



BAPTIST
WORLD
AID

tearfund

2022 ETHICAL FASHION REPORT

TECHNICAL APPENDIX



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Appendix 1: Ethical Fashion Brand Scores

BRAND	COMPANY	SCORE
Active Steps	WM Ritchie	2*
Adidas	Adidas	58
Alan Pinkus	WM Ritchie	2*
Allbirds	Allbirds	27*
Alpha	Accent Group	16
Altra	VF Corp	54
ASICS	ASICS	31
Birkenstock	Birkenstock	7*
Blundstone	Blundstone	18*
Bogs	Weyco Group	7*
Cat Footwear	Wolverine Worldwide	14*
Chaco	Wolverine Worldwide	14*
Cinori	Munro Footwear Group	18
Clarks	Brand Collective (Footwear)	22
coast	Boohoo	24
Cobra Golf	Puma	58
Colorado	Munro Footwear Group	18
Converse	Nike	50
Deuce	Overland	13
Diana Ferrari	Munro Footwear Group	18
Django & Juliette	Munro Footwear Group	18
Easy Steps	WM Ritchie	2*
Florsheim	Weyco Group	7*

FXD	Globe International Limited	10
Gamins	Munro Footwear Group	18
Globe	Globe International Limited	10
Grosby	Brand Collective (Footwear)	22
Hannahs	Ngahuia Group	0*
Harley-Davidson Footwear	Wolverine Worldwide	14*
Hush Puppies	Brand Collective (Footwear)	22
HyTest	Wolverine Worldwide	14*
I Love Billy	Munro Footwear Group	18
ITNO	Accent Group	16
Jane Debster	WM Ritchie	2*
John Bull	Blundstone	18*
Jordan	Nike	50
Julius Marlow	Brand Collective (Footwear)	22
Keds	Wolverine Worldwide	14*
Mathers	Munro Footwear Group	18
Merchant 1948	Overland	13
Merrell	Wolverine Worldwide	14*
Mi Piaci	Overland	13
Midas	Munro Footwear Group	18
Mollini	Munro Footwear Group	18

Mountfords	Munro Footwear Group	18
Napapiriji	VF Corp	54
New Balance	New Balance	52
Nike	Nike	50
Nina	WM Ritchie	2*
Nine West	Nine West	0*
Novo Shoes	Novo Shoes Pty Ltd	0*
Number One Shoes	Ngahuia Group	0*
Nunn Bush	Weyco Group	7*
Onitsuka Tiger	ASICS	31
Papillio	Birkenstock	7*
Pink Inc	WM Ritchie	2*
Puma	Puma	58
R.M. Williams	R.M. Williams	33
Rafters	Weyco Group	7*
Ravella	WM Ritchie	2*
Rubi	Cotton On Group	42
Sandler	WM Ritchie	2*
Saucony	Wolverine Worldwide	14*
Shoes & Sox	Brand Collective (Footwear)	22
Silent D	Munro Footwear Group	18
Soft Style	Wolverine Worldwide	14*
Sperry	Wolverine Worldwide	14*
Stacy Adams	Weyco Group	7*

* Depicts companies assessed on public information only.

Stride Rite Children's Group	Wolverine Worldwide	14*
Style Tread	Munro Footwear Group	18
Styling Services	Munro Footwear Group	18
Supersoft by Diana Ferrari	Munro Footwear Group	18
The North Face	VF Corp	54
Timberland	VF Corp	54
TOMS	Toms	15*
Top End	Munro Footwear Group	18
Umi	Weyco Group	7*
VANS	VF Corp	54
Volley	Brand Collective (Footwear)	22
Warrior	New Balance	52
Wide Steps	WM Ritchie	2*
Williams	Munro Footwear Group	18
Windsor Smith	Windsor Smith	0*
Wittner	Wittner	18
Wolverine	Wolverine Worldwide	14*
Ziera	Munro Footwear Group	18

* Depicts companies assessed on public information only.

Appendix 2. Ethical Fashion Survey Data

A. Policies & Governance

COMPANY	FINAL SCORE	POLICIES & GOVERNANCE – SCORE OUT OF 6				
		1.1 Does the company have a Code of Conduct for suppliers?	1.2 Does the Code apply to multiple levels of the supply chain including the raw materials level?	1.3 Is the code included in supplier contracts?	2.1 Does the company have a designated senior officer responsible for implementation, and a board committee/member tasked with oversight of its supply chain policies that address human rights and environmental sustainability?	2. ACCOUNTABILITY: Company identifies clear points of accountability for human rights and environmental sustainability at the management and board level.
Accent Group	16	4	Partial	Partial	Yes	Yes
Adidas	58	6	Yes	Partial	Yes	Yes
Allbirds	27	5	Yes	No	Yes	Partial
ASICS	31	6	Yes	Partial	Yes	Yes
Birkenstock	7	3	Partial	Partial	Yes	No
Blundstone	18	3	Partial	No	Partial	Partial
Brand Collective (Footwear)	22	6	Yes	Partial	Yes	Yes
Cotton On Group	42	4	Partial	Partial	Yes	Yes
Globe International Limited	10	4	Partial	No	Yes	Yes
Munro Footwear Group	18	4	Partial	No	Yes	Yes
New Balance	52	6	Yes	Yes	Yes	Yes
Ngahua Group	0	0	No	No	No	No
Nike	50	6	Yes	Partial	Yes	Yes
Nine West	0	0	No	No	No	No

Novo Shoes Pty Ltd	0	0	No	No	No	No
Overland	13	4	Yes	No	Yes	No
Puma	58	6	Yes	Partial	Yes	Yes
R.M. Williams	33	4	Partial	Partial	Yes	Yes
Toms	15	4	Yes	No	Yes	No
VF Corp	54	6	Yes	Yes	Yes	Yes
Weyco Group	7	2	Partial	No	No	No
Windsor Smith	0	0	No	No	No	No
Wittner	18	3	Partial	No	Yes	No
WM Ritchie	2	2	Partial	No	No	Partial
Wolverine Worldwide	14	2	Partial	No	No	Partial

B. Tracing & Transparency - Final Stage Production

COMPANY	FINAL SCORE	TRACING & RISK – SCORE OUT OF 5						
		3. TRACING & TRANSPARENCY: Company traces and is transparent about its suppliers at all levels of its supply chain.			4. RISK: Company assesses and discloses material human rights and environmental risks throughout its supply chain.			
		3.1 Approximately what percentage of facilities (factories, mills, farms, etc.) has the company traced?	3.4 Is the company involved in a tracing project to identify the location of unknown producers?	3.5 Is there a public list of facilities?	3.6 In addition to names and addresses, does the company also publish detailed indicators about each facility?	4.1 Has the company conducted a labour rights risk assessment of its supply chain to improve its labour rights management system?	4.2 Has the company undertaken an assessment of its environmental impacts and risks throughout its supply chain?	
Accent Group	16	5	76-99%	Yes	No	No	Yes	No
Adidas	58	12	100%	N/A	Yes	Yes	Yes	Yes
Allbirds	27	7	100%	N/A	No	No	Partial	Yes
ASICS	31	7	100%	N/A	Partial	Partial	Yes	Yes
Birkenstock	7	3	76-99%	No	Partial	No	No	No
Blundstone	18	5	76-99%	No	No	No	Partial	Partial
Brand Collective (Footwear)	22	6	100%	N/A	Yes	Yes	Partial	No
Cotton On Group	42	9	100%	N/A	Yes	Partial	Partial	Yes
Globe International Limited	10	3	76-99%	Yes	No	No	Partial	No
Munro Footwear Group	18	4	76-99%	Yes	No	No	Partial	Partial
New Balance	52	12	100%	N/A	Yes	Yes	Yes	Yes
Ngahua Group	0	0	0%	No	No	No	No	No
Nike	50	9	100%	N/A	Yes	Yes	Yes	Yes
Nine West	0	0	0%	No	No	No	No	No
Novo Shoes Pty Ltd	0	0	0%	No	No	No	No	No
Overland	13	1	26-50%	No	No	No	No	No

Puma	58	12	100%	N/A	Yes	Yes	Partial	Yes
R.M. Williams	33	10	100%	N/A	Partial	Partial	Yes	Partial
Toms	15	3	51-75%	No	Partial	Partial	Partial	No
VF Corp	54	13	100%	N/A	Yes	Yes	Yes	Yes
Weyco Group	7	2	51-75%	No	No	No	No	No
Windsor Smith	0	0	0%	No	No	No	No	No
Wittner	18	4	76-99%	No	No	No	No	No
WM Ritchie	2	<1	1-25%	No	No	No	No	No
Wolverine Worldwide	14	3	51-75%	No	No	No	No	No

B. Tracing & Transparency - Inputs Production

COMPANY	FINAL SCORE	TRACING & RISK – SCORE OUT OF 15							3. TRACING & TRANSPARENCY: Company traces and is transparent about its suppliers at all levels of its supply chain.	4. RISK: Company assesses and discloses material human rights and environmental risks throughout its supply chain.
		TRACING & RISK – SCORE OUT OF 15								
		3.1 Approximately what percentage of facilities (factories, mills, farms, etc.) has the company traced?	3.4 Is the company involved in a tracing project to identify the location of unknown producers?	3.5 Is there a public list of facilities?	3.6 In addition to names and addresses, does the company also publish detailed indicators about each facility?	4.1 Has the company conducted a labour rights risk assessment of its supply chain to improve its labour rights management system?	4.2 Has the company undertaken an assessment of its environmental impacts and risks throughout its supply chain?			
Accent Group	16	5	1-25%	Yes	No	No	Yes	No		
Adidas	58	12	76-99%	Partial	Partial	Partial	Yes	Yes		
Allbirds	27	7	1-25%	Partial	No	No	No	Yes		
ASICS	31	7	1-25%	No	No	No	Partial	Yes		
Birkenstock	7	3	1-25%	No	No	No	No	No		
Blundstone	18	5	76-99%	Partial	Partial	No	Partial	Partial		
Brand Collective (Footwear)	22	6	1-25%	Partial	Yes	Yes	Partial	Partial		
Cotton On Group	42	9	76-99%	Yes	No	No	Partial	Partial		
Globe International Limited	10	3	0%	No	No	No	Partial	No		
Munro Footwear Group	18	4	1-25%	Yes	No	No	Partial	No		
New Balance	52	12	76-99%	Yes	Partial	Partial	Yes	Yes		
Ngahua Group	0	0	0%	No	No	No	No	No		
Nike	50	9	1-25%	No	Yes	Yes	Partial	Yes		
Nine West	0	0	0%	No	No	No	No	No		
Novo Shoes Pty Ltd	0	0	0%	No	No	No	No	No		
Overland	13	1	1-25%	Partial	Partial	No	Partial	Partial		

Puma	58	12	76-99%	Partial	Partial	Partial	Partial	Yes
R.M. Williams	33	10	76-99%	Yes	Yes	Partial	Partial	Yes
Toms	15	3	1-25%	Partial	No	No	Partial	Partial
VF Corp	54	13	76-99%	Yes	Partial	Partial	Yes	Yes
Weyco Group	7	2	1-25%	Partial	Partial	No	Partial	Partial
Windsor Smith	0	0	0%	No	No	No	No	No
Wittner	18	4	76-99%	Partial	No	No	Partial	Partial
WM Ritchie	2	<1	0%	No	No	No	No	No
Wolverine Worldwide	14	3	76-99%	Partial	No	No	Partial	Partial

B. Tracing & Transparency - Raw Materials Production

COMPANY	FINAL SCORE	TRACING & RISK – SCORE OUT OF 15							3. TRACING & TRANSPARENCY: Company traces and is transparent about its suppliers at all levels of its supply chain.	4. RISK: Company assesses and discloses material human rights and environmental risks throughout its supply chain.
		TRACING & RISK – SCORE OUT OF 15								
		3.1 Approximately what percentage of facilities (factories, mills, farms, etc.) has the company traced?	3.4 Is the company involved in a tracing project to identify the location of unknown producers?	3.5 Is there a public list of facilities?	3.6 In addition to names and addresses, does the company also publish detailed indicators about each facility?	4.1 Has the company conducted a labour rights risk assessment of its supply chain to improve its labour rights management system?	4.2 Has the company undertaken an assessment of its environmental impacts and risks throughout its supply chain?			
Accent Group	16	5	1-25%	Yes	No	No	Yes	Partial		
Adidas	58	12	100%	N/A	No	No	Yes	Yes		
Allbirds	27	7	100%	N/A	Partial	No	No	Yes		
ASICS	31	7	26-50%	Yes	No	No	Partial	Yes		
Birkenstock	7	3	1-25%	No	No	No	No	No		
Blundstone	18	5	0%	No	No	No	No	No		
Brand Collective (Footwear)	22	6	0%	No	No	No	No	No		
Cotton On Group	42	9	1-25%	Yes	No	No	Yes	Yes		
Globe International Limited	10	3	0%	No	No	No	Partial	No		
Munro Footwear Group	18	4	0%	No	No	No	Partial	No		
New Balance	52	12	76-99%	Yes	No	No	Partial	Partial		
Ngahua Group	0	0	0%	No	No	No	No	No		
Nike	50	9	76-99%	Yes	No	No	Yes	Yes		
Nine West	0	0	0%	No	No	No	No	No		
Novo Shoes Pty Ltd	0	0	0%	No	No	No	No	No		
Overland	13	1	0%	No	No	No	No	No		

Puma	58	12	76-99%	Yes	Partial	Partial	Yes	Yes
R.M. Williams	33	10	1-25%	Partial	No	No	No	No
Toms	15	3	0%	No	No	No	No	Partial
VF Corp	54	13	76-99%	Yes	Partial	Partial	Yes	Yes
Weyco Group	7	2	0%	No	No	No	No	No
Windsor Smith	0	0	0%	No	No	No	No	No
Wittner	18	4	0%	No	No	No	No	No
WM Ritchie	2	<1	0%	No	No	No	No	No
Wolverine Worldwide	14	3	0%	No	No	No	Partial	No

C. Supplier Relationships & Human Rights Monitoring - Final Stage Production

COMPANY	FINAL SCORE	SUPPLIER RELATIONSHIPS & HUMAN RIGHTS MONITORING – SCORE OUT OF 34														
		5. RESPONSIBLE PURCHASING: Company adopts fair and responsible policies and behaviours for supplier orders and contracts.					6. SUPPLIER RELATIONSHIPS: Company establishes strong supplier relationships to incentivise good labour rights and environmental practices.			7. FORCED LABOUR, CHILD LABOUR AND HUMAN TRAFFICKING: Company assesses and discloses material human rights and environmental risks throughout its supply chain.						
		5.1 Does the company have a policy on responsible purchasing practices when engaging with suppliers, including a strategy for implementation of the policy?	5.2 Does the company track data related to responsible purchasing practices including percentage of orders paid on time and percentage of retrospective changes made to orders or payment terms?	6.1 Does the company invest in training suppliers and factory managers to increase awareness of labour rights and health and safety risks?	6.2 Does the company actively improve and leverage relationships with suppliers, through industry collaboration and/or multi-stakeholder initiatives (MSIs)?	6.3 Does the company have a preferred supplier program by which suppliers are incentivised for strong labour rights and/or environmental sustainability records?	7.1 Has the company produced a Modern Slavery Statement?	7.2 Does the company ensure that there is no unauthorised subcontracting and that all authorised subcontracted production adheres to code standards?	7.3 Does the company track suppliers' use of vulnerable workers? Incl. migrant, temporary/contract and female workers	7.4 Are suppliers monitored for their use of labour brokers and recruitment fees?						
Accent Group	16	4	No	No	No	Partial	No	Yes	No	Partial	No					
Adidas	58	16	Yes	No	Yes	Yes	Partial	Yes	Partial	Partial	Partial					
Allbirds	27	3	No	No	No	Partial	No	No	Partial	No	No					
ASICS	31	6	No	No	Partial	Yes	Partial	Yes	No	Partial	Partial					
ASOS	41	10	Partial	Partial	Partial	Yes	No	Yes	Partial	Partial	Partial					
Birkenstock	7	1	No	No	No	No	No	No	No	No	No					
Blundstone	18	4	No	No	No	No	No	Yes	No	No	No					
Brand Collective (Footwear)	22	4	No	No	Partial	No	No	Yes	No	Partial	No					
Cotton On Group	42	15	Yes	No	Yes	Yes	Partial	Partial	Partial	Partial	Partial					

Globe International Limited	10	2	No	No	No	No	No	Yes	Partial	Partial	Partial					
Munro Footwear Group	18	5	No	Partial	Partial	Partial	No	Yes	Partial	Partial	Partial					
New Balance	52	19	Yes	Partial	Yes	Yes	Partial	Yes	Yes	Yes	Yes					
Ngahua Group	0	0	No	No	No	No	No	No	No	No	No					
Nike	50	14	Yes	No	Partial	Yes	Yes	Yes	Yes	Yes	Yes					
Nine West	0	0	No	No	No	No	No	No	No	No	No					
Novo Shoes Pty Ltd	0	0	No	No	No	No	No	No	No	No	No					
Overland	13	1	Partial	No	No	Partial	Partial	No	No	No	No					
Puma	58	18	Yes	Partial	Yes	Yes	Yes	Yes	Yes	Yes	Yes					
R.M. Williams	33	7	No	No	No	Partial	No	Yes	Partial	Partial	No					
Toms	15	5	Yes	No	Partial	Partial	No	Partial	Partial	No	No					
VF Corp	54	13	Partial	No	Partial	Yes	Partial	Yes	Yes	Yes	Yes					
Weyco Group	7	<1	No	No	No	No	No	No	No	No	No					
Windsor Smith	0	0	No	No	No	No	No	No	No	No	No					
Wittner	18	2	No	No	No	No	No	No	Partial	No	No					
WM Ritchie	2	<1	No	No	No	No	No	No	No	No	No					
Wolverine Worldwide	14	2	No	No	Partial	No	No	No	No	No	No					

C. Supplier Relationships & Human Rights Monitoring - Inputs Production

COMPANY	FINAL SCORE	SUPPLIER RELATIONSHIPS & HUMAN RIGHTS MONITORING - SCORE OUT OF 34						
		6.1 Does the company invest in training suppliers and factory managers to increase awareness of labour rights and health and safety risks?	6.2 Does the company actively improve and leverage relationships with suppliers, through industry collaboration and/or multi-stakeholder initiatives (MSIs)?	6.3 Does the company have a preferred supplier program by which suppliers are incentivised for strong labour rights and/or environmental sustainability records?	7.2 Does the company ensure that there is no unauthorised subcontracting and that all authorised subcontracted production adheres to code standards?	7.3 Does the company track suppliers' use of vulnerable workers? Incl. migrant, temporary/contract and female workers	7.4 Are suppliers monitored for their use of labour brokers and recruitment fees?	6. SUPPLIER RELATIONSHIPS: Company establishes strong supplier relationships to incentivise good labour rights and environmental practices.
Accent Group	16	4	No	No	No	No	No	No
Adidas	58	16	Partial	Yes	No	Partial	Partial	Partial
Allbirds	27	3	No	No	No	No	No	No
ASICS	31	6	No	No	No	No	No	No
Birkenstock	7	1	No	No	No	No	No	No
Blundstone	18	4	Partial	Partial	Yes	Partial	No	Partial
Brand Collective (Footwear)	22	4	Partial	Partial	Yes	Partial	Partial	Partial
Cotton On Group	42	15	No	Yes	No	Partial	Partial	Partial
Globe International Limited	10	2	No	No	No	No	No	No
Munro Footwear Group	18	5	No	No	No	No	No	No
New Balance	52	19	Partial	Partial	Partial	No	Partial	Partial

Ngahuaia Group	0	0	No	No	No	No	No	No
Nike	50	14	No	Partial	Partial	Partial	Partial	Partial
Nine West	0	0	No	No	No	No	No	No
Novo Shoes Pty Ltd	0	0	No	No	No	No	No	No
Overland	13	1	Partial	Partial	Yes	Partial	No	Partial
Puma	58	18	Partial	Partial	No	Partial	Partial	Partial
R.M. Williams	33	7	Partial	Partial	Partial	Partial	No	Partial
Toms	15	5	No	Partial	No	No	No	No
VF Corp	54	13	Partial	Yes	Partial	Partial	Partial	Partial
Weyco Group	7	<1	Partial	Partial	Yes	Partial	No	Partial
Windsor Smith	0	0	No	No	No	No	No	No
Wittner	18	2	Partial	Partial	Partial	Partial	No	Partial
WM Ritchie	2	<1	No	No	No	No	No	No
Wolverine Worldwide	14	2	Partial	Partial	Yes	Partial	No	Partial

C. Supplier Relationships & Human Rights Monitoring - Raw Materials Production

COMPANY	FINAL SCORE	SUPPLIER RELATIONSHIPS & HUMAN RIGHTS MONITORING - SCORE OUT OF 34							
		6.1 Does the company invest in training suppliers and factory managers to increase awareness of labour rights and health and safety risks?	6.2 Does the company actively improve and leverage relationships with suppliers, through industry collaboration and/or multi-stakeholder initiatives (MSIs)?	6.3 Does the company have a preferred supplier program by which suppliers are incentivised for strong labour rights and/or environmental sustainability records?	7.2 Does the company ensure that there is no unauthorised subcontracting and that all authorised subcontracted production adheres to code standards?	7.3 Does the company track suppliers' use of vulnerable workers? Incl. migrant, temporary/contract and female workers	7.4 Are suppliers monitored for their use of labour brokers and recruitment fees?	6. SUPPLIER RELATIONSHIPS: Company establishes strong supplier relationships to incentivise good labour rights and environmental practices.	7. FORCED LABOUR, CHILD LABOUR AND HUMAN TRAFFICKING: Company assesses and discloses material human rights and environmental risks throughout its supply chain.
Accent Group	16	4	Partial	Yes	Yes	Yes	Yes	Yes	Partial
Adidas	58	16	Partial	Yes	Yes	Yes	Yes	Yes	Partial
Allbirds	27	3	No	Yes	Yes	No	No	No	No
ASICS	31	6	Partial	Yes	Partial	Partial	Partial	Partial	Partial
Birkenstock	7	1	No	No	No	No	No	No	No
Blundstone	18	4	No	No	No	No	No	No	No
Brand Collective (Footwear)	22	4	No	No	No	No	No	No	No
Cotton On Group	42	15	Partial	Yes	Yes	Yes	Yes	Yes	Partial
Globe International Limited	10	2	No	No	No	No	No	No	No
Munro Footwear Group	18	5	No	No	No	No	No	No	No
New Balance	52	19	Partial	Yes	Yes	Yes	Yes	Yes	Partial

Ngahuaia Group	0	0	No	No	No	No	No	No	No
Nike	50	14	Partial	Yes	Yes	Yes	Yes	Yes	Partial
Nine West	0	0	No	No	No	No	No	No	No
Novo Shoes Pty Ltd	0	0	No	No	No	No	No	No	No
Overland	13	1	No	No	No	No	No	No	No
Oxford	22	3	No	No	No	No	No	No	No
Puma	58	18	Partial	Yes	Yes	Yes	Yes	Yes	Partial
R.M. Williams	33	7	No	No	No	No	No	No	No
Toms	15	5	No	No	No	No	No	No	No
VF Corp	54	13	No	Yes	Yes	No	No	No	No
Weyco Group	7	<1	No	No	No	No	No	No	No
Windsor Smith	0	0	No	No	No	No	No	No	No
Wittner	18	2	No	No	No	No	No	No	No
WM Ritchie	2	<1	No	No	No	No	No	No	No
Wolverine Worldwide	14	2	No	No	No	No	No	No	No

C. Supplier Relationships & Human Rights Monitoring - Final Stage Production Cont.

COMPANY	SUPPLIER RELATIONSHIPS & HUMAN RIGHTS MONITORING - SCORE OUT OF 94									
	FINAL SCORE	81 Does the company have a policy addressing gender inequality in the supply chain, including a strategy to address discrimination and rights violations faced by women in the apparel industry?		91 What percentage of facilities are monitored over a 2-year period by trained social auditors or through worker-led processes?		92 What percentage of facilities are monitored with unannounced audits over a 2-year period?		93 What percentage of facilities are known to have other worker voice processes such as anonymous worker surveys or off-site worker interviews in place?		94 Does the company publicly report on the results of supplier monitoring and evaluation procedures?
		8. GENDER INEQUALITY: Company identifies and works to address gender inequality and discrimination throughout its supply chain.			9. MONITORING: Company regularly monitors labour rights standards throughout its supply chain including implementation of its code of conduct and supply chain policies.			10. REMEDY AND CORRECTIVE ACTION: Company ensures all labour rights issues and violations are remediated in the best interests of the impacted workers and their communities.		
Accent Group	16	4	No	100%	0%	0%	No	0%	No	
Adidas	58	16	Yes	51-75%	26-50%	26-50%	Yes	1-25%	Partial	
Allbirds	27	3	No	100%	0%	0%	No	0%	No	
ASICS	31	6	No	76-99%	0%	0%	Yes	0%	No	
Birkenstock	7	1	No	0%	0%	0%	No	0%	Partial	
Blundstone	18	4	No	76-99%	0%	0%	No	0%	No	
Brand Collective (Footwear)	22	4	Partial	76-99%	0%	0%	No	0%	No	
Cotton On Group	42	15	Yes	100%	1-25%	1-25%	Yes	26-50%	Yes	
Globe International Limited	10	2	No	1-25%	0%	0%	No	0%	No	

Munro Footwear Group	18	5	No	51-75%	1-25%	0%	Partial	0%	No
New Balance	52	19	Yes	100%	0%	1-25%	Yes	51-75%	Yes
Ngahua Group	0	0	No	0%	0%	0%	No	0%	No
Nike	50	14	Yes	100%	1-25%	1-25%	Yes	0%	Partial
Nine West	0	0	No	0%	0%	0%	No	0%	No
Novo Shoes Pty Ltd	0	0	No	0%	0%	0%	No	0%	No
Overland	13	1	No	0%	0%	0%	No	0%	No
Puma	58	18	Yes	76-99%	0%	1-25%	Yes	0%	Partial
R.M. Williams	33	7	No	100%	0%	0%	Partial	0%	Partial
Toms	15	5	Partial	100%	1-25%	1-25%	No	0%	No
VF Corp	54	13	Yes	100%	0%	0%	Yes	0%	Partial
Weyco Group	7	<1	No	1-25%	0%	0%	No	0%	No
Windsor Smith	0	0	No	0%	0%	0%	No	0%	No
Wittner	18	2	No	0%	0%	0%	No	0%	No
WM Ritchie	2	<1	No	1-25%	0%	0%	No	0%	No
Wolverine Worldwide	14	2	No	1-25%	0%	0%	No	0%	No

C. Supplier Relationships & Human Rights Monitoring - Inputs Production Cont.

COMPANY	FINAL SCORE	SUPPLIER RELATIONSHIPS & HUMAN RIGHTS MONITORING - SCORE OUT OF 34							
		81 Does the company have a policy addressing gender inequality in the supply chain, including a strategy to address discrimination and rights violations faced by women in the apparel industry?	82 What percentage of facilities are monitored with unannounced audits over a 2-year period?	93 What percentage of facilities are known to have other worker voice processes such as anonymous worker surveys or off-site worker interviews in place?	94 Does the company publicly report on the results of supplier monitoring and evaluation procedures?	101 What percentage of corrective action plans pertaining to wages and/or overtime are resolved within 12 months?	102 Where child and/or forced labour is found to exist, does the company have a process for responding to violations through dialogue with and primary consideration for the best interests of the affected stakeholders?	8. GENDER INEQUALITY: Company identifies and works to address gender inequality and discrimination throughout its supply chain.	9. MONITORING: Company regularly monitors labour rights standards throughout its supply chain including implementation of its code of conduct and supply chain policies.
Accent Group	16	4	No	0%	0%	0%	No	0%	No
Adidas	58	16	No	1-25%	1-25%	0%	No	1-25%	Partial
Allbirds	27	3	No	0%	0%	0%	No	0%	No
ASICS	31	6	No	0%	0%	0%	No	0%	No
Birkenstock	7	1	No	0%	0%	0%	No	0%	No
Blundstone	18	4	No	1-25%	0%	0%	No	0%	No
Brand Collective (Footwear)	22	4	No	1-25%	0%	0%	No	0%	No
Cotton On Group	42	15	Partial	1-25%	0%	0%	No	1-25%	Partial
Globe International Limited	10	2	No	0%	0%	0%	No	0%	No

Munro Footwear Group	18	5	No	0%	0%	0%	No	0%	No
New Balance	52	19	No	1-25%	0%	0%	No	0%	No
Ngahua Group	0	0	No	0%	0%	0%	No	0%	No
Nike	50	14	No	1-25%	0%	0%	Yes	0%	Partial
Nine West	0	0	No	0%	0%	0%	No	0%	No
Novo Shoes Pty Ltd	0	0	No	0%	0%	0%	No	0%	No
Overland	13	1	No	1-25%	0%	0%	No	0%	No
Puma	58	18	Partial	26-50%	0%	1-25%	Partial	0%	Partial
R.M. Williams	33	7	No	51-75%	0%	0%	No	0%	No
Toms	15	5	No	1-25%	0%	0%	No	0%	No
VF Corp	54	13	Partial	1-25%	0%	0%	Partial	0%	Partial
Weyco Group	7	<1	No	1-25%	0%	0%	No	0%	No
Windsor Smith	0	0	No	0%	0%	0%	No	0%	No
Wittner	18	2	No	1-25%	0%	0%	No	0%	No
WM Ritchie	2	<1	No	0%	0%	0%	No	0%	No
Wolverine Worldwide	14	2	No	1-25%	0%	0%	No	0%	No

C. Supplier Relationships & Human Rights Monitoring - Raw Material Production Cont.

COMPANY	FINAL SCORE	SUPPLIER RELATIONSHIPS & HUMAN RIGHTS MONITORING - SCORE OUT OF 34							
		81 Does the company have a policy addressing gender inequality in the supply chain, including a strategy to address discrimination and rights violations faced by women in the apparel industry?	82 What percentage of facilities are monitored with unannounced audits over a 2-year period?	93 What percentage of facilities are known to have other worker voice processes such as anonymous worker surveys or off-site worker interviews in place?	94 Does the company publicly report on the results of supplier monitoring and evaluation procedures?	101 What percentage of corrective action plans pertaining to wages and/or overtime are resolved within 12 months?	102 Where child and/or forced labour is found to exist, does the company have a process for responding to violations through dialogue with and primary consideration for the best interests of the affected stakeholders?	8. GENDER INEQUALITY: Company identifies and works to address gender inequality and discrimination throughout its supply chain.	9. MONITORING: Company regularly monitors labour rights standards throughout its supply chain including implementation of its code of conduct and supply chain policies.
Accent Group	16	4	Yes	1-25%	1-25%	1-25%	No	0%	Partial
Adidas	58	16	Yes	1-25%	1-25%	1-25%	No	0%	Partial
Allbirds	27	3	No	1-25%	0%	0%	No	0%	No
ASICS	31	6	No	1-25%	1-25%	1-25%	No	0%	Partial
Birkenstock	7	1	No	0%	0%	0%	No	0%	No
Blundstone	18	4	No	0%	0%	0%	No	0%	No
Brand Collective (Footwear)	22	4	No	0%	0%	0%	No	0%	No
Cotton On Group	42	15	Yes	1-25%	1-25%	1-25%	No	0%	Partial
Globe International Limited	10	2	No	0%	0%	0%	No	0%	No

Munro Footwear Group	18	5	No	0%	0%	0%	No	0%	No
New Balance	52	19	Yes	1-25%	1-25%	1-25%	No	0%	Partial
Ngahua Group	0	0	No	0%	0%	0%	No	0%	No
Nike	50	14	Yes	1-25%	1-25%	1-25%	No	0%	Partial
Nine West	0	0	No	0%	0%	0%	No	0%	No
Novo Shoes Pty Ltd	0	0	No	0%	0%	0%	No	0%	No
Overland	13	1	No	0%	0%	0%	No	0%	No
Puma	58	18	Yes	1-25%	1-25%	1-25%	No	0%	Partial
R.M. Williams	33	7	No	0%	0%	0%	No	0%	No
Toms	15	5	No	0%	0%	0%	No	0%	No
VF Corp	54	13	No	1-25%	0%	0%	No	0%	No
Weyco Group	7	<1	No	0%	0%	0%	No	0%	No
Windsor Smith	0	0	No	0%	0%	0%	No	0%	No
Wittner	18	2	No	0%	0%	0%	No	0%	No
WM Ritchie	2	<1	No	0%	0%	0%	No	0%	No
Wolverine Worldwide	14	2	No	0%	0%	0%	No	0%	No

D. Worker Empowerment - Final Stage Production

COMPANY

COMPANY	FINAL SCORE	11. LIVING WAGES: Company commits to pay living wages and is progressing against a timebound plan to meet this goal.	12. WORKER ENGAGEMENT: Company supports worker-led initiatives and other programs to educate workers in its supply chain on their labour rights.	13. FREEDOM OF ASSOCIATION: Company supports the ability of workers in its supply chain to freely form unions or associations and to collectively bargain for their rights.	14. GRIEVANCE MECHANISM: Company ensures mechanism(s) are in place which enable worker complaints to be heard anonymously and in their native language.
Accent Group	16	1	No	Partial	0% 0% No 1-25% No
Adidas	58	7	Yes	Partial	0% 1-25% Partial 0% 51-75% Partial
Allbirds	27	0	No	No	0% 0% No 0% No
ASICS	31	2	No	Partial	0% 0% No 0% Partial
Birkenstock	7	0	No	No	0% 0% No 0% No
Blundstone	18	0	No	No	0% 0% No 0% No
Brand Collective (Footwear)	22	2	No	No	0% 0% No 0% Yes
Cotton On Group	42	4	Partial	Partial	0% 26-50% Partial 1-25% Partial
Globe International Limited	10	0	No	No	0% 0% No 0% No

FINAL SCORE	WORKER EMPOWERMENT – SCORE OUT OF 25	11. LIVING WAGES: Company commits to pay living wages and is progressing against a timebound plan to meet this goal.	12. WORKER ENGAGEMENT: Company supports worker-led initiatives and other programs to educate workers in its supply chain on their labour rights.	13. FREEDOM OF ASSOCIATION: Company supports the ability of workers in its supply chain to freely form unions or associations and to collectively bargain for their rights.	14. GRIEVANCE MECHANISM: Company ensures mechanism(s) are in place which enable worker complaints to be heard anonymously and in their native language.
11.1 Has the company published a credible commitment to pay living wages based on a clear methodology with timeline and key milestones?					
11.2 Has the company adopted a living wage methodology and calculated a living wage for each region that it operates in?					
11.3 What percentage of facilities pay a living wage?					
11.4 What percentage of facilities have projects to improve wages?					
12.1 Are workers trained on their rights and entitlements, including: conditions of employment, freedom of association, and use of grievance mechanisms?					
13.1 What percentage of facilities are known to have independent democratically elected trade unions and/or collective bargaining agreements in place?					
14.1 Does the company have a functioning grievance mechanism which workers can access anonymously and in their native language?					

Munro Footwear Group	18	1	No	Partial	0% 0% No 1-25% No
New Balance	52	6	Yes	Partial	0% 1-25% Partial 0% 51-75% Partial
Ngahua Group	0	0	No	No	0% 0% No 0% No
Nike	50	5	Partial	Partial	0% 1-25% Yes 0% Partial
Nine West	0	0	No	No	0% 0% No 0% No
Novo Shoes Pty Ltd	0	0	No	No	0% 0% No 0% No
Overland	13	0	No	No	0% 0% No 0% No
Puma	58	7	Yes	Partial	0% 1-25% Partial 1-25% Yes
R.M. Williams	33	1	No	No	0% 0% No 1-25% Partial
Toms	15	1	No	Partial	0% 0% Partial 0% No
VF Corp	54	5	Partial	No	0% 1-25% Partial 0% Yes
Weyco Group	7	0	No	No	0% 0% No 0% No
Windsor Smith	0	0	No	No	0% 0% No 0% No
Wittner	18	0	No	No	0% 0% No 0% No
WM Ritchie	2	0	No	No	0% 0% No 0% No
Wolverine Worldwide	14	0	No	No	0% 0% No 0% No

D. Worker Empowerment - Inputs Production

COMPANY

COMPANY	FINAL SCORE	11.1	11.2	11.3	11.4	12.1	13.1	14.1	
Accent Group	16	1	No	Partial	0%	0%	No	0%	No
Adidas	58	7	No	Partial	0%	1-25%	Partial	0%	Partial
Allbirds	27	0	No	No	0%	0%	No	0%	No
ASICS	31	2	No	No	0%	0%	No	0%	No
Birkenstock	7	0	No	No	0%	0%	No	0%	No
Blundstone	18	0	No	No	0%	0%	No	0%	No
Brand Collective (Footwear)	22	2	No	No	0%	0%	No	0%	No
Cotton On Group	42	4	No	No	0%	0%	No	0%	No
Globe International Limited	10	0	No	No	0%	0%	No	0%	No

FINAL SCORE	WORKER EMPOWERMENT – SCORE OUT OF 25	11. LIVING WAGES: Company commits to pay living wages and is progressing against a timebound plan to meet this goal.	12. WORKER ENGAGEMENT: Company supports worker-led initiatives and other programs to educate workers in its supply chain on their labour rights.	13. FREEDOM OF ASSOCIATION: Company supports the ability of workers in its supply chain to freely form unions or associations and to collectively bargain for their rights.	14. GRIEVANCE MECHANISM: Company ensures mechanism(s) are in place which enable worker complaints to be heard anonymously and in their native language.
11.1	Has the company published a credible commitment to pay living wages based on a clear methodology with timeline and key milestones?	11.2	Has the company adopted a living wage methodology and calculated a living wage for each region that it operates in?	11.3	What percentage of facilities pay a living wage?
11.4	What percentage of facilities have projects to improve wages?	12.1	Are workers trained on their rights and entitlements, including: conditions of employment, freedom of association, and use of grievance mechanisms?	13.1	What percentage of facilities are known to have independent democratically elected trade unions and/or collective bargaining agreements in place?
14.1	Does the company have a functioning grievance mechanism which workers can access anonymously and in their native language?				

Munro Footwear Group	18	1	No	No	0%	0%	No	0%	No
New Balance	52	6	No	No	0%	0%	No	0%	No
Ngahua Group	0	0	No	No	0%	0%	No	0%	No
Nike	50	5	No	No	0%	0%	Partial	0%	Partial
Nine West	0	0	No	No	0%	0%	No	0%	No
Novo Shoes Pty Ltd	0	0	No	No	0%	0%	No	0%	No
Overland	13	0	No	No	0%	0%	No	0%	No
Puma	58	7	No	No	0%	0%	Partial	1-25%	Partial
R.M. Williams	33	1	No	No	0%	0%	No	0%	No
Toms	15	1	No	No	0%	0%	No	0%	No
VF Corp	54	5	No	No	0%	0%	Partial	0%	Partial
Weyco Group	7	0	No	No	0%	0%	No	0%	No
Windsor Smith	0	0	No	No	0%	0%	No	0%	No
Wittner	18	0	No	No	0%	0%	No	0%	No
WM Ritchie	2	0	No	No	0%	0%	No	0%	No
Wolverine Worldwide	14	0	No	No	0%	0%	No	0%	No

D. Worker Empowerment - Raw Materials Production

COMPANY

COMPANY	FINAL SCORE	WORKER EMPOWERMENT – SCORE OUT OF 25							
		11. LIVING WAGES: Company commits to pay living wages and is progressing against a timebound plan to meet this goal.				12. WORKER ENGAGEMENT: Company supports worker-led initiatives and other programs to educate workers in its supply chain on their labour rights.		13. FREEDOM OF ASSOCIATION: Company supports the ability of workers in its supply chain to freely form unions or associations and to collectively bargain for their rights.	14. GRIEVANCE MECHANISM: Company ensures mechanism(s) are in place which enable worker complaints to be heard anonymously and in their native language.
		11.1 Has the company published a credible commitment to pay living wages based on a clear methodology with timeline and key milestones?	11.2 Has the company adopted a living wage methodology and calculated a living wage for each region that it operates in?	11.3 What percentage of facilities pay a living wage?	11.4 What percentage of facilities have projects to improve wages?	12.1 Are workers trained on their rights and entitlements, including: conditions of employment, freedom of association, and use of grievance mechanisms?	13.1 What percentage of facilities are known to have independent democratically elected trade unions and/or collective bargaining agreements in place?	14.1 Does the company have a functioning grievance mechanism which workers can access anonymously and in their native language?	
Accent Group	16	1	No	No	0%	100%	Partial	1-25%	No
Adidas	58	7	No	No	0%	100%	Partial	1-25%	No
Allbirds	27	0	No	No	0%	0%	No	0%	No
ASICS	31	2	No	No	0%	1-25%	Partial	1-25%	No
Birkenstock	7	0	No	No	0%	0%	No	0%	No
Blundstone	18	0	No	No	0%	0%	No	0%	No
Brand Collective (Footwear)	22	2	No	No	0%	0%	No	0%	No
Cotton On Group	42	4	No	No	0%	100%	Partial	1-25%	No
Globe International Limited	10	0	No	No	0%	0%	No	0%	No

Munro Footwear Group	18	1	No	No	0%	0%	No	0%	No
New Balance	52	6	No	No	0%	76-99%	Partial	1-25%	No
Ngahua Group	0	0	No	No	0%	0%	No	0%	No
Nike	50	5	No	No	0%	76-99%	Partial	1-25%	No
Nine West	0	0	No	No	0%	0%	No	0%	No
Novo Shoes Pty Ltd	0	0	No	No	0%	0%	No	0%	No
Overland	13	0	No	No	0%	0%	No	0%	No
Puma	58	7	No	No	0%	100%	Partial	1-25%	No
R.M. Williams	33	1	No	No	0%	0%	No	0%	No
Toms	15	1	No	No	0%	0%	No	0%	No
VF Corp	54	5	No	No	0%	0%	No	0%	No
Weyco Group	7	0	No	No	0%	0%	No	0%	No
Windsor Smith	0	0	No	No	0%	0%	No	0%	No
Wittner	18	0	No	No	0%	0%	No	0%	No
WM Ritchie	2	0	No	No	0%	0%	No	0%	No
Wolverine Worldwide	14	0	No	No	0%	0%	No	0%	No

E. Environmental Sustainability

COMPANY	FINAL SCORE	ENVIRONMENTAL SUSTAINABILITY – SCORE OUT OF 20							
		15. FIBRE AND MATERIAL USE: Company assesses and seeks to improve the environmental impacts of the fibres and materials used in its products.				16. WATER AND CHEMICAL USE: Company assesses, monitors, and seeks to improve water and chemical use and pollution throughout its supply chain.			
		15.1 Has the company assessed the environmental impact of its top 3 fibres and materials used in its apparel products and implemented learnings from assessment into product design and production?	15.2 What percentage of the company's final product is made from sustainable fibres?	16.1 Does the company have a restricted substances list (RSL), and a manufacturing restricted substances list (MRSI) against which it tests compliance?	16.2 For what percentage of water intensive facilities has the company collected and benchmarked water use data?	16.3 Has the company used the above data to implement a water use plan?	16.4 For what percentage of wet-processing facilities has the company collected wastewater quality data?	16.5 Of these, do all have wastewater improvement strategies?	
Accent Group	16	3	Partial	1-25%	Partial	0%	No	0%	No
Adidas	58	17	Yes	51-75%	Yes	76-99%	Yes	76-99%	Yes
Allbirds	27	13	Yes	51-75%	Partial	0%	No	1-25%	No
ASICS	31	10	Partial	1-25%	Partial	51-75%	Partial	51-75%	Partial
Birkenstock	7	1	No	0%	No	0%	No	0%	No
Blundstone	18	6	No	1-25%	Partial	51-75%	Yes	51-75%	Yes
Brand Collective (Footwear)	22	4	No	1-25%	Partial	1-25%	Yes	1-25%	Yes
Cotton On Group	42	10	Yes	26-50%	Partial	1-25%	Partial	51-75%	No
Globe International Limited	10	1	No	0%	Partial	0%	No	0%	No
Munro Footwear Group	18	4	Yes	1-25%	No	0%	No	0%	No
New Balance	52	10	Yes	1-25%	Partial	26-50%	No	51-75%	Yes
Ngahua Group	0	0	No	0%	No	0%	No	0%	No
Nike	50	16	Yes	51-75%	Yes	76-99%	Yes	76-99%	Yes

Nine West	0	0	No	0%	No	0%	No	0%	No
Novo Shoes Pty Ltd	0	0	No	0%	No	0%	No	0%	No
Overland	13	6	No	1-25%	Partial	1-25%	Yes	1-25%	Yes
Oxford	22	6	Partial	1-25%	Partial	1-25%	Partial	1-25%	Partial
Puma	58	16	Yes	51-75%	Yes	76-99%	Yes	76-99%	Partial
R.M. Williams	33	11	Partial	1-25%	Partial	51-75%	Yes	51-75%	Yes
Toms	15	2	Partial	1-25%	No	0%	No	0%	No
VF Corp	54	17	Yes	26-50%	Yes	51-75%	Yes	100%	Yes
Weyco Group	7	3	No	1-25%	Partial	1-25%	Yes	1-25%	Yes
Windsor Smith	0	0	No	0%	No	0%	No	0%	No
Wittner	18	10	Partial	51-75%	Partial	51-75%	Yes	51-75%	Yes
WM Ritchie	2	0	No	0%	No	0%	No	0%	No
Wolverine Worldwide	14	6	Partial	1-25%	Partial	26-50%	Yes	26-50%	Yes

E. Environmental Sustainability Cont.

COMPANY	FINAL SCORE	ENVIRONMENTAL SUSTAINABILITY – SCORE OUT OF 20					
		17. CLIMATE IMPACT: Company has made a public commitment and is making progress to reduce climate impact throughout its supply chain.	18. IN-USE AND END-OF-LIFE IMPACT: Company assesses and seeks to improve the environmental impacts and resulting waste from its products while they are being used and at their end of life.	17.1 Has the company published an emissions reduction target and decarbonisation strategy in line with the current UN Fashion Industry Charter for Climate Action?	18.1 Has the company assessed the environmental impacts of the in-use and end-of-life phases of its products, and consciously implemented specific design features/strategies to address these issues?	18.2 Does the company communicate environmental impacts of product use and disposal with consumers, providing actionable strategies for reducing impact?	18.3 Has the company assessed the environmental impacts of over-production of finished goods, and implemented a strategy to reduce this impact?
Accent Group	16	3	No	No	Partial	Partial	
Adidas	58	17	Yes	Yes	Partial	No	
Allbirds	27	13	Yes	Yes	Yes	Partial	
ASICS	31	10	Yes	No	Partial	No	
Birkenstock	7	1	No	No	Partial	No	
Blundstone	18	6	No	No	Partial	No	
Brand Collective (Footwear)	22	4	No	No	Partial	Partial	
Cotton On Group	42	10	Partial	Partial	Yes	No	
Globe International Limited	10	1	No	No	Partial	No	
Munro Footwear Group	18	4	No	No	No	Partial	
New Balance	52	10	Partial	No	Partial	Partial	
Ngahua Group	0	0	No	No	No	No	
Nike	50	16	Partial	Yes	Yes	Partial	
Nine West	0	0	No	No	No	No	

Novo Shoes Pty Ltd	0	0	No	No	No	No
Overland	13	6	No	Partial	Partial	Yes
Puma	58	16	Yes	Partial	Partial	No
R.M. Williams	33	11	Partial	Partial	Partial	Partial
Toms	15	2	No	No	No	No
VF Corp	54	17	Yes	Yes	Yes	No
Weyco Group	7	3	No	No	No	No
Windsor Smith	0	0	No	No	No	No
Wittner	18	10	No	Partial	Partial	Partial
WM Ritchie	2	0	No	No	No	No
Wolverine Worldwide	14	6	No	No	Partial	No

Appendix 3: Company Statements

Munro Footwear Group

Munro Footwear Group (MFG) remains committed to improving its supply chain visibility and working to ensure that all individuals, no matter how removed, are provided with a safe and equitable working environment. MFG has partnered with external consultants and resourced specialist roles to ensure that it is taking the necessary steps to meet this commitment. MFG will continue to share its progress in this space on its [corporate website](#).

Given the nuances specific to the footwear manufacturing industry, MFG looks forward to BWA expanding its criteria to better reflect the footwear industry in the future.

Overland Footwear

When invited to make our submission to Tearfund at short notice, we embraced the opportunity to use the outcome to help inform the basis on our Sustainability strategy.

While our focus for many years has been building our internal culture and becoming New Zealand's best workplace, for both NZ and AU teams as well as our China team, we recognize the need to increasingly turn our focus to the wider supply chain and reducing our impact on the environment.

We look forward to benchmarking ourselves against peers in the footwear industry and working towards achieving our strategic goals in this area.

Puma

Our PUMA sustainability strategy is centered on creating maximum positive impact. Transparency brings dialogue and collaboration.

We have increased transparency related to our risk assessment methodology, our challenges and our progress towards our 10FOR25 goals like gender equality, scope 3 Green House Gas emissions, fair income, workers voice and an increased offer of more sustainable product to consumers.

For example: In 2021, 99% cotton, 80% polyester, 99.9% leather, and 100% down were sourced from sustainable sources, 43% polyester used in our products came from recycled sources. This was just 14% in 2020.

R.M. Williams

Responsibility is embedded in R.M.Williams' DNA. From conception, the values of longevity, quality, and purpose have defined R.M.Williams. Building on this legacy, we are transforming our business to meet the environmental and social needs of our time. Please visit our website at rmwilliams.com.au to read about our commitments and progress.

Wittner

Wittner prides itself on the level of quality and consistent service we've provided our loyal customers over the past 110 years. Over the years we have worked to continually take steps to improve our practices in both the sustainable and ethical space.

We recognise that further change is a positive step in continuing to align our business with current and developing standards in our industry and society. Without gradual and continual change we wouldn't be where we are today.

Appendix 4.

Survey Support Document

The Ethical Fashion Report is part of Baptist World Aid & Tearfund New Zealand's Behind the Barcode project. The Report seeks to empower consumers to purchase ethically and encourage companies to ensure they are protecting the rights of workers in their supply chain.

Behind the Barcode engages in dialogue with companies about their supply chain practices through a core survey. The survey asks companies to answer questions on their labour rights and environmental sustainability systems, as BWAA believes these have the most impact on workers in the garment industry and, correspondingly, vulnerable communities as a whole. We then assess the efforts of each company and publish those findings for consumers to see how their favourite brands rate.

The 2022 Ethical Fashion Report will be published in October 2022 with the accompanying Ethical Fashion Guide.

What information is made publicly available?

We do not publish the validating material that companies disclose in answering each question in the survey,

but we will publish the 'YES', 'NO' or percentage answers which generate the grades. Readers can assume that a company's published answer to any question is based on their supplying of the required validation documents to support their claim. For example, if a company has a 'YES' or '100%' answer to a question, they have supplied the documents that meet the standards set by Baptist World Aid & Tearfund New Zealand for 100% credit for that question.

How are evaluations conducted?

The grades are based on publicly available information and self-reported data by each company. We conduct each evaluation using an assessment tool that focuses on the company's human rights and environmental policies, as well as the measures undertaken to implement these policies.

All grades are sent to companies for review and feedback before they are made public. Where companies are unresponsive to our various attempts at engaging with them, we work to provide a fair assessment of the company's supply chain practices based on publicly available information only.

Questions fall into five categories, with weightings as follows:

A. Policies & Governance	6%
B. Tracing & Risk	15%
C. Supplier Relationships & Human Rights Monitoring	34%
D. Worker Empowerment	25%
E. Environmental Sustainability	20%

We distil complicated supply chain information by focusing on three key production phases of the fashion supply chain. These phases and their weightings are as follows:

1. Final Stage Production	45%
2. Inputs Production	35%
3. Raw Material Production	20%

For more information, please refer to www.behindthebarcode.org.au.

Survey Support

The grades are generated as a result of the YES/NO/PARTIAL, or percentage answers to each question. This document provides a guide to the rationale behind each question asked,

(This section is from the general Ethical Fashion Report Appendix and covers our overall research into the fashion industry)

and explains the validating information we require to assess each answer. Supporting information or data may be requested by our research team to put each company's answer in context.

We strive to grade all companies consistently, and consequently, every survey is cross-checked by a second member of the Ethical Fashion Team to ensure all assessments are fair and impartial, and completed to the highest quality. Baptist World Aid and Tearfund New Zealand seek to work closely with the companies we assess to develop grades that accurately reflect the labour rights management system in place and hope this document provides further guidance to understand what we are asking of your company.

Wherever possible, publicly available information has been used to pre-populate surveys for new companies (e.g. corporate social responsibility/sustainability reports, Commonwealth Modern Slavery Statements and ethical sourcing sections of websites). Companies will need to provide corresponding documentary evidence where requested, and provide responses for questions unable to be answered with publicly available information.

A. Policies & Governance

1. CODE OF CONDUCT

Company has a code of conduct that requires respect for labour rights at every tier of its supply chain.

1.1 Does the company have a Code of Conduct for suppliers?

Policy should cover all four points set out by the ILO Fundamental Principles to Rights at Work, the prohibition of regular and excessive overtime, and provisions to protect worker health and safety.

Rationale: Codes of Conduct are used by companies to communicate basic working standards expected from suppliers.

Validation: Provide the Code of Conduct. Full credit is awarded where the code covers the four ILO **Fundamental Principles and Rights at Work** AND **two ETI standards** including any clarifying sentences in italics. Partial is awarded where the code covers one or some of these rights.

1. Freedom of association and the effective recognition of the right to collective bargaining
2. Elimination of all forms of forced or compulsory labour
 - a. This includes ensuring the right to freedom of movement

for employees to enter and leave employment willingly and voluntarily through the prohibition of withholding employee identity documents.

3. Effective abolition of child labour
4. Elimination of discrimination with respect to employment and occupation
5. The prohibition of regular and excessive overtime
 - a. Working hours should not exceed 60 hours in any 7-day period. Regular working hours should be made clear in a contract, and not exceed 48 hours
6. Provisions to protect worker health and safety (WHS/OHS policy).

1.2 Does the code apply to multiple levels of the supply chain including the raw materials level?

Rationale: For a company to ensure the rights of all its workers, a Code of Conduct must be communicated and enforced at all stages of the supply chain. This question asks whether the company has communicated the requirements of the Code of Conduct beyond final stage of production suppliers (cut-make-trim).

Validation: Full credit will be awarded to companies that can evidence how the Code of Conduct is communicated to both Inputs Production and Raw Materials suppliers. At the raw materials stage this may be demonstrated through some certifiers e.g. BCI.

Partial credit is awarded where Code of Conduct standards are applied across two of the three stages.

1.3 Is the code included in supplier contracts?

Rationale: Including the Code of Conduct as a compulsory element of supplier contracts is a key way for companies to enforce core working standards.

Validation: Provide the company's supplier contract.

2. ACCOUNTABILITY

Company identifies clear points of accountability for human rights and environmental sustainability at the management and board level.

2.1 Does the company have a designated senior officer accountable for implementation, and a board committee/process tasked with oversight of its supply chain policies that address human rights and environmental sustainability?

Rationale: Companies must have delegated responsibilities for the oversight and implementation of policies and must ensure that human rights and environmental policies are embedded at the most senior level to ensure their implementation throughout the entire company. Having these delegated responsibilities ensures that all business activities are coherent with and account for the company's responsibility to respect human rights and environmental

sustainability. If not implemented consistently, staff continue to perform their role without awareness or regard for human rights or sustainability, and poor human rights and environmental practices can continue.

Validation: Full credit will be awarded where company can list both senior (executive leadership) and board level (individual member or governance/risk committee) positions responsible for implementation of policies with a description of their roles/how they are held accountable at both executive and board level. Partial credit will be awarded where staff positions are listed without description of roles for implementing policies, or where only one position can be listed/described.

B. Tracing & Risk

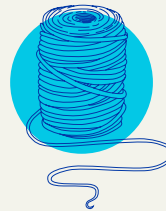
From this point on, all questions in sections 2, 3 and 4 are asked of three separate stages of the supply chain.

FINAL STAGE PRODUCTION	INPUTS PRODUCTION	RAW MATERIALS
CUT-MAKE-TRIM	TEXTILE PRODUCTION	PRIMARY FIBRE



RAW MATERIALS
COTTON (FARMING); WOOL, RAWHIDE, ETC (HUSBANDRY, SHEARING, ETC); CRUDE OIL FOR SYNTHETIC FIBRES, PLASTICS, ETC (EXTRACTION, REFINING)

INPUTS PRODUCTION
TEXTILES PRODUCTION (GINNING, SPINNING, KNITTING, DYING, EMBROIDERY); LEATHER (TANNING); PLASTIC (PROCESSING, MOULDING)



FINAL STAGE PRODUCTION
CUT-MAKE-TRIM (CMT) MANUFACTURING (CUTTING, SEWING, PRINTING)

For sections 2, 3 and 4, you will be reporting on all three stages of production. Please see the graph above to understand which production processes we classify under each stage of production.

For Inputs Production, companies should nominate a primary production process based on human right risk. Typically, this will require

companies to report on fabric mills unless the company's primary fibre differs greatly to that of a textile production chain (e.g. leather).

For Raw Materials, you may select just one fibre, which should be selected based on volume (being your most used fibre) or risk (that fibre which has demonstrated the highest labour rights risks).

3. TRACING AND TRANSPARENCY

Company traces and is transparent about its suppliers at all levels of its supply chain.

3.1 Approximately what percentage of facilities (factories, mills, farms etc.) has the company traced?

By number of facilities, rather than volume of production. By traced we mean that the company has direct knowledge of the facility including name and location.

3.2 Provide total number of facilities that produce for the company, including all subcontracted producers (if known).

3.3 List all countries in which production takes place for each stage of the supply chain.

Rationale: Worker exploitation and modern slavery are a greater risk at the fringes of the supply chain in smaller, less scrutinised suppliers and subcontractors. This is a particular concern for those suppliers which are used for smaller and one-off orders where the company's compliance program may not extend, or with whom the company may have a shallower relationship.

Validation: For Inputs Production and Final Stage Production, please provide a percentage out of the total number of facilities, NOT the percentage of

production volume. For Raw Materials, we will accept the volume of production due to the prevalence of sourcing raw materials through programs and initiatives that do not provide total numbers. Credit may be awarded if fibre is being sourced through reputable certification (e.g. Fairtrade, BCI).

For Inputs Production and Raw Materials, where few companies have direct relationships, outline how traceability has been achieved.

Please note that although Questions 3.2 and 3.3 are non-assessable, and will not be made public, they will be used to validate company answers for subsequent questions. It is therefore important that this information is provided.

3.4 Is the company involved in a tracing project to identify the location of unknown suppliers?

Rationale: Companies that have not fully traced their supply chains have a higher risk of poor human rights and environmental practices occurring in their supply chain. We encourage companies to prioritise tracing their supply chain in full, and here seek to credit those companies with active tracing projects underway.

Validation: Describe the company's efforts to trace the location of unknown facilities at each stage of production. How does the company collect information including the names and addresses of facilities used beyond first tier suppliers?

If all suppliers at any of the production stages have been traced, select N/A for that stage.

3.5 Is there a public list of facilities?

Must include names and addresses.

Rationale: Publishing supplier lists is a key way for companies can demonstrate their commitment to being held accountable for issues in their supply chain. Transparency about supplier locations in particular is a valuable tool for civil society to verify that working conditions meet the standards companies claim to enforce and also identify a company to contact should a concern require remediation.

Validation: Provide a link to supplier lists. Full credit is awarded where there is a public list of all traced facilities at that stage of production, which includes the name and address of each facility. Partial credit is awarded where there is an incomplete list of traced facilities.

3.6 In addition to the facilities' names and addresses, does the company also publish at least three of the following indicators about each facility:

- The parent company of the business at the site
- Type of products made
- Worker numbers at each site
- Percentage of female workers at each site
- Percentage of migrant/temporary workers at each site

- Date of last audit
- Audit report and/or Corrective Action Plan

Rationale: This question exists to credit those companies that are going above and beyond the minimum expectations when it comes to corporate transparency.

Validation: Provide a link to where this information is published. Full credit will be awarded where at least three of the listed indicators are published for all facilities. Partial credit will be given for less than three indicators, or where additional information is provided for some of the suppliers that are publicly listed.

Partial credit may be awarded at researchers' discretion where facility names are provided with indicators, but without addresses.

Example: See Nike's [Interactive Manufacturing Map](#).

4. RISK

Company assesses and discloses material human rights and environmental risks throughout its supply chain.

4.1 Has the company conducted a labour rights risk assessment of its supply chain to improve its labour rights management system?

Please identify material human rights risks identified at each stage, including compulsory risks identified in Survey Support Document.

Rationale: Labour rights risks can vary according to different regional contexts, making it important for companies to understand the specific labour rights risks across its supply chain. By conducting a risk assessment, a company can not only better understand the risks, but also implement learnings to improve its labour rights management systems.

Validation: Describe what risk assessment has been done and for what portion of the supply chain, including details of how this assessment has been implemented to improve labour rights management systems.

Full credit is applied when a risk assessment has been conducted and it can be demonstrated that the assessment has been used to improve the company's labour rights management system. For full credit, companies must sufficiently reference risks related to:

- Ongoing COVID-19 related risks for garment workers; and
- Uyghur forced labour (for companies sourcing from China).

Partial credit is applied when a risk assessment has been conducted without any clear steps to improve the company's labour rights management system, or where one or both of the above specified risks are not mentioned.

Companies submitting a Modern Slavery Statement under the [Australian Modern Slavery Act \(Cth\)](#) may wish to provide and outline the key processes

of risk assessment and reporting that the company is using and/or has used in relation to meeting its mandatory reporting requirements under the Act.

4.2 Has the company undertaken an assessment of its environmental impacts and risks throughout its supply chain?

Rationale: When company decision-makers understand their environmental impacts and risks throughout the supply chain, they're better situated to develop a strategic approach to environmental issues.

Validation: Describe what risk assessment has been done and for what portion of the supply chain, including details of how this assessment has been implemented to reduce environmental impacts and risks.

Full credit is applied when a risk assessment has been conducted and it can be demonstrated that the assessment has been used to improve the company's environmental management system. Partial credit is applied when a risk assessment has been conducted, without any clear steps to improve the company's environmental management system.

A robust risk assessment may include environmental profit and loss statement, or environmental impact and risk assessment.

C. Supplier Relationships & Human Rights Monitoring

5. RESPONSIBLE PURCHASING

Company adopts fair and responsible policies and behaviours for supplier orders and contracts.

5.1 Does the company have a policy on responsible purchasing practices in relation to supplier engagement, including a strategy for the implementation of the policy?

Rationale: Labour rights must be upheld and precede the importance of delivery dates, lead times, and costings. Research from the International Labour Organisation demonstrates a negative correlation between companies' purchasing behaviour and the ability of fashion industry suppliers to uphold company mandated Codes of Conduct. This puts the lives and dignity of workers at risk, and leads to harmful impacts on workers such as failure to pay wages and benefits, use of excessive overtime (which may be forced), use of subcontractors (where WHS and labour conditions are unmonitored), and precarious employment resulting from increased use of temporary labour.

It is essential that all teams within a company, including, but not limited to; design, product development, production, and buying teams, are aware of the impact their purchasing and order behaviour has on the experience of workers and the conditions they work in.

Validation: Please provide a policy and accompanying strategy that addresses responsible purchasing practices. For full credit, the policy must include reference to the following points:

- Education/training of internal staff (buyers, production, design, etc.) on responsible purchasing practices and the impact of their behaviour on garment workers;
- Implementation of sufficient lead times through production planning, capacity, and forecasting;
- Maintenance of last-minute order changes, including acceptance of financial liability for resulting overtime and additional material costs;
- Pricing negotiations and payment, including: ensuring negotiations do not undercut the supplier's base costs, ringfencing labour costs to include allowance for legal minimum wage rises, contractual agreement of prices, and on-time payment;
- Opening a purposeful dialogue with suppliers to gauge constructive feedback on the success or harm resulting from the company's purchasing behaviour, enabling all parties to collaborate for the benefit of workers.

The accompanying strategy must demonstrate that the company has a credible plan in place for the implementation of each policy point.

Full credit will be awarded where both policy and strategy are provided, with strong links between the pair.

Best practice companies may also describe efforts to extend responsible purchasing practices and implementation of applicable policy points beyond final stage suppliers to include inputs and/or raw materials suppliers.

Example: We recommend that you review the Ethical Trade Initiative's (ETI) [Guide to Buying Responsibly](#) in developing/updating your policy on purchasing practices.

5.2 Does the company track data related to responsible purchasing practices including percentage of orders paid on time and percentage of retrospective changes made to orders or payment terms?

Rationale: Tracking data related to responsible purchasing practices is essential to ensure that the standards put in place are met, with worker welfare being central to the process. Tracking data such as order payments and retrospective order changes is beneficial to understanding the ongoing relationship between your efforts towards responsible purchasing practices and the flow-on impacts these may have on suppliers.

Validation: Describe how the company tracks data related to responsible purchasing practices, using the list of points in question 5.1 above as a guide. For full credit, the following data points must be tracked and disclosed:

- Percentage of orders paid on time (within 60 days); and
- Percentage of retrospective changes made to orders or payment terms after the original purchase order agreement was made.

Partial credit will be awarded where description is provided without data points, or data points without description.

6. SUPPLIER RELATIONSHIPS

Company establishes strong supplier relationships to incentivise good labour rights and environmental practices.

6.1 Does the company train suppliers to understand their responsibility for upholding and implementing labour rights and health and safety standards?

Rationale: Monitoring methods such as audits can only provide a snapshot of working conditions as observed at periodic intervals. It is important that suppliers and factory managers are skilled at identifying workplace issues which may arise in front of them. Training is one way a company can support this and ensure that problems are properly remediated.

Validation: Detail training and who it is provided to. Training should specify the workers' rights to:

- Employment under and with full understanding of the legal conditions of their employment
- A safe and healthy workplace
- Freedom of association
- Access to and function of grievance mechanisms.

Full credit is awarded where training in all of these areas is provided to suppliers/factory managers. Partial credit will be awarded where suppliers/factory managers are trained in some but not all areas.

6.2 Does the company actively seek to improve its influence and leverage with suppliers through initiatives such as MSIs, supplier consolidation, and industry collaboration?

Rationale: Fashion companies have historically had little leverage over suppliers and worker conditions due to small order amounts comparative to factories' full capacities. However, there are ways that brands can increase their leverage with suppliers to improve labour rights. This question seeks to credit companies driving labour rights change through increasing leverage with suppliers, via MSIs, supplier consolidation, and collaboration with industry peers.

Validation: For full credit, companies must demonstrate how their initiatives cause suppliers to improve standards for workers.

Examples include:

- MSIs which encourage suppliers to improve worker conditions (or make it more difficult not to). Membership and evidence of positive improvement must be demonstrated. E.g. International Accord, Action Collaboration Transformation (ACT), Fair Labor Association;
- Companies who have significantly consolidated their supply chain to increase leverage with remaining suppliers through higher order volumes, and can demonstrate that this has increased leverage for change;
- Companies who have partnered with one or more industry peers sourcing from the same factories to leverage change/encourage suppliers to adopt new practices.

6.3 Does the company have a preferred supplier program by which suppliers are incentivised for strong labour rights and/or environmental sustainability records?

Rationale: Factory managers may require assurance of future orders before they are prepared to invest in improving working conditions and wages. A preferred supplier program which links continuously improving and high levels of social and environmental compliance with the selection of suppliers for orders is a direct incentive for factories to strive for continued improvement. This question is looking for a correlation between strong labour conditions

and/or environmental performance, and increased orders to that facility.

Validation: Please describe the program in place. For full credit, the program must:

- Show a standard of distinction (either between approved suppliers, or a high standard required of all suppliers) on the basis of labour rights records/ environmental sustainability, and;
- Exhibit preferential treatment based on that distinction, e.g. increased orders, guaranteed orders, training within facilities. The program must incentivise strong labour rights/ environmental sustainability and not just communicate them as a minimum standard, and it needs to have been communicated to suppliers (therefore not just an internal ranking system).

For companies who own a portion of their supplier base and have evidenced that this leads to stronger labour rights/environmental standards, partial credit will be awarded. If company owns 100% of their supplier base, full credit will be awarded.

7. FORCED LABOUR, CHILD LABOUR AND HUMAN TRAFFICKING

Company identifies and works to address risks of forced labour, child labour and human trafficking throughout its supply chain.

7.1 Has the company produced a Modern Slavery Statement?

(Companies who are not required to submit a statement in Australia must evidence efforts to assess modern slavery risks meeting the seven points stipulated in Survey Support Document.)

Rationale: The Commonwealth Modern Slavery Act came into force on the 1st of January 2019, requiring businesses in the Australian market with a consolidated revenue of at least AUD\$100 million to submit a Modern Slavery Statement annually. For companies under this threshold or outside of this jurisdiction, we are seeking an equivalent assessment of modern slavery risks and mitigation measures.

Validation: Please provide a link to your Modern Slavery Statement, either on your website or on the registry. The statement must outline the actions taken by the company to assess and address the risks of modern slavery in their global supply chains. For full credit, all 7 mandatory criteria as stipulated by the Act must be covered. Partial credit may be awarded where only some of the criteria are included.

Criteria includes:

1. Identify the reporting entity
2. Describe the reporting entity's structure, operations and supply chains
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls

4. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes
5. Describe how the reporting entity assesses the effectiveness of these actions
6. Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement), and
7. Provide any other relevant information.

If the company is under the revenue threshold for submission, they must demonstrate some level of effort that matches the intentions of the Act with regards to disclosure of modern slavery risks in their supply chain, and efforts to address these.

7.2 Does the company ensure that there is no unauthorised subcontracting and that all authorised subcontracted production adheres to code standards?

Rationale: Worker exploitation is most likely to arise in more distant and removed parts of the supply chain, such as subcontracted facilities. This question is asking whether there are steps taken to ensure that the standards laid out in the code are adhered to in subcontracted facilities.

Validation: Please provide information on the program or steps undertaken for each stage of production. If subcontracting is not allowed in any situation, company must stipulate how this is monitored. For companies who allow primary suppliers to use subcontractors, details must be provided on process for ensuring subcontracted production is adhering to code standards.

7.3 Does the company track suppliers' use of vulnerable workers?

Incl. migrant, temporary/contract and female workers

Rationale: Vulnerable workers are common to most supply chains. Temporary and contract workers commonly fill positions created by a short-term increase in demand, while migrant workers travel away from home for work where factories are located. These workers are vulnerable as the nature of their employment is less stable, which can leave them more likely to be exploited as they feel less secure about asserting their rights at work.

Distance from home and visas which link residence to employment can also make vulnerable workers feel apprehensive about asserting workplace rights. There is nothing inherently wrong with a factory employing temporary/contract, migrant or female workers, but the presence of these workers in a factory may signify a portion of the workforce who require additional attention to ensure

their rights are upheld. For example, a disproportionately high use of temporary and contract workers within a workplace may signify a systemic attempt to get around legislative protections for permanent workers.

Validation: Describe how this is tracked for each stage of production and provide data showing results.

7.4 Are suppliers monitored for their use of labour brokers and recruitment fees?

Rationale: The use of labour brokers means that there is another party involved in the recruitment of workers which raises concerns for instances of modern slavery including forced labour and debt bondage. Modern slavery typically arises where there is deception, coercion or fraud in the recruitment process, and the presence of a broker between a worker and their employer increases the risk of this occurring. Charging recruitment fees to new employees often creates debt bondage which amounts to a form of forced labour. For this reason, companies must monitor any use of labour brokers to ensure exploitative practices are not occurring.

Validation: Describe how this monitoring takes place.

8. GENDER INEQUALITY

Company identifies and works to address gender inequality and discrimination throughout its supply chain.

8.1 Does the company have a policy addressing gender inequality in the supply chain, including a strategy to address discrimination and rights violations faced by women in the apparel industry?

Rationale: This question aims to determine whether the company has a policy and an implementing strategy that addresses the differential impacts the garment industry has on female workers. This includes (but is not limited to):

- Verbal and physical abuse;
- Sexual harassment;
- Reproductive discrimination;
- Full and equal participation;
- Gendered processes of migration;
- Health impacts;
- Childcare responsibilities.

Validation: Please provide a policy that addresses gender inequality in the supply chain, including a strategy to address discrimination faced by women in the apparel industry.

Example: See Clean Clothes Campaign's **Made by Women** report and **Fair Labour Association's report Triple Discrimination: Woman, Pregnant and Migrant** for further information.

9. MONITORING

Company regularly monitors labour rights standards throughout its supply chain including implementation of its code of conduct and supply chain policies.

9.1 What percentage of facilities are monitored over a 2-year period by trained social auditors or through worker-led processes (i.e. includes worker participation and is guided by workers' rights and priorities)? This may also include shared monitoring through collaboration with MSIs or other companies.

Rationale: Social audits by trained social auditors and other equivalent monitoring processes provide an independent snapshot of working conditions by staff qualified to look specifically for exploitative practices. Only what is detected can be remediated, which makes monitoring an invaluable part of a labour rights management system.

Traditional forms of social auditing are not always the most reliable methods for uncovering issues. We welcome other innovative forms of monitoring which are worker centric and aim to address issues present in audits. Worker-led monitoring processes must include worker participation and be guided by workers' rights and priorities.

Audit/monitoring fatigue and COVID-19 have both had negative impacts on companies' ability to perform effective audits. Evidence of the use of audit sharing platforms and alternative forms of monitoring will be accepted.

Validation: Describe the monitoring process and frequency, and provide a breakdown of the percentage of facilities that are monitored by internally trained staff and third-parties, and/or through worker-led

processes. We collect this data to obtain a fuller understanding of the monitoring processes in place.

If audits are the company's primary form of supplier monitoring please include the names of the third-party/third parties used and/or the social audit training provided to staff who conduct audits. Please do not answer based on self-assessment questionnaires, or monitoring visits conducted for other purposes such as product quality or environmental compliance.

If companies use other forms of monitoring, including worker-led processes, please also provide a description of these and explain how the company came to use these processes alongside, or as an alternative to, traditional auditing.

9.2 What percentage of facilities are monitored with unannounced audits over a 2-year period?

Rationale: Announced audits alone can only provide a snapshot of working conditions in a facility and audit quality can vary greatly. Unannounced audits can add another dimension to the social compliance program and enhance the accuracy of data gathered.

Validation: Provide a breakdown specifying what percentage of factories receive unannounced audits and examples of findings gathered from these audits.

9.3 What percentage of facilities are known to have other worker

voice processes such as anonymous worker surveys or off-site worker interviews in place?

Rationale: Processes such as anonymous worker surveys and off-site interviews allow for a more in-depth assessment of factory conditions and add an important dimension to collective bargaining. Such processes, when conducted in a way that the workers trust (at arm's length from factory management), allow for workers' concerns to be heard, particularly in regions where independent union activity is outlawed or heavily restricted.

Validation: Provide a breakdown specifying what percentage of factories use other worker voice processes such as anonymous worker surveys and off-site worker interviews to hear workers' concerns. Please outline the processes in place and provide examples of the findings. Please note grievance mechanisms do not receive credit for this question.

9.4 Does the company publicly report on the results of supplier monitoring and evaluation procedures?

(E.g. percentage breakdown or number of facilities with remediation plans, selected audit findings on multiple topics, summary of assessment findings or aggregate facility ratings.)

Rationale: Disclosure of instances of worker exploitation or violations of the Code of Conduct is a measure of a mature social compliance system, rather than an indication of failure.

It is undetected and un-remediated breaches which are the greatest concern. We are looking for broad disclosure of the breaches found through the company's compliance monitoring, along with description of remediation steps undertaken.

Validation: Provide a link to where this information is publicly available. This information could include:

- Percentage breakdown or number of facilities with remediation plans;
- Selected audit findings on multiple topics;
- Summary of assessment findings or aggregate facility ratings.

Best practice reports should be published with details of how these breaches are being remediated, but this is not necessary for credit for this question.

10. REMEDY AND CORRECTIVE ACTION

Company ensures all labour rights issues and violations are remediated in the best interests of the impacted workers and their communities

10.1 What percentage of corrective action plans pertaining to wages and/or overtime are resolved within 12 months?

Rationale: Corrective action plans (CAPs) addressing issues such as wages and excessive overtime are often not resolved efficiently or effectively. These issues often occur repeatedly in facilities and

little to no progress is made towards remediating them over time.

Validation: In addition to selecting the correct percentage for each stage of production, we also require audit evidence. Please provide relevant audit documentation (for example, the CAP and the follow-up audit) demonstrating how wage and/or overtime issues have been resolved in 12 months.

Companies seeking credit higher than 25% must provide a list of all facilities with CAPs raised, and also list all CAPs closed (including dates). The researcher will then select up to five CAPs (with audits) at random for the company to provide as evidence.

If a company is claiming that no CAPs have been raised, then they must provide audits that demonstrate no CAPs raised.

If a company is claiming over 50%, instead of asking for greater than 5 CAPs/follow-up audits, we will enquire as to how you have closed so many CAPs, including the processes used to identify, track and resolve wage and overtime issues long term.

10.2 Where child and/or forced labour is found to exist, does the company have a process for responding to violations through dialogue with and primary consideration for the best interests of the affected stakeholders?

Rationale: The mark of a strong social compliance system isn't necessarily the absence of child or forced labour, but the

discovery and effective remediation of it. This question credits those companies that have been proactive and prepared for the event that child or forced labour is discovered in their supply chain, no matter how unlikely they feel that is.

Validation: Please provide the company's child and forced labour remediation policies and outline the remediation procedures in place. Where the company can demonstrate a robust remediation procedure for both child AND forced labour, full credit will be awarded.

A robust corrective action process includes: a process for responding to violations through dialogue with and primary consideration for the affected stakeholders, including evidence that remedy(ies) are satisfactory to the victims or groups representing the victims and/or implementation of corrective actions, and potential actions taken in cases of non-compliance.

Examples and Resources:

- Impactt Limited's [Child Labour Operational Principles](#)
- International Labour Organization's [Guidance Tool on "How to do Business with Respect for Children's Right to be Free from Child Labour"](#)
- International Labour Organization's [Child Labour Platform](#)
- International Labour Organization's [Combating Forced Labour: A Handbook for Employers and Business](#)

D. Worker Empowerment

11. LIVING WAGES

Company commits to pay living wages and is progressing against a timebound plan to meet this goal.

11.1 Has the company published a credible commitment to pay living wages based on a clear methodology with timeline and key milestones?

Rationale: This is a strong step in transparency, demonstrating a company's willingness to be held publicly accountable for making progress towards paying living wages in its supply chain.

Validation: Provide a link to where this information is made publicly available. Full credit will only be given if all criteria are met (clear methodology, timeline with measurable key milestones). Partial credit will be given if only some of the criteria are met.

11.2 Has the company adopted a living wage methodology and calculated a living wage for each region that it operates in?

Rationale: The debate over what constitutes a living wage has often been an obstacle to developing a living wage standard which can be applied across a vast supply chain. Consequently, credit is awarded for the adoption of industry accepted methodologies, such as calculations done using the

Anker methodology by the ISEAL Alliance or the Asia Floor Wage.

Validation: For full credit, please outline steps taken to adopt an existing methodology which provides a calculation for a living wage in each of the company's sourcing regions. Please include the calculated result for each region. If there is no accepted methodology for any of the company's sourcing regions, we will accept an independent calculation based on an assessment of what is required to meet a family's needs (with some discretionary income/savings) in each region, and how this amount will be earned without working overtime. This process should involve consultation with local labour organisations. Partial credit will be awarded if the company can demonstrate initiatives in some of their sourcing regions.

Note: 'Regions' must at minimum include each different country a company sources from. For companies sourcing from China or India, please provide a breakdown of sourcing regions including the different regional calculations.

Further Resources:

- [The Industry Wage Gap](#)

11.3 What percentage of facilities pay a living wage?

Validation: In addition to selecting the correct percentage for each stage of production, please provide relevant audit documentation demonstrating that a living wage

(aligned with the calculations provided above) is being paid.

If the company is seeking 1-25% credit, please provide a sample of 5 audits for each stage of production. If claiming more than 25% credit, please explain how this has been achieved, and provide a list of all facilities the company claims pay workers a living wage. From this list, our researchers will select a random sample for which we request to see audit documentation.

For companies who complete more than 50% of their production volume at company owned facilities, up to 50% of credit in this question may be assessed based on living wages paid in these facilities. E.g. A company sources from 10 factories, but owns 3 of these in which they produce 80% of their volume. The company pays living wages in 100% of their owned factories. Therefore, they are able to claim 50% credit in this question based on owned facilities. The remaining 50% credit in this question will be assessed on any living wage evidence provided for the outsourced factories.

11.4 What percentage of facilities have projects to improve wages?

Select 100% if all factories pay a living wage.

Rationale: This question aims to award credit for other efforts to improve worker incomes. It is not prescriptive about how this may be achieved but rather seeks to reward initiative toward the goal of paying a living wage in the absence of a

widely agreed standard and solution.

Validation: Detail projects and how they work to improve wages or worker income in other ways. Partial credit will be awarded if the company can demonstrate initiatives in some of their sourcing regions.

Example: FairTradeUSA's Apparel Standard seeks to improve worker incomes by paying a 'fair trade premium' which a committee of workers votes to decide how to disperse. This may be either among workers or to contribute to community development initiatives which will improve their welfare.

12. WORKER ENGAGEMENT

Company supports worker-led initiatives and other programs to educate workers in its supply chain on their labour rights.

12.1 Are workers trained on their rights and entitlements, including: conditions of employment, freedom of association, and use of grievance mechanisms?

Rationale: Workers are best able to advocate for their rights and safety when they are equipped with knowledge about their legal rights and entitlements, as well as the mechanisms available to them. Essential knowledge includes:

- **Conditions of employment:** a contract which outlines the worker's terms of employment, including pay, hours, rights and entitlements,

and length of contract (if relevant), provides a foundation for workers to be able to advocate for their rights.

- **The worker's right to freedom of association:** an understanding of the right to organise and collectively bargain to ensure rights are respected is critical to ensuring workers are able to voice and resolve workplace issues
- **Grievance mechanisms:** A worker's right to raise a grievance is only effective if the worker understands how to raise an issue. Involving workers in the development and implementation of a grievance mechanism and all workers to use the mechanism builds confidence in the systems and improves uptake rates.

It is crucial that workers understand these rights and are assured that they will not face discrimination or harassment if they choose to exercise their rights to freely associate.

Validation: Describe how workers are trained or otherwise informed in each area and how consistently training is provided across the supply chain.

13. FREEDOM OF ASSOCIATION

Company supports the ability of workers in its supply chain to freely form unions or associations and to collectively bargain for their rights.

13.1 What percentage of facilities are known to have independent democratically elected trade unions and/or collective bargaining agreements in place?

Rationale: Workers that engage with unions are best placed to voice and resolve workplace issues. One of the most effective ways to address exploitation is ensuring that workers can organise and collectively bargain to see their rights realised.

Validation: List facilities with active unions and provide the names of the unions. For facilities with no unions, list and indicate if there is an active Collective Bargaining Agreement in place. Please note, in lieu of providing a list of facility and union names, we will consider audit reports with union names redacted, if it is clear from the available documentation that there is an independent, democratically elected trade union present in the facility.

For facilities in countries where independent union activity is heavily regulated or illegal, such as China, we do give credit for other forms of democratically elected worker representative groups. The company must demonstrate how they test that the groups are worker-led and independent of factory management.

14. GRIEVANCE MECHANISM

Company ensures mechanism(s) are in place which enable worker complaints to be heard anonymously and in their native language.

14.1 Does the company have a functioning grievance mechanism which workers can access anonymously and in their native language?

Company must do more than hear complaints; must include investigation and efforts to address grievance.

Rationale: Grievance mechanisms are a key method for workers to report issues to an outside party so that unresolved issues may be addressed. It is particularly useful for protracted problems which factory managers have not resolved, or where workers are not comfortable reporting issues to factory management out of fear of retribution.

Validation: Please describe mechanism. A robust grievance mechanism will meet the following criteria, derived from Principle 31 of **The United Nations Guiding Principles of Business and Human Rights:**

- Available in workers' native language;
- Anonymity is ensured;
- Enables trust from workers and provides assistance for those who face barriers to access;
- Clear and known procedure and timeframe;
- Thorough investigation and remediation of grievances;
- Avenue to escalate concerns to an external party if the worker feels their concern has not been sufficiently addressed.

For full credit, the company must evidence a grievance mechanism that meets the above criteria and provide data showing worker use of the mechanism and issues remediated by the company.

E. Environmental Sustainability

15. FIBRE AND MATERIAL USE

Company assesses and seeks to improve the environmental impacts of the fibres and materials used in its products.

15.1 Has the company assessed the environmental impact of its top 3 fibres and materials used in its apparel products and implemented learnings from assessment into product design and production?

Rationale: Fibres have different impacts depending on their type, source and how they are processed. This question seeks to improve understanding of the top 3 fibres used by volume and implement that understanding into the product design stage. Environmental impacts can thereby be prevented rather than treated after the fact.

Validation: For full credit, please identify your top 3 fibres by volume, demonstrate that the company has assessed the impacts of these fibres using a recognised methodology (e.g. Natural Capital Accounting, Lifecycle Assessment, Environmental Profit and Loss Statement) and explain how these assessments have been used to set targets with accompanying strategies for improving the areas identified as highest impact in product design and production e.g. a material sustainability

index, using more sustainable fibres, less water-intensive dyeing processes.

15.2 What percentage of the company's final product is made from sustainable fibres?

Rationale: Many fibres are available from more sustainable sources than conventionally sourced. This includes fibres that are cultivated using less water or chemical-intensive processes, recycled fibres, and other new and innovative sustainable fibres.

Validation: Explain what sustainable fibres you use and what this represents as a percentage of the company's final product volume. We credit in alignment with **Textile Exchange's Preferred Fibre or Material list.**

MANUFACTURED FIBRES/MATERIALS	
Synthetic fibres	Man made cellulosic fibres
Recycled polyester (rPET)	Lyocell (e.g. FSC, PEFC, wood and bamboo)
Recycled nylon (rPA)	Preferred modal (pModal) (e.g. FSC, PEFC)
Bio-based polyester (bPET, bPTT, PLA)	Preferred viscose (pViscose) (e.g. FSC, PEFC, EU Eco Label)
Bio-based nylon	Recycled cotton/cellulose waste (e.g. Lenzing Refibra)
Artificial Spider Silk (e.g. Spiber, Bolt Threads, SM Silk)	Recycled biomass/waste (e.g. citrus waste)

We give credit for the following sustainable fibres, in alignment with **Textile Exchange's Preferred Fibre or Material portfolio** (refer to pages 23-25). These fibres have been selected because of their more sustainable properties in comparison to conventional options.

NATURAL FIBRES/MATERIALS	
Plant-based fibres	Animal fibres
Organic Fair Trade cotton	Organic wool
Organic cotton	Responsible wool
Fair Trade cotton	Responsible cashmere
CmiA cotton	Recycled wool
BCI cotton	Certified down (Responsible Down, Traceable Down)
REEL cotton	Recycled down
Recycled cotton	Organic silk
Organic linen	Fair Trade silk
Organic hemp	Ahimsa/Peace Silk
Preferred rubber (Fair Rubber, FSC Certified, Global Organic Latex Standard (GOLS), organic, recycled)	Preferred leather (organic, Leather Working Group, recycled, Land to Market)

The sustainable quality of the above fibres has been determined through consideration of their water use, wastewater discharge, chemical use, energy use, land management and waste impact. If you seek credit for a fibre not in this list, please provide a rationale according to the same criteria. We recommend reviewing information provided by [Textile Exchange](#).

16. WATER AND CHEMICAL USE

Company assesses, monitors, and seeks to improve water and chemical use and pollution throughout its supply chain.

16.1 Does the company have a restricted substances list (RSL), and a manufacturing restricted substances list (MRSL) against which it tests compliance?

Rationale: A restricted substances list ('RSL') defines permitted levels of chemical content and chemical exposure (and other harmful substances) for final products. A manufacturing restricted substances list ('MRSL') defines banned and restricted hazardous substances potentially used and discharged into the environment during manufacturing. Quality assurance systems including testing should be used to ensure that facilities comply with the RSL and MRSL.

Validation: For full credit, companies must provide:

- RSL and evidence of compliance testing and/or quality assurance systems; and

- MRSL and evidence of compliance testing and/or quality assurance systems.

Partial credit will be awarded if the company can provide evidence of some but not all requirements above.

Note: Some companies find that RSLs and MRSLs are managed by their compliance department rather than their ethical sourcing department, so we recommend checking this internally with your colleagues.

Example: A company example of both an [RSL and MRSL](#) list, including provisions for [compliance testing](#), can be found from Marks & Spencer.

16.2 For what percentage of water intensive facilities has the company collected and benchmarked water use data?

Rationale: Apparel production is water-intensive. Water-intensive facilities undertake washing, dyeing and finishing treatments. The majority of high water-intensity facilities are found at the inputs production tier.

This question aims to increase company understanding of actual and ideal water usage in water-intensive facilities throughout their supply chain.

Validation: Please list identified facilities, water use data collected for these facilities, and a benchmarking methodology. Benchmarking means identifying current facility usage, ideal/efficient facility water usage, and any gap to be improved upon.

For companies reporting on leather footwear, please report on tanneries. For other footwear materials, please report on the most water intensive process.

Note: This question is assessed on percentage of water intensive facilities by volume of production, not number of facilities.

16.3 Has the company used the above data to implement a water use plan?

Rationale: This question aims to implement the learnings from the previous question. Once the benchmarking process has been completed and the ideal water usage identified, a water use plan will map out steps to help reach this goal.

Validation: Provide a water consumption reduction plan for identified facilities based on benchmarking data. This should include water reduction targets and strategies for improvement, and data on your progress.

16.4 For what percentage of wet-processing facilities has the company collected wastewater quality data?

Rationale: Wet-processing facilities include those that undertake washing, dyeing, printing and finishing processes. These facilities are more likely to have effluent that is environmentally hazardous if not treated prior to release into the environment.

Validation: List identified facilities and wastewater quality data collected. Please advise how the wastewater quality data was collected.

For companies reporting on leather footwear, please report on tanneries. For other footwear materials, please report on the most water polluting process.

Note: this question is assessed on percentage of water intensive facilities by volume of production, not number of facilities.

16.5 Of these, do all have wastewater improvement strategies?

E.g. Wastewater quality testing to a standard, wastewater treatment systems

Rationale: Wastewater management can be achieved through wastewater treatment systems, inputs management, wastewater quality testing, standards development and implementation, and a combination of the above. Once the benchmarking process has been completed and the metrics for appropriate wastewater quality are identified, a wastewater improvement strategy will map out steps to help reach this goal.

Validation: For full credit, explain the wastewater quality and disposal improvement strategies for all wet-processing facilities and provide data on progress.

17. CLIMATE IMPACT

Company has made a public commitment and is making progress to reduce climate impact throughout its supply chain.

17.1 Has the company published an emissions reduction target and decarbonisation strategy in line with the current UN Fashion Industry Charter for Climate Action?

Rationale: Greenhouse gas emissions are a consequence of all stages of the supply chain. The 2018 [UN Fashion Industry Charter for Climate Action](#) (UNFICCA) is a worldwide framework to address the impact of the fashion industry on global environmental degradation, including greenhouse gases. Company commitment to this target does two things: firstly, it indicates to governments that the private sector endorses and seeks to align its practices with the Charter; and secondly, it sets a target for companies to bring their supply chain energy usage into line with global standards.

Validation: Provide a link to public commitment. Full credit is given if the company can provide either of the following:

- A public commitment to reduce aggregate greenhouse gas emissions by 50% by 2030 (against a baseline of no earlier than 2019) across scopes 1, 2, and 3, and a commitment to achieving net zero emissions no later than 2050; OR
- A public commitment approved by

Science Based Targets (SBTi) to reduce emissions and set targets in line with the latest criteria and recommendations of the SBTi, and a commitment to achieving net zero emissions no later than 2050.

Company must evidence they have undertaken a supply chain assessment to identify and assess/benchmark areas of greatest climate impact, with an accompanying strategy to reach these targets; and most provide data demonstrating progress against specified targets.

Further resources:

- [UNFICCA Climate Action Playbook](#) – this document provides strategies for implementing a decarbonisation strategy, including a description of scopes 1, 2, and 3.

Note: The UNFICCA was updated at COP26 In November 2021. This question has been updated in alignment.

18. IN-USE AND END-OF-LIFE ENVIRONMENTAL IMPACT

Company assesses and seeks to improve the environmental impacts and resulting waste from its products while they are being used and at their end of life.

18.1 Has the company assessed the environmental impacts of the in-use and end-of-life phases of its products, and consciously implemented specific design features/strategies to address these issues?

Rationale: The environmental impact of a product continues throughout its entire lifecycle, from cradle to grave. It is essential that designers are aware of the impacts their products can have once they are in the hands of consumers, and beyond this, at their end-of-life. Designers have a responsibility to address and reduce these impacts through responsible, considered design which looks at the full lifecycle of a garment, not just its production and inputs materials. Garments should be designed for longevity leading into circularity. The fashion industry must move towards a circular system, where clothing and footwear are designed to re-enter the value chain at their end-of-life as a valuable asset which will help to eliminate wastage of resources whilst ensuring a sustainable supply of material inputs.

This question is in alignment with agreement 10 from the UN's [Fashion Industry Charter for Climate Action](#).

Validation: For full credit, the company must demonstrate that they have evaluated the environmental impacts of their product at the in-use AND end-of-life phases, and applied findings into their design to reduce the product's impact. This may include elements of design for circularity, or initiatives that support circular or 'cradle to cradle' models such as design for durability, disassembly, recyclability and biodegradability.

Example:

- The use of monofibres simplifies the

textile recycling process helping to loop the product back into the value chain at its end of life. Use of [C2C certified fabrics](#) are a great way to start implementing circularity. This is an example of design for recyclability.


- Decreasing the usage of coatings and glues allows the product to be easily separated into different components at its end of life and thus recycled. This is an example of design for disassembly.

We recommend that you refer to Global Fashion Agenda's Circular Design Toolbox for further information and suggestions on implementing circularity into fashion design.

18.2 Does the company communicate environmental impacts of product use and disposal with consumers, providing actionable strategies for reducing impact?

Rationale: Consumer use and post-consumer clothing disposal is responsible for a large proportion of environmental impact over the course of garment lifecycles. [The Ellen Macarthur Foundation](#) estimates that a garbage truck load of textiles is incinerated or dumped in landfill every second, globally. Companies must work to minimise the impact of their textile product over the course of its life, even after a product leaves the store.

It is essential that consumers are engaged in education as part of a fully circular approach to mitigating environmental detriment. Garments should be designed/guaranteed for



longevity of use (with repair programs forming part of this), but once the item is no longer able to be repaired or used by the consumer it has the potential to re-enter the circular value chain as a new textile product. Take-back programs enable used textiles to be recycled into new materials, reducing landfill as well as the virgin resources required for new production.

Validation: For full credit, the company must demonstrate that they have communicated the environmental impacts for both in-use AND disposal with consumers, and have provided practical steps for them to take as a result of their impact assessment. A robust response will include a repair and/or take-back program that the company provides or substantively makes available to customers through partnership with a third-party organisation.

Partial credit will be awarded where only in-use or disposal impacts are referenced.

Example:

- Public explanation of the impacts of laundering (GHG emissions, microfibre water pollution). An appropriate recommendation would be using a microfibre filter washing bag (prevents microfibres from entering wastewater).
- Global Fashion Agenda's Garment Collection Toolbox provides information and suggestions for implementing garment collection into business models.

18.3 Has the company assessed the environmental impacts of over-production and disposal of finished goods, and implemented a strategy to reduce this impact?

Rationale: The overproduction and subsequent disposal of garments is a major contributor to environmental degradation, increasing landfill rates, emissions from incineration, and overloading used clothing markets. Overproduction begins in the production forecasting phase, and ends with the company's strategy for the disposal of unsold products. For the fashion industry to improve its sustainability, conscious production and disposal methods for unsold clothing is critical.

Validation: For full credit, company must provide a strategy and process for more sustainable production forecasting (reducing the amount of unsold clothing) AND a strategy and process for the sustainable disposal of unsold products. The strategies must include current baseline metrics for unsold clothing/disposal processes, with a description of the current processes in place and the timebound goals that the strategies aim to reach. Strategy must include: current baseline metrics for unsold clothing including customer returns and damaged/soiled goods, description of current processes in place, and timebound goals the strategy aims to reach.

Example:

- Production forecasting: the company may provide evidence of an analysis

undertaken to determine the quantity of unsold products in a line/season and demonstrate how the results of this analysis were used to forecast future ranges with a goal to eliminate unsold inventory.

- Disposal of unsold products: the company may provide an assessment of the environmental impact of the product disposal methods available, and demonstrates how they have taken action to deal with unsold clothing using a lower-impact method.

Appendix 5. Methodology


The 2022 Ethical Fashion Report (EFR) looks very different to reports from previous years. A numeric score and colour have replaced the old A to F grading system. While the appearance has changed, the underlying research approach behind the report and accompanying online Brand Finder tool continues to be built on the strength of the EFR methodology, developed and refined over the last nine years. Find out more about the methodology, how the EFR is researched, and why we've changed the way we are presenting this information.

WHAT WE FOCUS ON: THE EFR SURVEY

The Ethical Fashion Report Survey sets the agenda for what is assessed through the research. It was developed in 2013 with input from industry and academic experts. Each year, the survey questions and associated validation criteria are refined based on lessons learnt and ongoing industry developments. A more comprehensive review occurs every three to four years, drawing on external expertise.

The 2022 EFR is based on a survey that is substantially unchanged from 2021. The next major review is planned for 2023. The survey covers five major sections and comprises of 46 questions covering 18 different indicators of supply chain practice.

POLICIES & GOVERNANCE	1	Code of Conduct: does the company have a clear set of standards for all work in its supply chain?
	2	Accountability: does the company ensure senior leaders are held accountable for its ethical standards?
TRACING & RISK	3	Tracing and Transparency: does the company have a clear picture of where its goods are produced?
	4	Risk: does the company have a robust approach to identifying and managing the greatest ethical risks in its supply chain?
SUPPLIER RELATIONSHIPS AND HUMAN RIGHTS MONITORING	5	Responsible Purchasing Practices: does the company behave fairly and responsibly in the way it makes contracts and places orders?
	6	Supplier Relationships: does the company work with its suppliers to support them to operate ethically?
	7	Forced and Child Labour: does the company work to address the highest risks of forced and child labour in its supply chain?
	8	Gender Inequality: does the company work to address gender inequality and discrimination in its supply chain?
	9	Monitoring: does the company have systems in place to ensure breaches of its code of conduct and policies are identified?
	10	Remedy and Corrective Action: when issues are identified, does the company resolve them in the best interests of impacted workers?
WORKER EMPOWERMENT	11	Living Wages: does the company have a credible plan to ensure every worker in its supply chain is paid fairly?
	12	Worker Engagement: does the company invest in initiatives that train and empower workers?
	13	Freedom of Association: does the company support workers to bargain collectively to ensure their rights?
	14	Grievance Mechanism: does the company ensure workers can access mechanisms to safely raise concerns?
ENVIRONMENTAL SUSTAINABILITY	15	Fibre and Material Use: does the company prioritise the use of more sustainable fibre options?
	16	Water and Chemical Use: does the company ensure it uses and disposes of chemicals and water responsibly?
	17	Climate Impact: does the company have a credible plan to reduce the climate impact of its operations and supply chain?
	18	In-use and End-of-life Impact: does the company seek to reduce the environmental impact of its products while and after they are used?



Only one question (17.1) has had substantive change to its validation criteria, reflecting updates to the United Nations Fashion Industry Charter for Climate Action following COP26 in November 2021. These updates saw the threshold for climate action in the fashion industry increase to 50% by 2030, up from the previous agreement of 30%. All other changes were minor adjustments for clarity.

While the EFR Survey covers most key ethical issues that can emerge in fashion supply chains, some areas remain partially out of scope.

The focus is on the human rights of workers and their communities. Animal rights are intrinsically important. However, they are not addressed discretely in this research and are covered in sections where they have important crossovers with labour rights or broader environmental sustainability concerns, such as sustainable fibre use.

Some areas of the fashion industry's ethical impact are a result of the way the entire system functions. Cultures of overproduction and consumption, and the ways these feed into and are fed by fast fashion business models, are a key example. The survey does seek to cover specific actions that individual companies may take to mitigate these issues, such as considering circular design considerations (Question 18.1), consumer education initiatives (Question 18.2), and strategies to reduce over-production and its impacts

(Question 18.3). However, the focus on specific evidenced actions of companies that is central to the EFR methodology does not fully capture the cultural impact of fast fashion business models. The EFR is an element of our wider work, which includes community education and awareness-raising to address the impact of and alternatives to overconsumption.

WHO WE INCLUDE: COMPANY SELECTION

In 2022, 120 companies covering 610 brands were included in the scope of the EFR research. This consists of 93 companies that were included in the 2021 edition and 27 new companies.

Following selection criteria first introduced in 2020, the research seeks to include all companies that (1) own clothing or footwear brands operating in Australia or New Zealand; that (2) remain solvent; and (3) are estimated to have annual revenue in excess of AUD 50 million per annum (NZD 30 million for New Zealand companies).

As there is no publicly available list of companies that meet these criteria, they are identified based on prior inclusion in the EFR, information available from the Commonwealth Modern Slavery Register, desk-based research, and industry recommendations. As more companies meeting the criteria are identified, they are included in future research rounds.

Footwear

The 2022 report broadens the scope of companies to include any footwear brands that meet the overall criteria. This accounts for 15 of the new companies. While two of these companies had been included in reports prior to 2019, the remaining 13 are included for the first time this year.

Smaller companies

Some smaller companies—especially those that have been founded with an intentional ethical focus—provide strong examples of what good practice can look like and are great incubators of innovative approaches to ensuring worker rights and environmental sustainability. They can play a crucial role in driving change— both as an alternative and an example to larger fashion brands.

Their difference both in size and purpose means that their business models and ethical performance are not always directly comparable or translatable to larger mainstream companies. Along with the need to ensure a manageable cohort of companies for research, this informed the decision in 2020 to focus the EFR on companies that exceed a revenue threshold of AUD50 million (NZD30 million for New Zealand companies). Smaller companies included in previous EFR editions have the option to continue participation in the research. However, the differences identified above mean this cohort continues to become smaller.

HOW WE COLLECT AND ASSESS DATA: RESEARCH AND COMPANY ENGAGEMENT PROCESS

EFR research data was collected through an engaged research process between February and July 2022. Companies were initially provided with the survey along with a comprehensive Survey Support Document (included in the appendices to this report) that outlines expected standards for each question. EFR researchers met with companies, as requested, to ensure the expectations and rationale of the Survey were clear. This process both enables the research and contributes to the overall goal of this initiative: to set an agenda for tangible improvement in how the fashion industry operates.

Companies are required to submit their responses to each question, along with accompanying evidence, through an online research portal.

The data for companies newly included in 2022 received at least two comprehensive preliminary reviews by a dedicated researcher, based on an initial search of publicly available information in February/March and on any draft submissions made by the company in April (or a second scan of public information where no direct submission has been made). These preliminary reviews and accompanying outstanding questions from researchers are provided to companies, to ensure they have opportunity to respond and/or provide additional information.

A third full review then takes place based on the company's final submission by the end of May. At that point, companies may be contacted for clarifying information if their responses remain unclear/inconclusive. A second researcher then conducts a full independent review of each company's evidence to ensure accuracy and consistency, before their evidence is finalised and scored.

As the 2022 Survey is substantially unchanged from the previous year, companies assessed in 2021 were given the option of continuing to be assessed on the evidence provided last year or providing updated evidence for some or all survey questions. Where companies did make new or additional submissions, the questions for which new information was available were assessed following the same process described for new companies in the previous paragraphs. Where companies did not submit new or additional information for all or any individual question, the underlying score for those questions was carried over from the previous year—except for Question 171 which was reassessed as outlined earlier.

In 2022, 27 companies were assessed for the first time using the full survey; 61 companies provided updated or additional evidence to address some or all questions; and 32 companies' scores were calculated based on data from the previous year.



CERTIFICATIONS

Many of the companies included in the EFR use certification schemes to cover some parts of their supply chain for selected materials and/or processes. The EFR research process includes direct engagement with the most widely used of these certification schemes, namely Better Cotton, Fair Trade Australia New Zealand, Global Organic Textile Standard (GOTS), Ethical Clothing Australia (ECA), Cotton Australia, and Leather Working Group (LWG). In each case, the certifiers are invited to complete a survey response and submit evidence. Where a company can demonstrate that they are using one of these certifiers, credit for relevant questions is awarded based on the certifier survey evidence.

HOW SCORES ARE CALCULATED: ASSESSMENT AND WEIGHTING

A Yes/Partial/No grading system is employed for most questions and applied with reference to evidence thresholds set out in a detailed Survey Support Document provided to all companies at the start of the research period. A small number of questions use a percentage figure to award credit (e.g., percentage of supply traced).

Each section is given an overall weighting, as outlined in the table below.

POLICIES & GOVERNANCE	6%
TRACING & RISK	15%
SUPPLIER RELATIONSHIPS & HUMAN RIGHTS MONITORING	34%
WORKER EMPOWERMENT	25%
ENVIRONMENTAL SUSTAINABILITY	20%

Wherever relevant, the weightings for sections are further disaggregated to reflect measures taken at each supply chain stage.

Final stage production has the greatest weighting of any single stage of the supply chain, reflecting the reality that this is the stage where most fashion brands have direct relationships and the greatest leverage for change. However, given the increasing concentration of risk associated with raw materials and input production—both to human/labour rights and to environmental sustainability—more than half of the overall weighting is assigned to these earlier stages of the supply chain. To retain simplicity and as a proxy for the wider supply chain, at input and raw material stages companies are only required to report on the fibre or process that has the greatest labour rights materiality (either because of the inherent risk associated with that fibre/process, or due to the volume of total supply chain it represents).



TRANSLATING RESEARCH INTO BRAND SCORES

The most significant change in the 2022 EFR is the way the underlying research is translated into public information about the performance of individual companies and their brands.

The underlying score for each company and their associated brands is now the central piece of information provided. The number represents a score out of 100 and reflects companies' performance against the standard outlined in the EFR Survey. It provides greater transparency about the degree

of progress a company has made, and the extent to which it needs to work to improve its supply chain ethics. In doing so, it's clear that all companies—including those who perform relatively well—have some distance still to go.

Alongside the numeric score, company information is now presented inside a coloured circle. The colour of the circle represents the company's relative performance when considered against its peers. Companies are divided into quintiles with a royal blue circle representing a company that is in the top 20 per cent of all companies, a light orange circle representing a company that is in the bottom 20 per cent, and three shades showing those at steps in between, as shown below. The coloured shading reflects the approach of the previous A to F grading approach as it emphasises relative performance, but it is not directly comparable as it employs equal quintiles rather than the previous bell-curve distribution of grades.

WHY THE CHANGE?

Since the EFR was first published in 2013, awareness and understanding of issues in fashion supply chains has increased significantly—both among fashion companies and in the wider community. The simple A to F grade used in previous reports reduced complex information to a form that could be easily accessed and has contributed to improved understanding. As engagement has grown, so too has the demand for more detailed information about

how companies are performing, and what improvements they are making. This information has always been available in the data that underpins the EFR, but it hasn't been readily accessible in what was published.

By publishing the actual score that each company (and its associated brands) receives in the EFR survey, it is possible for both companies and individuals to get a clearer picture of how they are currently performing against the standard of the EFR survey. It also means it is easier to track improvements, as incremental positive changes that a company makes will be directly reflected in their score rather than only seeing change when the improvements are significant enough to jump a whole grade level, as was previously the case.

Importantly, this change is also about ensuring a clear message for individuals that is less susceptible to being misinterpreted. Relative grading information is useful as it helps companies and citizens alike to quickly see how brands compare with each other. The colours in the new scoring system still make this comparison readily apparent. However, relative information alone can mean that a company with a 'good grade' might be perceived to have already arrived at a place of great ethical practice. By pairing the colour with each company's underlying score the reality is more clearly demonstrated: every company has a long way to go, but some are making faster progress than others.

A 'good score' is not permission to stop thinking ethically and just go buy. It shows a company that is investing in making improvements and developing safeguards for the labour rights and environmental sustainability issues it faces in its supply chain—and being transparent about them. In this sense, it is a better option than a company with a lower score, but not necessarily a fully ethical purchase.

Through providing this greater level of transparency and showing performance against a standard, EFR 2022 provides both information as well as provocation to consider what needs to change to make the fashion industry work for its workers and for the planet.

PROVIDING INFORMATION ON COMPANIES' PERFORMANCE ON KEY QUESTIONS AND SECTIONS

As well as an overall result for companies, the EFR has historically published a breakdown of companies' performance in each of the five key sections of the survey. This information can still be found in this report, and like the overall result these are now numeric scores rather than grades. They continue to represent the aggregated score that the company received for the various questions that sit within that section.

On the Brand Finder website, a different approach has been taken. When considered outside the context of the full report, the aggregated

section information was not always easy to understand. What does a company's 'Worker Empowerment' result mean for example? Without context, it was difficult to understand that this covered whether companies are paying living wages; whether they are supporting worker-led initiatives to ensure workers understand their rights; whether they are supporting freedom of association in their supply chain, and whether they have mechanisms in place to ensure that grievances and concerns experienced by workers can be identified and addressed.

While the aggregate section results are here in this report, the web-based Brand Finder now highlights six Spotlight Issues. While not necessarily more important than other questions, they represent key areas of concern for the general community. The ratings provided for each are derived from the assessments that have been made of each company's response to the relevant question/s. Each of the six indicators have been explored in more detail in the earlier sections of this report, along with their interdependency with other areas of the survey. The questions drawn on, and the calculations behind these ratings, are detailed in the relevant sections throughout this report.

PUBLIC INFORMATION OR DIRECT DISCLOSURE?

Some companies' scores are followed by an asterisk (*). This means they have been assessed based on 'Public

Information Only.' This simply denotes the source of evidence for the company and does not in itself reflect their level of engagement. Some companies have highly developed ethical sourcing programs and maintain high levels of interaction with the research team but have chosen to only provide evidence through their public transparency initiatives. All evidence—whether disclosed publicly or provided directly to the EFR research team—is assessed using the same validation criteria.

Public transparency is important and the standard toward which we encourage all companies to work. Some companies assessed based on public information only may have additional measures in place, however their score remains an accurate reflection of their current transparency. The transparency is critical as the basis for informed citizen decisions and to enable accountability.

FOOTWEAR COMPANIES ASSESSED ON PUBLIC INFORMATION ONLY	44%
FOOTWEAR COMPANIES ASSESSED ON EVIDENCE SUBMITTED DIRECTLY IN ADDITION TO PUBLIC INFORMATION	56%

