



# BRAND PERFORMANCE CHECK

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Star Sock B.V.

PUBLICATION DATE: JUNE 2018

this report covers the evaluation period 01-01-2017 to 31-12-2017

## ABOUT THE BRAND PERFORMANCE CHECK

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

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

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

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

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

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

## BRAND PERFORMANCE CHECK OVERVIEW

Star Sock B.V.

Evaluation Period: 01-01-2017 to 31-12-2017

MEMBER COMPANY INFORMATION	
Headquarters:	Oisterwijk, Netherlands
Member since:	01-02-2015
Product types:	Socks
Production in countries where FWF is active:	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
SCORING OVERVIEW	
% of own production under monitoring	100%
Benchmarking score	79
Category	Leader

## Summary:

Star Sock has shown progress and met most of FWF's performance requirements in 2017. In its third year of membership, a monitoring percentage of 100% and a benchmark score of 79 means that FWF has awarded Star Sock the 'Leader' rating.

Star Sock works with a small supplier base and visits all production locations on average three times a year. A difficult year financially impacted Star Sock's number of orders and therefore the relationship with its suppliers. Despite this, the implementation of FWF requirements and follow-up of CAPs is continually on the agenda with factory management. Star Sock's local teams in China and Turkey visit the factories during production on a weekly basis and are also involved in addressing social issues during these visits.

Star Sock has developed a clear process on due diligence and risk assessment when selecting new suppliers, which includes evaluation of potential suppliers by top management. However, due to Star Sock's small supplier base, compliance with Code of Labour Practices is still evaluated in a more informal way and does not yet influence production decisions. Through its solid monitoring system and process to follow-up on audit findings, Star Sock has a good understanding of the root causes of the major issues at a factory-level in China. Regardless of knowledge gained through this process, the company together with the factories had difficulty finding the right solutions to issues in China such as excessive overtime, wages below living wages and the fact that social security is not always paid. FWF recommends cooperating with other customers at the factories to increase leverage, when trying to mitigate findings such as excessive overtime.

In previous years, Star Sock implemented strong systems for monitoring and remediation in China, including a pricing policy, production planning system and method to identify all subcontractors. Despite its relatively low FOB and leverage, Star Sock should begin to implement the same systems for its production locations in Turkey. At a minimum, this should involve utilising the Audit Quality Assessment Tool to analyse external audit reports collected for its Turkish suppliers. FWF audits at existing or new suppliers in Turkey, will also give Star Sock better insight into country specific risks, wages levels and how its own purchasing decisions are influencing factory conditions.

## PERFORMANCE CATEGORY OVERVIEW

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

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

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

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

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

## 1. PURCHASING PRACTICES

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.1a Percentage of production volume from production locations where member company buys at least 10% of production capacity.	73%	Member companies with less than 10% of a production location's production capacity generally have limited influence on production location managers to make changes.	Supplier information provided by member company.	3	4	0

Comment: Star Sock buys 73% of its production volume from suppliers where it buys at least 10% of the production capacity, all of which are based in China. A difficult year financially impacted Star Sock's number of orders and the relationship with its suppliers, therefore this figure has decreased slightly from last year.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.1b Percentage of production volume from production locations where member company buys less than 2% of its total FOB.	2%	FWF provides incentives to clothing brands to consolidate their supplier base, especially at the tail end, as much as possible, and rewards those members who have a small tail end. Shortening the tail end reduces social compliance risks and enhances the impact of efficient use of capital and remediation efforts.	Production location information as provided to FWF.	3	4	0

Comment: 5% of Star Sock's production volume comes from production locations where it buys less than 2% of its total FOB. This figure has decreased from last year and now consists of just one supplier in Turkey.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.2 Percentage of production volume from production locations where a business relationship has existed for at least five years.	57%	Stable business relationships support most aspects of the Code of Labour Practices, and give production locations a reason to invest in improving working conditions.	Supplier information provided by member company.	3	4	0

Comment: 57% of production was from suppliers where Star Sock has had a relationship for at least five years. It is Star Sock's aim to build long-lasting, durable relationships with all its suppliers.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.3 All new production locations are required to sign and return the questionnaire with the Code of Labour Practices before first bulk orders are placed.	No new production locations added in past financial year	The CoLP is the foundation of all work between production locations and brands, and the first step in developing a commitment to improvements.	Signed CoLPs are on file.	N/A	2	0

Comment: Star Sock has a system in place to ensure information on social compliance is collected before bulk orders are placed at new suppliers. Besides filling in the FWF questionnaire, Star Sock also asks production locations to fill in a self-assessment, which covers FWF labour standards as well.

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

Comment: Star Sock has a clear process on selecting new suppliers, describing what needs to be done prior, during and after visiting the factory. This process begins by collecting as much information on FWF labour standards as possible. Star Sock makes use of the FWF Country Studies and risk policies to address country specific risks, such as Syrian refugees in Turkey and (unknown) subcontracting. It shares the Health & Safety Checklist with suppliers for a self-assessment and collects existing social audit reports for evaluation. Star Sock visits all production locations before production starts and ensures the information it has collected is discussed with factory management. After the factory visit, Star Sock shares a self-assessment questionnaire with suppliers, which also covers FWF labour standards. A sourcing trip evaluation is conducted with top management before orders are placed.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.5 Production location compliance with Code of Labour Practices is evaluated in a systematic manner.	Yes	A systemic approach is required to integrate social compliance into normal business processes, and supports good decisionmaking.	Documentation of systemic approach: rating systems, checklists, databases, etc.	1	2	0

**Comment:** Star Sock makes use of a supplier rating system, although the system is more focused on each supplier's performance in communication, delivery, quality etc. Star Sock decided to stop production at one of its production locations because its lack of transparency and communication skills. However, due to Star Sock's small supplier base, compliance with Code of Labour Practices is still evaluated in a more informal way, making use of the supplier's self-assessment questionnaire, through discussing progress on CAPs and evaluation of factory visits.

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

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.6 The member company's production planning systems support reasonable working hours.	Strong, integrated systems in place.	Member company production planning systems can have a significant impact on the levels of excessive overtime at production locations.	Documentation of robust planning systems.	4	4	0

**Comment:** In collaboration with its suppliers, Star Sock has developed a detailed tool to calculate the hours needed to complete each order, including production, packing and delivery time. They have a clear understanding of the lead times for each production country and the overall capacity of their suppliers. In the sock industry, Star Sock does not face production pressures such as peak seasons. However, as an intermediary, it is dependent on its clients demands. Using this tool, Star Sock is able to better control its production planning and be strict on reasonable lead times. While this is a good step forward to supporting reasonable hours of work, excessive overtime was found during audits at two of Star Sock's Chinese suppliers in 2017.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.7 Degree to which member company mitigates root causes of excessive overtime.	Intermediate efforts	Some production delays are outside of the control of member companies; however there are a number of steps that can be taken to address production delays without resorting to excessive overtime.	Evidence of how member responds to excessive overtime and strategies that help reduce the risk of excessive overtime, such as: root cause analysis, reports, correspondence with factories, etc.	3	6	0

**Comment:** Star Sock knows the root causes of excessive overtime and is in constant dialogue with its Chinese suppliers to address this. However, with the little leverage the company has it has difficulty realising actual change. It also conducted a WEP training to actively promote transparency regarding working hours at a Chinese supplier in 2017, following an audit finding of excessive overtime.

**Recommendation:** FWF recommends cooperating with other customers at the factory to increase leverage, when trying to mitigate excessive overtime hours.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.8 Member company's pricing policy allows for payment of at least the legal minimum wages in production countries.	Country-level policy	The first step towards ensuring the payment of minimum wages - and towards implementation of living wages - is to know the labour costs of garments.	Formal systems to calculate labour costs on per-product or country/city level.	2	4	0

**Comment:** For its production in China, Star Sock does a cost calculation per style and has good insight into what the actual production costs are. Using a tool provided by FWF, Star Sock conducted a calculation to translate piece rate into monthly wages. It concluded that based on a normal work week, wages are above legal minimum wage and sit around the industry average. This was also shown in the wage ladder data collected for audits at two of Star Sock's Chinese suppliers in 2017. In Turkey, Star Sock have gathered external audit reports and determined that wages are at least above legal minimum wage.

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

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

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.10 Evidence of late payments to suppliers by member company.	No	Late payments to suppliers can have a negative impact on production locations and their ability to pay workers on time. Most garment workers have minimal savings, and even a brief delay in payments can cause serious problems.	Based on a complaint or audit report; review of production location and member company financial documents.	0	0	-1

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.11 Degree to which member company assesses root causes of wages lower than living wages with suppliers and takes steps towards the implementation of living wages.	Production location level approach	Sustained progress towards living wages requires adjustments to member companies' policies.	Documentation of policy assessments and/or concrete progress towards living wages.	4	8	0

**Comment:** Star Sock knows the root causes of wages lower than a living wage in China and is in constant dialogue with its Chinese suppliers to address this. Using a tool provided by FWF, Star Sock conducted a calculation to translate piece rate into monthly wages and to see what it means to pay workers' wages while on statutory holidays. Star Sock also calculated what its own contribution would need to be in order to reach a living wage level. With the little leverage the company has it has difficulty realising actual changes, but this is constantly on their agenda.

In Turkey, Star Sock have gathered external audit reports and determined that wages are at least above legal minimum wage. It is yet to initiate discussion on wages with its Turkish suppliers.

**Requirement:** Star Sock has to take adequate steps to move towards living wages as estimated by local stakeholders at all of its suppliers. Therefore, it should begin to take an active role in discussing living wages with its suppliers in Turkey.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.12 Percentage of production volume from factories owned by the member company (bonus indicator).	None	Owning a supplier increases the accountability and reduces the risk of unexpected CoLP violations. Given these advantages, this is a bonus indicator. Extra points are possible, but the indicator will not negatively affect an member company's score.	Supplier information provided by member company.	N/A	2	0

## PURCHASING PRACTICES

Possible Points: 42

**Earned Points: 29**

## 2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	62%	
% of production volume where monitoring requirements for low-risk countries are fulfilled	14%	FWF low risk policy should be implemented. 0 = policy is not implemented correctly. N/A = no production in low risk countries.
Meets monitoring requirements for tail-end production locations.	Yes	
Total of own production under monitoring	100%	Minimums: 1 year: 40%; 2 years 60%; 3 years+: 80-100% Measured as a percentage of turnover.

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

Comment: Multiple people within Star Sock work to follow-up on problems identified by its monitoring system, including the Sourcing Manager, the local QC teams and Star Sock's owner.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.2 Quality of own auditing system meets FWF standards.	Member makes use of FWF audits and/or external audits only	In case FWF teams cannot be used, the member companies' own auditing system must ensure sufficient quality in order for FWF to approve the auditing system.	Information on audit methodology.	N/A	0	-1

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.3 Audit Report and Corrective Action Plan (CAP) findings are shared with factory and worker representation where applicable. Improvement timelines are established in a timely manner.	Yes	2 part indicator: FWF audit reports were shared and discussed with suppliers within two months of audit receipt AND a reasonable time frame was specified for resolving findings.	Corrective Action Plans, emails; findings of followup audits; brand representative present during audit exit meeting, etc.	2	2	-1

Comment: The Sourcing Manager at Star Sock shares the audit findings with factory and timelines are established in a timely manner.

Recommendation: In case worker representation is applicable, Star Sock should ensure the CAP is shared with worker representatives and involve them in setting the timeframe for realising improvements.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.4 Degree of progress towards resolution of existing Corrective Action Plans and remediation of identified problems.	Intermediate	FWF considers efforts to resolve CAPs to be one of the most important things that member companies can do towards improving working conditions.	CAP-related documentation including status of findings, documentation of remediation and follow up actions taken by member. Reports of quality assessments. Evidence of understanding relevant issues.	6	8	-2

**Comment:** Star Sock discusses the CAPs during factory visits and records progress in supplier visit reports. The knowledge of Star Sock and factory management on the main audit findings keeps improving through consistent discussions and follow-up. There is a clear understanding of the root causes of the major issues at a factory-level within Star Sock, but the company together with the factories has difficulty finding the right solutions to issues such as overtime, wages below living wages and the fact that in China social security is not always paid.

In 2017, two FWF audits were conducted at Star Sock’s suppliers in China and some of the issues found were: worker representatives/committees not functioning and the use of possible home workshops. Star Sock encouraged the factory to establish a functioning worker committee and could show evidence of committee meetings taking place. Furthermore, Star Sock investigated the use of home workshops for its production, completing a Health & Safety Checklist and questionnaire. Star Sock keeps a record of all known subcontractors and are planning to include these in the monitoring system in future.

**Recommendation:** Despite its relatively low FOB and leverage, Star Sock should begin to implement the same systems it has developed in China, for its production locations in Turkey.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.5 Percentage of production volume from production locations that have been visited by the member company in the previous financial year.	100%	Formal audits should be augmented by annual visits by member company staff or local representatives. They reinforce to production location managers that member companies are serious about implementing the Code of Labour Practices.	Member companies should document all production location visits with at least the date and name of the visitor.	4	4	0

**Comment:** On average Star Sock’s production locations are visited three times a year by its Sourcing Manager and/or owner. In China and Turkey, its production and QC staff visit the factories during production on a weekly basis.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.6 Existing audit reports from other sources are collected.	Yes, quality assessed and corrective actions implemented	Existing reports form a basis for understanding the issues and strengths of a supplier, and reduces duplicative work.	Audit reports are on file; evidence of followup on prior CAPs. Reports of quality assessments.	3	3	0

**Comment:** Star Sock collects existing audit reports for all its production locations (including low risk) and does an informal evaluation of the findings. Although the FWF audit quality assessment tool is not utilised, there is clear understanding within Star Sock on the quality of the reports, from working with FWF audits and from their knowledge of country specific risks. The external reports and the clear gaps in information, is then used as a basis to begin discussion with suppliers. Follow-up and progress on findings is recorded in supplier visit reports.

Star Sock concedes its efforts in Turkey are not as extensive as in China.

**Recommendation:** FWF recommends Star Sock to utilise the audit quality assessment tool, to gain further insight into the quality of the external reports collected.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.7 Compliance with FWF risk policies.	Average score depending on the number of applicable policies and results	Aside from regular monitoring and remediation requirements under FWF membership, countries, specific areas within countries or specific product groups may pose specific risks that require additional steps to address and remediate those risks. FWF requires member companies to be aware of those risks and implement policy requirements as prescribed by FWF.	Policy documents, inspection reports, evidence of cooperation with other customers sourcing at the same factories, reports of meetings with suppliers, reports of additional activities and/or attendance lists as mentioned in policy documents.	5	6	0
Compliance with FWF enhanced monitoring programme Bangladesh	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF Myanmar policy	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on abrasive blasting	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on risks related to Turkish garment factories employing Syrian refugees	Intermediate			3	6	-2
Other risks specific to the member's supply chain are addressed by its monitoring system	Advanced			6	6	-2

**Comment:** Star Sock is aware of the risks related to Syrian refugees in Turkey. The FWF policy is utilised to initiate dialogue with existing suppliers and it is part of the risk assessment when selection new suppliers. A risk for the production of socks is hand linking. Star Sock has developed and implemented a policy to ban hand linking in its supply chain.

**Recommendation:** FWF recommends Star Sock to include what is expected of suppliers regarding the employment of Syrian refugees in formal agreements with its suppliers.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.8 Member company cooperates with other FWF member companies in resolving corrective actions at shared suppliers.	No CAPs active, no shared production locations or refusal of other company to cooperate	Cooperation between customers increases leverage and chances of successful outcomes. Cooperation also reduces the chances of a factory having to conduct multiple Corrective Action Plans about the same issue with multiple customers.	Shared CAPs, evidence of cooperation with other customers.	N/A	2	-1

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

**Comment:** Star Sock's suppliers in low risk country Portugal, are visited at least annually and each has signed and returned the CoLP and the questionnaire. Furthermore, Star Sock collects external audit reports for production locations in Portugal and does an informal evaluation of the findings.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.10 Extra bonus indicator: in case FWF member company conducts full audits above the minimum required monitoring threshold.	Not applicable	FWF encourages all of its members to audit/monitor 100% of its production locations and rewards those members who conduct full audits above the minimum required monitoring threshold.	Production location information as provided to FWF and recent Audit Reports.	N/A	3	0

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.11 Questionnaire is sent and information is collected from external brands resold by the member company.	No 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.	N/A	2	0

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.12 External brands resold by member companies that are members of another credible initiative (% of external sales volume).	No external brands resold	FWF believes members who resell products should be rewarded for choosing to sell external brands who also take their supply chain responsibilities seriously and are open about in which countries they produce goods.	External production data in FWF's information management system. Documentation of sales volumes of products made by FWF or FLA members.	N/A	3	0

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.13 Questionnaire is sent and information is collected from licensees.	No licensees	FWF believes it is important for member companies to know if the licensee is committed to the implementation of the same labour standards and has a monitoring system in place.	Questionnaires are on file. Contracts with licensees.	N/A	1	0

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## MONITORING AND REMEDIATION

Possible Points: 27

Earned Points: 24

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### 3. COMPLAINTS HANDLING

BASIC MEASUREMENTS	RESULT	COMMENTS
Number of worker complaints received since last check	0	At this point, FWF considers a high number of complaints as a positive indicator, as it shows that workers are aware of and making use of the complaints system.
Number of worker complaints in process of being resolved	0	
Number of worker complaints resolved since last check	0	

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.1 A specific employee has been designated to address worker complaints	Yes	Followup is a serious part of FWF membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	1	1	-1

Comment: Star Sock's Manager Customer Care is responsible for addressing worker complaints.

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

Comment: All production locations are regularly visited and during these visits it is checked that the Worker Information Sheets are in place. Star Sock have also begun to laminate the Worker Information Sheet, to ensure it lasts longer.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.3 Percentage of FWF-audited production locations where at least half of workers are aware of the FWF worker helpline.	47%	The FWF complaints procedure is a crucial element of verification. If production location based complaint systems do not exist or do not work, the FWF worker helpline allows workers to ask questions about their rights and file complaints. Production location participation in the Workplace Education Programme also count towards this indicator.	Percentage of audited production locations where at least 50% of interviewed workers indicate awareness of the FWF complaints mechanism + percentage of production locations in WEP programme.	2	4	0

Comment: Star Sock held the WEP at two of its main suppliers in China in 2016 and 2017.

Recommendation: Star Sock should stimulate its suppliers in Turkey to participate in WEP trainings, to raise awareness about the existence and the functioning of FWF's worker hotline. In addition, Star Sock can use the worker information cards available for download on FWF's website.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.4 All complaints received from production location workers are addressed in accordance with the FWF Complaints Procedure	No complaints received	Providing access to remedy when problems arise is a key element of responsible supply chain management. Member company involvement is often essential to resolving issues.	Documentation that member company has completed all required steps in the complaints handling process.	N/A	6	-2

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.5 Cooperation with other customers in addressing worker complaints at shared suppliers	No complaints or cooperation not possible / necessary	Because most production locations supply several customers with products, involvement of other customers by the FWF member company can be critical in resolving a complaint at a supplier.	Documentation of joint efforts, e.g. emails, sharing of complaint data, etc.	N/A	2	0

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## COMPLAINTS HANDLING

Possible Points: 7

Earned Points: 5

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## 4. TRAINING AND CAPACITY BUILDING

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.1 All staff at member company are made aware of FWF membership.	Yes	Preventing and remediating problems often requires the involvement of many different departments; making all staff aware of FWF membership requirements helps to support cross-departmental collaboration when needed.	Emails, trainings, presentation, newsletters, etc.	1	1	-1

Comment: During the quarterly operational meetings social topics, including FWF, are always on the agenda. Presentations on the Brand Performance Check, major achievements and challenges are shared during staff meetings or via email with the whole Star Sock team.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.2 All staff in direct contact with suppliers are informed of FWF requirements.	Yes	Sourcing, purchasing and CSR staff at a minimum should possess the knowledge necessary to implement FWF requirements and advocate for change within their organisations.	FWF Seminars or equivalent trainings provided; presentations, curricula, etc.	2	2	-1

Comment: Star Sock's has local production and QC staff in China and Turkey, who are aware of FWF requirements. Updates from FWF and other organisation's meetings/trainings are regularly shared via email or during country visits. The local teams visit the factories on a regular basis and address social issues during these visits.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices.	Member does not use agents/contractors	Agents have the potential to either support or disrupt CoLP implementation. It is the responsibility of member company to ensure agents actively support the implementation of the CoLP.	Correspondence with agents, trainings for agents, FWF audit findings.	N/A	2	0

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.4 Production location participation in Workplace Education Programme (where WEP is offered; by production volume)	55%	Lack of knowledge and skills on best practices related to labour standards is a common issue in production locations. Good quality training of workers and managers is a key step towards sustainable improvements.	Documentation of relevant trainings; participation in Workplace Education Programme.	6	6	0

Comment: Star Sock held a WEP at one of its main suppliers in China in 2017.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.5 Production location participation in trainings (where WEP is not offered; by production volume)	All production is in WEP areas.	In areas where the Workplace Education Programme is not yet offered, member companies may arrange trainings on their own or work with other training-partners. Trainings must meet FWF quality standards to receive credit for this indicator.	Curricula, other documentation of training content, participation and outcomes.	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	Intermediate	Any improvements to supply chains require member companies to first know all of their production locations.	Supplier information provided by member company. Financial records of previous financial year. Documented efforts by member company to update supplier information from its monitoring activities.	3	6	-2

**Comment:** Especially in China, production easily shifts between production locations, without initial warning to Star Sock. To tackle this, Star Sock enlisted the help of its QC officers to create an overview of all known subcontractors. During production, the QC officers visit the actual production locations and will add them to the internal list. It then asks suppliers to complete a Health & Safety self-assessment and questionnaire. In 2018, Star Sock plans to use this list to evaluate why a subcontractor is used, whether it can be used for future production and whether it requires a visit from Star Sock's Sourcing Manager. Star Sock are planning to include these locations in the monitoring system in future.

**Recommendation:** Star Sock is advised to develop a systematic approach to complete the supplier list. Part of the approach can include agreements with factories on the use of subcontractors stating clearly that when subcontractors are used, they are included in the monitoring system and information is shared on the subcontracted production process.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
5.2 CSR and other relevant staff actively share information with each other about working conditions at production locations.	Yes	CSR, purchasing and other staff who interact with suppliers need to be able to share information in order to establish a coherent and effective strategy for improvements.	Internal information system; status CAPs, reports of meetings of purchasing/CSR; systematic way of storing information.	1	1	-1

Comment: Star Sock has an internal database where FWF documentation, audit reports and other information is stored. This information is accessible to all staff. Star Sock also improved since last year, making use of the provided template to document follow-up actions on CAPs.

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## INFORMATION MANAGEMENT

Possible Points: 7

Earned Points: 4

## 6. TRANSPARENCY

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
6.1 Degree of member company compliance with FWF Communications Policy.	Minimum communications requirements are met AND no significant problems found	FWF's communications policy exists to ensure transparency for consumers and stakeholders, and to ensure that member communications about FWF are accurate. Members will be held accountable for their own communications as well as the communications behaviour of 3rd-party retailers, resellers and customers.	FWF membership is communicated on member's website; other communications in line with FWF communications policy.	2	2	-3

Comment: Star Sock communicates about FWF membership through the company's website and adheres to the FWF communications policy.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
6.2 Member company engages in advanced reporting activities	Published Performance Checks, Audits, and other efforts lead to increased transparency	Good reporting by members helps to ensure the transparency of FWF's work and shares best practices with the industry.	Member company publishes one or more of the following on their website: Brand Performance Check, Audit Reports, Supplier List.	1	2	0

Comment: Star Sock published the Brand Performance Check report on their website.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
6.3 Social Report is submitted to FWF and is published on member company's website	Complete and accurate report published on member's website	The social report is an important tool for members to transparently share their efforts with stakeholders. Member companies should not make any claims in their social report that do not correspond with FWF's communication policy.	Social report that is in line with FWF's communication policy.	2	2	-1

## TRANSPARENCY

Possible Points: 6

Earned Points: 5

## 7. EVALUATION

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

Comment: Major achievements and challenges in the CoLP implementation are discussed regularly during meetings with Star Sock's owner. A formal assessment of FWF membership takes place after the Brand Performance Check. Star Sock's owner has also begun discussing audit results with factory management, to inspire understanding and cooperation.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
7.2 Level of action/progress made on required changes from previous Brand Performance Check implemented by member company.	67%	In each Brand Performance Check report, FWF may include requirements for changes to management practices. Progress on achieving these requirements is an important part of FWF membership and its process approach.	Member company should show documentation related to the specific requirements made in the previous Brand Performance Check.	4	4	-2

Comment: The previous performance check included requirements for Star Sock to ensure new suppliers sign and return the FWF questionnaire, to ensure the Worker Information Sheet is posted in factories and to develop a systematic approach for the evaluation of suppliers. In 2017, all Star Sock's production locations were visited and during these visits it was checked that the Worker Information Sheets was in place. Star Sock also improved its process on selecting new suppliers. It now requires suppliers to not only complete the FWF questionnaire, but also complete a self-assessment, which covers FWF labour standards as well. Lastly, due to Star Sock's small supplier base, compliance with Code of Labour Practices is still evaluated in a more informal way, making use of the supplier's self-assessment questionnaire, through discussing progress on CAPs and evaluation of factory visits.

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## EVALUATION

Possible Points: 6

Earned Points: 6

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## RECOMMENDATIONS TO FWF

Star Sock requests that FWF develops strong cooperative relationships with other labour rights initiatives, such as the Dutch Agreement on Sustainable Garments and Textiles, with the aim to eliminate double up on requirements.

Currently, Star Sock's customers do not see the value in FWF membership over other initiatives. Star Sock requests that FWF work together with its member brands to promote FWF membership externally, to become a well-known, credible initiative.

## SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	29	42
Monitoring and Remediation	24	27
Complaints Handling	5	7
Training and Capacity Building	9	9
Information Management	4	7
Transparency	5	6
Evaluation	6	6
Totals:	82	104

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

79

PERFORMANCE BENCHMARKING CATEGORY

Leader

## BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

09-05-2018

Conducted by:

Emma Conos, Anne van Lakerveld

Interviews with:

Eric Roosen, Owner

Hanneke Boon, Manager Customer Care

Willem Schilders, Sourcing Manager