime into consideration. It describes how the company can better spread their production and work with carry-over collections that are produced over three seasons. Production for own retail can be better controlled: Filippa K can place orders in advance on estimated sales figures. In some cases the company has direct contact with the mills to facilitate the fabric planning.

Filippa K makes use of block orders with never out of stock items to reserve capacity and to avoid most of the immediate pressure for deliveries.

1.10 Percentage of production volume from suppliers where excessive overtime is found by FWF	64%	Excessive overtime is one of the most common labour rights violations in high-risk production countries. It is often caused by poor production planning by brands.	Audits conducted by FWF auditors; Complaints filed via the FWF worker helpline.
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Comment: The majority of the audits conducted by FWF teams in 2012 showed excessive overtime took place. At only audited supplier in Romania no excessive overtime was found.

1.11 Degree to which affiliate analyses and mitigates root causes of excessive overtime	Reactive approach	Affiliate production planning systems can have a significant impact on the levels of excessive overtime at factories.	Examples of root cause analyses and resulting changes in production planning/policy.
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Recommendation: Filippa K can conduct a brand level research on the contributing factors of overtime in production factories where excessive overtime was found. Filippa K should identify strategies to minimise the impact of its sourcing practice on excessive overtime. The company could discuss with factory management on the causes of excessive overtime and provide support to manage overtime. If necessary, the affiliate could hire local experts to analyse root cause of excessive overtime in cooperation with the supplier. FWF could recommend qualified persons upon request.

Comment: Despite a good production planning system, there can still be many other reasons for excessive overtime. Excessive overtime took place at a few suppliers where Filippa K is sourcing. Filippa K is in process of discussing on management team level how to spread production and reduce overtime. The example was used of one factory audited by FWF in Vietnam.

1.12 Affiliate's pricing policy allows for payment of at least the legal minimum wages in production countries	Policy at a country level	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.
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Recommendation: Filippa K can start by working on transparent prices with all suppliers to get a better insight in the cost of labour and the share that goes to workers. Filippa K needs to develop a pricing policy where they know the labour cost of garments and which allows the payment of at least legal minimum wages in production countries.

Comment: Filippa K uses the Wage Ladder tool as an indication for wages in a specific country. Target price for each product is set in the beginning of the collection process to secure the optimal sourcing of material, accessories and supplier. In some cases the target price is changed along the way to ensure that the product reaches the company's quality standards. The cost of labour is not known.

1.13 Affiliate actively responds if suppliers fail to pay legal minimum wages	Yes	If a supplier fails to pay minimum wage, FWF affiliates 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.
1.14 Evidence of late payments to suppliers by affiliate	No	Late payments to suppliers can have a negative impact on factories 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 factory and affiliate financial documents.
1.15 Degree to which affiliate assesses root causes of wages lower than living wages with suppliers	Factory level approach	Sustained progress towards living wages requires adjustments to affiliates' policies.	Wage ladders, correspondence with supplier, other relevant documentation.

Recommendation: FWF encourages Filippa K 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.

Comment: Filippa K uses the Wage Ladder tool to discuss living wage benchmarks with its suppliers.

Additional comments on Purchasing Practices:

Filippa K is in process of shifting their models from linear production to circular production – a closed loop mindset. The company 'rethinks, redesigns and rebuilds many of its processes and structures' to be part of the circular economy, where nothing goes to waste. The sustainability targets are set to be fulfilled 2030;

- Full transparency in supply chains
- Total compliance to Filippa K Code of Conduct

2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
Total % of own production under monitoring	91%	Measured as a percentage of turnover.
Minimum monitoring threshold based on years of membership (Threshold is 40% first year, 60% second year of membership and 90% thereafter)	Does meet threshold	

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION
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 Degree of progress towards resolution of existing Corrective Action Plans	Moderate efforts have been made to address most CAPs	FWF considers efforts to resolve CAPs to be one of the most important things that affiliates can do towards improving working conditions.	Documentation of remediation and followup actions taken by affiliate.

Recommendation: Coordinated efforts between different departments are required to ensure sustained responses to CAPs.

Besides doing audits once in 3 years, Filippa K could consider:

- Hire 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.

Comment: Filippa K indicated several findings of Corrective Action Plans have been remediated. The company feels it has improved most issues that are realistic in the short terms, but struggles with the complex issues such as living wages and freedom of association.

2.3 Percentage of production volume from suppliers that have been visited by the affiliate in the past financial year	72%	Formal audits should be augmented by annual visits by affiliate staff or local representatives. They reinforce to factory managers that affiliates are serious about implementing the Code of Labour Practices.	Affiliates should document all factory visits with at least the date and name of the visitor.
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Recommendation: FWF recommends the CSR manager to instruct colleagues to use visits as opportunities to discuss problems and corrective actions in the time period between formal audits.

Comment: The majority of suppliers are visited by buyers, the purchasing manager, CSR manager or supply chain manager.

2.4 Existing audit reports are collected	Yes and quality assessed	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.
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2.5 Audit Report and Corrective Action Plan (CAP) findings are shared with factory. Improvement timelines are established in a timely manner	Yes	FWF audit reports should be shared and discussed with suppliers within two months of audit receipt. Timely sharing of information and agreement on corrective actions is essential for improvement. A reasonable time frame should be specified for resolving findings.	Corrective Action Plans, emails; findings of followup audits; brand representative present during audit exit meeting, etc.
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2.6 A structured approach is used to address issues that occur at multiple suppliers	Yes	Issues that occur in multiple factories often need to be addressed in a systemic manner, especially when the root causes are located in brand management choices or from regionally specific issues (e.g. fire safety, gender discrimination and harassment).	Documentation of a systemic approach: root cause analyses, productivity assessments, guidance documents, internal system changes, etc.
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Comment: Filippa K is in the process of reorganizing its production department. All buyers are responsible for monitoring working conditions at suppliers in their product group. If issues occur at one factory, they evaluate whether purchasing decisions need to be adjusted. Buyers discuss non-compliances with each other in order to see how colleagues deal with certain situations.

2.7 Affiliate cooperates with other customers in resolving corrective actions at shared suppliers	Active cooperation	Cooperation between customers increases leverage and chances of successful outcomes. Cooperation also reduces the changes 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.
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Comment: Filippa K has shared audit reports and cooperated with other FWF affiliates.

2.8 Monitoring requirements are fulfilled for production in low-risk countries	Yes	Low risk countries are determined by the presence and proper functioning of institutions which can guarantee compliance with basic standards.	Documentation of visits, notification of suppliers of FWF membership; posting of worker information sheets, completed questionnaires.
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2.9 External brands resold by the affiliate who have completed and returned the external brand questionnaire. (% of external sales volume)	No external brands resold	FWF believes it is important for affiliates that have a retail/wholesale arm to at least know if the brands they resell are members of FWF or a similar organisation, and in which countries those brands produce goods.	Questionnaires are on file.
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<p>2.10 External brands resold by affiliates that are members of another credible initiative. (% of external sales volume)</p>	<p>No external brands resold</p>	<p>FWF believes affiliates who resell products should be rewarded for choosing to stock external brands who also take their supply chain responsibilities seriously.</p>	<p>Supplier register; Documentation of sales volumes of products made by FWF or FLA members.</p>
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3. COMPLAINTS HANDLING

BASIC MEASUREMENTS	RESULT	COMMENTS
Number of worker complaints received since last check	1	At this point, FWF considers a high number of complaints as a positive indicator, as it shows that workers are aware of and making use of the complaints system.
Number of worker complaints in process of being resolved		
Number of worker complaints resolved since last check		

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION
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.
3.2 System exists 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 factory visits, etc.
3.3 Percentage of audited factories where at least half of workers are aware of the FWF worker helpline	47%	The FWF complaints procedure is a crucial element of verification. If factory-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.	Percentage of audited factories where at least 50% of interviewed workers indicate awareness of the FWF complaints mechanism.

Comment: Two audits by FWF in China showed workers were not sufficiently aware of the Code of Labour Practices. At the suppliers in Vietnam, the subcontractors were not informed.

3.4 All complaints received from factory workers are addressed in accordance with the FWF Complaints Procedure	Yes	Involvement by the FWF affiliate is crucial in resolving a complaint at a supplier.	Documentation that affiliate has completed all required steps in the complaints handling process.
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Comment: FWF received one complaint from a worker of a supplier in China. The worker complained about working on national holiday without receiving the correct compensation. Filippa K immediately responded and investigated the complaint in cooperation with FWF. See the detailed report here:

<http://www.fairwear.org/ul/cms/fck-uploaded/documents/complaints/2012/FilippaKComplaintsreportChinanov2012.pdf>

3.5 Cooperation with other customers in addressing worker complaints at shared suppliers	Active cooperation	Because most factories supply several customers with products, involvement of other customers by the FWF affiliate can be critical in resolving a complaint at a supplier.	Documentation of joint efforts, e.g. emails, sharing of complaint data, etc.
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4. TRAINING AND CAPACITY BUILDING

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION
4.1 Staff at affiliate is made aware of FWF membership requirements	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.

Comment: Staff at Filippa K is informed of FWF membership requirements. The company has regular supply meetings with different departments. Filippa K distributes a monthly newsletter to all employees around Europe including store employees. The newsletter contains a 'Corporate Responsibility' section where topics regarding sustainability are presented.

4.2 Advanced training is provided to staff in direct contact with suppliers on CoLP 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.
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Comment: Staff of Filippa K participated in a made by workshop on environmental aspects. A training was also given by the Sustainable Fashion Academy for buyer and sales staff: it covered responsible sourcing, communicating about CSR and design issues. Staff of Filippa K also participated in the FWF seminar.

4.3 Agents are informed of CoLP requirements and act to support their implementation	Yes	Agents have the potential to either support or disrupt CoLP implementation. It is the responsibility of affiliate to ensure agents actively support the implementation of the CoLP.	Correspondence with agents, trainings for agents, FWF audit findings.
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Comment: After the requirement in last performance check, Filippa K has actively worked on having their agents support the implementation of the CoLP and on ensuring the Filippa K values are translated to their suppliers. Agent support the monitoring efforts by providing follow up. There has been one example with an audit in Romania in 2012, where the audit process and FWF approach was not effectively communicated by the agent to the suppliers.

4.4 Factory participation in Workplace Education Programme (where WEP is offered; by production volume)	0%	Lack of knowledge on best practices related to labour standards is a common issue in factories. Good quality training of workers and managers is a key step towards sustainable improvements.	Documentation of relevant trainings; participation in Workplace Education Programme.
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Requirement: All factory workers should be informed about the labour standards and the process of monitoring and remediation. In order to further communication between employers and workers in the workplace, FWF developed the Workplace Education Programme in 4 priority countries. The affiliate should motivate its main supplier(s) to join WEP trainings.

Comment: No training as part of FWFs Workplace Education Programme took place yet. Filippa K started enrolling suppliers in the training in 2013.

4.5 Factory participation in trainings (where WEP is not offered; by production volume)	0%	In areas where the Workplace Education Programme is not yet offered, affiliates may arrange trainings on their own. Trainings must meet FWF quality standards to receive credit for this indicator.	Curricula, other documentation of training content, participation and outcomes.
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Recommendation: In order to further communication between employers and workers in the workplace FWF recommends affiliates to arrange trainings on their own in areas where the Workplace Education Programme is not yet offered.

Trainings must meet FWF quality standards to receive credit for this indicator: top management, supervisors and workers should be included in the trainings, separately. Workplace standards and dispute handling should be included in the training. At least 10-20% of the workforce must be trained, depending on the size of the factory. Worker participations should be balanced and representative.

5. INFORMATION MANAGEMENT

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION
5.1 Supplier register for the previous financial year is verified as being complete and accurate	Yes	Any improvements to supply chains require affiliates to first know all of their suppliers.	Completed supplier register; Financial records of previous financial year.

Recommendation: FWF encourages the process of Filippa K to map their supply chain, including fabric and mills/tanneries. This way, suppliers and subcontractors are included in the monitoring and sourcing decisions of Filippa K.

5.2 A system exists to allow purchasing, CSR and other relevant staff to share information with each other about working conditions at suppliers	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.
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Comment: Filippa K has a strong integrated system within the production department. CSR and monitoring of working conditions is the responsibility of each buyer in charge of a specific product type. Information is share in a coherent way to establish an effective strategy to work on improvements.

6. TRANSPARENCY

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION
6.1 Communication about FWF membership adheres to the FWF communications policy	Yes	FWF membership should be communicated in a clear and accurate manner. FWF guidelines are designed to prevent misleading claims.	Logo is placed on website; other communications in line with policy. Affiliates may lose points if there is evidence that they did not comply with the communications policy.

Comment: Filippa K communicates about its core values, responsibility and FWF membership on the corporate website.

6.2 Affiliate engages in advanced reporting activities	No	Good reporting by members helps to ensure the transparency of FWF's work and shares best practices with the industry.	Affiliate publishes one or more of the following on their website: Brand Performance Check, Audit Reports, Supplier List.
6.3 Social Report is submitted to FWF and is published on affiliate's website	Yes	The Social Report is an important tool for brands to transparently share their efforts with stakeholders.	Report adheres to FWF guidelines for Social Report content.

7. EVALUATION

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION
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.
7.2 Percentage of required changes from previous Brand Performance Check implemented by affiliate	80%	In each Brand Performance Check report, FWF may include requirements for changes to management practices. Adherence to these requirements is an important part of FWF membership.	Affiliate should show documentation related to the specific requirements made in the previous Brand Performance Check.

Comment: Filippa K has improved monitoring code implementation with agents. The company has also follow up requirements to follow up corrective actions and to improve its system to check whether the CoLP is posted. Moreover, communication about FWF membership on the company's website has improved.

RECOMMENDATIONS TO FWF

Filippa K hopes FWF continues to convince affiliates to be transparent and open about their supplier information. Filippa K would appreciate support in building an online system to track supplier information.