



# **Brand Performance Check**

**Zeeman textielSupers BV**

**Publication date: October 2023**

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

# About the Brand Performance Check

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

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

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

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

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

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

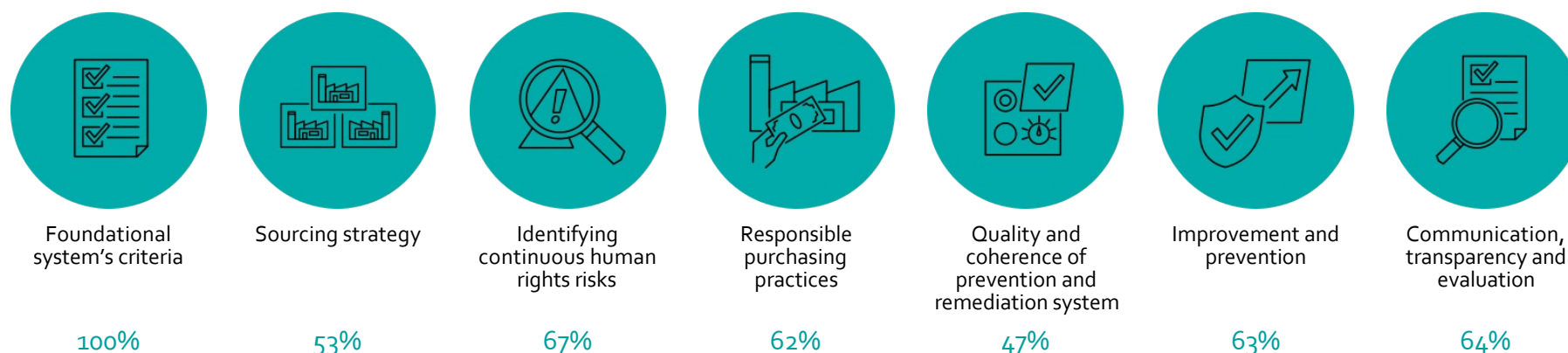
# Scoring overview

Total score: 116

Possible score: 196

Benchmarking Score: 59

Performance Benchmarking Category: Good



## Summary:

Zeeman textielSupers BV (Zeeman) has met most of Fair Wears' performance requirements. With a total benchmarking score of 59, the member is placed in the Good category.

2022 was a difficult year for Zeeman. There were international supply chain disruptions because of COVID-19, the war in Ukraine, rising energy prices, and great pressure on prices overall. Zeeman's strategy includes offering products at the lowest possible price. Because of the changing context, it had to change the prices for some of its products for the first time in a long time. This required a close evaluation of Zeeman's supply chain, products, strategy, and mission. In 2023, Zeeman will introduce a new strategy that focuses on improving people's lives by offering products for the lowest possible price.

In 2022, Zeeman adjusted its policies and processes to align with Human Rights Due Diligence. It introduced its two-way code of conduct, which combines Zeeman's expectations of its production locations regarding labour conditions with making explicit what production locations can expect of Zeeman regarding production planning and prices. Based on its country risk scoping, Zeeman also developed country-specific risk declaration forms, which each production location must fill out. This form is based on the Fair Wear Code of Labour Practices but highlights country-specific risks and asks for more detailed information from production locations.

In 2022, Zeeman expanded its work on living wages to more production locations, following the company's living wage roadmap. It started contributing to the target wage for one production location in its main sourcing countries. The company is financing this contribution from its own overall margin. It has reserved a budget for implementing its Living Wage roadmap at least until 2027.

Although Zeeman actively contributes to higher wages in a few production locations, wage issues persist in other locations. Fair Wear expects Zeeman to actively and timely address remediation of any issue related to legal wage requirements. Fair Wear recommends Zeeman to get a better understanding of the link between its prices and wages to prevent wage issues from arising in the future. Zeeman has scored insufficient on a repeated non-compliance indicator (3.10). This needs to be resolved in the next performance check, else Zeeman will be automatically placed in Needs Improvement.

Fair Wear recommends that Zeeman expand its risk scoping to include other risk factors, such as product-level and business model risks, and focus on Freedom of Association and Social Dialogue.

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 members. 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 Zeeman textielSupers BV

## Member company information

Member since: 1 Oct 2019

Product types: Garments, clothing, fashion apparel, Accessories, Home textiles and Footwear

Percentage of CMT production versus support processes 89%

Percentage of FOB purchased through own or joint venture production 0%

Percentage of FOB purchased directly 100%

Percentage of FOB purchased through agents or intermediaries 56%

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 Agreement on Sustainable Garment and Textile, Amfori - BSCI, International Accord,

Number of complaints received last financial year 6

## Basic requirements

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

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

Membership fee has been paid? Yes

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

Production Country	Number of production locations	Percentage of production volume
China	69	49
Bangladesh	13	19
Pakistan	18	17
India	17	9
Türkiye	3	5
Philippines	1	1
Indonesia	1	0

# Layer 1 Foundational system's criteria

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**Possible Points: 8**

**Earned Points: 8**

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

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: Zeeman 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:** Zeeman 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: 54**

### Indicators on Sourcing strategy

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

**Comment:** Zeeman has 135 active textile suppliers. 81% of the production volume comes from suppliers where the member has at least 10% leverage at suppliers. 55% of the production volume comes from suppliers where Zeeman buys less than 2% of its total FOB. 60 production locations are responsible for almost 90% of the total FOB.

Zeeman does have a formal sourcing strategy, which is adjusted every five years following the revision of the overall strategy. The sourcing strategy will be revised in 2023.

Zeeman recognises the added value of consolidation and evaluates its relationship with all production locations, looking for possibilities to consolidate. In the past years, the number of production locations has diminished slightly.

**Recommendation:** Fair Wear recommends Zeeman to consolidate its supplier base where possible and increase leverage at main production locations to effectively request improvements in working conditions. It is advised to describe the consolidation process in a sourcing strategy agreed upon with top management/sourcing staff.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.2 Member company's sourcing strategy is focused on building long-term relationships.	Basic	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.	2	6	0

**Comment:** Zeeman has a sourcing strategy that focuses on maintaining long-term relationships.

87% of the member's total FOB volume comes from suppliers with whom Zeeman has had a business relationship for at least five years. The member does not commit to long-term forward-looking contracts yet.

**Recommendation:** Zeeman is advised to embed long-term contracts in its sourcing strategy.

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

**Comment:** Zeeman conducts risk scoping on sourcing country level, which included all eight labour standards. In its risk scoping, the member has assessed the impact and prevalence of the risks correctly. Country risk analysis is conducted by collecting information through various sources, such as the CSR Risk Checker and Fair Wear Country studies. Furthermore, Zeeman's network of local agents plays an important role in informing Zeeman of high risks.

The member has yet to include sector, business model, sourcing model, and product in its risk scoping. The overall risk scoping misses a gender lens, and the risks of sexual harassment and gender-based violence are only included for a few countries.

**Recommendation:** Fair Wear recommends Zeeman to include all risk factors in its risk scoping.

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 Zeeman to inform new suppliers about Fair Wear membership first by a brief introduction from the agent, next by sending the Zeeman two-way code of conduct and the Fair Wear questionnaire.

In 2023, three new production locations were added. However, not all documents were on file yet during the performance check.

**Requirement:** Zeeman should only start with a new supplier when the supplier agrees to commit to cooperating on improving labour conditions.

**Recommendation:** Fair Wear recommends that Zeeman 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:** Zeeman collects human rights information of potential new suppliers by collecting existing audit reports and asking factories to fill out the risk declaration form. Zeeman has used the input from the risk scoping to draft a risk declaration form per country, highlighting country-specific risks. All production locations are requested to fill out this form. Based on the information provided, Zeeman decides where to source from.

**Recommendation:** Fair Wear encourages the member to collect worker and stakeholder input before placing the first order.

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.	Intermediate	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.	4	6	0

**Comment:** Zeeman shares information about Fair Wear's CoLP and the complaints helpline within the first year of doing business. The Worker Information Sheet has been posted in all production locations. 35 production locations, responsible for 52% of FOB, have had a WEP training, covering the Fair Wear CoLP and complaints helpline, in the past two years.

## Indicators on Identifying continuous human rights risks

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

**Comment:** Zeeman 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 production location, depending on country risks, audit results, complaints and FOB and leverage figures. For its largest production locations, it has used Fair Wear audits except in Pakistan.

**Recommendation:** Fair Wear recommends that Zeeman not depends on audits alone and expands its monitoring instruments.

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

**Comment:** Zeeman has mapped the risks to FoA in all its sourcing countries and can explain the main risks per country. This has also been translated into country-specific risk declaration forms. For each production location, the company monitors the FoA situation. So far, Zeeman has not used the information as part of the risk assessment nor has it been translated into production location specific actions.



**Recommendation:** The member is recommended to ensure supplier-level monitoring is in place to assess and understand the risk at suppliers - for example, through the Supplier Questionnaire (tool 2 in Fair Wear's FoA Guide), modular assessment on Social Dialogue, in-depth discussions with 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	0

**Comment:** The member could show it understands the basic gender risks for its sourcing countries, and for instance, identified gender discrimination and violence and harassment as important risks prevalent in Pakistan, India and Bangladesh.

Additionally, Zeeman actively collects workforce gender-disaggregated data per factory. The member has yet to analyse the collected gender-disaggregated data at the factory and country levels.

**Recommendation:** Fair Wear recommends the member to collect country-level gender risks for each Code of Labour Practices.

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

**Comment:** Zeeman developed a supplier evaluation methodology that includes audit results. This supplier scorecard is regularly shared with buyers who are responsible for the products bought at each of the production locations. Compliance with the Code of Labour Practices is part of a systematic evaluation and influences purchasing decisions.

Zeeman has a clear responsible exit strategy, which is communicated upfront with production locations. When starting a business relationship, the company slowly increases the production volume, and when phasing out it slowly decreases production volume to ensure a limited impact on the production location.

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:** Zeeman has a policy in place that allows for announced subcontracting, which is also described in its responsible purchasing practices policy. To assess its environmental impact, the brand has developed a road map to identify printing and embroidery subcontractors. Also, as part of the material template, Zeeman has an overview of all material production locations, covering its entire supply chain. Despite efforts to collect information about all production locations, it sometimes happens that Zeeman only finds out about a production location when production has already started.

Zeeman assesses the risk of subcontracting by analysing its products and checking with suppliers whether all needed processes can take place in-house. Furthermore, the brand uses audit reports to identify subcontracting.

**Recommendation:** Fair Wear recommends Zeeman to require the intermediary always to inform Zeeman about the production location before the production starts.

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

**Comment:** Zeeman has identified whether homework is prevalent in its sourcing countries and has used this information to update its risk declaration form for India. Information has been collected, but the member has not yet identified specific action per production location to see whether preventive measures have been taken.

**Recommendation:** Fair Wear recommends Zeeman to conduct a capacity analysis looking into specific production processes to validate the suppliers' statements that no homeworkers are used.

## 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.	Advanced	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.	4	4	0

**Comment:** Zeeman uses contracts with its suppliers. The member has agreements in the form of the two-way code of conduct and a purchase order that stipulate general terms and conditions, including pricing terms. The two-way code of conduct clearly outline the shared responsibilities of CoLP implementation. Fair payment terms are part of that, outlining payment happens within 14 days after shipment and that Zeeman takes responsibility for clear contracts that are provided on time, without modifications. Although Zeeman makes shared responsibility explicit in its two-way code of conduct, there is still a difference in language to describe suppliers' responsibilities and Zeeman's responsibilities - 'shall' compared to 'we make every effort'.

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

**Comment:** There is an active interchange of information between CSR and other departments to enable coherent and responsible business practices. The member has not yet included responsible business practices in job role competencies, nor do sourcing and purchasing staff work with KPIs supporting good sourcing and pricing strategies.

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

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.15 Member company's purchasing practices support reasonable working hours.	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:** In its two-way code of conduct, Zeeman has described what type of responsible behaviour is expected from buyers when placing production, such as early order placement, limited sampling or not modifying contract terms.

Zeeman works with three types of products: Never out of stock-items (NOS) which are stored, basic items that directly go to the shops (multilot) and seasonal products. Forecasts for the NOS- and multilot-items are discussed nine months in advance and orders are placed six months in advance. Seasonal products are not forecasted but orders are placed six months in advance. Zeeman includes amounts in its contracts (5%-10%) that are 'open to buy', where orders can also be placed within a shorter timeframe than six months. Feedback from suppliers in the survey showed that lead times could be up to two to three months.

Zeeman does not enforce production deadlines. It does have an overview of product deliveries deviation from the production planning but has not used this information to evaluate production capacity. Zeeman does not yet have insight into the production planning process of its factories, such as (available) production capacity, knowledge about labour minutes or peak seasons.

**Recommendation:** Fair Wear strongly recommends Zeeman to collect more information about the production planning and possible delays to understand better the impact of Zeeman's orders on factory capacity.

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.	Insufficient	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.	0	6	0

**Comment:** Zeeman investigated the cost breakdown of its products directly with production locations and through the use of Fair Wear tools, such as Fair Price. The company also collected wage information from different countries and production locations. In 2022, the company organised training for buyers to understand the link between prices and wages. At the moment, the company does not link its prices, specifically the labour cost, to wages paid in production locations.

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

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

**Comment:** Zeeman has informed its sourcing intermediaries of Fair Wear requirements and could show they informed production locations. The member is yet to require from its intermediaries that they uphold the purchasing practices as mentioned in the Common Framework for Responsible Purchasing Practices (CFRPP).

**Recommendation:** The member is recommended to check if the intermediary's purchasing practices are in line with the Common Framework for Responsible Purchasing Practices (CFRPP) and if the intermediary has adequate systems to ensure payments are made on time.



## Layer 3 Remediation and impact

**Possible Points: 84**

**Earned Points: 48**

### 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.	Intermediate	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.	4	6	0

**Comment:** Based on the risk identification described in chapter two, Zeeman has linked factory risks to appropriate, albeit basic, follow-up for its largest factories, covering around two-thirds of its production volume. For each factory, it is clear if additional information needs to be collected, and specific actions have been identified based on audit information. Also, Zeeman keeps track of training needs and sessions organised as part of its general approach.

Zeeman sources from 14 production locations in Bangladesh. The member has signed the International Accord.

**Recommendation:** Fair Wear recommends the member to further improve its follow-up plans, following specific factories' risk-profiles and going beyond its main strategic production locations.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.2 Member company's improvement and prevention programmes include a gender lens.	Insufficient	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.	0	6	0

**Comment:** In its risk declaration forms for India, Pakistan and Bangladesh, Zeeman asks production locations to ensure internal anti-harassment committees are in place. For Pakistan, the risk declaration form also asks production locations to commit to more women in worker committees and in management positions.

**Recommendation:** Zeeman is recommended to extend its gender lens to the implementation of all its improvement 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:** In 2022, Zeeman selected a production location to join the Amplify project, supported by the trade unions Mondiaal FNV and CNV International, to receive training around Freedom of Association and Collective Bargaining. In the selected factory, a union will be established and supported. The project will start in 2023.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.4 Member company actively supports operational-level internal grievance mechanism.	Basic	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.	2	6	0

**Comment:** Zeeman keeps track of suppliers' internal grievance mechanisms at the start and throughout its business relationship. Based on information gathered from production locations, Zeeman realises internal grievance mechanisms do not always function. However, the company does not actively support and monitor the effectiveness of internal grievance mechanisms, it rather focuses on sharing information about the Fair Wear Complaints helpline.

**Recommendation:** Fair Wear recommends Zeeman to always involve suppliers and worker representatives in the assessment of the internal grievance mechanism, and to share and discuss the outcome of the assessment with the above stakeholders, who should be encouraged to lead a discussion on how the mechanisms can be improved.

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

**Comment:** Zeeman shares suppliers with several Fair Wear members. Zeeman showed to be open to active collaboration with other Fair Wear members as well as with other customers to address and resolve risks and issues at suppliers. Zeeman also cooperates with different brands in its approach to raising wages, in a consultative process as well as in actually contributing to higher wages.

## 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.	40%	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, Zeeman has received 37 audit reports. During the performance check, the member could demonstrate with a sample that around 40% of the CAP issues requiring improvement actions have been followed up. Examples of improvement actions that were taken include improvements of health and safety issues, awareness of Fair Wear's Code of Labour Practices through training, awareness of worker representatives and training for worker representatives. Zeeman heavily relies on its agents to follow-up on CAP findings.

**Recommendation:** Fair Wear strongly recommends ensuring that the size of the supply chain and the available resources of Zeeman to actively follow up on CAP issues are coinciding. Possible solutions could be to decrease the number of suppliers or increase the resources needed to be able to work on improvement actions.

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:** The country-risk declaration forms result from audit analyses. The forms include risks based on a root cause analysis and help to identify preventive measures. All factories, except for the Pakistani, have signed the risk declaration forms. Zeeman is now starting to discuss the outcomes of the risk declaration forms with the suppliers to start to develop some preventive steps addressing these root causes.

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

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

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

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.9 Degree to which member company mitigates root causes of excessive overtime.	Basic	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.	2	6	0

**Comment:** Zeeman learned through the audit reports that excessive overtime is an issue for many suppliers. All 18 Fair Wear audits in the last financial year mention excessive overtime. Zeeman is generally aware of the root causes but has not identified root causes per supplier. The brand recognised peak seasons, bad planning from the factory, late material deliveries and too high orders compared to available staff as potential root causes. The supplier survey also gave insight into how Zeeman's purchasing practices could pose a risk of causing excessive overtime. In following up on audit reports, Zeeman discussed excessive overtime with its suppliers. Furthermore, the member has updated its guidelines on purchasing practices in its two-way code of conduct and has shared this with its buyers to prevent contributing to excessive overtime.

**Recommendation:** Zeeman could use the outcomes of the root cause analysis to identify strategies that minimise the impact of its sourcing practices on working hours. The member could develop processes to deal with possible delays to avoid excessive overtime. Those processes include being flexible with delivery dates, prioritising orders, offering support/flexibility for material delivery, ordering in low season, keeping stock etc.

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.	Insufficient	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 18 audits included findings regarding non-payment of legal minimum wage, and 14 audits included findings regarding legally required wage elements, such as payment of overtime premium or holiday leave, or failed to provide wage data. Zeeman was able to show a follow-up on the findings of 14 audits. In nine cases, Zeeman showed remediation evidence, and in five cases, Zeeman could show its remediation efforts but could not demonstrate the issues had been solved.



**Requirement:** Please note that following Fair Wear's policy for repeated non-compliance, members that receive an insufficient score on this indicator for the second year will be placed in the 'needs improvement' category.

If a supplier fails to comply with legal wage regulations, members are expected to respond in time, identify root causes with factory management, and resolve that local labour laws are respected. Evidence of remediation must be collected.

**Recommendation:** Fair Wear strongly recommends Zeeman to ensure problems of payments below legal minimum wages are not just prevented going forward but also remediated retroactively.

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.	Advanced	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach.	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.	6	6	0

**Comment:** Zeeman has identified the wage gap for its most important production locations. It has done a root-cause analysis to find out why wages at suppliers are below the living wage. Based on the root-cause analysis, Zeeman has developed a time-bound plan to enable the systemic increase of wages at all its suppliers. This has been described in its living wage roadmap, outlining its plans for the coming years. It has started discussing the topic of living wages with several production locations and started actively contributing to higher wages in the last financial year.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.12 Member company determines and finances wage increases.	Advanced	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.	6	6	0

**Comment:** Zeeman is committed to raising wages at its production locations. As a target wage it uses living wage estimates as provided by the Global Living Wage Coalition in all production countries. In 2022, Zeeman started to contribute to the target wage for one production location in each of its main sourcing countries, except for China. The company is financing this contribution from its own overall margin. It has reserved budget for the implementation of its Living Wage roadmap at least until 2027. Zeeman's commitment to living wage is also included in its newly developed two-way Code of Conduct.

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.	13%	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.	2	6	0

**Comment:** Zeeman pays a living wage surcharge in one textile factory in India, two factories in Bangladesh, one factory in Turkey and one factory in Pakistan. These locations are responsible for 13% of total textile FOB.

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.	Advanced	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.	4	4	-2

**Comment:** Zeeman received six complaints in the past financial year, about wages, legally binding employment relationships and health and safety at its suppliers in Bangladesh, China, India and Pakistan. Zeeman has addressed the complaints in line with Fair Wear's complaint procedure. Based on a complaint regarding gender-based violence in Bangladesh, the company enrolled all Bangladeshi production locations in training.

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.	Advanced	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.	6	6	0

**Comment:** Zeeman has some CAP findings where training is a recommended follow-up action. Zeeman's general approach includes enrolling production locations in WEP training after a Fair Wear audit. In 2022, 29 production locations received training from Fair Wear, this includes production locations where it was recommended after the audit as well as production locations where Zeeman wanted to strengthen its relationship and production location awareness of labour rights in general and Fair Wear specifically.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.16 Degree to which member company follows up after a training programme.	Member company did not implement any training	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.	N/A	6	0

**Comment:** Zeeman organised WEP Basic training, which do not require specific follow-up and for the more advanced training the company has not received training reports yet and awaits those to decide on appropriate follow-up.

**Recommendation:** Fair Wear recommends Zeeman to use the training results as input for Zeeman's human rights risk monitoring.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.17 The member company's human rights risk monitoring system includes a responsible exit strategy.	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:** Zeeman's human rights risk monitoring includes a responsible exit strategy. In 2022, the company developed a responsible exit strategy policy, which follows Fair Wear recommendations and includes its exit strategy in its two-way code of conduct. As such, all production locations are informed about Zeeman's approach. In the past financial year, Zeeman did not yet use its policy when ending relations with production locations.

In 2022, the member stopped production at 21 production locations, combined responsible for 3% of FOB in 2021. In all but one Zeeman had less than 5% leverage.

**Recommendation:** Fair Wear recommends Zeeman to follow its responsible exit strategy when deciding to stop at a production location.

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.	Basic	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.	2	6	0

**Comment:** Zeeman undertakes activities related to human rights that go beyond Fair Wear's scope, cooperating with different NGOs. For its tier 2 and beyond suppliers and its non-textile production locations, it uses a similar approach to ensure it monitors human rights risks.

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

**Possible Points: 22**

**Earned Points: 14**

### 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.	Advanced	Fair Wear membership includes the need for a brand to show its efforts, progress, and results. Fair Wear members have the tools and targeted content to showcase accountability and inform customers, consumers, and retailers. The more brands communicate about their sustainability work, the greater the overall impact of the work of the Fair Wear member community.	Member website, sales brochures, and other communication materials.	4	4	0

**Comment:** Zeeman communicates accurately about Fair Wear membership on its website. The member also uses other channels (advertisements, events etc) to inform customers and stakeholders about Fair Wear membership.

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

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:** Zeeman has submitted its social report, which Fair Wear approved. Zeeman 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	0

**Comment:** Zeeman published its social report, which includes some factory-level data and remediation results as well as a time-bound plan on living wages, on its website.

**Recommendation:** Zeeman is recommended to include more factory-level data on time-bound improvement plans in its reporting and ensure suppliers consent to data sharing.

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

**Comment:** Zeeman has a system to track progress and check if implemented measures have effectively prevented and remediated human rights violations through its supplier scorecards. The results of the supplier scorecards are translated into the company's KPIs, which are the basis of the management team's appraisal 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.	Basic	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.	0	4	-2

**Comment:** The previous performance check included a requirement regarding understanding the link between prices and wages. Zeeman has taken steps to improve its understanding, as described under indicator 2.16. However, it remains a point for improvement.

**Recommendation:** Zeeman is strongly recommended to address the requirements that are still outstanding.

## 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.: Yes

Comments: Zeeman actively participated in lobby activities aimed at Dutch and EU legislation on HRDD.

5.3 Member company actively contributed to industry outreach, visibility, and learning in its main selling markets.: Yes

Comments: Zeeman actively contributed to industry outreach, visibility and learning in its main selling markets. It participated in the OECD Forum and other stakeholder dialogues. Newspaper articles were published on its commitment to payment of a living wage.

## Recommendations to Fair Wear

Zeeman has the following recommendations for Fair Wear:

- Set-up a local team in Pakistan;

- Expand the member base to create more impact;

- Allow for partial audits, to monitor progress on specific labour standards;

- Allow for incorporation of non-textile producers in the Fair Wear system.

## Brand Performance Check details

Date of Brand Performance Check: **15-08-2023**

Conducted by: **Anne van Lakerveld**

Interviews with: Erik-Jan Mares (CEO)

Erica Roolvink (CSR & Buyer Director)

Arnoud van Vliet (CSR & Quality Manager)

Christine van Dorp (CSR Specialist)

Bo Duijvestijn (Junior CSR Specialist)

Zoe Punt (CSR & Quality Assistant)

Herma Martina (Senior Buyer)

Eric-Paul van Egmond (Senior Buyer)

Cindy Gennes (Manager Finance Administration)

Pieter Grootendorst (Business Controller)