



Brand Performance Check

HAVEP

This report covers the evaluation period 01-01-2022 to 31-12-2022

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. The online [Brand Performance Check Guide](#) provides more information about the indicators.

Scoring overview

Total score: 126

Possible score: 194

Benchmarking Score: 65

Performance Benchmarking Category: Leader



Summary:

HAVEP has shown advanced results on performance indicators and has made exceptional progress. With a total benchmarking score of 65, the member is placed in Leader category.

In 2022, HAVEP could still feel the symptoms of some unrestful years, with several staff changes in top management and financial challenges. HAVEP is part of the investment group VP Capital, the same as the member brands Van Heurck and Hydrowear. All three member brands cooperate closely together to increase their influence.

HAVEP has a sourcing strategy addressing influencing labour conditions. The member commits to long-term contracts with all of its suppliers. These usually range for three years. 97% of its production turnover comes from North Macedonia and Tunisia by using CMT suppliers. HAVEP owns one factory in North Macedonia, which produces 15% of the total FOB. The local teams are strongly connected to HAVEP and fully integrated into the headquarters team. The local team visits and supports the factories on an almost daily basis and reports in weekly meetings to the HAVEP headquarters staff in the Netherlands. This ensures a fluent information flow and short-term actions in case they are needed to remediate and mitigate issues. In addition, the brand also buys RMG articles from one supplier in Bangladesh. In 2022, HAVEP started sourcing RMG articles from India and Türkiye. Fair Wear strongly recommends HAVEP to evaluate whether the high risks of sourcing in India, Türkiye and India and the required engagement in due diligence in this regard are appropriate for the importance (<3% FOB) to the company.

HAVEP has a systematic approach to identifying human rights risks in its supply chain and has assessed the risks for each production location. For conducting its risk assessment on supplier level, HAVEP uses mainly Fair Wear audits, which include worker and stakeholder input and other third-party audits in its monitoring.

The member brand succeeded in upholding its contribution to the agreed target wages at its own factory in North Macedonia and all suppliers in Tunisia. Therefore, the factories were able to pay CBA agreed wages. The member brand was not able to increase its contribution to raising the wages to the next level but agreed to price increases related to the increase of legal minimum wages and the inflation rate.

In 2023, Fair Wear implemented a new performance check methodology aligned with the OECD guidelines on HRDD. This new methodology raises the bar and includes some new indicators, which may result in a lower score for member brands. Because this is a transition year, Fair Wear lowered the scoring threshold for this year only.

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.

Company Profile HAVEP

Member company information

Member since: 1 Jan 2004

Product types: Workwear

Percentage of CMT production versus support processes 99%

Percentage of FOB purchased through own or joint venture production 15.52%

Percentage of FOB purchased directly 100%

Percentage of FOB purchased through agents or intermediaries 43%

Percentage of turnover of external brands resold 0%

FLA Member No

Member of other MSI's/Organisations International Accord,

Number of complaints received last financial year 0

Basic requirements

Definitive production location data has been submitted for the financial year under review? Yes

Work Plan and projected production location data have been submitted for the current financial year? Yes

Membership fee has been paid? Yes

Production countries, including number of production locations and total production volume.

Production Country	Number of production locations	Percentage of production volume
North Macedonia	4	50.53%
Tunisia	6	46.6%
Türkiye	1	1.5%
India	1	0.85%
Bangladesh	1	0.52%
Viet Nam	1	0%

Layer 1 Foundational system's criteria

Possible Points: 8

Earned Points: 8

1.1 Member company has a Responsible Business Conduct policy adopted by top management.: Yes

Comment: HAVEP has a solid Responsible Business Conduct Policy in place.

1.2 All member company staff are made aware of Fair Wear's membership requirements.: Yes

1.3 All staff who have direct contact with suppliers are trained to support the implementation of Fair Wear requirements.: Yes

1.4 A specific staff person(s) is designated to follow up on problems identified by the monitoring system, including complaints handling. The staff person(s) must have the necessary competence, knowledge, experience, and resources.: Yes

1.5 Member company has a system in place to identify all production locations, including a policy for unauthorised subcontracting.: Yes

1.6 Member company discloses internally through Fair Wear's information management system, in line with Fair Wear's Transparency Policy.: Yes

Comment: HAVEP discloses 100% of production locations internally through Fair Wear's information management system.

1.7 Member company discloses externally on Fair Wear's transparency portal, in line with Fair Wear's Transparency Policy.: Yes

Comment: HAVEP discloses 100% of production locations externally on Fair Wear's transparency portal.

1.8 Member complies with the basic requirements of Fair Wear's communication policy.: Yes

Layer 2 Human rights due diligence, including sourcing strategy and responsible purchasing practices.

Possible Points: 90

Earned Points: 58

Indicators on Sourcing strategy

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.1 Member company's sourcing strategy is focused on increasing influence to meaningfully and effectively improve working conditions.	Intermediate	Fair Wear expects members to adjust their sourcing strategy to increase their influence over working conditions. Members should aim to keep the number of production locations at a level that allows for the effective implementation of responsible business practices.	Strategy document; consolidation plans, examples of implementation.	4	6	0

Comment: HAVEP has a sourcing strategy addressing influencing labour conditions. The sourcing strategy is included in the member brand's Responsible Business Conduct (RBC) policy. The member has 13 active suppliers. 95% of the production volume comes from suppliers where the member has at least 10% leverage at suppliers. 2% of the production volume comes from suppliers where HAVEP buys less than 2% of its total FOB. For more than 70% of the member brands' production volume, HAVEP has significant leverage of 50-100% at its suppliers. This is comparable to the previous year. 97% of its production turnover comes from North Macedonia and Tunisia by using CMT suppliers. HAVEP owns one factory in North Macedonia, which produces 15% of the total FOB. In addition, the brand also buys RMG articles from one supplier in Bangladesh, Turkey and India.

HAVEP's RBC Policy links to the Common Framework for Responsible Purchasing Practices (CFRPP). The CFRPP explicitly focuses on increasing influence through active cooperation with other clients. Furthermore, HAVEP is part of the investment group VP Capital, the same as the member brands Van Heurck and Hydrowear. All three member brands cooperate closely together to increase their influence. HAVEP does not plan to consolidate its supply chain yet; therefore, it is not included in its sourcing strategy.

Recommendation: HAVEP could include in its sourcing strategy a plan to increase influence on suppliers by cooperating with other buyers. Fair Wear also recommends the member to include SMART goals in its sourcing strategy.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.2 Member company's sourcing strategy is focused on building long-term relationships.	Advanced	Stable business relationships underpin the implementation of the Code of Labour Practices and give factories a reason to invest in improving working conditions.	Strategy documents; % of FOB from suppliers where a business relationship has existed for more than five years; Examples of contracts outlining a commitment to long-term relationship; Evidence of shared forecasting.	6	6	0

Comment: HAVEP has a sourcing strategy that focuses on maintaining long-term relationships. 64% of the member's total FOB volume comes from suppliers with whom HAVEP has a business relationship for at least five years. The member commits to long-term contracts with all of its suppliers. These usually range for three years.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.3 Member company conducts a risk scoping exercise as part of its sourcing strategy.	Basic	Human rights due diligence, according to the OECD guidelines, requires companies to undertake a scoping exercise to identify and mitigate potential human rights risks in supply chains of potential business partners.	HRDD policy; Sourcing strategy linked to results of scoping exercise; HRDD processes, including specific responsibilities of different departments; Use of country studies; Analysis of business and sourcing model risks; Use of licensees and/or design collaborations.	2	6	-2

Comment: HAVEP has a risk analysis in line with the OECD requirements. This was done in cooperation with the other two member brands, Hydrowear and Van Heurck. HAVEP conducts risk scoping and includes all eight labour standards. HAVEP uses Fair Wear country studies and other external sources to identify country risks and the likelihood and severity of the risks and then classifies the risks into a risk level and a risk matrix. The member brand has yet to include business model, sourcing model and product level in its risk scoping. The risk scoping includes a gender lens for all labour standards and all countries. HAVEP has yet to include input from workers, suppliers and stakeholders.

In 2022, HAVEP started sourcing in India and Türkiye. For its production countries, HAVEP identified risks such as freedom of association and living wages for North Macedonia and Tunisia, and discrimination, child labour, living wages, excessive overtime and gender-based violence in Bangladesh and India. HAVEP's sourcing strategy also privileges countries where workers can freely form or join a trade union and bargain collectively. The main production countries are North Macedonia and Tunisia, with a total FOB of 97%. The member brand has adjusted its sourcing strategy based on the results of its risk scoping. Therefore, HAVEP would like to continue focusing more on production in Europe and Tunisia. Nevertheless, with less than 3% FOB, the company sources in three high-risk countries: Bangladesh, India and Türkiye.

Recommendation: Fair Wear strongly recommends HAVEP to adjust its sourcing based on the results of its risk scoping. HAVEP should evaluate whether the high risks of sourcing in India, Türkiye and India and the required engagement in due diligence in this regard are appropriate to the importance (<3% FOB) to the company.

Fair Wear also recommends HAVEP to include all risk factors in its risk scoping and to include input from workers, suppliers, and other stakeholders in its risk-scoping exercise.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.4 Member company engages in dialogue with factory management about Fair Wear membership requirements before finalising the first purchase order.	Advanced	Sourcing dialogues aim to increase transparency between the member and the potential supplier, which can benefit improvements efforts going forward.	Process outline to select new factories; Material used in sourcing dialogue; Documents for sharing commitment towards social compliance; Meeting reports; On-site visits; Reviews of suppliers' policies.	4	4	0

Comment: It is the standard process for HAVEP to inform new suppliers about Fair Wear membership. HAVEP defined an onboarding process for new suppliers in its sourcing strategy, which is part of the RBC policy. The process applies before placing the first order. First, HAVEP sends out information about Fair Wear membership, as well as the Fair Wear Code of Labour Practices (CoLP) and the Worker Information Sheet (WIS). Additionally, the member brand requests further information from the potential supplier in a questionnaire to collect more detailed data about other audit results or subcontracting partners. This process has been followed for one supplier in India and one supplier in Türkiye added last year. The factory in India belongs to a production partner that is already working with other brands in the VP Capital Group. The factory was newly opened. In Türkiye, HAVEP started cooperation with the factory already in 2014 as an external producer. Since 2022, the member brand has started a direct business relationship with the factory.

HAVEP works with local teams in its main sourcing countries, Tunisia and North Macedonia. The local teams are strongly connected to HAVEP and fully integrated into the headquarters team. The local team visit potential suppliers as well. In 2022, staff from the purchasing department visited the Indian supplier to ensure the onboarding process. Here, the member brand started a dialogue with suppliers about human rights and how the supplier and HAVEP can cooperate on this topic.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.5 Member company collects the necessary human rights information to inform sourcing decisions before finalising the first purchase order.	Intermediate	Human rights due diligence processes are necessary to identify and mitigate potential human rights risks in supply chains. Specific risks per factory need to be considered as part of the decision to start cooperation and/or place purchasing orders.	Questionnaire with CoLP, reviewing and collecting existing external information, evidence of investigating operational-level grievance system, union and independent worker committee presence, collective bargaining agreements, engaging in conversations with other customers and other stakeholders, including workers.	4	6	0

Comment: HAVEP collects human rights information of potential new suppliers by collecting Fair Wear's supplier questionnaire, collecting existing audit reports and visiting them before production starts. In addition, HAVEP asks new suppliers to fill in its questionnaire to collect more detailed information about subcontracting partners before finalising the first purchasing order. The onboarding of a new supplier is a joint decision of the product development and quality, supply chain and sustainability departments, together with the local country managers in Tunisia and North Macedonia. HAVEP followed this process for its new supplier in India. The factory in Türkiye was not visited in 2022, but after the first bulk production, a Fair Wear audit was conducted. Both factories signed the Fair Wear CoLP, and the WIS is posted.

The member's sourcing strategy does mention a preference for suppliers where workers are free to form or join a trade union and/or bargain collectively. HAVEP does not collect information from workers or stakeholders to inform the sourcing decision.

Recommendation: Fair Wear encourages the member to collect worker and stakeholder input before placing the first order. Fair Wear also recommends HAVEP to investigate whether an operational grievance mechanism exists.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.6 Member actively ensures awareness of the Fair Wear CoLP, the complaints helpline, and social dialogue mechanisms within the first year of starting business.	Basic	This indicator focuses on the preliminary mitigation of risks by actively raising awareness about the Fair Wear Code of Labour Practices and complaints helpline. Discussing Fair Wear's CoLP with management and workers is a key step towards ensuring sustainable improvements in working conditions and developing social dialogue at the supplier level.	Evidence of social dialogue awareness raised through earlier training/onboarding programmes, onboarding materials, information sessions on the factory grievance system and complaints helpline, use of Fair Wear factory guide, awareness-raising videos, and the CoLP.	2	6	0

Comment: HAVEP has added two new suppliers in 2022. The brand has shared information about Fair Wear's CoLP and the complaints helpline during the sustainability assessment ahead of the supplier being chosen. The Worker Information Sheet has been posted. HAVEP's purchasing team visited the supplier in India before bulk production. Here, the Fair Wear CoLP and the complaints helpline were introduced. HAVEP has not yet organised onboarding sessions for its new suppliers to raise awareness about the Fair Wear CoLP and the complaints helpline or the importance of social dialogue.

Recommendation: HAVEP is recommended to organise onboarding sessions specifically focusing on the CoLP and the complaints mechanism within the first year of doing business.

Indicators on Identifying continuous human rights risks

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.7 Member company has a system to continuously monitor human rights risks in its supply chain.	Intermediate	Members are expected to regularly evaluate risk in a systematic manner. The system used to identify human rights risks determines the accuracy of the risks identified and, as such, the possibilities for mitigation and remediation.	Use of risk policies, country studies, audit reports, other sources used, how often information is updated.	4	6	0

Comment: HAVEP has a systematic approach to identifying human rights risks in its supply chain and has assessed the risks for each production location. For conducting its risk assessment on supplier level, HAVEP uses mainly Fair Wear audits and Corrective Action Plan (CAP) findings, which include worker and stakeholder input and other third-party audits in its monitoring. Fair Wear audits are conducted every three years. For its suppliers in Bangladesh and India, HAVEP mainly referred to external audits in 2022. For these production facilities, the brand's monitoring tools do not explicitly include worker, stakeholder or supplier input. The monitoring outcomes and the common risks as identified in HAVEP's risk assessment, are aligned.

For the production facilities in North Macedonia and Tunisia, the local team conducts visits on a regular basis and reports in weekly meetings to the HAVEP headquarters staff in the Netherlands. This ensures a fluent information flow and short-term actions in case they are needed to remediate and mitigate issues. This also allows HAVEP to frequently adjust the risk assessment based on that information. The staff from the purchasing department visit the suppliers on a regular basis and provides feedback through visit checklists. The risk assessment does include an assessment of the likelihood and severity and a risk matrix. The highest risks were identified for suppliers in Türkiye, Bangladesh and India about FoA, excessive overtime and health and safety.

Regarding the Enhanced Human Rights Due Diligence Policy for fire, structural and electrical safety in Bangladesh, HAVEP sources from one factory that the RMG Sustainability Council (RSC) covers. HAVEP is a signatory of the International Accord.

Recommendation: Fair Wear recommends that HAVEP does not depend on audits and onsite visits alone and expands its monitoring instruments. Fair Wear also recommends HAVEP to assess whether the member causes, contributes or is linked to the identified risks.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.8 Member company's continuous monitoring of human rights risks includes an assessment of freedom of association (FoA).	Intermediate	Freedom of association and collective bargaining are 'enabling rights.' When these rights are respected, they pave the way for garment workers and their employers to address and implement the other standards in Fair Wear's Code of Labour Practices - often without brand intervention.	Use of supplier questionnaire to inform decision-making, collected country information, and analyses.	4	6	0

Comment: HAVEP has mapped the risks to FoA in all its sourcing countries and can explain the main risks per country. This includes the risks to women workers. HAVEP uses country-level information to understand the risks to its suppliers as well. The member has basic supplier-level monitoring in place to assess and understand the FoA-risks at suppliers. The brand knows from audit reports which suppliers have worker committees or trade unions and if they are active. A Company Consultative Committee (CCC) is active at its factories in Tunisia, and a collective bargaining agreement is in place.

For instance, HAVEP identified that trade unions are not very popular in North Macedonia and that there is a lack of awareness and trust of the role and benefits of trade unions and workers' rights to join and form trade unions. HAVEP identified a high risk of FoA for its Indian factory. The member brand is aware that there are worker representatives in the factory, but due to the language barrier, it did not collect further information in 2022.

Recommendation: HAVEP is recommended to use the Supplier Questionnaire from Fair Wear's FoA Guide to assess and understand the risk regarding violation of FoA at its suppliers. HAVEP should include risks specific to women workers in its risk assessment regarding FoA at its suppliers.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.9 Member company includes a gender analysis throughout their continuous monitoring of human rights risks, to foster a better understanding of gendered implications.	Basic	Investing in gender equality creates a ripple effect of positive societal outcomes. Members must apply gender analyses to their supply chain to better address inequalities, violence, and harassment.	Evidence of use of the gender mapping tools and knowledge of country-specific fact sheets.	2	6	0

Comment: HAVEP has included gender in its risk scoping. The member could show it understands the basic gender risks for its sourcing countries and, for instance, identified sexual harassment, gender-based violence, gender equality and discrimination as significant risks prevalent in India, Bangladesh and Türkiye. The risk scoping includes a gender lens by analysing the risks of all eight labour standards.

Additionally, HAVEP started collecting gender data for two factories in Tunisia. Here, the member brand focused on collecting data on gender division per job role, demographics and whether there is an active anti-harassment committee. This information is not yet included in the risk assessment. HAVEP has not specifically looked into how its business practices affect gender at its suppliers.

Recommendation: HAVEP is recommended to collect gender data per factory related to every Code of Labour Practices. Fair Wear also recommends HAVEP to enrol in the Introduction to Gender Equality programme on Fair Wear’s learning platform.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.10 Member company considers a production location’s human rights performance in its purchasing decisions.	Advanced	Systematic evaluation is part of continuous human rights monitoring. A systematic approach to evaluating production location performance is necessary to integrate social compliance into normal business processes and to support good decision-making.	Supplier evaluation format, meeting notes on supplier evaluation shared with the factory, processes outlining purchasing decisions, link to responsible exit strategy.	4	4	0

Comment: HAVEP has a strong and systematic evaluation system for assessing suppliers' human rights performance. HAVEP evaluates its suppliers based on a balanced scorecard principle, where factories are assessed on Corporate Social Responsibility (CSR), quality, product development and supply chain efficiency criteria. In comparison to other criteria, CSR accounts for 50% of the overall rating. The results of the supplier evaluation are discussed with the suppliers for improvement discussions. HAVEP does not share the outcome of the evaluation with worker representatives.

The outcome of this evaluation influences purchasing decisions. For instance, good suppliers are rewarded with long-term contracts. If a supplier scores in a lower category, the CSR staff and purchasing department will be in close contact with the supplier and have many discussions, as well as onsite visits, which will follow.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.11 Member company prevents and responds to unauthorised or unknown production and/or subcontracting.	Insufficient	Subcontracting can decrease transparency in the supply chain and has been demonstrated to increase the risk of human rights violations. Therefore, when operating in higher-risk contexts where it is likely subcontracting occurs, the member company should increase due diligence measures to mitigate these risks.	Production location data provided to Fair Wear, financial records from the previous financial year, evidence of member systems and efforts to identify all production locations (e.g., interviews with factory managers, factory audit data, web shop and catalogue products, etc.), licensee contracts and agreements with design collaborators.	0	4	0

Comment: HAVEP takes measures to prevent unauthorised subcontracting or unknown locations. HAVEP has written contracts with its suppliers. The contracts include that unauthorised subcontracting is not allowed. HAVEP has local staff in Tunisia and North Macedonia, who visit the production locations almost daily. The factory in India was also visited by staff from the purchasing department in 2022 several times. Here, the factory has a vertical production approach.

HAVEP did not visit the factories in Bangladesh and Türkiye last year. In 2022, one Fair Wear audit took place at the factory in Türkiye and identified a list of several subcontracting partners of that factory. HAVEP did not follow up on this finding in 2022.

Recommendation: HAVEP is recommended to use the outcomes of its human rights monitoring to prevent unauthorised subcontracting, especially for its suppliers in Türkiye and Bangladesh. This can mean the member ensures the supplier is visited during production for locations with a higher risk of unauthorised subcontracting.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.12 Member company extends its due diligence approach to homeworkers.	Intermediate	Homeworkers should be viewed as an intrinsic part of the workforce, entitled to receive equal treatment and have equal access to the same labour rights, and therefore should be formalised to achieve good employment terms and conditions.	Supplier policies, evidence of supplier and/or intermediaries' terms of employment, wage-slips from homeworkers.	2	4	0

Comment: HAVEP has identified whether homework is prevalent in its sourcing countries. According to the member, there is a very low risk of homeworkers being used by its suppliers because the brand has been checking with the help of the annual questionnaire if homeworkers are used. So far, no supplier reported the use of homeworkers. The member brand has detailed insights into production processes through the local staff in Tunisia and North Macedonia. Here, the member can validate the suppliers' statements that no homeworkers are used.

Since external or Fair Wear audits in Bangladesh, India, and Türkiye have also not identified homeworkers, HAVEP assumes that homeworkers are not used for its orders. The member has not had a conversation about this with its suppliers.

Recommendation: Fair Wear recommends HAVEP to conduct a capacity analysis for looking into specific production processes to validate the suppliers' statements that no homeworkers are used, especially for production countries without local staff onsite.

Indicators on Responsible purchasing practices

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.13 Member company's written contracts with suppliers support the implementation of Fair Wear's Code of Labour Practices and human rights due diligence, emphasising fair payment terms.	Insufficient	Written, binding agreements between brands and suppliers, which support the Fair Wears CoLP and human rights due diligence, are crucial to ensuring fairness in implementing decent work across the supply chain.	Suppliers' codes of conduct, contracts, agreements, purchasing terms and conditions, or supplier manuals.	0	4	0

Comment: HAVEP uses long-term contracts for all of its suppliers. These usually range for three years. The member brand has different contracts for CMT suppliers (Tunisia and North Macedonia) and RMG suppliers (India, Bangladesh, Türkiye), especially when it comes to price and payment. All contracts include topics of liability and penalties for late deliveries. Although the contract includes the Fair Wear membership and the Code of Labour Practices, it does not support human rights due diligence because an unequal burden is placed on the suppliers by having penalties for non-compliance with the confirmed delivery date without proof of fault by the supplier.

The paragraph on liability puts an unequal burden on the suppliers by making them liable for defective products they produced without proof of fault by the supplier. Any deviation from the delivery is only possible after written approval from HAVEP. Any failure to meet the delivery date shall be considered a material breach of the agreement. If the supplier does not deliver within the cure period of 10 days, a standard compensation will apply unless specifically agreed otherwise between the supplier and HAVEP. The payment terms are different for CMT and FOB suppliers. CMT suppliers have regular payment terms of two weeks. HAVEP pays all orders of RMG suppliers upon receiving the bill of lading. In case suppliers ask for it, HAVEP prepaid parts of orders to pre-finance the costs for the fabrics. This was verified during the performance check.

These contracts do not yet mention the shared responsibilities of CoLP implementation.

Requirement: HAVEP should evaluate its contracts to ensure that it does not place an unequal burden on its suppliers or include terms that limit the possibility of implementing the Code of Conduct.

Recommendation: The member brand could use the Common Framework of Responsible Purchasing Practices (CFRPP), which is part of the RBC policy, for inspiration on how to draft a fair contract.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.14 Member company has formally integrated responsible business practices and possible impacts on human rights violations in their decision-making processes.	Intermediate	Corporate Social Responsibility (CSR), purchasing, and other staff that interact with suppliers must be able to share information to establish a coherent and effective strategy for improvements. This indicator examines how this policy and Fair Wear membership requirements are embedded within the member company.	Internal information systems, status Corrective Action Plans, sourcing score- cards, KPIs listed for different departments that support CSR efforts, reports from meetings from purchasing and/or CSR staff, and a systematic manner of storing information.	4	6	0

Comment: There is an active interchange of information between CSR and other departments to enable coherent and responsible business practices. The VP Capital Group works with specific KPIs on a governance level. Nevertheless, the member has not yet included responsible business practices in job role competencies, nor do sourcing and purchasing staff work with Key Performance Indicators (KPIs), supporting good sourcing and pricing strategies.

Recommendation: HAVEP could include responsible business practices in its job role competencies of sourcing and purchasing staff.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.15 Member company's purchasing practices support reasonable working hours.	Advanced	Members' purchasing practices can significantly impact the levels of excessive overtime at factories.	Proof that planning systems have been shared with production locations, examples of production capacity knowledge that is integrated into planning, timely approval of samples, and proof that management oversight is in place to prevent late production changes.	6	6	0

Comment: HAVEP has a strong and long-term production planning in place. HAVEP has a production forecast system and knows the production minutes needed per style and the capacity per supplier. For 97% of its total production volume, the brand delivers CMT orders and also supplies the fabric and trimmings to the factories on a weekly basis. The CMT orders are distributed according to the agreed capacity and supplier's experience with each article. HAVEP produces RMG articles in Bangladesh, India and Türkiye. Most of the products are never-out-of-stock articles (NOS). Therefore, HAVEP does not have seasonal production. Because of this, it is also possible for HAVEP to build up a stock of more than four to five months in order to be able to respond to short-term demand.

There is a fixed lead time for each supplier, normally between eight to ten weeks for orders from North Macedonia and Tunisia and around 25 weeks for orders from Bangladesh or India. These lead times already include some margin in case of late deliveries. Besides a full annual plan, the planning system provides monthly detailed production updates to the suppliers. Suppliers can make adjustments and send feedback based on real capacity availability. In case an issue is found, the system can replan immediately. In weekly meetings, the supply chain manager, planning department, sustainability and country managers discuss the order situation; the supplier's feedback is included in these discussions.

In 2022, the member brand still faced material delays, similar to 2021. To avoid production stoppage, orders were swapped depending on the availability of the material stock. Through its local teams, HAVEP was actively engaged with its suppliers and supported them where needed.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.16 Member company can demonstrate the link between its buying prices and wage levels at production locations.	Advanced	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, cost sheets including labour minutes.	6	6	0

Comment: HAVEP knows the production minutes per style to determine prices. The indicators for setting prices include production minutes, factory efficiency and labour costs. The labour costs are integrated into the member brands' ERP system (Enterprise Resource Planning); hence all buyers are aware of the labour costs per style. The production costs are agreed upon by signing the contracts. This practice is used for all CMT suppliers (97%), but not for RMG suppliers in India, Bangladesh and Türkiye (3%).

The sustainability manager collects data on the production efficiency of the North Macedonian and Tunisian suppliers, the working minutes per style, overhead costs, wages being paid, legal minimum wages, CBA (collective bargaining agreement) wages, national average wages, industry wages and living wages according to Fair Wear's wage ladder. The evaluation of these data indicates the link of the buying prices to the wages, and in addition, reveals the wage gap. For the RMG Bangladesh supplier, this data is not yet available.

The member includes changes in legal minimum wage or inflation in its buying prices. HAVEP verifies if wages are increased and requests samples of wage slips to compare old and new wages after price increases.

Recommendation: Fair Wear encourages HAVEP to provide its RMG supplier with training on product costing and how to quote prices, including (direct and indirect) labour costs. Fair Price product owners are available to conduct such training in all Fair Wear countries.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.17 All sourcing intermediaries play an active role in upholding Fair Wear's Code of Labour Practices and ensure transparency about where production takes place.	Advanced	Intermediaries have the potential to either support or disrupt CoLP implementation. It is members' responsibility to ensure production relation intermediaries actively support the implementation of the CoLP.	Correspondence with intermediaries, trainings for intermediaries, communication on Fair Wear audit findings, etc.	4	4	0

Comment: HAVEP's sourcing model purposely excludes the use of sourcing intermediaries.

Layer 3 Prevention, mitigation and remediation

Possible Points: 86

Earned Points: 54

Indicators on the quality and coherence of a members' prevention and remediation system

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.1 Member company integrates outcomes of human rights risk identification (layer 2) into prioritisation and follow-up programmes according to the risk profile.	Basic	Based on the risk assessment outcomes, a factory risk profile can be determined with accompanying intervention strategies, including improvement and prevention programmes.	Overview of supplier base with accompanying risk profile and follow-up programmes.	2	6	0

Comment: HAVEP started creating follow-up plans for its suppliers of its high-risk sourcing countries based on audit reports. The follow-up plans do not specifically take the supplier's risk assessment into account. The follow-up plans describe a general contextualisation and the brand' monitoring actions. Here, the member brand heavily relies on CAPs. No prioritisation or concrete follow-up plans have yet been drafted.

Recommendation: Fair Wear recommends the member to further complete/improve its follow-up plans.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.2 Member company's improvement and prevention programmes include a gender lens.	Basic	The prevention and improvement programmes should ensure equitable outcomes. Thus, a gender lens should be incorporated in all programmes regardless of whether or not the programme is specifically about gender.	Proof of incorporation of the gender lens in follow up programmes, including stakeholder input.	2	6	0

Comment: HAVEP mainly collected data on gender at country level and started to collect data for two factories in Tunisia. The collected data shows the division per job role, especially for the supervisor role in the factory. The member brand analysed if there are anti-harassment committees in the factories. Here, HAVEP started a dialogue with its suppliers and provided its suppliers with additional guidance. HAVEP plans to collect gender-disaggregated data per factory within the next financial year.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.3 Member company's improvement and prevention programmes include steps to encourage freedom of association and effective social dialogue.	Intermediate	Freedom of Association and Collective Bargaining are enabling rights. Therefore, ensuring they are prioritised in improvement and prevention programmes can help support improvements in all other areas.	Available prevention and improvement programmes, including stakeholder input.	4	6	0

Comment: HAVEP included some steps to encourage FoA and effective social dialogue in its improvement or prevention actions. HAVEP stays informed to check if the elected worker representatives in North Macedonia and Tunisia are involved in meaningful discussions. The local staff in Tunisia and North Macedonia is in constant dialogue with the worker representatives.

In Tunisia, the garment workforce's key trade union is the Tunisian General Union of Workers (UGTT). The UGTT represents the interests of garment workers and has played a strong role in the negotiation of working conditions and collective bargaining agreements (CBA) in the garment industry in Tunisia. All suppliers in Tunisia, where HAVEP is producing, follow CBA remuneration.

In 2022, one production location in Tunisia joined the Social Dialogue Pilot Project, organised by Fair Wear. The pilot training was organised for factory management, supervisors and worker representatives and focused on a well-functioning social dialogue in the factory.

HAVEP did not yet include steps to encourage FoA and effective social dialogue in its improvement and prevention programmes for the suppliers in Türkiye, Bangladesh and India. Additionally, the member has yet to apply a gender lens and ensure its steps to promote FoA and effective social dialogue address the specific risks for female workers.

Recommendation: HAVEP is recommended to support in financing/coordinating training on FoA and social dialogue for its suppliers.

Fair Wear recommends HAVEP to apply a gender lens and ensure its steps to promote FoA and effective social dialogue address the specific risks for female workers.

Fair Wear recommends HAVEP to be more comprehensive and include steps to promote FoA and effective social dialogue in its improvement and prevention actions in India, Türkiye and Bangladesh.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.4 Member company actively supports operational-level internal grievance mechanism.	Intermediate	Fair Wear's complaints helpline is a safety net in case local grievance mechanisms do not provide access to remedy. Members are expected to actively support and monitor the effectiveness of operational-level grievance mechanisms as part of regular contact with their suppliers.	Communication with suppliers, responses to grievances, minutes of internal worker committees, evidence of democratically elected worker representation, evidence of handled grievance, review of factory policies, and proof of effective social dialogue.	4	6	0

Comment: HAVEP's local staff in Tunisia and North Macedonia check on a regular basis if the internal grievance mechanism is working and ask if worker representatives are involved in the follow-up of the filed complaints. In some cases, HAVEP's local staff is also involved in solving the complaints. For all suppliers in North Macedonia, HAVEP developed a written grievance procedure that is shared with the factory management and worker representatives.

For its suppliers in India, Bangladesh and Türkiye, HAVEP monitors the effectiveness of internal grievance mechanisms via audits and asks follow-up questions in the CAP in case of findings. However, the member has yet to actively support internal grievance mechanisms at these suppliers.

Recommendation: Fair Wear recommends HAVEP to respond when internal grievance mechanisms are not functioning.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.5 Member company collaborates with other Fair Wear members or customers of the production location.	Advanced	Cooperation between Fair Wear members increases leverage and the chances of successful outcomes. Cooperation also reduces the chances of a factory needing to conduct multiple improvement programmes about the same issue with multiple customers.	Communication between different companies.	6	6	0

Comment: HAVEP and two Fair Wear member brands are part of an investment company (VP Capital) and actively cooperate together. In future, the cooperation will be extended. In addition, HAVEP cooperates with other Fair Wear brands at a shared factory in Tunisia. In Bangladesh, HAVEP also cooperates with other buyers when it comes to the follow-up of the RSC CAPs.

Indicators on implementation: improvement and prevention

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.6 Degree of progress towards implementation of improvement programme per relevant factory.	36%	Fair Wear expects members to show progress towards the implementation of improvement programmes. Members are expected to be actively involved in the examination and remediation of any factory-specific problem.	Progress reports on improvement programmes.	4	6	-2

Comment: In the past financial year, HAVEP has received three Fair Wear audit reports from Tunisia and Türkiye and one external report from its factory in Bangladesh. During the performance check, the member could demonstrate with a sample that one-third of the CAP issues requiring improvement actions have been followed up. Improvement actions relate primarily to health and safety findings or lack of effective internal grievance mechanisms. The CAP issues that require improvement actions and are still open are more complex or structural issues and, therefore, need more time to be remediated. These are primarily issues related to overtime and wages.

HAVEP started to terminate the business relationship with one factory in Tunisia last year. Here, the CAP follow-up was shared with other Fair Wear member brands, which took over the CAP follow-up.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.7 Degree of progress towards implementation of prevention programme.	Basic progress	Fair Wear expects members to show progress towards the implementation of prevention programmes. With this indicator, Fair Wear assesses the degree of progress based on the percentage of actions addressed within the set timeframe.	Update on prevention programmes.	2	6	-2

Comment: HAVEP has identified some root causes of the CAP issues, especially related to health and safety findings or lack of effective internal grievance mechanisms and discussed these with its suppliers. The member has not yet started to develop some preventive steps addressing these root causes.

Recommendation: Fair Wear recommends HAVEP to translate its root cause analysis into concrete preventive actions as part of the risk profiles.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.8 Member company validates risk profile and maintains regular dialogue with factories where no improvement or prevention programme is needed.	No factories in the respective risk profile	When no improvement or prevention programme is needed, Fair Wear expect its member companies to actively monitor the risk profile and continue to mitigate risks and prevent human rights abuses.	Use of Fair Wear workers awareness digital tool to promote access to remedy. Evidence of data collected, worker interviews, monitoring documentation tracking status quo.	N/A	6	0

Comment: HAVEP has no suppliers where improvement or prevention steps are not needed.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.9 Degree to which member company mitigates root causes of excessive overtime.	Advanced	Member companies should identify excessive overtime caused by the internal processes and take preventive measures. In addition, members should assess ways to reduce the risk of external delays.	This indicator rewards self-identification of efforts to prevent excessive overtime. Therefore, member companies may present a wide range of evidence of production delays and how the risk of excessive overtime was addressed, such as: reports, correspondence with factories, collaboration with other customers of the factory, use of Fair Wear tools, etc.	6	6	0

Comment: In the previous year, all four audits did not mention excessive overtime. The Fair Wear audit from the Turkish supplier shows that the total working time per week exceeds the legal limit but is not over 60 hours. It has been determined that the daily working hours in the factory exceed with 11 hours. Here, the estimated leverage of HAVEP is around 0,5%. HAVEP plans a visit onsite for 2023 to further discuss how overtime hours could be reduced and to better understand the root causes.

The brand's local staff and suppliers are discussing possible overtime, and its discussed within the brand's internal meetings. Article and late style changes are not applicable as workwear styles remain the same for a long time period. The brand has a material stock in the Netherlands. In addition, there is a material stock for basic styles in North Macedonia and a small material stock in Tunisia. Orders are distributed with priority categories, and in case needed, some articles can also be shifted from one supplier to another supplier.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.10 Member company adequately responds if production locations fail to pay legal wage requirements and/or fail to provide wage data to verify that legal wage requirements are paid.	Intermediate	Fair Wear members are expected to actively verify that all workers receive legal minimum wage. If a supplier does not meet the legal wage requirements or is unable to show they do, Fair Wear member companies are expected to hold the management at the production location accountable for respecting local labour law.	Complaint reports, CAPs, additional emails, Fair Wear Audit Reports or additional monitoring visits by a Fair Wear auditor, or other documents that show the legal wage issue is reported/resolved.	2	4	-2

Comment: Fair Wear audits of 2022 at two Tunisian suppliers and the Turkish supplier revealed that allowances and benefits were not paid as legally required. HAVEP followed up on this finding. The brand and the supplier started an investigation into how many workers did not receive the legally required allowances and benefits. In 2022, HAVEP discussed possible solutions to ensure the entire bonus is paid correctly.

Recommendation: HAVEP is highly recommended to carefully cross-check the information about the payment of legal minimum wages, especially when it comes to findings related to national and labour law. Fair Wear's local teams can support the verification of information.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.11 Degree to which member company assesses and responds to root causes of wages lower than living wages in production locations.	Intermediate	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.	Member companies may present a wide range of evidence of how payment below living wage was addressed, such as: internal policy and strategy documents, reports, wage data/wage ladders, gap analysis, correspondence with factories, etc.	4	6	0

Comment: As described in indicator 2.16, HAVEP has detailed knowledge about the labour prices and wage gaps at all CMT suppliers. HAVEP has an overview of the wage levels at its suppliers in Tunisia, North Macedonia and Turkey and knows the gap towards the estimated living wage. HAVEP does not yet have the same overview for its suppliers in India and Bangladesh. Especially for Tunisia and North Macedonia, HAVEP identified the root causes of wages lower than living wages because of the high inflation in 2022.

A couple of years ago, the member brand started exploring possibilities on how to ensure and support living wages and has taken several steps since then, including conversations with its suppliers on implementing living wages, followed by price increases and Fair Wear labour costing training sessions. Target wage agreements have been made and financially supported (for more information, see indicators 3.12 and 3.13).

Recommendation: Fair Wear encourages HAVEP to discuss with suppliers in Bangladesh, Türkiye and India about different strategies to work towards higher wages and develop a systemic and time-bound approach as well.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.12 Member company determines and finances wage increases.	Intermediate	Member companies should have strategies in place to contribute to and finance wage increases in their production locations.	Analysis of wage gap, strategy on paper, demonstrated roll out process.	4	6	0

Comment: In North Macedonia, the target wage is set as the number of actual living costs estimated in the country by the Trade Unions (TU), based on two earners per family. The Fair Wear audit of 2020 at the member brand's own factory confirms the payment of target wages, and some workers are earning even more. Due to increased costs of living because of the inflation, HAVEP also increased its prices.

For Tunisia, all HAVEP production locations follow CBA remuneration schedules, which is confirmed in Fair Wear audits. The target wages are agreed upon with the suppliers; however, no agreement is fixed in written form yet.

Recommendation: Fair Wear strongly recommends agreeing on target wages in a written agreement with all suppliers, including the RMG supplier in Bangladesh, India and Türkiye. Fair Wear encourages HAVEP to continue its efforts to support the payment of higher wages, especially in Tunisia, by defining the next target wages that go beyond the CBA agreements. This could be realised by a step-by-step implementation plan agreed upon with the trade unions, worker representatives and suppliers. Long-term contracts for the supplier are beneficial to support this process.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.13 Percentage of production volume where the member company pays its share of the living wage estimate.	48%	Fair Wear requires its member companies to act to ensure a living wage is paid in their production locations to each worker.	Member company's own documentation such as reports, factory documentation, evidence of Collective Bargaining Agreement (CBA) payment, communication with factories, etc.	4	6	0

Comment: Fair Wear audits of 2020, 2021 and 2022 conducted at the brand's own factory in North Macedonia and five suppliers in Tunisia show wage levels that are according to the target wage (North Macedonia) and CBA wage level (Tunisia). These production locations represent 48% of HAVEP's total production volume. Due to the high inflation rate, HAVEP also increased the prices.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.14 Member addresses grievances received through Fair Wear's helpline in accordance with the Fair Wear Complaints Procedure.	No complaints received	Members are expected to actively support the operational-level grievance mechanisms as part of regular contact with their suppliers. The complaints procedure provides a framework for member brands, emphasising the responsibility towards workers within their supply chain.	Overview of supporting activities, overview of grievances received and addressed, etc.	N/A	4	-2

Comment: HAVEP received no complaints in the past financial year.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.15 Degree to which member company implements training appropriate to the improvement or prevention programme.	Basic	Training programmes can play an important role in improving working conditions, especially for more complex issues, such as freedom of association or gender-based violence, where factory-level transformation is needed.	Links between the risk profile and training programme, documentation from discussions with management and workers on training needs, etc.	2	6	0

Comment: In the past year, three suppliers from Tunisia were enrolled in Fair Wear's WEP Basic module. The decision to provide training to its suppliers depends on the improvement and remediation plans based on audit results and complaints as well as the outcome of continuous monitoring. The member has not yet enrolled all of its suppliers with findings on 'no awareness about CoLP' or 'communication between workers and factory management should be strengthened'.

Recommendation: HAVEP is recommended to implement training for all factories where this is part of its improvement and/or prevention programme.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.16 Degree to which member company follows up after a training programme.	Intermediate	Training is a crucial tool to support transformative processes but complementary activities such as remediation and changes at the brand level are needed to achieve lasting impact	Evidence of engagement with factory management regarding training outcomes, documentation on follow-up activities, and proof of integration into further monitoring and risk profiling efforts.	4	6	0

Comment: HAVEP followed up on the implemented training by adding relevant findings and outcomes of the training to the CAP follow-up. HAVEP and the local staff in Tunisia discussed the training with the factory management afterwards. Due to the training report, HAVEP decided to request a follow-up audit in 2023.

Recommendation: Fair Wear recommends HAVEP to use the training results as input for HAVEP’s human rights risk monitoring.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.17 The member company’s human rights risk monitoring system includes a responsible exit strategy.	Advanced	Withdrawing from a non-compliant supplier should only be the last resort when no more impact can be gained from other strategies. Fair Wear members must follow the steps as laid out in the responsible exit strategy.	Exit strategy policy, examples of supplier communications.	4	4	0

Comment: HAVEP’s human rights risk monitoring includes a responsible exit strategy. When HAVEP decides to exit, they agree with the production location about the exit strategy. In the responsible exit strategy, it is highlighted that HAVEP informs the supplier as soon as the decision has been made, at least one season ahead, to allow the factory management to find new customers and orders to fill their capacities.

In the past financial year, the member stopped business with one supplier in Tunisia. The leverage of HAVEP was 100%. In that specific case, the factory owner closed the factory. The last production order was placed in 2021. Since then, HAVEP had several conversations with the factory owner, and the local staff followed up if workers received the severance payments. Even three months after the factory was closed, the workers were still being paid their salaries.

The responsible exit strategy is part of HAVEP's RBC policy, which was shared with all suppliers.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.18 Member company’s measures, business practices and/or improvement programmes go beyond the indicators or scope.	Member company’s activities do not go beyond the indicators or scope.	Fair Wear would like to reward and encourage members who go beyond the Fair Wear policy or scope requirements. For example, innovative projects that result in advanced remediation strategies, pilot participation, and/or going beyond tier 2.	Overview of Human Right risk monitoring, remediation and prevention activities and processes.	N/A	6	0

Comment: HAVEP does not undertake activities related to human rights that go beyond Fair Wear's scope.

Layer 4 External communication, outreach, learning, and evaluation

Possible Points: 18

Earned Points: 14

Indicators related to communication

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.1 Member company actively communicates about Fair Wear membership and its human rights due diligence efforts.	Advanced	Fair Wear membership includes the need for a brand to show its efforts, progress, and results. Fair Wear members have the tools and targeted content to showcase accountability and inform customers, consumers, and retailers. The more brands communicate about their sustainability work, the greater the overall impact of the work of the Fair Wear member community.	Member website, sales brochures, and other communication materials.	4	4	0

Comment: HAVEP communicates accurately about Fair Wear membership on its website.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.2 Member company sells external brands with a Human Rights Due Diligence system (if applicable).	No reselling of external brands	Some member companies resell other brands, which Fair Wear refers to as 'external production'. These members are expected to investigate the Human Rights Due Diligence system of these other brands, including production locations and the availability of monitoring information.	External production data in Fair Wear's information management system, collected information about other brands' human rights due diligence systems, and evidence of external brands being part of other multi-stakeholder initiatives that verify their responsible business conduct.	N/A	4	0

Comment: HAVEP does not sell external brands.

Indicators related to brand and supply chain transparency

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.3 Social report is submitted to Fair Wear and is published on the member company's website.	Advanced	The social report is an important tool for member companies to share their efforts with stakeholders transparently. The social report explicitly refers to the workplan and the yearly progress related to the brands goals identified in the workplan.	Social report.	4	4	0

Comment: HAVEP has submitted its social report, which Fair Wear approved.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.4 Member company engages in advanced reporting activities.	Intermediate	Good reporting by members helps ensure the transparency of Fair Wear's work and helps share best practices within the industry. This indicator reviews transparency efforts reported beyond (or included in) the social report.	Brand Performance Check, audit reports, information about innovative projects, specific factory compliance data, disclosed production locations (list tier 2 and beyond), disclosure of production locations, alignment with the Transparency Pledge.	2	4	0

Comment: HAVEP published its supplier list, the Brand Performance Check report and the Social report on its website. This information includes the name and address of the supplier as well as audit results. It does not yet include the time-bound improvement plans it has for each supplier.

Recommendation: HAVEP is recommended to publish time-bound plans for its suppliers.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.5 Member company has a system to track implementation and validate results.	Intermediate	Progress must be checked against goals. Members are expected to have a system in place to track implementation and validate the progress made.	Documentation of top management involvement in systematic annual evaluation includes meeting minutes, verbal reporting, PowerPoint presentations, etc. Evidence of worker/supplier feedback.	4	6	0

Comment: HAVEP has a system to track progress and check if implemented measures have effectively prevented and remediated human rights violations. The internal evaluation system involves top management. In its evaluation system, the member brand does not yet include triangulated information from external sources.

Recommendation: The member is advised to include feedback from workers and suppliers in its evaluation system.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.6 Level of action/progress made on requirements from previous Brand Performance Check.	No requirements were included in the previous Brand Performance 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 should show documentation related to the specific requirements made in the previous Brand Performance Check.	N/A	4	-2

Comment: In the previous performance check, no requirements were included.

5 Appreciation chapter

5.1 Member company publicly responded to problems/allegations raised by consumers, the media, or NGOs.: Not applicable

5.2 Member company actively participated in lobby and advocacy efforts to facilitate an enabling environment in production clusters.: Not applicable

5.3 Member company actively contributed to industry outreach, visibility, and learning in its main selling markets.: Not applicable

Recommendations to Fair Wear

In general, HAVEP is positive about Fair Wear's data system and the tools that facilitate brands to implement the HRDD approach. Nevertheless, Havep would like to see a simpler system for handling CAPs. HAVEP also appreciated the cooperation with the brand liaison. HAVEP recommends Fair Wear to be more transparent about further developments within the membership.

Brand Performance Check details

Date of Brand Performance Check: 23-08-2023

Conducted by: Victoria Lauer

Interviews with: Els de Ridder (CSR)

Abdessalem Ben Abdallah