



# **Brand Performance Check**

## **Van Heurck nv**

This report covers the evaluation period 01-02-2022 to 31-01-2023

## About the Brand Performance Check

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

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

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

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

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

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

# Scoring overview

Total score: 136

Possible score: 182

Benchmarking Score: 75

Performance Benchmarking Category: Leader



## Summary:

Van Heurck has shown advanced results on performance indicators and has made exceptional progress. With a total benchmarking score of 75, the member is placed in the Leader category.

In 2022/2023, Van Heurck has still experienced strong sales growth. Van Heurck is part of the investment group VP Capital, the same as the member brands HAVEP and Hydrowear. All three member brands cooperate closely together to increase their influence.

Since Van Heurck owns three production locations in Tunisia, where it sources all of its production, it enables the member brand with its local team to address influencing labour conditions and strongly integrates that into its sourcing strategy and business model. Therefore, 99% of the production volume comes from suppliers where the member has more than 80-90% leverage. Additionally, Van Heurck works with four subcontracting partners, mainly for the embroidery process.

Van Heurck has a risk analysis in line with the OECD requirements. This was done in cooperation with the other two member brands, Hydrowear and Van Heurck. Van Heurck conducts risk scoping and includes all eight labour standards. Van Heurck systematically identifies human rights risks in its supply chain and has assessed the risks for each production location. For conducting its risk assessment on the supplier level, Van Heurck uses mainly Fair Wear audits and Corrective Action Plan (CAP) findings, which include worker and stakeholder input and other third-party audits in its monitoring. Van Heurck can also demonstrate advanced knowledge and understanding of Freedom of Association (FoA) in its sourcing country, Tunisia. Fair Wear strongly recommends including the subcontracting partners in its risk assessment as well.

All production locations in Tunisia follow CBA remuneration schedules, which are confirmed in Fair Wear audits. Van Heurck implemented a bonus system based on production and quality. By increasing this bonus system, Van Heurck gradually wants to decrease the gap between paid wages and living wages. In 2022/2023, Van Heurck also paid higher minute prices to allow an increase in wages and bonuses as well.

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

## Performance Category Overview

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

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

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

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

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

# Company Profile Van Heurck nv

## Member company information

Member since: 1 Jan 2019

Product types: Workwear

Percentage of CMT production versus support processes 76%

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

Percentage of FOB purchased directly 100%

Percentage of FOB purchased through agents or intermediaries 0%

Percentage of turnover of external brands resold 0%

FLA Member No

Number of complaints received last financial year 0

## Basic requirements

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

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

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

Production Country	Number of production locations	Percentage of production volume
Tunisia	8	100%

# Layer 1 Foundational system's criteria

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**Possible Points: 8**

**Earned Points: 8**

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

Comment: Van Heurck has a solid Responsible Business Conduct Policy in place.

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

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

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

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

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

Comment: Van Heurck discloses 88% of production locations internally through Fair Wear's information management system.

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

**Comment:** Van Heurck discloses 88% of production locations externally on Fair Wear's transparency portal.

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



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

**Possible Points: 78**

**Earned Points: 64**

### Indicators on Sourcing strategy

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

**Comment:** Van Heurck has a sourcing strategy addressing influencing labour conditions. The sourcing strategy is included in the member brand's Responsible Business Conduct (RBC) policy. The member brand owns three production locations in Tunisia. Therefore, 99% of the production volume comes from suppliers where the member has more than 80-90% leverage. Additionally, Van Heurck works with four subcontracting partners, mainly for the embroidery process. That is why less than 1% of the production volume comes from suppliers, where Van Heurck buys less than 2% of its total FOB.

Van Heurck's RBC Policy links to the Common Framework for Responsible Purchasing Practices (CFRPP). The CFRPP explicitly focuses on increasing influence through active cooperation with other clients. Furthermore, Van Heurck is part of the investment group VP Capital, the same as the member brands HAVEP and Hydrowear. All three member brands cooperate closely together to increase their influence. As Van Heurck only produces in its own three factories, consolidation is not included in its sourcing strategy.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.2 Member company's sourcing strategy is focused on building long-term relationships.	Intermediate	Stable business relationships underpin the implementation of the Code of Labour Practices and give factories a reason to invest in improving working conditions.	Strategy documents; % of FOB from suppliers where a business relationship has existed for more than five years; Examples of contracts outlining a commitment to long-term relationship; Evidence of shared forecasting.	4	6	0

**Comment:** Van Heurck has a sourcing strategy that focuses on maintaining long-term relationships. Almost 100% of the member's FOB volume comes from suppliers with whom Van Heurck has had a business relationship for at least five years, including subcontracting partners. As Van Heurck owns its production locations in Tunisia, there is no need for long-term contracts with the suppliers. Van Heurck has not committed to long-term contracts with its subcontracting partners yet.

**Recommendation:** Fair Wear recommends Van Heurck to commit to long-term contracts with its subcontracting partners.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.3 Member company conducts a risk scoping exercise as part of its sourcing strategy.	Intermediate	Human rights due diligence, according to the OECD guidelines, requires companies to undertake a scoping exercise to identify and mitigate potential human rights risks in supply chains of potential business partners.	HRDD policy; Sourcing strategy linked to results of scoping exercise; HRDD processes, including specific responsibilities of different departments; Use of country studies; Analysis of business and sourcing model risks; Use of licensees and/or design collaborations.	4	6	-2

**Comment:** Van Heurck has a risk analysis in line with the OECD requirements. This was done in cooperation with the other two member brands, Hydrowear and HAVEP. Van Heurck conducts risk scoping and includes all eight labour standards. Van Heurck uses Fair Wear country studies and other external sources to identify country risks and the likelihood and severity of the risks and then classifies the risks into a risk level and a risk matrix. The member brand has not included a business model, sourcing model and product level in its risk scoping. The risk scoping includes a gender lens for all labour standards. Van Heurck has yet to include input from workers, suppliers and stakeholders.

Van Heurck only produces in Tunisia. Here, the member brand identified risks such as freedom of association and living wages for Tunisia and discrimination. However, Van Heurck sees that Tunisian laws and regulations allow Freedom of association and the right of collective bargaining. Most factories have set up the Company Consultative Committee (CCC). Nevertheless, Van Heurck sees a high risk because of the governmental influence of collective bargaining in Tunisia. Another risk in Tunisia is that high inflation in 2022 will affect living wages as it reduces the ability of people to pay for their needs for a decent life.

Van Heurck's sourcing strategy also privileges countries where workers can freely form or join a trade union and bargain collectively.

**Recommendation:** Fair Wear recommends Van Heurck to include all risk factors in its risk scoping and to include input from workers, suppliers, and other stakeholders in its risk-scoping exercise.

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

**Comment:** It is the standard process for Van Heurck to inform new suppliers about Fair Wear membership. Van Heurck defined an onboarding process for new suppliers in its sourcing strategy, which is part of the RBC policy. The process applies before placing the first order. First, Van Heurck sends out information about Fair Wear membership, as well as the Fair Wear Code of Labour Practices (CoLP) and the Worker Information Sheet (WIS). Additionally, the member brand requests further information from the potential supplier in a questionnaire to collect more detailed data about other audit results or subcontracting partners. In 2022, Van Heurck did not onboard new suppliers or subcontracting partners.

Van Heurck has CSR staff in Tunisia that is responsible for following up on all Fair Wear-related requirements in the factories. The local CSR team is strongly connected to the CSR and purchasing department in Belgium. The local team visit potential suppliers or subcontracting partners as well. Here, the member brand started a dialogue with suppliers about human rights.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.5 Member company collects the necessary human rights information to inform sourcing decisions before finalising the first purchase order.	2nd+ year member and no new production locations selected.	Human rights due diligence processes are necessary to identify and mitigate potential human rights risks in supply chains. Specific risks per factory need to be considered as part of the decision to start cooperation and/or place purchasing orders.	Questionnaire with CoLP, reviewing and collecting existing external information, evidence of investigating operational-level grievance system, union and independent worker committee presence, collective bargaining agreements, engaging in conversations with other customers and other stakeholders, including workers.	N/A	6	0

**Comment:** In the previous financial year, Van Heurck has not added any new suppliers.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.6 Member actively ensures awareness of the Fair Wear CoLP, the complaints helpline, and social dialogue mechanisms within the first year of starting business.	No production locations in the first year of business.	This indicator focuses on the preliminary mitigation of risks by actively raising awareness about the Fair Wear Code of Labour Practices and complaints helpline. Discussing Fair Wear's CoLP with management and workers is a key step towards ensuring sustainable improvements in working conditions and developing social dialogue at the supplier level.	Evidence of social dialogue awareness raised through earlier training/onboarding programmes, onboarding materials, information sessions on the factory grievance system and complaints helpline, use of Fair Wear factory guide, awareness-raising videos, and the CoLP.	N/A	6	0

**Comment:** In the previous financial year, Van Heurck has not added any new suppliers.

## Indicators on Identifying continuous human rights risks

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

**Comment:** Van Heurck systematically identifies human rights risks in its supply chain and has assessed the risks for each production location. For conducting its risk assessment on supplier level, Van Heurck uses mainly Fair Wear audits and Corrective Action Plan (CAP) findings, which include worker and stakeholder input and other third-party audits in its monitoring. Fair Wear audits are conducted every three years. Van Heurck did not include the subcontracting partners in its risk assessment yet.

The local team in Tunisia is always on-site in the factories and in close contact with the CSR and purchasing department in Belgium. This ensures a fluent information flow and short-term actions in case they are needed to remediate and mitigate issues. This also allows Van Heurck to adjust the risk assessment based on that information frequently. The CEO visits the suppliers on a regular basis and provides feedback as well. The risk assessment does include an assessment of the likelihood and severity and a risk matrix. The highest risks identified are about living wage and health and safety.

**Recommendation:** Van Heurck should include subcontractors in its monitoring system.

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

**Comment:** Van Heurck can demonstrate advanced knowledge and understanding of FoA in its sourcing country, Tunisia. This includes the risks to women workers. Van Heurck sees a high risk because of the governmental influence of collective bargaining in Tunisia. Negotiations with unions could not take place without the authorisation from the head of government. Van Heurck identified that the risk for women in that field is even higher. The member brand knows that men and women are often disproportionately represented in unions. Van Heurck uses country-level information to understand the risks to its suppliers and informs itself on how to engage with its suppliers on this topic. A Company Consultative Committee (CCC) is active at its own production locations in Tunisia, and a collective bargaining agreement is in place. The elections for the CCC take place every three years. Two-thirds of the elected worker representatives are women. There is no active trade union in the three factories yet. Van Heurck identified that this is mainly because of a lack of awareness among workers regarding trade unions.

Van Heurck has not yet mapped the risks to FoA for its subcontracting partners in Tunisia.

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

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.9 Member company includes a gender analysis throughout their continuous monitoring of human rights risks, to foster a better understanding of gendered implications.	Intermediate	Investing in gender equality creates a ripple effect of positive societal outcomes. Members must apply gender analyses to their supply chain to better address inequalities, violence, and harassment.	Evidence of use of the gender mapping tools and knowledge of country-specific fact sheets.	4	6	0

**Comment:** Van Heurck has included gender in its risk scoping. The member could show it understands the basic gender risks for its sourcing country and, for instance, identified gender-based violence, gender equality and discrimination as significant risks prevalent in Tunisia. The risk scoping includes a gender lens by analysing the risks of all eight labour standards.



Additionally, Van Heurck started collecting gender data for its own production locations in Tunisia. Here, the member brand focused on collecting data on gender division per job role, demographics and whether there is an active anti-harassment committee. This information is not yet included in the risk assessment. Van Heurck has not specifically looked into how its business practices affect gender at its production locations. Van Heurck has not yet collected gender data for its subcontracting partners in Tunisia.

**Recommendation:** Van Heurck is recommended to collect gender data per factory related to every Code of Labour Practices. Van Heurck is recommended to start collecting gender data for its subcontracting partners in Tunisia.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.10 Member company considers a production location's human rights performance in its purchasing decisions.	Intermediate	Systematic evaluation is part of continuous human rights monitoring. A systematic approach to evaluating production location performance is necessary to integrate social compliance into normal business processes and to support good decision-making.	Supplier evaluation format, meeting notes on supplier evaluation shared with the factory, processes outlining purchasing decisions, link to responsible exit strategy.	2	4	0

**Comment:** Van Heurck has a short supply chain. The managing director of the brand, the CSR manager, the factory management, and the quality manager are involved in reviewing the outcomes of the audits, production planning, and issues at the factory. All findings are discussed and addressed on a daily basis.

As Van Heurck is part of the VP Capital investment group, the evaluation of its production locations is also presented and added to the overall supplier evaluation of VP Capital. Here, suppliers are evaluated on a balanced scorecard principle, where factories are assessed on Corporate Social Responsibility (CSR), quality, product development and supply chain efficiency criteria. Compared to other criteria, CSR accounts for 50% of the overall rating. The results of the supplier evaluation are discussed with the suppliers for improvement discussions. The outcomes are not shared with worker representatives. The local team in Tunisia, the CSR manager, the purchasing department and top management will be in close contact with the supplier and have many discussions, as well as onsite visits, which will follow.

The subcontracting partners in Tunisia are not yet included in the evaluation process.

**Recommendation:** Van Heurck is strongly recommended to evaluate the human rights performance of its subcontracting partners as well. Fair Wear also recommends Van Heurck share and discuss the outcome of the supplier evaluation with all its suppliers and their worker representatives.

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

**Comment:** Van Heurck sources from three production locations owned by the brand. The suppliers only outsource support processes to production locations that are selected and directly monitored by the supplier. These subcontractors have been informed of Fair Wear membership requirements.

Van Heurck can follow each product during the CMT process. In this way, Van Heurck knows exactly when and where something is produced, hence giving the brand a full overview of all locations that produce for Van Heurck.

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

**Comment:** Van Heurck has identified whether homework is prevalent in Tunisia. According to the member, there is a very low risk of homeworkers being used because Van Heurck owns the three production locations in Tunisia. Therefore, the member brand has detailed insights into production processes. Also, the subcontracting partners are monitored by the local teams and the supplier directly.

## Indicators on Responsible purchasing practices

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.13 Member company's written contracts with suppliers support the implementation of Fair Wear's Code of Labour Practices and human rights due diligence, emphasising fair payment terms.	Intermediate	Written, binding agreements between brands and suppliers, which support the Fair Wears CoLP and human rights due diligence, are crucial to ensuring fairness in implementing decent work across the supply chain.	Suppliers' codes of conduct, contracts, agreements, purchasing terms and conditions, or supplier manuals.	2	4	0

**Comment:** Van Heurck does not use contracts with its suppliers. The member brand owns the three production locations in Tunisia. Therefore, the member brand is aware of the supplier's cash flow situation and generally, all invoices are paid on time. The brand paid in advance on some occasions during the year. Invoices are paid on a weekly basis.

Van Heurck does not use contracts with its subcontracting partners.

**Recommendation:** Van Heurck is recommended to use written contracts with its subcontracting partners that include shared responsibilities and support the implementation of human rights due diligence.

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

**Comment:** There is an active interchange of information between CSR, top management and other departments to enable coherent and responsible business practices. The VP Capital Group works with specific KPIs on a governance level. Nevertheless, the member has not yet included responsible business practices in job role competencies, nor do sourcing and purchasing staff work with Key Performance Indicators (KPIs), supporting good sourcing and pricing strategies.

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

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

**Comment:** The production planning is managed jointly by the brand and suppliers. This is done with the support of a sophisticated ERP system that offers real-time insights on fabric, component availability/ shipping time, factory capacity, labour minutes per style and lead time. This information is automatically updated and ensures that the factory does not overestimate its capacity to take additional orders that may contribute to excessive overtime. The planning of Van Heurck follows the stock of fabrics and the amount of minutes available, not the other way around. If there are short-term or specific customer orders, these are discussed in detail on-site, and the capacities in the production locations are analysed.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
2.16 Member company can demonstrate the link between its buying prices and wage levels at production locations.	Advanced	Understanding the labour component of buying prices is an essential first step for member companies towards ensuring the payment of minimum wages - and towards the implementation of living wages.	Interviews with production staff, documents related to member's pricing policy and system, buying contracts, cost sheets including labour minutes.	6	6	0

**Comment:** The member brand and the factories work on open costing and price setting on the shared ERP system. Per product, the brand and supplier set up a Bill of Material (BOM). This gives a detailed overview of the costs of all materials, fabric, and transport. Part of this BOM is the Bill of Labor (BOL). This shows a precise overview of the number of minutes that are needed to make a specific garment and the amount Van Heurck pays for that product to the supplier. 71% of the BOL is for the wages of the workers.

Each year, the supplier and Van Heurck determine the price for the factory. In 2022, the average price for a labour minute was 0.14 euros, in comparison to 0.12 euros in 2021.

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

**Comment:** Van Heurck's sourcing model purposely excludes the use of sourcing intermediaries.



## Layer 3 Prevention, mitigation and remediation

**Possible Points: 86**

**Earned Points: 58**

### Indicators on the quality and coherence of a members' prevention and remediation system

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.1 Member company integrates outcomes of human rights risk identification (layer 2) into prioritisation and follow-up programmes according to the risk profile.	Intermediate	Based on the risk assessment outcomes, a factory risk profile can be determined with accompanying intervention strategies, including improvement and prevention programmes.	Overview of supplier base with accompanying risk profile and follow-up programmes.	4	6	0

**Comment:** Van Heurck started creating follow-up plans for the production locations based on audit reports. The follow-up plans do not specifically take the supplier's risk assessment into account. The follow-up plans describe a general contextualisation and the brand's monitoring actions. Here, the member brand heavily relies on CAPs. Besides that, Van Heurck plans to conduct further training in the production locations. Another prioritised follow-up action is to raise awareness about anti-harassment in its production locations and to collect more specific gender data.

**Recommendation:** Fair Wear recommends the member to further complete its follow-up plans.



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

**Comment:** As described in 2.9, Van Heurck started collecting gender data at its production locations. The collected data shows the division per job role, especially for the supervisor role in the factory. The member brand analysed if there are anti-harassment committees or policies in the factories. Here, Van Heurck started a dialogue with its suppliers and provided its factories with additional guidance.

Van Heurck plans to conduct anti-harassment training in the future, focussing on education and awareness raising about this topic, especially by also supporting social dialogue in its production locations.

**Recommendation:** Van Heurck is recommended to extend its gender lens to the implementation of all its improvement actions.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.3 Member company's improvement and prevention programmes include steps to encourage freedom of association and effective social dialogue.	Intermediate	Freedom of Association and Collective Bargaining are enabling rights. Therefore, ensuring they are prioritised in improvement and prevention programmes can help support improvements in all other areas.	Available prevention and improvement programmes, including stakeholder input.	4	6	0

**Comment:** Van Heurck included some steps to encourage FoA and effective social dialogue in its improvement or prevention actions. Van Heurck stays informed to check if the elected Company Consultative Committee (CCC) is involved in meaningful discussions. The local staff in Tunisia is in constant dialogue with the worker representatives.

In Tunisia, the garment workforce's key trade union is the Tunisian General Union of Workers (UGTT). The UGTT represents the interests of garment workers and has played a strong role in the negotiation of working conditions and collective bargaining agreements (CBA) in the garment industry in Tunisia. All production locations follow CBA remuneration.

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

**Recommendation:** Van Heurck is recommended to support in financing training on FoA and social dialogue for its suppliers. Fair Wear also recommends Van Heurck to apply a gender lens and ensure its steps to promote FoA and effective social dialogue address the specific risks for female workers.

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

**Comment:** Van Heurck's local staff in Tunisia checks on a regular basis if the internal grievance mechanism is working and asks if worker representatives are involved in the follow-up of the filed complaints. In some cases, Van Heurck's local staff is also involved in solving the complaints. Due to findings in the Corrective Action Plan (CAP), Van Heurck supported the awareness raising of the internal grievance mechanism by hanging informative posters for workers and showing information about this on the screens in the factories.

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

**Comment:** Van Heurck and two Fair Wear member brands are part of an investment company (VP Capital) and actively cooperate together. The member brands share all relevant documents, CAPs, and audits and split the costs for the Workplace Education Programme (WEP) training, etc. Together, they have a leverage of 90%. The other two brands sourcing from the same suppliers are not a member of Fair Wear. They also share some information with each other, but less intensively.

### Indicators on implementation: improvement and prevention

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.6 Degree of progress towards implementation of improvement programme per relevant factory.	32%	Fair Wear expects members to show progress towards the implementation of improvement programmes. Members are expected to be actively involved in the examination and remediation of any factory-specific problem.	Progress reports on improvement programmes.	2	6	-2

**Comment:** In the past financial year, Van Heurck has received one Fair Wear audit report from Tunisia. For the other two production locations, Van Heurck has Fair Wear audit reports from 2020 and 2021. During the performance check, the member could demonstrate with a sample that one-third of the CAP issues requiring improvement actions have been followed up. Improvement actions relate primarily to health and safety findings or lack of effective internal grievance mechanisms. The CAP issues that require improvement actions and are still open are more complex or structural issues and, therefore, need more time to be remediated. These are primarily issues related to overtime and wages.

**Recommendation:** As Van Heurck owns the production locations in Tunisia, Fair Wear strongly recommends ensuring also more complex or structural issues are solved within a shorter timeframe.

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

**Comment:** Van Heurck has identified some root causes of the CAP issues, especially related to health and safety findings or lack of effective internal grievance mechanisms and discussed these with its factories. The member has not yet started to develop some preventive steps addressing these root causes.

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

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

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

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

**Comment:** In the previous year, the Fair Wear audit did not mention excessive overtime. The production locations track all minutes of the workers. Fair Wear audit reports from the other two production locations from 2020 and 2021 did not mention excessive overtime.

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

**Comment:** The Fair Wear audits of 2022 at one production location in Tunisia revealed that overtime premiums as well as allowances and benefits were not paid as legally required. Van Heurck started with the investigation and found out that two workers did not receive the overtime premiums as well as the allowances and benefits as legally required. In 2022, Van Heurck was in contact with Fair Wear to receive more details about the workers. Further remediation processes were therefore not initiated in 2022.

**Requirement:** Van Heurck is required to investigate further in that case. The member brand should prioritise the remediation for this finding in the following financial year.

**Recommendation:** Fair Wear strongly recommends Van Heurck to ensure problems of payments related to overtime premiums as well as allowances and benefits are not just prevented going forward but also remediated retroactively.

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

**Comment:** As described in indicator 2.16, Van Heurck has detailed knowledge about the labour prices at its own production locations. Van Heurck has an overview of the wage levels at its factories in Tunisia and knows the gap towards the estimated living wage. Van Heurck and its production locations work with a system towards living wages. In dialogue with the production locations, the brand added all kinds of bonuses to the wages to meet the target wage, which is above the CBA wage. All workers who worked a normal amount of time received the bonuses. Van Heurck, together with the factories, is increasing this target wage yearly.

**Recommendation:** Fair Wear encourages Van Heurck to discuss with its factories about different strategies to work towards higher wages. While bonuses are a way to positively stimulate and reward workers, a living wage is paid regardless of workers' performance. Van Heurck is recommended to develop a strategy to raise wages for all workers, going beyond bonuses. A first step could be to do a root cause analysis of why the wages are below the living wage. Fair Wear's local staff could offer support in this.



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

**Comment:** All production locations in Tunisia follow CBA remuneration schedules, which are confirmed in Fair Wear audits. Van Heurck implemented a bonus system based on production and quality. By increasing this bonus system, Van Heurck gradually wants to decrease the gap between minimum wages and living wages. In 2022, Van Heurck also paid higher minute prices to allow an increase in wages and bonuses as well.

**Recommendation:** Fair Wear recommends Van Heurck to absorb the extra payments in the wages. In this way the workers are not dependent on bonuses, which are more insecure in comparison to wages. A living wage is not a bonus, and Van Heurck should work on strategies to structurally pay a living wage to all workers, regardless of performance.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.13 Percentage of production volume where the member company pays its share of the living wage estimate.	99%	Fair Wear requires its member companies to act to ensure a living wage is paid in their production locations to each worker.	Member company's own documentation such as reports, factory documentation, evidence of Collective Bargaining Agreement (CBA) payment, communication with factories, etc.	6	6	0

**Comment:** The legal minimum wage in 2022 was 497 Tunisian Dinars (TD), and the estimated living wage was 850 TD. Van Heurck worked with a target wage, which is the CBA wage (556 TD net). In all three production factories, the wages are slightly higher than the CBA wage. In the coming years, the suppliers and Van Heurck will increase this target wage each year.

Van Heurck discussed the target wage with the other brands sourcing from the same suppliers. The other member brand agreed to also work with the target wage.

**Recommendation:** Fair Wear encourages Van Heurck to gradually increase the target wages for the coming years.

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

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

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.15 Degree to which member company implements training appropriate to the improvement or prevention programme.	Basic	Training programmes can play an important role in improving working conditions, especially for more complex issues, such as freedom of association or gender-based violence, where factory-level transformation is needed.	Links between the risk profile and training programme, documentation from discussions with management and workers on training needs, etc.	2	6	0

**Comment:** Van Heurck has some CAP findings where training is a recommended follow-up action. In the past year, all three production locations from Tunisia were enrolled in Fair Wear's WEP Basic module. The decision to provide training to its suppliers depends on the improvement and remediation plans based on audit results and complaints as well as the outcome of continuous monitoring. The brand's prevention programme does not yet include other training programmes.

**Recommendation:** Van Heurck is recommended to implement other training programmes for its factories where this is part of its improvement and prevention programme.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.16 Degree to which member company follows up after a training programme.	Intermediate	Training is a crucial tool to support transformative processes but complementary activities such as remediation and changes at the brand level are needed to achieve lasting impact	Evidence of engagement with factory management regarding training outcomes, documentation on follow-up activities, and proof of integration into further monitoring and risk profiling efforts.	4	6	0

**Comment:** Van Heurck followed up on the implemented training by adding relevant findings and outcomes of the training to the CAP follow-up. Van Heurck and the local staff in Tunisia discussed the training with the factory management afterwards. Due to the training report, Van Heurck decided to organise additional training for the CCC to support social dialogue in the production locations.

**Recommendation:** We encourage Van Heurck to expand its follow-up and to add outcomes of the training programmes to the risk assessment.

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

**Comment:** Van Heurck strives to have a consolidated supply chain with long-term business relationships. The member brand mainly works with its own production locations. Van Heurck's human rights risk monitoring includes a responsible exit strategy. When Van Heurck decides to exit, they agree with the production location about the exit strategy. In the responsible exit strategy, it is highlighted that Van Heurck informs the supplier as soon as the decision has been made, at least one season ahead, to allow the factory management to find new customers and orders to fill their capacities. The responsible exit strategy is part of Van Heurck's RBC policy, which was shared with all production locations.

In the past financial year, the member continued the business relationship with all of its production locations and subcontracting partners.

**Recommendation:** Fair Wear recommends that Van Heurck adapt the responsible exit strategy to its sourcing model. As Van Heurck owns the production locations and has high leverage in these production locations, Van Heurck should also take this into account in the responsible exit strategy.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
3.18 Member company's measures, business practices and/or improvement programmes go beyond the indicators or scope.	Member company's activities do not go beyond the indicators or scope.	Fair Wear would like to reward and encourage members who go beyond the Fair Wear policy or scope requirements. For example, innovative projects that result in advanced remediation strategies, pilot participation, and/or going beyond tier 2.	Overview of Human Right risk monitoring, remediation and prevention activities and processes.	N/A	6	0

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

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

**Possible Points: 18**

**Earned Points: 14**

### Indicators related to communication

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

**Comment:** [Van Heurck communicates accurately about Fair Wear membership on its website.](#)

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

**Comment:** Van Heurck does not sell external brands.

## Indicators related to brand and supply chain transparency

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

**Comment:** Van Heurck has submitted its social report, which Fair Wear approved.

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.4 Member company engages in advanced reporting activities.	Intermediate	Good reporting by members helps ensure the transparency of Fair Wear's work and helps share best practices within the industry. This indicator reviews transparency efforts reported beyond (or included in) the social report.	Brand Performance Check, audit reports, information about innovative projects, specific factory compliance data, disclosed production locations (list tier 2 and beyond), disclosure of production locations, alignment with the Transparency Pledge.	2	4	0



**Comment:** Van Heurck published the Brand Performance Check report and the Social report on its website. This information includes the name and address of the factory as well as audit results. Van Heurck also added (partly time-bound) improvement plans for its own production locations in Tunisia. The subcontracting partners are not added or disclosed in the social report.

**Recommendation:** Van Heurck is recommended to publish a complete factory list, with subcontracting partners included. Fair Wear also recommends Van Heurck extend its time-bound plans for its production locations.

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

**Comment:** Van Heurck has a system to track progress and check if implemented measures have effectively prevented and remediated human rights violations. The internal evaluation system involves top management. In its evaluation system, the member brand does involve factory management of its production locations in Tunisia but does not yet include triangulated information from external sources.

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

Performance indicators	Result	Relevance of indicator	Documentation	Score	Max	Min
4.6 Level of action/progress made on requirements from previous Brand Performance Check.	No requirements were included in the previous Brand Performance Check	In each Brand Performance Check report, Fair Wear may include requirements for changes to management practices. Progress on achieving these requirements is an important part of Fair Wear membership and its process approach.	Member should show documentation related to the specific requirements made in the previous Brand Performance Check.	N/A	4	-2

**Comment:** In the previous performance check, no requirements were included.

## 5 Appreciation chapter

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

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

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

## Recommendations to Fair Wear

In general, Van Heurck is positive about Fair Wear's data system and the tools that facilitate brands to implement the HRDD approach. Van Heurck also appreciated the cooperation with the brand liaison. Van Heurck also recommends Fair Wear to be more transparent about further developments within the membership. Van Heurck would like the Fair Wear label to be more known, especially for public procurement.

# Brand Performance Check details

Date of Brand Performance Check: **25-08-2023**

Conducted by: **Victoria Lauer**

Interviews with: **Els de Ridder (CSR Manager, VP Textile)**

**Dannielli Sloetmaekers (CSR Manager, Van Heurck)**

**Karen Vanroy (CSR Manager, Van Heurck)**

**Abdessalem Ben Abdallah (Quality Manager, Apparel@work)**