FASHION TRANSPARENCY INDEX

A review of 100 of the biggest global fashion brands and retailers ranked according to how much they disclose about their social and environmental policies, practices and impact.

FASHION REVOLUTION

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FOREWORD



CARRY SOMERS
FOUNDER AND GLOBAL OPERATIONS DIRECTOR
FASHION REVOLUTION

The journeys made by our clothes remain largely unseen. They may have started life in a field and then travelled across a vast network, in many countries, through the hands of hundreds of workers, working for dozens of different companies, before reaching our wardrobes.

The complexity and fragmentation of the fashion supply chain was brought home to me after the Rana Plaza factory collapse in Bangladesh, when campaigners had to physically search through the rubble for clothing labels to prove which brands were producing in there. Many brands simply didn't know what their relationship was with those factories. It was clear to me at that moment that producers had become faceless and that lack of transparency and accountability was costing lives.

Tragedies like Rana Plaza are eminently preventable, but will continue to happen until brands, and every other stakeholder in the fashion supply chain, takes responsibility for their actions and impacts. Transparency is the first step towards making this happen.

"Transparency encourages scrutiny, vigilance and accountability. It's like opening one's front door and allowing others to look inside; not yet the full picture, but an important step towards openness and public disclosure. And of course, the more doors are open, the more the picture becomes clearer, the better we can understand and ameliorate supply chain workers' lives and the environment."

ORSOLA DE CASTRO
FOUNDER AND CREATIVE DIRECTOR,
FASHION REVOLUTION

The 2017 Fashion Transparency Index shows which brands are already taking steps towards becoming more accountable, not just to their shareholders but also to their customers, and ultimately to their workers. Ideally, this Index will act as a benchmark to encourage brands to move towards greater transparency. I hope the scores in this year's Index will also show people around the world why it is so essential to keep on asking the question #whomademyclothes.

Greater transparency will bring direct benefits to workers, their communities and their environment. The 100 fashion brands included in this Index have the potential to improve millions of lives around the world. Transparency is one step in the journey towards making this a reality.

EXECUTIVE SUMMARY

We don't know enough about the impact our clothing has on people and planet

Even the brands that come out in the highest range of scoring have a long way to go towards being transparent about their suppliers, supply chain management and their business practices.

The average score for all brands in the Fashion Transparency Index is 49 out of 250, roughly 20% of all possible points. Adidas and Reebok achieved the highest score of 121.5 out of 250 (49% of the total possible points) — followed by Marks & Spencer with 120 points and H&M with 119.5 points (48% of the total possible points).

Only 8 brands scored higher than 40% and no brand scored above 50%. Three brands scored zero, disclosing nothing at all — Dior, Heilan Home and s.Oliver. 32 brands scored 10% or less, revealing a limited number of policies and procedures.

Overall brands are widely sharing policies and commitments

Brands score relatively well for disclosing their policies and commitments. When it comes to publishing policies and commitments, the highest concentration of brands (16) scored in the 71–80% range with 11 brands scoring above 80% and 15 brands scoring less than 20%.

Brands publish little information about the impacts of their practices

While we are seeing brands share their policies and commitments there is still much crucial information about the practices of the fashion industry that remains concealed, particularly when it comes to brands' tangible impact on the lives of workers in the supply chain and on the environment. Brands score far fewer points when you drive into detail about what they do and the effects of their supply chain efforts. For example, the majority of brands (84%) describe having established factory assessment procedures in place. However, on average brands score just 21% when it comes to disclosing detailed results of their supplier assessments and score 20% on average when it comes to sharing detailed remediation activities.

Increasing number of brands are disclosing who their suppliers are

The good news is that 32 brands are publishing supplier lists (tier 1), which is an increase from last year when Fashion Revolution surveyed 40 big fashion companies and only five were publishing supplier lists. 14 brands are publishing their processing facilities. Banana Republic, Gap and Old Navy (all owned by Gap Inc.) scored highest on traceability (44%) because their supplier lists include detailed information such as types of products or services and approximate number of workers in each supplier facility.

Still a long way to go towards paying a living wage

34 out of the 100 brands have made public commitments to paying living wages to workers in the supply chain (such as through collective bargaining agreements or as part of the Fair Labor Association) but only four brands — H&M, Marks & Spencer, New Look and Puma — are reporting on progress towards achieving this aim.

Few brands promoting efforts to extend the life of products and reduce consumption of resources

Only three brands — Burberry, Gucci and Levi Strauss — are promoting repair services in order to extend the life of its products, while just 14 brands disclose investments in circular resources with the aim of keeping materials in perpetual use and out of landfills.

More opportunity to increase supply chain transparency

While brands are beginning to disclose more information about their practices —particularly with regard to their policies, procedures and suppliers — we know relatively little about the results of brands' efforts to improve the social and environmental impacts of our clothing. Therefore brands still have a long way to go towards transparency.

WHY TRANSPARENCY?

WHY GREATER TRANSPARENCY IS IMPORTANT IN THE FASHION INDUSTRY

Today, both people and the environment suffer as a result of the way fashion is made, sourced and consumed. It's time for a Fashion Revolution, and we believe that the beginning of this process is greater transparency.

At the moment, most of the world lives in a capitalist economy. This means companies must increase sales growth and make profits in order to succeed — but crucially, not at the expense of peoples' working conditions, health, livelihoods, dignity and creativity and not at the expense of our natural environment.

Lack of transparency costs lives

It is impossible for brands to make sure human rights are respected and that environmental practices are sound without knowing where their products are made, who is making them and under what conditions.

It has been four years since Rana Plaza collapsed; the day that the Fashion Revolution movement was born. The factories operating in the Rana Plaza building made clothes for over a dozen well-known international clothing brands, many of them included in this report. It took weeks for several brands to determine whether they had connections with the factories inside that building, despite their clothing labels being found in the rubble.





[TOP] 'Dhaka Savar Building Collapse' by rijans via Flickr CC

[Bottom] 'Site of the Rana Plaza factory collapse' by Sarah Jay

Fashion supply chains are long and complex

The vast majority of today's fashion brands do not own their manufacturing facilities, making it seem difficult to monitor or control working conditions throughout the supply chain. It can also be a convenient excuse for brands to evade responsibility for how their products are made.

Some brands may work with thousands of factories at any given time – and that is just the facilities that cut, sew and assemble our garments. There are also facilities down the chain that dye, weave and finish materials and farms that grow fibres too. During the manufacturing process our clothes are touched by a great many pairs of hands before they reach the rails or shelves of the shop floor.

A brand might place an order with one supplier, who carves up the order and sub-contracts the work to other factories. This happens regularly across the industry and presents a great challenge for brands themselves as well as the people working in the supply chain who become invisible in this process.

If you can't see it, you can't fix it

When companies publish information about their supply chains and business practices it helps NGOs, unions, local communities and even workers themselves to more swiftly alert brands to human rights and environmental issues. It can also help the company keep track of any unauthorised suppliers being used to make its products¹, which makes it easier to manage risks that might lead to human rights and environmental abuses and could harm the company's reputation.

This sort of transparent disclosure makes it easier for all the relevant parties to understand what went wrong, who is responsible and how to fix it. We believe that transparency leads to greater accountability, which eventually will lead to a change in the way business is done.



People want to know #whomademyclothes

People are increasingly asking for greater transparency from the brands they buy. During Fashion Revolution Week last year, the **#whomademyclothes** hashtag reached 129 million people through 70,000 posts on Twitter and Instagram.

Transparency is quickly becoming the norm as explained in the Business of Fashion last year: Transparency helps people who are concerned about the human and environmental impact of what they purchase to make more informed decisions. Transparency helps consumers scrutinise brands but also builds trust in the brands they buy.

"For decades, a brand's only priority was to create the best possible product at the most competitive price to ensure sales. But as consumers develop a more comprehensive understanding of issues like sustainability, authenticity and transparency, brands and retailers are being forced to change the way they sell in order to survive"

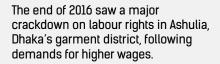
BUSINESS OF FASHION 29 SEPT 2016



WHY ARE TRANSPARENT SUPPLY CHAINS NECESSARY?



JENNY HOLDCROFT
ASSISTANT GENERAL SECRETARY
INDUSTRIALL GLOBAL UNION



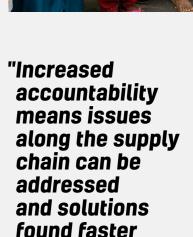
The Bangladeshi government and garment factory owners used the wage strike as a pretext to suspend more than 1,600 workers, and arrest 35 union leaders and garment workers.

Calling on the government of Bangladesh to release the people in jail and for all charges to be dropped was one part of the action taken. Another was to call on the brands supplying from the factories involved. But without access to the information it was difficult to create meaningful leverage to mitigate severe labour and human rights violations.

Increased accountability means issues along the supply chain can be addressed and solutions found faster.

Knowing the names of major buyers from factories gives workers and their unions a stronger leverage, crucial for a timely solution when resolving conflicts, whether it be refusal to recognize the union, or unlawful sackings for demanding their rights.

It also provides the possibility to create a link from the worker back to the customer and possibly media to bring attention to the issues.



GARMENT

WORKERS NEED UNIONS

CLOTHES

GARMENT



Without being able to verify brands' suppliers, workers must remove labels from a supplier to create the link back to the brand. This is problematic as it puts workers at risk and furthermore, it is only circumstantial evidence of the link. This puts the burden of proof on the worker where in fact it should be with the brand.

The fourth anniversary of the Rana Plaza collapse on 24 April is a stark reminder that voluntary, non-transparent inspections should be a thing of the past. Increased transparency is an important step for improving industrial relations in the supply chain.

WHAT DO WE MEAN BY TRANSPARENCY?

For Fashion Revolution, transparency means public disclosure of brands' policies, procedures, goals and commitments, performance, progress and real-world impacts on workers, communities and the environment.

Transparency requires brands to know exactly who makes their products – from who stitched them right through to who dyed the fabric and who farmed the cotton. And crucially, it requires brands to share this information publicly.

Some brands opt to disclose supply chain information to selected NGOs or unions rather than publicly, and have done so for many years in order to manage their supply chain risks. However, we feel this is not enough. Health and safety incidents, widespread abuses and even deaths are still happening, despite this industry-facing disclosure.

Transparency is a means to change, not an end

Transparency is not the end game. Ultimately, Fashion Revolution believes that the whole fashion industry needs a radical paradigm shift and that the way that we produce and consume clothes needs to be transformed. This means business models will need to change and a multiplicity of solutions will be required.

Transparency shines a light on issues often kept in the dark

Transparency alone does not represent the sort of structural, systemic change we would like to see for the fashion industry – but it helps us get there. Transparency helps to reveal the structures in place so we can better understand how to change them.

TRANSPARENCY

FAIR TRADE

WELL-BEING

LIVING WAGES

EMPOWERMENT

GENDER EQUALITY

BUSINESS ACCOUNTABILITY

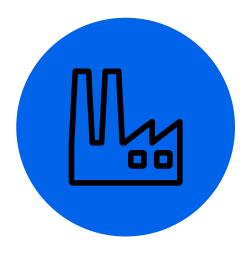
SUSTAINABLE LIVELIHOODS

GOOD WORKING CONDITIONS

ENVIRONMENTAL SUSTAINABILITY

A FAIRER, SAFER, CLEANER FASHION INDUSTRY

TO ACHIEVE CHANGE WE RECOGNISE 3 IMPORTANT THINGS:



It's a process

It is going to be a long journey towards a different industry model, requiring many incremental but necessary steps, to turn the tide of fast fashion or other unsustainable business models. We believe the first step is greater transparency. This will take consumers, brands and retailers, governments and citizens in supply chains each taking action. Fashion Revolution is engaging with all of these groups to catalyse positive change.



More information is needed

Many people continue to shop from big corporate brands, but want more tools to understand how products are made, where they are made, by whom and under what conditions.



Inclusivity is key

Millions of workers are employed through the supply chains of these big brands, and we must be careful to ensure that future of the fashion industry is able to provide decent work, sustainable livelihoods, hope and integrity for everyone employed in it, from farm to retail.

ABOUT THE FASHION TRANSPARENCY INDEX



WHAT IS THE FASHION TRANSPARENCY INDEX?

The Fashion Transparency Index 2017 reviews and ranks 100 of the biggest global fashion and apparel brands and retailers according to how much information they disclose about their suppliers, supply chain policies and practices, and social and environmental impacts.

What we hope to achieve through the Fashion Transparency Index

Through researching and publishing the Fashion Transparency Index year on year, we hope it will push brands in a more positive direction towards a reimagining of the fashion industry and a fundamental shift in the way it works, beginning with being more transparent.

The Fashion Transparency Index is simply one small tool in our wider efforts to fundamentally change the fashion industry.

The scope

We have deliberately chosen to focus on transparency and not everything that brands are doing. Shining a light on transparency isn't the only way to fundamentally change the fashion industry, but it's a powerful starting point. If the information disclosed by brands is granular enough, it can be useful for others (experts, NGOs, unions, workers themselves) who want to hold them to account for any real-world impacts on producers and the environment. This is why we are looking for disclosure not only on brands' policies and procedures, which is perhaps easier for them to share, but also on performance, progress and impacts across the business and its supply chain.

A 2017 report from the NYU Stern Center for Business and Human Rights explains:

"Companies understandably are likely to highlight the efforts they make, often through their corporate social responsibility or communications departments, rather than the higher-cost, higher-risk analysis of the effectiveness of those efforts"

This is exactly the type of detail brands might be reluctant to disclose but is crucial for change. This is why we are advocating for transparency.

What's not in scope

The Fashion Transparency Index does not tell you what brands are good or bad, naughty or nice, nor decent or exploitative. Unfortunately, we don't think a simple answer to this dichotomy exists.

There are limits to desk-based research, and only on-the-ground research by NGOs, unions and academics can reveal the impacts of brands' policies and practices. By encouraging brands to become more transparent, the Fashion Transparency Index will facilitate the work of NGOs, unions and academics.

At the end of this report you will find a list of organisations who have undertaken detailed onthe-ground research into the effects that brands' policies and procedures can have on workers, their families and communities.

THE METHODOLOGY

The Fashion Transparency Index uses a ratings methodology to benchmark brands' disclosure across five key areas, including: policy and commitments, governance, traceability, supplier assessment and remediation, and 'spotlight issues' covering the business model, living wages, unions and collective bargaining. We have awarded points only for information that has been publicly disclosed.

1.

POLICY & COMMITMENTS

- –What are the brand's social and environmental policies?
- -How is the brand putting its policies into practice?
- -How does the brand decide which issues to prioritise?
- –What are the brand's future goals for improving its impacts?

2

GOVERNANCE

- -Who in the brand is responsible for the brand's social and environmental impacts?
- -How can they be contacted?
- -How does the brand incorporate human rights and environmental issues into its buying and sourcing practices?

3.

TRACEABILITY

- –Does the brand publish a list of its suppliers, from manufacturing to raw material level?
- -If so, how much detail do they share?

4.

KNOW, SHOW & FIX

- -How does the brand assess the implementation of its supplier policies?
- -How does the brand fix problems when found in its supplier facilities?
- -Does the brand report assessment findings?
- -How can workers report grievances?

5.

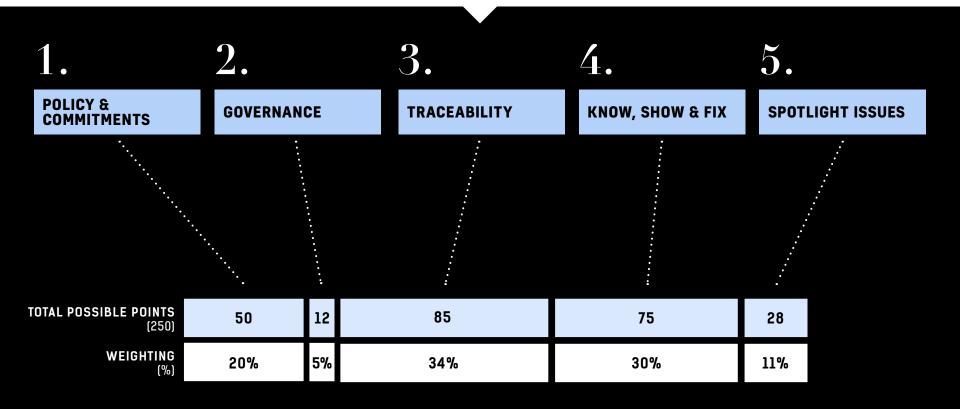
SPOTLIGHT ISSUES

- -What is the brand doing to ensure workers are being paid a living wage?
- -What is the brand doing to support workers' Freedom of Association?
- -What is the brand doing to reduce consumption of resources?

WEIGHTING OF THE SCORES

The 2017 methodology focuses exclusively on public disclosure of supply chain information. Therefore, the weighting of the scores is intended to emphasise increasing levels of detailed disclosure, especially when it comes to publishing supplier lists and the results of supplier assessments. We are rewarding granularity.

Please be aware that when brands score zero on an individual indicator, it doesn't necessarily mean anything bad. It just means they're not disclosing their efforts publicly.



ABOUT THE NEW METHODOLOGY

You may have noticed that the methodology has changed since last year.

The 2016 methodology was created by Ethical Consumer with input from Fashion Revolution. For 2017, Fashion Revolution has taken a lead on the further development of the Fashion Transparency Index, including a revision of the methodology.

We spent four months at the end of last year consulting a diverse group of more than 20 industry experts on revisions. The new methodology is also based on existing international standards and benchmarks including: Sustainable Development Goals, Ethical Trading Initiative Base Code, UN Guiding Principles, OECD Due Diligence Guidelines and Fair Labor Association's Freedom of Association guidelines.

The 2017 methodology has been designed by the Fashion Revolution team, led by **Sarah Ditty** and **Carry Somers**, with consultative input and feedback from a committee of pro bono industry experts, including:

- Dr Mark Anner, Associate Professor of Labor and Employment Relations, and Director of the Center for Global Workers' Rights at Penn State University
- Neil Brown, Investment Manager at Alliance Trust Investments
- Ian Cook, Associate Professor of Geography at University of Exeter
- Subindhu Garkhel, Cotton Product Manager at Fairtrade Foundation
- Jenny Holdcroft, Assistant Secretary General at IndustriALL Global Union
- Dr Alessandra Mezzadri, Lecturer in Development Studies at SOAS, University of London
- Heather Webb, Researcher at Ethical Consumer
- and several others experts who wished to remain unnamed.

The individuals and organisations we consulted on the methodology do not necessarily endorse the findings detailed within this report. The key objective of our consultative process was to gather feedback from a variety of perspectives to help inform and shape its strategy and design.

Throughout these discussions, input served to highlight both the immense challenges still remaining and the significant opportunities for industry wide improvement on transparency.

"The 2017 research will serve as a baseline by which we can measure brands increased transparency year on year"

SARAH DITTY HEAD OF POLICY, FASHION REVOLUTION Please be aware that this research only measures a moment in time, and there are plenty of important topics that the Fashion Transparency Index doesn't cover; for example, cost and pricing transparency.

Therefore, we believe that this report is most useful for analysing patterns rather than micro-scrutinising each brand's individual scores. We would encourage readers to use this Index as a proxy to better understand generally what level of transparency we are seeing from big global brands on social and environmental issues.

We hope readers will use this as an opportunity to start a wider conversation about how much (or rather how little) we know about the clothes we wear and the people who make them.

HOW THE 100 BRANDS WERE CHOSEN

Brands were selected on the basis of three factors:



according to annual turnover, over \$1.2 billion USD



voluntarily agreed to be included after last year's edition



representing a cross-section of market segments including high street, luxury, sportswear, accessories, footwear and denim from across Europe, North America, South America and Asia

We relied on publicly available financial information.

Some big brands are privately held and do not publish financial records, including turnover, which means we were unable to include them in this edition. Where brands are part of a parent company* with annual turnover over \$1.2 billion USD, we have selected the brand or brands that appear to make up the most significant part of the group's business.

100 **BRANDS A**—**Z**

Abercrombie & Fitch

Adidas

Aéropostale

Amazon

American Eagle

Anthropologie (URBN)

Asics Corporation

ASOS

Banana Republic (Gap Inc.)

Benetton

Bershka (Inditex)

Bottega Veneta (Kering Group)

Burberry Burlington

C&A

Calvin Klein (PVH)

Calzedonia

Champion (HanesBrands)

Chanel Chico's

Claire's Accessories

COACH

Columbia Sportswear

Converse (Nike, Inc.)

Costco Dillard's

Dior

Ermenegildo Zegna

Esprit **Express** Forever 21 Gap

George at Asda (Walmart)

Gildan Activewear

Giorgio Armani

Gucci (Kering Group) Guess

H&M Hanes

Heilan Home

Hermès

Hudson's Bay (HBC) Hugo Boss

JCPenney J.Crew

Jack & Jones (Bestseller)

Jordan (Nike, Inc.)

Kohl's Lacoste Lands End

Levi Strauss & Co

II Bean LOFT

Louis Vuitton (LVMH)

Lululemon Macy's

Mango

Marks & Spencer Massimo Dutti (Inditex)

Matalan Mexx

Next

Michael Kors

Miu Miu (Prada Group)

Monsoon Neiman Marcus **New Balance New Look**

Nike

Nordstrom Old Navy (Gap Inc.)

Pernambucanas

Prada

Primark (ABF)

Pull&Bear (Inditex)

Puma (Kering Group)

Ralph Lauren

Reebok (Adidas)

Renner Ross Stores

Russell Athletic

s.Oliver

Sak's Fifth Avenue (HBC)

Target Tesco

The North Face (VF Corp)

Timberland (VF Corp)

TJ Maxx (TJX)

Tommy Hilfiger (PVH)

Topshop (Arcadia Group) Triumph

Under Armour

Uniqlo (Fast Retailing) **Urban Outfitters**

Victoria's Secret

Walmart

Wrangler (VF Corp)

YSL (Kering Group)

Zalando Zara (Inditex)

^{*}In general, the scores for brands which are part of a parent company apply to all of the subsidiaries in the parent company, not just the brands included in this report. There are some exceptions: for example, George at ASDA and Walmart; and Puma and Kering Group.

HOW THE RESEARCH WAS CONDUCTED

The Fashion Transparency Index used only publicly disclosed information about each brand's:

- policies;
- · procedures and processes;
- performance, progress and impacts;
- · corporate governance; and
- · supplier details;

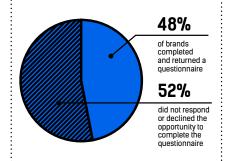
focusing on human rights and environmental issues across its supply chains.

We relied solely on information published via:

- the brand's website(s):
- · parent company website(s);
- in annual/sustainability reports (published January 2015 or later);
- or via third party websites but only when linked to directly from the company's own websites or reports.

We sent each brand a questionnaire, which helped us identify where information is publicly disclosed and to clarify information we found through our own research in order to ensure accuracy. Brands were given one month to respond and return the questionnaire. We received completed questionnaires covering 48 brands, meaning no response or declines from the remaining 52 brands. The questionnaires returned to us by brands were analysed by our research team, and scores were awarded where appropriate.

QUESTIONNAIRE RESPONSE



We researched and scored brands regardless of whether they completed the questionnaire or not. However, brands that completed the questionnaire were more likely to receive a higher score than they would have otherwise. This is simply because our researchers may have missed some information. There is no common template for reporting on social and environmental issues that every brand is using. Many companies produce annual reports that span 200-400 pages; and as such there is a notable margin for human error. This is an inherent limitation of desk-based research. However, our research team endeavoured to be as thorough, accurate and fair as possible.

Should you know of any remaining inaccuracies, please contact us at sarah@fashionrevolution.org and we will take this into account for the next edition.

We intend to keep the first four core sections of this methodology the same in future annual editions of the Fashion Transparency Index in order to measure progress year on year, with 2017 acting as the baseline. However, this research is very much a learning process, and we are always open to ideas for improvement.

The research was conducted by Sarah Ditty and Carry Somers, with support from Sophia Calugay, Ilishio Lovejoy, Aidan Shaw, Sienna Somers, Eloisa Artuso and Manon Thomas, between January and March 2017.

THE FINAL SCORES



FASHION REVOLUTION | FASHION TRANSPARENCY INDEX 2017

A ROUGH GUIDE TO THE SCORING

Total scores were out of 250 possible points, which we have converted into percentages. We chose to publish percentages rather than each brands' individual scores because we felt it encourages readers to focus on emerging patterns rather than exact details.

0-10% 11-20% 21-30% 31-40% 41-50% 51-60% 61-70% 71-80% 81-90% 91-100%

TRANSPARENCY

Brands scoring between 0-5% are disclosing nothing at all or a very limited number of policies, which tend to be related to the brand's job hiring practices or local community engagement activities.

Brands scoring between 5–10% are likely to be publishing some policies for both its own employees and suppliers. Those closer to 10% are likely to be publishing a basic supplier code of conduct and some detailed information about their procedures and possibly supplier assessment process.

Brands scoring between 11-20% are likely to be publishing a majority of policies, some procedures and information about their supplier assessment and remediation processes.

Brands scoring between 20-30% are likely to be publishing much more detailed information about their policies, procedures, social and environmental goals and supplier assessment and remediation processes.

Brands scoring between 30-40% are the brands who are publishing suppliers lists as well as detailed information about their policies, procedures, social and environmental goals, supplier assessment and remediation processes and general assessment findings. These brands are also more likely to be addressing the Spotlight Issues such as living wages, collective bargaining and/ or circular resources.

Brands scoring over 40% are those who are most likely to be publishing more detailed supplier lists, some will be publishing processing facilities as well as manufacturers - in addition to detailed information about their policies, procedures. social and environmental goals, supplier assessment and remediation processes and general assessment findings. These brands are also more likely to be addressing the Spotlight Issues such as living wages, collective bargaining and/ or circular resources.

No brands score above 50% but if they did these brands would be disclosing all of the information already described as well as publishing detailed information about assessment and remediation findings and detailed supplier lists from manufacturing right down to raw materials. These brands would be making public commitments to paying living wages across their supply chain and reporting on progress towards meeting this aim. These brands would be disclosing the number of workers in their supply chain covered by collective bargaining agreements or part of trade unions. These brands would be their mapping social and environmental impacts into their financial business model.

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THE FINAL SCORES

^{*}Brands ranked in numerical order by score out of 250, but shown as rounded-up percentage. Where brands have the same percentage score, they are listed in alphabetical order and grouped with others from same parent company

OVERALL ANALYSIS

Still a long way to go towards transparency

Even the brands who come out in the top range of scoring — those not even half way up the ladder — have a long way to go towards being transparent about their suppliers, supply chain management and their business practices.

The average score for all brands in the Fashion Transparency Index is 49 out of 250, roughly 20% of all possible points. Adidas and Reebok achieved the highest score of 121.5 out of 250 (49% of the total possible points)—followed by Marks & Spencer with 120 points and H&M with 119.5 points (48% of the total possible points).

While we are seeing brands begin to publish more about their social and environmental efforts, which is welcome and necessary, there is still much crucial information about the practices of the fashion industry that remains concealed, particularly when it comes to brands' tangible impact on the lives of workers in the supply chain and on the environment.

Transparent policies, opaque performance

Brands score relatively well for disclosing their policies and commitments but score fewer points when you drive into detail about what they do and the effects of their supply chain efforts.

Information is hard to find

This research was a long and rather arduous process. If you wanted to find out exactly what brands are doing and how they are performing on social and environmental issues. it is difficult – sometimes entirely impossible – to find this information. Information is often found many clicks away from the homepage of brands' websites or housed on microsites, not even on the brands' main website. You would need a lot of time to find the relevant information and would require nuanced knowledge to make sense of the information that brands' typically disclose.

Lots of fluffy communication

There were many instances where our researchers would trawl through a 300+ page annual report only to find a couple of sentences that counted for transparent disclosure on some of the key issues we were looking at. As a result, there is a lot of "noise" to cut through; in other words, pages and pages of information that don't tell you much about what brands are actually doing, or at least makes it difficult to decipher. Far more space is given to brands' values and beliefs than to their actions and outcomes.

No wonder even the most conscious consumer finds it all so confusing. How are we supposed to make informed decisions about what we buy when the information is either entirely absent or presented in such varied and diffuse ways?

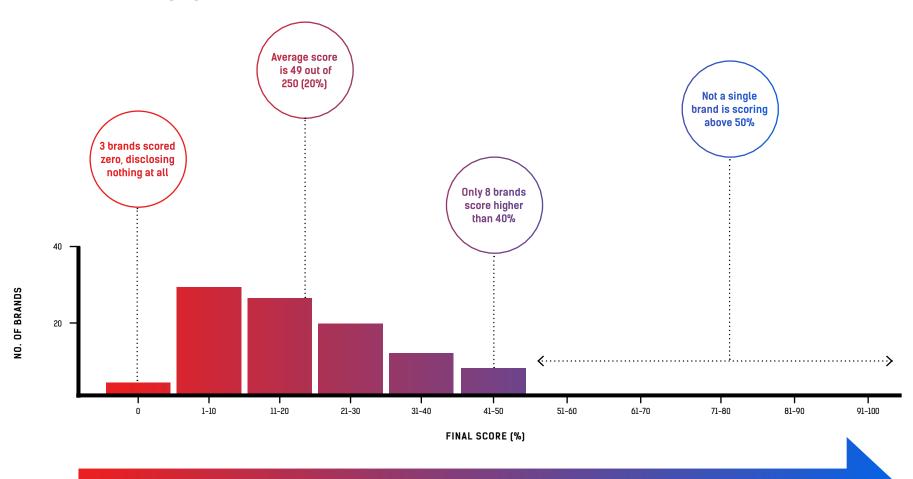
No common framework for disclosure

There is a lack of consistent standards for reporting on social and environmental issues. There is no common template. Brands present information in many different formats, using all sorts of language and industry jargon and present it using an array of different visuals.

It would be helpful if there was one common template by which brands disclosed social and environmental policies, practices and performance, and if this template used common, easy-to-understand language and visuals.

But what's most needed is for governments to legally require that brands are disclosing supplier lists and social and environmental information using a common framework. Without this, brands will continue to willingly disclose only selected information and in whatever format they determine best.

QUICK FINDINGS

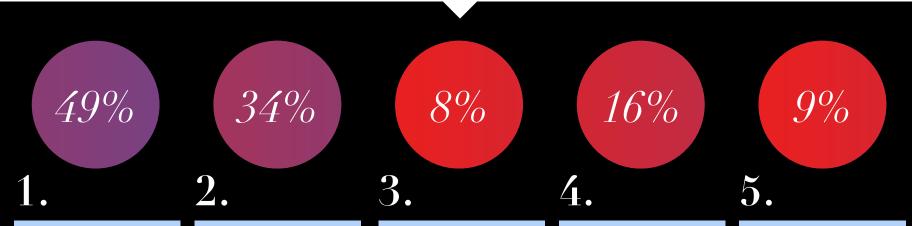


TRANSPARENCY

THE SCORES ACROSS THE 5 KEY AREAS



AVERAGE SCORES ACROSS THE SECTIONS



POLICY & COMMITMENTS

The highest concentration of brands scored in the 71–80% range with 11 brands scoring above 80% and 16 brands scoring 20% or less.

By and large, brands are disclosing the most about their policies and commitments on social and environmental issues.

GOVERNANCE

The largest number of brands (37) score less than 10%. 13 brands fall in the 41–50% range. Marks & Spencer is the only brand to score 100% meaning that they're disclosing who in the team is responsible for social and environmental issues, along with their contact details, board level accountability, and how other staff and suppliers are incentivised to improve performance.

TRACEABILITY

Overall brands are disclosing few details about their suppliers. The good news is that 32 brands are publishing suppliers lists (tier 1). 14 brands are publishing their processing facilities. No one is publishing their raw material suppliers. Gap Inc. brands come out on top because their supplier lists include detailed information such as types of products/ services and number of workers in each facility.

KNOW, SHOW & FIX

The highest concentration of brands (36) fall in the 11–20% range and many others (31) score less than 10%. Adidas and Reebok score highest in the 31–40% range. Brands often disclose their supplier assessment processes and procedures. However, brands share little information about the results of these efforts nor do brands share much about the effects of their efforts to fix problems in factories when found.

SPOTLIGHT ISSUES

Overall brands are disclosing little about their efforts to pay living wages or to support collective bargaining and unionisation. Few brands are disclosing their efforts to address overconsumption of resources. Only 8 brands scored above 31% and no brand scored above 50%.

1. POLICY & COMMITMENTS APPROACH

What are the brand's human rights and environmental policies and procedures for its own staff and suppliers?

We looked for policies & procedures covering the following issues:

- · Animal Welfare
- Anti-bribery, Corruption & Presentation of False Information
- Biodiversity
- · Child Labour
- · Community Engagement
- Discrimination
- · Diversity & Inclusion
- Effluents
- · Emissions & Energy
- Equal Pay
- Forced or Bonded Labour
- · Foreign & Migrant Labour
- Freedom of Association, Right to Organise & Collective Bargaining
- Grievances & Whistleblowing
- Harassment & Abuse
- Health & Safety

- Holidays, Sick Leave & Time Off
- Living Conditions/ Dormitories
- Living Wages & Benefits (e.g. bonuses, insurance, social security, pensions)
- Maternity Rights/ Parental Leave
- Notice Period, Dismissal & Disciplinary Action
- Recruitment & Terms of Employment
- Sub-contracting & Outsourcing
- · Use of Chemicals
- Waste & Recycling (Packaging/Paper)
- Waste & Recycling (Product/Textiles)
- Water Usage
- Working Hours

We typically found this information on brands' websites and in Employee Handbooks, Company Code of Ethics, Supplier Codes of Conduct, Supplier Guidebooks, sustainability and annual reports and sometimes even on career/job vacancies webpages.

SOCIAL & ENVIRONMENTAL PRIORITIES AND GOALS FOR THE FUTURE

In this section, we also looked at whether brands are disclosing their top human rights and environmental priorities (often this is something called a materiality matrix). Certain issues will be more relevant and of higher risk or importance to brands and its suppliers than others. We did not award points if brands count their entire sustainability or Corporate Social Responsibility (CSR) report as a materiality assessment.

We also looked to see whether brands are publishing their goals or a strategic roadmap for improving social and environmental impacts across the supply chain. We only counted these goals if they were reaching into the future, time-bound, measureable and if progress was reported publicly and annually.

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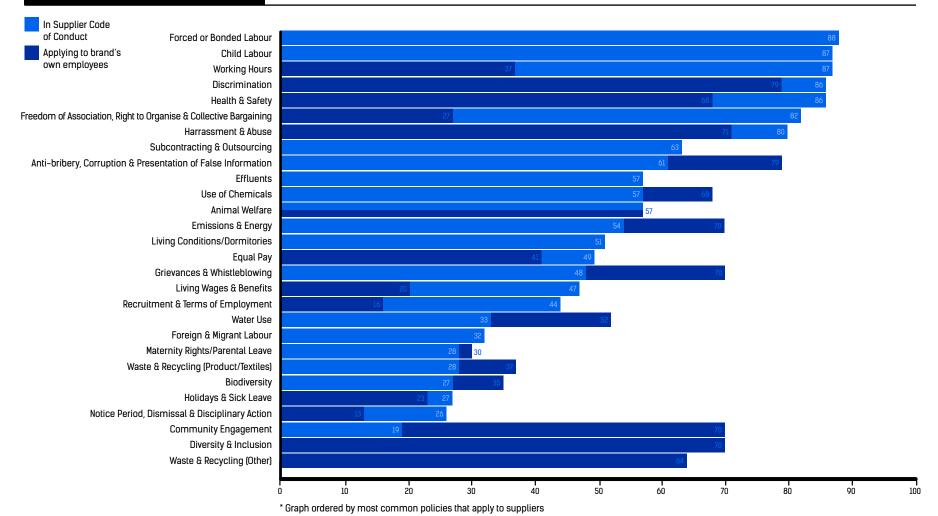
1. POLICY & COMMITMENTS

0-10%	11-20%	21-3	30%		31-40%		41-50%		51-60%		61-70%		71-80%		81-90%	91-100%	
Claire's Accessories 7 Ermenegildo Zegna 7 Chanel 3 Matalan 1 Dior 0 Heilan Home 0 s.Oliver 0	Calzedonia Dillard's Aéropostale	15 Ross S 15 Monso 12 Anthro 11 Urban 11 Lacost Under Americ	o mbucanas Stores con opologie Outfitters te	29 27 27 27 26 23 23 23 23 21	JCPenney Ralph Lauren Columbia Sportsweal J.Crew Guess Champion Hanes Amazon Giorgio Armani Miu Miu Prada Burlington Triumph	40 40 37 35 34 33 32 32 31 31	New Balance Zalando Benetton Renner Victoria's Secret Hudson's Bay Sak's Fifth Avenue Kohl's Mango	50 46 45 43 42 42	Hermès Lands End Macy's Uniqlo	60 59 57 56 56 55 55 51 51 51	Walmart Primark Louis Vuitton ASOS Asics Corporation Target Tesco Lululemon	68 67 66 65 64 64 61	Esprit Hugo Boss Topshop Bottega Veneta Gucci YSL Banana Republic Gap Old Navy Converse Jordan Nike Levi Strauss & Co Burberry C&A Gildan Activewear	79 79	Pull&Bear Zara Calvin Klein	Puma Marks & Spencer Adidas Reebok H&M	97 94 93 93 91

^{*}Brands ranked in numerical order by score out of 250, but shown as rounded-up percentage. Where brands have the same percentage score, they are listed in alphabetical order and grouped with others from same parent company

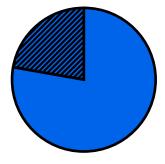
1. POLICY & COMMITMENTS FINDINGS

HOW MANY BRANDS PUBLISH POLICIES?*

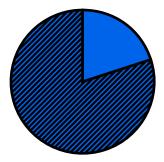


1. POLICY & COMMITMENTS FINDINGS

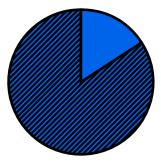
HOW MANY BRANDS PUBLISH POLICIES?



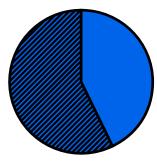
78 brands report about their community engagement activities at home or in sourcing countries



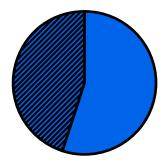
Only 20 brands disclose procedures that address maternity rights



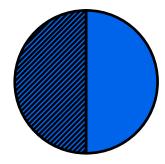
Only 16 brands disclose how worker dormitory policies are put into practice



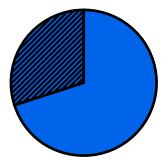
43 brands publish a materiality assessment for high risk supply chain issues



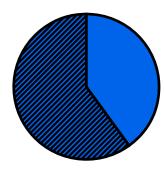
55 brands publish goals to improve social and environmental impact



50 brands report on some progress towards these goals



70 brands describe health & safety procedures



Only 40 brands disclose how child labour policies are put into practice

1. POLICY & COMMITMENTS IMPLICATIONS

Transparency on policies and processes but opacity on performance and impact

Brands are disclosing the most information about their policies, procedures and commitments on social and environmental issues (section 1 and the first part of section 4 of the methodology). Brands often publish a Code of Business Ethics, a Supplier Code of Conduct and some sort of annual report covering their CSR and sustainability initiatives.

Publishing these policies, procedures and commitments is important because it helps increase accountability. If a brand is found not to be making good on its promises, it risks damaging its reputation and as a result its bottom line.

We were looking for an array of social and environmental policies (see pp 27–29) for brands' own employees and their suppliers. We found that 98% were publishing some relevant policies (only three brands scored zero). Of the 26 supplier policies, 36 brands are publishing 18 of these policies.

Over 87% of brands are publishing seven of the 26 supplier policies. Only three brands are not disclosing any policies. Some brands' policies are nothing more than a one-line sentence, while other brands might include several pages of detailed policy in a supplier code of conduct. We awarded the same points for both.

Brands' supplier policies frequently cover the most egregious issues such as child labour (87% of brands have a policy on this issue); discrimination (86%); freedom of association (82%); forced labour (88%); harassment and abuse (80%); health & safety (86%); and working hours (87%). Surprisingly only 32% of brands' supplier policies cover foreign and migrant labour, people who are an increasingly important and vulnerable part of the garment industry workforce, according to SOMO.

However, 18 brands do not disclose a policy on Freedom of Association and the Right to Organise, 14 brands do not disclose a policy on health and safety, and 13 brands do not disclose a policy on child labour in the facilities where their clothes are made.

Less than half the brands disclose a policy on textile waste and just 33% of brands publish a policy on water use at the manufacturing level.

When it comes to putting policies into practice, brands are disclosing most about their procedures on issues such as community engagement, carbon emissions, health and safety and recycling at the company level. They are disclosing far less about putting policies into practice at the supplier level, especially on issues such as worker dormitories, maternity rights and recruitment.

55 brands are publishing time-bound commitments to improving their social and environmental impacts, of which 50 are reporting on progress towards achieving their goals.

Brands are disclosing the least about their actual performance, impacts and progress on social and environmental issues. Far fewer brands are disclosing the results of the factory assessment process and what impacts their supply chain efforts are having towards improving conditions for workers in supplier facilities. This means the public has virtually no way of knowing if brands' policies and procedures are truly effective and driving improvements for the people making our clothes. More on this point later in section 4.

Brands need not only to be transparent about their policies and procedures but also put more focus on the actual outcomes of their efforts to manage and improve human rights and environmental impact.

2. GOVERNANCE APPROACH

Who in the company is responsible for social and environmental impacts?

In this section, we were looking for the name and role of the person with lead responsibility in the brand for social and environmental performance. We also scored brands on whether they published the direct contact details for this person, or at least contact details for a relevant department such as the sustainability/CSR team.

We also looked for the name of a board member or board committee who is responsible for social and environmental issues and how their oversight is implemented. This is typically the remit of an Ethics or Sustainability Committee at board level.

Employee and Supplier incentives

Finally, we looked to see if brands are disclosing how their employees beyond the sustainability/CSR team (designers, buyers, sourcing managers, etc.) are incentivised (through performance targets or bonuses) to achieve improvements in social and environmental impacts.

We also looked for the same sort of incentives (such as long-term sourcing commitments) tied to suppliers' social and environmental improvements.

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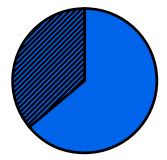
2. GOVERNANCE

0-10%	11-20%	21-30% 31-40%	41-50%	51-60%	61-70%	71-80%	81-90%	91-100%
Burlington 8 Columbia Sportswear 8 Costco 8 Giorgio Armani 8 Guess 8 J.Crew 8 Kohl's 8 LOFT 8 Miu Miu 8 Prada 8 New Look 8 Nordstrom 8 Ross Stores 8 Aéropostale 0 Amazon 0 Anthropologie 0 Urban Outfitters 0 Claire's Accessories 0 Dior 0 Express 0 Forever 21 Heilan Home 0 Hermès 0 Lacoste 0 Lands End 1 LL Bean 0 Macy's 0 Mexx 0 Michael Kors 0 Neiman Marcus 0 Pernambucanas 0 Primark 0 Russell Athletic 0 s.Oliver 1 Triumph 0 Victoria's Secret 0	Matalan 17 New Balance 17 Renner 17	George at Asda 25 American Eagle JCPenney 25 Calzedonia Mango 25 Chico's Monsoon 25 Louis Vuitton Under Armour 25 Uniqlo	33 Massimo Dutti 50 33 Pull&Bear 50 33 Zara 50 33 Champion 42 43 Hanes 42 43 COACH 42 Ermenegildo Zegna 42	Converse 58 Jordan 58 Nike 58 Dillard's 58 Next 58 Target 58 The North Face 58 Timberland 58 Wrangler 58 TJ Maxx 58 Zalando 58	ASOS 67 Banana Republic 67 Gap 67 Old Navy 67 H&M 67 Calvin Klein 67 Tommy Hilfiger 67 Levi Strauss & Co 67	Gucci 75 YSL 75 C&A 75 Gildan Activewear 75 Puma 75	Hugo Boss 83 Tesco 83	Marks & Spencer 100 Adidas 92 Reebok 92

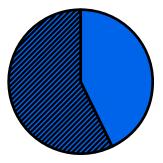
^{*}Brands ranked in numerical order by score out of 250, but shown as rounded-up percentage. Where brands have the same percentage score, they are listed in alphabetical order and grouped with others from same parent company

2. GOVERNANCE FINDINGS

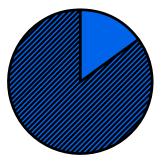
CAN YOU GET IN TOUCH?



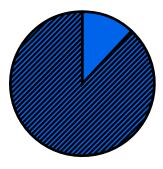
64 brands publish contact details for sustainability/ CSR department



43 brands disclose name/role of individual with lead responsibility on their websites

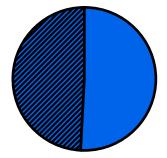


15 brands disclose contact details for this person

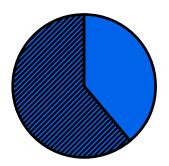


12 brands publish contact details specifically for enquiries about their supplier lists

ACCOUNTABILITY



51 brands publish board level responsibility

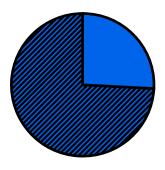


39 describe how board accountabilty is implemented in practice

PURCHASING PRACTICES



Only 7 brands disclose incentives tied to improvements in human rights and environmental performance for staff beyond sustainability team



26 brands disclose incentives tied to improvements in human rights and environmental performance for suppliers

2. GOVERNANCE IMPLICATIONS

Management and board level responsibility

If you wanted to find out more about the social and environmental practices of the brands in this Index, you might find it difficult to know whom to contact.

It may seem a simple ask but 36 of the 100 brands do not publish an email address or phone number so that people can contact the sustainability or CSR team directly. This means over one-third of the brands aren't easy to get in touch with should you want to know more about how their products are made, by whom and under what conditions.

Just over half of the brands (51%) publish the name of a board level committee that is responsible for sustainability and ethics issues, but only 39% describe how this works in practice.

Few real incentives for employees or suppliers to create change

When it comes to other company staff designers, buyers, merchandisers, etc. - only seven brands are disclosing whether employee performance or incentives (bonuses or other rewards) are tied to social and environmental impacts. Generally speaking, it's difficult to tell whether anyone other than the brands' board of directors and the sustainability/CSR team are held accountable for human rights and environmental protection. Meanwhile, roughly one-quarter (26%) of brands report how they incentivise their suppliers to make social and environmental improvements.

As explained by the Ethical Trading Initiative, brands' "practices such as last-minute changes to orders and ever-shorter lead times can contribute to excessive overtime, increased use of casual labour, and even unauthorised sub-contracting. And pressure from retailers to reduce prices can make it difficult for suppliers to pay workers a living wage."

Many brands talk about training staff and suppliers on social and environmental issues. However, if brands truly want to make a positive change, they should be publicising how they are incentivising changes at each stage of the product's creation from designing more sustainable products to sourcing better materials to better purchasing practices and rewarding responsible suppliers with more orders or better terms of business.

3. TRACEABILITY APPROACH

Are brands publishing lists of their suppliers and how detailed is this information?

This section focused on whether brands are publishing lists of their suppliers and what level of detail brands are disclosing about these suppliers.

For example, are brands sharing information such as:

- · The address of the facility
- The types of products/services made in each supplier facility;
- · Approximate number of workers;
- · Gender breakdown of workers:
- · % of migrant or contract workers;
- Date of last audit

Disclosing factories, processing facilities and raw material suppliers

We looked for supplier lists at three levels. First, are brands disclosing the factories where their clothes are made — e.g. the facilities that brands have a direct relationship with and typically do the cutting, sewing and final trims of products? Second, are brands disclosing processing facilities further down the supply chain — e.g. from ginning and spinning, through to sub-contractors, wet processing, embroidering, printing, finishing, dye-houses, laundries, and so on? And finally, are brands disclosing their suppliers of raw materials — e.g. primary substances such as fibres, hides, rubber, dyes, metals and so on?

We gave extra points if supplier lists are made available in a searchable format, cover more than 95% of their suppliers and have been updated within the past 12 months.

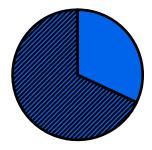
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3. TRACEABILITY

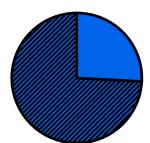
^{*}Brands ranked in numerical order by score out of 250, but shown as rounded-up percentage. Where brands have the same percentage score, they are listed in alphabetical order and grouped with others from same parent company

3. TRACEABILITY FINDINGS

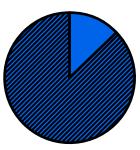
WHO'S PUBLISHING LISTS (TIER 1)?



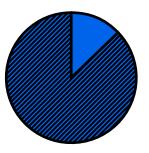
32 brands are publishing suppliers lists (which covers at least tier 1)



26 include the facility address



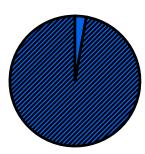
13 include the types of products made in the facility



11 include approximate number of workers in each facility

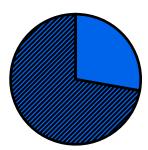


5 include gender breakdown of workers in each facility

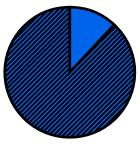


3 publish the facility phone number or email

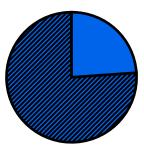
WHO'S PUBLISHING BEYOND TIER 1?



28 make this list available in a searchable format



12 disclose that this list covers overs 95% of their facilities



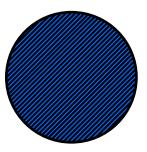
24 have updated their supplier list at least in the past 12 months



14 brands publish processing facilities



9 include the facility address



O brands are publishing suppliers of raw material

3. TRACEABILITY IMPLICATIONS

Publishing supplier lists with increasing level of detail

Since April 2016 several brands have published their supplier lists. Marks & Spencer has launched an interactive map of its suppliers in both food and clothing, which spans 53 countries and covers 1,229 factories employing 787,331 workers. ASOS has published a list of its own-brand suppliers. and Uniqlo revealed the names and addresses of 146 of its core factory partners. In the past year Benetton, C&A, Esprit, Gap, and VF Corporation (which owns more than 20 brands including The North Face, Timberland, Vans and Wrangler) have each disclosed the names and addresses of the factories that manufacture their clothing around the world. Last year we surveyed 40 big fashion companies and only five were publishing supplier lists. This year 32 of 100 brands are publishing supplier lists (tier 1).

10 of these brands include both the factories where their garments are cut, sewn and trimmed (known as tier 1) and their facilities where garments are printed, dyed, finished or otherwise processed in an earlier stage of production (known as tier 2). Adidas, Reebok, Gap, Banana Republic, Old Navy, H&M, Hermès, Levi Strauss, Puma and Target are disclosing suppliers beyond tier 1. Bershka, Massimo Dutti, Pull & Bear, Zara publish a list of their wet processing facilities but not a list of their manufacturers.

No one is publishing a list of raw material suppliers, so there is no way of knowing where their cotton, wool, leather or other fibres come from or who produce them.

Getting a clearer idea of #whomademyclothes

Brands publish supplier lists with varying degrees of detail. Some brands simply publish the name and country where their factories are located. Over 80% of the brands publishing supplier lists (tier 1) include a location/address of the facility and less than half of those disclose what types of products are made in each facility.

Some brands publish a portion of their factories but not a complete list (e.g. Uniqlo just publishes its core factory partners).

Brands tend to update their supplier lists annually. However, Target says it updates its list quarterly and ASOS says it will do so every two months.

"The growing number of apparel industry leaders disclosing factories is good news for workers, the industry, and consumers," says Aruna Kashyap, senior women's rights counsel at Human Rights Watch.

"Brands that do not disclose are holding out on a critical tool that can promote worker rights. They should stop making excuses."

We will be joining other NGOs and unions in encouraging more brands to publish their supplier lists with greater level of detail. We would hope that consumers will ask brands to publish these lists too.

Publishing supplier lists is important, but what we do with these lists will become imperative for creating real positive change. The next step is to focus on ensuring these supplier lists are most useful for consumers, NGOS, unions and workers themselves.

4. KNOW, SHOW & FIX APPROACH

How are brands assessing the implementation of its policies? Do they share the results of these assessments?

We awarded extra points if brands disclosed:

- The decision-making process for taking on new suppliers;
- How frequently assessments are conducted (e.g. every 12 months);
- How many assessments are announced in advance verses surprise factory visits;
- How many assessments are double-checked for accuracy;
- And whether assessments include worker representatives, unions or labour rights NGOs.

Know

How do brands go about assessing suppliers to make sure they're meeting their policies? We looked for a description of brands' supplier assessment processes (typically factory audits).

Show

We looked at whether brands are disclosing the results of their supplier assessments, either as a summary of issues found in factories or at a more granular level (e.g. disclosing findings by individual factory).

Fix

Finally, we looked at what brands are publishing about how they fix problems in factories when discovered through the assessment process. How do brands remediate issues, and what do they do with outstanding orders when problems are being addressed or are not fixed at all? Do brands have confidential whistleblowing procedures in place for both its own employees and for workers? Are brands disclosing the results of these efforts to fix problems found in factories (typically, these are called Corrective Action Plans)?

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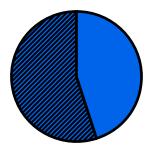
4. KNOW, SHOW & FIX

0-10%		11-20%		21-30%		31-40%		41-50%	51-60%	61-70%	71-80%	81-90%	91-100%
Columbia Sportswear	9	Burberry	20	Bershka	31	Adidas 3	39						
Victoria's Secret	9	Calvin Klein	19	Massimo Dutti	31	Reebok 3	39						
Amazon	8	Tommy Hilfiger	19	Pull&Bear	31	H&M 3	37						
Chico's	8	Macy's	19	Zara	31	Marks & Spencer	37						
Pernambucanas	8	Abercrombie & Fitch	17	COACH	28	Banana Republic 3	36						
Triumph	8	Lululemon	17	Tesco	28	Gap 3	36						
Anthropologie	7	Topshop	17	Esprit	27	Old Navy 3	36						
Urban Outfitters	7	Asics Corporation	16	Primark	27	Puma 3	36						
Ross Stores	7	Champion	16	Russell Athletic	25	C&A 3	33						
Neiman Marcus	5	Hanes	16	Target	25								
Burlington	4	Converse	16	Uniqlo	25								
Claire's Accessories	4	Jordan	16	Costco	24								
Ermenegildo Zegna	4	Nike	16	George at Asda	24								
New Balance	4	Lands End	16	Hudson's Bay	24								
Express	3	Next	16	Sak's Fifth Avenue	24								
Giorgio Armani	3	Renner	16	Bottega Veneta	23								
Miu Miu	3	ASOS		Gucci	23								
Prada	3	Guess	15	YSL	23								
Monsoon	3	JCPenney	15	Gildan Activewear	23								
Ralph Lauren	3	LOFT	15	The North Face	23								
Forever 21	1	Nordstrom	15	Timberland	23								
Hermès	1	Aéropostale	13	Wrangler	23								
LL Bean	1	Calzedonia	13	Levi Straus & Co	21								
Matalan	1	Kohl's	13	Walmart	21								
Mexx	1	Michael Kors	13										
Chanel	0	TJ Maxx	13										
Dior	0	American Eagle	12										
Heilan Home	0	Benetton	12										
Lacoste	0	Dillard's	12										
Louis Vuitton	0	Hugo Boss	12										
s.Oliver	0	J.Crew	12										
		Mango	12										
		Under Armour	12										
		Zalando	12										
		Jack & Jones	11										
		New Look	11										

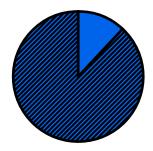
^{*}Brands ranked in numerical order by score out of 250, but shown as rounded-up percentage. Where brands have the same percentage score, they are listed in alphabetical order and grouped with others from same parent company

4. KNOW, SHOW & FIX FINDINGS

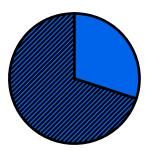
SUPPLIER ASSESSMENTS



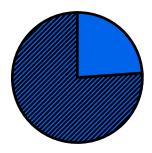
45 brands disclose their assessment process and general findings at tier 1



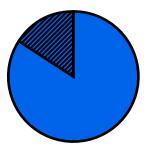
Only 12 brands are disclosing general assessment findings for facilities beyond tier 1



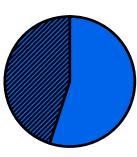
30 brands disclose how many supplier assessments are announced vs. surprise visits



24 brands describe involving unions, worker representatives or labour rights NGOs in these assessments



84 brands disclose information about their supplier assessment process

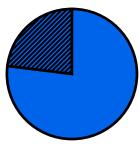


55 brands disclose how frequently assessments are conducted

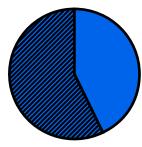
ADDRESSING PROBLEMS



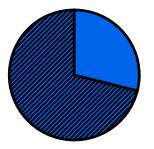
Only 12 brands disclose how many factory assessments are checked for accuracy



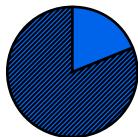
77 brands disclose a whistleblowing procedure for employees



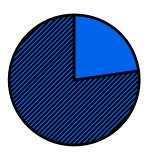
43 brands disclose a grievance mechanism process for suppliers and workers



29 brands include the grievance mechanism in the Supplier Code of Conduct



19 brands disclose how workers are informed about this grievance mechanism



23 brands disclose how many of their factories have Corrective Action Plans in place

4. KNOW, SHOW & FIX IMPLICATIONS

Brands focused on knowing but not showing or fixing

The vast majority of brands (84%) describe having established factory assessment procedures in place. Factory audits seem to be most brands' main tool for assessing and managing social and environmental issues.

However, audits have faced widespread criticism by NGOs in recent years. The Ethical Trading Initiative has said that: "Time and again, audits fail to reveal a true picture of what conditions are like. Most audits represent a snapshot of a given point in time – in other words, they don't show the situation before or after an audit. Not only that, standard audit methodologies rarely allow for digging deep to discover the root causes of workers' rights violations, or for assessing the risk of future violations. For example, a typical audit may reveal the existence of child labour, but it will not identify the reasons why children are working."

"Despite the hundreds of thousands of social compliance audits conducted each year to ensure minimum workplace conditions in companies' supply chains, there is little evidence that they alone have led to sustained improvements in many social performance issues, such as working hours, overtime, wage levels and freedom of association," argues Shift, the leading centre of expertise on the UN Guiding Principles on Business and Human Rights.

In other words: audits help diagnose, but they don't cure. Audits can also be vulnerable to deception – falsifying information, double books, bribes and coaching workers for interviews, which you can read more about in this report from Traidcraft. If audit information is made public and could be contested, this may be motivation not to falsify information in the first place.

Less than half the brands (45%) publish summarised findings of their factory assessments, 23% of brands disclose the number of their factories that are undergoing Corrective Action Plans (CAP), an industry term that describes the process of identifying failures in factories and coming up with a plan to fix them. Disclosing audit information and Corrective Action Plans helps everyone understand what progress is or isn't being made to improve conditions in supplier facilities. This is a crucial component of both the Alliance for Bangladesh Worker Safety and the Bangladesh Accord on Fire and **Building Safety programmes, which** publish inspection reports deliberately as an incentive for factories to improve safety conditions in a timely manner and to ensure that safety findings are properly addressed. 45 of the brands included in the Fashion Transparency Index are signatories of these initiatives and therefore only their Bangladeshi factories and remediation efforts are disclosed

However, only 21 of these signatory brands publish their supplier lists, so you can cross check to see what progress is happening in their Bangladesh factories – although this would take you significant time and effort to cross check yourself. H&M is the only brand that is publishing each of their factories individual ratings (Platinum, Gold, Silver or Other).

We believe that disclosing actual audit information is crucial to driving change, but it needs to be done in a clear and understandable way.

We would like to see wider disclosure of assessment findings and remediation efforts, or at least more disclosure on the real-world effects of brands' efforts to manage and improve working conditions.

5. SPOTLIGHT ISSUES APPROACH

The Spotlight Issues were selected to align with Fashion Revolution's 2017 theme: Money, Fashion, Power. Throughout our advocacy efforts this year we have put the lens on the flows of money, pricing and wages, and imbalances of power through fashion's supply chains. The Spotlight Issues will change each year.

Money - Living Wages

Have brands made public commitments to pay living wages across the supply chain? We gave points to brands that have made a commitment to pay living wages only if they have disclosed a methodology. benchmark or process for achieving living wages (e.g. through collective bargaining). Brands who have signed up to Action, Collaboration, Transformation (ACT) or the Fair Labor Association's Fair Compensation Strategy were awarded points. We also looked to see if brands are disclosing progress towards meeting these commitments. More on this later.

Fashion - Business Model & Consumption of Resources

We wanted to see if companies are publishing anything that addresses the problem of overconsumption. This isn't an easy topic to measure.

We looked to see if brands are:

- Offering repair services in order to make products last longer;
- Reselling used clothing at retail level:
- Investing in circular resources and innovative technologies that will help reduce resource consumption and waste;
- Mapping social and/or environmental impacts directly into the company's financial statements.

Power - Unionisation & Collective Bargaining

Most brands have policies on Freedom of Association and the Right to Organise, but we wanted to see if brands are disclosing more about what this looks like in practice. We looked to see if brands were publishing the number of workers in its supply chain that are part of independent, democratically elected unions or covered by collective bargaining agreements. We also looked to see if any information was provided on how workers are informed of their right to join a union.

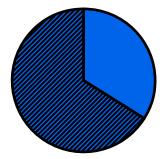
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5. SPOTLIGHT ISSUES

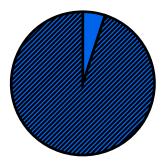
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5. SPOTLIGHT ISSUES FINDINGS

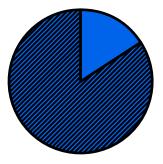
SNAPSHOT OF FINDINGS



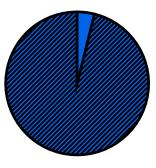
34 brands have made commitments to paying living wages to workers in the supply chain



But only 5 brands disclose how the company's purchasing practices enable the payment of a living wage



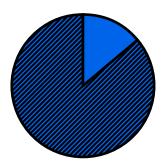
16 brands describe training suppliers on efficiency and productivity, which could help improve wages in theory



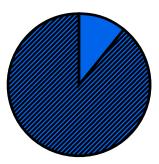
Only 4 brands report progress towards paying living wages to workers in the supply chain



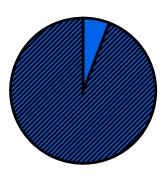
Only 3 brands say that they offer repair services, extending the life of products



14 brands report investments in circular resources or technologies towards reducing consumption



11 brands map social and environmental impacts into their financial statement



Only 6 brands disclose how many of their supplier facilities have independent, democratically elected unions in place

5. SPOTLIGHT ISSUES IMPLICATIONS

Commitments to collective bargaining and living wages

Many countries have legal minimum wages but this is often far below a rate which enables workers to support themselves and their family. Collective bargaining, meaning negotiations on the terms and conditions of employment between workers and employers, is essential to ensuring improved wages, better working conditions and sustainable livelihoods.

According to IndustriALL Global Union, over 90% of workers in the global garment industry have no possibility to negotiate their wages and conditions. Furthermore, foreign and migrant workers, homeworkers, sub-contractors, farmers and those who work part time or are contract labourers in the supply chain have the least bargaining power since they have indirect relationships with the brands. These workers often don't even know who exactly employs them (source: WIEGO).

12% of brands disclose the number of workers in their supply chain that are part of independent, democratically elected unions or covered by collective bargaining agreements.

H&M and Inditex (Bershka, Massimo Dutti, Pull & Bear, Zara) have signed Global Framework Agreements with IndustriALL Global Union, which represents 50 million workers in 140 countries in the mining, energy and manufacturing sectors. The Agreement with Inditex covers over a million garment workers in more than 6.000 supplier factories worldwide and sets out how the company will work with IndustriALL to review Freedom of Association and the Right to Bargain Collectively across its supply chains. The Agreement with H&M covers 1.6 million workers across 1 900 factories. and promises to work towards improved worker and employer dialogue at the suppliers producing for H&M. This has reportedly led to several new factory level unions registered, but this progress remains "fragile."

Topshop requires its suppliers to sign a Right to Organise Guarantee that is intended to ensure that workers' Freedom of Association rights are clearly communicated and understood by all workers.

Several brands (ASOS, C&A, Esprit, H&M. Bershka/Massimo Dutti/Pull & Bear/Zara, New Look, Next, Primark, Target, Tesco, Topshop) have recently joined ACT (Action, Collaboration, Transformation), an initiative between international brands and retailers. and trade unions to address the issue of living wages in the textile and garment supply chain. ACT "aims to improve wages in the industry by establishing industry collective bargaining in key garment and textile sourcing countries, supported by world class manufacturing standards and responsible purchasing practices." We believe that every brand should be signing up to ACT as a minimum step towards ensuring workers are able to negotiate for better conditions and living wages, meaning that they can afford a decent standard of living with some discretionary income wherever they live in the world. Since ACT is still relatively new, progress has yet to be seen.

34 of the brands have made some form of public commitment to work towards paying living wages to supply chain workers, but only four are reporting any progress against this commitment.

Only H&M, Marks & Spencer, New Look and Puma are disclosing the progress towards achieving living wages for workers in the supply chain. Two brands (H&M and Marks & Spencer) publish a policy to pay suppliers on time, and only five brands publish information about how their purchasing practices enable the payment of living wages, such as long-term purchase commitments with their suppliers or ensuring that costs paid to suppliers are enough to cover living wages.

Much more needs to be done and faster by brands to ensure that workers, from farm to retail, are paid fairly. This means brands urgently need to look at their own business models and purchasing practices. Currently, brands are not widely disclosing their efforts to address either of these issues.

5. SPOTLIGHT ISSUES IMPLICATIONS

The scale of production is immense

Brands are producing an eye-popping number of products each year. Inditex (who owns Bershka, Massimo Dutti, Pull & Bear, and Zara) reports having produced 1.17 billion products in 2015 (across all of their eight brands) made by 1,725 direct suppliers with 6,298 factories in 50 countries.

Esprit produced nearly 100 million items last year.

H&M Group reports having more than 161,000 employees, 4,300 stores globally across 64 markets, and works with approximately 820 suppliers and 1,900 factories, employing an estimated 1.6 million workers in the supply chain.

Adidas (including Reebok) works with 1,079 factories in 61 countries.

George at ASDA clothing is made in factories in more than 60 countries.

Even luxury brands are producing at a large scale; for example in 2015 Gucci conducted 1,120 audits on 659 suppliers.

Monsoon has a slightly different model of production by which some of their products are made by smaller producers and workshops. Through this model, Monsoon produces over 300,000 artisan made products annually, sourced from more than 1,500 artisans.

The sheer scale of production and consumption is a cause for concern, considering its environmental impact. While a few brands report initiatives to collect, recycle or donate used clothing, overall brands do not disclose many substantive efforts to address the problem of overconsumption.

Only three brands — Burberry, Gucci and Levi Strauss — are promoting repair services in order to extend the life of its products, while just 14 brands disclose investments in circular resources with the aim of keeping materials in perpetual use and out of landfills. Only 11 brands are disclosing steps to integrate social and environmental impacts into their financial model in order to steer business decisions based on more than just profits.



It can take over 700 gallons of water to make just one cotton T-shirt

[source: Value Village]



The carbon emissions generated by the clothing of the average household in the UK is equivalent to driving 6,000 miles in a car



95% of the clothes North Americans throw away into landfills each year could be reused or recycled

[source: Value Village]



In 2016, it is estimated that 150 billion items of clothing are delivered out of factories annually worldwide, a rise from 80 billion in 2012

VIEWPOINT



DR. MARK ANNER
DIRECTOR, CENTER FOR GLOBAL
WORKERS' RIGHTS
PENN STATE UNIVERSITY

Fashion Revolution once again has provided an important contribution to efforts to address sweatshop practices with its Fashion Transparency Index.

The Index is an eloquent reminder of how much work remains to be done in the industry. Far too many workers still face unacceptable conditions of work in apparel supply chains, including forced and excessive overtime, unsafe buildings, and subpar wages that do not cover basic living expenses.

Research has consistently shown that an organized and empowered workforce is often the most effective and democratic way to address many violations. Yet, Fashion Revolution's findings indicate that most brands are not disclosing information about unionization and collective bargaining agreements. In far too many countries, workers are often dismissed or threatened when trying to organize unions, raise wages, and establish more stable work. Many problems are the result of employer abuses and weak local governance.

Yet, significant problems are the result of sourcing practices that start at the top of global supply chains. This includes a worrisome pattern of reducing the price paid to produce apparel and shortening the time allotted to make and ship items. Such a price squeeze contributes to low wages and unsafe buildings. And the lead time squeeze engenders forced overtime and increased worker production quotas.

Sustainable supply chains require sustainable sourcing practices. The price brands pay to produce their garments should cover the costs of living wages and safe buildings, and the lead times brands allot to make their goods should allow for reasonable hours of work and reduced work intensity. Such good practices must extend through the entire supply chain, from tier 1 factories to home work.

"the time has come for brands and retailers to make their entire supply chains transparent"

As Fashion Revolution's effort indicates, the time has come for brands and retailers to make their entire supply chains transparent. The time has also come to establish sourcing practices that are conducive to the human development and empowerment of the workers who work so hard every day to make the clothes we wear.



WHAT SHOULD YOU DO WITH THIS INFORMATION?



CITIZENS

We hope the Fashion Transparency Index inspires people to ask brands #whomademyclothes demanding greater transparency.

At the moment none of us have enough information about where and how our clothes are made. We have the right to know that our money is not supporting exploitation, human rights abuses and environmental destruction. There is no way to hold brands and governments to account if we can't see what is truly happening behind the scenes. This is why transparency is essential.

We hope that the Fashion Transparency Index inspires us to think differently about the clothes we buy and wear. We hope it inspires more people to scrutinise the brands they buy and to consider how clothes might have been made, where, by whom, under what conditions and at what true cost. We hope this research activates you to try to find out more about the production processes and people behind what you wear.

To encourage brands to do more, you can take action in two ways:

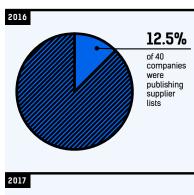
- Encourage more public disclosure from brands. You can do this by using social media to ask brands #whomademyclothes and by supporting campaigns that call for brands to publish their supplier lists and supply chain information;
- Write or call policymakers and ask them to do two things:
 - To implement regulation ensuring brands are responsible for the impact they have on the lives of the people working in their supply chains, at home and abroad;
 - Require brands to report transparently about their social and environmental impacts across the entire value chain using a common framework.

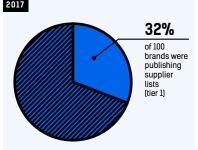
BRANDS AND RETAILERS

We hope the Fashion Transparency Index influences brands and retailers to publish more information about their policies, practices and progress on human rights and sustainability.

This year 32% of the 100 brands we surveyed are publishing supplier lists (tier 1). We are beginning to see increased disclosure. We hope that the Fashion Transparency Index influences more brands to disclose their supplier lists with increasingly detailed information — answering the question #whomademyclothes.

We hope the Fashion Transparency Index also sheds some light on how different brands are communicating their sustainability/CSR initiatives, highlighting where best practices and areas for improvement are emerging. We think it might be interesting for brands and retailers to see how they compare to each other in terms of public disclosure of supply chain information and social and environmental priorities.





We ask brands and retailers to take immediate, concrete steps to:

- Disclose your supplier lists in a searchable format and publish more easy-to-understand information about your social and environmental performance, progress and impacts across the entire supply chain;
- Improve sustainability/CSR communications make relevant information easier to find and more simple to understand;
- Publish direct contact details for the sustainability/CSR department on your website;
- Answer your customers' #whomademyclothes requests on social media with specific supplier information, not just your policies.

GOVERNMENTS AND POLICYMAKERS

Fashion Revolution believes that laws and regulations are key to transforming the fashion industry.

There are plenty of international standards set by the United Nations and related bodies such as the International Labor Organisation, and many countries actually have living wages, workers rights and environmental protections written into their Constitutions.

However, enforcement of existing laws is often absent, implementation is weak and there is little opportunity to address violations though the courts. This needs to change.

Transparency is beginning to become subject to legislation. France requires companies to report annually on environmental, social and corporate governance issues.

The UK Modern Slavery Act and California's Transparency in Supply Chains Act require companies to disclose their efforts to eradicate human trafficking and slavery from their supply chains. Last year President Obama signed into law a provision banning the import of goods made by child and forced labour into the U.S. The European Union is currently discussing a number of measures that would legally require companies to carry out riskassessments across their supply chains.

We hope the Fashion Transparency Index helps to demonstrate the need for mandatory due diligence and reporting. We would also like to see governments make companies and their executives legally responsible for what happens in the company's supply chains, regardless of whether the company has direct control or where in the world abuses may be happening. Your constituents deserve to know that the clothes they buy and wear have not contributed to exploitation and environmental degradation.

We ask that governments and policymakers take action in several key ways:

- Better implement and enforce existing laws that are meant to protect workers and the environment everywhere;
- Legislate and support transparency –
 i.e. mandatory due diligence and
 standardised disclosure by brands on
 social and environmental issues;
- Make companies and their executives at home accountable for what happens in the company's supply chains, regardless of whether the company has direct control or where in the world abuses may be happening.

NGOS, UNIONS AND WORKERS

We hope that the Fashion Transparency Index is useful for NGOs, trade unions and civil society groups who are working directly with producers and supply chain workers on human rights and environmental protection.

This research helps NGOs, unions and workers to understand what brands are publishing supplier lists, what information is being disclosed, where brands are producing and what policies and procedures brands say they have in place to protect workers and the environment. There are many pioneering NGOs working directly on the ground in producing countries, and we hope this information can help them keep brands accountable for what happens in their supply chains, wherever production is based.

We encourage NGOs and unions to:

- Join us in encouraging brands to publish supplier lists and more detailed supply chain information;
- Join us in asking policymakers for mandatory due diligence and standardised reporting;
- Support our call for citizens to ask brands #whomademyclothes.
- □ Please send us information about how you would like to see the fashion industry improve. Let's work together!

Fashion Revolution commits to supporting complementary campaign efforts by other NGOs, unions and workers, wherever possible.

AN IMPORTANT FINAL NOTE

We are **not** endorsing the brands included in the Fashion Transparency Index, regardless of how they score. By conducting this research, we are **not** promoting the fast fashion business model, which underpins many of the brands included in the Fashion Transparency Index.

Fashion Revolution encourages you to use your voice, your money and your power to transform the fashion industry.

Read our booklet 'How To Be a Fashion Revolutionary' to find out what more you can do.

Be Curious. Find Out. Do Something.

Finally, we ask you to please share this report with anyone you think might be interested.

"Now, in the hyper-connected and ever evolving world, transparency is the new power

BENJAMIN HERZBERG
PRIVATE SECTOR ENGAGEMENT
FOR GOOD GOVERNANCE,
WORLD BANK INSTITUTE

ACKNOWLEDGEMENTS



THANK YOU!

The Fashion Transparency Index report was written by Sarah Ditty, who leads on Fashion Revolution's policy and advocacy efforts. It was designed by Heather **Knight**, Fashion Revolution's lead on branding and communications, the person who is responsible for giving our movement its visual identity. Research was led by Sarah Ditty and Carry Somers, the co-founder and Global Operations Director of Fashion Revolution a huge thanks for their diligent efforts. A very heartfelt thanks to our brilliant research assistants, without whom this report would not have been possible -Eloisa Artuso, Sophia Calugay, Ilishio Lovejoy, Aidan Shaw, Sienna Somers and Manon Thomas. Thanks to Martine Parry for helping us reach out to press.

Thank you to the brands and their representatives who took the time to engage with us and complete the 2017 research questionnaire. We know that brands receive frequent requests for information from civil society and NGOs, and it's difficult to respond to them all and still get work done. Your participation is both vital and appreciated.

We would like to say a special thanks to **Dr Mark Anner**, **Subindu Garkhel** and **Jenny Holdcroft** for your important written contributions to this report and to the rest of our consultation committee: **Neil Brown, Ian Cook**, **Dr Alessandra Mezzadri** and **Heather Webb**. An absolutely enormous thank you to all the others who provided informal feedback on the methodology and report — you know who you are!

As always, huge thanks to the members of Fashion Revolution's Global Coordinating Team — Orsola de Castro, Ian Cook, Sarah Ditty, Roxanne Houshmand-Howell, Heather Knight, Martine Parry, Lucy Shea, Carry Somers and Jocelyn Whipple.

Thanks to Nikki Mattei for keeping our team in running order. Thanks to all of Fashion Revolution's Country Coordinators, who brilliantly and effectively power the movement. Thanks to Fashion Revolution's Global Advisory Committee for their enthusiasm and collaboration.

Thank you to **C&A Foundation** for your generous support.

C&A Foundation

Finally, we would like to thank all of you for reading this report and supporting Fashion Revolution.

Please consider donating financially to Fashion Revolution so that we can continue to create more resources, such as the Fashion Transparency Index, and spark an even wider global conversation about the impacts of our clothes.

With your help, we can create positive change!

DONATE: www.fashionrevolution.org/support-us

ANNEX 1: DEFINITIONS & ABBREVIATIONS

Auditing is the process of reviewing a company's finances, working conditions, and environmental practices. It uncovers risks to workers' safety and opportunities to improve working conditions.

(Source: Walk Free Foundation)

CSR (Corporate Social Responsibility) is a corporation's initiatives to assess and take responsibility for the company's effects on environmental and social wellbeing. The term generally applies to efforts that go beyond what may be required by law. (Source: Investopedia)

Collective bargaining is a process where employers and unions negotiate to determine fair wages and working conditions. (Source: ILO)

Due diligence is a process through which companies assesses their impacts on human rights and the environment and then take actions to reduce any negative impacts. (Source: United Nations Global Compact)

Freedom of Association is the right of individuals and workers to form and join groups of their own choosing in order to take collective action to pursue the interest of the members of the group.

(Source: ILO)

Grievance mechanism is a complaint process that can be used by workers, allowing them to voice concerns about working conditions without fear of punishment or retribution.

(Source: Verité)

Living wage is a wage a worker earns in a standard working week that is enough to provide for them and their family's basic needs – including food, housing, clothing, education and healthcare.

(Source: Clean Clothes Campaign)

Materiality Assessment is an exercise designed to gather insights on the relative importance of specific environmental, social and governance (ESG) issues. The insight is most commonly used to inform sustainability reporting and strategic planning. (Source: Greenbiz)

NGO (Non-governmental organisation) is a group that operates independently of any government, typically one whose purpose is to address a social or political issue. (Source: Oxford Dictionary)

Remediation is the action of fixing something, particularly reversing or stopping environmental damage or human rights abuses. A Corrective Action Plan is an agreement with a supplier on what needs to be remedied, when it is to be done, and who is responsible for which tasks.

(Source: ETI Norway)

Purchasing practices refers to a company's process of buying goods and services. This might include activities such as planning and forecasting, design and development, cost negotiation, sourcing and placing orders, production management and payment and terms.

(Source: Better Buying)

Supply chain / value chain refers to all the steps it takes to produce and sell a product, from farm to closet.

(Source: OECD)

Wet processing facilities are involved in the production of clothing whose activities typically involve rinsing, bleaching, dyeing, printing, treating or coating fabric and laundering.

(Source: Garment Merchandising blog)

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CHECK OUT THESE ORGANISATIONS FOR FURTHER RESEARCH:

Anti-Slavery International www.antislavery.org

Business & Human Rights Centre https://business-humanrights.org

Centre for Sustainable Fashion http://sustainable-fashion.com

Clean Clothes Campaign https://cleanclothes.org

Greenpeace www.greenpeace.org

Human Rights Watch www.hrw.org

Labour Behind the Label http://labourbehindthelabel.org

International Labor Rights Forum www.laborrights.org

Mistra Future Fashion http://mistrafuturefashion.com

The Centre for Research on Multinational Corporation (SOMO) www.somo.nl Please also visit www.workerdiaries.org to discover the Garment Worker Diaries, a yearlong research study of the lives and wages of 600 garment workers in Bangladesh, Cambodia and India, led by Microfinance Opportunities in collaboration with Fashion Revolution and supported by C&A Foundation.

"Transparency is not a choice. The only choice is, does it happen to you, or do you participate in it?

ALEX BOGUSKY

ABOUT FASHION REVOLUTION



Fashion Revolution is a global movement who want to radically change the way fashion is made, sourced and consumed. We believe in an industry that values people, the environment, creativity and profit in equal measure. We have teams in over 90 countries that want to see fashion become a force for good.

www.fashionrevolution.org





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"Transparency is a tool to continuously put under scrutiny our sustainabilitydriven theories, actions and their resulting effects

SIMONETTA CARBONARO CONSUMER PSYCHOLOGIST AND PROFESSOR OF HUMANISTIC MARKETING

