



## **Brand Performance Check**

### **Bamboo Clothing Ltd**

**Publication date: December 2022**

This report covers the evaluation period 01-02-2021 to 31-01-2022

## 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](http://www.fairwear.org). The online [Brand Performance Check Guide](#) provides more information about the indicators.

*This year's report covers the response of our members and the impact on their supply chain due to the COVID-19 pandemic which started in 2020. The COVID-19 pandemic limited the brands' ability to visit and audit factories. To ensure the monitoring of working conditions throughout the pandemic, Fair Wear and its member brands made use of additional monitoring tools, such as complaints reports, surveys, and the consultation of local stakeholders. These sources may not provide as detailed insights as audit reports. To assess outcomes at production location level, we have included all available types of evidence to provide an accurate overview of the brands' management systems and their efforts to improve working conditions. Nevertheless, brands should resume verifying working conditions through audits when the situation allows for.*

# Brand Performance Check Overview

## Bamboo Clothing Ltd

Evaluation Period: 01-02-2021 to 31-01-2022

Member company information	
Headquarters:	Plymouth , United Kingdom
Member since:	2021-04-01
Product types:	Activewear, Garments, Clothing, Fashion Apparel, Accessories, Outdoorwear
Production in countries where Fair Wear 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	25%
Benchmarking score	26
Category	Needs Improvement

## Summary:

Bamboo Clothing has shown insufficient progress on the performance check indicators, leading to a benchmark score of 26 points. As a result, Bamboo Clothing Ltd is placed in the 'Needs Improvement' category. Bamboo Clothing Ltd has monitored 25% of its supply chain.

## Corona Addendum:

Bamboo Clothing Ltd (Bamboo Clothing) is a company that produces activewear, mainly made from bamboo fabrics. The COVID-19 pandemic provided the company with many opportunities in the first year of lockdowns. Customers were finding their way to Bamboo Clothing's direct-to-consumer website, and sales increased. The second year of lockdowns was a bit slower, and the brand is trying to sustain its momentum by offering more products in its assortment. Bamboo Clothing has a strong sense of righteousness and aims to be a frontrunner in environmental and social sustainability.

In 2021, Bamboo Clothing did not have a system describing all the necessary steps for proper Human Rights Due Diligence at its suppliers. There's an understanding in the team of what responsible purchasing practices should look like, but it is yet to be formalised in policy statements. Since one team member took parental leave for a large part of 2021, not all of Bamboo Clothing's social ambitions could be realised. The member brand could only uphold some CSR-related tasks or start working on its work plan that was created in collaboration with Fair Wear. Additionally, Bamboo Clothing does not have a process to systemically follow up on corrective action plan issues.

Unfortunately, the brand had to cancel, decrease and postpone some orders unilaterally due to COVID-19. The brand involved the Managing Director in addressing the changes in orders to its suppliers. At all times, suppliers were given transparent information about the current situation and were told what to expect from Bamboo Clothing in the future. The brand had contact with its supplier to ensure that the costs incurred were paid for. However, the loss of reserved capacity has not been investigated enough. During this period, the brand did not actively engage with suppliers about the order situation at the suppliers, layoffs, working hours, wages, and the health and safety of the workers.

As a result, Bamboo Clothing has shown insufficient progress on almost all performance indicators and, with a benchmarking score of 26, is placed in the 'Needs Improvement' category.

Fair Wear requires Bamboo Clothing to ensure enough capacity to monitor, remediate and mitigate potential risks at its suppliers as soon as possible. This includes a thorough risk assessment of all production countries and (potentially new) suppliers and linking the assessed risks to its suppliers. After prioritising the risks, Bamboo Clothing should set up a work plan to start the remediation and mitigation process in cooperation with its suppliers and worker representatives. Fair Wear strongly recommends beginning work on the Responsible Business Conduct policy.

## 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.	47%	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.	2	4	0

**Comment:** Bamboo Clothing has a small supplier base. Most of the products are sourced from Turkey and China. Bamboo Clothing buys 47% of its production volume from locations where it buys at least 10% of production capacity.

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.	1%	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 2021, 1% of the total production came from locations where Bamboo Clothing buys less than 2% of its total production volume.

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:** Bamboo Clothing has an informal strategy of working with suppliers for the long term due to the special quality requirements of its products. This has resulted in 70% of the total production volume being produced at production locations where a business relationship has existed for over five years.

**Recommendation:** Fair Wear recommends Bamboo Clothing to maintain stable business relationships with suppliers. Long term relationships support most aspects of the Code of Labour Practices, and give factories a reason to invest in improving working conditions. 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.

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.	2nd years + member and no new production locations selected	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

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.	Insufficient	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.	0	4	0

**Comment:** Bamboo Clothing's sourcing strategy is primarily based on building long-term relationships based on trust with a select number of suppliers. Bamboo Clothing has a small number of suppliers and only source from Turkey, China and Portugal. In 2021, the brand did not add a new production location to its supplier portfolio. Normally, the brand requests a valid audit from the factory before they start production. There is, however, no active follow-up after receiving the audit report. After receiving the audit report, the brand sends out its own impact questionnaire which is primarily focused on environmental topics. And ideally, Bamboo Clothing plans a visit before production starts. Due to COVID-19 and travel restrictions, the brand was not able to visit its suppliers. Bamboo Clothing did not have a system in place describing all the necessary steps to conduct adequate human rights due diligence (HRDD) nor has it made a risk scoping of prevalent risks in its sourcing countries. The brand has yet to conduct a risk assessment and consult available resources to identify risks in its supply chain.

In 2021, the brand unilaterally cancelled some of its orders at its sewing factories. The brand did not assess the impact it had on its suppliers.

After becoming a member in 2021, for the most part of 2021 and a part of 2022, there was no dedicated person to follow up on human rights due diligence.

**COVID-19:**

Throughout the year, Bamboo Clothing stayed in contact with its suppliers. Preventive health and safety measures were discussed but not verified.

**Requirement:** A formal process should exist to evaluate the risks of labour violations in the production areas Bamboo Clothing is operating. This evaluation should influence the decision on whether to place orders, how to prevent and mitigate risks, and what remediation steps may be necessary.

**Recommendation:** It is advised to describe the process of assessing working conditions at potential new suppliers in a sourcing strategy agreed upon with top management/sourcing staff. Bamboo Clothing can also include social themes in its impact questionnaire as part of the onboarding process. The brand is also strongly recommended to develop a strategy to keep updated about country developments and how that can impact the implementation of the Code of Labour Practices at suppliers.

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.	No	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.	0	2	0

**Comment:** Bamboo Clothing values its relationship with suppliers and evaluates supplier performance formally by making SWOT analyses. The evaluation is based on product quality, costs, delivery and performance. In 2021, the Code of Labour Practices (CoLP) compliance was not part of the evaluation.

In 2021, Bamboo Clothing cancelled, postponed and reduced several orders at its sewing facilities because of COVID-19. The brand did discuss the change of orders with its factories but has not evaluated the impact it had on the suppliers enough.

**Recommendation:** Fair Wear encourages Bamboo Clothing 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.	General or ad-hoc system.	Member company production planning systems can have a significant impact on the levels of excessive overtime at production locations.	Documentation of robust planning systems.	2	4	0

**Comment:** Bamboo Clothing works with one main drop per season, with a few more seasonal products launching later in the season at either high summer or winter. All products follow the same development cycle. The development cycle (design-started to orders-placed) is split into two critical paths, which run concurrently due to longer lead times manufactured in China. Design development starts one year before the launch, and key critical dates are agreed upon with suppliers at the beginning of each season. Working with two seasons generally means that there are peak times at suppliers. After COVID-19 lockdowns, Bamboo Clothing agreed with its suppliers that it is permitted to receive the goods in batches. Receiving goods in batches allows the suppliers to spread the work out over a more extended period to relieve suppliers from peak periods. In 2021, Bamboo Clothing was not working with standard labour minutes to calculate peak times at suppliers.

**Recommendation:** Fair Wear recommends Bamboo Clothing to learn more about the standard minute per style and how the production of its products impacts the total production capacity of the factory.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.7 Degree to which member company mitigates root causes of excessive overtime.	Insufficient 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.	0	6	0

**Comment:** Though the member has collected audit reports, it has yet to follow up on the findings. In 2021, Bamboo Clothing was unaware of any cases of overtime. The brand did require suppliers to send valid audit reports but did not commission any audit reports. The member also did not follow up on existing corrective action plans/audit findings. The audit reports collected by the brand did show cases of excessive overtime. This was highly predictable because of local lockdowns in China. Because Bamboo Clothing did not have this information, the brand did not conduct a root cause analysis of possible delays caused by COVID-19 or otherwise.

**Requirement:** Bamboo Clothing should investigate to what extent its current buying practices have an effect on the working hours at supplier level.

**Recommendation:** Fair Wear recommends the member to keep itself informed about developments in its supply chain, and investigate how these can lead to excessive overtime for its suppliers. Bamboo Clothing could develop instruments or processes to deal with possible delays to avoid excessive overtime. Those instruments could include being flexible with delivery dates, prioritizing orders, offer support/flexibility for material delivery, ordering in low season, keeping stock etc. The outcomes of the root cause analysis can be used for identifying strategies that minimise the impact of its sourcing practice on working hours at other factories. The member is also strongly recommended to use the Fair Working Hours Guide for this.

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.	Insufficient	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.	0	4	0

**Comment:** The member brand's Head of Buying sets the prices by negotiating with the supplier. Prices are usually set based on the first samples, suggested retail prices, and prices of similar products. Bamboo Clothing always tries to get the best balance between price and quality and will negotiate with the supplier when they think the price is too high. In rare cases, the brand tries to push hard for better prices. When a price does not add up, the member brand will resort to an open cost sheet to understand why prices are higher than expected. In most cases, Bamboo Clothing will use cross-costing to understand suppliers' price differences better. The member brand has no information regarding wage levels in its production countries. Bamboo Clothing could not show the link between its buying prices and wage levels at its suppliers, and does not know whether its pricing covers the costs for payment of legal minimum wage.

**Requirement:** Bamboo Clothing needs to demonstrate an understanding of the link between buying prices and wage levels, to ensure their pricing allows for the payment of the legal minimum wage.

The member should engage in a dialogue with the supplier about the additional costs due to COVID-19, the effect on wages, etc. and take steps to incorporate these additional costs into their prices.

**Recommendation:** At a minimum, members are recommended to investigate wage levels in production countries, among others by making use of Fair Wear's Wage Ladder and country studies and keep itself informed about legal minimum wage increases. 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.

Fair Wear also highly recommends Bamboo Clothing to actively approach one or more suppliers to work with the available tools of the living wage toolkit by using for example the Fair Price app.

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	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.	-2	0	-2

**Comment:** In 2021, Bamboo Clothing was unaware of the failure to pay legal minimum wages and/or failure to provide wage data to verify minimum wage is paid because the brand did not look into or follow up on monitoring activities. However, at one factory, it showed that a factory repeatedly failed to pay out (social) insurance which is part of legal minimum wage requirements. Bamboo Clothing did not proactively reach out to suppliers to find out if there were any legal minimum wage issues due to COVID-19.

**Requirement:** During COVID-19 the member is expected to thoroughly check with its suppliers whether they foresee any issues with the payment of wages.

Please note that following Fair Wear's policy for repeated non-compliance in Fair Wear's Brand Performance Checks, members that receive an insufficient or -2 score on this indicator for the second year in a row, will be placed in the 'Needs Improvement' category.

**Recommendation:** Bamboo Clothing could help its suppliers by directing them to available local governmental support schemes that they may be eligible for. The member is also strongly encouraged to verify via audits or monitoring visits if workers received the legal minimum wage.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.10 Evidence of late payments to suppliers by member company.	Yes	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.	-1	0	-1

**Comment:** After the initial down payment, Bamboo Clothing pays the remaining order balance before orders are released. However, because of cancelled orders by the brand, the brand does not meet the requirement for this indicator. Following the communication from the brand to its supplier, the supplier was not compensated for any losses.

**Requirement:** Where members cancel orders, suppliers should be fully compensated for the costs made as is outlined in the in the joint MSI statement.

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:** In 2021, Bamboo Clothing did not collect information about wage levels in its production countries. Therefore, the brand could not determine whether wages at its production facilities were lower than living wages. The member company did not monitor if wages dropped during COVID-19.

**Recommendation:** Firstly, Bamboo Clothing should collect and assess information regarding wage levels at its production facilities. If the information shows that wages are lower than living wages, the member brand must assess the root causes of wages that are lower than living wages, taking into account its leverage and the effect of its own pricing policy. Bamboo Clothing Ltd 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 and 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:** Bamboo Clothing does not yet have a strategy in place to determine and finance wage increases.

**Recommendation:** In determining what is needed and how wages should be increased, it is recommended to involve worker representation.

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:** Bamboo Clothing did not pay its share of target wages, as no target wages were agreed upon in 2021.

**Recommendation:** Fair Wear recommends Bamboo Clothing to set a target wage for its production locations.

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## Purchasing Practices

**Possible Points: 50**

**Earned Points: 7**

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## 2. Monitoring and Remediation

Basic measurements	Result	Comments
% of production volume where an audit took place.	24%	
% 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.
Requirement(s) for next performance check	All factories must be visited by Bamboo Clothing staff at least once every three years. Bamboo Clothing should also check the quality of its audits. If audits are submitted to Fair Wear without the quality being checked, the audits will not count towards the monitoring requirements.	
Total monitoring threshold:	25%	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:** In 2021, the designated person to address worker complaints was on parental leave. Another colleague was available to follow up on problems identified by the monitoring system. Yet, did not follow up on problems identified by the monitoring system.

**Requirement:** Bamboo Clothing should designate a person with sufficient capacity and resources to follow 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

**Comment:** Bamboo Clothing makes use of Fair Wear audits and external audits only.

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.	No	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.	-1	2	-1

**Comment:** In 2021, Bamboo Clothing mainly requested audits from its suppliers but has not followed up on the audit findings or established a timeline with its suppliers to improve on the findings. The member brand did not inquire about active worker representation in its factories when assessing audit reports. At the end of 2021, the brand participated in a Fair Wear audit, but the audit report and corrective action plan were only sent in March 2022 and are therefore not included.

**Requirement:** Bamboo Clothing is required to share and discuss the audit report and CAP findings with the factory within 2 months. A reasonable time frame should be specified for resolving findings. In case worker representation is applicable, the CAP should be shared with worker representative as well as involved in setting the time-frame for realising improvements.

**Recommendation:** Before an audit takes place, Bamboo Clothing 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:** In 2021, Bamboo Clothing mainly requested audits from its suppliers. The brand did not follow up on existing corrective action plans and could not demonstrate the status of the CAP findings or if any progress was made.

At the end of 2021, the brand participated in a Fair Wear audit, but the audit report and corrective action plan were only sent in March 2022 and are therefore not included. Progress will therefore be assessed in the next performance check. The member brand did not inquire about active worker representation in its factories when assessing audit reports.

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

Please note that following Fair Wear's policy for repeated non-compliance in Fair Wear's Brand Performance Checks, members that receive an insufficient or -2 score on this indicator for the second year in a row, will be placed in the 'Needs Improvement' category.

**Recommendation:** The member should take steps to remediate CAP findings and regularly check in with suppliers on the status and developments.

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.	not applicable	Due to the Covid-19 pandemic, brands could often not visit their suppliers from March - December 2020. For consistency purposes, we therefore decided to score all our member brands N/A on visiting suppliers over the year 2020.	Member companies should document all production location visits with at least the date and name of the visitor.	N/A	4	0

**Comment:** As travel was restricted due to the COVID-19 pandemic, this indicator is not applicable in 2021.

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:** Bamboo Clothing collects audit reports from other sources, mainly by requesting them directly from the supplier. In 2021, Bamboo Clothing did not assess the quality of the audit reports nor implemented corrective actions.

**Recommendation:** Existing reports form a basis for understanding the issues and strengths of a supplier, and reduces double work. Existing audits can be counted towards the monitoring threshold if the quality of the report is assessed using the Fair Wear audit quality tool and corrective actions are implemented.

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	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	Insufficient			-2	6	-2
Other risks specific to the member's supply chain are addressed by its monitoring system	Insufficient			-2	6	-2

**Comment:** In 2021, Bamboo Clothing has not paid attention to specific country risks of its sourcing countries China and Turkey. The brand seems to be aware of some of the risks in these countries but has not documented them.

#### COVID-19:

The brand did not send out a COVID-19 questionnaire to its supplier to learn more about the order situation of the suppliers, possible layoffs, working hours, wages and the health and safety of the workers. Bamboo Clothing does not know the costs for suppliers to implement COVID-19 preventive measures. The brand did send out regular updates about its own changing situation to inform the suppliers.

**Requirement:** Bamboo Clothing monitoring system should identify and address high-risk issues that are specific to the member's sourcing practices. Fair Wear provides policies and country-specific requirements to member companies. Priorities in remediation efforts are guided by these policies.

The member must verify what occupational health and safety (OHS) measure its suppliers took in response to COVID-19.

Please note that following Fair Wear's policy for repeated non-compliance in Fair Wear's Brand Performance Checks, members that receive an insufficient or -2 score on this indicator for the second year in a row, will be placed in the 'Needs Improvement' category.

**Recommendation:** Knowing the country-specific risks facilitates the starting point for discussing this with suppliers. Member companies can agree on additional commitments that are required to mitigate risks. Bamboo Clothing Ltd can provide additional measures for support and integrate that into the monitoring system.

Fair Wear recommends Bamboo Clothing Ltd to audit CMT subcontractors in Turkey.

Fair Wear advises Bamboo Clothing Ltd to create a policy to identify and remediate forced labour in its supply chain.

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

**Comment:** At the end of 2021, the brand participated in a Fair Wear audit, but the audit report and corrective action plan were only sent in March 2022 and are therefore not included.

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.	11%	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

**Member undertakes additional activities to monitor suppliers.:** No (o)

**Comment:** Bamboo Clothing has two suppliers in Portugal. The brand could show the returned questionnaire and the Worker Information Sheet posting. The brand, however, did not visit the brand in 2021. It is unclear how the brand stays updated about the labour conditions at the facilities.

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.	No external brands resold	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.	N/A	2	0

**Comment:** In 2021, no external brands were resold by Bamboo Clothing.

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	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.	N/A	3	0

**Comment:** In 2021, no external brands were resold by Bamboo Clothing.

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

**Comment:** In 2021, Bamboo Clothing had no licensees.

## Monitoring and Remediation

**Possible Points: 24**

**Earned Points: -1**

### 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:** In 2021, the designated person to address worker complaints was on parental leave. Another colleague was available to address worker complaints. However, in 2021, no complaints were filed.

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.	Yes	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:** Fair Wear sampled two factories during the brand performance check. Bamboo Clothing could show pictures of the workers' information sheets posted at all sampled factories.

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.	All production in low-risk countries/training not possible	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.	N/A	6	0

**Comment:** Because of travel restrictions in 2021 that limited the possibility of conducting training, this indicator is not applicable in 2021.

**Recommendation:** Fair Wear requires members to actively raise awareness about the Fair Wear Code of Labour Practices and Fair Wear complaint hotline. Bamboo Clothing 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

**Comment:** Bamboo Clothing did not receive any complaints in 2021.

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

Comment: Bamboo Clothing did not receive any complaints in 2021.

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## Complaints Handling

**Possible Points: 3**

**Earned Points: 3**

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

**Comment:** Bamboo Clothing informs members of staff about Fair Wear membership with a presentation. New members of staff will also take part in this presentation. In 2021, the Sustainability and Technical Manager organised several workshops and Q&A sessions where Fair Wear membership was discussed.

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:** Staff in direct contact with suppliers are informed about Fair Wear requirements by emails, meetings, and documents on the shared server. As the team is relatively small, the exchange of information happens in an informal way on an ad-hoc basis.

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:** Bamboo Clothing works with one agent in China. The agent is involved when it comes to requesting audits from the supplier. However, in 2021, the brand did not update its agent on Fair Wear-related topics, such as Fair Wear's COVID-19 dossier. Also, Bamboo Clothing does not investigate if the price negotiations done by the agent cover legal minimum wages.

**Recommendation:** If Bamboo Clothing delegates CAP follow-up and monitoring to agents, it should inform them about the Fair Wear COVID-19 guidance and ensure agents are enabled to monitor the impact of COVID-19 on suppliers.

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.	All production in low-risk countries/training not possible	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.	N/A	6	0

**Comment:** Because of travel restrictions in 2021 that limited the possibility of conducting training, this indicator is not applicable in 2021.

**Recommendation:** Fair Wear recommends Bamboo Clothing 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, Bamboo Clothing Ltd 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

Comment: No training was conducted in 2021.

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## **Training and Capacity Building**

**Possible Points: 5**

**Earned Points: 4**

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## 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:** The brand has worked with several suppliers of its relatively small supplier base for more than five years and considers its relationship with suppliers one built on trust. Bamboo Clothing does not have a contract or purchasing agreement with its suppliers where it states that subcontracting is prohibited. Generally, before travel restrictions, the brand would visit the factories to ensure no subcontracting takes place. To get more information about production locations, the brand has frequently asked its suppliers to provide them with information about where Bamboo Clothing's goods are produced.

**Recommendation:** Members are advised to develop a systematic approach to complete the production location list. Part of the approach can be:

1. Automatically include information from the questionnaire, audit reports, and complaints
2. Business relationships with agents include transparency of production locations.
3. 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:** For each supplier, Bamboo Clothing stores all relevant documents on its server. Other information on the compliance status of suppliers is shared among relevant staff verbally and via emails in an informal way.

**Recommendation:** It is advised to make relevant staff aware of the available tools Fair Wear offers, such as the Health and Safety guides, monitoring CAP documents, access to Fair Wear's online information system. Purchasing staff are recommended to share reports from factory visits that include a status update of implementing the CoLP.

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## **Information Management**

**Possible Points: 7**

**Earned Points: 4**

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## 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:** Bamboo Clothing communicates about Fair Wear membership on its website and on social media.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.2 Member company engages in advanced reporting activities.	Supplier list is disclosed to the public.	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.	2	2	0

**Comment:** The brand has disclosed 71% of its total placed FOB factories to other Fair Wear members in the internal Fair Wear system and on the Fair Wear website. Moreover, Bamboo Clothing mentions 71% of its factories on its website.

**Recommendation:** Fair Wear recommends Bamboo Clothing to disclose 100% of production locations to other Fair Wear members in Fair Force and on the Fair Wear 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 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:** Bamboo has submitted its social report to Fair Wear. The social report is also published on Bamboo Clothing's website.

## Transparency

**Possible Points: 6**

**Earned Points: 6**

## 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:** At Bamboo Clothing, regular systemic evaluation of Fair Wear membership occurs with top management. Meetings are held between the Managing Director, the Product Director and the Technical and Sustainability Manager. Because Bamboo Clothing has only been a member for less than two years, these evaluations are yet to be formalised.

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.	No requirements were included in previous Check	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.	N/A	4	-2

**Comment:** In 2022 Bamboo Clothing's first Brand Performance Check took place. Therefore, no actions from last year were available.

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## Evaluation

**Possible Points: 2**

**Earned Points: 2**

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# Recommendations to Fair Wear

Bamboo Clothing did not have any recommendations for Fair Wear.

## Scoring Overview

Category	Earned	Possible
Purchasing Practices	7	50
Monitoring and Remediation	-1	24
Complaints Handling	3	3
Training and Capacity Building	4	5
Information Management	4	7
Transparency	6	6
Evaluation	2	2
Totals:	25	97

### Benchmarking Score (earned points divided by possible points)

26

### Performance Benchmarking Category

Needs Improvement

## Brand Performance Check details

Date of Brand Performance Check:

02-11-2022

Conducted by:

Jason Mandels

Interviews with:

Emily Lawrance- Garment Technologist and Product Developer

Merryn Chilcott - Technical and Sustainability manager

Sally Wolfenden - Head of Buying

Jo Reynolds- Head of Merchandising

Katherine Wright - Merchandising Admin Assistant

Ryan Shannon - Managing Director

Ian Sargent - Head of Production