

BRAND PERFORMANCE CHECK

Stanley and Stella S.A.

PUBLICATION DATE: SEPTEMBER 2016

this report covers the evaluation period 01-01-2015 to 31-12-2015

ABOUT THE BRAND PERFORMANCE CHECK

Fair Wear Foundation believes that improving conditions for apparel factory workers requires change at many levels. Traditional efforts to improve conditions focus primarily on the factory. FWF, however, believes that the management decisions of 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. They evaluate the parts of affiliate 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 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.

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 affiliate 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 <u>www.fairwear.org</u>. The online <u>Brand Performance</u> <u>Check Guide</u> provides more information about the indicators.



BRAND PERFORMANCE CHECK OVERVIEW

Stanley and Stella S.A. Evaluation Period: 01-01-2015 to 31-12-2015

| AFFILIATE INFORMATION | |
|--|--|
| Headquarters: | Brussels, Belgium |
| Member since: | 15-12-2011 |
| Product types: | Fashion, Workwear, Promotional, Corporate wear |
| Production in countries where FWF is active: | Bangladesh, China, Turkey |
| Production in other countries: | 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 |
| All suppliers have been notified of FWF membership? | Yes |
| SCORING OVERVIEW | |
| % of own production under monitoring | 100% |
| Benchmarking score | 83 |
| Category | Leader |

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Summary:

Stanley & Stella S.A. (hereafter Stanley & Stella) meets FWF's requirements regarding the implementation of FWF's Code of Labour Practices and goes beyond. Stanley & Stella has monitored 100% of its production in the last three years. The brand purchases over 90% of its production volume from suppliers where they have significant leverage. The brand prefers to establish long term relationships and develop together with suppliers once a business relation has started. Of the total FOB, 30% comes from suppliers where a business relationship exists since Stanley & Stella came into operation.

Stanley & Stella has an office in Bangladesh where they produce more than 90% of the FOB. The local office visits the factories frequently to follow up on corrective action plans from FWF audit reports. Gradually increasing wages and reducing overtime are issues included in the discussions though they are major challenges to most factories.

Stanley & Stella meets FWF's requirements on establishing an enhanced monitoring system. The local Bangladesh office urges and supports the factories to improve fire and building safety based on audit reports from the Accord. With the support of the FWF local team and Stanley & Stella, two factories have set up functioning anti-harassment committees. These committees negotiate with factory management to handle workplace grievances. Most suppliers of Stanley & Stella in Bangladesh have participated in the Workplace Education Programme and in the fire and building management workshop organised by FWF.

In the next financial year, Stanley & Stella is recommended to take a step further to work towards payment of living wages and addressing excessive overtime at the suppliers.

PERFORMANCE CATEGORY OVERVIEW

Leader: This category is for affiliates 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 affiliates who are making a serious effort to implement the Code of Labour Practices—the vast majority of FWF affiliates—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 affiliates will receive a 'Good' rating.

Needs Improvement: Affiliates 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. Affiliates 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: Affiliates 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. Affiliates 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 |
|--|--------|---|---|-------|-----|-----|
| 1.1 Percentage of production volume from suppliers where affiliate buys at least 10% of production capacity | 93% | Affiliates with less than 10% of a factories' production capacity generally have limited influence on factory managers to make changes. | Supplier information provided by affiliate. | 4 | 4 | 0 |
| 1.2 Percentage of production volume from suppliers where a business relationship has existed for at least five years | 30% | Stable business relationships support most aspects of the Code of Labour Practices, and give factories a reason to invest in improving working conditions. | Supplier information provided by affiliate. | 2 | 4 | 0 |

Recommendation: Stanley & Stella is recommended to continue its business relation with existing suppliers to build long term relationships.

Comment: Stanley & Stella was set up in 2011. The business is in operation for less than 5 years itself. According to FWF's policy, this indicator is changed to be 'the percentage of suppliers where a business relationship has existed since the member company was established'.

| 1.3 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. | 2 | 2 | 0 |
|--|-----|--|---------------------------|---|---|---|
|--|-----|--|---------------------------|---|---|---|

Comment: There were two new suppliers in 2015. Both of them had signed and returned the Code of Labour Practices.

| 1.4 Company conducts human rights due Yes diligence at all new suppliers before placing orders. | Due diligence helps to identify, prevent and mitigate potential human rights problems at new suppliers. | Documentation may include pre-audits, existing audits, other types of risk assessments. | 4 | 4 | 0 |
|---|---|---|---|---|---|
|---|---|---|---|---|---|



Comment: Stanley & Stella visits all suppliers before starting the first order. When a potential supplier is identified, the sourcing manager visits the location and discusses with the factory on FWF's requirements. Audit reports by other initiatives are also collected as a method to assess the compliance status of the factory. Commitments to improve labour conditions and sharing the values of Stanley & Stella are important criteria for the brand. Stanley & Stella requested a FWF audit at new suppliers as soon as possible to identify gaps for improvement.

| 1.5 Supplier 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: Stanley & Stella evaluates suppliers based on a number of criteria: strategy, environment, social compliance, health and safety, quality, technology, planning, logistics, finances, legal issues, etc. According to Stanley & Stella, social compliance is a significant indicator when evaluating suppliers. An annual workshop is conducted to discuss the evaluation of all suppliers. Departments involved in sourcing and sustainability, designing, logistics take part in the meeting. In 2015 Stanley & Stella phased out one supplier due to low performance and unwillingness to cooperate.

Comment: Stanley & Stella shares its annual production planning with suppliers in advance. According to the brand, it is important to link production scheduling to yarn availability. When yarn is prepared by Stanley & Stella in advance, the suppliers will have sufficient time to plan production. Stanley & Stella has monthly discussions with suppliers on the need of yarns based on stock level. This will gather information to forecast production orders, confirm production orders and make advanced yarn booking. Sometimes special colour or special yarns have to come from a different country. Six months advanced planning is essential to reduce material delay, which is one of the risk factors for overtime at factories.



Stanley & Stella assesses the production capacity of the suppliers before placing an order. Regular orders are placed monthly based on agreements. As Stanley & Stella produces products for stock, it is not necessary to request urgent orders from suppliers.

Frequent communication with suppliers also contributes to reducing the risks of excessive overtime. Stanley & Stella has a local office in Bangladesh. The local staff visits the factories daily to discuss on production. In case there is a delay, the brand's headquarter will be informed timely to adjust. Since Stanley & Stella does not produce urgent orders, delays from the suppliers side are accepted as long as suppliers communicate in advance.

| 1.7 Degree to which affiliate mitigates root causes of excessive overtime. | Intermediate efforts | Some production delays are outside of the control of affiliates; however there are a number of steps that can be taken to address production delays without resorting to excessive overtime. | Documentation of root cause analysis and positive steps taken to manage production delays or improve factory processes. | 3 | 6 | 0 | |
|--|-------------------------|--|---|---|---|---|--|
|--|-------------------------|--|---|---|---|---|--|

Recommendation: Stanley & Stella is recommended to conduct overtime root causes analysis at brand level and at factory level to find out more. When assessing capacity of factories, the brand should make sure the capacity is based on regular working hours. Only when overtime root causes are addressed, it is possible to reduce overtime at the factories.

Comment: Excessive overtime was found at four suppliers audited by FWF in 2015. Levels of overtime in the factories are about the average in the production countries. In order to reduce excessive overtime, Stanley & Stella has taken the following steps:

- 1. When capacity of the factory is not enough, the brand can adjust or re-arrange the orders.
- 2. Applying advanced yarn booking to make sure materials come on time.
- 3. In case the supplier is late, as long as the communication is good and the brand knows it in advance, there will be no penalty.
- 4. The brand has standard lead time for production:
- In China it is 120 days, and in Portugal it is 90-120 days.

| 1.8 Affiliate's pricing policy allows for payment of at least the legal minimum | Country-level policy | The first step towards ensuring the payment of minimum wages - and towards | Formal systems to calculate labour | 2 | 4 | 0 |
|---|-------------------------|--|--|---|---|---|
| wages in production countries. | portog | implementation of living wages - is to know the labour costs of garments. | costs on per-product or country/city level. | | | |

Recommendation: When Stanley&Stella is able to investigate further and determine more precisely the labour minute costs for its products, it should have a better understanding whether its FOB prices support payment of at least minimum wages, and moving towards living wages

Comment: Stanley & Stella uses open costing system to negotiate prices with suppliers. In such system, cut & make cost, material cost and factory margin are known to both sides. When there is a change in material or labour costs, the factories could use the information to negotiate a higher price. On the other hand, Stanley & Stella could have sufficient information to judge if the price is reasonable. Stanley & Stella estimates that labour cost is about 60% of cut & make cost. However the relation between workers' wages and cut & make cost is not yet known.

Stanley & Stella is aware of local minimum wages. The company does not change suppliers based on the price. It prefers to develop the skills and capacities of the suppliers.

| 1.9 Affiliate actively responds if suppliers fail to pay legal minimum wages. | No minimum wage problems reported | 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. | 2 | 2 | -2 |
|--|--|---|---|---|---|----|
| 1.10 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 | Based on a complaint or audit report; review of factory and affiliate financial | 0 | 0 | -1 |

in payments can cause serious problems.

documents.

Recommendation: Fair Wear Foundation encourages Stanley&Stella to discuss with suppliers about possibilities to work towards higher benchmarks of living wages. Stanley & Stella could consider to join FWF's living wage challenge project to advance towards paying living wages.

Comment: The wage ladder is part of the discussions for Stanley & Stella when following up on corrective action plans from audit reports. Factories producing from Stanley & Stella paid at least minimum wages to workers. The open costing system provides information to Stanley & Stella to estimate the labour cost per garment. Stanley & Stella could show that the price increases when minimum wage increases.

| 1.12 Affiliate sources from an FWF factory member. | No | When possible, FWF encourages affiliates to source from FWF factory members. On account of the small number of factories this is a 'bonus' indicator. Extra points are possible, but the indicator will not negatively affect an affiliate's score. | Supplier information provided by affiliate. | N/A | 1 | 0 |
|---|------|--|--|-----|---|---|
| 1.13 Percentage of production volume from factories owned by the affiliate. | 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 affiliate's score. | Supplier information provided by affiliate. | N/A | 2 | 0 |

PURCHASING PRACTICES

Possible Points: 40 Earned Points: 28



2. MONITORING AND REMEDIATION

| BASIC MEASUREMENTS | RESULT | COMMENTS |
|---|--------|--|
| % of own production under standard monitoring (excluding low-risk countries) | 99% | |
| % of own production in low risk production countries where FWF's Low Risk policy has been implemented | 0% | FWF low risk policy should be implemented. $0 = policy$ is not implemented correctly. N/A = no production in low risk countries. |
| Total of own production under monitoring | 100% | Minimums: 1 year: 40%; 2 years 60%; 3 years+: 90% 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 | Уes | 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 |

| 2.2 Degree of progress towards resolution of Intermediate existing Corrective Action Plans | 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. | 4 | 8 | -2 | |
|--|--|--|---|---|----|--|
|--|--|--|---|---|----|--|

Comment: Stanley & Stella only uses FWF audit team to conduct audits at their suppliers. When the factory is located in Bangladesh, the local office discuss the CAPs with the factory management directly and regularly during their visits. Discussion details are documented. Issues regarding health and safety and contracts are resolved after discussions. Issues on overtime and wages are more difficult to solve.

In countries other than Bangladesh, the brand communicates with the suppliers via email and phone calls to follow up. The production staff visits the factories at least once a year and discusses directly with the management on social compliance.

| 2.3 Percentage of production volume from suppliers that have been visited by the affiliate in the past financial year | 100% | 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. | 4 | 4 | 0 |
|---|--|--|---|-----|---|----|
| 2.4 Existing audit reports from other sources are collected. | No existing reports/all audits by FWF or FWF affiliate | 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. | N/A | 3 | 0 |
| 2.5 Audit Report and Corrective Action Plan (CAP) findings are shared with factory. 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 |
| 2.6 High risk issues specific to the affiliate's supply chain are identified and addressed by the monitoring system. | Advanced Capacity | Different countries and products have different risks associated with them; monitoring systems should be adapated to allow appropriate human rights due diligence for the specific risks in each affiliates' supply chain. | Documentation may take many forms; additional research, specific FWF project participation; extra monitoring activities, extra mitigation activities, etc. | 6 | 6 | 0 |

Comment: About 1% of Stanley & Stella's FOB is produced in China. As the majority of the production is in Bangladesh, the brand focuses its effort on the suppliers there.

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Stanley & Stella has a system in China to manage the risk of unauthorised subcontracting. All suppliers in China have been audited by FWF. In addition, buying department staff visits the production site when production is going on. This is to make sure the products are in fact produced in factories under the monitoring system.

| | Advanced Capacity | Affiliates sourcing in Bangladesh should take additional action to address both building and fire safety and the prevention of violence against women. | Building, electrical and fire safety inspection reports, evidence of cooperation with other customers sourcing at the same factories (Accord signatories and/or FWF affiliates), etc. | 3 | 3 | 0 |
|--|----------------------|---|--|---|---|---|
|--|----------------------|---|--|---|---|---|

Comment: Stanley & Stella has a local office in Bangladesh. The local office visits each suppliers at least weekly. When production is going on, they visit daily. According to FWF's enhanced monitoring system, the member brands are expected to work on reducing violence against women at the workplace and supporting suppliers to improve fire and building safety. Stanley & Stella has demonstrated sufficient effort to meet the requirements of FWF. The results are as follows:

- All but one suppliers in Bangladesh have attended FWF's Workplace Education Programme to set up antiharassment systems. Two factories are good-practice factories on anti-harassment because there are functional Anti-harassment committees. The committees have been able to discuss with factory management and solve complaints from workers, with the support of FWF local trainers.

- All suppliers have been audited by the Accord on fire and building safety. Even though Stanley & Stella is not an Accord signatory, it has collected the audit reports and discussed with factories to support remediation.

- All suppliers have participated FWF's management workshop on fire and building safety.

- As a policy, Stanley & Stella's local staff visits the factory whenever the brand's production is running at the factory. Besides to meet the need of quality control, this is also to prevent unauthorised subcontracting.

| 2.6b High risk issues specific to Myanmar are identified and adressed by the monitoring system and remediation activities. | Not sourcing in Myanmar | Myanmar is still in the process of establishing the legal and civil society infrastructure needed to ensure compliance with labour rights. Extra care must be taken when doing business in Myanmar. | Shared CAPs, Wage Ladders per factory. | N/A | 3 | 0 |
|--|---|--|---|-----|---|----|
| 2.7 Affiliate cooperates with other customers in resolving corrective actions at shared suppliers | No CAPs active or no shared suppliers. | 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. | N/A | 2 | -1 |
| 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. | 2 | 2 | 0 |

Comment: Less than one percent of the FOB is made in Portugal. Stanley & Stella staff visits the factory at least once a year. The code of labour practices has been posted at the factory.

| 2.9 External brands resold by the affiliate who have completed and returned the external brand questionnaire. (% of external sales volume) | FWF believes it is important for affiliates that have a retail/wholesale arm to at least know if the brands they resell are members of FWF or a similar organisation, and in which countries those brands produce goods. | Questionnaires are on file. | N/A | 3 | 0 | |
|---|--|--------------------------------|-----|---|---|--|
|---|--|--------------------------------|-----|---|---|--|



| 2.10 External brands resold by affiliates that are members of another credible initiative. (% of external sales volume) | No external brands resold | FWF believes affiliates who resell products should be rewarded for choosing to stock external brands who also take their supply chain responsibilities seriously. | External production data in FWF's information management system. Documentation of sales volumes of products made by FWF or FLA members. | N/A | 3 | 0 | |
|---|------------------------------|--|--|-----|---|---|--|
|---|------------------------------|--|--|-----|---|---|--|

MONITORING AND REMEDIATION

Possible Points: 27

Earned Points: 23





3. COMPLAINTS HANDLING

| BASIC MEASUREMENTS | RESULT | COMMENTS |
|--|--------|--|
| Number of worker complaints received since last check | 2 | 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 | 2 | |

| 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 |

| 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. | 2 | 2 | 0 | |
|--|-----|---|---|---|---|---|--|
|--|-----|---|---|---|---|---|--|

| 3.3 Percentage of FWF-audited factories 66% where at least half of workers are aware of the FWF worker helpline. | 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. Factory participation in the Workplace Education Programme also count towards this indicator. | Percentage of audited factories where at least 50% of interviewed workers indicate awareness of the FWF complaints mechanism + percentage of factories in WEP programme. | | 4 | -2 |
|--|---|---|--|---|----|
|--|---|---|--|---|----|

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Recommendation: Stanley & Stella has made considerable effort to support suppliers in setting up antiharassment systems. The brand is encouraged to take a step further to help more supports in having good internal grievance system in place.

Comment: All suppliers in Bangladesh have participated in the workplace education programme. Two suppliers have set up Antiharassment systems. The functional antiharassment committees are in contact with workers to solve their complaints with the support of FWF's local trainer. It is believed that workers from these two factories are aware of and thus have more access to FWF's complaints system compared to other factories.

| 3.4 All complaints received from factory workers are addressed in accordance with the FWF Complaints Procedure | Providing access to remedy when problems arise is a key element of responsible supply chain management. Affiliate involvement is often essential to resolving issues. | Documentation that affiliate has completed all required steps in the complaints handling process. | 6 | 6 | -2 | |
|--|--|--|---|---|----|--|
|--|--|--|---|---|----|--|

Comment: One of the complaints was about compensation for working during holidays. A worker said that the factory did not pay him for his holiday work in December 2015. The factory explained that the payment was late and made the payment immediately after hearing the complaint. Stanley & Stella discussed with the management as well as the anti-harassment committee to improve the internal complaint system.

The other complaint was about health and safety. A worker informed FWF that two workers died at work on the same day during working hours in February 2015. Many workers also reported feeling sick soon after hearing the news. Police had conducted an investigation and concluded that the deceased workers did not die from occupational disease or injury. The other workers returned back to work a couple days after. The complaint was solved. However Stanley & Stella could not follow up to improve the internal grievances system of the factory. Stanley & Stella stopped sourcing from the factory later in 2015, as the factory preferred to end the relationship due to capacity overbook. At the same time, the factory could not meet Stanley & Stella's expectation to join FWF's workplace education programme.



| 3.5 Cooperation with other customers in addressing worker complaints at shared suppliers | No complaints or cooperation not possible / necessary. | 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. | N/A | 2 | -2 | |
|--|--|---|---|-----|---|----|--|
|--|--|---|---|-----|---|----|--|

COMPLAINTS HANDLING

Possible Points: 13

Earned Points: 12



4. TRAINING AND CAPACITY BUILDING

| PERFORMANCE INDICATORS | RESULT | RELEVANCE OF INDICATOR | DOCUMENTATION | SCORE | MAX | MIN |
|--|--------|---|---|-------|-----|-----|
| 4.1 All staff 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. | 1 | 1 | -1 |
| 4.2 Ongoing training in support of FWF requirements is provided to staff in direct contact with suppliers. | 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 | 0 |

Comment: Buying department and communication department are in frequent contact with FWF to update their knowledge on FWF's requirements. Induction training for new staff includes FWF and its methodology. There is a monthly newsletter to increase awareness among employees on sustainability. Information about FWF is published in the newsletter.

| 4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices. | Affiliate does not use agents | 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. | N/A | 2 | -2 |
|---|-------------------------------------|---|--|-----|---|----|
| 4.4 Factory participation in Workplace Education Programme (where WEP is offered; by production volume) | 93% | Lack of knowledge and skills on best practices related to labour standards is acommon 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. | 6 | 6 | 0 |

| 01 | ction is ^D areas. | In areas where the Workplace Education Programme is not yet offered, affiliates 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. | N/A | 4 | 0 | |
|----|---------------------------------|---|---|-----|---|---|--|
|----|---------------------------------|---|---|-----|---|---|--|

TRAINING AND CAPACITY BUILDING

Possible Points: 9

Earned Points: 9



5. INFORMATION MANAGEMENT

| PERFORMANCE INDICATORS | RESULT | RELEVANCE OF INDICATOR | DOCUMENTATION | SCORE | MAX | MIN |
|---|----------|---|--|-------|-----|-----|
| 5.1 Level of effort to identify all production locations | Advanced | Any improvements to supply chains require affiliates to first know all of their production locations. | Supplier information provided by affiliate. Financial records of previous financial year. Documented efforts by affiliate to update supplier information from its monitoring activities. | 6 | 6 | -2 |

Comment: Stanley & Stella demonstrates sufficient effort to control subcontracting. The brand has less than 10 suppliers. There is a policy that responsible staff need to be physically in the factory when production is going on. Sometimes subcontracting is unavoidable due to specific production requirements. For example, when the supplier does not have a laundry facility, the factory needs to use another factory to do laundry. The factory can discuss with Stanley & Stella and the brand will include the subcontractor in its monitoring system.

| 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. | 1 | 1 | -1 |
|---|-----|---|--|---|---|----|
|---|-----|---|--|---|---|----|

Comment: Sourcing and CSR department are integrated together. All sourcing staff need to be aware of compliance status of the factories. When sourcing staff visit factories, they also discuss with factory management on social compliance. Information of compliance is shared with communication and marketing staff as well.



INFORMATION MANAGEMENT

Possible Points: 7 Earned Points: 7



6. TRANSPARENCY

| PERFORMANCE INDICATORS | RESULT | RELEVANCE OF INDICATOR | DOCUMENTATION | SCORE | MAX | MIN |
|--|--------|---|--|-------|-----|-----|
| 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. | 1 | 1 | -2 |

Comment: Being in the leader category, Stanley & Stella is allowed to use on garment communication about its FWF membership.

| 6.2 Affiliate engages in advanced reporting activities | 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. | 1 | 1 | 0 |
|---|---|---|---|---|---|
|---|---|---|---|---|---|

Comment: Brand performance check report is published in the website of the member brand.

| 6.3 Social Report is submitted to FWF and is | Published on | The Social Report is an important tool for | Report adheres to | 2 | 2 | -2 |
|--|--------------|---|------------------------|---|---|----|
| published on affiliate's website | affiliate's | affiliates to transparently share their efforts | FWF guidelines for | | | |
| | website | with stakeholders. | Social Report content. | | | |



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TRANSPARENCY

Possible Points: 4

Earned Points: 4



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: Being a FWF member is part of the strategy of Stanley & Stella. At least once a year top management is involved in the evaluation of FWF membership.

| 7.2 Changes from previous Brand Performance Check implemented by affiliate | No requirements were included in previous Check | In each Brand Performance Check report, FWF may include requirements for changes to management practices. Progress on achieving these requirements is an important part of FWF membership and its process approach. | Affiliate should show documentation related to the specific requirements made in the previous Brand Performance Check. | N/A | 4 | -2 | |
|---|--|---|---|-----|---|----|--|
|---|--|---|---|-----|---|----|--|

EVALUATION

Possible Points: 2

Earned Points: 2



RECOMMENDATIONS TO FWF

N/A

BRAND PERFORMANCE CHECK - STANLEY AND STELLA S.A. - 01-01-2015 TO 31-12-2015 F



SCORING OVERVIEW

| <u>, X X X X X X X X X X X X X X X X X X X</u> | <u> </u> | <u> </u> | \underline{XX} |
|--|----------|---------------------|------------------------------|
| CATEGORY | EARNED | POSSIBLE | |
| Purchasing Practices | 28 | 40 | |
| Monitoring and Remediation | 23 | 27 | |
| Complaints Handling | 12 | 13 | |
| Training and Capacity Building | 9 | 9 | |
| Information Management | 7 | 7 | |
| Transparency | 4 | 4 | |
| Evaluation | 2 | 2 | |
| Totals: | 85 | 102 | |
| $\overline{}$ | | ${\longrightarrow}$ | $\overline{\mathbf{\nabla}}$ |

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

83

PERFORMANCE BENCHMARKING CATEGORY

Leader



BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

09-09-2016

Conducted by:

Juliette Li

Interviews with:

Amandine Martin, Communication Manager Massimo di Matteo, Customer Care Manager Bahtisen Yarol, Accountant Sebastien Coussieu, Sourcing Specialist Geert de Wael, Sourcing, Sustainability & Quality Manager

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.

