



Brand Performance Check

TH Clothes - Biscana

This report covers the evaluation period 01-01-2019 to 31-12-2019

About the Brand Performance Check

Fair Wear Foundation (Fair Wear) 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. Fair Wear, however, believes that the management decisions of clothing brands have an enormous influence for good or ill on product location conditions.

Fair Wear's Brand Performance Check is a tool to evaluate and report on the activities of Fair Wear's member companies. The Checks examine how member company management systems support Fair Wear'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 Fair Wear 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 Fair Wear 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 Fair Wear'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. The online [Brand Performance Check Guide](#) provides more information about the indicators.

Brand Performance Check Overview

TH Clothes - Biscana

Evaluation Period: 01-01-2019 to 31-12-2019

Member company information	
Headquarters:	Batalha , Portugal
Member since:	2018-01-01
Product types:	Promotional wear and accessories
Production in countries where Fair Wear is active:	Bangladesh, China
Production in other countries:	Pakistan, Portugal
Basic requirements	
Workplan and projected production location data for upcoming year have been submitted?	Yes
Actual production location data for evaluation period was submitted?	Yes
Membership fee has been paid?	Yes
Scoring overview	
% of own production under monitoring	84%
Benchmarking score	41
Category	Needs Improvement

Disclaimer

This performance check was conducted amidst the COVID-19 outbreak in 2020. Due to travel restrictions in 2020, the assessment methodology for this check was modified to adapt to an online version.

While the performance check does cover all indicators, Fair Wear was not able to cross-check information with the member company's other departments to the extent it would normally do. This may have led to shorter descriptions/comments in the report. We have taken additional measures to ensure the scores are still inclusive and representative of the performance/progress made: more documentation was requested from the member during the preparation phase and other staff members were interviewed to score a specific indicator, where necessary. Furthermore, due to our improved data management system, Fair Wear was able to better track and document progress, mitigating much of the disadvantage of a remote performance check.

This modified version was applied consistently to all members' performance checks starting their financial year in 2019 in order to maintain fair and comparable data.

Fair Wear will evaluate the members' response to the Corona-crisis in the performance check about the financial year starting in 2020. For members having financial years starting in April or later, parts of their response can already be reflected in the current performance check report, although their overall response will be evaluated in the next performance check.

Summary:

Biscana has shown insufficient progress on Fair Wear's performance indicators. It has monitored 83% of its purchasing volume and meets the monitoring threshold for second-year members. The benchmarking score of 4.1 just places Biscana in the 'Good' category. However, the repeated non-compliance on indicator 2.7 means that Biscana is placed in the category 'Needs Improvement'.

In 2019, Biscana worked with 11 suppliers, 7 in Bangladesh, 2 in China, 1 in Pakistan and 1 in Portugal. Biscana has a representative in Bangladesh, who regularly visits and monitors the main suppliers in this country. Nevertheless, Biscana was not able to demonstrate knowledge of the status of any CAP findings during this brand performance check. Biscana needs to develop a system to keep track of the progress on CAP follow-up.

Biscana has made some progress on the indicators on due diligence when selecting new suppliers and the evaluation of existing suppliers' compliance with the Fair Wear Code of Labour Practices. Biscana is encouraged to further strengthen and integrate these basic systems in its purchasing practices. Furthermore, Biscana must ensure that the Worker Information Sheet, including contact information of the local complaints handler of Fair Wear, is posted in factories in a location that is accessible to all workers. Fair Wear's Workplace Education Programme (WEP) basic module or implement training related to the Fair Wear CoLP and complaint hotline can assist the member in actively raising awareness about the Fair Wear CoLP and Fair Wear complaint hotline.

Finally, Biscana needs to develop a strategy in risk-management in high-risk areas. All suppliers located in Bangladesh should be under the Bangladesh Accord on Fire and Safety, as was required from Biscana in the previous brand performance check. The fact that Biscana has not remediated this requirement in 2019, is considered a repeated non-compliance, which automatically places Biscana in the Needs Improvement category. It is crucial that Biscana remediate this requirement within 2020, in order to avoid suspension.

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 Fair Wear's belief that member companies who are making a serious effort to implement the Code of Labour Practices—the vast majority of Fair Wear 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.	70%	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: In 2019, Biscana bought 70% of its production volume from production locations where it buys at least 10% of production capacity. This is an increase compared to 58% in 2018.

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.	5%	Fair Wear 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 Fair Wear.	3	4	0

Comment: In 2019, 5% of the production volume came from production locations where Biscana buys less than 2% of its total FOB. This is a slight increase compared to 3% in 2018. These suppliers make specific products which cannot be placed at Biscana's core suppliers. Biscana wants to increase leverage at these suppliers, rather than ending any business relationships.

Recommendation: Fair Wear recommends Biscana to limit the number of production locations in its 'tail end'. To achieve this, Biscana should determine whether production locations where they buy less than 2% of their FOB are of strategic relevance. Shortening the tail will reduce the social compliance risks the member is exposed to and will allow the member to improve working conditions in a more efficient and effective way. It is advised to describe the process of consolidation in a sourcing strategy that is agreed upon with top management/sourcing staff.

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.	70%	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: In 2019, 70% of Biscana's production volume came from production locations where a business relationship has existed for at least five years. This percentage includes two of their main suppliers, with which they have been working since the inception of the brand. Biscana does not have any concrete policy to maintain stable relationships with suppliers. As Biscana grows, there is a need to expand the supplier list, but according to the company the intention is to create long-term relationships with all suppliers.

Recommendation: Especially for a growing company, it is advised to describe policies regarding maintaining long term business relationships in a sourcing strategy that is agreed upon with top management/sourcing staff. This may not seem necessary yet, but as Biscana is growing, it will become increasingly relevant to have a strong foundation upon which to build. Long term relationships support most aspects of the Code of Labour Practices and give factories a reason to invest in improving working conditions.

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	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.	0	2	0

Comment: Following the requirement in the previous brand performance check, Biscana has invested in receiving the signed questionnaire from its suppliers. Biscana received the questionnaire from all suppliers except one. This is Biscana's oldest supplier, which is based in Portugal. Biscana explained that they find it difficult to get this supplier to sign the questionnaire because they have been doing business for a long time and the supplier does not understand why they suddenly have to sign this.

Requirement: While Fair Wear understands a long-standing personal relationship can be delicate, Fair Wear finds it problematic that after two years of membership, Biscana has still not been able to solve this. Biscana can ask Fair Wear for support on how to deal with this. Biscana needs to ensure that all production locations, including existing ones, sign and return the questionnaire before first orders are placed.

Recommendation: It is advised to use the outcome of the questionnaires to update the production location data, for instance on leverage and subcontractor information. Moreover, Biscana is also encouraged to follow up with suppliers in case they do not endorse the Code of Labour Practices or show resistance in some of the replies.

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.	Intermediate	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.	2	4	0

Comment: Biscana uses a basic supplier assessment checklist to review in-house facilities and general quality requirements for their garments. This assessment includes a section to check existing audits or certifications. Every supplier is visited before orders are placed to check facilities, technical capability, capacity, certifications, and review of other existing brands sourcing there. In 2019, Biscana added 4 suppliers to the supplier base. The supplier assessment check-list and the assessment was used during visits at these suppliers and according to Biscana this assessment is taken into consideration when selecting factories. However, Biscana does not have a system in place to analyse the country-specific risks which can impact their supply chain.

Recommendation: A risk analysis as part of the decision-making process of selecting new production locations is an important step to mitigate risk and prevent potential problems. Fair Wear recommends Biscana to clearly define preventive actions for identified risks and connect them to sourcing decisions. This also includes strategies to tackle structural risks such as low wage levels in the country, limited freedom of association and restricted civil society that are beyond the brand's individual sphere of influence.

Fair Wear advises to use information from Fair Wear country studies and wage ladders and use the Fair Wear Health and Safety guidelines. Biscana can use the CSR Risk Check (<https://www.mvorisicochecker.nl/en/risk-check>) to further assess the risks in (potential new) sourcing countries. This is especially relevant as Biscana is growing and is expanding its production to more and more countries. For gender risk assessments, Biscana can use the gender-toolkit that has fact-sheets per country, supplier checklists and a model policy on Sexual Harassment. Biscana can cooperate with local stakeholders to further investigate the situation in specific countries. Fair Wear can offer information on local stakeholders.

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: In 2019, Biscana has started structurally evaluating production location compliance with the Code of Labour Practices in the production locations in Bangladesh, where the majority of FOB is sourced. The other countries are not yet systematically evaluated. When suppliers perform well, they are rewarded with extra orders. However, Biscana does not have a system in place to keep track of the evaluation of these and other suppliers.

Recommendation: Fair Wear recognises Biscana's approach to supplier evaluation in 2019 is an improvement compared to 2018, but still strongly encourages Biscana to develop an evaluation/grading system for suppliers where compliance with labour standards is a criterion for future order placement. Part of the system can be to create an incentive for rewarding suppliers for realised improvements in working conditions. Such a system can show whether and what information is missing per supplier and can include outcomes of audits, trainings and/or complaints.

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: Biscana keeps track of stock in an excel system which is also used as forecasting system. Through this system, Biscana is able to estimate when stock will be low and can place orders for these items well ahead of time. The purchasing department uses a lead time of 6 months for all its orders as a rule. Festivals, such as Ramadan or Eid, when in Bangladesh and Pakistan less work can be done, are taken into account. Biscana's main supplier in Bangladesh sends Biscana an overview of their capacity at the beginning of the year, so Biscana can plan according to that. Biscana tries to also make use of the low seasons where possible when planning the orders. When delays occur, Biscana simply accepts that.

Recommendation: This system is an improvement compared to 2018, but Biscana is encouraged to keep developing this system and to collaborate with the suppliers in finding ways to avoid the occurrence of overtime, not only in Bangladesh but also in China where excessive overtime is a common risk.

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: Biscana believes overtime is a result of mistakes made by the sewers during production. These mistakes then need to be rectified, which causes overtime. Biscana discussed this with factory management and went to the factory to explain how the mistakes had to be corrected. In comparison to the previous brand performance check, when Biscana thought overtime was only caused by other customers, Biscana has taken more responsibility for its own role in the occurrence of overtime in 2019. However, Biscana has not done a thorough root cause analysis.

Recommendation: While it is positive that Biscana has made some improvement compared to the previous year, Fair Wear still considers these efforts quite superficial. Besides discussing the topic with the supplier and assessing root causes, Fair Wear strongly recommends Biscana to actively take action when excessive overtime is found. Taking measures to ensure that Biscana knows and shows whether excessive overtime takes place at a supplier is key in resolving the issue. Fair Wear recommends Biscana to use the Fair Wear guidance on excessive overtime, share that with the supplier and discuss which root causes and solutions may apply. Biscana could hire local experts to analyse root causes of excessive overtime in cooperation with the supplier. Fair Wear could recommend qualified persons upon request. Fair Wear recommends cooperating with other customers in the same 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 can demonstrate the link between its buying prices and wage levels in production locations.	Intermediate	Understanding the labour component of buying prices is an essential first step for member companies towards ensuring the payment of minimum wages – and towards the implementation of living wages.	Interviews with production staff, documents related to member's pricing policy and system, buying contracts.	2	4	0

Comment: Biscana uses a costing system for its products in which different components of the price are specified. The labour cost is considered part of what is called the 'margin' in this open costing sheet. Biscana expects the factory to get its overhead, labour costs and profit margin from this component. The division between these costs is not specified. Biscana did discuss what the percentage of overhead is with its main supplier but does not have sufficient information regarding the labour cost to be able to use this in price negotiations. Biscana is not aware of the amount of sewing minutes that go into its products. The company negotiates prices in good faith and believes this brings them to a fair price. When legal minimum wage was raised in Bangladesh, Biscana raised its prices in this country as well.

Recommendation: Biscana has some basic insight in the cost breakdown of its products. Fair Wear recommends Biscana to expand their knowledge of cost break downs of all product groups. A next step would be to calculate the labour minute costs of its products to be able to calculate the exact costs of labour and link this to their own buying prices. First priority would be to make sure this level of transparency can be achieved with their suppliers.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.9 Member company actively responds if production locations fail to pay legal minimum wages and/or fail to provide wage data to verify minimum wage is paid.	No problems reported/no audits	If a supplier fails to pay minimum wage or minimum wage payments cannot be verified, Fair Wear member companies are expected to hold management of the supplier accountable for respecting local labour law. Payment below minimum wage must be remediated urgently.	Complaint reports, CAPs, additional emails, Fair Wear Audit Reports or additional monitoring visits by a Fair Wear auditor, or other documents that show minimum wage issue is reported/resolved.	N/A	0	-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 and responds to root causes for wages that are lower than living wages in production locations.	Insufficient	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach	Evidence of how payment below living wage was addressed, such as: Internal policy and strategy documents, reports, correspondence with factories, etc	0	6	0

Comment: Biscana has not yet analysed the root causes for wages that are lower than living wages in production locations. Based on its costing sheet, Biscana believes the prices paid at the main production location in Bangladesh are sufficient to pay for Biscana's share of a living wage, but it is not clear how the money is distributed. According to the Fair Wear audit done at this location, wages here are below the living wage.

Requirement: Biscana must assess the root causes of wages that are lower than living wages, taking into account its leverage and effect of its own pricing policy. Biscana is expected to take an active role in discussing living wages with its suppliers. The Fair Wear wage ladder can be used as a tool to implement living wages, to document, monitor, negotiate and evaluate the improvements at its suppliers.

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.13 Member company determines and finances wage increases.	None	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach.	Evidence of how payment below living wage was addressed, such as: internal policy and strategy documents, reports, correspondence with factories, etc.	0	6	0

Comment: Biscana did not determine wage increases at suppliers yet, and did not set a target wage at any of its suppliers. Biscana plans to pay for any wage increases by balancing the costs with more technical, and thus more expensive, products.

Requirement: Biscana should analyse what is needed to increase wages and develop a strategy to finance the costs of wage increases.

Recommendation: It is recommended that Biscana refers to Fair Wear's Living Wage Approach, available on the Member Hub, to get started on this topic.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.14 Percentage of production volume where the member company pays its share of the target wage.	0%	Fair Wear member companies are challenged to adopt approaches that absorb the extra costs of increasing wages.	Member company's own documentation, evidence of target wage implementation, such as wage reports, factory documentation, communication with factories, etc.	0	6	0

Comment: Although it was required in last year's brand performance check, Biscana has not set a target wage for its suppliers.

Requirement: Biscana is expected to begin setting a target wage for its production locations.

Recommendation: Fair Wear recognizes the topic of living wage is challenging to grasp in the first years of membership, but strongly encourages Biscana to start working on it in 2020 and not leave this topic for another year.

Purchasing Practices

Possible Points: 52

Earned Points: 21

2. Monitoring and Remediation

Basic measurements	Result	Comments
% of production volume where approved member own audit(s) took place.	0%	
% of production volume where approved external audits took place.	14%	
% of production volume where Fair Wear audits took place.	69%	
% of production volume where an audit took place.	83%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.	1%	To be counted towards the monitoring threshold, FWF low-risk policy should be implemented. See indicator 2.9. (N/A = no production in low risk countries.)
Member meets monitoring requirements for tail-end production locations.	First or second year member and tail-end monitoring requirements do not apply	1st or 2nd year member and tail-end monitoring requirements do not apply.
Total monitoring threshold:	84%	Measured as percentage of production volume (Minimums: 1 year: 40%; 2 years 60%; 3 years+: 80-100%)

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 Fair Wear 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: Biscana has a team of three people who together are responsible for following up on problems identified by the monitoring system.

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 Fair Wear teams cannot be used, the member companies' own auditing system must ensure sufficient quality in order for Fair Wear 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: Fair Wear 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: Biscana discussed the follow up of the Corrective Action Plan (CAP) findings with the supplier and agreed upon improvement timelines. Biscana follows the improvement timeline which is suggested by the auditors in the CAP. The merchandise manager in the factory shared the information from the audit with the workers.

Recommendation: Before an audit takes place, Biscana is recommended to check with the supplier whether worker representatives are active. In this way, they can be involved from the start of an audit and be invited for the audit opening and exit meeting. Including workers when following up on audit reports gives them the opportunity to be informed of issues in the factory and have a voice in the prioritization of issues.

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.	Insufficient	Fair Wear 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.	-2	8	-2

Comment: Biscana does not have any system in place to keep track of the progress on CAPs at this moment. Biscana has one employee who spends the majority of the year in Bangladesh and who is in constant contact with the factories there. This person regularly visits the factories and immediately discusses non-compliances with the factory management. Biscana did a Fair Wear audit at its main supplier and shared the CAP with this supplier but did not actively follow up on what the factory did in terms of remediation. Biscana was not able to show the status of any of the CAP findings during the brand performance check, which is remarkable given the fact that the company has a staff member almost full-time present in Bangladesh. Biscana is planning to improve this system and keep overviews of the CAP status at this and also other suppliers in the future.

Requirement: Resolving and remediating non-compliances is one of the most important criteria member companies can do towards improving working conditions. Fair Wear expects Biscana to examine and support remediation of any problem that they encounter. Coordinated efforts between different departments are required to ensure sustained responses to CAPs.

Recommendation: The feedback and supportive evidence that is sent by suppliers can be complex and difficult to interpret when unfamiliar with the local laws and expertise. Biscana can use Fair Wear's local team to verify the supportive evidence in case that is desirable.

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.	97%	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: Biscana has a representative in Bangladesh for a large part of the year who regularly visits the suppliers. Biscana was not able to visit the suppliers in China, which only account for a small percentage of the total FOB.

Recommendation: Fair Wear recommends to document the outcome of visits and ensure checking whether the CoLP is posted is part of every visit. Reporting back to the whole team on the discussions and follow up of CAPs with the supplier will help towards setting up an integrated system for improving working conditions. Fair Wear has developed a Health & Safety Guide that can be used during these visits.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.6 Existing audit reports from other sources are collected.	Yes	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.	1	3	0

Comment: In 2019, Biscana collected audit reports from other sources, but did not follow up on any of the CAP findings. Biscana does not have any system in place to assess the quality of these audits.

Recommendation: Fair Wear recommends Biscana to assess the quality of the external audit report using the Fair Wear Audit Quality Assessment Tool, and immediately discuss with the supplier how they can have a role in follow-up of the CAP findings.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.7 Compliance with FWF risk policies.	Average insufficient result on relevant policies	Aside from regular monitoring and remediation requirements under Fair Wear membership, countries, specific areas within countries or specific product groups may pose specific risks that require additional steps to address and remediate those risks. Fair Wear requires member companies to be aware of those risks and implement policy requirements as prescribed by Fair Wear.	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.	-2	6	-2
Compliance with FWF enhanced monitoring programme Bangladesh	Insufficient			-2	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
Other risks specific to the member's supply chain are addressed by its monitoring system	Insufficient			-2	6	-2

Comment: Compared to the previous brand performance check, Biscana has not made any progress on this indicator. Biscana did not become a member of the Bangladesh Accord in 2019, nor did its main supplier in Bangladesh, which accounts for 69% of the total FOB, sign the Accord.

Biscana is aware of the building health and safety issues, child labour and subcontracting as risks in Bangladesh. It has agreed with its suppliers not to subcontract as part of their terms and conditions for working with suppliers. Biscana has a staff member who regularly visits the production sites and uses a check-list which includes health & safety points to assess the situation in the factories. 96% of Biscana's production takes place in Bangladesh, however Biscana has not undertaken any further action to evaluate the risk of gender-based violence at their suppliers in Bangladesh as was required in last year's performance check.

The remaining 4% of Biscana's production takes place in China and Pakistan. In 2019, Biscana did not further investigate the risks in these countries compared to 2018, when the company indicated being aware of the risk of overtime in China.

Requirement: FWF requires all member companies to ensure inspections and remediation on fire and building safety are conducted at all suppliers. The Accord and the Alliance do quality assessments and follow up for brands after building and fire safety inspections. According to the ILO, Bureau Veritas and SGS are among credible organisations doing such inspections. Biscana should make sure all factories are inspected and start to work on remediation plans.

FWF requires all member companies to evaluate the risk of gender-based violence at their suppliers in Bangladesh. It is important that Biscana takes action to identify risk and prevent gender-based violence.

Biscana can broaden this knowledge by participating in country-specific training and/or webinars. Furthermore, Biscana can encourage suppliers to also participate in webinars on high-risk issues in order to gain more guidance on how to mitigate risks and on additional measures to integrate into their monitoring systems.

Recommendation: Biscana can broaden its country-specific knowledge by participating in country-specific training and/or webinars. Furthermore, Biscana can encourage suppliers to also participate in webinars on high-risk issues in order to gain more guidance on how to mitigate risks and on additional measures to integrate into their monitoring systems. Biscana should make sure that suppliers have sufficient knowledge and a functional system to promote gender equality and prevent gender based violence. A functional system to prevent violence needs involvement of both factory management and workers representatives. Fair Wear has extensive experience on supporting both employees and employers in setting up functional Anti-Harassment Committees. Fair Wear could provide training and regular support to suppliers upon request.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.8 Member company cooperates with other FWF member companies in resolving corrective actions at shared suppliers.	No cooperation	Cooperation between customers increases leverage and chances of successful outcomes. Cooperation also reduces the chances of a factory having to conduct multiple Corrective Action Plans about the same issue with multiple customers.	Shared CAPs, evidence of cooperation with other customers.	-1	2	-1

Comment: Biscana found out at the end of 2019 there is another Fair Wear member in one of its production facilities in Bangladesh. The company will look into cooperation for next year.

Requirement: Cooperation among Fair Wear members is required. In addition, it is advised to identify other clients and their commitment to improving working conditions. Involving more costumers of the factory increases leverage, the chances of successful outcomes and long term improvements.

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.	1.0%	Low-risk countries are determined by the presence and proper functioning of institutions which can guarantee compliance with national and international standards and laws. Fair Wear has defined minimum monitoring requirements for production locations in low-risk countries.	Documentation of visits, notification of suppliers of Fair Wear membership; posting of worker information sheets, completed questionnaires.	1	2	0

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
Member undertakes additional activities to monitor suppliers.	Yes			1	1	0

Comment: Biscana has a small percentage of production at one facility in Portugal, which is visited yearly.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.10 Extra bonus indicator: in case FWF member company conducts full audits at tail-end production locations (when the minimum required monitoring threshold is met).	No	Fair Wear encourages its members to 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 Fair Wear and recent Audit Reports.	N/A	2	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.	Yes, and member has collected necessary information	Fair Wear believes it is important for affiliates that have a retail/wholesale arm to at least know if the brands they resell are members of Fair Wear or a similar organisation, and in which countries those brands produce goods.	Questionnaires are on file.	2	2	0

Comment: Biscana has collected the questionnaire back from the external brand they are re-selling.

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).	100%	Fair Wear 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 Fair Wear's information management system. Documentation of sales volumes of products made by Fair Wear or FLA members.	3	3	0

Comment: Biscana resells items from one external brand, which is also a Fair Wear member.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.13 Questionnaire is sent and information is collected from licensees.	No licensees	Fair Wear 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

Monitoring and Remediation

Possible Points: 35

Earned Points: 11

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 Fair Wear 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: Biscana has a staff member on the production team who is responsible for addressing any worker complaints that may arise.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.2 Member company has informed factory management and workers about the FWF CoLP and complaints hotline.	No	Informing both management and workers about the Fair Wear Code of Labour Practices and complaints hotline is a first step in alerting workers to their rights. The Worker Information Sheet is a tool to do this and should be visibly posted at all production locations.	Photos by company staff, audit reports, checklists from production location visits, etc.	-2	2	-2

Comment: Compared to the previous year, Biscana has made progress on this indicator as the company could show proof that the Worker Information Sheet (WIS) is posted at most production locations, including those newly added in 2019. However, Biscana is still not able to ensure this for all production locations and some pictures were not representative, for example a close-up of the WIS on a wall which is not identifiable as visible to the workers.

Requirement: Biscana must ensure that the Worker Information Sheet, including contact information of the local complaints handler of Fair Wear, is posted in factories in a location that is accessible to all workers. Biscana should check by means of a visit whether the Worker Information Sheet is posted in the factories.

Recommendation: Biscana regularly visits its production locations. It is therefore recommended to take pictures while visiting the facilities, thus avoiding later struggles when trying to collect evidence that the WIS is posted.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.3 Degree to which member company has actively raised awareness of the FWF CoLP and complaints hotline.	14%	After informing workers and management of the Fair Wear CoLP and the complaints hotline, additional awareness raising and training is needed to ensure sustainable improvements and structural worker-management dialogue.	Training reports, Fair Wear's data on factories enrolled in the WEP basic module. For alternative training activities: curriculum, training content, participation and outcomes.	4	6	0

Comment: Biscana has not initiated FWF's Workplace Education Programme (WEP) at any of their suppliers.

Requirement: Fair Wear requires members to actively raise awareness about the Fair Wear Code of Labour Practices and Fair Wear complaint hotline. Biscana should ensure good quality systematic training of workers and management on these topics. To this end members can either use Fair Wear's Workplace Education Programme (WEP) basic module, or implement training related to the Fair Wear CoLP and complaint hotline through service providers or brand staff. Fair Wear's guidance on training quality standards is available on the Member Hub.

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 Fair Wear 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

Complaints Handling

Possible Points: 9

Earned Points: 3

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 Fair Wear membership requirements helps to support cross-departmental collaboration when needed.	Emails, trainings, presentation, newsletters, etc.	1	1	0

Comment: Information and news on FWF membership are shared with all staff on a regular basis via e-mail. Additionally, new staff members take part in a training on textile production, including certifications and memberships.

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 Fair Wear requirements and advocate for change within their organisations.	Fair Wear Seminars or equivalent trainings provided; presentations, curricula, etc.	2	2	-1

Comment: Biscana is a relatively small team, where QC and compliance fall under the production team, with one lead, who all sit together. All other staff members in direct contact with suppliers are informed of FWF requirements via e-mail and during meetings.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices.	Yes	Agents have the potential to either support or disrupt CoLP implementation. It is the responsibility of member company to ensure agents actively support the implementation of the CoLP.	Correspondence with agents, trainings for agents, Fair Wear audit findings.	1	2	0

Comment: Biscana started using agents in 2019 in Bangladesh. The agents are involved in making sure the factories meet Fair Wear requirements such as signing the Code of Labour Practices.

Recommendation: Fair Wear recommends the member to actively train their sourcing contractors/agents on monitoring and remediating gender-related problems and enable them to support the implementation of the CoLP.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.4 Factory participation in training programmes that support transformative processes related to human rights.	0%	Complex human rights issues such as freedom of association or gender-based violence require more in-depth trainings that support factory-level transformative processes. Fair Wear has developed several modules, however, other (member-led) programmes may also count.	Training reports, Fair Wear's data on factories enrolled in training programmes. For alternative training activities: curriculum, training content, participation and outcomes.	0	6	0

Comment: Biscana has not initiated any FWF's Workplace Education Programme (WEP) at any of its suppliers.

Recommendation: Fair Wear recommends Biscana to implement training programmes that support factory-level transformation such as establishing functional internal grievance mechanisms, improving worker-management dialogue and communication skills or addressing gender-based violence. Training assessed under this indicator should go beyond raising awareness and focus on behavioural and structural change to improve working conditions. To this end, Biscana can make use of Fair Wear's WEP Communication or Violence and Harassment Prevention modules or implement advanced training through external training providers or brand staff. Non-Fair Wear training must follow the standards outlined in Fair Wear's guidance and checklist available on the Member Hub.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.5 Degree to which member company follows up after a training programme.	No training programmes have been conducted or member produces solely in low-risk countries	After factory-level training programmes, complementary activities such as remediation and changes on brand level will achieve a lasting impact.	Documentation of discussions with factory management and worker representatives, minutes of regular worker-management dialogue meetings or anti-harassment committees.	N/A	2	0

Training and Capacity Building

Possible Points: 11

Earned Points: 4

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: As part of their terms and conditions for working with suppliers, suppliers are required to produce all products in-house and inform and get approval from Biscana if they use subcontractors. Biscana does not have any system in place to check whether products are indeed produced in-house. Biscana checks the occurrence of sub-contracting on a regular but non-systematic fashion by regularly visiting the factories and being in dialogue with the factories. This includes factories selected via the agent in Bangladesh.

Recommendation: Fair Wear recommends Biscana to integrate systematic periodical checks with its agents whether all known production locations are still up to date and use the information coming from questionnaires to update supplier data, including subcontractors.

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: Biscana's team is fairly small and they share information on conditions at production locations regularly, via meetings and shared emails. After a factory visit, the staff is informed about the factory visit including any issues working conditions issues.

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	Fair Wear's communications policy exists to ensure transparency for consumers and stakeholders, and to ensure that member communications about Fair Wear are accurate. Members will be held accountable for their own communications as well as the communications behaviour of 3rd-party retailers, resellers and customers.	Fair Wear membership is communicated on member's website; other communications in line with Fair Wear communications policy.	2	2	-3

Comment: Biscana communicates about FWF's membership on its website, catalog, and banner.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.2 Member company engages in advanced reporting activities.	Published Brand Performance Checks, audit reports, and/or other efforts lead to increased transparency.	Good reporting by members helps to ensure the transparency of Fair Wear'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: Biscana published the 2018 Brand Performance Check on its website. Biscana does not publish audit reports or other supplier data.

Recommendation: FWF recommends the member to gradually work towards increased transparency by also publishing more of the following on its website: audit reports, supplier information. Good reporting by members helps to ensure the transparency of the member and Fair Wear's work.

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 submitted to FWF AND 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 Fair Wear's communication policy.	Social report that is in line with Fair Wear's communication policy.	2	2	-1

Comment: Biscana completed its social report and published the report on its website.

Transparency

Possible Points: 6

Earned Points: 5

7. Evaluation

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
7.1 Systemic annual evaluation of FWF membership is conducted with involvement of top management.	Yes	An annual evaluation involving top management ensures that Fair Wear policies are integrated into the structure of the company.	Meeting minutes, verbal reporting, Powerpoints, etc.	2	2	0

Comment: Biscana discusses and evaluates FWF membership throughout the year during meetings between management and QC and compliance manager.

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.	40%	In each Brand Performance Check report, Fair Wear may include requirements for changes to management practices. Progress on achieving these requirements is an important part of Fair Wear membership and its process approach.	Member company should show documentation related to the specific requirements made in the previous Brand Performance Check.	2	4	-2

Comment: Biscana made limited progress on the many requirements it received in the previous brand performance check. Especially the lack of progress on indicator 2.7 is considered a severe problem by Fair Wear. This repeated non-compliance causes Biscana to end up in the category "Needs Improvement" regardless of efforts on other indicators.

- 1.3: Biscana needs to ensure that new suppliers sign and return the questionnaire before first orders are placed. -> Full progress was made in 2019.
- 1.5: Biscana should develop a systematic approach to evaluate suppliers consistently -> Some progress made in 2019, more steps are needed to fully count towards this indicator.
- 1.6: Biscana should ensure its production planning systems support reasonable working hours. -> Some progress was made in 2019, but more steps are needed to fully count towards this indicator.
- 1.7: Biscana should do a root-cause analysis to investigate to what extent its current buying practices has an effect on the working hours at the supplier level. -> Some progress was made in 2019, but more steps are needed to fully count towards this indicator.
- 1.8 Biscana should be able to demonstrate the link between its buying prices and wage levels in production locations. -> Some progress was made in 2019, but more steps are needed to fully count towards this indicator.
- 1.11 Biscana should assess and respond to root causes for wages that are lower than living wages in production locations. -> No progress was made in 2019.
- 1.13: Biscana should analyse what is needed to increase wages and develop a strategy to finance the costs of wage increases. -> No progress was made in 2019.
- 1.14: Biscana should begin setting a target wage for its production locations. -> no progress was made in 2019.
- 2.7: Biscana should ensure all factories in Bangladesh are monitored under the Bangladesh Accord -> No progress was made in 2019.
- 2.11 Biscana should collect the signed questionnaire from external brands resold by the member company. -> Full progress was made on this indicator in 2019.
- 3.2: Biscana must ensure that the Worker Information Sheet is posted -> Insufficient progress was made in 2019.
- 3.3: Biscana should actively raise awareness of the Fair Wear CoLP and complaints helpline by e.g. carrying out a Fair Wear WEP basic training -> no progress was made in 2019.

Requirement: It is required to work towards remediation of previous requirements from the last Brand Performance Check. Further engagement needs to be taken with regard to the following requirements mentioned in the last Brand Performance Check.

Recommendation: It is crucial that Biscana remediate this requirement within 2020, in order to avoid suspension.

Evaluation

Possible Points: 6

Earned Points: 4

Recommendations to Fair Wear

Biscana went through some organisational changes in 2019 and the new responsible person for Fair Wear struggled to find out everything they needed to know. Biscana recommends Fair Wear to give more concrete warnings to guide newer brands in their membership, for example when documents are due or webinars are taking place, and more step-by-step guidance. Biscana found it difficult to decide what to focus on, also because its brand liaison left Fair Wear and was replaced fully only after a few months. However, Biscana is very happy with its new brand liaison. Furthermore, Biscana finds it is difficult to find information on the Fair Wear website and the Member Hub, because you need to input very concrete search terms. Biscana recommends Fair Wear to make this search easier.

Scoring Overview

Category	Earned	Possible
Purchasing Practices	21	52
Monitoring and Remediation	11	35
Complaints Handling	3	9
Training and Capacity Building	4	11
Information Management	4	7
Transparency	5	6
Evaluation	4	6
Totals:	52	126

Benchmarking Score (earned points divided by possible points)

41

Performance Benchmarking Category

Needs Improvement

Brand Performance Check details

Date of Brand Performance Check:

04-08-2020

Conducted by:

Paula de Beer

Interviews with:

Vanessa Rosario, Pedro Cunha, Nuno Silva