

# FASHION TRANSPARENCY INDEX

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## 2020 EDITION

A review of 250 of the biggest global fashion brands and retailers ranked according to how much they disclose about their social and environmental policies, practices and impacts.

FASHION  
REVOLUTION

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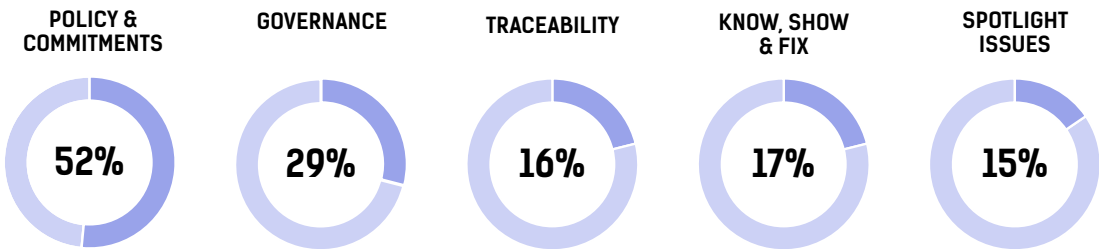
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# KEY FINDINGS

**23%** overall average score across the 250 brands reviewed

- Up 2 percentage points since 2019 (200 brands)
- Up 3 percentage points since 2017 (100 brands)

## AVERAGE SCORE IN EACH SECTION



### TOP 10 SCORES IN 2020 (%)

H&M (H&M Group)	73%
C&A	70%
Adidas/Reebok	69%
Esprit	64%
Marks & Spencer	60%
Patagonia	60%
The North Face / Timberland / Vans / Wrangler (VF Corp)	59%
Puma	57%
ASOS	55%
Converse / Jordan / Nike (Nike Inc.)	55%

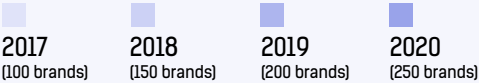
### LOWEST SCORING BRANDS IN 2020 (%)

Bally	0
Belle	0
Elie Tahari	0
Heilan Home	0
Jessica Simpson	0
Max Mara	0
Mexx	0
Pepe Jeans	0
Tom Ford	0
Youngor	0

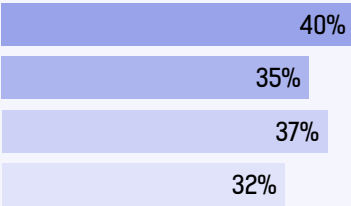
### TOP 10 MOVERS SINCE 2019

Monsoon	+23
Ermenegildo Zegna	+22
Sainsbury's-TU Clothing	+19
Dressmann	+17
ASICS	+15
Urban Outfitters / Anthropologie	+15
Clarks	+14
Pimkie	+13
River Island	+13
Russell Athletic	+13

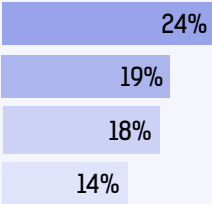
Percentage of brands publishing suppliers lists



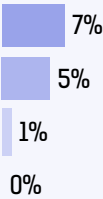
First-tier manufacturers



Processing facilities



Suppliers of raw materials



HIGHEST SCORING BRANDS SINCE 2017

2020	2019
H&M (H&M Group) 73%	Adidas/Reebok 64%
C&A 70%	Patagonia 64%
Adidas/Reebok 69%	Esprit 62%
Esprit 64%	H&M (H&M Group) 61%
Patagonia / Marks & Spencer 60%	C&A 60%

2018	2017
Adidas/Reebok 58%	Adidas/Reebok 49%
Puma 56%	Marks & Spencer 48%
H&M (H&M Group) 55%	H&M (H&M Group) 48%
Esprit 54%	Puma 46%
Gap 54%	Gap 46%

25%

overall average score across the 198 brands reviewed in 2019 and 2020

Up 3 percentage points since 2019

28%

overall average score across the 148 brands reviewed since 2018

Up 7 percentage points since 2018

32%

overall average score across the 98 brands reviewed since 2017

Up 12 percentage points since 2017

# EXECUTIVE SUMMARY

## About the Fashion Transparency Index 2020

We are pleased to deliver our fifth annual Fashion Transparency Index 2020, which reviews and ranks 250 of the world's largest fashion brands and retailers according to how much they disclose about their social and environmental policies, practices and impacts.

This year we reviewed an additional 50 brands and retailers, including major brands from Australia, India, New Zealand, Norway, Poland, South Africa and Switzerland for the first time. We also added in several e-retailers this year, including Fashion Nova (USA), Koovs (India) and Pretty Little Thing (UK).

The Fashion Transparency Index comprises 220 indicators covering a wide range of social and environmental topics such as animal welfare, biodiversity, chemicals, climate, due diligence, forced labour, freedom of association, gender equality, living wages, purchasing practices, supplier disclosure, waste and recycling, working conditions and more.

## High street brands lead on transparency but luxury brands are making progress

H&M (H&M Group) is the highest scoring brand this year at 73% of the 250 possible points, followed by C&A at 70%, Adidas and Reebok at 69% and Esprit at 64%.

The overall average score among the 250 brands is 23% (up from 21% among the 200 brands in 2019).

Gucci is the highest scoring luxury brand at 48%, up from 40% in 2019, and is the only brand to score 100% on Policy and Commitments. The other Kering Group brands we reviewed come in just behind Gucci, including Balenciaga (47%), Saint Laurent (47%) and Bottega Veneta (46%)

Ermenegildo Zegna has become the first luxury brand to publish a detailed supplier list. However, Hermès has disclosed many of its owned and operated manufacturers and suppliers for many years. Meanwhile, Balenciaga, Bottega Veneta, Gucci and Saint Laurent have also published a handful of raw material suppliers this year. We hope to see more luxury brands follow their lead.

## The majority of brands and retailers lack transparency on social and environmental issues

More than half (54%) of brands score 20% or less. However, there are fewer low-scoring brands this year compared to 2019. 28% of brands score 10% or less, compared to 36% of brands last year.

Of the new brands added to the Index in 2020, 15 brands score 5% or less, including Canada Goose, Fashion Nova, Pepe Jeans and DKNY.

Brands that disclose nothing at all include Swiss luxury brand Bally, ready-to-wear brand Elie Tahari, Jessica Simpson's eponymous brand, Dutch high street brand Mexx and Chinese retailers Belle, Heilan Home and Youngor.

## Participation in the Fashion Transparency Index is influencing brands to disclose more social and environmental information

Brands that participated in the Fashion Transparency Index 2020 (by completing our questionnaire) have achieved an overall average score of 35% (compared to 23% overall average among all 250 brands.) Non-participating brands achieved an overall average score of 11%.

Every brand in the top 20% of scores in 2020 and all brands scoring above 40% participated in the Fashion Transparency Index this year.

However, the scores of approximately 30 brands have barely changed from 2017 to 2020, including Gap, Uniqlo and Walmart, among others. This means they have not taken significant steps towards increasing transparency within the past three years, compared to other brands.

## Brands continue to publish more about their policies than how they implement them

As in previous editions of the Index, brands disclose more about their policies than they do about how they put those policies into action. Brands disclose comparatively less about the outcomes, results and progress they have made to address social and environmental issues in the business and across the supply chain.

This is illustrated by the fact that the overall average score among brands in the Policy and Commitments section is 52% while all other sections' average scores are less than 30%.

The good news is that brands are publishing more policies than they were in previous years (52% section average score in 2020, compared to 48% in 2019), but brands continue to lack transparency when it comes to the types of information that enables external stakeholders to hold them to account, e.g. detailed supplier lists, audit results, wage data, climate impact data and so on.

## Information dumping is an ongoing problem

Information and data dumping almost seems like a deliberate strategy by some of the brands. For quite a few brands, we have found information repeated over and over again across different web pages and documents, often with slightly different terminology but no substantive difference. Sometimes brands use a large amount of filler words and fluffy explanations and details that obscure what information or data is actually relevant and useful to external stakeholders. We have even found instances of conflicting facts and statistics.

For whatever reason this happens, it makes it extremely difficult for people to make sense of what relevant information is actually disclosed by brands. It can be counterproductive to transparency and accountability. Not everyone has the hours and days it can sometimes take to decipher what brands are actually disclosing and how to use this information in an effective way.

The brands that communicate best are those that set out what they are doing in a succinct, logical yet still detailed way. They also avoid using difficult industry jargon or fluffy storytelling devices that don't actually tell you much.

## Encouraging progress made on disclosing supplier lists

40% of brands (101 out of 250) are publishing their manufacturers (up from 35% in 2019). 24% of brands (60 out of 250) are publishing some of their processing facilities and/or mills (up from 19% in 2019). 7% of brands (18 out of 250) are publishing some of their raw material suppliers (up from 5% in 2019).

We have seen the overall average score on traceability increase to 16%, up from 12% in 2019 and 8% in 2017.

Next year, we hope to see 50% (or more) of brands publishing a supplier list and more brands disclosing their processing facilities, mills, tanneries and raw material suppliers further down the tiers of the supply chain.

Also, look later in the report for four case studies we have highlighted showing how journalists and workers rights organisations are using supplier lists to address and remedy poor working conditions in the supply chains of major brands.

## Continued lack of transparency on living wages for workers in the supply chain

As in previous editions of the Index, the majority of brands and retailers publish little information about their efforts, if any, to improve pay and achieve living wages in the supply chain. Less than a quarter (23%) of brands disclose the company's approach to achieving the payment of living wages to workers in the supply chain.

Only 5 brands (2%) publish a time-bound, measurable roadmap or strategy for how they will achieve a living wage for all workers across their supply chains. Meanwhile, only 5 brands (2%) publish data on the percentage above the minimum wage rate workers are paid in their supply chains.

This is an urgent issue for so many workers in the textile supply chain who struggle to afford life's basic necessities. While it is a complex issue to solve, without more collective action and greater transparency from major brands and retailers, it will be a very long time before workers are paid decent and fair wages.

## Most brands do not disclose any information about their purchasing practices

Responsible purchasing practices go hand-in-hand with the ability of suppliers to pay workers adequate and reliable wages. Yet, on the whole, brands disclose alarmingly little about what they're doing to be good business partners to their suppliers.

Only 11% of brands explain how they ensure that labour costs are ring-fenced and non-negotiable in price negotiations, and only 6% of brands publish a policy to pay suppliers within 60 days.

## The coronavirus pandemic is proving why transparency is so vital

If major brands and retailers are publishing information about their business values, who their suppliers are, what supply chain policies are in place, how they do business with suppliers and their purchasing practices, then stakeholders can hold them to account for exactly the type of situation unfolding now where major brands are stopping and delaying payments and cancelling orders from their suppliers with little regard for how this will affect the livelihoods of workers across the supply chain.

## Coronavirus is casting a spotlight on overconsumption

As people are forced to stay at home and retail stores are closed around the world, the demand for clothing has plummeted since the start of the year. It is causing people to reassess and reprioritise what they spend money on.

Francesca Muston, fashion director for global trend forecaster WGSN, told journalist Marc Bain that fashion's frantic turnover of trends could slow down, while companies start to focus on delivering fewer, better quality products to remain profitable.

This is why it is interesting to see that so few brands currently publish data about their annual production volume and the brands that do report staggering numbers. For example, Inditex (the parent company that owns Bershka, Massimo Dutti, Pull&Bear, Stradivarius and Zara) produced more than 1.6 billion items last year.

Furthermore, several media outlets report that dozens of brands have stopped taking deliveries while clothing is piling up in warehouses during the lockdown. We wonder what will happen to all of these clothes considering that our research shows only 27% of brands publish information about the steps they are taking to reduce the amount of waste created before clothes hit the shelves, and only 18% of brands explain what they are doing to develop circular solutions that enable textile-to-textile recycling.

## The climate crisis is an increasingly important issue for brands but more transparency is needed on what brands are doing to reduce impacts

78% of major brands publish a company policy on energy use and carbon emissions (up from 72% last year), while 52% publish a supplier policy on this topic (up from 49% last year).

However, only 16% of brands publish Science Based Targets, which means their environmental goals are aligned with the Paris Agreement's aim to limit global heating to below 2°C above pre-industrial levels.

And, only 16% of brands publish annual carbon emissions produced within their supply chains – where the highest proportion of carbon is emitted across the lifecycle of a garment.

## Taking action on these findings

The Fashion Transparency Index has enabled us to have constructive conversations with some of the world's largest fashion brands and retailers about what they can do to be more transparent.

We believe transparency is the first step in holding these big brands to account for the human rights and environmental impacts of their business practices.

We will continue to use the Index to measure brands' annual progress on transparency and to push them harder and faster towards taking greater responsibility for their policies and actions on social and environmental issues.

**We invite you to read the rest of the report for a deeper dive into the 2020 results.**

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# "The hidden and forgotten dwell in the shadows of our clothes."

Carry Somers - co-founder, Fashion Revolution



# 1 ABOUT THIS REPORT





# WHY TRANSPARENCY MATTERS

## Lack of transparency costs lives

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

In some cases, it took weeks for brands to determine why their labels were found in the ruins and what sort of purchasing agreements they had with those suppliers. This is because the vast majority of today's fashion brands and retailers do not own their manufacturing and supplier facilities, making it challenging to control and monitor building and fire safety, working conditions and environmental management across a highly globalised and fragmented supply chain.

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

Since Rana Plaza, tragic and fatal factory fires and accidents, poor and exploitative working conditions, pollution and environmental degradation remain rife throughout the global fashion supply chain.

Simply put, if we don't know where and by whom our clothes are being made, then it is difficult to for relevant stakeholders to work together to fix problems before they end in tragedy.

## Consumers want to know #WhoMadeMyClothes

Business of Fashion recently wrote, "Fashion companies must come to terms with the fact that a more distrusting consumer expects full transparency across the value chain... consumers have become more active in scrutinising the brands they do business with."

When consumers are equipped with more – and better quality, credible – information about the social and environmental impacts of the clothes they buy, they are able to make better informed decisions. As a result, transparency builds trust in the brands they buy and a lack of transparency can damage brands' reputation.



[TOP] 2014, Relatives of those killed in the collapse of Rana Plaza rally for changes in working conditions, Andrew Biraj for Reuters.

[BOTTOM] 2019, A mourner of a victim of the New Delhi Factory Fire, Saumya Khandelwal for The New York Times

# WHAT DO WE MEAN BY TRANSPARENCY?

## **TRANSPARENCY**

[noun]

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

### **Transparency means public disclosure**

Transparency is more than just sharing the good work that brands are doing. Too often we see brands boasting about their business values and positive progress without sharing much about the things that go wrong, the systemic challenges they face and the actual honest results of their efforts to protect human rights and the environment. This can come across as greenwashing.

It is also not enough to disclose crucial supply chain information internally or selectively to certain stakeholders only. This is how brands have operated for a very long time, yet widespread abuses remain endemic across the industry. True transparency requires public disclosure.

### **If done well, transparency should enable accountability**

Transparency enables others to scrutinise what companies say they are doing to address human rights and protect the environment. It means that there is information available for which others (consumers, investors, lawmakers, journalists, NGOs, trade unions, workers themselves) can hold brands and retailers to account for their policies and practices, especially when things go wrong like it did that day at Rana Plaza.

Being transparent doesn't mean that companies are behaving in a responsible and sustainable manner. A brand may publish a considerable amount of information about its policies, practices and impacts and still be contributing to poor working conditions and environmental degradation. On the other hand, brands may be doing excellent work behind the scenes to make improvements, but if they don't share this information publicly then no one may know about it and this learning cannot be shared more widely with others who may find it useful.

### **Transparency is a tool for change, not the end goal**

Transparency is not a silver bullet that will solve the many complex and deeply systemic problems in the global fashion industry. However, transparency provides a window into the conditions in which our clothes are being made and allows us to address them more quickly and collaboratively.

Transparency isn't just for transparency's sake. The information disclosed by companies needs to be accessible and detailed enough to take action upon. What each of us does with this public disclosure, how we use it to drive positive change, is what will count most. In this sense, we see transparency as the first crucial step towards systemic and structural change in the global fashion industry.

# PURPOSE OF THE RESEARCH

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

To build upon this question, our community asked us to help them make sense of the social and environmental information being shared by major brands and retailers.

Our community wants to know what information they should expect to find disclosed by major brands, what it means, how to put the information they find into a wider context and how to make use of this information to drive change. We created the Fashion Transparency Index for this purpose.

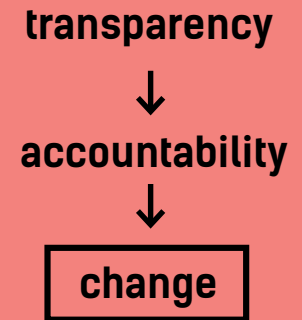
We designed the Index to:

- Compare the level of transparency among the world's largest fashion brands and retailers;
- Incentivise major brands and retailers to disclose a greater level of credible, comparable and detailed information year-on-year by leveraging their competitive tendencies;
- Analyse trends in transparency across the global fashion industry;
- Inform our own understanding of what good transparency looks like and use that learning to help shape our ongoing campaigning efforts.

Although it hasn't necessarily been our intention, participating brands and retailers have told us that the Index is a useful exercise for them to take stock of what they are disclosing and where they have room to improve.

## **This is not a shopping guide.**

The Fashion Transparency Index is not an indication of whether particular brands are 'good' or 'bad'. We are not recommending or endorsing any of the brands and retailers reviewed, regardless of their scores. The purpose is to understand how much social and environmental information is shared by the world's largest brands, to drive greater disclosure from them and to use this information to hold them to account when needed.



# ABOUT THE METHODOLOGY

The Fashion Transparency Index uses a ratings methodology to benchmark the public disclosure made by brands and retailers across five key areas:

- Social and environmental policy and commitments
- Governance
- Supply chain traceability
- Know, show and fix (supply chain due diligence and remediation)
- Spotlight issues (working conditions, consumption, product/material composition and climate)

Brands receive points for information that has been publicly disclosed on the brand or parent company website, through self-published annual reports and via third parties where there is a link between the company's website and the third party disclosure.

The methodology was designed in 2017 through a four-month consultative process. We relied upon the pro-bono input of a diverse group of industry experts and stakeholders from academia, the trade union movement, civil society organisations, socially responsible investment, business consulting and journalism. Among others, this includes:

- Dr. Mark Anner, Director of Centre for Global Workers' Rights at Penn State University
- Neil Brown, Liontrust Asset Management PLC
- Professor Ian Cook, University of Exeter
- Subindu Garkhel, Fairtrade Foundation
- Christina Hajagos-Clausen, IndustriALL Global Union
- Kristian Hardiman, Good On You
- Aruna Kashyap, Human Rights Watch
- Kate Larsen, SupplyESChange Initiative
- Dr. Alessandra Mezzadri, SOAS, University of London
- Katie Shaw, Open Apparel Registry
- Francois Souchet, Ellen MacArthur Foundation
- Joe Sutcliffe, Advisor – Dignified Work, CARE International
- Ben Vanpeperstraete, human rights expert

**To explore  
the detailed  
methodology  
[click here.](#)**

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

# ANNUAL UPDATES TO THE METHODOLOGY

In consultation with these experts, each year we update the methodology in order to clarify language, select new annual Spotlight Issues and ensure that it stays current and acts as a driver of industry best practice on transparency.

The methodology is also based upon alignment with existing international standards and benchmarks such as the UN Guiding Principles and SDGs, OECD Due Diligence Guidelines, ILO conventions, ACT, Know The Chain, IHRB Responsible Recruitment Toolkit and the Transparency Pledge.

In the 2020 methodology, there are 220 indicators. Across 250 brands, this means we have researched and analysed 55,000 individual data points. The weighting of the scores is intended to emphasise increasing levels of detailed and granular disclosure. In other words, we reward disclosure that enables external stakeholders to meaningfully use that information to hold brands to account; for example, supplier lists, audit findings, wage data, etc.

Changes to the methodology may affect year-on-year comparability of the results. Where brands may have scored one or two percentage points up or down compared to last year this could be due to changes in the methodology. There are other notable limits to this type of desk-based research. Human error is entirely possible. Some brands publish annual reports that span +400 pages, with footnotes and appendices. It is quite possible our research team (or even brands themselves) may have missed relevant disclosure. Also, the data captures a moment in time and is only as current as of 31st March 2020. Brands may disclose or retract information at a later date. However, we try our best to be as thorough, meticulous, objective and fair as possible.

This is why we urge you to focus on the ranges in which brands score rather than their individual scores. The ranges reveal patterns of industry disclosure rather than precise measurements.

Finally, we would like to stress that the Index does not offer an in-depth analysis of the quality, authenticity or accuracy of brands' policies, procedures, performance and progress in any given area. Verification of claims made by brands and retailers is beyond the scope of this research. We hope you use this information to query their claims.

## How we calculate the findings:

- All scores have been calculated to two decimal places (in the complete data set) and then rounded to the nearest whole percentage point (what you will read in this report).
- For the most part, year-on-year differences in scores are described as the change in percentage points, which means the actual amount of change, rather than the percent, which means the rate of change (unless explicitly stated otherwise). For instance, if a brand scored 30% in one year and 45% in the next, we are usually reporting that the brand increased by 15 percentage points (45-30=15) rather than saying the brand increased by a 50% rate of change (45/30=1.5).
- All averages in this report represent the mean.
- Where a score may have been rounded to the nearest percentage point in previous editions, we are calculating the year-on-year difference according to the rounded figures rather than to the exact decimal points. For example, where the average score in a particular section is 17.74% we have rounded this up to 18%. If a previous year's report the average score in that section was 12.41% we rounded it down to 12% in the report. Therefore, the year-on-year difference is technically 5.33 percentage points, but if we go by the nearest rounded figures it is 6 percentage points.

# WEIGHTING OF THE SCORES

1.

**POLICY & COMMITMENTS**

This section explores brands’ social and environmental policies for both their own employees and workers in the supply chain, how these policies are implemented, how the company prioritises issues, what goals it has in place and if they’re reporting annual progress.

2.

**GOVERNANCE**

Here we look at who on the executive board has responsibility for social and environmental performance, how this is implemented, how social and environmental improvements are linked to employee, CEO and supplier performance, and whether the relevant department and person in charge can be easily contacted by the public.

3.

**TRACEABILITY**

In this section we look for brands to publish supplier lists at three levels: manufacturing, processing facilities and mills, and raw materials. We also look for extra details such as supplier address, number of workers, gender breakdown, number of migrant workers, union representation and when the list was last updated.

4.

**KNOW, SHOW & FIX**

Here we review what brands disclose about their due diligence processes, how they assess suppliers against their policies, what are the results of these assessments, what do they do when problems are found, how workers can file complaints and how these are addressed.

5.

**SPOTLIGHT ISSUES**

In this final section we explore what brands are doing to address forced labour, gender equality, living wages, freedom of association, waste, circularity, overproduction, use of more sustainable materials, microplastics, deforestation, climate change and water use.

**WEIGHTING**  
[%]

18.8%

4.8%

31.6%

25.2%

19.6%



# HOW THE RESEARCH IS CONDUCTED

The research is led by Fashion Revolution's Global Policy Director Sarah Ditty; Project Manager, Ilshio Lovejoy; and Project Coordinator, Sienna Somers – with support from Fashion Revolution's co-founder and Global Operations Director, Carry Somers.

Additional research was carried out by:

- Nicky Allan
- Clara Buckens
- Altaire Cambata
- Ysabl Dobles
- Rachel Hartley
- Michelle Lai
- Lisa Schneider
- Lian Sing
- Manon Thomas

# RESEARCH PROCESS

August – November 2019

**Methodology updates:** Industry research and consultation process informs how we select new Spotlight Issues, devise new indicators and tweak any others. The brand questionnaire is prepared. During this time, we also research and select the additional 50 brands and retailers to be reviewed.

December 2019 – January 2020

**Research the selected brands and retailers:** Our researchers review each brand and pre-populate their questionnaire with evidence of the relevant public disclosure and award them preliminary points. At this time, brands are notified of their inclusion in this year's Index and invited to participate.

Mid-March

**Brands return completed questionnaires:** Brands that choose to participate return their completed questionnaires. Our research team reviews responses and awards additional points where sufficient disclosure has been made.

Mid-February

**Brands receive questionnaires to complete:** Brands are given approximately one month to fill in the gaps on their brand questionnaires, alerting us to information our researchers may not have found.

Early February

**Data quality assurance check:** Each indicator is checked by at least two different lead researchers for accuracy and consistency across all 250 brand questionnaires.

Late March

**Questionnaire responses reviewed and quality assurance check:** The research team conducts several rounds of data quality assurance checks before finalising each questionnaire and the scoring.

Early to mid-April

**Data is compiled, analysis completed and report prepared:** Data from each brand questionnaire is collated into one large complete dataset, which is used to analyse final results, determine year-on-year progress and pull out interesting findings. Brands are notified of their final scores and progress shortly before publication.

# HOW BRANDS AND RETAILERS ARE SELECTED

The 250 brands and retailers have been chosen on the basis of their annual turnover, over \$400 million USD, and representing a spread of market segments including high street, luxury, sportswear, accessories, footwear and denim from across Europe, North America, South America, Asia and Africa.

We relied upon publicly available financial information to research brands and retailers. Some companies are privately held and do not publish financial records. This means that some very large brands are not on our radar. When several brands are owned by a large parent company and they do not disclose turnover by brand, we make an educated guess as to the biggest selling brand(s) in the group to include in our research.

We have chosen to list brand names in this report rather than by parent company or group because consumers will be most familiar with brand names. However, please note that for some of the brands that are part of a group, such as H&M (H&M Group) Group, Inditex, PVH and others, their scores reflect all brands in the group regardless of whether they appear in our report.

This year 53% of brands participated by returning a completed questionnaire. We include brands in the Index regardless of whether they participate or not. However, brands that participate typically receive higher scores than they would otherwise because they are able to identify relevant disclosure that our researchers may have missed.

## HOW MANY BRANDS PARTICIPATED THIS YEAR?

**45%**

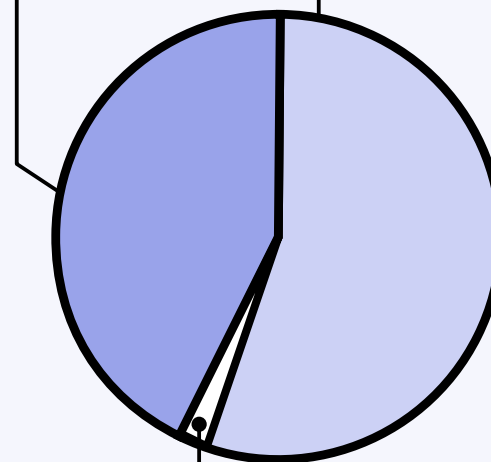
did not respond

**53%**

of brands completed and returned a questionnaire

**2%**

declined the opportunity to complete the questionnaire



# A-Z OF BRANDS

● = participated in brand questionnaire

Abercrombie & Fitch (Abercrombie & Fitch) ●  
Adidas (Adidas Group) ●  
Aeropostale  
ALDI Nord (ALDI Einkauf GmbH & Co. oHG)  
ALDI SOUTH (ALDI Einkauf GmbH & Co. oHG) ●  
ALDO (The Aldo Group Inc.) ●  
Amazon (Amazon.com, Inc.) ●  
American Eagle ●  
ANTA  
Anthropologie (URBN) ●  
Aritzia ●  
Armani (Giorgio Armani S.p.A) ●  
ASDA (Walmart Inc.) ●  
ASICS ●  
ASOS ●  
Balenciaga (Kering) ●  
Bally (Shandong Ruyi Group)  
Banana Republic (Gap Inc.) ●  
BCBGMAXAZRIA (Centric Brands) ●  
Beanpole (Samsung C&T)  
BeLLE  
Bershka (Inditex) ●  
Big Bazaar – ffb (Future Group)  
Big W (Woolworths Group) ●  
Billabong (Boardriders)  
Bloomingdale's (Macy's Inc.)  
Bonprix (Otto Group) ●  
boohoo (boohoo group plc)  
Bosideng  
Bottega Veneta (Kering) ●  
Brooks Brothers  
Brooks Sports (Berkshire Hathaway) ●  
Brunello Cucinelli  
Buckle  
Burberry ●  
Burlington  
C&A ●  
Calvin Klein (PVH) ●  
Calzedonia (Calzedonia Group)  
Canada Goose  
Carhartt  
Carolina Herrera (Puig)  
CAROLL (Vivarte)  
Carrefour  
Cato Fashions  
CELINE (LVMH) ●  
celio  
Champion (Hanesbrands Inc.)  
Chanel  
Chico's

Chloé (Richemont)  
Claire's  
Clarks ●  
COACH (Tapestry, Inc.) ●  
Cole Haan  
Columbia Sportswear ●  
Converse (Nike, Inc.) ●  
Cortefiel (Tendam) ●  
Costco  
Cotton On (Cotton On Group)  
Debenhams ●  
Decathlon (Association Familiale Mulliez) ●  
Desigual ●  
Diane Von Furstenberg  
Dick's Sporting Goods ●  
Diesel (OTB Group)  
Dillards  
Dior (LVMH) ●  
Disney (The Walt Disney Group)  
DKNY (G–III Apparel Group)  
Dolce & Gabbana  
Dr. Martens (Permira) ●  
Dressmann (VARNER) ●  
DSW (Designer Brands)  
Eddie Bauer (Golden Gate Capital)  
El Corte Inglés ●  
Elie Tahari  
Ermenegildo Zegna ●  
Esprit ●  
Express  
Falabella ●  
Famous Footwear (Caleres)  
Fanatics (Kynetic)  
Fashion Nova  
Fendi (LVMH) ●  
Fila  
Fjällräven (Fenix Outdoor) ●  
Foot Locker  
Forever 21  
Foschini (TFG) ●  
Fossil (Fossil Group, Inc.) ●  
Free people (URBN) ●  
Furla ●  
Gap (Gap Inc.) ●  
Gerry Weber  
Gildan ●  
G–Star RAW ●  
Gucci (Kering) ●  
GUESS  
H&M (H&M Group) ●

Hanes (Hanesbrands Inc.)  
Heilan Home (Helian Group Co.)  
Helly Hansen (Canadian Tire Corporation) ●  
HEMA ●  
Hermès  
Hollister Co. (Abercrombie and Fitch) ●  
Hudson's Bay (HBC) ●  
Hugo Boss ●  
Intimissimi (Calzedonia Group)  
Ito-Yokado (Seven & I Holdings Co)  
J.Crew ●  
Jack & Jones (BESTSELLER) ●  
JCPenney  
JD Sports (Pentland Group) ●  
Jessica Simpson (Sequential Brands Group)  
Jil Sander (Onward Holdings)  
Jockey  
Joe Fresh (Loblaw Company Ltd.)  
John Lewis ●  
Jordan (Nike, Inc.) ●  
JustFab (TechStyle Fashion Group)  
Kate Spade (Tapestry, Inc.) ●  
Kathmandu ●  
Kaufland  
KIK ●  
Kmart (Sears Holdings)  
Kmart Australia (Wesfarmers) ●  
Kohl's  
Koovs  
K–Way (BasicNet)  
La Redoute (Galeries Lafayette Group)  
Lacoste (Maus Frères) ●  
Lands' End  
Levi Strauss & Co ●  
Lidl ●  
Lindex (Stockmann Group) ●  
Li–Ning  
L.L. Bean  
LOFT (Ascena Retail Group Inc.) ●  
Longchamp  
Louis Vuitton (LVMH) ●  
Lululemon ●  
Macy's (Macy's Inc.)  
Mammut (Conzzeta AG) ●  
Mango ●  
Marc Jacobs (LVMH) ●  
Marks & Spencer ●  
Marni (OTB Group)  
Massimo Dutti (Inditex) ●  
Matalan ●

Max Mara  
Merrell (Wolverine World Wide, Inc.)  
Meters/bonwe  
Mexx  
Michael Kors (Capri Holdings Limited)  
Miu Miu (Prada Group) ●  
Mizuno ●  
Moncler  
Monoprix (Groupe Casino)  
Monsoon ●  
Morrisons ●  
MRP ●  
Muji (Ryohin Keikaku Co.) ●  
Neiman Marcus  
New Balance ●  
New Look ●  
New York & Company  
New Yorker  
Next ●  
Nike (Nike, Inc.) ●  
Nine West  
Nordstrom ●  
Old Navy (Gap Inc.) ●  
OTTO (Otto Group)  
OVS ●  
Patagonia ●  
Pepe Jeans  
Pimkie  
Prada (Prada Group) ●  
PrettyLittleThing (boohoo group plc)  
Primark (Associated British Foods plc) ●  
Prisma (S Group) ●  
Pull&Bear (Inditex) ●  
Puma ●  
Quiksilver (Boardriders)  
Ralph Lauren ●  
Reebok (Adidas AG) ●  
REI Co-op ●  
Reliance Trends (Reliance Retail)  
Reserved (LPP) ●  
REVOLVE  
River Island ●  
Ross Dress for Less  
Roxy (Boardriders)  
Russell Athletic (Fruit of the Loom) ●  
s.Oliver ●  
Sainsbury's–TU Clothing ●  
SAINT LAURENT (Kering) ●  
Saks Fifth Avenue (Hudson's Bay Company)  
Salvatore Ferragamo ●

Sandro (SMCP)  
Skechers  
Speedo (Pentland Group) ●  
Sports Direct  
Steve Madden  
Stradivarius (Inditex) ●  
Superdry ●  
Takko  
Target ●  
Target Australia (Wesfarmers) ●  
Tchibo ●  
Ted Baker ●  
Tesco ●  
Tezenis (Calzedonia Group)  
The Children's Place  
The North Face (VF Corporation) ●  
The Warehouse  
Timberland (VF Corporation) ●  
TJ Maxx (TJX)  
Tod's  
Tom Ford  
Tom Tailor ●  
Tommy Bahama (Oxford Industries, Inc.)  
Tommy Hilfiger (PVH) ●  
Topman (Arcadia Group) ●  
Topshop (Arcadia Group) ●  
TOPVALU COLLECTION (AEON)  
Tory Burch  
Triumph  
Truworths  
UGG (Deckers Brands)  
Under Armour  
Uniqlo (Fast Retailing) ●  
United Arrows ●  
United Colors of Benetton ●  
Urban Outfitters (URBN) ●  
Valentino  
Van Heusen (PVH) ●  
Vans (VF Corporation) ●  
Vero Moda (BESTSELLER) ●  
Versace (Capri Holdings)  
Very (The Very Group) ●  
Victoria's Secret (L Brands)  
Walmart (Walmart Inc.) ●  
Woolworths (Woolworths Holdings Limited) ●  
Wrangler (VF Corporation) ●  
Youngor  
Zalando ●  
Zara (Inditex) ●  
Zeeman ●

2

# THE FINAL SCORES

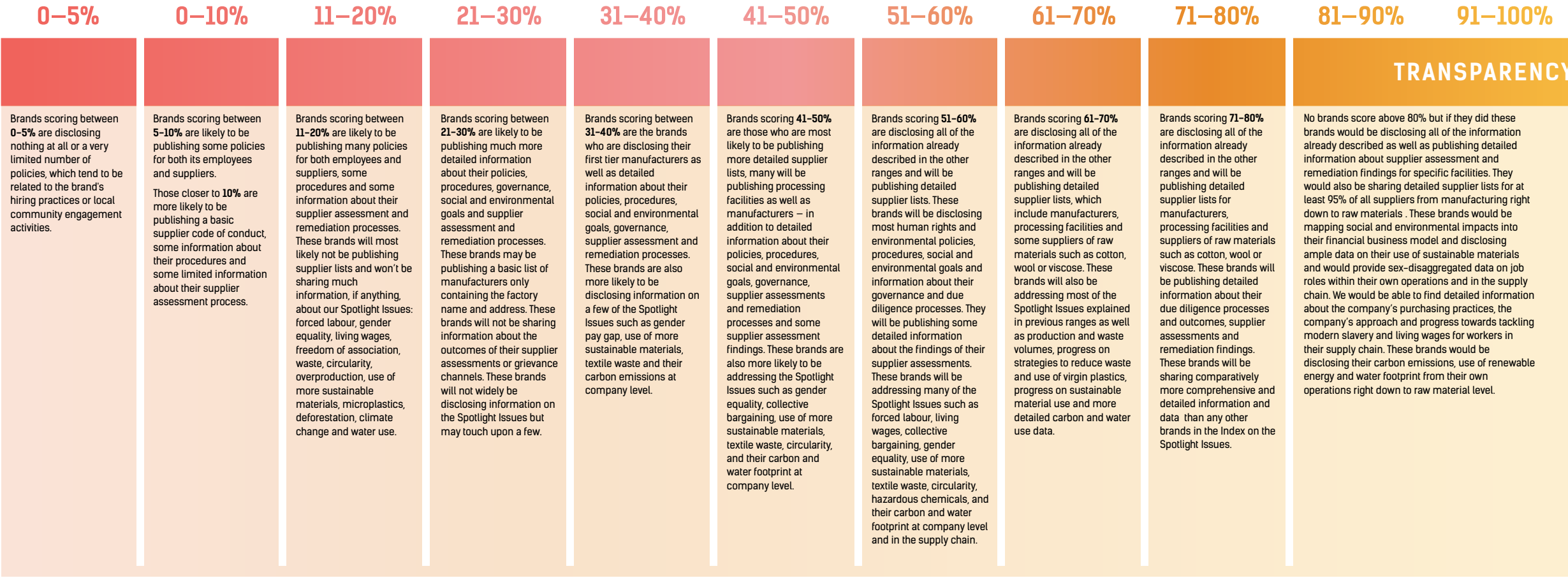
To access the complete data set [click here.](#)

To review full data findings for individual brands, visit [wikirate.org](https://wikirate.org)



# A GUIDE TO THE SCORING

There are 250 total possible points. Final scores have been converted into percentages and rounded to the nearest whole number. Please focus on the range in which brands score rather than their individual scores as this gives you a more accurate picture of trends in transparency across the industry.





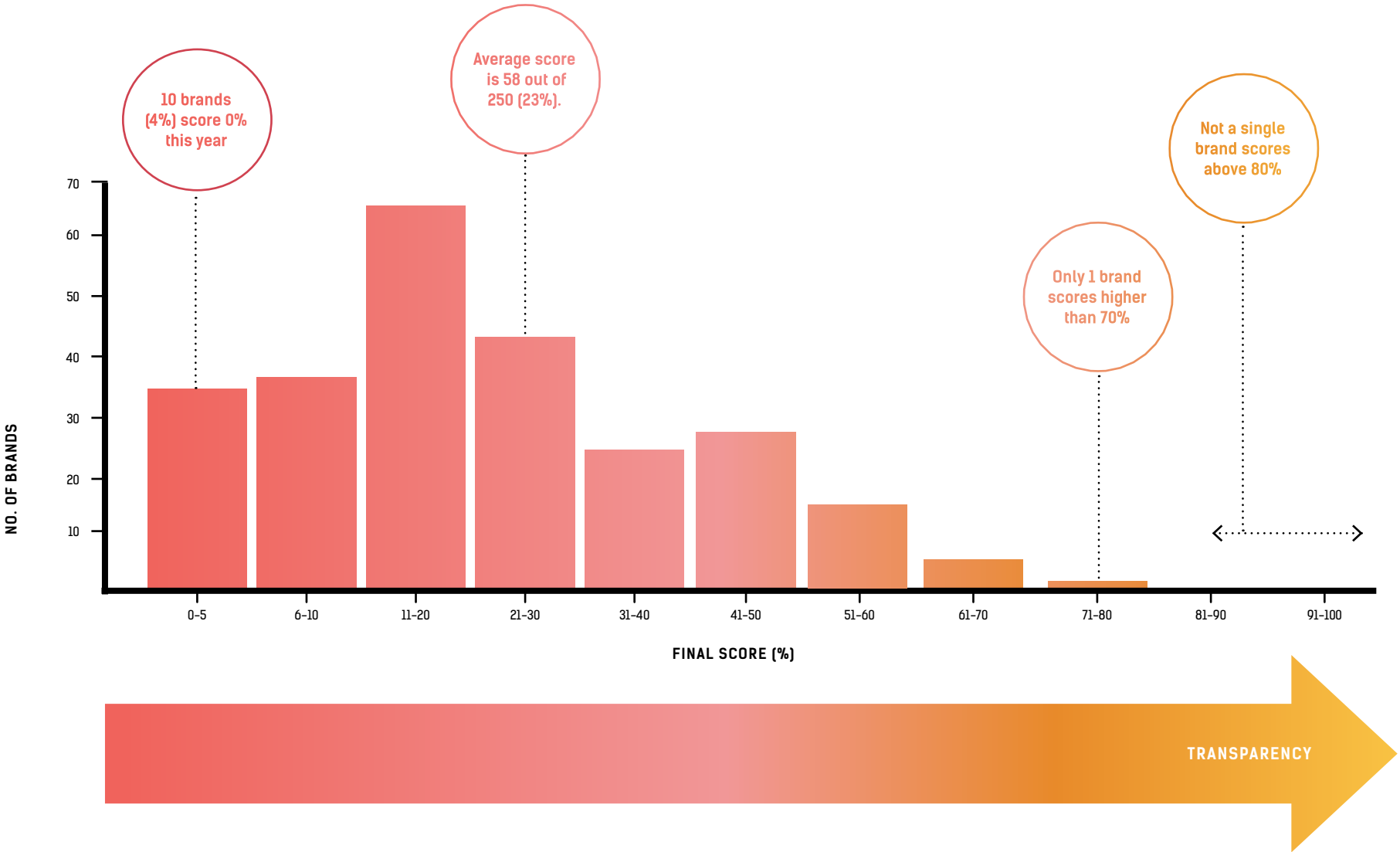
# THE FINAL SCORES

0-5%		6-10%		11-20%		21-30%		31-40%		41-50%		51-60%		61-70%		71-80%		81-90%		91-100%	
Brooks Brothers	5	Buckle	10	Anthropologie	20	ALDI SOUTH	30	Clarks	40	Banana Republic	50	Marks & Spencer	60	C&A	70	H&M (H&M Group)	73				
Cato Fashions	5	Dillard's	10	Urban Outfitters	20	Big W	30	Monsoon	40	Gap	50	Patagonia	60	Adidas	69						
Claire's	5	Dr. Martens	10	Carrefour	20	John Lewis	30	Uniqlo	40	Old Navy	50	The North Face	59	Reebok	69						
Eddie Bauer	5	DSW	10	Chloé	20	Kathmandu	30	Champion	39	Lindex	50	Timberland	59	Esprit	64						
Aeropostale	4	Furla	10	Otto	20	Vero Moda	30	Hanes	39	Gildan	49	Vans	59								
Canada Goose	4	Gerry Weber	10	Superdry	20	Jack & Jones	30	Zalando	39	G-Star RAW	49	Wrangler	59								
Jockey	4	Muji	10	Tod's	20	Under Armour	29	Primark	38	Dressmann	48	Puma	57								
Justfab	4	Steve Madden	10	COACH	19	Columbia Sportswear	28	Topman	38	Gucci	48	ASOS	55								
Tory Burch	4	Triumph	10	Kate Spade	19	El Corte Inglés	28	Topshop	38	Levi Strauss & Co	48	Converse	55								
BCBGMAXAZRIA	3	Valentino	10	GUESS	19	Very	28	Target	37	New Balance	48	Jordan	55								
Billabong	3	Armani	9	Hudson's Bay	19	Walmart	28	Burberry	36	Tchibo	48	Nike	55								
Quicksilver	3	boohoo	9	Saks Fifth Avenue	19	Ermenegildo Zegna	27	Next	36	Sainsbury's-TU Clothing	47	United Colors of Benetton	55								
Roxy	3	PrettyLittleThing	9	Lands' End	19	Lidl	27	Russell Athletic	36	Balenciaga	47	Calvin Klein	54								
Dolce & Gabbana	3	Famous Footwear	9	Moncler	19	Mizuno	27	Helly Hansen	35	SAINT LAURENT	46	Tommy Hilfiger	54								
Longchamp	3	The Children's Place	9	Reserved	19	Ralph Lauren	27	OVS	35	Bottega Veneta	46	Van Heusen	54								
Nine West	3	ANTA	8	TOPVALU COLLECTION	19	LOFT	26	Asda	34	ASICS	46										
Diane Von Furstenberg	2	Beanpole	8	Woolworths South Africa	19	CELINE	26	HEMA	34	Lululemon	44										
DKNY	2	Cole Haan	8	KiK	18	Dior	26	Speedo	34	Bershka	44										
Fashion Nova	2	Express	8	Kaufland	18	Louis Vuitton	26	The Warehouse	34	Massimo Dutti	44										
KOOVS	2	Fila	8	Kmart	18	Fendi	25	Hermès	33	Pull&Bear	44										
REVOLVE	2	Michael Kors	8	Matalan	18	Marc Jacobs	25	Kmart Australia	33	Stradivarius	44										
Big Bazaar - ffb	1	Ross Dress for Less	8	Miu Miu	18	Abercrombie & Fitch	25	Target Australia	33	Zara	43										
celio	1	Skechers	8	Prada	18	Hollister Co.	25	Fjällräven	31	Bonprix	43										
Metersbonwe	1	Tommy Bahama	8	Pimkie	18	ALDI Nord	25	Mammut	31	New Look	43										
New Yorker	1	Bosideng	7	Tom Tailor	18	Amazon	25	Morrisons	31	Tesco	41										
Bally	0	Foot Locker	7	ALDO	17	Brooks Sport	25			Debenhams	41										
Belle	0	Forever 21	7	Cotton On	25	Cotton On	25			Hugo Boss											
Elie Tahari	0	New York & Company	7	Lacoste	25	Lacoste	25														
Heilan Home	0	United Arrows	7	Prisma	25	Prisma	25														
Jessica Simpson	0	Carhartt	6	Zeeman	25	Zeeman	25														
Max Mara	0	Jil Sander	6	Decathlon	23	Decathlon	23														
Mexx	0	K-Way	6	Disney	23	Disney	23														
Pepe Jeans	0	LL Bean	6	REI	23	REI	23														
Tom Ford	0	Neiman Marcus	6	Ted Baker	23	Ted Baker	23														
Youngor	0	Sports Direct	6	Mango	22	Mango	22														
		Versace	6	Monoprix	22	Monoprix	22														
				JD Sports	22	Nordstrom	22														
				Kohl's	22	River Island	22														
				MRP	21	Free people	21														
				s.Oliver	21	Ito-Yokado	21														
				Costco	21	Salvatore Ferragamo	21														
				Fanatics	21	Victoria's Secret	21														
				JCPenney	15																
				Li-Ning	15																
				TJ Maxx	15																
				Truworths	15																
				Burlington	14																
				CAROLL	14																
				Foschini	14																
				J.Crew	14																
				Calzedonia	13																
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				Tezenis	13																
				Fossil	13																
				Joe Fresh	13																
				Carolina Herrera	12																
				Chico's	12																
				Reliance Trends	12																
				Takko	12																
				Brunello Cucinelli	11																
				Chanel	11																
				Diesel	11																
				Marni	11																
				La Redoute	11																
				Merrell	11																
				Sandro	11																

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



# QUICK FINDINGS

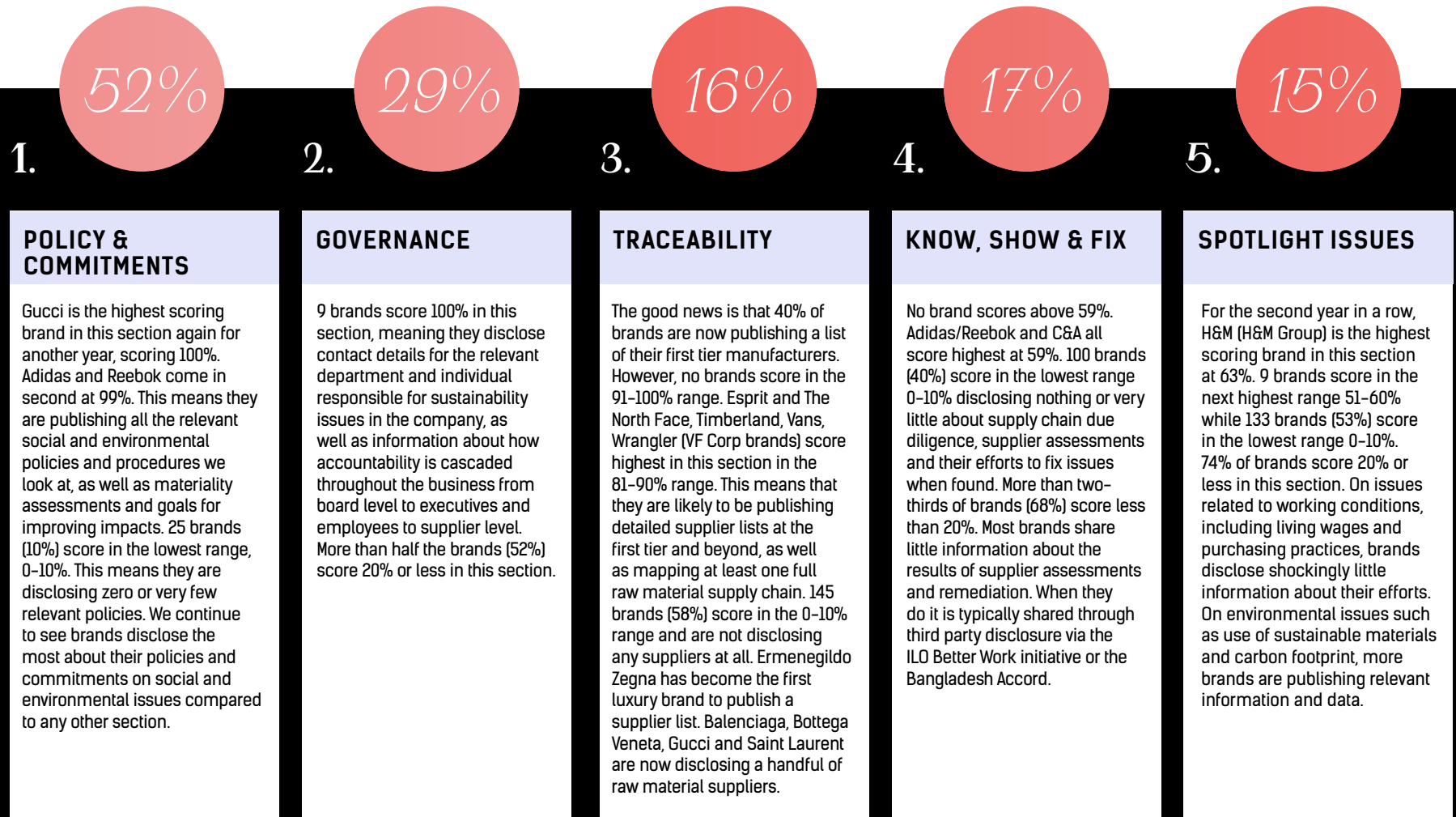


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# THE FINAL SCORES ACROSS THE 5 SECTIONS



# AVERAGE SCORES ACROSS THE SECTIONS



# 1. POLICY & COMMITMENTS

## APPROACH

### What human rights and environmental policies and procedures do major brands and retailers publicly disclose?

In this section we reviewed what policies and procedures brands disclose both at company level (as related to the company's own operations in head offices, stores, warehouses, and owned production facilities) and at supplier level (Code of Conduct or supplier guidance document).

#### We looked at the following issues:

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

### We typically found this information in the following places:

- Brand website
- Parent company or group website
- Sustainability or corporate responsibility microsite;
- Investor relations website (so long as weblink made available via their main website)
- Another external third party website (e.g. online data platform, NGO partner, data sharing initiative, another benchmarking disclosure – so long as the weblink is made available via the brand's own website)

### We do not count the following information sources:

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

### Social & environmental priorities and measurable, long-term goals

We looked to see whether brands and retailers are disclosing their key human rights and environmental priorities (typically in the form of a materiality assessment). Some issues will be more relevant and timely for each brand, and we wanted to understand how they decide upon these priorities and what these priorities are.

We also looked to see whether brands are publishing their goals or a strategic roadmap for improving social and environmental impacts across the value chain. We only counted these goals if they were time-bound, measurable and set for 2020 or later. We also awarded points if brands are reporting on annual progress towards achieving these goals.

### Verified information

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

# 1. POLICY & COMMITMENTS

## RESULTS

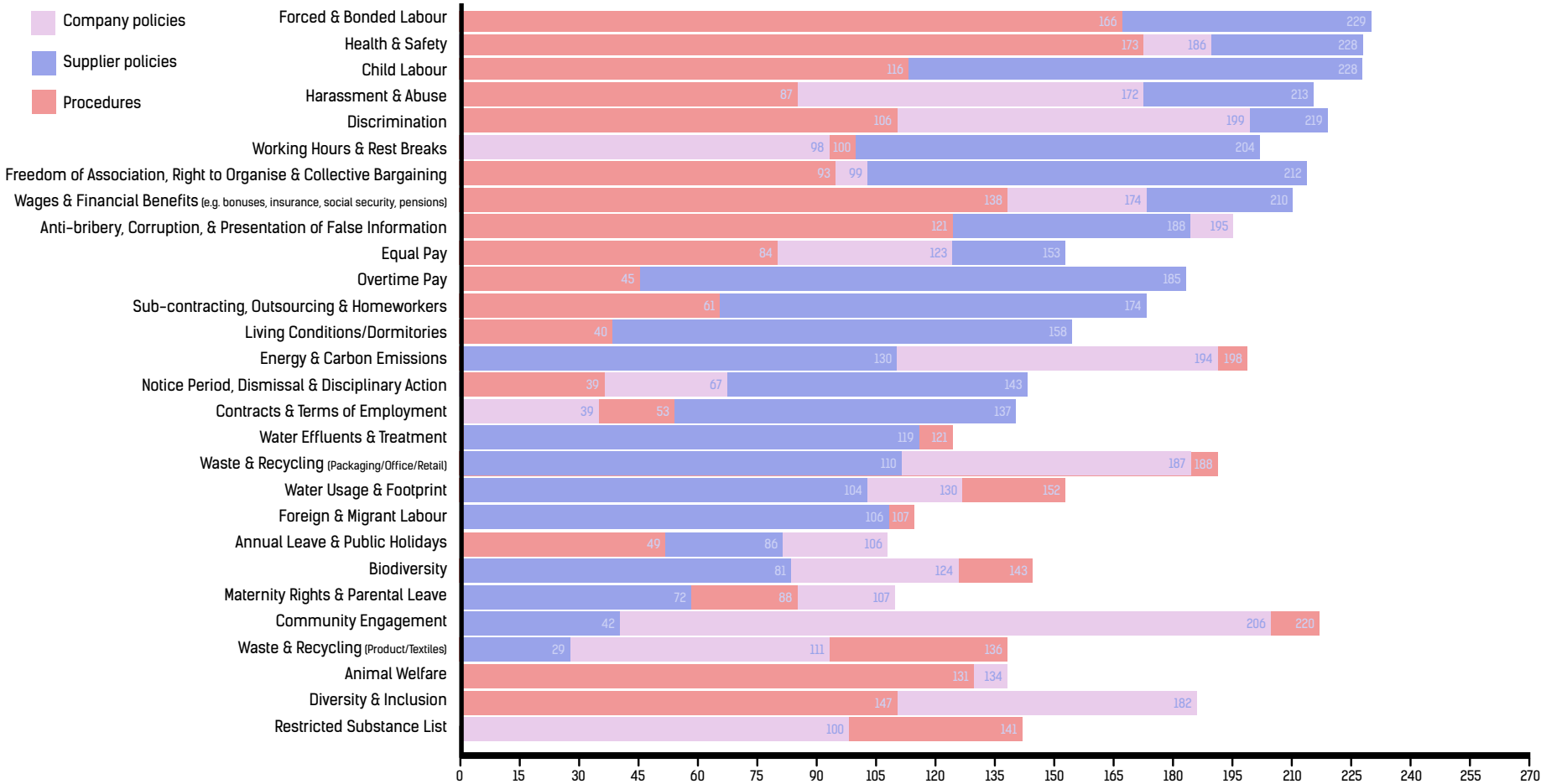
0-5%		6-10%		11-20%		21-30%		31-40%		41-50%		51-60%		61-70%		71-80%		81-90%		91-100%	
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Big Bazaar - ffb	4	Quicksilver	10	Versace	20	Forever 21	29	Steve Madden	40	MRP	50	Bloomingdale's	60	ALDI SOUTH	68	ASOS	79	Patagonia	89	Adidas	99
New Yorker	3	Roxy	10	Dolce & Gabbana	18	Dillards	28	Chico's	39	Tod's	50	Macy's	60	Clarks	68	CELINE	79	Tchibo	89	Reebok	99
Max Mara	2	Canada Goose	10	Justfab	18	Fanatics	27	Diesel	39	Burlington	49	Calzedonia	60	Jack & Jones	68	Dior	79	Timberland	89	Balenciaga	98
Pepe Jeans	2	Longchamp	10	Jockey	17	Fila	26	Marni	39	Zeeman	49	Intimissimi	60	Vero Moda	68	Fendi	79	The North Face	88	Bottega Veneta	98
Tom Ford	1	DKNY	9	Tory Burch	17	ANTA	26	Merrell	39	Cortefiel	48	Tezenis	60	Under Armour	68	Louis Vuitton	79	Vans	88	SAINT LAURENT	98
Bally	0	KOOVS	9	Jil Sander	16	boohoo	26	Sandro	39	Helly Hansen	48	COACH	60	Amazon	67	Marc Jacobs	79	Wrangler	88	C&A	97
Belle	0	celio	7	Aeropostale	15	PrettyLittleThing	26	DSW	38	Truworths	48	Kate Spade	60	El Corte Inglés	67	G-Star RAW	79	Calvin Klein	88	Puma	95
Elie Tahari	0	Diane Von Furstenberg	6	Cato Fashions	15	Express	26	Tom Tailor	38	Furla	46	LOFT	60	Kmart	67	Uniqlo	79	Tommy Hilfiger	88	Marks & Spencer	94
Heilan Home	0	Fashion Nova	6	BCBGMAXAZRIA	13	Neiman Marcus	26	Cotton On	37	Carolina Herrera	45	Brooks Sport	59	Lands' End	67	Walmart	79	Van Heusen	88	Banana Republic	91
Jessica Simpson	0	Nine West	6			Brunello Cucinelli	24	Armani	36	Fossil	45	Miu Miu	59	New Look	67	Asda	78	Hermès	88	Gap	91
Metersbonwe	0					Cole Haan	24	Buckle	36	JCPenney	45	Prada	59	Nordstrom	67	Next	78	Levi Strauss & Co	88	Old Navy	91
Mexx	0					New York & Company	24	Ermenegildo Zegna	36	Chanel	44	Russell Athletic	59	Topman	67	Ralph Lauren	78	ASICS	86	Converse	91
Youngor	0					Brooks Brothers	23	Reliance Trends	36	JD Sports	43	s.Oliver	59	Topshop	67	Monoprix	77	Bershka	86	Jordan	91
						Carhartt	23	Anthropologie	35	Falabella	41	GUESS	57	Chloé	66	New Balance	77	Massimo Dutti	86	Nike	91
						K-Way	23	Free people	35	La Redoute	41	John Lewis	57	Moncler	66	Tesco	76	Pull&Bear	86	Gildan	91
						LL Bean	23	Urban Outfitters	35	River Island	41	KiK	57	Lacoste	65	The Warehouse	76	Stradivarius	86	H&M (H&M Group)	91
						Michael Kors	23	Bosideng	35			Lidl	57	Speedo	65	Dressmann	74	Zara	86		
						Sports Direct	23	Joe Fresh	35			UGG	56	Abercrombie & Fitch	64	Lindex	74	Esprit	86		
						Beanpole	21	Pimkie	35			Very	56	Hollister Co.	64	Lululemon	74	Burberry	85		
						Claire's	21	The Children's Place	35			Woolworths South Africa	56	Carrefour	64	Big W	73	United Colors of Benetton	84		
								Valentino	35			Costco	55	Mango	64	OVS	73	Zalando	84		
								Dr. Martens	34			Debenhams	55	Mizuno	64	Primark	72	Kmart Australia	83		
								Famous Footwear	34			Desigual	55	Otto	64	Bonprix	71	Target Australia	83		
								Foschini	34			Dick's Sporting Goods	55	Sainsbury's-TU Clothing	63	Ito-Yokado	71	Monsoon	83		
								Gerry Weber	34			Prisma	55	Decathlon	61	Salvatore Ferragamo	71	Fjällräven	81		
								Muji	34			ALDO	55	Superdry	61	TOPVALU COLLECTION	71				
								Tommy Bahama	34			HEMA	54								
								Skechers	33			Hudson's Bay	54								
								Ross Dress for Less	32			Saks Fifth Avenue	54								
								Takko	32			Li-Ning	54								
								Triumph	32			REI	54								
								Kaufland	31			Reserved	54								
								United Arrows	31			American Eagle	53								
												Champion	53								
												Hanes	53								
												Aritzia	52								
												Mammut	52								
												Morrison's	52								
												Ted Baker	52								
												CAROLL	51								
												Disney	51								
												J.Crew	51								
												Kohl's	51								
												TJ Maxx	51								
												Victoria's Secret	51								

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

# 1. POLICY & COMMITMENTS

## FINDINGS

### HOW MANY BRANDS PUBLISH RELEVANT POLICIES?



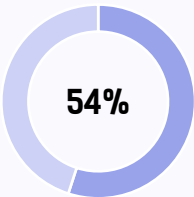


# 1. POLICY & COMMITMENTS

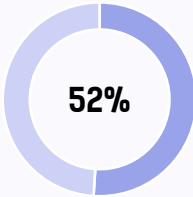
## FINDINGS

### IMPLEMENTATION OF POLICIES

#### ANIMAL WELFARE

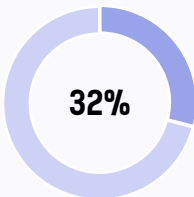


publish a company policy

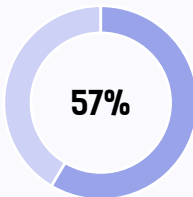


disclose how their policies are implemented

#### BIODIVERSITY & CONSERVATION

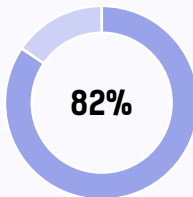


publish supplier policies

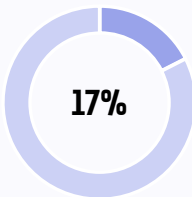


disclose procedures that address this topic

#### COMMUNITY ENGAGEMENT

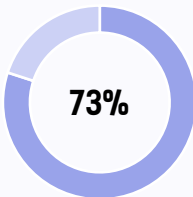


publish a company policy on this topic

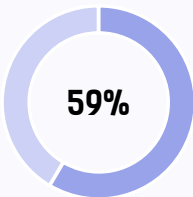


publish supplier policies

#### DIVERSITY & INCLUSION

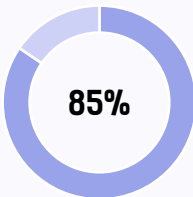


publish a company policy on this topic

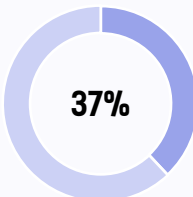


disclose how policies are implemented

#### FREEDOM OF ASSOCIATION

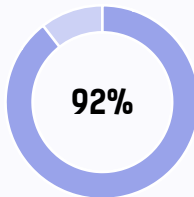


publish supplier policies

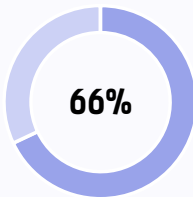


disclose how policies are implemented

#### FORCED & BONDED LABOUR



publish supplier policies

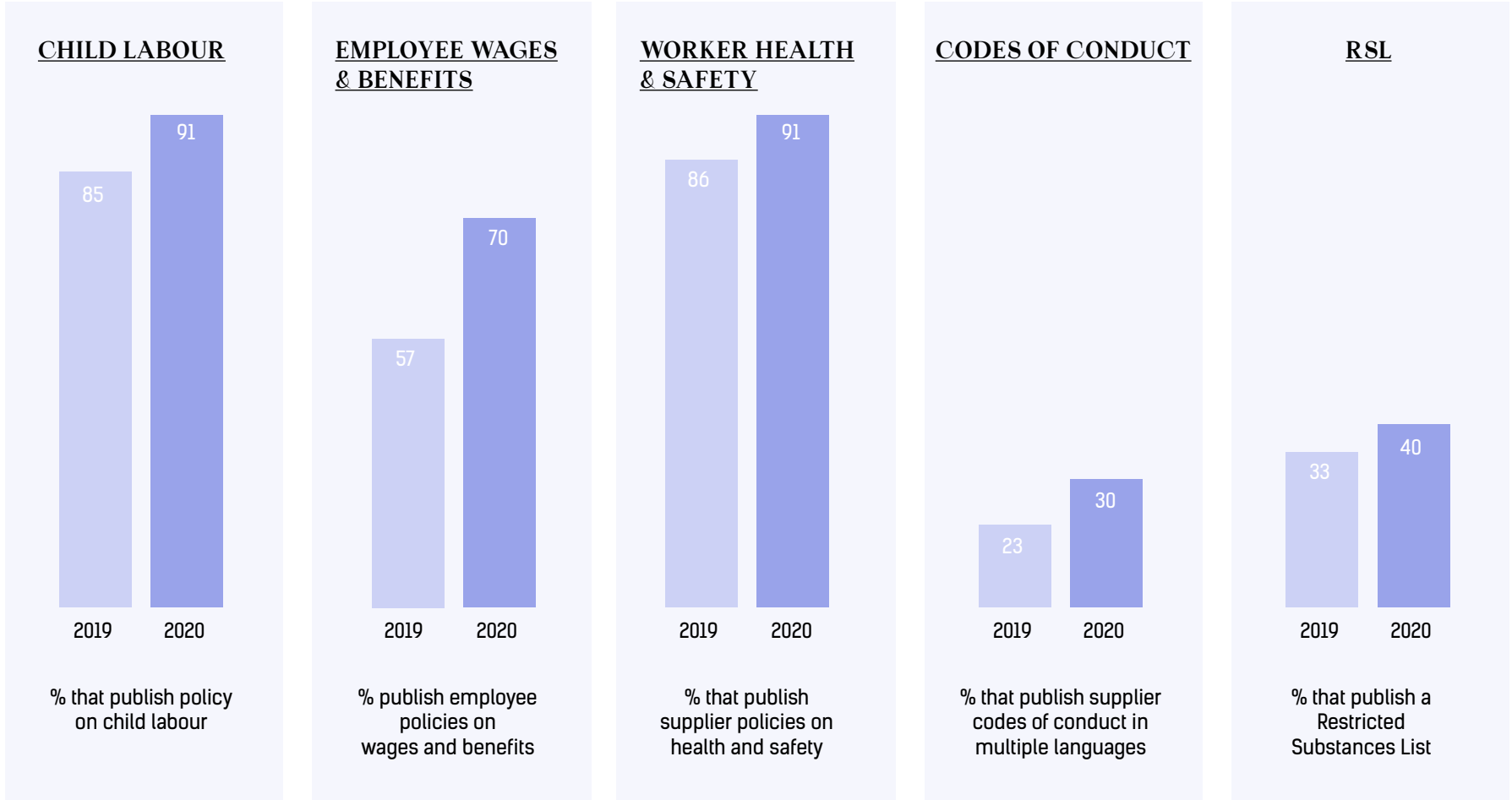


disclose how policies are implemented

# 1. POLICY & COMMITMENTS

## FINDINGS

ANNUAL PROGRESS



# 1. POLICY & COMMITMENTS ANALYSIS

For the first time, the overall average score among brands on policy and commitments is over 50%. Every year this is the area in which brands disclose the most information.

## Policy & Commitments: Overall average score year-on-year progress

2017 2018 2019 2020

49%  
of 100 brands

46%  
of 150 brands

48%  
of 200 brands

52%  
of 250 brands

## Majority of brands publish policies on egregious issues

More than three-quarters of brands publish company policies – those that apply to its own directors and employees – on topics including: anti-bribery and corruption (78%), community engagement (82%), discrimination (80%), and energy and carbon emissions (78%).

The topics in which the fewest number of brands publish company policies include: contracts and terms of employment (16%), dismissal and disciplinary action (27%), and working hours and rest breaks (39%)

Where brands have made the most year-on-year progress taking steps to publicly disclose company policies for the first time, this includes:

- Annual leave and public holidays: 42% in 2020, up from 26% in 2019 and 23% in 2017
- Anti-bribery and corruption: 78% in 2020, up from 71% in 2019 and 35% in 2017
- Maternity rights and parental leave: 43% in 2020, up from 31% in 2019 and 30% in 2017
- Dismissal and disciplinary action: 27% in 2020, up from 17% in 2019 and 13% in 2017
- Waste and recycling (office and packaging): 75% in 2020, up from 72% in 2019 and 37% in 2017

Since publishing the Index, several brands have taken steps to publicly disclose some of their internal company policies for the first time. This is not something that has had as much external scrutiny as supply chain disclosure. Relevant information is often found in an Employee Handbook, Company Code of Conduct, separate environmental management policies or sometimes in the careers section of a brand's website, depending on the topic.

More than three-quarters of brands publish supplier policies – those that apply to its supplier partners and workers in the supply chain – on topics including: child labour (91%), discrimination (88%), forced and bonded labour (92%), freedom of association and unionisation (85%), harassment and violence (85%), health and safety (91%), wages and benefits (84%), and working hours and rest breaks (82%).

Less than one-third of brands publish supplier policies on the following topics: biodiversity and conservation (32%), community engagement (17%), maternity rights and parental leave (29%), and textile waste and recycling (12%).

The issues that receive the most public scrutiny and pressure are those most likely to be reflected in the policies that major brands have taken steps to disclose. Such topics include forced and bonded labour (92%), child labour (91%) and factory health and safety (91%).

Where brands have made the most year-on-year progress taking steps to publicly disclose supplier policies for the first time, this includes:

- Anti-bribery and corruption: 75% in 2020, up from 68% in 2019 and 61% in 2017
- Dismissal and disciplinary action: 57% in 2020, up from 48% in 2019 and 26% in 2017
- Equal pay: 61% in 2020, down from 68% in 2019 but up from 49% in 2017
- Foreign and migrant labour: 42% in 2020; up from 36% in 2019 and 32% in 2017
- Living conditions and dormitories: 63% in 2020, up from 52% in 2019 and 51% in 2017

29% of brands are now having the sustainability information published in annual reports verified by third party firms, an increase from 26% of brands in 2019. This assurance is typically carried out by large accounting firms such as Deloitte, Ernst & Young or PwC.

### **Less than a third of brands disclose Supplier Codes of Conduct in local languages**

Most supplier policies are set out in what is referred to as the brands' Supplier Code of Conduct (CoC). For the most part, brands publish their CoCs in English. However, most suppliers and workers are based in non-English speaking countries, so we also look for brands to be publishing their Codes of Conduct in the local languages of their most prominent sourcing countries so that workers can access and understand the standards that apply to them. We found that only 30% of brands publish translations of their CoC. However, on a more positive note, this is an increase from 23% of brands in 2019.

### **Brands continue to publish more about their policies than how they implement them**

As in all previous editions of the Index, major brands tend to disclose more about their policies than they do about how they put those policies into action and the results of their efforts to address social and environmental issues.

For example, 91% of brands publish a supplier policy on child labour, but only 46% disclose information about how this policy is implemented through a specific focused procedure or activity.

Meanwhile, 73% of brands publish a company policy on diversity and inclusion, but only 59% disclose how this policy is implemented.

At least three-quarters of brands explain how company and/or supplier policies are implemented through specific focused activities or procedures on the following topics: community engagement (88%), energy and carbon emissions (79%), and office and packaging waste and recycling (75%).

On the other hand, less than one-fifth of brands explain how company and/or supplier policies are implemented through specific focused activities or procedures on the following topics: annual leave and public holidays (20%), supplier living conditions and dormitories (16%), and dismissal and disciplinary action (16%).

Brands are taking some steps to publicly disclose information about how they're implementing company and supplier policies, but we hope to see more progress next year covering a broader range of issues. This year, the topics which saw the most year-on-year progress were:

- Animal welfare: 52% in 2020, up from 47% in 2019 and 34% in 2017
- Forced and bonded labour: 66% in 2020, up from 62% in 2019 and 52% in 2017
- Foreign and migrant labour: 43% in 2020, up from 32% in 2019 and 30% in 2017

### **Far more brands continue to disclose goals towards improving environmental impacts than human rights**

57% of brands publish time-bound, measurable goals or targets focused on improving their environmental impacts, and 52% report annual progress towards achieving these goals. On the other hand, only 38% of brands publish time-bound, measurable goals or targets focused on improving their human rights impacts, and 36% report annual progress towards achieving these goals. We would also like to highlight the fact that many of the time-bound goals that brands are disclosing end in 2020, and we will be interested to see how brands will update and make more ambitious and comprehensive goals going forward.

For another year in a row, less than half of brands (42%) publish a materiality assessment, which is a process a company undertakes to speak to different stakeholders to determine its most significant human rights and environmental impacts. This information is useful because it helps us understand how brands decide what the biggest priorities are in their business.

## 2. GOVERNANCE *APPROACH*

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

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

First, we looked to see if brands publish direct contact details for a relevant department, such as the sustainability or corporate responsibility team. Then, we looked to see if they share the direct contact details for the individual(s) with lead responsibility for social and environmental impacts. This enables the public to get in touch with questions and queries.

We also looked for the name of a board member who is responsible for social and environmental issues and how this oversight is implemented.

### **Employee, executive and supplier incentives for improving performance**

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

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

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

**"Fashion is at a crossroads where one direction leads to a rapid scale-up of implementation that'll turn it into a real climate leader. The other direction leads to more commitments, but without real implementation."**

**Liz McDowell,**  
Director, Standearth

# 2. GOVERNANCE

## RESULTS

0-5%		6-10%		11-20%		21-30%		31-40%		41-50%		51-60%		61-70%		71-80%		81-90%		91-100%	
Aeropostale	0	Big Bazaar – ffb	8	ALDI SOUTH	17	American Eagle	25	Abercrombie & Fitch	33	Banana Republic	50	G-Star RAW	58	Asda	67	Fjällräven	75	Dressmann	83	Adidas	100
Anthropologie	0	Bloomingdale's	8	ALDO	17	Aritzia	25	Hollister Co.	33	Gap	50	Prisma	58	Walmart	67			Hugo Boss	83	Reebok	100
Free people	0	Macy's	8	Amazon	17	Big W	25	ALDI Nord	33	Old Navy	50	Zalando	58	Bershka	67			Marks & Spencer	83	Balenciaga	100
Urban Outfitters	0	boohoo	8	ANTA	17	HEMA	25	ASICS	33	Burberry	50			Massimo Dutti	67			Puma	83	Bottega Veneta	100
Bally	0	PrettyLittleThing	8	Armani	17	REI	25	ASOS	33	Calvin Klein	50			Pull&Bear	67			Sainsbury's-TU Clothing	83	Gucci	100
BCBGMAXAZRIA	0	CAROLL	8	Bosideng	17	Ted Baker	25	Beanpole	33	Tommy Hilfiger	50			Stradivarius	67					SAINT LAURENT	100
Belle	0	Cotton On	8	Brooks Sport	17	The Warehouse	25	Brunello Cucinelli	33	Van Heusen	50			Zara	67					C&A	100
Billabong	0	Fila	8	Buckle	17	Tom Tailor	25	Chico's	33	Champion	50			Bonprix	67					H&M (H&M Group)	100
Quicksilver	0	Merrell	8	Burlington	17			Chloé	33	Hanes	50			Otto	67					Tchibo	100
Roxy	0	Muji	8	Calzedonia	17			Clarks	33	Converse	50			CELINE	67						
Brooks Brothers	0	Sandro	8	Intimissimi	17			Columbia Sportswear	33	Jordan	50			Dior	67						
Canada Goose	0	Versace	8	Tezenis	17			Dick's Sporting Goods	33	Nike	50			Fendi	67						
Cato Fashions	0			Carhartt	17			Dillards	33	Foschini	50			Louis Vuitton	67						
celio	0			Carolina Herrera	17			El Corte Inglés	33	Gildan	50			Marc Jacobs	67						
Chanel	0			Carrefour	17			Gerry Weber	33	JCPenney	50			Esprit	67						
Claire's	0			COACH	17			GUESS	33	KiK	50			New Balance	67						
Costco	0			Kate Spade	17			Helly Hansen	33	Lands' End	50			New Look	67						
Debenhams	0			Cole Haan	17			Jack & Jones	33	Levi Strauss & Co	50										
Desigual	0			Cortefiel	17			Vero Moda	33	Lindex	50										
DKNY	0			Decathlon	17			JD Sports	33	Lululemon	50										
Dolce & Gabbana	0			Diane Von Furstenberg	17			Kathmandu	33	Patagonia	50										
Eddie Bauer	0			Diesel	17			Kmart	33	Ralph Lauren	50										
Elie Tahari	0			Marni	17			Miu Miu	33	Speedo	50										
Ermenegildo Zegna	0			Disney	17			Prada	33	Tesco	50										
Fanatics	0			Dr. Martens	17			Mizuno	33	The North Face	50										
Fashion Nova	0			DSW	17			Moncler	33	Timberland	50										
Forever 21	0			Express	17			Monoprix	33	Vans	50										
Fossil	0			Famous Footwear	17			Morrisons	33	Wrangler	50										
Furla	0			Foot Locker	17			OVS	33	United Colors of Benetton	50										
Heilan Home	0			Hermès	17			Reliance Trends	33	Falabella	42										
Jessica Simpson	0			Hudson's Bay	17			Russell Athletic	33	Kohl's	42										
Jil Sander	0			Saks Fifth Avenue	17			s.Oliver	33	LOFT	42										
Jockey	0			Ito-Yokado	17			Salvatore Ferragamo	33	Monsoon	42										
Justfab	0			J.Crew	17			Target	33	Next	42										
KOOVS	0			Joe Fresh	17			TJ Maxx	33	Reserved	42										
Lacoste	0			John Lewis	17			Tod's	33												
LL Bean	0			Kaufland	17			Topman	33												
Matalan	0			Kmart Australia	17			Topshop	33												
Max Mara	0			Target Australia	17			UGG	33												
Mexx	0			K-Way	17			Very	33												
New York & Company	0			La Redoute	17			Woolworths South Africa	33												
New Yorker	0			Lidl	17																
Pepe Jeans	0			Li-Ning	17																
REVOLVE	0			Longchamp	17																
Ross Dress for Less	0			Mammut	17																
Skechers	0			Mango	17																
Sports Direct	0			Metersbonwe	17																
The Children's Place	0			Michael Kors	17																
Tom Ford	0			MRP	17																
Tommy Bahama	0			Neiman Marcus	17																
Tory Burch	0			Nine West	17																
Triumph	0			Nordstrom	17																
United Arrows	0			Pimkie	17																
Youngor	0			Primark	17																
				River Island	17																
				Steve Madden	17																
				Superdry	17																
				Takko	17																
				TOPVALU COLLECTION	17																
				Truworths	17																
				Under Armour	17																
				Uniqlo	17																
				Valentino	17																
				Victoria's Secret	17																
				Zeeman	17																

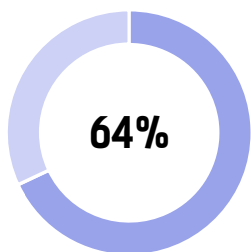
\* Brands ranked in numerical order by score out of 250, but shown as rounded-up percentage. Where brands have the same percentage score, they are listed in alphabetical order and grouped with others from same parent company



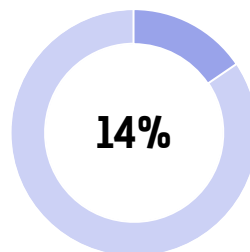
## 2. GOVERNANCE

### FINDINGS

#### HOW EASILY CAN YOU CONTACT A BRAND?

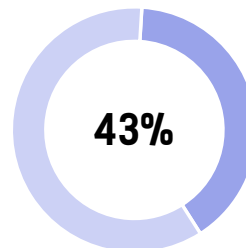


publish direct contact details of the sustainability or corporate responsibility team

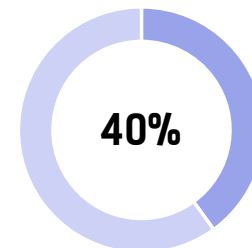


disclose the direct contact details of the person with lead responsibility for human rights and environmental impacts in the business

#### BOARD LEVEL ACCOUNTABILITY

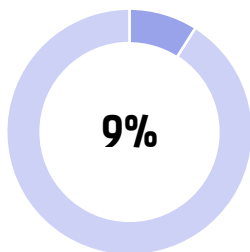


disclose who on the board holds responsibility for the company's human rights and environmental impacts

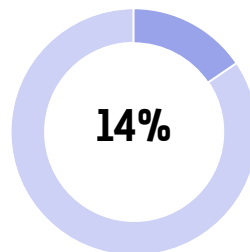


publish a description of how board level accountability is implemented

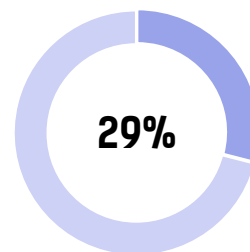
#### ARE INCENTIVES TIED TO SOCIAL AND ENVIRONMENTAL PROGRESS?



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



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



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

## 2. GOVERNANCE ANALYSIS

### Enabling customers and stakeholders to get in touch

One simple act of transparency brands can take is to provide a way to directly contact the corporate responsibility or sustainability team. This allows an open line of communication between the brand and its customers and stakeholders who would like to ask questions or raise concerns. This is why we look for brands to share a direct email address or phone number for a relevant department.

We found that 64% of brands are now publishing an email address for their CSR/sustainability department, up from 60% of brands last year. However, only 14% of brands disclose the direct contact details for the specific person in the company in charge of human rights and environmental issues in the company. In next year's report, we hope to see these numbers increase significantly, especially for CSR/sustainability department contact details.

### Board level accountability for human rights and environmental impacts

Many CEOs are coming to view sustainability issues as critical to the future of their business. A recent study of 1,000 global executives conducted by Accenture and UN Global Compact (2019) shows that the business community can and should be making a far greater contribution to achieving the 2030 Sustainable Development Goals. Interestingly, 88% of CEOs "believe our global economic systems need to refocus on equitable growth."

On this topic, we found that fewer than half of brands (43%) disclose the name of the board member, if there is one, who is responsible for human rights and environmental issues in the company, and 40% disclose how this board level accountability is implemented in practice.

### Executive, employee and supplier incentives connected to making progress

We looked to see how major brands are incentivising their own employees, company executives and suppliers to improve human rights impacts and environmental performance. By incentives for employees and executives, we mean whether their job performance reviews, pay and bonuses are tied to improvements in these areas. We found that only 9% of brands publish information about how employees (e.g. those working in designing, sourcing, buying, merchandising, production) incentives are tied to improvements in human rights impacts and environmental performance. Meanwhile, only 14% of brands disclose that executives' (e.g. CEO, CFO, president) pay or bonuses are tied to these improvements, an increase from 10% in 2019.

However, more brands (29%) disclose supplier incentives for improvements on human rights impacts and environmental performance. This can include long-term commitments to purchase from suppliers, increased order sizes, price premiums on orders or fewer audits.

It is quite telling that brands disclose all sorts of policies and expectations of good business practice for their suppliers, but when it comes to tying that to executive and employee performance, then little information is published. It begs the question: why do brands seem more willing to put performance-related incentives and accountability in place for their suppliers than their own employees and executives?

# 3. TRACEABILITY

## APPROACH

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

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

### Are brands sharing information such as:

- The address of the facility
- The types of products/services made in each supplier facility
- Approximate number of workers
- Sex-disaggregated breakdown of workers at each site
- If the facility has a trade union
- If the facility has an independent worker committee
- % of migrant or contract workers
- Name of parent company
- The business relationship between facilities at different levels of their supply chain
- If the list is available as a csv or Excel spreadsheet
- If the list was updated within the past 6 months

### Disclosing factories, processing facilities and raw material suppliers

We looked for supplier lists at three levels:

First, are brands disclosing the factories where their clothes are made – e.g. the facilities with which brands have a direct relationship and typically do the cutting, sewing and final trims of products?

Second, are brands disclosing processing facilities further down the supply chain – e.g. from ginning and spinning, through to subcontractors, wet processing, embroidering, printing, finishing, dye-houses, laundries, and so on?

And finally, are brands disclosing their suppliers of raw materials – e.g. primary materials such as fibres, hides, rubber, dyes, metals and so on?

We also checked if brands disclose information about tracing at least one raw material supply chain such as leather, cotton, down or wool.

**"Transparency and traceability are enablers of change"**

Leslie Johnston,  
Chief Executive Officer at Laudes Foundation

# 3. TRACEABILITY RESULTS

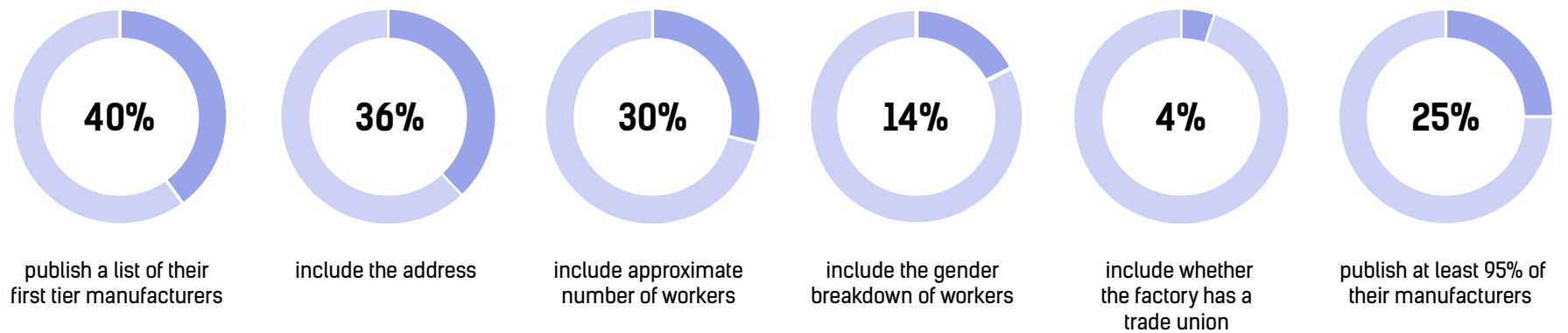
0%		1-5%		6-10%		11-20%		21-30%		31-40%		41-50%		51-60%		61-70%		71-80%		81-90%		91-100%	
Aeropostale	0	ALDO	1	Tod's	10	ALDI SOUTH	17	Morrisons	30	Topman	39	Bonprix	49	Clarks	59	C&A	70	H&M (H&M Group)	77	Esprit	82		
ANTA	0	American Eagle	1	Fjällräven	8	ALDO	17	Speedo	30	Topshop	39	Russell Athletic	49	Converse	59	ASOS	66	United Colors of Benetton	73	The North Face	81		
Armani	0	Aritzia	1	Prisma	8	Amazon	17	Target	29	Levi Strauss & Co	38	ASICS	48	Jordan	59	Adidas	62			Timberland	81		
Bally	0	Bloomingdale's	1	Abercrombie & Fitch	6	ANTA	17	Zalando	29	The Warehouse	35	Monsoon	48	Nike	59	Reebok	62			Vans	81		
BCBGMAXAZRIA	0	Macy's	1	Hollister Co.	6	Armani	17	Ted Baker	28	Anthropologie	33	Helly Hansen	47	G-Star RAW	59	Patagonia	61			Wrangler	81		
Beanpole	0	Burberry	1	Joe Fresh	6	Bosideng	17	Cotton On	27	Free people	33	HEMA	47	Lindex	59								
Belle	0	Canada Goose	1			Brooks Sport	17	Fanatics	27	Urban Outfitters	33	Puma	47	Debenhams	57								
Big Bazaar – ffb	0	Carrefour	1			Buckle	17	Hermès	27	John Lewis	32	Banana Republic	46	Ermenegildo Zegna	57								
Billabong	0	CELINE	1			Burlington	17	Mammut	27			Gap	46	Lululemon	57								
Quicksilver	0	Dior	1			Calzedonia	17	River Island	27			Old Navy	46	Sainsbury's-TU Clothing	54								
Roxy	0	Fendi	1			Intimissimi	17	Under Armour	27			New Balance	46	Dressmann	53								
boohoo	0	Louis Vuitton	1			Tezenis	17	ALDI SOUTH	25			New Look	43	Marks & Spencer	52								
PrettyLittleThing	0	Marc Jacobs	1			Carhartt	17	Columbia Sportswear	25			Tchibo	42	Calvin Klein	52								
Bosideng	0	Chloé	1			Carolina Herrera	17	Jack & Jones	25			Tesco	42	Tommy Hilfiger	52								
Brooks Brothers	0	COACH	1			Carrefour	17	Vero Moda	25					Van Heusen	52								
Brunello Cucinelli	0	Kate Spade	1			COACH	17	Kathmandu	25					Gildan	51								
Buckle	0	Cole Haan	1			Kate Spade	17	Next	25					Champion	51								
Burlington	0	Cortefiel	1			Cole Haan	17	Very	25					Hanes									
Calzedonia	0	Costco	1			Cortefiel	17	Hugo Boss	24														
Intimissimi	0	Dr. Martens	1			Decathlon	17	Pimkie	24														
Tezenis	0	Famous Footwear	1			Diane Von Furstenberg	17	Zeeman	24														
Carhartt	0	Fossil	1			Diesel	17	Lacoste	23														
Carolina Herrera	0	Gerry Weber	1			Marni	17	Mizuno	23														
CAROLL	0	Ito-Yokado	1			Disney	17	OVS	23														
Cato Fashions	0	J.Crew	1			Dr. Martens	17	Primark	23														
celio	0	KIK	1			DSW	17	Kaufland	22														
Chanel	0	Lands' End	1			Express	17	Uniqlo	22														
Chico's	0	LL Bean	1			Famous Footwear	17																
Claire's	0	Merrell	1			Foot Locker	17																
Decathlon	0	Miu Miu	1			Hermès	17																
Desigual	0	Prada	1			Hudson's Bay	17																
Diane Von Furstenberg	0	Moncler	1			Saks Fifth Avenue	17																
Dick's Sporting Goods	0	MRP	1			Ito-Yokado	17																
Diesel	0	Nordstrom	1			J.Crew	17																
Marni	0	Otto	1			Joe Fresh	17																
Dillards	0	Ralph Lauren	1			John Lewis	17																
DKNY	0	Reserved	1			Kaufland	17																
Dolce & Gabbana	0	s.Oliver	1			Kmart Australia	17																
DSW	0	Salvatore Ferragamo	1			Target Australia	17																
Eddie Bauer	0	Superdry	1			K-Way	17																
Elie Tahari	0	Takko	1			La Redoute	17																
Express	0	UGG	1			Lidl	17																
Falabella	0	Walmart	1			Li-Ning	17																
Fashion Nova	0	Woolworths South Africa	1			Longchamp	17																
Fila	0					Mammut	17																
Foot Locker	0					Mango	17																
Forever 21	0					Metersbonwe	17																
Foschini	0					Michael Kors	17																
Furla	0					MRP	17																
GUESS	0					Neiman Marcus	17																
Heilan Home	0					Nine West	17																
JCPenney	0					Nordstrom	17																
JD Sports	0					Pimkie	17																
Jessica Simpson	0					Primark	17																
Jil Sander	0					River Island	17																
Jockey	0					Steve Madden	17																
Justfab	0					Superdry	17																
Kmart	0					Takko	17																
Kohl's	0					TOPVALU COLLECTION	17																
KOOVS	0					Truworths	17																
K-Way	0					Under Armour	17																
La Redoute	0					Uniqlo	17																
Li-Ning	0					Valentino	17																
Longchamp	0					Victoria's Secret	17																
Mango	0					Zeeman	17																
Max Mara	0																						
Metersbonwe	0																						
Mexx	0																						
Michael Kors	0																						
Monoprix	0																						
Muji	0																						
Neiman Marcus	0																						
New York & Company	0																						
New Yorker	0																						
Nine West	0																						
Pepe Jeans	0																						
Reliance Trends	0																						
REVOLVE	0																						
Ross Dress for Less	0																						
Sandro	0																						
Skechers	0																						
Sports Direct	0																						
Steve Madden	0																						
The Children's Place	0																						
TJ Maxx	0																						
Tom Ford	0																						
Tommy Bahama	0																						
TOPVALU COLLECTION	0																						
Tory Burch	0																						
Triumph	0																						
Truworths	0																						
United Arrows	0																						
Valentino	0																						
Versace	0																						
Youngor	0																						

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

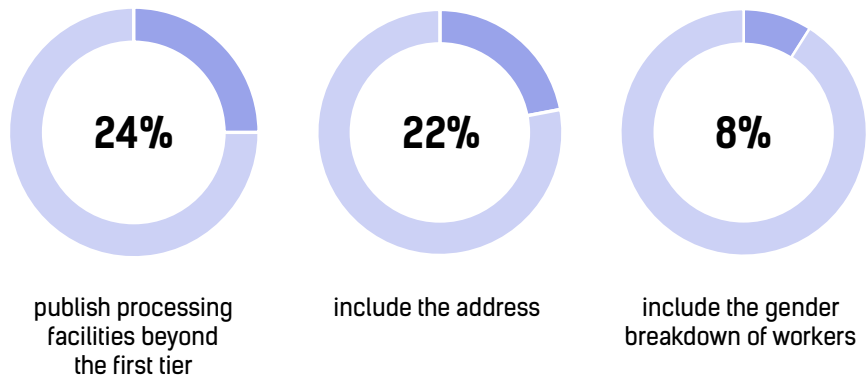
# 3. TRACEABILITY

## FINDINGS

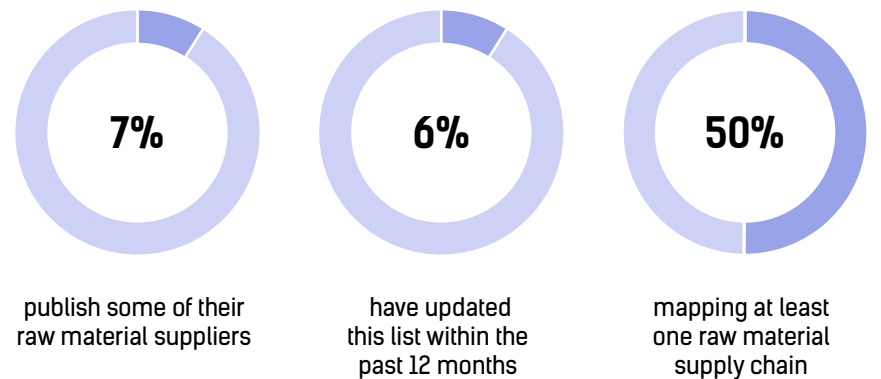
### DISCLOSING FIRST TIER MANUFACTURER DETAILS



### PROCESSING FACILITIES



### RAW MATERIAL SUPPLIERS



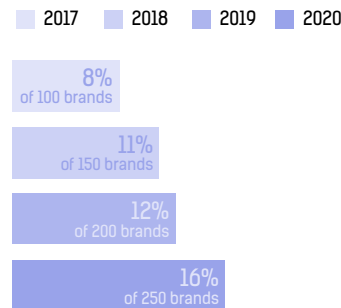
# 3. TRACEABILITY ANALYSIS

As Jenny Holdcroft, the Assistant General Secretary of IndustriALL Global Union, explained in previous editions of this report:

**“Knowing the names of major buyers from factories gives workers and their unions a stronger leverage, crucial for a timely solution when resolving conflicts, whether it be refusal to recognise the union, or unlawful sackings for demanding their rights. It also provides the possibility to create a link from the worker back to the customer and possibly media to bring attention to their issues.”**

Publicly disclosed supplier lists are helping trade unions and workers rights organisations to address and fix problems which workers are facing in the factories that supply major brands and retailers (see the case studies on page 39 and 40 for examples.)

## Traceability: Overall average score year-on-year progress



Publishing supplier lists can also benefit brands themselves. With this information publicly available, unions and civil society groups can help clarify when unauthorised subcontracting occurs in a brand's supply chain. It can also enhance investor and consumer trust in the brand, showing stakeholders that brands are willing to be open and honest about where their products are being made.

## Disclosing first tier manufacturers

First tier manufacturers are the suppliers that do the cutting, sewing and finishing of garments in the final stage of production. This year, we found that 40% of brands (101 out of 250) are publishing their first tier manufacturers (up from 35% in 2019.) 36% include the factory address. 29% include the types of products or services provided, 30% include approximate number of workers in the facility. 14% include the ratio of women to men workers, up from 9% last year. 4% include both whether the factory has an independent union and/or independent worker committee in place. 4% also include the number of migrant or contract workers.

To align with the Transparency Pledge and Open Apparel Registry requirements, we looked at what additional details brands include for each facility in their supplier lists. We found that 18% include the name of the parent company for each factory if there is one, and 15% publish this list as a CSV or Excel spreadsheet in order to make this information easy to use

for trade unions and NGOs. Only 28% of brands disclose what percentage of their manufacturers are published in this list, and 25% report that 95% or more of their manufacturers are disclosed. Finally, 32% of brands disclose that this list of manufacturers has been published or updated within the past six months.

In other exciting news, Ermenegildo Zegna has become the first luxury brand to publish a detailed supplier list. However, Hermès has disclosed some of its manufacturers and suppliers for many years. Also, Balenciaga, Bottega Veneta, Gucci and Saint Laurent have started disclosing a handful of raw material suppliers for the first time this year. We welcome and encourage this development and hope that other luxury brands will follow their lead soon.

Furthermore, 14 brands that were reviewed in last year's report have since disclosed their first tier manufacturers for the first time, including: Amazon, Anthropologie/Urban Outfitters, El Corte Inglés, Fanatics, Lacoste, Monsoon, OVS, River Island, Ted Baker, Tod's, Tom Tailor, Victoria's Secret and Zalando.



## Disclosing processing facilities

These are the sorts of facilities that may do ginning and spinning yarn, knitting and weaving fabrics, dyeing and wet processing, leather tanneries, embroidering and embellishing, fabric finishing, dyeing and printing and laundering. We found that 24% of brands (60 out of 250) are publishing some of their processing facilities (up from 19% in 2019).

22% include the facility address. 20% include the types of products or services provided, 16% include the approximate number of workers in the facility. 8% include the ratio of women to men workers, up from 4% last year. 1% of brands include both whether the facility has an independent union and/or independent worker committee in place. 2% also include the number of migrant or contract workers.



12% of brands include the name of the parent company for each facility if there is one, and 10% publish this list as a CSV or Excel spreadsheet in order to make this information easy to use for trade unions and NGOs. Only 10% of brands disclose what percentage of their processing facilities are published in this list, and 8% report that 95% or more of their processing facilities are disclosed. 20% of brands disclose that this list of processing facilities has been published or updated within the past six months.

And finally, a new indicator this year, we looked to see if brands disclose which manufacturer(s) each processing facility works with, and only 3% of brands currently disclose this data. This piece of data is important because it establishes the relationship between different tiers of the supply chain and enables suppliers, unions and workers' rights organisations to better leverage the right decision makers to get issues solved.

The good news is that 15 brands that were reviewed in last year's report have since disclosed some of their processing facilities for the first time, including: Anthropologie/Urban Outfitters, Asics, Calvin Klein/Tommy Hilfiger/Van Heusen, Clarks, Debenhams, Dressman, Ermenegildo Zegna, Lululemon, Monsoon, New Look, Sainsbury's-TU Clothing and Topshop.

[LEFT] PHOTOGRAPHY ©NÄZ  
naz.pt/

## Publishing raw material suppliers

These suppliers are those that provide brands and their manufacturers further down the chain with raw materials such as fibres, hides, rubber, dyes, metals and so on. We found that 7% of brands (18 out of 250) are publishing some of their raw material suppliers (up from 5% in 2019). This is usually only a handful of their viscose, recycled polyester, wool or cotton suppliers.

6% of brands have published or updated this list of raw material suppliers in the past 12 months. 4% include the supplier address. 6% include the types of raw materials provided. 3% include the approximate number of workers. 2% include the ratio of women to men workers. Less than 1% of brands include the number of migrant or contract workers. And, less than 1% of brands publish this list as a CSV or Excel spreadsheet in order to make this information easy to use for trade unions and NGOs.

In slightly more positive news, half of the brands reviewed disclose evidence of tracing the supply chain for at least one specific raw material. This is typically cotton, viscose, wool, recycled polyester, leather or rubber. The tools they might be using to do this traceability work include certification systems (e.g. Responsible Down/Wool Standard, Global Recycling Standard, Content Claim Standard,

Organic Cotton Standard, GOTS, FAIRTRADE Certified Cotton Mark and Cotton Programme, Cotton Made in Africa HIP, Oeko-Tex SteP/Made in Green, Leather Working Group) or blockchain, transaction certifications, DNA schemes and other similar technologies.

In other good news, 7 brands that were reviewed in last year's report have since disclosed some of their raw materials suppliers for the first time, including: Bottega Veneta/Gucci/Saint Laurent, Ermenegildo Zegna, H&M (H&M Group), Tesco and United Colors of Benetton.

Next year, we hope to see 50% (or more) of brands publishing a supplier list and more brands disclosing their processing facilities, mills, tanneries and raw material suppliers further down the tiers of the supply chain. We know that exploitation tends to thrive in hidden places, which is why focusing on transparency beyond the first tier will become increasingly important.

# CASE STUDIES:

## *Transparency in action*



[LEFT] Garment Worker in Lesotho ©ALAFa

[RIGHT] 2019, Bangladeshi garment workers shout slogans during a protest in Savar, on the outskirts of Dhaka, Bangladesh, © 2019 AP

### Worker Rights Consortium

#### LESOTHO

In 2019, at three factories in Lesotho, all owned by the same supplier, Worker Rights Consortium (WRC) found that female garment workers were regularly being coerced into sexual activity with supervisors as a condition of gaining or retaining employment or promotions. Nearly two-thirds of the garment workers WRC interviewed reported having experienced sexual harassment and abuse or having knowledge of harassment or abuse suffered by co-workers. WRC discovered that VF Corporation and Levi Strauss & Co. were both sourcing from these factories due to the fact that they publish supplier

lists on their websites. WRC facilitated discussions between local unions, NGOs and the two companies, which resulted in a ground-breaking legally-binding agreement to solve this serious problem.

As part of the agreement, an independent investigative organisation has been established to receive complaints from workers, carry out investigations and assessments, identify violations of a jointly developed code of conduct, and direct and enforce remedies in accordance with local law.



### International Labor Rights Forum

#### BANGLADESH

In December 2018, the Government of Bangladesh increased the minimum monthly wage for garment workers to 8,000 Tk (\$95 USD). The new minimum wage was half the amount that the workers' rights organisations and trade unions had demanded. Workers said the minimum wage was not enough to cover increased living costs, so they took to the streets for largely peaceful strikes. Over the following two months, 65 workers were arrested while hundreds more faced unsubstantiated charges at the behest of factory owners.

Around 11,600 workers were unlawfully dismissed, most of who were unable to find other jobs due to systematic blacklisting. Through publicly disclosed supplier lists, the International Labor Rights Forum identified which major apparel brands were linked to factories that filed unsubstantiated cases against workers. As a result of their campaign efforts, the charges filed by 14 factories were dropped.

# CASE STUDIES:

## *Transparency in action*



### Garment Worker Diaries, Microfinance Opportunities

#### **BANGLADESH**

According to cutting-edge research from our partner project the Garment Worker Diaries (2019), Bangladeshi workers in factories that are part of brands' public supplier lists earn more money per month than workers in factories that are not disclosed publicly by brands. These workers earn Tk. 5 per hour more and this translates into Tk. 1,040 in extra pay per month for 208 hours of work compared to workers in undisclosed factories – this is equivalent to about one third of their typical cost of monthly rent.



[LEFT] 2019, Bangladeshi garment workers fill out their worker diaries as part of the Garment Worker Diary project, ©Microfinance Opportunities

[RIGHT] Garment Workers in Malaysian factory, @giz.de

### Transparentem

#### **MALAYSIA**

In Malaysia, Transparentem's multi-year investigation identified endemic labour rights abuses of migrant workers in five factories. In those factories, migrant workers were deceptively recruited, paid exorbitant recruitment fees, and had their passports confiscated, thereby restricting their freedom of movement. Transparentem connected these factories to 23 global brands and retailers using publicly available supply chain data and other sources of evidence. Within two years,

Transparentem's investigation and collaborative brand engagement model led to the return of 1,600 worker passports and commitments to pay back USD \$1.75 million in worker-borne recruitment fees. In October 2018, a new industry protocol called the American Apparel and Footwear Association (AAFA)/Fair Labor Association (FLA) Apparel & Footwear Industry Commitment to Responsible Recruitment was established. To date, this protocol has been signed by 139 brands, potentially helping to shield 1.5–2 million workers from slavery.

## 4. KNOW, SHOW & FIX APPROACH

**What do major brands and retailers communicate about their human rights and environmental due diligence processes? How are they assessing suppliers' adherence to their standards?**

### We awarded points if brands disclose information such as:

- How the brand works to identify and address human rights and environmental risks, impacts and violations in its supply chain (its approach to conducting due diligence)
- How workers, unions and other affected stakeholders are involved in the due diligence process
- How suppliers are assessed against the brand's policies
- The process for taking on new suppliers
- How frequently assessments are conducted (e.g. every 12 months)
- If brands conduct supplier assessments beyond the first tier
- If supplier assessments include off site worker interviews, and if so how many workers are interviewed

### KNOW

This year we introduced new indicators on human rights and environmental due diligence to understand what steps brands are taking to identify human rights and environmental risks, impacts and violations in their supply chains.

We also looked for information on how brands assess suppliers to ensure they meet their ethical standards and policies (typically factory audits) and which third party auditing standards used.

### SHOW

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

### FIX

Finally, we looked at what brands are publishing about how they remediate human rights and environmental violations occurring within their supply chain. We also checked to see if brands publish a confidential grievance mechanism for both employees and workers in the supply chain. And finally, we looked to see if brands disclose the results of their efforts to remediate violations and address grievances.



## 4. KNOW, SHOW & FIX RESULTS

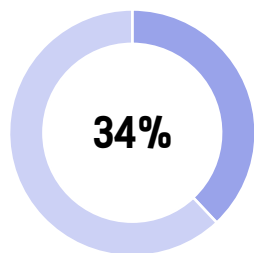
0-5%		6-10%		11-20%		21-30%		31-40%		41-50%		51-60%		61-70%		71-80%		81-90%		91-100%	
Aeropostale	5	boohoo	10	Cortefiel	19	Gildan	30	Bershka	40	Puma	46	Adidas	59								
Carolina Herrera	5	PrettyLittleThing	10	Disney	19	Hugo Boss	30	Massimo Dutti	40	Esprit	44	Reebok	59								
Chanel	5	Brunello Cucinelli	10	LOFT	19	Kmart Australia	30	Pull&Bear	40	Balenciaga	43	C&A	59								
Dr. Martens	5	Cato Fashions	10	Mizuno	19	Target Australia	30	Stradivarius	40	Bottega Veneta	43	H&M (H&M Group)	56								
Jockey	5	Dillard's	10	Prisma	19	Topman	30	Zara	40	Gucci	43										
LL Bean	5	Express	10	REI	19	Topshop	30	New Balance	40	SAINT LAURENT	43										
Nine West	5	Fossil	10	Speedo	19	Cotton On	29	Banana Republic	38	Levi Strauss & Co	43										
REVOLVE	5	John Lewis	10	Columbia Sportswear	17	OVS	29	Gap	38	Marks & Spencer	43										
Ted Baker	5	Kaufland	10	El Corte Inglés	17	Russell Athletic	29	Old Navy	38	Patagonia	43										
Tommy Bahama	5	Li-Ning	10	Fjällräven	17	ASICS	27	ASOS	37	Dressmann	41										
Armani	3	Michael Kors	10	Ito-Yokado	17	Converse	27	Calvin Klein	37	Primark	41										
BCBGMAXAZRIA	3	Muji	10	Kathmandu	17	Jordan	27	Tommy Hilfiger	37	Uniqlo	41										
Beanpole	3	Reliance Trends	10	Mango	17	Nike	27	Van Heusen	37												
Brooks Brothers	3	Ross Dress for Less	10	Matalan	17	Lidl	27	Debenhams	37												
Carhartt	3	Sandro	10	Ralph Lauren	17	Tesco	27	Lindex	37												
Claire's	3	The Children's Place	10	River Island	17	The North Face	27	United Colors of Benetton	37												
DKNY	3	TJ Maxx	10	Victoria's Secret	17	Timberland	27	Big W	35												
Eddie Bauer	3	Truworths	10	ALDO	16	Vans	27	Lululemon	35												
Foot Locker	3	Anthropologie	8	Chloé	16	Wrangler	27	Burberry	33												
Forever 21	3	Free people	8	Desigual	16	Asda	25	G-Star RAW	33												
Justfab	3	Urban Outfitters	8	Hudson's Bay	16	Walmart	25	New Look	33												
K-Way	3	Buckle	8	Saks Fifth Avenue	16	Champion	25	Sainsbury's-TU Clothing	33												
La Redoute	3	CAROLL	8	Jack & Jones	16	Hanes	25	Bonprix	32												
Neiman Marcus	3	Cole Haan	8	Vero Moda	16	Helly Hansen	25	Tchibo	32												
Steve Madden	3	DSW	8	Monoprix	16	Morrisons	25														
Calzedonia	2	Ermenegildo Zegna	8	The Warehouse	16	Target	25														
Intimissimi	2	Jil Sander	8	Tom Tailor	16	Very	25														
Tezenis	2	Miu Miu	8	Amazon	14	Abercrombie & Fitch	24														
Diane Von Furstenberg	2	Prada	8	Clarks	14	Hollister Co.	24														
Fashion Nova	2	Otto	8	COACH	14	HEMA	24														
Sports Direct	2	Tod's	8	Kate Spade	14	Next	24														
Tory Burch	2	ANTA	6	Dick's Sporting Goods	14	ALDI Nord	22														
United Arrows	2	Aritzia	6	GUESS	14	Brooks Sport	22														
Bally	0	Billabong	6	JD Sports	14	Decathlon	22														
Belle	0	Quicksilver	6	Moncler	14	Falabella	22														
Big Bazaar - ffb	0	Roxy	6	Monsoon	14	Zalando	22														
Bosideng	0	Canada Goose	6	MRP	14	ALDI SOUTH	21														
celio	0	Diesel	6	Salvatore Ferragamo	14	Carrefour	21														
Dolce & Gabbana	0	Marni	6	Triumph	14	Mammut	21														
Elie Tahari	0	Famous Footwear	6	Zeeman	14	Nordstrom	21														
Heilan Home	0	Fanatics	6	Foschini	13	Under Armour	21														
Jessica Simpson	0	Fila	6	JCPenney	13																
KOOVS	0	Furla	6	Kohl's	13																
Longchamp	0	Gerry Weber	6	Lands' End	13																
Max Mara	0	s.Oliver	6	Reserved	13																
Metersbonwe	0	Skechers	6	Superdry	13																
Mexx	0	TOPVALU COLLECTION	6	Takko	13																
New Yorker	0	Valentino	6	American Eagle	11																
Pepe Jeans	0	Versace	6	Bloomingdale's	11																
Tom Ford	0			Macy's	11																
Youngor	0			Burlington	11																
				CELINE	11																
				Dior	11																
				Fendi	11																
				Louis Vuitton	11																
				Marc Jacobs	11																
				Chico's	11																
				Costco	11																
				Hermès	11																
				J.Crew	11																
				Joe Fresh	11																
				KiK	11																
				Kmart	11																
				Lacoste	11																
				Merrell	11																
				New York & Company	11																
				Pimkie	11																
				UGG	11																
				Woolworths South Africa	11																

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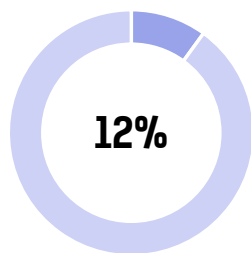
# 4. KNOW, SHOW & FIX

## FINDINGS

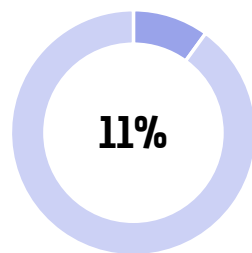
### KNOW: DUE DILIGENCE PROCESSES



disclose the approach to human rights and environmental due diligence

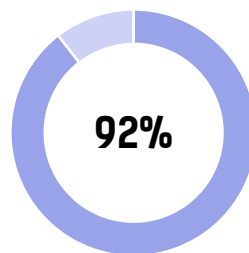


explain how affected stakeholders are involved in due diligence

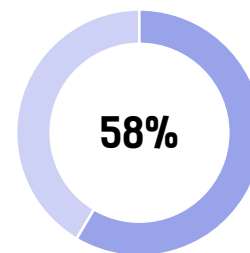


report what risks are identified and prioritised

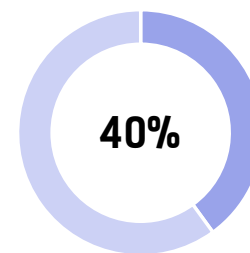
### KNOW: SUPPLIER ASSESSMENTS



disclose process for assessing conditions in supplier facilities

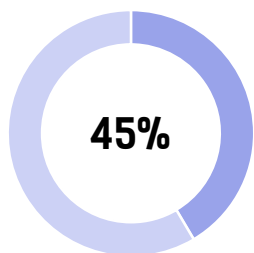


disclose the third-party audit standard(s) used

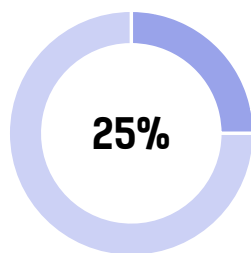


report conducting supplier assessments beyond the first tier

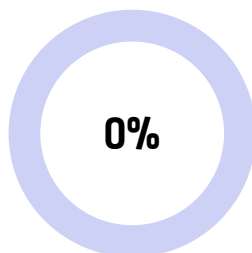
### SHOW: PUBLISHING AUDIT RESULTS



disclose aggregated first tier supplier audit findings

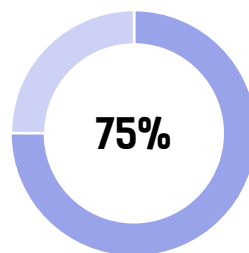


publish selected audit findings by named first tier supplier facility

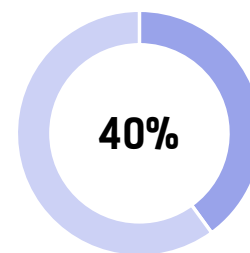


publish full audit findings by named first tier supplier facility

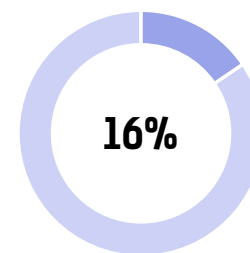
### FIX: REMEDIATING ISSUES



disclose the process for supplier remediation



publish a confidential grievance mechanism for supply chain workers



publish data about the number of grievances filed, addressed and resolved in the supply chain

# 4. KNOW, SHOW & FIX

## ANALYSIS

### KNOW

#### Human rights and environmental due diligence

Only 34% of brands are disclosing how they proactively identify human rights and environmental risks, impacts and violations in its supply chain – in other words, the company's approach to conducting due diligence. Good human rights due diligence practices are set out clearly and comprehensively in sector specific guidance published by the OECD, so we are surprised to see so few brands disclose that they conduct such processes. Most brands seem to rely on auditing their manufacturing facilities rather than explaining their broader due diligence efforts, of which supplier audits might be a part.

Furthermore, only 12% of brands explain how workers, producers, farmers, trade unions and other affected stakeholders are involved in their due diligence process.

11% of brands publish what human rights and environmental risks, impacts and violations are identified through the supply chain due diligence process and how they are prioritised (e.g. (low, medium, high). Meanwhile, just 8% of brands disclose the outcomes or results of the steps the company has taken to cease, prevent, mitigate and remedy these human rights and environmental risks, impacts and violations.

#### Supplier assessments

92% of brands publish information about what sort of supplier assessments they do, up from 88% in 2019 and 84% in 2017. These are typically social audits of factories. 58% of brands disclose which external audit standards or assessment methodologies they use, such as the Higg Index, SMETA, BSCI, WRAP and so on. This is a new indicator for 2020, and it is useful because it gives us more insight into exactly what criteria is used to measure suppliers' compliance against social and environmental standards.

Nearly half (48%) of brands explain how regularly they do supplier audits, which is typically on an annual basis but sometimes more or less frequently depending on the level of risk.

Only 13% of brands disclose data indicating how many of these audits are conducted on an announced, unannounced or semi-announced basis (where suppliers are given a two week window in which the audit will take place). There is always risk that suppliers may make special preparations for the audit. Sedex suggests best practice is to use a mix of announced, semi-announced and unannounced audits to mitigate this risk (Sedex, 2017).

Only 10% of brands report that their audit process includes interviews with workers away from the factory premises. Speaking directly to workers is crucial for understanding what conditions are really like in their workplace. Interviewing workers offsite means they have more of an opportunity to speak freely without fearing their boss might be listening and punish them as a result.

65% disclose what criteria they have in place for taking on new suppliers before production is started to ensure the facility meet its policies and standards. This is most commonly some sort of supplier self-assessment or pre-production audit requirement. This is an increase from 55% of brands in 2017.

40% of brands explain that their supplier assessments go beyond direct manufacturers to also include processing facilities, textile mills, laundries, dye houses, suppliers of raw materials and/or farms. This suggests that brands are working to ensure that their social and environmental standards are upheld throughout the supply chain and not just in the facilities with which they have a direct relationship.



## SHOW

### Disclosing the results of supplier assessments

45% of brands publish some generalised findings from their factory audits. However, considerably fewer brands share such findings beyond the first tier of manufacturing for suppliers further down the chain such as processing facilities (18%) and suppliers of raw materials (5%).

Many brands and retailers operate a grading system (e.g. Green, Orange, Red or A, B, C) for their suppliers on social and environmental compliance. However, only 2 brands (1%) actually disclose these ratings for specific named supplier facilities. For example, H&M (H&M Group) publishes a list of all its manufacturers and many of its processing facilities and fabric mills. For many of these suppliers, they include the supplier's compliance grading (Gold, Silver, Other).

A quarter of brands (25%) publish some selected audit results for specific named factories. This is usually as the result of being a member of the Bangladesh Accord on Building and Fire Safety, which has inspected and upgraded thousands of factories since the Rana Plaza collapse in 2013. On the Bangladesh Accord website, anyone can find inspection reports on building integrity and fire safety for specific factories.

Then, if someone really wanted to take the time to investigate, for brands that are publishing suppliers lists, you could cross-reference their list and the inspection reports on the Accord website to see how their specific factories are performing.

The same logic also applies to brands who are members of the ILO Better Work programme, whose website also discloses compliance reports for specific factories. Last year, brands that were members of the Alliance for Bangladesh Worker Safety and also publishing supplier lists received these points. However, the Alliance has since ceased operating. 12% of brands publish some selected audit results for specific named facilities beyond the first tier of manufacturing too.

We are looking for disclosure on audits results because there is evidence that it can drive positive change for workers in the supply chain. For example, Better Factories Cambodia (BFC) launched its online transparency database showing how individual garment factories measure up on key working conditions. One third of the 51 factories included in the 'Critical Issues' database made improvements on 21 basic legal requirements in anticipation of this data being publicly disclosed. The total number of Critical Issues violations in this group of factories fell from 59 to 34 between December 2013 and February 2014 – a 42% improvement.

## TRANSPARENCY



## FIX

### Supplier remediation plans

75% of brands disclose what happens when non-compliant issues (e.g. people working excessively long hours, people working without written terms of employment, locked fire exits or missing fire extinguishers, etc.) are found as a result of the supplier assessment process, up from 69% of brands in 2019 and 62% in 2018. Typically brands will have put in place a remediation process, often referred to as a Corrective Action Plan, where the factory is given a reasonable amount of time to rectify the issue. However, only 10% of brands explain how workers, trade unions and any other affected stakeholders are involved in the development and implementation of these remediation plans. Remediation plans tend to be most effective when the affected stakeholders are involved as it ensures the remediation efforts have the intended outcome for workers.

Only 15% of brands explain what happens when they decide to stop working with a supplier. This is important because if brands decide to abruptly drop a supplier it can have negative impacts on workers, such as suddenly losing their jobs, without any severance pay or being owed unpaid wages. 20% of brands disclose how many of their manufacturers have corrective action plans in place on an annual basis.

### Dealing with employee and worker grievances

59% of brands publish a confidential whistleblowing channel (e.g. hotline, website or email address) where their employees can file complaints or report violations of policies related to working conditions, environmental issues, corruption and other issues. 52% of brands explain how the company responds to complaints or reported violations. And, only 15% disclose data about the number of complaints and reported violations filed, addressed and resolved.

Meanwhile, just 40% of brands publish a similar sort of confidential whistleblowing channel (e.g. hotline, website or email address) for the workers in their supply chain to file complaints or report violations of the brand's policies related to working conditions, environmental issues, corruption and other issues. 36% of brands explain how the company responds to complaints or reported violations filed by workers in their supply chain. 22% of brands also explain how garment workers are informed that this grievance channel exists and how to make use of it, up from 15% of brands in 2019. And, only 16% of brands disclose data about the number of garment workers' complaints and reported violations that are filed, addressed and resolved. This ensures that workers are able to speak up about poor working conditions without the fear of being fired or punished.

**"Besides believing transparency is the right thing to do, it also makes good business sense."**

Stefan Seidel,  
Head of Corporate Responsibility, Puma Group

# VIEWPOINT:

## THE FASHION INDUSTRY HAS A TRUST ISSUE



**BEN VANPEPERSTRAETE**  
HUMAN RIGHTS EXPERT

Clothes have been at the centre of shocking global events such as the Rana Plaza factory collapse and now the widespread breach of contracts and dumping of orders as a result of the COVID-19 crisis. Over the years, brands and retailers have been the target of numerous campaigns unveiling how a highly profitable industry manages to pay their workers so little. The sector has repeatedly been the topic of exposés documenting egregious labour rights abuses. This has left many consumers, citizens and policymakers wondering whether the fashion industry can be left to its own devices.

This increased scrutiny has made 'radical transparency' not only a 'nice-to-have' or a 'trend' as documented in this edition of the Fashion Transparency Index (see the growing number of brands disclosing production locations, the increase in available data on those locations as well as brands disclosing what is happening further down the chain). Transparency in the post COVID-19 pandemic might very well become a strategy forward to rebuild the eroded trust in brands and retailers.

Current consensus expects that companies are actively going out and looking at how they are causing, contributing or directly linked to human rights violations and environmental degradation in their supply chains – and then fixing these problems. But in order to do so, it is important that companies get to know "who made their clothes" in which

**"Transparency in the post COVID-19 pandemic might very well become a strategy forward to rebuild the eroded trust in brands and retailers."**

factories production is happening, where fabric is coming from and where cotton is grown.

Only after identifying where their clothes and materials come from, can brands and retailers really start to examine what might, and often probably is, going wrong in these facilities. It requires a shift in thinking from minimising risks and violations to actively welcoming the identification of them in order to be better able to fix them. It would mean that glossy sustainability reports and damage control after painful media exposés become less of a priority, and instead attention shifts towards more radical transparency, acknowledgement of problems and an attitude (backed with the necessary resources) focussed on making things right again.

This means identifying the links that brands and retailers have with suppliers where workers are particularly at risk, for example, in sub-contracted facilities. Taking steps to identify human rights abuses in order to prevent and mitigate them leads brands and retailers further down the chain to the mills where young girls often work very long hours with limited freedom of movement or to the cotton fields where forced labour may be prevalent.

Coming back to trust, brands and retailers must be able to demonstrate that they understand how their supply chains have been built and they invite everybody who has knowledge of particular risks or abuses to get in touch. More and more companies are beginning to acknowledge the strategic value of transparency and the support it can give to their due diligence processes as well as in rebuilding trust. This is why we are seeing brands and retailers disclosing their suppliers, not only at the first tier of manufacturing but also the facilities where their cloth is woven and the sources of their raw materials. Given this trend, we will soon see a shift where it is no longer a debate about why brands need to become transparent. The focus will turn onto brands who are not disclosing their suppliers and we will all ask: what do they have to hide?

## 5. SPOTLIGHT ISSUES: *APPROACH*

Each year, we explore a few key issues in deeper detail. For 2020, our focus covers four strategic areas we call the 4 C's: conditions, consumption, composition and climate. These topics are selected and indicators formulated in consultation with industry experts. We have also designed the indicators to align with and support the United Nations' Sustainable Development Goals (SDGs), which aims to bring nations together to build a better world for people and our planet by 2030.

### CONDITIONS

What are major brands and retailers doing to improve conditions for workers within the company and their supply chains? Specifically, we looked at:

- Modern slavery and supply chain recruitment practices
- Living wages and wage data in the supply chain
- Purchasing practices and what brands are doing to be good business partners to their suppliers
- Unionisation and collective bargaining
- Gender equality and equal pay in the company and supply chain

### CONSUMPTION

What are major brands and retailers doing to address overproduction, minimise waste and move towards circularity? Here we looked specifically at:

- How many items were produced in the reporting period
- How much textile waste is generated and how much of this was destroyed or recycled
- Strategies and progress on reducing pre-consumer waste and recycling post-consumer waste

### COMPOSITION

What are major brands and retailers doing to increase the use of sustainable materials and reduce the use of virgin plastics and hazardous chemicals? We looked at:

- Strategies and progress on the switch to more sustainable materials
- Strategies and progress on the reduction of the use of virgin plastics
- What the brand is doing to minimise the impact of microfibres
- Investments in textile-to-textile circular recycling
- Strategies and progress on the reduction of the use of hazardous chemicals

### CLIMATE

Are major brands and retailers taking urgent action to combat climate breakdown and move towards sustainable management of natural resources? Here we looked at whether brands:

- Publish Science Based Targets
- Publish a commitment to deforestation
- Publish carbon footprint in owned facilities and in the supply chain
- Disclose the amount of renewable energy used in owned facilities and in the supply chain
- Publish water footprint in owned facilities and in the supply chain
- Link environmental impacts to the business bottom line

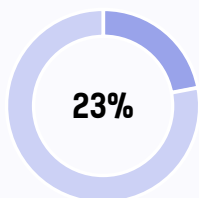
0-5%		6-10%		11-20%		21-30%		31-40%		41-50%		51-60%		61-70%		71-80%		81-90%		91-100%	
Bloomingdale's	4	ALDO	10	Champion	20	Decathlon	29	Esprit	39	Calvin Klein	47	Adidas	59	H&M (H&M Group)	63						
Macy's	4	Big W	10	Hanes	20	Fjällräven	29	Mammut	37	Tommy Hilfiger	47	Reebok	59								
Calzedonia	4	Brunello Cucinelli	10	El Corte Inglés	20	Gildan	29	The North Face	37	Van Heusen	47	Patagonia	57								
Intimissimi	4	CAROLL	10	Fendi	20	John Lewis	29	Timberland	37	Balenciaga	45	Marks & Spencer	53								
Tezenis	4	Carrefour	10	Marc Jacobs	20	Next	29	Vans	37	SAINT LAURENT	45	C&A	51								
Dick's Sporting Goods	4	Cotton On	10	G-Star RAW	20	Sainsbury's-TU Clothing	29	Wrangler	37	Bershka	45	Converse	51								
Diesel	4	La Redoute	10	Kmart Australia	20	Tesco	35	Massimo Dutti	45	ASOS	51	Jordan	51								
Marni	4	Li-Ning	10	Target Australia	20	Tchibo	29	Uniqlo	35	Pull&Bear	45	Nike	51								
Dr. Martens	4	Monoprix	10	Morrisons	20	Zalando	27	Banana Republic	33	Stradivarius	45	Gucci	51								
Fila	4	Otto	10	Tod's	20	Asda	27	Gap	33	Zara	45										
J.Crew	4	UGG	10	Topman	20	Lindex	27	Old Navy	33	Burberry	45										
JCPenney	4	Under Armour	10	Topshop	20	Ralph Lauren	27	New Balance	33	ASOS	43										
Kmart	4	boohoo	8	United Colors of Benetton	20	Target	24	Primark	33	Bottega Veneta	43										
Moncler	4	PrettyLittleThing	8	Woolworths South Africa	20	Columbia Sportswear	24	ASICS	31	Puma	43										
River Island	4	Burlington	8	Dior	24	Levi Strauss & Co	31														
Russell Athletic	4	Carolina Herrera	8	Louis Vuitton	24																
Tommy Bahama	4	Chloé	8	Hugo Boss	24																
United Arrows	4	Costco	8	Clarks	18	New Look	24														
Valentino	4	Falabella	8	Monsoon	18	OVS	24														
Armani	2	Fossil	8	Reserved	18	Speedo	22														
Canada Goose	2	Free people	8	The Warehouse	18	CELINE	22														
Cole Haan	2	HEMA	8	TOPVALU COLLECTION	18	Hermès	22														
Dillards	2	Ito-Yokado	8	Zeeman	18	Lidl	22														
DSW	2	KiK	8	Abercrombie & Fitch	16	Mango	22														
Foot Locker	2	Kohl's	8	Hollister Co.	16	Prisma	22														
Forever 21	2	MRP	8	ALDI Nord	16	Superdry	22														
Gerry Weber	2	Reliance Trends	8	ALDI SOUTH	16																
Hudson's Bay	2	s.Oliver	8	Debenhams	16																
Saks Fifth Avenue	2	Salvatore Ferragamo	8	GUESS	16																
Longchamp	2	TJ Maxx	8	Helly Hansen	16																
Matalan	2	Very	8	Kathmandu	16																
Pimkie	2	ANTA	6	LOFT	16																
Skechers	2	Anthropologie	6	Miu Miu	16																
Steve Madden	2	Urban Outfitters	6	Prada	16																

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

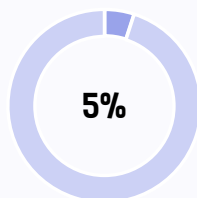
# 5. SPOTLIGHT ISSUES

## FINDINGS

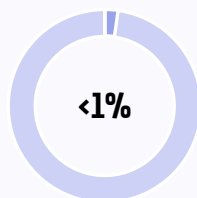
### LIVING WAGES



disclose approach to achieving living wages for supply chain workers

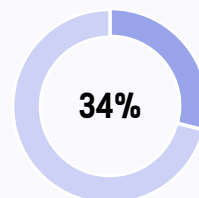


disclose annual progress towards paying living wages

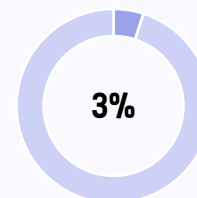


publish the number of workers being paid a living wage

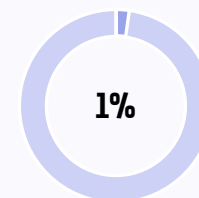
### GENDER EQUALITY



publish the company's gender pay gap

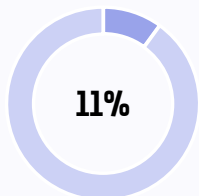


disclose how women workers are involved in the due diligence process

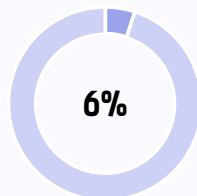


publish data on gender-based violations in supplier facilities

### PURCHASING PRACTICES

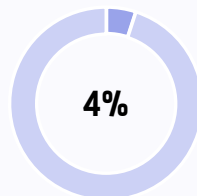


disclose method for isolating labour costs from price negotiations

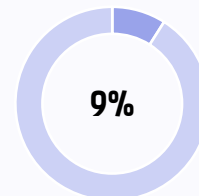


publish policy to pay suppliers within 60 days

### UNIONISATION

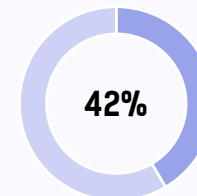


disclose number of supplier facilities that have trade unions

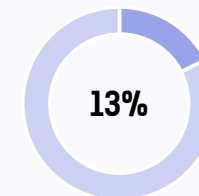


disclose number of workers covered by collective bargaining agreements

### MODERN SLAVERY



disclose approach to recruitment fees in the supply chain

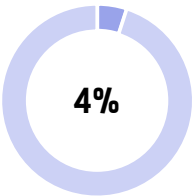


publish data on modern slavery related violations in supplier facilities

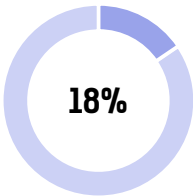
# 5. SPOTLIGHT ISSUES

## FINDINGS

### WASTE & RECYCLING

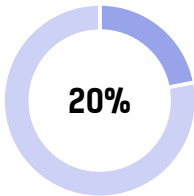


publish the amount of textile waste generated in the annual reporting period

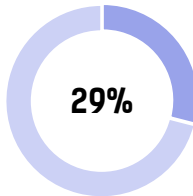


report investing in textile-to-textile recycling solutions

### PLASTICS

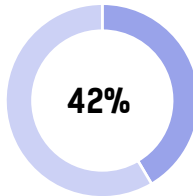


explain what the brand is doing to minimise microfibres

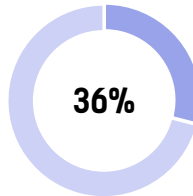


publish measurable progress towards reducing the use of virgin plastics

### SUSTAINABLE MATERIALS

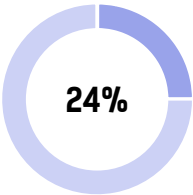


publish time-bound, measurable sustainable materials strategy

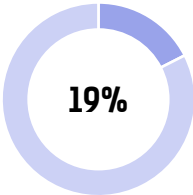


disclose progress on achieving sustainable material targets

### HAZARDOUS CHEMICALS

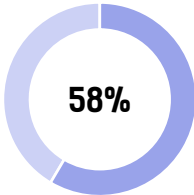


publish time-bound commitment to eliminate hazardous chemicals

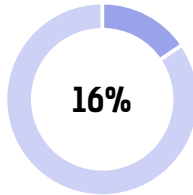


disclose progress towards this achieving commitment

### CARBON EMISSIONS

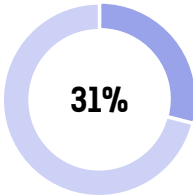


publish annual carbon footprint in company's own facilities

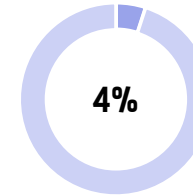


publish carbon footprint in company's supply chain

### WATER USE



publish annual water footprint in company's own facilities



publish annual water footprint at raw material level



# 5. SPOTLIGHT ISSUES ANALYSIS

## CONDITIONS

### Modern Slavery

This Spotlight Issue is new for 2020, and we are looking at the steps brands are taking to address risks of forced and bonded labour, particularly recruitment practices in the supply chain.

In the last several editions, we have looked to see if brands disclose policies and procedures related to forced and bonded labour. This year we found that 92% of brands are publishing supplier policies on forced and bonded labour, compared to 86% last year.

Only 42% of brands disclose a specific policy on the use of foreign and migrant labour. Notably, 43% of brands publish information about programmes they have in place to address foreign and migrant labour, up from 32% last year. This increase in disclosure around forced labour could be a result of the recent adoption of mandatory reporting legislation. For example, the UK Modern Slavery Act was passed in 2015 and

companies were required to start reporting about forced labour in their supply chains in 2017. Following this, the Australian Modern Slavery Act was passed in 2018 and came into force during 2019.

13% of brands publish data about the prevalence of modern slavery related violations in their supplier facilities. Potential indicators of modern slavery could include restricted freedom of movement, factories or recruiters retaining workers' passports or other identity/personal documents, forced and excessive overtime, withholding wages, debt bondage, and as explained above, grievances related to recruitment practices.

As the Institute for Human Rights and Business (IHRB) explains, "migrant workers are an ever-present feature of global supply chains, found in all sectors and all geographies. Low-income migrant workers are amongst the most vulnerable to exploitation and abuse, and are often the least able to assert their rights. For many, a lack of viable options to sustain a livelihood at home increases their willingness to accept poor working conditions abroad." In other words, victims

of trafficking are frequently trapped in forms of modern slavery. Much of IHRB's work is focused on how workers are recruited and in particular the payment of recruitment fees to secure employment. We have based the methodology in this subsection on IHRB's work.

We found that 42% of brands disclose their approach to the use of recruitment fees in the supply chain. A company's typical approach is to set a policy that no fees or related costs should be paid by workers in the supply chain as part of their recruitment process. The brand might also take steps to ensure that any fees or related costs that are paid by workers are reimbursed.

However, in order to truly understand if workers are paying recruitment fees or related costs then they would need to be interviewed about what their recruitment journey has entailed, and only 5% of brands disclose that workers are interviewed about this issue specifically.

**92%**  
of brands are  
publishing supplier  
policies on forced  
and bonded labour

## LIVING WAGE

[noun]

The remuneration received by a worker in a standard working week in a particular place sufficient to afford a decent standard of living for the worker and her or his family. Elements of a decent standard of living include food, water, housing, education, health care, transport, clothing, and other essential needs including provision for unexpected events.

### Living wages

Less than a quarter (23%) of brands disclose the company's approach to achieving the payment of living wages to workers in the supply chain, an increase from 19% of brands in 2019. Brands that disclose this information will typically do so by explaining their participation in living wage focused initiatives such as ACT, Fair Wear Foundation's Wage Ladder, Fairtrade Textile Standard and the Fair Labor Association's Fair Compensation Strategy.

Only 5 brands (2%) publish a time-bound, measurable roadmap or strategy for how they will achieve a living wage for all workers across their supply chains. For example, Patagonia publishes a

commitment to "reach living wages by 2025 with our apparel assembly factories" and links to Fair Labor Association's Fair Compensation Work Plan to illustrate how they are working towards this goal. In fact, Patagonia is the only brand to disclose relevant information for every indicator we looked at in the living wages sub-section. Swedish fast fashion brand LindeX explains, "Our goal is that by 2025, LindeX suppliers who stand for 80% of our production work actively with a living wage program." In the luxury sector, Gucci says, "both Kering and Gucci have developed a 2025 strategy to achieve a living wage for all workers across our supplier network". Even though it is an ambitious task, an open-ended goal gives no indication on the timescale in which workers might expect to be paid higher wages.

According to Labour behind the Label (2019) there is a gap of 2 to 5 times, between minimum or industry standard wages and most living wage benchmarks based on a cost of living methodology. In India, for example, the minimum wage is half of the value that unions have been asked for and only a third of the Asia Floor Wage.

Just 6 (2%) brands explain what living wage estimates they use to track and benchmark wages for workers in their supply chains. For example, New Zealand based retailer The Warehouse

benchmarks its supply chain wage data against both the Anker methodology and Asia Floor Wage calculations in Bangladesh and China. Outdoor brand Patagonia also uses the Anker Methodology, while Mammüt uses the Fair Wear Foundation Wage Ladder, which is based on a range of industry calculations including the Asia Floor Wage. Mammüt explains, we have "been analyzing the wage levels of the sewing workers in [our] factories. As they mostly use FWF audits they have used the wage ladder information for this analysis".

Furthermore, only 12 (5%) of brands report annual, measurable progress towards paying living wages to workers in their supply chains.

Only 5 brands (2%) publish data on the percentage above the minimum wage rate workers are paid in their supply chains. For example, in its 2018 sustainability report (page 74) H&M (H&M Group) reports that, "When analysing the data from supplier factories in our key market suppliers, we can see that the factories which are implementing improved Wage Management Systems pay higher take-home wages than those which don't. In 2017, the difference ranged from 8% higher take-home wages in Bangladesh to 29% in Indonesia. In 2018, the difference ranged from 2% in Turkey to 11% in Indonesia. In Myanmar first factories started implementing improved Wage Management Systems in late 2017

which is why first results show a positive development since 2018." PUMA explains that, "on average, our core suppliers pay 21% above legally mandated minimum wages in their respective countries. Adding overtime and bonuses, this increases to 84%".

And finally, only one brand discloses the percentage or number of workers in its supply chain that are being paid a living wage. Granted this data is not very easy to find and buried many pages within a self-published magazine found via their blog, Patagonia explains, "Based on our initial analysis, our apparel suppliers pay at least 81% of the living wage, 18% of them paying above the living wage." However, it is not just Patagonia. This is true for many brands, where relevant disclosure is buried within 100+ page reports and in footnotes and appendices.

This is an urgent issue for so many workers in the textile supply chain who struggle to afford life's basic necessities. While it is a complex issue to solve, without more collective action and greater transparency from major brands and retailers, it will be a very long time before workers are paid decent and fair wages.

## Purchasing practices

Responsible purchasing practices go hand-in-hand with the ability of suppliers to pay workers adequate and reliable wages. Yet, on the whole, brands disclose shockingly little about what they're doing to be good business partners to their suppliers.

For example, only 11% of brands disclose the method they use for calculating and ring-fencing labour costs when negotiating the price they pay suppliers for products, up from 3% of brands in 2019. Ideally, these labour costs should cover the wage rate as well as overtime, social security, sick leave, vacation and other forms of leave, the cost of indirect labour and planned or potential wage increases. This ensures that labour costs are non-negotiable and enables suppliers to pay their workers adequate and fair wages.

Since the outbreak of coronavirus we have heard about the devastating impacts of cancelling orders, including orders already in production, and delaying payments, with many brands invoking the force majeure clause to free them of their contractual responsibility to pay suppliers at all.

When supplier payments are delayed this can have a knock-on effect on their cash flow and impacts their ability to pay workers on time. We found that only 15 brands (6%) publish a policy stating that they pay suppliers within 60 days (e.g. via UK Prompt Payment Code commitments) and only 4 brands (2%) publish data

about the percentage of payments made to suppliers on time and according to agreed terms.

In the past few weeks millions of workers making clothes for some of the world's most profitable companies have been laid off or temporarily suspended without receiving the pay they are entitled to by law and the vast majority have no savings to fall back on and no social protection. Poverty and hunger could potentially prove more of a threat to their lives than the virus.

Finally, only 13 brands (5%) publish information about their supplier's feedback on the brand's buying behaviour. Supplier feedback is typically gathered through participation in the Better Buying initiative, through internal supplier surveys or during annual Supplier Summit events organised by brands in their sourcing regions. This is useful information because it gives an indication as to whether brands are willing to listen and makes changes to be better business partners to suppliers.

Right now brands' purchasing practices are being called into question as they seek to deal with the economic crisis caused by the coronavirus pandemic. This is why it's vital that brands share more information about how they do business with their suppliers, so that they can be held accountable, and stick to their commitments in order to prevent workers and their families from going hungry.

**"Secrecy is the  
linchpin of abuse  
of power...its  
enabling force.  
Transparency is the  
only real antidote."**

Glen Greenwald,  
Attorney and journalist

## Unionisation and collective bargaining

Freedom of association, including the right to form and join trade unions and collectively bargain all are fundamental labour rights enshrined in a number of international agreements and national laws. These are considered enabling rights because when workers can join together to speak out and negotiate with their employers for better working conditions, it means they can address other issues that concern them most such as pay, maternity rights, health and safety and other associated rights.

This is why it's shocking that only 9 brands (4%) publish the percentage or number of factories in their supply chain that have independent, democratically elected trade unions that workers can join, and 22 brands (9%) publish the percentage or number of workers in their supply chain that are covered by collective bargaining agreements (CBAs).

## Gender equality

The global fashion industry employs millions of women, from farm to factory to retail. Each year we explore what gender-focused policies are disclosed by major fashion brands. This year, we found that less than half the brands (49%) publish employee policies on equal pay while 61% of brands publish supplier policies on equal pay. Meanwhile 34% of brands disclose information about how they put their equal pay policies into practice.

Conversely, 43% of brands now publish employee policies on maternity rights and parental leave, compared to 31% in 2019, while 29% of brands publish supplier policies on maternal rights and parental leave, compared to 22% last year.

Earlier we described what sort of disclosure we have seen from brands when it comes to human rights and environmental due diligence. Considering such a huge proportion – estimates say 70–80% – of the garment sector workforce are women, very few brands (only 3%) explain how women workers, women's organisations and/or gender experts are involved in the company's due diligence processes.

Despite ample research that shows how commonly women workers are subjected to gender-based harassment and violence in the garment and textile-manufacturing sector, only 2 brands (1%) publish data on the prevalence of gender-based violations in their suppliers' facilities. These violations could relate to issues such as sexual harassment, gender-based violence, discrimination against pregnant workers, lack of maternity pay, lack of bathroom breaks, not allowed during periods and so on. Considering that data from CARE International (2019) suggests that 50% of women garment workers in southeast Asia have experienced sexual harassment in the workplace, we hope that in the near future brands begin to publish more data on this important topic.

Women who work in garment manufacturing also tend to be employed in the lowest paid job roles, whereas men are commonly supervisors and factory managers. Despite this inequality, only 2% of brands publish data on the sex disaggregated distribution of job roles in their supply chain (e.g. lower paid roles such as helpers and machinists verses higher paid roles such as supervisors and managers).

On the other hand, brands seem to be doing more to be transparent about gender equality (or lack thereof) when it comes to jobs roles in their own companies. Over half of the brands (52%) publish data on the annual sex disaggregated distribution of job roles (e.g. executives, managers, supervisors, employees).

34% of brands publish the annual gender pay gap within their companies. This is often as a result of government regulation. For example, in the UK companies have been required by law to publicly report this since April 2018.

**34%**  
of brands publish  
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their companies

# 5. SPOTLIGHT ISSUES

## ANALYSIS

### CONSUMPTION

Global clothing consumption has more than doubled from 74.3 billion items of clothing and footwear in 2005 to 130.6 billion items in 2019 (Euromonitor, 2020). This equates to every person on the planet buying 15 garments and 2 pairs of shoes annually (although buying patterns vary considerably across countries). At this rate of growing consumption, coupled with population growth and increasing wealth in emerging economies, we could expect production and consumption of clothing and footwear to triple by 2050 (Ellen MacArthur Foundation, 2017).

As the world faces accelerating climate breakdown, we cannot continue making, buying and discarding clothing at the current and expected rates. This is why we focused on overproduction, overconsumption and waste as part of this year’s Spotlight Issues.

### Annual production volume

We thought it particularly interesting to see if brands disclose data on production and waste volumes. We found that 23 brands (9%) publish the number of products (e.g. garments, shoes, socks) they made over the annual reporting period, and some of the numbers are staggering (see table for examples).

We also found that 11 brands (4%) disclose the percentage or volume of product/textile waste generated during the annual reporting period, and 7 brands (3%) disclose the percentage, volume or number of products destroyed (typically incinerated) during the annual reporting period.

Brand	Annual product volume in the reporting period
Inditex (Zara, Bershka, Massimo Dutti, Pull&Bear, Stradivarius)	1.6 billion
Gildan	1.4 billion
Adidas (incl. Reebok)	866 million*
OVS	755 million
Mango	146 million**
Benetton	101 million

\* 457 million unit of apparel and 409 million pairs of shoes

\*\* 8 million of which are reportedly garments made in a more sustainable manner



## Waste, repair and recycling

Estimates suggest that around one quarter of the industry's resources are wasted as leftovers of textile and garment production every year, which is why we wanted to see how brands are publicly addressing this issue (Global Fashion Agenda, 2018). We found that 27% of brands publish information about the steps they're taking to reduce the amount of clothing and textile waste created during production. This waste might include textile or product off-cuts, unsold and defective stock and production samples, and 11% of brands are reporting on their progress to reduce this pre-consumer production waste.

When it comes to post-consumer waste, we found that 30% of brands offer their customers a permanent, year-round clothing take-back and in-store recycling scheme, and only 16% of brands offer and advertise repair services to their customers in order to help extend the life of their products. Considering that British households threw away 300,000 tonnes of clothing in 2016 (WRAP 2017), it is surprising that so few brands seem to be working to keep these products out of landfill through clothing repair and take-back schemes.

Meanwhile, the aim of textile-to-textile recycling is that eventually the fibres and textiles used in clothing will be able to be used repeatedly and for much longer, dramatically reducing the need to create new clothes from virgin resources. We found that 18% of brands explain what they are doing to develop circular solutions that enable textile-to-textile recycling (innovations beyond textile reuse and downcycling), but only 4 brands (2%) publish data on what percentage or number of products are designed to enable closed loop or textile-to-textile recycling at end of the product's life.

Since the outbreak of coronavirus, retail stores across the world have been forced to shut their doors and lay off or furlough staff, meaning clothes are going unsold. By the time stores reopen these products may well be considered 'out of season'. This begs this question: what will happen to all of these perfectly good materials? Will they be sold, reused, given to charities, go to landfill, be incinerated, recycled? The fashion industry already has a huge overproduction and waste problem. And, technology is simply not yet available to recycle textiles in a truly circular way and at scale. It is concerning that the consequences of the pandemic may make this problem even worse.

BELOW: Cast-off woolen clothing is sorted again in large warehouses in Panipat, Tim Mitchell



# 5. SPOTLIGHT ISSUES

## ANALYSIS

### COMPOSITION

#### Using more sustainable materials

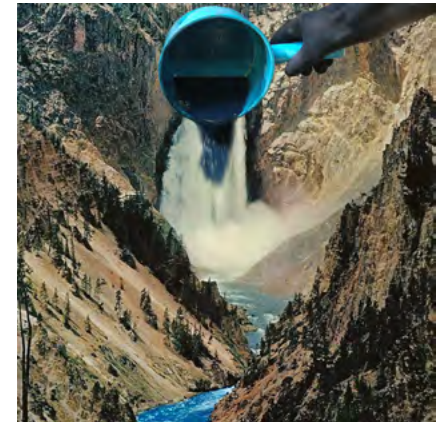
Several major brands are taking steps to use more sustainable materials such as 'better' and organic cotton, recycled polyester and wool, traceable down and chrome-free leather. The use of these materials are often what makes up brands' seasonal collections marketed as 'sustainable' or 'conscious.' However, we found that less than half of brands (42%) publish a time-bound and measurable strategy or roadmap (including targets) on the use of more sustainable materials. Meanwhile, 36% of brands report annually on progress toward achieving these sustainable material use targets, up from 29% in 2019.

#### Plastics

Every time someone washes a garment made of synthetic materials, especially polyester, tiny particles of plastic – too small to be caught by conventional water treatment – enter our water systems, ending up in rivers, lakes and oceans. Up to 700,000 microfibres can shed from our clothes in a typical wash (Napper and Thompson, 2016). As a result, textiles are now the largest source of global primary microplastic pollution and have even been detected in the deepest parts of the ocean (Boucher and Friot, 2017). We expected brands to be addressing this alarming issue, but we found that only a fifth of brands (20%) publish information about what the brand is doing to minimise the impact of microfibres. When it comes to reducing the use of plastic more generally, we found that 27% of brands publish measurable, time-bound targets for the reduction of the use of virgin plastics (including plastic-based textiles, accessories, hangers, packaging).

#### Hazardous chemicals

Some of the toxic chemicals used in clothing, including lead (dyes), NPE (industrial washing), phthalates (printing), PFC compounds (water-repellent coating) and formaldehyde (wrinkle-resistance treatment), can potentially cause serious health problems. Considering that the textile industry is a significant contributor to water pollution globally through the lack of proper disposal of chemicals, we were surprised to see that less than a quarter of brands (24%) publish a time-bound commitment or roadmap towards eliminating the use of hazardous chemicals in products, and 19% of brands are reporting progress towards achieving these goals. When brands are taking steps to mitigate the use of hazardous chemicals in their products, it's usually as part of regulatory obligations such as REACH in the EU or through multi-stakeholder initiatives like the ZDHC Roadmap to Zero.





# 5. SPOTLIGHT ISSUES

## ANALYSIS

### CLIMATE

#### Carbon emissions

Considering that climate breakdown is accelerating and the world's foremost scientists say we have about a decade to mitigate the most catastrophic impacts of global heating, we would have expected fashion brands and retailers to be moving much more swiftly towards net-zero carbon emissions.

Dozens of brands have recently joined the UN Fashion Industry Charter on Climate Action and the G7 Fashion Pact to achieve this goal by 2050. Meanwhile, a 2018 report from the World Health Organisation predicted that an additional 250,000 deaths a year will occur between 2030 and 2050 due to global heating, and too many fashion brands continue to say little about the steps they are taking to drastically reduce their environmental impacts.

78% of brands publish a company policy on energy use and carbon emissions, while 52% publish a supplier policy on this topic. However, only 16% of brands publish

Science Based Targets, which means their environmental goals are aligned with the Paris Agreement's aim to limit global heating to below 2°C above pre-industrial levels.

58% of brands publish annual carbon emissions in their owned and operated facilities (e.g. head office, retail stores, distribution centres, warehouses, transport and mail orders, etc.), but only 16% of brands publish annual carbon emissions produced within their supply chains – where the highest proportion of carbon is emitted across the lifecycle of a garment.

We anticipate seeing more disclosure on brands' efforts to reduce carbon emissions next year as more brands join the G7 Fashion Pact and the UN Fashion Industry Charter.

36% of brands publish the percentage of renewable energy used in the company's owned and operated facilities (e.g. head office, retail stores, distribution centres, warehouses, etc.), but only 6% of brands publish this information within the supply chain.

Just 7 brands (3%) are mapping environmental impacts directly to their financial performance. For example, Kering Group (Balenciaga, Bottega Veneta, Gucci, Saint Laurent) publish a highly detailed Environmental Profit and Loss report, which utilises a sophisticated natural capital accounting methodology. On top of this, Kering Group freely shares their methodology, welcoming and encouraging other companies to use it. However, other brands do not seem to be taking advantage of this innovative open-source methodology, which has been freely available since 2015.

Limiting deforestation is also a crucial part of mitigating global carbon emissions. Considering recent public outcry about the destruction of the Amazon and the wildfires that ravaged Australia, it is shocking that only 4 brands out of 250 (2%) publish a time-bound, measurable commitment to zero deforestation – meaning that no forest areas are cleared or converted. Whereas, zero net deforestation allows for the clearance or conversion of forests in one area as long as an equal area is replanted elsewhere.

#### Water use

52% of brands publish a company policy on water use, and 42% publish a supplier policy on water use, up from 36% of brands in 2019. However, considering that a global water crisis has been ranked in the top 5 global risks (WEF, 2020), it is surprising to see little progress when it comes to brands disclosing water usage data, especially at a raw material level. There has been no increase in water footprint disclosure at any level. 31% of brands publish the annual water footprint in their owned and operated facilities (e.g. head office, retail stores, distribution centres, warehouses, etc.). 14% of brands publish the annual water footprint at manufacturing and/or processing facility level within the supply chain, and only 4% publish this information at fibre production and/or raw material level.

# VIEWPOINT:

*HOW TO SURVIVE A PANDEMIC:  
GARMENT WORKERS IN COVID-19*

GARMENT WORKER CENTER

**"Last week, I made 4,500 masks and made \$230 total, that is 5 cents a mask."**

Santiago,  
Father of six children

**"Me and my mom are told the company is closed but that's not true. Me and mom are not working. We are not [able to] pay rent right now. "**

Paulina  
Produced for Fashion Nova

For too long, the fashion industry has profited by making garment workers invisible. Popular brands and retailers earn PR points for selling "Made in USA" goods, but lack of transparency in production supply chains and purposefully opaque purchasing practices enable them to deny accountability for horrendous working conditions and massive wage theft commonly experienced by members of the Garment Worker Center.

In the time of COVID-19, garment workers are finally recognized as essential labor because we alone have the necessary skills to produce personal protection equipment (PPE). At the same time, 45,000 garment workers in Los Angeles are largely out of work with no safety net to rely on, while others cannot afford the loss of income and have to work despite the risks, with little to no health protection or assurance of fair wages.

Many brands are restructuring their local supply chains to win government contracts that require some transparency into working conditions and safety practices. But more can be done.

Alongside the International Labor Rights Forum and supported by 31 other organizations including Fashion Revolution USA, we are urging companies to implement and report back on their workers' rights and health protection.

Transparency is a crucial first step for industry accountability. For the fashion industry to survive this crisis, brands must #PayUp. They must ensure to pay their contracts with manufacturers and ensure that manufacturers pay garment workers because our labor has always been essential.

This is why we launched the GWC Emergency Relief Fund because many brands still fail to take accountability even in an unprecedented pandemic.



4

# FINAL THOUGHTS & RECOMMENDATIONS



# TAKE ACTION ON TRANSPARENCY

## Brands and Retailers

We call on major brands and retailers to be more transparent about your social and environmental policies, practices and impacts.

We call on brands and retailers to publish this information in a way that is easily accessible, understandable, honest and comprehensive.

You have the power, resources and moral imperative to ensure that every single person working in your value chain is paid fairly, treated with dignity and working in safe conditions. To address the urgent climate crisis, you must move faster to reduce the consumption of earth's finite resources and shift to business models that are regenerative instead of destructive and linear.

By being more transparent about your policies, practices and impacts, your customers and stakeholders can come along with you on that journey, support you in making that change and ensure you are accountable for your impacts.

### In the next 12 months, we urge major brands and retailers to:

- ❑ Publicly disclose your suppliers starting with the first tier, but don't stop there. Map and publicly disclose your full supply chain, right down to raw material level.
- ❑ In response to the coronavirus pandemic, honour your contracts and commit to supporting your suppliers and supply chain workers in this time of crisis. Publish more information about your purchasing practices.
- ❑ Publish more information about your environmental impacts, including the amount of carbon emissions, water consumption, pollution and waste created across your value chain, and explain what you're doing to conserve and regenerate resources.
- ❑ Answer your customers' #WhoMadeMyClothes requests on social media or via email with practical information and data, not just your policies and principles.

## Governments & Policymakers

Better policies and regulations, with more effective implementation and enforcement, are needed to transform environmental sustainability and respect for human rights in the global fashion industry.

A few fashion brands and retailers are leading on transparency and making moves towards being more sustainable and responsible, but the vast majority of brands are doing and disclosing very little. These laggards won't move without being forced to do so through legislation.

### In the next 12 months, we urge major brands and retailers to:

- ❑ Invest in better implementing and enforcing existing laws and policies that are meant to protect fashion's supply chain workers and the environment.
- ❑ Ratify ILO Convention 190: Eliminating violence and harassment in the world of work.
- ❑ Put mandatory human rights and environmental due diligence on the legislative agenda and move towards proposing, passing and adopting this legislation. Make sure it includes liability for a company's contribution to harms caused in the global supply chain.

# TAKE ACTION ON TRANSPARENCY

## Citizens

We encourage you to demand that major brands and retailers are more transparent. Always ask the brands you buy [#WhoMadeMyClothes](#). You can do this by tagging your favourite brands on social media and using this hashtag, or you can use our [automated email tool](#) to get in touch with them directly.

Why ask this question? Because it sends brands a strong message -- you care about the way your clothes have been made and want the assurance that the people making them have been paid fairly, treated with dignity and that the environment wasn't destroyed in the process. We promise you that brands are listening, so use your voice and tell them to be more transparent.

You have the right to know that your hard-earned money is not supporting exploitation, human rights abuses and environmental destruction. But there is no way to hold brands and governments to account if information about what we buy is kept secret.

Write to your elected officials and urge them to require brands and retailers to be more transparent about how their clothes are made. Tell your government that they should make companies legally responsible for the impacts they have on the environment and the lives of people working in their supply chains, at home and abroad. You can do this using our [write a postcard to a policymaker](#) tool.

**"Transparency is the first step towards a different culture, one where brands become open and accountable, and customers are ready to become vigilant and ask, 'who made my clothes?'"**

Orsola de Castro,  
Co-founder, Fashion Revolution



# THANK YOU!

We extend the utmost gratitude to our pro bono consultation committee, who have been instrumental in guiding our team through this project each year – Dr. Mark Anner, Neil Brown, Ian Cook, Subindu Garkhel, Kristian Hardiman, Christina Hajagos-Clausen, Jenny Holdcroft, Aruna Kashyap, Kate Larsen, Dr. Alessandra Mezzadri, Katie Shaw, Francois Souchet, Joe Sutcliffe and Ben Vanpeperstraete. An absolutely enormous thank you to all the others who provided informal feedback on the methodology and report – you know who you are!

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We would also like to thank the representatives from the brands and retailers who participated in the Fashion Transparency Index this year. We know that brands receive frequent requests for information from civil society and NGOs, and it's difficult to respond to them all and still get work done. Your participation is both vital and appreciated.

As always, the biggest thanks to the Fashion Revolution team – especially Carry Somers and Emily Sear, Bronwyn Seier and Maria Maleh for their beautiful and clever design and branding talent. Thanks to all of Fashion Revolution's Country Coordinators, who brilliantly and effectively power the movement.

Big thanks also to our PR company Alfred and Maria Nishio at Central Saint Martin's. And finally, thank you to Laudes Foundation and the European Commission for your generous support.

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

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

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

[www.fashionrevolution.org/donate](https://www.fashionrevolution.org/donate)

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



Laudes —  
Foundation



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# ANNEX 2:

## DEFINITIONS & ABBREVIATIONS

**Auditing** is the process of reviewing a company's finances, working conditions, and environmental practices. It uncovers risks to workers' safety and opportunities to improve working conditions. (Source: [Walk Free Foundation](#))

**Circularity (or Circular Economy)** is an alternative to a traditional linear economy (make, use, dispose) in which we keep resources in use for as long as possible, extract the maximum value from them whilst in use, then recover and regenerate products and materials at the end of each service life. (Source: [WRA<sup>2</sup>](#))

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

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

**Downcycling** is to recycle something in such a way that the resulting product is of a lower value than the original item. Examples include recycling textiles into building insulation, rags, or carpet underlay. (Source: Merriam Webster)

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

**Freedom of Association** is the right of individuals and workers to form and join groups of their own choosing in order to take collective action to pursue the interest of the members of the group. (Source: [ILO](#))

**Forced labour** is any work or service which people are forced to do against their will, through the use of violence or intimidation, or by more subtle means such as accumulated debt, retention of identity papers or threats of denunciation to immigration authorities. Forced labour is the most common element of modern slavery. (Source: [ILO](#) and [Anti-Slavery International](#))

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

**Grievance mechanism** is a complaint process that can be used by workers, allowing them to voice concerns about working conditions without fear of punishment or retribution. (Source: [Verite](#))

**Living wage** is a wage a worker earns in a standard working week that is enough to provide for them and their family's basic needs – including food, housing, clothing, education and healthcare. (Source: [Clean Clothes Campaign](#))

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

**Microfibrres** are fibres that are shed from clothing during production, consumer use, or end of life, and end up as pollution in the environment. Microfibrres from synthetic clothing (such as polyester) are the largest source of primary microplastics polluting our oceans. Microplastics are any plastic particles smaller than 5mm. (Source: [IUCN](#))

**Pre-consumer waste** is generated by textile and clothing manufacturers during any stage of the production clothing. Pre-consumer wastes include textile scraps after the cutting of garment pieces, leftover textile samples, selvages, end-of-roll wastes, damaged materials, part-finished or finished clothing samples from the design and production department. (Source: [Dobilaite et al., 2017](#))

**Purchasing practices** refers to a company's process of buying goods and services. This might include activities such as planning and forecasting, design and development, cost negotiation, sourcing and placing orders, production management and payment and terms. (Source: [Better Buying](#))

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

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

**Sex-disaggregated data** is information which is measured and separated according to gender. It allows comparisons on outcomes between women and men on specific topics and brands measuring and providing it will increase the visibility of women and the issues they face across supply chains. (Source: [BSR](#))

**Supply chain / value chain** refers to all the steps it takes to produce and sell a product, from farm to closet. (Source: [OECD](#))

**Wet processing facilities** are involved in the production of clothing whose activities typically involve rinsing, bleaching, dyeing, printing, treating or coating fabric and laundering. (Source: [Garment Merchandising blog](#))

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# ABOUT FASHION REVOLUTION



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

We believe in a global fashion industry that conserves and restores the environment and values people over growth and profit.

The issues in the fashion industry never fall on any single person, brand, or company. That's why we focus on using our voices to transform the entire system. With systemic and structural change, the fashion industry can lift millions of people out of poverty and provide them with decent and dignified livelihoods. It can conserve and restore our living planet. It can bring people together and be a great source of joy, creativity and expression for individuals and communities.

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

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**"If we are to evolve from this global pandemic to become a more balanced and mindful fashion industry, we have to make darkness a thing of the past, and embrace radical transparency as our guiding light."**

Orsola de Castro  
Co founder, Fashion Revolution



Help us keep our resources open source and free for all, so we can continue to drive change in the fashion industry and improve the lives of the people who make our clothes.

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