

## **Annex III<sup>1</sup>**

### **Letters from the Coalition to Responsible Business Initiatives**

1. amfori, June 25, 2018
2. Dutch Agreement on Sustainable Garments and Textiles, July 12, 2018
3. German Partnership on Sustainable Textiles, July 2, 2018
4. Fair Labor Association, June 11, 2018
5. Fair Wear Foundation, June 26, 2018
6. Sustainable Apparel Coalition, June 25, 2018
7. UK Ethical Trading Initiative, June 27, 2018
8. Sustainable Apparel Coalition, September 26, 2019

### **Letters from Responsible Business Initiatives to the Coalition (email correspondence is on file with the coalition)**

1. amfori, September 6, 2018
2. Dutch Agreement on Sustainable Garments and Textiles, September 21, 2018
3. German Partnership on Sustainable Textiles, July 31, 2018
4. Fair Wear Foundation, July 31, 2018, October 19, 2019, and November 27, 2019
5. Sustainable Apparel Coalition, July 28, 2018
6. UK Ethical Trading Initiative, August 3, 2018, October 29, 2019

### **Letters from Companies to the Coalition (email correspondence is on file with the coalition)**

1. Dare to Be, October 31, 2019
2. KappAhl, October 2, 2019
3. Kings of Indigo, November 11, 2019
4. Kuyichi, October 30, 2019

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<sup>1</sup> This Annex produces letters written by the coalition to companies and Responsible Business Initiatives (RBIs). It also produces responses sent by companies and RBIs to the coalition on their respective official letterhead. Email exchanges between companies, RBIs, and coalition representatives are on file with the coalition.

5. Okimono, November 6, 2019
6. WE Fashion, October 31, 2019
7. Zeeman, April 26, 2019
8. Amazon, August 30, 2018 and November 1, 2019

## **Letters from the Coalition to Amazon and Zalando**

1. Letter to Amazon, August 3, 2018
2. Letter to Zalando, August 3, 2018



June 25, 2018

Mr. Christian Ewert  
Director General  
Fair Trade Association  
via email: [REDACTED]

**Re: The Apparel and Footwear Supply Chain Transparency Pledge**

Dear Mr. Ewert:

Please accept our regards on behalf of the undersigned organizations.

We are writing to urge that amfori BSCI strengthen its policies concerning member companies' supply chain transparency, including making such disclosure a condition of membership for companies to continue being part of amfori BSCI. We are similarly writing to other key multi-stakeholder initiatives to request that they require supply chain transparency as part of their membership criteria, as well as through other incentives and disincentives.

We urge apparel and footwear companies to publicly disclose their supplier factories' lists and advocate that companies adopt the Apparel and Footwear Supply Chain Transparency Pledge (Transparency Pledge), a basic minimum standard drawn on industry good practice which we have collectively endorsed (attached in Appendix I).

Over the course of late 2016 and early 2017, we reached out to 72 companies asking them to publicly disclose their supplier factories list in alignment with the Transparency Pledge, of which at least 17 companies aligned with the Pledge. Our April 2017 report, [Follow the Thread: The](#)

[Need for Supply Chain Transparency in the Apparel and Footwear Industry](#), documents the results of our outreach and explains why we endorsed the Transparency Pledge.

We are pleased to note that amfori BSCI members Esprit and Adidas have aligned with the Transparency Pledge.<sup>1</sup> Other members such as Puma, Aldi, and Tchibo have taken steps in the right direction but need to make further progress.<sup>2</sup>

However, there is a big gap between companies that are leaders in the industry on supply chain transparency and others who have yet to take minimum steps to publicly disclose at least the names and physical addresses of supplier factories and authorized subcontractors. This reluctance reflects poorly on companies, especially as more than five years have passed since a series of calamitous factory disasters (including the Ali Enterprises factory fire, the Tazreen factory fire, and the Rana Plaza building collapse) demonstrated the pressing need for transparency.

In this context, we believe organizations like amfori BSCI should set strong, forward-looking policies that create incentives for industry leaders on transparency and disincentives for those who lag behind. One such disincentive is to create a clear deadline by which companies must disclose their supply chains or be removed from being part of amfori BSCI. We urge that January 2020 be set as the deadline for all amfori BSCI members to adopt and implement the Transparency Pledge.

We hope that amfori BSCI will take a strong position requiring minimum uniform standards for supply chain disclosure. We therefore urge amfori BSCI to take the following measures:

1. Make the public disclosure of supply chain information by January 2020, at a minimum in accordance with the Transparency Pledge, a condition of membership;
2. Endorse the Transparency Pledge and promote it publicly;
3. Urge amfori BSCI apparel and retail members through private discussions or letters to sign on to and implement the Transparency Pledge as an additional step toward greater transparency;
4. Between now and January 2020, publicly scorecard amfori BSCI members, on an annual basis, regarding the supply chain public disclosure efforts, including alignment with the Transparency Pledge;
5. Advise companies about the benefits of supply chain disclosure, including the sharing of best practices among brands themselves, as well as possible benefits through the swift flow of information to brands from local and global nongovernmental organizations and unions; and

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<sup>1</sup> For example, Adidas and Esprit are aligned with the Transparency Pledge. A letter was sent to each of these companies 2018 identifying their progress so far and noting areas where they can further improve.

<sup>2</sup> Puma, Aldi, Lidl, Tchibo, Hudson's Bay Company, and Decathlon, have started making some disclosures on their websites but need to do much more. A letter was sent to each of these companies in 2018 identifying their progress so far and requesting them to bring their practices in line with the Pledge requirements.

6. Encourage companies to deepen their transparency efforts beyond those set out in the Transparency Pledge.

We look forward to a written response from you as soon as possible, but no later than July 31, 2018, indicating the steps amfori BSCI will take, and by when, to implement the measures we have proposed above. All written responses may be sent to [transparency@hrw.org](mailto:transparency@hrw.org). Please note that all written responses, or lack thereof, will be reflected in our upcoming report, due to be published around the UN Forum for Business and Human Rights in 2018.

Best regards,

Aruna Kashyap, Senior Counsel, Human Rights Watch

Ineke Zeldenrust, Clean Clothes Campaign International Office, Clean Clothes Campaign

Judy Gearhart, Executive Director, International Labor Rights Forum

Lynda Yanz, Executive Director, Maquila Solidarity Network

Philip Jennings, General Secretary, UNI Global Union

Sarah McGrath, Legal & Policy Director, International Corporate Accountability Roundtable

Scott Nova, Executive Director, Worker Rights Consortium

Sharan Burrow, General Secretary, International Trade Union Confederation

Valter Sanches, General Secretary, IndustriALL Global Union

CC: Dr. Pierre Gröning, Director Advocacy, [REDACTED]

Mr. Franzis Wimmer, Stakeholder Engagement Coordinator, [REDACTED]

## Appendix I

### The Apparel and Footwear Supply Chain Transparency Pledge

#### ("The Transparency Pledge")

This Transparency Pledge helps demonstrate apparel and footwear companies' commitment towards greater transparency in their manufacturing supply chain.

Transparency of a company's manufacturing supply chain better enables a company to collaborate with civil society in identifying, assessing, and avoiding actual or potential adverse human rights impacts. This is a critical step that strengthens a company's human rights due diligence.

Each company participating in this Transparency Pledge commits to taking **at least** the following steps within three months of signing it:

#### **Publish Manufacturing Sites**

The company will publish on its website on a regular basis (such as twice a year) a list naming all sites that manufacture its products. The list should provide the following information in English:

1. The full name of all authorized production units and processing facilities.<sup>1</sup>
2. The site addresses.
3. The parent company of the business at the site.
4. Type of products made.<sup>2</sup>
5. Worker numbers at each site.<sup>3</sup>

Companies will publish the above information in a spreadsheet or other searchable format.

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<sup>1</sup> Processing factories include printing, embroidery, laundry, and so on.

<sup>2</sup> Please indicate the broad category – apparel, footwear, home textile, accessories.

<sup>3</sup> Please indicate whether the site falls under the following categories by number of workers: Less than 1000 workers; 1001 to 5000 workers; 5001 to 10,000 workers; More than 10,000 workers.



July 12, 2018

Mr. Jef Wintermans,  
Coordinator  
Agreement on Sustainable Garment and Textile  
via email: [REDACTED]

**Re: The Apparel and Footwear Supply Chain Transparency Pledge**

Dear Mr. Wintermans,

Please accept our regards on behalf of the undersigned organizations.

We are writing to urge that the Agreement on Sustainable Garment and Textile (the “Dutch Covenant”) strengthen its policies concerning member companies’ supply chain transparency, including making such disclosure a condition of membership for companies to continue being part of the Dutch Covenant. We are writing to key multi-stakeholder initiatives to document how they incentivize supply chain transparency, especially using their membership criteria, as well as any other incentives and disincentives they may create.

We urge apparel and footwear companies to publicly disclose their supplier factories’ lists and advocate that companies adopt the Apparel and Footwear Supply Chain Transparency Pledge (Transparency Pledge), a basic minimum standard drawn on industry good practice which we have collectively endorsed (attached in Appendix I).

Over the course of late 2016 and early 2017, we reached out to 72 companies asking them to publicly disclose their supplier factories list in alignment with the Transparency Pledge, of which at least 17 companies aligned with the Pledge. Our April 2017 report, [Follow the Thread: The Need for Supply Chain Transparency in the Apparel and Footwear Industry](#), documents the results of our outreach and explains why we endorsed the Transparency Pledge.

We are pleased to note that Esprit, C&A, and G-Star Raw—members of the Dutch Covenant—have aligned their supply chain disclosure practices with the Transparency Pledge. There is a big gap between companies that are leaders in the industry on supply chain transparency and others who have yet to take minimum steps to publicly disclose at least the names and physical addresses of supplier factories and authorized subcontractors. This reluctance reflects poorly on companies, especially as more than five years have passed since a series of calamitous factory disasters (including the Ali Enterprises factory fire, the Tazreen factory fire, and the Rana Plaza building collapse) demonstrated the pressing need for transparency.

In this context, we believe initiatives like the Dutch Covenant should set strong, forward-looking policies that create incentives for industry leaders on transparency and disincentives for those who lag behind. One such disincentive is to create a clear deadline by which companies must disclose their supply chains or be removed from being part of the Dutch Covenant. We urge that January 2020 be set as the deadline for all Dutch Covenant members to adopt and implement the Transparency Pledge.

We hope that the Dutch Covenant will take a strong position requiring minimum uniform standards for supply chain disclosure. We therefore urge the Dutch Covenant to take the following measures:

1. Make the public disclosure of supply chain information by January 2020, at a minimum in accordance with the Transparency Pledge, a condition of membership;
2. Endorse the Transparency Pledge and promote it publicly;
3. Urge Dutch Covenant members through private discussions or letters to sign on to and implement the Transparency Pledge as an additional step toward greater transparency;
4. Between now and January 2020, publicly scorecard Dutch Covenant member-companies, on an annual basis, regarding the supply chain public disclosure efforts, including alignment with the Transparency Pledge;
5. Advise companies about the benefits of supply chain disclosure, including the sharing of best practices among brands themselves, as well as possible benefits through the swift flow of information to brands from local and global nongovernmental organizations and unions; and
6. Encourage companies to deepen their transparency efforts beyond those set out in the Transparency Pledge.

We look forward to a written response from you as soon as possible, but no later than August 15, 2018, indicating the steps the Dutch Covenant will take, and by when, to implement the

measures we have proposed above. All written responses may be sent to [transparency@hrw.org](mailto:transparency@hrw.org). Please note that all written responses, or lack thereof, will be reflected in our upcoming report, due to be published around the UN Forum for Business and Human Rights in 2018.

Best regards,

Aruna Kashyap, Senior Counsel, Human Rights Watch

Christy Hoffman, General Secretary, UNI Global Union

Ineke Zeldenrust, Clean Clothes Campaign International Office, Clean Clothes Campaign

Judy Gearhart, Executive Director, International Labor Rights Forum

Jana Morgan, Campaigns and Advocacy Director, International Corporate Accountability Roundtable

Lynda Yanz, Executive Director, Maquila Solidarity Network

Scott Nova, Executive Director, Worker Rights Consortium

Sharan Burrow, General Secretary, International Trade Union Confederation

Valter Sanches, General Secretary, IndustriALL Global Union

## Appendix I

### The Apparel and Footwear Supply Chain Transparency Pledge

#### ("The Transparency Pledge")

This Transparency Pledge helps demonstrate apparel and footwear companies' commitment towards greater transparency in their manufacturing supply chain.

Transparency of a company's manufacturing supply chain better enables a company to collaborate with civil society in identifying, assessing, and avoiding actual or potential adverse human rights impacts. This is a critical step that strengthens a company's human rights due diligence.

Each company participating in this Transparency Pledge commits to taking **at least** the following steps within three months of signing it:

#### **Publish Manufacturing Sites**

The company will publish on its website on a regular basis (such as twice a year) a list naming all sites that manufacture its products. The list should provide the following information in English:

1. The full name of all authorized production units and processing facilities.<sup>1</sup>
2. The site addresses.
3. The parent company of the business at the site.
4. Type of products made.<sup>2</sup>
5. Worker numbers at each site.<sup>3</sup>

Companies will publish the above information in a spreadsheet or other searchable format.

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<sup>1</sup> Processing factories include printing, embroidery, laundry, and so on.

<sup>2</sup> Please indicate the broad category – apparel, footwear, home textile, accessories.

<sup>3</sup> Please indicate whether the site falls under the following categories by number of workers: Less than 1000 workers; 1001 to 5000 workers; 5001 to 10,000 workers; More than 10,000 workers.



July 2, 2018

Mr. Jürgen Janssen,  
Secretariat, Partnership for Sustainable Textiles

**Re: The Apparel and Footwear Supply Chain Transparency Pledge**

Dear Mr. Janssen,

Please accept our regards on behalf of the undersigned organizations.

We are writing to follow-up on our letter to the Partnership for Sustainable Textiles (“Partnership”) dated March 2, 2017 and the positive response dated March 17, 2017 (attached in Appendix). We appreciate the Partnership’s overall support for supply chain transparency and the Transparency Pledge and are writing to urge that the Partnership take additional concrete steps in furtherance of supply chain transparency. We are writing to key multi-stakeholder initiatives to document how they incentivize supply chain transparency, especially using their membership criteria, as well as any other incentives and disincentives they may create.

We urge apparel and footwear companies to publicly disclose their supplier factories’ lists and advocate that companies adopt the Apparel and Footwear Supply Chain Transparency Pledge (Transparency Pledge), a basic minimum standard drawn on industry good practice which we have collectively endorsed (attached in Appendix I). Our April 2017 report, [Follow the Thread: The Need for Supply Chain Transparency in the Apparel and Footwear Industry](#), documents the results of our outreach and explains why we endorsed the Transparency Pledge.

As the Partnership is aware, over the past decade a growing number of companies have taken proactive steps towards greater transparency by voluntarily disclosing to the public more information about their global suppliers. These include a number of Partnership members. These companies' actions have reinforced supply chain transparency as a recognized best practice in the global garment and footwear industry.

There is a big gap between companies that are leaders in the industry on supply chain transparency and others, including the Partnership's members, who have yet to take minimum steps to publicly disclose at least the names and physical addresses of supplier factories and authorized subcontractors. This reluctance reflects poorly on companies, especially as more than five years have passed since a series of calamitous factory disasters (including the Ali Enterprises factory fire, the Tazreen factory fire, and the Rana Plaza building collapse) demonstrated the pressing need for transparency.

In this context, we believe organizations like the Partnership should set strong, forward-looking policies that create incentives for industry leaders on transparency and disincentives for those who lag behind. One such disincentive is to create a clear deadline by which companies must disclose their supply chains or be removed from being part of the Partnership. We urge that January 2020 be set as the deadline for all Partnership members to adopt and implement the Transparency Pledge.

We hope that the Partnership will take a strong position requiring minimum uniform standards for supply chain disclosure. We therefore urge the Partnership to take the following measures:

1. Make the public disclosure of supply chain information by January 2020, at a minimum in accordance with the Transparency Pledge, a condition of membership;
2. Endorse the Transparency Pledge and promote it publicly;
3. Urge Partnership's apparel and retail members through private discussions or letters to sign on to and implement the Transparency Pledge as an additional step toward greater transparency;
4. Between now and January 2020, publicly scorecard Partnership's member-companies, on an annual basis, regarding the supply chain public disclosure efforts, including alignment with the Transparency Pledge;
5. Advise companies about the benefits of supply chain disclosure, including the sharing of best practices among brands themselves, as well as possible benefits through the swift flow of information to brands from local and global nongovernmental organizations and unions; and
6. Encourage companies to deepen their transparency efforts beyond those set out in the Transparency Pledge.

We look forward to a written response from you as soon as possible, but no later than July 31, 2018, indicating the steps the Partnership will take, and by when, to implement the measures we have proposed above. All written responses may be sent to [transparency@hrw.org](mailto:transparency@hrw.org). Please note that all written responses, or lack thereof, will be reflected in our upcoming report, due to be published around the UN Forum for Business and Human Rights in 2018.

Best regards,

Aruna Kashyap, Senior Counsel, Human Rights Watch

Ineke Zeldenrust, Clean Clothes Campaign International Office, Clean Clothes Campaign

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Valter Sanches, General Secretary, IndustriALL Global Union



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Dienststz Berlin, 11055 Berlin

Amol Mehra, Director, International Corporate Accountability  
Roundtable

Ineke Zeldenrust, Clean Clothes Campaign International Office,  
Clean Clothes Campaign

Janet Walsh, Acting Director, Women's Rights Division,  
Human Rights Watch

Judy Gearhart, Executive Director, International Labor Rights  
Forum

Lynda Yanz, Executive Director, Maquila Solidarity Network

Philip Jennings, General Secretary, UNI Global Union

Philip Jennings, General Secretary, UNI Global Union

Scott Nova, Executive Director, Worker Rights Consortium

Sharan Burrow, General Secretary, International Trade Union Confederation

Valter Sanches, General Secretary, IndustriALL Global Union

via e-mail

## Apparel and Footwear Supply Chain Transparency Pledge

Dear Ladies and Gentlemen,

Thank you for your letter of March 2<sup>nd</sup>, 2017. Let me emphasise that sustainability in global supply chains, and especially in the textile and garment sector, is a focus area of the German Federal Ministry for Economic Cooperation and Development. We are aware that transparency is a precondition in order to identify challenges along supply chains and to put into practice measures aiming at improving social and environmental conditions. Therefore, we appreciate and welcome initiatives such as the Apparel and Footwear Supply Chain Transparency Pledge.

We initiated the Partnership for Sustainable Textiles to promote labour, social and environmental standards throughout the textile supply chain as a whole. In the

**Dr. Bernhard Felmberg**

Leiter der Unterabteilung 11  
Zivilgesellschaft, Kirchen und Wirtschaft in  
der Entwicklungszusammenarbeit

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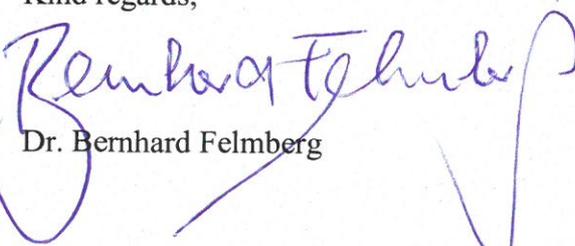
framework of this multi-stakeholder initiative, we jointly developed a set of requirements based on existing sustainability standards, which has to be pursued and implemented through members' individual roadmaps. This set of requirements also encourages the transparency of our members' supply chains. Furthermore, it rests with the member organisations to include the disclosure of their respective supply chain, including data concerning suppliers and sub-suppliers, in their individual roadmap.

We further elaborated a review process for measuring the progress of our members and the Partnership itself in achieving sustainability objectives and to report progress via a graduated transparency approach.

Beyond this all members of the Partnership for Sustainable Textiles are free to join further initiatives. From my perspective, the Apparel and Footwear Supply Chain Transparency Pledge might be particularly interesting for pioneers in the Partnership as your initiative allows to distinguish oneself positively from other actors in the market.

Therefore, I am positive that the Transparency Pledge and the Partnership for Sustainable Textiles will complement each other with regard to improvements of social and environmental conditions along the supply chain within the textile and garment sector.

Kind regards,



Dr. Bernhard Felmberg



HRW.org



international  
corporate  
accountability  
roundtable



WORKER RIGHTS  
CONSORTIUM



## Private Letter

March 2, 2017

Herr Dr. Felmberg  
Director

Directorate Civil Society; Churches and the Private Sector in Development Cooperation  
Federal Ministry for Economic Cooperation and Development of Germany (BMZ)  
via email: [REDACTED]

### **Re: Apparel and Footwear Supply Chain Transparency Pledge**

Dear Dr. Felmberg,

Please accept our regards on behalf of the undersigned organizations.

A key part of our ongoing work focuses on promoting transparency in garment and footwear supply chains. We are writing to seek the endorsement and support of the German Partnership for Sustainable Textiles (the "Partnership") for the Apparel and Footwear Supply Chain Transparency Pledge (the "Transparency Pledge"), which our organizations collectively developed. The Transparency Pledge is attached as an Appendix to this letter.

As you may be aware, in October representatives from our coalition wrote to some apparel and footwear brands and retailers that are members of the Partnership who do not currently publicly disclose any supply chain information, urging them to sign and implement the

Transparency Pledge.<sup>1</sup> Similarly, in November, we wrote to members who currently disclose supply chain information, acknowledging their leadership on transparency, and inviting them to sign the pledge.<sup>2</sup> In fact, Partnership members C&A and Esprit began disclosing their supplier information in 2016, after they joined the Partnership in 2014.

As you know, over the past decade a growing number of companies have taken proactive steps in being more transparent by voluntarily disclosing to the public more information about their global suppliers. These include adidas, C&A, Coles, Columbia, Cotton On, Disney, Esprit, Fruit of the Loom, Gap, G-Star RAW, H&M, Jeanswest, Kmart Australia, Levis, Lindex, Marks and Spencer, Mountain Equipment Co-op (MEC), New Balance, Nike, Patagonia, PUMA, Target USA, Target Australia, VF Corporation, and Woolworths.

Our initiative is working to build on the current momentum toward public disclosure of supply chain information in order to achieve some minimum standards in the quality and frequency of disclosures through the Transparency Pledge.

There are significant discrepancies in the quality and frequency of disclosures, and their traceability. For example, some companies appear to disclose all authorized manufacturing and processing units with location addresses; one or two companies go deeper in their disclosure to include fabric suppliers; while others disclose only a part of their tier-1 suppliers or only disclose a factory name and country of production. A few companies disclose worker numbers, gender breakdown, and other details for each factory. In most cases companies do not clearly state when the information was last updated and how often the disclosure is updated.

Our efforts to promote minimum standards among the members of the Partnership have had some positive results. We are pleased to have received positive responses from several members of the Partnership about their plans to publicly disclose additional supply chain information.<sup>3</sup> However, we are concerned to have received negative responses from other members of the Partnership, categorically refusing to publicly disclose any information about their supply chains.<sup>4</sup> For instance, Tchibo declined to disclose publicly, offering only to disclose privately to those organizations who have endorsed the pledge.

Where companies have engaged with the coalition with a willingness to publicly disclose, we have been flexible to accommodate reasonable extensions in order to allow them more time to collect additional pieces of information.

It has come to our attention from KiK that members of the Partnership have discussed supply chain disclosure and unfortunately reached negative conclusions. In its letter in response to our request, KiK stated that “[a]mongst all parties [of the Partnership] it was agreed, that the

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<sup>1</sup> ALDI, Hugo Boss, KiK, LIDL, Primark and Tchibo.

<sup>2</sup> adidas, C&A, Esprit, H&M, and Puma.

<sup>3</sup> At this writing, of the members that are part of the German Textile Partnership, adidas, C&A, and Esprit have committed to implementing the Transparency Pledge. Other companies like Hugo Boss have indicated that they will disclose information about their respective supply chains and we are awaiting more information.

<sup>4</sup> At this writing, Primark, ALDI, and KiK refused to publish information about their respective supply chains.

disclosure of all details regarding the suppliers' production and processing sites does not necessarily contribute to an improvement of working and living conditions in the respective countries.”

We are deeply concerned by this claim that agreement has been reached within the Partnership to disregard this growing trend in the industry toward greater supply chain transparency, including among its own brand members that have recently announced public supply chain disclosures. We hope that the Partnership will reconsider this position and promote minimum uniform standards. We hope that the Partnership will reconsider this position and promote minimum uniform standards in supply chain disclosure by encouraging its members to sign the Pledge. We urge the Partnership to take the following measures:

1. Endorse the Transparency Pledge;
2. Urge members of the Partnership through private discussions or letters to sign on to and implement the Transparency Pledge as a first step towards greater supply chain transparency;
3. Extend public support to the Transparency Pledge when we publicize our campaign goals in April 2017;
4. Include the Transparency Pledge within the indicator framework of the Partnership;
5. Advise companies about the benefits of supply chain disclosure, including the sharing of best practices among brands themselves, as well as possible benefits through the swift flow of information to brands from local and global non-governmental organizations and unions;
6. Make the disclosure of supply chain information, at a minimum in accordance with the Transparency Pledge, a condition for new Partnership membership; and
7. Encourage companies to increase supply chain transparency beyond the parameters set out in the Transparency Pledge.

We would welcome the commitment of the Partnership to work with us for greater supply chain transparency and to discuss with us the requested measures listed above. We look forward to a response from you soon, and by March 23, 2017 so that it can be reflected in our forthcoming published materials.

Best regards,

Amol Mehra, Director, International Corporate Accountability Roundtable

Ineke Zeldenrust, Clean Clothes Campaign International Office, Clean Clothes Campaign

Janet Walsh, Acting Director, Women's Rights Division, Human Rights Watch

Judy Gearhart, Executive Director, International Labor Rights Forum

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## Appendix

### Apparel and Footwear Supply Chain Transparency Pledge (“Transparency Pledge”)

This Transparency Pledge helps demonstrate apparel and footwear companies’ commitment towards greater transparency in their manufacturing supply chain.

Transparency of a company’s manufacturing supply chain better enables a company to collaborate with civil society in identifying, assessing, and avoiding actual or potential adverse human rights impacts. This is a critical step that strengthens a company’s human rights due diligence.

Each company participating in this Transparency Pledge commits to taking **at least** the following steps within three months of signing it:

#### **Publish Manufacturing Sites**

The company will publish on its website on a regular basis (such as twice a year) a list naming all sites that manufacture its products. The list should provide the following information in English:

1. The full name of all authorized production units and processing facilities.<sup>5</sup>
2. The site addresses.
3. The parent company of the business at the site.
4. Type of products made.<sup>6</sup>
5. Worker numbers at each site.<sup>7</sup>

Companies will publish the above information in a spreadsheet or other searchable format.

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<sup>5</sup> Processing factories include printing, embroidery, laundry, and so on.

<sup>6</sup> Please indicate the broad category – apparel, footwear, home textile, accessories.

<sup>7</sup> Please indicate whether the site falls under the following categories by number of workers: Less than 1000 workers; 1001 to 5000 workers; 5001 to 10,000 workers; More than 10,000 workers.



June 11, 2018

Ms. Sharon Waxman  
President and Chief Executive Officer  
The Fair Labor Association (FLA)  
via email: [REDACTED]

**Re: The Apparel and Footwear Supply Chain Transparency Pledge**

Dear Ms. Waxman,

Please accept our regards on behalf of the undersigned organizations.

We are writing to urge that the Fair Labor Association (FLA) strengthen its policies concerning member-companies' supply chain transparency, including making such disclosure a condition of membership for companies to continue being part of the FLA. We are similarly writing to other key multi-stakeholder initiatives to request that they require supply chain transparency as part of their membership criteria, as well as through other incentives and disincentives.

We urge apparel and footwear companies to publicly disclose their supplier factories' lists and advocate that companies adopt the Apparel and Footwear Supply Chain Transparency Pledge (Transparency Pledge), a basic minimum standard drawn on industry good practice which we have collectively endorsed (attached in Appendix I).

Over the course of late 2016 and early 2017, we reached out to 72 companies asking them to publicly disclose their supplier factories list in alignment with the Transparency Pledge, of which at least 17 companies aligned with the Pledge. Our April 2017 report, [Follow the Thread: The](#)

[Need for Supply Chain Transparency in the Apparel and Footwear Industry](#), documents the results of our outreach and explains why we endorsed the Transparency Pledge.

We are pleased to note that a number of FLA members, including adidas, Mountain Equipment Co-op (MEC), Nike, and Patagonia, have aligned with the Transparency Pledge.<sup>1</sup> Other members need to make further progress.<sup>2</sup>

However, there is a big gap between companies that are leaders in the industry on supply chain transparency and others who have yet to take minimum steps to publicly disclose at least the names and physical addresses of supplier factories and authorized subcontractors. This reluctance reflects poorly on companies, especially as more than five years have passed since a series of calamitous factory disasters (including the Ali Enterprises factory fire, the Tazreen factory fire, and the Rana Plaza building collapse) demonstrated the pressing need for transparency.

In this context, we believe organizations like the FLA should set strong, forward-looking policies that create incentives for industry leaders on transparency and disincentives for those who lag behind. One such disincentive is to create a clear deadline by which companies must disclose their supply chains or be removed from being part of the FLA. We urge that January 2020 be set as the deadline for all FLA members to adopt and implement the Transparency Pledge.

We hope that the FLA will take a strong position requiring minimum uniform standards for supply chain disclosure. We therefore urge the FLA to take the following measures:

1. Make the public disclosure of supply chain information by January 2020, at a minimum in accordance with the Transparency Pledge, a condition for all FLA participating companies and collegiate licensees;
2. Endorse the Transparency Pledge and promote it publicly;
3. Urge FLA apparel and retail participating companies and collegiate licensees through private discussions or letters to sign on to and implement the Transparency Pledge as an additional step toward greater transparency;
4. Between now and January 2020, publicly scorecard all FLA participating companies and collegiate licensees, on an annual basis, regarding the supply chain public disclosure efforts, including alignment with the Transparency Pledge;
5. Advise companies about the benefits of supply chain disclosure, including the sharing of best practices among brands themselves, as well as possible benefits through the swift

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<sup>1</sup> For example, adidas, Hanesbrands, Mountain Equipment Co-op (MEC), Nike, and Patagonia are aligned with the Transparency Pledge. A letter was sent to each of these companies in 2018 identifying their progress so far and noting areas where they can further improve.

<sup>2</sup> New Balance, Puma were already disclosing their supplier factories at the time the coalition first wrote to them and can make more progress. Fast Retailing, Under Armour, and PVH Corporation have begun making disclosures since the coalition wrote to them but can make more progress. A letter was sent to each of these companies in 2018 identifying their progress so far and requesting them to bring their practices in line with the Pledge requirements.

flow of information to brands from local and global nongovernmental organizations and unions; and

6. Encourage participating companies and collegiate licensees to deepen their transparency efforts beyond those set out in the Transparency Pledge.

We look forward to a written response from you as soon as possible, but no later than July 31, 2018, indicating the steps the FLA will take, and by when, to implement the measures we have proposed above. All written responses may be sent to [transparency@hrw.org](mailto:transparency@hrw.org). Please note that all written responses, or lack thereof, will be reflected in our upcoming report due to be published around the UN Forum for Business and Human Rights in 2018.

Best regards,

Aruna Kashyap, Senior Counsel, Human Rights Watch

Ineke Zeldenrust, Clean Clothes Campaign International Office, Clean Clothes Campaign

Judy Gearhart, Executive Director, International Labor Rights Forum

Lynda Yanz, Executive Director, Maquila Solidarity Network

Philip Jennings, General Secretary, UNI Global Union

Sarah McGrath, Legal & Policy Director, International Corporate Accountability Roundtable

Scott Nova, Executive Director, Worker Rights Consortium

Sharan Burrow, General Secretary, International Trade Union Confederation

Valter Sanches, General Secretary, IndustriALL Global Union

CC: Michael Posner, Chair of the Board of Directors, [REDACTED]

Shelly Han, Director of Civil Society Engagement, [REDACTED]

Harvey Chan, Chief Accountability and Innovation Officer, [REDACTED]

Eric Biel, Senior Advisor, [REDACTED]

## Appendix I

### The Apparel and Footwear Supply Chain Transparency Pledge

#### ("The Transparency Pledge")

This Transparency Pledge helps demonstrate apparel and footwear companies' commitment towards greater transparency in their manufacturing supply chains.

Transparency of a company's manufacturing supply chain better enables a company to collaborate with civil society in identifying, assessing, and avoiding actual or potential adverse human rights impacts. This is a critical step that strengthens a company's human rights due diligence.

Each company participating in this Transparency Pledge commits to taking **at least** the following steps within three months of signing it:

#### **Publish Manufacturing Sites**

The company will publish on its website on a regular basis (such as twice a year) a list naming all sites that manufacture its products. The list should provide the following information in English:

1. The full name of all authorized production units and processing facilities.<sup>1</sup>
2. The site addresses.
3. The parent company of the business at the site.
4. Type of products made.<sup>2</sup>
5. Worker numbers at each site.<sup>3</sup>

Companies will publish the above information in a spreadsheet or other searchable format.

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<sup>1</sup> Processing factories include printing, embroidery, laundry, and so on.

<sup>2</sup> Please indicate the broad category—apparel, footwear, home textile, accessories.

<sup>3</sup> Please indicate whether the site falls under the following categories by number of workers: Less than 1000 workers; 1001 to 5000 workers; 5001 to 10,000 workers; More than 10,000 workers.



June 26, 2018

Mr. Alexander Kohnstamm  
Executive Director  
Fair Wear Foundation (FWF)  
via email: [REDACTED]

**Re: The Apparel and Footwear Supply Chain Transparency Pledge**

Dear Mr. Kohnstamm,

Please accept our regards on behalf of the undersigned organizations.

We are writing to urge that the Fair Wear Foundation (FWF) strengthen its policies concerning member companies' supply chain transparency, including making such disclosure a condition of membership for companies to continue being part of the FWF. We are writing to key multi-stakeholder initiatives to document how they incentivize supply chain transparency, especially using their membership criteria, as well as any other incentives and disincentives they may create.

We urge apparel and footwear companies to publicly disclose their supplier factories' lists and advocate that companies adopt the Apparel and Footwear Supply Chain Transparency Pledge (Transparency Pledge), a basic minimum standard drawn on industry good practice which we have collectively endorsed (attached in Appendix I).

Over the course of late 2016 and early 2017, we reached out to 72 companies asking them to publicly disclose their supplier factories list in alignment with the Transparency Pledge, of which at least 17 companies aligned with the Pledge. Our April 2017 report, [Follow the Thread: The Need for Supply](#)

[Chain Transparency in the Apparel and Footwear Industry](#), documents the results of our outreach and explains why we endorsed the Transparency Pledge.

There is a big gap between companies that are leaders in the industry on supply chain transparency and others who have yet to take minimum steps to publicly disclose at least the names and physical addresses of supplier factories and authorized subcontractors. This reluctance reflects poorly on companies, especially as more than five years have passed since a series of calamitous factory disasters (including the Ali Enterprises factory fire, the Tazreen factory fire, and the Rana Plaza building collapse) demonstrated the pressing need for transparency.

In this context, we believe organizations like the FWF should set strong, forward-looking policies that create incentives for industry leaders on transparency and disincentives for those who lag behind. One such disincentive is to create a clear deadline by which companies must disclose their supply chains or be removed from being part of the FWF. We urge that January 2020 be set as the deadline for all FWF members to adopt and implement the Transparency Pledge.

We hope that the FWF will take a strong position requiring minimum uniform standards for supply chain disclosure. We therefore urge the FWF to take the following measures:

1. Make the public disclosure of supply chain information by January 2020, at a minimum in accordance with the Transparency Pledge, a condition of membership;
2. Endorse the Transparency Pledge and promote it publicly;
3. Urge FWF's apparel and retail members through private discussions or letters to sign on to and implement the Transparency Pledge as an additional step toward greater transparency;
4. Between now and January 2020, publicly scorecard FWF's member-companies, on an annual basis, regarding the supply chain public disclosure efforts, including alignment with the Transparency Pledge;
5. Advise companies about the benefits of supply chain disclosure, including the sharing of best practices among brands themselves, as well as possible benefits through the swift flow of information to brands from local and global nongovernmental organizations and unions; and
6. Encourage companies to deepen their transparency efforts beyond those set out in the Transparency Pledge.

We look forward to a written response from you as soon as possible, but no later than July 31, 2018, indicating the steps the FWF will take, and by when, to implement the measures we have proposed above. All written responses may be sent to [transparency@hrw.org](mailto:transparency@hrw.org). Please note that all written responses, or lack thereof, will be reflected in our upcoming report, due to be published around the UN Forum for Business and Human Rights in 2018.

Best regards,

Aruna Kashyap, Senior Counsel, Human Rights Watch

Ineke Zeldenrust, Clean Clothes Campaign International Office, Clean Clothes Campaign

Judy Gearhart, Executive Director, International Labor Rights Forum

Lynda Yanz, Executive Director, Maquila Solidarity Network

Philip Jennings, General Secretary, UNI Global Union

Sarah McGrath, Legal & Policy Director, International Corporate Accountability Roundtable

Scott Nova, Executive Director, Worker Rights Consortium

Sharan Burrow, General Secretary, International Trade Union Confederation

Valter Sanches, General Secretary, IndustriALL Global Union

## Appendix I

### The Apparel and Footwear Supply Chain Transparency Pledge

#### (“The Transparency Pledge”)

This Transparency Pledge helps demonstrate apparel and footwear companies’ commitment towards greater transparency in their manufacturing supply chain.

Transparency of a company’s manufacturing supply chain better enables a company to collaborate with civil society in identifying, assessing, and avoiding actual or potential adverse human rights impacts. This is a critical step that strengthens a company’s human rights due diligence.

Each company participating in this Transparency Pledge commits to taking **at least** the following steps within three months of signing it:

#### **Publish Manufacturing Sites**

The company will publish on its website on a regular basis (such as twice a year) a list naming all sites that manufacture its products. The list should provide the following information in English:

1. The full name of all authorized production units and processing facilities.<sup>1</sup>
2. The site addresses.
3. The parent company of the business at the site.
4. Type of products made.<sup>2</sup>
5. Worker numbers at each site.<sup>3</sup>

Companies will publish the above information in a spreadsheet or other searchable format.

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<sup>1</sup> Processing factories include printing, embroidery, laundry, and so on.

<sup>2</sup> Please indicate the broad category – apparel, footwear, home textile, accessories.

<sup>3</sup> Please indicate whether the site falls under the following categories by number of workers: Less than 1000 workers; 1001 to 5000 workers; 5001 to 10,000 workers; More than 10,000 workers.



June 25, 2018

Mr. Baptiste Carriere-Pradal  
Vice President  
Sustainable Apparel Coalition (SAC)  
Via email: [REDACTED]

**Re: The Apparel and Footwear Supply Chain Transparency Pledge**

Dear Mr. Carriere-Pradal,

Please accept our regards on behalf of the undersigned organizations.

We are writing to urge that the Sustainable Apparel Coalition (SAC) strengthen its policies concerning member companies' supply chain transparency, including making such disclosure a condition of membership for companies to continue being part of the SAC. We are writing to key multi-stakeholder initiatives to document how they incentivize supply chain transparency, especially using their membership criteria, as well as any other incentives and disincentives they may create.

We urge apparel and footwear companies to publicly disclose their supplier factories' lists and advocate that companies adopt the Apparel and Footwear Supply Chain Transparency Pledge (Transparency Pledge), a basic minimum standard drawn on industry good practice which we have collectively endorsed (attached in Appendix I).

Over the course of late 2016 and early 2017, we reached out to 72 companies asking them to publicly disclose their supplier factories list in alignment with the Transparency Pledge, of which at least 17 companies aligned with the Pledge. Our April 2017 report, [Follow the Thread: The Need for Supply Chain Transparency in the Apparel and Footwear Industry](#), documents the results of our outreach and explains why we endorsed the Transparency Pledge.

We are pleased to note that numerous SAC members, including adidas, ASICS, ASOS, C&A, Esprit, G-Star RAW, H&M, Levi Strauss, and Nike have fully aligned with the Transparency Pledge. SAC members Gap and Marks and Spencer have updated their practices and are very close to meeting the Pledge standard but are not fully aligned. Other members, including Benetton, Fast Retailing, and Primark have taken steps in the right direction but need to make further progress.<sup>1</sup>

However, there is a big gap between companies that are leaders in the industry on supply chain transparency and others who have yet to take minimum steps to publicly disclose at least the names and physical addresses of supplier factories and authorized subcontractors. This reluctance reflects poorly on companies, especially as more than five years have passed since a series of calamitous factory disasters (including the Ali Enterprises factory fire, the Tazreen factory fire, and the Rana Plaza building collapse) demonstrated the pressing need for transparency.<sup>2</sup>

In this context, we believe organizations like the SAC should set strong, forward-looking policies that create incentives for industry leaders on transparency and disincentives for those who lag behind. One such disincentive is to create a clear deadline by which companies must disclose their supply chains or be removed from being part of the SAC. We urge that January 2020 be set as the deadline for all SAC members to adopt and implement the Transparency Pledge.

We hope that the SAC will take a strong position requiring minimum uniform standards for supply chain disclosure. We therefore urge the SAC to take the following measures:

1. Make the public disclosure of supply chain information by January 2020, at a minimum in accordance with the Transparency Pledge, a condition of membership;
2. Endorse the Transparency Pledge and promote it publicly;

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<sup>1</sup> For a full list of all companies approached by the coalition and how their transparency practices aligned with the Transparency Pledge as on April 2017, please see [Follow the Thread: The Need for Supply Chain Transparency in the Apparel and Footwear Industry](#). Since the launch of the report, Primark has disclosed its supplier factories in 2018. Further improvements made by companies and newer disclosures, if any, will be published in November 2018.

<sup>2</sup> For example, Walmart and American Eagle Outfitters have thus far refused to publish information about supplier factories. Inditex has declined to disclose publicly, offering only to disclose privately to those organizations that have developed the Pledge.

3. Urge SAC apparel and retail members through private discussions or letters to sign on to and implement the Transparency Pledge as an additional step toward greater transparency;
4. Between now and January 2020, publicly scorecard SAC members, on an annual basis, regarding the supply chain public disclosure efforts, including alignment with the Transparency Pledge;
5. Advise companies about the benefits of supply chain disclosure, including the sharing of best practices among brands themselves, as well as possible benefits through the swift flow of information to brands from local and global nongovernmental organizations and unions; and
6. Encourage companies to deepen their transparency efforts beyond those set out in the Transparency Pledge.

We look forward to a written response from you as soon as possible, but no later than July 31, 2018, indicating the steps SAC will take, and by when, to implement the measures we have proposed above. All written responses may be sent to [transparency@hrw.org](mailto:transparency@hrw.org). Please note that all written responses, or lack thereof, will be reflected in our upcoming report, due to be published around the UN Forum for Business and Human Rights in 2018.

Best regards,

Aruna Kashyap, Senior Counsel, Human Rights Watch

Ineke Zeldenrust, Clean Clothes Campaign International Office, Clean Clothes Campaign

Judy Gearhart, Executive Director, International Labor Rights Forum

Lynda Yanz, Executive Director, Maquila Solidarity Network

Philip Jennings, General Secretary, UNI Global Union

Sarah McGrath, Legal & Policy Director, International Corporate Accountability Roundtable

Scott Nova, Executive Director, Worker Rights Consortium

Sharan Burrow, General Secretary, International Trade Union Confederation

Valter Sanches, General Secretary, IndustriALL Global Union

## Appendix I

### The Apparel and Footwear Supply Chain Transparency Pledge

#### ("The Transparency Pledge")

This Transparency Pledge helps demonstrate apparel and footwear companies' commitment towards greater transparency in their manufacturing supply chain.

Transparency of a company's manufacturing supply chain better enables a company to collaborate with civil society in identifying, assessing, and avoiding actual or potential adverse human rights impacts. This is a critical step that strengthens a company's human rights due diligence.

Each company participating in this Transparency Pledge commits to taking **at least** the following steps within three months of signing it:

#### **Publish Manufacturing Sites**

The company will publish on its website on a regular basis (such as twice a year) a list naming all sites that manufacture its products. The list should provide the following information in English:

1. The full name of all authorized production units and processing facilities.<sup>1</sup>
2. The site addresses.
3. The parent company of the business at the site.
4. Type of products made.<sup>2</sup>
5. Worker numbers at each site.<sup>3</sup>

Companies will publish the above information in a spreadsheet or other searchable format.

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<sup>1</sup> Processing factories include printing, embroidery, laundry, and so on.

<sup>2</sup> Please indicate the broad category – apparel, footwear, home textile, accessories.

<sup>3</sup> Please indicate whether the site falls under the following categories by number of workers: Less than 1000 workers; 1001 to 5000 workers; 5001 to 10,000 workers; More than 10,000 workers.



June 27, 2018

Mr. Peter McAllister  
Ethical Trading Initiative (ETI)  
via email: [REDACTED]

**Re: The Apparel and Footwear Supply Chain Transparency Pledge**

Dear Mr. McAllister,

Please accept our regards on behalf of the undersigned organizations.

We are writing to urge that the Ethical Trading Initiative (ETI) strengthen its policies concerning member companies' supply chain transparency, including making such disclosure a condition of membership for companies to continue being part of the ETI. We are writing to key multi-stakeholder initiatives to document how they incentivize supply chain transparency, especially using their membership criteria, as well as any other incentives and disincentives they may create.

This letter is a follow-up to our earlier letter dated December 14, 2016 (attached in Appendix). We urge apparel and footwear companies to publicly disclose their supplier factories' lists and advocate that companies adopt the Apparel and Footwear Supply Chain Transparency Pledge (Transparency Pledge), a basic minimum standard drawn on industry good practice which we have collectively endorsed (attached in Appendix I). Our April 2017 report, [Follow the Thread: The Need for Supply Chain Transparency in the Apparel and Footwear Industry](#), documents the results of our outreach and explains why we endorsed the Transparency Pledge.

As the ETI is aware, over the past decade a growing number of companies have taken proactive steps towards greater transparency by voluntarily disclosing to the public information about their global supplier factories. These include a number of ETI's members.<sup>1</sup> Most recently, Primark, an ETI board member, began publicly disclosing its supplier factories' names and addresses in February 2018. These companies' actions have reinforced supply chain transparency as a recognized best practice in the global garment and footwear industry.

There is a big gap between companies that are leaders in the industry on supply chain transparency and others, including ETI's members, who have yet to take minimum steps to publicly disclose at least the names and physical addresses of supplier factories and authorized subcontractors. This reluctance reflects poorly on companies, especially as more than five years have passed since a series of calamitous factory disasters (including the Ali Enterprises factory fire, the Tazreen factory fire, and the Rana Plaza building collapse) demonstrated the pressing need for transparency.

In this context, we believe organizations like the ETI should set strong, forward-looking policies that create incentives for industry leaders on transparency and disincentives for those who lag behind. One such disincentive is to create a clear deadline by which companies must disclose their supply chains or be removed from being part of the ETI. We urge that January 2020 be set as the deadline for all ETI members to adopt and implement the Transparency Pledge.

We hope that the ETI will take a strong position requiring minimum uniform standards for supply chain disclosure. We therefore urge the ETI to take the following measures:

1. Make the public disclosure of supply chain information by January 2020, at a minimum in accordance with the Transparency Pledge, a condition of membership;
2. Endorse the Transparency Pledge and promote it publicly;
3. Urge ETI's apparel and retail members through private discussions or letters to sign on to and implement the Transparency Pledge as an additional step toward greater transparency;
4. Between now and January 2020, publicly scorecard ETI's member-companies, on an annual basis, regarding the supply chain public disclosure efforts, including alignment with the Transparency Pledge;
5. Advise companies about the benefits of supply chain disclosure, including the sharing of best practices among brands themselves, as well as possible benefits through the swift flow of information to brands from local and global nongovernmental organizations and unions; and
6. Encourage companies to deepen their transparency efforts beyond those set out in the Transparency Pledge.

We look forward to a written response from you as soon as possible, but no later than July 31, 2018, indicating the steps the ETI will take, and by when, to implement the measures we have proposed

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<sup>1</sup> For a list of all ETI members who have aligned with the Transparency Pledge as of April 2017, see [Follow the Thread: The Need for Supply Chain Transparency in the Apparel and Footwear Industry](#).

above. All written responses may be sent to [transparency@hrw.org](mailto:transparency@hrw.org). Please note that all written responses, or lack thereof, will be reflected in our upcoming report, due to be published around the UN Forum for Business and Human Rights in 2018.

Best regards,

Aruna Kashyap, Senior Counsel, Human Rights Watch

Ineke Zeldenrust, Clean Clothes Campaign International Office, Clean Clothes Campaign

Judy Gearhart, Executive Director, International Labor Rights Forum

Lynda Yanz, Executive Director, Maquila Solidarity Network

Philip Jennings, General Secretary, UNI Global Union

Sarah McGrath, Legal & Policy Director, International Corporate Accountability Roundtable

Scott Nova, Executive Director, Worker Rights Consortium

Sharan Burrow, General Secretary, International Trade Union Confederation

Valter Sanches, General Secretary, IndustriALL Global Union

## APPENDIX



December 14, 2016

Mr. Peter McAllister  
Director  
Ethical Trading Initiative (ETI)  
Email: [REDACTED]

### Re: The Apparel and Footwear Supply Chain Transparency Pledge

Dear Mr. McAllister,

Please accept our regards on behalf of the undersigned organizations.

A key part of our ongoing work focuses on promoting transparency in garment and footwear supply chains. We have regularly urged companies to disclose their supplier lists. We are writing to seek ETI's endorsement and support for the Apparel and Footwear Supply Chain Transparency Pledge (Transparency Pledge), which we collectively endorse. The Transparency Pledge is in Appendix I to this letter.

A number of apparel and footwear brands and retailers are members of ETI, and ETI plays an important role influencing their approaches to human rights due diligence. As you are aware, in October representatives from our group wrote to some ETI members who do not currently publicly disclose any supply chain information, urging them to sign and implement the Transparency Pledge.<sup>1</sup> Similarly, in November, we wrote to members who currently disclose

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<sup>1</sup> Primark, NEXT, New Look, John Lewis, the Pentland Group, ASOS, River Island Clothing, Tesco, Debenhams, Sainsbury, Inditex, Tchibo, and BESTSELLER.

supply chain information, acknowledging their leadership on transparency, and inviting them to sign the pledge.<sup>2</sup>

As ETI is well aware, over the past decade a growing number of companies have taken proactive steps in being more transparent by voluntarily disclosing to the public more information about their global suppliers. These include adidas, C&A, Coles, Columbia, Cotton On, Disney, Esprit, Fruit of the Loom, Gap, G-Star RAW, H&M, Jeanswest, Kmart Australia, Levis, Lindex, Marks and Spencer, Mountain Equipment Co-op (MEC), New Balance, Nike, Patagonia, PUMA, Target USA, Target Australia, VF Corporation, and Woolworths.

In 2016, at least six companies – Gap, Marks and Spencer, VF Corp, Esprit, C&A and Jeanswest – began to disclose information about their supply chains. These companies' actions have reinforced supply chain transparency as a recognized best practice in the global garment and footwear industry.

Our effort is to build on the current momentum toward public disclosure of supply chain information and strive toward some minimum standards in the quality and frequency of disclosures through the Transparency Pledge.

There are significant discrepancies in the quality and frequency of disclosures, and their searchability. For example, some companies appear to disclose all authorized manufacturing and processing units with location addresses; one or two companies go deeper in their disclosure to include fabric suppliers; while some others disclose only a part of their tier-1 suppliers or only disclose a factory name and country of production. A few companies disclose worker numbers, gender breakdown, and other details for every factory. In most cases companies do not clearly state when the information was last updated and how often the disclosure is updated.

Our efforts to promote minimum standards among ETI members have had some positive results. We are pleased to see positive responses from a number of ETI members and their plans to publicly disclose.<sup>3</sup> But we are equally dismayed to get negative responses from others, categorically refusing to publicly disclose any information about their supply chains.<sup>4</sup> Inditex and Tchibo declined to disclose publicly, offering only to disclose privately to those organizations who have developed the pledge. One ETI member-company has not responded to our letter.<sup>5</sup>

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<sup>2</sup> C&A, Gap, H&M, and Marks and Spencer.

<sup>3</sup> At this writing, NEXT and the Pentland Group have signed the Transparency Pledge. Other companies like ASOS have committed to signing and implementing the pledge orally and we are awaiting a formal response. John Lewis has similarly agreed to sign the Transparency Pledge but expressed concerns about disclosing parent company information, which other companies are collecting.

<sup>4</sup> Primark, Morrisons, and Sainsbury refused to publish information about the supply chain.

<sup>5</sup> At this writing, River Island has yet to respond to our letter.

Where companies have engaged with the group with a willingness to publicly disclose, we have been flexible to accommodate reasonable extensions to allow them more time to collect additional pieces of information.

We commend ETI for integrating transparency as an important part of the ETI 2020 Strategy. We hope ETI can partner with us in promoting minimum uniform standards in supply chain disclosure. We urge ETI to take the following measures:

1. Endorse the Transparency Pledge;
2. Urge ETI apparel and retail members through private discussions or letters to sign on to and implement the Transparency Pledge as a first step toward greater transparency;
3. Extend public support to the Transparency Pledge when we publicize our campaign goals in late March 2017;
4. Publicly scorecard, on an annual basis, the supply chain transparency (i.e. public disclosure) efforts of ETI members, including the Transparency Pledge as part of the scorecard;
5. Integrate recommendations to publish supplier information into ETI's advisory work on compliance with the UK Modern Slavery Act;
6. Advise companies about the benefits of supply chain disclosure, including the sharing of best practices among brands themselves, as well as possible benefits through the swift flow of information to brands from local and global nongovernmental organizations and unions;
7. Make the disclosure of supply chain information, at a minimum in accordance Transparency Pledge, a condition for moving from foundation to full membership; and
8. Encourage companies to deepen their transparency efforts beyond those set out in the Transparency Pledge.

We would welcome ETI's commitment to work with us for greater transparency and to discuss with us the steps listed above. We look forward to a written response from you as soon as possible, but no later than March 1, 2017. All written responses will be reflected in our respective published materials.

Best regards,

Amol Mehra, Director, International Corporate Accountability Roundtable

Ineke Zeldenrust, Clean Clothes Campaign International Office, Clean Clothes Campaign

Janet Walsh, Acting Director, Women's Rights Division, Human Rights Watch

Judy Gearhart, Executive Director, International Labor Rights Forum

Lynda Yanz, Executive Director, Maquila Solidarity Network

Philip Jennings, General Secretary, UNI Global Union

Scott Nova, Executive Director, Worker Rights Consortium

Sharan Burrow, General Secretary, International Trade Union Confederation

Valter Sanches, General Secretary, IndustriALL Global Union

## Appendix I

### The Apparel and Footwear Supply Chain Transparency Pledge

#### ("The Transparency Pledge")

This Transparency Pledge helps demonstrate apparel and footwear companies' commitment towards greater transparency in their manufacturing supply chain.

Transparency of a company's manufacturing supply chain better enables a company to collaborate with civil society in identifying, assessing, and avoiding actual or potential adverse human rights impacts. This is a critical step that strengthens a company's human rights due diligence.

Each company participating in this Transparency Pledge commits to taking **at least** the following steps within three months of signing it:

#### **Publish Manufacturing Sites**

The company will publish on its website on a regular basis (such as twice a year) a list naming all sites that manufacture its products. The list should provide the following information in English:

1. The full name of all authorized production units and processing facilities.<sup>1</sup>
2. The site addresses.
3. The parent company of the business at the site.
4. Type of products made.<sup>2</sup>
5. Worker numbers at each site.<sup>3</sup>

Companies will publish the above information in a spreadsheet or other searchable format.

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<sup>1</sup> Processing factories include printing, embroidery, laundry, and so on.

<sup>2</sup> Please indicate the broad category – apparel, footwear, home textile, accessories.

<sup>3</sup> Please indicate whether the site falls under the following categories by number of workers: Less than 1000 workers; 1001 to 5000 workers; 5001 to 10,000 workers; More than 10,000 workers.



September 26, 2019

Mr. Sean Cady  
Board Chair  
Sustainable Apparel Coalition  
Vice President, Global Supply Chain and Responsible Sourcing VF Corporation  
via email: [REDACTED]

**Re: The Apparel and Footwear Supply Chain Transparency Pledge**

Dear Mr. Sean Cady,

Please accept our regards on behalf of the undersigned organizations.

We are writing to follow up on our June 2018 communication to the Sustainable Apparel Coalition (SAC) and urge the SAC board to expedite decisions on supply chain transparency of its corporate members.

We are deeply concerned that more than a year has passed since we first wrote to the SAC, but the SAC has yet to take any concrete measures toward requiring its members to

publicly disclose their supplier factories' lists on their respective websites. The SAC board members include representatives of brands that are among the apparel industry's leaders on supply chain transparency and we firmly believe this agenda should receive high and urgent priority for reform.

Other industry-backed multistakeholder initiatives (MSIs) have begun to make inroads toward requiring their members to become transparent. The board of the Fair Labor Association, an MSI whose membership includes not only apparel brands and retailers but also suppliers, voted in February 2019 that its members must publicly disclose their first-tier suppliers. Our preliminary research indicates that at the time the FLA took this decision, about 45 percent of its brand and retailer members were already disclosing their supplier factories list.<sup>1</sup>

The SAC is similarly placed. About 40 to 45 percent of the SAC's brand and retailer members are already publishing information about their supply chains on their respective websites. Many of SAC's members have supply chain transparency practices that are already aligned with the Transparency Pledge. At this writing, these include adidas, ASICS, Esprit, G-Star RAW, H&M, Levi's, Nike, Patagonia, and VF Corp.

The UK Ethical Trading Initiative (ETI), which appears to have fewer apparel company-members that publish their supplier factories list when compared with the SAC, has also taken steps towards integrating transparency into its membership requirement for companies. About 33 percent of the ETI's full-stage apparel and footwear brands and retailers publish their supplier factories lists. In June 2019, the ETI board decided to integrate supply chain transparency requirements for its member companies.

We understand that roll-out of the SAC's Brand and Retail Module has been delayed. We do not believe the delay in developing and rolling out the Brand and Retail Module is justification for delaying board decisions on supply chain transparency. The FLA and the UK ETI boards have strengthened requirements on supply chain transparency even though they juggle numerous other programs in various stages of development. Further, we note that the FLA board was able to take decisions even though they too have apparel supplier members.

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<sup>1</sup> The statistics provided in the report are based on preliminary research.

We further urge that board decisions concerning transparency in brand's Higg Index performance be treated separately from decisions requiring SAC member brands' supply chain transparency. The two are distinct elements of transparency that serve different goals. Supply chain transparency facilitates workers ability to seek redress of grievances. Higg Index Transparency does not facilitate worker grievance redress. It merely informs interested stakeholders how SAC members are faring on the Higg Index.

As you know, over six years have now passed since a series of industrial disasters in Pakistan and Bangladesh killed more than two thousand workers in entirely preventable tragedies, and workers in garment factories around the world continue to face unsafe and abusive working conditions. It is more important than ever, that workers have access to protective measures and expedited grievance redress. Among these steps is supply chain transparency. It allows workers, unions, and their advocates to know which brand to alert when working conditions are unsafe or abusive.

We believe the SAC board should set strong, forward-looking policies that create incentives for brands that are industry leaders on transparency and disincentives for those who lag behind. We therefore urge the SAC board to call for a special board meeting ahead of any regularly scheduled board meetings to vote to make public disclosure of supply chain information a condition of SAC membership at least for brands and retailers. We strongly encourage such transparency requirements to be aligned with the Transparency Pledge (Appendix I).

We look forward to a written response from you as soon as possible, but no later than October 28, 2019, updating us on the SAC board decisions. All written responses may be sent to [transparency@hrw.org](mailto:transparency@hrw.org). Please note that all written responses, or lack thereof, will be reflected in our upcoming report, due to be published in November 2019.

Best regards,

Alison Friedman, Executive Director, International Corporate Accountability Roundtable

Aruna Kashyap, Senior Counsel, Human Rights Watch

Christy Hoffman, General Secretary, UNI Global Union

Ineke Zeldenrust, Clean Clothes Campaign International Office, Clean Clothes Campaign

Judy Gearhart, Executive Director, International Labor Rights Forum

Lynda Yanz, Executive Director, Maquila Solidarity Network

Scott Nova, Executive Director, Worker Rights Consortium

Sharan Burrow, General Secretary, International Trade Union Confederation

Valter Sanches, General Secretary, IndustriALL Global Union

CC:

1. Ms. Tara Rangarajan, Vice Chair, SAC Board; Global Operations Manager, ILO Better Work
2. Ms. Amina Razvi, Executive Director, SAC
3. Mr. Baptiste Carriere-Pradal, Vice President, SAC
4. Representatives from adidas, ASICS, Esprit, G-Star RAW, H&M, Levi's, Nike, and Patagonia.

## Appendix I

### The Apparel and Footwear Supply Chain Transparency Pledge

#### (“The Transparency Pledge”)

This Transparency Pledge helps demonstrate apparel and footwear companies’ commitment towards greater transparency in their manufacturing supply chain.

Transparency of a company’s manufacturing supply chain better enables a company to collaborate with civil society in identifying, assessing, and avoiding actual or potential adverse human rights impacts. This is a critical step that strengthens a company’s human rights due diligence.

Each company participating in this Transparency Pledge commits to taking **at least** the following steps within three months of signing it:

#### **Publish Manufacturing Sites**

The company will publish on its website on a regular basis (such as twice a year) a list naming all sites that manufacture its products. The list should provide the following information in English:

1. The full name of all authorized production units and processing facilities.<sup>1</sup>
2. The site addresses.
3. The parent company of the business at the site.
4. Type of products made.<sup>2</sup>
5. Worker numbers at each site.<sup>3</sup>

Companies will publish the above information in a spreadsheet or other searchable format.

---

<sup>1</sup> Processing factories include printing, embroidery, laundry, and so on.

<sup>2</sup> Please indicate the broad category – apparel, footwear, home textile, accessories.

<sup>3</sup> Please indicate whether the site falls under the following categories by number of workers: Less than 1000 workers; 1001 to 5000 workers; 5001 to 10,000 workers; More than 10,000 workers.

6 September 2018

Dear Ms Kashyap,

First of all, let me thank you and the other signatories for your letter of 25 June 2018. We find it highly encouraging that, like us, your group of human rights and labour rights organisations is very attentive to the issue of supply chain transparency and is seeking ways and means to increase visibility into manufacturing value chains.

amfori appreciates your message and the relevant considerations and recommendations. As detailed in our response to your questionnaire in May and at previous occasions, we have been committed to supply chain transparency for many years already and have taken and initiated concrete actions in this regard. Our common Code of Conduct and single Implementation System facilitate transparency by aligning more than 2,400 member companies. Members are encouraged to share best practices and can opt to disclose their own company name to other participants in our system. In addition, in 2017 the amfori Auditing Integrity Programme (AIP) has been piloted and then launched in 2018, and our External Grievance Mechanism is in use since 2017.

Our approach is holistic and ambitious because the amfori BSCI and BEPI programmes are effectively covering the entire range of fast-moving consumer goods. With our services we are present in more than 100 sourcing countries of our members and offer a practical framework and a set of unique tools in 21 industry sectors; i.e. textiles, clothing and leather are only one sector group out of many. We need to take into consideration the nature of each and every product category. Our members – multinational companies, SMEs and business associations – come from 44 countries with different legal systems and regulatory requirements. You will therefore understand that your approach, which is well-intentioned and an important contribution to our joint objective, is not sufficiently reflecting the complex needs of our organisation and membership.

For amfori, supply chain transparency is a key strategic priority for 2019 and the years to come. Our aim is to lift the discussion to a higher level and, based on our current deliverables, to take specific measures across the association to ensure further progress and even more tangible outcome. The amfori Board of Directors, the amfori Members Advisory Council and the amfori Stakeholder Advisory Council have initiated an intensive debate about the introduction of updated and additional guidelines and policies. We will take the initiative to inform you of our progress in this important matter.

amfori is committed to consult with interested parties and stakeholders and to exchange information and experiences at an expert level. We greatly value your input and will take the liberty to contact you again to discuss how to increase mutual understanding of our respective actions and explore ways of possible cooperation.

We look forward to our future discussion.

With kind regards,



Christian Ewert  
President, amfori

**amfori**

Avenue de Cortenbergh, 172

1000 Brussels, Belgium

T +32 2 762 05 51

E [info@amfori.org](mailto:info@amfori.org)

[www.amfori.org](http://www.amfori.org)

Dutch Agreement on Sustainable Garments and Textile  
Social and Economic Council  
The Hague

To: Aruna Kashyap

CC: Ben Vanpeperstraete

Re: The Apparel and Footwear Supply Chain Transparency Pledge

September 21, 2018

Dear Aruna, dear Ben,

Following up to my mail from July 19, 2018 I herewith have the pleasure to inform you about the position of the Dutch Agreement on Sustainable Garments and Textile (hereafter: AGT) regarding the Transparency Pledge, as you invited us to do by your letter of July 12, 2018. This position has been agreed upon by the Parties to the AGT on September 21, 2018.

For the AGT, transparency is a very important pre-condition for companies that implement (proper) due diligence in line with the OECD Guidelines for multinational enterprises (2011). Without precisely knowing where the goods are actually produced / manufactured, brands, retailers, traders, importers and agents cannot execute risk based due diligence and therefore cannot meet the demands of the AGT. That is why the Parties to the AGT have agreed that all participating companies should share the data concerning their first tier of producers (that is, manufacturers including subcontractors used) with the AGT Secretariat. As of year three, participating companies should increasingly share the data relating to tiers further up their (individual) supply chain.

In order to properly support the participating companies in mustering and sharing the data relating to the production locations in their supply chain, the AGT Secretariat has developed a template. Whereas companies are not obliged to fill in all fields of the template, they are encouraged to increasingly do so, because it helps them better understand their own supply chain. As of January 2018, this template has been modified to ensure it is in line with the demands of the Transparency Pledge. The AGT Secretariat hopes that using the template will lower the bar for participating companies to work toward individual disclosure of their supply chain. You can check the template used by the AGT via the demo-version of the e-Tool used by the AGT:

[REDACTED]

As always, any feedback you might have regarding our template is highly appreciated.

Parties to the AGT agreed that the AGT Secretariat annually publishes an aggregated list of production locations submitted to it by the participating companies. This aggregated list aims to support the much needed transparency in the garment and textile sector by allowing stakeholders, including NGO's and labour unions, to report (alleged) concerns regarding violations of fundamental human rights including labour rights (as well as concerns regarding environmental and animal welfare related issues) to the AGT Secretariat. In such cases, the AGT Secretariat will contact the company or companies that have listed the production location in question and urge them to address the issue directly and report to the Secretariat about the developments, since they accepted working on the basis of due diligence when they

signed up to the AGT. To ensure proper follow-up, references to such cases have been included in the Assessment Framework of the AGT. This means, inter alia, that any such case is – or will be - discussed with the management of the company during the annual assessment by the AGT Secretariat.

Since July 2017, the AGT Secretariat has been contacted 11 times in this regard and has followed-up in line with the above.

On July 4, 2018, the AGT Secretariat has published the second aggregated list, which contains 4.267 factories. Parties to the AGT and the AGT Secretariat are looking forward to work with you on actual improvements in concrete situations based on the list.

In the AGT, Parties deliberately enclosed references to the importance of transparency. In this respect, the following aspects are relevant from the viewpoint of operationalising the provisions of the AGT:

1. Companies that have signed up to the AGT must annually conduct due diligence and issue their action plan, which is then evaluated by the secretariat of the AGT. Early 2018, the secretariat has published its Assessment Framework, in which its working methodology regarding the evaluation of the due diligence and the action plans is laid down. In it, specific reference to the Transparency Pledge is included, to underscore the importance of transparency in line with societal demand. You can find the Assessment Framework at the website of the AGT: [https://www.imvoconvenanten.nl/garments-textile/agreement/publicaties?sc\\_lang=en](https://www.imvoconvenanten.nl/garments-textile/agreement/publicaties?sc_lang=en) Naturally, the issue of transparency is discussed during the evaluation meetings with all participating companies.
2. The secretariat of the AGT issues frequent Newsletters and Updates for its parties, support organisations, the public at large and the participating companies. At regular intervals the importance of transparency is stressed. Whenever appropriate, reference to the Transparency Pledge is made. So far, this has been done multiple times and we will continue to do so. The secretariat of the AGT is open to input from your side to this effect.
3. Companies that sign up the AGT accept that they will have to publicly communicate about their RBC efforts and activities by the third year of their accession to the AGT at the latest. Last July, all companies have been informed about the criteria the Steering Committee of the AGT has set to that effect. These criteria are identical to the criteria mentioned in chapter 5 of the OECD Guidance on responsible Business Conduct for the Apparel and Footwear Sector (2017). There, too, the importance of transparency is explicitly mentioned. Publishing data on the suppliers in their own individual supply chain is recommended as 'good practice'. The first public communications by companies that signed up to the AGT in 2016 are due by July 3rd, 2019 at the latest.

The AGT started off in July 2016 with an original mandate of 5 years. At this moment, the AGT just entered its third year of operation out of five. The Parties to the AGT do not see reason to make any changes to the agreement regarding transparency at this moment.

I trust this position of the AGT is helpful to your work. In case you have any questions, please do not hesitate to contact me.

Kind regards,  
On behalf of the AGT

Jef Wintermans  
Coordinator



Amol Mehra, Director, International Corporate  
Accountability Roundtable  
Ineke Zeldenrust, Clean Clothes Campaign International  
Office, Clean Clothes Campaign  
Janet Walsh, Acting Director, Women's Rights Division,  
Human Rights Watch  
Judy Gearhart, Executive Director, International Labor  
Rights Forum  
Lynda Yanz, Executive Director, Maquila Solidarity Network  
Philip Jennings, General Secretary, UNI Global Union  
Scott Nova, Executive Director, Worker Rights Consortium  
Sharan Burrow, General Secretary, International Trade  
Union Confederation  
Valter Sanches, General Secretary, IndustriALL Global  
Union

Bündnis für nachhaltige Textilien -Sekretariat  
c/o Deutsche Gesellschaft für  
Internationale Zusammenarbeit (GIZ) GmbH  
Friedrich-Ebert-Allee 36  
53113 Bonn  
Germany

## RE: RE: The Apparel and Footwear Supply Chain Transparency Pledge

July 31<sup>st</sup>, 2018

Dear Sir or Madam,

Thank you very much for your letter of July 2, 2018 and for suggesting concrete steps and measures for our initiative. Supply chain transparency is high on the agenda of the Partnership for Sustainable Textiles. Taking a stepwise approach, all members are obliged to systematically record their business partners and producers by the end of this year. The publication of the same list is endorsed by the partnership as a recommended goal, as is the identification of actors in the deeper supply chain.

Yet, the Partnership's commitment to promote supply chain transparency does not end here. In a recent workshop, around fifty representatives from our member organizations met to exchange their perspectives on supply chain transparency. Following up on this event, a smaller working group will now discuss further actions and suggest concrete next steps for the Partnership. Taking a multi-stakeholder and membership-based approach, it is up to this group to come up with a

### Contact of the Partnership Secretariat

E-Mail: [REDACTED]  
Phone: +49 228 4460-3560  
Member area: <https://portal.textilbuendnis.com>

comprehensive concept by the end of this year. We have forwarded your letter to the group to be considered in the upcoming discussions. Most certainly the Partnership will inform you about the outcome of this project.

Kind Regards,



Dr. Jürgen Janssen

Director of the Partnership Secretariat

**Contact of the Partnership Secretariat**

E-Mail: [REDACTED]  
Phone: +49 228 4460-3560  
Member area: <https://portal.textilbuendis.com>

postal address  
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the Netherlands  
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www.fairwear.org  
info@fairwear.nl



Amsterdam, 31 July 2018

RE: Coalition letter - The Apparel and Footwear Supply Chain Transparency Pledge

Dear Ms Kashyap,

Thank you for reaching out to us. We appreciate the important work of your coalition for the apparel and footwear industry towards greater transparency. We are happy to inform you about our policies and actions related to transparency.

We are pleased to announce that our updated FWF transparency policy will be effective as of early 2019, including the publication of factory data aligned with the Transparency Pledge. In the past period, FWF has contacted members and stakeholders through multiple meetings and other means, to inform them about the benefits of supply chain disclosure and to get their feedback for this new policy, which was recently adopted by our multi-stakeholder (Unions, NGOs, Industry Associations) Board.

Besides aspects of accountability and credibility, FWF particularly emphasizes the relevance of transparency to improve access to remedy. Our aggregated publication of production locations sourcing to FWF members will therefore provide an online possibility for workers, activists, unions and others acting on behalf of workers to express concerns or submit complaints. When a complaint is received, our FWF complaint handling team follows up together with the member brand according to our extensive [complaints procedure](#). Standard FWF procedure includes publishing complaints, follow-up and remediation on our website.

Besides making public which factories produce for FWF members, our transparency policy will also facilitate direct sharing of production location information among members. Here too, the objective is to support brands in exchanging information and joining forces to improve factories' social labour practices.

Both parts of our new policy will apply to all member brands by default. Member brands that choose to opt-out of the public factory listing (if any), will see consequences to their Brand Performance Check scoring, and their decision will be made public. Brands not participating in the information sharing among members, will not be entitled to receiving crucial knowledge on production locations from other FWF member brands.



We actively encourage members to be transparent about their own suppliers. And we will continue to do so. In our communication about the new transparency policy to our members, we would be happy to promote the Transparency Pledge.

We score FWF members' supply chain disclosure efforts in various ways. Since 2012, our Brand Performance Checks rate member engagement in advanced reporting activities, and since 2016 members are rewarded when they publicly disclose production locations (indicator 6.2 of our [Brand Performance Check Guide](#)). For each of the brands you can find their performance on the [FWF Brand page](#). As mentioned above, these measures will be expanded in the upcoming revision of the scoring tool.

FWF considers transparency essential to impactful due diligence, and a key element of FWF membership is full transparency of all our members to FWF. This of course includes substantially more information than covered under the Transparency Pledge, including a full overview of subcontractors, audits, CAP follow-up, financial information and complaint handling. Based on this information, FWF offers brands tools to improve workers' conditions. Both in terms of public information and for purposes of monitoring and scoring members' due diligence efforts, transparency is very high on our agenda and we appreciate the opportunity to inform you on our policies and efforts to promote it among our membership and throughout the industry.

Should you have further questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Alexander Kohnstamm", with a long horizontal flourish extending to the right.

Alexander Kohnstamm

*Executive Director,  
Fair Wear Foundation*

The logo for Fair Wear, consisting of the words "FAIR" and "WEAR" in white, bold, sans-serif capital letters. "FAIR" is positioned above "WEAR", and both are contained within a red, slanted rectangular background that is split into two overlapping sections.

# FAIR WEAR

P.O. Box 69253  
1060 CH Amsterdam  
The Netherlands  
t +31 (0)20 408 4255  
[info@fairwear.org](mailto:info@fairwear.org)  
[www.fairwear.org](http://www.fairwear.org)

Human Rights Watch  
attn. Ms. Aruna Kashyap

Saturday, October 19, 2019

Dear Ms. Kashyap,

Thank you for giving us the opportunity to work with you in strengthening meaningful transparency in the apparel and footwear industry. Our Board, which as you know consists of Trade Union, Employers and Labour Rights NGO representatives, has set a transparency policy that we believe will contribute greatly to the collective efforts for strengthening the position of garment workers around the world.

As we wrote to you in our letter of July last year, Fair Wear considers transparency essential to impactful due diligence. A key element of Fair Wear membership is full transparency by all our member brands to our organisation. This includes substantially more information than covered under the Transparency Pledge, including for example a full overview of subcontractors, audits, CAP follow-up, financial information and complaint handling. Based on this information, our experts benchmark and verify the efforts of our members and offer them tools to improve workers' conditions. The information is also essential in our work with trade unions and other promoters of labour rights – mostly in production countries, but also internationally – to improve factory conditions and workers' lives. And finally, researchers are given access to analyse conditions and developments.

We believe that it is first and foremost the brands that are responsible for risk assessment and risk mitigation of labour circumstances in their supply chains. Brands that sign up with Fair Wear are thoroughly verified and benchmarked, and our assessment of their performance is publicly available through [our website](#). These are very extensive reports that give great insight into the performance of the brands on due diligence and sourcing practices. We also encourage brands to collaborate in improving working conditions in the factories they source from. For that reason, our transparency policy includes direct sharing of production location information among members.

Fair Wear particularly emphasizes the relevance of transparency to improve access to remedy. Our publication of production locations sourcing to member brands will therefore provide an online possibility for workers, activists, unions and others acting on behalf of workers to express concerns or submit complaints. When a complaint is received, our specialist complaint handling team follows up together with the brand according to our extensive [complaints procedure](#). This procedure includes the

publication of the complaints, follow-up and remediation on our website. Most complaints are received directly from workers, through our local language hotlines in 11 production countries.

Fair Wear Foundation's standards and their application to brands are seen by many as the strictest and most extensive in the area of labour conditions. We believe this is due in part to the involvement of trade unions and activists like the Clean Clothes Campaign in the multi-stakeholder setup of our organisation. A downside to this, unfortunately, is that we are often confronted with false statements to consumers from brands and retailers that claim to be working 'only with Fair Wear approved factories'. For this reason, our aggregated publication of production locations sourcing to Fair Wear member brands will not be in the form of a list of factories, but rather through a search function that allows anyone with concerns about a factory to check whether it appears in our database. We understand that this may not be the preferred form for all promoters of transparency, but we have to balance those views with the need to counter greenwashing which in our eyes is also a very serious issue in this industry.

We are happy to respond to your specific questions on transparency, please find our reaction below:

1. Will FWF score companies that are individually publishing their supplier factories list differently from those that are only participating in aggregate disclosure?

The joint Fair Wear publication is expected to include many more brands than those currently publishing on their own website (which is around 25%). However, within the current scoring system, we can not differentiate between a brand opting to disclose its factories via the Fair Wear website or publishing a list on its own website. We intend to take this on board in the next revision of the Brand Performance Check.

2. How long can companies that do not individually publish their supplier factories list be a part of Fair Wear without facing brand membership consequences?

See our response to question number 1, above: at present, we can't differentiate in our scoring between individual publication and participation in the joint Fair Wear publication.

3. Will the search database have information about factory locations where FWF does not have an office/field presence?

Yes, the database will contain all factories that brands decide to disclose.

4. Details about the search function, explaining whether it's searchable only by factory name or will be searchable by product-type, country, city, and other parameters.

Currently, the search function is to be on factory name and name of parent company. If the search could be done on product-type, country etc., it would result in lists of factories which as we explained is not our solution.

5. Whether FWF will also reveal how many of its corporate members have opted out of the database and how many locations across different countries are therefore excluded from the database.

Yes, we will publish the rate of corporate members that have opted out. We will also publish per brand how their level of publication relates to their total production volume. At this moment, we have not planned to relate these percentages to specific countries. Technically, this should be possible so we will look into how this information could be made available.

6. Consequences for corporate members "opting out" of aggregate transparency.

Fair Wear will publish the total percentage disclosed online and publish the percentage per member brand that is disclosed. In addition to this, we will explicitly list the names of the brands that opt out of disclosing factory information on the Fair Wear website.

These members will score poorly on the related indicator and will receive a *requirement* in their performance check. Requirements that are not followed up will be 'punished double' in the subsequent performance check, impacting their score significantly.

These members will also miss out on the opportunity to gain further insight into the factories shared with other member brands. Moreover, the (cost) benefits of collaboration on audits, training, CAP remediation and planning will be much less likely without this additional information.

7. OAR cooperation plans

When we started working on the implementation of our new transparency policy, we reached out to OAR to see if we could implement our policy through their setup. Unfortunately, this was not possible for technical reasons, but we also noticed that they did not cover all data required under the Transparency Pledge – nor were they able or planning to include them. For those reasons, we unfortunately could not collaborate at the time.

Since then, we have worked on our own implementation and remain in contact with the OAR as we do support their effort to promote unique factory identifiers and still intend to work with them once our own implementation is completed. We intend to find a way to connect the two databases without exorbitant technical costs.

Should you have any further questions, please do not hesitate to contact me.

Warm regards,

A handwritten signature in black ink, appearing to read "Alexander Kohnstamm". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Alexander Kohnstamm  
*Executive Director,*  
*Fair Wear Foundation*

Human Rights Watch  
attn. Ms. Aruna Kashyap

Wednesday, November 27, 2019

Dear Ms. Kashyap,

Yesterday, we had a meeting of our Committee of Experts that included a discussion on transparency. From this meeting and the preparatory note submitted by CoE members who also represent partners in the Transparency Pledge, we observed that there were some misunderstandings regarding Fair Wear's transparency policy. Additionally, the discussion gave us reasons as well as practical solutions to take extra steps on this important topic. Therefore, I would like to add (in part, repeat) the following information to our previous correspondence with you.

As for the search function that we mentioned, it should be noted that a few letters will suffice to get an appropriate list of candidates to select from the list of disclosed factories. This can be in several combinations; spelling mistakes are compensated so there is ample room for finding a factory in the database even if you're unsure about the exact spelling. Search results will show the full Transparency Pledge information per factory, as well as the OAR number. Searches can also be done on OAR number.

The search function will also provide the user with the aggregated list of factories. So, and this is one of the new steps thanks to yesterday's discussion, we will now be making the list publicly available through our website. This will include a clear disclaimer text stating that in no way it may be misconstrued to be a reference guide of 'Fair Wear approved factories', in order to counter the danger of abuse for greenwashing that we described in our letter of last month.

As mentioned before, there will also be the option to immediately file a complaint through our unique complaints mechanism. This goes well beyond any other initiative in terms of access to remedy. Access to remedy will be further strengthened by sharing aggregated lists per country with local stakeholders like trade unions and labour rights NGOs.

Finally, we repeat our commitment to promoting the Transparency Pledge and gladly discuss with you how to best do this. For our membership, we do not only endorse the Pledge but also take an extra step by practically facilitating our members to endorse it. Members can download their information within the Fair Wear database in a custom-made template that includes all the information the Transparency Pledge requests. Especially for our smaller brands, this feature of our information management system will save them time and reduce barriers for signing the Pledge.

Thank you for including this information in your study. We appreciate the positive discussion the Transparency Pledge and its constituents are bringing to the topic. Should you have any further questions on the above, please do not hesitate to contact me.

Warm regards,

A handwritten signature in black ink, appearing to be "Alexander Kohnstamm". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Alexander Kohnstamm  
*Executive Director,*  
*Fair Wear Foundation*

**Apparel and Footwear Supply Chain Transparency pledge**  
**Human Right Watch**  
**Aruna Kashyap**  
**Senior Counsel**  
**Women's Rights Division**

Amsterdam | July 28, 2018

Subject: In Response to the Apparel and Footwear Supply Chain Transparency Pledge

Dear Ms. Kashyap,

On behalf of the Sustainable Apparel Coalition (SAC), I would like to thank the organisations leading the Apparel and Footwear Supply Chain Transparency Pledge effort for reaching out to us to advance the urgent conversation and action regarding transparency in our industry.

Positive and constructive dialogue with other initiatives active in sustainability is a key aspect of the SAC's work. In this vein, we welcomed the informal meeting organised by the Clean Clothes Campaign and ICAR in Brussels on March 20, 2018 intended to discuss how to make our industry more transparent. We look forward to continuing this important conversation.

The SAC defines transparency as the systematic communication of easily accessible, clear, complete, verified and impact-oriented sustainability information, throughout the value chain and of products. We recognize transparency as a key driver to achieve social and environmental sustainability within our industry. The SAC embarked on this journey since its creation in 2009 and has committed to transparency as its 2020 strategy.

Our conviction is that transparency will only be effective if everybody speaks a common language. Throughout the last 10 years we have worked tirelessly with our members to bring this common language and measurement standard to the industry: [the Higg Index](#). In this journey towards transparency, we leverage the development and adoption of our tools to drive actions among our members.

Today, we are happy to share that more than eight thousand factories are using the Higg Facility Environmental Module to measure and share their environmental performance with their business partners. Next year, in collaboration with the Social and Labour Convergence Program, we will deploy the updated Higg Factory Social & Labor Module to equally measure social performance of factories. Through our transparency efforts, we will enable Higg Index users to share their sustainability performance with industry peers first, and later their verified one publicly, once we have created a robust methodology to do so.

Through the Higg Brand & Retail Module, we encourage our brand and retail members to embrace transparency by first evaluating whether they trace their own supply chain performance and publicly disclose information about it. We will pilot this tool in the next months with our members. The Clean Clothes Campaign will be invited to participate in this pilot, creating another opportunity to further discuss how we can encourage more members to embrace assessing value chain sustainability.

At an organisational level, we have also signed the Global Fashion Agenda that supports disclosing supply chain locations.

Now, with the SAC aligned behind transparency, and with the common language well under way, we are ready to engage in dialogue on how to make transparency a reality.

In April 2017, we organised two events in Sweden where we presented our path towards transparency and engaged with many of the organisation signatories of the transparency pledge on how and when our members should disclose and what information would ensure meaningful and impact-oriented communications. In

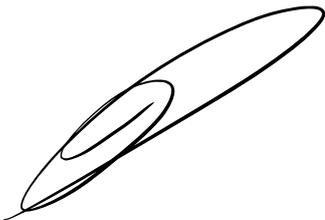
addition, we are planning engagement activities and events for transparency stakeholders, such as the transparency pledge signatories, on a more frequent and reoccurring basis.

In Brussels, I had the opportunity to present the SAC plan for adding several new key transparency requirements for our members. As a membership organisation, such a process for review and adoption of these requirements needs to follow clear rules of engagement. We are now in a process of internal conversation with our members to frame what those requirements could be. Then, the SAC Board of Directors will validate the final proposition. This shall be concluded by S1 2019, when I will then be in a position to communicate back to you the result of this process.

Continuing to raise our members' awareness of the importance of transparency is key, and we therefore welcome you and any of the transparency pledge signatories to organise a webinar for our full membership on this topic. We would suggest presenting your vision, rationale, current actions, expected positive impacts and your asks of the industry with the opportunity for members to ask questions. I will be contacting you in a separate e-mail to discuss this point further.

I look forward to our continuous conversation along this process, and to the day when we will effectively join our efforts to make our industry fully transparent.

Baptiste Carrière-Pradal  
Vice-President Sustainable Apparel Coalition

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke, positioned below the typed name and title.

3<sup>rd</sup> August 2018

**Re: The Apparel and Footwear Supply Chain Transparency Pledge**

Dear Colleagues

Firstly let me apologise that this fuller response has taken longer than intended. We are somewhat short-handed at the moment and have a very busy agenda. I would like to respond to what I understand are the key points in your later dated June 27<sup>th</sup>.

I would like to draw your attention to the fact that ETI membership, while including a number of Apparel and Footwear brands and retailers, also includes a number of other sectors, not least food as well as hard goods etc. We also have both suppliers as well as retailers as members. Therefore the work we are doing to drive greater transparency needs to consider all types of members and the sectors in which they operate. The work being done in the A&T sector, including initiatives like the Pledge help demonstrate leadership and provide the impetus for this wider drive.

To the points in your letter. Firstly with respect to strengthening ETI policies concerning member companies supply chain transparency. We have made a clear commitment in our current strategy to increase transparency. The strategy says:

By 2020 we will:

- Have demonstrated the case for companies being more transparent about their supply chains and the degree to which workers enjoy their rights.
- Have a robust and credible reporting system that drives evidence-based accountability.
- Provide publicly available authoritative and well-recognised reports on member companies to support their commitments and achievements.

This I believe demonstrates our commitment to strengthening our approach with a clear agenda and timeframe. From this overarching commitment we have been working on a framework that not only addresses pathways to supply chain disclosure but also other aspects, such as policy on the one hand and risks identified and remediation actions taken, on the other. This comprehensive approach to transparency is we believe the most likely to result in improvements for workers. However it does take time to develop and consult with all members on ensuring it is robust.

Responding to your deadline of January 2020 for disclosure, while we are aware of this and indeed our own agenda sets out 2020 as our own end point we will continue to work on the plans agreed with members and overseen by the ETI board.

In our current annual reporting framework which every company member must report against once they have graduated to full membership, progress against public reporting and disclosure is one of the areas that we recognise as demonstrating leadership. I include the extract of this framework in an annex below. There are examples like M&S, Tesco and more recently PRIMARK all of whom we have been in discussion with, supporting their efforts to



## Ethical Trading Initiative

disclose their supply chains as they have developed the internal buy-in and systems that will allow for this to be rigorous and robust. We hope to see more such examples before the 2020 deadline.

Through our revised reporting tool, the internal discussion on transparency and support for individual members, we believe that ETI is setting “strong, forward-looking policies that create incentives for industry leaders on transparency and disincentives for those who lag behind” as you request.

In response to the particular bullet points in your letter.

1. Make the public disclosure of supply chain information by January 2020, at a minimum in accordance with the Transparency Pledge, a condition of membership;

*While we will make progress by 2020 to establish clear pathways for transparency, including supply chain disclosure there are no plans at present to make this a condition of membership. The reason for this is that some companies who join ETI are early in the stages of their journey on ethical trade, may come from a non A&T sector like produce and we prefer to establish the expectations over time for a number of aspects of ethical trade, whether that is disclosure or, risk assessment, or promoting freedom of association. However that should not be seen as an excuse for a new member who might join and should be fast tracking disclosure due to their position in the market etc*

2. Endorse the Transparency Pledge and promote it publicly;

*As we made clear in earlier communication we support the objectives and the specific requests of the pledge and have encouraged members for whom this is relevant to consider signing up. We will continue to do so, but recognise that this is not appropriate for all our members.*

3. Urge ETI's apparel and retail members through private discussions or letters to sign on to and implement the Transparency Pledge as an additional step toward greater transparency;

*As noted above, we have done this in the past and will continue to reach out to companies in the A&T sector to encourage companies to consider signing up to the pledge.*

4. Between now and January 2020, publicly scorecard ETI's member-companies, on an annual basis, regarding the supply chain public disclosure efforts, including alignment with the Transparency Pledge;

*ETI has an internal reporting mechanism that considers performance on a number of areas in ethical trade including reporting and disclosure. As part of our work in increasing transparency we will be putting in place a public*



## Ethical Trading Initiative

*reporting aspect by the deadline of 2020. In doing this we are taking into account a number of transparency initiatives, to see to what extent we can align with existing expectations. We note the importance and profile of the Pledge in the A&T sector as a reference point*

5. Advise companies about the benefits of supply chain disclosure, including the sharing of best practices among brands themselves, as well as possible benefits through the swift flow of information to brands from local and global nongovernmental organizations and unions; and

*As you might imagine we are actively doing this as part of the consultative process and to develop support and buy-in for greater transparency generally and for the changes ETI is making to its requirements.*

6. Encourage companies to deepen their transparency efforts beyond those set out in the Transparency Pledge.

*As indicated earlier ETI's work goes beyond the important step of supply chain disclosure and we will continue to encourage and recognise companies to consider transparency.*

I hope that you will see from this response that ETI's work is very much in line with objectives of those who created the Pledge and I believe aim to go beyond supply chain disclosure. We value the work that those behind the pledge have done to drive the impetus for change in the A&T sector.

I would be grateful if you could share this response with all those who signed the letter.

Yours Sincerely

Peter McAllister

Executive Director



Annex 1 Extract of ETI reporting framework	
4.2	<b>Communicating and influencing</b>
	<ul style="list-style-type: none"> <li><input type="checkbox"/> Entry-level requirements not yet achieved</li> </ul>
Entry	<ul style="list-style-type: none"> <li><input type="checkbox"/> Company publicly communicates its ETI membership and the participation in other initiatives advocating ethical trade</li> <li><input type="checkbox"/> Company builds its understanding about how to communicate ethical trade information in the public domain</li> <li><input type="checkbox"/> Company publicly communicates its commitment to ethical trade in its policy statement (see 1.1 E)</li> </ul>
Improver	<ul style="list-style-type: none"> <li><input type="checkbox"/> Company starts to publicly communicate some detailed information about its ethical trade processes and activities (in corporate communication and so on)</li> <li><input type="checkbox"/> Company highlights challenges as well as successes in the information it communicates</li> </ul>
Achiever	<ul style="list-style-type: none"> <li><input type="checkbox"/> Company publicly communicates its due diligence processes and how these are incorporated into decision-making processes</li> <li><input type="checkbox"/> Company publicly communicates its salient labour right issues and the prevention and mitigation actions taken</li> <li><input type="checkbox"/> Company publicly communicates the effectiveness of its prevention and mitigation actions and other measures of impacts that it may chose to highlight</li> <li><input type="checkbox"/> Company publicly communicates supplier list information</li> <li><input type="checkbox"/> Company updates the information above at least once a year</li> <li><input type="checkbox"/> Company participates in advocacy actions influencing the policies on local, national, regional or international levels commensurate with its size (on its own or through collaboration)</li> </ul>
Leader	<ul style="list-style-type: none"> <li><input type="checkbox"/> Company publicly communicates the grievances it has received and the remediation provided, when appropriate</li> <li><input type="checkbox"/> Company publicly communicates supplier list information beyond tier 1</li> <li><input type="checkbox"/> Company communicates to and raises awareness of its customers about ethical trade issues</li> <li><input type="checkbox"/> Company promotes ethical trade practice and advocates for more effective legislation or enforcement of existing legislation on workers' rights, commensurate with its size (on its own or through collaboration), by engaging with:               <ul style="list-style-type: none"> <li><input type="checkbox"/> Public institutions in its home country</li> <li><input type="checkbox"/> Public institutions in its sourcing countries</li> <li><input type="checkbox"/> Regional or international organisations or initiatives (UN, EU, ILO etc)</li> </ul> </li> </ul>



**Ethical Trading Initiative**



For workers' rights. For better business.

## **Statement of response to HRW**

### **Update on ETI Transparency and Accountability**

“There are increasing calls for increasing transparency from business, not least on where they source and what impacts they are having. Some have already published supplier locations, some are working towards this, but there is more to do in terms of being more open about where exploitation is happening and what actions have been taken.

ETI has made a commitment to explore how to drive increased transparency in 3 key areas: ETI's own transparency; ETI's transparency about its members; and ETI members' own transparency.

We set up a Tripartite Advisory Group to drive exploration of these 3 areas through a detailed process of consultation, which led to a set of recommendations which were presented to our Senior Management Team and Board for consideration as to next steps, which were approved in principle at the recent October Board meeting.

Those proposals include concrete commitments by ETI on the 3 areas mentioned above and the intention is that those changes and requirements both for ETI and for our members would be implemented from October 2020. The first next step is that we will inform our members of those proposals and what it means for them and their businesses.”

Rotterdam, 31<sup>st</sup> of October 2019

dare to dream  
dare to grow  
dare to be

Dear Aruna Kashypa,

At marlies|dekkers we put environmental and social impact at the heart of the company. Therefor we are pleased to confirm that we will sign the transparency pledge during the stakeholders meeting on the 12<sup>th</sup> of November 2019 in The Hague.

Kind regards,



Eppo van Berckelaer  
CEO

**marlies|dekkers**

**Dare To Be B.V.**

**Voorhaven 17**

**3025 HC Rotterdam**

# KappAhl

*Möln dal / October 2, 2019*

KappAhl's journey in becoming more transparent as a company but also as part of an intricate value chain is an ongoing commitment and endeavor. We actively opened up to third party auditing when we in 1999, as one of the first fashion companies in the world, became certified according to ISO14001. Since 2009, we annually report on our sustainability work in our Sustainability Report. In 2013, we started publishing a list of our suppliers' tier 1 factories on our website. Within the scope of our Responsible Fashion Strategy we are currently working with many activities to develop this even further. As members of the Sustainable Apparel Coalition, we are implementing Higg Index in our supply chain for increased transparency, and we are developing a process for traceability further down our supply chain, which will now allow us to include also subcontractors in our list of supplier factories. We want to make our ongoing commitment clear to all stakeholders and that is why we chose to sign the Transparency Pledge. We update the supplier list biannually. Starting from the next update in May 2020, our list will include all data points as set down in the Transparency Pledge.

BEST REGARDS



FREDRIKA KLARÉN  
*Head of Sustainability*

KOI International B.V.  
Krijn Taconiskade 440  
1087HW Amsterdam

### Transparency Pledge Kings of Indigo

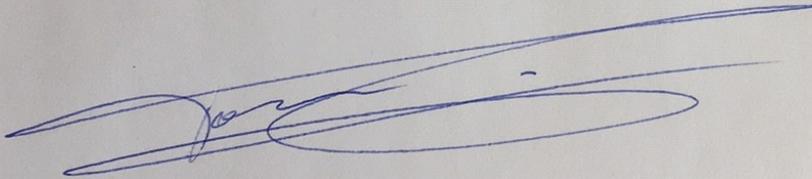
Transparency is seen as the first step towards better practices in the garment industry. It supports in finding partners to collaborate on improving conditions throughout the supply chain. Kings of Indigo has been committed to transparency for a long time and pledges to keep committing to this in the future.

Kings of Indigo hereby pledges to at least bi-annually release on updated manufacturers list in a searchable format.

The manufacturers list will be in line with the Transparency Pledge as defined by the nine labor and human rights organizations including Clean Clothes Campaign. Kings of Indigo will be stating all current authorized production and processing facilities with at least the following information:

1. The full name
2. The site addresses
3. The parent company
4. Type of products made
5. Worker numbers

This information will be found on the website – Kings of Indigo – and will also be uploaded to the Open Apparel Registry (OAR).



Tony Tonnaer

C.E.O. / King of inspiration Kings of Indigo



**Kings Of Indigo.**

KOI International B.V.  
Krijn Taconiskade 440  
1087 HW Amsterdam  
The Netherlands

# KUYICHI

## TRANSPARENCY PLEDGE

### 2019

Transparency is seen as the first step towards better practices in the garment industry. It supports in finding partners to collaborate on improving conditions throughout the supply chain. KUYICHI has been committed to transparency for a long time and pledges to keep committing to this in the future.

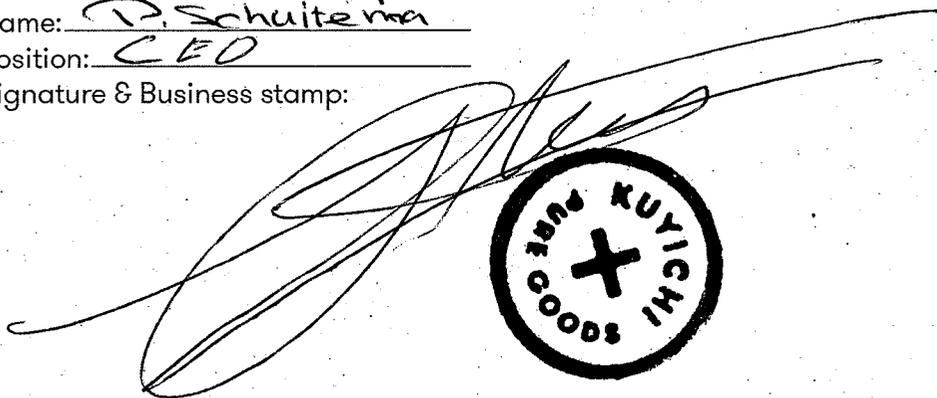
**KUYICHI B.V. hereby pledges to at least bi-annually release an updated manufacturers list in a searchable format.**

The manufacturers list is in line with the Transparency Pledge of the Clean Clothes Campaign and will be stating all our current authorized production and processing facilities with at least the following information:

1. The full name
2. The site addresses
3. The parent company
4. Type of products made
5. Worker numbers

This file will be downloadable on our website - KUYICHI.COM - and will also be uploaded to the Open Apparel Registry (OAR).

Date: 30-10-2019  
Name: P. Schuitema  
Position: CEO  
Signature & Business stamp:

A handwritten signature in black ink is written over a circular business stamp. The stamp is black with white text and features a central cross symbol. The text around the cross reads "KUYICHI" at the top and "GOODS" at the bottom.

To:  
**Human Rights Watch**  
Attn. A. Kashyap

Date: 1 November 2019  
Subject: Okimono Transparency Pledge

Transparency is seen as the first step towards better practices in the garment industry. It supports in finding partners to collaborate on improving conditions throughout the supply chain. As a sustainable label Okimono has been committed to transparency for a long time and pledges to keep committing to this in the future.

**Okimono hereby pledges to at least bi-annually release an updated manufacturers list in a searchable format.**

The manufacturers list will be in line with the Transparency Pledge, as defined by the nine labor and human rights organizations including Clean Clothes Campaign. Okimono will be stating all our current authorizes production and processing facilities with at least the following information:

1. The full name
2. The site addresses
3. The parent company
4. Type of products made
5. Worker numbers

This information is made available on our website [www.okimono.nl](http://www.okimono.nl) - and through the Open Apparel Registry (OAR).

Signed:  
Okimono b.v.  
Gerrit J. Weeren, director

Date: 6-11-2019



UK > wash at low temperatures > line dry > ironing inside out >  
no chemical cleaning > no bleach

NL > wassen op een lage temperatuur > niet drogen in de droger > binnenste  
buiten strijken > niet chemisch reinigen > niet bleken



## The Transparency Pledge

This Transparency Pledge helps demonstrate the commitment of WE Fashion towards greater transparency in their manufacturing supply chain.

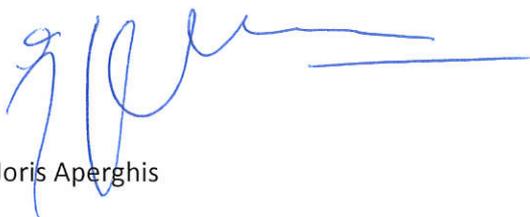
Transparency of the supply chain better enables us to collaborate with civil society in identifying, assessing, and avoiding actual or potential adverse human rights impacts. This is a critical step that will strengthen the human rights due diligence of WE Fashion.

WE Fashion commits to publish a list of Manufacturing Sites on our website before the end of November 2019. The list will be updated twice a year and will name all sites that manufacture products for us. The list will provide the following information in English:

- The full name of all authorized production units and processing facilities.
- The site addresses.
- The parent company of the business at the site (*if applicable and available*)
- Type of products made.
- Worker numbers at each site.

WE Fashion will publish the above information in a searchable format.

Utrecht, 31 October 2019



Joris Aperghis

CEO

### WE EUROPE BV

REACTORWEG 101  
3542 AD UTRECHT  
P.O. BOX 30200  
3503 AD UTRECHT  
THE NETHERLANDS

T. +31 (0)30 2479 479  
WEFASHION.COM

KvK 30089877  
A DIVISION OF  
LOGO INTERNATIONAL BV



Alphen aan de Rijn, Netherlands, April 26<sup>th</sup> 2019

Dear Aruna Kashyap,

Herewith we like to inform you Zeeman decided to sign the Transparency pledge and will publish its production locations on its website on May 29<sup>th</sup>. We are committed to this big step in greater transparency which we believe will enable us to collaborate more closely with stakeholders on human rights.

Sincerely,

A handwritten signature in blue ink, appearing to read "Arnoud van Vliet", with a long horizontal line extending to the right.

Arnoud van Vliet  
Manager CSR & Quality  
ZEEMAN



August 30, 2018

Aruna Kashyap  
Senior Counsel, Women's Rights Division  
Human Rights Watch  
350 Fifth Avenue, 34th Floor  
New York, NY 10118-3299  
[REDACTED]

Dear Ms. Kashyap,

Thank you for your letter regarding the benefits of transparency in garment and footwear supply chains.

Our public Supplier Code of Conduct incorporates internationally recognized human rights standards. We conduct formal benchmarking with industry and multilateral groups to design, operate, and continually improve our risk assessment and audit program. Suppliers manufacturing Amazon private label products must contractually agree to the terms of the Supplier Code of Conduct and suppliers are assessed for compliance with our Supplier Code of Conduct before Amazon begins ordering products. Many sites are assessed multiple times a year, including follow-up assessments to address specific findings. We expect all of our suppliers and service providers to meet the standards in our Supplier Code of Conduct as a condition of doing business with us.

We partner closely with our suppliers and business partners to drive continuous improvement in working conditions; we have dedicated teams that work directly with suppliers and service providers in major geographies. We offer on-site and remote training to support continuous improvement.

We share the goals of your supply chain initiative, as demonstrated by our commitment to safe and ethical working conditions. At this time, we do not intend to sign the Apparel and Footwear Supply Chain Transparency Pledge. We appreciate you reaching out to us regarding your efforts. We will continue to work with Amazon's sourcing teams to select suppliers that align with our standards and expectations, and focus on continuous improvement throughout their operations.

Sincerely,

Kara H. Hurst  
Sustainability Director, Amazon



November 1, 2019

Aruna Kashyap, Senior Counsel  
Women's Rights Division Human Rights Watch  
350 Fifth Avenue, 34th Floor  
New York, NY 10118

Dear Ms. Kashyap,

Thank you for your letter regarding the benefits of transparency in garment and footwear supply chains. We share the goals of your supply chain initiative, as demonstrated by our public commitments to safe and ethical working conditions (for details, please visit [sustainability.aboutamazon.com/social-responsibility](https://sustainability.aboutamazon.com/social-responsibility)).

Our approach to sourcing responsibly is grounded in setting and holding high standards as outlined in our [Supply Chain Standards](#), engaging with suppliers to improve working conditions, developing strong supplier relationships, and collaborating with peers and multi-stakeholder groups. You can find additional details on our engagement with suppliers outlined in our [Supplier Manual](#).

The complex, persistent challenges in working conditions cannot be solved alone; improving supply chains requires collaboration. We believe supply chain transparency has the potential to enhance engagement with other businesses and industry partners, help hold suppliers accountable to our high standards, and accelerate industry changes to improve working conditions. This year we announced our partnership with the BSR's HERproject™, a collaborative initiative that strives to empower low-income women working in global supply chains. Bringing together global brands, their suppliers, and local NGOs, HERproject™ drives impact for women and businesses via workplace-based interventions on health, financial inclusion, and gender equality.

We are preparing to publish additional information regarding our supply chain and will share in the near term. We look forward to engaging you further on these efforts.

Sincerely,

Kara Hurst  
Head of Global Sustainability, Amazon



August 3, 2018

Mr. Jeffrey P. Bezos  
Founder and Chief Executive Officer  
Amazon.Com, Inc.  
via email: [REDACTED]

**Re: The Apparel and Footwear Supply Chain Transparency Pledge**

Dear Mr. Bezos,

Please accept our regards on behalf of the undersigned organizations.

A key part of our ongoing work focuses on promoting transparency in garment and footwear supply chains. We have regularly urged companies to disclose their supplier factory lists. We are writing to urge your company to adopt industry best practices in regards to such disclosures.

We urge apparel and footwear companies to publicly disclose their supplier factories' lists and advocate that companies adopt the Apparel and Footwear Supply Chain Transparency Pledge (Transparency Pledge), a basic minimum standard drawn on industry good practice which we have collectively endorsed (attached in Appendix I).

Over the course of late 2016 and early 2017, we reached out to 72 companies asking them to publicly disclose their supplier factories list in alignment with the Transparency Pledge, of which at least 17 companies aligned with the Pledge and many others have begun to disclose their supplier factory information publicly. These include adidas, ASICS, ASOS, C&A, Clarks, Cotton On Group,

Esprit, G-Star RAW, H&M Group, Hanesbrands, Levis, Lindex, New Look, Next, Nike, Patagonia, and Pentland Brands. Our April 2017 report, [Follow the Thread: The Need for Supply Chain Transparency in the Apparel and Footwear Industry](#), documents the results of our outreach and explains why we endorsed the Transparency Pledge.

Amazon falls behind existing leading industry practices in terms of disclosing supply chain information.

Transparency in supply chains is a powerful human rights due diligence tool, which can be utilized effectively to promote workers' rights. First, local unions and civil society organizations can more swiftly alert brand officials to worker rights concerns in its supply chain; second, they can also help the company keep track of undeclared units engaged in production without approval.

We call upon you to commit to publicly disclosing Amazon's own-brand supplier factories in accordance with the Transparency Pledge and implement this commitment in full, no later than January 2020.

Given Amazon's stature in the industry, we are particularly keen to have a positive written response to the Pledge so this may continue to be a force for change within the industry.

We look forward to a written response from you as soon as possible, but no later than August 31, 2018, indicating whether Amazon will align with the Transparency Pledge. All written responses may be sent to [transparency@hrw.org](mailto:transparency@hrw.org). Please note that all written responses, or lack thereof, will be reflected in our upcoming report, due to be published around the UN Forum for Business and Human Rights in 2018.

Best regards,

Aruna Kashyap, Senior Counsel, Human Rights Watch

Christy Hoffman, General Secretary, UNI Global Union

Ineke Zeldenrust, Clean Clothes Campaign International Office, Clean Clothes Campaign

Jana Morgan, Campaigns & Advocacy Director, International Corporate Accountability Roundtable

Judy Gearhart, Executive Director, International Labor Rights Forum

Lynda Yanz, Executive Director, Maquila Solidarity Network

Scott Nova, Executive Director, Worker Rights Consortium

Sharan Burrow, General Secretary, International Trade Union Confederation

Valter Sanches, General Secretary, IndustriALL Global Union

CC: Ms. Kara Hartnett Hurst, Head of Worldwide Sustainability

## Appendix I

### The Apparel and Footwear Supply Chain Transparency Pledge ("The Transparency Pledge")

This Transparency Pledge helps demonstrate apparel and footwear companies' commitment towards greater transparency in their manufacturing supply chain.

Transparency of a company's manufacturing supply chain better enables a company to collaborate with civil society in identifying, assessing, and avoiding actual or potential adverse human rights impacts. This is a critical step that strengthens a company's human rights due diligence.

Each company participating in this Transparency Pledge commits to taking **at least** the following steps:

#### **Publish Manufacturing Sites**

The company will publish on its website on a regular basis (such as twice a year) a list naming all sites that manufacture its products. The list should provide the following information in English:

1. The full name of all authorized production units and processing facilities.<sup>1</sup>
2. The site addresses.
3. The parent company of the business at the site.
4. Type of products made.<sup>2</sup>
5. Worker numbers at each site.<sup>3</sup>

Companies will publish the above information in a spreadsheet or other searchable format.

---

<sup>1</sup> Processing factories include printing, embroidery, laundry, and so on.

<sup>2</sup> Please indicate the broad category – apparel, footwear, home textile, accessories.

<sup>3</sup> Please indicate whether the site falls under the following categories by number of workers: Less than 1000 workers; 1001 to 5000 workers; 5001 to 10,000 workers; More than 10,000 workers.



August 3, 2018

Mr. Rubin Ritter, Co-CEO  
Mr. Robert Gentz, Co-CEO  
Mr. David Schneider, Co-CEO  
Zalando SE  
via email

**Re: The Apparel and Footwear Supply Chain Transparency Pledge**

Dear Mr. Ritter, Mr. Gentz, and Mr. Schneider:

Please accept our regards on behalf of the undersigned organizations.

A key part of our ongoing work focuses on promoting transparency in garment and footwear supply chains. We have regularly urged companies to disclose their supplier lists. We are writing to urge your company to adopt industry best practices in regards to such disclosures.

We urge apparel and footwear companies to publicly disclose their supplier factories' lists and advocate that companies adopt the Apparel and Footwear Supply Chain Transparency Pledge (Transparency Pledge), a basic minimum standard drawn on industry good practice which we have collectively endorsed (attached in Appendix I).

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Zalando falls behind existing leading industry practices in terms of disclosing supply chain information.

Transparency in supply chains is a powerful human rights due diligence tool, which can be utilized effectively to promote workers' rights. First, local unions and civil society organizations can more swiftly alert brand officials to worker rights concerns in its supply chain; second, they can also help the company keep track of undeclared units engaged in production without approval.

We call upon you to commit to publicly disclosing Zalando's own-brand supplier factories in accordance with the Transparency Pledge and implement this commitment in full, no later than January 2020.

Given Zalando's stature in the industry, we are particularly keen to have a positive written response to the Pledge so this may continue to be a force for change within the industry.

We look forward to a written response from you as soon as possible, but no later than August 31, 2018, indicating whether Zalando will align with the Transparency Pledge. All written responses may be sent to [transparency@hrw.org](mailto:transparency@hrw.org). Please note that all written responses, or lack thereof, will be reflected in our upcoming report, due to be published around the UN Forum for Business and Human Rights in 2018.

Best regards,

Aruna Kashyap, Senior Counsel, Human Rights Watch

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Ineke Zeldenrust, Clean Clothes Campaign International Office, Clean Clothes Campaign

Jana Morgan, Campaigns & Advocacy Director, International Corporate Accountability Roundtable

Judy Gearhart, Executive Director, International Labor Rights Forum

Lynda Yanz, Executive Director, Maquila Solidarity Network

Scott Nova, Executive Director, Worker Rights Consortium

Sharan Burrow, General Secretary, International Trade Union Confederation

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5. Worker numbers at each site.<sup>3</sup>

Companies will publish the above information in a spreadsheet or other searchable format.

---

<sup>1</sup> Processing factories include printing, embroidery, laundry, and so on.

<sup>2</sup> Please indicate the broad category – apparel, footwear, home textile, accessories.

<sup>3</sup> Please indicate whether the site falls under the following categories by number of workers: Less than 1000 workers; 1001 to 5000 workers; 5001 to 10,000 workers; More than 10,000 workers.