



APPAREL INDUSTRY TRENDS

FROM FARM TO FACTORY

FREE2WORK: THE STORY BEHIND THE BARCODE



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THE STORY BEHIND THE BARCODE:

APPAREL INDUSTRY TRENDS

FROM FARM TO FACTORY
2012

FREE2WORK, a project of



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Introduction | Apparel Industry Trends

Two decades ago it was standard practice for an apparel company to publicly deny any responsibility to workers in its supply chain. After years of worker and consumer activism, the debate has shifted and a number of companies have now developed extensive corporate social responsibility (CSR) programs. A handful of companies are using these systems to facilitate positive changes for workers. With Free2Work statistical data, we present an overview of apparel companies' current range of responses to arguably the most egregious ongoing abuse of workers: modern slavery.

Free2Work grades are an indication of the extent to which companies have traced their suppliers and established management systems throughout their supply chains. If used together, these systems can theoretically prevent child and forced labor. It is important to note however that, outside of a few metrics, Free2Work is only able to gather information on management systems and not on the working conditions they are designed to ameliorate; this is because the overwhelming majority of companies are not transparent with working condition information. Except in a few cases, companies have not made monitoring reports, corrective action plans, or line-by-line statistics on the implementation of code standards available to the public. Without this information, a direct analysis of the impact of these management systems on child labor, forced labor and many broader worker rights is not possible.

Free2Work does gather information on one concrete working condition that is also arguably the most accurate impact barometer: wages. Wages are of chief concern to workers, as evidenced by the fact that the payment of a living wage is demanded by virtually every major labor rights group.¹ Interestingly, our data finds that while a handful of the CSR management systems we assess correlate with a known improvement in wages, most do not: only a small number of brands report guarantees of higher-than-minimum wages at the factory level (see pg 3). This leads us to question whether the internal purpose of many of these systems is merely public image management. Regardless of the motive, it is clear that while in some cases the resources spent on CSR systems are significantly benefitting workers, in the majority of cases the impact on wages and broader working conditions is uncertain.

This report provides detailed information on fifty apparel companies' CSR practices: it assesses each management system in four categories: Policies, Traceability & Transparency, Monitoring & Training, and Worker Rights. Each Free2Work indicator correlates with a piece of a system that should, if appropriately used, enable improvement in working conditions and the elimination of modern slavery. We hold that child and forced labor are far less likely in supply chains that are

highly visible to companies and where workers have a voice to negotiate working conditions and speak out against grievances.

As the Clean Clothes Campaign has stressed, these components will likely only create positive impact if used in conjunction.² For example, a company can have strong written policies against modern slavery and gather information about supplier working conditions through in-depth monitoring, but unless it uses these standards and information to correct grievances, we would not expect it to create impact. Free2Work category grades represent the health of pieces of a system rather than the system as a whole, and should be evaluated within this broader context: while many brands have adopted the right policies and thus the most common Policies grade we allot is an A, the most common Worker Rights grade is an F.

Alongside a statistical overview of Free2Work data, this report offers more detailed snapshots of what some of the better-scoring companies are doing in specific compliance areas. A few of these featured companies are truly ahead of the curve in their use of best-practices. Several, however, are not comprehensively upholding worker rights; we provide examples of model initiatives and in some cases we have found that companies supporting model initiatives in one place are far from following best practice in other places. Despite these inconsistencies, we want to encourage companies to support stronger initiatives, such as the Freedom of Association Protocol in Indonesia or the Fire and Building Safety Agreement in Bangladesh. These issue-specific, direct stakeholder-brand-supplier agreements represent a new path for enabling workers' voice: an essential step in ensuring against forced or bonded labor or other contract abuse.

We also want to encourage companies to begin to measure and report the impact of their CSR systems, particularly in terms of wage gains for workers. These programs are only useful where they are creating concrete change for workers.

Despite the current information gap, the Free2Work data we present is important because it is the most comprehensive picture of these systems to date. We can see from it that, unlike in decades past, most well-known apparel companies now admit responsibility to their supply chain workers, and many are putting resources into facilitating change— even at the inputs and raw materials levels of their supply chains, where modern slavery is most rampant. We want to applaud the industry's step in this direction. Our hope is that the trend will continue, and that companies will use our ratings and analysis to improve, and to follow today's best-practice leaders into creating concrete improvements for workers tomorrow.

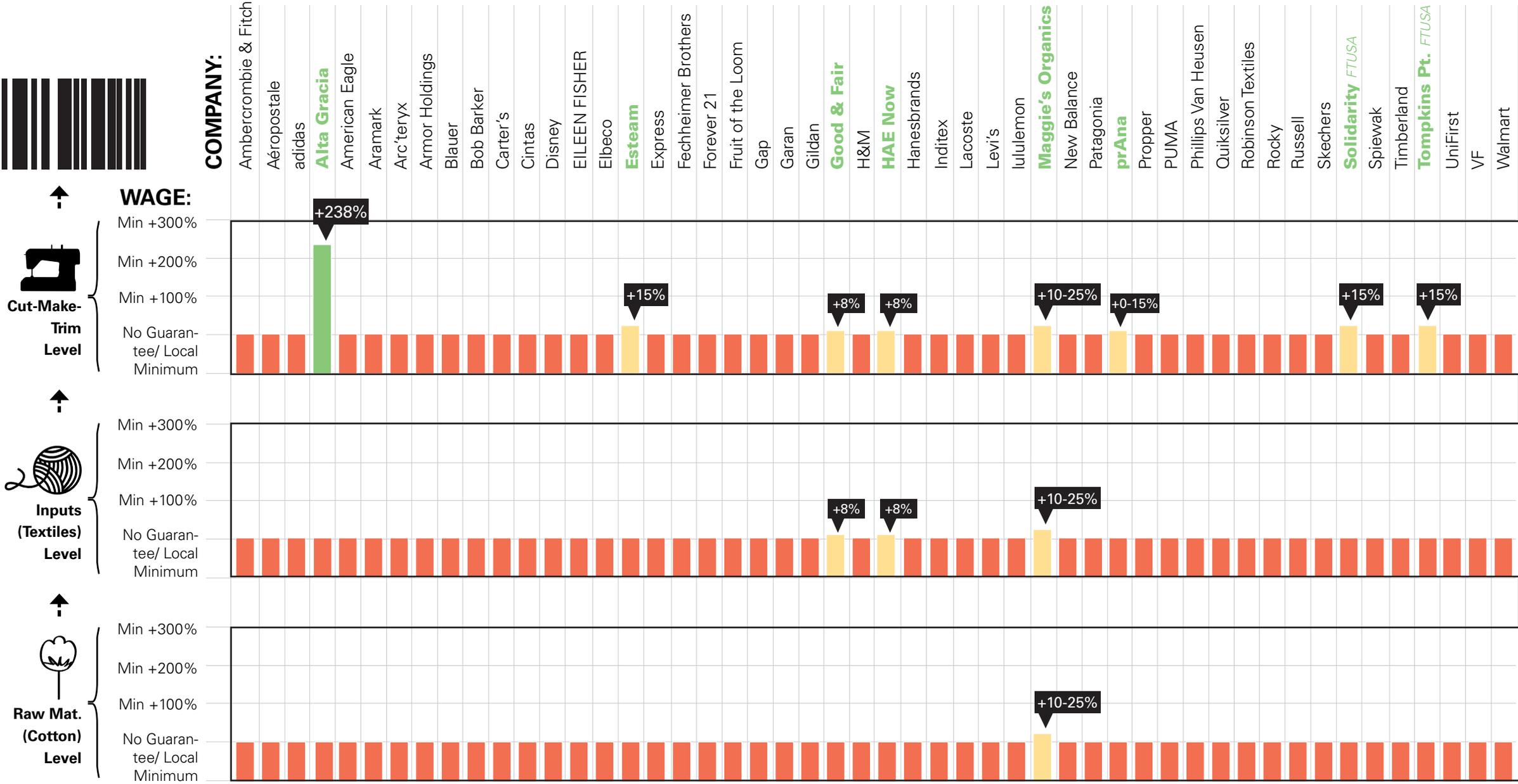
¹See ILRF Letter, "Comments for TransFair," 2009, for more details

²CCC: *How Weak Social Auditing is Keeping Workers in Sweatshops*, 2005

Introduction | Wage Impact: **WAGES COMPANIES GUARANTEE TO WORKERS**, BY PERCENT ABOVE LOCAL MINIMUM

There is no direct way to measure the existence of child or forced labor in a supply chain. However, we do know that where workers are treated fairly— where they have a voice about their conditions and receive adequate pay— modern slavery is by nature far less likely to exist. Beyond this, wages are a critical measure of the decency of a supply chain

because they are of chief concern to workers.¹ Interestingly, our data finds that while a handful of the CSR management systems we assess correlate with a known improvement in wages, most do not: only a small number of brands report guarantees of higher-than-minimum wages at the factory level.



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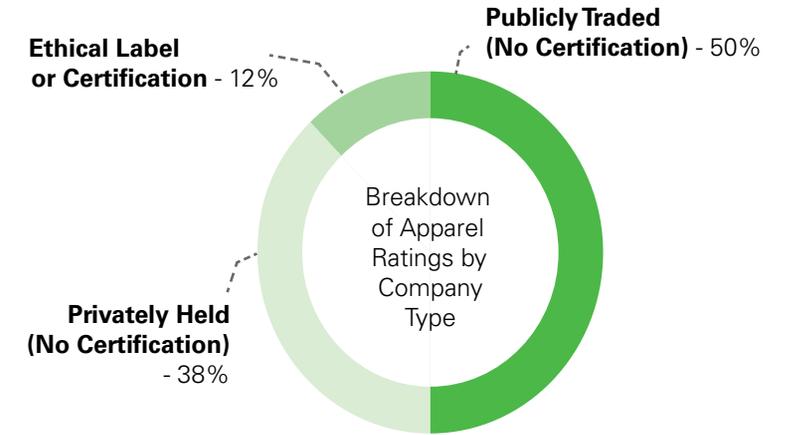
METHODOLOGY

This chapter provides an overview of Free2Work methodology. It also covers the scope of the report, and provides basic information about apparel supply chains.

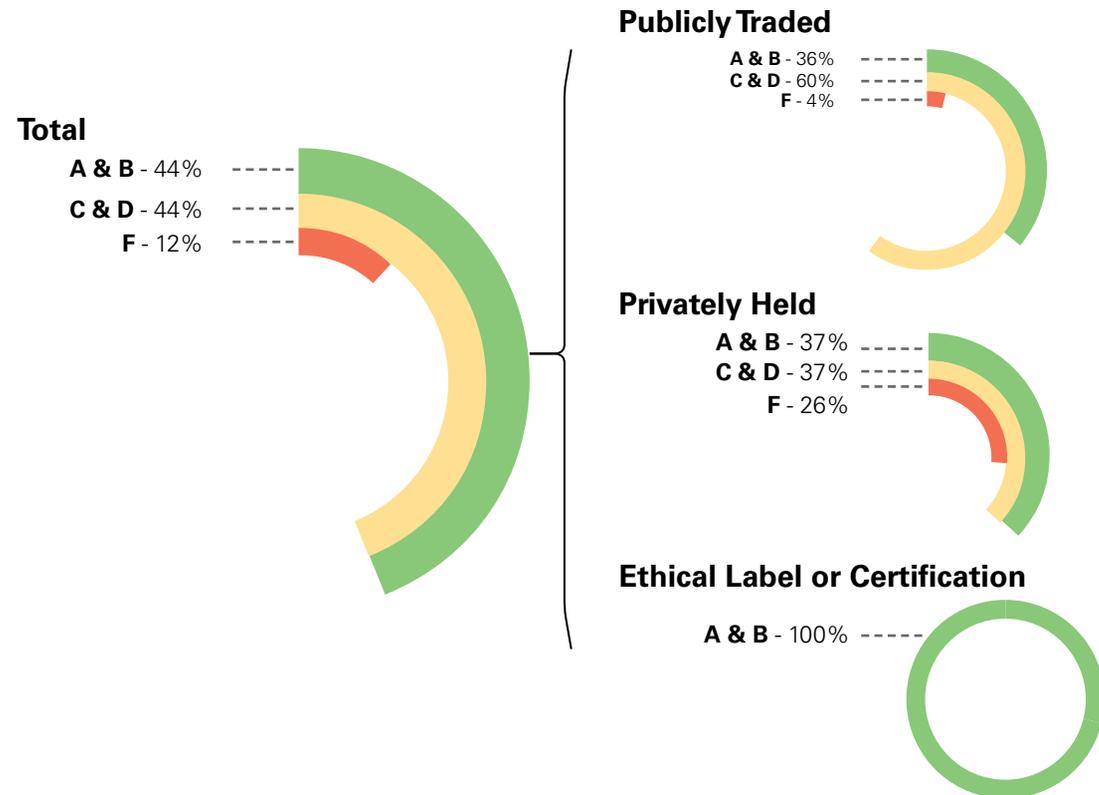
Methodology | Companies & Grades

COMPANY SELECTION PROCESS

The report looks at 50 key apparel companies' responses to the issues of child and forced labor. Many are well known names, but we also chose to include a handful of smaller companies that are seeking (whether successfully or not) to model best practices. Of these we predominately looked at Fairtrade USA certified supply chains, and also at Alta Gracia, a brand monitored by the Worker Rights Consortium. Thus the companies chosen do not necessarily as a whole represent an average slice of the apparel industry. To understand the numbers in the report, this statistical bias should be considered (see graphic to the right for details).



PERFORMANCE BY COMPANY TYPE



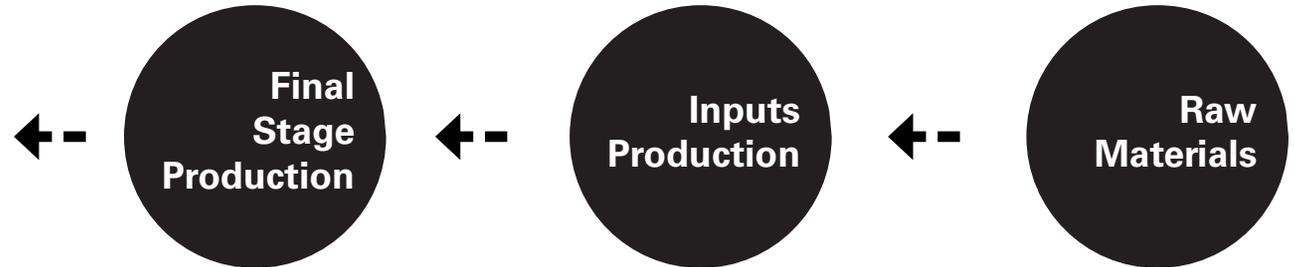
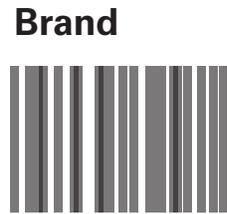
COMPANIES ASSESSED

The following are the companies covered in this report. Most companies own multiple brands; in general, their grades apply to these brands. See Index for full brand breakdown (pg 28). Companies that have not responded to Free2Work requests for information are marked with an astrix (*). In two cases we assessed a company's Fair Trade USA Certified products, but not its other products; these are marked with a pound sign (#). An exclamation point (!) indicates that a company is responsible for a labor rights violation about which there is a current public campaign (see Index pg 31 for links to these campaigns).

Ambercrombie & Fitch* !	Express*	Patagonia
Aéropostale*	Fechheimer Brothers*	PrAna
Adidas !	Forever 21*	Propper*
Alta Gracia	Fruit of the Loom	PUMA
American Eagle	Gap !	Phillips Van Heusen*
Aramark*	Garan*	Quiksilver*
Arc'teryx*	Gildan*	Robinson Textiles*
Armor Holdings*	Good & Fair	Rocky*
Blauer*	H&M !	Russell
Bob Barker*	HAE Now	Skechers*
Carter's* !	Hanesbrands	Solidarity Clothing*#
Cintas*	Inditex	Spiewak*
Disney	Lacoste*	Timberland
EILEEN FISHER	Levi's	Tompkins Point*#
Elbeco*	Lululemon	UniFirst*
Esteam*	Maggie's Organics	VF*
	New Balance	Walmart !

Methodology | Apparel Supply Chains

Free2Work evaluations focus on three main production phases of each supply chain:



Each evaluation looks at:

Cut-Make-Trim (CMT) Manufacturing

(Cutting, Sewing, Printing)

Each evaluation looks at one of the following phases:

Textiles Production

(Ginning, Spinning, Knitting, Dying, Embroidery)

Leather

(Tanning)

Plastic

(Processing, Moulding)

Each evaluation looks at one of the following phases:

Cotton

(Farming)

Wool, Rawhide, etc.

(Husbandry, Shearing, etc.)

Crude Oil

For Synthetic Fibres, Plastics, etc.

(Extraction, Refining)

SCOPE OF EVALUATIONS

Most apparel travels through various parts of the world and through many hands before reaching store shelves. Even within the apparel industry, there are different sorts of supply chains. Some garments pass through dozens of hands and countries. Other supply chains are more vertically integrated. The making of a garment involves harvesting, manufacturing, transportation, and many phases in between. Free2Work assessments focus on three stops along this chain: we evaluate each company’s management of the production of one main raw material, one main input, and the final manufacturing stage. In apparel, this usually means we look at cotton farming, textiles production (fabric-making), and cut-make-trim manufacturing (where fabric is cut and sewn into garments). Some companies are doing more to address issues in other phases, like leather production; in these cases we cater our assessment to best evaluate the company’s initiatives.

Methodology | Grading Process

A company's grades are a measure of its efforts to guard against the use of child and forced labor in its supply chain. They are based on publicly available information and data self-reported by the company. This publication provides an overview of fifty Free2Work apparel company ratings. Many of these companies own multiple brands; the assessments in this report look at 321 brands in total (see Index pg 26 for details).

In assessing a company, Free2Work asks a set of 61 questions about its production policies and practices. Free2Work assessment questions concern a company's management of raw materials, inputs and cut-make trim manufacturing, and fall into four categories:

POLICIES: We evaluate the brand's code of conduct, sourcing and subcontracting policies, and involvement with other organizations working to combat child and forced labor.

TRACEABILITY & TRANSPARENCY: We look at how thoroughly the brand understands its own supply chain, and whether it discloses critical information to the public.

MONITORING & TRAINING: We measure the adequacy of the brand's monitoring program to address the specific issues of child and forced labor.

WORKER RIGHTS: We assess the degree to which the brand supports worker well-being by ensuring that workers are able to claim their rights at work through organizing, and whether workers earn a living wage.

In conducting a brand evaluation, our research team first assesses a brand's own publications alongside relevant independent reports and data such as third party audit findings and non-governmental organization (NGO) publications. Next we send our questionnaire to the brand for information and comment, which we in turn review; we allot six to eight weeks for this process. Where a brand is non-responsive, we note this on its scorecard (see pg 3 for response details).

Free2Work grades are an indication of the extent to which companies have developed a set of management systems that, if used together, theoretically prevent abuses. It is important to note however that, outside of a few metrics, Free2Work is only able to gather information on management systems and not on the supply chain working conditions they are designed to facilitate; this is because the overwhelming majority of companies

are not transparent with working condition information. Except in a few cases, companies have not made monitoring reports, corrective action plans, or line-by-line statistics on the implementation of code standards available to the public. Without this information, a direct analysis of the impact of these management systems on child labor, forced labor and many broader worker rights is not possible.

Free2Work grades take into account the prevalence of child and forced labor in the countries in which companies report operating. Where companies source from suppliers in low risk areas, they are graded on a softer curve because it is expected that less stringent management systems are necessary to combat abuse in these regions, particularly where strong national rule of law exists.

High grades do not necessarily represent supply chains free of child or forced labor, but instead those that are better managed on a relative basis.

For more information on Free2Work's risk assessments and broader methodology, see www.free2work.org

State
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Industry:

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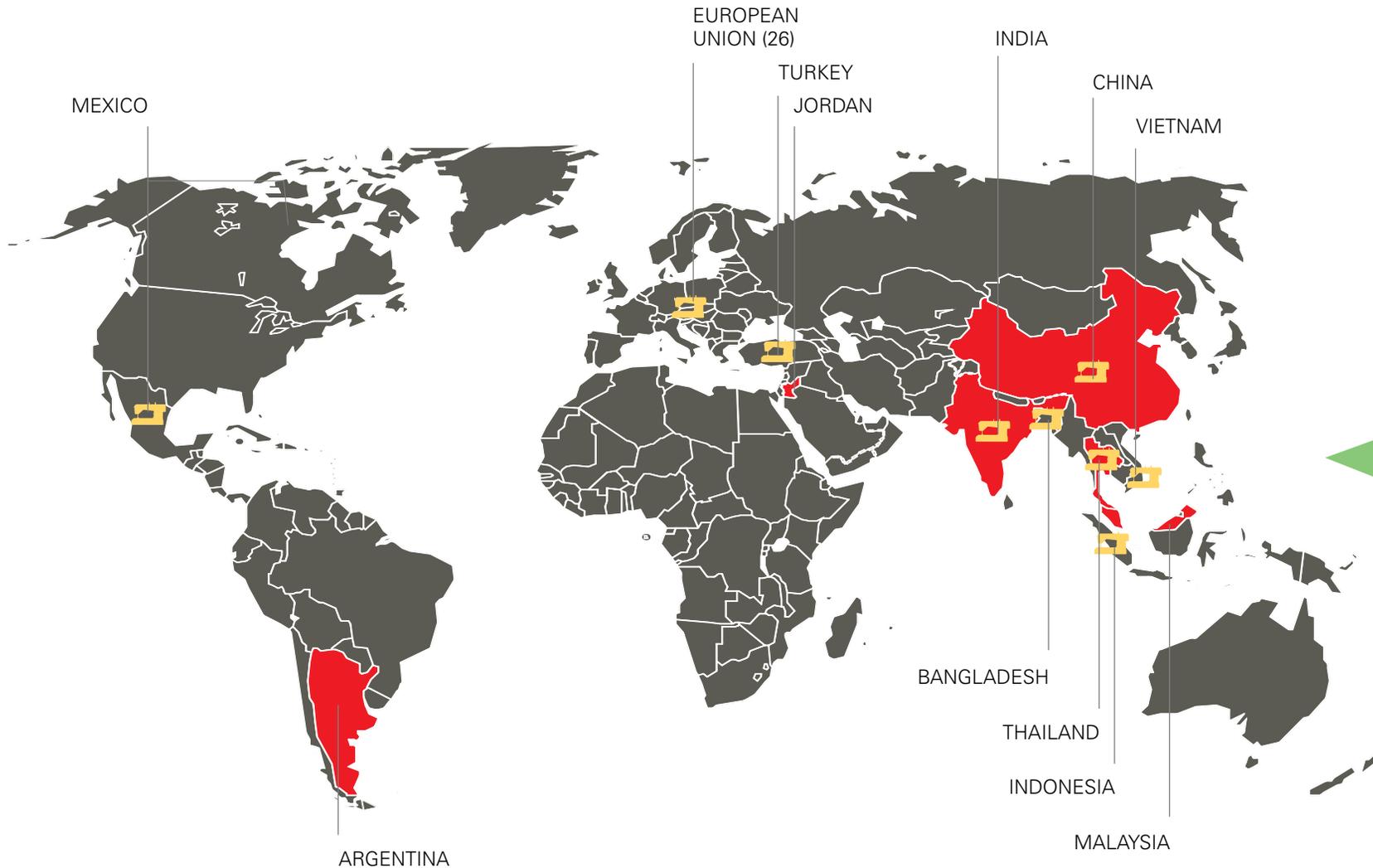
CHILD & FORCED LABOR

This chapter provides an overview of where geographically child and forced labor are used in apparel production today. We look at three main phases: cut-make-trim manufacturing, textiles production, and cotton growing and harvesting. Free2Work uses this information to understand companies' specific supply chain risks.

Child & Forced Labor in Cut-Make-Trim Manufacturing

Due to decades of international exposure, child and forced labor is less prevalent in export apparel factories today than it was twenty years ago. Nonetheless, people can be found in modern-day slavery even in some key global apparel production hubs. Six countries are known to use child and/or forced labor at the cut-make-trim level, including China and India – both top-ten global exporters.

Where is Child and Forced Labor Used?



KEY:



Yellow icons represent countries that lead the world in garment exports
(Source: World Trade Organization, 2008)



Red represents countries known to use child and/or forced labor in garment production
(Source: DOL List of Goods Produced by Child Labor or Forced Labor, 2011)

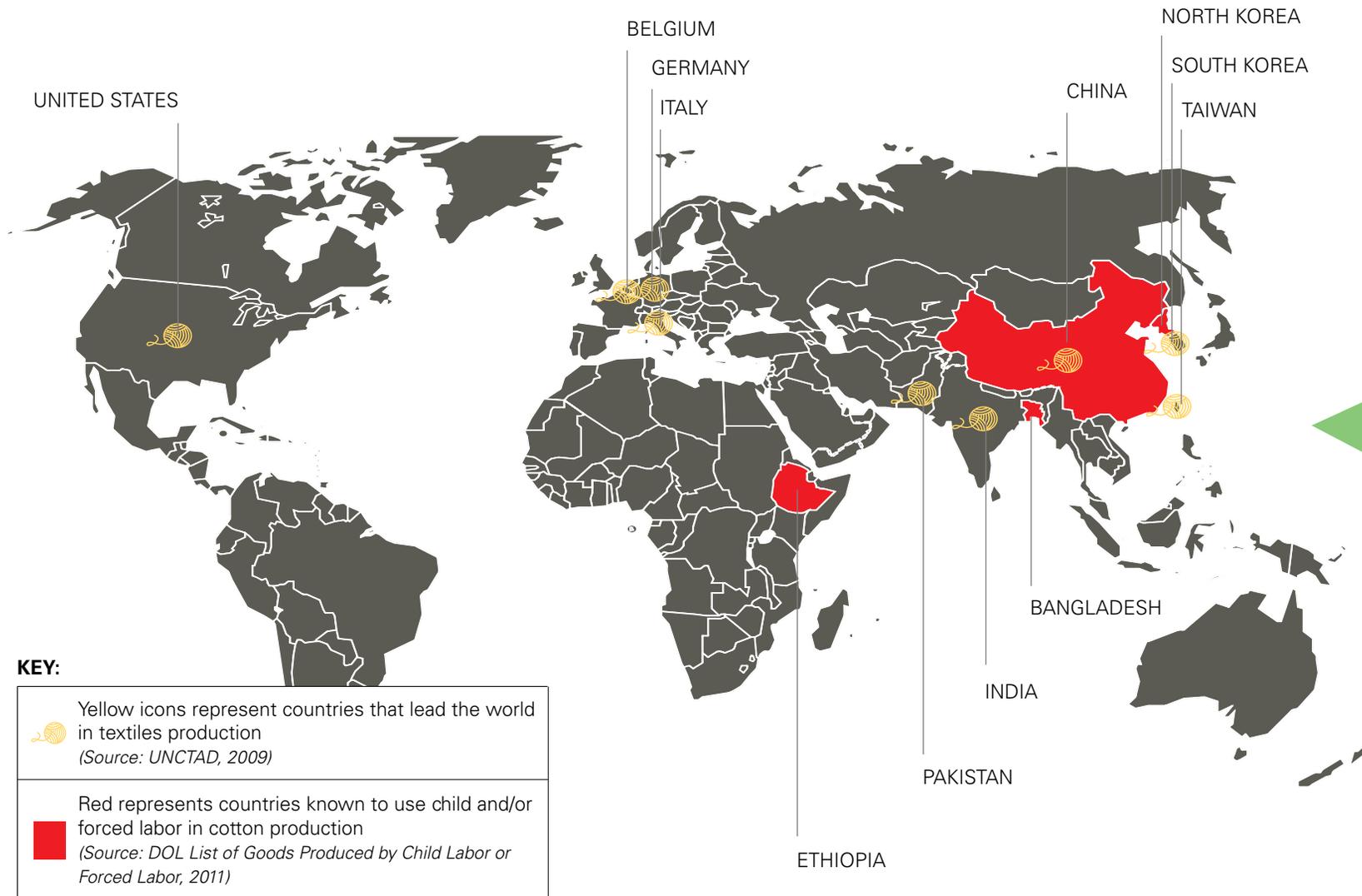
SPOTLIGHT: VIETNAM

Across Vietnam, tens of thousands of adults and children are held captive in state-sanctioned drug detention centers where they are forced to work and in some cases even tortured. These centers exist under the guise of providing “treatment” to the detainees. In reality they receive no medical care, but instead are forced to work to produce goods such as cashews, some of which are then sold on international markets. Captives who refuse to work can be placed in solitary confinement, beaten, or electrically shocked.

Child & Forced Labor in Textiles Production

As will be discussed in later pages, most apparel companies covered in this report monitor the working conditions in at least some portion of their cut-make-trim (CMT) factories. In contrast, the earlier phases of apparel production— those further upstream in the supply chain— often remain untraced, unmonitored and out of sight. This opacity significantly contributes the risk of abuse in these production phases. At the textiles level, child and/ or forced labor is documented in six countries.

Where is Child and Forced Labor Used?



SPOTLIGHT: INDIA

India is a global hub for textiles manufacturing. There are major incidences of child and forced labor in this industry.

In Tamil Nadu in southern India, young women are kept in what can amount to labor bondage through a practice dubbed the “Sumangali Scheme.” The girls, some younger than 14, are paid less than the minimum wage for one to three years. After this work term is finished, the employer pays the withheld wages to the family as a lump sum to be used as a dowry. In some instances the practice can mean forced labor: in these cases the employer binds the women to work by refusing to pay the withheld money unless they complete years of employment. Some of these women are also victims of other abuses such as forced overtime, sexual abuse and gender discrimination.

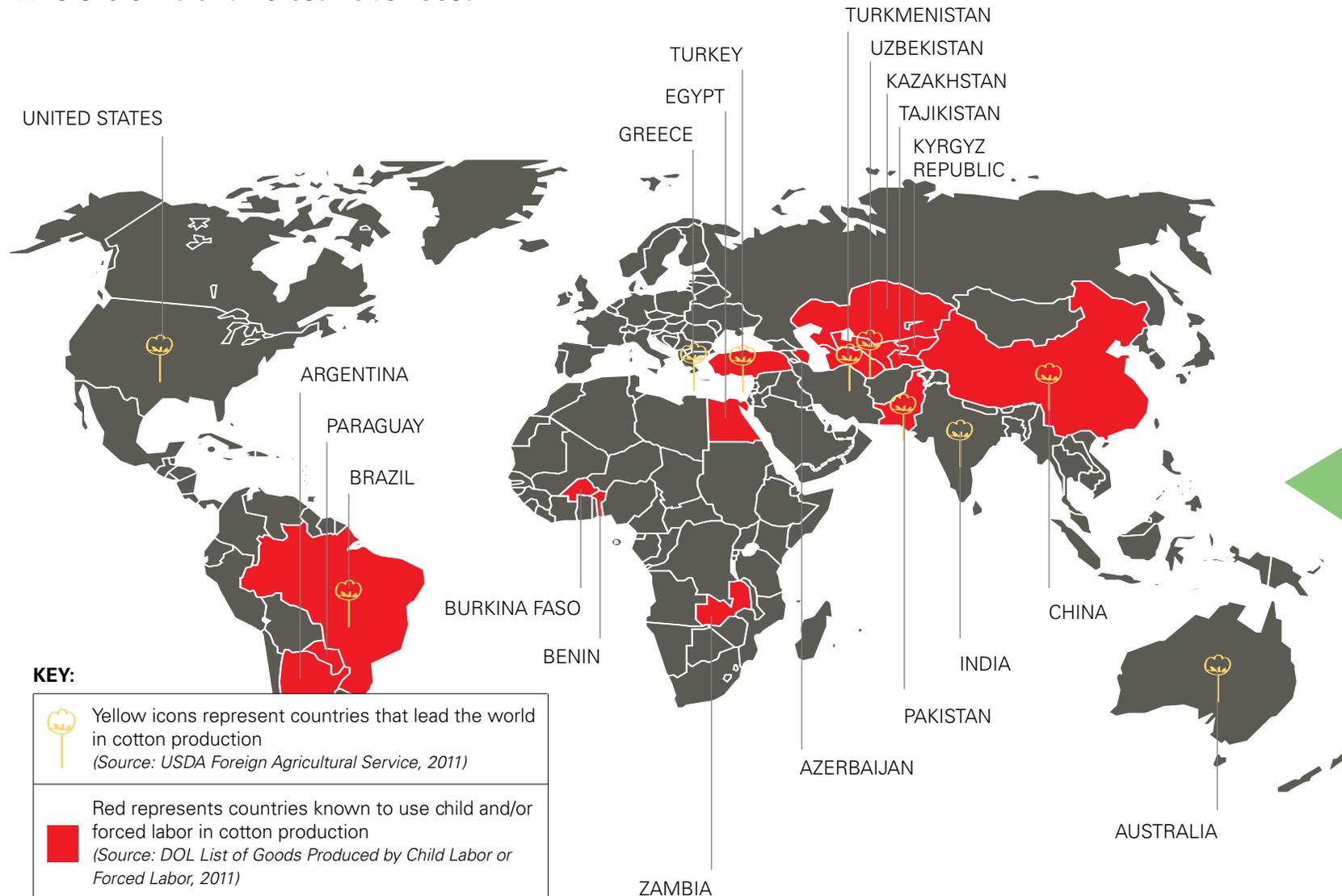
Children can be found working in the textile industries of Gujarat and greater Delhi. These children commonly work long hours in difficult, dangerous conditions. In Gujarat, ILRF and its partner Prayas helped free one 12 year-old boy held in captivity by a cotton gin in owner after having lost his arm in a ginning accident.

Sources: CCC, SOMO & ICN: *Captured by Cotton*, 2011
Anti-Slavery International: Research 2009-2010
PRAYAS: Research, 2012
ILRF: “Child Laborer Finally Freed From Captivity After Losing Arm in Cotton Ginning Accident,” *Labor is Not a Commodity Blog*, 2012
Verite: *Regional Report: Indian Workers in Domestic Textile Production*, 2010

Child & Forced Labor in Cotton Production

Much of the apparel we buy in the United States and around the world contains cotton made by people held in modern-day slavery. Sixteen countries are known to use child and/or forced labor in cotton production. Of these, Uzbekistan, Brazil, Pakistan and Turkey are all top-ten global producers.

Where is Child and Forced Labor Used?



SPOTLIGHT: UZBEKISTAN

Uzbekistan is currently the world's second-largest exporter of cotton globally, where state-sponsored forced and child labor continue on a massive scale. The Karimov government forces over a million individuals across the country—from adults to children as young as 10—to pick the crop each year. It requires teachers to close schools for the harvest, and forces children to work up to 70 hours a week for little or no wages under threat of expulsion. Farmers are required to meet production quotas and then forced to sell the crop to the administration at an artificially low price, keeping them in poverty. Citizens who speak out against these abuses are punished with detention, torture and exile. Meanwhile the Karimov government profits from ongoing cotton sales on the international market, and the material continues to find its way into globally-sold apparel.

Sources: Cotton Campaign: *End Forced Labor in the Cotton Sector of Uzbekistan, 2012*: <http://www.cottoncampaign.org/>
 U.S. Central Intelligence Agency: *The World Factbook: Uzbekistan, 2012*
 ILRF: *We Live Subject to their Orders, 2009*

State
of the
Industry:

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POLICIES

This chapter focuses on apparel companies' policies to address child and forced labor in their supply chains. It looks at how fifty companies perform in this category and highlights specific good practices.

Policies | State of the Industry: Overview

While good policies do not necessarily mean good practices, they are a critical starting point. They form the backbone of management systems that uphold worker rights and protect against abuses like the use of child and forced labor.

CODES OF CONDUCT

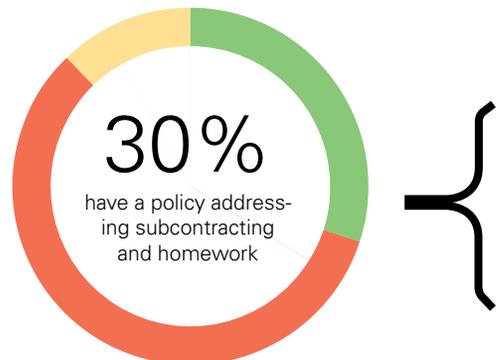
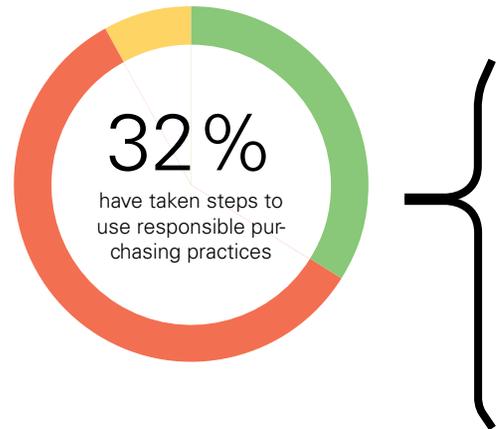
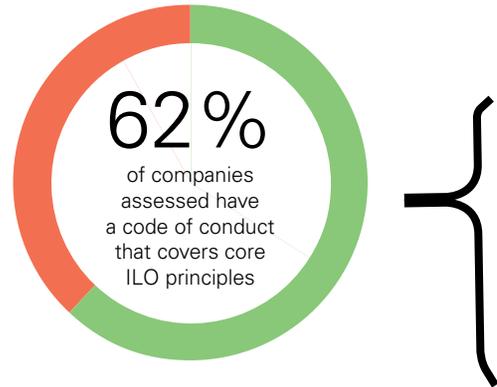
A Code of Conduct lays out minimum social requirements suppliers must follow. Good codes are based on internationally agreed upon standards. The International Labor Organization (ILO) Four Fundamental Principles and Rights at Work define clear principles for prohibitions against child labor, forced labor and discrimination, and guarantees for worker rights to freedom of association and collective bargaining. Among the apparel companies Free2Work assessed, 62% have Codes of Conduct that align at minimum with these basic principles.

RESPONSIBLE PURCHASING

The way a company purchases from its subcontracted factories and suppliers affects those businesses' ability to provide fair conditions to workers. The quick order turn-arounds of the fast-fashion world, for example, can lead a supplier to force workers to labor overtime. When companies squeeze suppliers by demanding low prices, this means suppliers have less money to spend on paying decent wages. Very few of the companies assessed guarantee a decent price to their suppliers or otherwise financially enable their suppliers to comply with code standards. Nevertheless, 32% of those assessed did report some steps towards improving purchasing practices, which indicates at least an admission of the need to address the problem.

SUBCONTRACTING POLICIES

It is common practice for suppliers to subcontract parts of companies' orders out to unauthorized, unmonitored facilities where workers are left without any redress in the event of abuse. Only 30% of companies assessed say they are taking steps to implement policies against unauthorized production; most commonly this entails monitoring suppliers' production volumes against capacities.



Policies | Good Practice Highlights

The following are more detailed snapshots of two companies' good practices in the policies category:

Freedom of Association Policy Good Practice: **INDITEX**

(Brands: Zara, Pull & Bear, Massimo Dutti, Bershka, Stradivarius, Oysho, Uterque)

The best foil against forced labor is ensuring workers' ability to organize and bargain collectively and thus claim their rights at work. In this regard, Inditex has signed a groundbreaking framework agreement with the International Textile Garment and Leather Workers Federation (ITGLWF); it is the only agreement of its sort in the world to cover a retail company supply chain. Through the accord, Inditex has committed to working with the ITGLWF to uphold workers' rights to freedom of association and collective bargaining, and recognizes these rights as the path to realization of its code standards. The agreement was strengthened in 2010 with a Protocol of Action, which commits Inditex to working with the global trade union federation on compliance monitoring, training and union intervention. Inditex has signed to working to ensure the provision of certain labor conditions including living wages to even distant suppliers—the agreement covers Inditex's involvement with direct suppliers, contractors, subcontractors and homeworkers alike.

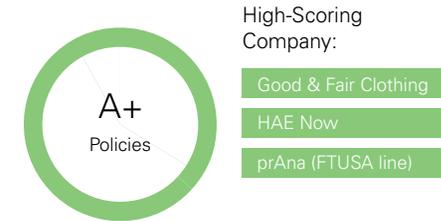
Responsible Purchasing Good Practice: **MAGGIE'S ORGANICS**

While a handful of brands admit the importance of responsibly purchasing from suppliers, Maggie's Organics is one of the few companies to concretely implement significant structural changes. Most apparel companies choose to outsource production because by doing so they transfer certain responsibilities, risks and costs to suppliers. Typically, brands' drive to find the cheapest production forces suppliers to keep costs low in order to stay afloat; this downward pressure on prices undercuts suppliers' ability to afford to provide decent wages and working conditions. In contrast, through fair purchasing practices a company can enable its suppliers to afford such provisions. This year Maggie's began pre-financing its organic cotton supplier's production, which means that Maggie's is choosing to carry the risk of crop failure together with its supplier. Maggie's – rather than the cotton farmer – now takes the burden of carrying enough extra inventory to buffer through shortages. Maggie's pays directly for this cotton, relieving its textiles supplier from fronting this expense. By locking cotton prices at the time of planting based on input costs, Maggie's creates financial stability for both suppliers. Because Maggie's assumes these financial burdens and risks, the company's textiles and cotton suppliers can afford to pay for decent working conditions.

Category Winners

Companies who scored the highest statistically in the Policies category:

Companies with Certifications:

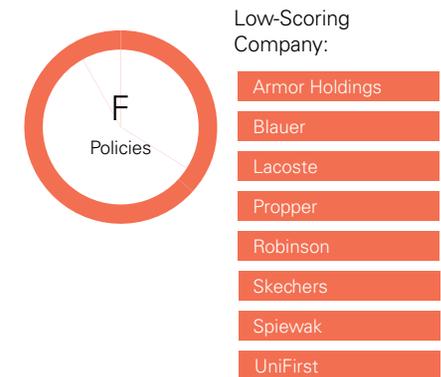


Companies without Certifications:



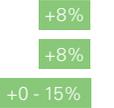
Category Losers

Companies who scored the lowest statistically in the Policies category:



Compare to Wage Impact:

Guarantees above local min. wage?



Guarantees above local min. wage?



Guarantees above local min. wage?



State
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Industry:

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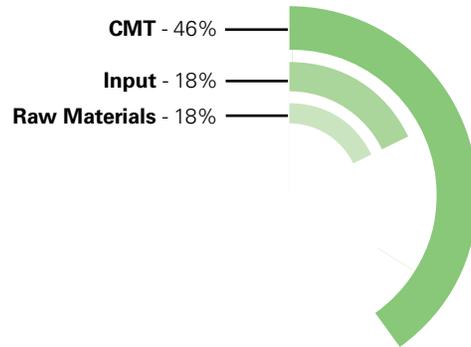
TRACEABILITY & TRANSPARENCY

This chapter focuses on apparel companies' supply chain traceability and transparency. It looks at how fifty companies perform in this category and highlights specific good practices.

Traceability & Transparency | State of the Industry: Overview

Surprisingly, many companies do not know exactly who produces their goods. Since child and forced labor are used in garment, textiles and cotton production globally, it is critical that a company knows the actors at each stage of its supply chain to guard against such abuses. Public transparency is important as well because it shows a company's willingness to being held externally accountable for its supply chain. We define traceability as the extent to which a company understands its supply chain, and transparency as the extent to which it makes information publicly available.

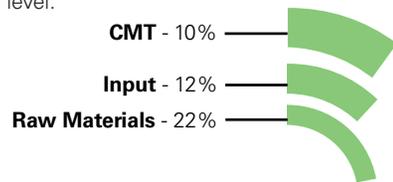
Percentage of companies that have fully traced their suppliers, at particular supply chain levels:



KNOWN SUPPLIERS

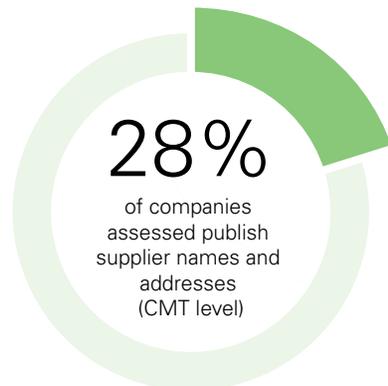
Free2Work believes that companies are responsible for the workers making products in every stage of production, and traceability is the first concrete step a company can take to realizing this responsibility. While most companies have some relationship with their direct cut-make-trim suppliers, they are often less clear about whether these suppliers are contracting production out to other factories. When it gets down to the cotton level, where the risks are significant, only 18% of companies we assessed — those with Fair Trade USA certified supply chains — know every supplier.

Out of companies that have not fully traced their suppliers, percentage involved in some form of tracing project, by supply chain level:



TRACING PROJECTS

Companies have outsourced production for decades. They have usually had little understanding of what takes place far upstream at the raw materials and inputs levels of their supply chains, depending instead on subcontractors and agents to source these components. As a result of the way these sourcing structures were created, it is now particularly challenging for large companies to retrace their supply chains. While more responsible companies have a good understanding of all stages of production, this graphic gives a breakdown of the percentage involved in a tracing project; these companies have not necessarily mapped their supply chains but are putting at least some resources toward beginning to do so.



PUBLIC SUPPLIER LISTS

Companies can show workers, consumers, and the public as a whole that they are committed to being held accountable to the workers in their supply chains by publishing supplier lists. Transparency enables independent groups to shed light on working conditions, which can in turn facilitate better public understanding of the issues and consumer demand for change. Of the companies Free2Work assessed, 20% publish a full cut-make-trim supplier list.

Traceability & Transparency | Good Practice Highlights

The following are more detailed snapshots of three companies' good practices in traceability and transparency. Traceability is the extent to which a company knows its supply chain; transparency is the extent to which it makes information publicly available.

Traceability Good Practice: **MAGGIE'S ORGANICS, HAE NOW, GOOD & FAIR CLOTHING**

Maggie's Organics deserves a spotlight for its traceability practices. The company works directly with all main actors in its supply chain: the cotton farm, the textiles ginner and spinner, the knitter, the cut-make-trim manufacturer, the dyer, and the screen printer.

The Fair Trade USA certification provides a best practice model in the category of traceability: the system requires tracing of the cut-make-trim, textiles, and levels of production. Of the supply chains Free2Work assessed, only those certified by Fair Trade USA were fully traced at the cotton level. Cotton traceability is particularly important because, as discussed earlier, risks of child and forced labor are high. Two other companies that use the label deserve particular recognition: HAE Now and Good & Fair Clothing. These two companies in particular are best practice leaders for exceeding the Fair Trade USA standard by sourcing all products from a monitored textile facility.

Fair Trade USA Context: While FTUSA companies compare well in some categories against mainstream standards, we note that in other areas the standard falls short of industry best-practice, and that many stakeholders find significant risk in a fair trade label that fails to meet this bar¹.

¹See ILRF Letter, "Comments for TransFair," 2009, for more details.

Transparency Good Practice: **PATAGONIA**

Patagonia, an outdoor clothing and equipment brand, discloses supply chain information visually through an online interactive site called Footprint Chronicles. While a handful of companies have made their full direct cut-make-trim supplier lists available, Patagonia models a way to make this information more accessible to the public. Footprint Chronicles visually links factory locations to their physical addresses and some factory demographics (languages spoken, number of employees, gender mix) for all cut-make-trim manufacturing sites and some textile mills. Site visitors can see photos and videos on suppliers that produce chiefly for Patagonia, and in some cases information about the environmental impact of the facility is also available.

Transparency Good Practice: **TIMBERLAND**

Timberland, an outdoor-wear and footwear company, has traced its leather shoes supply chain all the way through to the raw materials level, which is a rare achievement for a large apparel company. While the company is not as far along in its cotton traceability, it has a direct knowledge of, or relationship with, 100% of its leather suppliers. It has also traced all cut-make-trim manufacturers, major subcontractors, and textiles suppliers. Timberland publishes a list of the names and addresses of all of its direct cut-make-trim suppliers and a partial list of its other suppliers.

Category Winners

Companies who scored the highest statistically in the Transparency category:

Companies with Certifications:



Companies without Certifications:



Category Losers

Companies who scored the lowest statistically in the Transparency category:



Compare to Wage Impact:

Guarantees above local min. wage?

- +8%
- +8%
- +10 - 25%

Guarantees above local min. wage?

- NO
- NO

Guarantees above local min. wage?

- NO
- NO
- NO
- NO
- NO

State
of the
Industry:

5

MONITORING & TRAINING

This chapter focuses on apparel companies' monitoring and training programs, which can be important parts of preventative systems. It looks at how fifty companies perform in this category and highlights specific good practices.

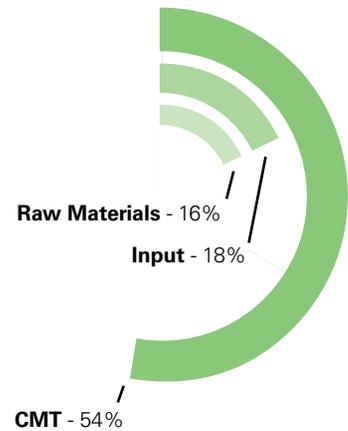
Monitoring & Training | State of the Industry: Overview

Audits are tools companies can use to get snapshots of supplier working conditions, and to identify major abuses such as the use of modern-day slavery. Workers themselves are the best monitors. Accurate information can often only be gathered by interviewing workers off-site and away from management, where workers feel comfortable to express concerns. The most replicable model— one that is under-utilized— is one where workers are organized into a functioning union with access to a safe and

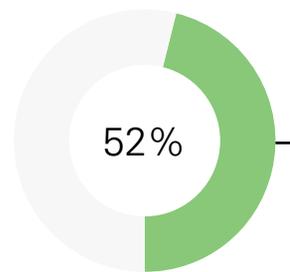
effective grievance process. While audits can be a key element of ensuring compliance, they are only effective when the information gathered is used to improve working conditions. Audits can form the basis of corrective action plans, which suppliers can use to correct issues. Many suppliers lack the capacity or knowledge to provide certain protections to workers, which is why training programs can be an important tool.

AUDITING SUPPLIERS

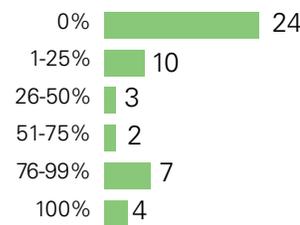
% of companies that monitor more than 50% of suppliers, by supply chain level



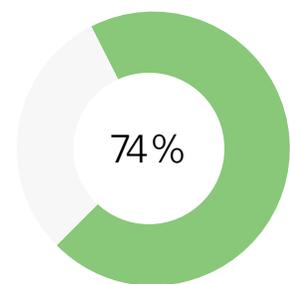
% of all companies assessed that use **internal audits** (CMT)



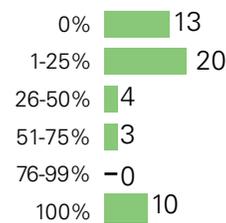
of companies that use internal monitoring, broken down by % of suppliers monitored with this system



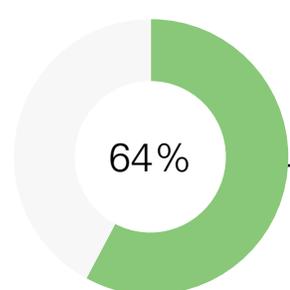
% of companies that use **third party monitoring** (CMT)



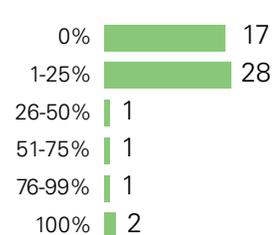
of companies that use third party monitoring, broken down by % of suppliers monitored with this system



% of companies that audit suppliers **unannounced or with off-site worker interviews** (CMT)



of companies that use unannounced visits or off-site interviews, broken down by % of suppliers monitored in this fashion



INTERNAL SYSTEMS

Among the companies Free2Work assessed, 46% use their own internally developed monitoring system to audit at least a portion of their supply chains. These systems vary in quality and are not necessarily better or worse than third party audits.

THIRD PARTY SYSTEMS

A full 70% of companies have elected to contract with a third party auditor to monitor at least a portion of their supply chains. Some of these also use some internal auditing, and some do not. Third party monitoring systems, like internal ones, differ significantly in quality.

QUALITY OF AUDIT

Unannounced audits provide a more accurate picture of day-to-day operations because abuses cannot be as easily hidden without advanced warning. Workers are best able to express concerns when interviewed off-site, away from management. Only 8% of companies assessed report using unannounced visits and/or offsite interviews for the majority of their audits.

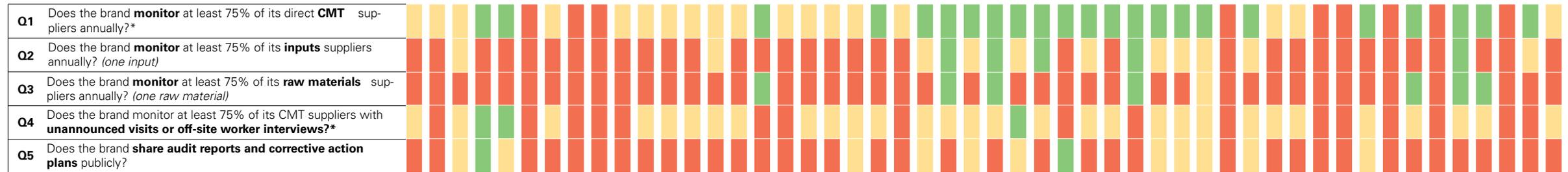
Monitoring & Training | Company Performance

See which companies performed the best and which companies have neglected monitoring or training their suppliers. Most companies own multiple brands; see index for full brand breakdown.



* = stat looks at Cut-Make-Trim (CMT) phase only

Monitoring



Training



State
of the
Industry:

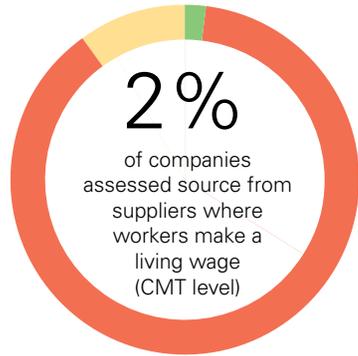
6

WORKER RIGHTS

This chapter focuses on the degree to which companies support worker rights. It looks at how fifty companies perform in this category and highlights specific good practices.

Worker Rights | State of the Industry: Overview

Most workers in apparel supply chains toil under poor conditions and are paid extremely low wages. Free2Work looks at whether companies are actively addressing worker well-being. Risks of modern-day slavery are far less in workplaces where individuals are able to claim their rights at work through organizing, and where workers do not suffer from poverty wages.



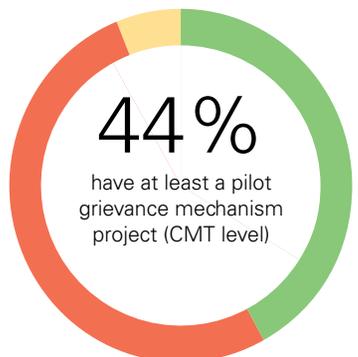
LIVING WAGE

A living wage is defined as one that provides enough money for a worker to pay for a family's basic needs including food, water, shelter, clothing, transportation, energy, education, health care, savings, and some discretionary spending. Only one company assessed—Alta Gracia—provides a living wage to workers at the cut-make-trim level, as will be discussed below. Zero companies evaluated source from textiles or cotton suppliers that provide a living wage.



PREFERRED SUPPLIER PROGRAMS

Companies have the financial leverage to demand and ensure decent working conditions, living wages and implementation of labor rights, in particular by concentrating their order volumes in a sufficiently narrow set of suppliers in order to command a significant portion of a supplier's product capacity. While most companies assessed do not make compliance with social standards a priority in picking suppliers, 34% report basing sourcing decisions to some degree on labor conditions.



GRIEVANCE MECHANISMS

Grievance mechanisms are systems through which workers can anonymously submit complaints of violations of their rights and seek relief. While many companies ask their suppliers to establish internal grievance mechanisms, it is important that workers are given an avenue through which they can communicate to an external party, since the supplier may be directly responsible for the abuse. Among the companies assessed, 46% have made some form of external grievance mechanism available to at least a portion of their supply chain.

Worker Rights | Company Performance

See which companies performed the best and which companies have neglected supporting the rights of their supply chain workers. Most companies own multiple brands; see index for full brand breakdown.



Worker Rights

* = stat looks at Cut-Make-Trim (CMT) phase only



Worker Rights Grade:

Index | Rating Scopes

Most ratings apply to multiple brands owned by the same company. See the scope of each rating below:

ABERCROMBIE & FITCH

Abercrombie & Fitch
Hollister
Gilly Hicks

AEROPOSTALE

Aéropostale
p.s. from aéropostale

ADIDAS

adidas
Ashworth
Reebok
Taylormade- adidas Golf

ALTA GRACIA

Alta Gracia

AMERICAN EAGLE

77 Kids
Aerie
American Eagle

ARAMARK

ARAMARK
Galls
WearGuard
Crest Uniform

ARC'TERYX

Arc'teryx

ARMOR HOLD-INGS

American Body
Armor
Bianchi Body Armor
ProTech Corrections
ProTech Tactical
Safariland Armor-wear
Savvy Armor
Second Chance
Armor
Total Armor Solution
911EP
Armor Accessories
Armored
Bianchi International
Defense Technology
Duty Gear
Forensics
Handcuffs
Hatch
Hiat
Monadnock
Projectina
Protect

BLAUER

B. Cool
Blauer
Class Act
Commando
Defender
GTX
Streetgear
Tacshell
Tech Wear
TNT
Undergear

BOB BARKER

Bob Barker
Comfort Zone
Liberty
MacGregor
Tristich

CARTER'S

Carter's
Child of Mine
Genuine Kids
Just One You
OshKosh B'Gosh

DISNEY

Disney

EILEEN FISHER

EILEEN FISHER

ELBECO

Checkpointe
ComfortGrip
DutyMax
Elbeco
Fit for Duty
Luxury
Luxury
Plus
Meridian
Paragon Plus
Prestige
Summit Duty
Tek
Tex-Top
Top Authority
Twill
UFX
West Coast

ESTEAM

Esteam Apparel

EXPRESS

Express

FECHHEIMER BROTHERS

Flying Cross
Urban Defender
Vertyx

FOREVER 21

21 Mens
Forever 21
Heritage 1981
Love 21 Con-temporary

FRUIT OF THE LOOM

Best
BVD
Fruit of the Loom
Fungals
Funpals
Lofteez
Screen Stars
Underoos

GAP

Athleta
Banana Re-public
Gap
Old Navy
Piperlime

GARAN

Garanimals

GILDAN

All Pro
Auro
Gildan
Gold Toe
GT
PowerSox
SilverToe

GOOD & FAIR

Good & Fair
Clothing

H&M

Cheap Monday
COS
H&M
Monki
Weekday

HAE NOW

HAE Now

HANESBRANDS

Aire
Bali
Barely There
Beefy-T
C9
Cacharel
Celebrity
Champion
Daisyfresh
Duo Fold
Hanes
Hanes Hosierey
J.E. Morgan
Just My Size
Leggs
One Hanes
Outer Banks
Playtex
Rinbros
Ritmo
Sheer Energy
Silk Reflections
Sol
Sol Y Oro
Stedman
Tagless
Wonderbra
Zorba

INDITEX

Bershka
Massimo Dutti
Oysho
Pull & Bear
Stradivarius
Tempe
Uterquē
ZARA
ZARA HOME

LACOSTE

Lacoste

LEVI STRAUSS

Denizen
Dockers

(Levi's cont.)

Levi's
Signature

LULULEMON

Lululemon

MAGGIE'S ORGANICS

Maggie's Organics

NEW BALANCE

Aravon
Brine
Dunham
New Balance
PF-Flyers
Warrior

PATAGONIA

Patagonia

PRANA

prAna

PROPPER

ACU
Battle Rip
BDU
Critical Edge
Genuine Gear
Propper
TAC

PUMA

Cobra Golf
Puma
Tretorn

PHILLIPS VAN HEUSEN

ARROW
Eagle
G.H. Bass
Calvin Klein
Heritage Brands
IZOD
Tommy Hilfiger
Van Heusen

QUIKSILVER

DC
GNU Skateboards
HAWK Skateboarding
LIB-TECH
MOSKOVA
QUIKSILVER
ROXY
VSTR

ROBINSON TEXTILES

Robinson Textiles

ROCKY BRANDS

Built by Georgia Boot
Durango
Georgia Boot
Giant by Georgia Boot
Lehigh
Rocky Outdoor Gear

RUSSELL

American Athletic
Bike
Brooks
Dudley
Jerzees/ Cross Creek
Russell Athletic
Spalding

SKECHERS USA

Mark Nason
Skechers
Unlimited by Marc
Ecko
Zoo York

SOLIDARITY CLOTHING

Solidarity Clothing

SPIEWAK

Avenel
Bio Protective Clothing
Career Fashion
Elber on Rain
Excalibur
Flight Deck USA
Greenbriar
Hidden Agenda

(Spiewak cont.)

Jones Duty
Ortley
Pelham
Rockaway
Saber
Shadmore
Spiewak
Titan
Vizguard
Weather-Tech

TIMBERLAND

Howie's
Smartwool
Timberland

TOMPKINS POINT APPAREL

Tompkins Point Apparel

UNIFIRST

Armorex
Breeze Weave
Comfort First
CXP
Nomex
Flexwear
Great Impressions
Indura
Softwil
Ultra Soft
Uniclean
Unifirst
Unimop
Uniscraper

VF

20X
7 For All Mankind
Aura
Belcor
Bolero
Brittania
Bulwark Protective Apparel
Byron Nelson
Chef Designs
Chic
E. Magrath
Eagle Creek

(V.F. cont.)

Eatpak
Ella Moss
Gema
Gemma
Hero
H-I-S
Horace Small
Intima Cherry
Jansport
John Varvatos
Kipling
Lee Jeans
Lee Sport
Lou Gitano
Lucy
Majestic
Maverick
Napapijiri
Nautica
Oldaxe
Red Kap
Riders by Lee
Riggs Workwear
Rustler
Splendid
The Force
The North Face
Timber Creek
Vans
Variance
Wrangler
Bestform
Curvation
Lily of France
Vassarette

WALMART

Faded Glory
George
Jesse James
No Boundaries
Simply Basic

Index | Rating Scopes

Most ratings apply to multiple brands owned by the same company. Search for a brand's rating:

Brand Name: Rating (Owner):

20X	VF
21 Mens	FOREVER 21
7 For All Mankind	VF
77 Kids	AMERICAN EAGLE
911EP	ARMOR HOLDINGS
Abercrombie & Fitch	ABERCROMBIE & FITCH
ACU	PROPPER
adidas	ADIDAS
Aerie	AMERICAN EAGLE
Aéropostale	AEROPOSTALE
Aire	HANESBRANDS
All Pro	GILDAN
Alta Gracia	ALTA GRACIA
American Athletic	RUSSELL
American Body Armor	ARMOR HOLDINGS
American Eagle	AMERICAN EAGLE
ARAMARK	ARAMARK
Aravon	NEW BALANCE
Armorex	UNIFIRST
Arc'teryx	ARC'TERYX
Armor Accessories	ARMOR HOLDINGS
Armored	ARMOR HOLDINGS
ARROW	PHILLIPS VAN HEUSEN
Ashworth	ADIDAS
Athleta	GAP
Aura	VF
Auro	GILDAN
Avenel	SPIEWAK
B. Cool	BLAUER
Bali	HANESBRANDS
Battle Rip	PROPPER
Banana Republic	GAP
Barely There	HANESBRANDS
BDU	PROPPER
Beefy-T	HANESBRANDS
Belcor	VF
Bershka	INDITEX
Best	FRUIT OF THE LOOM

Bestform	VF
Bianchi Body Armor	ARMOR HOLDINGS
Bianchi International	ARMOR HOLDINGS
Bike	RUSSELL
Bio Protective Clothing	SPIEWAK
Blauer	BLAUER
Bob Barker	BOB BARKER
Bolero	VF
Breeze Weave	UNIFIRST
Brine	NEW BALANCE
Brittania	VF
Brooks	RUSSELL
Built by Georgia Boot	ROCKY BRANDS
Bulwark Protective Apparel	VF
BVD	FRUIT OF THE LOOM
Byron Nelson	VF
C9	HANESBRANDS
Cacharel	HANESBRANDS
Calvin Klein	PHILLIPS VAN HEUSEN
Career Fashion	SPIEWAK
Carter's	CARTER'S
Celebrity	HANESBRANDS
Champion	HANESBRANDS
Checkpointe	ELBECO
Chef Designs	VF
Chic	VF
Child of Mine	CARTER'S
Cheap Monday	H&M
Class Act	BLAUER
Cobra Golf	PUMA
Comfort First	UNIFIRST
ComfortGrip	ELBECO
Comfort Zone	BOB BARKER
Commando	BLAUER
COS	H&M
Crest Uniform	ARAMARK
Critical Edge	PROPPER
Curvation	VF
CXP	UNIFIRST
Daisyfresh	HANESBRANDS
DC	QUIKSILVER
Defender	BLAUER
Defense Technology	ARMOR HOLDINGS
Denizen	LEVI STRAUSS
Disney	DISNEY
Dockers	LEVI STRAUSS

Dudley	RUSSELL
Dunham	NEW BALANCE
Duo Fold	HANESBRANDS
Durango	ROCKY BRANDS
Duty Gear	ARMOR HOLDINGS
DutyMax	ELBECO
E. Magrath	VF
Eagle	PHILLIPS VAN HEUSEN
Eagle Creek	VF
Eatpak	VF
EILEEN FISHER	EILEEN FISHER
Elbeco	ELBECO
Elber on Rain	SPIEWAK
Ella Moss	VF
Esteam Apparel	ESTEAM APPAREL
Excalibur	SPIEWAK
Express	EXPRESS
Faded Glory	WALMART
Fit for Duty	ELBECO
Flexwear	UNIFIRST
Flight Deck USA	SPIEWAK
Flying Cross	FECHHEIMER BROTHERS
Fruit of the Loom	FRUIT OF THE LOOM
Forensics	ARMOR HOLDINGS
Forever 21	FOREVER 21
Fungals	FRUIT OF THE LOOM
Funpals	FRUIT OF THE LOOM
G.H. Bass	PHILLIPS VAN HEUSEN
Galls	ARAMARK
Gap	GAP
Garanimals	GARAN
Genuine Gear	PROPPER
Genuine Kids	CARTER'S
Georgia Boot	ROCKY BRANDS
Gema	VF
Gemma	VF
George	WALMART
Giant by Georgia Boot	ROCKY BRANDS
Gildan	GILDAN
Gilly Hicks	ABERCROMBIE & FITCH
GNU Skateboards	QUIKSILVER
Gold Toe	GILDAN
Good & Fair Clothing	GOOD & FAIR CLOTHING
Great Impressions	UNIFIRST
Greenbriar	SPIEWAK
GT	GILDAN
GTX	BLAUER
H&M	H&M
HAE Now	HAE NOW
Handcuffs	ARMOR HOLDINGS

Hanes	HANESBRANDS
Hanes Hosiery	HANESBRANDS
Hatch	ARMOR HOLDINGS
HAWK Skateboarding Syst.	QUIKSILVER
Heritage 1981	FOREVER 21
Heritage Brands	PHILLIPS VAN HEUSEN
Hero by Wrangler	VF
H-I-S	VF
Hiat	ARMOR HOLDINGS
Hidden Agenda	SPIEWAK
Hollister	ABERCROMBIE & FITCH
Horace Small	VF
Howie's	TIMBERLAND
Indura	UNIFIRST
Intima Cherry	VF
IZOD	PHILLIPS VAN HEUSEN
J.E. Morgan	HANESBRANDS
Jansport	VF
Jerzees/ Cross Creek	RUSSELL
Jesse James Industrial	WALMART
John Varvatos	VF
Jones Duty	SPIEWAK
Just My Size	HANESBRANDS
Just One You	CARTER'S
Kipling	VF
Lacoste	LACOSTE
Lee Jeans	VF
Lee Sport	VF
Leggs	HANESBRANDS
Lehigh	ROCKY BRANDS
Levi's	LEVI STRAUSS
Liberty	BOB BARKER
LIB-TECH	QUIKSILVER
Lily of France	VF
Loftteez	FRUIT OF THE LOOM
Lou Gitano	VF
Love 21 Contemporary	FOREVER 21
Lucy	VF
Lululemon	LULULEMON
Luxury	ELBECO
Luxury Plus	ELBECO
MacGregor	BOB BARKER
Majestic	VF
Maggie's Organics	MAGGIE'S ORGANICS
Mark Nason	SKECHERS USA
Massimo Dutti	INDITEX
Maverick	VF
Meridian	ELBECO
Monadnock	ARMOR HOLDINGS
Monki	H&M

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MOSKOVA
 Napapijiri
 Nautica
 New Balance
 No Boundaries
 Nomex
 Old Navy
 Oldaxe
 One Hanes
 Ortle
 OshKosh B'Gosh
 Outer Banks
 Oysho
 Paragon Plus
 Patagonia
 Pelham
 PF-Flyers
 Piperlime
 Playtex
 PowerSox
 prAna
 Prestige
 Projectina
 Propper
 ProTech Corrections
 ProTech Tactical
 Protect
 p.s. from aéropostale
 Pull & Bear
 Puma
 QUIKSILVER
 Red Kap
 Reebok
 Riders by Lee
 Riggs Workwear by Wrangler
 Rinbros
 Ritmo
 Robinson Textiles
 TILES
 Rockaway
 Rocky Outdoor Gear
 ROXY
 Russell Athletic
 Rustler
 Saber
 Safariland Armorwear

QUIKSILVER
 VF
 VF
 NEW BALANCE
 WALMART
 UNIFIRST
 GAP
 VF
 HANESBRANDS
 SPIEWAK
 CARTER'S
 HANESBRANDS
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 ELBECO
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 ARMOR HOLDINGS
 PROPPER
 ARMOR HOLDINGS
 ARMOR HOLDINGS
 ARMOR HOLDINGS
 AEROPOSTALE
 INDITEX
 PUMA
 QUIKSILVER
 VF
 ADIDAS
 VF
 VF
 HANESBRANDS
 HANESBRANDS
 ROBINSONTEX-
 SPIEWAK
 ROCKY BRANDS
 QUIKSILVER
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 ARMOR HOLDINGS

Savvy Armor
 Screen Stars
 Second Chance Armor
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 Summit Duty
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 Timber Creek by Wrangler
 Timberland
 Titan
 TNT
 Tommy Hilfiger
 Tompkins Point Apparel
 Top Authority
 Total Armor Solution
 Tretorn
 Tristich
 Twill
 UFX
 Ultra Soft
 Undergear

ARMOR HOLDINGS
 FRUIT OF THE LOOM
 ARMOR HOLDINGS
 SPIEWAK
 HANESBRANDS
 LEVI STRAUSS
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 GILDAN
 WALMART
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 PHILLIPS VAN HEUSEN
 TOMPKINS POINT APPAREL
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 UNIFIRST
 BLAUER

Underoos
 Uniclean
 Unifirst
 Unimop
 Unlimited by Marc Ecko
 Uniscraper
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 Vizguard
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 WearGuard
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 Weekday
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 Warrior
 Wonderbra
 Wrangler
 ZARA
 ZARA HOME
 Zoo York
 Zorba

FRUIT OF THE LOOM
 UNIFIRST
 UNIFIRST
 UNIFIRST
 SKECHERS USA
 UNIFIRST
 FECHHEIMER BROTHERS
 INDITEX
 PHILLIPS VAN HEUSEN
 VF
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 INDITEX
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Index | Active Campaigns Exposing Labor Violations

Free2Work grades do not necessarily give a full picture of a company's efforts to treat workers in its supply chain justly. To balance this, the following is a list of links to active campaigns against companies for various labor rights violations:

ABERCROMBIE & FITCH: http://action.laborrights.org/p/dia/action/public/?action_KEY=4007

ADIDAS: http://action.laborrights.org/p/dia/action/public/?action_KEY=4391
<http://usas.org/2012/09/14/the-first-domino-falls-cornell-university-cuts-ties-with-adidas-over-sweatshop-abuses/>

CARTER'S: http://action.laborrights.org/p/dia/action/public/?action_KEY=4007

GAP: http://action.laborrights.org/p/dia/action/public/?action_KEY=4007

H&M: http://action.laborrights.org/p/dia/action/public/?action_KEY=4007

WALMART: http://action.laborrights.org/p/dia/action/public/?action_KEY=2033