



Brand Performance Check

JBC n.v.

Publication date: August 2022

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

About the Brand Performance Check

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

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

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

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

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

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

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

Brand Performance Check Overview

JBC n.v.

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

Member company information	
Headquarters:	Houthalen , Belgium
Member since:	2015-03-31
Product types:	Garments, clothing, fashion apparel
Production in countries where Fair Wear is active:	Bangladesh, China, India, Tunisia, Turkey
Production in other countries:	Morocco, Netherlands, Pakistan
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	65%
Benchmarking score	45
Category	Needs Improvement

Summary:

JBC has shown insufficient progress in performance indicators. The brand is placed in the 'Needs Improvement'-category because JBC scored insufficient on several repeated non-compliance indicators and achieved a score of 45 points where 50 points are required. The member monitored 65% of its suppliers.

Corona Addendum:

At the start of 2021, lockdowns in Europe negatively impacted the sales of JBC. The brand ensured it was in constant dialogue about production planning and regularly checked in with the factories to ask about the situation. It took measures to ensure that it provided suppliers sufficient time to produce the garments.

JBC actively collects audit reports from its suppliers and tracks the progress of suppliers. Its local Chinese team supports the headquarters in monitoring suppliers. In 2021, the local team was actively involved in checking Occupational Health and Safety and potential wage issues.

However, JBC should ensure its risk assessment is an ongoing and continuous process where it links country, product, and supply chain risks to its suppliers. Furthermore, JBC is heavily reliant on collecting external audit reports, which are often not of sufficient quality to inform the brand of issues at suppliers. Therefore, the brand needs to invest in the quality of its monitoring system by ensuring that it uses tools that sufficiently and adequately identify issues.

The CSR manager left the company in 2021 while conducting human rights due diligence was heavily reliant on her. The brand also had difficulty accessing communication as it went through the CSR manager. Therefore, the brand could only show a basic level of follow-up on CAPs during the performance check. JBC should ensure its follow-up goes beyond tracking progress by merely asking for another audit report. It should include an active engagement, verification and support towards the supplier to remediate issues. JBC should ensure it has adequate resources to monitor, track and follow up on issues at its suppliers. It should also ensure that important CSR information is well documented, made accessible and shared with staff outside the CSR department. The brand should also make sure it follows up on the requirements provided in this performance check related to wages and the risk of forced labour.

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.	81%	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: At 81% of its production volume, JBC has more than 10% leverage. At 11 suppliers, the brand had 50% or more leverage. In 2021, JBC further consolidated its supplier base and reduced the number of suppliers from 88 to 61.

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.	22%	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.	0	4	0

Comment: In 2021, 22% of JBC's production came from factories where JBC buys less than 2% of its total FOB.

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.2 Percentage of production volume from production locations where a business relationship has existed for at least five years.	74%	Stable business relationships support most aspects of the Code of Labour Practices, and give production locations a reason to invest in improving working conditions.	Supplier information provided by member company.	3	4	0

Comment: JBC has long-term relationships with a significant part of its suppliers. Compared to 2020, the percentage increased from 50% to 74% which was also a result of the consolidation process.

Recommendation: Fair Wear recommends JBC to maintain stable business relationships with suppliers. Long term relationships support most aspects of the Code of Labour Practices, and give factories a reason to invest in improving working conditions. It is advised to describe policies regarding maintaining long term business relationships in a sourcing strategy that is agreed upon with top management/sourcing staff.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.3 All (new) production locations are required to sign and return the questionnaire with the Code of Labour Practices before first bulk orders are placed.	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: JBC started relationships with one new supplier. The Fair Wear Code of Labour Practices was signed before placing bulk orders.

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

Comment: In 2021, JBC collected country-specific information and risks through its local team in China and some other sources (such as Fair Wear and the CSR Risk Checker) for Turkey, Pakistan and Italy. In China, its local team checked whether suppliers were paying legal minimum wages throughout the pandemic. At the same time, the local team also checked for Occupational Health and Safety (OHS) issues. This procedure was not expanded to other countries.

The brand asked suppliers about any COVID-19 related issues and also sent out a COVID-19 questionnaire again. However, during the performance check, the brand could not show how it connected country and COVID-19 specific risks to its suppliers (besides China). For example, wage information was not cross-checked for months that the factory had to close during lockdowns or power cuts. Furthermore, JBC mainly focused on collecting recent audit reports as part of the regular two-year cycle. A large part of these audit reports did not meet Fair Wear's quality standards which means a significant risk that severe human rights issues were not identified. The brand did not prioritize initiating audits or making use of other monitoring tools based on high risks in its supply chain, except for China. JBC did not always have a recent audit report from suppliers where JBC has a high leverage.

JBC was informed by Fair Wear that forced labour is a high risk when products are made in China. The brand checked with suppliers whether forced labour was used in cotton production which suppliers denied. The brand did not conduct further due diligence in identifying potential risks and issues of forced labour at its Chinese suppliers. The brand did not participate in a screening offered by a third party to identify supplier specific risks.

JBC started relationships with one Bangladeshi supplier. The brand visited the factory and collected a recent audit report. However, the report was not of sufficient quality to be counted towards the monitoring threshold. Furthermore, the member checked the status of the factory under the Bangladesh Accord prior to sourcing from the factory. The supplier could show there were only several issues that still had to be corrected.

Requirement: Fair Wear requires JBC to actively assess risks of forced labour in China related to the production of cotton used in its products.

Recommendation: Fair Wear strongly recommends JBC to ensure a consistent approach to human rights due diligence in all the countries it sources from. The brand should prioritize actions based on its risk assessment. Furthermore, JBC should ensure that human rights risks are properly identified and assessed through its monitoring tools such as audits. For example, we recommend the member to thoroughly check whether wages are paid when factories have to close due to lockdowns or power cuts.

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: The CSR manager has developed a system to track a production location's progress on compliance with the Code of Labour Practices, using Fair Wear and external audit data. This vendor rating is discussed with specific buyers responsible for a specific production location. The vendor rating is also discussed with the suppliers and it is made clear upfront that a lack of transparency and unwillingness to cooperate on improvements will result in decreasing orders.

In 2021, the brand did not cancel any orders and was in dialogue with its suppliers on production planning throughout the lockdowns in the market countries at the start of 2021.

JBC reduced a significant portion of its supply chain by moving from 88 to 61 suppliers. The member had small production volumes at these suppliers.

Recommendation: JBC is encouraged to make more explicit how social compliance in the supplier rating system in which quality, relationship, price, and planning are assessed is weighted and how compliance with the Fair Wear Code of Labour Practices leads to production decisions.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.6 The member company's production planning systems support reasonable working hours.	Strong, integrated systems in place.	Member company production planning systems can have a significant impact on the levels of excessive overtime at production locations.	Documentation of robust planning systems.	4	4	0

Comment: JBC has a detailed go-to-market plan to plan production together with the factories. When forecasting, the brand and supplier agree on the total available capacity per month that can be booked by JBC. This is done using a combination of the factory indicating its maximum capacity and an assessment of JBC staff done during production location visit(s). The brand is not aware of the factory's total production capacity per month. An online system within JBC then shows the amount of production that can take place and 'blocks' orders that exceed this limit from being entered. The planning starts from the intended delivery date, indicating what deadlines the company has to meet internally to allow enough time for production. This internal planning also includes possible factories where production will take place, so suppliers can be informed. The brand then splits up the forecast in smaller orders which it places throughout the season, but at least six months in advance. In addition, the company produces "never out of stock" items as much as possible in lower production seasons. JBC has two main seasons (spring/summer and autumn/winter).

During the COVID-19 pandemic, the brand was in regular dialogue with its suppliers on production planning. Lockdowns and power cuts sometimes delayed production. The brand decided to shorten the production process by having samples approved by its China office instead of by its headquarter. Furthermore, JBC also accepted delays and extended lead times in case this was necessary.

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

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

Comment: External audit reports from its Bangladeshi, Turkish and Chinese suppliers regularly showed that these factories had excessive overtime. In case an audit report showed excessive overtime, the brand did follow up as part of the CAP and checked its own production planning. However, no root cause analyses were conducted at its suppliers and no measures were taken to mitigate these root causes.

Requirement: JBC should conduct root cause analyses of excessive overtime at its suppliers to investigate which steps can be most effective to reduce overtime.

Recommendation: Fair Wear recommends JBC to assess the root causes of excessive overtime, especially at its main suppliers and/or where it has a high leverage.

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: JBC uses a top-down pricing model. Per item, it defines the maximum price it would like to pay. The brand then enters into a dialogue with suppliers about the price and makes changes to the garment in case suppliers cannot meet the price levels.

In 2021, the member made a good step by introducing open costing sheets to a few suppliers to break down the costs. These sheets include fabric costs, overhead and Cut, Make, Trim (CMT). JBC plans to roll out these sheets to more suppliers. The brand did not yet detail it to the level of labour minutes. Neither does it estimate the labour costs levels based on available wage data.

Therefore, the brand receives an intermediate score but is still required to show progress. To maintain the score for next year, the brand should continue its progress and ensure it gets insight into the level of labour minute costs through estimates or through the Fair Price app.

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

Recommendation: Fair Wear recommends JBC to roll out the open costing sheet to all suppliers. Furthermore, the member should expand its knowledge of cost break downs of all product groups. A next step would be to calculate the labour minute costs of its products to be able to calculate the exact costs of labour and link this to their own buying prices. We recommend using the FairPrice app. The FairPrice app also enables suppliers to include any COVID-19 related costs. JBC could consider offering training by a local representative on FairPrice to its suppliers. Such training is available in all Fair Wear 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.	No	If a supplier fails to pay minimum wage or minimum wage payments cannot be verified, Fair Wear member companies are expected to hold management of the supplier accountable for respecting local labour law. Payment below minimum wage must be remediated urgently.	Complaint reports, CAPs, additional emails, Fair Wear Audit Reports or additional monitoring visits by a Fair Wear auditor, or other documents that show minimum wage issue is reported/resolved.	-2	0	-2

Comment: In the previous performance check report, JBC had received a requirement to follow up on non-payment of legal minimum wages at a particular supplier. However, in 2020, the brand had already decided to stop relationships with this factory due to business reasons.

There were no findings of non-payment of legal minimum wages in other audit reports. However, with a monitoring percentage of 65% and a limited number of valid 2021 audit reports, there remains a significant risk that there were minimum wage issues at suppliers.

During the COVID-19 pandemic in 2021, JBC's China team actively monitored whether Chinese factories had to close due to lockdowns and power cuts. Headquarter staff would then enter into a dialogue with the supplier on the payment of wages. Although the brand checked these factories on wage payments through on-site visits and document checks, the brand could not show it had checked the wage payments in the months the factories were temporarily closed.

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

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

Recommendation: Fair Wear recommends JBC to ensure it actively and consistently monitors its suppliers, especially in case of high risks such as the non-payment of legal minimum wages. It could expand its practice of checking documentation to other countries. Furthermore, the brand could improve its procedure by visiting factories and interviewing workers to prevent receiving falsified records.

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: During the performance check, JBC could show that it had paid its suppliers on-time in 2021.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.11 Degree to which member company assesses and responds to root causes for wages that are lower than living wages in production locations.	Insufficient	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach	Evidence of how payment below living wage was addressed, such as: Internal policy and strategy documents, reports, correspondence with factories, etc	0	6	0

Comment: JBC collects information about wage levels from suppliers. However, in 2021, the brand did not take steps in discussing living wages with its suppliers and assess root causes of non-payment of living wages.

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

Recommendation: Fair Wear encourages JBC to discuss with suppliers about different strategies to work towards higher wages. It is advised to start with suppliers where the member is responsible for a large percentage of production and long term business relationship.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.12 Percentage of production volume from factories owned by the member company (bonus indicator).	None	Owning a supplier increases the accountability and reduces the risk of unexpected CoLP violations. Given these advantages, this is a bonus indicator. Extra points are possible, but the indicator will not negatively affect an member company's score.	Supplier information provided by member company.	N/A	2	0

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

Comment: JBC focused on ensuring payment of legal minimum wage in all their production facilities and therefore did not determine a target wage or a finance strategy.

Recommendation: To support companies in analysing the wage gap, Fair Wear has developed a calculation model that estimates the effect on FOB and retail prices under different pricing models.

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

Comment: Based on available information, none of JBC's production locations pay living wage.

Recommendation: We encourage JBC to show that discussions and plans for wage increases have resulted in the payment of a target wage.

Purchasing Practices

Possible Points: 52

Earned Points: 15

2. Monitoring and Remediation

Basic measurements	Result	Comments
% of production volume where an audit took place.	65%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.	0%	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.	Standard monitoring below 80%	Monitoring threshold below 80%.
Requirement(s) for next performance check	During factory visits, labour conditions and the use of subcontractors must be discussed, outcomes of the discussion must be documented, and the Fair Wear health and safety check-list must be completed and filed for Fair Wear to assess during a Brand Performance Check. JBC can collect existing audit reports from the production sites in order to ensure most up to date information on working conditions.	
Total monitoring threshold:	65%	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 responsible for following up on problems identified by the monitoring system.

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.3 Audit Report and Corrective Action Plan (CAP) findings are shared with factory and worker representation where applicable. Improvement timelines are established in a timely manner.	No Corrective Action Plans were active during the previous year	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.	N/A	2	-1

Comment: In 2021, no Fair Wear audits were organised at active suppliers of JBC.

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.	Basic	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.	4	8	-2

Comment: In 2021, JBC collected SMETA, BSCI and TUV Rheinland-audit reports. Most reports only contained Occupational Health and Safety issues and in several cases findings of excessive overtime hours.

In China, the brand followed up on the risk of non-payment of legal minimum wage due to the lockdown by checking wage information of suppliers, but did not find any issues. JBC made use of its local team to visit the factories and checked OHS issues and documents.

During the performance check, the brand could show it engaged with suppliers, but the engagement was often limited to asking about the COVID-19 situation and tracking progress by asking recent audit reports. Furthermore, the quality of the audit reports and CAPs were often not meeting Fair Wear's standards for audit reports. An important factor for this is the limited available information and lack of findings on (living) wages, excessive working hours, freedom of association and gender-based violence. This limits the brands' ability to be more actively involved in the identification, prevention and remediation of these complex topics.

Despite the fact that the brand made good steps in consolidating its supply chain, the CSR manager (with support of the local China team) was the main responsible for following up on the human rights due diligence of JBC and Mayerline combined. This meant that the CSR manager was responsible for the monitoring and remediation of issues at about 100 first-tier suppliers, which was not sufficient resources to properly conduct human rights due diligence. When the CSR Manager then left at the start of 2022, most of the communication and follow-up had been done via e-mail, which was only partially accessible for the brand. The member also did not have an overview in place of all the CAPs and issues to track and monitor progress in a systematic way.

Recommendation: Fair Wear strongly recommends JBC to improve its monitoring system of suppliers by investing in audits or other monitoring tools of higher quality. Especially at its most important suppliers, the brand should ensure that it gets a good insight into the labour rights issues. Furthermore, the brand could link the country risks more actively to potential issues at suppliers to prevent and remediate such issues.

Fair Wear strongly recommends to ensure that the size of the supply chain and the available resources of JBC to actively follow up on CAP-issues are coinciding. Possible solutions could be to decrease the number of suppliers or increase the amount of resources needed for active follow up. Furthermore, we recommend the member to create an overview to keep track and monitor progress of suppliers in a systematic way.

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: JBC collects external audit reports. Despite the fact that most audit reports contain a CAP, the brand could often not show it had assessed the quality and had actively followed up on the CAPs.

Recommendation: Fair Wear recommends JBC to assess the quality of the external audit report and immediately discuss with the supplier what information is missing and how to collect that information.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.7 Compliance with FWF risk policies.	Average score depending on the number of applicable policies and results	Aside from regular monitoring and remediation requirements under 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.	1	6	-2
Compliance with FWF enhanced monitoring programme Bangladesh	Intermediate			3	6	-2
Compliance with FWF Myanmar policy	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on abrasive blasting	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on risks related to Turkish garment factories employing Syrian refugees	Intermediate			3	6	-2
Other risks specific to the member's supply chain are addressed by its monitoring system	Insufficient			-2	6	-2

Comment: Bangladesh:

JBC is member of the Bangladesh Accord. When selecting a new supplier, the brand also checks whether the factory already falls under the Accord. The brand collects the Accord reports and also engages with the Accord on non-compliances of factories. Almost all of its Bangladeshi suppliers are compliant with the Accord requirements. In 2019, one of its suppliers had refused access to the Accord-inspectors of which the brand was informed early 2021. During the performance check, the brand could show exchanges had taken place with the purchasing department, the Accord and between the supplier and the Accord (CAP updates). Furthermore, parts of the CAP and an exchange with the factory in December 2021 were available. However, the brand could not show it (pro)-actively and immediately followed up after the exchange with the Accord. JBC also did not invest in training on Gender-Based Violence for its suppliers while this is a common and high risk in Bangladesh.

Turkey:

In 2021, JBC collected information on the risks of Syrian refugees at Turkish suppliers. It informed its purchasing department again of these risks and asked them to be mindful of potential subcontracting. With support of its agents, the brand actively checks for subcontracting. However, the brand only made limited use of audit reports of sufficient quality to check for Syrian refugees.

Other:

During the COVID-19 pandemic, the brand was in regular dialogue with its suppliers on potential issues. JBC engaged suppliers on risks such as 'loss of jobs' and 'non-payment of legal minimum wage'. In China, the brand also asked for wage documents, although the did brand could not show it thoroughly checked wages of the time periods that the factory was temporarily closed. Neither did the brand have such a system in place for the other countries. JBC did regularly check OHS issues through the Fair Wear OHS-sheet when the Chinese local team was on-site and/or by asking for external audit reports. The member did not check to what extent worker representatives were involved in handling COVID-19 measures in the factory.

JBC is aware of the risk of forced labour in China. The company discussed the topic with suppliers, The brand did not conduct further due diligence in identifying potential risks and issues of forced labour at its Chinese suppliers. The brand did not participate in a screening offered by a third party to identify supplier specific risks.

Requirement: JBC needs to mitigate the risks and issues of forced labour at its Chinese suppliers and in cotton production.

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

Recommendation: Fair Wear recommends JBC to take a more pro-active stance in case Bangladeshi suppliers do not meet the requirements of the Accord and ensure that it documents and can share these response within the organisation. Furthermore, we recommend JBC to engage its Turkish suppliers on Syrian refugees again, inform them of the policy on Syrian workers and ensure that suppliers are monitored by monitoring tools of good quality. Bangladeshi and Turkish suppliers should be trained on Gender-Based Violence and workers' rights for Syrian refugees. We also recommend JBC to make use of third party screening to identify forced labour in its supply chain.

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

Comment: JBC shares several factories with Fair Wear members. At least at two production locations where JBC has a significant production volume, a Fair Wear member is active and disclosed the production location. No collaboration between the members was established. However, these production locations are part of the tail end of these brands where lighter monitoring requirements apply and brands can decide not to be involved in CAP follow up.

Recommendation: Fair Wear recommends JBC to actively check in the Fair Wear internal data management system whether other Fair Wear members disclosed their relationship with one of JBC's suppliers. JBC could collaborate more actively with other Fair Wear members to increase leverage.

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.	No production in low-risk countries	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.	N/A	2	0

Member undertakes additional activities to monitor suppliers.: N/A (N/A)

Comment: JBC stopped relationships with a Dutch supplier in 2020. Therefore, there are no more suppliers from low-risk countries and this indicator is rated N/A.

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

Comment: JBC does not meet the minimum requirements for the monitoring threshold and therefore this indicator does not apply.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.11 Questionnaire is sent and information is collected from external brands resold by the member company.	Yes, and member has collected necessary information	Fair Wear believes it is important for affiliates that have a retail/wholesale arm to at least know if the brands they resell are members of Fair Wear or a similar organisation, and in which countries those brands produce goods.	Questionnaires are on file.	2	2	0

Comment: JBC sells a significant number of external brands in its shops. The member sends the questionnaire to these brands and collects the necessary information.

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).	0%	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.	0	3	0

Comment: None of the brands listed were a member of Fair Wear or FLA in 2021.

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

Comment: JBC does not have any licensees.

Monitoring and Remediation

Possible Points: 24

Earned Points: 10

3. Complaints Handling

Basic measurements	Result	Comments
Number of worker complaints received since last check.	0	At this point, FWF considers a high number of complaints as a positive indicator, as it shows that workers are aware of and making use of the complaints system.
Number of worker complaints in process of being resolved.	0	
Number of worker complaints resolved since last check.	1	

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: JBC's CSR Manager is responsible for dealing with complaints from workers or their representatives within the supply chain of JBC.

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: All production locations have posted Worker Information Sheets, and sharing of a picture of a posted Worker Information Sheet is part of the onboarding process of new suppliers.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.3 Degree to which member company has actively raised awareness of the FWF CoLP and complaints hotline.	All production in low-risk countries/training not possible	After informing workers and management of the Fair Wear CoLP and the complaints hotline, additional awareness raising and training is needed to ensure sustainable improvements and structural worker-management dialogue.	Training reports, Fair Wear's data on factories enrolled in the WEP basic module. For alternative training activities: curriculum, training content, participation and outcomes.	N/A	6	0

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.4 All complaints received from production location workers are addressed in accordance with the FWF Complaints Procedure.	No complaints received	Providing access to remedy when problems arise is a key element of responsible supply chain management. Member company involvement is often essential to resolving issues.	Documentation that member company has completed all required steps in the complaints handling process.	N/A	6	-2

Comment: In 2020, JBC received one complaint that was closed in 2021 after the complainant had left the factory during the COVID-19 pandemic.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.5 Cooperation with other customers in addressing worker complaints at shared suppliers.	No complaints or cooperation not possible / necessary	Because most production locations supply several customers with products, involvement of other customers by the Fair Wear member company can be critical in resolving a complaint at a supplier.	Documentation of joint efforts, e.g. emails, sharing of complaint data, etc.	N/A	2	0

Complaints Handling

Possible Points: 3

Earned Points: 3

4. Training and Capacity Building

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.1 All staff at member company are made aware of FWF membership.	Yes	Preventing and remediating problems often requires the involvement of many different departments; making all staff aware of Fair Wear membership requirements helps to support cross-departmental collaboration when needed.	Emails, trainings, presentation, newsletters, etc.	1	1	0

Comment: JBC's CSR manager gives presentations internally on a regular basis. The company regularly has deep dives with its staff members. CSR was also a topic during the deep dives in 2021.

There are also presentations for new employees on the topic of CSR and Fair Wear. The CSR Manager also regularly provides a CSR update during monthly staff meetings and is involved in the onboarding of new employees. A large sign at the company entrance shows that the brand is a Fair Wear member.

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: The CSR manager has bi-weekly meetings with the buying department and informs them of Fair Wear requirements.

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

Comment: JBC works with several agents. These agents are all informed of Fair Wear membership. Several of these agents have a more active role to support implementation of the Fair Wear Code of Labour Practices by, for example, following-up on CAPs.

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

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.4 Factory participation in training programmes that support transformative processes related to human rights.	All production in low-risk countries/training not possible	Complex human rights issues such as freedom of association or gender-based violence require more in-depth trainings that support factory-level transformative processes. Fair Wear has developed several modules, however, other (member-led) programmes may also count.	Training reports, Fair Wear's data on factories enrolled in training programmes. For alternative training activities: curriculum, training content, participation and outcomes.	N/A	6	0

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

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

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

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

Training and Capacity Building

Possible Points: 5

Earned Points: 4

5. Information Management

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
5.1 Level of effort to identify all production locations.	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: JBC has a policy in place that does not allow for subcontracting. It agrees with its agents beforehand on which suppliers can be used for production. Furthermore, the brand collects information on subcontractors through the Fair Wear-questionnaire and audit reports. In China, Bangladesh and Turkey, it makes use of local teams or the agent to do in-line inspections in factories while production is taking place. The brand made a start at identifying subcontractors that provide supporting processes, such as printing and/or embroidery.

Recommendation: Fair Wear recommends JBC to take additional measures to check for subcontracting in countries where it does not have a local team in place. Such measures could be:

- 1) Conducting a product risk assessment;
- 2) Gaining more in-sight into production planning of a supplier, including peak season;
- 3) On-site verification by independent third parties and/or worker interviews.

Furthermore, to maintain an advanced score, the member should identify and integrate non-CMT subcontractors in its monitoring system.

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.	No	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: Communication with suppliers about audit results and CAP follow up was done through email exchange with the CSR manager. When the CSR manager left, JBC could no longer access most of its communication around audit reports, especially concerning factories outside China. This showed that this information was not shared properly with other relevant staff throughout the year.

Requirement: 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.

Recommendation: Fair Wear strongly recommends JBC to ensure that communication about human rights due diligence and CAP follow up or stored and saved in a way that is easily accessible to other relevant staff and actively shared with them as well.

Information Management

Possible Points: 7

Earned Points: 5

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: JBC communicates about Fair Wear on its website, magazine and additionally on the doors of its headquarters, email signatures of employees and in their stores.

The communication on its own website is limited to the Fair Wear logo. More information about Fair Wear membership can be found on a related blog.

Recommendation: Fair Wear recommends JBC to more clearly communicate on its website that it is a Fair Wear member and which steps it takes to improve working conditions of garment workers that produce its clothes.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.2 Member company engages in advanced reporting activities.	Published Brand Performance Checks, audit reports, and/or other efforts lead to increased transparency.	Good reporting by members helps to ensure the transparency of Fair Wear's work and shares best practices with the industry.	Member company publishes one or more of the following on their website: Brand Performance Check, Audit Reports, Supplier List.	1	2	0

Comment: JBC disclosed 97% of the production volume of its suppliers on Fair Wear's website and to other Fair Wear members in our internal data management system.

JBC did not publish last years' brand performance check report on its own website. Therefore, a full score could not be awarded.

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: JBC published its sustainability report on its website which also contains a section on its social impact.

Transparency

Possible Points: 6

Earned Points: 5

7. Evaluation

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

Comment: JBC's top management regularly reviews Fair Wear membership, social compliance and its efforts related to both.

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.	49%	In each Brand Performance Check report, Fair Wear may include requirements for changes to management practices. Progress on achieving these requirements is an important part of Fair Wear membership and its process approach.	Member company should show documentation related to the specific requirements made in the previous Brand Performance Check.	2	4	-2

Comment: In the last performance check, the brand had received requirements on indicators 1.8, 1.9, 2.4 and 2.7.

The brand made some progress on these indicators.

1.8: JBC introduced an open costing sheet although it did not yet enable the brand to link prices and wages through estimates or labour minute costing.

1.9: JBC stopped sourcing from a supplier that had not paid legal minimum wages and therefore, could no longer follow up on the finding. However, the brand should have ensured that its system of checking the payment of legal minimum wages through on-site visits and documents checking also verified wage payments during factory closures.

2.4: The brand showed that it had followed up on CAPs on a basic level.

2.7: The member showed that it had taken several measures to prevent the loss of jobs or lowering of wages at suppliers due to COVID-19. However, JBC received another insufficient score for this part of the indicator due to fact it had not sufficiently followed up on the risk of forced labour in China.

Three out of four indicators that had received a requirement in 2021, again received an insufficient score and a requirement in 2022. Considering the fact that the brand had made a slight progress in all these areas, the brand is awarded 2 points.

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

Evaluation

Possible Points: 6

Earned Points: 4

Recommendations to Fair Wear

JBC recommends Fair Wear to:

- link the Open Apparel Registry with Fair Wear factory number and ID
- to provide support for HRDD policy implementation (OECD vs Fair Wear)
- to provide support by connecting JBC with other brands on the topic of Living Wages.

Scoring Overview

Category	Earned	Possible
Purchasing Practices	15	52
Monitoring and Remediation	10	24
Complaints Handling	3	3
Training and Capacity Building	4	5
Information Management	5	7
Transparency	5	6
Evaluation	4	6
Totals:	46	103

Benchmarking Score (earned points divided by possible points)

45

Performance Benchmarking Category

Needs Improvement

Brand Performance Check details

Date of Brand Performance Check:

12-07-2022

Conducted by:

Wilco van Bokhorst

Interviews with:

Catherine Louies: CSR advisor

Lisa Hillen: Supply Chain Manager

Michiel van der Meer: Head of Buying and Sourcing

Cherry Ding: Manager China office

Ann Claes: Owner and Chief Buying Officer