



FASHION TRANSPARENCY INDEX

2019 EDITION

A review of 200 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

Beauty is truth, truth beauty.

John Keats declared that real beauty resides in truth and truth alone is beautiful. The beauty of objects may change, so we should pay more attention to the beauty at their core than to outward appearances. Our perception of what we consider to be a beautiful or desirable item of clothing can change not just with trends, time or the impact of use, but by knowing the truth behind its manufacture. How was it made and by whom? Knowing the truth can change our perception.

More than ever before, brands and retailers are being held to account and beginning to realise that their fashion statements need to be embodied in truth. We don't want beautifully written empty words of vision and commitment; we want real, tangible information.

Leading up to International Women's Day this year, many people asked brands where their women's empowerment slogan T-shirts were made. Did they empower the women who made them? Just 37.5% of the 200 brands reviewed this year, down from 40% of 150 brands reviewed last year, disclose that they are involved in capacity building projects in the supply chain focused on gender equality or female empowerment, and only 3 brands are publishing data on the prevalence of gender-based labour violations in supplier facilities.

We are also starting to see the truth of our destruction of the natural world and recognising the significant role played by the fashion industry. It is one of the most polluting industries in the world: global textile production emits 1.2 billion tonnes of greenhouse gases annually, more than international flights and maritime shipping combined, and our clothing consumption is expected to

"There is no beauty without truth and there is no truth without transparency."

double by 2030. Although 72% of brands publish policies on energy and carbon emissions at the company level, and 48.5% publish supplier policies on this issue, just 55% of brands publish the annual carbon footprint in their own facilities and only 19.5% publish this information for their supply chain.

We recognise that it is not easy for brands to become transparent – it's an uncomfortable process, but a necessary one if we are to see change. Despite some progress over the past six years, the fashion industry still operates in an opaque manner and the lack of information about where our clothes and accessories are made and who made them is a huge barrier to change. Human rights abuses, gender inequality and environmental degradation remain rife and we know that exploitation thrives in hidden places. This is why Fashion Revolution urges all brands and retailers to pursue full supply chain transparency

and why we track their progress through our annual Fashion Transparency Index.

There truly is an ocean of truth lying undiscovered before us when it comes to the world of fashion, but there is a sea change taking place and we are seeing consumers wading in and asking, demanding, to know the truth behind their clothes. We have more and more online transparency tools at our disposal to hold brands and retailers to account. Even if they aren't disclosing this information themselves, sooner or later, the truth will come out.

The fashion of the future is not about the pretty little things, the shoes and handbag and new party dress. It is about weaving truth and values into our clothing. We love fashion. We love beautiful clothes. But there is no beauty without truth and there is no truth without transparency.

FINDINGS-AT-A-GLANCE

↑ 5 HIGHEST SCORING BRANDS

Adidas	64%
Reebok	64%
Patagonia	64%
Esprit	62%
H&M	61%

*out of 250 possible points

9% increase in average score amongst 98 brands reviewed since 2017

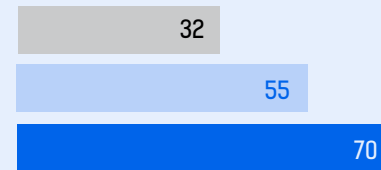
↑↓ 5 BIGGEST MOVERS (% CHANGE SINCE 2018)

Dior	↑ 22%
Sainsbury's Tu Clothing	↑ 21%
Nike Converse, Jordan and Nike	↑ 21%
New Balance	↑ 18%
Marc Jacobs	↑ 17%

Number of brands publishing suppliers lists

■ 2017 ■ 2018 ■ 2019

First-tier manufacturers



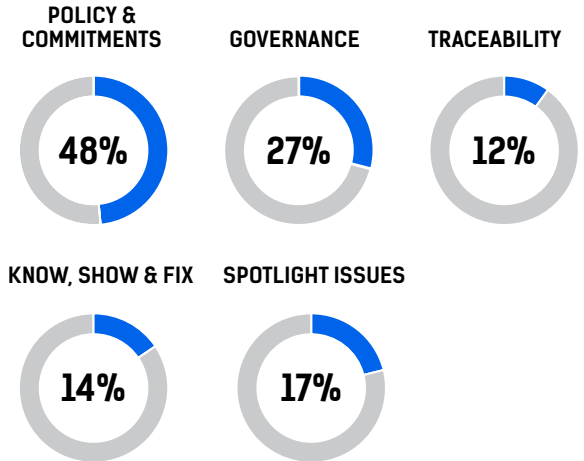
Processing facilities



Suppliers of raw materials



Average score in each section



↓ 5 BRANDS SCORING ZERO POINTS

Youngor	0
Jessica Simpson	0
Mexx	0
Elie Tahari	0
Tom Ford	0

4% increase in average score amongst 150 brands reviewed since 2018

EXECUTIVE SUMMARY

Sportswear and outdoor brands lead the way on transparency

This year's Fashion Transparency Index includes 200 of the world's biggest fashion brands and retailers. The highest scoring brands this year are Adidas, Reebok and Patagonia, who each score 64% of the 250 possible points. Esprit scoring 62% and H&M scoring 61% are the following two brands in the 61-70% range.

These brands are disclosing a wide range of human rights and environmental policies and commitments as well as information about how responsibility is governed throughout the business, who their suppliers are and some data about the outcomes and impacts of their sustainability practices.

While major brands are making significant steps towards supply chain transparency, detailed information about the outcomes and impacts of their efforts is still lacking. We see very little information and data disclosed about the purchasing practices of these leading brands and retailers, begging the question: what are brands doing to

be responsible business partners to their suppliers? And considering women form the majority of the people working in the fashion industry from factory to shop floor, we are surprised to see brands saying very little about their efforts to empower women and girls and achieve gender equality

Leading fashion brands and retailers are making significant efforts to be more transparent but there is still a long way to go

This is the first year that any brands and retailers will score over 60%, showing that leading brands are taking steps to disclose more about their social and environmental policies, practices and impacts.

The average score amongst the 200 biggest fashion brands and retailers reviewed this year is 21%. Whilst we are seeing some leading brands begin to disclose more information about their social and environmental policies, practices and impacts, there are still far too many major brands lagging behind.

No major brands score above 70%. Although our research this year shows a

marked improvement from 2017 when no brands scored more than 50%. This clearly indicates that even leading brands and retailers still have significant room for improvement when it comes to sharing their social and environmental policies, practices and impacts with their customers and stakeholders.

The Fashion Transparency Index has been a useful tool for encouraging greater transparency

Due to the increase in the number of brands reviewed this year, the overall average score has not increased, but amongst the 150 brands reviewed in 2018 and again in 2019 there has been a 3.6% increase in the average score.

Amongst the 98 brands reviewed in 2017, 2018 and again in 2019 there has been an 8.9% increase in the average score since they were first reviewed. This progress, coupled with the feedback we have received directly from brands, suggests that inclusion in the Fashion Transparency Index has motivated leading brands to be more transparent.

11 brands have increased their scores

by over 10% since last year, showing significant efforts to be more transparent, whilst 20 brands (or 10% of the brands reviewed) score above 50% compared to 10 brands in 2018.

14.5% of brands score less than 5%, compared to 17% of brands last year, which shows that more brands are embarking on their journey towards greater transparency.

We have found that the UK Modern Slavery Act, California Transparency in Supply Chains Act and some of the relevant French and EU legislation has forced major brands to disclose at least some information publicly.

Several fashion brands disclose supply chain information for the first time

Chanel, s.Oliver, Dior, Desigual and Sandro are publishing meaningful social and environmental information for the first time. Chanel increased from 3% in 2018 to 10% this year. Desigual increased 7%, Sandro and s.Oliver by 9% and Dior by almost 22% (nb. this may be a result of Dior being taken over by LVMH).

EXECUTIVE SUMMARY

5 major fashion brands disclose nothing at all

Only 5 brands (2.5%) of the brands reviewed) are scoring zero points this year compared to 9 brands (6%) last year. These are Eli Tahari, Jessica Simpson, Mexx, Tom Ford and Chinese menswear brand, Youngor. Another 10 brands are disclosing almost nothing (less than 2%), including Longchamp, Max Mara, New Yorker and several others.

Please note we are not evaluating brands' ethical or sustainability performance but rather how much information they disclose publicly about their human rights and environmental policies, practices and impacts.

More information shared about fashion brands' policies than their practices and impacts

As we have seen in previous years, brands continue to publish the most information about their policies and commitments, with an average score of 48% in that section of the methodology, while they disclose significantly less information about the outcomes and impacts of their social and

environmental practices. For example, the average score amongst all 200 brands in the Know, Show & Fix section is just 14% and in the Spotlight Issues section, where we do deep-dive research into some of the most pressing issues, brands score an average of 17%.

Major fashion brands have made significant progress on publishing supplier lists

70 out of the 200 major fashion brands are publishing a list of their first-tier manufacturers, and 38 brands are disclosing their processing facilities, where ginning and spinning, wet processing, embroidering, printing, finishing, dyeing and laundering typically takes place.

We have seen an increase in average scores in the Traceability section by over 7% amongst the fashion brands reviewed since 2017.

10 brands (5%) are disclosing some of the facilities or farms supplying their fibres such as viscose, cotton and wool. This is a significant increase from 2018 where only one brand disclosed this information and no brands shared this information in 2016 or 2017.

Many leading fashion brands share some information about their strategies for addressing environment impacts

The global apparel and footwear industry accounts for 8% of the world's greenhouse gas emissions, almost as much as the total for the whole of Europe. In a business-as-usual scenario, fashion's climate impact is expected to increase 49% by 2030 – equal to today's total annual greenhouse gas emissions in the United States, according to Quantis. Considering the need to act urgently on climate change and looking at what the major brands are disclosing about their efforts to reduce environmental impacts, we wonder if they are doing enough?

55% out of the 200 brands are publishing the annual carbon footprint in the company's own sites, although only 19.5% disclose carbon emissions in the supply chain – where over 50% of the industry's emissions occur, according to Quantis.

Meanwhile, whilst 43% of brands are publishing a sustainable materials strategy or roadmap, only 29% are

disclosing the percentage of their products that are made from sustainable materials.

54% of brands are publishing goals on improving environmental impacts, but only 40% publish goals on improving human rights.

Furthermore, for all the media scrutiny surrounding leading brands burning unsold stock over the past year, we were surprised to see that only 26.5% of brands describe what they are doing to reduce pre-consumer surplus/waste (e.g. off-cuts, unsold and defective stock, production samples, 23.5% of brands offer their customers in-store or online recycling schemes, and just 26% explain how they're investing in circular solutions to reduce textile waste.

Considering the fashion industry employs millions of women, brands ought to share far more information about how they are addressing gender equality

Women form the majority of the people working in the fashion industry from factory to shop floor. Around 70–80% of

EXECUTIVE SUMMARY

the world's millions of garment workers are female, yet major brands don't seem to be doing all that much to address gender inequality and empower women across the fashion value chain.

Just over one third of brands support women's empowerment projects for garment workers. However, only 3 brands (1.5%) publish data on the prevalence of gender-based violations in the supplier facilities.

63% of brands publish policies on equal pay but only 33.5% publish the annual gender pay gap within the company.

Major brands are disclosing shockingly little information about their purchasing practices

Only 6 (3%) of the 200 brands disclose a method for isolating and calculating labour costs in their price negotiation process with suppliers. 13 (6.5%) brands disclose a policy to pay suppliers within a maximum of 60 days. Only 4 brands publish the percentage of supplier payments made on time and according to agreed

terms – an issue we repeatedly have been told is a pain point for suppliers, one that can impact their ability to provide regular and fairly paid employment to workers. 18 (9%) brands disclose a formal process for gathering supplier feedback on the company's purchasing practices.

Given that major brands are expecting trust and transparency from suppliers, they too should share more information publicly about their own commitments and efforts to be responsible business partners.

How we plan to take action on these findings

The Fashion Transparency Index has been a useful tool for opening up conversations with the world's largest fashion brands and retailers about what they can do to be more transparent. We believe this is the first step in holding these big brands to account for the human rights and environmental impacts of their business practices.

In many ways, the world's major fashion brands have played a huge part

in accelerating climate change, and certainly they are responsible for many of the human rights abuses that persist in global supply chains.

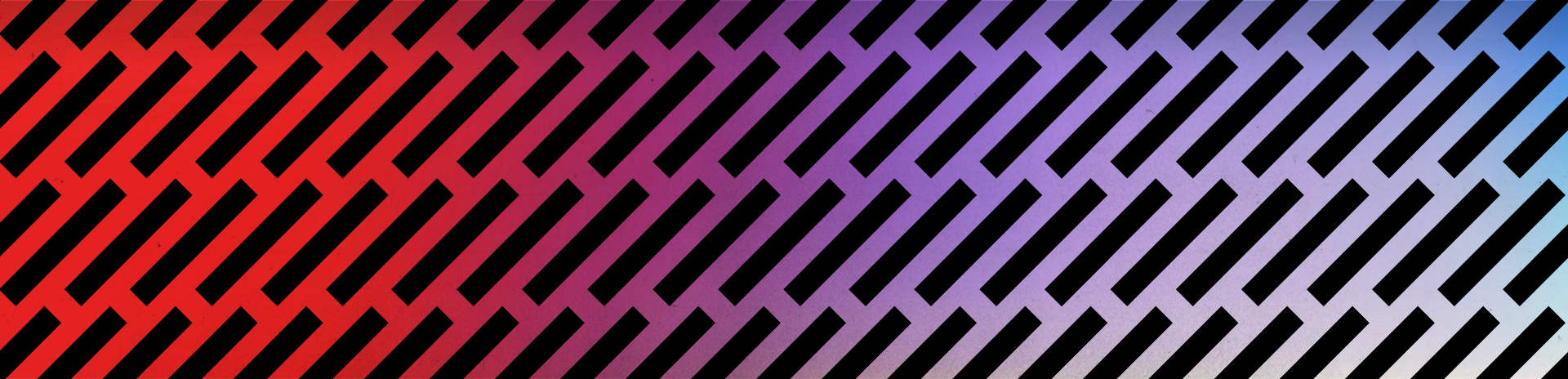
Major fashion brands have the moral imperative and ability to effect change on a global scale for large numbers of people and that puts them in a really powerful position. Having said that we're not going to be able to maintain current levels of production and consumption even if systems are designed to be much more restorative. Simply put, fashion brands will need to innovate as well as use fewer resources, and help their customers to consume less, take better care of their clothes and use them longer. The current model isn't working for the environment, nor for the vast number of people working for poverty-level wages in the supply chain. This can change and leading fashion brands have an important role to play.

We will continue to use the Index to measure brands' progress towards transparency and help push them harder and faster towards taking on more responsibility for their policies, practices and impacts.

By the 2020 edition of this Index, we hope to see even more major brands and retailers disclosing their suppliers. We want to see brands publishing more detailed information about the outcomes of their efforts to improve human rights and environmental sustainability. And finally, we will be encouraging major brands to share far more information about their purchasing practices, their actions to reduce waste and their efforts to achieve gender equality for women across the industry.

1

WHY TRANSPARENCY?



WHY TRANSPARENCY MATTERS IN THE FASHION INDUSTRY

Lack of transparency costs lives

When Rana Plaza collapsed six years ago in Bangladesh, killing and injuring thousands of garment workers, people had to dig through the rubble looking for clothing labels in order to figure out which brands were producing clothes in one of the five garment factories operating in the building.

In some cases, it took weeks for brands and retailers to determine why their labels were found amongst the ruins and what sort of purchasing agreements they had with those suppliers. Many clothing brands sourcing from the factories inside Rana Plaza didn't know their products were being made there.

Unfortunately, factory fires and accidents, poor working conditions, dangerous pollution and exploitation of garment workers remains rampant six years after Rana Plaza.

Fragmented supply chains obscure accountability

The vast majority of today's fashion brands and retailers do not own their manufacturing and supplier facilities, making it challenging to monitor or control working conditions and environmental impacts across the highly globalised supply chain. This can sometimes be used as an excuse for brands to evade responsibility for how their products are made.

Brands and retailers may work with hundreds or even thousands of factories at any given time – and that is just the suppliers that cut, sew and assemble our garments. There are many facilities further down the chain that weave, dye and finish materials and farms that grow fibres used in our clothing.

During the manufacturing process our clothes pass through many pairs of hands before they ever reach the shop floor or, increasingly, the screens of our phones and computers.



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

[Bottom]
'Bangladeshi
garment workers
block a road dur-
ing a demonstra-
tion to demand
higher wages in
Dhaka
by RTE
via <https://www.rte.ie/news/world/2019/0109/1022163-clothing-workers-strike-in-bangladesh/>



A brand might place an order with one supplier, who in turn subcontracts the work to another facility if they need to meet a short deadline or require a special process to be done. This happens regularly across the industry and makes it extremely difficult to monitor human rights and environmental impacts. Unauthorised subcontracting causes workers to become effectively invisible in the supply chain, and this is where the highest risk of human rights violations and environmental degradation tends to occur. But these subcontracted facilities are not the only places where poor conditions persist – sometimes it’s right under our noses in factories and communities close to home too.

Transparency as the first step towards change

Right after the Rana Plaza factory collapse happened, it became very clear to us that the fashion industry needed urgent, transformative change, and that the first vital step towards this change required far greater visibility and transparency of the people working in supply chains, the business relationships at play across supply chains and information about working conditions and environmental impacts.

Progress is happening but it is still difficult to know #whomademyclothes

Of course, much has changed since Rana Plaza, especially in Bangladesh. Many factories have been upgraded, and with all the attention on Bangladesh since then, some very real and positive progress has been made towards improving working conditions.

However, not enough has changed in global fashion supply chains and business practices on the whole across the industry are still very secretive. It is extremely challenging, if not almost impossible, for a consumer to find out where their clothes have been made, by whom and under what conditions – which means it is hugely difficult to know what real-world impacts, both positive and negative, our clothing purchases are having on people’s lives and on the environment.

This is why we are still calling for a revolution of the fashion industry. Never again should a tragedy like Rana Plaza happen, yet factory fires, safety accidents and faulty buildings continue to harm people in the places where our clothes are made. The women who make our clothes continue to face



"In our survey of over 5,000 consumers across Europe, 80% said that fashion brands should disclose their manufacturers."

FASHION REVOLUTION & IPSOS MORI
NOVEMBER 2018

regular and systemic discrimination and sexual abuse. Pollution and waste created as a result of the way our clothes are produced and consumed continues to damage our ecosystems.

People want to know #whomademyclothes

Consumers don't want to buy clothes made by people working in danger, exploited, paid poverty-level wages, in polluted environments but there is simply not enough information available about the clothes we wear. Fashion Revolution wants to change that. This is why we are pushing for more transparency from the fashion industry, and the annual [Fashion Transparency Index](#) is one of the tools that helps us do this.

When we are equipped with more – and better quality, credible – information about the human and environmental impacts of the clothes we buy, we are able to make more informed shopping choices. As a result, transparency builds trust in the brands we buy.

People are increasingly asking for greater transparency from the fashion industry. In 2018, more than 3.25 million people across the world participated in Fashion Revolution through events, posting on social media, viewing our videos or downloading resources from our website.

Over 173,000 posts using our hashtags, including #whomademyclothes, generating 720 million impressions during April 2018 alone – an increase of 35% on the previous year.

Transparency helps facilitate remediation of human rights and environmental abuses

As Jenny Holdcroft, the Assistant General Secretary of [IndustriALL Global Union](#), explained in previous editions, "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 recognise 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 their issues."

Greater transparency can help brands engage and collaborate with trade unions and civil society groups to identify and remedy problems more quickly, if the relevant information is available and easy to find. Transparency also helps others discover best practice examples and positive stories from the supply chain that can be highlighted, shared and potentially replicated elsewhere.

CASE STUDIES:

TRANSPARENCY IN ACTION



Real-life example of how transparency helps workers

MYANMAR

In Myanmar, six workers were terminated after forming a trade union. Using clothing labels from inside the factory, IndustriALL trade union members were able to check the online supplier lists disclosed by brands for whose labels they had found. This enabled the union members to reach out and build a coalition of brands, increasing their leverage within this large multinational supplier, to ensure that the workers' rights were upheld.

Because they had access to these supplier lists, the trade union was able to reach a negotiated settlement with the supplier to bring back the union leaders and move towards recognition of the union at the factory level.



Real-life example of when the lack of transparency is a problem for workers

TURKEY

In Turkey, there has been a recent case in which trade union leaders were illegally terminated for exercising their rights of freedom of association. In this case, workers reported which brands they were making clothes for, but this time none of the brands were publicly disclosing their supplier list, making it very difficult to hold them accountable. The Turkish union and IndustriALL attempted to contact

[LEFT] PHOTOGRAPHY: INDUSTRIALL - MYANMAR - workers in solidarity in front of the factory

[RIGHT] PHOTOGRAPHY @ INDUSTRIALL - Garment workers in Turkey

these brands but only received a response from one brand – stating that they are members of the Business Social Compliance Initiative (BSCI, now re-branded to amfori) and that their audit reports did not reveal any labour rights violation in the factory. In such cases, the workers can only use the national court system for potential remedy to their situation. This can take up to two years. The unions continue to follow up through the auditor, but it is an added layer that slows down the possibility of finding an adequate and timely resolution.

" Transparency is needed by every major multinational fashion brand and retailer in order to help workers understand what the brands whose clothes they are making are doing to uphold workers' rights. To me, transparency also means that brands are willing to be held accountable for their business practices.

My organisation uses the information disclosed by major fashion brands in various ways. For example, we share information with workers so they can negotiate for better working conditions and get their peers and managers involved too. We also use transparency information to understand good practices that brands are doing.

We would like to see more brands and retailers share information that is helpful to trade unions and garment workers such as supplier lists, audit reports and activities designed to advance freedom of association and social dialogue."

NAZMA AKTER
BANGLADESI TRADE UNIONIST AND
FOUNDER OF THE AWAJ FOUNDATION



VIEWPOINT:

GARMENT WORKERS LIKE ME DESERVE MORE TRANSPARENCY FROM BRANDS AND RETAILERS



JENNY DEWI
GARMENT WORKER CENTER

I have been a garment worker since 1999, and a member of the Garment Worker Center for six years. I joined the GWC because their mission is to organize Los Angeles workers to change the local industry for the better, and emphasize the importance of fashion brand accountability. Transparency is at the heart of brand accountability, and would be helpful for garment workers in Los Angeles and across the globe. We also need more local, national, and international policies that ensure such transparency is enforced in order to stop sweatshop labor.

There is a long history of non-transparency in the garment factories in Los Angeles. When employers hire workers, they want to know about our experience and skills, but we rarely get to ask them the same kind of questions. Upon hiring, workers often do not know if we are going to be paid a minimum wage, or how long we will get to work in the factory. There is also no fixed schedule. If the boss says they want the production done today, we have to finish it.

We are expected to work like machines, just carry out the operations without asking any questions. The garment companies don't let us know which brand, or retailers we are working for. Often we don't even know the name of the boss, or the name of the company. Even when workers file cases at the Labor Commission, we must do our own investigations in order to get this information.

For instance, when manufacturers that produced for Ross received the judgment of wage theft, they closed down their factories, and now we can't even find them. This is worsened

when the law is on the employer's side. Currently the California Garment Bill AB633 doesn't hold the brands accountable for wage theft. This is why we must take action and go directly after brands like Ross to demand justice.

A lot of our information has to come from workers on the factory floor. Workers learn to identify brands and labels, or pay attention to finishing boxes to understand where the merchandise is going. Sometimes it is through personal conversations where we learn how often the product comes to the factory, how much the manufacturers are paying per piece. Our pay is often in cash or cashier's check with no receipt, so we must document the pay ourselves.

Brands and retailers should disclose the wages workers are paid to produce clothing. Currently, the way things are structured, brands and retailers do not have to know or care about the workers who make their clothes.

Brands should demand information from the factory floor, and provide a line of communication between

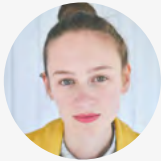
workers and their company, such as a complaint hotline. The brands should send independent monitors to check the conditions of the factories. Then they should reward the manufacturers who are treating their workers well to incentivize continued compliance.

The most difficult information to obtain is about how low the wages really are, hiring and pay rate discrimination, and health and safety conditions in the factories. The truth is that the "piece rate" in the garment industry has barely changed in more than two decades, so most of us make less than the minimum wage.

I want Fashion Revolution to expose the problems prevalent in the fashion industry so that customers, the public, and the government will demand real changes from retailers and brands. Over 45,000 garment workers in Los Angeles are working in a sweatshop industry. Every sector of the industry needs to take part in ending the exploitation, and making the working conditions better for garment workers in Los Angeles and across the globe.

VIEWPOINT:

CONSUMERS LIKE ME WANT BRANDS TO BE OPEN AND HONEST



TOLLY DOLLY POSH
ETHICAL FASHION BLOGGER
TOLLYDOLLYPOSHFASHION.COM

Transparency to me means having complete faith and trust in how a business works.

It's about a company facing issues head-on and creating open and honest dialogue around their practices, whether they are in the early stages of creating a more ethical and sustainable supply chain, or whether they've almost hit the nail on the head.

For me, when a brand flies the 'ethical fashion flag' proudly, it gives me a lot of confidence as a consumer to spend my money with them and put forward a vote for the sort of fashion industry I'd like to see. I find official credentials and certifications extremely valuable as they show a clear commitment to different efforts, and this goes across

the board from the fabrics to the factories being used.

A brand being honest about where they could be doing better or what they are trying improve brings me more comfort than a brand that decides to stay quiet or only answer questions when they're asked. Information should be clearly accessible to consumers and not hidden under a sub-menu or only available via email. I will automatically grow weary and suspicious if information about ethics and sustainability efforts are difficult to find or if a company does not respond quickly when that information is requested.

Supplying this information shouldn't just be a way of pushing the industry towards a more fair and sustainable

future but it should also be part of the customer service experience. The positive reaction transparency brings should be an incentive for companies to release more data about how they work and with who.

“A brand being honest about where they could be doing better or what they are trying improve brings me more comfort than a brand that decides to stay quiet or only answer questions when they're asked.”

WHAT DO WE MEAN BY TRANSPARENCY?

For Fashion Revolution, transparency means credible, comprehensive and comparable public disclosure of data and information about fashion's supply chains, business practices and the impacts of these practices on workers, communities and the environment.

When we talk about greater transparency, we mean public disclosure of sourcing relationships and of companies' social and environmental policies and practices, goals and targets, governance, performance and progress.

Transparency can enable greater accountability

Transparency is not just sharing the good stories nor disclosing only compliant, well-performing suppliers – it's about presenting the full picture, both good and not-so-good.

This sort of transparency requires brands and retailers to know exactly who makes the products they sell – from who stitched them right through to who dyed the fabric and who farmed the fibre. And crucially, this requires brands to trace the journey of their products right down to the raw material level. It requires that brands monitor and measure their outcomes and impacts, not just share their values and policies.

We ask brands to share information publicly so that we can collectively scrutinise all tiers of the supply chain, identify the best and worst practices and hold brands to account.

transparency



accountability



change

Transparency is not selective disclosure to third parties. We want to see public disclosure

Some brands opt to disclose supply chain information to selected multi-stakeholder groups or trade unions rather than publicly, and have done so for many years in order to manage their risks and solve issues. However, we feel this is not enough. Health and safety incidents, widespread abuses and even deaths are still happening and potentially can be solved faster if information is more freely available.

Being transparent does not necessarily mean acting ethically and sustainably

We want to stress that transparency is not to be conflated with brands behaving ethically and sustainably. This report is not looking at which brands are more environmentally friendly or conducting business more ethically than others. A brand may publish a considerable amount of information and data about their policies, practices and impacts and still have poor working conditions and environmental degradation happening in their supply chains. Conversely, brands may be doing all sorts of good things behind-the-scenes but don't talk about them publicly. It's a shame not to share publicly, as other brands could have much to learn from them.

Transparency is a tool for change, not the goal itself

Transparency by itself will not solve the industry's problems, but it provides an important window into the conditions in which our clothes are being made. What we each do with the information being disclosed by big brands and retailers is most important of all. It is with access to information that we hold brands and retailers, governments and suppliers to account. We see transparency as the first step towards wider systemic change for a safer, fairer and cleaner global fashion industry.

“None of the main issues which humanity is facing will be resolved without access to information.”

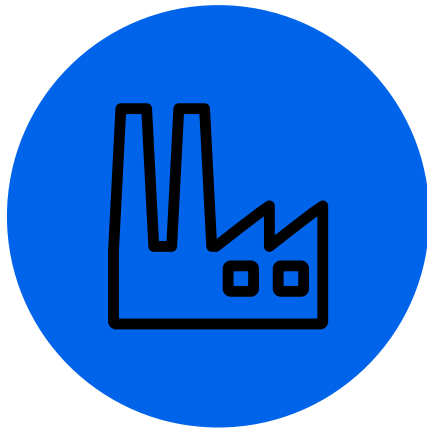
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CHRISTOPHER DELOIRE
SECRETARY GENERAL,
REPORTERS WITHOUT BORDERS, 2018

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**

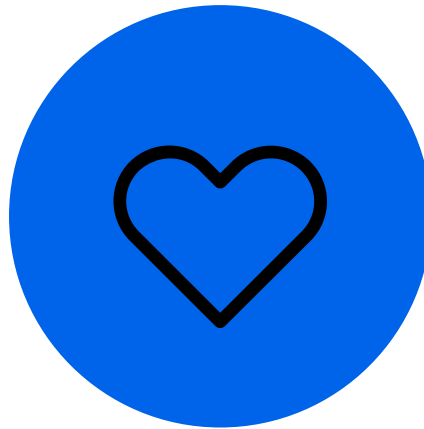
TO ACHIEVE SYSTEMIC CHANGE WE RECOGNISE 4 IMPORTANT THINGS:



It is 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 overconsumption and unsustainable business models.

We believe the first step is greater transparency. This will entail consumers, brands and retailers, governments and citizens each taking action. Fashion Revolution is engaging with all of these groups to catalyse positive change.



Inclusivity is key

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



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. This report is one tool that helps consumers and other stakeholders better understand what major brands are doing.

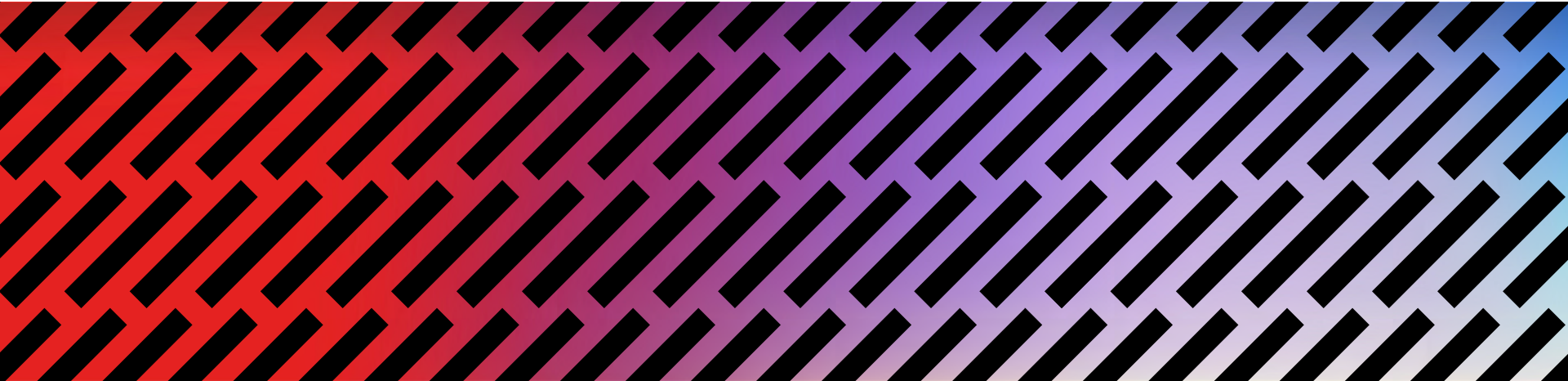


Turn data into action

Transparency isn't just for transparency's sake. The data and information disclosed by companies needs to be accessible and detailed enough to take action upon. What we do with publicly available supply chain information, how we use it to drive positive change, is what will count most.

2

ABOUT THE FASHION TRANSPARENCY INDEX



WHY HAVE WE CONDUCTED THIS RESEARCH?

Fashion Revolution is calling for greater transparency throughout the fashion industry and our #whomademyclothes social media campaign has inspired millions of people to take action since 2013.

To build on this question, we wanted to create a tool that would help people better understand what transparency looks like in practice, particularly when it comes to big fashion brands and retailers.

By conducting this research, we want to help people know a bit more about the brands and retailers they buy products from. Many of the brands included in the Fashion Transparency Index are selling special 'sustainable' collections but what about the rest of their products? Where are their clothes made, by whom and under what conditions?

What information can we expect to find about big brands' human rights and environmental policies and practices? What can we find out about the effects of their business practices on the people who work in their supply chains? These are some of questions that the Fashion Transparency Index research considers.

Furthermore, we wanted to create:

- A comparable tool that helps stakeholders better understand how much information major brands and retailers are disclosing;
- A tool to incentivise big brands and retailers to disclose more credible, comparable and detailed information year-on-year by utilising the competitive nature of business performance;
- An ongoing exercise that helps the Fashion Revolution movement shape its own understanding of what brands share about their suppliers and social and environmental impacts across the value chain; what transparency entails and what transparency demands we may ask in future from major brands and retailers.

“We developed the Fashion Transparency Index as a tool to scrutinise what major fashion brands disclose about their human rights and environmental policies, practices and impacts.”

SARAH DITTY
POLICY DIRECTOR,
FASHION REVOLUTION

THE METHODOLOGY

The Fashion Transparency Index uses a ratings methodology to benchmark brands' public disclosure across five key areas, including: policy and commitments, governance, supply chain traceability, supplier assessment and remediation, and new 'spotlight issues' covering gender equality, decent work, climate action and responsible consumption and production.

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

- Is there board level responsibility for the company's social and environmental impacts?
- Can a relevant department or individual be easily contacted with questions?
- How does the brand link human rights and environmental issues to its employee and supplier's performance?

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 disclose assessment findings?
- How can workers report grievances?

5.

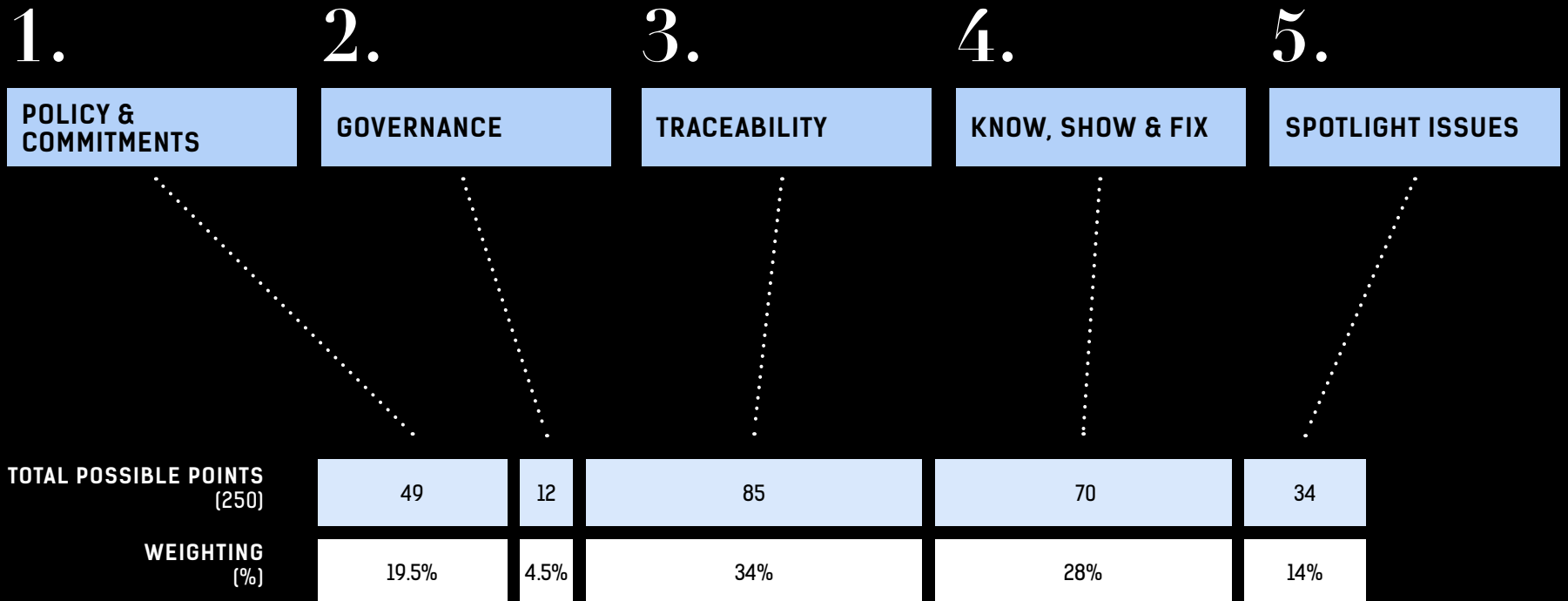
SPOTLIGHT ISSUES

- What is the brand doing to address gender equality and female empowerment?
- What is the brand doing to support Freedom of Association and the payment of living wages?
- What is the brand doing to tackle waste and recycling, sustainable production and climate change?

WEIGHTING OF THE SCORES

The 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 METHODOLOGY

The first iteration of the methodology was created by Ethical Consumer in 2016 with input from Fashion Revolution. For 2017, Fashion Revolution took the lead on the project's development and considerably revised the methodology. We spent four months consulting a diverse group of more than 20 industry experts on this revision process. The new methodology focuses exclusively on public disclosure of supply chain information, and we changed the weighting of the scores to emphasise increasing levels of detailed disclosure, especially in regards to disclosing supplier information.

We have updated the methodology again in 2019, making small changes for clarity, tweaking a few indicators to make it more ambitious and selecting new Spotlight Issues.

There are 202 indicators in the 2019 Fashion Transparency Index methodology.

The methodology has been designed by the Fashion Revolution team, led by Fashion Revolution's Policy Director, Sarah Ditty, with consultative input and feedback from a committee of pro bono industry experts, including:

- **Dr Mark Anner**, Director of Centre for Global Workers' Rights at Penn State University
- **Neil Brown**, Alliance Trust Investments
- **Professor Ian Cook**, University of Exeter
- **Orsola de Castro**, co-founder of Fashion Revolution and waste expert
- **Subindhu Garkhel**, Fairtrade Foundation
- **Jenny Holdcroft**, IndustriALL
- **Kate Larsen**, SupplyESChange Initiative

- **Dr Alessandra Mezzadri**, SOAS, University of London
- **Joe Sutcliffe**, Advisor – Dignified Work, CARE International
- **Heather Webb**, Ethical Consumer

And several others experts who wished to remain anonymous at this time.

The methodology is based on existing international standards and benchmarks including: UN Sustainable Development Goals, UN Guiding Principles, OECD Due Diligence Guidelines, Ethical Trading Initiative Base Code, and Fair Labor Association's Freedom of Association guidelines. It has also been developed to align as much as possible with other industry benchmarks and relevant initiatives including the Transparency Pledge, Corporate Human Rights Benchmark and Know The Chain.

We recognise that the methodology is not perfect and can always be improved. We welcome any feedback on how to make it better: transparency@fashionrevolution.org

For further detail of the exact methodology, download the 2019 brand questionnaire template [here](#).

UPDATES TO THE METHODOLOGY

Our annual revision process

Each year our policy and research team reviews every methodology indicator for clarity and makes amendments where we feel the wording could be clearer. We also consider the wider methodology in the context of recent industry developments, with special attention to any new laws and policies, reporting standards and emerging trends. We make amendments to relevant indicators where we feel they might better align to these recent industry developments and to ensure the Index remains a driver of best practice.

Sections 1 to 4 of the methodology have remained largely the same from 2017 to 2019, with minor amendments to a handful of indicators for clarity and alignment. For any changes to existing indicators or any proposed additional indicators throughout the questionnaire, we gather feedback from our pro bono consultation committee advisors.

Each year we select new Spotlight Issues in section 5, which are selected through consultation with the wider Fashion Revolution team and through our research into the latest industry developments. We also seek input from our pro bono consultation committee. The aim is to choose a selection of the most pressing challenges facing the sector for deeper investigation.

Spotlight Issues selected for 2019

This year we have observed many companies aligning their goals and strategies with the Sustainable Development Goals, so we have chosen 4 out of the 17 goals that are particularly relevant to the global fashion industry as this year's Spotlight Issues:

- SDG 5: Gender equality
- SDG 8: Decent work
- SDG 12: Responsible consumption and production
- SDG 13: Climate action

Within these 4 goals, we have honed in on issues that our team and advisors have identified as some of the sector's most urgent challenges, such as gender-based violence at work, the gender pay gap, freedom of association, living wages, purchasing practices, textile waste and recycling, circularity and climate footprint.

How this affects the scoring year-on-year

Because changes are made to the methodology each year, this may have an impact on the year-on-year direct comparability of the data results. This is why we would like to emphasise focusing on the range in which brands score rather than their individual scores. The ranges reveal patterns of disclosure and trends in transparency rather than precise measurements.

HOW WERE THE 200 BRANDS SELECTED?

Brands have been chosen on the basis of annual turnover representing over US\$500 million and crossing a spread of market segments including high street, luxury, premium, sportswear, accessories, footwear and denim from across Europe, North America, South America and Asia.

We relied on publicly available financial information to select brands and retailers. Some companies are privately held and do not publish financial records, including turnover, which means we may not have found them in our research.

Where brands are part of a parent company with annual turnover over US\$500 million, we have selected the brand or brands that appear to make up the most significant part of their business.

We have deliberately listed brands in our report rather than the parent company because consumers will be most familiar with brand names.

98 out of the 200 brands and retailers reviewed this year were included in the 2017 and 2018 report. A further 52 brands were reviewed in 2018 and again this year, for a total of 150 brands. There are 50 new brands included in the report this year, for a total of 200 brands. In 2020, we intend to expand the number of brands and retailers reviewed to 250.

Just a quick note: we often use the term 'brands' as short hand for both brands and retailers.

* In general, the scores for brands that 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; Kering Group and LVMH.

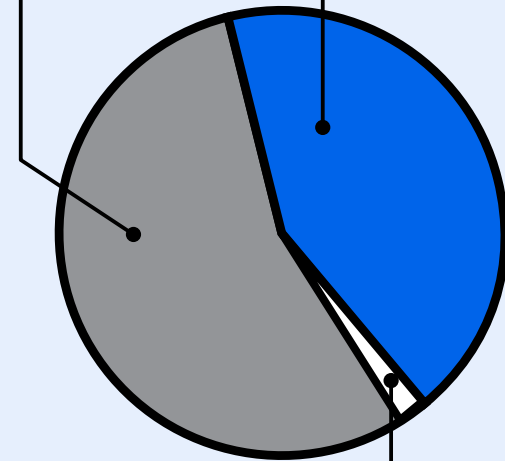
HOW MANY BRANDS PARTICIPATED THIS YEAR?

52%

did not respond

46%

of brands completed and returned a questionnaire



2%

declined the opportunity to complete the questionnaire

A-Z OF BRANDS

● = participated in brand questionnaire

Abercrombie & Fitch

Adidas (Adidas Group) ●

Aerostale

ALDI Nord (ALDI Einkauf GmbH & Co. oHG)

ALDI SOUTH (ALDI Einkauf GmbH & Co. oHG) ●

ALDO (The Aldo Group Inc.) ●

Amazon ●

American Eagle (American Eagle Outfitters, Inc.) ●

ANTA (ANTA International) ●

Anthropologie (URBN) ●

Armani (Giorgio Armani S.p.A) ●

ASICS

ASOS ●

Banana Republic (Gap Inc.) ●

Barneys New York

BCBGMAXAZRIA (Marquee Brands)

Beanpole (Samsung C&T Fashion Group)

Bershka (Inditex) ●

Bloomingdale's (Macy's Inc.)

Bonprix (Otto Group) ●

boohoo

Bottega Veneta (Kering) ●

Brooks Brothers

Brunello Cucinelli

Buckle

Burberry ●

Burlington

C&A ●

Calvin Klein (PVH) ●

Calzedonia (Calzedonia Holding S.p.A.)

Carolina Herrera (Puig)

CAROLL (Vivarte)

Carrefour - TEX

CELINE (LVMH)

Champion (Hanesbrands Inc.)

Chanel

Chico's

Claire's (Claire's Inc.)

Clarks (C&J Clark International Limited) ●

COACH (Tapestry, Inc.) ●

Cole Haan

Columbia Sportswear ●

Converse (Nike, Inc.) ●

Cortefiel (Tendam)

Costco - Kirkland Signature

Debenhams ●

Decathlon (Association Familiale Mulliez)

Desigual ●

Diane Von Furstenberg

Dick's Sporting Goods

Diesel (OTB Group)

Dillard's

Dior (LVMH)

Dolce & Gabbana

Dressmann (VARNER) ●

DSW (Designer Brands)

Eddie Bauer (Golden Gate Capital)

El Corte Inglés ●

Elie Tahari

Ermenegildo Zegna

Esprit ●

Express

Falabella (S.A.C.I.Falabella) ●

Famous Footwear (Caleres)

Fanatics (Kynetic)

Fendi (LVMH)

Foot Locker

Forever 21

Fossil (Fossil Group, Inc.)

Furla ●

Gap (Gap Inc.) ●

George at Asda (Walmart) ●

Gildan ●

G-Star RAW ●

Gucci (Kering) ●

GUESS

H&M ●

Hanes (Hanesbrands Inc.)

Heilan Home (Helian Group Co.)

Hermès

Hudson's Bay (HBC) ●

Hugo Boss ●

Intimissimi (Calzedonia Holding S.p.A.)

Ito-Yokado (SEVEN&I HLDGS.)

J.Crew ●

Jack & Jones (BESTSELLER) ●

JCPenney

JD Sports (Pentland Group)

Jessica Simpson (Sequential Brands Group)

Joe Fresh (Loblaws Inc.)

John Lewis ●

Jordan (Nike, Inc.) ●

Kate Spade (Tapestry, Inc.) ●

KiK

Kmart - Attention (Sears Holdings)

Kohl's

K-Way (BasicNet)

Lacoste (Maus Frères) ●

Lands' End (Sears Holdings)

Levi Strauss & Co ●

Lidl ●

Lindex (Stockmann) ●

Li-Ning

Liverpool (El Puerto de Liverpool)

LL Bean

LOFT (Ann Inc.) ●

Longchamp

Louis Vuitton (LVMH)

Lululemon ●

Macy's (Macy's Inc.)

Mammut (Conzzeta) ●

Mango ●

Marc Jacobs (LVMH)

Marks & Spencer ●

Marni (OTB Group)

Massimo Dutti (Inditex) ●

Matalan

Max Mara (MaxMaraFashionGroup)

Merrell (Wolverine World Wide)

Metersbonwe

Mexx

Michael Kors (Capri Holdings)

Miu Miu (Prada Group) ●

Mizuno

Moncler

Monoprix (Casino Group)

Monsoon ●

MRP (Mr Price Group Limited)

Muji (Ryohin Keikaku Group)

Neiman Marcus

New Balance ●

New Look (Brait) ●

New York & Company (RTW Retailwinds, Inc.)

NewYorker

Next ●

Nike (Nike, Inc.) ●

Nine West

Nordstrom ●

Old Navy (Gap Inc.) ●

OVS ●

Patagonia ●

Pimkie

Prada (Prada Group) ●

Primark (Associated British Foods) ●

Prisma (S Group) ●

Pull&Bear (Inditex) ●

Puma ●

Ralph Lauren ●

Reebok (Adidas Group) ●

REVOLVE

River Island

Ross Dress for Less

Russell Athletic (Fruit of the Loom)

s.Oliver ●

Sainsbury's - Tu Clothing ●

SAINT LAURENT (Kering) ●

Saks Fifth Avenue (HBC) ●

Salvatore Ferragamo

Sandro (SMCP) ●

Skechers

Speedo (Pentland Group)

Sports Direct

Steve Madden

Stradivarius (Inditex) ●

Superdry (SuperGroup plc.) ●

Takko

Target ●

Tchibo ●

Ted Baker

Tesco - F&F ●

Tezenis (Calzedonia Holding S.p.A.)

The North Face (VF Corporation) ●

Timberland (VF Corporation) ●

TJ Maxx (TJX Companies Inc.) ●

Tod's

Tom Ford

Tom Tailor ●

Tommy Bahama (Oxford Industries)

Tommy Hilfiger (PVH) ●

Topshop (Arcadia Group) ●

TOPVALU COLLECTION (AEON)

Tory Burch

Triumph

UGG (Deckers)

Under Armour

Uniqlo (Fast Retailing) ●

United Colors of Benetton ●

Urban Outfitters (URBN)

Valentino

Van Heusen (PVH) ●

Vans (VF Corporation) ●

Vero Moda (BESTSELLER) ●

Versace (Capri Holdings)

Very (Shop Direct)

Victoria's Secret (L Brands) ●

Walmart ●

Wrangler (VF Corporation) ●

Youngor (Youngor Group Company Limited)

Zalando ●

Zara (Inditex) ●

HOW THE RESEARCH IS CONDUCTED

The research was conducted by Sarah Ditty, Carry Somers, Ilishio Lovejoy, Sienna Somers, Julia Handler, Marzia Lafranchi, Katie Chappuis, Lisa Schneider, Eduardo Iracheta and Michelle Lai between December 2018 and April 2019.

The pro bono consultation committee members were called upon in special circumstances to provide guidance on their areas of expertise but were not involved in the final scoring of the brands and retailers.

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

ABOUT OUR RESEARCH & ENGAGEMENT PROCESS

August – December

Methodology updates: Each year we review industry trends and current laws, standards and reporting guidelines. We also consult with our pro bono committee of industry experts for feedback on the industry's most pressing challenges and emerging issues. We then make tweaks to existing indicators if needed as well as select new Spotlight Issues and formulate relevant indicators in consultation with our team and pro bono advisors. During this time we research and select our list of brands and retailers to be reviewed.

December – January

Research the selected brands and retailers: The research team researches each brand, pre-populating their Fashion Transparency Index questionnaire with as much relevant publicly disclosed information as we can find. At this time, brands are notified that we will be including them in the Index this year.

Mid-March

Brands return questionnaires: Participating brands return their completed questionnaires and our research team reviews the responses and gives additional points where further evidence is sufficient.

Mid-February

Brands sent their questionnaires to complete: The brands are given approximately one month to complete our questionnaire by filling in any additional disclosures our research team was unable to find.

Early February

Peer review of the pre-populated questionnaires: Researchers return the questionnaires and the lead researchers check each datapoint for accuracy.

Late March

Questionnaire review and quality assurance: The research team conducts several rounds of peer reviews and data quality assurance checks before finalising the questionnaires and scoring.

Early to mid-April

Data is compiled, analysis completed and report prepared: Data from all brand questionnaires gets transposed into a master dataset. The dataset is analysed to understand latest developments emerging trends and interesting findings. The final report is written and designed.

HOW DOES THE SCORING WORK?

What do brands and retailers receive points for?

Points are awarded only based on public disclosure from the following places:

- On the company's website(s);
- In annual reports or annual sustainability/CSR reports (only counted if dated January 2017 or later);
- In any other documents which are publicly available and can be downloaded freely and easily from the company's website(s);
- Via third party websites but only when linked to directly from the company's own website (i.e. there is a direct link from the company's website to the third party website.)

What else to note about the scoring?

The individual brand scores are not as important as the ranges in which they have scored.

In this sort of benchmarking exercise, it is not always easy to fit complex and nuanced issues into one neat and uniform methodology. Therefore, we want to stress that you use the Fashion Transparency Index findings to reflect on general trends in transparency rather than focus on whether brands scored one point higher or lower than another brand overall or in any particular area.

All averages in this report represent the mean. All scores have been rounded up or rounded down to the nearest whole percentage point.

What is within the scope of the research?

We have deliberately chosen to focus on what is publicly disclosed and not everything that brands are doing behind-the-scenes. Again, this is because transparency allows for wider scrutiny by consumers and stakeholders.

We have designed the methodology to provide insights that are comparable over time, reveal

patterns of data disclosure and allow brands to see where they stand on transparency compared to their peers.

What is beyond the scope of the research?

The Fashion Transparency Index does not offer an in-depth analysis of the content, quality or accuracy of a company's policies, procedures, performance, impacts or progress in any given area.

We cannot verify the information that is being published by the brands and retailers we have reviewed. Verification of claims is simply beyond our limited scope. This is why we encourage the information we do find to be scrutinised by other interested stakeholders so that these big brands are held to account for their claims.

Limitations of the research

Our team researched and scored brands regardless of whether or not they completed the questionnaire. Brands that completed the

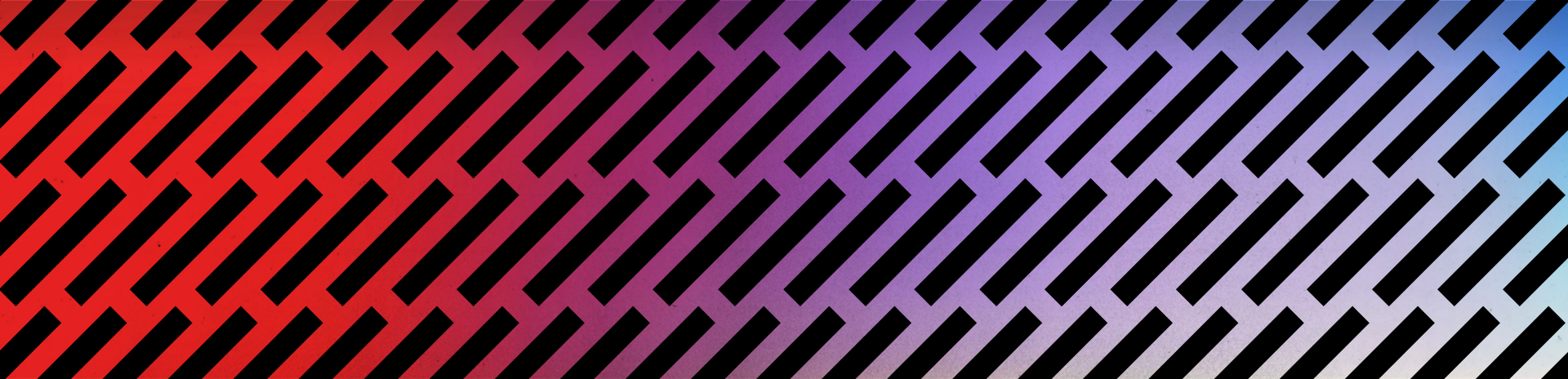
questionnaire were more likely to receive a higher score simply because our researchers may have been alerted to further information we hadn't already found ourselves.

There are notable limits to this type of desk-based research. Firstly, human error is entirely possible. There are 202 indicators in the 2019 methodology and applied across 200 brands, it adds up to approximately 40,000 individual data points. Many companies produce annual reports that span 200-400 pages. There is a high chance that our research team may have missed some relevant information. However, our research team endeavoured to be as thorough, accurate and fair as possible. Secondly, this research only captures a moment in time. Brands and retailers may disclose new information or retract information at any time.

3

THE FINAL SCORES

To download the full spreadsheet of results, click [here](#).



A ROUGH GUIDE TO THE SCORING

Total scores were out of 250 possible points, which we have converted into percentages. We chose to group brands into score ranges because we want readers to focus on emerging patterns and trends rather than individual scores.

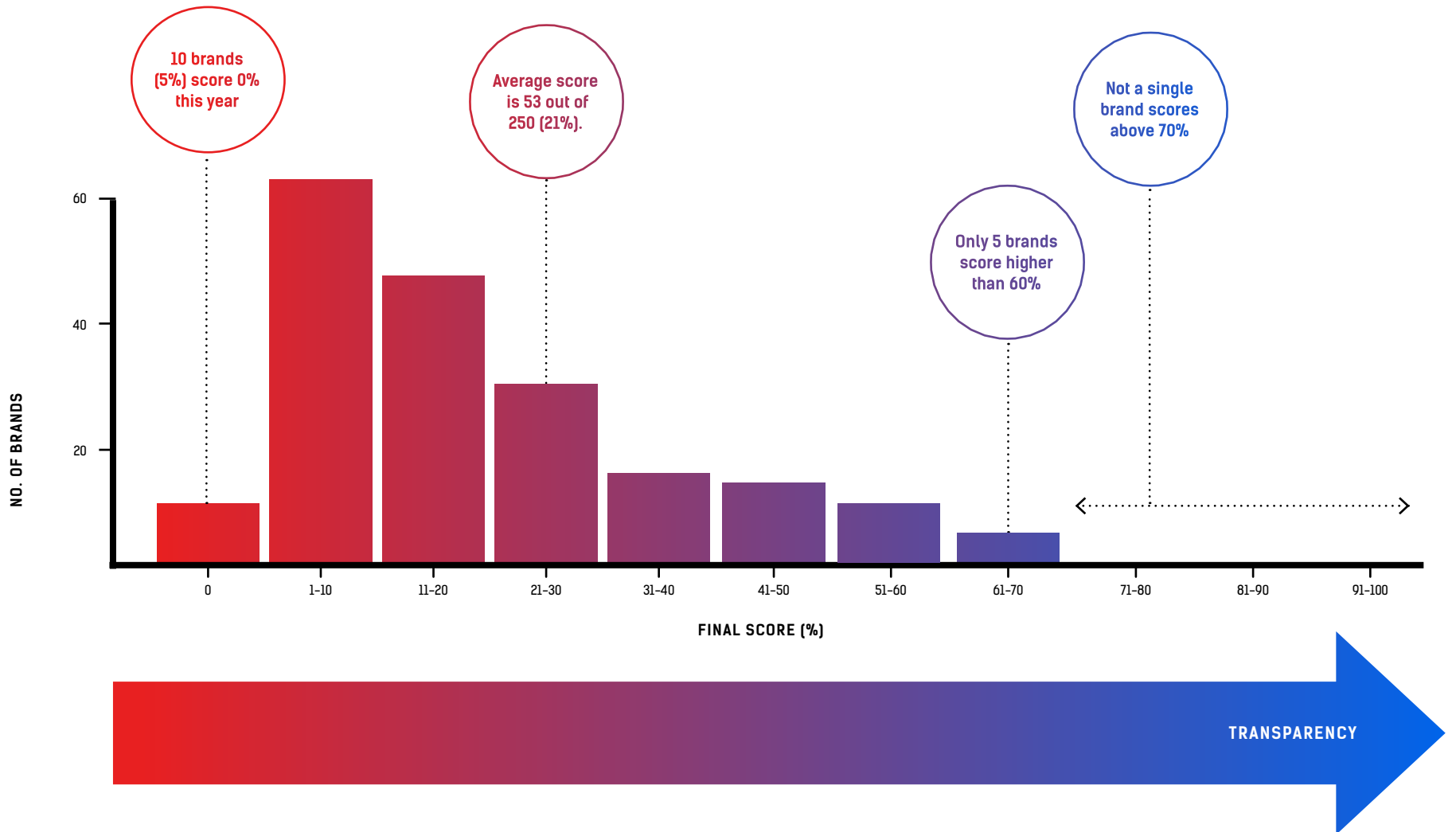


THE FINAL SCORES

0-10%	11-20%	21-30%	31-40%	41-50%	51-60%	61-70%	71-80%	81-90%	91-100%
Kohl's 10	Abercrombie & Fitch 20	ASICS 30	Gucci 40	Tchibo 49	C&A 60	Adidas 64			
ANTA 10	Fendi 20	New Look 30	Bottega Veneta 39	New Balance 47	ASOS 59	Reebok 64			
Chanel 10	Marc Jacobs 20	Debenhams 30	Tesco - F&F 39	Bershka 46	Puma 58	Patagonia 64			
Valentino 10	CELINE 20	Speedo 29	Bonprix 38	Massimo Dutti 46	Converse 57	Esprit 62			
Carolina Herrera 10	Salvatore Ferragamo 20	John Lewis 28	Uniqlo 38	Pull & Bear 46	Jordan 57	H&M 61			
Matalan 10	GUESS 20	Jack & Jones 28	SAINT LAURENT 38	Stradivarius 46	Nike 57				
Takko 10	Kate Spade 20	Vero Moda 28	George at Asda 38	Zara 46	The North Face 57				
Merrell 10	Miu Miu 20	Sainsbury's - Tu Clothing 28	Target 36	G-Star RAW 45	Timberland 57				
Burlington 10	Prada 20	Zalando 28	Primark 35	United Colors of Benetton 44	Vans 57				
Buckle 10	Lidl GB 19	Topshop 28	Burberry 33	Lindex 44	Wrangler 57				
Chico's 9	El Corte Inglés 19	Under Armour 28	Next 33	Hugo Boss 41	Marks & Spencer 56				
Sandro 9	Monoprix 19	Walmart 27	Hermès 31	Calvin Klein 41	Banana Republic 54				
s.Oliver 9	Very 19	LOFT 27	Dressmann 31	Van Heusen 41	Gap 54				
DSW 9	Decathlon 19	Clarks 26	Champion 31	Tommy Hilfiger 41	Old Navy 54				
Dick's Sporting Goods 9	Lands' End 18	OVS 25	Hanes 31	Gildan 41	Levi Strauss & Co 51				
River Island 9	Moncler 18	Mizuno 25		Lululemon 41					
Tom Tailor 9	Mango 18	Mammut 24							
Triumph 9	Carrefour - TEX 18	Victoria's Secret 23							
Versace 9	Nordstrom 18	Russell Athletic 23							
Ross Dress for Less 8	Kmart - Attention 18	COACH 22							
K-Way 8	Tod's 18	Louis Vuitton 22							
Steve Madden 8	Monsoon 17	Dior 22							
Desigual 7	ALDO 16	ALDI Nord 21							
Armani 7	Falabella 16	ALDI Süd 21							
Michael Kors 7	Cortefiel 15	Columbia Sportswear 21							
Famous Footwear 7	TJ Maxx 15	Hudson's Bay 21							
Muji 7	JCPenney 15	Saks Fifth Avenue 21							
Dillard's 7	Costco - Kirkland Signature 15	Ralph Lauren 21							
Sports Direct 7	MRP Apparel 14	Superdry 21							
Cole Haan 7	UGG 14	S Group - Prisma 21							
Skechers 6	American Eagle 14								
Neiman Marcus 6	Ito-Yokado 14								
Foot Locker 6	Amazon 14								
Li-Ning 6	Fossil 13								
Express 6	Kik 13								
Calzedonia 5	Bloomingdale's 13								
Forever 21 5	Macy's 13								
Anthropologie 5	Lacoste 13								
Urban Outfitters 5	J.Crew 12								
Intimissimi 5	Ted Baker 12								
Tezenis 5	boohoo 11								
Pimkie 5	TOPVALU COLLECTION 11								
Eddie Bauer 5	JD Sports 11								
Ermenegildo Zegna 4	Joe Fresh 11								
Claire's 4	Diesel 11								
Aeropostale 4	Brunello Cucinelli 11								
Fanatics 4	Marni 11								
LL Bean 4									
Dolce & Gabbana 3									
Tommy Bahama 3									
Tory Burch 3									
New York & Company 3									
Nine West 2									
Diane Von Furstenberg 2									
Liverpool 2									
CAROLL 2									
BCBGMAXAZRIA 2									
REVOLVE 1									
Brooks Brothers 1									
Barneys New York 1									
Furta 1									
New Yorker 1									
Longchamp 0									
Max Mara 0									
Heilan Home 0									
Beanpole 0									
Metersbonwe 0									
Youngor 0									
Jessica Simpson 0									
Mexx 0									
Elie Tahari 0									
Tom Ford 0									

* 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

QUICK FINDINGS



OVERALL ANALYSIS

BRANDS AND RETAILERS THAT HAVE SIGNIFICANTLY INCREASED THEIR LEVEL OF DISCLOSURE OVERALL, INCLUDE:

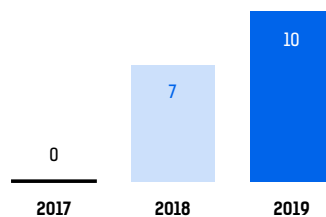
- +22%** Dior
- +21%** Sainsbury's
- +21%** Nike
- +18%** New Balance
- +17%** Marc Jacobs
- +11%** VF Corporation
- +10%** Uniqlo
- +9%** United Colors of Benetton
- +9%** Bonprix
- +9%** s.Oliver
- +9%** Sandro

This increase in scores is largely due to these brands and retailers publishing their supplier lists either for the first time or with much greater detail.

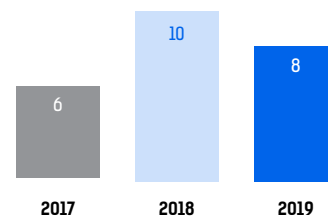
TOP 5 HIGH SCORING BRANDS SINCE 2017

2017		2018		2019	
49%	Adidas	+9	58%	Adidas	+6
48%	M&S	+10	56%	Puma	NEW
48%	H&M	+7	55%	H&M	+8
46%	Puma	+17	54%	Esprit	+6
46%	Gap Inc.	+8	54%	Gap Inc.	+7
				64%	Adidas
				64%	Patagonia
				62%	Esprit
				61%	H&M
				60%	C&A

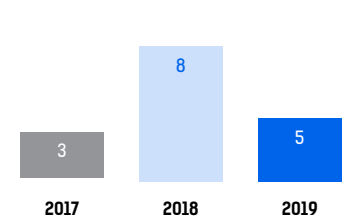
% OF BRANDS SCORING OVER 50



% OF BRANDS SCORING LESS THAN 2%



% OF BRANDS SCORING 0%



23% of the brands reviewed in 2018 and again in 2019 have seen their scores decrease this year. This could be the result of changes to their public sustainability communications, i.e. they simply may be disclosing less information this year, or due to the small changes to the methodology in 2019.

We have removed some indicators between 2018 and 2019 and we have made the language more ambitious in a few other indicators for 2019. As a result, some brands may not be scoring points this year that they were given last year in particular indicators. Please bear this in mind when reviewing the ranges in which the major brands are scoring.

“Fashion shouldn’t cost the earth. That is why the House of Commons Environmental Audit Committee explored the environmental and social impacts of the industry.

Our biggest retailers have ‘chased the cheap needle around the planet’, producing clothes in countries with low pay, little trade union representation and weak environmental laws. It’s a model of overproduction and overconsumption, based on the globalisation of indifference towards the people who make what we wear.

Transparency is essential if fashion is to tackle its waste, water, chemical and carbon footprint, and bring an end to labour abuses. The Fashion Transparency Index’s findings show some retailers are taking up the challenge, while others drag their feet. If one company can do it, why can’t they all?

The Government must support this, strengthening the UK Modern Slavery Act to require large retailers to ensure their clothes are being produced without forced or child labour would be a start.

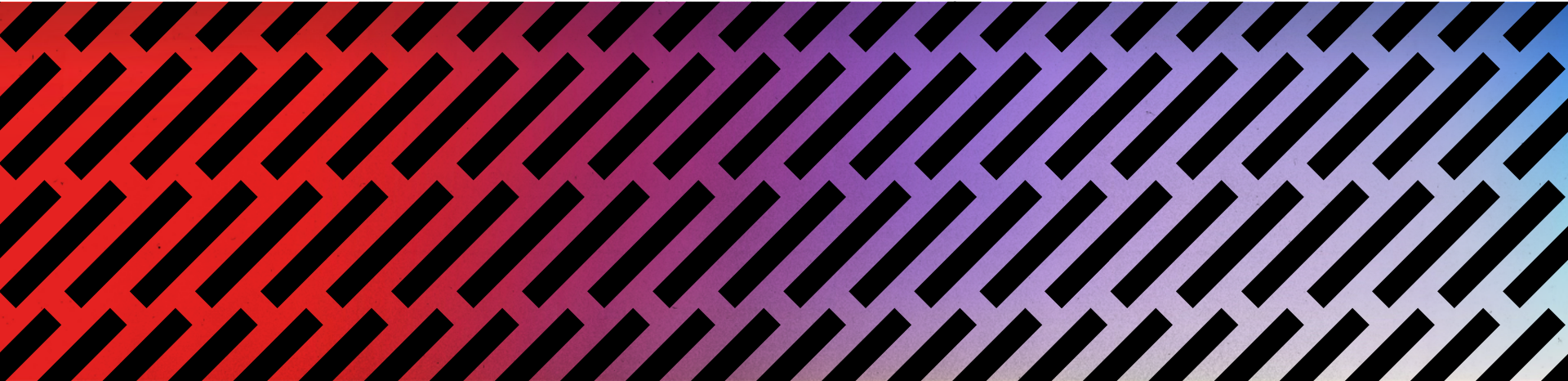
Our interim fashion report is [here](#), our final fashion report is [here](#)”.

MARY CREAGH
CHAIR OF THE ENVIRONMENTAL
AUDIT COMMITTEE AND MEMBER OF
PARLIAMENT FOR WAKEFIELD,
UK GOVERNMENT



4

THE FINAL SCORES: SECTION-BY-SECTION



AVERAGE SCORES ACROSS THE SECTIONS

48%

1.

POLICY & COMMITMENTS

Gucci and Bottega Veneta are the only brands to score 100% (all 49 points) in this section. Just over half of brands (101 brands) scored 50% or above. The greatest number of brands fell between the ranges of 61-70%, 31-40% and 0-10% this year. Meaning, we continue to see brands disclosing the most about their policies and commitments on social and environmental issues compared to any other section.

27%

2.

GOVERNANCE

Once again, this year the greatest number of brands score less than 10%, with over half (110) of brands scoring below 20%. This indicates a lack of disclosure from the majority of brands on who in the team is responsible for social and environmental issues, along with their contacts details, board level accountability and how staff (apart from the sustainability team) and suppliers are incentivised to improve social and environmental performance. Bottega Veneta, Gucci, Hugo Boss, Marks & Spencer, Puma and Saint Laurent are leading in this section, all scoring 100% of the possible points.

12%

3.

TRACEABILITY

We are seeing a positive increase in the number of brands publishing their supplier lists this year; 70 brands are now publishing first-tier supplier lists, 38 are publishing their processing facilities and 10 are publishing details of their raw material suppliers. That being said, when we look at brands' average scores for this section, we find almost two thirds of brands (128) score in the 0-10% category, meaning there are many brands not disclosing their suppliers. The highest scoring brands for this category are Patagonia and Esprit, both scoring between 71-80%. Traceability remains the section with the lowest average score again this year.

14%

4.

KNOW, SHOW & FIX

The highest concentration of brands this year remains in the 0-10% range with 111 brands disclosing little about their supplier assessment and remediation processes. Adidas and Reebok score highest, in the range of 51-60%. Most brands disclose their supplier assessment processes and procedures. However, brands share little information about the results of these efforts, and in most cases, we found this disclosure via links to third party organisations such as the Bangladesh Accord. Brands also share very little about the outcomes of their efforts to fix problems within their supply chain when found.

17%

5.

SPOTLIGHT ISSUES

H&M leads by a large margin in this section being the only brand to score between 71-80%, meaning it publishes the most information relating to the Sustainable Development Goals, in particular; SDG 5: Gender equality, SDG 8: Decent work, SDG 12: Sustainable consumption and production and SDG 13: Climate action. All other brands score less than 60% in this section, and the greatest number of brands score 0-10%.

1. POLICY & COMMITMENTS *APPROACH*

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

We looked at the following issues:

- Animal Welfare
- Annual Leave & Public Holidays
- Anti-bribery, Corruption & Presentation of False Information
- Biodiversity
- Child Labour
- Community Engagement
- Contracts & Terms of Employment
- Discrimination
- Diversity & Inclusion
- Energy & Carbon Emissions
- Equal Pay
- Forced or Bonded Labour
- Foreign & Migrant Labour
- Freedom of Association, Right to Organise & Collective Bargaining
- Harassment & Abuse
- Health & Safety
- Living Conditions/
- Dormitories
- Maternity Rights/ Parental Leave
- Notice Period, Dismissal & Disciplinary Action
- Overtime Pay
- Restricted Substance List
- Sub-contracting, Outsourcing & Homeworkers
- Wages & Financial Benefits (e.g. bonuses, insurance, social security, pensions)
- Waste & Recycling (Packaging/Paper)
- Waste & Recycling (Product/Textiles)
- Water Effluents & Treatment
- Water Usage
- Working Hours & Rest Breaks & Footprint

We typically found this information in the following places:

- Brand/retailer commercial website;
- Corporate website;
- Parent company website;
- Company's own sustainability or corporate responsibility microsite;
- Investor relations website (so long as weblink made available via their main website);
- Another external third party website (e.g. online data platform, NGO partner, data sharing initiative, another benchmarking disclosure - so long as weblink made available via their main website);
- Financial statements published by the company (so long as weblink made available via their main website);
- Any other relevant report or document (so long as weblink made available via their main website).

What information sources we do not count:

- Clothing labels and hang tags on products;
- In-store or at other physical locations;
- Smart phone apps;
- Social media channels;
- A third party website or document where there is no weblink from the company's own website, including press articles;
- Downloadable documents where the weblink cannot be found on the company website.

Social & environmental priorities and goals for the future

We looked to see whether brands and retailers are disclosing their key human rights and environmental priorities (typically in the form of a materiality assessment). Some issues will be more relevant and timely for each brand, and we wanted to understand how they decide upon these priorities and what these priorities are. 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 value chain. We only counted these goals if they were reaching into the future, time-bound and measurable. We also awarded points if brands are reporting on their progress towards achieving these goals.

Finally, we looked to see if the human rights and environmental data reported by major brands is audited by an independent third party organisation, typically this is conducted by a large global accounting firm.

1. POLICY & COMMITMENTS

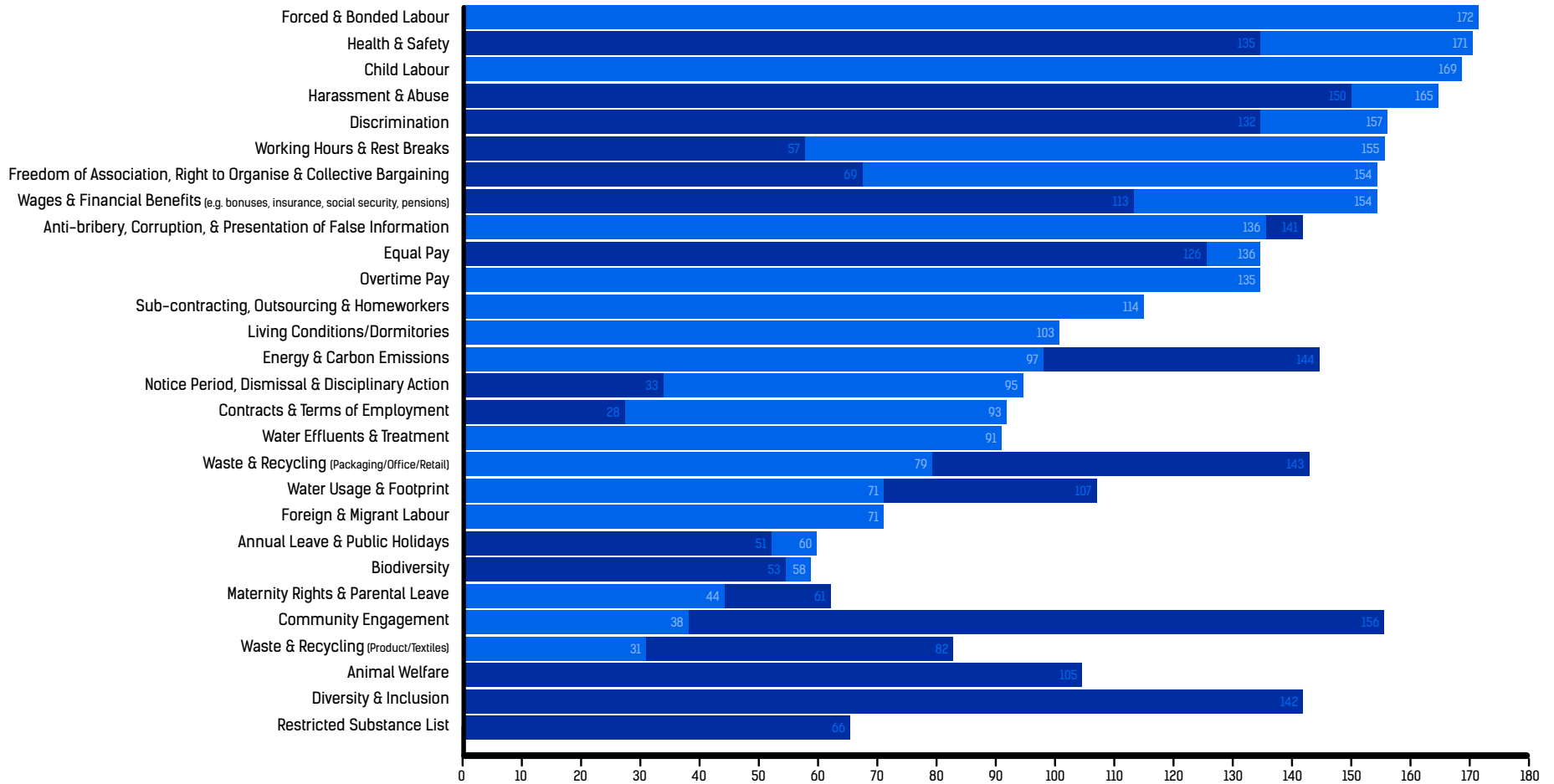
0-10%		11-20%		21-30%		31-40%		41-50%		51-60%		61-70%		71-80%		81-90%		91-100%	
Calzedonia	9	Express	20	Brunello Cucinelli	30	Russell Athletic	40	ALDI Süd	50	Decathlon	60	Hermès	70	G-Star RAW	80	Converse	90	Bottega Veneta	100
CAROLL	9	Li-Ning	19	JD Sports	30	Carolina Herrera	39	Bloomingdale's	50	El Corte Inglés	60	Next	70	Target	79	Jordan	90	Gucci	100
Intimissimi	9	Claire's	18	Takko	30	J.Crew	39	Fossil	50	Dressmann	59	ASICS	69	Uniqlo	79	Nike	90	Adidas	99
New York & Company	9	Dillard's	17	Very	29	Diesel	38	Macy's	50	Kmart - Attention	59	Bonprix	69	George at Asda	78	Tchibo	90	Reebok	99
Tezenis	9	Dolce & Gabbana	17	Desigual	28	Ito-Yokado	38	TJ Maxx	50	Miu Miu	59	Dior	69	Lindex	78	ASOS	88	Marks & Spencer	97
Nine West	8	Eddie Bauer	17	Dick's Sporting Goods	27	Marni	38	Hudson's Bay	49	Nordstrom	59	Under Armour	69	OVS	78	Bershka	88	Puma	97
BCBGMAXAZRIA	7	Ermenegildo Zegna	16	DSW	27	Columbia Sportswear	37	Saks Fifth Avenue	49	Prada	59	CELINE	68	Lululemon	76	Massimo Dutti	88	SAINT LAURENT	95
Liverpool	7	Muji	16	Anthropologie	26	Falabella	37	ALDI Nord	48	Mango	58	Fendi	68	Topshop	74	Pull & Bear	88	C&A	93
Diane Von Furstenberg	6	Tory Burch	14	K-Way	26	s.Oliver	37	Lacoste	48	S Group - Prisma	56	Louis Vuitton	68	Walmart	74	Stradivarius	88	H&M	92
Brooks Brothers	5	Aeropostale	13	Urban Outfitters	26	Chanel	36	MRP Apparel	48	Tod's	55	Marc Jacobs	68	Tesco - F&F	73	Zara	88	Banana Republic	91
Barneys New York	4	LL Bean	13	Matalan	24	Merrell	36	Sainsbury's - Tu Clothing	48	Cortefiel	54	Primark	68	New Look	72	Hugo Boss	87	Gap	91
Furla	4	Tommy Bahama	13	River Island	24	Steve Madden	35	Champion	47	Debenhams	54	Lands' End	67	United Colors of Benetton	71	Burberry	86	Old Navy	91
New Yorker	3	Fanatics	11	Skechers	24	TOPVALU COLLECTION	35	Hanes	47	Monsoon	53	LOFT	67			Calvin Klein	86		
Max Mara	2			Neiman Marcus	23	Valentino	35	Lidl GB	46	Victoria's Secret	53	New Balance	67			Van Heusen	86		
Beanpole	1			Sports Direct	23	Triumph	34	Ted Baker	45	ALDO	52	Jack & Jones	66			Zalando	86		
Heilan Home	1			Famous Footwear	22	Versace	34	American Eagle	44	Costco - Kirkland Signature	52	Vero Moda	66			Tommy Hilfiger	86		
Metersbonwe	1			Foot Locker	22	Buckle	33	UGG	44	Mizuno	52	John Lewis	65			Esprit	85		
REVOLVE	1			Michael Kors	22	Burlington	33	Abercrombie & Fitch	43	Amazon	51	Monoprix	65			Levi Strauss & Co	83		
Elie Tahari	0			Cole Haan	21	Kohl's	33	Kik	43	JCPenney	51	Gildan	64			Patagonia	83		
Jessica Simpson	0			Forever 21	21	Sandro	33			Mammut	51	GUESS	63			The North Face	81		
Longchamp	0					Joe Fresh	32					Ralph Lauren	63			Timberland	81		
Mexx	0					ANTA	31					Speedo	63			Vans	81		
Pimkie	0					Armani	31					Carrefour - TEX	62			Wrangler	81		
Tom Ford	0					boohoo	31					Superdry	62						
Youngor	0					Chico's	31					Clarks	61						
						Ross Dress for Less	31					COACH	61						
						Tom Tailor	31					Kate Spade	61						
												Moncler	61						
												Salvatore Ferragamo	61						

* Brands ranked in numerical order by score out of 250, but shown as the nearest full 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?*



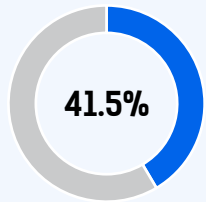
* Graph ordered by most common policies that apply to suppliers

1. POLICY & COMMITMENTS

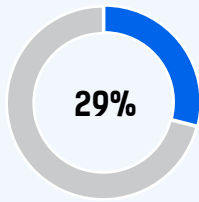
FINDINGS

SNAPSHOT OF FINDINGS

BIODIVERSITY

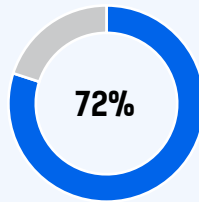


of brands disclose a company policy

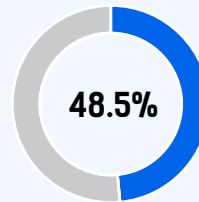


disclose supplier policies

CARBON EMISSIONS

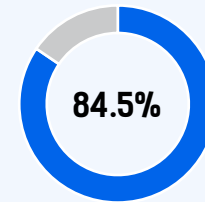


publish a company policy

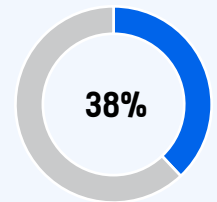


publish supplier policies

CHILD LABOUR

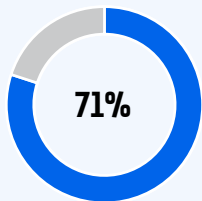


disclose supplier policies

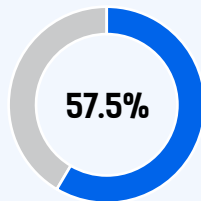


disclose how their policies are implemented

DIVERSITY & INCLUSION

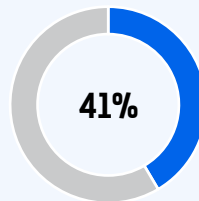


publish a company policy

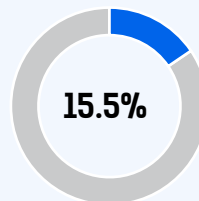


disclose how their policies are implemented

TEXTILE WASTE AND RECYCLING

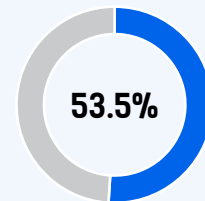


now disclose a company policy

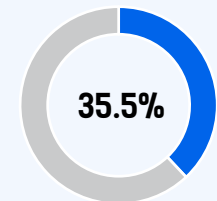


disclose supplier policies

WATER USAGE



publish a company policy



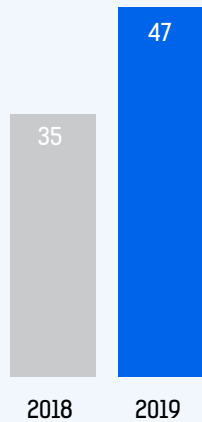
disclose supplier policies

1. POLICY & COMMITMENTS

FINDINGS

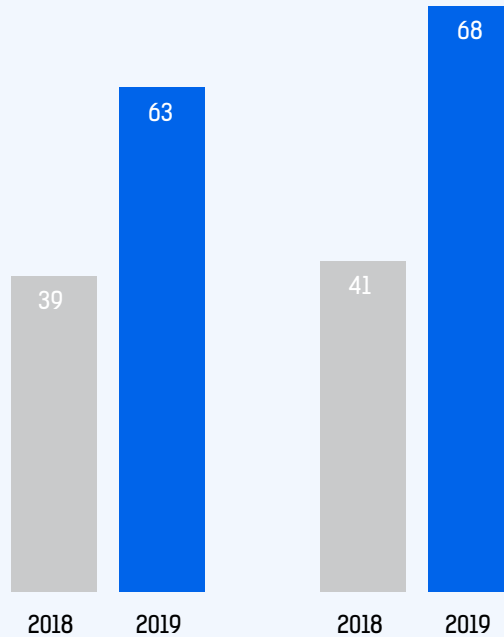
SNAPSHOT OF FINDINGS

ANIMAL WELFARE



% of brands disclose how they implement their policies

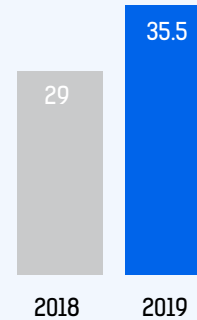
EQUAL PAY



% of brands publish an equal pay policy

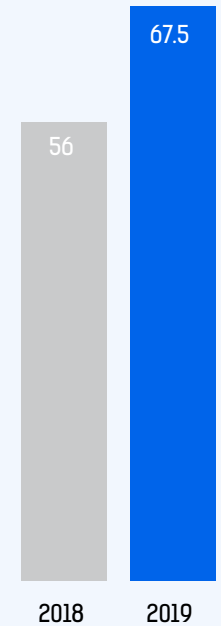
% of brands publish supplier policies on equal pay

MIGRANT WORKERS



% of brands publish supplier policies on foreign and migrant labour

OVERTIME PAY



% of brands publish supplier policies on foreign and migrant labour

1. POLICY & COMMITMENTS

IMPLICATIONS

Most leading fashion brands publish policies on grievous issues

At company level, the majority of brands disclose policies on grievous issues such as corruption and bribery (70.5%), discrimination (75%), health and safety (67.5%) and the big environmental topics such as carbon emissions (72%) and waste/recycling (71.5%). When it comes to issues that tend to be better regulated in the large consumer markets there is less information shared by the major brands – for example, holidays and annual leave (25.5%), terms of employment (14%), maternity rights and parental leave (30.5%) and working hours (28.5%).

When it comes to the supplier level, even more brands disclose supplier policies on grievous issues such as child labour (84.5%), discrimination (82.5%), forced and bonded labour (86%), harassment and abuse (78.5%) and health and safety (85.5%). In countries where the bulk of the world's garment manufacturing happens, enforcement of labour and environmental regulations tends to be weaker – so we see a lot of brands disclosing supplier policies on issues

such as freedom of association and the right to unionise (77%), wages (77%) and working hours (77.5%), policies that fewer brands publicly disclose for their own workforce.

Interestingly, 78% of brands report what their community engagement approach is at company level but only 19% of brands include community engagement in their supplier policies.

Not enough information shared publicly about how fashion brands put their policies into action

When it comes to explaining how brands' policies are put into practice, whether it is through specific detailed procedures or through partnership programmes, major brands tend to disclose less information. This means the public often has no way of knowing what brands are doing to ensure their policies are implemented nor whether their policies equate to much more than a wish-list or box-ticking exercise.

We see the majority of brands (79%) explain what they're doing in the community, often through their

philanthropic efforts, but when it comes to grievous issues we have found that fewer brands disclose how they're putting those policies into action – child labour (38%), discrimination (43%), freedom of association and the right to unionise (40.5%), harassment and abuse (29.5%) and working hours (37%).

Interestingly, 52.5% of brands publish an animal welfare policy, and 47% explain how this policy is put into practice. This is good progress from last year where we saw 35% of brands disclosing how they're implementing their animal welfare policies.

On environmental topics, energy and carbon emissions seems to be where brands are sharing the most about their implementation activities. 73% of brands publish their efforts to reduce carbon emissions and increase energy efficiency while only 38.5% of brands share the same sort of information about biodiversity and 43% of brands publish procedures on water treatment and effluents.

Understanding how major brands prioritise human rights and environmental issues

When it comes to how major brands are deciding which environmental and human rights issues they should be prioritising in their business, we looked to see if they were publishing a materiality assessment, which is a type of analysis that helps them identify these priorities. We found that 41% of brands are disclosing their process for doing this sort of materiality assessment and 41.5% of them share what those human rights and environmental priorities are with the public.

Many brands share measurable environmental targets but fewer share goals on improving human rights

We also looked to see if major brands are setting themselves time-bound, measurable goals for improving human rights and environmental impacts and sharing those goals publicly. We found that 54% of the brands are publishing goals on improving environmental impacts but only 40% are disclosing human rights related goals.

1. POLICY & COMMITMENTS IMPLICATIONS

Good progress in policy disclosure but more to be done

This year amongst the 200 leading brands the average score on transparency of policy and commitments is 48%, compared to 46% amongst the 150 brands reviewed last year – so we are seeing some progress.

If we look just at the 150 brands reviewed last year and again in 2019, we see their average score on policy and commitments move from 46% in 2018 to 54% in 2019, a significant 8% increase in transparent disclosure since last year.

Again this year, Gucci and Bottega Veneta are the highest scorers in the Policy & Commitments section at 100%, with Adidas and Reebok at 99%, Marks & Spencer and Puma at 97% and Saint Laurent at 95%, meaning that they are disclosing ample information about their social and environmental policies, procedures and goals for improvements in the future.

The key take-away is that major brands are disclosing quite a lot of information about their human rights and environmental policies but are still not sharing enough information about how they prioritise these issues in their business, what goals they have set themselves for improving human rights and environmental impacts going forward and how they put their policies into practice. There is still considerable

room for improvement across most brands reviewed.

Examples of good practice in transparency

This year we wanted to highlight a few examples of best practice disclosure in each section of the methodology.

ASOS has detailed [young worker and child labour policies](#) and remediation procedures in place and work closely with Anti-Slavery International and others to tackle forms of modern slavery. They have not been shy in talking publicly about the instances where they have uncovered cases of child labour in Turkey, China and India and poor working conditions in Mauritius, India and the UK, including a detailed explanation of the steps they have taken to solve these cases and the outcomes of those interventions. You can read about these cases in their [Modern Slavery Act statement](#).

Patagonia publishes extensive standards and implementation [guidance on employing migrant contract workers](#), which includes practical worksheets, step-by-step approaches and checklists.

For its own employees, Chanel details a progressive parental leave policy in its first ever [Report to Society](#) (page 61), which offers 14 weeks of leave at full pay for all new parents – both women and men.

Gucci, Bottega Veneta and Saint Laurent (all owned by Kering Group) publish very comprehensive [guidelines for raw material suppliers](#), covering everything from cotton and silk to paper, wood, metals and gemstones. These guidelines also include extensive standards and procedures for manufacturing processes such as leather tanning, spinning, weaving, dyeing, printing, finishing and shoe production. This document gives you a sense of the level of detail they are going into as they work towards responsible and sustainable production across their brands and various product groups.

H&M publishes [Chemical Restrictions policies](#) for every single product group they sell, whilst Inditex (Bershka, Massimo Dutti, Pull&Bear, Stradivarius and Zara) publishes a detailed [global water management strategy](#) and guidelines.

Levi Strauss & Co. publishes a comprehensive [Sustainability Guidebook](#), at a whopping 284 pages, that covers detailed policies

and procedures on everything from sanitation and hygiene to water effluents and pollution to gender equality and foreign migrant workers. This guidebook also clearly explains what types of conditions they consider to be zero tolerance issues that need immediate action or require continuous improvement for every single topic covered. This document is also available in multiple languages.

[Topshop](#) also publishes a comprehensive 4-part Code of Conduct Guidebook, including an unique Right to Organise Guarantee in multiple languages.

C&A publishes their [human rights and environmental goals](#) from 2015 to 2020 and explains in a clear and detailed way what are their key challenges, the steps they are taking to address them, the progress they are making and case studies for each major goal they have set.

These are just a few highlights and, of course, there are many other examples we have not yet mentioned. We could also highlight plenty of examples of weak policies and lack of procedures and commitments – which we will not go into for the sake of brevity.

2. GOVERNANCE *APPROACH*

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

In this section, we wanted to understand who in the company is accountable for social and environmental performance and impacts.

First, we looked to see if brands publish direct contact details for a sustainability or ethical trade department in the company. Then we looked to see if they shared direct contact details for the person or people with lead responsibility. This demonstrates an open line of communication between the brand and its customers and stakeholders.

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

Employee, Executive and Supplier incentives for improving performance

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

We looked for the same information to be shared linking CEO and executive level pay and incentives to human right impacts and environmental management.

Finally, we also looked to see how suppliers' incentives are linked to improvements in human rights impacts and environmental management. The types of incentives we were looking for included brands committing to long-term contracts, increased orders, price premiums and fewer audits.

"A lack of transparency results in distrust and a deep sense of insecurity."

—
DALAI LAMA

2. GOVERNANCE

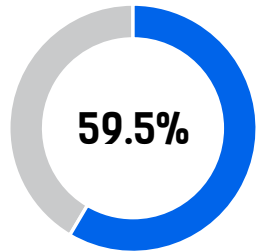
0-10%		11-20%		21-30%		31-40%		41-50%		51-60%		61-70%		71-80%		81-90%		91-100%	
Bloomingdale's	8	Abercrombie & Fitch	17	American Eagle	25	ALDI Nord	33	Banana Republic	50			Adidas	67			C&A	83	Bottega Veneta	100
boohoo	8	ALDO	17	ASICS	25	ALDI Süd	33	Bershka	50			Bonprix	67			H&M	83	Gucci	100
CAROLL	8	Amazon	17	DSW	25	ANTA	33	Calvin Klein	50			Burberry	67			The North Face	83	Hugo Boss	100
Chico's	8	Armani	17	Lidl GB	25	ASOS	33	Esprit	50			Converse	67			Timberland	83	Marks & Spencer	100
Decathlon	8	Buckle	17	Mango	25	Brunello Cucinelli	33	Falabella	50			Dressmann	67			Vans	83	Puma	100
Macy's	8	Burlington	17	Superdry	25	COACH	33	Gap	50			George at Asda	67			Wrangler	83	SAINT LAURENT	100
Aeropostale	0	Calzedonia	17	TOPVALU COLLECTION	25	Columbia Sportswear	33	Gildan	50			Jordan	67						
Anthropologie	0	Carolina Herrera	17			Dior	33	Levi Strauss & Co	50			Lululemon	67						
Barneys New York	0	Carrefour - TEX	17			G-Star RAW	33	Lindex	50			Nike	67						
BCBGMAXAZRIA	0	CELINE	17			GUESS	33	Massimo Dutti	50			Reebok	67						
Beanpole	0	Champion	17			Hudson's Bay	33	New Balance	50			Sainsbury's - Tu Clothing	67						
Brooks Brothers	0	Clarks	17			Jack & Jones	33	Next	50			Tchibo	67						
Chanel	0	Cole Haan	17			Joe Fresh	33	Old Navy	50			Walmart	67						
Claire's	0	Debenhams	17			Kate Spade	33	OVS	50			Zalando	67						
Cortefiel	0	Desigual	17			Kmart - Attention	33	Patagonia	50										
Costco - Kirkland Signature	0	Diane Von Furstenberg	17			LOFT	33	Primark	50										
Dick's Sporting Goods	0	Diesel	17			Louis Vuitton	33	Pull & Bear	50										
Dolce & Gabbana	0	Dillard's	17			Mammut	33	S Group - Prisma	50										
Eddie Bauer	0	El Corte Inglés	17			Miu Miu	33	Stradivarius	50										
Elie Tahari	0	Ermenegildo Zegna	17			Mizuno	33	Tesco - F&F	50										
Express	0	Famous Footwear	17			Moncler	33	Tommy Hilfiger	50										
Fanatics	0	Fendi	17			Monoprix	33	Topshop	50										
Forever 21	0	Foot Locker	17			Monsoon	33	United Colors of Benetton	50										
Fossil	0	Hanes	17			Prada	33	Van Heusen	50										
Furla	0	Hermès	17			Russell Athletic	33	Victoria's Secret	50										
Heilan Home	0	Intimissimi	17			Saks Fifth Avenue	33	Zara	50										
Ito-Yokado	0	J.Crew	17			Salvatore Ferragamo	33												
Jessica Simpson	0	JCPenney	17			Target	33												
Kohl's	0	JD Sports	17			Tod's	33												
Lacoste	0	John Lewis	17			Vero Moda	33												
Li-Ning	0	Kik	17			Versace	33												
LL Bean	0	K-Way	17																
Longchamp	0	Lands' End	17																
Matalan	0	Liverpool	17																
Max Mara	0	Marc Jacobs	17																
Merrell	0	Marni	17																
Metersbonwe	0	MRP Apparel	17																
Mexx	0	Neiman Marcus	17																
Michael Kors	0	New Look	17																
Muji	0	Nordstrom	17																
New York & Company	0	Pimkie	17																
New Yorker	0	Ralph Lauren	17																
Nine West	0	REVOLVE	17																
Ross Dress for Less	0	River Island	17																
s.Oliver	0	Speedo	17																
Sandro	0	Takko	17																
Skechers	0	Tezenis	17																
Sports Direct	0	TJ Maxx	17																
Steve Madden	0	UGG	17																
Ted Baker	0	Under Armour	17																
Tom Ford	0	Uniqlo	17																
Tom Tailor	0	Valentino	17																
Tommy Bahama	0																		
Tory Burch	0																		
Triumph	0																		
Urban Outfitters	0																		
Very	0																		
Youngor	0																		

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

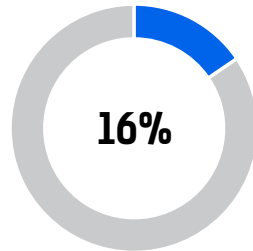
2. GOVERNANCE

FINDINGS

CAN ANYONE EASILY CONTACT MAJOR FASHION BRANDS?

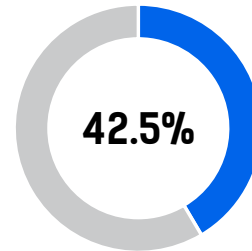


publish direct contact details of their sustainability or corporate responsibility team

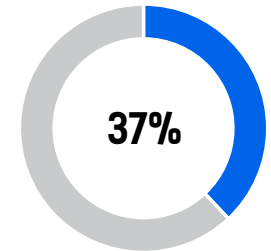


disclose the name and direct contact details of the person with lead responsibility for human rights and environmental impacts in the business

IS THERE HIGH-LEVEL ACCOUNTABILITY?

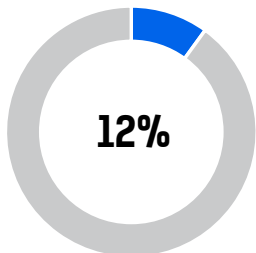


disclose who on the board holds responsibility for the company's human rights and environmental impacts

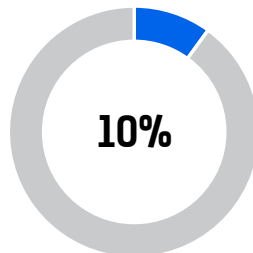


publish a description of how board level accountability is implemented

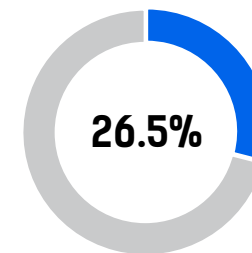
INCENTIVES FOR PROGRESS



explain how employee incentives (pay and bonuses) are tied to improvements in social and environmental impacts



explain how executive level incentives (pay and bonuses) are tied to improvements in social and environmental impacts



explain how suppliers are rewarded for improvements in working conditions and environmental management (increased orders, longer contracts, fewer audits)

2. GOVERNANCE *IMPLICATIONS*

In PwC's 17th [Annual Global CEO Survey](#), 75% of CEOs agree with the statement that satisfying societal needs (beyond those of investors, customers and employees) and protecting the interests of future generations is important. But what are big brands willing to tell us about the way their company embeds social and environmental performance into the business from board level to their own employees and in the supply chain?

Board accountability for human rights and environmental impacts

42.5% of brands are disclosing the name of the board member or board level committee that holds ultimate responsibility for human rights and environmental issues in the company, and 37% of brands explain how this board accountability is implemented in practice.

Incentivising improvements in human rights and environmental impacts

We looked to see how major brands are incentivising their own employees, their executives and directors and their suppliers to improve human rights impacts and environmental management. By incentives for employees and executives, we mean whether their job performance reviews, pay and bonuses are tied to improvements in these areas. We found that only 12% of brands disclose how their own employees (sourcing, designers, buyers, merchandisers, etc.) are incentivised to achieve human rights and environmental improvements.

Only 10% of brands report linking CEO and executive level pay and incentives to human right impacts and environmental management, which begs the question: how seriously are they taking these issues?

For suppliers, the types of incentives we were looking for included brands committing to long-term contracts, increased orders, price premiums and fewer audits. 26.5% of brands disclosed having such incentives in place for their suppliers.

Enabling customers and stakeholders to get in touch

One simple act of transparency brands can take is to provide a way to contact the corporate responsibility or sustainability team directly. This allows an open line of communication between the brand and its customers and stakeholders who would like to ask a question or raise a concern. This is why we look for brands to share a direct email address or phone number for this department. We have found that 119 of the 200 brands (59.5%) do share direct contact details for the sustainability team, and 32 brands (16%) go further by publishing the

direct contact details of the person with the lead responsibility for human rights and environmental issues in the company. In fact, [Tesco](#) even provides the email address of their CEO.

The highest scoring brands in the governance section this year are Gucci, Bottega Veneta and Saint Laurent (all owned by Kering Group) as well as Hugo Boss, Marks & Spencer and Puma – all scoring 100%.

The average score in the governance section this year is 27%, compared to 36% amongst the 150 brands reviewed last year. Although there is a higher number of brands disclosing information in most of the governance indicators this year, we have added 50 new brands to this Index for 2019, many of whom are not disclosing this information, and this brings down the average score. We have also changed the wording of a few of the governance indicators this year to

2. GOVERNANCE *IMPLICATIONS*

make the criteria more ambitious. This means we are pushing brands further towards disclosing information that enables them to be held accountable.

Next year we would like to see closer to 75% of brands publishing direct contact details for the team of people responsible for human rights and environmental issues. This is our challenge to the leading fashion brands over the next 12 months. Overall, the major brands can and should be disclosing how they govern human rights and environmental issues across their teams and supply chain.

Examples of good practice in transparency

In addition to Tesco sharing their CEO's direct email address, several other major brands publish the direct contact details for the people with lead responsibility on social and environmental issues across the company. For example, [C&A publishes the direct email address](#) of their department heads as well as the name and LinkedIn profiles for their

entire [Global Leadership team](#) and managers in their regional teams. H&M now also [publishes](#) the direct email address for the Head of Sustainability as well as several individual members of the team in its [annual report](#).

In terms of board accountability, [ASOS](#) describes how their CEO and board of directors are directly responsible for social and environmental issues and receive reports about performance on these issues monthly.

Very few brands disclose whether their CEO and high-level executives performance is linked to improving human rights and environmental impacts, but Walmart and George at ASDA explain in their [annual report](#) that "since fiscal year 2014, our Executive Officers' cash incentive payments have been subject to achieving adequate progress in implementing enhancements to the company's global compliance program."

"We all need to work together, because there are no jobs on a dead planet; there is no equity without rights to decent work and social protection, no social justice without a shift in governance and ambition, and, ultimately, no peace for the peoples of the world without the guarantees of sustainability."

SHARAN BURROW
GENERAL SECRETARY OF THE INTERNATIONAL
TRADE UNION CONFEDERATION

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;
- Parent company;
- Approximate number of workers;
- Gender breakdown of workers;
- % of migrant or contract workers;
- Trade union or worker committee in the facility;
- List updated in last 6 months.

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 with which brands have a direct relationship 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 subcontractors, wet processing, embroidering, printing, finishing, dye-houses, laundries, and so on? And finally, are brands disclosing their suppliers of raw materials – e.g. primary materials such as fibres, hides, rubber, dyes, metals and so on?

We gave extra points if supplier lists are made available in a computer-readable format such as Excel or CSV and if their lists cover more than 95% of their suppliers.

We also looked to see if brands are tracing at least one raw material supply chain such as leather, cotton or wool.

[BELOW] PHOTOGRAPHY @AMANOYARNS
amanoyarns.com



3. TRACEABILITY

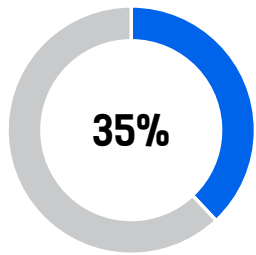
0-10%	11-20%	21-30%	31-40%	41-50%	51-60%	61-70%	71-80%	81-90%	91-100%
S Group - Prisma 7	ALDI Süd 20	John Lewis 27		Levi Strauss & Co 48	ASOS 60	The North Face 65	Patagonia 78		
Joe Fresh 6	Bershka 19	Sainsbury's - Tu Clothing 27		Lindex 48	C&A 56	Timberland 65	Esprit 73		
Abercrombie & Fitch 5	LOFT 19	Speedo 27		Marks & Spencer 48	G-Star RAW 52	Vans 65			
Tod's 5	Massimo Dutti 19	Calvin Klein 26		United Colors of Benetton 48	Adidas 51	Wrangler 65			
ALDO 1	Primark 19	Tommy Hilfiger 26		Reebok 51	Converse 62	Converse 62			
Bottega Veneta 1	Pull & Bear 19	Van Heusen 26		H&M 46	Jordan 62	Jordan 62			
Burberry 1	Stradivarius 19	Clarks 25		New Balance 46	Nike 62	Nike 62			
CELINE 1	Zara 19	Debenhams 25		Banana Republic 45					
COACH 1	Dressmann 14	Hermès 25		Champion 45					
Cole Haan 1	Target 14	New Look 25		Gap 45					
Decathlon 1	George at Asda 13	Very 25		Hanes 45					
Dior 1	Mammut 13	Jack & Jones 24		Old Navy 45					
Fendi 1	Pimkie 12	Russell Athletic 24		Gildan 44					
Fossil 1	Topshop 12	Vero Moda 24		Puma 44					
Gucci 1	Victoria's Secret 12	ASICS 22		Bonprix 42					
Ito-Yokado 1	ALDI Nord 11	Hugo Boss 22		Tchibo 41					
Kate Spade 1	Hudson's Bay 11	Tesco - F&F 22		Lululemon 40					
Lands' End 1	Lidl GB 11	Columbia Sportswear 21							
Louis Vuitton 1	Matalan 11	Mizuno 21							
Marc Jacobs 1	Saks Fifth Avenue 11	Next 21							
Merrell 1		Under Armour 21							
Miu Miu 1		Uniqlo 21							
Moncler 1									
OVS 1									
Prada 1									
Ralph Lauren 1									
s.Oliver 1									
SAINT LAURENT 1									
Superdry 1									
UGG 1									
Aeropostale 0									
Amazon 0									
American Eagle 0									
ANTA 0									
Anthropologie 0									
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Dick's Sporting Goods 0									
Diesel 0									
Dillards 0									
Dolce & Gabbana 0									
DSW 0									
Eddie Bauer 0									
El Corte Inglés 0									
Elie Tahari 0									
Ermenegildo Zegna 0									
Express 0									
Falabella 0									
Famous Footwear 0									
Fanatics 0									
Foot Locker 0									
Forever 21 0									
Furla 0									
GUESS 0									
Heilan Home 0									
Intimissimi 0									
J.Crew 0									
JCPenney 0									
JD Sports 0									
Jessica Simpson 0									
Kik 0									
Kmart - Attention 0									
Kohl's 0									
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Lacoste 0									
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MRP Apparel 0									
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Steve Madden 0									
Takko 0									
Ted Baker 0									
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Tom Ford 0									
Tom Tailor 0									
Tommy Bahama 0									
TOPVALU COLLECTION 0									
Tory Burch 0									
Triumph 0									
Urban Outfitters 0									
Valentino 0									
Versace 0									
Walmart 0									
Youngor 0									
Zalando 0									

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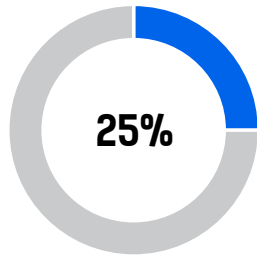
3. TRACEABILITY

FINDINGS

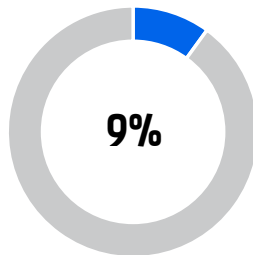
WHO'S PUBLISHING A FACTORY LIST?



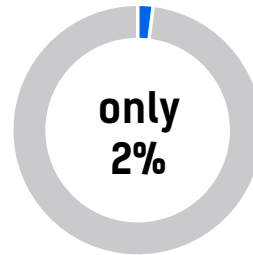
disclose a list of their first-tier manufacturers



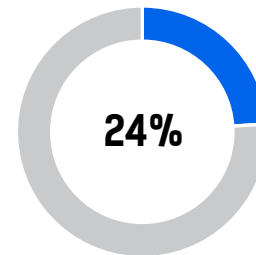
include approximate number of workers at each site



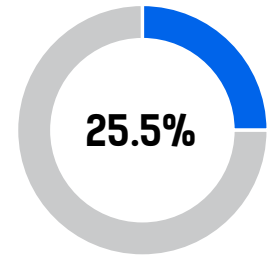
include the gender breakdown of workers at each site



include whether the factory has a trade union or worker committee

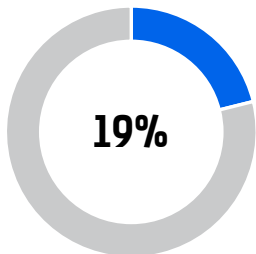


publish at least 95% of their suppliers on this list

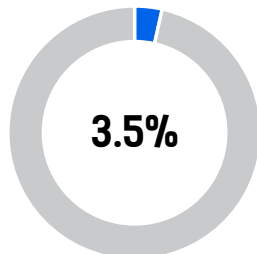


have updated this list within the last 6 months

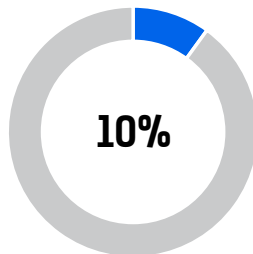
PROCESSING FACILITIES



publish processing facilities beyond the first-tier

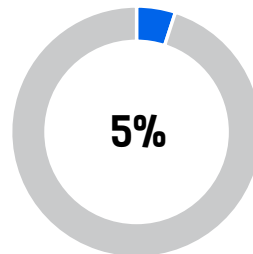


include the gender breakdown of workers in these facilities

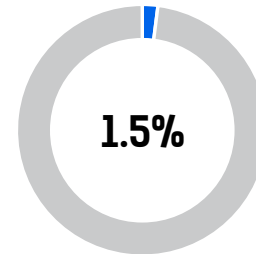


include what percentage of the brand's processing facilities are disclosed

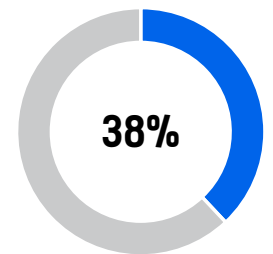
RAW MATERIAL SUPPLIERS



publish some of their raw material suppliers



include the approximate number of workers at each site



of brands are tracing at least one raw material supply chain

3. TRACEABILITY *IMPLICATIONS*

Major fashion brands are making significant progress when it comes to disclosing their suppliers publicly. When we first started conducting the Fashion Transparency Index report in 2016, only 5 of the 40 brands (12.5%) we reviewed were publishing their first-tier suppliers and now 70 brands (35%) out of 200 brands are publishing their first-tier suppliers.

Publishing supplier lists is becoming a new norm

70 brands (35%) are publishing a list of the first-tier manufacturers. Last year 55 brands (37%) of the 150 brands reviewed were publishing their first-tier suppliers. Although the percentage has slightly decreased this year, the number of brands publishing is still notably higher. We hope that a higher number of the brands new to the Index this year will decide to publish their first-tier suppliers in time for the 2020 edition.

In addition, 38 brands (19%) are disclosing their processing facilities, where ginning and spinning, wet

processing, embroidering, printing, finishing, dye-houses, laundering often takes place in 2019. This is an increase from last year where 27 brands (18%) of the 150 brands reviewed were publishing this information.

More brands are disclosing raw material suppliers

And finally, where we have seen the most significant new disclosure in this section in 2019 is brands publishing their raw material suppliers. 10 brands (5%) are disclosing some of the facilities or farms supplying their fibres such as viscose, cotton and wool. This is a significant increase from 2018 where only one brand disclosed this information and no brands shared this information in 2017 or 2016.

Good progress being made but most premium and luxury brands still not disclosing suppliers

The highest scoring brands on traceability this year are Patagonia

and Esprit as well as The North Face, Timberland, Vans, Wrangler (all owned by VF Corp) and Converse, Jordan and Nike (all owned by Nike, Inc.) – each scoring in the 61–80% ranges. Notably, Hugo Boss and Hermès are the only premium and luxury brands publishing a supplier list.

This year the average score in the traceability section is 12% amongst the 200 brands reviewed, an increase from 11% amongst the 150 brands reviewed last year. Encouragingly, if we look at the 150 brands that were reviewed last year and again in 2019, we see a 4% increase in their average score, despite the fact that some of the indicators are more ambitious this year. If we look at the 98 brands reviewed in 2017, 2018 and 2019 then we see an increase in average score by 7% in this section.

A few more things to note

We have designed the methodology to align with the requirements of the [Transparency Pledge](#), a campaign

run by a coalition including Clean Clothes Campaign, Human Rights Watch, IndustriALL Global Union, the International Corporate Accountability Roundtable, the International Labor Rights Forum, the International Trade Union Confederation, the Maquila Solidarity Network, UNI Global Union, and the Worker Rights Consortium, in 2017 and 2018.

We looked for additional data to be shared on brands' supplier lists that go beyond the Transparency Pledge, including gender breakdown and percentage of migrant workers for each facility. This year we were also looking to see if brands' supplier lists include whether each facility has a trade union or worker committee in place. Only 2% of brands include whether each first-tier supplier facility has a trade union or worker committee. 9% of brands include the gender breakdown and just 2% of brands include the percentage of migrant workers for each first-tier facility.

3. TRACEABILITY IMPLICATIONS

We would like to highlight a couple of changes in the methodology in 2019 that may have a small impact on the scoring. In previous years, we were looking for brands to be disclosing their supplier lists in any downloadable format, which could have been PDF, Word document, Excel or CSV file or any other similar format. This year we gave points only to the brands publishing their supplier lists in a computer readable file, Excel or CSV. Why? Because this enables their lists to be easily utilised by open source tools such as the [Open Apparel Registry](#) or the [Clean Clothes Campaign-Wikirate](#) factory search widget. These types of platforms are incredibly helpful for external stakeholders to make efficient use of brands' supplier lists but they require data that can be easily and quickly put into action. 10% of brands are making their first-tier supplier lists available in Excel or CSV.

Why are we asking brands and retailers to disclose their suppliers? Crucially, this sort of transparency can help brands engage and collaborate with trade unions and

other civil society organisations. The disclosure of supplier lists can facilitate the escalation of a labour rights issue by local trade unions or NGOs directly to brands, an issue that a standard factory audit may have failed to identify. So transparency can actually strengthen a company's due diligence efforts and help clarify when unauthorised sub-contracting occurs.

Examples of good practice in transparency

[Adidas and Reebok](#), [John Lewis](#) and [Marks & Spencer](#) are the only brands and retailers in the Index that publish whether each of their first-tier supplier facilities has a trade union and/or worker committee in place.

Marks & Spencer publishes a list of 1,720 factories that employ over 994,000 workers and produce clothing, homewares and food for the retailer. They publish this information in a customer-friendly interactive map and also in a downloadable list. Their list includes the exact number of workers per facility, the gender breakdown and

whether the facility has a trade union and/or workers committee in place.

Marks & Spencer also publishes its [wool suppliers](#) in Australia, New Zealand, South Africa and Uruguay, covering 12 farms that are certified with the [Responsible Down Standard](#) and represent approximately 3,500 tonnes of wool sourced annually.

Nike (covering Converse and Jordan) also publishes their supplier list in an [interactive map](#), including 527 factories that employ over 1 million workers in total and 77 facilities that supply materials. As a best practice example, Nike's supplier list is available to download as a PDF, Excel or JSON files, which means it's usable by a variety of external stakeholders. Nike's list includes total number of workers, the number of line workers (not part of our methodology), percentage of female workers, percentage of migrant workers, factory contact name/email/phone and any known sub-contractors for each factory.

[Adidas and Reebok](#) disclose detailed and individual supplier lists for multiple categories including primary suppliers and sub-contractors; licensees; wet processing facilities and specific supplier lists for key events such as FIFA World Cup championships and the Olympics.

Patagonia's [Footprint Chronicles](#) webpage is where you can see the company's factories, textile mills and even one of their key cotton suppliers. For each supplier, they include a description about the company and a photo of the facility, as well as the date when the supplier first starting working with Patagonia.

[H&M](#) is the only brand reviewed that includes the supplier grading – gold, silver or other – for every single first-tier and processing facility on their list. H&M explains what their supplier gradings mean at the bottom of the webpage. This information has enabled workers rights organisations like [Clean Clothes Campaign](#) to hold the company to account for taking action on living wages.

3. TRACEABILITY *IMPLICATIONS*

Although this sort of disclosure opens H&M up to scrutiny, it has helped shine a light on an urgent issue that cannot be solved by one brand alone.

Although not captured in our current methodology, H&M has also just launched product-level transparency for nearly every product sold in its online stores. For each product online, customers will see the following information:

- Information about the product's material, including how sustainable it is and their specific sustainability goals for it;
- Where each product is produced, down to a country, supplier and factory level;
- Information about how to recycle the garment and why it is important to do so.

In other examples of best practice, [ASOS](#) and [C&A](#) update their supplier list every 2 months, while [H&M](#) updates their supplier list every 3 months and [Target](#) updates their list quarterly.

[RIGHT] PHOTOGRAPHY ©Fairtrade USA
www.fairtradecertified.org



Transparency is the crucial first step on the road to sustainability and building trust with both, stakeholders across the value chain and society at large. Whether at the behest of regulations or growing civil society movements, businesses are realising that ignorance is no longer an acceptable excuse for being directly or indirectly involved in environmental, economic or social exploitation.

With fashion being the one of the most polluting industries in the world, it is encouraging to see that the industry is now systematically engaging with the transparency. Going forward, it is crucial that we not only stay committed but also deepen engagement to minimise exploitation and maximise positive impact across the entire life-cycle of fashion products.

We need to ensure sustainable practices right from the garment factories down to the selection of the raw material. While there have been some incremental improvements in the degree of disclosure and transparency with regards to raw material sourcing, we are still just scratching the surface.

The choice of raw materials has a crucial impact on the overall sustainability of the garment or accessory. We at Fairtrade work across the cotton-based value chain to enable better sustainability practices and the empowerment of the vulnerable communities from the factory workers to the farmers on the field. The devastation caused by cotton production through unsustainable practices and unstable economic models, with high input costs and high risks, is far-reaching.

Cotton consumes **6% of all agricultural chemicals and 16% of all insecticides produced globally**. In India alone, more than **315,000 farmers have committed suicide since 1995**. According to reports, over 70% of these suicides are in the cotton-growing belt of India – that is almost one cotton farmer in the cotton-growing belt every hour. The suicides are as much a result of the unsustainable economics of conventional cotton cultivation as it is of the increased risks faced by the farmers due to climate change, water scarcity and the emergence of super pests and weeds. Additionally, the incidence of child labour and forced labour has often been cited in cotton fields and ginning mills in need of cheap labour during harvest season.

In contrast, **research by Fairtrade Foundation UK** has shown that sustainable fibres like Fairtrade Cotton can have an environmental and social footprint that is up to five times lower than conventional cotton. The research showed that the most significant social advantage for Fairtrade farmers was having more income, whilst Fairtrade cotton performed significantly better on environmental indicators such as water pollutants, water use, GHG emissions and soil pollutants.

Whilst the disclosures throughout this report show that increasingly brands are committing to sourcing sustainable raw materials, it is imperative that brands go further and seek transparency with regards to the origins of this raw material.

This would help to:

1. Improve traceability and increase the credibility and veracity of sourcing data;
2. Provide visibility of sustainability indicators (such as water footprint, chemical use, labour conditions) related to sourcing from specific origins;
3. Enable brands to work with organisations like Fairtrade support farmers growing raw materials and create positive impact on the lives of vulnerable communities;
4. Provide opportunities for pre-competitive and multi-stakeholder collaboration to proactively explore the long-term challenges and growth opportunities at different origins;
5. Provide businesses and consumers an opportunity to connect in a direct and personal manner with the people and communities who grow and produce the raw materials that make their products possible.

In recent years the movement to make fashion more sustainable and transparent has been gaining ground. However, both sustainability and transparency must percolate all the way through the supply chain and engage with all the stakeholders involved, right from the Tier 1 suppliers to the farmers and producers of raw material who are the primary source of the clothes we wear.

VIEWPOINT: *WHY WE NEED MORE TRANSPARENCY AT FIBRE AND FARM LEVEL*



ABHISHEK JANI
CHIEF EXECUTIVE OFFICER
FAIRTRADE INDIA PROJECT

4. KNOW, SHOW & FIX APPROACH

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

We awarded points if brands disclosed:

- How suppliers are assessed against the brand's policies;
- 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 versus semi-announced or unannounced factory visits;
- If brands conduct supplier assessments beyond the first-tier of manufacturing;
- The number of workers interviewed during these supplier assessments.

Know

How do brands go about assessing suppliers to make sure they are meeting their ethical standards and 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 non-compliance, and do they have a process in place for when they want to end their business relationship with a supplier, i.e. how do they ensure exiting the factory doesn't harm workers? Do brands have confidential whistleblowing procedures in place, both for their 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)?



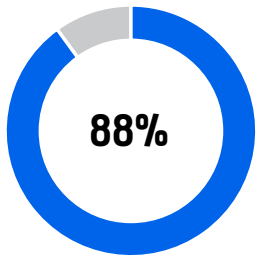
4. KNOW, SHOW & FIX

0-10%	11-20%	21-30%	31-40%	41-50%	51-60%	61-70%	71-80%	81-90%	91-100%
ALDO 10	Hudson's Bay 20	Lululemon 30	C&A 40	H&M 50	Adidas 59				
Calzedonia 10	Next 20	Primark 30	Levi Strauss & Co 40	Puma 50	Reebok 59				
Chico's 10	Russell Athletic 20	Abercrombie & Fitch 29	New Balance 40	Banana Republic 47					
Costco - Kirkland Signature 10	Saks Fifth Avenue 20	Bottega Veneta 29	Patagonia 40	Gap 47					
Decathlon 10	ALDI Nord 19	Gucci 29	Uniqlo 40	Old Navy 47					
Intimissimi 10	Mammut 19	SAINT LAURENT 29	George at Asda 34	Esprit 44					
J.Crew 10	Ralph Lauren 19	Dressmann 27	Marks & Spencer 34	ASOS 43					
JD Sports 10	Victoria's Secret 19	Hugo Boss 27	Tesco - F&F 34	Bershka 41					
Kohl's 10	ASICS 17	United Colors of Benetton 27	Converse 33	Massimo Dutti 41					
Miu Miu 10	COACH 17	Jordan 33	Pull & Bear 41						
Prada 10	Columbia Sportswear 16	Debenhams 26	Nike 33	Stradivarius 41					
River Island 10	Bonprix 14	Burberry 24	The North Face 33	Target 41					
Takko 10	Carrefour - TEX 14	Gildan 23	Timberland 33	Zara 41					
Tezenis 10	Cortefiel 14	G-Star RAW 23	Vans 33						
Topshop 10	Ito-Yokado 14	Walmart 21	Wrangler 33						
American Eagle 9	Lidl GB 14		Calvin Klein 31						
Bloomingdale's 9	Lindex 14		Tchibo 31						
Buckle 9	New Look 14		Van Heusen 31						
Burlington 9	Salvatore Ferragamo 14		Tommy Hilfiger 31						
DSW 9	Under Armour 14								
Fossil 9	Dick's Sporting Goods 13								
GUESS 9	El Corte Inglés 13								
Kik 9	Falabella 13								
Macy's 9	Hermès 13								
Mango 9	Kate Spade 13								
Michael Kors 9	Kmart - Attention 13								
Monoprix 9	Mizuno 13								
Muji 9	Nordstrom 13								
Sainsbury's - Tu Clothing 9	Very 13								
Speedo 9	boohoo 11								
TJ Maxx 9	Champion 11								
UGG 9	Clarks 11								
Amazon 7	Hanes 11								
Diesel 7	JCPenney 11								
Dillard's 7	Lands' End 11								
LOFT 7	Moncler 11								
Marni 7	MRP Apparel 11								
Merrell 7	OVS 11								
Ross Dress for Less 7	S Group - Prisma 11								
Triumph 7	Superdry 11								
Valentino 7	Zalando 11								
Aeropostale 6									
ALDI Süd 6									
Express 6									
Famous Footwear 6									
Jack & Jones 6									
K-Way 6									
Lacoste 6									
Li-Ning 6									
Monsoon 6									
Tom Tailor 6									
TOPVALU COLLECTION 6									
Vero Moda 6									
ANTA 4									
Chanel 4									
Cole Haan 4									
Desigual 4									
Eddie Bauer 4									
Fanatics 4									
Forever 21 4									
LL Bean 4									
Louis Vuitton 4									
Matalan 4									
s.Oliver 4									
Sandro 4									
Skechers 4									
Tod's 4									
Brunello Cucinelli 3									
Carolina Herrera 3									
CELINE 3									
Claire's 3									
Dior 3									
Fendi 3									
Foot Locker 3									
Joe Fresh 3									
John Lewis 3									
Marc Jacobs 3									
Neiman Marcus 3									
New York & Company 3									
Nine West 3									
Sports Direct 3									
Steve Madden 3									
Tommy Bahama 3									
Anthropologie 1									
Armani 1									
BCBGMAXAZRIA 1									
Diane Von Furstenberg 1									
Ermengildo Zegna 1									
REVOLVE 1									
Ted Baker 1									
Tory Burch 1									
Urban Outfitters 1									
Versace 1									
Barneys New York 0									
Beanpole 0									
Brooks Brothers 0									
CAROLL 0									
Dolce & Gabbana 0									
Elie Tahari 0									
Furla 0									
Heilan Home 0									
Jessica Simpson 0									
Liverpool 0									
Longchamp 0									
Max Mara 0									
Metersbonwe 0									
Mexx 0									
New Yorker 0									
Pimkie 0									
Tom Ford 0									
Youngor 0									

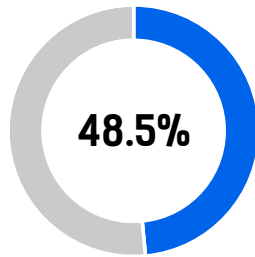
* Brands ranked in numerical order by score out of 250, but shown as the nearest full percentage. Where brands have the same percentage score, they are listed in alphabetical order and grouped with others from same parent company

4. KNOW, SHOW & FIX *FINDINGS*

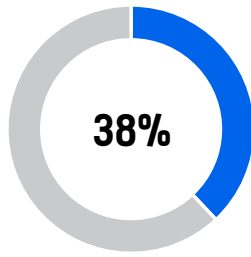
KNOW: ASSESSING SUPPLIERS



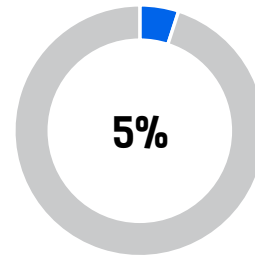
disclose their process for assessing conditions in supplier facilities



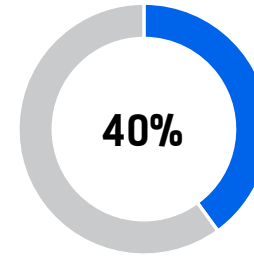
explain how frequently supplier assessments are conducted



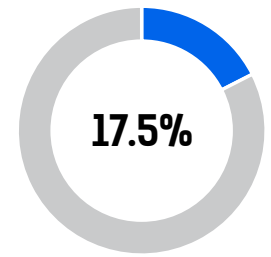
report conducting supplier assessments beyond the first-tier



disclose the number of workers interviewed during supplier assessments



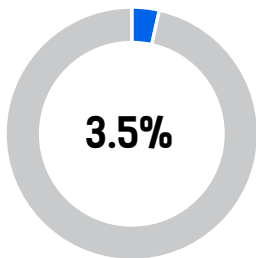
publish summarised findings of their assessments for first-tier suppliers



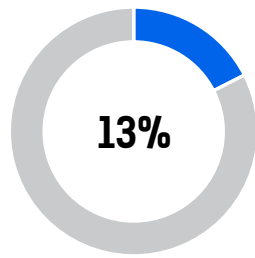
publish summarised findings of their assessments beyond first-tier suppliers

SHOW: DISCLOSING OUTCOMES

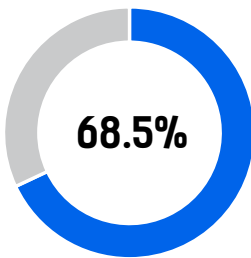
FIX: ADDRESSING PROBLEMS



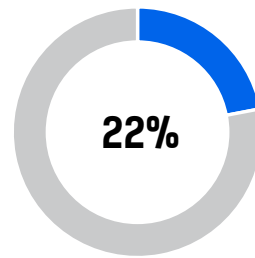
publish summarised findings of their assessments at raw material level



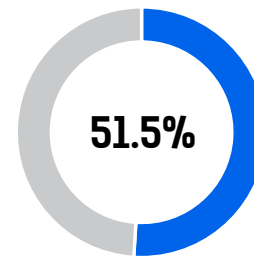
publish assessments findings for named first-tier suppliers, covering multiple topics



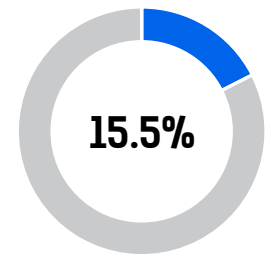
disclose the process for remediation when violations are found in a supplier facility



disclose the number of supplier facilities with remediation plans in place and their status



publish a confidential whistleblowing procedure for workers in the supply chain



disclose data about the number of reported violations or grievances filed by workers in the supply chain

4. KNOW, SHOW & FIX IMPLICATIONS

Know: Assessing Suppliers

88% of brands are disclosing their process for assessing their supplier facilities, typically done through specialised social audits. This is an increase from last year where 79% of brands were publishing this information.

61.5% of brands also disclose their criteria for taking on new suppliers, ensuring the facility meets their policies and standards before production starts. 48.5% of brands explain how frequently they conduct supplier assessments, typically this happens annually but sometimes brands disclose a policy of more or less frequent audits.

It should be noted that we made some changes to wording of the methodology in this section to make it more ambitious and encourage further progress. For example, last year 54% of 150 brands disclosed whether their facility assessments were unannounced, semi-announced, announced or some combination of these. This year, we looked to see if brands disclosed the actual number or percentage of facility assessments

that were done unannounced, semi-announced or announced and only 17% of the 200 brands reviewed shared this data. We wanted to see if we could better understand the norms around how facility assessments are being done. However, since not that many brands disclose this data, it's difficult to know if audits are often carried out unannounced, semi-announced or announced.

38% of brands explain how their facility assessments go beyond first-tier manufacturing and also include processing facilities, sub-contractors and sometimes also raw material suppliers.

Show: Not much detailed information published about the outcomes of supplier assessments

40% of brands share generalised, aggregated findings from their supplier assessments at the first-tier of manufacturing, while 17.5% of brands share findings from supplier assessments that go beyond the first-tier, and 3.5% of brands share findings of assessments done at raw material level. This is a similar

level of disclosure of supplier assessment findings to last year.

21.5% of brands are disclosing audit findings for specific supplier facilities on a single issue, which typically covers building and fire safety inspections. Brands and retailers who are members of the [Bangladesh Accord](#) or [Alliance for Bangladesh Worker Safety](#), who are including a link to these initiatives on their website, and also publishing a list of their suppliers were awarded these points. This is because we are able to cross-reference the brand's list of suppliers with the inspection reports on the Bangladesh Accord or Alliance for Bangladesh Worker Safety and understand how specific factories are performing..

However, the Alliance ceased operating in December 2018 and the Government of Bangladesh is deciding whether to shut down the Accord's extended transitional operations going forward. Without the work of the Bangladesh Accord carrying on, it will mean losing an important transparent window into some of the working conditions and improvements being made in factories in Bangladesh. This means that brands currently

receiving these points for disclosure of audit findings will be likely to lose these points in next year's edition.

13% of brands are disclosing audit findings for specific first-tier supplier facilities covering multiple working conditions topics such as health and safety, discrimination, working hours and wages, via the [ILO's Better Work](#) transparency portal. The same logic applies to the brands and retailers who are members of the Better Work programme; including a link to these initiatives on their website, and also publishing a list of their suppliers meant they were awarded these points. This is because we are able to cross-reference the brand's list of suppliers with compliance data for specific factories on the Better Work portal. Currently information is available from factories in Cambodia, Haiti, Indonesia, Jordan, Nicaragua and Vietnam. Over the coming months factory information for Bangladesh will be made public as well.

No brands are yet sharing full audit findings for individual suppliers. Considering companies like Inditex (the parent company of Zara, Bershka, Massimo Dutti, Pull & Bear and Stradivarius) conduct over 10,000 audits

every year, we are not expecting this level of disclosure to happen anytime soon. There are also sensitivities to be considered when it comes to publishing full inspection reports, so the conversation on granular level audit disclosure continues to be discussed at industry level.

The highest scoring brands in the Know, Show & Fix section this year are Adidas and Reebok, H&M, Puma and Gap, Banana Republic and Old Navy, which are owned by Gap Inc.

Fix: Over half of brands publishing confidential grievance mechanism for workers

Once supplier assessments have been completed and when non-compliances are found in supplier facilities, we also looked to see if brands are disclosing their process for fixing problems and supporting their suppliers to make improvements. This is usually in the form of Corrective Action Plans (CAPs) that might include stop-work notices, warning letters, supplementary training, policy revisions and further inspections. 68.5% of brands disclose their factory remediation process, 22% share the percentage or number of supplier facilities with remediation plans in place and the status of improvements and 18.5% disclose

the remediation status of individual factories through the Bangladesh Accord and Alliance websites.

Grievance channels make it possible for problems to be identified and addressed as well as remediated directly and efficiently between the parties involved. 51.5% of brands publicly provide a confidential channel for workers in the supply chain to report grievances or non-compliance with brands' policies. This is an increase from last year where 49% out of 150 brands published a grievance mechanism for workers in the supply chain. 15.5% of brands also share data about the number of reported violations or grievances filed by workers in the supply chain and whether they have been addressed and resolved.

Overall, the average scores in this section of the methodology have not changed much amongst the brands that have been reviewed year-on-year. The average score amongst the 150 brands reviewed in 2018 and again in 2019 was unchanged at 17% and amongst the 98 brands reviewed in 2017, 2018 and 2019 there has been only a 1% increase in disclosure in this section.

Examples of good practice in transparency

[G-Star](#) gives quite a lot of detail about their supplier assessment and monitoring process, including disclosing that audits are conducted at least annually with follow-up assessments happening every 2 to 3 months where required and a clear description of how new supplier relationships are handled.

C&A offers some interesting and relatively detailed insights into the [outcomes of its suppliers assessments](#) and performance of its global suppliers according to an A through E grading programme.

In its lengthy [2018 Reference Document](#) (pages 109–113), Kering Group (who owns Gucci, Bottega Veneta and Saint Laurent in this Index) explains in great detail how they implement social audits in their supply chains from factory through to raw materials suppliers. They also share data on the findings of these audits including a breakdown of "the top 5 anomalies:" health and safety, pay and working conditions, environment, discrimination and other.

In [Adidas and Reebok's annual report](#) (page 97), they also disclose detailed but aggregated data on the top 10

labour non-compliances found during their supplier assessments: wages, working hours and lack of standardised record keeping.

Burberry talks about running [confidential, NGO-run hotlines](#) for workers in their supply chain where local labour laws are weak, absent or poorly enforced. Workers can contact the hotlines using phone, Skype or QQ (free instant messaging). Hotlines are used to communicate grievances, as a counselling line, and/ or to seek advice on labour rights. The contracted hotline service provider directly trains workers in factories in how to use the hotline.

Again, these are just a few examples worth checking out, but there are plenty more examples we could share of both detailed and weak levels of disclosure in this section. However, we hope this gives you a useful starting point for further exploration.

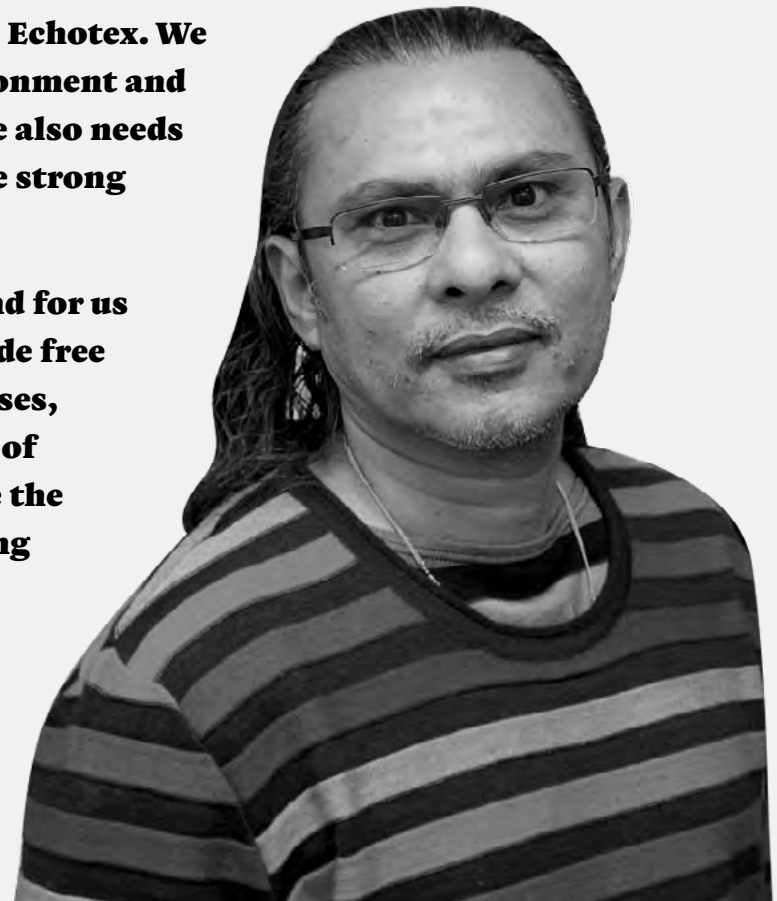
"Transparency means different things to different people, as does sustainability, but we believe that it is fundamental to building any kind of partnership with our customers and our team members who form the backbone of our business.

It is easier to be transparent if you truly believe in it and what your initial vision or objectives are. If one wants to be compliant, then you follow orders and requirements, meet your obligations as it were. We have done things differently from day one with our manufacturing unit Echotex. We did things that we believed in, especially to do with the environment and workers' welfare, wellbeing and benefits. To achieve this, one also needs serious business partners, brands and retailers that you forge strong partnerships with.

Transparency has always been a key part Echotex's journey and for us improving lives comes before profits. At our facility we provide free meals, paid maternity and paternity leave, productivity bonuses, provident funds, free comprehensive health insurance for all of our workers and many other benefits. We are also proud to be the largest LEED Platinum Certified unit in Bangladesh employing over 11,000 people.

However, as a final note, to deliver well on all fronts, at cost and with the current price deflationary pressure, things are getting difficult. There is a pause for thought, and nothing long term can be achieved without transparency."

SHAFIQ HASSAN
MANAGING DIRECTOR
ECHOTEX



5. SPOTLIGHT ISSUES: *APPROACH*

Each year, we explore a few key issues in deeper detail. Our team has chosen 4 out of the 17 Sustainable Development Goals that are particularly relevant and urgent for the global fashion industry to achieve by 2030 as this year's Spotlight Issues. These are:

SDG 5: Gender Equality

How major brands are tackling gender-based discrimination and violence in supply chains. How brands are supporting equal pay, gender equality and female empowerment in the company and in the supply chain.

SDG 8: Decent Work & Economic Growth

How major brands are ensuring that supply chain workers are able to unionise and collectively bargain for their rights. How brands are supporting the payment of living wages to workers in the supply chain, and how its purchasing practices are enabling good working conditions and the payment of living wages to workers in the supply chain.

SDG 12: Responsible Production & Consumption

What major brands are doing to increase their use of sustainable materials and decrease the use of virgin plastics used to produce synthetic fibres such as polyester and acrylic. What major brands are doing to tackle textile and clothing waste and the investments they are making towards moving to a circular business model.

SDG 13: Climate Action

How much data major brands publish about their carbon emissions, use of renewable energy and water footprint. Whether brands are linking environmental impacts to the business bottom line.

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5. SPOTLIGHT ISSUES

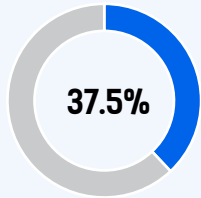
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Very 9	Salvatore Ferragamo 18	Topshop 29	Tchibo 38	Nike 44	Stradivarius 59				
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Joe Fresh 3	JD Sports 12								
K-Way 3	Kik 12								
Li-Ning 3	Nordstrom 12								
Longchamp 3	S Group - Prisma 12								
Macy's 3	Sandro 12								
Marni 3	TOPVALU COLLECTION 12								
Matalan 3									
Merrell 3									
River Island 3									
s.Oliver 3									
Skechers 3									
Takko 3									
Valentino 3									
Aeropostale 0									
Anthropologie 0									
Armani 0									
Barneys New York 0									
BCBGMAXAZRIA 0									
Beanpole 0									
Brooks Brothers 0									
Buckle 0									
Burlington 0									
Calzedonia 0									
CAROLL 0									
Chico's 0									
Claire's 0									
Cole Haan 0									
Desigual 0									
Diane Von Furstenberg 0									
Dick's Sporting Goods 0									
Dolce & Gabbana 0									
Eddie Bauer 0									
Elie Tahari 0									
Ermenegildo Zegna 0									
Express 0									
Famous Footwear 0									
Foot Locker 0									
Forever 21 0									
Furla 0									
Heilan Home 0									
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Jessica Simpson 0									
Liverpool 0									
LL Bean 0									
Max Mara 0									
Metersbonwe 0									
Mexx 0									
Michael Kors 0									
Neiman Marcus 0									
New York & Company 0									
New Yorker 0									
Nine West 0									
Pimkie 0									
REVOLVE 0									
Ross Dress for Less 0									
Russell Athletic 0									
Steve Madden 0									
Tezenis 0									
Tom Ford 0									
Tommy Bahama 0									
Tory Burch 0									
Triumph 0									
Urban Outfitters 0									
Versace 0									
Youngor 0									

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

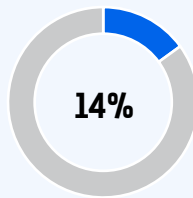
5. SPOTLIGHT ISSUES

FINDINGS

SDG 5: GENDER EQUALITY



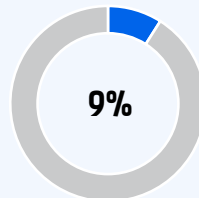
disclose capacity building projects focused on gender equality in the supply chain



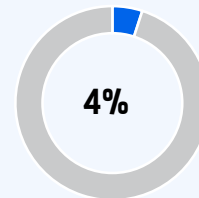
publish best practice guidance in the supplier code of conduct on issues facing female workers in the supply chain

SDG 8: DECENT WORK

UNIONISATION AND COLLECTIVE BARGAINING

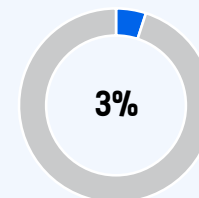


disclose the number of workers in the supply chain covered by collective bargaining agreements

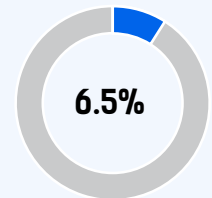


disclose the number of supplier facilities with independent democratically elected trade unions

COMPANY PURCHASING PRACTICES

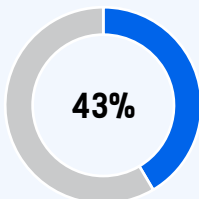


disclose a method for isolating the labour cost in price negotiations with suppliers

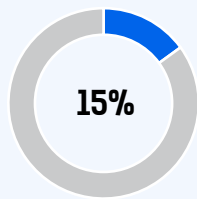


publish a policy to pay suppliers within a maximum of 60 days

SDG 12: RESPONSIBLE CONSUMPTION & PRODUCTION

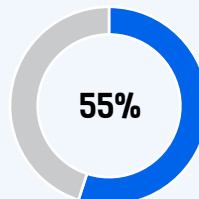


publish a sustainable materials strategy or roadmap

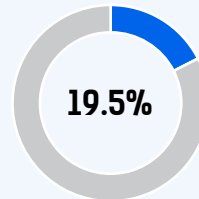


publish measurable time bound targets for the reduction of the use of virgin plastics

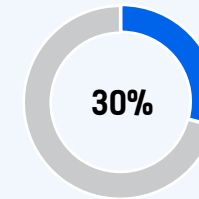
SDG 13: CLIMATE ACTION



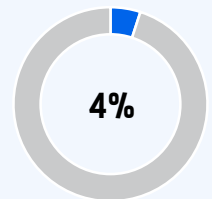
publish their annual carbon footprint or GHG emissions in owned facilities (e.g. head office or retail stores)



publish their annual carbon footprint or GHG emissions in the supply chain



publish the annual water footprint in the company's owned facilities



publish the annual water footprint at fibre production or raw material level

5. SPOTLIGHT ISSUES *IMPLICATIONS*

The highest scoring brands in the Spotlight Issues section this year are H&M, Adidas and Reebok, Patagonia as well as Bershka, Massimo Dutti, Pull&Bear, Stradivarius and Zara (all owned by Inditex), ASOS and C&A, respectively.

SDG5: Gender Equality

This SDG aims to end all forms of discrimination and violence against all women and girls everywhere by 2030.

Around 70–80% of the world’s garment workers are women and the fashion industry across many of its functions, from design to marketing, sales and creative, employs a huge number of women.

Recent research from [CARE International](#) shows that sexual harassment is a regular occurrence in fashion’s supply chains – nearly one in three female garment factory workers reported experiencing sexually harassing behaviours in the workplace over a 12-month period.

Our own research during the [Garment Worker Diaries](#) project in 2017,

conducted in collaboration with Microfinance Opportunities, found that female workers in Bangladesh, Cambodia and India are often exposed to verbal abuse from their supervisors and rely on income from their husbands or other household earners to meet their financial obligations.

Yet major brands don’t seem to be doing all that much to address gender inequality and empower women across the fashion value chain.

Only just over one third of brands support women’s empowerment projects for garment workers

We found that only 37.5% of brands disclose that they are involved in capacity building projects in the supply chain focused on gender equality or female empowerment. This actually represents a smaller proportion of brands sharing this information compared to last year where 40% of 150 brands reported that they were part of initiatives focused on empowering female garment workers. [BSR’s HERproject](#) is one of the programmes that many brands report participating in, which strives to empower low-income

women working in global supply chains through interventions on health, financial inclusion, confidence and well-being. Some brands also work with CARE International on training that helps prevent sexual harassment in the workplace as well as leadership, communication and negotiation skills.

Little is known about how brands are addressing gender-based labour violations in garment factories

In fact, only 14% of brands publish best practice guidance on issues facing female workers in the supply chain in their supplier codes of conduct, a small increase from 13% of 150 brands reviewed in 2018. Dismally, only 3 brands (1.5%) publish data on the prevalence of gender-based labour violations in the supplier facilities, compared to 5% of 150 brands in 2018. This sort of data would be hugely useful for NGOs and trade unions that are working to eliminate sexual harassment in garment factories and improve conditions for women working in fashion’s supply chains. This information would also show that brands are making an effort to track

performance and progress on these crucial issues year-on-year.

Some progress made on disclosing equal pay policies and the gender pay gap by major fashion brands

When it comes to brands’ own employees, our findings are a little more positive. 55% of brands in 2019 compared to 47% of brands in 2018 publish the annual male/female ratio or percentage of women in executive and management positions in the company.

When it comes to related policies, which were reviewed as part of section one in the methodology, 63% of brands in 2019 compared to 39% of brands in 2018 disclose policies on equal pay at company level – quite significant and positive progress since last year. However, our research suggests that brands might be more focused on policies than on the actions or outcomes of these policies.

Meanwhile, 68% of brands in 2019 compared to 41% of brands in 2018 have supplier policies on equal pay – indicating more positive progress since

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IMPLICATIONS

last year. However, only 30% of brands disclose how their equal pay policies are put into practice.

30.5% of brands in 2019 compared to 26% of brands in 2018 disclose policies on maternity rights and parental leave at company level, whilst 22% of brands have supplier policies on maternity rights and parental leave.

Though some progress has been made, still only 33.5% of brands in 2019 publish the annual gender pay gap within the company, compared to 14% of brands in 2018.

Only 29.5% of brands publish an overall strategy, including measurable quantitative goals, related to women's empowerment within their business, but this is a notable increase from 25% of 150 brands reviewed last year.

Examples of good practice in transparency

Gap inc. (who also own Banana Republic and Old Navy in this Index) talks about its innovative [Personal Advancement & Career Enhancement \(P.A.C.E.\)](#) programme, which works to give women garment workers foundational life skills, technical training and support that helps them advance in the workplace and in their personal lives. By early 2018, over 122,000 women in 15 countries had participated in the programme and their goal is to reach 1 million women and girls by the end of 2022.

[Adidas/Reebok](#) and [Mammut](#) (page 9 of their report) are the only brands to publish data on the prevalence of gender-based labour violations in their supplier facilities.

A selection of comprehensive gender pay gap reports to check out are those from [ASOS](#), [Burberry](#), [John Lewis](#), [Marks & Spencer](#), [Sainsbury's](#) and [Tesco](#), which include detailed data

breakdowns, actions taken to address the gender pay gap and commitments to improve the gender pay gap in the future.

SDG 8: Decent Work

Goal 8.5 of the Sustainable Development Goals sets a target to achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value, by 2030.

Freedom of association, the right to unionise and collective bargaining

Freedom of association, the right to unionise and collective bargaining are fundamental human rights that are essential for achieving SDG 8. This is why we looked at what the leading brands are disclosing about their efforts to support and monitor these issues.

When it comes to policies, major brands are making clear that freedom

of association, the right to unionise and collective bargaining is a priority. 77% of brands publish a policy on freedom of association, the right to organise and collective bargaining in their Supplier Code of Conduct, up from 73% of 150 brands in 2018. 34.5% of brands publish a policy on this same issue for the company's own workforce, up from 27% of 150 brands in 2018.

However, when it comes to putting those policies into practice, the evidence paints a different picture. We found that only 40.5% of brands disclose how they go about putting their freedom of association, right to unionise and collective bargaining policies into action either at own employee or supplier level. We also found that only 4% of brands disclose the number or percentage of its supplier facilities that have independent, democratically elected trade unions, an increase from 3% of 150 brands reviewed in 2018. 18 brands (9%) publish the number or percentage of supply chain workers that are covered by collective bargaining

5. SPOTLIGHT ISSUES *IMPLICATIONS*

agreements. And finally, just 4 brands (2%) include whether each factory on its first-tier supplier list has a trade union or worker committee.

Examples of good practice in transparency

Six companies in this Index have signed [Global Framework Agreements](#) with IndustriALL Global Union – ASOS, Esprit, Inditex (who owns the brands Bershka, Massimo Dutti, Pull&Bear, Stradivarius and Zara), H&M, Mizuno and Tchibo. Global Framework Agreements (GFAs) are negotiated on a global level between trade unions and a multinational company. GFAs provide mechanisms and standards to empower trade unions to safeguard workers' rights across a company's global supply chain.

However, many of the luxury brands – such as Chanel, Dior, Hermès, Louis Vuitton, Salvatore Ferragamo, Prada and Miu Miu, and Gucci, Bottega Veneta and Saint Laurent (Kering Group) produce exclusively or predominantly in Italy, France and Spain where national and industry-wide collective bargaining agreements are in place, Works Councils are active and national legislation on

these issues is strong. This doesn't always guarantee good working conditions but it certainly provides much stronger protections than in other production countries.

Meanwhile, Adidas and Reebok, Gildan Activewear, H&M, Ito Yokado, John Lewis, Lululemon and Marks & Spencer are the only big brands and retailers to disclose how many of their supplier facilities or supply chain workers have independent, democratically elected trade unions.

Living wages

The topic of living wages is a fraught, complex and hugely important issue for workers in the supply chain. Most of the world's garment workers are not paid living wages and find it difficult if not impossible to afford life's basic necessities on the wages they earn from garment and textile production. This is why it's important to put the spotlight on what brands are disclosing about their efforts to address this issue.

We found that only 18.5% of brands disclose the company's approach to achieving the payment of living wages to workers in the supply chain. This is

typically by being part of a multi-stakeholder initiative such as [ACT membership](#), Fair Wear Foundation's [Fair Wage Ladder](#), Fair Labor Association [Fair Wage Strategy](#), [Fairtrade Textile Standard](#) or by calculating and benchmarking wages using the [Anker methodology](#) or [Asia Floor Wage](#).

Only 16.5% of brands disclose how the

[BELOW] PHOTOGRAPHY Landfeel
shoplandfeel.com

company is implementing its approach to achieving the payment of living wages to workers in the supply chain – such as through regular collective bargaining, facilitating social dialogue between factory managers/owners and workers, training on wage negotiations for workers in the supply chain, helping to move suppliers and their workers to an



5. SPOTLIGHT ISSUES *IMPLICATIONS*

electronic payroll, mechanisms to detect non-payment, under-payment or late payment of wages, and/or offering a price increase for the next several years in exchange for a wage increase.

Meanwhile, only 8 brands (4%) report on annual progress towards paying living wages to workers in the supply chain, and just 2 brands (1%) share the percentages above the minimum wage workers are paid in the brand's supply chain. To be honest, we didn't expect any brands to disclose minimum wage data, so it's encouraging to see even just two brands publishing this.

The only two brands who share data on the percentage above the minimum wage workers are paid in the brand's supply chain are [H&M](#) and [Puma](#), page 17 of their annual report. While this is useful public disclosure, of course it doesn't mean that the workers in their supply chains are being paid a living wage.

Clearly, major brands and retailers are not moving fast enough on this critical issue, one that could have such a profound impact on workers' lives.

Company purchasing practices

The [Ethical Trading Initiative](#) explains the context of this issue well – suppliers have a key role and responsibility for providing good working conditions for the people they employ, but their efforts can be undermined by the buying practices of their customers, those that are often the same brands and retailers pushing them to comply with their social and environmental policies. Several factory owners in Bangladesh have reported to us recently that they are receiving 3–5% cheaper prices for their orders from brands every year and claim this is one of the main reasons they can't increase wages.

We can hardly expect things to improve when pressure from brands and retailers to reduce prices season after season makes it difficult for suppliers to pay workers a living wage. And other company practices related to design, order planning, invoicing and shipping can sometimes contribute to suppliers making their employees work excessive overtime or they might call in casual labourers and sub-contract without the brand's authorisation.

This is why we wanted to take a look at what major brands are disclosing about their purchasing practices and how their buying strategies are contributing to the decent work agenda. These were entirely new indicators in the methodology this year.

Our findings on what brands are disclosing about their purchasing practices was surprising and disappointing.

Only 6 brands (3%) disclose a method for isolating and calculating labour costs in the price negotiation process (including wages, overtime, social charges, sick leave, vacation and other forms of leave as well as the cost of indirect labour). What does this mean? Basically, we were looking to see if brands talk about how they determine if the price they pay to suppliers allows for the payment of a living wage rate. The point being that the prices they're paying to suppliers should be high enough to enable the payment of a living wage to workers.

On brands' terms of supplier payments

Only 13 brands (6.5%) of disclose a policy to pay suppliers within a maximum of 60 days (e.g. via [United Kingdom Prompt Payment Code](#) commitments). Only 4 brands (2%) publish the percentage of supplier payments made on time and according to agreed terms – an issue we repeatedly have been told is a pain point for suppliers, one that can impact their ability to provide regular and fairly paid employment to workers.

[Speedo](#) (owned by Pentland) is the only brand to disclose (on page 17 of their Modern Slavery Act statement) the percentage of suppliers that receive supply chain financing, credit notes or part payments before orders are completed or shipped – something that helps suppliers with cash flow when the margins are so tight. Zero brands disclose the percentage of orders where penalties were imposed on suppliers and the reasons why (e.g. early or late delivery, damages, non-conformities, etc.) – another tricky issue that we have been told by

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IMPLICATIONS

sourcing experts happens frequently and sometimes systemically for a variety of reasons.

Some brands are sharing a process for gathering supplier feedback on their purchasing practices

On a slightly more positive note, 18 brands (9%) disclose a formal process for gathering supplier feedback on the company's purchasing practices (e.g. by being signed up to the Better Buying platform, holding regular Supplier Summits, conducting internal suppliers surveys of brands' purchasing practices or via ACT membership activities.) But only 6 brands (3%) actually disclose any information about what that supplier feedback entails. If you are interested in this issue, we recommend checking out [Patagonia](#) (page 15) and [Tesco](#) to find out what suppliers are saying about their purchasing practices.

The key take-away is that brands are disclosing far too little about their purchasing practices. Given that leading brands are expecting trust and transparency from suppliers, they too should share more information publicly about their own commitments and

efforts to be responsible business partners.

SDG 12: Sustainable Consumption and Production

Sustainable consumption and production is all about "doing more and better with less. This SDG aims to achieve a number of targets by 2030, including but not limited to:

- Substantially reduce waste generation through prevention, reduction, recycling and reuse
- Encourage companies, especially large and transnational companies, to adopt sustainable practices and to integrate sustainability information into their reporting cycle
- Achieve the sustainable management and efficient use of natural resources
- Ensure that people everywhere have the relevant information and awareness for sustainable development and lifestyles in harmony with nature

This is why we wanted to take a look at what major brands disclose about their

use of sustainable materials, what they're doing to make clothes last longer, how they are tackling textile and clothing waste and how they are investing in circular solutions.

Strategies on using sustainable materials

We found that 43% of brands are publishing a sustainable materials strategy or roadmap. 29% of brands are disclosing what percentage of annual product volume (incl. clothing, footwear, accessories) is made using sustainable materials – such as organic/Fairtrade/ Better Cotton, recycled/repurposed fabric, chrome-free/vegetable-tanned leather and/or sustainably sourced forest based fabrics.

Only 30 brands (15%) publish measurable, time-bound targets for the reduction of the use of virgin plastics. We found this low figure surprising considering how serious of an issue the use of plastic has become globally.

Tackling textile waste

26.5% of brands describe what their strategy is to reduce pre-consumer surplus/waste (e.g. off-cuts, unsold and

defective stock, production samples), up from 11% of 150 brands reviewed last year – which is encouraging progress. Meanwhile, 23.5% of brands offer permanent, year-round take-back schemes/in-store recycling for clothing and textiles.

Only 20 brands (10%) offer repair services to their customers in order to help extend the life of their products, and these brands tend mostly to be luxury brands offering this repair for shoes, handbags or expensive items. This is a notable increase from last year where only 6% of brands were offering repairs.

And finally, we found that 52 brands (26%) are disclosing how they invest in circular solutions that go beyond reuse, recycling and downcycling.

When we consider that 80% of all clothing produced ends up in incinerators or landfill and only 20% is recycled, according to the 2017 Pulse of the Fashion Industry report, we wonder why major brands are not revealing more about their efforts to reduce textile waste and move towards circular systems.

5. SPOTLIGHT ISSUES *IMPLICATIONS*

One final issue we still find highly alarming, which isn't necessarily measured by this methodology, is the huge volume of products some leading brands are putting onto the market each year. For example, Inditex (who owns Bershka, Massimo Dutti, Pull&Bear, Stradivarius and Zara) reports putting over 1.5 billion products on the market in 2017.

This reflects that while we are seeing increasing efforts to minimise impacts at a product level, if the amount of new clothing produced increases at its current trajectory year-on-year, the industry will continue to generate negative environment impacts in an unsustainable way.

Examples of good practice in transparency

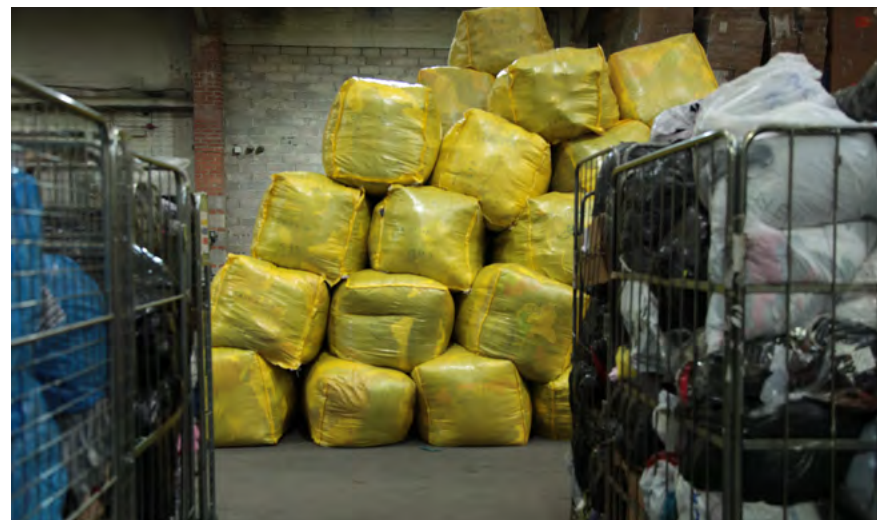
Esprit has a clear and comprehensive strategy called “*design smart*” (pages 17 to 26) that explains where they want to be on sourcing more sustainable materials by 2021 and how they're doing it. *ASOS* is another brand with a detailed sustainable sourcing programme in place setting out how it plans to achieve its 2020 circular fashion system commitment.

Impressively, as of March 2019 [Marks & Spencer](#) is now sourcing 100% of the cotton used for its clothing from sustainable sources. This amounts to around 45,000 metric tonnes of more sustainable cotton lint. The majority of this was met by sourcing Better Cotton Initiative certified lint, with the remainder made up of organic, recycled or Fairtrade cotton. By 2025, they aim to have increased the proportion of Fairtrade, organic and recycled sources of cotton to 25% of volume.

Kering Group (who owns Gucci, Bottega Veneta and Saint Laurent in this Index) seems to be one of the companies doing the most when it comes to sustainable materials, which you can read about – if you are interested and have ample time – in their [2018 Reference Document](#) (pages 124–131) and in their very comprehensive [guidelines for raw material suppliers](#), covering everything from cotton and silk to paper, wood, metals and gemstones.

[Patagonia](#) is the other leading brand appearing to do a lot in this area. You can read extensive information about all the different sustainable fibres and

[BELOW] PHOTOGRAPHY Birdsong
birdsong.london



fabrics they are using and the technologies they use to certify and treat fabrics. Patagonia's [Worn Wear initiative](#) is also an example of helping consumers to repair, reuse and extend the life of their garments.

SDG 13: Climate Action

SDG 13 is focused on integrating climate change measures into policies, strategies and planning. The recently launched [UN Fashion Industry Charter for Climate Action](#) contains the vision to achieve net-zero emissions by 2050. It includes a

target of 30% greenhouse gas emission reductions by 2030 and a commitment to analyse and set a decarbonisation pathway for the fashion industry drawing on methodologies from the Science-Based Targets Initiative. Fashion Revolution is a signatory and official Supporting Organisation to the Charter, and we will be working with the other signatories and UN Climate Change to promote broad climate action within the fashion industry.

That's why this year we wanted to put the spotlight on the information that

5. SPOTLIGHT ISSUES *IMPLICATIONS*

Leading fashion brands are sharing about their climate impacts, so we looked to see if brands are publishing their carbon and water footprints as well as their use of renewable energy.

Carbon footprint

We found that 55% of brands are publishing the annual carbon footprint or greenhouse gas emissions in the company's owned and operated facilities, but only 19.5% of brands are publishing the carbon footprint in their supply chain, where over 50% of the industry's emissions occur, according to Quantis.

Renewable energy use

35% of brands are disclosing the percentage of renewable energy they're using in the company's owned and operated facilities but only 6% share the percentage of renewable energy use in the supply chain.

We noticed that many brands are actually disclosing data on reductions in the amount of energy used in their operations and supply chains, but this was not measured by our methodology this year.

Water footprint

30.5% of brands are publishing the annual water footprint in company's owned and operated facilities, 14% of brands share this data at manufacturing and/or processing facility level and just 4% of brands share water footprint data at fibre production and/or raw material level.

Integrating environmental impacts into the bottom line

Furthermore, just 7 brands (3.5% out of 200) map environmental impacts directly to their financial statements. [Kering Group's Environmental Profit & Loss report](#) is still the best example of how this can be done.

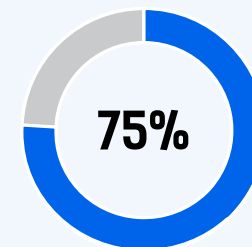
Perhaps as the work of the [UN's Fashion Industry Charter for Climate Action](#) progresses, we will see more brands start to disclose their carbon footprint, use of renewable energy and other environmental footprints and impacts.

Examples of good practice in transparency

[Adidas and Reebok's Green Company Performance Analysis report](#) is impressive. It covers 64 corporate sites, tracking performance in energy, carbon emissions, water consumption and waste reductions. They even disclose detailed breakdowns of energy usage, carbon emissions and water usage per facility.

[Esprit](#) (pages 55 to 61) offers an interesting detailed breakdown of its carbon footprint from its office, shipments and business travel. [Burberry](#) gives a detailed breakdown of the company's carbon emissions, energy consumption coming from renewable sources and water used in its UK offices and manufacturing sites. [C&A](#) provides comprehensive data on its year-on-year water footprint looking at green (rainfall used to grow plants), grey (pollution) and blue water (fresh or ground sources used to grow crops). [C&A](#) also details its water footprint across the product lifecycle from design through to consumer use.

Most impressive of all is [Kering Group's Environmental Profit & Loss report](#) (who owns Gucci, Bottega Veneta and Saint Laurent), which extensively measures the company's contribution to air pollution, land use, waste, water consumption and water pollution from raw material production to its stores, warehouses and offices.



75%
of consumers said it is important for brands to protect the environment at every stage of making their products.

Fashion Revolution
Consumer Survey 2018

VIEWPOINT:

WHY TRANSPARENCY IS KEY TO TRANSFORMING THE FASHION INDUSTRY



JENNY HOLDCROFT
ASSISTANT GENERAL SECRETARY
INDUSTRIALL GLOBAL UNION

Six years after Rana Plaza, the deadliest disaster in the garment industry, independent and transparent fire and building inspections by the Bangladesh Accord have transformed the safety of garment factories in the country.

Brands produce a lot of information about what they're doing to improve conditions in their supply chains, but it's only through transparency that this information can be verified.

Transparency allows us to assess whether the strategies companies are using are effective, for example, checking to see if living wage strategies actually result in higher wages for workers.

This year's Transparency Index shows that just 16.5% of brands reveal how they're

implementing their approach to paying living wages to workers in their supply chains, and only 4% report on their progress.

With increased transparency, we can make the connection between corporate social responsibility policies and their impact on the ground.

Extending transparency to cover purchasing practices is an essential next step. Whatever social responsibility measures a company is taking, these can be undermined by its own buying practices. There's no point in brands saying they support decent working hours if they expect suppliers to meet increasingly tight lead times.

Only 9% of brands surveyed by the Index

“With increased transparency, we can make the connection between corporate social responsibility policies and their impact on the ground.”

have a formal process for gathering supplier feedback on brands' purchasing practices. Transparency opens a conversation between companies and trade unions about what needs to change in the way brands do business with suppliers, to stop the downward pressure on wages and working conditions.

While an encouraging 77% of brands publish a policy on freedom of association and collective bargaining in their Supplier Code of Conduct, only 4% disclose the number of supplier facilities that have independent, democratically elected trade unions.

Transparency around the presence of trade unions in supplier factories, and the existence of collective bargaining agreements, will expose the devastating

impact of decades of hostility to trade unions from employers and governments, resulting in extremely low levels of representation of workers.

The stark reality is that taking a supposedly neutral stance on freedom of association does nothing to remove the huge barriers to workers exercising their fundamental right to organize, and that if garment workers are to have better wages and working conditions, concrete measures need to be taken to make it easier to join a union and bargain collectively.

VIEWPOINT:

MORE TRANSPARENCY CAN HELP THE GARMENT SECTOR TACKLE WORKPLACE VIOLENCE AND HARASSMENT



HESTER LE ROUX
SENIOR ECONOMIC ADVISOR – POLICY AND ADVOCACY
CARE INTERNATIONAL UK

Millions of women experience violence and harassment at work. Not surprisingly, this takes an enormous physical, psychological and economic toll on the women concerned. It also costs businesses billions in lost productivity and associated costs. But a proposed new International Labour Organisation (ILO) Convention, to be negotiated in June 2019, could help end violence and harassment in the world of work, creating protection for the most vulnerable workers. It is critical that businesses and brands urge their representative bodies to support the Convention.

Violence and harassment of women in the workplace remains one of the most tolerated abuses of human and workers' rights. It is an intractable injustice to

overcome as the reasons behind it are multiple and complex, stemming from deep-rooted issues not just in the workplace but also in laws and society at large: from unacceptable behaviours at work to the absence of legislation preventing them; from power imbalances deterring women from reporting violence to a lack of support when they do; from deeply entrenched social norms that normalise violence to the suppression of women's voices to claim their rights.

CARE's recent research suggests that up to half of women garment workers in South East Asia have experienced sexual harassment in the workplace. Yet this issue is largely hidden – it is not talked about or reported; and certainly not picked up in a typical social audit. The general lack of

transparency that marks the garment sector is especially damaging when it comes to violence and harassment at work. Many employers simply do not regard abuse and harassment of female employees as a problem.

The risk of violence and harassment is higher for women in informal and more precarious forms of work, like those typically found in the lower and subcontracted tiers of the supply chain. As this Transparency Index confirms, too little is known about who works in these furthest reaches of brands' supply chains and the conditions they face. This extends to a failure to track and disclose incidents of violence and harassment. Current competitive sourcing practices also discourage transparency from suppliers, who worry that they would be penalised by their buyers if they report incidents.

Tackling this complex issue requires action on several fronts: employers need to step up and implement effective systems for preventing and responding to violence and harassment at work; governments should legislate and implement systems for protection, reporting and support to survivors; and women need platforms to advocate for their rights.

“The general lack of transparency that marks the garment sector is especially damaging when it comes to violence and harassment at work.”

This year, the ILO has a unique opportunity to adopt a new global Convention to end violence and harassment in the world of work. Any government that ratifies the proposed Convention will commit to enacting legislation requiring employers to take steps to prevent violence and harassment in the world of work, and to ensure that workers have access to safe, fair and effective reporting and dispute resolution mechanisms. A new global treaty could help raise the profile of this wide-spread problem, the extent of which has remained hidden for too long. It would also provide much-needed guidance both to governments and employers on effectively tackling it.

"2019 will be the year where we will need to take a hard look on the fashion industry's impact on the accelerating climate crisis. The textile industry accounts for 8% of global CO2 emissions (3,990 million metric tons CO2eq) - equalling the total CO2 emissions of the European Union and more than all international air travel and maritime shipping combined.

The textile sector is one of the most greenhouse gas intensive industries, with fossil fuel driven factories in Asian countries; ubiquitous polyester being produced from crude oil; a linear and wasteful economic model; and the industries' continuing preference of quantity over quality.

With only 12 years left to reach the ambitious goal of limiting global heating to 1.5 degrees celsius, companies in each stage of textile production and logistics have to ask themselves one question: Are you part of the problem or the solution?

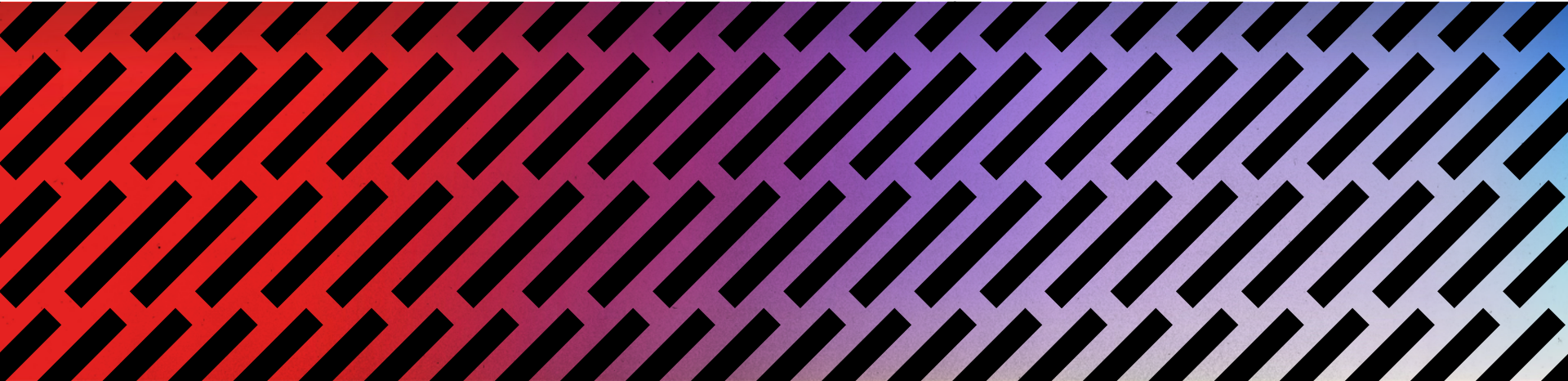
Transparency is key in understanding how much each company contributes to greenhouse gas emissions by sourcing, dyeing, producing and shipping their garments. It is time for climate action now."

KIRSTEN BRODDE
PROJECT LEAD OF THE DETOX
CAMPAIGN AT GREENPEACE



5

**WHAT SHOULD
YOU DO
WITH THIS
INFORMATION?**



CITIZENS

We hope the Fashion Transparency Index has helped you understand more about the human rights and environmental policies, practices and impacts of the world's largest fashion brands and retailers. With this information, we invite you to ask brands #WhoMadeMyClothes and demand greater transparency.

At the moment the public does not have enough information about where and how clothing is made. As consumers, we have the right to know that our money is not supporting exploitation, human rights abuses and environmental destruction. But there is no way to hold companies and governments to account if information about what we buy is kept secret.

We should be able to easily scrutinise the brands that we spend our hard-earned money with and make choices that better align with our values. We can't do that without comprehensive, credible and comparable information about their policies, practices, and crucially, the impacts and outcomes of their efforts. This is why greater transparency is so essential.

Finally, we hope this research activates you to dig even deeper into the production processes and people behind what you wear. We hope it makes you think twice about where and how you spend your money.

Find out how to get involved in the campaign:
www.fashionrevolution.org/get-involved

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

- Always ask the brands you buy [#WhoMadeMyClothes](#) You can do this by tagging your favourite brands on social media and using the hashtag, or you can use our [automated email tool](#) to get in touch directly. Why ask this question? Because it sends brands a strong message: you care about the way your clothes have been made and want the assurance that the people making them have been paid fairly, treated with respect and that the environment wasn't destroyed in the process. Brands are listening, tell them to do more!
- Ask your elected government officials to do two things:

 - Require fashion brands to be transparent, demand that brands disclose who their suppliers are and that they report annually on their social and environmental impacts across the entire value chain using a common framework;
 - Make fashion brands legally responsible for the impacts they have on our ecosystems and the lives of people working in their supply chains, at home and abroad.

You can do this using our [write a postcard to a policymaker](#) tool.

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.

It has been encouraging to see many leading brands and retailers become considerably more transparent since we first started doing this research back in 2016. However, you can and should do more!

You have the power, resources and moral imperative to ensure that every single person working to make your products is paid fairly, treated with dignity and working in safe conditions. In the face of our accelerating climate catastrophe, you have a huge responsibility to move faster on reducing the consumption of earth's finite resources and creating business models that are regenerative instead of destructive and linear.

By being more transparent about your policies, practices and impacts, your customers and stakeholders can come along with you on that journey, celebrating and supporting where you get it right and scrutinising the areas where you could be doing even better.

Finally, we hope that participating in the Fashion Transparency Index has been a useful exercise, helping you to understand where you are leading and lagging on transparency compared to your industry peers.

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

- Publicly disclose your manufacturers and suppliers, provide lists which are downloadable and in accessible formats that your stakeholders can use;
- Publish more easy-to-understand information about your social and environmental practices as well as the outcomes and impacts of your efforts across the entire supply chain;
- Publish direct contact details (email address or phone number) for your sustainability or compliance teams, so that your customers and stakeholders can easily get in touch with questions and concerns;
- Share more information about your purchasing practices and the steps you are taking to be a responsible business partner to your suppliers;
- Disclose more environmental data about the amount of carbon emissions, water consumption, pollution and waste created throughout the length of your value chain, and what you're doing to reduce your footprint;
- Answer your customers' [#WhoMadeMyClothes](#) requests on social media or via email with practical information and data, not just your policies and principles.

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 through the courts. This needs to change.

Transparency is beginning to become subject to legislation. For example, in the UK, companies must now disclose their gender pay gap.

France passed a law in 2017 which requires corporations to assess and address the adverse impacts of their activities on people and the planet, by having them publish annual, public vigilance plans. This includes impacts linked to their own activities, those of companies under their control, and those of suppliers and subcontractors,

with whom they have an established commercial relationship.

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. Similar legislation was recently passed in Australia, and in 2016 the U.S. banned the import of goods made by child and forced labour.

The European Union is currently discussing a number of measures that would legally require companies to carry out risk-assessments across their supply chains. This builds upon the 2014 EU Directive which requires the disclosure of non-financial and diversity information by large companies.

We hope the findings of the Fashion Transparency Index demonstrate the urgent need for stronger mandatory due diligence and transparent reporting from major fashion brands and retailers. Your constituents deserve to know that the clothes and shoes they buy and wear have not contributed to human exploitation and environmental degradation.

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

- Legislate and support transparency – i.e. mandatory due diligence and standardised disclosure by brands on human rights and environmental issues;
- Better implement and enforce existing laws that are meant to protect workers and the environment everywhere;
- Make companies at home liable for human rights and environmental harms caused directly or by business partners across its global supply chain, if companies fail to take effective measures to stop harms materialising in the first place.

CIVIL SOCIETY GROUPS, TRADE UNIONS & WORKERS

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

This research should help you better understand which major fashion brands are publishing their supplier lists as well as what policies, procedures and commitments that brands claim to have in place so that you can hold them to their word.

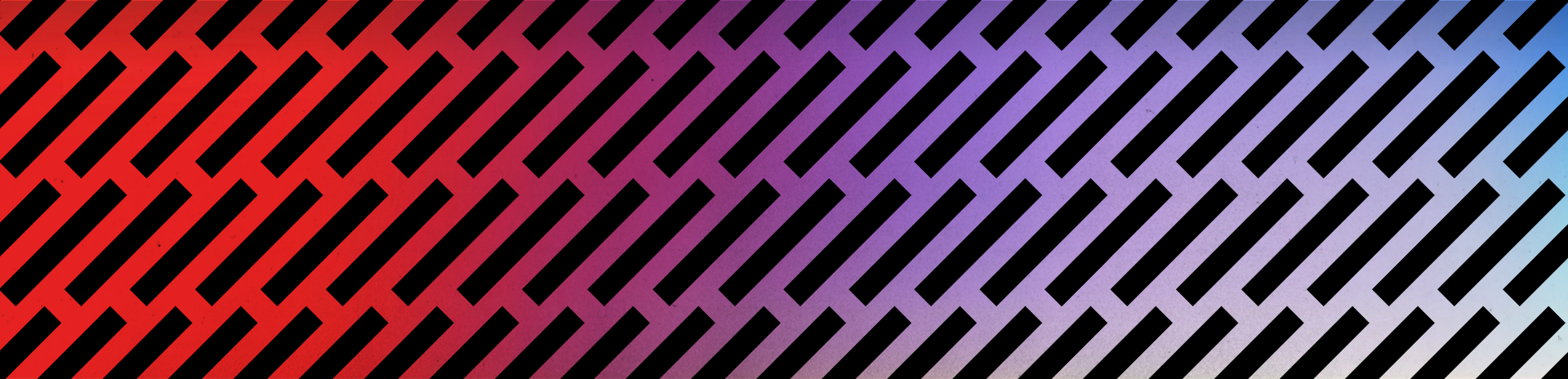
Fashion Revolution commits to supporting complementary campaign efforts by other NGOs, civil society groups, unions and workers, wherever possible.

We invite you to get in touch with us to discuss our findings further and how this research could help you in your efforts to protect workers and the environment.

We encourage civil society groups and trade unions to:

- Support our call for citizens to ask brands [#WhoMadeMyClothes](#). Find out how [here](#).
- Invite workers you know in the supply chain to tell the world their story using our hashtag [#IMadeYourClothes](#). Find out how to activate [here](#).
- Join us in encouraging brands to publicly disclose supplier lists and more detailed supply chain information;
- Join us in asking governments and policymakers for mandatory due diligence and standardised reporting;
- Please send us information about how you would like to see the fashion industry improve. Let's work together!

6 ACKNOWLEDGEMENTS



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Thank you to the brands and their representatives who took the time to engage with us and complete the 2019 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 Nazma Akter, Kirsten Brodde, Christina Hajagos-Clausen, Mary Creagh, Shafiq Hassan, Jenny Holdcroft, Abhishek Jani, Hester Le Roux and Tolly Dolly Posh for your important written contributions to this report.

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We would like to thank you for reading this report and to take this opportunity to remind you that Fashion Revolution is a charitable organisation. This means that everything we do is made possible by support from grants and donations from people like you.

By making a small donation, you will be making a big difference to Fashion Revolution's important work demanding a cleaner, safer, fairer, and more transparent fashion industry.

It's easy to do. Please visit the donate page on our website where you can choose to donate any amount, or even opt to make a regular monthly donation:

www.fashionrevolution.org/donate

With your help, we can continue to create resources such as the Fashion Transparency Index, spark an even wider global conversation about the impacts of our clothes and create positive change. Thank you!



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C&A Foundation

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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](#))

Capacity building projects often refers to activities that seek to strengthen the skills, competencies and abilities of people and communities in developing societies so they can overcome the causes of their exclusion and suffering. (Source: [Oxfam](#))

Carbon Emissions means the release of Carbon Dioxide (CO₂), a greenhouse gas (GHG), into the atmosphere over a specified period of time. GHGs, such as CO₂ and methane, are any gases which absorb and re-emit heat, and thereby keep the planet's atmosphere warmer than it otherwise would be. (Source: [OECD](#) and [Ecometrica](#))

Circularity (or Circular Economy) is an alternative to a traditional linear economy (make, use, dispose) in which we keep resources in use for as long as possible, extract the maximum value from them whilst in use, then recover and regenerate products and materials at the end of each service life. (Source: [WRAP](#))

CSR (Corporate Social Responsibility) is a corporation's initiatives to assess and take responsibility for its 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](#))

Equal pay means that men and women in the same employment performing equal work must receive equal remuneration. This applies not only to salary, but to all contractual terms and conditions of employment, such as holiday entitlement, bonuses, pay and reward schemes, pension payments and other benefits. (Source: [Equality and Human Rights Commission](#))

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](#))

Gender pay gap is defined as the difference in median pay between men and women. (Source: [Office for National Statistics](#))

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](#))

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](#))

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](#))

Restricted Substance List sets out the specific chemicals substances that are not allowed to be used in products or manufacturing processes. Typical hazardous substances that are restricted include lead, AZO dyes, DMF, PAHs, Phthalates, PFOS, the nickel release and so on. (Source: [CIRS-REACH](#))

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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ORGANISATIONS FOR FURTHER RESEARCH:

ACT
actonlivingwages.com

Alliance for Bangladesh worker safety
www.bangladeshworkersafety.org

Bangladesh Accord on Fire & Building Safety
bangladeshaccord.org

Better Buying
betterbuying.org

Better Work
betterwork.org

Canopy
canopyplanet.org/campaigns/canopystyle

CARE International
www.care-international.org/what-we-do/womens-economic-empowerment

Clean Clothes Campaign
cleanclothes.org

Changing Markets Foundation
changingmarkets.org

Environmental Justice Foundation
ejfoundation.org

Ethical Trading Initiative
www.ethicaltrade.org

Fair Labor Association
www.fairlabor.org

Fairtrade International
www.fairtrade.net

Fair Wear Foundation
www.fairwear.org

Greenpeace
www.greenpeace.org/international/act/detox

Human Rights Watch
www.hrw.org

IndustriALL Global Union
industriall-union.org/en

International Corporate Accountability Roundtable
www.icar.ngo

Know the Chain
knowthechain.org

Sustainable Apparel Coalition
apparelcoalition.org

Textile Exchange
textileexchange.org

Worker Rights Consortium
www.workersrights.org

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 believes that the entire fashion industry needs a radical paradigm shift and that the way that we produce, sell, consume and dispose of clothes needs to be holistically transformed. Transparency helps to reveal the structures of fashion industry so we can better understand how to change this system in a fundamental, long-lasting and positive way.

Read our [Manifesto for a Fashion Revolution](#). If you share the same dream for the fashion industry, please sign it and join our movement.

ABOUT *FASHION REVOLUTION*



Fashion Revolution is the world's largest fashion activism movement. We are a global campaign working towards systemic reform of the fashion industry with a focus on transparency.

We love fashion, but we don't want our clothes to come at the cost of people or our planet.

We are working year-round to raise awareness of the industry's most pressing issues. We encourage positive change and celebrate the artisans, the farmers, the spinners, the weavers, the seamstresses, the pioneers and all the diverse people who design and make our clothes all around the world.

Our mantra is:

Be Curious. Find Out. Do Something.

www.fashionrevolution.org

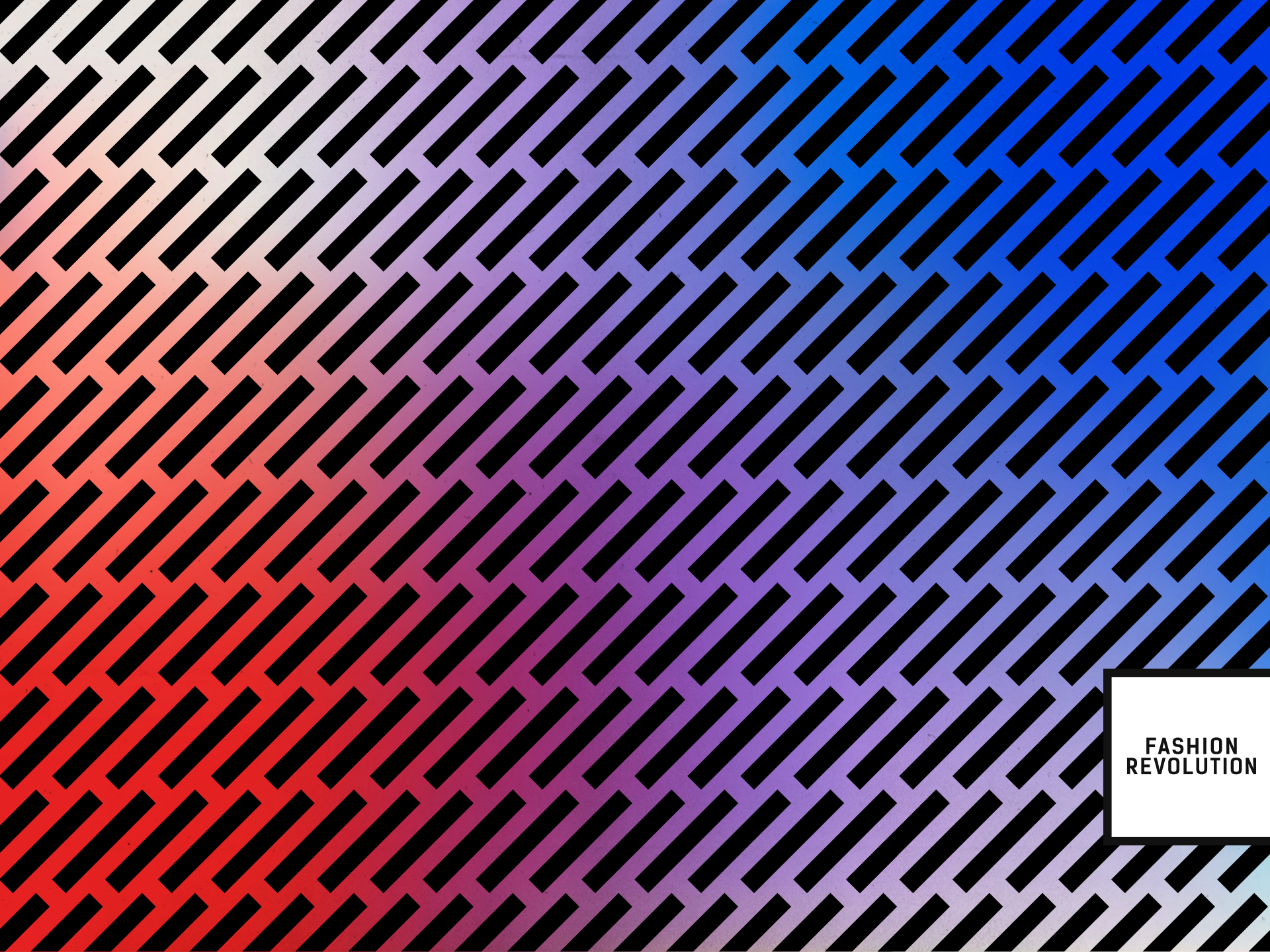
 [@Fash_Rev](https://twitter.com/Fash_Rev)

 [Fash_rev](https://www.instagram.com/Fash_rev)

 facebook.com/fashionrevolution.org

"The fashion industry was built on secrecy and elitism; it was opaque. Transparency is disruptive - in that sense, it's a breath of fresh air and a useful weapon of change."

ORSOLA DE CASTRO
CO FOUNDER, FASHION REVOLUTION



**FASHION
REVOLUTION**