

# Brand Performance Check TOTEME AB

# **Publication date: November 2023**

This report covers the evaluation period 01-05-2022 to 30-04-2023

### **About the Brand Performance Check**

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

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

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

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

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

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



# **Scoring overview**

Total score: 130 Possible score: 204 Benchmarking Score: 64 Performance Benchmarking Category: Good



### **Summary:**

Totême has shown progress and met most of Fair Wears' performance requirements. With a total benchmarking score of 64, the member is placed in the Good category.

Totême's sourcing strategy focuses on increasing influence through consolidation and long-term relations.

Totême conducts risk scoping and includes all risk factors for all its sourcing countries. The member has assessed the impact and prevalence of the risks correctly. Moreover, Totême has factory risk assessments for all its suppliers which include supplier-level monitoring to assess and understand the risks related to freedom of association (FoA) and gender specifically.



Totême worked on reorganising its planning strategy last year, where a collaborative approach with supplier input was key. As part of this, they started setting up a team specifically focused on planning and engaged in dialogue about planning with all its suppliers.

Totême also focused on responsible purchasing practices by initiating a living wage project. The brand started working on living wages with selected suppliers and focused on training responsible staff on living wages internally, as well as on training its suppliers by introducing the Fair Price App to two suppliers in Türkiye and China. Moreover, Totême started discussing open costing with all its main suppliers, which resulted in some suppliers sharing the labour cost component of their prices.

Fair Wear advises Totême to continue working on defining its living wage projects and its collaborative planning process. Moreover, the brand is encouraged to be more comprehensive and include a gender lens and more steps to promote FoA and effective social dialogue in its follow-up actions. Finally, the brand can expand its focus by integrating internal grievance mechanisms into its social dialogue action plans.

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



## **Performance Category Overview**

**Leader**: This category is for member companies who are doing exceptionally well, and are operating at an advanced level. Leaders show best practices in complex areas such as living wages and freedom of association.

**Good**: It is Fair Wear's belief that member companies who are making a serious effort to implement the Code of Labour Practices—the vast majority of Fair Wear member companies—are 'doing good' and deserve to be recognized as such. They are also doing more than the average clothing company, and have allowed their internal processes to be examined and publicly reported on by an independent NGO. The majority of member companies will receive a 'Good' rating.

**Needs Improvement**: Member companies are most likely to find themselves in this category when major unexpected problems have arisen, or if they are unable or unwilling to seriously work towards CoLP implementation. Member companies may be in this category for one year only after which they should either move up to Good, or will be moved to suspended.

**Suspended**: Member companies who either fail to meet one of the Basic Requirements, have had major internal changes which means membership must be put on hold for a maximum of one year, or have been in Needs Improvement for more than one year. Member companies may remain in this category for one year maximum, after which termination proceedings will come into force.

Categories are calculated based on a combination of benchmarking score and the percentage of own production under monitoring. The specific requirements for each category are outlined in the Brand Performance Check Guide.



# **Company Profile TOTEME AB**

#### **Member company information**

Member since: 1 Jan 2021 Product types: Garments, clothing, fashion apparel, Bags, Accessories, Footwear and Sunglasses Percentage of CMT production versus support processes 74% Percentage of FOB purchased through own or joint venture production 0% Percentage of FOB purchased directly 56% Percentage of FOB purchased through agents or intermediaries 57% Percentage of turnover of external brands resold 0% Are vertically integrated suppliers part of the supply chain? Yes FLA Member No Member of other MSI's GOTS, RWS (responsible wool standard), Number of complaints received last financial year o

### **Basic requirements**

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



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

Production Country	Number of production locations	Percentage of production volume
China	9	44
Italy	25	29
Romania	2	10
Türkiye	2	8
Portugal	7	6
Lithuania	1	3
Spain	1	1



# Layer 1 Foundational system's criteria

### Possible Points: 8 Earned Points: 8

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

**Comment:** Totême has a Responsible Business Conduct Policy, but some elements need improvement such as the gender lens and the operationalisation of Totême's Human Rights Due Diligence (HRDD) and its support of social dialogue structures.

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

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

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

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

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

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



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

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

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



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

### Possible Points: 90 Earned Points: 62

#### **Indicators on Sourcing strategy**

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

**Comment:** Totême has a sourcing strategy addressing influencing labour conditions. The member has 47 active suppliers. 73% of the production volume comes from suppliers where the member has at least 10% leverage at suppliers. 11% of the production volume comes from suppliers where Totême buys less than 2% of its total FOB. The member added more tail-end suppliers because it implemented new product categories. Totême's sourcing strategy explicitly focuses on increasing influence through consolidation, but not yet on active cooperation with other clients.

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



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

Comment: Totême has a sourcing strategy that focuses on maintaining long-term relationships. 50% of the member's total FOB volume comes from suppliers with whom Totême has a business relationship for at least five years.

In the previous financial year, the member has drafted contracts for its main suppliers which range for five years with a three-year renewal period and a six-month notice period. Approximately 73% of its main suppliers have signed the contract, and Totême is still discussing the contract's specifications with its other main suppliers. Totême is not aware what kind of contracts its main suppliers have with their subcontractors.



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

**Comment:** Totême conducts risk scoping and includes all risk factors: country, sector, business model, sourcing model and product level. Totême uses the Fair Wear platform to assess risks on a country- and sector level, and conducted a materiality assessment which also looked at business model, sourcing model and product level risk factors. In its risk scoping, the member has assessed the impact and prevalence of the risks correctly, except for Italy, where Totême did not identify living wages and legally binding employment relationships as risks even though the brand works with many subcontractors there.

The risk scoping includes a gender lens. The member particularly looks at discrimination (discrimination in hiring practices, differences in wage levels and/ or employment terms), health and safety (sexual harassment and gender-based violence), living wages (differences in wage levels based on gender) and legally binding employment relationship (maternity leave as per legal standards).



Input from workers, suppliers, and stakeholders is included in the risk scoping by using the Fair Wear risk scoping tool which includes worker and stakeholder input. Moreover, the brand includes information from audit reports, information collected through physical presence in its production locations and data from the media and other internationally recognised human rights organisations in the risk scoping. Additionaly, the materiality assessment Totême conducted includes a Stakeholder Engagement Plan in which the brand actively involves stakeholders like direct suppliers, employees and NGO's by requesting feedback.

The member adjusts its sourcing strategy based on the risk scoping, as outcomes of the scoping are included in decision-making regarding adding new production countries. For example, after an initial risk scoping, the member decided against onboarding a new supplier which was in a production country the member does not yet source from, as it found there were too many risks associated with adding that country as a new production country.

To date, Totême's sourcing strategy does not mention a preference for countries where workers can freely form or join a trade union and/or bargain collectively. Totême sources from 'Grouping 1 & 2' countries (countries that are identified by Fair Wear as being limited in possibilities of progressing freedom of association and collective bargaining) and wants to retain its list of active sourcing countries.

**Recommendation:** Fair Wear strongly recommends Totême to privilege countries where workers can freely form or join a trade union and/or bargain collectively and make this explicit in its sourcing strategy.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.4 Member company engages in dialogue with factory management about Fair Wear membership requirements before finalising the first purchase order.	Intermediate	Sourcing dialogues aim to increase transparency between the member and the potential supplier, which can benefit improvements efforts going forward.	Process outline to select new factories; Material used in sourcing dialogue; Documents for sharing commitment towards social compliance; Meeting reports; On-site visits; Reviews of suppliers' policies.	2	4	0



**Comment:** It is the standard process for Totême to inform new suppliers about Fair Wear membership by sending the supplier questionnaire which includes the Code of Labour Practices (CoLP), and its Supply Agreement which outlines its social and environmental commitments. Suppliers need to sign both before the sampling process starts. This process has been followed for all 9 suppliers added last year.

However, the brand has not yet had a dialogue with its suppliers about Fair Wear's requirements and how to cooperate in implementing them. Totême organises meetings with suppliers who have questions regarding the contents of the supplier questionnaire and/ or the Supply Agreement, but a dialogue on the Fair Wear requirements is not yet part of its standard procedure.

**Recommendation:** Fair Wear recommends that Totême engages in a dialogue with the supplier about Fair Wear requirements and how to cooperate in implementing these.



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

**Comment:** Totême collects human rights information of potential new suppliers by collecting existing audit reports, organising factory visits during which it conducts health and safety self-assessments, and signed copies of the Sustainability Agreement and Fair Wear questionnaire.

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



Totême has not followed the above process for the Chinese suppliers added in the last previous year because it could not conduct factory visits due to COVID-19 regulations. The brand is looking into options to mitigate this issue in the future, by for example organising video calls or having its agents visit new production locations prior to production.

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

Fair Wear strongly recommends Totême to privilege suppliers where workers can freely form or join a trade union and/or bargain collectively and make this explicit in its sourcing strategy.

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



**Comment:** In the previous financial year, Totême has added nine new suppliers. Totême has shared information about Fair Wear's CoLP and the complaints helpline within the first year of doing business. The Worker Information Sheet has been posted at all new production locations. Totême has not yet organised onboarding sessions for its new suppliers to raise awareness about the Fair Wear CoLP, the complaints helpline, or the importance of social dialogue.

**Recommendation:** Totême is recommended to organise onboarding sessions specifically focusing on the CoLP and the complaints mechanism within the first year of doing business. Totême is recommended to ensure that women workers and workers from other marginalised groups can participate in discussions in the onboarding sessions.

### Indicators on Identifying continuous human rights risks

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

**Comment:** Totême has a systematic approach to identifying human rights risks in its supply chain and has assessed the risks for each production location. It has determined the appropriate monitoring tool and frequency per country. For instance, the brand made an audit strategy for its suppliers in China, Türkiye, and Romania based on its risk scoping exercise.

The company conducts audits, factory visits and desktop research to monitor risks. It requires all its main suppliers and subcontractors in China to be audited regularly, but the brand has many subcontractors in Italy for which it does not require audits as most have a low-risk level. The brand does visit its Italian subcontractors and gave two of them a higher risk level based on information regarding discrimination it received during a self-assessment. Totême uses the Fair Wear risk assessment tool to update its supplier-level risk assessments systematically.



Totême would like to implement Fair Wear audits for all its suppliers with a higher risk level, but as it does not want to impose too many audits on its suppliers it still also collects external audits. It initiated two additional Fair Wear audits for Chinese suppliers during the previous financial year. Totême crosschecks the audit findings from external audits with information from the Fair Wear country study and uses both as input for its risk assessments.

Input from workers, suppliers, and other stakeholders is included through the Fair Wear audits, and also through the audits conducted by external parties. The worker input feeds back into the member's monitoring tool.

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

**Comment:** Totême has mapped the risks to Freedom of (FoA) in all its sourcing countries and can explain the main risks per country. Examples of the highest risks identified are 'existing Trade Unions or worker representatives are not involved in improving working conditions', 'workers cannot freely form or join the union of their choice' and 'management mistreats workers due to their union membership or activities'. The company identified China, Türkiye and Romania as countries in which risks to FoA exist. The company looked at Fair Wear's gender fact sheets for these countries to collect information on the main FoA risks to women workers, but has not yet included this information in its risk assessments.

Totême uses this information to understand what the risks at its suppliers are and inform itself how to engage with its suppliers on this topic. The member has supplier-level monitoring in place to assess and understand the risk at suppliers, which it assesses through audits, supplier dialogue and by looking at worker committee meeting minutes when applicable. Additionally, the member has started mapping which suppliers have trade unions and CBAs in place.



**Recommendation:** Totême should include risks specific to women workers in its risk assessment regarding FoA at its suppliers.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.9 Member company includes a gender analysis throughout their continuous monitoring of human rights risks, to foster a better understanding of gendered implications.	Intermediate	Investing in gender equality creates a ripple effect of positive societal outcomes. Members must apply gender analyses to their supply chain to better address inequalities, violence, and harassment.	Evidence of use of the gender mapping tools and knowledge of country-specific fact sheets.	4	6	ο

**Comment:** Totême has included gender in its risk scoping. The member could show it understands the basic gender risks for its sourcing countries, and for instance, identified discrimination in hiring practices, wages and/ or employment terms as potential risks in Italy. Additionally, Totême actively collects gender data per factory. Data it collects are the gender ratio of workers and the gender ratio of higher management. This information is collected through a yearly survey. Totême has started to generally analyse the collected genderdisaggregated data, but has not done factory-level analyses yet. The main conclusions (so far) are that even though there are mostly female workers employed in the brand's supply chain, the majority of male employees are employed in high(er) positions. The member has not yet analysed how its business practices affect gender at its suppliers.

**Recommendation**: Fair Wear recommends the member to start analysing the gender data collected at country and factory levels and connect them. Fair Wear's gender instruments can be helpful.

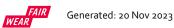


Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.10 Member company considers a production location's human rights performance in its purchasing decisions.	Advanced	Systematic evaluation is part of continuous human rights monitoring. A systematic approach to evaluating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

**Comment:** Suppliers' human rights performance is evaluated systematically every year. Together with the Product and Production teams, the CSR department ranks its suppliers annually on different indicators related to human rights. Totême has a strong and systematic evaluation system for assessing suppliers' human rights performance. It works with a predefined framework in which specific, measurable indicators are linked to a score to create consistent evaluation reports per supplier.

The brand systematically integrates the outcome of this evaluation into its purchasing decisions. It links the outcome of the evaluation to supplier improvement plans, and has a phase-out procedure in place for suppliers that do not improve in a set timeframe. Totême shares the outcome of the evaluation with its suppliers, but not yet with worker representatives.

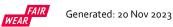
Recommendation: Fair Wear recommends Totême to share and discuss the outcome of the supplier evaluation with worker representatives as well.



Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.11 Member company prevents and responds to unauthorised or unknown production and/or subcontracting.	Intermediate	Subcontracting can decrease transparency in the supply chain and has been demonstrated to increase the risk of human rights violations. Therefore, when operating in higher-risk contexts where it is likely subcontracting occurs, the member company should increase due diligence measures to mitigate these risks.	Production location data provided to Fair Wear, financial records from the previous financial year, evidence of member systems and efforts to identify all production locations (e.g., interviews with factory managers, factory audit data, web shop and catalogue products, etc.), licensee contracts and agreements with design collaborators.	2	4	0

Comment: Totême uses the outcomes of its human rights monitoring to respond to unauthorised subcontracting. There is no evidence of missing first-tier locations in the database. Additionally, the member actively prevents unauthorised subcontracting by occasionally visiting suppliers during production, adding a clause on production location transparency to its supplier agreements, and by conducting quality control during and after production. No subcontractors were missing in the database.

**Recommendation:** Totême is recommended to visit production locations systematically during production.



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

Comment: Totême has identified whether homework is prevalent in its sourcing countries.

Totême knows which suppliers use homeworkers and started collecting information such as whether homeworkers are under contract and proof of payment to assess if there is a risk of exploitation or not. The member has yet to determine that its suppliers take measures to source responsibly from homeworkers, based on full payment information and terms of employment. The brand is still in the process of verifying the collected data.

**Recommendation:** Totême is recommended to ensure suppliers that work with homeworkers do so in a responsible way.

### **Indicators on Responsible purchasing practices**

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



**Comment:** Totême uses contracts with its suppliers. The member has agreements in the form of Supply Agreements and separate purchase orders that stipulate terms of payment, liability and penalties.

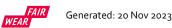
In case of late deliveries the contract stipulates that the party responsible for the delay will bear financial responsibility. In case the supplier is at fault, the member has the right to a discount. However, Totême has not enforced such penalties. The contract outlines the shared responsibilities of Code of Labour Practices implementation, and collaborating on monitoring and remediation are part of that.

Although the contract includes the Code of Labour Practices, the contract itself does not support the implementation of human rights due diligence. An unequal burden is placed upon suppliers by holding the supplier financially responsible for defects without proof of fault. Moreover, the contracts stipulate a payment term of maximum sixty days upon goods being loaded on the vessel, although the brand has a payment term of thirty days upon goods being loaded on the vessel with most suppliers and also has pre-pays for some of its suppliers.

The contracts have a duration of five years with a three-year renewal period and can be terminated by both parties with six months' notice. Totême is not aware of the contracts of its suppliers that are paid via an intermediary.

Requirement: Totême should evaluate its contracts to ensure that it does not place an unequal burden on its suppliers or include terms that limit the possibility of implementing the Code of Conduct. Fair Wear strongly recommends that Totême adapts the clause on damages, and proof of fault needs to be demonstrated before the supplier is held accountable for defects.

Recommendation: In its contracts with suppliers, Totême could ringfence labour costs to prevent negotiations from negatively affecting wages.



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

**Comment:** Totême actively shares relevant CSR information with other departments.

There is an active interchange of information between CSR and other departments to enable coherent and responsible business practices. Sourcing and purchasing staff work with KPIs supporting good sourcing and pricing strategies. Examples of these KPIs are:

Achieving 100% supply chain traceability by 2025 Eliminate the use of hazardous chemicals by 2030 Pay living wages across the supply chain by 2030



Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.15 Member company's purchasing practices support reasonable working hours.	Intermediate	Members' purchasing practices can significantly impact the levels of excessive overtime at factories.	Proof that planning systems have been shared with production locations, examples of production capacity knowledge that is integrated into planning, timely approval of samples, and proof that management oversight is in place to prevent late production changes.	4	6	0

**Comment:** During 2022, Totême focused on improving its production planning system. The member worked on improving its purchasing practices and asked its suppliers for feedback on their process. This is an ongoing project, the brand is currently onboarding a new team solely dedicated to planning to materialise this further.

Every year, Totême asks its suppliers for capacity. Based on this information and the brand's general knowledge about standard minute per style, it does its planning twice a year per season. The brand works with forecasting, which it shares with its suppliers seven months before production takes place. Forecasting is done based on adding predicted growth to numbers from the previous seasons. Because of Totême's growth, it has been difficult for the brand to estimate order quantities. Final purchase orders are made in consultation with suppliers and placed five months in advance. Final purchase orders sometimes have to be altered due to last-minute design changes. The brand is working with stricter deadlines to prevent this from happening in the future.



The brand keeps stock on hand and sometimes makes use of air freight to avoid putting pressure on the factory in case of delays. Moreover, the brand also informs its suppliers in a timely manner in case of fabric delays so the supplier can adjust its planning accordingly.

Totême had some findings on excessive overtime in the previous financial year, which it followed up on by discussing the planning process with all its suppliers. The brand visited all its main suppliers in China to discuss this in person. Afterwards, Totême committed to longer lead times and is switching to part delivery to relieve pressure from its suppliers.

**Recommendation:** Fair Wear recommends the member to explore planning production in minutes instead of pieces to assess better its suppliers' production capacity (and wage levels). Furthermore, at suppliers where Totême is not a large customer, Fair Wear recommends the member to learn more about their production planning, for example, about peak season. Fair Wear also encourages the member to improve the accuracy of its forecasting further and evaluate with suppliers whether the lengthened lead time indeed alleviates production pressure.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.16 Member company can demonstrate the link between its buying prices and wage levels at production locations.	Basic	Understanding the labour component of buying prices is an essential first step for member companies towards ensuring the payment of minimum wages - and towards the implementation of living wages.	Interviews with production staff, documents related to member's pricing policy and system, buying contracts, cost sheets including labour minutes.	2	6	ο

**Comment:** Totême has a basic understanding of the wage levels at its suppliers and connects this understanding to its own buying prices. Totême initiated a living wage project in 2022 and started working on living wages with selected suppliers. Internally the brand focused on training responsible staff on living wages. Totême started to use the Fair Price App with one supplier in Türkiye, and one in China. Moreover, it started discussing open costing with all its main suppliers, but not all main suppliers share the labour cost component of prices yet.

Other than for the suppliers which work with the Fair Price App, Totême has no insight into the labour component of its prices. Totême does not know the number of actual sewing minutes needed for a style. Totême knows the labour minute value at some of its suppliers.



#### Totême includes changes in legal minimum wage or inflation in its buying prices.

Recommendation: Totême is recommended to investigate why some suppliers are reluctant to work with Fair Price or any other form of fact-based costing, if needed, with the support of Fair Wear's local teams. Fair Wear further recommends Toteme to look into the sewing minutes per style, together with its suppliers.

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

Comment: Totême has informed its sourcing intermediaries of Fair Wear requirements and could show they informed production locations. Totême works with nine intermediaries in total, four agents and five main suppliers. The intermediaries actively support the implementation of the CoLP by actively being involved in the continued communication on prevention and remediation. Moreover, Totême's agents conduct health and safety checks in the brand's production locations. Totême conducts health and safety checks for its sub-contractors itself. Totême has discussed the Common Framework of Responsible Purchasing Practices (CFRPP) with its intermediaries, but has not yet started to check whether its intermediaries uphold the purchasing practices as mentioned in the (CFRPP) by for example checking whether its intermediaries have fair prices and timely payments.

**Recommendation:** Totême could require its intermediaries to uphold the purchasing practices mentioned in the CFRPP framework.



### **Layer 3 Remediation and impact**

### **Possible Points: 92 Earned Points: 52**

### Indicators on Quality and coherence of prevention and remediation system

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

**Comment:** Based on the risk identification as described in chapter two, Totême has linked factory risks to follow-up for factories covering all of its suppliers. The member uses the Fair Wear platform to connect its risk assessments and audit findings to time-bound actions per factory and prioritised countries that fall under the enhanced monitoring programmes.

For instance, in China, Totême concentrates its efforts on addressing issues like excessive overtime, living wages and restricted freedom for workers to associate. Furthermore, Totême goes beyond addressing Corrective Action Plans (CAPs) for specific factories based on the risk analysis.



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

**Comment:** Totême has partially included a gender lens in its improvement and prevention programmes. The member brand discussed maternity leave with some of its suppliers but has yet to create gender-specific actions.

**Recommendation:** The member is encouraged to include a gender lens in all its improvement and prevention actions.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.3 Member company's improvement and prevention programmes include steps to encourage freedom of association and effective social dialogue.	Basic	Freedom of Association and Collective Bargaining are enabling rights. Therefore, ensuring they are prioritised in improvement and prevention programmes can help support improvements in all other areas.	Available prevention and improvement programmes, including stakeholder input.	2	6	0

**Comment:** Totême included some steps to encourage freedom of association (FoA) and effective social dialogue in its improvement or prevention actions. These steps are discussing the importance of democratically elected worker representatives with some of its Chinese suppliers, including its agents in setting up an action plan addressing social dialogue, and implementing training which includes a module on social dialogue at one of its Chinese suppliers after which the factory updated its policy on internal social dialogue structures. Totême also asks its suppliers to include worker representatives in audit follow-up and to involve worker representatives in meetings during factory visits when applicable. If there is no worker committee, the brand discusses the options of organising social dialogue with the factory management during its visit.



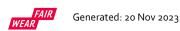
The member has yet to apply a gender lens and ensured its steps to promote FoA and effective social dialogue address the specific risks for female workers.

**Recommendation:** Totême is recommended to, together with the supplier, distribute non-retaliation letters to workers, ensuring workers know they will not be punished for joining or forming trade unions.

Fair Wear recommends Totême to be more comprehensive and include more steps to promote FoA and effective social dialogue in its improvement and prevention actions.

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

**Comment:** Totême does not yet assess its suppliers' internal grievance mechanisms at the start of a business relationship. As such, Totême does also not actively support and monitor the effectiveness of internal grievance mechanisms.



**Requirement:** Totême needs to assess the existence and functioning of internal grievance mechanisms systematically; it also needs to support and monitor its functioning.

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

**Comment:** Totême cooperates with other Fair Wear members at its shared suppliers, responding to CAPs and complaints and working together on living wage projects. At suppliers that are not shared with other members, Totême works together with other customers. The brand collaborates on information sharing by exchanging information on supplier- and country-level risks.

Next to that, the member also cooperates in taking more preventive measures, such as joint living wage work. Moreover, the member also connected two of its suppliers in the same region of Türkiye to collaborate on living wage work so they can mutually support each other.

### **Indicators on Improvement and prevention**

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.6 Degree of progress towards implementation of improvement programme per relevant factory.	60%	Fair Wear expects members to show progress towards the implementation of improvement programmes. Members are expected to be actively involved in the examination and remediation of any factory-specific problem.	Progress reports on improvement programmes.	4	6	-2



**Comment:** In the past financial year, Totême has received five audit reports. During the performance check, the member could demonstrate with a sample that close to two third of the CAP issues requiring improvement actions have been followed up. Examples of improvement actions that were taken include health and safety improvements like replacing fire fighting equipment, as well as remediating legal non-compliances like updating employment contracts to comply with national laws and making sure overtime premiums were paid in accordance with legislation.

The CAP issues that require improvement actions and are still open are issues that are more complex or structural, and therefore need more time to be remediated. The brand also has open issues at a supplier for which it did collect an external audit, but where it did not initiate any follow-up as the brand is exiting the supplier.

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

**Comment:** Totême has identified some root causes of the CAP issues and discussed these with its suppliers. The member has implemented some preventive steps, for instance it improved its planning process to address excessive overtime issues, and started working on educating itself on living wages and solidifying internal commitment to increase prices to address this topic. Even though the member has delved into root causes for excessive overtime and living wages (assessed under indicators 3.9 and 3.11 respectively) Totême has yet to look into root causes for other CAP issues.

**Recommendation:** Fair Wear recommends Totême to identify root causes of CAP issues together with its suppliers.



Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.8 Member company validates risk profile and maintains regular dialogue with factories where no improvement or prevention programme is needed.	Intermediate	When no improvement or prevention programme is needed, Fair Wear expect its member companies to actively monitor the risk profile and continue to mitigate risks and prevent human rights abuses.	Use of Fair Wear workers awareness digital tool to promote access to remedy. Evidence of data collected, worker interviews, monitoring documentation tracking status quo.	4	6	0

**Comment:** Totême has some suppliers where follow-up steps are not needed. These cover 38% of the member's total FOB. These suppliers include its suppliers located in Portugal, Lithuania and some of its Italian suppliers. The member has a system to ensure possible human rights risks are regularly discussed with these suppliers. Totême regularly reviews changes to the risk situation. The brand regularly collects external audits and evaluates these suppliers yearly on potential risks and social compliance during its standard supplier evaluation process, which it likewise discusses yearly with its suppliers.

The member has yet to include worker representatives/local unions in discussions with factory management on possible human rights risks.

Recommendation: Totême is recommended to ensure worker representation/local unions (when appropriate) are included in discussions with factory management on possible human rights risks.



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

**Comment:** In the previous year, three audit reports of the total five audits mention excessive overtime.

Totême analysed the root causes of these findings. According to the member, planning (both its own and the factory's internal planning) and material delays are a significant cause for excessive overtime. The member has addressed this and promotes transparency about working hours by engaging in dialogue with its suppliers, and introducing the Fair Price App to one supplier which was reluctant to share working hour and wage data.



The member has taken action to address the root causes. Totême set up an internal planning team to improve its planning process. It also initiated dialogue about planning with all its main suppliers to collaboratively work on improving production planning from both sides. Moreover, the brand prioritises its communication on changes in the production process (for example caused by material delays) by communicating them as soon as possible and by engaging in discussions about order prioritisation to support suppliers in adjusting its planning.

Totême could show that its efforts resulted in reduced excessive overtime at one supplier, even though not all excessive overtime findings were fully remediated yet.

**Recommendation:** Fair Wear advises Totême to discuss with its supplier which (other) solutions included in the No excessive overtime guide (formerly known as Fair Working Hours Guide) are applicable.

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

**Comment:** In the previous year, three out of five audits included findings regarding non-payment of legal minimum wage/ legally required wage elements. For one audit, most findings regarding legally required wage elements were improved except for one related to entitled annual leaves for piece-rate workers. The other audit included findings on insurance (social security), annual leave and overtime premiums not being paid as legally required. In the previous year, no audits included findings regarding failure to provide wage data.



Totême responded immediately to these findings by discussing them with its suppliers, both in monthly meetings as well as during a factory visit. The supplier agreed to remediate the findings and implement a new audit to verify the progress. The suppliers shared proof of payments with Totême, which its agent in China checked for them. However, as some of its Chinese suppliers do not yet have a wage system in place to compare workers' gross wages with hourly wages, Totême could not yet show that all due wages were compensated. Totême has not yet included workers' representation in finding a solution to these findings.

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

**Comment:** Totême has yet to create an overall overview of the wage levels at its suppliers and the gap towards the estimated living wage. The brand has a basic overview of the wage levels at all of its suppliers, and an in-depth overview of the wage levels at some of its suppliers. Totême discusses the topic of wages with all of its suppliers. Totême understands which suppliers pay wages below living wage estimates as a consequence of the member's policies/actions. Totême followed up on this and reviewed internally how the member's practices such as its price setting could be altered and ensured this was done for one of its suppliers in Türkiye.



The member has yet to develop a systemic and time-bound approach to get wages increased towards a living wage for the rest of its suppliers where living wages are not yet being paid.

**Recommendation:** Fair Wear encourages Totême to get an in-depth overview of its suppliers wage levels and look at mode wages to make its living wage calculations, instead of average wages. Moreover, Fair Wear highly encourages the brand to verify whether collective bargaining agreement (CBA) wages are being paid at its suppliers with a CBA in place.

Fair Wear encourages Totême to involve worker representatives and local organisations in assessing root causes of wages lower than living wages. It is advised that the outcomes of the root cause analysis are discussed internally and with top management, to form a basis for an embedded strategy.

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

**Comment:** Totême has started to address the topic of living wage internally, by setting up and getting top-management support for a living wage project aiming to cover all suppliers by 2030. The member has discussed wage increases with its factories.

Totême has a strategy on how to finance wage increases at its suppliers and is planning to increase its prices using its margin. Totême has started analysing the costs of financing wage increases across its supply chain but does not yet have an overview of prospected costs. Totême has worked with its suppliers to set a target wage at one selected supplier in Türkiye, which started using the Fair Price App.

Totême is still working on its living wage project and has an ad-hoc plan regarding how to finance wage increases across its supplier base.

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



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

**Comment:** Totême uses fact-based costing (the Fair Price App) to ensure its prices support the payment of a living wage estimate at one Turkish supplier responsible for less than 1% of Totême's FOB.

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

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



**Comment:** Totême received no complaints in the past financial year.

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

**Comment:** Totême has some CAP findings where training is a recommended follow-up action. The member has enrolled all of its suppliers with audit findings on no or low awareness about the Code of Labour Practices and/ or Fair Wear's grievance mechanism in WEP Basic modules.

The member has not yet enrolled its suppliers with potential risks of no or low awareness about the Code of Labour Practices, Fair Wear's grievance mechanism and/ or social dialogue structures in any training modules.

Even though it is not part of a CAP, Totême has implemented the FairPrice Introduction Training at two suppliers in China, on itemising the labour cost component for living wages.

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



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

**Comment:** Totême followed up on all training results by discussing the training reports with its suppliers, as well as discussing how worker representation committees could be set up within the factory. For the FairPrice Introduction Training, the member is supporting its suppliers in uploading data into the app. Additionally, the member used the results of the training as input for its human rights risk monitoring, by adjusting its risk assessments according to the input it received from the training and subsequent dialogues.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.17 The member company's human rights risk monitoring system includes a responsible exit strategy.	Intermediate	Withdrawing from a non- compliant supplier should only be the last resort when no more impact can be gained from other strategies. Fair Wear members must follow the steps as laid out in the responsible exit strategy.	Exit strategy policy, examples of supplier communications.	2	4	0



**Comment:** Totême's human rights risk monitoring includes a responsible exit strategy. In the past financial year, the member stopped with two suppliers.

The member followed the steps in the responsible exit strategy for one of these suppliers, but not the other. For its Portuguese supplier, where it originally had high leverage, the member followed a phase-out period of 1.5 years during which it gradually reduced its order quantity. Totême communicated the decision to leave the factory at the beginning of this process and discussed the responsible exit strategy with the supplier as part of this discussion. The brand followed up with top management after the termination process was concluded. Totême did not have access to social dialogue structures during its business relationship with this supplier nor during the termination process.

For the Chinese factory Totême exited, the brand did not discuss the responsible exit strategy nor the phase-out plan with the supplier as communication with the supplier was one of the main reasons for exiting this factory. Totême had low leverage at the supplier (1%) and one of the reasons for the exit was consistent issues regarding communication and cooperation on CAP follow-up. Totême communicated the exit one year in advance and believes the impact of its exit was small due to their low leverage. Totême did not have access to social dialogue structures during its business relationship with this supplier nor during the termination process.

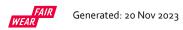
Totême did not discuss the responsible exit strategy with all of its suppliers yet.

**Recommendation:** Totême could discuss the responsible exit strategy with its suppliers, for instance as part of its supplier evaluation or it could include the responsible exit strategy as part of its suppliers' agreement or contract.

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



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



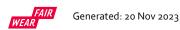
# Layer 4 External communication, outreach, learning, and evaluation

### Possible Points: 22 Earned Points: 16

#### **Indicators on Communication, transparency and evaluation**

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.1 Member company actively communicates about Fair Wear membership and its human rights due diligence efforts.	Intermediate	Fair Wear membership includes the need for a brand to show its efforts, progress, and results. Fair Wear members have the tools and targeted content to showcase accountability and inform customers, consumers, and retailers. The more brands communicate about their sustainability work, the greater the overall impact of the work of the Fair Wear member community.	Member website, sales brochures, and other communication materials.	2	4	0

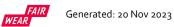
**Comment:** Totême communicates accurately about Fair Wear membership on its website. The member also uses other channels to inform customers and stakeholders about Fair Wear membership. By sharing general information on Fair Wear with its vendors, Totême actively spreads the Fair Wear message.



**Recommendation:** Totême could share the Fair Wear third-party resellers flyer with its vendors. The flyer can support in explaining Fair Wear, Fair Wear's work and the communication rules for third parties (outlined in the "Communication by resellers" part of the Member Communication Guide & Policy 2022).

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

**Comment:** Totême does not sell external brands.



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

#### **Comment:** Totême AB has submitted its social report, which Fair Wear approved. Totême has also published the report on its website.

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



**Comment:** Totême does not report on factory-level data and remediation results.

**Recommendation:** Fair Wear recommends Totême to publish time-bound plans for its suppliers.

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

Comment: Totême has a system to track progress and check if implemented measures have been effective in preventing and remediating human rights violations. The internal evaluation system involves top management. The member has yet to include feedback from workers or other local stakeholders in production countries in its internal evaluation system.

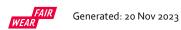
**Recommendation:** The member is advised to include feedback from workers and suppliers in its evaluation system.



Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.6 Level of action/progress made on requirements from previous Brand Performance Check.	Advanced	In each Brand Performance Check report, Fair Wear may include requirements for changes to management practices. Progress on achieving these requirements is an important part of Fair Wear membership and its process approach.	Member should show documentation related to the specific requirements made in the previous Brand Performance Check.	4	4	-2

**Comment:** The previous performance check included the following requirement: 'Totême needs to demonstrate an understanding of the link between buying prices and wage levels, to ensure their pricing allows for the payment of the legal minimum wage.

Totême followed up the requirement by starting to use the Fair Price App and by starting to discuss open costing models with all main suppliers. Internally, the brand educated itself on responsible purchasing practices and living wage methodology.

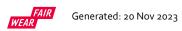


## **5** Appreciation chapter

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

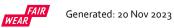
5.2 Member company actively participated in lobby and advocacy efforts to facilitate an enabling environment in production clusters.: Not applicable

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



## **Recommendations to Fair Wear**

Totême feels that the new Fair Wear Member Hub which facilitates Human Rights Due Diligence (HRDD) is a step in the right direction. The brand recommends Fair Wear to use this platform to stay agile and represent the fast-moving industry realities and not become an overly administrative tool.



## **Brand Performance Check details**

Date of Brand Performance Check: **11-10-2023** Conducted by: **Maaike Rubenkamp** Interviews with: Johanna Andersson, CEO Lisa Holmquist, Production Manager Marie Ragnar, Head of Accounting Linda Gustafsson - Sustainability Director Andrea Forssman - Sustainability Specialist

