

# **Brand Performance Check W.A.R.D. GmbH (Iriedaily)**

This report covers the evaluation period 01-01-2021 to 31-12-2021

#### **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 <a href="https://www.fairwear.org">www.fairwear.org</a>. The online <a href="https://www.fairwear.org">Brand Performance Check Guide</a> provides more information about the indicators.

#### On COVID-19

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**

## W.A.R.D. GmbH (Iriedaily)

**Evaluation Period: 01-01-2021 to 31-12-2021** 

Member company information	
Headquarters:	Berlin , Germany
Member since:	2015-12-31
Product types:	Garments, clothing, fashion apparel; Sports & activewear; Bags; Accessories
Production in countries where Fair Wear is active:	China
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	90%
Benchmarking score	87
Category	Leader

#### **Summary:**

Iriedaily has shown advanced progress and met most of Fair Wear's performance requirements. The benchmarking score of 87 means that Fair Wear has again awarded Iriedaily the 'Leader status'. Although the monitoring threshold does not determine the category this year, Iriedaily has fulfilled the monitoring requirements at suppliers responsible for 90 % of its production volume.

#### **Corona Addendum:**

Despite the impact of COVID-19, Iriedaily has had a good business year with a stronger focus on online sales in 2021.

Iriedaily was in regular contact with its agents and factories to learn about the issues they faced regarding COVID-19. The agents are seen as the brand's eyes on the ground and provide support in fulfilling its due diligence. In addition, the brand conducted a COVID-19 supplier survey twice. The supplier survey contained questions about the overall situation in the country, the impact of COVID-19 on production and the health and safety measures in the factory. COVID-19 did not impact 2021 as severely as 2020. There were no national/regional lockdown periods in China or Portugal, factories had implemented concrete protective health measures, and most workers were vaccinated. As main risks, Iriedaily identified: production and delivery issues and health and safety at the workplace.

From the conversations with suppliers, Iriedaily learned that many faced production and delivery delays. Iriedaily responded to that by being flexible and adapting its delivery dates. Iriedaily also offered a financial guarantee so that factories could purchase raw material at an earlier stage to deal with the increasing raw material prices.

In 2021, Iriedaily expanded its risk assessment by mapping its supply chain further down the tier. In addition, Iriedaily has improved its go-to-market plan with the input of Fair Wear and its suppliers, and it has conducted a gender analysis at one of its Chinese factories. All in all, Fair Wear would like to commend Iriedaily for its efforts and how it has continued its due diligence strategy despite the challenges of COVID-19.

## **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.	85%	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.	4	4	0

**Comment:** Iriedaily sources in Portugal (seven suppliers, 14 subcontractors) and in China (five suppliers, four subcontractors). At 11 suppliers, the leverage of the brand exceeds 10%. This allows Iriedaily to influence working conditions more effectively.

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.	6%	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	o

**Comment:** Iriedaily sources from five production locations in Portugal where it buys less than two per cent of its total FOB. These locations account for six per cent of the FOB over 2021.

Iriedaily has a strategy to reduce its tail-end as much as possible. Most of the current tail-end suppliers are there for a specific reason. For example, the factory makes a particular product such as socks, or it is a long-term relationship that the brand does not want to end from its side to keep supporting the factory.

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.	92%	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.	4	4	0

**Comment:** Maintaining long-term and stable relationships with suppliers is an essential aspect of Iriedaily's approach to business. With suppliers contributing to 92% of its FOB, Iriedaily has had a business relationship for more than five years. A relationship has existed for over ten years with key suppliers where the brand buys close to 50% of its total production volume.

At the same time, Iriedaily is implementing a strategy to source less from China. As a result, it will need to start sourcing at other factories. Iriedaily is carefully selecting potential new suppliers and has made a list of demands and requirements; the aim is to find long-term suppliers that will support Iriedaily with its sustainability vision.

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.	Yes	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.	2	2	0

**Comment:** In 2021, three new production locations were added, two in China and one in Portugal. One location was not continued because of excessive overtime found during a pre-audit that was conducted as part of the onboarding process of the new location.

All locations signed and returned the questionnaire with the Fair Wear Code of Labour practises. The new location in Portugal has also been visited by the CSR manager.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.4 Member company conducts human rights due diligence at all (new) production locations before placing orders.	Advanced	Due diligence helps to identify, prevent and mitigate potential human rights problems at suppliers.	Documentation may include pre-audits, existing audits, other types of risk assessments.	4	4	0

**Comment:** The company's strategy and philosophy are to keep its supply chain as compact as possible and not enter new sourcing countries. The brand currently works in two production countries, China and Portugal. For China, the brand has identified excessive overtime, forced labour, lack of freedom of association and subcontracting as risks. For Portugal, the main risks identified are stagnation in wage levels and subcontracting.

As part of its new strategy, Iriedaily aims to decrease its production volume in China and is searching for new sourcing partners in other production countries. Also, Iriedaily has started investigating risks related to factories deeper in the chain. For example, it has investigated the origin of the organic cotton used for its garments.

Iriedaily was in regular contact with its agents and factories to learn about the issues they faced regarding COVID-19. The agents are seen as the brand's eyes on the ground and provide support in fulfilling its due diligence. In addition, the brand conducted a COVID-19 supplier survey twice. The supplier survey contained questions about the overall situation in the country, the impact of COVID-19 on production and the health and safety measures in the factory. COVID-19 did not impact 2021 as severely as 2020. There were no national/regional lockdown periods in China or Portugal, factories had implemented concrete protective health measures, and most workers were vaccinated. As main risks, Iriedaily identified: production and delivery issues and health and safety at the workplace.

**Recommendation:** Fair Wear recommends Iriedaily to continue with its risk assessment for new countries and to include the risk assessment in a Responsible Business Conduct (RBC) policy.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.5 Production location compliance with Code of Labour Practices is evaluated in a systematic manner.	Yes, and leads to production decisions	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.	2	2	0

**Comment:** Iriedaily has a database system which provides the brand with an overview of the supply chain, each product is linked to the respective production location (both suppliers and subcontractors). This is regularly updated to ensure all subcontractors are also included. After all purchase orders for a collection are placed, the CSR manager creates an overview of the supply chain used for that season.

All suppliers and subcontractors are evaluated based on their compliance with each labour standard of the CoLP, which is based on the information captured in the audit reports. In the case of Portugal where audit reports are not available, factory visit reports and checks by the brand's / agents' staff and general risk levels in the country are used for supplier evaluation. The evaluation also includes several other points like transparency, years of cooperation, leverage and environmental certifications such as GOTS. The computation of scores for each of the categories is mostly perception based except for wages and working hours where the brand has defined indexes to guide the scoring for those categories.

Iriedaily actively uses the results of the evaluation to inform business decisions. The brand consciously moves more orders to suppliers with better ratings, especially when a style at the supplier has reduced due to lower sales demand. Moreover, the evaluation of the suppliers is displayed in the office so that all staff is aware of it. In Portugal, the agent is aware of the ratings as well and gives advice to the brand when deciding whether to continue or not with a supplier. In China, the evaluations are shared with the main suppliers.

In 2021, Iriedaily participated in a project of the organisation Better Buying and invited its suppliers to rate Iriedaily's purchasing practices. The ratings were positive which demonstrates the active dialogue there is between Iriedaily and its suppliers and how Iriedaily responds to issues such as production delays.

Regarding COVID-19, from the conversations with suppliers, Iriedaily learned that many faced production and delivery issues. Iriedaily responded to that by being flexible and adapting its delivery dates. Iriedaily also offered a financial guarantee so that factories could purchase raw material at an earlier stage to deal with the increasing raw material prices.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.6 The member company's production planning systems support reasonable working hours.	Strong, integrated systems in place.	Member company production planning systems can have a significant impact on the levels of excessive overtime at production locations.	Documentation of robust planning systems.	4	4	O

**Comment:** Iriedaily releases two collections annually- Spring/Summer and Fall/Winter.

To factor in the lead times for procurement of the fabric and other materials that can play an important role, besides shipping times and the capacities of the suppliers, the purchasing manager and CSR Manager jointly analyse the pre-orders and then define a delivery schedule with the supplier. A complete timesheet is discussed with the supplier and fabrics are pre-booked before orders are placed. The production phase for each of the collections is roughly four months.

From its Portuguese suppliers, the brand knows what is the weekly maximum capacity per location. For its Chinese suppliers, the brand has less detailed information and mainly relies on the indication of the supplier itself. The brand cross-checks the capacities given with historic data because Iriedaily finds that suppliers tend to provide an overestimate and then end up subcontracting or are overstretched. If the pre-order volume exceeds the capacity of the supplier, orders are passed on to other suppliers that still have the capacity needed.

In 2021, Iriedaily participated in a training organised by Fair Wear to improve the company's go-to-market plan. As part of that, the brand also discussed its go-to-market plan with suppliers. In the new go-to-market plan, each step of the production process including sales and marketing of the product is defined with a deadline. Deadlines for each step in the process are updated by means of a traffic light system so that everyone is aware. When a certain step in the process is delayed, staff is requested to find alternative ways to either meet the deadline or work around it. The main deadlines for stages in the production process as kept as they are to avoid putting pressure on the production time of the factory.

In 2021, many of Iriedaily's suppliers faced delivery delays because of extended lead times for raw materials and transportation issues. Iriedaily was in constant contact with all suppliers to learn how it could support. The brand has been flexible with its delivery deadlines and allowed for individual shipments of products.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.7 Degree to which member company mitigates root causes of excessive overtime.	Intermediate efforts	Some production delays are outside of the control of member companies; however there are a number of steps that can be taken to address production delays without resorting to excessive overtime.	Evidence of how member responds to excessive overtime and strategies that help reduce the risk of excessive overtime, such as: root cause analysis, reports, correspondence with factories, etc.	3	6	0

**Comment:** In 2021, Iriedaily received several audit findings related to excessive overtime. During the brand performance check, Iriedaily showed it has actively followed up with all suppliers and verified with the Fair Wear local team if the situation was improved according to the factory.

As excessive overtime is a common issue in China, Iriedaily has executed thorough root-cause analyses with its Chinese partners. Iriedaily sent out a questionnaire to all suppliers and discussed the results. The main causes identified were; the increase in local demand, COVID-19 and low wages.

**Recommendation:** Iriedaily is recommended to measure whether the root cause analyses and discussions about excessive overtime with suppliers lead to a reduction of the excessive overtime hours.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.8 Member company can demonstrate the link between its buying prices and wage levels in production locations.	Intermediate	Understanding the labour component of buying prices is an essential first step for member companies towards ensuring the payment of minimum wages – and towards the implementation of living wages.	Interviews with production staff, documents related to member's pricing policy and system, buying contracts.	2	4	0

**Comment:** Iriedaily has worked closely with its main supplier in China and key suppliers in Portugal to understand the Labour Minutes for the styles made at those locations.

For China, the brand has discussed the importance of open costing and transparency with all suppliers. So far, the suppliers are unwilling to share open costing with the brand. Hence, Iriedaily uses the open costing knowledge of its main supplier as a reference (where workers generally have higher wages compared to other locations) when working on price development with other suppliers. That apart, the brand currently adds two per cent above the price developed as a factor to contribute to increasing wage levels. The sourcing team is informed that they cannot discuss price reductions unless it is linked to reductions in process/ fabric etc. The brand is aware of minimum wages for its supplier locations and uses audit reports to ensure minimum wages are paid to workers at all production locations. In 2021, Iriedaily's main supplier was part of the pilot to test the Fair Wear Fairprice app. Iriedaily aims to further implement the app in 2022.

For locations in Portugal, the member discussed increasing prices with the suppliers based on Labour Minute Value calculation. The factories are generally unwilling to start working with the Fairprice app as it would mean they need to change their way of operating. Wage levels in Portugal have improved over recent years and Iriedaily actively checks with its suppliers whether the increase in wages, energy and raw material prices is also included in its purchasing prices, including for carry-over styles.

**Recommendation:** Iriedaily could provide suppliers who don't use open costing, training on product costing and how to quote prices including (direct and indirect) labour costs. FairPrice product owners are available to conduct such training in all Fair Wear production countries.

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.	Yes	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.	0	0	-2

**Comment:** In 2021, Iriedaily received two audit findings related to wage issues. The findings were related to entitled leaves and piece-rate workers. Iriedaily could show it had actively followed up on both findings and that they were remediated.

In 2021, there were no national/regional lockdown periods in Portugal where factories had to close. Nevertheless, Iriedaily actively followed up with its suppliers to ensure wages were paid and did not fall below 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.	No	Late payments to suppliers can have a negative impact on production locations and their ability to pay workers on time. Most garment workers have minimal savings, and even a brief delay in payments can cause serious problems.	Based on a complaint or audit report; review of production location and member company financial documents.	0	0	-1

**Comment:** There was no evidence of late payments.

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.	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	Evidence of how payment below living wage was addressed, such as: Internal policy and strategy documents, reports, correspondence with factories, etc	4	6	0

**Comment:** Iriedaily has focused its efforts on living wages in its production locations in China. The brand has discussed the topic with all its suppliers.

With its main supplier, Iriedaily has been able to create a sufficient level of transparency to determine the real wages of each worker for every production phase; this is based on wage slips and attendance lists. Iriedaily produces 46 % of its production in China at this supplier, has considerable leverage, and another FW member is also sourcing there. Iriedaily chose this location to implement living wages (see also 1.13 and 1.14). In 2021, the Fairprice app was tested at this location; Iriedaily aims to further implement the app in 2022.

Iriedaily also discusses the topic of wages with its suppliers in Portugal. The brand closely monitors wages and wage increases. For example, the brand follows the national legal minimum wage increases and payslips are checked during factory visits.

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.	Advanced	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.	6	6	0

Comment: Since 2020, Iriedaily finances wage increases at its main supplier in China together with another Fair Wear member sourcing there. Iriedaily has chosen the Asian Floor wage benchmark as the target wage. For its share of the production, Iriedaily now finances the wage gap for all workers at the factory. To trace its contribution back, Iriedaily's CSR manager does the calculation at the end of each season, and then the share is paid out to the workers. Iriedaily has worked out a strategy to raise its consumer prices to finance the wage increase.

In 2021, Iriedaily further explored the possibility of increasing wages at its other factories in China. However, none of the current factories in China was a good partner to start such a project because of changes in location, low leverage, and a planned exit strategy.

Part of Iriedaily's strategy to pay for fair wages at its production sites is to source from countries where the legal minimum wage is closer to a living wage and where the right of collective bargaining and freedom of association are better protected. Nearly 50 % of Iriedaily production volume comes from Portugal.

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.	46%	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.	4	6	0

**Comment:** As mentioned under 1.13, Iriedaily is paying its share of contribution towards living wage at its main supplier in China, which represents 46 % of its FOB in China. To ensure that each worker receives the calculated share, Iriedaily requests signatures from the workers.

**Recommendation:** Iriedaily is encouraged to roll out its approach to other suppliers.

#### **Purchasing Practices**

**Possible Points: 52** 

**Earned Points: 42** 

# 2. Monitoring and Remediation

Basic measurements	Result	Comments
% of production volume where an audit took place.	55%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.	45%	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.	Yes	
Requirement(s) for next performance check		
Total monitoring threshold:	90%	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:** The CSR manager is designated to follow up on problems identified by the monitoring system and works closely with the CEO. CAP follow-up is supported by other staff members, including the production, distribution and design departments. In Portugal, the brand works closely with its agent to monitor the situation at its Portuguese production locations.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.2 Quality of own auditing system meets FWF standards.	Member makes use of FWF audits and/or external audits only	In case Fair Wear teams cannot be used, the member companies' own auditing system must ensure sufficient quality in order for Fair Wear to approve the auditing system.	Information on audit methodology.	N/A	0	-1

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.3 Audit Report and Corrective Action Plan (CAP) findings are shared with factory and worker representation where applicable. Improvement timelines are established in a timely manner.	Yes	2 part indicator: Fair Wear audit reports were shared and discussed with suppliers within two months of audit receipt AND a reasonable time frame was specified for resolving findings.	Corrective Action Plans, emails; findings of followup audits; brand representative present during audit exit meeting, etc.	2	2	-1

**Comment:** In 2021, Iriedaily commissioned four Fair Wear audits in China and the audit results were shared timely with the factory management. One audit was conducted as part of the pre-assessment for a new supplier, and one audit was conducted at the end of 2021. Iriedaily received the report of the latter in 2022.

The other two audits were conducted at Iriedaily's main supplier and one of its subcontractors. Worker representation was included in the main supplier's audit process, and the results were shared with the worker representation.

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.	Advanced	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.	8	8	-2

**Comment:** As a standard practice, when Iriedaily receives an audit report, it is promptly reviewed and then shared with the supplier or in case of indirect relation with the agent. Audit findings and timelines for remediation are agreed upon together with the factory. Iriedaily requires immediate action from its factories in case there are occupational health and safety violations. Follow-up of CAPs is mainly done by email and discussed by the CEO or CSR manager with factory management during factory visits. If needed, the CSR manager checks with the Fair Wear local team whether improvements have been made.

During the brand performance check, Iriedialy could show it had actively followed findings including more complex findings such as working hours and living wages.

For Portugal, factories are visited regularly by the brand's agent. During those visits, the health and safety checklists are used. In 2021, Iriedialy also visited its suppliers in Portugal, used the health and safety checklist and discussed labour conditions.

**Recommendation:** Fair Wear recommends Iriedaily to gradually ensure all factories establish independent worker representation and involve these representatives in monitoring and remediation of findings.

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

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:** Iriedaily has collected audit reports from other sources such as GOTS and BSCI. Iriedaily has not used the reports yet for its supplier monitoring and risk assessment but is planning to do so moving forward.

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.7 Compliance with FWF risk policies.	Advanced result on all 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.	6	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	Policies are not relevant to the company's supply chain			N/A	6	-2
Other risks specific to the member's supply chain are addressed by its monitoring system	Advanced			6	6	-2

#### **Comment:** Other risks:

Iriedaily sources from two production countries, Portugal and China.

For Portugal, Iriedaily has identified stagnating wage levels as the main risk. To remediate, the brand proactively follows up on annual wage increases in Portugal and incorporates them into its buying prices. In 2021, the brand closely followed up on the minimum wage increases with its suppliers. Another risk identified for Portugal is that of unauthorised subcontracting. By mapping its supply chain per season and with the support of regular visits by its Portuguese agent (see 5.1) Iriedaily prevents this risk.

For China, the brand has identified as main risks: low wages, over-time, Freedom of Association and forced labour. With the implementation of living wages at its main production location in China (see 1.13 & 1.14), Iriedaily has started to work on the remediation of low wages in China. Through a root-cause analysis at its factories, regular audits and systematic CAP follow-up, the brand aims to decrease excessive overtime at its factories. To remediate the risk of forced labour in China, Iriedaily does a risk assessment for its suppliers further down the supply chain and it has participated in research on forced labour. Moreover, the brand is aiming to decrease its production volume in China.

At its main supplier in China, Iriedaily conducted a gender analysis. For three years, Iriedaily documented the gender composition per job category and how much each worker earned. From the analysis, it could be concluded that women generally earned more for the same job as men and there were more men in higher-paid positions.

#### COVID-19

Iriedaily supported its factories during COVID-19 by being flexible with its delivery terms, providing financial guarantees and incorporating additional costs in its buying prices. Moreover, Iriedaily asked its agents to check on the health and safety measures implemented by the factories.

**Recommendation:** Fair Wear recommends that Iriedaily continues with its gender analysis, applying it to other factories.

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.	Active cooperation	Cooperation between customers increases leverage and chances of successful outcomes. Cooperation also reduces the chances of a factory having to conduct multiple Corrective Action Plans about the same issue with multiple customers.	Shared CAPs, evidence of cooperation with other customers.	2	2	-1

**Comment:** Iriedaily has several shared suppliers with other Fair Wear members. The brand actively collaborates with the other members in resolving corrective actions at shared suppliers. Moreover, the company implemented a living wage project at one supplier together with one Fair Wear member.

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.	100%	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.	2	2	0

#### Member undertakes additional activities to monitor suppliers.: Yes (1)

Comment: Iriedaily sources in Portugal and ensures:

- 1. Up-to-date information on the labour conditions in the location by regular visits (including subcontractors);
- 2. All production locations are informed of Fair Wear membership and return the completed CoLP questionnaire before production orders are placed;
- 3. Awareness of specific risks identified by Fair Wear;
- 4. That Fair Wear Worker Information Sheet is posted at all production locations.

In 2021, Iriedaily visited most of its factories in Portugal and discussed several topics related to social compliance and the environmental goals of the company. During the visits, payslips have been checked and a health and safety check was conducted.

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

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.13 Questionnaire is sent and information is collected from licensees.	No licensees	Fair Wear believes it is important for member companies to know if the licensee is committed to the implementation of the same labour standards and has a monitoring system in place.	Questionnaires are on file. Contracts with licensees.	N/A	1	0

# **Monitoring and Remediation**

**Possible Points: 26** 

**Earned Points: 24** 

## 3. Complaints Handling

Basic measurements	Result	Comments
Number of worker complaints received since last check.	2	At this point, FWF considers a high number of complaints as a positive indicator, as it shows that workers are aware of and making use of the complaints system.
Number of worker complaints in process of being resolved.	0	
Number of worker complaints resolved since last check.	2	

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.1 A specific employee has been designated to address worker complaints.	Yes	Followup is a serious part of 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:** The CSR manager is responsible for Fair Wear membership and works closely with the CEO to address worker complaints.

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: Iriedaily ensures that the Worker Information Sheet (WIS), including contact information of the local complaints handler of Fair Wear, is posted in factories in a location that is accessible to all workers. The brand checks this during factory visits, takes photos of the same, and documents it in the visit report and the supplier folder. In 2021, Iriedaily has visited 15 of its suppliers in Portugal. During the visits, the CSR manager has explained Fair Wear and the WIS to the workers. For China, Iriedaily's agents have followed up on the WIS.

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.	77%	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 workermanagement 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.	6	6	0

**Comment:** Irriedaily conducted Fair Wear WEP basic training at five production locations in China in the last three years, of which one WEP training was conducted in 2021. Together, it counts for 77 % of the brand's production volume. During the training, the Worker Information Cards were distributed among the workers.

With the other brand sourcing, Iriedaily has followed up on the training by discussing the outcomes. For example, workers had expressed the need for a second worker representation, and the factory has implemented internal training on grievance mechanisms in the factory.

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.	Yes	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.	3	6	-2

**Comment:** In 2021, Iriedaily received two worker complaints from the same factory in China. This is a factory where more Fair Wear members are sourcing, and Iriedaily was not in the lead for following up on the complaint.

One complaint was related to excessive overtime, and the other complaint was related to factory management and subcontracting. For both complaints, Iriedaily ensured it was up to date on the progress made with the complaint. Unfortunately, both complaints could not be fully resolved, but both complaints have been closed. In one case, the complaint handler could not get in touch with the complainant, and in the other case, the complainant could not provide further evidence to support his/her claim.

**Recommendation:** It is recommended to uncover the root causes of complaints and prevent them from recurring. When appropriate, the investigation includes incidents at other factories.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.5 Cooperation with other customers in addressing worker complaints at shared suppliers.	Active cooperation	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.	2	2	0

**Comment:** Generally, Iriedaily cooperates with other member brands when sourcing at the same factory. As mentioned, Iriedaily was not in the lead to follow up on the worker complaints it received last year. Nevertheless, it remained current on the situation and in contact with the other brands.

## **Complaints Handling**

**Possible Points: 17** 

**Earned Points: 14** 

## 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:** Iriedaily has weekly team meetings during which the topic of CSR is constantly discussed. On top of that, new staff receive Fair Wear and sustainability training from the CSR manager. In 2021, the CSR manager focused more on updating the sales department about CSR activities.

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:** Irriedaily organises a yearly presentation about CSR, Fair Wear membership, and information about production sites is also shared with all staff members. That apart, meetings with specific teams in direct contact with suppliers are organised to discuss supplier evaluations (every season) and other important issues, for example, lead times.

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 + actively support COLP	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.	2	2	0

Comment: Iriedaily works with three agents in China and one in Portugal and invested time and effort in discussions and training these agents on Fair Wear requirements and CoLP. The health&safety checklists are used by the agents when they visit the factories, and the agents also check whether the WIS is still posted. Before agents visit the factories, the CSR manager usually plans a meeting to discuss specific topics that need attention. In 2021, the brand was in constant contact with the agents about the situation in the factories and country. The CSR manager shared advice on health and safety measures to prevent COVID-19 and received feedback from its agents that factories had implemented all safety measures.

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.

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

# **Training and Capacity Building**

**Possible Points: 5** 

**Earned Points: 5** 

## **5. Information Management**

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
5.1 Level of effort to identify all production locations.	Advanced	Any improvements to supply chains require 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.	6	6	-2

Comment: Iriedaily has extensively talked with all suppliers about subcontracting and when and how this is allowed. Generally, factories can only add subcontractors once social compliance has been evaluated and the factory is visited by staff. Furthermore, to ensure subcontracting does not happen, Iriedialy calculated the capacity needed for its orders and compares that with the production capacity. When Iriedaily foresees that the factory does not have enough capacity, alternative options are discussed. As an additional measure, the CSR manager collects the information about the factories and subcontractors used per style. This information is also used for its webshop where customers can see which factories are used for a specific product.

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:** All staff in direct contact with suppliers are involved in Fair Wear requirements and social compliance. Staff that visit factories use the Fair Wear H&S safety checklist and reports of visits are made and shared. That apart, the CSR manager updates the design department about the latest CAP issues so that they know how factories are performing.

# **Information Management**

**Possible Points: 7** 

**Earned Points: 7** 

## 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: Iriedaily communicates about Fair Wear on its website and social media. The website has several pages dedicated to showing the environmental and social steps the brand is taking.

Iriedaily's brand stores have an information corner with material about Fair Wear membership, and staff is regularly trained to respond to questions. In 2021. Iriedaily created videos about the production locations in Portugal and the partnership with Iriedaily. The videos are also published on the website.

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:** On Iriedaily's website, the brand's Brand Performance Check results and social reports can be found. Furthermore, the company is transparent about its production locations. On the webshop, consumers can see per product what location produced it. Through the Fair Wear transparency tool, Iriedaily has disclosed 100 % of its factories, both on the Fair Wear website and with other Fair Wear members in FairForce.

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:** Iriedaily publishes the Social Report on its website. Moreover, Iriedaily shares parts of its social reports through Instagram posts.

# **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:** Fair Wear membership is integrated into the daily way of working at Iriedaily. As such, membership is regularly evaluated during team meetings and between the CEO and CSR manager. Iriedaily expects that the shift to the risk-based approach and implementation of the new brand performance check will lead to many changes in the upcoming year and the evaluation of membership will become even more important.

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

#### **Evaluation**

**Possible Points: 2** 

**Earned Points: 2** 

#### **Recommendations to Fair Wear**

Iriedaily recommends Fair Wear to ensure all brand pages on its website are up-to-date with the latest social reports.

Moreover, it recommends that Fair Wear creates more practical guidelines when it requires new activities from its members such as creating a responsible business conduct policy. To end, Iriedaily recommends that Fair Wear keeps offering possibilities for smaller brands to join the membership.

# **Scoring Overview**

Category	Earned	Possible
Purchasing Practices	42	52
Monitoring and Remediation	24	26
Complaints Handling	14	17
Training and Capacity Building	5	5
Information Management	7	7
Transparency	6	6
Evaluation	2	2
Totals:	100	115

Benchmarking Score (earned points divided by possible points)

87

Performance Benchmarking Category

Leader

## **Brand Performance Check details**

Date of Brand Performance Check:

13-06-2022

Conducted by:

**Annemiek Smits**